

Your response

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Question 1: 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?	Confidential? – N We broadly agree with Ofcom's proposed approach to determining whether an IPS makes, or is capable of making, a significant contribution to PSBs' individual remits. The Media Act updates the regulatory framework to give PSBs greater flexibility in how we meet our obligations, and in assessing whether an IPS is capable of making a significant contribution to our individual remit, it is appropriate that Ofcom does so in the context of each PSB's individual remit. S4C's individual public service remit is to make available a broad range of high quality and diverse audiovisual content, a substantial proportion of which is in Welsh, and which when considered as a whole, also constitutes an 'adequate contribution' to the overall PSB remit. We would also argue that in considering whether S4C has made an adequate contribution to the overall PSB remit, S4C's individual remit as well as our respective size and intended audience should be taken into account by Ofcom. We note that content identified in our annual SoPP as intended to fulfil our individual remit will be considered by Ofcom. We have provided a separate response to Ofcom's draft guidance for SoPPs. However, we would highlight that it does not seem S4C's services outside of scope for designated IPS – such as digital news and short-form content for social media – would be covered by our SoPP, even though they would be considered 'PSB'-like services.
Question 2: 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?	Confidential? – N We broadly agree with Ofcom's interpretation of readily discoverable and promoted content, and the identified ways in which IPS providers can

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	make readily discoverable and promote PSR content. However, we have some reservations regarding the emphasis placed on news and current affairs under Ofcom's proposals. In our view, the Media Act 2024 does not place a greater emphasis on news/current affairs as PSR content over other elements of the new public service remit for television. Neither are news/current affairs provided with greater emphasis over other elements of S4C's individual statutory remit. It is therefore currently unclear to us upon what statutory basis Ofcom is prioritising news/current affairs as a PSR genre under its proposals. In S4C's case, (barring perhaps occasional exceptions) all of its content on its IPS would be PSR content by virtue of the content being mostly in the Welsh language. This is informed by both the new public service remit for television, which now explicitly recognises minority language content as PSR content, and S4C's individual remit. S4C is in a unique position vis-à-vis other PSBs to be able to deliver programming in Welsh in fulfilment of the overall PSB remit, and to make such programming readily discoverable and promoted on our IPS. We would therefore argue that programming in a recognised minority language as an element of the overall PSB remit requires greater emphasis by S4C than news and current affairs. S4C fulfils a key public purpose in promoting and sustaining the Welsh language. In our annual SoPP, we may therefore provide evidence of how content to promote the use of the Welsh language is positioned in high traffic areas: content such as programming to encourage Welsh learners, children's services, and programmes aimed at broadening the appeal of the Welsh language. Whilst S4C has a digital news service separate to the IPS, we do not currently have a policy to promote news and current affairs in high traffic areas of the IPS. Contributing factors to this are the following limitations of our current provision:

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	- S4C's nightly news programmes, produced by BBC Cymru Wales, are only made available on the IPS for a maximum duration of 24 hours after broadcast. Due to technical delays in uploading live news broadcasts to the IPS, this means that there are significant periods without a news programme on the IPS. - S4C's digital news service is making increasing use of video content, but is currently mostly text based and sits outside our IPS on its own app and website and (through short form video) on social media platforms. - S4C's current affairs quota in peak hours is 30 hours per year. Whilst S4C has several current affairs series, including a weekly farming and rural affairs programme, we have a limited amount of current affairs programmes covering new stories and we do not feel that an obligation to constantly promote these in high traffic areas is appropriate. A requirement to constantly promote news/current affairs on our IPS would come at the expense of other genres aimed at expanding the appeal of our programmes and promoting the use of the Welsh language, and would potentially lead to a more negative experience of the IPS in our view. Bearing in mind that S4C's public service remit is to make available a broad range of high quality and diverse audiovisual content, a substantial proportion of which is in Welsh, we believe our aim should be to showcase the range of content we offer, to ensure that everyone who visits our IPS finds content which appeals to them.
Question 3: Do you agree with our proposed methods for determining whether it is appropriate to designate an IPS?	Confidential? – N As stated, S4C has provided a separate response to Ofcom's draft guidance for PSBs' SoPPs. In determining whether it is appropriate to designate an IPS, we would note that the assessment regarding 'meeting the needs and interests of as

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	many different audiences as possible', should also take into account a PSB's intended audience. In other words, S4C's Welsh-language programmes are mainly intended to satisfy the needs and interests of Welsh speakers, learners, and those interested in watching content in the Welsh language.
Question 4: Do you agree with our proposed process for IPS providers to apply for designation of an IPS?	Confidential? – N We agree with Ofcom's proposed process for application and would only note that S4C intends to continue to prepare its SoPPs to cover the April-March financial year.
Question 5: Do you agree with our proposed methods for revocation of designation of an IPS?	Confidential? – Y / N We agree with Ofcom's proposed approach for revocation of designation of an IPS.

Please complete this form in full and return to mediaact.part2@ofcom.org.uk