

3i) Do you agree with Ofcom's assessment that television continues to have an essential role in delivering the purposes of public service broadcasting?:

Yes. Television will remain central to a public service remit for some time, as virtually all households have access to television. If internet access via television becomes a simple reality [so even the least technically savvy can use it], then this disruptive technology will extend television as the dominant way for citizens to receive public service broadcasting.

We do recognise, however, the growing importance of a public service remit for new digital media, both mobile and web based. Television is already less important to younger people and this trend will accelerate over the coming years.

The way forward is balancing the gradual shift of power in PSB, from television to new digital media formats

3ii) Do you agree that UK-originated output is fundamental to the delivery of public service broadcasting purposes?:

Yes. UK-originated output is fundamental to our cultural identity and the delivery of public service broadcasting. We will see a negative impact on our screens as commercial pressures continue to reduce original programming across many genres and especially across regional television output.

The PSB funding models of the future need to counteract this negative trend, with a real focus on quality regained through higher budgets.

Programming should reflect the diverse nature of the population and the differing cultural sensitivities. The West Midlands region represents 9% of the country's citizens and yet less than 2% of production is originated here, this is a significant imbalance we would like to see addressed.

4i) Do you agree with Ofcom's conclusions about the way that other digital channels and interactive media contribute towards the public purposes?:

Yes broadly. We recognise that to improve upon the blend of public service content we currently receive from BBC, ITV, Channel 4 and SC4 that new funding models need to be explored.

More emphasis could be placed on the development of new digital media platforms to liberate the niche requirements of many sub-groups in society. By illustration, take the effect of 'the long tail' in music publishing - huge new markets and opportunities were discovered when people had access to 10,000 songs at once, rather than the 100 that were previously 'selected' for them. The PSB should liberate the long-tail within digital media provision, reaching into new areas and supporting previously hidden needs. The new digital age is all about giving people power, sometimes those people need help to access and have available to them the highest quality ideas and provision that can be reasonably achieved.

There is a wide range of public service content being delivered on-line. This content tends to be of a lower quality than the best of the content created by entertainment suppliers, so there is much that could be done to bring the standards of public value content up to what we expect from offerings from, for example, Channel 4 On-line.

5i) Do you agree with Ofcom's assessment of the implications of different economic scenarios for the UK TV market for the future prospects for delivery of the public purposes?:

Yes broadly. We agree that commercial channels will be under increasing pressure, leading to a reduction in original programming and even less regional production in the future.

We agree that the evolution of the way audiences consume media will be an important factor in future funding models.

We favour market intervention in the area of digital media innovation, ensuring that the UK remains a world leader in broadcast media. The UK is a world leader in television NOW because of the funding from public service broadcasting. To get the crown as world leader on new and emerging types of digital media, the PSB must fund new digital media content, technology and distribution in the future.

5ii) Do you agree with Ofcom's analysis of the costs and benefits of PSB status?:

Yes. We agree that the case for continued public funding and a PSB remit is well made. It is wanted by citizens and funding should be expanded to embrace new forms of digital media.

6i) Do you agree with Ofcom's vision for public service content?:

We agree with Ofcom's overall vision although feel that the market for on-line content of public value should have new Ofcom funding to support it. The UK will not be able to maintain the high creative standards of on-line content we have come to expect, from sites such as Channel 4 on-line, without resources being made available to create content to these high standards.

The UK has the opportunity to take a world lead in increasing the quality of public value content ? we should take it!

6ii) How important are plurality and competition for quality in delivering the purposes of public service broadcasting, and in what areas?:

Plurality of supply is crucial to maintain a diverse voice and cultural representation across the nation. This includes the maintenance of vibrant and sustainable production centres in the regions.

Whilst the principle of not replicating the supply of certain genres of programmes is

noted [e.g., children's and religion] we maintain that it would be wise to build-in scope to have plurality of production even in these areas, where genuine regional production would enable us to offer a richer and more thorough range of content for these genres.

The BBC, excellent as it is, cannot respond as fast and nimbly to innovation as emerging small production companies often can. This is why we support commissioner models of production such as channel 4's, where they do not have their own staff, instead they contract many teams from many different suppliers to deliver a rich 'joined-up' service.

6iii) In maximising reach and impact of public service content in the future, what roles can different platforms and services play?:

There is a clear trend away from television being the universal way to reach citizens in the future. The UK should maintain its global reputation as a leader in media broadcasting by the PSB investing in new innovative approaches to digital media content, production technologies, content types and business models.

We want the UK to become the global leader in digital media in the future, just as it is the global leader in television today.

6iv) Do you agree that the existing model for delivering public service broadcasting will not be sufficient to meet changing needs in future?:

Current funding models will not be adequate for funding public service broadcasting in the future. The reducing funding available to Channel 4 in the current system is a prime example of the way that 'what worked a few years ago' is just not fit-for-purpose now.

We consider that the funding dilemma facing Channel 4 is the most crucial short-term funding issue to be addressed. Many regional businesses benefit from the Channel 4 commissioner model, and so we would want to see commissioner broadcast models of funding being used more in the future to spread production to more companies and freelancers.

AWM has recently invested £5m in Digital Media Innovation [non television], this will focus on supporting Channel 4's 4IP Fund, scheduled to launch in September 2008.

Ofcom should look at new models of funding, such as regional funding through projects such as The Digital Media Fund. Whilst working hand-in-hand with channel 4's 4IP fund, this fund retains the scope to invest in a wide range of organisations and bring in other private and public money to create new partnerships. We believe innovation is best served by creating very flexible funding streams which enable the best ideas to find their way to the top and get funded, not matter where they come from.

We believe there is a strong argument to look again at 'digital commissioning hubs'

outside of London and outside of major production centres such as Manchester too. 4IP is leading the way in how hubs like this could work in the future.

7i) What are your views of the high-level options for funding public service broadcasting in future?:

We favour the model of PSB content being free at the point of use. Commercial broadcasters should contribute a small percentage of turnover to subsidising psb content, just as in the 'golden age' of ITV, when the levy on profits went to fund Channel 4.

New funding models should be explored, receiving income against the scarce resource of broadcast bandwidth. Perhaps micro-payments could be explored.

In digital media, funds like Channel 4's 4IP should be monitored closely to look at what types of commercial Intellectual property can flow from individual projects.

The quality of the BBC has been successfully maintained by the license fee over many years. We support the BBC receiving the lions share of funding as at present but would like to see new models of collecting the fee explored.

7ii) Are the proposed tests of effectiveness for future models for public service broadcasting the right ones?:

We support your three key tests for delivering public service broadcasting. We also strongly support any tests that can make broadcast production less London and Manchester centric, bringing real production to the other regions.

Tests should not create a situation where innovation is constrained. Innovation will be enabled better by having more organisations able to reach the market with their content.

7iii) Of the four possible models for long term delivery of public service content, which, if any, do you consider the most appropriate and why? Are there any alternative models, or combination of models that could be more appropriate, and why?:

We support model 3, BBC/C4 plus limited competitive funding. We would like to see Ofcom receive new funding to support a wide range of emerging digital media types. We believe that Channel 4 has demonstrated the ability to create diverse and inventive programming giving a real choice against BBC programming.

But there will be specialist content requirements that may need third party organisations to be able to be commissioned to create content too, beyond BBC and Channel 4 funding. We would hope that option 3 will therefore genuinely have the scope with perhaps 5% of their monies, to decide on a case by case basis on where that should be spent.

8i) What do you think is the appropriate public service role for Channel 4 in the short, medium and long term? What do you think of Channel 4's proposed vision?:

We support Channel 4's proposed vision for the future. We do not think they should have their scope restricted, plurality of programming with the BBC should be maintained.

We would like to see their funding extended to explore new digital media content types. Consideration should be given by Ofcom of Channel 4 being funded to run regional digital media hubs, these could be based on models emerging after the two year pilot period for the 4IP Fund and our Digital Media innovation Fund.

8ii) Which of the options set out for the commercial PSBs do you favour?:

9i) To what extent do you agree with Ofcom's assessment of the likely future long term issues as they apply to the nations, regions and localities of the UK?:

We support Ofcom's assessment of the very considerable issue in the nations and regions. The West Midlands has been especially hard hit. With BBC Pebble Mill closed, BBC production in the region thinned out and at the time of writing considerable threats on remaining production. What is left is often of a lower cost and quality than it could be, meaning that looking at regional production hours alone can be deceptive.

Already ITV regional production is minimal. Perhaps contracts for ITV in the future could be written in a way that incentivises them to increase regional production.

Channel 4 could have an increased public service requirement for funding and commissioning production in the region. They could take on an agenda for regional news, previously done by ITV.

It is important that the aggregate effect of funding support for the region can maintain all production skills in the region, eg., drama production. What is here should be at sufficient level to fully sustain and attract broadcast workers to want to live and work in the region.

9% of the license fee payers in the country live here, it is not unreasonable that a fair proportion of the money they pay is spent in the region on a diverse and high quality range of programme production and content.

9ii) Which model(s) do you think will be most appropriate in each of the nations and in the English regions in the long term, and why?:

Option 3 with one proviso. As certain regional centres become 'super-hubs' outside London, e.g., Media City in Manchester, then intervention is required by the PSB

remit to ensure that a sustainable base of television, radio and emerging digital media production can be focussed in other regions too, such the West Midlands.

There is scope for a regional digital media commissioning hub, embracing a range of media types, working either through Channel 4 or alongside it, to ensure a plurality of content types and production in the regions.

9iii) What are your views on short/medium-term issues referred to, including the out-of-London network production quotas?:

We feel that 'outside London' should include 'outside major production centres' too. If this is not done then a huge production base in Manchester will satisfy Ofcom's regional production quotas and areas such as the West Midlands will be left with very little. As 9% of the license payers and viewers live and watch TV within our region, it is incumbent upon Ofcom to ensure that they get a fair and balanced provision, taking into account regional sensibilities and economic factors.

9iv) What are your initial views on the preliminary options set out relating to ITV plc's regional news proposal? (Please note that Ofcom will put forward firm options on these issues, and consult also on ITV plc's regional news proposal, in phase 2 of this Review.):

10i) Do you agree with our assessment of the possible short term options available relating to children's programming:

Yes. Except there may be some instances where a plurality of regional production would benefit original children's programming.

11i) Do you agree that new legislation will need to be in place by 2011 in order to ensure continued delivery of the public purposes in the medium and long term?:

Legislation needs to be in place by 2011. The UK cannot afford to have too much time slippage on implementing a future strategy for broadcasting.

Comments:

The regional government and RDA's have a stake in how the funding of future content is structured. They should be specifically consulted by Ofcom as to their preferred future role in the funding debate.