

BBC Three Channel Public Interest Test Consultation**Response from the WGGB (The Writers' Guild of Great Britain)**

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?

WGGB welcomes the proposals for a BBC Three broadcast TV channel, indeed it was a matter of some regret to WGGB when the channel moved to online only.

We agree that the target audience (16 – 35) is currently underserved in linear broadcasting as is the 'stretch' pre-watershed audience of 13 – 15 year olds that will also benefit from the proposals.

The ongoing Covid 19 pandemic provided the BBC a unique opportunity to demonstrate the value of public service broadcasting to a new generation. It is vital that it now capitalises on the success of its high-quality educational programming for school age students by providing new broadcast content that will continue to appeal as they enter adult life. This younger end of the projected audience range is more likely to seek out and access BBC Three than go to CBBC for content and so we believe this mitigates the loss of two hours of broadcast time on CBBC.

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?

Amongst all of the discussion of online/digital content, it is important to remember that we remain a long way from universal digital access to online programming – a fact emphasised during the pandemic. Many families/individuals do not have home access to a computer or broadband and do not have sufficient resources at their disposal to access alternative data provision via mobile phone networks. With unemployment set to increase as result of the combined impacts of Covid 19 and Brexit, access levels are unlikely to change in the near future. It is therefore more important than ever that the type of content so successfully produced by BBC Three is available via linear broadcast.

There are some caveats to this response.

The BBC plays a major role in creative ecology of the UK, particularly in its role as a commissioner of new work. We note throughout the proposal document, discussion of the reallocation of resources across BBC channels, including a reduction of drama spending for BBC2. We understand the need for everyone to do more with less as a result of the huge financial hit the creative industries have taken over the past year,

however, a new broadcast channel at the expense of the BBC's reputation for producing high-quality original drama would be a false economy.

Similarly, the BBC cannot expect others in the creative industries to bear the cost of their business decisions. Writers and other creative practitioners must continue to be fairly remunerated for both the creation of new work and its on-going use.

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?

As mentioned above, we believe that the target audience is currently underserved in the broadcast arena and so provision of this kind represents a correction of a 'gap' in the broadcast landscape. As such we do not believe that the proposals will have a negative impact on fair competition.

We support the proposal that the new channel should appear in the top 24 slots of electronic programme guides.

The target audience identified in these proposals has demonstrated by their viewing habits that they are seeking vibrant, imaginative and authentic content that reflects the diversity of contemporary Britain.

The BBC, by commissioning new work from writers currently under-represented in the creative industries can and should have a positive impact on fair and effective competition by demonstrating to the market the wide-scale appeal of these stories.

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 proposals have enormous potential to make a positive impact and deliver on the BBC's charter commitments. However, this potential will only be realised if appropriately funded and supported.

WGGB welcomes the proposal to increase programme making in the nations and regions. It will be vital that these programmes are afforded the equivalent levels of support and investment as those made in London and the South East.