

A response to the Ofcom Draft Annual Plan 2011/12

by the Ofcom Advisory Committee for Scotland (ACS)

1. ACS welcomes the opportunity to respond to Ofcom's draft plan for the coming year. We note that Ofcom's research underpins its strategic purposes (p.13) and underline our view that this work continues to have continuing value in the shaping of public debate and therefore is of considerable importance.

2. ACS has long taken the view that media literacy in a broad sense is of key importance for the effectiveness with which citizens and consumers approach the ramifying field of communications. We recognize that Ofcom, following the extensive cuts consequent on the Comprehensive Spending Review 2010, will no longer take a leading public role in this area. We therefore welcome the intention to widely promote media literacy research, as stated in par. 6.73. It is to be hoped that the definition and importance of media literacy work does not change too much now that it fits within the market research and consumer group at Ofcom, even allowing for the reduced budget for media literacy - and, because of this, Ofcom should explore new ways of making its excellent research as widely available as possible. We are interested to hear more of how this important outreach will be achieved.

3. ACS notes that pending introduction of a 'simplified governance structure' subject to the passage of the Public Bodies Bill, the Communications Consumer Panel (CCP) continues in weakened form, which is a particular concern given other changes across the consumer landscape. Along with the other national advisory committees, ACS is expected to give added focus to consumer matters in the future in the context of Ofcom's statement of a 'continued need for consumer policy' (p.14). We have consistently concerned ourselves with consumer issues, so this added responsibility goes with the grain. However, we are concerned that Ofcom ensures that we are adequately resourced for this task, given that the eventual demise of the CCP is expected and that the national advisory committees will have oversight of issues handled by the Advisory Committee on Older and Disabled Consumers, whose termination has also been signalled. In due course, Post too will need to be addressed.

4. ACS also notes that Ofcom's serious 'reduction of headcount' (p.17)

has impacted on the national advisory committees. ACS is concerned by the reduction of size of the Ofcom Scotland office to three officers with part-time administrative support. We believe that this should be monitored for its impact. ACS is also concerned by its own reduction by four members to a new core of six, including the new Content Committee member, when appointed. While ACS recognizes the general context of severe cuts that have taken place in Ofcom, it is also concerned that the Scottish office and committee retain their present credibility with stakeholders and the wider public in Scotland.

5. So far as the 'Efficient Use of Public Assets' is concerned, ACS wishes to make an observation in respect of clearing and releasing spectrum. When the interleaved spectrum is packaged up for auction, Ofcom should be mindful that this spectrum is likely to be of use in Scotland not only for Digital Terrestrial Television (DTT), but also to help meet the NGA requirements (aka super-fast broadband) for digital hubs in all communities. For example, wireless broadband might be used in less densely populated rural communities where it is not viable to lay fibre. While Scotland has a greater provision of interleaved spectrum than many other areas, it is important to consider these other uses when packaging the spectrum, as DTT tends to require blocks of 8MHz, whereas wireless would generally use 5MHz channels.

6. Broadband and broadcasting policies are increasingly intertwined and need to be thought of in the same framework. Thus, it could be argued that a necessary condition for IPTV to successfully provide local TV content would be the seamless integration of standard TV and broadband (e.g. on the lines of YouView, when it arrives). If users have to use their computers to watch local TV, then there is a risk that the take-up will be limited. However, if users can view local TV programmes supplied via broadband on their domestic TV sets, in the same way as they would watch any programme, it is likely that take up will be significantly better.

7. ACS notes that capabilities are being built in respect of the London 2012 Olympic Games and welcomes the intention to apply the lessons to the Glasgow 2014 Commonwealth Games.

8. ACS has extensively discussed the proposals for the funding of a Scottish Digital Network and the Local TV initiative being pursued by the Secretary of State for Culture, Media and Sport. It has also paid special attention to the growing debate north of the border regarding a digital Scotland. It has reiterated its concern about the provision of a plurality of news services in Scotland. These are just a number of

headline issues that underscore the fact that there is no one model for the whole of the UK. In planning future strategy, it is important for this to register at all levels in Ofcom. We note that the setting up the Nations Committee has been an important step in ensuring a flow of diverse nations' perspectives to the Ofcom Board. We would simply reiterate our view that future planning should continue to be sensitive to the variety of national dimensions in the United Kingdom's communications landscape.

Ofcom Advisory Committee for Scotland
24 February 2011