

**Question 1: Do you have any comments on the general analysis and conclusions of the report?:**

December 19, 2007

Dear James Thickett:

I have looked at the Ofcom Report on Children's Television Programming, aspects of the international research results and the recommendations of industry stakeholders, and wish to submit the following response:

I define the issue as how to encourage the production of more and better children's programming in a way that glides along existing trends rather than battling them. What is necessary is having a more rational approach to producing programming for an expanded or scaled-up audience so as to make any policy choice more efficient in its execution.

This may be a specific area in which there could be something like a multinational initiative with UK leadership?multinational as a way to achieve greater scale and mobilize more resources. Obviously, the issue identified by Ofcom is not peculiar to the UK. A multinational approach could be meaningful if it utilized already committed funds with, perhaps some matching incentive funding (yielding an attractive and innovative version of the PSP-- that makes the entire project more appealing). Ideally, charitable or foundation support might provide the incentive.

Ultimately, the goal would be to create something like a Global Children's Television Production and Distribution Development Fund. Achieving that is too ambitious to achieve in one go: in a first stage, this could be the UK, Australia, Canada plus some others, perhaps European players, perhaps India or even some contribution from China. The idea would be to have coordination in the development and distribution of new programming. In the beginning, such a fund, which could command quite a lot of money even if it merely dealt with existing commitments, might leave production to the national participants?each to its own contribution and in proportion to its own contribution, though with much preplanning and coordination so that there would be testing and distribution across national platforms for age groups and formats. In a second stage, there might be mixed production teams, though maintaining sufficient control so that there would be no challenge to the idea that it was a mix of programming reflecting national identities and programming that was designed to be transnationally available.

In a sense, this would help create a strong coordinated multinational children's programming entity (ICPE) that would have the capacity, in a structured way, to bargain with a variety of broadcast distributors. Such an ICPE could also think creatively about new windows and new technologies for the distribution of material to children, adapting or potentially transforming formats so as to recognize mobile uses, Internet uses, etc. It could lead to a dedicated international children's channel, or (in a different kaleidoscope of participants) one with distinctive European ambitions. An entity of sufficient scale could also have a greater say, in terms of multinational production and distribution, to ensure that various age groups and other needs were addressed. It could also build in modes of evaluation.

The model fits well with the Australia plan as outlined in your research report where there is an annual requirement of children's programming of which approximately one half must be 'Australian' in nature. By being a participant in such a fund, the production of the Australian programming could be so coordinated as to find useful markets elsewhere and there would be a plan for a large part of the remainder.

One question would be how such an entity would provide PSB competition for children's programming within the UK. My view would be that the BBC must be part and parcel of such an innovative undertaking to give it heft and international respectability but it should be structured so that it encourages potential competition within the UK. On the distribution side, the transnational entity would have available for distribution (though not in a command sense) the dedicated children's channels, but also the other UK channels. In terms of production, there would be a policy of assuring that a strong percentage would be produced outside the BBC and here the revised version of the PSP might make sense.

The international fund should be public service in orientation, but it should not foreclose alternative forms of funding advertising support, Internet distribution and financing and, of course, sales. Properly structured, such an entity would not reduce or diminish the commitment to UK production, while at the same time providing additional but more coordinated ways of achieving UK global leadership. This is already the case on a program by program basis, but here the strategic could be added.

Of course, many features of this kind of plan exist joint productions, cooperative agreements, binational or multinational channels, global enterprises. What is suggested is more a way of thinking and approaching the issue than a set of specifics. Obviously, too, many devils are in many details: how such a fund would be structured, what the management of it would be, how to start. There are many imperfect precedents (Arte, for example), and nothing perfect, that I know of.

Sincerely,

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and  
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**Question 2: Of the policy approaches suggested by stakeholders, which, if any, do you consider the most appropriate to address the conclusions made in this report?:**

**Question 3: If they are appropriate, should any of the policy approaches be tailored to different age groups (for example to pre-school, younger children, older children and young teenagers), or to different types of children's programming (like drama, factual, entertainment and animation)?:**

**Question 4: What is the role and importance of UK-originated programming for children?:**

**Question 5: What is the role and importance of plurality in the provision of children's programming?:**

**Question 6: Should further consideration be given to provision of public service content for children over platforms other than linear television?:**

**Question 7: Does the policy approach for children's programming need to be different to the policy approach taken to public service broadcasting overall?:**

**Additional comments:**