



Question	Your response
<p>Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused?</p>	<p>Yes. We believe that establishing a more ‘service neutral’ approach to PSM delivery and regulation would be of value, so long as there are real, tangible benefits to audiences.</p> <p>Allowing the PSM providers to be more flexible in deciding which mechanism, via broadcasting or online platforms, are best suited to deliver their obligations is advantageous, so long as there is a robust framework in place that allows this to happen.</p> <p>Outcome focused requirements and some quotas can be productive, but they need to be well defined, measurable, and accountable. In addition, we wondered if there needs to be a specific intervention to support PSBs in their role of countering misinformation.</p>
<p>Question 2: Do you agree with our proposals for a clear accountability framework?</p>	<p>Yes. We support the important role that Ofcom plays in maintaining and strengthening the PSM system and believe this should be maintained in any future regulatory system.</p> <p>We consider that a more nuanced framework, that takes into account the linear and online worlds is of benefit to the PSM providers. However, the framework, which ideally needs to be agreed by all parties, has to be well designed in order to hold the PSBs to account.</p> <p>The KPIs and success metrics need to be apposite, applicable, and concise; there has to be a strong sense of clarity and transparency relating to the proposal; and there must be a well-defined, detailed reporting process. Ofcom needs to be able to monitor delivery and hold the PSMs to account, and so the structure surrounding this needs to be robust, achievable, and enforceable.</p>
<p>Question 3: What do you think should be included in the PSM ‘offer’?</p>	<p>We feel that the breadth and depth of PSM content should be both readily available and easily accessible to all audiences. It is critical that audiences continue to benefit from a wide variety of choice, both from an online and TV channels perspective.</p> <p>It is important that regulation ensures every region in England is reflected in the output of</p>

	<p>those delivering PSM and that production can thrive in all parts of England.</p> <p>As noted in the consultation document, in 2019, Ofcom ‘recommended that the government introduce legislation to ensure that existing PSBs’ on-demand services and content – as well as their existing broadcast TV channels – were given prominence across connected TVs’ (5.21, p.40). This is apposite as it ensures that audiences have access to, and can easily find, a broad and diverse range of PSM content; in addition, it also allows for the PSM providers to remain visible and front-of-mind, driving value back to their own brands and services.</p> <p>It makes sense, as per point 5.31 (p.41) that commercial PSBs would be required to provide a ‘regulated offer’ to all major TV platforms, and that the BBC would be expected to offer the full iPlayer service.</p> <p>The opportunity to offer enhanced forms of a PSB’s services to platforms, and benefitting commercially is appropriate, but should negotiations between a PS provider and platform reach an impasse, a core and diverse offer must be available.</p>
<p>Question 4: What options do you think we should consider on the terms of PSM availability?</p>	<p>As noted in section 5.29 of the consultation document, in relation to PSM availability, there is value in providing clarity on what providers must offer; and also considering the terms on which PSM is made available.</p>
<p>Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries’ approaches?</p>	<p>We think that it is important that the PSBs continue to play an important role in the broadcasting eco-system; whatever the business model, whether that be the licence fee, advertiser-funding, in-house production, or international distribution and licensing, each PSB should be encouraged to look at ways to grow these further, including the digital space and subscription services.</p> <p>As can be seen in the consultation document (6.20, p.50), from an international viewpoint, where public funding is provided by the state, the lessons learned are worth taking into account. It is essential that there is always a consistent and regular source of funding, that the PSBs remain independent from political</p>

	<p>interference, and that the funding model is transparent and accountable. In addition, it is critical that the model is not a survival-of-the-fittest one, where the only metrics for success are the bottom line, revenue, and profit.</p>
<p>Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?</p>	<p>As has been noted, there are numerous examples where the PSBs already collaborate. We believe that in order for these and future collaboration to work well, there needs to be a genuine desire, an absolute audience need, and a long-term strategy that is both realistic and attainable.</p> <p>Audiences could benefit hugely from strategic partnerships and co-commissions, PSBs could benefit from a brand attribution and reputation perspective, and the production sector in England could benefit too, with a potential increase in diversity, new voices and stories being discovered and heard, and production being spread throughout the country.</p> <p>The benefits of further collaboration could be even more advantageous - if it means that viewers have easily available access to programmes and events that they may otherwise have missed out on; or if it provides an opportunity to provide specifically tailored content to under-served audiences; or if it allows innovation, creativity and new content to surface on digital and television platforms, in ways that are relevant to consumers, then that is a win.</p>
<p>Question 7: What are your views on the opportunities for new providers of PSM?</p>	<p>We believe that whilst it is a crowded market, there are development opportunities for new providers of PSM.</p> <p>Whilst the current PSBs' content is limited in terms of certain genres, is repeated extensively on their own branded channels and VOD players, and does exist to an extent outside of these, more can be done.</p> <p>We think that there is still room for PSB content to be made more widely available on other platforms. Extending reach of PSM could enable the PSBs to potentially attract hard-to-reach audiences; provide research data and insight; be an additional source of income generation; provide further chances to market their brands;</p>

and allow PSB attribution to return to the PSB, instead of the platform provider.

In addition, and given that communities whose first language is not English may be under-served by current PSMs, we also wonder if there is an opportunity to include a public service element to broadcasting in other languages. This could take the form of either specific content, or existing content that is translated and placed on to platforms that are relevant to and watched by those audiences.