

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

Yes. It is clear that certainly for the short to medium term ie 2014 and quite possibly beyond that date that television will continue to play a key role in the delivery of PSB. Despite falling viewer figures for the 5 main psb channels they still account for nearly two thirds of viewing and despite the contribution of the internet and the non psb broadcasters they remain essential for the effective delivery of the purposes of psb.

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

If one accepts the core purposes of PSB as outlined in the review document (page 31) it is clear that UK originated output is an essential component of PSB provision. This is not to say that non-Uk programming cannot fulfill PSB purposes but it is hard to envisage the successful delivery of the 4 purposes without significant UK material, in particular output drawn from and representing the UK's nations and regions. It is interesting to note that the Ofcom research demonstrated that while audiences value nations and regions programming and seeing their nation or region represented at network level there is significant dissatisfaction with current provision in all areas of the UK except London, with Scotland and N. Ireland expressing the most concern. (page47)

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

The contribution of other digital channels and interactive services will become more important as take up of services increases and the diversification of the existing PSBs into new services should be applauded. BBC online and Iplayer and Channel 4's initiatives are significant and welcome. I would also single out the potential for PSB contribution made by the Channel M model based in Manchester. At present however these services are complementary to rather than substitutes for the delivery of PSB

**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?:**

**5ii) 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?:**

Yes, in particular the references to the importance of high levels of Uk content, diversity and the need to cater effectively for the devolved nations and the English regions.

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

Plurality and competition are essential elements.

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

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

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

Of the 4 options outlined the first, direct public funding, should be discounted on the basis of the potential risks to independence alone. The second option, the use of the licence fee, is likely to lead to a weakening of the BBC as our central PSB provider and is by no means certain to increase total PSB output. Whilst the suggestion that the licence fee could be increased faster than needed for BBC purposes is at first sight attractive it is unlikely to be achievable. This option should also be discounted. The third and fourth options represent the most effective ways forward and further research on option 4 would be most welcome.

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

yes

**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 most appropriate of the models is essentially model one. This is the only model which sustains a role for the current commercial PSBs and ensures the plurality of provision. It should however ensure that CH4 is adequately funded and it should recognise the need for mechanisms to support responsibilities such as programming for the nations and regions. It may be that this model could incorporate elements of model 3 such as the delivery of nations and regions programming through long term funding agreements with other providers.

**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?:**

Channel 4 should remain as a key cornerstone of PSB and should retain its distinctive mission of providing an innovative and diverse service. A vibrant Channel 4 is an

essential element in providing plurality and the Channel 4 vision for the future is to be welcomed. Of particular importance are the commitments to increase spend in the nations, to increase spend on UK originated content and to provide greater opportunities for new talent. The extension of its role into new digital media is welcome as an addition to plurality beyond linear tv channels. The channel needs a future funding model that will ensure independence and sustainability and enable CH4 to maintain sufficient scale to deliver real public impact. Privatisation should not be an option.

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

The Evolution model in which ITV retains its existing PSB status with the proviso that there is recognition of the challenge of sustaining its regional broadcasting model.

**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?:**

Given the concentration of broadcasting in London, eg, not one major channel is based outside of the capital, the issues facing the nations and regions are central to this review. I hesitate to quote from Broadcasting's past... but... " The greatest asset which ITV brought to national broadcasting was the distancing from London of a major part of the creative input into television... regional ITV brought an entirely new scrutiny to bear on British society. Public affairs and the institutions associated with them , mostly focused on Whitehall and central London can under review from a disturbingly unfamiliar direction. The effect on programme making was fundamental...it was the prescription for a broadcasting system that encouraged Britain to look at Britain rather than simply listen to London". David Plowright , the Chancellor's lecture , Salford University 1992. These remarks remain as relevant today. It is essential that the future PSB provision retains plurality of voice in the nations and regions and retains the capacity for creative input from these areas and for these areas to be represented on network screens. The ofcom research confirms that audiences value these matters and policy should reflect this.

**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?:**

In terms of the models the most appropriate is the model 1..Evolution. A plural PSB model , that retains a role for the commercial PSBs represents the best option for both the nations and regions.This could be supported by additional funding via regulatory or industry levy sources.In the absence of other providers the withdrawal of ITV regional news services would leave the BBC as the only regional TV news provider. There is also clearly a potential role for local TV within this framework along the lines of GMG's Channel M in Manchester.

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

Quotas remain an essential element in terms of achieving the four broader purposes of PSB as set out in the review document.

**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.):**

I am opposed to the the ITv proposals as they stand representing as they do an erosion of ITV's key regional role. I do however acknowledge that ITV will face a funding gap and that there is a serious challenge in this area and that additional measures to provide support will need to be explored.

**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:**