

Institute of Local Television response to DCMS *Sustainable, independent and impartial news in the Nations, locally and in the regions*

1. *Do you agree that securing plural sources of impartial news for the Nations, locally and in the regions should be a key priority?*

Yes. We cannot expect the BBC to be willing or able to fill all the required gaps in local news, nor would it be healthy for them to be the only provider of local broadcast news. In 1982 BBC Scotland's *Journalism Review* identified demand from 81% of viewers seeking a more local TV news than available from the BBC in Scotland. In responding to this consultation it is useful to note that 'local' should not be confused or subsumed by 'regional' scales of delivery. Throughout Scotland there is a proven demand for news both for the South of Scotland and for its two component parts - Dumfries and Galloway and Scottish Borders.

2. *Do you agree that sustainable, impartial news in the Nations, locally and in the regions is likely to require some top-up public funding?*

Yes. Whilst there may be a few areas of the country, namely the large metropolitan areas, which could sustain a commercial local news channel, large geographic rural areas with small populations are not suitable for a commercial only solution. The principle of public service broadcasting offers equality of access to high quality news and programmes regardless of location. A cherry-picked approach to serve commercially viable urban areas with local news would leave the rural and less populated areas with at best a safety net and impoverished service. A holistic approach to local news provision on TV remains necessary to ensure equal standards of PSB are met - we agree with Digital Britain's findings that the maintenance of regulated, impartial and contested public service content broadcasting is a public good requiring public intervention, the only debate is around the mechanisms to achieve this desire, both in terms of guaranteed technical capacity and/or effective policy intervention over skills and literacy sufficient to ensure full public access to services.

3. *Do you agree that the Television Licence Fee should be used to support impartial news in the Nations, locally and in the regions in addition to BBC services?*

Yes, as long as the licence fee is expected to remain as the method of funding PSB. The recent Digital Britain, DCMS and Ofcom reports and consultations have started to add 'local delivery' to 'regions and nations'. This welcomed addition tempts the requirement for local public service television to be fully recognised as part of PSB. Various models have been floated over the last two years one of which is that local public service television licenses should be held by social rather than commercial enterprises, involving commercial suppliers and public bodies at arms length. This will help identify use of the Television Licence Fee contribution to support transmission and core local public service programmes.

4. *Do you agree that any funding within a contained contestable element of the television licence fee not required for impartial news should potentially be available to fund other forms of essential public service content, or should such funding be limited to news?*

Yes, there could be other types of PSB content deserving of funding, though news comes top of the list. In a recent online survey carried out by the South of Scotland TV working group, 98.6% of respondents wanted to see news on local TV, 86.7% wanted to see programmes on local events and festivals and 85.3% wanted features on local life eg sports (not just soccer), farming. Interestingly, 73% asked for programmes that included public information on eg health, emergency services.

5. *Are there alternative funding mechanisms that you believe would deliver the above objectives more effectively?*

In the present economic climate a secure source of public (or publicly consolidated) fund is necessary as an on-going support for 'local and nation news and core public service programmes'. What is less clear is a coherent rationale in support of 'regional' programmes on the Channel 3 scale, not least in Scotland regional commercial TV and BBC nation TV are of different scales and public support is for 'local' not 'regional' TV.

6. *Do you agree with the proposal to set a maximum percentage of Television Licence Fee revenue which could be set aside as a contained contestable element?*

Yes. In Germany the percentage set aside for local public purposes for community and citizen broadcasting has been 2%. This has been allocated to communication departments in each Lande for distribution according to local priorities.

7. *Do you agree that amending the BBC Agreement could provide the necessary protection to the BBC's future funding and independence?*

The proposal to amend the BBC Agreement in favour of securing a maximum percentage for other public service broadcasting will not of itself secure the BBC's future funding or its independence. To achieve this the proposal might best be part of a broader package of agreements that provide the BBC and the proposed beneficiaries of this Agreement with long term security of income pegged to inflation. While the BBC is a world-beating institution that continues to lead the way in content development and delivery we believe that in order to continue this it needs sufficient confidence in future revenue levels. In the current UK market setting aside a maximum percentage of the Television Licence Fee should safeguard this role while encouraging innovation at a smaller and locally engaging scale.

8. *Do you agree that the use of any contained contestable element within the Television Licence Fee should be restricted to the public purposes set out in the BBC Charter?*

The better approach would be to uphold the aspirations for local public purpose identified by Ofcom in its 2005 *Digital Local*. By extension the introduction of local public service television meeting these public objectives should be formally recognised as the third tier of public service broadcasting as noted in Ian Stewart MP's EDM 1013.

Drafted with and approved by colleagues from the South of Scotland Alliance, Dumfries & Galloway and Scottish Borders councils

Additional assessment of STV's new micro region and national news proposals as announced on 18/09/09

While STV's national news plan for Scotland is easily understood its local or micro services will not be local at all. Scotland's main TV transmitters are listed below together with coverage. The figures are taken from Table 3. Predicted Gross Coverage from 80 6Mux Sites and can be found in *Predicted coverage of public service and commercial digital television multiplexes following switchover*, Ofcom, 8 February 2007, <http://www.ofcom.org.uk/tv/ifi/tech/dttcoverage/>

Transmission Site	Gross Coverage PSB 1000s Households	STV Micro-Region	New Micro-Region
Angus	408	STV Dundee	STV Dundee
Black Hill	1,345	STV Glasgow	STV Glasgow
Caldbeck	145	ITV Border/Tyne	STV 'South'
Craigkelly	645	STV Edinburgh	STV Edinburgh
Darvel	511	STV Glasgow	STV Glasgow
Durriss	297	STV Aberdeen	STV Aberdeen
Eitshal	11	STV Aberdeen	STV 'North'
Keelylang Hill	14	STV Aberdeen	STV 'North'
Knockmore	56	STV Aberdeen	STV 'North'/Aberdeen
Rosemarkie	69	STV Aberdeen	STV 'North'/Aberdeen
Torosay	8	STV Aberdeen	STV 'North'
Selkirk	36	ITV Border/Tyne	STV 'South'

In preparation for the Independently Funded News Consortium pilot, STV has proposed (Rob Woodward, *Broadcast*, 18/09/09) to split the STV Aberdeen micro-region in two. In addition, and subject to acceptance by ITV plc, STV has expressed the STV wish to adopt the ITV Scottish Border area for news so that together Scotland can be offered an hour long national news programme and a more localised news opt-out from six instead of the present four micro-regions.

While the national news option satisfies a recognised public demand, the new micro-regions continue to deny the character of localisation surveys show is required from public service television.

Micro regions – new and old

The largest portion of the Scottish population is served from just one transmitter located in Central Scotland at Black Hill – reaching 44% of households. The balance of Scottish homes are served by the remaining 12/13 transmitters (see below).

The local TV proposals made by the Scottish Local TV Federation from February 2008 follow an extensive consultation with local authorities and others at Ofcom's request and offer a technically better as well as wanted local solution to match the scale and accountability of local TV news, while serving well local commercial ambitions as well as public service goals.

The Federation proposals have involved local newspapers/groups in determining a sixteen station local TV model that corresponds to the coverage and engagement of local weekly and rural as well as daily and urban/evening newspapers typically working within local authority boundaries. The proposals provide an opportunity for the delivery of a range of local services (on TV and supplemented on broadband) by public, educational and community as well as commercial partners.

The Scottish Local TV Federation plans have been supported by Scottish Enterprise and submitted to Ofcom and government via regulator consultations and responses to *Digital Britain* over the last fifteen months. They have the support of individual MPs, MSPs and cross-party parliamentary groups, of local government and local newspaper groups drawn from across Scotland.

Commercial opportunities for local media are local and on TV can be secured with access to broadcast spectrum released at digital switchover. The Federation approach builds a local TV news base where there is a commercial incentive as an alternative to the limited commercial opportunity surrounding news in the restricted access to Channel 3 airtime.

On Channel 3 there will be little or no commercial incentive for local papers to underpin contributions to TV news alongside their own broadband services. Those local papers outside the urban centres – or in Scotland's case outside the artificial STV Glasgow micro-region 'conurbation' – are unlikely to sustain the training in production on the off-chance they might access national news while contributing sometimes to an inflated micro-regional opt-out that is in virtually all cases far larger than their own newspaper coverage area. There is no synergy in STV's plan.

In fact, any benefit to newspapers in STV's proposal lies in excluding the more local or 'rural' titles including (sometimes) their own localised brands!

Financial support for a new nation, region and local television news that will support the bigger urban titles at the expense of the rural papers will serve to undermine the PSB objective and not address integrated local public media flagged by *Digital Britain*.

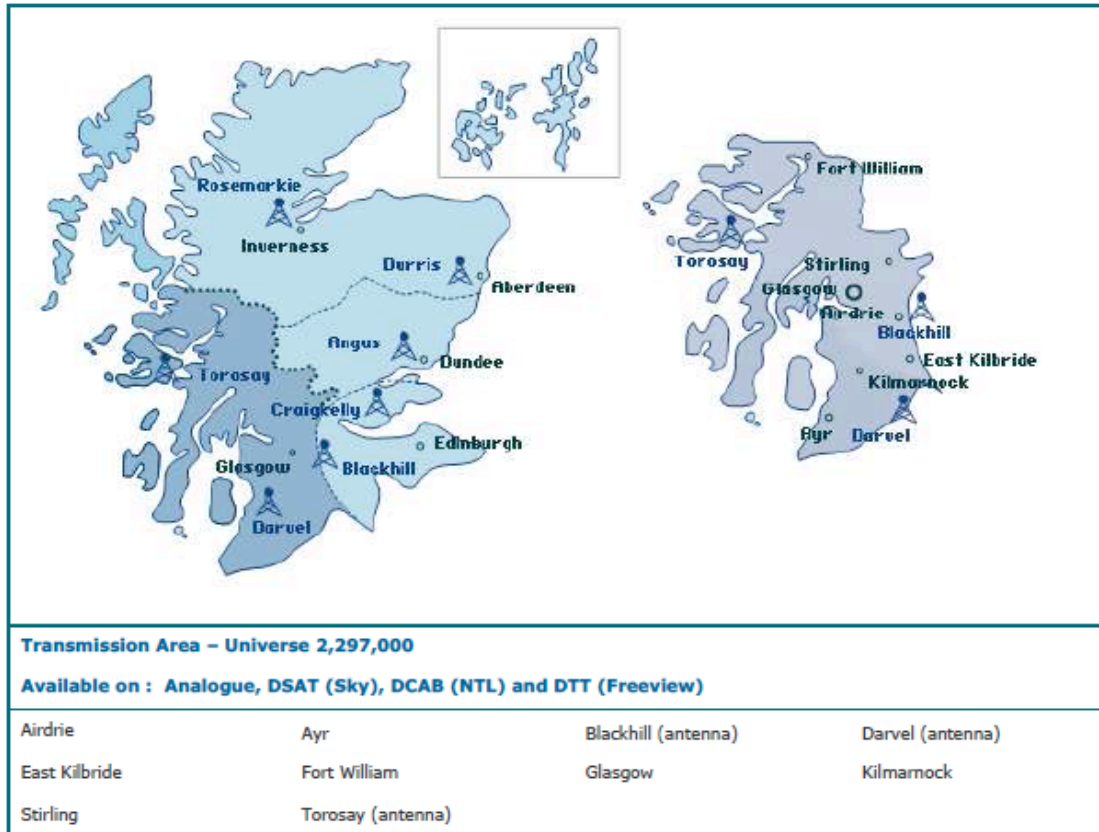
The better option for Scotland is to offer a combined local as well national news service that utilises the full twenty four hour access available on the 'seventh mux' spectrum from switchover and provides up-stream stories for the more limited access offered by Channel 3 news slots.

The aggregated news gathering of a genuine 'local' local public media outlet supporting the base of a national news on local commercial grounds to secure in depth the public service that viewers in Scotland have demanded. The local element

offers round the clock access to local advertising minutes that local papers can consolidate and identify for their readers.

The Federation’s proposal encourages local stories to serve local viewers within each newspaper’s readership area to ensure a sustainable quality contribution is on-hand for national news in addition to other (local) programming. The proposal offers news at an appropriate scale and source in which there is a genuine public interest.

**STV PROPOSALS AND EXPECTED MICRO COVERAGE
STV GLASGOW¹**



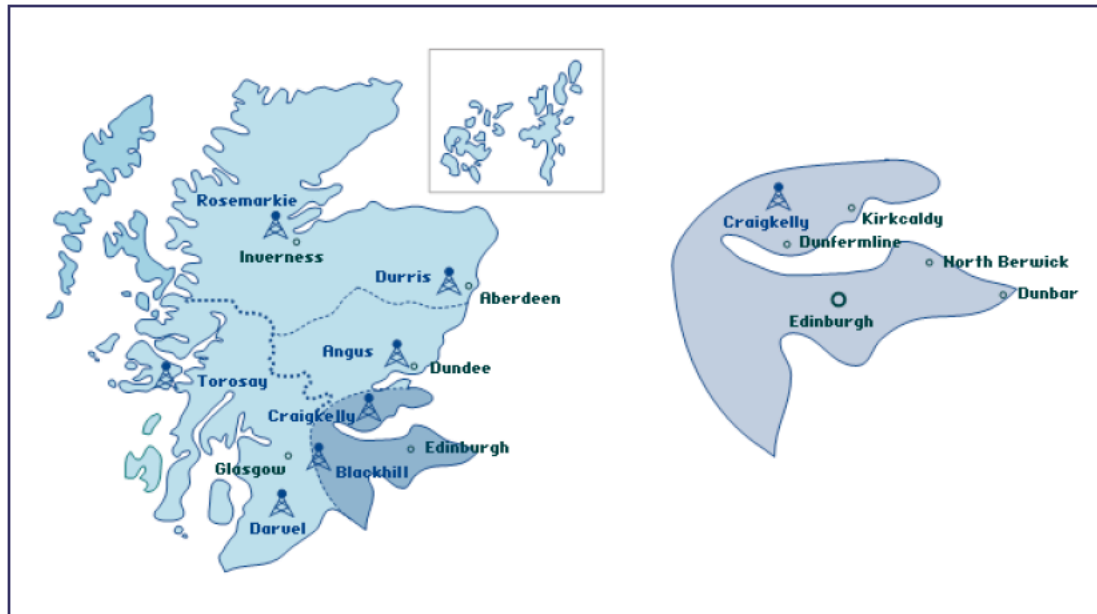
The STV sales maps are misleading because they gloss over the reception difficulties of ‘local’ transmitters.

For example, a large minority of the Edinburgh population is reached by the STV Glasgow micro opt-out. As a whole, the STV Glasgow micro region reaches 45% of the total Scottish population – aggregating to one service several distinctive ‘locals’.

The massive difference in population accessed means that in effect there is the Glasgow micro and the rest of Scotland. The STV proposals (as announced on 18/09/09) do not address the overwhelming centralisation of TV news and TV programming to Glasgow – over 90% of Scotland’s provision from Glasgow itself.

¹ Maps from STV Rate-card, <http://www.stvsales.tv/content/popupFlash.asp?RegionID=gn>

STV EDINBURGH



Transmission Area – Universe 573,000

Available on : Analogue, DSAT (Sky), DCAB (Telewest) and DTT (Freeview)

Bathgate	Craigkelly (antenna)	Dunbar	Dunfermline
Kirkcaldy	Lanark	Kirkcaldy	North Berwick

The Craigkelly transmitter serves part though not all of Fife. The STV Edinburgh micro region serves 11% of the Scottish population

STV DUNDEE



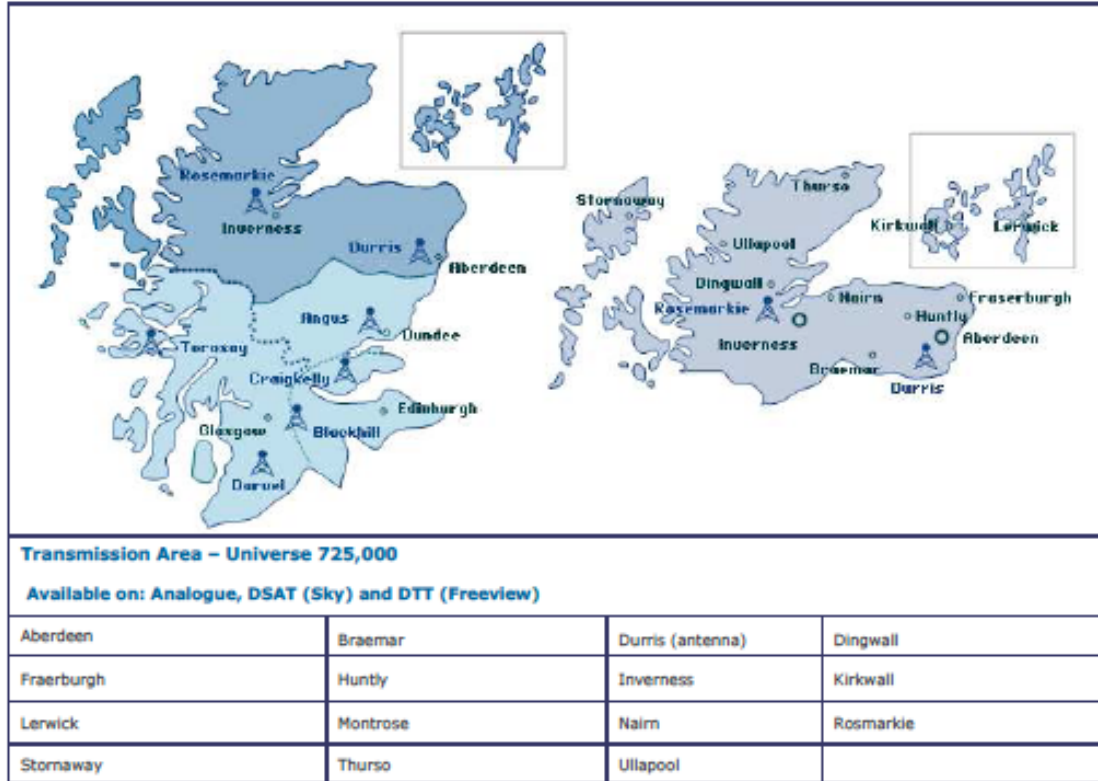
Transmission Area – Universe 257,000

Available on: Analogue, Freeview (DTT)

Angus (antenna)	Arbroath	Brechin	Dundee
Forfar	Perth	Pitlochry	St Andrews

The Angus transmitter and relays serves parts of Angus, Dundee, parts of Perth & Kinross and parts of Fife. The STV Dundee micro region reaches 5% of the Scottish population

STV ABERDEEN



STV propose to split this micro-region although it remains unclear whether Rosemarkie – serving Moray & Nairn would be part of ‘Aberdeen’ or the new ‘North’ micro.

Currently the STV Aberdeen micro region serves 14% of the Scottish population.

DR 20/09/09