

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

Yes, I agree that public service provision beyond the BBC is important. There are two reasons why this is important. Firstly, any organisation that has a monopoly on public funding is bound to become complacent to the needs of the public, especially it seems to the public in the English regions. Secondly, competition amongst Public Service Broadcasters may lead to programme making that is more creative and in tune with the needs and requirements of both a wider and a specific audience.

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

I do not have a strong view on any of the three models as none of them seem to address my concerns directly. The reason why I am responding to the review is that there has been a considerable decline in programme making for both TV and radio in a number of English regions in the last 10 years. This has resulted in a major decline in the plurality of regions that are represented at a national level. This decline is most noticeable on ITV and has accelerated over last 10 years. This trend has been followed by the BBC, especially in the last 5 years. There are 9 English regions, most of them have a population that is equal to or greater than that for any of the Nations, and yet only two English regions make a significant contribution to the national networks (London and the north west). For instance, in the last 2 years only one programme has been commissioned by the BBC from its Midlands region for peak time showing on BBC1. This was a documentary about Scottish trawlermen. In other words, the UK's second largest city (and easily one of the most culturally diverse) is totally absent from the peak time television schedules. The same is true over on ITV, except that the contraction of representation for all the major English regions started in the 1990's. None of the various funding models seem to address this decline. The irony is that every week, six out of ten programmes in ITV's top ten audience figures are programmes that were originally commissioned and made by the old ITV regional companies. This seems to point to a strength in both the talent to be found in the regions and the strength in having a commissioning structure that requires the regions to compete against each other in providing programmes that the public want to watch. The BBC seem to be following the ITV model of concentrating their resources in the capital and just one English region, this is a policy which I firmly believe will seriously erode the affection that the BBC currently enjoys outside of these two regions. What does the BBC do for me? How does it represent me? These are questions that current and future licence payers will be asking in many parts of England. So, whilst I agree that funding beyond the BBC is important, where and how that money is spent also needs to be addressed.

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?:

Channel 4 could innovate and fund production in the English regions and Scotland. I would favour it receiving funding directly if ITV and Five are to be released of their

PSB requirements, however if these networks retain their PSB commitments then Channel 4 may need to compete for funding.

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?:

If ITV is to be released of its public service obligations then the Channel 3 position on digital programme guides should be reserved for a PSB broadcaster. It would be unfair for a commercial broadcaster to occupy the channel 3 position if its PSB commitment is no more than that of a commercial broadcaster that is allocated channel 38! At the very least, the slot could be auctioned off to help provide the shortfall in funding that the Ofcom report seems to be pointing to for the future. However, it seems almost inconceivable to me that a commercial broadcaster could not successfully provide a regional television service. Indeed, it could be argued that the sale of regional advertising space presents a major unique sales proposition. If ITV is to retain a PSB commitment, and I hope that it does, then the regional structure should not be consolidated any further than it has already.

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?:

This is a highly complex subject and one that I do not feel able to respond to with any level of certainty. However, I do not think that the allocation of public funds can be separated from the need to ensure that drama, sport, documentaries and general entertainment should be spread more equitably across the English regions than at present. If an organisation is appointed to allocate funds then a remit for that organisation should be to encourage production of TV and radio programming in more than just 2 English regions, and the organisation should be required to publish figures that highlight where the money is going by nations AND by English regions.

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?:

I agree absolutely that nations and regions news has an important role. Additional funding may be needed for any commercial broadcaster that chooses to provide it. The problem with this is that a mechanism would be needed to ensure that all such funding will go entirely towards the cost of local news production.

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

I do not have definite view regarding which funding model is best for the devolved nations. I think that what is important that the current national channels that have been created within ITV are retained in Scotland, Northern Ireland and Wales.

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

I believe that there should be greater encouragement for the establishment of local television networks. This may require the provision of public funding, especially as 'seed' capital, and possibly an ongoing subsidy (say for local news production). Channel M in Manchester is the ideal model as it carries a wide range of interesting and topical programming and seems to have created a niche within a truly local TV advertising market. Communities in the UK would benefit by having a network of similar stations and I am sure this would be sustainable for all large and medium sized conurbations. One way to share costs and improve the quality of programming on these stations would be to create a national network for local stations to share some types of programming, say during peak time.

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

The Licence Fee is a tax by any other name. In this case, this tax would appear to represent good (if not excellent) value for money. Despite the reservations I have expressed about the decline in regional programme production, in general, the BBC's output is varied, high quality and highly appreciated. The majority of the licence fee needs to be retained for the BBC for the time being, but some will need to be diverted to other PSBs. Direct funding from local or national government can only be justified if it serves to promote national languages or if it can support local programming (rather than national network production). Sharing the cost of broadcast facilities at a regional level should be encouraged by Ofcom (the creation of Regional Media Centres for instance). I also think that PSB's should consider more co-production with similar broadcasters in other countries (Ireland would be a good example of a country that our broadcasters may be able to find some common programming ground).

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?:

Please see my suggestion in reply to Question 4.

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

If Channel 4 remains a public sector asset, then I would have no objection to it sharing the licence fee provided that it meets its PSB commitments. These commitments must therefore include an enhanced commitment to the English regions as well as Scotland. If ITV is to be released from its PSB commitments then Channel 4 could acquire the prominent EPG positions currently allocated to ITV (or these could be auctioned off).

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?:

I am opposed to the continual dismantling of what is left of ITV's federal structure. Even with the current proposals regarding local news, it appears that ITV is attempting to create some regions that are too large to be described as 'local'. The most obvious case is that of the region in which I live, where the East and the West Midlands are to be merged into one super region. ITV is not playing to its strengths and in the long term that will not be to its benefit.

Additional comments:

To conclude, I believe that the majority of English regions are suffering a decline in their representation at a national level. They are not seeing an equitable distribution of broadcasting spend either from the licence fee via the BBC, or a fair return from regional advertising spend. This is of huge detriment to the regions and to the broadcasters.

In what other country in the developed world have we seen a decline so marked that the second city has been virtually obliterated from the broadcasting map? The only time you now see Birmingham on either BBC or ITV is on their weather maps. I strongly urge Ofcom to ensure that broadcasting expenditure is not concentrated in one or two English regions and to return us to a regional plurality that will help to ensure a variety of PSB programming. Two ways to do this are to stipulate WHERE funds are being spent and to demand that the PSBs publish their outputs on a region by region basis - this should already be a requirement for any PSB, especially those that require public funding. A commitment to the regions should be more than just words.