

Title:

Ms

Forename:

Janet

Surname:

Muller

Representing:

Organisation

Organisation (if applicable):

POBAL

What additional details do you want to keep confidential?:

No

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

N/a

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

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:

I feel that the Irish language production sector in NI has been hugely disadvantaged by lack of investment and development. This is in spite of the sterling work carried out by the Irish Language Broadcast Fund under difficult circumstances. The ILBF struggles to produce high quality programming with few resources and in an unsympathetic context, in comparison with Welsh language programming in Wales and Gaidhlig programming in Scotland.

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

No. Ofcom previously highlighted the disparity in treatment of Irish language broadcasting in NI in comparison with Welsh in Wales and Gaidhlig in Scotland. It has also pointed out a lack of coherent planning and policy for Irish language broadcasting within the UK. In addition to the ongoing failure to include Irish language broadcasting in legislative provisions in the UK Communications Act and the BBC Royal Charter, Irish receives much lower levels of funding and the requirements put on the public service broadcasters in NI in relation to Irish are negligible compared to Wales and Scotland.

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

Not in relation to Irish. Whilst we recognise that the bulk of PSB responsibility falls on the BBC and we note the potential problems this creates, the BBC has failed to significantly redress its neglect of the Irish language, providing still only minimal radio coverage in Irish (with increasingly large elements delivered bilingually) and patchy, inconsistent and minimal TV programming. There is no news or weather output in Irish, Subtitling is often inaccurate and the BBC fails more often than not to use the diacritic mark, the sineadh fada correctly.

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

It services the Irish speaking community very poorly. UTV and Channel 4 produce no Irish language programming. Licensed radio stations both state and commercial provide no Irish language programming with the exception of minimalist half hour programming on BBC radio Ulster.

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?:

No. See previous responses.

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

The Irish language suffers historic and ongoing neglect. it requires more investment to even begin to catch up.

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

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.:

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?:

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

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

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

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?:

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

There is no support for the independent Irish language sector in NI with the exception of the ILBF. In spite of its best efforts, the ILBF has not had sufficient resources nor a sufficiently robust development brief in comparison with other duties, to ensure the development of a sustainable northern sector. This should be addressed through additional means. The ILBF funding also needs to be increased and made secure in the long term.

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?: