

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

3.1 With the decline in TV viewing habits nowhere near as marked as was first feared at the beginning of this century (a decline of only 2.7% over the last 5 years) and the main five public service channels still commanding nearly two thirds of all television viewing, clearly television and in particular the main public service broadcasters continue to be the main carriers of public service purpose in broadcasting in the UK.

3.2 It is an imperative that Ofcom, in a move away from 'light-touch' regulation in this matter seeks to protect this unique PSB quality in British Broadcasting life - a socially cohering imperative as we move towards the uncertainties of the digital age.

3.3 But beyond this Ofcom should consider the meaning and influence of PSB culturally, politically and economically for the whole of the UK. That the benefits of PSB is shared and experienced equitably into every corner of every Nation and Region. This last point is the underpinning principle and message in my contribution to this Second Ofcom Public Service Broadcasting Review.

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

(Note: In section 9 I shall return to the issues contained in the submission below)

3.4 My view concurs with Ofcom's, that UK originated programming is and will continue to be the backbone of PSB delivery in the UK. Audiences in the UK have historically had access to high levels of programming made in the UK, reflecting the particular UK values, cultures and perspectives?.

3.5 On a closer examination of the four purposes of public service broadcasting as identified by Ofcom however, the main PSB broadcasters have signally failed the Nation of Northern Ireland, particularly in regard to Purpose 3 'cultural identity': 'the essential purpose of content to reflect national and regional identity as can only be featured in programming originated in the UK.

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

**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?:**

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

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

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

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

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

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

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

**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?:**

**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?:**

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

**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?:**

9.1 For the citizens, television producers, licence fee payers and general television consumers, UK broadcasting is a 'cold house' for the people of Northern Ireland. Statistical report after report has underlined this view, yet neither the main PSB broadcasters nor a historically 'light touch' regulatory tier, both of which have the capacity in their strategies to effect real change and difference in this matter, have to date chosen not to do so.

9.2 2008 is to be the year that makes the difference in British Broadcasting. Notwithstanding the current two phase Ofcom PSB Review, both the BBC and Channel4 generated high hopes by far reaching internal 'PSB soul-searching'.

In late 2007 both of these key PSB broadcasters launched internal reviews, - the Caroline Thomson 'BBC Network Supply Review' and the Channel4

?Underperformance in the Nations? internal report commissioned in the run up to it?s ?Next on Four? PSP future strategy launch. These were genuine and largely welcomed initiatives by the PSB broadcasters to re-examine the core values and move to address the issues of under-delivery that were highlighted by the processes.

These reviews were further informed by the crucial parallel activities of the Scottish Broadcasting Commission (ongoing) and the Out of London report (2007/08) commissioned by the Producers Alliance for Cinema and Television (PACT). In each of these circumstances the clear message is that, regardless of their funding model the PSB broadcasters had obligations and responsibilities to ?reflect all national and regional identities of the UK? and to deliver equitably and with conviction on the universally accepted Out of London/ Nations and Regions production quotas and targets.

2.5 The PACT statistics however tell us that the previous failure to deliver on this obligation has continued into 2007. That the imperative for Northern Ireland (while Ofcom and the PSB broadcasters are in the process of resolving for the foreseeable future their place in the PSB landscape) is that it demands parity of treatment and esteem in this crucial national conversation.

The PACT statistics are startling and far-reaching in their meaning. The total value of network output from Northern Ireland in 2007 was just 0.1% of total network spend. The population of Northern Ireland is just under 3.0% of the UK total. This is a 30-fold disparity. If the principle underlined by the Scottish Broadcasting Commission (and acknowledged by the BBC) that output from any given Nation should broadly be in line with population levels, then this is an indefensible reality in British broadcasting life.

The levels of BBC network output from Northern Ireland across all their channels are far below what they should be in the context of the stated ambition of 17% equitable output from the Nations, and much worse than they previously acknowledged (only finally accepting the more credible Ofcom definition of Out of London production in 2008). BBC2 commissioned no programmes from Northern Ireland in 2006. Channel4?s commissioning from Northern Ireland has over recent years been so low that it is barely measurable. ITV1 commissioned nothing from Northern Ireland in 2007 and FIVE commissioned nothing from Northern Ireland in 2005, 2006 and 2007.

9.3 At the time of writing (June 2008) we are at the half way point in the year of ?difference?, and for broadcasting and Northern Ireland the potential outcomes generate excitement and anxiety in equal measure.

While welcoming the BBC Trusts genuine engagement on these matters and in particular it?s overseeing of the Network Output Review, the Trust?s most recent press statement on the matter has indeed declared that.. ?The BBC exists because of the contribution of licence fee payers right across the United Kingdom, and so we have a duty to reflect the whole of the country? and continued ?we have approved a strategy that signals the start of some big changes to increase the volume of network television production across Scotland, Wales and Northern Ireland?.

And yet it has been noted with consternation that in acknowledging the overall 17%

from the nations goal, the Trust has declared that:

- (i) there will be no formal targets for individual nations and
- (ii) there will be an eight year timetable to 2016 to deliver on the 17% ambition

The recent history of broadcasting in the UK tells us that without individual nations' quotas the 'market' will default to the detriment of Northern Ireland. Compounding this, an over long eight year delivery schedule could lead to a grinding and crippling outcome from which this region's creative industries may not recover.

This is the ultimate challenge for the BBC Trust on this issue. Whether or not it acknowledges and intervenes as a matter of principle on behalf of Northern Ireland for the good of broadcasting in the UK. And whether or not it follows through with conviction on its Charter promise to 'further deepen its commitment to the nations.. to spend the licence fee more equitably .. (and crucially) to stimulate local creative economies'.

9.4 In doing this it would copper-fasten and build on the exemplary PSB delivery by BBC Northern Ireland at the local level. This is a success that goes un-rewarded at a network level, as BBC Northern Ireland like those network focused independent production companies in the region has had its significant investment in network ambition rebuffed by a centralised (and metro centric) commissioning power structure.

9.5 What requires further consideration here is the corollary between production and on-screen regional representation in the context of purposes 3&4 of the Ofcom articulated key PSB purposes: Reflecting UK cultural identity and Representing diversity and alternative viewpoints. In a post-conflict Northern Ireland seeking to re-build, re-invent and regenerate, it hardly needs re-stated that the challenge and opportunity for the BBC to make a difference as the key PSB entity in the UK, is indeed profound.

9.6 This is further under-lined by Ofcom's own audience research that tells us that the people of the Northern Ireland region rate (by a long stretch) higher than any other the importance of portraying nations and regions well to the rest of the UK. The irony cannot be lost on Ofcom with Northern Ireland almost nowhere to be seen on the screens of the main UK broadcasters.

9.7 Channel 4's challenge is no less profound, if of a different scale and order. The Channel's welcomed intervention with 4IP in the on-line provision of public service purpose is typically visionary and characteristic of the Channel's ability to re-invent itself for a future PSB multi-platform age. It is to be welcomed too that this is being driven by the Channel as a Nations and Regions initiative.

The real and present challenge for Channel 4 however continues to be in its status and obligation as the second most important television Public Service Broadcaster, re-stated and freshly celebrated in its 'Next on 4' strategy launch this year. What was concerning from a Northern Irish point of view was the 'double-edge sword' potential in its largely laudable drive to 'double the Channel's output from the nations'.

Critically, from such an already low base the impact of a doubling of output from Northern Ireland would have little or no impact. The suggestion might be that through a little careful wording Channel 4 has side-stepped a meaningful intervention in the Northern Irish sector and in doing so de-valued one aspect of its claim to be the only real risk taking national PSB broadcaster.