

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 television should continue to have an essential role in delivering the purposes of public service broadcasting. The role that community television can play in the delivering of public service broadcasting to communities needs to be recognised. It also needs to be recognised however that radio also has an centrally important role in this regard especially the newly founded community stations many of whom have developed deep roots in the various communities which constitute the 'public'. The definition of public service broadcasting needs to be clear that the 'public' is not monolithic, monocultural or monoglot and that public service broadcasting needs to respond to the diverse needs of this diverse public, and this should include public service broadcasting in the various languages used by the public, including the minority indigenous languages. In the case of northern Ireland this must include a proper full Irish language radio and television service for the whole of the region. An Irish language radio service could be most easily be provided by the extension of the existing service provided in Belfast by the Irish language community station Raidió Fáilte to cover the whole of the north.

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

Yes in order to properly serve the communities who constitute the 'public', particularly indigenous language communities, a major proportion of the service needs to be locally originated.

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

The ways in which the public receives information is changing rapidly but the continuing importance of radio as a source of this information needs to be recognised. It is still for example the most widely available provider of public service information for the millions of car drivers. The issue of ensuring that this type of listener can avail of digital services in their vehicles needs to be addressed in parallel with the roll out of digital radio services. The importance of community stations and the role that they can play in disseminating locally relevant public information needs to be recognised. The possibility and importance of language specific public service broadcasting aimed at particular language community is something that is particularly suited to the community radio sector. Ensuring that the audiovisual media and audio media both digital and otherwise understand the importance of providing proper services to minority language communities, particularly indigenous minority languages, is a challenge must be met in future public service broadcasting. In the north of Ireland broadcasters, with the exception of the Irish language community radio service provided in Belfast by Raidió Fáilte, broadcasters have failed to meet this challenge for public service broadcasting.

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?:

The provision of public service broadcasting should not be profit driven. It should be the responsibility of all licensed broadcasters to provide public service broadcasting with, where appropriate, support from public funds. Public funding should be contingent on the provision of a public broadcast service which serves all communities, including minority language communities and especially minority indigenous language communities.

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

Public service broadcasting needs to be adequately funded from public funds. The issue of adequate public funding is particularly relevant in the community broadcast sector where because of community input, community centred public broadcast service is provided, at much less cost than by many other broadcasters. This service needs to be recognised and supported by proper funding.

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

The necessity of reflecting the views of, and catering for the needs of communities sometimes seen as 'different', including linguistic, cultural and ethnic communities is of particular importance in the realm of public service broadcasting. It requires that broadcasters give access to these communities to allow them a role in setting the agenda as to what is public broadcasting in their circumstance. This applies to language communities, to new immigrant communities and also importantly to indigenous language communities. Public service broadcasters need to recognise the importance of the broadcast media with regard to indigenous language communities. In the situation in the north of Ireland the public service broadcast service to the Irish language community is severely lacking in terms of hours of broadcast material. The community radio station Raidió Fáilte has in a period of little over two years provided more Irish language broadcasting, much of it public service broadcasting, than all the other broadcasters in the north of Ireland put together since broadcasting began in the area. This service is however currently only available on the airwaves in the Belfast area. The service needs to be made available throughout the whole of Northern Ireland. In the interests of providing a public broadcast service to the Irish language community throughout the northern Ireland region, issues of licensing and adequate funding to allow Irish speakers throughout the whole of the region to avail of and to participate in the Irish language community service provided by Raidió Fáilte needs to be addressed.

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

Plurality is important in delivering public service broadcasting. However plurality does not consist only of several services reporting the same event, important as this

can be in allowing people to assess what is being reported. Rather than pointing multiple cameras and microphones at the same event, plurality can better be achieved by making numbers of those cameras and microphones available to the various communities which make up the plurality of society and providing opportunities to hear a plurality of viewpoints from a plurality of communities. This is a role which is suited to the community radio and television sector and these services need to be properly recognised and funded. Plurality also requires that the plurality of languages represented in a community are also represented in public service broadcast. In the northern Ireland region this plurality requires that the Irish language community is properly served and a reasonable first step in this direction would be the extension of the Irish language community radio service Raidió Fáilte to cover the whole of the region. It also requires that the Irish language Broadcast fund be properly resourced on a long term basis and that part of this funding be allocated to the production of Irish language radio.

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

Again the importance of radio needs to be recognised as an important platform which will continue to exist, in however changed a format, alongside the new service platforms. The importance of the community radio sector, often lauded by government spokespersons is shamefully under-funded. The current provision of £500,000 to fund the sector with over 100 stations is grossly inadequate. Recognition needs to be given to the unique role that the community radio and television sector can play in providing cost-effective public service broadcasting, given their often unique contact with, relevance to and involvement in the communities they serve, and this recognition needs to be backed up by proper funding.

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

Given the increasingly diverse cultural, ethnic and linguistic society in which we live public service broadcasting needs to allow access and participation by these diverse groups in the provision of relevant public service broadcasting. In the Northern Ireland situation the existing model has proven itself insufficient in this regard. One notable exception to this has been provided by the community Irish language radio station Raidió Fáilte in the Belfast area. This model properly resourced and funded could go a long way towards providing a public broadcast service to diverse cultural ethnic and linguistic groups.

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

Society has a right to a fair public broadcast service which properly reflects and is accessible by the diverse ethnic, cultural and linguistic and other sections in society. Public funding should be available to ensure the proper and adequate provision of such a service made available through tax and/or licence fees. Public funding of public service broadcasting by the various broadcast sectors. Public funding should be contingent on the provision of a public broadcast service which serves all

communities, including minority language communities and especially minority indigenous language communities.

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

In terms of reach, impact and plurality a test of how the interests of minority communities are covered is necessary, whether these communities are defined in terms of ethnicity, culture, language or other characteristic. This test should involve ensuring that these groups have access to public service broadcasting particularly, but not exclusively, as it pertains to their particular interest.

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?:

All licensed broadcasters should be required to provide a public service broadcast service. This service should reflect the linguistic, cultural and ethnic identities represented in the target area. There should be appropriate access to public funds to provide this service contingent on the provision of a public broadcast service which serves all communities, including minority language communities and especially minority indigenous language communities.

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?:

While Channel 4 has in the past provided an interesting counterpoint to other broadcast media this role has become eroded. Its London-centric view (which is not unique to Channel 4) has no doubt contributed to this. As with the other London-centric 'national' broadcasters, proper public broadcasting requires a proper engagement with the diverse ethnic, linguistic and cultural groups in the area that it covers.

The commitment in the proposed Channel 4 vision to increase its level of commissioning in the 'regions' and to use more independent producers could prove to be a positive step. But one important test of this vision in the north of Ireland will be how it provides a service to the Irish language community which up until now has received practically no provision from the Independent television sector and Channel 4.

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

All licensed broadcasters should have a public service broadcast remit. This service should reflect the linguistic, cultural and ethnic identities represented in the target area. There should be appropriate access to public funds to provide this service which should be allocated according to the financial circumstances and the level of service being provided.

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?:

The recognition of the significance of local and community radio stations is to be welcomed as is the acknowledgement of their important contribution in terms of their ability to contribute different voices and perspectives and to support plurality. This recognition needs to be accompanied with a commitment to properly fund the community radio sector. The current funding of this growing and important sector to the tune of £500,000 (less than £5,000) per station is grossly inadequate, and must be upgraded significantly. The continued existence of a number of radio stations in the community sector is being endangered due to the gross under-funding of the sector.

The recognition of the lack security and the undeveloped status of indigenous language broadcasting in Northern Ireland in comparison with Wales and Scotland is valid and important. While the promise of funding for the Irish Language Broadcast Fund for two more years from 2009 is welcome this fund needs to be put on a properly resourced long-term footing in order to allow for proper long-term planning and security for the sector. The basis of the allocation of the fund needs be broadened to allow for the funding of the Irish language radio sector as well as television.

With regard to the provision of public service broadcasting for the Irish language community, the community station Raidió Fáilte has been providing a broad-based, quality radio service in the Belfast area for over two years which has been well received by listeners from the Irish language community and from outside of that community. It has also received a positive response from the émigré Irish community around the world who listen to the Raidió Fáilte internet service www.raidiofailte.com. It has since its inception had an important public broadcast service to the Irish language community in the Belfast region.

Given their experience and level of contact with the Irish language community throughout the north of Ireland, of those involved in providing the Raidió Fáilte service, any future model for the provision of a radio service to the Irish language community throughout Northern Ireland could best be achieved by the extension of the service currently provided by Raidió Fáilte on the airwaves, to cover the whole region. The Raidió Fáilte service could be widened without great difficulty to facilitate input from and reception by the Irish language community throughout the whole of the northern Ireland region. While the extension of the area of broadcast of Raidió Fáilte to allow access by the widely spread Irish language speaking community would be a cost-effective way of providing a public broadcast service on the airwaves to the Irish language community in the region, the station would, as has been said of the whole community broadcast sector, need to be properly resourced and funded to properly fulfil that role.

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?:

The model must allow for the growth of the service to the Irish language community. The major broadcasters; the BBC television and radio and Independent Television

have proven unwilling or unable to provide an adequate level of service to the growing Irish language community. In Belfast Northern Visions/NvTv has shown a willingness to provide a television service for minority communities including the Irish language community. A model which allows access by local TV such as NvTv and community radio such as Raidió Fáilte to platforms such as Freeview would help enhance the provision of public service broadcasting to minority communities, including minority language communities.

The model should allow for the community Irish language service established by Raidió Fáilte to be expanded and resourced to enable it to provide an Irish language community and radio service on the airwaves throughout the whole of the north of Ireland.

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

Increased out of London production is essential if the ethnic, cultural and linguistic diversity is to be properly served.

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.):

The recognition of the underdeveloped status of indigenous language broadcasting could be welcomed if it indicates a change in policy on the part of ITV/UTV. This recognition has been sadly lacking in the provision of Irish language services by UTV in the past. Any future model of UTV provision must include proper provision of services for the Irish language community.

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

The provision of children's programmes needs to reflect the ethnic cultural and linguistic diversity of society. In many minority communities there is an understanding of the importance of children's broadcasting provision that reflects the particular circumstances of their community. This is particularly the case with minority language communities. It is not accidental that SC4 is the second largest commissioner of original children's programming. A greater commitment to reflect and involve the many diverse and minority communities in society could lead to a greater emphasis on children's broadcasting and any new broadcasting model should recognise this by allowing proper provision for minority language broadcasting.

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?:

yes

