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Comments on OFCOM's Second Public Service Broadcasting Review

In your foreword, you say that 'this review is being conducted through the prism of audience needs'. As a member of that audience and a British citizen I wish to make the following observations on your Review.

Before commenting on the Review's findings, I think it important that we all understand the true meaning of these three words - 'public', 'service', 'broadcasting'.

1) **PUBLIC** - means 'open to and shared by all people'. Whatever is public, obviously has to be set up, maintained and paid for by every citizen in the country - either through local or national taxation or, in the case of UK public service broadcasting (PSB), by the licence fee, advertising revenues and other subsidies. Like public libraries, public footpaths, public swimming pools etc, which are freely available for all citizens to use and enjoy if they so wish, so has PSB been available to all for the past 60 years. Ultimately, it is the wide public support, acceptance and ownership of such services that ensures their continuance for the public good. They belong to the public, not the state, and are accountable to the public.

2) **SERVICE** - means 'the act of helping or doing work for another person or the community at large'. In so doing, this creates a fairer, more open and democratic society. I think PSB largely fulfils this role.

3) **BROADCASTING** - breaking down this word into 'Broad' and 'Casting' gives it its true meaning, ie transmitting a broad range of programmes and information to the public at large.

4) **PUBLIC SERVICE BROADCASTING** - overall, I agree with the various statements in this Review of what the characteristics of PSB should be: to inform, educate and entertain; to reflect cultural identity; and to make us aware of different cultures and viewpoints. So all the following should be included in a broad-based and mixed schedule of programmes on PSB networks: News (including international nations and regional), Current affairs, Entertainment, Sport, Factual/Documentaries, Education, Drama, Films, Children's, Arts (including music), Science.

As David Attenborough wisely said: 'PSB allows a whole society to see itself and talk to itself, and every citizen can share insights and illuminations, and become aware of problems and collectively consider solutions.'

5) **RADIO** - has been excluded from this Review, and this represents a serious flaw in this PSB Review. Both the BBC and commercial broadcasters spend a sizeable proportion of their revenue on radio PSB, and not to take them into account in this review means the PSB jigsaw is not complete and future policy cannot be made without their inclusion.

6) **GLOBAL REPUTATION OF BRITISH BROADCASTING** - throughout the world, British broadcasting is envied and valued, and the BBC in particular is viewed as the world's leading quality broadcaster. In an increasingly uncertain world (climate change, terrorism, scarcity of finite resources), it is essential that PSB is strengthened, supported and protected. The unregulated British press cannot, in many cases, be relied upon to keep citizens fully and accurately informed of what is going on around them. This means Public Service Broadcasters need to fill that gap in a democratic society.

7) OFCOM'S AND THE BRITISH PUBLIC'S VIEW OF PSB - as outlined in this Review, OFCOM says that, overall, the present PSB channels are achieving their public service purposes, and viewing of the main five terrestrial channels accounts for over 60% of total viewing.

As far as the viewing public are concerned, most think they are benefiting from public service content being made widely and freely available. They like the idea of mixed scheduling on PSB channels which makes it possible to stumble across programmes that subsequently translate into an interest. Audiences appreciate and want a plurality/choice of PSB channels but, if pushed, would be prepared to pay extra (£20 figure mentioned in the Review) in order to maintain that choice of channels which offer a wide spectrum of programmes to suit most tastes and interests. Most viewers of PSB channels tend to have strong channel loyalties and confine their viewing to mainly two or three established networks. So it would seem to be a myth that audiences are wanting a limitless choice of channels in the future.

According to the Review, the kinds of programmes that fewest people thought needed to be shown on main PSB channels in the future were those catering for niche interests. I agree.

8) 16- TO 24-YEAR-OLDS' VIEWING HABITS - OFCOM's research shows that among this age group Internet use is increasingly popular and often used in preference to watching TV. Anecdotal evidence also points in this direction, particularly when it comes to activities related to study and sport and, to a lesser extent, news and entertainment. I think this may have something to do with this age group's preference for privacy and the need to find out things for themselves without the interference of adults. It is difficult to forecast whether such a preference will stay with young people as they get older, or whether they will revert to more television viewing as they approach their 30s and 40s. In any case, it is important that public service content on the Internet maintains high standards, and is impartial and well funded.

9) PROBLEMS AHEAD FOR COMMERCIAL PUBLIC SERVICE BROADCASTING - as digital switchover takes place and is completed by 2012, the commercial channels, particularly ITV1 and Ch4, are going to find difficulty in funding and fulfilling various public service roles. Particularly at risk are regional and nations' (Wales, Scotland, Northern Ireland) news and children's programmes. As far as I can judge, one of the main reasons for this shortfall in funding is increasing competition for a finite amount of advertising revenue, brought about by the Communications Act 2003 which opened up the broadcasting market.

At present, 90% of programmes originating in the UK are broadcast by the five main channels and therefore this provides employment for a large pool of creative talent in the UK. But as finances become tighter for commercial PS Broadcasters they may well have to cut their UK-originated programme-making, unless additional funds can be found.

If we allow ITV1, Ch4 and Five to gradually give up their PSB activities, then the BBC will have no one to compete with, and this is not a situation the British public would accept. It would lead to a fragmentation of PSB, a move towards pay-as-you-view television, and the possible domination of non-BBC broadcasting in the hands of foreign media magnates like Rupert Murdoch and Silvio Berlusconi (and all that they stand for).

As has already been mentioned in Section 7 above, the overwhelming majority of UK citizens are happy with the five main terrestrial channels, enjoy their wide range of quality programming and trust their output - particularly in news and current affairs.

10) SOLUTIONS TO COMMERCIAL PS BROADCASTERS' PROBLEMS - having thoroughly read and re-read OFCOM's four suggested solutions, I think the only one that will ensure the long-term future of PSB is Model 1 - Evolution. The other three suggested solutions, in my view, would

seriously damage both the commercial channels it is trying to help and the BBC. PSB would as a result become a shadow of its former self, and the market/law of the jungle would gradually take over and we, the British public, would be the poorer for such an outcome (both in monetary and social cohesiveness terms).

We are the fourth richest nation in the world and the envy of the world in broadcasting terms. Surely a solution to the funding problem of the present commercial PS Broadcasters can be found. The public obviously wants a sensible solution, and it is up to the Government to facilitate a solution which takes account of our long and distinguished reputation for quality PSB, and which also takes a long-term view of the important role PSB plays in our democracy.

I do not feel qualified to comment in detail on where the funding for supporting the existing commercial PSB should come from. However, one source does occur to me, and it is contained in a letter I received from the DCMS in January this year. It states that 'the (analogue) spectrum released by digital switchover should generate value to consumers and citizens to the tune of £5-10 billion over the next twenty years.' It was the Government's, not the broadcasters', decision to replace the analogue signal by a digital signal and therefore it only seems right that the proceeds of the analogue spectrum sale should be ploughed back into PSB and not into the Government's coffers.

11) BBC'S FUTURE IN DIGITAL PSB - it is clear that the vast majority of British people is in favour of a strong, well-funded and independent BBC and this is strongly confirmed in OFCOM's Review which described the BBC as the most trusted of PS Broadcasters, and on no less than ten occasions throughout the Review described the BBC as 'the cornerstone of Public Service Broadcasting'.*

With that level of endorsement by both the public and OFCOM it would seem to be pure folly to top-slice the licence fee in any way, or to force the BBC to bid for extra funds to carry out its PSB functions to some newly set-up funding agency. Nothing would damage the BBC more than to follow this route. Due to a lower than expected licence fee settlement recently, the BBC is already having to shed almost 10% of its workforce, and this is causing great anxiety and upset across the Corporation. Added to this, we, the viewing public will have seen £800 million taken out of the BBC's income (licence payers' money) over the next four years to pay for digital switchover) - money which, in my view, should have been provided by the Treasury, as it was a Government decision to go digital.

If, as has been proved over and over again, the BBC is a much valued institution, why is it being constantly threatened, parts of it sold off, some of its core functions contracted out and many of its staff on short-term contracts? If this trend continues, the BBC will go the way of other public services and be passed over to the private sector. From first-hand knowledge - and I should add I have never worked in broadcasting - I know just how disillusioned, angry and upset many BBC staff feel about their future career prospects in the Corporation. How can creative and talented staff work in such a threatening atmosphere? One only needs to read the letters page of the BBC's staff magazine 'Ariel' to gauge the anxieties of many of its staff.

* *'BBC is the cornerstone of PSB' (or similar) is mentioned in the following sections of the Review: 1.9; 1.15; 1.40; 2.6 (ii); 2.9; 3.65; 7.6; 7.35; 8.2; 10.10.*

12) OTHER POSSIBILITIES AND COMMENTS - besides top-slicing, I notice in this Review that OFCOM is suggesting that other commercial, non-PS Broadcasters could be brought into the PSB fold and that newspapers could also be allowed to bid for some PSB contracts. The trouble - and the danger - with allowing such entrants to PSB is the track-record of some of their proprietors, and the often malign and insidious influence they have most certainly had on the media both in this

country and abroad. Some of their biased and trivial coverage of local, national and international news over a long period of time makes them unfit to take on a public service role. Balance, impartiality and high-quality broadcasting would be at risk, casualisation of staff would be likely to increase, and trust in PSB would plummet. And we, the viewers, would very likely be left with a multiplicity of niche programmes, many of which would be made abroad, and so would not reflect our culture - and may not be worth watching either.

I think that ways must be found to support our present PS commercial broadcasters. They have a long and creditable record of operating successful TV networks in this country, and British citizens and the British way of life would be much the poorer if these experienced and dedicated people were squeezed out of PSB by foreign media magnates. One only has to look at television in the USA to appreciate how news, for instance, can be manipulated.

OFCOM'S comment in Section 7.51 of the Review states that 'some commentators believe that public purposes can be delivered effectively by fully commercial providers'. It would be interesting to know who these anonymous commentators are, and who the anonymous commercial providers are also. Without this information it is not possible to put their theories to the test and for the public to examine their reasons for such a view.

13) **FINALLY** - I think it pertinent to ask the question: What is the background and previous experience of the authors of this OFCOM Review? Without this information it is difficult to put their recommendations into context.

16th June, 2008