

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

Yes

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

This Council would like to see better coverage of regional and local news and for the South of Scotland and improved local non-news programming and is disappointed that Ofcom seems to have accepted that the separate ITV regions will disappear.

The enhanced Evolution model assumes things will stay much the same, but patently the changes to ITV as well as a multi-channel world will affect broadcasting profoundly. In that case it would seem sensible to consider either the second or third models, which introduce competition and allow ITV to find its role amongst the other commercial broadcasters, bidding for public service broadcasting funds where appropriate. There may be benefits in allowing new entrants into the public service broadcasting mix, particularly for Scotland where regional gaps might be better filled, on a more appropriate scale especially for news.

There is still something to be said, however, for trying to keep the ITV network on channel 3 where it can be found, with its popular non-news programmes as well as regional news, however inadequate we find it.

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?:

Provision of funds for Channel 4 should not be at the expense of funds for local TV services for which the regulator has carefully researched evidence of public demand across the UK and, in considerable detail, in the Border TV area.

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?:

Teletext may still have a role to play in providing information for people with sensory disabilities who do not have access to the internet.

If ITV remains and has a public service role, then simplifying its structure further is likely to impinge, once again, on the provision of regional news and local programming. In that case it would be better for these public service aspects to be delivered by other providers. Local TV could have a role in fulfilling the demand for local programming.

Ofcom should consider the discussion going on in Scotland typified by the recent parliamentary debate on the report of the Scottish Broadcasting Commission. There is a strong argument for providing a seventh digital multiplex for Scottish transmissions - this will allow local and Scottish programmes to be delivered around the whole network, to a majority of the population.

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?:

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, nations and regions news plays a very important role, especially in Scotland with its devolved structure. Funding should be found to provide this vital service. In Scotland, however, STV should provide a unified and plural service opposite BBC Scotland and public funds made available to support a more appropriate scale of local TV to replace regional TV throughout the country.

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

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

There is certainly a demand for local content in the South of Scotland as the Scottish Broadcasting Commission's and Ofcom's own research confirms. However, delivery of content over broadband is a long way from being a universal service in this rural area. Terrestrial television, with spectrum released progressively at switchover, could provide the opportunity to offer a truly local service as long as the spectrum can be provided at fair cost. Content could, however, be shared with an online platform - each medium feeding off the other. The South of Scotland should take advantage of the early start to roll-out and pioneer local TV and training provision to assist the introduction of further local channels across Scotland.

Local content has a role to play as part of public service broadcasting, especially in terms of reflecting cultural identity and representing diversity and alternative viewpoints. The lack of opportunity for local broadcasting in the past reflects the previous regulatory structure and spectrum availability. This time around, we should be encouraging communities to become more involved in how they are represented on television. Social cohesion and democratic engagement are important and are live topics in Dumfries and Galloway and across the UK. Local television can help to improve these aspects of society which Ofcom could consider under its obligations to citizens.

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

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?:

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

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?:

Additional comments: