



Consultation response form

Your response

Better Media welcomes the opportunity to take part in ongoing discussions about the future regulatory framework for broadcasting and wider media regulation in the UK. We are keen to make a positive, constructive contribution that supports Ofcom in meeting its statutory duties to citizens, promotes democratic accountability, and strengthens trust in the media system.

Our interest is grounded in a commitment to open, plural and civically accountable media markets that serve public purpose outcomes first, including social cohesion, cultural expression, opinion diversity, and local and national democratic participation. We bring experience working with independent, community and civic media providers, alongside policy analysis focused on competition, transparency, and the effective use of communications infrastructure as a foundational public resource.

Better Media would welcome the opportunity to engage with Ofcom, policymakers and other stakeholders to explore how regulation can better support diversity of supply, innovation, and fair access across both legacy and emerging platforms, and to contribute evidence and practical insight to the development of a future-facing, proportionate and democratically robust regulatory framework.

Better Media Broadcast Regulation Issues

The rapid transformation of the UK media environment has exposed the limits of regulatory frameworks that were designed for a broadcast era defined by spectrum scarcity, centralised institutions, and vertically integrated production and distribution. Ofcom's *Transmission Critical* report and its wider review of Broadcast Regulation correctly identify pressures arising from global platforms, changing audience behaviours, and financial strain on legacy public service broadcasters.

However, from the perspective of Better Media, these challenges also present an opportunity to reframe the purpose and direction of media regulation in ways that are better aligned with democratic resilience, civic accountability, and the realities of a networked media economy.

Better Media's work is grounded in the view that communications infrastructure is not merely an industrial sector, but a foundational civic system. Regulation should therefore be oriented towards public purpose and social outcomes, rather than institutional preservation or market consolidation.

In an environment where more people in the UK now engage with decentralised platforms because they enable participation by many independent producers, it is increasingly clear that plurality,

diversity of supply, and local accountability are generated through distributed systems, not centralised gatekeeping.

The questions set out in this issue map are intended to support Ofcom in moving from a model that implicitly defends incumbent scale, towards one that enables open social markets rooted in the UK and responsive to the needs of citizens first.

The issues identified by Better Media call for a shift in regulatory thinking from Public Service Media to Public Purpose Media. This reframing places emphasis on the civic outcomes media should deliver, such as social capacity building, social integration and assimilation, cultural expression, opinion diversity, trust, and accountability, rather than on the organisational form or historic status of providers.

It recognises that public purpose can be delivered by many actors operating at different scales, including small, independent, and community-focused producers, provided the regulatory environment enables fair access, open competition, and democratic accountability.

Our response to this consultation, in the form of an issue map, highlights concerns that current policy responses risk reinforcing concentration, protectionism, and cartel-like arrangements in transmission, distribution, and prominence, particularly if sustainability is defined narrowly in terms of institutional survival or global competitiveness.

Better Media argues that globalised, export-led media production will continue to be supplied by the market, but this should not come at the expense of UK citizens' needs for locally accountable communication, civic participation, and social cohesion.

Below is our issue map, incorporating a shift from Public Service Media to Public Purpose Media and explicitly grounding regulation in a distributionist, civic, and decentralised model of media development:

1. How can UK media regulation move beyond the concept of Public Service Media, which is historically tied to centralised institutions and broadcast-era delivery models, towards a clearer and more flexible framework of Public Purpose Media that prioritises civic outcomes over organisational form?
2. Thereby, what mechanisms can Ofcom use to define and measure public purpose in media in terms of outcomes such as social capacity building, social integration and assimilation, cultural expression, opinion diversity, trust, and accountability, rather than relying on institutional status or legacy remit as a proxy for public value?
3. How can regulation support a distributionist media economy in which public purpose is delivered by many small, independent and community-rooted producers operating within open social markets, rather than being concentrated within a small number of industrialscale providers?
4. Given that more people in the UK now use YouTube than the BBC Television, largely because it enables diversification of content creation rather than centralised gatekeeping, how will media regulation distinguish between platform infrastructure and editorial concentration, and avoid confusing scale of access with democratic legitimacy?
5. How will media regulation ensure that discoverability, prominence, and platform engagement frameworks actively widen diversity of supply and local accountability, rather than reinforcing the visibility of incumbent national institutions at the expense of emergent and place-based producers?
6. In responding to the growth of global platforms, how will Ofcom avoid policy solutions that replicate gatekeeping through negotiated privilege, instead promoting open, auditable and contestable systems based on transparent rules, open data, and open protocols?

7. How will media regulation address the risk that UK media policy becomes overly oriented towards competing in global content markets, particularly in high-cost television production, while neglecting lower-cost, locally innovative and socially embedded forms of media that serve UK civic needs?
8. What regulatory distinctions will Ofcom draw between globalised media products, which the market can supply, and Public Purpose Media, which should prioritise UK citizens' educational attainment, health and wellbeing, social responsibility, economic participation, and democratic engagement?
9. How can Ofcom treat diversity of supply and plurality of voices as core indicators of media system resilience in the networked age, rather than focusing primarily on the stability or survival of specific legacy institutions?
10. How will regulation encourage innovation that emerges from distributed networks, peer-led production, open-source tools, and collaborative governance models, rather than privileging capital-intensive, vertically integrated media firms?
11. In planning transitions in distribution infrastructure, including broadcast, hybrid and IPbased delivery, how will Ofcom ensure that legacy platforms remain legitimate civic spaces for those who rely on them, and that citizens are not compelled into technological migration that reduces choice or participation?
12. What competition and market-design interventions will Ofcom consider to actively counter market concentration, break down cartel-like behaviours in transmission and carriage markets, and lower structural barriers faced by small and community-focused Public Purpose Media providers?
13. How will Ofcom ensure that regulatory systems, licensing data and market information are made available through open standards and reusable formats, enabling citizens, researchers and smaller operators to scrutinise how public resources such as spectrum and prominence are allocated?
14. What governance and engagement models will Ofcom adopt to ensure that civic media organisations, independent producers and citizen groups are treated as core stakeholders in defining public purpose, rather than marginal consultees alongside dominant commercial and institutional actors?
15. How will media regulation redefine universality so that it refers not simply to universal reach of national broadcasters, but to universal opportunity for participation, representation and locally accountable communication across the UK?
16. How can a Public Purpose Media framework be used to address concrete matters of public concern, including educational outcomes, public health, economic contribution, social cohesion, cultural participation, and a shared sense of local and national belonging, through distributed and place-based media activity?
17. Finally, what evaluative tests will Ofcom apply to determine whether its regulatory interventions are genuinely increasing trust, accountability, opinion diversity and civic participation, rather than stabilising incumbent power within a globalised and increasingly concentrated media market?

These questions are directly relevant to Ofcom's review of Broadcast Regulation because they seek to clarify how regulation can actively support a distributionist model of media development that is better suited to the age of networks. This includes recognising the legitimacy of legacy platforms, embracing technological innovation through open standards and governance, addressing market concentration, and redefining universality as universal opportunity to participate and be represented.

Taken together, this framing positions Better Media's ongoing work as a constructive intervention in the regulatory debate. It offers Ofcom a pathway to modernise broadcast regulation in a way that strengthens democratic life, supports a diversity of UK-based media producers, and ensures that public purpose, rather than institutional inertia or global revenue competition, sits at the heart of the future media system.