

Having read the BBC submission, it is evident that the BBC's application to vary its operating licence is worthy of support and should be approved.

However, I wish to take this opportunity to draw Ofcom's attention to the broader PSB context in relation to Children's programming and other genres.

After Ofcom's welcome restrictions on advertising of HFSS foods, ITV retreated from making programmes for children. Ofcom accepted this change.

The consequences of Ofcom not continuing to require that PSBs other than the BBC make children programming then resulted in the need to establish the Young Audiences Content Fund which is administered by the British Film Institute and this is the crucial point, funded by top-slicing the BBC's income.

Even if this money comes from budget unspent in relation to digital switchover, it was still part of the settlement agreed between the BBC and the then government.

So Ofcom lets other PSBs dilute their PSB offerings which results in the diversion of BBC income which could equally well have supported the success of the BBC's productions eg RTS award to CBeebies as Channel of the year

That is called being penalised for success and also top slices money for content by having to pay for the process of bids and awards etc

Having said that, my judgement is that the 5% of the fund designated for eg. Gaelic/Welsh is more than welcome.

A similar story can be told in relation to ITV giving up on non-news regional programming etc and the resultant pressure on the BBC to make up the gaps and improve performance in Nations and Regions Programming - which they are doing. eg the excellent BBC Scotland Channel

But again, other PSBs do not perform and the BBC is asked to make up the difference.

My conclusion from the above is that it is high time that Ofcom dealt with the BBC in relation to PSBs as a whole in ways which better demonstrate impartiality and balance.

It is good to help the BBC to improve but it is not fair if the Corporation is being asked to make up for Ofcom's failures of media policy and regulation.

I should be happy to discuss these matters in further detail should you so wish.

Professor Robert Beveridge