

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our provisional view of the market? Please provide evidence in support of your answer.</b></p>	<p>In the areas that have been addressed in the document we largely agree. However, we are concerned that audio drama is not explicitly referenced as a particular, distinct form of content.</p> <p>The UK market position of the BBC and BBC Sounds in the delivery of audio drama is unique and of particular interest to the writing community. The BBC is a market leader both in terms of the amount of content and (traditionally) its treatment of writers.</p> <p>There is significant concern that a lack of regulation in the digital audio arena is driving down rates of pay for creatives and importing some of the least desirable working practices from across the globe.</p> <p>The UK broadcasting sector has traditionally operated systems of limited licences for original content, resulting in ongoing opportunities for writers to benefit from the success of their work. International platforms are trying to undermine this system, preferring ‘buy outs’ of writer’s work for less than the current market value.</p> <p>The BBC has a key role to play in role-modelling commissioning practices that are fair to both creatives and audiences alike. It is vital that this role is protected.</p>
<p><b>Question 2: Do you agree with our analysis and provisional conclusions on BBC Sounds crowding out the commercial sector? Please provide evidence in support of your answer.</b></p>	<p>Yes</p>
<p><b>Question 3: Do you agree with our analysis and provisional conclusions about cross-promotion of BBC Sounds? Please give evidence to support your views.</b></p>	<p>Yes</p>

<p><b>Question 4: Do you agree with our analysis and provisional conclusions about the impact of BBC Sounds on podcast publishers' ability to generate revenue? Please give evidence to support your views.</b></p>	<p>Yes</p>
<p><b>Question 5: Do you agree with our provisional view that the test for opening a BCR in relation to BBC Sounds is not met?</b></p>	<p>Yes</p>
<p><b>Question 6: Do you agree with our view above on when changes to BBC Sounds might raise competition issues?</b></p>	<p>Yes</p>
<p><b>Question 7: What further detail, if any, would you expect to see in the BBC's Annual Plans and public announcements to enable stakeholders to meaningfully comment on its plans for BBC Sounds?</b></p>	<p>WGGB agrees that the BBC's current annual plans and public announcements are insufficiently detailed to allow for a meaning assessment of their plans and/or performance.</p> <p>This is especially true in relation to audio drama. For example, the latest plan simply states the following:</p> <p><i>Our strong commitment to audio drama remains. Radio 4 will invest in contemporary audio drama both on air and in podcasts – in addition to bringing listeners adaptations of Thomas Hardy and Dangerous Liaisons, and programmes inspired by DH Lawrence and The Jungle Book. Drama on 3 will be reinventing classic plays for our time – with an eco-version of Shakespeare's The Tempest and a celebration to mark the 400th anniversary of France's greatest playwright, Molière – as well as continuing to work with theatres closed by lockdown to bring their plays to a radio audience</i></p>

Beyond the obvious concerns about the lack of authorial diversity in this list, it is notable that there is no definitive information about the number of hours planned or which platform work is being commissioned for.

The removal in 2017 of the specific duty on the BBC to broadcast a minimum of at least 600 hours of original drama and readings each year has resulted in extensive cuts to what was BBC Radio's flagship content.

WGGB calculations suggest that at least 100 hours a year of new work has been lost.

Furthermore, commissioning data for audio drama is now obscured by the presence of Sounds with most in the industry unclear of where the commissioning is taking place.

We believe there is now a role for Ofcom in monitoring the BBCs output and reporting of audio drama.

Annual plans should specify:

- Number of hours of audio drama planned across the BBC
- Number of hours of original (first run) audio drama planned for radio (broadcast-first)
- Number of hours of original (first run) audio drama planned for podcast/Sounds-first

The annual reports should then detail performance against these figures. This would also allow Ofcom and others to assess the Sounds' market position in terms of drama output against other podcast platforms / providers.

The same arguments in terms of transparency of commissioning and the necessity for more detailed reporting can be made about audio comedy.

We believe that a public service broadcaster such as the BBC has a duty to take a collaborative and consultative approach to its editorial policies, engaging more with both the creatives that produce work for its platforms and the audiences that they are targeting.

The BBC annual report should therefore provide detail of the consultations and collaborations that it has entered into and more about the rationale behind its editorial decisions.

The BBC should also produce a more coherent vision for Sounds and how it fits alongside its broadcast output.

It remains unclear to many (writers, producers, listeners) whether Sounds is intended to be a destination platform in its own right, an audio "catch-up" service, a podcast player or music platform.

This confusion might be lessened if the BBC annual plans and reports dealt with Sounds separately to Radio.

**Question 8: Do you agree that further collaboration between the BBC and other players could bring benefits to the UK radio and audio sector?**

In part.

We agree that collaboration between the BBC and other UK based content providers could be beneficial in terms of knowledge and content. In financially difficult times, and under significant pressure from major international platforms, it makes sense for there to be a greater emphasis on collaboration where it helps establish the UK as a major provider of high-quality original audio content.

The BBC already has a strong global brand and reputation, and other providers could benefit from the additional 'reach' that shared content would offer, just as the BBC could benefit by getting its output to demographic groups who do not currently see the BBC as a regular destination for content.

However, the aggregation of third party content risks destabilising other areas of the industry and has the potential to have a detrimental impact on writers in particular.

The commissioning of content by the BBC is subject to collective agreements on pay and conditions. These agreements ensure that writers are appropriately remunerated for their work. These agreements extend from radio drama to podcasts and can be viewed at <https://writersguild.org.uk/rates-agreements/>

Work commissioned by independent producers and made available via other platforms does not fall under those agreements. As a consequence, writers (and other creatives) often receive lower rates of pay and fewer opportunities to benefit from the success of their work on platform.

The possibility of a mixed economy of content could result in writers (and other creatives) having produced similar formats of work but for very different rates of pay appearing on the same platform.

This outcome risks undermining the collective agreements already in place. For any progress to be made in this area, detailed cross-sector negotiations with the relevant trade unions are a necessity.