

Response to Ofcom's consultation on Party Political and Referendum Broadcasts on behalf of Plaid Cymru.

I am happy for this response to be published in full.

As is noted on page 1, under section 333(1) of the Communications Act 2003, "every licensed public service television channel and every national commercial radio service must include PPBs [...] and must observe rules for such broadcasts made by Ofcom". Section 3 (point 12, page 6) refers to "includ[ing] the SNP on Channel 4, and SNP and Plaid Cymru on Five". Further Section 3 (point 17, page 7) refers to "Parties which qualify for a PEB in all three nations of England, Scotland and Wales will additionally be offered a PEB on Channel 4 (at General Elections)". I understand that Plaid Cymru does not qualify for a PEB in all three nations. As is noted elsewhere, however, Plaid Cymru has a slot on S4C. I understand that Ofcom does not have a role in regulating S4C in this connection. However, given digitalisation, it must be right that Plaid Cymru be included on Channel 4 (as one of the licensees identified by the Act) as well as S4C given that many viewers in Wales now have the option of watching either S4C or Channel 4 (assuming that S4C was once considered as being instead of Channel 4 for viewers in Wales?) and that a significant number of viewers in Wales do not receive S4C at all.

Further, given that the proposed changes determine the "nation in which [a particular election] is held" to be a material consideration, it is difficult to understand why Plaid Cymru should not be offered a PEB slot on Channel 4 given the changed landscape post-digitalisation.

Section 3 (point 17, page 7) refers to "Parties which qualify for a PEB in all three nations of England, Scotland and Wales" and then goes on to say "...and the national radio services". Given that the "national radio services" referred to are in fact Classic FM, talkSPORT and Absolute AM, these should be referred to as UK-wide services in the interest of accuracy and clarity.