

Question 1: Do you agree with our assessment of the context in which the PSB system operates, and how the trends identified might affect the PSB system? In particular, do you agree with our analysis of the independent production sector.

I agree with your assessment of the context in which the PSB system operates, but not withstanding that I think sometimes that your analysis focuses on the wrong things in your assessment of trends for genres. Sometimes comparing apples with oranges and sometimes taking a far too short term view.

For example the assessment of children's, you compare the 34% decline in spend of drama, with the 15% decline in children's.

But children's was and is so poorly funded the relevance of these stats gets lost. Drama (one genre within the adult programming portfolio) still gets 568 million compared to just 87 million for all children's programming and if you look long term you will note children's funding has fallen 50% + in 10 years.

-First run originals for children on PSB down more than 70% + in 10 years

-All first run programming for children on PSB down more than 80%+ in 10 years.

It's only really in this context that you can judge the real decimation of children's PSB.

It's worth noting that UK-produced origination is almost solely the domain of the BBC, especially since the commercial public service broadcasters are able to avoid commissioning because children's provision was placed in Tier 3 of the 2013 Broadcasting Act. My response therefore is somewhat BBC focused.

One final thing under this question.....

210 The PSB system supports the film industry both directly, through funding of films, and indirectly, through the expertise and talent they foster.

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I see no evidence whatsoever of this in children's?

Question 2: Have we identified the key differences in Northern Ireland, Scotland and Wales?

Yes

Question 3: Do you agree with our assessment that the PSB system remains strong overall?

I feel that areas of the PSB system remain Strong, Children's however continues to decline rapidly and is in a desperate state, both in terms of Original programming, for all age groups, but also for the independent production companies that try to produce the high quality, varied, content children deserve.

This problem comes in two parts.

1. Commercial Channels (ITV, Channel 4, and Five) completely reversing out of investing in children's PSB content.

2. BBC continuing to proportionally underfund children's meaning a decline in ambition, origination and innovation.

3.

1 Children having parity both in terms of funding and in hours of programming at the BBC would be the dream, and why shouldn't that be the case?

While children's hours of original content are down over 60% on the BBC over 10 years, hours of original adult content has remained stable, even risen I believe over the past few years.

It's easy to say that the children's budget has been relatively protected, but it started from such a disproportionately low point, that its almost irrelevant to compare. Children's doesn't need 'relatively protecting', it needs a complete rethink on funding - If not the industry that supports it will continue to collapse, and the range and quality of PSB content will suffer even more. Children have already lost over 80% of their first run content - how much further can this be squeezed?

Your own report shows children watch about the same hours of TV as they have always done, add this to the first runs and supporting content they then consume on line, they are watching more media than ever. Which is why its vital its funded correctly.

The Stat's area shocking:

- BBC show 64% less original first run children's content than it did 10 years ago.
- The BBC are in fact Showing LESS first run originals than before they had 2 dedicated channels.
 - 1999 - 590 hours (bbc1,bbc2,bbc choice)
 - 2012 - 538 hours (cbeebies, cbbc)
- Over the past 5 years BBC original programming first runs for children's has declined around 30%. (Hours) while first run across the BBC in the same time rose 5% (Hours)

So while children have lost nearly 1/3 of the programming, adults have more choice and diversity than ever on the BBC!

What we need is a rethink of how children's media is viewed and valued. Yes children watch some of the other BBC channels.... however nothing like to the value that would bring

parity in funding (I've done the maths!).

In my calculation based on the Ofcom report, children's content is proportionally under funded by a whopping 70%+ at the BBC.

So my recommendation would be to increase BBC children's budgets by 70% at the BBC then start cutting it the same as everyone else!

Its a question of how you value children in a PSB capacity - What is worth more?

- ALL the programming for ALL children of ALL ages, ALL abilities, Both sex's, children of ALL ethnicities, from right around the UK on ALL PSB channels - 19% of our society, during a vital time in their vast and varied developmental needs.

Or

- Edited, rerun, highlights of a single sport mostly targeted at men. (Match of the Day)

Because the second I believe now gets more funding than the first.

I was pleased to note you picked out the lack of commitment by channel four, but the fall of nearly 95% in investment from all commercial PSB channels over 10 years, must be met with similar alarm.

BBC's "protected" children's budgets, has not protected content with over 60% less origination over 10 years, this should also be seen as the shocking neglect of children media it is.

There is an anomaly in your reports for the BBC that shows the cost producing programming is relatively stable, and the children's budget relatively stable, if that was true you not expect to to see a 60%+ fall in originals in 10 years? You would expect about the same number of shows.

Im fairly certain that is due to how children's programming is accounted for and the costs attributed to it over the years at the BBC has changed over the years, and this effectively covers up a continuing decline in budgets, or is a reflection on them being asked to do more and more within the same budget. (2 extra hours CBBC). However you look at it something does not add up.

At what point in the decline will Ofcom intervene, or recommend intervention, to stop this decimation of children's PSB?

Question 4: Given the resources available, to what extent is the system meeting the needs of as wide a range of audiences as practicable?

In short no.

I think you need to look again at the BBC and Commercial channels separately, as you can clearly see that Commercial broadcasters have, all but backed out of funding children's programming.

This puts extra burden on the BBC to get it right, but this is not reflected in the budgets they are giving to make children's programming.

Meaning they are not producing a broad enough range of content for all ages of children, with a particular issue for the older children's audience.

The lack of funding pushes broadcasters in to making more "Commercial" projects as your report highlights, when it talks about more co-pro's, to my mind this sits uncomfortably with the Public Service remit. If broadcasters are paying nothing for shows they are simply showing them as adverts for secondary products, toys and books. This commercialisation, and globalisation of children under a PSB remit seems odd. This is most prevalent in the pre-school genre.

What is needed is a clear statement in the PSB Report that children's is a special case and needs further support, to set down new objectives for policy makers.

Question 5: Given the resources available, does the PSB system deliver the right balance of spend and output on programming specifically for audiences in Wales, Scotland and Northern Ireland and programmes reflecting those nations to a UK-wide audience?

Joe Godwin (ex head of children's at the BBC) said he would like to represent more children's voices from around the UK. But in the underfunded, commercialised world of children broadcasting we have to make shows that sell right round the world, so far from giving a voice to the nations and region we are in fact homogenising shows to fit right round the world.

Show production does happen right round the country, but often this is irrelevant if they have to develop it in to a world wide brand to get it funded

BBC do make a huge effort and frankly pull off miracles with what they have, but its unsustainable, and could be done so much better if only broadcasters took there PSB duties seriously including the BBC.

Question 6: Is declining investment affecting the quality of PSB and is it a cause for concern?

Childrens TV – undoubtedly. Ofcom has recognised this before this review and in this review, but what will be done?

Original Children and education PSB which go hand in hand are reducing drastically.

They are the fastest declining genre, with implications for both children and the independent producers that serve them.

I would like youth programming and children's funding placed right at the top of the PSB review agenda.

Question 7: Do you agree with Ofcom's provisional findings in the Review of C4C's delivery of its media content duties?

I agree strongly that Channel Four have not fulfilled the obligation they have to children, with just four hours of children's TV. Producing 1 program over 5 years I would say represents absolute neglect of their remit.

I think it's a bit nonsensical to even include a positive statistic that shows an increase in production, in 2013, because you were starting from 0 base, I think you should instead focus on the complete failure of C4 to meet its remit.

They have completely ignored Ofcom's previous recommendations and obligations, the real question is what can be done to ensure that they do listen this time? What are consequences if they don't? To say there is a lack of ambition for their age group is very understated, more to the point they are ignoring Ofcom completely and what teeth does Ofcom have to deal with it.

It's not good enough to simply say, C4C's research will look in to it..... it's a simple answer, produce the amount of content they are required to for this age range! If they do research they will be spending more on the research than they do on 10-14 content!

Will Ofcom intervene, or recommend intervention?

Question 8: To what extent do you agree with our assessment of the degree to which the non-PSB services play a role in helping to deliver the public service objectives? In doing so please set out your views on the delivery by the PSB portfolio channels, other non-PSB channels, on-demand and internet services and also radio services separately.

When PSB channels don't deliver under the Public service remit for children, how are we going to convince others to?

Question 9: How likely are we to see steady evolution and have we identified all of the potential alternative scenarios and risks to the system?

It is wrong to say that the advertising model produces good commercial public service content. In the children's genre (and possibly other genres) further intervention is needed.

Quotas for children's content need serious consideration in any overall exploration of possible future models for PSB. Could Children's be bumped up from Tier 3 of the 2013

Broadcasting Act to higher priority?

Any erosion of the BBC licence fee will be hugely regrettable. We would advocate an increased licence fee coupled with a dedicated financial commitment to children's content as part of Charter renewal agreement. There should be an aim for a proportionally funded children's department.

Question 10: How might incentives to invest change over time?

Currently neither Stick nor Carrot seemed to be encouraging anyone to invest properly in children's.

Question 11: Have we identified all the relevant ways in which the PSB system might be maintained and strengthened?

PSB's need to have their feet held over the fire about their lack of investment in children's, I don't think your recommendations don't include enough emphasis on this.

Question 12: Does universal availability and the easy discoverability of PSB remain important and how might it be secured in future?

Children's programming have broadly been wiped of the top of the EPG, and moved to the dedicated channels, which has coincided with a drop in viewing, so that damage has been done in children's. However it not the EPG ranking that worries me, more the general lack of funding and content for children.

Question 13: Should we explore the possibility of giving greater flexibility to PSB institutions in how they deliver public service content, including examining the scope (in some or all cases) for regulating by institution, not by channel?

Slice it and dice it anyway you like, children's regulation does not seem to be working now, and Ofcom seems to struggle to make broadcaster take it seriously, anyway this could be improved would be great.

How can we change legislation to ensure Ofcom recommendations are adhered to, and how can they be improved to ensure children are properly represented in both the BBC and right across PSB.

Question 14: Do the current interventions in relation to the independent production sector need to change in light of industry developments?

Tax Credits are a great incentive to do the work in the UK, but if there is no work because no one is making children's shows, it won't make a blind bit of difference. Especially in terms of the PSB remit.

Question 15: Have we identified the right options when considering potential new sources of funding, are there other sources of funding which should be considered, and which are most preferable?

First there needs to be a general consensus children's PSB is drastically underfunded, BBC should move budget to give it parity with adults programming.

The commercial channel may well need some incentive as well as some regulation to produce a reasonable amount of children's PSB.

This Ofcom Review may well be the final opportunity to ensure the future of children's PSB in the UK.