

**Title:**

Mr

**Forename:**

Andy

**Surname:**

Egan

**Representing:**

Organisation

**Organisation (if applicable):**

BECTU

**Email:**

X

**What do you want Ofcom to keep confidential?:**

Keep nothing 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

**Ofcom should only publish this response after the consultation has ended:**

You may publish my response on receipt

**Comments:**

1 BECTU is the trade union for workers (other than performers and journalists) in the audiovisual and live entertainment sectors

2 We have made submissions to a number of previous media ownership consultations. In this case, we present a summary view on key consultation issues.

**Question 1: We welcome any further evidence on our assessment of the media economic landscape, including key examples of international regulatory best practice that you believe may be relevant to this review:**

**Question 2: We seek views and supporting evidence on our recommendation to remove the local radio service level ownership rules.:**

3 While noting that Government has already accepted an earlier recommendation to simplify such local ownership rules, we remain opposed to the Ofcom proposal for total removal. In contradiction to Ofcom, we do not believe that the current rules - with their attendant benefits for consumers and citizens - are disproportionate in the current climate.

4 In taking this view, we note:

- The very strong audience research evidence indicating that a overwhelming majority of adults consume and value local news from a plurality of sources.
- There is a complete lack of any strong evidence that current media ownership rules have undermined the industry's viability.
- Given the overall pressures to consolidation of ownership in the news media, there is already an excessive degree of commercial pressure undermining the localness of radio stations in the UK.

**Question 3: We seek views and supporting evidence on our recommendation that the local cross media ownership rules be liberalised.:**

5 We oppose Ofcom's proposal to liberalise the rules and believe the current rules should be retained.

6 We believe:

- That, as the consultation paper notes, People still rely on television, newspapers and radio as their main sources for local news. Therefore the reasons that Parliament put the rules in place remain.
- The current rules provide a clear regulatory framework and there is no evidence that they have in themselves hindered the development of this sector

**Question 4: We seek views and supporting evidence on our recommendation to retain the national cross media ownership rules.:**

7 We support Ofcom's recommendation to retain the current national rules on cross media ownership as opposed to removing them entirely. We remain open to argument as to whether the rules should be extended in any way.

8 We note that a plurality of national broadcasters and national newspapers are still significant sources of national news and believe that in the interests of democracy, the rules supporting such a plurality of sources should be retained.

**Question 5: We seek views and supporting evidence on our recommendation to remove the national multiplex rules.:**

**Question 6: We seek views and supporting evidence on our recommendation to retain the restrictions on broadcast licenses.:**

9 We specifically support the current restrictions as they apply to advertising agencies and to religious bodies. We further support the restrictions which promote plurality and prevents excessive concentration of ownership.

**Question 7: We seek views and supporting evidence on our recommendation to retain the appointed news provider rule. :**

10 We support Ofcom's recommendation to retain this rule in its current form as opposed to removing it entirely.

11 We note that Channel 3 continues to be a significant and popular source for national news and that ITN continues to function in the highly successful appointed news provider.

12 Especially in the current climate of uncertainty for commercial public service broadcasting in the UK, we believe it is essential that the current system requiring an appointed news provider be retained.

**Question 8: We seek views and supporting evidence on our recommendation to retain the media public interest test in its current form.:**

13 We strongly support Ofcom's recommendation to retain the current media public interest test

14 We agree with Ofcom's reference to 'the important role that the media public interest test plays as a final safeguard that can be invoked by the Secretary of State should he feel the need arising, for example, in order to protect plurality:'

15 We note that this safeguard continues to be relevant in the ongoing case concerning BSkyB's acquisition of a stake in ITVplc an issue on which we have given evidence at several successive stages.