

Dear OFCOM,

I have decided to focus my response on Consultation Question Seven: What are your views on the opportunities for new providers of PSM?

There exists a fantastic opportunity to ensure current and future citizens for the UK and elsewhere get to consume valuable, original content by creating a new, contestable content production and distribution fund.

This could create afresh an equitable cultural and economic powerhouse for the new creative generation, rather like the founding of Channel 4 in 1982.

We know young audiences are spending increasingly more time consuming content via on demand and via social apps.

In order to continue to reach more young people, we must go to these audiences in their preferred environment. We must offer them content which is valuable and relevant. And we must make sure this content is immediately available and prominent.

In order to do this, we must accept that a new, side by side approach to PSM is required. We must create a second production and commercial model for PSM which is content specific, audience focussed and platform agnostic.

Our PSB's do a fantastic job of reaching the parts of our population that highly value their services, and are happy to consume them in the existing formats, e.g. linear scheduled television and catch up services. This should continue, and funding levels shouldn't be further diluted. However, for those who don't choose to engage with PSB content currently, and with that number rising, we must take urgent, positive action.

Government should create the UK Original Video Fund.

This fund should offer a generational economic and cultural opportunity to viewers, producers, platforms and government , kickstarting a post-Covid cultural recovery.

UKOVF would commission, finance, help distribute and assess the outcomes of a new wave of original British video content.

It would:

- Be open to pitches from across the UK's amazing community of video creators, producers and distributors.
- Set clear guidelines for scope and reach of content
- Ensure all content is of high quality
- Support the original video community through education and assistance
- Agree and assist with distribution plans for the content
- Manage funding allocation and ROI
- Measure outcomes to ensure success
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In order to do this, the following model could be adopted:

- Content is commissioned from producer

- Original Video series is produced with commissioner oversight
- Series is distributed across mutually agreed sole or multiple partner platforms in the UK
- International rights income is retained and split between funding partners, producers and platforms
- Data is assessed to measure against success metrics, and fed back in to commissioners to ensure positive evolution of the fund

UKOVF can be funded in multiple ways, but a sensible approach might be to impose a sales tax (say 5-7.5%) on the video advertising sales income of free-to-air video providers operating in the UK over a certain turnover size (say £250m+ p.a.). Also, a portion of international rights income could be re-invested into the fund, making it self funding after 5-7 years.

This will create a commercial flywheel effect, rather like existing terms of trade model for UK linear broadcast producers.

To ensure effective distribution of UKOVF video, resulting content may be required by law to be prominently suggested to viewers in the UK by partner platforms.

To ensure buy-in from the platforms, UKOVF may pay for some or all content to be prominently carried by platforms, creating a mutually beneficial way for culturally important video to reach audiences in a sustainable manner.

Prominence would help burst audience echo chambers, and also offer platforms the opportunity to carry reputationally positive work on their services, for which they will likely increase their public image.

If there is a focus on content types, we should match the types of genre to those platforms who best reach the audiences. This can either be done prescriptively by limiting the UKOVF scope to specific content genres, e.g. documentary, or by partnering via commissioning on a bespoke, case-by-case basis.

The main genres that platform-agnostic content would work for are likely to be specialist factual, documentary, young music and comedy, religion and ethics, sport, and factual entertainment. Younger audiences are crying out for the kind of quality content that older audiences have come to take for granted in the UK.

Broadcasters are rightly focussed on super-serving their lucrative, habituated legacy audiences. It is an inefficient waste of money to force them to chase viewers who are so unlikely to come to them.

It is time the UK decided to deliver for the next generation with a bold new venture, like we have done in the past with the BFI film fund, the creation of Channel 4, the Arts council funding and the BBC.

We have amazing young diverse production talent, but for British producers, the Indy model is effectively closed to new entrants.

It's vital for our country that young people are part of the public discourse.

But if we don't reach them, they will feel increasingly disenfranchised.

We know what they watch, where they watch it and how they want it, and therefore we must build a new system for our precious emerging talent to thrive.