



Question

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?

Your response

Yes. You point out clearly how the way people consume PSBs and media is changing. I mainly consume the PSBs through broadcast television — on Freeview - supplemented by the online catch-ups but recognise that we are all moving gradually to more online.

I value all the PSBs very highly. In particular I value the BBC, which has set standards for both impartial and accurate news and quality overall.* This has, as you describe, contributed to the success of the media sector, and its contribution to the overall economy. I also value content that represents the UK, as opposed to 'international', though that has its place in widening people's perspectives. During the recent lockdowns the PSBs have saved me from boredom and loneliness.

NB. Channel 5 seems to have improved markedly over the last few years.

*I use the PSBs to get my news - where it is well fact-checked - in particular BBC and Channel 4 News, along with my preferred newspapers. This applies especially when we are dealing with a pandemic, where rumours and 'fake news' are rife.

Question 2: Do you agree with our proposals for a clear accountability framework?

Yes. It I clear that output must be monitored, to ensure that the PSBs are indeed delivering programmes which 'inform, educate and entertain' and to an appropriate standard of quality. Monitoring will also be important to ensure that the principle of universality is maintained.

The prominence of PSB's is also important. I understand in the past that people used to think that BBC news, which Sky TV also carried, was in fact produced by Sky. It annoys me to think that young viewers of Netflix think that *Peaky Blinders* was produced by Netflix, not the BBC, as the BBC attracts much hostility and deserves credit where it is due. So rules about clear branding also seem necessary.

The regulations may be wonderful, and may have taken a lot of time and effort to draw up,

	but without vigorous enforcement they can be useless.
	PS. Ofcom: Please protect us all from anything like an untrammelled Fox News in the UK.
Question 3: What do you think should be included in the PSM 'offer'?	I agree that the features that you list in section 5, in particular all the features you list in 5.2, should be offered.
	In order for the PSBs to be able to compete with the global giants that you describe the BBC and the other PSB channels need to be supported and strengthened.
Question 4: What options do you think we should consider on the terms of PSM availability?	I am not expert enough to know which technical solutions are best suited to provide a 'commercially viable' means for the current PSBs to play a role within the future PSM system, but consider that this should be done in a way that strengthens, rather than weakens the PSBs. The technical sector will most likely have an interest in doing this in a way that is the least technically difficult and costly for them.
	Improving websites online: It seems people find it easier to browse on Netflix than on the current PSB websites. Could this be addressed? Is the answer to this the suggestion may be made in point 6.34: a combined PSM service with online access to all PSB content, where all programmes are easy to find. They should be well branded, so that the viewer knows which channel has produced them. I often find that I am searching online for something to catch up on and have forgotten which PSB has produced it.
Question 5: What are the options for future funding of PSM and are there lessons we can learn from other countries' approaches?	I am a bit out of my depth here, as I have no expertise about how online material is funded. I pay my subscription to my internet service provider for online and landline access and forget about it.
	However, I agree with the four key features required for a successful PSB system described in Section 5, including that of 'financial stability'.
	a) stable and adequate Without generous financial stability would the BBC ever have been able to produce the wonderful, and sometimes, inevitably, very

expensive, nature programmes presented by David Attenborough? I suspect that the UK is genuinely world-leading in terms of nature programmes. (I understand that the BBC's method of funding is fixed by the current Charter until 2027.)

A levy on all Platforms: Should all online platforms that stream media pay a contribution to PSB? If the streamers show PSB content, such as the BBC's, the appropriate PSB must be well recompensed, ideally in proportion to the amount of time the content is viewed. One of your quotes shows that an individual did not feel the need to pay a licence fee because he could watch many of the good BBC programmes on Netflix.

All the PSBs seem to require ways of supplementing the current system. The consultation document points out the costs that are being incurred by all the PSBs having to increase their online availability, and also that the cost of producing drama, because the costs of production crews is being driven up by competition. (I understand also that the introduction of HD also involved higher production costs.)

b) independent from political interference. It is vital that funding remains independent of Government to ensure that the PSBs can remain impartial. (In fact the power that the Government has over the BBC particularly when a new Charter period approaches may sometimes mean that it is possibly less impartial than, say Sky News. (See Patrick Barwise and Peter York: *The War Against the BBC*, Penguin Books, 2020; it is clearly polemical, but it points out the hostility that exists towards the BBC.)) I think the funding of the BBC should be agreed by an independent body, not the Government of the day. The other PSB's are also dependent on Government approval.

I consider that, in the long term, the country should be seeking a system of funding the PSBs that is less regressive, while being, if anything, less dependent on Government.

c) Fair and justifiable.

I am not sure how the online platforms that carry the PSB content receive their remuneration but presumably the more content they carry the more remuneration they get. To be fair the more PSB content they carry the more they should pay the particular PSB which has produced the content. Levies on Telecoms companies and streaming services in proportion to the amount of content from each PSB that they carry seems to be a promising way forward.

Subscription is not an option for the main provision. It is fair enough to have an extra option to pay to skip advertisements on the channels which are funded by advertisements. However it is vital that all the content is universally available on the basic model, funded by advertising or other means.

d) Transparent and accountable
It is important that any new system is explained
to, and generally accepted by, the public, also
that it is monitored to ensure that it is
functioning efficiently and fairly.

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?

6.35 6.36. I enjoy the collaborations that are happening already, especially in the case of the BBC. As I studied modern languages I particularly enjoy the use of TV series from European countries shown in the native languages and find the series from Australia, Canada and other English language speaking countries mind-broadening too. (I believe that these are mainly imports, rather than collaborations, but there may be room for more collaboration in that area. A Suitable Boy also involved a lot of collaboration with Indian stars and actors – whether that was a cost saving type of collaboration I am not sure.) Other people may have other favourites among the products of collaboration. Collaboration with the Open University and other institutions for the more serious programmes seem effective and are welcome.

The experience of Covid-19 may lead to an increase in collaborations with arts bodies like the RSC. Is there an opportunity for more collaboration with the National Art Museums when they put on special exhibitions? Maybe this should be sometime after the main

exhibition, and a limited view, to justify the high ticket price for actually visiting the exhibition.-which is needed in order to provide the exhibition in the first place. For most people who live in the far extremities of the UK, for instance, it would have been impossible to visit the Leonardo exhibition at the National Gallery, or the Picasso exhibition at the Tate Modern.

Extensive data sharing on viewing habits disquiets me somewhat as a member of the older generation. I dislike knowing that somewhere on the internet it is possible to find out everything about me (and refuse to use Facebook as a result). However the younger generation do not seem to mind - that is the direction things ae going in. If it could enable the PSBs to reach them, and hopefully also combat the deluge of conspiracy theories and 'fake news' I understand that, with appropriate privacy safeguards, it could be valuable.

Question 7: What are your views on the opportunities for new providers of PSM?

The various levy approaches being introduced by Canada, Australia and France all seem promising. Ideally the requirement for domestic production should be supplemented by a requirement to provide PSB content and meet a certain quality standard too. (I looked at Finland's *Kioski in Things*, which you list in footnote 198, which seems to be taking a very vigorous approach to attempting to engage with younger age ranges.)

I am very glad that Ofcom is thoroughly researching the problems the PSBs are encountering and is trying to find viable solutions to all of them. It is clearly vital that it finds ways to reach the younger generation who view nearly everything online from a variety of sources. I am also grateful that it is considering the requirements of older people who are used to linear television and is proposing a flexible framework which will enable a gradual transition within a new PSM.