

**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?:**

in part

**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?:**

In part - see comments in section 11.

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

In part - see comments in section 11.

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

In part - see comments in section 11.

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

Very important

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

I believe that local PBS is imperative to very localised regions such as the West Country. See comments in section 11.

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

In part - see comments in section 11

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

See comments in section 11.

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

No opinion.

**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?:**

See comments in section 11.

**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?:**

Channel 4, in my perception, has never had a 'local flavour' - I am concerned about the 'rationalisation' of one of the two main local public service providers, ITV.

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

No opinion beyond my comments in part 11.

**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?:**

I believe that if ITV are allowed to downsize from 17 to 9 regions then regions such as the West Country and the far north of England will suffer greatly.

**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?:**

Whatever model keeps Somerset/Gloucester/Bristol regional broadcasting in Bristol and Cornwall/Devon/part Somerset regional broadcasting based at Plymouth.

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

See my comments and concerns in section 11.

**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.):**

No opinion.

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

No opinion.

**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.

### **Comments:**

I believe Ofcom should reject the current ITV proposals to combine the current ITV West and Westcountry regions. I am convinced the ITV plan would not serve the needs of people in the south west. There are alternative plans that would allow ITV to cut its spending without losing the local service that is much appreciated by viewers in the region.

The proposed region would stretch from Tewkesbury in Gloucestershire to the Scilly Isles. Tewkesbury is as close to Newcastle as it is to Land's End.

The south west, as covered by Westcountry and BBC Spotlight, is a distinctive region with a character very much its own. In a larger region the news agenda would be dominated by the concerns of metropolitan Bristol, the booming M4 corridor, and the wealthy counties of Gloucestershire and Wiltshire. The problems of the far south west, with high prices, low incomes, poor transport, and struggling traditional industries, would rarely be aired.

The ITV proposal to have local 'opt out' news services of around six minutes duration are completely inadequate to serve the needs of the local population. The most recent proposal to have a separate opt-out news lumping Cornwall and Plymouth together means Plymouth would get no news covering the rest of Devon.

ITV's plan is to pre-record the 'opt-out' news segments. The vast majority of broadcast journalists have a deeply held belief that news should be transmitted live.

I am deeply concerned about proposals to move the studio outside the region. The south west's regional news programmes have a long tradition of close association with their audience. In its most recent report Ofcom noted the affection audiences in

this region have for their local programmes. This relationship cannot be maintained if the programme is presented by people sitting hundreds of miles away in a studio 'hub', as proposed by ITV.

Moving the studio outside the region would have a serious impact on jobs. Under the ITV plan it is likely that only a handful of journalists' jobs would remain in the Westcountry region. Technical, operational, administrative, and support staff jobs would disappear.

Closure of Westcountry's studio would have a wide economic impact. The loss of jobs, most with salaries above the regional average, will impact on the immediate area. There would also be an effect on the wider economy of the south west. A University of Plymouth report in 2001 said ITV in the west and south west 'contributed £30.5 million to South West GDP in 2001 and supported 558 full-time equivalent staff'. This has declined as a result of cuts already made in features and current affairs programmes, but the south west's share would disappear almost entirely if Westcountry were to close.

The same report, by Prof. Peter Gripaio, also noted that ITV 'has been important in many cases for the early survival and growth of independent companies in the region. In this way, ITV companies have acted as a 'growth pole' for the cultural and media industry in the South West'. The largest independent production house outside London is based in Plymouth. This would have been unlikely if there were not catalysts like the BBC and ITV regional centres in the city.

Cuts to commercial regional broadcasting may well impact on the BBC's regional news service. The BBC has a long record of reacting to commercial pressure and there is concern that the corporation's commitment to regional programmes for the south west would wither in the absence of direct competition. This is a view shared by many colleagues at BBC South West who strongly support the campaign to maintain ITV's regional programmes.

The loss of a distinctive local television service would have a huge impact on the cultural as well as economic life of the region.

Westcountry Television has been a great champion of arts and sporting events. The ethos of the station from its founding has been to 'celebrate the south west'.

Regional news has also been a powerful voice in making people aware of their environment. The region has been at the forefront of renewable energy initiatives, marine conservation areas, and many other experiments in sustainability. The loss of our news programme would mean the loss of a valuable forum for the dissemination and discussion of such issues.

Although our programme is not targeted at the young it is watched by a significant proportion of the region's children and for them it has a powerful educational element in introducing them to their area, to ideas of local democracy, and to many of the issues which will affect them as they grow into responsible citizens and 'stakeholders' in their local communities.

Several alternative plans have been drawn up by current and previous management

which retain a much larger element of local news than envisaged in ITV's current plan. Other plans have been put forward by staff here. I strongly urge Ofcom to investigate and assess these before any decision is made on the ITV proposals.