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Tessa Jowell  
C/o Kennedy Humphreys  
Public Service Broadcasting Policy Branch  
4<sup>th</sup> Floor, Department for Culture, Media and Sport  
2-4 Cockspur Street  
London SW1Y 5DH

19 July 2002

Dear Secretary of State,

## **BBC's Digital Curriculum Proposal Consultation**

AVP is a company that has been solely devoted to the creation and distribution of educational software since computers were first introduced into schools twenty years ago. Its Managing Director is the Chair of the Education Software Publishers Association. AVP like the rest of the education software industry has always responded rapidly to support government initiatives and the requirements of teachers. It is fair to say that under all governments the proportion of the IT budget devoted to the critically important software element has been extremely small. (It is to the credit of the current administration that it was the first to recognise this.) In view of this what has been achieved by AVP and the industry is absolutely outstanding and recognised as such throughout the world.

Everything that has been achieved is now at risk due to the BBC's proposal which is particularly damaging in its present form and should be rejected for the following reasons.

**The proposal is not distinctive** and it is extremely easy to prove it. Repeatedly stating that a forthcoming service will be distinctive does not make it so. Now that the BBC have given presentations of their pilot material we can say categorically that it is in no way distinctive. There is no element or aspect of it that does not duplicate existing material and AVP by itself could demonstrate this with its own products and would be happy to do so. Indeed the BBC's own commissioned report from PWC can only point to size and the fact that it is free as distinctive features. However even these aspects are not distinctive. It is not large in relation to what is on offer already, indeed it would be a long time before it was larger than what AVP alone can offer at present. The fact that it is free is not distinctive – there are plenty of other free materials.

**The proposal is enormously damaging to the present market.** It should be obvious to anyone that for an organisation to enter a market of total size around £85 million with a proposition to spend £170 million to produce materials for the same relatively small range of subject matter (the National Curriculum) and then give it away free would be devastating. Indeed it is so obvious that it is in this area that the BBC PR machine has had to go into overdrive until now they even claim to be helping the industry.

The BBC have said that they will only cover 50% of learning objectives. This is spurious since far less than 50% of learning outcomes are suitable for ICT. Even if that were not so how could taking half a market away not be damaging? They also state that as a concession to industry they would outsource half of what they do to independent contractors. This is disingenuous as an offer as they have to do that anyway as they do not have sufficient skills, capacity or experience to do anything else. It does little to mitigate the damage to an industry that is based on a model of highly competitive publishers striving to produce the best intellectual properties. It is precisely this model that produces the rich diversity and choice that is available to teachers. A monolithic commissioning agent will never be able to replicate this. There is not a single example anywhere in the world where this strategy has succeeded.

There are useful roles for a public service broadcaster but duplicating what is already being done in an existing market is not one of them. Therefore **we urge the Secretary of State to reject the BBC's application entirely.** We do not believe there is any further scope for negotiation in relation to the existing application because it is too far from an appropriate role for a public service broadcaster. We are convinced that a suitable role for the BBC could be found much more quickly if it is rejected in its entirety.

As part of our submission we are also providing our trade catalogues which should give you an indication of the lack of distinctiveness of the BBC's proposal as well as some idea of the scope of the existing industry that is threatened.

In conclusion we would like to express our full support for the more detailed responses from our trade association BESA and the Digital Learning Alliance and thank you for giving us the opportunity to give you our views on this proposal.

Yours sincerely,

Robin Drewett  
Managing Director