

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

Yes

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

Yes

**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?:**

Might understate the advantages of EPG listing

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

Mainly

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

Plurality can be too much of a good thing! 2 is competition 200 is fragmentation of audience and therefore of revenue base in the commercial sector. Too many stations has very nearly ruined commercial radio, and ITV's problems are exacerbated by the addition of 200 digital services in the last 5 years

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

BBC has a key role and is insulated from the adverse effects of fragmentation in financial terms, though not of course in audience share.

A viable PSB ITV is crucial na to a slightly lesser extent Ch 4.  
Ch 5 is of less importance.

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

Yes

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

OFCOM have delivered a wake-up call to all involved in broadcasting in listing 4 options for ITV, 3 of which involve it ceasing to be a PSB! More attention needs to be given to enabling ITV to survive as a PSB, by removing unnecessary constraints e.g. on advertising minuteage. ITV companies should also be regarded as Independent Producers for other networks, and in the case of STV for ITV itself The CRR needs to be reviewed/scrapped as a matter of urgency(though I recognise that this is not in the gift of OFCOM)

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

As far as they can be!

**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?:**

I suggest that Model 1 is the only one which parliament and the public will accept, and I would guess that the maintenance of regional news - though not with the current coverage areas-will also be demanded. the key is to align ITV's interest with the public good. I believe that regional news can be a flagship for ITV, and the disparity of audience shares across the various regions would repay investigation. Other sources of funding should be explored. If film is a legitimate recipient of Lottery funding, why not films made for TV, or series which are film in genre. TV is simply another outlet.

**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?:**

Probably the Public service Publisher role would sit best with Ch4

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

See 7 above. OfCom should as a matter of urgency review the current constraints and remove those which are not absolutely necessary. the tapering levy should also go now; not of great financial significance, but it does send the right signal. If it is correct that a production does not count towards the out-of-London quota if the company has a small office in Soho -as ITV allege- the definition should be changed to a more sensible one.

**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?:**

Scotland, Wales and Northern Ireland face additional programme costs meeting the (increasing) aspirations of the nations they serve. They are also most at risk from the loss of the ITV 'subsidy'. they deserve priority attention, particularly as a well funded BBC has been able to improve its service. Being regarded as independent producers would be a good example of aligning public and private interest. The funding of Gaelic or Welsh programming should not fall on the companies

**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?:**

See above

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

See 8ii

**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.):**

I don't know enough about each region of England to comment in detail on ITV's proposals. My approach would be to try to give ITV the chance to make regional news its flagship and then to leave the decision on areas to be covered to them, since it will be in their interest to opt for areas which meet audience expectations

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

It may be heresy, but I feel that sometimes too much emphasis is put on UK origination.

**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?:**

I think it is clear that we may not have as long as that. Action is required more urgently

**Comments:**

My career has been in STV, Radio Clyde, and SRH, and I would concede that that is bound to colour my view on the importance of local news, and my belief that, if well done, it is also profitable. Surveying the state of radio at the moment, it reinforces the view that it is possible to have too many stations or channels, and that OFCOM should be conscious of the effect on the existing marketplace of licensing further services.

I am happy to expand on any of my observations, but thought it would be more helpful to stick to your questionnaire format.