Ofcom Consultation ‘Licensing Local Television’ - South of Scotland Alliance’s Response

The South of Scotland has been poorly served for both regional and local news services for some time.

In response to the ‘Licensing Local Television’ consultation, dated 19 December 2011, the South of Scotland Alliance has stated in previous Ofcom and DCMS consultations, that in order to achieve the greatest buy-in from the viewers, local TV would have to be part of a network. However, this network should not be UK-wide, but Scotland-wide with local channels, broadcasting from Scotland’s rural and urban transmitters throughout the day, as demand identifies. Both the infrastructure and the demand exist within Scotland to allow this to occur.

The Scottish Government recognises the potential benefits of local television, however, it must view the Ofcom Consultation document ‘Licensing Local Television’ potentially as a missed opportunity for Scotland. The document is flawed as it does not consider the Scottish Parliament’s proposal of establishing a new national broadcasting institution such as the Scottish Digital Network (SDN), or for a Scottish ‘mux co’, which would deliver to the local areas as well as the cities. A Scottish ‘mux co’ should be looking at broadcast and broadband as delivery methods of the product.

Ofcom’s previous research document ‘Indicative locations for local televisions multiplexes’ suggested that there are 9 different locations in Scotland which could host local television services. These locations did not include the South of Scotland, despite the fact that geographic interleaved spectrum is available in the South of Scotland.

The South of Scotland Alliance is supportive of a Scottish ‘muxco’ that enables the establishment of a network of successful and high quality local TV services to operate within its framework, delivering locally throughout Scotland. This network would benefit from a skilled workforce, Scottish Government support and a dedicated number of viewers.

The Scottish ‘mux co’ would be able to deliver the spectrum in Scotland, in support of the Scotland-wide interest expressed in and being planned for local TV supported by the Scottish Local Television Federation. The UK’s local TV requirements are different from those of Scotland. Furthermore Scotland has the capacity and mix of rural-urban identities that require a different solution from one currently on offer from the UK Government.

The Scottish ‘muxco’ would be able to address the specific transmission requirements of local TV services in Scotland and relate these to universal local TV ambitions by encouraging roll-out of superfast broadband to enable TV’s migration to IPTV while, seeking support, where necessary, for the introduction of relays, especially where significant delay in broadband capacity is expected.
The Scottish ‘muxco’ offers a hybrid solution of a broadcast-broadband strategy which also reflects local TV proposals from throughout rural Scotland, and offers a joined-up and co-ordinated approach in the process.

The Scottish ‘muxco’ must encourage local TV services on all platforms to be interlinked and for channel content to be aggregated where appropriate for forwarding across broadband and up to DTT servers. It is vital as broadband is rolled out, to dovetail the addition of local relays with IPTV roll-out and to engage with Scotland’s economic enterprise and broadband companies on behalf of local TV interests.

The South of Scotland Alliance supports the idea of either a Scottish Digital Network (SDN) or a Scottish ‘muxco’; however, the service would have to be available via public service broadcasting (PSB) in order to ensure that it reaches all of the relay transmitters across the South of Scotland region and other rural areas across Scotland.

The SDN’s final report stated that “If only one initial (local television) licence in Scotland is to receive public support then a strong case could be made for the South of Scotland, which in recent years has lost its distinctive regional news service from Border TV”.

The Scottish Government must put a strong request to the UK Government to identify (through Ofcom and Arqiva) how much engineering work on relay transmitters would be required and the cost of this for the South of Scotland and the rest of rural Scotland. 47% of the South of Scotland population is dependent on relay transmitters, which makes this a significant issue.

Scotland has more access to free spectrum than other areas in the UK and there is the argument that the Scottish Government should have a say in the allocation of this spectrum. In order to reach all of the South of Scotland population, the Selkirk transmitter must also be included in addition to the Caldbeck transmitter and the associated relays.

Local councillors in both Scottish Borders and Dumfries and Galloway passed motions in support of local TV services that give universal coverage.

Ofcom has previously announced that when the ITV licences come up for renewal in 2014, their preference would be for the STV service to include the South of Scotland. There is however, no detail in the announcement that would lead us to believe that any STV service would include programming specifically directed ay at South of Scotland audience. We fear it would still in effect be Glasgow TV. Sparse rural areas need local TV more than the cities because of the age of the population and, more importantly, the difficulty of travelling because of the cost of fuel or the lack of public transport. That creates social isolation which could be reduced by local TV providing public service information to a scattered population. However, as time has moved on, ITV may no longer wish to relinquish the Border TV service and ITV may bid for STV position themselves, which does not look encouraging for the South of Scotland.
If Glasgow receives the public sector support, the UK Government is effectively funding the one area in Scotland that doesn't need the monies and is currently considered to be the most media-rich location in Scotland. It would not be prudent to spend UK licence fee money on an area which needs it least.

The UK government, in its Localism Bill, has made it clear that it wishes to see services decentralised and be as local to communities as possible. That is not the experience for people in the South of Scotland as far as the current TV framework is concerned and the proposed local TV framework fails to put that right. Local TV programming needs to reflect a community’s voice and culture.

We do agree that in the long term, many local TV services could be provided over a good broadband service and that any local TV in the South of Scotland should look to a multi-media approach.

Whilst other areas can look to the internet for online television services, the South of Scotland has a long way to go before a substantial proportion of the population have a broadband connection of sufficient bandwidth or indeed any broadband connection at all. The South of Scotland Alliance has plans to try and fill the gap that will remain even after the roll out of superfast broadband and does see local TV being a multimedia beast with channels available on both terrestrial TV and broadband. The South of Scotland is working with Scottish Government to begin the rollout of superfast broadband and the funding is becoming available to those in a position to deliver i.e. South of Scotland. Even if better broadband can be rolled out to the majority by 2015, the technical solution for many people in rural areas may provide only a basic service. Whilst superfast broadband (where it is available) may allow for IPTV as a linear service, this will only be a good alternative if there is a devoted broadband channel so that the video streams are not subject to contention by other services such as email and telephony.

So the market fails our region both for terrestrial local TV and for broadband. For this reason we have previously suggested that local TV in our region required central government funding as part of public service broadcasting.

**Wider Benefits of SoSTV**
SoSA’s TV working group wishes to develop, promote and support the business model for the rollout of a comprehensive series of local TV stations covering Scotland.

A consortium was ready to bid to be an IFNC in the previous government’s local TV news plans. Those commercial interests spanning South of Scotland and Cumbria may still be willing to consider a bid for local TV under a different framework. However, there is a possibility that a social enterprise would be a better option for an area of low population density.

Training of new staff will form an integral part of the operation, and an option exists for on-the-job experience to constitute formally to the missing postgraduate level of media training between current courses and network media employment.
The two Local Authorities could use SoSTV to deliver public communication. They would pay for the airtime, which would result in budget efficiencies within public sector service delivery. SoSA believes that local broadcasting could be an essential contribution to further modernising of public sector service delivery and targeting information, especially in areas recognised as being in the ‘final third’ of country for Next Generation Access (NGA) broadband and therefore currently denied recognised distribution channels.

SoSA also believes that the Local TV project will support social equity and economic development across the South of Scotland. It will support the dispersal and embedding of content producers in the rural economy, and would become an essential local service to rural areas.

Multimedia business and skills development are key elements within this project and will be subject to more investigation with the Further Education and Higher Education establishments, as well as the local newspaper companies, as this project is seen as an opportunity for the development of existing talent and skills, and also for new entrants to the industry.

Discussions are also underway with the healthcare services, to review the possibility of public sector efficiencies through the use of local TV. It is expected that the healthcare services will continue to require to disseminate large quantities of information to the public, which can only be enhanced by access to digital platforms e.g. television, internet. Other broadcasting benefits include the targeting of emergency service information.

In conclusion, it is clear that the “Muxco” will be very important to the delivery of local TV. It is therefore essential that company or consortium appointed to run it is able to deliver effective transmission services across the UK. For these reasons, the South of Scotland Alliance believes it is essential for a separate “Scottish muxco” to be established.