

Title:

Mr

Forename:

Paul

Surname:

Wheelhouse Msp

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:

I will confine my comments and response to the consultation to those questions directly affecting my constituents in the South of Scotland.

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?:

My preference, based upon views expressed to me by constituents and influenced by my own experience as a viewer living in Scottish Borders would be for the current ITV Border local coverage to feed into an all-Scotland service providing distinctive Scottish programming in

areas such as politics, sport, entertainment and culture. International / national news would then be picked up on the same basis as the current STV service.

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? :

No comment

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 Comment

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? :

Regrettably, the option for STV coverage with a South of Scotland service, is not proposed for Scottish Borders and Dumfries and Galloway. However it does affect the remainder of the region I represent, but as I have not sought views from my constituents on this point I will not take a position on the issue posed under Question 4.

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 comment

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 comment

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? :

Should be a single licence for Scotland for reasons set out in Q8.

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

Of the only two options presented by Ofcom (see my response under Question 10 on the limitation of the consultation), Option 1 is my preference for the Border region and I welcome this proposed improvement in local, relevant output. I support this in preference to Option 2 because primarily it will best increase local coverage for the South of Scotland (which for the purposes of this submission I will define as being Scottish Borders, Dumfries & Galloway and parts of South Ayrshire rather than the parliamentary region) in terms of news and current affairs.

Option 1, in my view, allows for local stories to be covered in greater detail than at present and gives the Scottish Borders the chance to hear about their own communities. However, I equally recognise that Option 2 might allow greater coverage of issues at a pan-Scotland level, if there is a possibility of a separate signal for Scottish viewers, to ensure the relevance of the output is optimised.

Having had discussions with representatives of ITV it is clear that increasing the output by ITV Border to cover the Scottish part of the region under option 1, more local correspondents would be based in the region, and therefore far better allowing for a local feel to the news output and satisfying the anecdotal preference for localised news.

Under the guidance of, say, a Scottish Borders based political editor I would foresee greater focus on local news as well as a South of Scotland emphasis on Scottish national stories, which would be a very welcome development from the current situation of receiving a disproportionate share of our news output from a North of England (and in particular Tyneside) perspective, which is irrelevant and, in many cases actually misinforming residents of South of Scotland as to public policy as it affects them - I regularly meet voters who are confused as to their rights to services because news coverage is not always clear that changes in the NHS in England, for example, do not impact on residents of Scottish Borders, because health is devolved.

The main strength of Option 1 is in terms of providing increased local coverage rather than national coverage, with the potential for looking in depth at how national issues affect local communities in the ITV Border region.

As stated previously, in the run up to the referendum on Scottish independence in 2014, and beyond it, it is even more important that people in the Scottish Borders are able to receive news and current affairs updates that relate directly to them and their experience.

Otherwise there is a risk that people who have a vote on the future of their own country will not feel as fully informed as their counterparts in the rest of Scotland to exercise their right to vote (for either to choose Independence or to stay within the UK). Providing an increase in local coverage for residents in the region is the responsible way to proceed, but I reiterate that my preference would be for viewers in the South of Scotland to be able to access key referendum debates and political output on a similar basis to our counterparts across Scotland.

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? :

Providing separate transmission for the Scottish and English parts of the region would ultimately be essential should option 2 be adopted, as viewers are more likely to watch programmes relating directly to their locality and of relevance to them. Option 2 without this would be unacceptable. This would also reduce the potential for people to become confused as to policy that actually applies in the area in which they reside (for residents on either side of the Border). However, if the separate signal cannot be delivered, then there would need to be a clear distinction made by ITV Border between local, Scottish and English current affairs /policies when broadcasting national stories, as well as provision for accommodating genuinely local news.

Splitting the transmission would most likely be the more appropriate way to achieve an optimal outcome for viewers on both sides of the Border, however, the cost implications for this are as yet unknown. This is despite my direct request to ITV representatives at a meeting with MSPs in the Scottish Parliament over a year ago to provide information on the engineering cost to separate the transmission signal. These costs would also be relevant to establishing how to accommodate the region as part of an expanded all Scotland licence (the missing option in this consultation) and information of the necessary investment would greatly aid the debate on the future of broadcasting to put this right. It is a great regret that this functionality and flexibility was lost to the region during the digital switchover.

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

My strong preference, based upon views expressed to me by constituents and influenced by my own experience as a viewer living in Scottish Borders would be for the current ITV Border local coverage to feed into an all-Scotland service providing distinctive Scottish programming in areas such as politics, sport, entertainment and culture. However, this option has not been presented by Ofcom, which I very much regret, as it would have been an opportunity to seek views on this as an alternative alongside the to "steady as you go" options that are presented in the consultation. The population of Scotland will be making the most important decision it has been asked to make in the referendum on Independence which takes place on 18th September 2014 - and this is every bit as relevant to the people I represent in the South of Scotland as it is to those further north, and yet we are excluded from viewing debates on the same basis as our friends and family elsewhere in Scotland. In the Scottish Parliament election, there was outrage at the inability of the ITV Border team to be able to broadcast key leaders debates at the same time as the rest of Scotland (we were subjected to a England friendly football match instead, to compound the point) and arguments made to me by Lucy West, on behalf of ITV, that a similar audience share was achieved as was the case for the earlier showing across the rest of Scotland did not stand up to scrutiny as the number of viewers watching television in the slot straddling midnight would be far smaller than at peak viewing time - i.e. 7% of peak viewing constitutes a far higher reach than 7% at midnight.

In this referendum it is vital that South of Scotland is able to access and engage in the debate on the same terms as the rest of the country with the bonus that by participating in the same debates and current affairs coverage, the South's own unique perspective and issues are then best heard in that debate too. Beyond this, it is crucial to the future of the region that our story is articulated to a wider Scottish audience and policy makers and opinion formers and potential investors across Scotland, so as to ensure that the region is not isolated from opportunities to set the agenda and benefit from exposure to a Scottish audience. At present,

our distinctive culture and perspective is largely forgotten in terms of commercial TV coverage in Scotland. If this is not possible, Ofcom should make it easier for viewers to select STV as an alternative via satellite - at present this is cumbersome and leaves viewers unable to take advantage of being able to view and record programmes on STV via their service provider. Removing the apparent bar on the choice of STV/ITV1 service to use would be far fairer.

Allowing Scottish Borders residents to access coverage of club rugby coverage broadcast by STV is an issue I have addressed to ITV executives as being a key problem with the current TV packages available in South of Scotland. I am delighted, following Hawick' promotion, next season will see 3 Borders teams in the Premiership in Scotland, i.e. the top flight of club rugby in Scotland. Unfairly, Scottish Borders residents will be unable to view the coverage. A move to a single Scotland licence would overcome this and in so doing would address a huge concern in the region and allow local viewers to follow their local heroes in action. Movement to Option 1 would, however, offer greater scope for local sports coverage in news output and therefore this would be a positive move, if not moving as far as I would wish.

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? :

While in an ideal world it would be nice to have a production centre in the Scottish Borders or Dumfries and Galloway, the cost implications in relation to the population and potential viewer reach perhaps renders this impractical for ITV. So, while it may not be my ideal outcome, I understand the reason for ITV planning retention of its production hub in Gateshead, but it is crucial the local news gathering is able to increase as planned. Therefore, I agree, in the absence of my preference for a single all Scotland commercial licence with enhanced South of Scotland content being accommodated, that the Border licence should be amended to allow option 1 to be a sustainable way of working.

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?:

There would be merit in extending peak time to 11pm in terms of advertising revenue and the potential for an increase in original content to be screened during a newly extended peak time. However, it is unclear what viewing intentions would be should peak time be extended and evidence in the consultation suggests peak time viewing on channel 3 ends at 10.30pm, albeit this of course is a somewhat unhelpful analysis in that it is based on current output and not those viewing options that would be available under scheduling that would accompany an extended peak viewing slot.

If peak time is extended there is a possibility that viewing figures would remain higher until 11pm, because of changes in output, however that would most likely depend on content and, as stated above, an unknown quantity without further research. In summary, more research should be done to explore the potential of extending peak time, with this seeking views on proposed changes to output for the slot, and if it provides a substantial benefit to viewers of both public service broadcasters and ITV, the option to extend should be made available.