

Public Service Broadcasting Review 2008

A response to Ofcom from mediawatch-uk

We welcome Ofcom's timely review of Public Service Broadcasting believing that it is good that broadcasting output is considered in this way. It is especially necessary as the Broadcasting environment has changed so radically in a relatively short time. We are not sure, however, if suggesting that broadcasting is "at the crossroads" is somewhat over-dramatic.

We are aware that advertising revenue is migrating to the Internet and that this is making life difficult for commercial TV channels. We can appreciate the argument that PSB programmes are not where most revenue is to be made from advertising or sponsorship and it is sensible to look elsewhere for adequate funding.

It is not demonstrated, in our opinion, that audiences are "increasingly taking advantage of new digital media to access 'public service' content." So far as Freeview is concerned too many programme channels are devoted to repeats, selling goods or pop music. These digital channels simply do not meet the 'public service' criteria set out by Ofcom in this Review.

It is Ofcom's supposition that "a new and sustainable model for 'public service' broadcasting is needed" but not all avenues of income have been explored as we suggest below. We wonder if Ofcom is really seeking "a new sustainable model" for itself as it is currently funded by revenue from those it is supposed to regulate – and they are finding their declining income streams being steadily stretched.

It is not surprising that audiences "want content that reflects life in the UK". It is understandable that people feel this because of the high percentage of programmes shown on British TV that are made in the US and reflect an American "cultural identity" rather than a British one. This is not the same as "increasing our understanding of the world" which increasingly is becoming little more than a romantic illusion as most entertainment now has a global identity as international media markets have expanded. In our opinion Ofcom must face up to the truth that commercial television, whether 'public service' or not, is primarily a money

making enterprise, calculated to deliver audiences to advertisers and aimed at satisfying investors and shareholders. Viewers' interests are not the highest of their priorities. This, we believe, is well illustrated, for example, by the willingness of ITV to abandon the making of original programming for children because of the restrictions now placed by the EU, the Government and Ofcom on the advertising of unhealthy foodstuffs in and around children's programmes. Where is the 'public service' here?

Whilst we welcome Ofcom's creative thinking with regard to the funding of PSB programming in the commercial sector we believe it has failed to recognise the limits of available funding from traditional sources. We are aware that advertising revenue is steadily migrating to the Internet because this provides the perfect means by which people can be targeted directly and returns are, therefore, greater.

It is, of course, true that the Internet enables viewing of some programmes "when you want" and it was on this slogan that this development was proclaimed, notably by broadcasters themselves. Accordingly, this migration to the Internet is, in part, due to broadcasters making their programmes available for viewing and downloading in order to remain competitive with other providers and to take advantage of the take-up of personal computers and broadband.

There is an assumption in the consultation document, which is not borne out in practice, that programme standards improve as a result of competition. This is a fallacy of the highest order with regard to programme content and Ofcom really must provide substantive evidence that this is so. We recall that Lord Hattersley publicly expressed the view, in May 2004, that the opposite had, in fact, happened:

"The liberation, which I so welcomed 40 years ago, has not had the effect for which I hoped. Foolishly, I believed that broadcasters, acting with little or no restraint, would produce an ever-improving quality of programme. The reverse has happened. Television, in particular, has plunged so far down market that, week after week, I assume we have reached the nadir. Then a programme plumbs ever-greater depths. It seems that television can continue to degenerate indefinitely ..."

"One of the hard facts of television's decline – a painful fact to swallow for unapologetic libertarians – is that liberty, far from

producing an improvement in quality, has produced a continual deterioration in standards. Why go to the trouble and expense of producing first class shows when there is a fortune to be made from rubbish – as long as it is associated with sex and violence? Notoriety increasingly takes the place of quality and forces the quality of broadcasting down, down, down.”

We believe that this is a view shared by many people. Indeed Ofcom’s own research, set out in its Communications Market reports, has found that the majority believe there is too much violence and bad language on television. The *Radio Times* conducted a ‘taste and decency’ poll in May 2008, which showed even higher levels of dissatisfaction than Ofcom’s research. **It does seem to us, based on the evidence of opinion polls and our experience, that Ofcom is not responding to expressions of public concern despite being charged by Parliament to apply “generally accepted standards” to the content of television and radio services.**

mediawatch-uk readily acknowledges that “the way audiences watch and access television programmes has changed dramatically” for some people. It is overstating the case to suggest that everyone’s viewing habits have changed. Many people simply want to “watch the telly” and continue to do so in the traditional way. The latest television sets, with built in Freeview, enable people to select and view channels in the traditional way using the remote control. The choice of TV and Radio channels has vastly increased but the switch to digital has not brought increased choice of programme styles or genres. Many channels are dedicated to the showing of repeats or selling goods and others are little more than perpetual “chat” shows giving the travelling circus of celebrities a platform to sell their books, records and publicise their films and plays. The much talked about “digital dividend” has yet to be realised. **It is our belief that most of the new original programming in the commercial sector, ‘public service’ or not, would probably have been made anyway and does not owe its commission and transmission simply to the new digital environment.**

Broadband take-up has been rapid and this has clearly had some impact on viewing habits providing, as it does, the capability to view ‘what you want, when you want’ through the iPlayer and 4oD and the latest generation of mobile phones. **We do not doubt that this is a very welcome innovation for many people but the**

Government really must extend Ofcom's regulatory oversight to downloaded programmes that would normally be subject to its jurisdiction. In this environment the 'watershed' is meaningless and something must be done to strengthen this basic regulatory mechanism that, although very far from perfect or adequate, is well understood by the public. We are aware of voluntary agreements in this regard but experience suggests that these are less than satisfactory.

We are also aware that there has been a migration of younger people away from 'public service' channels, presumably, to commercial pop music and other channels that are on offer. But young people have also deserted television in general in favour of the Internet, computer games and social network websites. Accordingly, there is now much less loyalty to traditional broadcasters than was evident in previous generations. The BBC is to be commended for having the foresight to move into the online world at a time when other broadcasters were focusing on their revenue shortfalls.

Declining audiences and share are now the rule rather than the exception and there is a corresponding decline in investment in unprofitable services. The fact is that 'public service' programming is less and less what the people want. It is not without relevance to restate the ancient Roman metaphor that all some people are interested in now is "bread and circuses". Having been given this for so long, any 'public service' content must seem an unattractive proposition!

Is it any wonder that there are such low aspirations and expectations when Channel 4 – a 'public service' broadcaster – clears its schedules every year for *Big Brother* and *Celebrity Big Brother* and derives around 15 per cent of its annual income from these "reality" programmes? If this is what the people want – determined by audience ratings and aided by the advanced and intensive brand publicity – they will not want high quality, expensively produced programming with a 'public service' tag.

If broadcasters shape taste we clearly have a long way to go before people will be so educated and informed that they will want 'public service' programming of the sort set out in this consultation document. If commercial broadcasters feed their audiences with junk television this is all they will expect and want.

It is good that Ofcom has a new vision for PSB and we believe that the five main goals are already being achieved, to a great extent, by the BBC. Since the independent sector is not achieving these goals we wonder if Ofcom envisages an entirely new broadcaster to compete directly with the BBC. This poses the crucial question of where all the new content made in the UK is actually going to come from and where the necessary investment is to be derived.

With regard to ways to fund PSB we believe that it is not appropriate for the commercial channels to be in receipt of ANY licence fee funding. Commercial television is just that and those who occupy the territory have to accept the risks. We wonder if they would offer to subsidise the BBC if there was ever an over-abundance of advertising or sponsorship revenue.

We can see no good reason why some funding for commercial television could not come from the proceeds of the National Lottery. We simply cannot understand why Ofcom does not consider this as an option and set it out for public discussion. Practically every household in the land has television and so subsidy from this source would benefit everyone. Whereas all licence fee payers would lose out if their money were distributed to the commercial sector. Moreover, there would be a loss of accountability and we can foresee that demands for more and more money would become routine once the principle were to be established. In the past huge sums of Lottery money have been given to “good causes” that benefit only a relatively few people. If the National Lottery can be harnessed to fund, in part, the Olympic Games why not commercial broadcasting too?

We believe that the time has come to create a “Lottery Broadcasting Fund” where money could accumulate over time and commercial broadcasters and independent companies could bid for money through a board of trustees who would make grants to those with the best programme ideas. This could work as a kind of sorting office ensuring that only the best programmes, that meet Ofcom’s ‘public service’ criteria, qualify for this funding. Such a mechanism could, if properly managed, begin to drive up standards.

In this way the commercial sector would be content, the BBC would be content and, above all, the viewers would be content because it would cost them nothing directly and programmes might improve as well!

We are particularly pleased that the Secretary of State has recently expressed concern about standards:

“Standards are what have kept British broadcasting valued, celebrated and trusted in the UK and around the world ... People, both at home and abroad, look to British programming because they understand that it is produced to high standards, meaning they know they can trust what they are seeing and hearing. Lower standards and you lose the trust and the public support that goes with it. Lose trust and you lower the quality, you lose innovation, you lose the ability of programme makers to take risks, you lose new possibilities, new talent goes undiscovered, and high quality programming is compromised.”

We believe that it is not enough for this PSB review to limit consideration to differing models of funding. There are also unresolved issues related to offensive and harmful content. On the basis of the PSB purposes, set out in the consultation document, it is hard to see how much of the programming currently available on commercial channels fits these noble descriptions. The truth is that the standards generally accepted by Ofcom are clearly out of step with public expectations and this, as well as funding, needs to be addressed – and urgently!

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NB: We have no objection to the whole of this submission being made public and we have no objection to it being attributed in its entirety to mediawatch-uk.

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