

Ken Macintosh MSP Working for East Renfrewshire

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Mr Ed Richards,
Chief Executive,
Ofcom
Riverside House,
2A Southwark Bridge Road,
London SE1 9HA.

4th Dec 2008

Dear Mr Richards,

I wish to make the following contribution in response to Ofcom's review of public service broadcasting. I will not comment on every area in your review, primarily because I am content for the most part with the ongoing role of the BBC funded by the licence fee and indeed with discussions around the future of Channels Four and Five. I am however, very anxious about maintaining an independent and competitive commercial public service broadcaster in Scotland and my remarks are focused primarily on this issue.

I accept that STV is currently in a very difficult position. The switch to digital and the re-alignment of advertising revenue are just some of the factors which have brought into question the company's ability to fund its public service commitment. The extra and I believe un-called for worry is the attitude of ITV bidding effectively in competition with STV for a single national licence for the whole of the UK. I am not sure a national ITV is in the interests of Scottish viewers, in fact I doubt it is in the interests of UK viewers. I suspect that if approved, we might end up with a commercial broadcaster with little to distinguish it from the myriad other commercial companies now available on the digital spectrum, serving up cheap American programming to complement some British made but mass market productions with the fig leaf of a public service obligation ensuring it retains its listing on the front page.

I worry that we would lose any commitment to Scottish or local news, to Scottish sport or weather and dare I say it, to Scottish politics. In fact, I doubt we would be left with any Scottish-based ITV programme production with obvious and very serious implications for regional and national diversity, not to mention the impact on the creative economy in Scotland.

I understand that STV are pitching for some form of subsidy in order to maintain its news and other PSB programming. I am not sure I accept that these programmes should be seen entirely as loss making as they are an integral part of building brand loyalty to the station, but if support is needed I would certainly argue it should not come from the licence fee. We need a commercial public service competitor to the BBC but not one which undermines the financial standing of that unique organisation.

I am more sympathetic to a couple of other bids from STV, most notably for recognition and status as an independent producer not just as a broadcaster and for the company to be allowed to take a central role in any future new Scottish digital channel.

I am aware that the cumulative impact of commercial pressures, technological changes and developing viewing and reading habits are radically altering our media landscape. If left exposed to those forces and potentially unfettered by the PSB obligation, I am not confident commercial broadcasters will meet the needs of Scottish viewers individually or as a society. I hope any decisions or recommendations take into account the public interest of viewers and listeners in Scotland.

Yours sincerely,

Ken Macintosh MSP