

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	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment (max. 4000 characters)

We welcome the government's commitment to maintaining plurality in the provision of high-quality, impartial news. At the same time, it is essential that the future funding of the BBC, and its independence from commercial and political pressure, are protected. For this reason, we are firmly opposed to the use of the licence fee to fund the provision of news beyond the BBC. Plurality should be secured on the basis of an alternative and clearly separate source of revenue.

A key role for government is to maintain, nurture, and strengthen the media space dedicated to civically-relevant content. Given that there can only ever be a certain amount of funding to support such space, it is vital that this is used to support trusted, accountable, and civically-committed media organizations. On the basis of our research, we acknowledge the BBC's unique contribution to democratic citizenship and the importance of maintaining at full strength the BBC's span across media and communities.

In today's changing, more competitive and more fragmented media ecology, the provision of civically relevant content is more challenging (because costly and having to vie for audience attention against many other offerings), and it is also therefore becoming more, not less important to have an institution with the resources to gather, disseminate, and explain (not merely report) aspects of news and information both nationally and locally.

The BBC's commitment to using digital media as new platforms for public conversation and debate is to be welcomed. In a changing media ecology, characterized by interactive communication, the role of news providers as trusted democratic intermediaries as well as knowledge providers is going to be more vital than ever. As two of us have argued in a recently-published book, there is a pressing democratic need for the establishment of an online democratic space in which the dispersed energies, self-articulations, and aspirations of citizens can be rehearsed, in public, within a process of ongoing feedback to the various levels and centres of governance. (Stephen Coleman and Jay G. Blumler, *The Internet and Democratic Citizenship: Theory, Practice and Policy*, Cambridge University Press, 2009)

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	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

Comment (max. 4000 characters)

There is reason to be sceptical of current claims made by commercial broadcasters about the speed and severity of the decline in commercial terrestrial broadcasting. However, we acknowledge a lack of funding and the chronic problem of market failure in this area. Public

intervention is required in order to ensure that there are sustainable sources of high quality, impartial news, but this should not be pursued in an imprudent way that threatens the strengths of our media system.

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	
No	✓

Comment (max. 4000 characters)

We are firmly opposed to the use of the licence fee to support services beyond the BBC. Breaking the link between the BBC and the licence fee is likely to reduce public confidence and mean that that the licence fee is perceived as a general form of taxation like any other. Despite current assurances, top slicing the licence fee sets a dangerous precedent, opening the door for governments to undermine the licence fee further in future. We believe that the government's proposal clearly puts the BBC's future funding and independence at risk.

Paragraph 21 of the consultation document states that: 'The Government recognizes that this [the top slicing of the licence fee] is a departure from current practice whereby the BBC has been the sole recipient of the Television Licence Fee, but it must be a key option in the absence of other solutions'. We question the assumption that no other funding options are available to the government. As discussed further below, we urge the government to consider the use of industry levies in particular (see Q5).

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	
No	

Comment (max. 4000 characters)

See above (Q3).

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

Yes	✓
No	

Comment (max. 4000 characters)

Rather than use the licence fee, it is crucial that plurality be secured on the basis of an alternative and clearly separate source of revenue (see Q5). To complement advertising revenue, we favour the greatest possible exploitation of regulatory assets. We also believe that the government should consider industry levies, especially levies on sections of the media industry that are gaining most from current changes in the media market.

A recent IPPR report, 'Minding the Funding Gap', sets out the case for industry levies. The report describes a number of different forms of levy that would provide an effective and secure means of funding public service media. Levies could be set on recording equipment or blank media, the retransmission of content by cable and satellite platforms, direct media and new media. Such levies are widely used by governments in Europe and elsewhere and are a sustainable and effective funding mechanism. We note that the report estimates that a 1 per cent levy on subscription-based TV services would generate approximately £70 million per annum and that a 1 per cent levy on the five major mobile phone operators in the UK (O2, Orange, T-Mobile, 3 and Vodafone) would generate approximately £208 million per annum. We urge the government to consider the possibility of industry levies seriously and to commission further research in this area.

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	
No	✓

Comment (max. 4000 characters)

As stated above (Qs 3 & 5), we are opposed to the use of the licence fee and believe that alternative funding options are available to the government.

More generally, and while we are not opposed to contestability as such, we would question any tendency to define public service media merely in terms of certain types of desirable content. We urge the government and the regulator to keep in mind the significant (if hard to quantitatively measure) political and cultural advantages of trusted and independent public service media institutions.

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

Yes	
No	✓

Comment (max. 4000 characters)

As we have argued above, we emphatically do not believe that this will provide an adequate safeguard. The best way to guarantee the BBC's future funding and independence is to

maintain the link between the BBC and the licence fee.

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?

Yes	
No	

Comment (max. 4000 characters)

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