

Ofcom's Advisory Council for Northern Ireland

Modernising the BBC's Operating Licence – Consultation submission

The Communications Act 2003 requires Ofcom to establish and maintain Advisory Committees for the different parts of the United Kingdom.

Ofcom's Advisory Committee for Northern Ireland (ACNI) advises Ofcom on the interests and opinions of citizens and consumers in Northern Ireland in respect of communications matters.

We are independent and our views do not represent the views of Ofcom or its staff.

Please accept this document as the Committee's submission to Ofcom's Consultation regarding changes to the BBC's Operating Licence (BBCOL). We appreciate the opportunity to contribute to this important modernisation of the BBCOL.

Introduction

ACNI believes that the BBC is the cornerstone of the provision of high-quality news, current affairs, and other content for the audience in Northern Ireland. No other organisation comes close to delivering the breadth and depth of content, or the levels of investment in Northern Ireland's creative industries and creative economy.

The Committee is hugely supportive of the role of the BBC, its staff, its efforts to deliver its Public Purposes and its benefit it brings to the audience and other stakeholders in Northern Ireland.

ACNI is in full support of the modernisation of the BBCOL to ensure the audience can be best served by the BBC for the remainder of this Charter and beyond.

We support the three principles of:

1. a) incorporating online provision.
2. b) providing the BBC with greater flexibility in how it can best deliver to audiences;
and
3. c) increased transparency to hold the BBC to account.

However, we have significant concerns regarding a number of the consultation proposals, and we will outline these in response to the consultation questions.

The areas of concern include:

- 1) The lack of clear measurement / metrics set out by Ofcom as to how the BBCOL decisions will be reviewed and evaluated.
- 2) Lack of any measurable targets to safeguard non-news programming made in the devolved nations, for the devolved nations.

- 3) The timeliness of the stepping in process and the ability to prevent sub-optimal decisions being taken and prevented and reversed.
- 4) The BBC's ability to deliver content for the devolved nations that is easily discoverable on online/digital platforms.
- 5) The BBC's ability to be as transparent as Ofcom (and the audience) requires regarding editorial process and programming / content decisions.
- 6) Any reference to ensuring that Network production from Northern Ireland does not reduce from current levels.

Question 1:

What are stakeholder views on how Ofcom should assess and measure BBC performance.

ACNI understands that Ofcom wishes to move to a much more flexible regulatory regime for the BBC. We support the removal of unnecessary checks and balances that simply produce red-tape and increase unnecessary challenges, take additional time, and place a financial and resource burden on the BBC (and Ofcom).

However, we view the current proposals as moving too far away from a recognised structure, too quickly and that there is a lack of clear measurement and/or metrics set out by Ofcom as to how the BBCOL decisions will be reviewed and evaluated.

We would suggest at a minimum there should be a "stepping-stone" stage where the BBC moves from current hard quotas to a more flexible regime. That would give the BBC and Ofcom a roadmap to ensure a smooth transition and give the audience and other stakeholders the confidence that new systems are working rather than giving the BBC total flexibility at the initial stage.

This roadmap should have a baseline level of production, conditions and guidelines to assist the BBC and stakeholders understand the transition and how performance will be measured in a more flexible regulatory regime.

ACNI sees one regime being dismantled, without a clear understanding of how the new regime will work in practice.

This said ACNI strongly believes that a measurable level of content delivered and produced in the nations and regions is required.

To ask the BBC to be transparent is not enough – clear reporting structures are required.

The proposals in the consultation give the BBC freedom to simply outline its plans and report its own performance do not give adequate protection in vital areas of the BBC's Charter defined remit.

With no clear measures for Ofcom to hold the BBC to account – the BBC can use its own rules to judge its output and decision making processes. Any 'challenges or 'concern' by Ofcom come after the event, or at least once the decision is in motion. Establishing a

measurable level of production ensures there are deliverable targets – as a result quality can be assessed as a second tier to the process.

In addition, the call for greater transparency is unpersuasive, as the BBC in spite of sustained calls from Ofcom for improvement, in ACNI's opinion, the BBC's editorial openness is still not at a level where effective reviewing of plans is possible. This challenge is amplified the further from the Centre the information is found. The Nations have but a few pages in the Annual Report – much more granularity is required.

ACNI poses the simple question to Ofcom - Why would BBC transparency get better with more freedom?

With the BBC facing enormous financial pressures and will be disincentivised from prioritising elements of the remit not required by the regulator.

ACNI understands the limitations of quantitative quotas and has been broadly in favour of a move to more service-neutral, outcome-focused measures.

However, some programming requires greater protection. Non-news made in the nations/regions for those regions is clearly one such area.

It is impossible for ACNI to support a move to platform-neutral, outcomes until at least a baseline has been established. From the current BBC data available to the public, it is impossible even to establish how much first run BBC content is made for the audience in Northern Ireland as the data published in the Annual report is lacking in transparency and includes repeats.

Any future measurement of BBC performance – especially for the nations and regions should include a baseline quantitative level of production (including genres) and a qualitative framework covering at a minimum fulfilment of public purpose, reach, impact, and value for money. Put simply the ACNI is not convinced the current proposals will ensure the BBC will serve all its audiences and offer diversity of output and content from and for the whole of the UK.

We also note that Ofcom will use external data sources and engage with stakeholders – ACNI recommends any review of output by the BBC itself should include actual face to face, meaningful, audience engagement and feedback on the content delivered.

Question 2:

Do you agree with the proposals for Public Purpose 1? If not, please explain why.

ACNI supports the aim all the main proposals in the consultation in relation to Public Purpose 1.

ACNI has concerns in the BBC's ability to make news discoverable across the various platforms – the BBC News website/pages and the BBC News App for example have very

different user experiences in terms of discoverability and the depth of coverage on each platform.

When it comes to the ease of discoverability of regional news then this difference across platforms is amplified with App users having a much worse experience than web users. This is a distinct disadvantage for BBC News consumers who access the service via their mobile phone.

Northern Ireland viewers watching the live feed on the BBC iPlayer do not currently receive BBC News for Northern Ireland – after the main flagship network programming the feed shows BBC London news. There needs to be clear conditions set by Ofcom to ensure viewers in each nation and region at a minimum level can watch their own programming on all digital platforms (both live and catch-up).

Before implementing the proposed changes Ofcom should confirm that the BBC has a viable and deliverable proposal to be able to fulfil this requirement. The BBC's Digital First aspirations – are just that, an aspirational speech by the Director General. There appears to be no clear roadmap published.

This proposal would require a technical as well as editorial proposal – so understanding timeline and cost is vital here.

ACNI would like to see a much clearer statement from Ofcom regarding what it expects from the BBC regarding discoverability on the non-linear platforms including an understanding of the content from the nations and regions and their prominence.

ACNI is also concerned that news for the devolved nations is a “one-size fits all approach” – with the digital offering mainly reflecting the 1830 regional news programme editorial agenda, and therefore aimed at the age profile for those programmes. In any new Operating Licence, the BBC should be encouraged to offer not just a wide range of news, but ensuring it is accessible to a broad demographic, including devolved nations / regional news relevant to and accessible by young(er) people.

ACNI supports the change to annual quotas away from daily calculations, but underlines Ofcom's concern about frequency of bulletins/updates and supports wording to ensure regular news across dayparts every day of the year.

To this point ACNI believes that news for children / young people is as important as news for adults and does not support the decision to suspend Newsround over Christmas on television for two weeks. Some sort of service should be offered on the linear service even if at reduced duration.

At the time when young people may be acquiring new devices as presents, it also seems counter intuitive when trying to attract a younger demographic, to not offer a news service for young people on Christmas Day, Boxing Day, and New Year on the Newsround website. Again, ACNI would argue that updating of key stories for children and young people should be an Operational Licence requirement – even if that is only daily during the holiday period.

Question 3:

Do you agree with the proposals for Public Purpose 2? If not, please explain why.

ACNI supports the aim all the main proposals in the consultation in relation to Public Purpose 2.

We encourage Ofcom to ensure the BBC is fully committed to reflecting the whole of the UK in its output in relation to this Public Purpose including the devolved nations, which in many cases have different curricula. This means clarity in the funding for each of the nations and regions in regard to content produced relevant to the specific differences.

In terms of adult education – again the requirements and differences in the devolved nations need to be reflected in output and monitoring.

Question 4:

Do you agree with the proposals for Public Purpose 3? If not, please explain why.

ACNI supports the aim all the main proposals in the consultation in relation to Public Purpose 3 but has serious concerns about reporting, monitoring and transparency. (See response to other questions in regard to this).

Question 5:

Do you agree with our preliminary view on the BBC's request to change Operating Licence conditions 2.21 and 2.32 for BBC Four, including our proposal to remove BBC Four's peak original quota and set the "all hours: quota at 65% instead of 60% as requested by the BBC? If not, please explain why.

ACNI understands the rationale for the changes to BBC Four's change request.

It is right that the BBC reviews the value it derives from investment in programming. At a time of economic pressure, savings must be made and ACNI views sensible financial decisions which reduce some services as being an unwelcome necessity.

However, we have real concerns about the BBC argument for change here – the argument is about increasing audiences for programming, NOT increasing the range and diversity of output to gain maximum reach.

When the BBC refers to "audience needs" ACNI is concerned this is shorthand for "chasing larger audiences".

ACNI strongly believes the BBC requires the flexibility to deliver for audiences (and make cost savings), but that is deliver for all audiences, not just mass audiences.

For the long terms strength and impact of the BBC it needs to serve audiences across the whole of the UK. It may be better to make a number of diverse programmes that each serve

a unique, small, distinct audience, than one programme that attracts a mass market large audience.

Impact cannot just be measured in volume but must also be measured in reach, distinctiveness, and variety of programming.

Question 6:

Do you agree with the proposals for Public Purpose 4? If not, please explain why.

ACNI supports the inclusion of online with broadcast services when reviewing the BBC's delivery of Public Purpose 4.

ACNI supports the principle of the BBC being more open about its delivery of representation, diversity and nations and regions production.

ACNI believes strongly that the BBC must reflect, represent, and serve the diverse communities of all the UK's nations and regions. Research shows that audiences value diverse views and portrayal from broadcasters.

Ofcom's research has recently shown that audiences rated "content that features my region / Scotland / Wales / Northern Ireland" as one of the lowest aspects of BBC satisfaction.

ACNI has deep concerns about this.

If with the financial pressures the BBC is facing Ofcom decides not to have a real measure of volume of in-region programming, ACNI fears there is a serious risk that, over time, the depth and breadth of content made for audiences in Northern Ireland will be reduced. Further safeguarding of non-news is required – and needs to go further than the Consultation documents proposes.

The depth and breadth of content made specifically for audiences in Northern Ireland and the devolved nations will be reduced. This is a key part of the BBC's remit and ACNI believes a quota is essential to maintain a baseline level of programming.

The data in the consultation document shows that over the last 10 years the volume of production of "at risk" genres has fallen by around 1000hrs or more than 60% - we would see the same thing happening in the nations over time and this decline would be difficult (if not impossible) to reverse

We already see that local programmes are becoming less culturally specific because they will be commissioned with network audiences in mind.

The BBC offer will become less relevant and engaging for NI audiences, who place a uniquely high value on local content as part of the mix and this will be counterproductive regarding the BBC strategy to enhance the value and relevance of the BBC to audiences across the UK, including the devolved nations

The Channel 3 regional licensee, UTV (and STV and ITV Wales) is likely to seek equivalent arrangements to end or reduce its non-news quota, thus reducing the public service offer even further. At a time when Channel 3 relicensing is about to occur this is a major concern.

Ofcom's own data shows how valuable local programming is seen in Northern Ireland.

If the BBC programming plans and performance fall short of Ofcom expectations, it will be very difficult to leverage improvements without a quota or alternative measures.

While Ofcom is proposing reducing quotas in favours of a more qualitative measurement of non-news output in the nations and regions ACNI believes that both quantitatively and qualitative measures are required.

Transparency

Currently ACNI feels the information provided in the Annual Report is not at a level that is granular enough to fully understand the BBC investment in content and engagement with its audience in the devolved nations.

As Ofcom points out currently the Annual Report does not break down the number of hours (or cost) of first run content and repeats made for the devolved services. Nor is there a clear breakdown of hours per genre for the nations. This level transparency is vital for the audience to understand the programming policy and decisions made in each of the nations of the UK regarding representation and portrayal.

As well as the hours of original content for Northern Ireland, ACNI would like through the Annual Report to have a far greater understanding of the range, quality, impact and spend of the BBC on local programming from the devolved nations.

It would also be beneficial to see original content volume and spend for content made inhouse and from regional independent producers as the BBC plays such an important role in supporting the independent production community.

Historically Ofcom has been highly critical of the levels of transparency of the BBC at almost every level.

We find it surprising that in this consultation Ofcom is expecting even great transparency when it is yet to be proven that the BBC is capable of or willing to be open to scrutiny to this extent.

One example of this in Northern Ireland is while the BBC website shows there is a BBC NI Committee, many members are "acting" and Minutes until very recently (the last month or so) had not been published since November 2020, so the public could see discussions, and even those published earlier are so brief it is difficult to fully appreciate debates on key programming and editorial issues. This is hardly transparency in action.

The Annual Report gives little space to detailed discussion and analysis of content from the nations, and significant work is needed to give ACNI confidence the audience is getting real and meaningful data.

But the Annual Report is just one engagement mechanism and is “one-way”.

We also strongly believe that the audience of the BBC (and the BBC itself) will be better served if there is more direct engagement. This contributes another important layer of accountability and helps to continuously shape a content offering that is responsive to the diverse and evolving needs of audiences.

This would also serve important media literacy objectives in engaging audiences with the values and benefits of the BBC so that they derive maximum benefit and can play a fuller, informed role in directing how the BBC develops and is paid for.

In the past the NI Annual Review was one way to engage stakeholders and audiences with the BBC's performance and direction in this part of the UK. We would welcome further consideration as to ways to stimulate and strengthen these conversations in NI. This needs to include stakeholders across society in the widest sense and not just industry and those directly involved.

“Real people” are unlikely to read the Annual Plan, Annual Report or Ofcom Reviews. Greater direct community engagement would create a change and allow the BBC to show its strengths and discuss its weaknesses and response to those weaknesses with the audience.

We have mentioned earlier in our response that engagement with the audience is important for the BBC in terms of openness and transparency – but we also feel that engagement with key stakeholders – whether cultural, business, social, sport and education etc – are key to content delivery.

Amazing things happen in every region and nation of the UK – yet too often the BBC view of the world is narrow – engagement with stakeholders will deliver real time feedback and real time knowledge of key events, issues, and trends, which should help deliver more relevant, diverse, and engaging content. The BBCOL needs to ensure outreach and how programming ideas have been developed by engaging with stakeholders outside the BBC to ensure relevant and diverse content is delivered.

Investment in Nations and Regions production

The BBC “Around the UK” policy gave some clear commitment on content being devolved to the nations and regions but had limited detail or clarity regarding Northern Ireland.

ACNI has concerns this is related to the lack of investment in BBC infrastructure in Northern Ireland.

For example: when recent BBC News at Ten programmes have been broadcast from Scotland and Wales, the host has presented from the relatively recently invested in new

HQs in Glasgow and Cardiff. When the programme came from Belfast the programme was not broadcast from the BBC HQ, but from a conference centre.

The BBC Belfast HQ is the only nation not to have seen major technology and infrastructure investments and ACNI has discussed this regularly.

We acknowledge that there is investment planned but we question whether the investment that is finally agreed upon will be adequate to maintain Northern Ireland's BBC Hub at a level high enough for full Network production standards. ACNI remains concerned whether the BBC capital investment it is sufficient to ensure the BBC in NI can deliver its potential and play its part in delivering for audiences in all their diversity.

Our concern is that within the BBC Northern Ireland may be seen as technically/operationally inferior for Network production and therefore programming opportunities under the Around The UK initiative will not come to Northern Ireland.

While capital investment programmes are not part of the BBCOL, the impact of lack of investment – and ongoing investment - may be relevant and close scrutiny is required to ensure representation and portrayal of and from Northern Ireland does not fall.

ACNI has concerns about the risk of reduced diversity of content from BBC Northern Ireland through the current funding freeze and is clear that what the BBC currently delivers from and for Northern Ireland is more under threat than ever. If not protected then this may create a failure to deliver on its Public Purposes – especially Purposes 1 and 4.

At a time of intense pressure on the BBC budget, ACNI also has concerns that BBC structural changes that can work against the aim of reflecting audiences in all their diversity across the UK.

The proposed changes to the Operating Licence away from quotas amplify this worry - the pressure of cuts in itself creates a pull towards centralisation if not actively kept in check, therefore levels and targets need to be set at the level of individual nations than being replaced by platform neutral outcomes.

Stakeholders in Northern Ireland have worked very hard over many years to ensure Network production is delivered from Northern Ireland – quotas have been vital to achieve this. It is essential that any new regime protects the levels reached already and encourages further investment in the Nations and Regions to ensure Public Purpose 4 is fulfilled. Without quantifiable measures it is challenging to see how success or failure of delivery can be ascertained.

Co-Productions

Ofcom points out that there is a clear difference between programmes made in the nations and regions and programmes made for the nations and regions.

The BBC has already merged network and local commissioning budgets; this has benefits which ACNI recognises and is appropriate for some content but also puts at risk more culturally specific output designed for local rather than UK-wide consumption.

More and more ACNI see budgets being merged so programming for Northern Ireland is broadcast on Network services and “localness” is sometimes diluted to make content accessible or more relevant for those outside of Northern Ireland. This reduces the distinctiveness of programming made in Northern Ireland for the local audience.

While Ofcom clearly support this co-commissioning approach in the consultation document, ACNI has reservations.

There is no doubt localness is compromised, often network talent is used to front these programmes rather than local faces. Local terms and phrases are omitted from scripting in favour of language universally understood. These small dilutions, reduce the engagement local audiences feel for the output produced.

The programming certainly assists with the BBC’s requirement for a wider portrayal of Northern Ireland across the UK, which is welcome, but what will be missed – and remains a vital part of the remit – is the more culturally specific output that reflects NI audiences to themselves.

ACNI is also concerned that merging network and nations’ commissioning will mean that fewer programmes will be commissioned for a NI (or Scotland/Wales/England-OoL) only audience which will mean there is much less room for culturally distinct and specific content that is of particular local interest (and nurtures local talent).

News and Current Affairs

ACNI supports the continuing quota for News and Current Affairs.

While there is no mention of news and current affairs in the nations being cross-platform / digital in this section of the consultation we encourage Ofcom to ensure high quality regional news is available on all the BBC services.

As we stated in the ACNI answer to Question 2 the ACNI has concerns is in the BBC’s ability to make news and local programmes discoverable across the various platforms.

Before implementing the proposed changes Ofcom should require comfort that the BBC has a viable and deliverable proposal to be able to fulfil this requirement.

ACNI would like to see a much clearer statement from Ofcom regarding what it expects from the BBC regarding the discoverability of content from and for Northern Ireland (and other nations) on their non-linear platforms.

Non-News Programming

While ACNI believes the BBC should be given operational flexibility to deliver content across platform for the audience we also believe that programming for the regions should be subject to a quantifiable target, rather than leave levels of commissioning to the BBC's decision making processes.

ACNI understands the limitations of quotas attached to specific broadcast services and believes that there are options for more up to date, platform neutral requirements which both safeguard the value of local content and provide the BBC with greater flexibility in deciding how to best meet its remit in this regard

Just as quotas will remain for programming made in the nations and regions for network consumption we believe those quotes are required for in region consumption too.

It must be remembered – and Ofcom's recent Media Nations report evidenced the fact – that among all the Nations, audiences in NI place an especially high value on local content. Although in reality it accounts for a very small proportion of the BBC TV offer for Northern Ireland, it over delivers very well regarding audience performance.

Local content is a vital part of the mix regarding how public service is typically experienced in Northern Ireland (as indicated by the significantly high audience for regional news too in NI than other parts of the UK), and a range of culturally specific local programmes that is intrinsic, essential and – after many decades – expected from broadcasters.

ACNI takes the view that as most consultations are by their nature Ofcom stakeholder and industry facing – the input and submissions from the public/audience regarding the value of local programming may be underrepresented.

Representation of NI audience interests within the BBC are impacted by governance issues, with no Board member for Northern Ireland throughout the five years of the Charter period so far, no permanent NI Director, a Committee system that is not open and effective as already mentioned, and with no real structures for audience engagement.

We are concerned that there is limited audience awareness let alone voice in this very important consultation.

Network programmes often have higher budgets and productions standards, but often the local commissioning allows new entrants from the independent sector to gain production experience and profile, without the BBC taking significant risk. Without clear and quantifiable production levels the eco-system in the nations risks breaking down.

In addition, in Scotland the audience has both BBC Scotland and BBC Alba as well as the network services and other PSB's. Wales has S4C. In Northern Ireland BBC NI and UTV are the sole providers of PSB content from and for the audience here. Any reduction in content from BBC Northern Ireland would be felt to a greater extent here as there are no other supplementary services providing relevant content.

UTV has a quota for regional programming, it would seem strange that the publicly funded PSB does not have the same regulatory framework.

ACNI notes that the BBC delivers significant content in the Irish Language and supports programming for the Ulster Scots community in Northern Ireland, just as in Wales and Scotland indigenous language content is supported.

Nationally Ofcom research has showing concerns around representation and portrayal are real among all audiences – only 56% of all audiences rated the BBC highly for representation and portrayal, the lowest positive rating of all the BBC's public purposes.

Discoverability

ACNI supports the new BBCOL being cross platform – covering radio, television, and digital services. ACNI has discussed many times how services from the nation's regions are more difficult to discover on BBC digital services.

Also, on the iPlayer and BBC Sounds – Network services feature more prominently than national/regional and local services. The BBC even under the last DG spoke about the personalisation of digital services to make them more valuable to the audience. ACNI believes one of the first personalisation is location and offering content relevant to that licence fee payers' local area and geographical interest

Devolved decision making

Representation and portrayal in content is only element of diversity – and diversity of decision making is also required. Commissioning, budget setting and scheduling is still concentrated in London.

The BBC must be seen to devolve decision making powers away from the centre with commissioning and policy having a far greater regional footprint.

With digital services likely to be included in the Operating Licence moving forward, then it should be possible to pass more control to the nations and regional services as management of non-linear services is simpler in content terms than linear (scheduled) channels.

Question 7:

Taken together, do you agree with the proposals for a new Operating Licence? If not, please explain why.

ACNI believes Ofcom has set out a proposal for the BBC Operating Licence that delivers a flexible approach to delivering the output in the coming years.

We support the three principles of:

- a) incorporating online provision.

- b) providing the BBC with greater flexibility in how it can best deliver to audiences;
and
- c) increased transparency to hold the BBC to account.

However, as we have outlined throughout the submission we have significant concerns regarding a number of the consultation proposals

The areas of concern are:

- 1) The lack of clear measurement / metrics set out by Ofcom as to how the BBCOL decisions will be reviewed and evaluated.
- 2) Lack of any measurable targets to safeguard non-news programming made in the devolved nations, for the devolved nations. We believe the position in the consultation is wrong and requires more rethinking, noting options for more up to date, platform neutral requirements which would both protect local content and provide the BBC with greater flexibility.
- 3) The timeliness of the stepping in process and the ability to prevent sub-optimal decisions being taken and prevented and reversed.
- 4) The BBC's ability to deliver content for the devolved nations that is easily discoverable on online/digital platforms.
- 5) The BBC's ability to be as transparent as Ofcom (and the audience) requires regarding editorial process and programming / content decisions.
- 6) Level of Network production from the nations and regions – specifically Northern Ireland.

Monitoring by Ofcom

While Ofcom states it will be a rolling review and monitoring of decisions and outputs – the main tools are the BBC Annual Plan, the BBC Annual Report, and the Ofcom Annual Assessment of the BBC – these run over an 18-month timeframe.

Any decisions taken by the BBC that have a negative outcome may be difficult to correct, departments may have been cut, staff moved on, events missed etc.

Some form of both qualitative and quantitative measurement is required in almost all areas to ensure the BBC is adhering to the letter and the spirit of the Operating Licence.

In the commercial PSB's there are clear quotas. It is strange that these – or a similar mechanism - are not in place for the publicly funded PSB.

Unfortunately, in ACNI's view many of the enforcement measures at Ofcom's disposal have the risk of being counterproductive. The ultimate sanctions of a fine, simply takes money away from front line PSB delivery.

There needs to be clear instruction to the BBC from Ofcom on what transparency means and how success is measured. This should go beyond audience reach to include quality and distinctiveness, value and impact, delivery against public service aims and value for money.

Whatever the pressures on the BBC any new regime must ensure that proportionate commitment to the Nations by the BBC must remain the same and deliver investment, quality, range and cultural specificity.

We reiterate that any future measurement of BBC performance – especially for the nations and regions should include a baseline quantitative level of production (including genres) and a qualitative framework covering at a minimum fulfilment of public purpose, reach, impact, and value for money. Put simply the ACNI is not convinced the current proposals will ensure the BBC will serve all its audiences and offer diversity of output and content from and for the whole of the UK.

Ends.