

**Question 1: Do you agree that public service provision and funding beyond the BBC is an important part of any future system?:**

Absolutely. We do not want to end up with a US style system of only one public interest channel and everything else of lower quality. It is essential that viewers have choice and that a range of opinions can be heard on the issues that matter. It is also in the public interest to ensure the opportunities are there for commercial engagement in the creative industries.

**Question 2: Which of the three refined models do you think is most appropriate?:**

A refined competitive funding model.

We need the greatest encouragement for programme making in Scotland, not just for the Scottish market but for a fair share of all UK programmes. This encourages variety of provision and minimises regulation.

**Question 3: Do you agree that in any future model Channel 4 should have an extended remit to innovate and provide distinctive UK content across platforms? If so, should it receive additional funding directly, or should it have to compete for funding?:**

All funding should be competitive, but there should be a role for regional providers to compete for national content.

**Question 4: Do you think ITV1, Five and Teletext should continue to have public service obligations after 2014? Where ITV1 has an ongoing role, do you agree that the Channel 3 licensing structure should be simplified, if so what form of licensing would be most appropriate?:**

PSB obligations should be competitive. It is appropriate that major channels should be held to a percentage commitment to quality broadcasting. The funding should follow the quality.

**Question 5: What role should competition for funding play in future? In which areas of content? What comments do you have on our description of how this might work in practice?:**

Funding should cover issues such as ensuring local news coverage, original drama, performing arts' truly educational content e.g. history, landscape, popular science. That is content of a serious nature delivered in an accessible way. It is important within this that there be good regional delivery, and that regional issues also be aired elsewhere on the national network.

**Question 6: Do you agree with our findings that nations and regions news continues to have an important role and that additional funding should be provided to sustain it?:**

Yes.

**Question 7: Which of the three refined models do you think is most appropriate in the devolved nations?:**

If: 'Provide new public funding for Channel 3 licensees in the nations and regions' then it is crucial the provider is within the region. The nonsense of BorderTV delivering news for Scottish Borders and D&G from Carlisle being replaced by the bigger nonsense of transferring provision to Gateshead is no solution. STV's offer to cover from Glasgow/Edinburgh is much more sensible. If that can't be agreed to then it should be open competition from within the region.

**Question 8: Do you agree with our analysis of the future potential for local content services?:**

Ultimately PSB should be bought competitively from the most able local provider. If that were to be a dedicated Scottish Channel it should be clear that it is financially sustainable and can deliver quality content tailored to the market for a full daily delivery.

**Question 9: Do you agree with our assessment of each possible funding source, in terms of its scale, advantages and disadvantages?:**

We believe this is a cogent analysis which we would support.

**Question 10: What source or sources of funding do you think are most appropriate for the future provision of public service content beyond the BBC?:**

We believe PSB should be paid for by the viewing public who stand to benefit. There are arguments for privatising the BBC, which has some extremely profitable arms and a protected advantage over commercial broadcasters. If we require commercial stations to have an element of PSB then it is only fair that they should have the same benefits as the BBC, provided they meet quality criteria. Public accountability also implies public support.

**Question 11: Which of the potential approaches to funding for Channel 4 do you favour?:**

1.44 Alternatively, it could compete for additional funding, but not be allocated any further funding by right, as in our competitive funding model.

**Question 12: Do you agree that our proposals for 'tier 2' quotas affecting ITV plc, stv, UTV, Channel TV, Channel 4, Five and Teletext are appropriate, in the light of our analysis of the growing pressure on funding and audiences? priorities? If not, how should we amend them, and what evidence can you provide to support your alternative?:**

We are very unhappy with: Scottish Borders news removal to another remote provider; with reductions in extra-London production commitments. We appreciate the severe financial pressures caused by tumbling advertising revenues for regional stations in the face of the multiplication of digital channels.

We would argue for Scottish news and cultural content to be delivered from Scotland a) because it's appropriate and b) because our creative industries talent is continually undermined by the idea that you have to 'head south to make it'. Edinburgh is the arts capital of the world and we deserve the right, along with Glasgow's core strengths in broadcasting to support Scottish made production for a fair share of national networks, not just local consumption.

### **Additional comments:**

This review offers a substantial opportunity to correct injustices in the balance of production and broadcasting allowed to Regional makers. As Blair Jenkins' Commission on Scottish Broadcasting rightly showed Scotland is under-represented, under-rewarded and so our talent drifts away in an economic migration which is entirely unnecessary. The Scottish Business community is passionate that the creative industries remain a key sector for our economy and that broadcasting is a lynchpin of that sector. We furthermore believe it is an essential playing field for matters of cultural and political significance to the people of Scotland, long neglected - see BBC's Scotland's History as an excellent example of the attempt to redress that balance so sadly missed by Simon Schama's History of Britain in which Scotland was barely an afterthought. It matters not whether you are a nationalist or a unionist, Scotland's identity is a key part of what makes the United Kingdom special and it needs not just a national outlet but a fair share of the broadcasting stage throughout the UK.