Question 1: Do you agree that public service provision and funding beyond the BBC is an important part of any future system?:

As illustrated in the second phase of the Ofcom consultation there is strong public support for PSB beyond the BBC. Audiences believe that competition for the BBC in PSB is critically important as evidenced by their rejection of Ofcom?s BBC only model. Three quarters of people are willing to pay an average of £3.50 per month for PSB on other channels and I do not think such public outcry should be ignored. Further, the BBC needs to be held accountable for the standards of its PSB through a competitive model. If there is no alternative to the BBC there will be no standards for it to live up to and no choice for the consumer as to what they perceive to be a superior PSB provider. Although the BBC is a valued and irreplaceable part of PSB the recent outcry surrounding BBC Local illustrates that the public see a danger in allowing the BBC to have a virtual monopoly on public service provision for which there is a very large audience as illustrated by the 16 million viewers of the BBCs regional news programming at half six every week night.

Question 2: Which of the three refined models do you think is most appropriate?:

I favour the evolution (first) refined model which allows all terrestrial channels to continue to have PSB obligations with additional funding being provided from the public purse for regional news, obligation for which would fall on ITV. It is of paramount importance that commercial PSBs retain their role to ensure plurality which would be lost under the BBC/Channel 4 (second) model. Further, with the second model there is the worry that BBC funding could be lost to Channel 4. The competitive funding (third) model should be rejected on a basis admitted in the report itself; it could lead to a reduced role for the BBC. Retaining funding is all important in sustaining the standards of the BBC.

Question 3: Do you agree that in any future model Channel 4 should have an extended remit to innovate and provide distinctive UK content across platforms? If so, should it receive additional funding directly, or should it have to compete for funding?:

The role of Channel four as an innovator is fundamental to public service broadcasting in the United Kingdom. However, any extension of its remit should not be at the expense of PSB, especially that of a regional nature. As long as PSB commitments are retained, however, I agree that the evolution model should be implemented with an extended remit for channel 4. Under this model, Channel four should not have to compete for funding as to ensure the production of high quality innovative programming, minimal cost should be a secondary consideration. UK productions are inevitably more expensive than buying overseas content but should be encouraged. If Channel four were to have to compete and attempt to undercut other potential providers they would have to sacrifice some of the originality and innovation for which they are known.

Question 4: Do you think ITV1, Five and Teletext should continue to have public service obligations after 2014? Where ITV1 has an ongoing

role, do you agree that the Channel 3 licensing structure should be simplified, if so what form of licensing would be most appropriate?:

ITV?s role is central to the future of PSB. ITV?s success has long been based on its regional roots which are not replicated by any other broadcaster. ITV is perceived by the public as a channel whose success has grown due to its strong regional support and it is this perception that renders it of paramount importance to the viewing public. As seen above, the public value a strong commercial input in PSB to provide competition for state sponsored models and ITV is the only commercial broadcaster with the existing infrastructure and public trust to fulfil this role.
Five has an essential role in contributing to children?s television. They constantly invest in UK inspired children?s animation which is an essential component of UK PSB. Teletext also needs to be retained as a PSB for those individuals who do not have internet access to be able to find news and other current affairs information. However, I understand that PSB funding must have limitations and due to the overwhelming amount of individuals with internet access, competition appears to not be as important in this area. As such, Teletext funding could be reduced with the main provision of such services falling on Ceefax.
Although the value of the spectrum that they currently receive will fall significantly after the introduction of digital broadcasting, other benefits that they receive should not be dismissed so lightly as to require a complete overhaul of the Channel 3 licensing structure. The costing done by ITV never takes into account how much revenue is or could be raised around regional news and information programming. ITV are using advertising minutage elsewhere other than during regional broadcasting so of course it cannot presently make a profit. The combined audience of the 15 regional news programmes broadcast at half past six on BBC1 is the biggest television news audience in the UK with 16 million weekly viewers; ITV should be using the advertising potential of such huge audiences to its upmost. Furthermore, if ITV relinquishes its role as a public service broadcaster it will lose its prominent position on the electronic programming guide, the inherent and unquantifiable value attached to being a public service broadcaster and the viewers that remain watching ITV following the viewing of regional programmes.

Question 5: What role should competition for funding play in future? In which areas of content? What comments do you have on our description of how this might work in practice?:

As previously mentioned I support the evolution model of public service broadcasting rather than the competitive funding model. I do not believe that competition for funding has a place in provision of PSB. Such programmes; especially those of a regional nature; are expensive to produce and so any model based on competition could lead to a reduction in the standard of programming being put out, with broadcasters attempting to cut corners in order to undercut other competing for funding. Further, regional broadcasting requires an established production infrastructure which will not be present in all channels which may compete with reduced cost provision.

Question 6: Do you agree with our findings that nations and regions news continues to have an important role and that additional funding should be provided to sustain it?:

As Ofcom have recognised; the provision of regional news for England is essential for any future model of public service broadcasting. Furthermore, the report illustrated the public support for regional programming, with 50% of consumers saying that they are personally interested in events in ?my region/nation? or ?events where I live?. This is further illustrated by the huge viewing figure received by the BBC for their regional content.
Not only is regional programming publicly supported but regional production can provide jobs and money in the regions as has been illustrated by the BBC?s regional commitments. For example, in my own region of the North West MediaCity UK in Salford will be home to 1600 currently London based staff and 800 new Manchester staff. However, I do understand the expenses involved in regional production, which, coupled with decreased advertising revenue due to competition between channels, necessitates increased funding for regional production.

Question 7: Which of the three refined models do you think is most appropriate in the devolved nations?:

Question 8: Do you agree with our analysis of the future potential for local content services?:

Question 9: Do you agree with our assessment of each possible funding source, in terms of its scale, advantages and disadvantages?:

Question 10: What source or sources of funding do you think are most appropriate for the future provision of public service content beyond the BBC?:

I support two sources of funding for public service broadcasting, regulatory assets and industry funding such as levies. Regulatory assets such as spectrum pricing, advertising and the granting of public service broadcaster status for more channels could provide valuable and needed public sector funding however I do not think that this source alone would provide adequate funding for the level of public service content outlined above. As such, industry funding such as levies could top up this source; a levy on turnover could provide significant funding for public service broadcasting providers from non public service broadcasting providers. I do not support the direct public funding of public service content through taxation or spectrum auctions/charging as it could impact on the editorial independence of commercial channels. Commercial channels should be free to be innovative and therefore it is essential that they are politically independent.

Question 11: Which of the potential approaches to funding for Channel 4 do you favour?:

Question 12: Do you agree that our proposals for 'tier 2' quotas affecting ITV plc, stv, UTV, Channel TV, Channel 4, Five and Teletext are appropriate, in the light of our analysis of the growing pressure on funding and audiences? priorities? If not, how should we amend them, and what evidence can you provide to support your alternative?:

I am extremely disappointed by Ofcom?s proposals for ?tier 2? quotas. These quotas have been described by Ofcom as a short term stabilisation plan to protect regional broadcasting in the long term but I perceive these decisions as the beginning of the end for public service broadcasting. The huge reductions in public service broadcasting especially regional news seem to be beyond recovery, the merging of regions and corresponding job cuts will not be able to be reversed; we should be preserving this infrastructure not perpetuating its demise.

Additional comments: