

Title:

Mr

Forename:

James

Surname:

Chisholm

Representing:

Self

Organisation (if applicable):

CHISHOLM

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

No concerns

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

I will send a separate narrative submission as Jim CHISHOLM. But I'll paste it here as well.

OfCom Response to PSB review

1. One thing I found difficult in reviewing the issues of PSB is that I am not aware of a defined remit for PSB. Is there a set of principles or goals against PSB, including both commercial and public sector organisations can be measured?
2. An observation is that words/concepts like "broadcast", "mass-media", "programme", even "News" are becoming redundant. PSB is now PSMedia
3. This point is accentuated by the fact that digital now accounts for more than half of all UK

advertising and double that of TV. Time spent figures (though I don't have them to hand), also show how internet and mobile services are now the dominant communications form.

4. Much of the report, anticipates an incremental evolution of current players. Most of the document, and the discussion relates to issues of enhancement, rather than a more robust response to the dramatic changes, challenges and opportunities we are facing in society. In this context the scope of PSB/M could well spread beyond the sole provision of

"programmes"

5. Given the rapidity of STEP changes (Society, Technology Politics, Economics), affecting peoples' lifestyles behaviours, needs, motivations and knowledge requirements, it is no wonder we are seeing convulsions in media performance. Traditional media no longer see the benefits in audience engagement from major (non-sport/ents) events that they once did.

During the Scottish Referendum, print circulations continued to show "normal" declines.

News audiences showed no discernible increase. All the attention boost was in social media.

6. For "Nations" read cohorts, ethnicity, lifestyle, challenge areas, etc

7. The reality is that while Social Media is our focus today, its successor is probably already lurking, and perhaps even its successor!

8. The traditions of "licence allocations", "funding periods" and "capital planning" no longer reflect the reality of the communication world today or tomorrow.

9. Incrementalism is no longer a valid approach. It inhibits potential innovation in the market, and rewards those incumbents who would otherwise succumb.

10. I am now advising my (mostly overseas) clients that their strategic planning in itself requires complete revision. They need to abandon their previous planning process and revisit all the factors, external and internal, today and in ten years time that will impact on the needs of society from their knowledge and entertainment services. This is particularly critical in the area of PSB/M which in itself should act as a catalyst in terms of positive social evolution

11. Let me conclude with thoughts as to the process I am envisaging:

- What will society look like in ten/twenty years time?
- What are the factors that will influence how this picture could change?
- What may the needs be of citizens in the communications/knowledge/entertainment space?
- What form of PSM in terms of hard and soft goals, audience types, services, "channels", players, etc will best serve society today, and in its positive evolution?
- Having redefined the supply requirement, only then can vital issues such as funding, partners, candidate players, secondary supply (production, sales, distribution, etc) can be reviewed.
- I would be completely against the idea that solutions involve the "partnering" of legacy players, specifically the notion that the BBC and local press jointly service local markets.
- There is certainly room to extend PSB to invite participation from new, and next generation service providers/producers. This might include the provision of an innovation fund to encourage new forms of social engagement.

I would be happy to clarify or elaborate on any of the points above.

Question 1: Do you agree with our assessment of the context in which the PSB system operates, and how the trends identified might affect the PSB system? In particular, do you agree with our analysis of the independent production sector:

The trends are in themselves adequate. However the context of their presentation, I feel under-estimates the scale of transformation we are witnessing in society and communications.

Question 2: Have we identified the key differences in Northern Ireland, Scotland and Wales?:

My thoughts on regions are more tied to a suggested higher level process relating to the actual role of PSB itself, today, and in ten years time. See below, and also accompanying note.

Question 3: Do you agree with our assessment that the PSB system remains strong overall?:

No. Your assessment considers performance with it's own perspective and not relative to what else is happening in communications. To simply say, that attitudes to news coverage improved, could simply be down to the fact that it was a particularly newsy year, which was very "attractive" in a televisual form.

Question 4: Given the resources available, to what extent is the system meeting the needs of as wide a range of audiences as practicable?:

That depends on what your definition of those needs is.

Question 5: Given the resources available, does the PSB system deliver the right balance of spend and output on programming specifically for audiences in Wales, Scotland and Northern Ireland and programmes reflecting those nations to a UK-wide audience?:

Within the frames of reference YES

Question 6: Is declining investment affecting the quality of PSB and is it a cause for concern?:

Your report suggests that the participants continue to provide an excellent service on average, though the decline in "news" (as defined) provision is a concern. Certainly I believe that provision in Scotland is inadequate.

However I believe that PSB - including the BBC - as such does not fully meet the potential needs of society. See separate note.

Question 7: Do you agree with Ofcom's provisional findings in the Review of C4C's delivery of its media content duties?:

n.a.

Question 8: To what extent do you agree with our assessment of the degree to which the non-PSB services play a role in helping to deliver the public service objectives? In doing so please set out your views on the delivery by the PSB portfolio channels, other non-PSB channels, on-demand and internet services and also radio services separately.:

This is a very big question, which requires answering beyond the references of this project. Again this relates to my wider concerns re the scope and remit.

Question 9: How likely are we to see steady evolution and have we identified all of the potential alternative scenarios and risks to the system?:

Having spent the last twenty years advising media organisations on strategic development and futurising, I believe that incrementalism is becoming redundant. I now believe that only a small proportion of legacy media organisations are going to survive another ten years. Neither the risk assessment, and as importantly any opportunity assessment have been covered in the depth that I believe could benefit PSB.

Question 10: How might incentives to invest change over time?:

Back to my central approach:

Need for far more radical review:

- What will society look like in ten/twenty years time?
- What may the needs of citizens be in the communications/knowledge/entertainment space?
- What form of PSB in terms of hard and soft goals, audience types, services, "channels", players, etc will best serve society today, and in its positive evolution?
- Having redefined the supply requirement, only then can issues of funding, incentives, distribution and production, can be revisited.

Question 11: Have we identified all the relevant ways in which the PSB system might be maintained and strengthened?:

No

Question 12: Does universal availability and the easy discoverability of PSB remain important and how might it be secured in future?:

Absolutely vital, particularly given the increase gulf between, have and have nots, and the vital need to improve communications / engagement within disadvantaged segments. I would argue that society is far better served by focussing PSB on these areas, with a goal to achieve positive change, rather than investing in high-brow minority interests, or mindless reality TV.

Question 13: Should we explore the possibility of giving greater flexibility to PSB institutions in how they deliver public service content, including examining the scope (in some or all cases) for regulating by institution, not by channel?:

Absolutely yes. PSB should be radically redefined to invite participation from new, and next generation service providers/producers.

This might include the creation of an innovation fund, to encourage entrepreneurs to develop Public Service Media concepts.

Question 14: Do the current interventions in relation to the independent production sector need to change in light of industry developments?:

Probably but can't comment

Question 15: Have we identified the right options when considering potential new sources of funding, are there other sources of funding which should be considered, and which are most preferable?:

There are a wide range of new opportunities available, subject to the redefinition of the PSB mission.

I will supply clarification of the above in a more detailed note as a separate submission.