

Designation of Public Service Broadcaster Internet Programme Services

Response from COBA to Ofcom

March 2025

Introduction

1. COBA is the Association for Commercial Broadcasters and On-Demand Services. It represents multichannel broadcasters in the digital, cable and satellite television sector and on-demand services.
2. COBA members operate a wide variety of services, offering news, factual, children's, drama, music, arts, entertainment, sports and comedy. Their content is available on free-to-air and pay-TV platforms, as well as on-demand.
3. COBA members are arguably the fastest growing part of the UK television industry, and are increasing their investment in jobs, UK content and infrastructure.

¹ For further information please contact Adam Minns, COBA's Executive Director, at adam@coba.org.uk.

Q1. Do you agree with our proposed methods for determining whether the IPS makes, or is capable of making, a significant contribution to the PSB's individual public service remit?

- 1.1 Yes. COBA has long argued that core public services genres, such as news, must be present within a provider that is classified as a statutory public service, and thereby receiving statutory benefits such as prominence. It is not sufficient to show only the most commercial of public service genres, which arguably would have been commissioned and shown anyway. We therefore welcome Ofcom's statement in the consultation that, in line with the Media Act, such a service: "is required to make available a range...of high quality and diverse content."
- 1.2 The issue now lies in how that is achieved. We encourage Ofcom to set out more detail how it would define what 'a significant contribution' means and how it will ensure, on an ongoing basis, that the PSB players continue to remain compliant with this definition.

Q2. Do you agree with our proposed methods for determining whether public service remit content included in the IPS is readily discoverable and promoted by the service?

- 2.1 Yes. Similarly to above, we have long argued that core public service genres should not just be present, but prominent, within a public service provider. We welcome Ofcom's statement (4.6) that audiences: "should be able to easily find and discover on the service a broad range of PSR content that informs, educates and entertains." We also support the proposal that: "providers must promote and make readily discoverable a diverse selection of genres of content."
- 2.2 It is important, however, that Ofcom sets out more detail as to how it will determine whether it considers that public service remit content is 'discoverable' and 'promoted by the service' and what action it will take if it decides that it isn't.

2.3 On news, we agree that “it is particularly important that news and current affairs content will be promoted and easy for users of IPS to discover” (4.29), but reiterate that Ofcom should set out more detail on how it determines whether news has been appropriately promoted or not.

Q3. Do you agree with our proposed methods for determining whether it is appropriate to designate an IPS?

3.1 It is unclear to us whether and to what extent the wider industry will have a say when Ofcom deliberates – especially in terms of whether to approve additional public service apps or services over and above the main apps such as BBC iPlayer and ITVX. We suggest consultation would be useful to help gauge whether the market already delivers such content (this would speak to the question of audience needs), as well as to understand the market impact of a newly-designated service. This would also chime with Ofcom’s duty to ensure fair competition.

Q4. Do you agree with our proposed process for IPS providers to apply for designation of an IPS?

4.1 As noted above, we believe external consultation with industry would be helpful for additional apps beyond the main ones.

Q5. Do you agree with our proposed methods for revoking an IPS designation?

5.1 We have no view on this.