

Your response

Question	Your response
Question 2.1: What do you think of the BBC's proposals and the procedures it has followed in carrying out its PIT?	I think the BBC's proposal are strong and would allow iPlayer to excel in terms of value for license fee money.
Question 2.2: What are your views on the BBC's assessment as set out in its PIT? Do you agree with its conclusions?	I agree with the conclusions. It is clear to me that there is a clear public need for the BBC to provide an expanded iPlayer service to ensure access to content is not limited to those who can afford expensive subscriptions to international providers. Indeed, this is one of the purposes of the BBC, and why we have the license fee.
Question 3.1: Do you have any comments or other views on how the sector has evolved or is likely to evolve in the future that we should consider?	The main on-demand service providers that iPlayer aims to compete with is a global organisation (Netflix, Amazon), whereas iPlayer is geographically limited to the UK. Therefore, the effect of these changes is likely to be minimal. Channel 4 and ITV already publish an extended back-catalogue of content that has not been recently broadcasted, therefore iPlayer is not
Question 3.2: Do you have any views or evidence on how viewing of individual programmes changes over time on VOD services?	
Question 3.3: Do you have any views or evidence on how UK VOD viewing might evolve in the future, including viewing to individual services or total levels of viewing?	If it follows the current trend, the uptake of VOD will increase in the future. This is especially true as VOD-only providers are creating their own "exclusive" content.
Question 4.1: What are your views on the methodology and conclusions of the BBC's assessment of public value generated by the proposals? Are there any impacts on public value that have not been identified by the BBC? Please provide evidence to support your views.	The methodology is thorough and the conclusions show a strong public benefit. 66% and 63% of those surveyed as part of the PIT agree successively that iPlayer changes would benefit people generally, and that iPlayer changes would benefit them. The BBC's Royal Charter sets out the BBC's core value it should provide to its audience. In terms of impact on public value, I cannot think of any that were not identified by the BBC.
Question 4.2: Do you agree with our	Ofcom could carry out similar research as

<p>approach to reviewing the BBC's assessment of public value generated by the proposals? Please provide evidence to support your views.</p>	<p>the BBC such as surveying target population. However, the Public Interest Test results show a strong conclusion that Ofcom should be independently able to verify.</p> <p>It would be interesting to see a breakdown in the figures achieved above, to see which parts of the market agree and disagree the most.</p>
<p>Question 5.1: Do you agree with the concerns that we have set out in Section 5, or are there any others that we should consider? Please provide relevant evidence to support your views.</p>	<p>I disagree with 5.3 (a) and (e). VOD services provided by PSBs already offer what iPlayer's proposed changes offer.</p> <p>International players like Netflix and Amazon will still have an interest in BBC content, as the tender for said content is worldwide (or for a large geographic area), and cannot be affected by changes to iPlayer within the UK. In Q3 2018 (https://dazeinfo.com/2019/01/07/number-of-netflix-streaming-subscribers-us-international-dgraph/) Netflix had around 140 million subscribers, with the majority based in the United States. Hence, any impact on for-profit companies would be minimal and should pass the test against competition.</p>
<p>Question 5.2: Please provide evidence on whether and how the BBC's proposals could directly impact on rivals' viewing, revenues and investment.</p>	<p>PSB streaming services (such as ITV Hub and 4OD) do not contain BBC content that is likely to be shared to iPlayer with these proposals. Therefore, the proposals would have minimal impact on the content available on these services.</p>
<p>Question 5.3: Please provide any evidence on whether there might be reduced access to content rights, and whether this might reduce the ability of rivals to compete and why. We also welcome evidence on the alternative sources of content rivals would consider.</p>	<p>PSB services, as above, seldom include BBC content, so this is irrelevant in terms of competition.</p> <p>Rival providers (such as Sky's Now TV) attracts audiences with a large proportion of international content, for instance Game of Thrones.</p> <p>I do not know the statistics on how BBC content is consumed on UK-based rival providers, as I do not believe they are in the public domain. However, I find it unlikely that these services would lose access to BBC content, or that any price changes would have material impact on their ability to provide the same service.</p>
<p>Question 5.4: How do you think any potential for adverse market impact of</p>	<p>There will always be some form of impact on the market, but I believe that it will not</p>

the proposals could be reduced?

affect Public Service Broadcasters who provide an on-demand service for the above reasons discussed. I think a reduction in adverse market impact could be achieved by freezing or limiting the change in price for secondary rights to programmes.

Content could also be shared from within the "iPlayer window" with other providers, allowing it to appear simultaneously on other providers. This would also be attractive to international audiences on the appropriate platforms.

However, I still believe there will be no market impact that is adverse.