



Media Trust response to Ofcom's discussion paper on Citizens, Communications and Convergence

1. The Media Trust welcomes the thought that has gone into the above document, and the detailed discussion about the distinct, and overlapping, sets of interests between the citizen and the consumer. We welcome Ofcom's recognition that **“furthering citizens’ interests, and ultimately, benefiting society, is likely to involve a wider range of policy interventions”**. At a time when globally our society is recognising that regulatory intervention does indeed have a protective role for citizens, and that in the world of finance, regulation had been allowed to take too much of a back seat, we would urge Ofcom to consider further intervention to support citizens’ interests in communications.
2. We believe that there should be positive action to increase the diversity of public service providers and content, and hence the range of services and points of view accessible by citizens. Diversity and plurality in the provision of public service content are crucial to stimulate greater innovation. We believe also that there is an unmet need for communications to play a greater role in increasing participation and debate; addressing social exclusion; and strengthening communities, both national and local. In summary, for communications to play a pro-active role in furthering citizens’ interests, and not just a reactive or indeed passive role.
3. Ofcom has an opportunity to work far more closely with the many not-for-profit and community organisations that operate on national, regional and local levels, that are increasingly taking advantage of communications opportunities available in content production and distribution, through digital television, online channels, mobile platforms, and partnerships with public service broadcasters (PSBs), and commercial media companies.
4. Ofcom could also be engaging in a much more strategic way with those organisations investing research capacity into citizens’ interests in media and communications, many of which are charities and not-for-profit organisations.
5. Media Trust works across a range of government departments including DCMS, Cabinet Office, DCSF and CLG. We see opportunities for Ofcom's interpretation of citizens’ interests in communications to link far more closely to the various government policy, particularly PSA 21, led by the Department of Communities and Local Government to “build more cohesive, empowered and active communities.” We find it strange that there seems to be so little joined up thinking between citizen-related

communications policy work coming from Ofcom, and priorities coming from health, social services, environment and other key parts of government.

6. The Public Service Broadcasting review is a major milestone to develop new opportunities for citizens. It offers the possibility of fostering innovation, plurality and diversity, and engaging new providers and new audiences in a rich future of information provision and exchange to the benefit of all citizens. We urge Ofcom to seize this opportunity.
7. Citizens' interests can be further served by requiring the BBC to develop in-depth partnerships with community media and community content producers at national, regional and local levels. (See Media Trust response to BBC Local proposal). In our response to Ofcom and to the BBC Trust we outline an exciting new model for the BBC to deliver against its public values and public purposes that will benefit all our communities and citizens. The BBC licence fee, which is an invaluable resource to citizens, can be used increasingly imaginatively, and in a way that will only benefit the BBC and the licence fee payers.
8. We believe strongly in the importance of the digital dividend being used at least in part to deliver social value to citizens and that there still should be modifications to the spectrum auction process to deliver this. It is our belief that relying on the auction process for disposal of all of the released spectrum is neglecting Ofcom's clear remit to ensure that the interests of citizens as well as consumers are taken into account in broadcasting policy. The auctions will only serve the market, and the market, while perhaps working for consumers, does not work for citizens without some intervention.
9. We therefore believe that Ofcom should make special provision for social value broadcasting, in addition to the current PSBs, either by setting aside some digital terrestrial spectrum for this purpose, or by requiring all successful bidders to do so, and we have suggested in previous responses to Ofcom consultations how this might work.
10. In addition, we are concerned by the unclear future offered by Ofcom's proposals to the community television sector, at both national and local levels, at a crucial point in its future. We therefore suggest that the auction process should ring-fence the spectrum likely to be used by this sector, for further urgent consideration by Ofcom.
11. There is a clear opportunity here to promote a sector that is starved of resources and poorly co-ordinated. Action should be taken now to build a vision for community television, at national, regional and local levels, and Ofcom should take a major role in realising that vision.
12. Content production is now accessible to many citizens. We would like to see more consideration given to enabling and empowering all citizens to

produce and distribute content. This would result in increased innovation, diversity and plurality of content and voice.

13. New content distribution opportunities are key. While the 'digital divide' continues, and while most UK citizens access news, information and entertainment through mainstream television channels, we would argue the need to invest more in increasing the plurality and diversity of television platforms available to citizens, ensuring universal access that does not restrict on the basis of affordability.
14. As part of media literacy interventions citizens should be enabled and resourced to distribute content as widely as possible. Online platforms are already creating exciting and far-reaching opportunities for new distribution means and channels. DTT channels that can be used by citizens for citizens are an exciting and low-cost opportunity.
15. We welcome Ofcom's recognition that "disadvantaged groups of consumers need to be protected against market failures". The same argument applies to disadvantaged citizens, particularly those with physical, learning and mental disabilities. We welcome Ofcom's support for those citizens using British Sign Language for example, and would argue that many other minority, marginalised and/or disadvantaged groups of citizens would benefit from dedicated television and broadband platforms particularly in an environment where existing public service broadcasters cannot always prioritise this content.
16. In summary, we welcome this new debate, and hope that Ofcom will invest further resource in opening up dialogue across the various sectors and interest groups concerned with citizens' interests. We look forward to taking part in further discussion and dialogue around this issue.

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See appendix for information on Media Trust and Community Channel



Media Trust

Set up in 1994 as a registered charity, Media Trust works in partnership with the media and communications industry to support the communications needs of the Third Sector – charities, voluntary and community organisations, social enterprise and citizens' interest groups.

Media Trust corporate members include: BBC, BSkyB, Channel 4, Daily Mail and General Trust, Discovery Networks Europe, Disney Channel UK, Emap Plc, Guardian Media Group, IPC Media, ITV, MTV Networks UK & Ireland, News International, Newsquest Media Group, OMD, Turner Broadcasting, Warner Bros. and WPP Group.

Media Trust delivers a range of services including training and advice, content production, content distribution, media volunteers and mentors, grant-giving and campaigns. www.mediatrust.org

Media Trust runs Community Newswire, a partnership with The Press Association, distributing 30 community news stories a day to the UK media. www.communitynewswire.org

Community Channel

Media Trust also owns and runs Community Channel, the UK digital television and broadband platform for the Third Sector, broadcasting 24 hours a day on Sky 539 and Virgin 233, and 3 hours a day on Freeview 87, and online. www.communitychannel.org

Community Channel is supported by the wider media industry. Media industry partners provide bandwidth, content and marketing. The Office of the Third Sector in the Cabinet Office provides core funding.

Community Channel Core Purposes

Community Channel is dedicated to raising awareness and inspiring its audiences into action on issues and causes that matter to them in their community and beyond.

It does this by:

- Broadcasting compelling programmes about local and global community events and the work of the charitable and voluntary sector.

- Delivering an online resource, on-air interactivity and other on-demand services offering rich and comprehensive opportunities for immediate involvement.
- Creating a thriving community on and off-air, to share ideas and experiences.
- Working in partnership with the community, voluntary and not-for-profit sector, connecting audiences with their services.
- Working in partnership with mainstream broadcasters and other media to increase its reach and impact.
- Sharing good practice and raising awareness within the Third Sector.

Its programmes:

- Feature inspirational stories that will often include a direct call to action.
- Demonstrate the benefit of either personal or community action to help improve our world.
- Celebrate all the UK's communities and their cultures.
- Be rich in the kinds of detailed content and information that other broadcasters may omit.
- Enable and empower people to tell their own stories.
- Be a mixture of new commissions, the best of mainstream television and the work of community and independent filmmaking.

Its interactive services:

- Offer depth and richness to enhance the viewing experience.
- Be a valuable and accessible resource for the voluntary sector.
- Connect users to new charitable giving and volunteering opportunities, removing barriers and increasing access.
- Offer a broadband on-demand video facility to reach analogue-only TV viewers.

Its core objectives are:

- Increase overall viewing figures.
- Increase awareness of the Channel.
- Reach a growing demographic, including majority audiences among C2DE viewers, as well as ABC1 watching at peak time.
- Extend reach to underserved audiences.
- Increase awareness of social issues amongst viewers through our programming.
- Drive up participation in volunteering, take-up of charity and voluntary sector services, and donations to charities in general.
- Increase the number of and level of involvement of charity and voluntary organisations working with us.
- Increase the level of involvement of broadcasters and wider media.

Its long-term objective is:

- To create a permanent media infrastructure for the charitable, voluntary and community sector, that with switchover will be accessible to all UK citizens 24 hours a day, across all media.