

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What additional details do you want to keep confidential? :

Keep name confidential

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:

My preference is for an all Scotland licence. 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 south of Scotland is the land of Robert Burns, Sir Walter Scott and Hugh MacDiarmid. Rugby Sevens were invented here, the Scottish sport of curling is huge and there are unique traditions such as common ridings and haaf netting. Not having an all Scotland licence deprives people in the region of a plurality of national programming about their country. It also means that public information campaigns - such as the recent Scottish government road safety campaign fronted by south of Scotland racing driver David Coulthard was not shown on his own home turf. Party political broadcasts are often not shown or streamed at odd times. For example UKIP broadcasts go out in the south of Scotland despite that party having no electoral presence here. But the SNP, Scotland's party of government, struggles to get coverage. It is worth noting that the SNP won the list vote in the south of Scotland region so political trends here are similar to the rest of Scotland. As we approach the referendum, 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 by far the more attractive option. Option one 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.

Option one does little more than return to the situation that persisted before the merger of Border and Tyne Tees. It does little more than reinstate the old "Lookaround", which failed to satisfy Scottish viewers. 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 it would be an improvement, it did not in fact satisfy them at the time. 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 poorly served by the BBC. Reporting Scotland has very little coverage of the south and in some parts of the region viewers receive BBC Look North, which has no local content.

Ofcom research has shown there is a great demand for local news and option 2 would provide more local content that is relevant to those viewers in the Border region. However, 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.

We should remember that even if viewers believe the BBC provides Scottish news, they 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 therefore. Scottish national TV news is only provided for Border area viewers by the BBC - if at all - and that is unhealthy. An example of the importance of plurality is offered by the recent Jimmy Savile scandal which was exposed by ITV after the BBC refused to broadcast an expose. Plurality is essential to our "right to know".

Scottish news also impacts on local news. With health, education and justice all controlled by the Scottish parliament, issues affecting local policing/crime, schools and hospitals are all affected by decisions made in Holyrood. I have been approached by many constituents who have raised concerns that they are missing out on many STV programmes, such as STV Rugby, the highlights programme that broadcasts on a Sunday evening and most commonly, Scotland Tonight. In addition there are one off programmes, such as the forthcoming STV documentary on the Scottish Political Question, which viewers in the border area currently do not see. There are cultural programmes such as Scotland's Greatest Album which had a high level of viewer interaction - but not in the region. Most recently young people from the region who received a Young Scot Award were unable to watch themselves receive the honour on television. While some programmes are streamed online, the poor broadband coverage means many still cannot see it.

I think option 2, which increases local content 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 local news opt out for that part of Scotland Tonight that brings the news from different corners of Scotland. People in the Borders and Dumfries and Galloway region are rightly anxious to ensure that they are not left with news from the central belt.

Whilst ITV seem to suggest 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. I would urge ITV to enter into talks with STV and the Scottish government to examine what needs to be done regarding the costs of infrastructure improvements.

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? :

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. The fact that this would increase cost is simply not a valid excuse.

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 tolerable compromise for the mean time.

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 in the Scottish part of the region

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.