



BBC Charter Review Consultation
Department for Culture, Media and Sport
2-4 Cockspur Street
London
SW1Y 5DH

29th April 2005

Dear Sir,

As a leading independent supplier of radio programmes to the BBC, we have two points to contribute towards the consultation paper on the future of the BBC.

The Existing BBC Quota for Independent Radio Producers

The BBC maintains that it has a voluntary quota of 10% of eligible hours set aside for independent production and that this is 'a floor not a ceiling'. This voluntary quota was designed to forestall legislation in 1989 and is managed by the BBC to suit their purposes.

The key phrase is 'eligible hours'. In reality, independent suppliers are excluded from large parts of the BBC's output. The allocation to independent production of only 10% of what is left means that only 6% of BBC Radio output hours are actually sourced from independents.

There is no reason why the BBC could not increase the amount of programming it commissions from independent radio producers to provide parity with independent television producers' quota of 25%.

The BBC argues that the independent TV sector is different because it does not rely on the BBC for its existence whereas independent radio producers do. The BBC maintains that it is not its role to create and sustain profit making by independent radio companies. This is nonsense. Almost every independent radio producer, ourselves included, survive not on the BBC's meagre fees but on the provision of radio and audio services to commercial radio organisations.

Quality cannot be an issue. To take just one measure, the independent sector's record in winning Sony Awards – the industry's BAFTAs - is way out of proportion to its 6% of output. Nor can it be capacity – there are already over 100 companies supplying radio programmes and supply will meet demand (especially with the large numbers of BBC producers expected to be made redundant).

The BBC's Proposed Extension of the Independent Radio Producer Quota

The BBC propose opening BBC Radio Nations and Regions along with children's programming, sport and the digital radio channels to independents. This is welcome but of limited value to independent suppliers without significant changes to commissioning policies and budgets.

The BBC proposes that only production companies based outside of London should be allowed to bid for regions programming. This is both anti-competitive and likely to lead London-based companies merely to open shell companies outside of London, thus defeating the purpose.

The opening of digital channels is of little current consequence since their programming budgets are negligible. There is next to no children's output on BBC radio. Sport is potentially interesting but independent producers fear that they will not be able to supply the kind of services BBC Sport wants in competition with in-house teams.

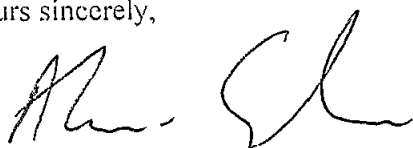
Most importantly, all these moves will be off-set by the BBC's intention to reduce programming fees by an arbitrary 15%. Without a significant increase in quota, listeners to BBC radio will not gain the benefits as have BBC viewers from the dynamism and creativity of the independent sector.

Conclusion

We believe that:

- (1) like our independent television production colleagues, BBC Radio should commission a minimum of 25% of its national output from the independent sector, perhaps with a further auditable 25% open to competition from independent and in-house suppliers.
- (2) the BBC's proposed increase does not go far enough, it is not in the right areas of programming and requires a significant increase in budget.

Yours sincerely,



Andrew Caesar-Gordon
Managing Director