

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	Y
No	

Comment (max. 4000 characters)

It is vital for the democratic function performed by all broadcast media outlets in the three sectors (public service, commercial and community), that there is plurality in the delivery of news and current affairs. Dominance or exclusivity in the delivery of news content would restrict the airing of differing opinions on particular news items. It would also lead to a reduction in the amount of different news stories reported and this would be most severe with local, regional and community based news coverage.

Therefore, in supporting plurality of source and provision we would strongly disagree that the Independently Funded News Consortia is an appropriate model. Indeed we feel that this model is likely to restrict plurality of provision and encourage consolidation amongst large commercial providers, excluding both community media providers and small wholly independent commercial providers who do not form part of larger networks. We also feel that this model would favour traditional providers and restrict new entrant from participating in news provision.

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	
No	N

Comment (max. 4000 characters)

It depends. If the licence fee over which the BBC currently retains a monopoly remains then yes public money would be required to support impartial news amongst commercial and community broadcasters, however if the licence fee is top sliced to provide funding for licensed broadcasters outside of the BBC to provide such impartial news content then there is no reason to believe at this point that additional public resources would be required. Any fund, whether it results from the public purse or a top slice of the licence fee, must be independently administered. Such a body would have to be independent of both government and sectoral industry interests so that applications can be fairly assessed in the public interest of ensuring plurality. In addition, we would argue that any fund should be divided between the Nations so that it is fairly apportioned across the population and to ensure multiple providers in each of the Nations regions.

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	Y
No	

Comment (max. 4000 characters)

Most definitely. The primary purpose of the licence fee should be to support public service broadcasting from whatever sector that emanates - BBC, Commercial or Community. The majority of Community Radio stations, for example, currently provide local news and/or current affairs coverage but struggle to do so in the absence of appropriate and adequate funding. As a result, many stations are now opting to take in a sustaining service of national news from IRN (Independent Radio News) provided by Sky. This both reduces the number of sources of news and reduces the potential of news reporting at the micro-community level for which there is a considerable appetite amongst the public.

The retention of the BBCs monopoly on the licence fee will only lead to continuing disgraceful wastage of limited resources such as was evidenced by the BBC spending over £406,000 on bottled water in a single year. Compare this with £500,000 of funding for the entire community radio sector spread across over 200 stations.

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	Y
No	

Comment (max. 4000 characters)

Funding should not just be limited to news. We believe that an element of the licence fee should be available to fund a variety of public service content in addition to news provision. A working example of how this can be successfully achieved, without detriment to the BBCs output is the Sound & Vision Fund administered by the Broadcasting Commission of Ireland which is funded from a top-slice of the licence fee in the Republic of Ireland. This is a most successful model in promoting public service content provision outside of the State Broadcaster (RTE) and creates welcome and necessary competition within the public service content sector. This model has also contributed greatly to a vibrant community media sector in the Republic of Ireland and we believe the same could be achieved with the UK.

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

Yes	
No	N

Comment (max. 4000 characters)

We believe that at a time when public spending is under pressure we do not feel that it would be acceptable to add to this burden. Accordingly, we feel that the best mechanism is via a top slice of the licence fee at least for a trial period. If it proves unsuccessful or that it proves to have a significant detriment on the BBCs ability to maintain public service broadcasting then the decision can always be reversed. We would propose a pilot 5 year period would be appropriate to gauge the benefit/detriment ratio.

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	Y
No	

Comment (max. 4000 characters)

It is important that the BBC is appropriately funded and that it should be able to budget accurately the funds that will be available to it. Accordingly, we would agree that a fixed percentage be set for a pilot period of 5 years and then reassessed. This should be the maximum and the minimum - ie. It should remain fixed for that trial period. Furthermore, in an attempt to bridge the funding gap in community radio, we believe that a fixed percentage within the fund should be set aside for community radio again for the trial period of 5 years and then reassessed.

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

Yes	Y
No	

Comment (max. 4000 characters)

Depending on the amendments that are proposed, we believe that these could be structured into the Agreement to provide the required protection.

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	Y
No	

Comment (max. 4000 characters)

We do believe that the public service purposes for which the licence fee is payable should be maintained and that the licence fee should be used exclusively for these purposes but we disagree that the BBC is the only body which can fulfil these purposes. We believe that the Community Media and Commercial Media sectors can and do provide these public purposes and there can be little argument that the licence fee should continue to be exclusively reserved for one organisation fulfilling these purposes.

We also believe that in the context of broadening access to the licence fee that a wide consultation on the definition of public purposes should be reviewed to ensure that these are consistent with the needs of modern society.