

**Title:**

Dr

**Forename:**

Aileen

**Surname:**

McLeod

**Representing:**

Self

**Organisation (if applicable):**

Member of the Scottish Parliament

**What additional details do you want to keep confidential? :**

None.

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

No parts need to be kept confidential.

**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? :**

**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? :**

**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? :**

**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? :**

**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? :**

**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? :**

**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? :**

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

My preference is for an all Scotland license. Scotland is a country with its own Parliament, legal system and institutions such as health, education and environmental agencies. The people of the Borders and Dumfries and Galloway are part of the country of Scotland and have played – and continue to play – an important part of shaping that country. The lack of an all Scotland license deprives people in the South of Scotland region of a plurality of national programming about their country. Party political broadcasts are either not broadcast or broadcast at odd times. Leaders' debates for the Scottish Parliament elections in 2011 were broadcast in prime-time of STV and late at night on ITV Border.

As we approach the referendum on Scottish independence in 2014, it is vitally important for democracy that viewers in the south of Scotland can access the same coverage of the issues as people in every other part of Scotland.

I believe that Ofcom is wrong to restrict the options to just two - those defined by ITV. However if forced to choose, Option 2 is the more attractive. In my view Option 1 is totally inadequate to meet the needs of viewers in the south of Scotland. Whilst it is clear that viewers in this region are not currently satisfied with the TV offering in the Border region, a survey conducted by Christine Grahame MSP before the merger of ITV Borders and ITV Tyne Tees showed that **70%** were not satisfied with the TV offering then either. Concerns over Border TV's coverage of Scottish affairs predates the merger and has simply been exacerbated by it.

In my view Option 1 does little more than return to the situation that persisted before the merger of Border and Tyne Tees, in effect reinstating the old “Lookaround” programme, which failed to satisfy Scottish viewers in the past. Ms Graham’s research should be borne in mind when analysing the more recent Ofcom research that suggests viewers want a return to the situation they had in the past. While that would undoubtedly represent an improvement on the current situation, it was not in fact felt to be particularly satisfactory.

Recent Ofcom research did show a high demand for local programming and a high percentage of people in the Border area watching ITV’s regional news offering. However, this is likely to be because the area is comparatively poorly served by the BBC in terms of local TV news coverage. Reporting Scotland generally has very little coverage of the South of Scotland.

It should be noted that the same research showed that viewers in the South of Scotland were significantly less satisfied than those further north with the coverage of Scottish news, with only **49%** responding positively compared to **64%** and **74%** in central and northern Scotland respectively.

Even though the BBC provides Scottish news, albeit with very limited local content, viewers are still being deprived of a plurality of news sources. The national UK news is provided by BBC, ITN and SKY on a variety of platforms. There is choice in national UK news. Scottish national TV news is only provided for viewers in the South of Scotland by the BBC, which is in my view an unhealthy situation.

I think Option 2, which increases local content while allowing ITV to purchase additional programmes such as Scotland Tonight from STV, would go some way to alleviating these concerns. However an agreement would have to be reached with STV to provide a local news opt out for that part of Scotland Tonight that brings the news from different corners of Scotland. People in the Border and Dumfries and Galloway region are rightly anxious to ensure that they are not left with news from the central belt.

Whilst ITV suggests that this option would be disproportionately expensive, Ofcom’s impact assessment suggests that Option 2 could be equivalent or cheaper than Option 1 and it would only be splitting the Border digital terrestrial transmission between English and Scottish portions that would increase the material cost; however, I strongly believe that this cost is necessary, both to recognise the distinctiveness of Scotland as a nation and to meet the particular requirements of our small rural communities.

**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. It is important, for both the Scottish and the English portions of the licence area, that ITV ensure that audiences are shown content that is of local and national relevance to them as far as possible.

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

As Ofcom have chosen not to pursue the option of auctioning a new all-Scotland licence I believe that Option 2 is a satisfactory compromise.

**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?**

I believe Border should provide the same amount of local and Scottish programming as STV.

**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 believe 11pm is too late for peak time.