

COMMUNITY MEDIA ASSOCIATION

Response to the consultation: Ofcom's Second Public Service Broadcasting Review – Phase One: The Digital Opportunity consultation

The Community Media Association (CMA) is the UK representative body for the community media sector. It supports and represents community based radio stations, local and community TV operators, community based internet media groups and independent community film producers. Community media organisations offer numerous volunteering and training opportunities for people in disadvantaged communities, often marginalised by mainstream media, to produce media to tell their stories in their own ways and to communicate and engage with the wider public.

Through community media projects:

- **new voices and faces are brought to the airwaves and the screen;**
- **local issues are presented in informative and engaging ways;**
- **health, education and economic resources in the community are promoted;**
- **the democratic process is enhanced as people become more engaged in the issues facing their own and the wider community**
- **local talent is developed increasing the talent pool for mainstream radio and television**

As such, it is clear that community radio and community television broadcasters deliver on many of the public purposes required of Public Service Broadcasters as defined in the Communications Act 2003. Therefore we urge Ofcom (and the DCMS) to consider broadening the definition of what services could be considered both as Public Service Broadcasters and public service content providers to include community radio and local and community television organisations. The public service landscape has changed since 2003 and this review needs to look forward to the future and new providers and not solely at incumbent major broadcasters some of which may want to withdraw from some of their public service requirements as the broadcasting ecology changes.

We note that the Consultation document makes no mention of radio and in that sense it is flawed, concentrating solely on the incumbent television broadcasters. With regard to television we support the views of United for Local Television (a coalition of providers and supporters of community, small local commercial and municipal television) that there should be local television services universally available on free to air television and echo the statement from Ian Stewart, MP, Chair of the All Party Parliamentary Group on Community Media:

'UK citizens are amongst the least well served in the entire democratic world for access to local news and information from television. I feel very strongly that local TV must be extended so that everyone has access to a local channel on Freeview no matter where they live and without the need to subscribe to pay-TV or the Internet'.

Local public service television is a key element in enhancing the diversity and plurality of the UK's television offering to its citizens and as such should be facilitated to develop and grow and should be classed as the third tier of television broadcasting as is the case for community radio.

Our responses to the specific questions asked in the consultation document are set out below.

Section 3. *How well are the public service broadcasters delivering public purposes?*

i) *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 in the living room as a shared activity will continue to be a primary source of national, regional and hopefully local news and information for UK citizens. Crucially it will continue to be vital for people who are disadvantaged due to poverty, for whom pay to view television is not an option. Local television, whether based on community, small commercial or municipal models, is also vital to ensure that people feel connected with their neighbourhoods and communities.

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

Yes. UK programming reflects and reinforces the UK's diverse cultural identity in a way that non UK programming cannot. There is a need not just to increase the percentage of UK produced public service content but also to widen the variety and localness of production in the UK.

Section 4. The changing market environment

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

While other digital channels and interactive media may carry some public service content it should be noted that this is not universally accessible, due to cost to the consumer and lack of adequate broadband coverage in many non-metropolitan parts of the UK. Therefore a sustainable system of public service broadcasting on television must continue.

Section 5. Prospects for the future delivery of public service content

i) *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?*

There should not be an assumption that free to view television will decline in favour of new platforms – young people not watching now will grow up and have children!

It is important that the BBC and the commercial PSBs continue to have a remit to produce "less favoured" genres including children's programming and regional news.

We support the Public Voice detailed submission on this question.

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

We support the Public Voice submission on this question.

Section 6. Meeting audience needs in a digital age

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

We agree with Ofcom's vision for a system that:

- delivers high levels of new UK content meeting the purposes of public service broadcasting – increasing our understanding of the world through news and analysis, stimulating knowledge and learning, reflecting UK cultural identity and making us aware of different cultures and alternative viewpoints;
- provides public service content which is innovative, original, challenging, engaging and of consistently high quality;
- is available in a form, and on a range of platforms to achieve maximum reach and impact;
- ensures competition for the BBC in each public purpose with sufficient scale to achieve reach and impact;
- exploits the distinctive benefits of different delivery platforms; and
- supplies diverse content which meets the needs of all communities within the UK.

We would argue that in order to deliver on this vision Ofcom and the government must address the lack of plurality of voices and recognition of the diversity of nations, regions and communities currently on offer from mainstream broadcasters. Local public service television and community radio broadcasters produce content that fulfils on many of the points above and should be included in the definition of Public Service Broadcasters.

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

We would echo the Public Voice submission as we believe the case for plurality and competition for quality in public service broadcasting is essential. It should be a clear and enduring part of public policy to seek to maintain such plurality. However we do not believe that plurality is achieved just because of the proliferation of platforms. True plurality is achieved by ensuring that the diversity of the UK is represented by the public service broadcasters – through regional and local programming, valuing peoples' unique voices, accents and languages and empowering citizens and communities to have ongoing involvement in the media.

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

While other digital channels and interactive media may carry some public service content it should be noted that this is not universally accessible, due to cost to the consumer and lack of adequate broadband coverage in many non-metropolitan parts of the UK. Therefore a sustainable system of public service broadcasting on television must continue.

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

Yes.

Section 7. Future models for funding and providing public service content

i) *What are your views of the high-level options for funding public service content in future?*

Enabling plurality and recognising and valuing diversity are key to the provision of public service content. As the existing explicit licence fee funding for the BBC and the implicit funding for commercial public service broadcasting is declining, new sources of funding or public subsidy will be required for providers other than the BBC in the future, including new providers.

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

Yes.

iii) *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?*

Model – Evolution – This will inevitably be the model through the transition stages until DSO is completed. Competition is crucial to the BBC maintaining standards.

Model 2 – BBC only - We cannot agree that the BBC should be the only paid for provider of public service content. We therefore reject this model.

Model 3 – BBC/C4 plus limited competitive funding. We would be concerned with this model that Channel 4's remit as a PSB should be increased rather than diluted. Also that any competitive funding should be available to new entrants including community broadcasters on a fair basis.

Model 4 – Broad competitive funding. We believe that the BBC should remain as the main PSB in the UK, so while this model could open up funding to new entrants as in Model 3, we would need to see the detail on how this model would work before we could support it.

Section 8. Options for the commercial PSBs

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

Further public support for Channel 4 can only start once we are certain there is a strong BBC. It is important not to undermine one to help the other. However, if Channel 4 does receive public funds or subsidy they will need to demonstrate public value throughout their services.

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

None particularly.

Section 9. Scenarios for the UK's nations, regions and localities

i) *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?

Television and radio play a vital role in reflecting the diversity of the UK's nations, regions and localities. Regional programming matters greatly to audiences, as does local broadcasting. In many localities and in the nations of the UK there is serious dissatisfaction with the television offering in terms of localness. Both community and commercial business models have worked for some time for the few local television broadcasters currently operating. Therefore we would argue that one of the best ways to deal with this dissatisfaction would be to enable community and local television to develop, using business models already tried and tested.

ii) 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?

We believe, as members of United for Local Television and Public Voice, that local TV has the potential to deliver immense social gain, playing a crucial role in the provision of local news, information and debate, bringing the community together and promoting active citizenship. Local TV would allow citizens to see and question local decision makers; as well as encourage viewers to make the most of local facilities. The research conducted by Ofcom for the Digital Dividend Review demonstrated high support amongst the UK public for local TV on Freeview, with support across all ages and demographics. In particular, we suggest that the most vulnerable members of society have the most to gain from access to a local TV service, but are least likely to benefit if these services are restricted purely to broadband internet. It is important that Ofcom undertakes cost benefit analysis on all of the policy options for local TV in the UK, including the option of reserving DTT multiplex capacity to enable universal provision of new local channels.

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

See 3.ii

iv) 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.)

We believe that ITV should continue to provide free to air news services as a counterbalance to the BBC. Should ITV relinquish this public service then we believe that the money "freed up" should be available to other producers including local and community broadcasters to replace the services lost.

Section 10. Prospects for children's programming

i) Do you agree with our assessment of the possible short term options available relating to children's programming: are there any other options available?

We agree with the Public Voice submission on this issue.

Section 11. Timetable for implementing a new model

i) 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?

Yes, if not before.