

Dear Ms Nicolotti Squires,

I am writing to express my deep concern regarding the proposals set out in Ofcom's current consultation on the Revised Guidance for Public Service Broadcasters on Commissioning Codes of Practice. I believe that the proposed removal of prohibitions on 'matching rights' and linking conditional offers to the bundling of primary and secondary rights will pose a significant threat to the financial health and sustainability of the UK's independent production sector, and ultimately, to the diversity and quality of UK public service broadcasting.

The proposals will drastically shift the balance of negotiating power in favour of the PSBs, squeezing independent producers and hindering their ability to retain and exploit their intellectual property.

The result will be a decline in diverse supply and reduced working capital for SMEs, stifling innovation in the UK content market and ultimately restricting the range of content available to PSB commissioners and viewers.

It is already hard to enough to produce content that is creative, novel and valid to a broad audience. Its has become increasingly hard to finance my productions as the returns are so low, the changes you are suggesting will squeeze what ever right I have to try and make money further then is manageable. Im sure im not alone in thinking this will cause smaller production companies like mine to suffer and maybe no longer able to compete. We should be encouraged to thrive and be a beacon for growth and talent.

I strongly urge Ofcom to maintain the existing safeguards that protect independent producers that also ensure a fair and competitive market. I believe that a strong and vibrant independent production sector is essential for the continued success of public service broadcasting in the UK.

Yours Sincerely

Alexander Whittle
Director/ Producer
New Light Studio Ltd