

Submission to BBC Three Channel Public Interest Test Consultation

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As a media academic who taught at the time of the removal of BBC Three as a broadcast channel, I can vouch for the dismay many students felt. They decried the potential erasure of the channel so soon after its successful launch and growth. They felt that the campaign to save the channel, led by creatives they admired, had been ignored. This fed into a wider sense that the voices and needs of young people were being ignored or relegated in favour of policy decisions and resources oriented to serve older people, whose greater propensity to vote contributed to their disproportionate influence. Of course, despite the inaccurate stereotypes of media studies teaching, the aim was not to reinforce viewpoints, but to encourage active research, analysis, evaluation and discussion. Teaching classes over many years with a majority of young, working-class, Black and minority ethnic students I am also aware of the disaffection and disengagement that the proposals for BBC Three seek to address. On the whole, students had a positive experience with selected BBC services, like Radio 1, 6 Music, BBC Three and other output, but that did not always add up to a straightforward valuation and affiliation to the BBC and public service media (PSM) as a whole.

The decision in 2015 to make BBC Three online only was a poor one, though one made in the context of severe budget cuts imposed by the Chancellor of the Exchequer George Osborne in 2010, and mounting pressure from within Government and from hostile (and commercially interested) commercial media.

The proposal to re-establish BBC Three on a broadcast platform is very welcome and appropriate as part of a strategy to strengthen BBC services and access for young people across the UK. It is especially welcome to see the channel budget increased to £79m. This is more than double the budget of £30m that the online-only BBC Three was reduced to in 2017-18. The proposal to commission and broadcast over 300 hours of first-run programming is also very welcome and a significant investment, although it would be valuable to identify within this a high target for original UK programming.

Question 1: What do you think about the potential public value of our proposals for a BBC Three broadcast TV channel, including the extent to which our proposals contribute to the BBC's mission to serve all audiences through the provision of high quality and distinctive output and services which informs, educates and entertains?

This consultation shows that the annual operating costs to provide the broadcast channel, in addition to the online provision, is estimated at £2m. The total costs of distribution, technology and operations for the new channel are estimated at less than one million per year (£0.8m) including broadcast and online. That is approximately one per cent of the total annual costs of £79m. There are broader issues about the allocation of spectrum across SD and HD services and how that is best delivered across the suite of BBC

channels, but the value case for broadcasting BBC Three is very strong on economic grounds. The additional costs of broadcasting the channel are modest and do not threaten the content budget and spending on original programming. The public value test encompasses the cultural and societal benefits of the service. Here, the case for broadcasting BBC Three is also very strong on the grounds set out in the proposal. Yet my submission makes two main points. First, there is potential to develop and articulate value further. Second, there is some risk of tensions developing between objectives. Serving the northern C2DE audience that is rightly identified should be done in consort with and not at the expense of engaging at all levels of content, creativity, commissioning and access, with the ethnic diversity of the UK and interlinking across international reporting and storytelling. There is scope to develop proposals and strengthen the targets and monitoring here.

Question 2: What do you think about the benefit to audiences who will watch the channel, as well as wider potential social and cultural impacts?

The core argument to serve ‘a significant and relatively stable group of younger viewers (often C2DE, often in the north of England, often with less access to digital on-demand services)’ is a strong and compelling one. The BBC should seek to do so, and measure its success. However, the channel should not serve an actual and imagined composite of that audience alone but should seek to serve the diversity of younger audiences across the UK as emphasised in other parts of the proposal. There are risks, especially under the political pressures arising from the current configuration of post-Brexit politics, that forms of cultural majoritarianism arise. It is important that the regions are recognised for their complex make-up and for the diversity of identities and interests within them, and linked across them and globally. BBC services can provide connections for cultural identities, for communities of interest that cross and intersect regional, ethnic, gender, class or other identifications.

Question 3: What impact (positive or negative) do you think our proposals for a BBC Three broadcast TV channel might have on fair and effective competition?

The debate on the market impact of a BBC channel offering entertainment to young people goes back to BBC Choice in the 1990s and BBC Three in the 2000s. These discussions must now be reframed in the context of developing the creative industries as whole, and in each sector, from commercial SMEs to social enterprise and community media initiatives. The other key context is the growth of on-demand streaming platforms such as Netflix, Amazon Prime and Disney that are ultimately owned and controlled from the United States.

It is vital that any competition/market analysis addresses and encompasses content and cultural value.

One of the key aspects of public value for the BBC Three proposition concerns what academics term 'cultural proximity' (Straubhaar 2003). Audiences, argues Straubhaar, value content that is proximate to their lived cultural experience, made up of "humor, gender, images, dress, lifestyle, knowledge about other lifestyles, ethnic types, religion, and values." (Straubhaar 2003: 77-78). The on-demand services that are rapidly increasing their share of audience time, significantly undersupply such cultural proximity. BBC has been very successful in providing cultural proximity.

In line with my comments above, it is important that cultural proximity is not naturalised but recognised as complex. As Iwabuchi (2002: 131-132) argues:

[Cultural proximity] runs the risk of representing culture in an ahistorical and totalizing way. Such an approach tends to be based on the assumption that there are given cultural commonalities which spontaneously direct an audience's interest toward media texts from culturally similar region, but it ignores the diverse historical contexts and internal differences which exist within cultural formations....It is the sense of historical contingency that tends to be suppressed in the notion of cultural proximity.

The case for BBC Three is strengthened by the provision of factual and current affairs programmes in ways that can engage and inform audiences. The more commercial orientation of competing channels reduces the proportion of these genres, notwithstanding some excellent programmes.

There can be no reliable analysis of competition that is not able to identify all the relevant features of what programmes and services are made, how they are made, where they are made, who makes them, and how they relate to the organisational, and economic conditions shaping their making.

The significance of the advertising-free media space the BBC provides for users must be addressed in any market and competition analysis.

The argument that BBC Three would be duplicative of existing commercial or commercial PSM content, tends to ignore entirely or downplay the significance of both advertising revenue and brand funding across sponsorship, product placement and advertiser-finance content. As a PSM channel, BBC Three will take no advertising, will not permit paid product placement and will not carry programmes that are funded by, sponsored or supported by brands. It is important that the channel will commission and fund programmes that are based on PSM principles, insulated from the direct and indirect requirements to serve advertisers. Going forward, that ad-free space and provision will only grow in importance in an increasingly commercialised media landscape. There are many relevant aspects but to identify one: many issues affecting young people's mental health and wellbeing link to the messages of commercial services and marketing. BBC Three will provide an important space that is shaped by PSM values, including space to debate these issues without the consequences that may inhibit ad-funded services. Set in

the context of the market for ad-funded content and services for young people, BBC Three will take a very small share of the communications space, young people will access, but make a qualitatively important contribution.

There is no reference to gender in the proposal, except in programme titles. The case for BBC Three would be strengthened by addressing this and showing how the BBC, in in-house production, commissioning, auditing, training and support can contribute to greater access, equality and diversity.

Question 4: Are there any steps you think we could take to minimise any potential negative effects on fair and effective competition or to promote potential positive impacts?

The market impact needs to be framed in broader terms to assess the way provision of programmes to young people engages with the diversity of voices and lived experience of those living in the UK who BBC Three will serve.

The proposals to link with national and regional screen agencies, to support creative talent are all very welcome, as is the emphasis on commissioning and supporting regionally based or small independent production companies who can increase the ethnic and cultural diversity of creative output. Yet the vision for commissioned work is focused on the commercial independent sector. There is potential for a broader vision and proposition than that outlined in the paper.

There is scope to add a wider role in commissioning and showcasing creative work by young people themselves, and work by a wider range of content makers, including those supported by community arts, education at all levels, youth services, disability services and other resources and networks. Showcasing such work on the broadcast channel (as well as online) as part of the programme mix, would also strengthen the core arguments, as it would provide routes to discoverability of culturally relevant (proximate) content to the core audiences identified in the proposal. This forms part of a wider vision for the BBC as the principal PSM content provider, but also serving as a gateway to networked public services across communications, culture and community life.

The prominent position on the EPG is very important and I support the BBC's case to ensure BBC Three features in the top 24 channels.

References

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