



24 January 2002

Media Ownership Consultation Responses
Department for Culture, Media and Sport
2-4 Cockspur Street
London
SW1Y 5DH

Dear Sir/Madam

Following your invitation to express our views regarding the Consultation on Media Ownership Rules November 2001, I attach a document containing our response.

Yours faithfully

A handwritten signature in cursive script, appearing to read 'I. Mackie'.

Ian Mackie
Chief Executive



24 January 2002

UCB is grateful for this opportunity to express its views to the DCMS on the Media Ownership Rules, especially in how they relate to religious organisations.

Religious Ownership 6.1.6

UCB welcomes the proposed changes to the legislation to address the current anomaly regarding local terrestrial digital licences. However we do have some concerns that we would like to bring to your attention.

It is our view that your proposal on religious ownership continues to be discriminatory.

Since the late 1980's we have heard the same unbalanced and negative view that *"religious content has a particular capacity to offend those with different views and opinions, or sometimes, to exploit the susceptibilities of the vulnerable"*.

This statement, in our opinion, is flawed and is itself an offensive assumption. We believe it has helped to colour the decision making of most MPs and governments since this view was first expressed and has exacerbated the myth that religion is offensive.

An alternative positive view relating to religious content is *"religious content has the particular capacity to support and encourage those who may be struggling with life situations, family problems or discouragement, or sometimes, to bring comfort to those suffering loneliness or grief"*.

In our opinion, restrictive legislation for religious ownership is unnecessary in this new Millennium. If the Government, through regulatory bodies, has the ability to maintain standards for Human Rights, Racial Equality etc., we are sure it has the ability necessary to put structures and policies in place through the Broadcasting Regulators to ensure compliance of standards for religious broadcasters.

Should the Government believe they do not have the correct regulation basis to meet the market needs, maybe a review of other regulators around the globe would help identify acceptable guidelines for all broadcasters.

We find the following statement rather ambiguous: *"These concerns may not be fully dealt with by the regulation of religious content and are particularly acute in relation to terrestrial licences where scarce spectrum means that choice is naturally limited for viewers. We nevertheless welcome views on whether we could relax the prohibition when choice increases in the digital future"*.

Our understanding is that the UK is already in the midst of the "digital future". Therefore there should be no scarcity of broadcast spectrum and restrictions should be eased under the proposed legislation. In fact, through multiplex digital frequencies, there is now more availability than with the analogue spectrum, as has already been admitted in the White Paper: *"the arrival of digital networks makes it possible to deliver far more content over the same spectrum"*.

Latest information shows that 300+ digital licences will have been issued prior to this new piece of legislation becoming law, and not one of these licences will be owned by a religious organisation.

Religious Ownership 6.1.8

It is our opinion that religious organisations should be able to apply for all licences on the same basis as everyone else, including local, regional and national, analogue, digital multiplex, satellite and programming licences.

Legislation that restricts one segment of society from making application for a broadcasting licence for no other reason than their choice of lifestyle ie following a religion, completely baffles us.

We are also baffled as to why the Government is so concerned about whether a religious organisation decides which programmes may be broadcast on a multiplex in comparison to some other organisation who is only interested in financial profit?

May we ask if it is the Government's view that a non-religious multiplex licence holder, who is required to return a profit to the shareholders, is a more able and responsible body to choose multiplex programming services, rather than a religious broadcaster who has family values and community interest at heart?

If the Government is rightly concerned about the issue of competing financial bids between religious organisations with licences being awarded to the highest bidder, maybe an alternative model should be found which would allow religious broadcasters to apply for a licence under a different criteria. For example, licences could be given on grounds of percentage in the population.

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A "bidding-war" is not however, sufficient reason to restrict broadcasting freedom for religious organisations. The Government does not apply the same criteria to any other segment of society, so why single out religious broadcasters?

We have always believed that diversity of content through increased choice was the goal of the new broadcasting legislation, and we hope that the Government will be bold enough to include ownership by religious organisations within the framework of its goals.