

# Public Service Providers: A New Role for Public Service Broadcasters in the Online Era

A response to Ofcom's Consultation on *Small Screen, Big Debate*, March 2021.  
Ofcom's Fourth Review of Public Service Broadcasting (2014-20)

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## PART ONE: THE CONTEXT

### **New Technologies & the role of TV**

*This introductory section outlines some of the key technological and regulatory changes that form the background to the current Ofcom consultation. It is intended to identify some of the 'bigger picture' questions likely to affect political and regulatory decisions over the coming decade. These decisions, in turn, will affect the choices available to listeners and viewers in the United Kingdom. The key question is the extent to which the impact of the internet on broadcasting will shape, enable or limit these choices.*

- 1.1. The 20<sup>th</sup> century discoveries that led, via digital computing, to the creation of the internet and the World Wide Web have revolutionised human communication and access to knowledge. In theory this Web places individuals in control of their search for knowledge or entertainment.
- 1.2. By contrast the discovery of the electromagnetic spectrum, a century before the internet, led to the invention of broadcasting, the portable radio, the roof top aerial or satellite dish and the creation of a new *one-to-many* system of communication. Power lay with those in control of the microphone and the transmitter system, acting under the watchful eye of politicians. This new 'one way system' and its audio-visual variant – television - was to become one of the most powerful means of disseminating information and entertainment in the 20<sup>th</sup> century.
- 1.3. By 2020 the open frontier freedoms of the Web were coming under increasing scrutiny and the supply of key information at election times has attracted the attention of politicians. Along with the issues of child safety, copyright violation, safe networks for international crime and the application of algorithms that could interfere with individual choice, western governments began to consider intervention in what was previously considered the untouchable arena of internet-based 'free

speech’. Australia was the first country to legislate for violations of news copyright on social media, the US Congress grilled the most senior people from Google and Facebook and the UK came up with an ‘Online Harms’ Bill currently under consideration by Parliament.

- 2.1. How does the technology and cultural role of television now ‘fit’ in relationship to the overwhelming power of the internet and in relationship to the prospect of spectrum scarcity, as mobile service providers and others require greater access to spectrum space?

In the UK all public service broadcasters (PSBs), as recently as 2020, were compelled to relocate their transmission signals from the Ultra High Frequency spectrum at 700MHz down to the UHF frequencies in the 600 MHz band. This was a complex engineering job requiring work on transmitter masts across the UK and financed by Government. It took three years to complete and was undertaken in order to free up more spectrum for mobile operators. It is a tribute to civil servants, regulators and engineers that audiences receiving their TV signal from a roof top aerial (and not via a cable or satellite subscription) remained largely unaware of the process. However, since these UHF frequencies are highly prized by both broadcasters and mobile operators, and since there appears to be no alternative suitable spectrum for broadcasters should they be required to move a second time, there is now concern from viewers that a time might come when no spectrum will be allocated by Government for free TV.

As indicated above this ‘free-to-air’ TV (making use of the airwaves or ‘spectrum’ without a scrambled or encoded signal) is currently delivered via a roof top aerial; Freeview and Freesat provide the platform to deliver these signals into the home. If continuing access to suitable spectrum were to be denied in the UK, in the future, the principle that PSB services should be available to all - on a ‘universal’ basis and free at the point of use - could come to an end (DCMSa 2020; DCMSb 2020: 2B; Harvey 2021).

- 2.2. In the early days of Freeview - launched by a BBC-led consortium in 2002 - the only cost to the consumer was the one-off purchase of a set top box and the availability of a rooftop aerial. This service was launched to provide a non-subscription route for the reception of digital TV signals at

a time when BSkyB/Sky was the only broadcaster already offering this reception, though only through a subscription gateway (Dyke, 2004: 183-187; Starks, 2007). Later, as many TV manufacturers incorporated the Freeview technology into the television set, the set top box was no longer needed.

- 2.3. Some have argued that the universal availability of broadband (once this is achieved) could provide a better solution than a spectrum-based service for the delivery of PSB. That is not the view taken in this submission. As long as internet access is based on the payment of subscriptions – regular bills to individual homes – this system cannot guarantee universal availability and access. As regards the social impact of current fixed line broadband costs, an Ofcom study in 2018 indicated that ‘around one in ten adults have had difficulty paying for communications services’, that ‘just under half of older (75+) consumers do not have home broadband’ and that in lower income homes (‘DE households’) 29 per cent were ‘mobile only’ with no separate fixed line broadband. Even if the mobile were a smart phone this would make watching broadband TV – on a mobile phone – difficult; and shared or family watching on a smart TV would be difficult though not impossible (Ofcom 2018a and 2018b: 6, 4, Annex 1 Table 1).
- 2.4. Over time, Freeview and Freesat have emerged as one of the quiet success stories of British broadcasting, chosen by households either satisfied with the range of programmes available from the PSBs along with many other licensed and free services, or who could not afford the cost of a subscription service. Conversely, many have benefitted from valued subscriptions, perhaps especially for live sport, movies and US drama. But the trend in favour of Freeview has been arguably remarkable as the figures below demonstrate.

*Take up of delivery platforms in 2004 (number of homes)*

Freeview:	4.6 million
Sky satellite subscription:	7.3 million
Cable subscription:	3.3 million

*Take up of delivery platforms in 2020 (number of homes)*

Freeview:	17.01 million
Freesat:	1.07 million
Sky satellite subscription:	8.38 million

Cable subscription: 3.98 million

Note: some homes make use of more than one method for accessing TV services (Ofcom 2005:246; BARB 2020b).

By 2020 the Freeview platform was providing access to some 85 free-to-view TV channels, including all the PSBs and their associated or ‘portfolio’ channels.

- 3.1. It is unfortunately the case that political parties and politicians have disagreed, sometimes strongly, about the value or necessity of public service broadcasting and how to pay for it. For example, a 2020 article in the *Sunday Times* reported: ‘Downing Street turned on the BBC last night – vowing to scrap the television licence fee and make viewers pay a subscription’ (Shipman, 2020). These long-lasting disagreements about services currently free at the point of use provide an unavoidable backdrop to the current Ofcom Consultation.

The 2020-21 Consultation is the fourth such major review conducted to fulfil a requirement in the 2003 *Communications Act*. And while there is general agreement that this law now requires updating it nonetheless contains much still relevant detail. Sections 264, 279 and 320 of the Act remain of especial interest regarding the characteristics of PSB. Section 264 outlines the general ‘remit’ for public service, with an emphasis on ‘maintaining and strengthening the quality of public service’, with programmes likely to ‘meet the needs and satisfy the interests of as many different audiences as practicable’, demonstrating ‘professional skill and editorial integrity’ in the making of programmes along with the facilitation of ‘civic understanding, and fair and well-informed debate on news and current affairs’. In order to meet the needs of different audiences, the law outlines a required range of different genres. These included: drama, comedy, music, current affairs, sport, the arts, science, religion, ‘matters of international significance’ and programmes for children.

Sections 279 and 320 deal with News and current affairs. These programmes should be of ‘high quality’ and impartial; they should deal with ‘both national and international matters’ and be provided in peak time. In addition, the ‘views or opinions of the person providing the

service’ should be excluded and ‘undue prominence’ should not be given to the ‘views and opinions of particular persons or bodies’. This prohibition on ‘undue prominence’ for particular opinions was required especially in respect of ‘matters of political or industrial controversy’ and regarding ‘matters relating to current public policy’ (Section 320). The Act required there to be a fair and open field in presenting current controversies without the kind of editorialising that remains a prominent feature of the newspaper sector. This legislative approach to broadcast news can be traced back to the introduction of the first commercial television in the UK in the mid-twentieth century. The 1954 *Television Act* required news to be presented with ‘due accuracy and impartiality’ (1954: Section 3 (1) c; *Communications Act*, 2003).

- 3.2. The 2003 Act, in supporting the universal availability of PSB services, also requires that these services are made available to audiences whose main way of watching TV is via a ‘locked’ platform such as a cable or satellite subscription service. Both parties have to agree to this (the PSBs and the subscription providers).
- 3.3. Subsequent viewing figures indicate that the PSBs seem not to have suffered as a consequence of the various obligations laid upon them by the legislation. Some 15 years later, in 2019, the full year figures for percentage share of the total TV audience showed that four of the five top slots were occupied by the PSBs with the fourth place going to Sky’s subscription satellite service. The percentage share of audience is as follows:

*Top seven broadcaster groups by percentage share of audience in 2019*

BBC:	31.0%
ITV:	23.4%
4:	10%
Sky:	9.7%
ViacomCBS	9.6% (owners of Channel 5)
UKTV:	4.4%
Discovery:	4.3%

(BARB, 2020c: 29)

- 3.4. Ofcom's current Consultation includes a useful 'Annex 8' that outlines much of the regulatory framework derived from the 2003 Act (Ofcom 2020d). This Annex uses the term 'Public Service Providers' and it is this term 'providers', not 'broadcasters' that arguably disposes of the limitation associated with any one method or mode of delivery. Thus broadcast, internet, web site, satellite, cable, live, 'catch-up' etc. would all be included as a legitimate part of the PSP/PSB offer. **However, the 'providers' term also arguably has the merit of seeing a vital and necessary link between the character of the services and the principles and priorities of the institutions that provide them.**
- 3.5. It is the view of this submission that the term 'Public Service Provider' (PSP) – in the context of discussions about large scale audio-visual and radio communication - is now the most useful term to describe the current six public service television broadcasters. These broadcasters, recognised in law as PSBs, are currently: the BBC, ITV, STV (Scottish Television), Channel 4, the Welsh Fourth Channel (S4C or Sianel Pedwar Cymru) and Channel 5. In respect of UK audience share it is important to note that STV transmits to audiences in Scotland and S4C transmits in the Welsh language to audiences in Wales; as a consequence of this they might be expected to have smaller audiences when compared with the other UK-wide providers. Three of the PSBs - ITV, STV and Channel 5 - have private owners and shareholders and are free to move away from the PSB/PSP requirements, benefits and responsibilities if they wish.

**At the present time the term 'Public Service Provider' (or 'Public Service Broadcaster' because this is still the most familiar term) should be used solely to describe the output of these six organisations. They are at present, collectively, the authors of public service communication and no brand substitution should be attempted by expending public resources on, or offering particular legal benefits to, other providers.**

This statement above provides an answer to the last question in Ofcom's consultation - Question 7 - requesting views on 'opportunities for new providers of PSM' ('public service media'). In effect the 'Public Service Provider' statement offered above proposes that only the current six PSB organisations in the UK should be considered to be public service providers. The main reason for this is that consistent branding of these providers - as organisations committed to offering impartial news of a

high standard along with other innovate and diverse programmes - assists viewers in finding this content.

- 3.6. The issue raised by Ofcom concerning a possible open competition for use of ‘contestable funding’ (that is, open to all comers and not only to organisations already defined as PSBs) should only be considered if
  - (1) the BBC is in receipt of a licence fee or other payment that is at least equivalent to the amount of public funding it received in 2010 in real terms; and
  - (2) this contestable resource should only be available to PSPs/PSBs as spreading this resource more widely would make the work more difficult to find.
  
- 3.7. Ofcom’s use of the term ‘Public Service Media’ (PSM) is arguably a confusing one as it fails to look behind the scenes at what causes companies or organisations to act in particular ways. The communications regulator licences a surprisingly large number of channels – in the hundreds - from Bloomberg to Russia To-Day (RT), and from Al Jazeera English to Sky and the Paramount Network. None of these operate under the sort of detailed programming requirements outlined for the British PSBs in the 2003 *Communications Act*. Some may produce - for example – original high-end drama, well-resourced nature programmes and impartial news. But they are not required to do so and the need to operate profitably could lead to them dropping these more expensive types of programmes and opting for cheaper ‘bought in’ material. The PSBs must also ‘cut their coat according to their cloth’ but with cultural and social objectives that have legal underpinning.
  
- 4.1. Part of the current challenge to – but also the potential support for - the PSPs/PSBs comes from the technology of the ‘smart TV’, engineered to offer a seamless connection between the internet and television and to facilitate the growth of Subscription Video on Demand (SVOD). As an indication of the perceived ‘direction of travel’ some smart TV remote control devices gave their arguably most prominent button to Netflix. Many viewers found cheaper ways of going ‘smart; that did not involve the purchase of a new TV set, but by 2020 Ofcom found that 57 per cent of homes had a smart TV (Ofcom, 2020g: 12).
  
- 4.2. One early encounter between the internet and television resulted in the launch in 2007 of the BBC’s iPlayer. This offered the first online ‘catch-

up' service as an alternative to the video recorder, in the UK, and provided a free and relatively modest addition to the dominant 'live' TV system. Then in 2012 - the year of national switchover from analogue to digital TV - a new but online pay-TV brand, Now TV, was launched by the long-time subscription satellite provider, Sky. However, it was the launch of Netflix in the UK in the same year, 2012, that attracted the greatest attention, to be followed later by the other major US online streamers: Amazon Prime Video in 2014 and Disney in 2020. Ofcom indicates that by March of 2020 - the beginning of the Covid-19 lockdown in Britain - the subscription-based streamers, or SVODs, were present in 53 per cent of online UK homes. This figure rose to 60 per cent of homes by the end of 2020 with 17.5 million subscribers (Ofcom, 2020a:5; *Which?*; BARB, 2020a). With global market ambitions and subscription costs of around £6 to £8 a month, the SVODS are nimble and attractive operators when compared with the roughly £50 a month paid by Sky subscribers (Sweeney, 2018).

- 4.3. The emergence of the iPlayer, prior to digital switchover, demonstrated that the BBC was then capable, technologically and creatively of taking an initiative that would be influential in relationship to both other PSBs and other providers. Ampere Analysis researched the top five most used online services for watching video in early 2019 (in the UK, the USA, Germany, France, Spain and Denmark). They found that in Britain the iPlayer was the most popular; while in the other four countries Google's YouTube occupied the top spot. Moreover, three of the UK's public service providers (BBC, ITV and Channel 4) – according to Ampere - had players in the top five most used online services. These figures, if correct, record a significant level of interest in the UK in watching time-shifted programme material from the PSBs in particular, at a time when there was much else to choose from among the offerings of a growing SVOD sector (Ampere, 2019: 7).
- 4.4. There is also increasing evidence of the PSBs experimenting with different ways of attracting viewers to their online player services and moving away from what have now become the relatively old but not yet superseded concepts of 'catch up' on the one hand and 'live TV' on the other. Channel 4 has become well known for an advocacy of online box sets available for binge viewing. Channel 5 (now owned by ViacomCBS) has found a niche in historical and royal family-focused programmes, and the BBC has experimented with releasing programmes or episodes –

during or after first ‘live’ release. Thus the art of promoting or showcasing ones best programmes has discovered arguably more than one showcase to use. Early 2021 has seen examples of drama series released by several PSBs in their entirety as box sets available via the online Broadcaster Video On Demand (BVOD) service *at the same time* as the release of their first episode on live or linear TV (BBC’s *The Serpent*, ITV’s *Finding Alice* and Channel 4’s *It’s a Sin*) (Price, 2021: 50). There is also the prospect of more material made for exclusive BVOD use.

- 4.5. Rising interest in using the free PSB players during the 2020 Covid-19 lockdown period – both for ‘catch up’ and to explore new material - has been quite well documented. Though it should be noted that the ease of searching or ‘browsing’ a PSB player catalogue is in need of urgent improvement if these players are to compete with the SVODS.

Ofcom’s data on exceptional ‘lockdown’ viewing - at an estimated average of 385 minutes (or well over six hours) per day - sees the largest single component of time devoted to live TV for a total of 178 minutes. This is followed by estimated averages of 71 minutes per day spent with the SVODS, 48 minutes devoted to You Tube, 37 minutes spent with the older technology of Recorded Playback and just 12 minutes on average devoted to Broadcaster Video On Demand (BVOD). The large amount of time (an estimated average of 71 minutes a day) spent with the SVODS is notable. It remains to be seen in a period of general return to work how the relative popularity of SVOD and BVOD services may change. But there is no doubt that the rapid take up of the SVOD services could significantly change the UK’s viewing landscape. (Ofcom 2020a: 7-8).

- 4.6. In addition to the freely available PSB online services, the BBC and ITV have together launched a subscription service in the UK: *Britbox*. From November 2019, at a monthly cost of £5.99, this service carries programmes from BBC, ITV, Channel 4 and Channel 5. The launch follows the appearance of a similar service of the same name in the US in March 2017. The North American service (US and Canada) was reported to have attracted 1.5 million subscribers by October 2020. While the UK service – in a significantly smaller market - was reported to have met its initial target of half a million subscribers by March 2021 (*Hollywood Reporter*, 2020; ITV Press Centre, 2021). One notable feature of the

catalogue is the inclusion of a Britbox original – a first revival of the popular ITV satirical series *Spitting Image* which ran from 1984-96.

- 4.7. Ofcom’s study of the Covid 2020 lockdown period, highlights what they consider to be the relatively small amount of average time devoted to watching the free BVOD services in the UK during the first 2020 lockdown (Spring 2020), Enders Analysis approaches these matters from a different angle. The latter’s *Silver Linings* report of July 2020 places more emphasis on the opportunities for younger viewers to find and explore the online offerings of the PSBs, motivated in part by greater lockdown exposure to the PSBs live output. All PSBs have benefitted, they argue, but the BBC slightly more so in respect of the documented increased viewing to their broadcast channels by 16-34 year olds. This, Enders suggest, successfully showcased PSB output ‘further than any ad campaign could’ and drove further take-up of BVOD services:

...iPlayer had its biggest ever day (10 May) with 22.5 million requests...All 4 had its highest daily, monthly and quarterly views ever. My 5 had its strongest week of viewing ever for the week starting April 27, with 5 million views. (Enders, 2020: 3-4)

In respect of the glass half empty or glass half full approach to the ability of the PSBs to compete effectively in the SVOD era, and the critical role that younger viewers may play in the process, it’s worth noting some findings of the Ofcom 2020 ‘omnibus survey’ on attitudes to PSB. Based on research completed just before the first Covid-19 lockdown, this study explored some differences of opinion between 16-24 years olds and those aged over 54. The younger group placed relatively greater value than their elders on reflecting the ‘diversity of the UK’ and on ‘services which are available to everyone’. These two issues are arguably a ‘good match’ with the values and output of the PSBs and this research might, therefore, suggest a potentially powerful role for the PSBs sector. Though ‘break-through’ to a young audience will clearly not be easy, given the range of choices available from You Tube to the SVODS (Ofcom, 2020: 5).

- 5.1. The number of SVOD subscriptions compared with the number of homes using a free PSB online service is worth exploring in more detail. In the UK, Ampere estimated that by 2018 Netflix and Amazon Prime had the largest number of subscribers with 9.9 million and 7.7 million subscriptions, respectively, while the flexible and online Now TV service

received an estimated 1.5 million subscriptions (their parent company Sky, offering an encoded and live satellite subscription service, did significantly better than Now with some 9.6 million subscribers in 2018, Sweney, 2018) (Ampere, 2019: 7). The reach of the US SVODS increased, of course, during the lock-downs of 2020-21 though no robust viewing figures are yet available to compare with the wealth of data on UK television audiences compiled by BARB. Disney Plus launched in the UK with perfect lockdown timing on 24 March 2020 (Whittock, 2020).

As noted previously Ofcom explored the general popularity of the SVODs in its account of the estimated breakdown of viewing time per day in the 2020 lockdown, using what are still ‘unmatched’ or effectively unaudited figures. ‘Unmatched’ includes a variety of TV screen-dependent activities including games, as well as You Tube & SVOD-viewing (details of estimated daily lockdown viewing time are given in Section 4.5. above).

- 5.2. For the year 2018, Ampere sought to provide more detail on the activities of the British PSBs in developing their free BVOD services. They find that the free online BBC iPlayer was being used in 13.4 million homes with the other three PSBs - ITV, Channel 4 and Channel 5 - having players that were used in, respectively, 8.8m, 6.8m and 4m UK homes (Ampere, 2019: 8). These are all pre-lockdown figures and are likely to have increased by the end of 2020. But they indicate that the PSBs were slowly (maybe too slowly) growing the number of viewers for their programmes by means of new online services.
- 5.3. In contrast to the growth of online TV services, Ofcom also explores the performance of live TV subscription income – a category that includes cable and satellite activities in the UK with Sky as the largest operator. This subscription income has been falling even if slowly, from £6.70 billion in 2016 to £6.28 billion in 2019 (Ofcom, 2020c, *Communications Market Report*, online supplement: TV Revenues). By the summer of 2018 this change was so marked that the regulator noted it in an online posting headlined: ‘TV streaming services overtake pay TV for first time’ (Ofcom, 2018c). The following year researchers at Ampere also noted this development in a more muted way: ‘SVOD services can be both complementary and substitutive to pay TV’ (Ampere, 2019:5).

**The prospects for PSB providers should therefore be considered not only in the light of SVOD impacts but also in the context of a possibly diminishing live TV subscription sector.**

6.1. Sections 1-5 above have explored a variety of challenges faced by British broadcasting in the 21<sup>st</sup> Century: the role of the PSBs, the consolidation of successful satellite and cable subscription services, the transition from analogue to digital and the unanticipated success of Freeview in providing a new TV platform for households looking to manage the transition from analogue to digital services. This success (along with the supply of attractive programmes) helped to sustain a decent share of the audience for the PSBs.

Section 6 explores some past and continuing challenges to the PSBs in terms of audience share and the factors affecting viewers with respect to age and gender.

6.2. When BBC television faced its first competitor with the launch of ITV in 1955 it lost more than half its audience, only gradually clawing this back over time and arguably benefitting from ITV's creation of a different kind of TV - more friendly, more dazzling and with less of an upper-middle class tone in presentation. (Sendall, 1982; Briggs, 1995). The *Broadcasting Act* of 1990 introduced more big changes, principally the introduction of a new satellite subscription service (BSkyB/Sky) offering choices that attracted audiences in new directions.

By the late '90s the older terrestrial players, the BBC, ITV and Channel 4 - along with the relative newcomer Channel 5 launched in 1997 - were to face another reported 12 channels coming on stream. By 2019, thanks to digitisation and regulatory enablement, the stream had become a flood with a new total of some 330 competing channels (BARB, 2021a). Some of these were the 'portfolio' or subsidiary channels more recently created by the 'old guard' of the twentieth century. But between them all the newer channels were taking just under half of all viewing time or 45.31 per cent of the total (*Broadcast*, 20<sup>th</sup> March, 2020: 22). The list below shows the viewing share for the top seven performers of all licensed channels (not groups), old and new, in 2019. These figures, the outcome of BARB research, are illuminating but arguably lacking context as we do not yet have access to SVOD viewing figures for their as yet unmeasured or 'unmatched' viewing time in the UK.

*Top seven television channels by percentage share of audience in 2019*

BBC1:	21.92%
ITV1:	17.82 %
BBC2:	5.67 %
Channel 4:	5.29%
Channel 5:	3.99%
UKTV Drama:	1.3%
Sky Sports Main Event:	1.0%

*(Broadcast, 2020: 22; BARB, 2020c: 29 )*

6.3. As explored in Section 4.5 above Ofcom has tried to identify some of this otherwise ‘unmatched’ time devoted to viewing SVOD material during the first Covid-19 lockdown in 2020. It is proposed that, on average, SVOD-viewing amounted during lockdown to 71 minutes per day – less than the average time devoted to live TV watching (178 minutes) but more than the time (12 minutes) estimated to be spent on national and free broadcaster video on demand material (BVOD). A concern has also been expressed that as younger people (16-34 year olds) were believed to have spent significantly more time than the average on SVOD viewing (120 minutes per day as opposed to the overall average of 71 minutes during lockdown) this age-related approach might suggest a way-marker of more profound and general change (Ofcom, 2020a: 4; 8; Harvey, 2020).

6.4. However, an area of investigation not so far explored by Ofcom, and one that might bear significant new fruits, is an examination of age and gender considered as significant factors in relationship to the use of leisure time, including TV and video-viewing. In 2015 the Office for National Statistics (ONS) conducted a detailed study on the use of leisure time by all age groups. It should be noted that this kind of investigation has also been attempted by the Organisation for Economic Co-operation and Development (OECD) and agreed definitions of leisure time can be difficult to arrive at (2009).

In this context the three ONS age groups of particular relevance are the 16-24s, the 25-34s and the 35-44-year-olds. The ONS note that, in

general, men have more use of leisure time than women though the amount varies over a lifetime. And the overall life-time average for free time may suggest only a modest difference (six hours and 9 minutes for men and an average of five hours and 29 minutes for women). However, in the 16-24-year-old category – of particular interest to Ofcom in terms of peak and possibly trend setting SVOD viewing - ‘men took an average of 59 minutes more leisure time than women’ though they were slightly less advantaged in the older age group of 35-44 where they took the lesser advantage of 27 minutes more per day than women (ONS, 2015: 10-13).

The larger gender discrepancy in the younger group (significantly more free time for younger men) is harder to understand since the domestic duties of cooking, cleaning, washing and child care might be expected to be higher – and possibly more gender differentiated – in the older age groups of the 25-34s and the 35-44s.

It would not be surprising to find that, at a time of life when children arrive, both men and women have less leisure time available and the presence of babies and children in the household is likely to affect the selection of ‘what to watch’ in a multi-channel and SVOD-ready environment. Thus, although the take up of SVOD services will certainly continue, PSB services may have more of a role to play and ‘binge viewing’ may become less of an option where adult partners wish to share physical space with each other and their children. These age and gender-related differences merit further study as a contribution to understanding the actual and prospective changes in TV and video viewing in the UK.

7.1. In concluding these contextual points that provide some signposts for consideration of the current PSB Consultation, this final section examines two areas of particular strength for the PSBs: (i) their extensive contribution to the creative industries in the UK, including the value of programme and format exports and (ii) their role in producing news programmes that are widely used and to a greater or less extent trusted. A tentative contrast of the television coverage of two major news incidents one in the US and one in the UK suggest a need for further research on the links between the values of public service broadcasting, news reporting and social cohesion or social division.

*(i) The PSBs contribute to Britain’s creative industries*

The key cultural and economic contribution made by television to the broader field of the creative industries in the UK, has been widely noted. Without work available in broadcasting for actors, musicians, writers, orchestras, directors, producers and editors the UK-wide sectors in theatre, film and music would find it much more difficult – perhaps impossible - to operate successfully. The PSBs investment in first run, original content was £2.6 billion in 2018. This had fallen from £3.5 billion in 2004 though the fall is in part compensated for by an increase in co-production contributions from third parties including from the SVODS (Ofcom, 2020g: 34-36) (2).

In 2012 the Government established the first Creative Industries Council, to be co-chaired by a senior Minister along with an industry partner; in that year the first co-chair was a senior Facebook executive. By 2020 two of the co-chairs were Oliver Dowden, Secretary of State for Digital, Culture, Media and Sport and Tim Davie, Director General of the BBC. In July Davie welcomed the Government's new £1.6 billion cultural funding package, while a report produced by Enders Analysis in 2021 noted that the creative industries accounted for 6% of gross value added (GVA) to the UK economy in 2019: 'more than the automotive, aerospace, life sciences and oil and gas industries combined'. The report went on to assert that the UK's Creative Industries were '...the largest in Europe' and 'central to promoting the UK's soft power globally' (DCMS, 2020; Enders Analysis, 2021: 1).

In 2017 a more general account of the linked cultural and economic significance of public service broadcasting was offered by Sir Peter Bazalgette, former Chair of the Arts Council and current Chair of ITV. He spoke of: 'The trusted news which informs our democracy in an era of widespread fakery, the original programmes which help define our national culture and the demonstrable economic growth and international influence that flow from our creative excellence' (Bazalgette, 2017).

Finally the export value of British TV programmes and formats in 2019-20 rose by 6% on the previous year to a total of £1.48 billion. Most of the value generated in sales can be traced back to PSB investments in original production, with scripted drama as the most valuable category - accounting for '48 per cent of all revenue'. The US remained the largest market, generating 32% of UK sales, followed by France and Australia. The sale of formats also increased by 39 per cent on the previous year,

generating a modest £119 million (PACT, 2020a: Q4). It is, perhaps, evidence of the value of these exports that has been a key factor in persuading the British Government to recognise the economic value of this sector.

*(ii) News from the PSBs and some UK/US comparisons*

News is one of the most important genres for the PSBs and they accounted for nine of the top twenty sources of all news in the UK. In a hierarchy of news usage the bulletins on BBC1 and ITV regularly take the top two spots and generally TV news was preferred by 75% of those questioned compared with 65% preferring the internet and 35% the newspapers. Across several years of research ‘trusted and accurate news’ was seen as the most highly valued aspect of PSB (Ofcom, 2020i: 14; 2020j: 2-3).

With the start of the Covid crisis in 2020 news programmes that would generally peak at their highest with around 5 million viewers were overtaken on at least one occasion by an audience of nearly three times that size. So, for example, the Prime Minister’s statement on 23 March drawing an audience of 14.6 million on BBC 1 was unprecedented in size (Ofcom, 2020k:7). There is arguably an element of social cohesion that stems from sharing the same news sources used by people with very different political beliefs or none. Here the legal obligation of impartiality in broadcast news also plays a part, although there may be rather few politically active people who have not at some point railed against a BBC news item and its perceived lack of impartiality or complicity with establishment norms. But trust seems to be a key issue for most news watchers. As an anonymised female interviewee (from Swansea) participating in a study of news put it:

If you are scrolling through your Facebook news feed ... you never really know what to trust and which are the reliable sources if people are sharing news articles... You just take it with a pinch of salt. I think the BBC is a lot more reliable (Ofcom 2020i: 15).

The US has a much larger population than the UK (328.2 million people compared with a UK population of 66.8 million). And it is interesting to see both how large and how distributed across more news outlets the US audience is compared with the much smaller British one. Comparisons may be unwise but two different sorts of national crises and their television news coverage may be worth at least a preliminary contrast.

The two televised news occasions are the Covid moment already noted above in the UK and the coverage of the night of the US Presidential election in November 2020. One difficulty of the contrast is that the US situation was fraught with radical disagreement and a lack of shared reference points while the UK example could be considered a first kind of sharing in public of a great risk, albeit shared by divided political opponents. For the US, the audience was fragmented and deeply divided regarding the election and how it had been managed, with a subsequent Pew Center study noting:

...while Americans widely agree that misinformation is a major problem, they do not see eye to eye about what actually constitutes misinformation. In many cases, one person's truth is another's fiction. (Journalism.org, 2021)

The *Los Angeles Times*, reporting on the 2020 Presidential election night ratings notes an audience for Fox News averaging at 13.8 million, a CNN audience of 9.1 million, MSNBC with 7.3 million, ABC with 6.1 million and NBC with 5.5 million and with additional coverage on other channels (Battaglio, 2020). With a total of around 42 million viewers for these outlets alone this was clearly a moment of national crisis. The language used by journalists and presenters will be the subject of many studies to come but there seems to have been agreement among several commentators that Fox and CNN were in some way pitted against each other in reporting the events, in a way that both journalistic professionalism and the principle of impartiality in news reporting are designed to prevent. Here is a tangle of news reporting that cannot be easily unravelled.

## PART TWO: RESPONDING TO OFCOM'S QUESTIONS: THE 'SMALL SCREEN, BIG DEBATE' CONSULTATION

*Question 1: Do you agree that a new regulatory framework for PSM delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focused?*

This consultation response uses the term 'Public Service Providers' (PSPs) to recognise the fact that as the internet becomes more and more involved in the delivery of audio-visual material a new term may be needed to replace the term

‘broadcasters’. Though this submission emphasises the continuing vital importance of access to free-to-air television that is delivered via the airwaves – i.e. is ‘broadcast’ and not subject to the demand of a fixed, monthly broadband payment.

The term ‘PSM’ is confusing if not defined; we define it as a description of the output of the six existing Public Service Broadcasters and as subject to the PSB brief outlined in the 2003 *Communications Act*. We understand that other users of the term will wish to define it differently and in this regard definition disagreements almost certainly relate to the issue of Contestable Funding. If it is deemed desirable to create a new Contestable Fund then the money for this should not be taken from the Licence Fee payers who generally believe that their payment is an investment in the BBC’s work of making programmes. If new money can be found then eligibility and access to this resource should be limited to the six named PSPs/PSBs.

It is also the view of this submission that it is vital to retain the ethos and understanding developed by the six currently existing Public Service Broadcasters (BBC, ITV, Channel Four, Channel Five, STV and S4C). This institutional knowledge, commissioning and production practice, along with an evidenced understanding of how to attract audiences within a public interest frame of reference, must be recognised and built upon. The PSB sector has earned continuing support as it has remained self-evidently popular (audience share figures are given above at 3.3 and 6.2)

We think that the well-known ‘brand names’ of these six institutions will also assist their audiences in navigating the unlimited and challenging waters of the world wide web.

If ‘service neutral’ means that all types of content, delivered by PSBs via various media can be recognised as public service output media (from high end drama to short cartoons, from radio comedy to well-informed fact-checking and news sites, from free-to-air ‘live’ broadcast to 24 hour a day webcasting) we agree with this, on condition that law and regulation clearly specifies that designated Public Service Providers are the commissioners or producers of this work. Clearly the output available via (free) Broadcaster Video on Demand should also be included; some of this is original work and not transferred from the main broadcasting channels.

Competing (non-PSB) providers have succeeded well in attracting audiences over the last twenty years, as the leisure market continues to grow and discover new kinds of profitable services. However, some of these will have global business plans that avoid producing work to can be too easily identified with a particular

nation or part of the world. We think that UK audiences deserve to have the continuing option of free access to national services of a high standard and including fact as well as fiction, news as well as drama, with stories that address the reality of life in the UK.

This submission also supports the retention of existing quotas and types of programming or information provision including production for and in the nations and regions of the UK, for children etc. Levels of investment and amounts of original work produced should also be monitored in an appropriate way. The regulator should not throw away the keys because monitoring and standard setting becomes more challenging. It is this monitoring that has, on the evidence available, made the British PSBs also the most popular providers judged by available audience share figures.

Some monitoring and enforcement of quantitative outcomes will still be required.

It is not clear what the advocacy of a more ‘outcomes focused approach’ means unless it means, simply, that designated outcomes are not necessarily media specific and can be achieved in different ways. This should not however violate the principle of sufficient material being free at the point of use and not dependent on a relatively expensive broadband subscription payment.

*Question 2: Do you agree with our proposals for a clear accountability framework?*

We think that the assessment of qualitative outcomes as well as the use of quantitative metrics should be retained.

*Question 3: What do you think should be included in the PSM ‘offer’?*

The PSM offer as delivered by PSP providers should include much the same quota and other requirements as at present (including the generic and Nations and Regions provisions), but with a recognition and tolerance for delivery via different media. This will doubtless involve complex negotiations with the PSPs and with various platforms, gateways and remote-control devices including perhaps Google’s Alexa. As regards the principle of a public service - universal availability should be upheld and careful attention should be paid to the availability of material for households with very different levels of income. This issue of homes without broadband etc. is recognised in the SSBD Consultation document of December 2020.

In an increasingly global world there should be provision for well-resourced and impartial news, for international current affairs, for work produced for children, for arts coverage and for work that deals impartially and sensitively with religious issues. In general all the generic and subject provisions outlined in the 2003 *Communications Act* should be retained.

For all, including commercial PSBs, there should continue to be the benefit of access to free spectrum at least until 2034. We support the observation in the Consultation document that: ‘DTT is still a valued service in the majority of UK homes’ (Ofcom, 2020i: 44).

Despite some of the valid criticisms of the now rather outdated Communications Act 2003, it’s notable how many of its general content provisions, including for News, remain valid. It is also notably how much flexibility and innovation has been demonstrated both by PSBs and by the regulator – for example in different approaches to scheduling and in the provision of live and ‘catch-up’ TV services, without any new legal direction. In this respect changing technology and changing audience interests have been great enablers of change.

**The term ‘PSM’ or ‘public service media’ should only be used to refer to public service broadcasters (‘PSPs’ in the terminology of this submission) and not to other providers offering work of interest and quality; the latter are usually subscription service providers and do not offer a public service.**

It is understandable that the PSM term should emerge at a point in time when the PSBs need to do more - and are already doing more - than ‘broadcast’. However, there is inevitably concern that Ofcom’s choice of the term ‘PSM’ is intended to function as a kind of ‘stalking horse’ with a view to widening the definition to apply to some of the very large number of non-PSBs.

*Question 4: What options do you think we should consider on the terms of PSM availability?*

PSM should be available on as many outlets and platforms as practicable and affordable. The longstanding debate about the must offer/must carry rules will doubtless continue; these become an issue if the PSP/PSB services are made available under ‘locked’ terms by a subscription service. The key principle for a public service is that it should be available to all UK individuals and all households free at the point of use. This most obviously means available on Freeview and Freesat with an aerial.

There should be a careful review of the benefits of making the relatively high in original content PSP/PSB channels also available, as at present, via one or more subscription services and watchable on a variety of devices. The financial and social implications of such a move requires renewed and careful consideration. Availability of free to air services on locked platforms appears to be a contradiction in terms as - though it increases convenience of access as at present - it arguably brings limited enhancement to the universal service model. PSB services are valuable and popular and they should not necessarily be made available at no charge to commercial providers.

In addition, as regards the principle of a public service, universal availability should be upheld and careful attention paid to the availability of material for households with very different levels of income. This issue is helpfully noted in Ofcom's *Small Screen: Big Debate: Consultation* document of 8 December 2020. Here it is noted that '...around one in eight adults (13%) do not use the internet at home' and this is not only an issue for the elderly but also applies to '... 15% of working adults in the lowest (DE) socio-economic groups'. Furthermore, Ofcom notes here the importance 'well-resourced and high quality PSB channels' being available to the '... 1.5 million homes, 5.3% of the UK total, that do not have access to pay-TV, subscription streaming services, home broadband or smartphones' (2020i: 19).

*Question 5: What are the options for future funding of PSB and are there lessons we can learn from other countries' approaches?*

The Mediatique study 'Future models for the delivery of public service broadcasting', December 2020 is a substantial document but arrived rather late in the process to be properly considered here. The DCMS Select Committee report on its findings regarding PSB, including funding models, is due in March 2021. This contains useful detail on methods of funding elsewhere and offers case studies of new approaches adopted in other countries (DCMS, 2021).

The Ernst and Young study *International perspectives on public service broadcasting*, offers a useful summary of methods adopted in five countries (United Kingdom, Norway, Germany, Denmark and Finland) (2020: 5). It also sets the annual funding amounts generated for the public broadcasters in useful context by expressing these as 'total public funding per head of the population, rather than on a per household basis'. The annual per capita amounts are:

- United Kingdom: £56
- Norway: £100
- Germany: £92
- Denmark: £86
- Finland: £78

It is the view of this submission that the most promising examples come from Finland and Germany. In Finland a new system has been introduced with payments made by individuals but on a means tested and progressive scale. As a consequence of this approach those with the lowest incomes pay nothing. Businesses with above a certain defined annual turnover are also liable to contribute with a maximum amount payable specified and a component of capped payment related to the size of turnover. In Germany a new fee was established also payable by all households and businesses. Though it has been suggested by outside observers that if this household fee were to be linked to the rateable value of an office or dwelling this would be a more progressive form of taxation and could be collected by local councils (Ramsey and Herzog, 2018).

The funding of the BBC has always provided a cornerstone to the whole system of TV production in the UK. But the BBC's spend on first run, original programmes has reduced from £1.3 billion in 2014 to £1.2 billion in 2018 (2020h:35) and Government action in a period of austerity has reduced the value of the Licence Fee by some 30 per cent since 2010 (Barwise and York, 2020: 278). **It is the view of this submission that the cornerstone has been badly damaged and this affects the system as a whole;** ITV, Channel 4 and Channel 5 have also faced some difficult challenges in respect of advertising income.

Although much is claimed about the independence of the BBC from Government, it is in fact the Government that controls the funding decisions and it can therefore in many respects determine the future of the Corporation. A recent comment by the DCMS Minister of State with perhaps most knowledge of the BBC seemed to change the tone, with some positive comments at an event in 2020, in the context of the Covid pandemic, speaking warmly about the value of the service offered by the PSBs, through Freeview:

I'm also conscious that, whilst a large proportion of the population has access to Sky and Netflix and to Amazon and Disney, there is still quite a significant proportion that doesn't, and that relies on Freeview. And therefore the importance that public service broadcasters play in providing entertainment, as well as education and information, remains still very, very strong. Rt. Hon John Whittingdale (Ofcom, 2020i: 20)

The encouragement to research new funding models has brought considerable attention to the German system where a separate, independent body (the ‘KEF’ and not central government), sets the level of funding for the public broadcasters though the amount proposed has to be agreed and monitored by all the regional governments.

*Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven’t identified?*

Collaboration between the PSBs is to be welcomed and supported. The invention of Freeview and more recently the launch of Britbox UK has demonstrated that collaboration is possible. But only these organisations themselves can ‘test the waters’ of what kinds of collaboration are appropriate. As Ofcom will be aware some kinds of collaboration in the past have fallen foul of competition regulations. There is no reason to think that the PSBs of to-day are unaware of both the advantages and the possible pitfalls of working together.

*Question 7: What are your views on the opportunities for new providers of PSM?*  
The independent producers’ organisation, PACT, has suggested that:

...public service broadcasters are not the only platforms capable of delivering PSB content to UK audiences. Other platforms, including traditional multichannel and SVOD, are already supporting PSB purposes and characteristics through content like *Our Planet*, *Black Mirror*, and *Chernobyl*. (PACT, 2020: Q4)

The implication here may be that these platforms or programme producers should also benefit from public money, for example through the renewal and expansion of ‘contestable funding’.

The first two of the programmes/series cited above were funded by Netflix and the third by a combination of HBO and Sky UK. Though *Black Mirror* had a first two series financed by the British PSB broadcaster, Channel 4, prior to the rights being bought by Netflix with new and higher profile episodes subsequently financed by the latter. All three productions were made available to viewers of Netflix, HBO and Sky respectively on a normal private contract, subscription basis. All three received considerable critical acclaim and Emmy Awards.

One point of this example is perhaps to contrast the different histories and principles that lie behind the development of the television industries in the UK and the USA. With a population of some 328 million people in the US there is no doubt about the high level of resources available for production in both the film and TV industries; though the investment/business model adopted by Netflix has departed from more traditional US practice.

Compared to the relatively very small public broadcaster in the US (PBS) along with some very large companies from CBS with its origins in the interwar years to the relative newcomers HBO and Netflix, the UK TV industry had developed in a very different way. The UK regulatory environment and the BBC ‘inheritance’ that goes back to 1922 has resulted in a different approach to production, including the creation of a popular and ‘public service’ broadcasting system. Clearly this system is now both successful and still dominant but under pressure with the ‘free-at-the point of use’ approach being topped up by subscription systems both new (Netflix, Amazon Prime etc) and old (Sky).

PACT finds itself in a sense in the eye of the storm as major multinational companies beat a path into the heart of the UK production system with new ‘indies’ including three of the biggest global media companies: Banijay, Liberty/Discovery and Comcast (Broadcast, 2021: 21).

As already indicated this submission supports a ring fencing of any future ‘contestable funding’ with eligibility and potential support limited to the PSPs/PSBs as defined in this submission.

It is Ofcom’s challenging task to support the transition of the British PSB’s into this new era of television.

## **Footnotes**

- (1) Four of the six channels listed in 3.5. (ITV, STV, Channel 4 and Channel 5) are funded by advertising. The BBC is funded by the Licence Fee. S4C was originally funded predominantly by Government until 2013 when this responsibility was transferred in part to the licence fee payers (paid via the BBC) with the intention that all direct government funding would end by 2022.
- (2) The full figures for PSB spend in 2019 are available in the online Interactive Data Report that accompanies the Ofcom *Communications Market Report* (2020c).

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In memory of Professor Jay Blumler, American soldier and transatlantic scholar, generous colleague at the University of Leeds and advocate of public service principles in broadcasting (1924 -2021).