

3i) Do you agree with Ofcom's assessment that television continues to have an essential role in delivering the purposes of public service broadcasting?:

In the current phase of the University's relationship with the BBC the focus is on the creation of motivating learning journeys from TV to online and free print materials opening up opportunities for everyone to ?find out more? and join informal as well as formal learning communities. The Open University collaborates with the BBC to produce a range of high quality factual programmes such as ?Coast?, ?Child of Our Time? and ?James May?'s 20th Century?. In this way the BBC/OU collaboration can use television to support subject areas that may not otherwise be commissioned, for example, exploring disability in ?Nobody?'s Normal? (BBC 1 Daytime), ?Maths in Music of the Primes? (BBC 4) and ?African School, ?Indian School?, ?Chinese School? (BBC 4)

In the last year with the BBC the University has produced and co-produced over 90 hours for BBC TV channels. Audiences for BBC/OU programmes typically range from 2 million on BBC2 to 7 million on BBC1 and we are also credited with drawing in large audiences to some of our programmes on BBC4. During April 2008 we drew in the largest viewing figure for any programme on BBC4.

BBC/OU programmes almost always receive an Above Average ranking for Audience Appreciation often achieving 85+ which is classified as Excellent. Our annual average is AI figure for all programmes is 83 (2008).

Following its recent review of broadcasting strategy the University remains committed to working with BBC Television channels to reach and engage large audiences with high quality, informed educational and entertaining programming. The University, therefore, endorses Ofcom?'s conclusion that television should continue to have a role in delivering the purposes of public service broadcasting.

It is, however, also clear that online services are increasingly important and appropriate and will as is stated in paragraph 6.8 make possible support for personal learning needs and allow the following of individual interests. These can be produced at a lower cost than standard broadcast content and much of the University?'s thinking about the use of broadcast media for educational purposes has centred around the potential of the internet. It is also possible to use at low additional cost audio-visual assets that may have been originally produced for television.

3ii) Do you agree that UK-originated output is fundamental to the delivery of public service broadcasting purposes?:

The University is supportive of Ofcom?'s proposition that there should be substantial UK origination of programme content. Indeed, the University?'s work with the BBC and with independent production companies largely underpins this point since this has resulted in a number of UK-originated high quality programmes reaching large audiences.

At the same time, given geopolitical shifts, the turbulence of global economic and

political affairs, and in the light of the intrinsic global properties of, for example, environmental issues, the University also attaches value to programming which from an educational point of view encourages wider international awareness and will be seeking in its own broadcasting endeavours to ensure that international perspectives are achieved. The University will explore working in partnership with a range of international broadcasters where that can both help build capacity in other countries, in Africa and elsewhere, or share perspectives through, for example, schemes such as the EBU collection model which facilitates collaboration by PSBs around issues of common interest and importance.

4i) Do you agree with Ofcom's conclusions about the way that other digital channels and interactive media contribute towards the public purposes?:

The University strongly supports Ofcom's conclusions about the importance of digital media. The Open University is currently undertaking a number of initiatives designed to explore the significance of the gradual erosion of the distinction between traditional linear broadcasting and interactive broadband sites. The growth of the internet, aside from making possible far greater choice and interactivity, is blurring the boundaries between video, audio, and text and is providing new opportunities for the creation of educational content, the delivery of that content, and for the creation of learning communities around it. The University considers it a priority for public service broadcasting to fully engage with the implications of digital platforms and with the new opportunities for learning which they present.

A further aspect of online platforms is, as Ofcom notes in paragraph 4.38, the opportunity which they present for engaging with subject specific audiences. The Open University therefore sees its engagement with broadband platforms as one of the means by which it will extend its reach, widen participation, and achieve greater diversity of participation. The nature of these platforms and evaluation software allows interactions and engagement to be measured and this can give a much deeper understanding of the public value of the content.

In relation to education in particular, the significance on online interactive media is particularly marked in respect of younger audiences. It is increasingly recognised that educational provision will need to adapt to the fact of new generations of learners whose experience of communications media will have been largely rooted in their experience of the internet. Web 2.0 technologies are but the latest instance of internet technologies which will rapidly develop in sophistication and power and which cannot be ignored by educational providers. In such a world the connection between public service broadcasting and interactive media has to be acknowledged and planned for. It also opens up new possibilities for the sharing of the development of content with partners in ways which will ensure the best public value.

5i) Do you agree with Ofcom's assessment of the implications of different economic scenarios for the UK TV market for the future prospects for delivery of the public purposes?:

5iii) Do you agree with Ofcom's analysis of the costs and benefits of PSB status?:

6i) Do you agree with Ofcom's vision for public service content?:

The University supports the vision for public service content set out by Ofcom. There are several specific points to be made reflecting the Open University's broadcasting interests. First, the University will wish to continue to make significant contributions to high quality content which stimulates knowledge of the arts, sciences and other broad subject areas. It is central to the University's mission that it makes a contribution to the educational welfare of the community generally, and the deployment of the University's academic expertise for the purposes of achieving the stimulation of informal learning is an important objective. Second, there is a strong commitment to developing educational broadcasting (across a range of platforms, with a range of appropriate partners?) which further extends and deepens participation. There is, for the University, a strong connection between broadcasting and its widening participation and diversity aspirations, thus Ofcom's commitment to catering for different communities of interest is supported. Third, the University recognises that it will only be able to achieve its objectives by working with the plurality of broadcasting media, recognising the steadily increasing significance of online services.

6ii) How important are plurality and competition for quality in delivering the purposes of public service broadcasting, and in what areas?:

The University supports the importance which Ofcom attaches to the continuing central role of the BBC in public service broadcasting, and at the same time agrees that there are positive benefits to be derived from plurality. Our view is that this is particularly important in respect of education and learning which needs to reflect cultural diversity, UK-based and global learning interests, and the variety of channels and platforms which are used to access content and achieve interactivity. Only a plurality of provision is likely to be effective in an essentially pluralistic and rapidly changing cultural and technological context.

The University does, however, also agree with Ofcom that market solutions by themselves are unlikely to be effective in terms of both quality and reach. Our own broadcasting activities- with the BBC and with others- have always been driven by public service principles and a commitment to quality. Those principles and that commitment need to be fundamental drivers of the next generation of public service broadcasting provision and cannot be left to the market alone.

6iii) In maximising reach and impact of public service content in the future, what roles can different platforms and services play?:

It is essential in the University's view to recognise the importance of multiple platforms for the delivery of public service broadcasting. In order to reach younger audiences, in order to respond to diversity and cultural differentiation, and in order to deliver on the educational wellbeing of the community generally it is crucial that

broadcasting approaches reflect the technologies which people are using in a world in which conventional linear broadcasting remains significant but is declining in relative importance. An audience sensitive approach requires engagement with audiences? preferences for how they wish to access content, the times and the places of their choosing, and will need to anticipate the inevitability of the merging of broadcasting and broadband. It is the University?s view that the future of educational broadcasting within the public service framework will require these kinds of responses and the adaptability of providers to changing audience expectations and the associated technologies.

6iv) Do you agree that the existing model for delivering public service broadcasting will not be sufficient to meet changing needs in future?:

In the light of the increasing significance of multi-platform delivery and the need for a plurality of points of access to educational content, the University supports the notion that new ways for funding public service broadcasting will be required. This should not undermine the significant role which the BBC plays and which provides a benchmark for broadcasting standards, but the funding, and the policy and institutional frameworks will require serious attention and overhauling if public service broadcasting is to continue to deliver on the objectives set for it. This is especially but not only true of educational broadcasting.

7i) What are your views of the high-level options for funding public service broadcasting in future?:

The option of doing nothing to change the current arrangements is not acceptable for all the reasons set out above and in the Ofcom report. It is essential to foster plurality and to respond to changing audience needs and expectations.

From the standpoint of educational programming as a core component of public service broadcasting, the University would not support a reduction in the resources available to the BBC. A strong case is made in the report for ensuring that the BBC remains a central pillar of public broadcasting and steps should not be taken to weaken it, while recognising that the BBC will need to respond to new challenges and will need to continue to take the steps necessary for widening and deepening its impact. Simply reallocating resources from the BBC to other providers would not in itself increase the total amount of public service provision, and while plurality is a virtue unnecessary fragmentation is not. Given the importance of ensuring the full and effective continuation of the BBC?s role, as well as delivering on the principle of plurality, the University agrees with the Ofcom recommendation in paragraph 7.16 that ?new funds should be found to replace the current declining implicit subsidy?.

7ii) Are the proposed tests of effectiveness for future models for public service broadcasting the right ones?:

The tests set out in Figure 48 on p.96 of the report are useful and should be used to assess future models. They do, however, omit the test of quality. This may be implied but needs to be stated. A preoccupation with quality has been central to the University?s broadcasting relationship with the BBC, with educational programming

being informed by academic expertise, subject to rigorous scrutiny within both the BBC and the University. The reputation and future impact of public service broadcasting and educational broadcasting within it requires an uncompromising commitment to quality.

7iii) Of the four possible models for long term delivery of public service content, which, if any, do you consider the most appropriate and why? Are there any alternative models, or combination of models that could be more appropriate, and why?:

The University's view is that it is essential to adopt a model which enables the continuation of existing strengths to be combined with the realisation of the principle of plurality in ways which enable public service provision to be effectively delivered across all platforms. In the emerging context digital platforms are likely to be increasingly significant. Whatever model is adopted it needs, therefore, to ensure the principle of the continuation of the core role of the BBC, and the University will expect to work with the BBC to ensure that there is effective exploitation of all platforms. Given, however, the increasingly diverse nature of the UK and the pace of both social and technological change, future models will need to provide a secure foundation for a pluralistic approach to public service provision. The University welcomes further investigation of the strengths and weaknesses of the models articulated and suggests that further work is done to ensure that the models available for consideration effectively articulate the key principles needing to be adopted.

8i) What do you think is the appropriate public service role for Channel 4 in the short, medium and long term? What do you think of Channel 4's proposed vision?:

8ii) Which of the options set out for the commercial PSBs do you favour?:

9i) To what extent do you agree with Ofcom's assessment of the likely future long term issues as they apply to the nations, regions and localities of the UK?:

There are two main points which the University would wish to make. First, in line with what has been said in preceding answers it is essential that broadcasting should respond to the diversity of the UK- and its regional and local dimensions are key to this. The University will expect to work with the BBC in order to strengthen its regional broadcasting impact. At a point when the planning of educational provision is increasingly influenced by national, regional and local agendas and by the organisations and structures in place to drive social, economic and training development an educational response which is informed by regional and local considerations is inescapable. The University recognises this and will wish to see the funding and organisation of broadcasting established in ways which will facilitate the promotion of national, regional and local agendas and interests.

9ii) Which model(s) do you think will be most appropriate in each of the nations and in the English regions in the long term, and why?:

9iii) What are your views on short/medium-term issues referred to, including the out-of-London network production quotas?:

9iv) What are your initial views on the preliminary options set out relating to ITV plc's regional news proposal? (Please note that Ofcom will put forward firm options on these issues, and consult also on ITV plc's regional news proposal, in phase 2 of this Review.):

10i) Do you agree with our assessment of the possible short term options available relating to children's programming:

11i) Do you agree that new legislation will need to be in place by 2011 in order to ensure continued delivery of the public purposes in the medium and long term?:

Comments: