

Title:

Mr

Forename:

Paul

Surname:

Keegans

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? :

No. I strongly believe there should be far more original programming, out of London, produced and broadcast in the nations of Scotland and Northern Ireland. This is because of the huge amount of programming from England and, in particular, the south east, which does not reflect the people of the nations. As there is now a vast amount of channels available which caters solely for the south east, Channel 3 should boost its commitment to more local programming.

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? :

I agree with more regional news arrangements for England, which takes Channel 3 back to its roots. I do not agree with less broadcast hours to accommodate this, however. The costs should be met by ITV.

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. UTV should be committing to boost its own output and sell this to advertisers. UTV could also produce more programming for ITV and beyond in order to fund programming for its own territory.

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? :

No. As a viewer of STV, I do not feel its programming relates to me. Far too much of its programming is from ITV in London and far too much of it is produced in the south east. For a company to call itself STV - Scottish Television, it is insulting. STV needs to invest heavily in more content produced in Scotland, for Scotland. This should cover as many genres as possible, not just news and current affairs. It should do this for a number of reasons, but primarily it would be to boost the local economy by bringing more jobs in the creative industry, and to bring programming that relates to the lives of people in Scotland. With the exception of local news and current affairs, STV is failing this duty. Even the recent spate of productions for ITV have all been produced south of the border.

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? :

No. I believe the devolved nations should each have a diverse range of programming that relates to them. I do not believe 5 hours and 30 minutes a week is long enough to achieve this.

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. As before, I believe each territory, or nation, should have programming that relates to them. 3 hours 20 minutes is nowhere near enough to achieve this.

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? :

I strongly believe the Channel 3 network should end and that each nation of the UK should have its own licence to broadcast on Channel 3. Each would be a sovereign broadcaster in its own territory, and each would produce and buy programming rights for their viewers. There would be no network to opt in and out of and each licence holder would create its own schedule daily based on the devolved nation they broadcast to. I believe this has become more necessary due to the change in ITV's regional structure, becoming one single brand in England and Wales. This has resulted in STV opting out of the network far less than it did 10 or so years ago and less relevant programming. It's surprising it has gone this way considering Scotland has its own parliament and is becoming different in many ways to the laws and politics of England. Above all, it's harder now to give credit to STV for viewing figures and profits when they are simply simulcasting programming from ITV in London. There is very little Scottish about that. The network only seems to benefit the 3 licence holders and their shareholders, not the viewers of the nations they represent.

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

I would prefer Border to become a part of STV as it is the best of a bad bunch. The provision of content for Scotland is poor from both broadcasters, but STV is better than ITV for Scottish news.

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? :

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? :

I am against this. This proposal is, once again, working around the ITV 1 schedule in order to fit its own programming in and would mean Scottish programming would be showed at a time when most people are going to bed. STV should be creating its own schedule for Scotland and broadcasting a varied mix of Scottish and UK programming, resulting in them being able to work within the existing framework.