

## **Ofcom Advisory Committee for Scotland's response to Ofcom's discussion document on a new approach to public service content in the digital media age**

Ofcom's Advisory Committee for Scotland welcomes the opportunity to comment on this discussion document. We recognise the challenges facing traditional PSB in an increasingly digital age. The Committee has commented previously on these challenges, notably in its response to the Ofcom Consultation on the Review of Public Service Television Broadcasting, Phase 2 - Meeting the digital challenge (September-November 2004).

In that response (dated 29 November 2004), ACS commented on the specific proposals for the Public Service Publisher.

This latest document asks for views on the appropriate nature of intervention in the digital media age - and the balance between TV and non-TV forms of public service content distribution. We accept that audiences are fragmenting and that viewing is increasingly done via internet and mobile platforms. But we would caution against thinking that these platforms are used by all - even within the younger age groups who are most wedded to these forms of delivery. It is the case that availability/accessibility/take up is not uniform - many are excluded by age, geography or income (or a combination of these factors). Broadband is not available in all parts of Scotland, and even if it is, it is not at the kinds of speed which allow broadcast content quality viewing. Similarly, mobile coverage (2G and 3G) is not universal across Scotland. So if there is to be public service intervention to facilitate access to public service content on new platforms, serious consideration needs to be given to those excluded if the public service principle of universal accessibility is to be maintained.

The document asks for views on the scale of funding required. We think it is difficult to have a view of how much funding is needed until the form and function of the PSP is determined. The PSP document states that the vision does not address all of the shortfall issues identified in the PSB review and it is certainly unwise to consider the PSP in isolation from the other Ofcom PSB reviews into children's programming, news, nations and regions non-news and Channel 4. If intervention is deemed necessary in these areas, what mechanism will be used? Could the PSP be a vehicle for children's programming or non-news nations and regions programming for example?

In our earlier response, we suggested that PSP programming needed to be shown on an existing well-distributed network in order for the audience to find it - at least perhaps on an interim basis. For reasons of inclusion in line with the principle of universal access, an element of PSP-funded content may need to remain solely on a linear TV platform. This may require more funding than the discussion document proposed (£50-£100m) - perhaps to the level first proposed (£300m).

Our previous response supported the idea of a PSP although we wondered whether it would receive government support. A strong case still needs to be made that the interactive sector needs public funding in order to provide PSB content for wider distribution.

We would suggest that the PSP must be based out of London, maybe with a number of bases. Perhaps the different nations/regions could become centres of excellence for different kinds of PSP content. Scotland has a reputation for innovative programming and has a healthy new media industry which might play well into alternative forms of PSB content. We would support the notion of pluralism in content supply with perhaps a variety of PSP bases providing content for the whole of the UK.

We also consider that particular attention and much thought still needs to be given to institutional identity (or identities) of the proposed PSP so that it has a high recognition factor in the audience at a time of an increasingly fragmented offer. A PSP will have to be recognised as contributing to the public good if it is in receipt of public funding.

In terms of the operating model for the PSP we would support a commissioning approach - and consider that this should take serious account of the out-of-London creative forces that exist and which are disadvantaged by the current commissioning strategies of (mostly) London-based broadcasters.

If the PSP is to use public money for PSB purposes then there is a further issue around inclusion/exclusion beyond the geographical, namely consumers' ability to understand and use different media platforms. Ofcom research has shown that young people feel more comfortable using new media (although even for them there may be issues as there is no harmonisation of operability of handsets). But many older people may feel excluded from accessing content over non-linear platforms.

Furthermore, lack of interoperability of platforms on mobile leaves the content producer with the costs of reversioning content for different platforms if the principle of universal access to PSP-funded content is to be achieved, further adding to costs.

The business has a complex topology. It is difficult to work out the value chain as there is no publisher. Aggregators become the gateway. Business models are based on revenue share with revenue coming from sponsors and shared with platform, performers, content producers etc so there is salami slicing of revenue with no-one really getting enough to reinvest. Is this in the public interest?

We note that Ofcom has issued a discussion document on the PSP. We would ask that Ofcom's proposals be subject to the deliberations of a wider audience, by using the tried and trusted consultation format - with consultation events organised throughout the UK, and certainly in Scotland. This is too important a subject to be left to the vagaries of those who may happen upon the document via the Ofcom website.

We support the work planned to look at children's television and Nations and Regions programming. In our earlier response to PSB2 we noted the wider cultural, political, social and economic roles which broadcasting plays in this devolved country of Scotland. Our view as to the importance of these has not changed. We also supported the notion of a plurality of provision as bringing benefits for viewers - in particular, that there needed to be an alternative to the BBC. We look forward to being engaged in these reviews of other aspects of major importance in the broadcasting landscape in Scotland.

Thomas Prag

Chairman, Ofcom Advisory Committee for Scotland

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