



Question	Your response
Question 1: Do you agree that a new regulatory framework for Public Service Media (PSM) delivery should support a more flexible 'service neutral' delivery approach that is more outcomes focused?	The key issue is outcomes focused and these outcomes need to be clearly defined, particularly in terms of content (see Q3), universality of provision and delivery channels
Question 2: Do you agree with our proposals for a clear accountability framework?	Yes, but the framework should not be too prescriptive or focus on particular areas.
Question 3: What do you think should be included in the PSM 'offer'?	The key is diversity which is often defined too narrowly in terms of "producer diversity" – the ethnicity, gender, etc of producers. Nothing wrong with this, its important but as a consumer I am interested in diversity of output in terms of genres, etc.
	The first thing to say is that in some cases PSB channels lack diversity. ITV peak time relies far too heavily on soap operas (and off-peak on talk shows). Channel 4 aims too much at the young and C5 is a bit "samey" although it is different to other PSBs so that there is a reasonable degree of variety amongst the four PSB suppliers. You could produce a long list of genres and they should all be included in the offer. I would make the following comments as to what needs to be enhanced:
	"Challenging" programmes. This doesn't mean that you need specialist knowledge to follow only a good general education but it should ask audiences to think. (There sometimes seems to be a big difference between many dramas which move fast and require a lot of concentration and many factual shows which seem to under- estimate their audience.) Often a 30 minute programme on Radio 4 covers a lot more ground than a 60 minute programme on TV. BBC 4 produces some very good narrative television (Neil Brand's various offerings as an example) but so have the popular channels (Richard Hammond documentaries on BBC 1, etc).
	General educational – not just for specific groups but of general interest. There seemed to be far more of these in the 70s and it was interesting how (as 6th former) I could follow many Open University programmes on topics I had little

	knowledge of. Many years ago BBC spent Saturday mornings highlighting OU programmes. We should have more of this.
	General "hobby" programmes. These will have relatively low audiences but would probably be cheap to produce so with a multitude of channels this might not matter. (Interestingly male dominated hobbies seem to be under- represented and indeed males watch less tv per head than females – which is not to say the two may not be correlated but gender diversity at times seems to be a little one way.) Magazine programmes in certain areas such as health and science are lacking on TV – although Radio 4 does this very well.
	It could also be argued that there are not enough regional programmes. This is particularly an issue with ITV whose strength up until the 90s was its regionalism. Ideally you would give each region say £20m which would enable around 250 hours of local programmes to be produced not just regional news but all genres (I've just been looking at the ITV in 1975 book to see how it was done). Some of these could be networked. However, this would cost around £200m p.a. and should not be at the cost of existing content. It is notable that C4 Cymru costs around £80m p.a. – more than BBC4 despite its smaller audience. Some regions audiences are better catered for than others.
Question 4: What options do you think we should consider on the terms of PSM availability?	Cable & satellite providers should be required to carry PSB channels.
Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?	The problem is that the Government effectively determines the level of the TV licence and it would be desirable for that for this function to be carried out by an independent review body. One solution would be for top up solutions, for example making BBC 4 a subscription service. Whilst the lack of new content on BBC 4 makes this appear worthwhile there is a danger of moving away from universality and it will affect the less well off – there will always be those who have trouble paying. There is also the danger that a multiplicity of high cost outlets means that users will have to make a choice and only subscribe to a few thereby missing out on the

	content of others. This is a poorer outcome for consumers although producers may benefit. The problem with advertising is that whilst it results in free content for the user (good) there is a danger that broadcasters will produce content aimed at advertiser friendly demographics – primarily younger people, the well off, women, etc. (Have a look at Channel 4's audience.) Other groups such as the elderly may well miss out. It is also interesting what the practise of users fast-forwarding advertising will have on business models. Sometimes requests for new services by the BBC such as extending the i-player window have been tested in terms of their impact on commercial services. This misses the point that services are for a ensumer and the effect on commercial
	for consumers and the effect on commercial providers in not really relevant. Your consultation document mentions youngers watching less PSB, and it is a very good point, but loss is said about olderly people. It could be
	less is said about elderly people. It could be argued that it should be the role of the BBC to serve them but if it is not receiving money from some people over 75 either from licences or the Government is there the incentive for the Corporation to serve them either.
Question 6: What do you think about the opportunities for collaboration we have referred to? Are there other opportunities or barriers we haven't identified?	With the current level of funding the BBC and other PSBs will increasingly need to rely on co- productions and there have been many successful examples in the past. Provided the appropriate standards are met this is to be welcomed. PSBs must be able to retain future transmission rights for the programmes.
Question 7: What are your views on the opportunities for new providers of PSM?	No particular comments.