

## **PSB Review Proposals for the Nations**

While I welcome the fact that Wales is being treated differently to the English regions OFCOM's recommendations still represent a reduction of half an hour over the current arrangements – and another hour will be cut over the next few years if the proposals are agreed. This is a retrograde step and a diminution of public service broadcasting in Wales.

The proposals weaken the plurality of PSB and strengthen the BBC's position. This contradicts OFCOM's commitment to "an enduring and pluralist system of PSB" that was set out in the phase two review.

If PSB is to mean anything then it must aid the expression of Welsh civic debate. Wales is a complex society marked by cultural divisions - a third of the people who live here were not born in Wales. According to research conducted for the Electoral Commission, 35-40% of people live in transmitter overlap areas. The absence of a truly national newspaper means that sources of news about Wales are limited. Welsh broadcasters therefore play a key public service role in creating an informed electorate within the devolved nation.

A plurality of providers of PSB is essential, but by easing the demands on ITV the review proposals weaken the provision.

I understand the logic of OFCOM's arguments about the financial sustainability of regional programmes after digital switchover. However as the regulator OFCOM has a duty to protect the interests of the consumer by ensuring there is choice within the marketplace. ITV clearly want to minimise their obligations in order to increase their shareprice in advance of a sale to a non-British owner. But with pre-tax profits up this year by 57% to £340 million, their arguments should be taken with a pinch of salt.

The commercial sector clearly faces increasingly fierce competition, but they also have a duty, up until switchover, to provide a public service. A duty the regulator must uphold.

OFCOM should resist lobbying by ITV to further reduce the proposed minimum number of hours. You must also ensure that the PSB commitment is meaningful – poor slots and repeated cuts in programme budgets has resulted in output with low production values– this simply allows ITV to claim that regional programming is not valued and grounds for further weakening their obligations. OFCOM should continuously monitor the quality of output to ensure high standards

I broadly welcome most of the points in the review, particularly the proposals for network arrangements. The recommendations in relation to 'No Pay No Play' and increased network productions outside Wales are sensible. I do not however support the introduction of a Welsh version of the ITN late evening news. However OFCOM should remind ITN of their obligation to reflect the diversity of communities across the UK. Wales differs from the UK greatly in health and education but this is rarely reflected in network coverage.

OFCOM must intervene to prevent PSB in Wales withering on the vine.