

3i) Do you agree with Ofcom's assessment that television continues to have an essential role in delivering the purposes of public service broadcasting?:

Very much so. It remains the primary medium, and still has unique power. The BBC and Channel 4 provide a range of public services which surpass any other public broadcasting system.

3ii) Do you agree that UK-originated output is fundamental to the delivery of public service broadcasting purposes?:

Yes. Without it, audiences disengage far more easily. Very few acquired programmes draw on audience loyalties the way good domestic programmes can. The degree of risk which PSB TV accepts as the norm in the UK serves a further public purpose, acting as a laboratory for the best new creative ideas.

4i) Do you agree with Ofcom's conclusions about the way that other digital channels and interactive media contribute towards the public purposes?:

Yes

5i) Do you agree with Ofcom's assessment of the implications of different economic scenarios for the UK TV market for the future prospects for delivery of the public purposes?:

Yes

5ii) Do you agree with Ofcom's analysis of the costs and benefits of PSB status?:

Yes

6i) Do you agree with Ofcom's vision for public service content?:

Yes

6ii) How important are plurality and competition for quality in delivering the purposes of public service broadcasting, and in what areas?:

Very. My own area of experience - news and current affairs - is the outstanding area. There is no question that Channel 4's performance in this area sets a benchmark which provides an outlet for stories, opinions and talent which the BBC cannot alone express or (in some cases) embrace. On the difficult issue of community relations, for example, C4 has asked far more awkward questions than the BBC, and more often. As ITV pushes meaningful current affairs (and regional news) out of its orbit, the BBC needs a challenge to complacency and to its own sense of cultural cohesion on

the vital matter of informing the public. The BBC also needs competition in other areas where risk inhibits commercial broadcasters - talent development, children, drama, comedy, new technologies and serving diverse audiences. At its centre, though, is the need for different voices. The BBC is magnificent but cannot alone represent public service in Britain. The old ITV managed to do this magnificently, but for 10 years or more, C4 has provided that plurality.

6iii) In maximising reach and impact of public service content in the future, what roles can different platforms and services play?:

TV remains the most powerful medium, and on major matters - news and current affairs, the passing-on of knowledge, entertainment, sport and drama, it will remain the dominant provider, even after switchover. New media provide real opportunities for education, diversity, for public involvement, both in interaction and in the generation of material across many genres.

6iv) Do you agree that the existing model for delivering public service broadcasting will not be sufficient to meet changing needs in future?:

There seems little doubt that C4's ability to maintain its importance will be threatened in the medium term; whilst ITV and Five will also face the inevitability of following market dictates rather than PSB priorities.

7i) What are your views of the high-level options for funding public service broadcasting in future?:

Do not believe Evolution will provide for PSB> ITV/Five have a legitimate need to compete with purely commercial rivals in the digital future. Even token PSB requirements will be hard to deliver, or honoured in the breach. The BBC alone cannot deliver appropriate plurality; C4 has the right track record, mindset and (almost) the right funding to deliver alongside the BBC. Whilst the 4th method has the right feel of democratic accountability, it is inherently a wasteful process and would mark a shift from rewarding history and expertise to the assumption that others could deliver the same from scratch. In a world in which brands will, if anything, play an even bigger role in making consumers feel secure among dizzying choices, sacrificing the reputations built up by our major PS broadcasters would be a high-risk strategy.

7ii) Are the proposed tests of effectiveness for future models for public service broadcasting the right ones?:

Very much so.

7iii) Of the four possible models for long term delivery of public service content, which, if any, do you consider the most appropriate and why? Are there any alternative models, or combination of models that could be more appropriate, and why?:

Option 3 for reasons given above.....

8i) What do you think is the appropriate public service role for Channel 4 in the short, medium and long term? What do you think of Channel 4's proposed vision?:

Channel 4 has articulated a viable and important role for itself. Where ITV once kept the BBC competitive in many ways, Channel 4 has inherited that mantle across many fronts. It's a crucible for new talent, voices and ideas, It's shown a real commitment to encouraging regional partners, like my own company, and it provides a strikingly different attitude to the Corporation.

8ii) Which of the options set out for the commercial PSBs do you favour?:

Not (1). Increasing taxation is unlikely to win the public over. Some combination of the other strategies, although I'd be reluctant to see the BBC enfeebled to protect 4.

9i) To what extent do you agree with Ofcom's assessment of the likely future long term issues as they apply to the nations, regions and localities of the UK?:

Largely right. Whilst I sympathise with ITV's difficulties, it is arguable that the difficulties they face over regionality have been in part caused by the abandonment of huge local loyalties in the rush to establish ITV as a brand in itself.

9ii) Which model(s) do you think will be most appropriate in each of the nations and in the English regions in the long term, and why?:

Production quotas make a real difference, but I have yet to see convincing proof that they will prevent the creation of short-lived "brass-plate" regional offshoots to allow the increasingly powerful London indie sector to claim fig-leaf credibility as regional providers. Keen to see all broadcasters work harder on talent retention in the nations/regions.

9iii) What are your views on short/medium-term issues referred to, including the out-of-London network production quotas?:

see above

9iv) What are your initial views on the preliminary options set out relating to ITV plc's regional news proposal? (Please note that Ofcom will put forward firm options on these issues, and consult also on ITV plc's regional news proposal, in phase 2 of this Review.):

It's hard to gainsay the financial pressures on ITV, and I'm reluctantly convinced by their arguments on greater rationalisation. I find it hard to understand why they ignore the commercial potential of establishing stronger regional identities.

10i) Do you agree with our assessment of the possible short term options available relating to children's programming:

Yes

11i) Do you agree that new legislation will need to be in place by 2011 in order to ensure continued delivery of the public purposes in the medium and long term?:

Indeed.

Comments: