Dear Sir

Please find attached a response from the Scottish Broadcasting Commission to the first phase consultation in Ofcom’s Second Review of Public Service Broadcasting.

Yours faithfully

Blair Jenkins
Chair
Consultation Response from the Scottish Broadcasting Commission to Ofcom’s Second Public Service Broadcasting Review – Phase One

The Scottish Broadcasting Commission will produce its final report and recommendations in September 2008. The comments made in this response to the PSB Review consultation document are provided to help ensure that Ofcom is able to identify all of the distinctive PSB issues facing Scotland, and these comments should not therefore be interpreted as indicating the likely outcome of the Commission’s deliberations. We trust that the Ofcom PSB Review will take full account of our final report.

We have confined our response to answering those questions identified by Ofcom in relation to Section 9 (“Scenarios for the UK’s nations, regions and localities”), although we do make reference as appropriate to issues raised in other parts of the consultation document. We have confined ourselves to commenting on the options and issues as they relate to Scotland.

As a factual point, the Commission would like it to be noted that it has not proposed a new national channel for Scotland (9.45). The Commission will not make proposals until its final report. The Commission has heard evidence from others on the possibility of such a channel, as it has on other possibilities, and has reported upon these.

1) **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 would agree that a PSB model involving only the BBC plus market delivery for content aimed specifically at Scottish audiences would be unlikely to secure the necessary conditions for plurality of provision in Scotland. From the evidence presented to the Commission, there are at least two important elements of any acceptable model:

- The solution will need to be secure and sustainable
- News and current affairs plurality is of paramount importance, but the model should also ensure competition for the BBC in other programme genres, in line with audience needs.

2) **Which model(s) do you think would be most appropriate in each of the nations and in the English regions in the long term, and why?**

The Commission will take a view on the appropriate PSB model for Scotland in its final report and will provide supporting arguments at that point. It will be clear from the response to question 1, however, that we do not regard Option 2 (BBC only) as an acceptable outcome for Scotland.

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

Increasing the currently low levels of network production from Scotland across all the PSBs is one of the most urgent issues being considered by the Scottish Broadcasting
Commission. It is of fundamental importance to developing a strong and sustainable production sector in Scotland, and to ensuring an appropriate degree of portrayal of Scotland on the UK networks. As part of its final report, the Commission will consider to what extent the necessary objectives can be achieved through voluntary commitments or whether more formal production targets for Scotland are required.

In relation to the ITV regional services in Scotland, the Commission would expect to consider making recommendations in respect of whether further changes would be appropriate to non-news programme quotas for STV and Border, and on whether any other changes to ITV regulatory requirements are needed in the short to medium term.

4) What are your initial views on the preliminary options set out relating to ITV plc’s regional news proposals?

Regarding the ITV plc proposal substantially to merge the Border region with Tyne-Tees, the Commission has heard extensive evidence that this will not produce a satisfactory outcome for viewers in the Scottish parts of the Border franchise area. The Commission will present its own views in its final report in September 2008, which should be in time to inform the proposed Phase 2 consultation by Ofcom on the policy options. At this time, the Commission would welcome further information from Ofcom on the nature of “the extensive research and evaluation programme” being undertaken in relation to this issue. (Consultation, page 114)

Scottish Broadcasting Commission
June 2008