Title:

Forename:

Surname:

**Representing:** 

Self

**Organisation (if applicable):** 

Email:

What additional details do you want to keep confidential? :

Keep name confidential

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:

Question 1: Do you agree that the existing obligations on Channel 3 and Channel 5 licensees in respect of national and international news and current affairs, original productions, and Out of London productions should be maintained at their current levels? If not, what levels do you consider appropriate, and why? :

Question 2: Do you agree with ITV's proposals for changes to its regional news arrangements in England, including an increase in the number of news regions in order to provide a more localised service, coupled with a reduction in overall news minutage? :

Question 3: Do you agree with UTV's proposal for non-news obligations should be reduced to 90 minutes a week? If not, what alternative would you propose and why? :

Question 4: Do you agree with the proposals by STV to maintain overall minutage for regional content in the northern and central licence areas of

Scotland at 5 hours 30 minutes a week, as detailed in Annex 3? If not, what alternative would you propose, and why? :

Question 5: Do you agree with the proposals by ITV to maintain the overall minutage for regional content in Wales at 5 hours 30 minutes a week, as detailed in Annex 3? If not, what alternative would you propose, and why? :

Question 6: Do you agree with the proposals by ITV to reduce the overall minutage for regional content in the Channel Islands from 4 hours a week to 3 hours 20 minutes as detailed in Annex 3, while maintaining the present provision of a 30 minute early evening regional news programme? If not, what alternative would you propose, and why? :

**Question 7: Do you have any views on any other aspects of the nations and regions programming and production obligations of the Channel 3 licensees? :** 

Question 8: Which option would you prefer in respect of the news and current affairs in the Border region, and why? :

N/A - See Q10

Question 9: If option 2 were to be adopted, should ITV be required to provide separate transmission for the Scottish and English parts of the region on DTT? :

See response to Q8.

## Question 10: If you would prefer a different option to those set out in Questions 8 and 9 above, please explain what, and why:

None of the ITV Border proposals is in my opinion appropriate. Border's exclusive programming as it was prior to the Tyne Tees merger was diabolically bad. Comprising 30 minutes of daily inconsequential trivia, peppered with mediocre light-weight magazine style news, presented as if it were global financial meltdown. While ITV might understandably claim all sorts of measures are taken to ensure a distinctive Border Scotland service - the truth is that this rhetoric has long been used to convince London based regulators that this long-standing, peculiar transmission arrangement works, when in fact it doesn't. Local MPs, and community activists are obviously all in favour of a Border TV, and more in favour of a Border Scotland news programme. The reason for this is that to have such an outlet gives them a convenient platform that they perhaps wouldn't otherwise have. This however is a product of Border's existence, not a justification for it. The media needs of such stakeholders could equally as well, if not better be served by a Scottish broadcaster taking on the Border Scotland area.

I'm a Scot, living in South West Scotland, and I have always felt that being served by an English TV station disconnects me completely from Scottish life, culture and politics. Border TV always has had, and always will have an English 'voice'. The programming, continuity announcements, news content and even commercial content is English. Any Scottish content

seems to feel uncomfortable and out of context when it is shoe-horned into the normal output. It has no Scottish identity, no Scottish flavour, and it is frankly an unnecessary licence area which presumably exists only because of the technological limitations of the 1950s.

It is my opinion that in order for Ofcom to best ensure viewers of South West Scotland are best served by the Channel 3 licence holder that;

1) The Border Scotland area should be split from the existing Border area as a stand alone undertaking or,

2) re-advertised as part of the licences currently held by STV, on the understanding that they would have to provide a split news service (as they currently do with their Central Scotland and North Scotland services) or,

3) that ITV should be compelled to outsource a Scottish produced TV service relay STVs programming, including STV branded news for the Borders/South West.

It strikes me that Scotland has a strong and distinctive commercial TV service, which goes to great lengths to cover Scottish news, current affairs and culture, nationally and regionally. This is kept from viewers in the Borders/South West for the craziest of reasons. As the only other TV source of Scottish national/regional news is the BBC, the Borders/South West also lacks any sensible degree of TV plurality.

The kind of light-weight parochial coverage which became the trademark of Border TV would be best kept as a distant memory, joked about with friends. The TV equivalent of a shocking fashion faux pas of the past, which is remembered fondly, but which you'd rather not let your friends see the photos of. Let's not revive that old cringeworthy format which creates an endless stream of non-news in place of the tailored, contextual, Scottish content available to the more fortunate viewers of STV.

Question 11: Do you agree that the Border licence should be amended to reduce the proportion of regional production required to a sustainable level? If not, what proposals would you like to make? :

See Q10

Question 12: What views do you have on the proposal by STV and UTV to extend peak time to 11pm, which would extend the window in which they could schedule regional content that must be shown in peak time? :