

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	Yes
No	

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	NO

Comment (max. 4000 characters)

Audience research over decades shows a strong and clear understanding on the part of the British public that, irrespective of any legal matters, the licence fee is understood as paying for the BBC and the BBC alone.

For the government to break trust with the public on so important a matter would be a disaster for the BBC (and for trust in government!). Whatever it says in law, people have paid this money to the BBC for the BBC; to take the money for anything else would be an abuse of trust.

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	NO

Comment (max. 4000 characters)

Most responses to this consultation will, rightly, focus on funding prospects for news. In what follows, I focus on the implications for children's broadcasting.

1. The consultation states (para 5): The priority for the Government is to focus on what is essential, and for most people it is news. For a significant, but smaller group, plural provision of original UK content for children, particularly older children who are under-served by the market, is also seen as important.

Comment – the question is not for how many people children's content is important but, by contrast, whether it is actually important. Research repeatedly shows that it is – for their development, well being, self-esteem, cultural understanding and communication rights.

When you state 'people' or 'most people' in the above, I assume you do not take the views of children themselves into account. There are 11 million children in this country and their views must also be heard. They are, in short, people, and should not be omitted from assessments based on the volume of voices advocating a particular view.

It also states (para 20): This element would be used primarily to top-up fund independent,

alternative providers of news (the IFNCs). However it could also potentially be used to sustain other essential public service content priorities (e.g. the provision of plural original content for children) if the independent provision of Nations, local and regional news should require less than the contestable sum set aside.

Comment: while I completely agree that the market has failed to deliver high quality content, especially UK-originated content across multiple genres, for children, especially older children, it seems extraordinary that you might propose to deal with this through a system of leftovers.

First, the chance of left over sums occurring is negligible. Second, the idea of leaving children's quality content to chance is bizarre. Third, investment in children's media is already disproportionately low.

- As reported in Ofcom's *The Future of Children's Television Programming* (2007, p.47), children's television accounts for 4% of original programme spend – contrast this with the fact that they are 15% of the UK population.
- The same Ofcom report also documents that 'spend on first-run original programming by the commercial PSB's halved in real terms from 1998-2006' and it has fallen further since. Children's programmes are distinctively neglected it seems: as Ofcom further states (p.47): 'Between 2001 and 2006, total investment in UK original programming increased by 4%... while investment in UK original programming for children declined by 17%', and that from an already low base.

Academic research (reviewed recently in Livingstone, S. (2008) On the future of children's television – a matter of crisis? In T. Gardam and D. Levy (Eds.), *The Price of Plurality: Choice, Diversity and Broadcasting Institutions in the Digital Age* (175-182). Reuters Institute/Ofcom.) shows that:

- Children and parents greatly value programming that represents people like them (with their accents, living as they do, facing the challenges they do), which is not to say they want homogeneity, quite the contrary: they wish to see the diversity of their nation fairly represented.
- They also value and enjoy seeing other cultures represented in their diversity (which is not to welcome a disproportionate representation of one large country only).
- Researchers and educators are clear that children learn through high quality, creative, demanding, interesting and relevant programming. They need and deserve this opportunity.

Ofcom's research shows that children are voting with their feet – despite a plethora of channels largely (though not only) showing imported cartoons, they watch drama and factual programming in greater proportions than it is provided for them (ie though these account for only 12% and 5% of output respectively, they account for 19% and 7% of viewing). Children would watch more, it seems clear, if this were provided.

The almost complete neglect of provision for those aged between 11 and 14, even from the BBC, contrasts strongly with widespread dismay (often unfair, generally amplified by tabloid panics) at the supposed behaviour of teenagers in other walks of life. If society values these young people – with their present rights and future citizen status – it should provide for them.

Not just one news programme, but a choice. Not just the occasional drama programme if you can find it, but a choice. And though it is true that young people are embracing online media, they have not by any means left behind television, and continue to watch it not only online but on ordinary televisions in their living rooms and bedrooms across the country.

There are no grounds in the above to cut the resources of or provision from the BBC. But there is, I suggest, ample grounds to increase the resources and provision for children from additional public or other sources.

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

Yes	Yes
No	

Comment (max. 4000 characters)

There are various other solutions on the table, from tax breaks to levies to mergers (eg Worldwide and C4). Although there may be 'feeling' against the former two, I have not seen an argued case as to why these cannot be pursued and am astonished at the lack of transparent engagement with strategies so clearly successfully practiced in certain other countries.

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	No

Comment (max. 4000 characters)

The public, who pays this money, has little idea what is a contained or contestable element.

Any future government would surely be at liberty to alter the maximum so setting a maximum has no force. Once the licence fee has been plundered, what would stop this happening again?

What does the public think? I gather DCMS has conducted a survey to find out. In the interests of transparency and accountability, the actual questions asked and percentages obtained must be published in advance of this consultation's closing date.

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

Yes	
No	No

Comment (max. 4000 characters)

A future government could simply amend it again once the basic principle of paying the licence fee to the BBC has been undermined.

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	Yes
No	

Comment (max. 4000 characters)

As argued above.