



<b>Question</b>	<b>Your response</b>
<p><b>Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible ‘service neutral’ delivery approach that is more outcomes focused?</b></p>	<p>Bectu would broadly support this approach, although we believe that there are significant number of households with elderly, vulnerable members and households where lower incomes dictate that availability and understanding of different platforms is limited and a PSM would need to ensure its broad range of programming and output is available to all. We also have some concerns about Ofcom’s capacity to monitor a given PSM’s output across a range of platforms. The current quantitative requirements in service licences may be crude, but do make measurement fairly easy when focused on single linear channels.</p>
<p><b>Question 2: Do you agree with our proposals for a clear accountability framework?</b></p>	<p>A move to qualitative criteria could both prove hard to police, and be open to new challenges to any enforcement initiatives. The consultation is not clear as to whether obligations across multiple platforms would be embedded in service licences, but this seems a fairly obvious statutory provision if enforcement is to have any effect. We believe that accountability should include a requirement to represent diversity of UK in off screen operations/ staffing as well their content, and to report whether the target metrics have been reached. We also suggest that there should be an obligation for PSMs to report in detail on their compliance with obligations to train workers under the 2003 Act.</p>
<p><b>Question 3: What do you think should be included in the PSM ‘offer’?</b></p>	<p>Bectu supports the proposal that BBC services, if distributed on any platform, should be available in full to UK licence-payers, without advertising, either in-programme, or as “bumpers”. We also recommend that other PSBs should meet the concept of an “offer” by providing a core service</p>

	<p>that accurately reflects the commitments and metrics contained in their service licences, although in the area of VOD, provision of mixed genres may not be reflected in patterns of consumption. One important condition for all PSMs must be prominence, however that can be achieved on diverse platforms. There may be an argument for public service providers to be guaranteed a minimum proportion of platform operators' trails, promotions and advertising when non-linear content is being publicised.</p>
<p><b>Question 4: What options do you think we should consider on the terms of PSM availability?</b></p>	<p>We think it is important to have prominence and availability of PSM across all platforms, subject to commercial concerns for the Licence-funded BBC, and advertising-funded PSBs. Any new regime should avoid the risk that multi-national platforms owned in different jurisdictions could reduce the prominence of PSM and therefore affect basic policy aims. There could be a requirement for platforms operating in UK to be obliged to offer prominence, a regulated fee structure or a requirement for them to meet programming criteria when re-using PSM content.</p>
<p><b>Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?</b></p>	<p>The principle of universality, and no cost at the point of consumption, remain key to UK PSBs and future PSMs. This implies a continuation of the BBC Licence Fee, for which no convincing alternative has yet been found, and the ability of all PSMs to achieve income by exploiting services over their basic offering to the UK population. Some platforms may enable sanctions and limits on UK households who have not paid a Licence Fee to receive free-to-air BBC services. There needs to be a transparent parliamentary process to determine how PSM is funded, and the level and means of payment. A combination of the BBC Licence Fee, and commercial income for the</p>

	<p>other PSBs, seems fair and proportionate. Looking at other nations who share the UK's commitment to Public Service content creation (often to prevent their broadcast services being overwhelmed by foreign programmes), the various models add up to the same as the BBC Licence Fee – a fairly uniform household tax, sometimes supported by advertising income. In our view, there is a strong argument for the UK to stick with a system that is widely understood, and generally observed, by households. The cost of the Licence Fee is competitive when gauged against subscriptions for linear cable and satellite services, and the Fee also funds the world's most varied and quality speech radio networks, which would be challenged by a subscription or advertising model, which given current technology would be hard to implement.</p>
<p><b>Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?</b></p>	<p>Commercial collaboration is vital for the survival of UK PSMs. As the consultation notes, advertising income for the commercial PSBs has slumped in the last year, and the BBC is increasingly dependent on commercial partnerships to supplement its Licence Fee income. However, strategic partnerships should not be allowed to undermine the key characteristic of our current PSBs, namely that their principal audience is the population of the UK, and not a wider world market. UK content which reflects the nation's values and culture has long proven to be attractive to world media buyers, and local public service providers should rely on the value of programmes aimed at their indigenous audiences, rather than pitching projects at international markets.</p>
<p><b>Question 7: What are your views on the opportunities for new providers of PSM?</b></p>	<p>Realistically, the question here is what would incentivise any new entity to provide Public Service content? Traditionally, the two defining characteristics have been funding (which often</p>

comes with social obligations) and geography, especially in the area of terrestrial TV and radio broadcasting, and the various funding models have been safely in the sphere of public policy. Non-linear distribution on cloud, or other, platforms, where geography is less relevant, will inevitably threaten these models, without necessarily creating commercial opportunities for new providers to move into the Public Service space. It may turn out that existing PSMs, with fairly robust business models (pace Covid-19) could benefit from sharing their content with new operators. But, without firm regulation, emerging platforms are unlikely feel compelled to offer content as diverse, sometimes with small niche audiences, as the current PSBs. Any use of regulated Public Service content would need to be subject to adequate commercial agreements that reward the producing entity. At present, most VoD platforms are not regarded as generous towards third-party content providers, although they are often willing to produce their own content with surprisingly high budgets.