

Title:

Mr

Forename:

Richard

Surname:

Williams

Representing:

Organisation

Organisation (if applicable):

Northern Ireland Screen

What additional details do you want to keep confidential?:

No

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

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Northern Ireland Screen's submission is that:

- We do not deem 9% to be an appropriate quota for the UK Nations and would submit that the 17% target used by the BBC has a much stronger logic; that is, it correlates with the level of population in the UK Nations.

- We challenge Channel 4's assertion that it is more difficult for it to move production around the UK than it is for the BBC. While Channel 4 has the constraints of a commercial broadcaster, it has the flexibility of a publisher/broadcaster. These 2 factors balance each other out.

- The UK Nations' quota is largely a response to devolution in the UK. That being the case, it is critical that an appropriate mechanism is put in place to ensure that the UK Nations 'quota

delivers economic and cultural value fairly across each of the devolved nations. While we accept the limitations of quotas, our strong view is that the simplest way to ensure this fair distribution is to impose sub-quotas according to population size.

- Northern Ireland Screen strongly supports the need for Channel 4 to have long term stability in the form of a 10 year license. However, this longevity adds weight to the argument that the quota for the UK Nations should be 17%. Under a 10 year license, the quota must be appropriate in 2024 and not only in 2014.

- We note that viewers rate Channel 4 less favourably as portraying my nation/region to the rest of the UK than the PSB average. We strongly suspect that this rating would be much lower still if the question was asked of the audience in Northern Ireland.

- We note that the level of programming produced from Northern Ireland has been extremely low over the last 10 year period but that in contradiction to that the programming produced from Northern Ireland has been consistently above average in terms of audience and critical reaction. This fact challenges the assertion that Channel 4's commercial model would be negatively impacted on by a Northern Ireland quota.

- We also note that it is our experience that 50% of the value of every production produced in the Nations benefits elsewhere, with the vast majority of that value gravitating back to the South East and London - effectively the quota programming delivers about half the economic value of the budget. Accordingly, in economic terms, a 17% quota for the UK Nations has an actual value of 8/9%. This point adds considerable weight to the argument for the higher 17% quota.

Question 1: Do you agree with Ofcom's view that the current licence conditions remain largely appropriate to securing Channel 4's obligations? :

Yes

Question 2: Do you consider it would be appropriate to increase the out of England quota on the Channel 4 service? If so, please set out the reasons for setting a particular level for the quota and for the rate of increase to this level?:

Yes. As the UK Nations' quota is largely a response to devolution within the UK, the logical quota level is 17% representing an equitable split according to population size in the Nations.

As the UK Nations' quota is a response to devolution within the UK, it is critical that the quota is subdivided to ensure an equitable split across the 3 devolved Nations.

Question 3: Do you agree with our proposal to leave the existing licence condition for schools programming unchanged? What role do you consider the main Channel 4 service should play in delivery of its education remit? Are the existing licence conditions appropriate to this? :

Yes

Question 4:Do you agree with the assessment set out of the market changes and future challenges for C4C in sustaining delivery of Channel 4 and its licence conditions?:

Yes

Question 5:Do you agree with our view that the Channel 4 licence should be renewed for a ten year period? If not, please set out an alternative duration and reasons for it? :

Yes although we would stress that this adds strongly to the argument that the UK Nations quota should be 17% and be subdivided according to the relative size of the devolved Nations.