

Ed Richards
Chief Executive
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

4th December 2008

Dear Ed

PSB Review

We are writing on behalf of the National Union of Journalist's Parliamentary Group (NUJ PG) in response to Phase Two of the OFCOM Review of Public Service Broadcasting (PSB) and to support the NUJ submission on the future of public service broadcasting. We believe the NUJ's submission to be a comprehensive one, containing key arguments on behalf of those that work within the industry and which we urge OFCOM to consider fully.

You may be aware that the NUJ Parliamentary Group was established on a Cross party basis. We meet regularly, along with the union (which represents 35,000 journalists in the UK working across all sectors of the media) to discuss areas of interest within the media industry.

We would like to register concerns at OFCOM's decision to allow ITV to reduce the minimum requirements for nations and regions non-news programming in England, Wales, Scotland and Northern Ireland. We understand that these proposals would mean that regional news would see the loss of 429 editorial posts and that although OFCOM's final report is not due to be published until 2009, ITV has gone ahead and has begun making the cuts in the expectation that the proposals will not change as a result of the consultation. Whilst we appreciate that you are keen to keep ITV committed to its status as a PSB provider, we are extremely concerned that the actions that ITV have been allowed to take undermines the outcome of the PSB consultation and its integrity as being genuinely open-ended.

Regarding the future of public service broadcasting, The NUJ Parliamentary Group believes that the BBC should remain the cornerstone of public service broadcasting in the UK – and it alone should be in receipt of the licence fee. Therefore we firmly oppose any proposals for top-slicing the BBC licence fee as a means of making public money available to commercial broadcasters being raised as an option.

However we also believe that there should be public service provision and funding beyond the BBC and in the first instance this should be across all existing public service broadcasters.

Of the three models subject to consultation we believe the enhanced Evolution model represents the best choice. Whilst it meets the majority of the effectiveness tests set out by OFCOM, in particular in relation to reach and impact; plurality; value for money; and audience support, we also believe that amendments should be made to this model in order

to build in sustainable support/funding in respect of the nations and regions and the provision of regional and local news, current affairs and non-news programming, all of which are highly valued by audiences. In any enhanced Evolution model it is important there is strong provision for local news and not just regional news.

We also agree with the NUJ that a plurality of funding mechanisms may be necessary, although we believe that the use of regulatory assets should be maximised. Further research should be carried out on industry levies and their potential to help bridge the gap.

Overall, we believe that the NUJ, and the other trade unions representing staff working within public service broadcasting, should be central to future discussions and debates.

We hope that you are able to take these points into consideration during your deliberations on the PSB review.

Yours sincerely



Austin Mitchell MP
Chair, NUJ Parliamentary Group



John McDonnell MP
Secretary, NUJ Parliamentary Group