

Title:

Prof

Forename:

Robert

Surname:

Beveridge

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you agree that the existing obligations on Channel 3 and Channel 5 licensees in respect of national and international news and current affairs, original productions, and Out of London productions should be maintained at their current levels? If not, what levels do you consider appropriate, and why? :

There is a case for reviewing the obligations such that they are amended along the lines of the BBC,s commitment to consider, for example, production in Scotland to be a floor of 12% of overall commissioning

Question 2: Do you agree with ITV's proposals for changes to its regional news arrangements in England, including an increase in the number of news

regions in order to provide a more localised service, coupled with a reduction in overall news minutage? :

No. reducing the overall news minutage together with increased localisation seems counter productive and does not fully reflect, for example, ITV's own research in the Border region

Question 3: Do you agree with UTV's proposal for non-news obligations should be reduced to 90 minutes a week? If not, what alternative would you propose and why? :

No. Northern Ireland remains a distinct political and cultural entity which requires that its various communities, languages and traditions receive representation and attention, for many reasons beyond the purely economic. It is difficult to envisage how this might be achieved inside this proposal.

Question 4: Do you agree with the proposals by STV to maintain overall minutage for regional content in the northern and central licence areas of Scotland at 5 hours 30 minutes a week, as detailed in Annex 3? If not, what alternative would you propose, and why? :

Given the performance of STV in recent years and its commitment to Edinburgh in particular, this proposal commands support

Question 5: Do you agree with the proposals by ITV to maintain the overall minutage for regional content in Wales at 5 hours 30 minutes a week, as detailed in Annex 3? If not, what alternative would you propose, and why? :

Yes

Question 6: Do you agree with the proposals by ITV to reduce the overall minutage for regional content in the Channel Islands from 4 hours a week to 3 hours 20 minutes as detailed in Annex 3, while maintaining the present provision of a 30 minute early evening regional news programme? If not, what alternative would you propose, and why? :

no. retain the status quo.

Question 7: Do you have any views on any other aspects of the nations and regions programming and production obligations of the Channel 3 licensees? :

It is a very great pity that ITV seems unwilling to operate in closer partnership with STV and to broadcast the existing high quality STV provision in current affairs.

It is not satisfactory to produce research which inevitably follows the bias of the questions used to argue that there is, in the Borders, resistance to a focus on Edinburgh and Glasgow.

Given ITV's repeated comments that the cost of serving the Borders may be high and disproportionate, it become necessary to ask whether or not the proposed investment in a

political editor at Holyrood is a wise decision in economic never mind other broader terms. Surely this money could be spent on other programming to enhance provision in the Borders and it would make economic sense to take in part or in whole STV programming.

Question 8: Which option would you prefer in respect of the news and current affairs in the Border region, and why? :

My preference overall would be for an All Scotland licence and I cannot see why this could not have been organised and delivered.

Beyond this, Ofcom should ensure that viewers in the Border region receive- broadly- not only the same level of provision of news and current affairs reflecting the nation of Scotland but also the same quality so that the citizen interest- (Ofcom's FIRST statutory duty) is met by viewers having full access to the same debates and coverage as that enjoyed by citizens across Scotland on channel 3.

Question 9: If option 2 were to be adopted, should ITV be required to provide separate transmission for the Scottish and English parts of the region on DTT? :

YES

Question 10: If you would prefer a different option to those set out in Questions 8 and 9 above, please explain what, and why:

Question 11: Do you agree that the Border licence should be amended to reduce the proportion of regional production required to a sustainable level? If not, what proposals would you like to make? :

NO. The arguments for sustainable are founded on the economic alone as opposed to the overall requirements to deliver public service broadcasting in the public interest. If STV can largely achieve this within a smaller resource envelope and market, so too can ITV

Question 12: What views do you have on the proposal by STV and UTV to extend peak time to 11pm, which would extend the window in which they could schedule regional content that must be shown in peak time? :

Given changes in social patterns of consumption and life, this proposal seems reasonable-