

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	X
No	

Comment (max. 4000 characters)

UTV agree that securing plural sources of impartial news should be a key priority. It is especially important in the devolved nations where coverage from UK-wide news organisations is often minimal and the only real analysis of the working of devolved government is through locally based newsrooms. It is important however to recognise that impartial news is currently provided only by broadcasters. Local newspapers are not impartial. News provision for the nations and regions risks being damaged if partial and impartial news organisations are obliged to work together.

Public trust for news provision from broadcasters is high and the output is valued. This could be damaged if partnerships are forced with companies that are not impartial. This is especially true in Northern Ireland where the majority of newspapers are seen to be aligned to one community or the other.

Indeed UTV has worked very hard to deliver cross platform news. No other Channel 3 licence holder delivers news on television, on radio and on-line. This should be a model moving forward and effort should be put into how to make this model sustainable across the whole of the United Kingdom as the UTV newsroom has the highest satisfaction rating (according to Ofcom) of any regional broadcaster.

UTV would make it clear to DCMS that the business conditions under which we operate do not require a trial to be set up in Northern Ireland. While we cannot forecast the business conditions from around the time of our licence renewal in 2014, we are confident that news supply is commercially sustainable until the proposed full roll-out of INFC's across the United Kingdom.

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	X
No	

Comment (max. 4000 characters)

UTV has always said that news provision should be delivered without public funding, but that non-news provision cannot continue without intervention. In Northern Ireland this point will not be reached before the end of UTV's current Channel 3 licence in 2014. It appears that the debate around non-news funding has gone quiet, therefore UTV has to accept that if funding is not forth coming for non-news output, then funding will be required for news provision.

This is especially true if the scale of IFNC delivery is as wide as the Government indicate. Cross platform and multi platform news provision will mean that the granularity of the service will be of such a scale that there will be no commercial model that will fully sustain this type of delivery.

UTV believes that this could be counterproductive in the devolved nations as we believe the audience want accountability on a scale large enough to offer serious and detail debate and analysis of the workings of the devolved institutions. City or county models would struggle to provide this. While we understand the potential dissatisfaction of the current ITV regional service in some parts of England and Wales, we believe that the current service offered by UTV in Northern Ireland (and we believe stv is Scotland) is valued by our audience.

Indeed we cover Northern Ireland effectively and give any major story detailed coverage. We do not receive criticism for "not being local enough". UTV suspects if we did cover more grass-roots news, we would be considered "parochial" by our audience. This would be counterproductive.

Indeed we have recently undertaken an informal consultation with key politicians, business leaders and opinion formers. We have asked during these conversations if UTV could provide any further news services to our audience. Since the launch of the new late news (30mins at 22.30 from Monday to Thursday), our audience say UTV provides all the news service they need and have not asked for an increase in the localness of our service.

It is important also to note here that intervention may only be required because it is close to impossible to develop a commercial market for online news provision as the BBC online service is so well resources and all encompassing. We would urge very strongly the DCMS to look at ring-fencing the BBC online activities which are being funded by the Television Licence Fee. We believe this one intervention in the market, by limiting the BBC's editorial land-grab, would also assist newspapers in the nations and regions to developed either ad funded free models, or micro-payment models.

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)

While UTV suggested other funding mechanisms in our response to Digital Britain interim report, we accept that in the short to medium term the Television Licence Fee could support impartial news in the nations and regions. We believe that the licence fee will require a fundamental review at the next settlement period as online viewing and the BBC's remit is already an area of significant debate. In time we believe the licence fee will become untenable and when that happens the funding of plural news provision will yet again come under serious pressure.

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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)

We believe that the 3.5% suggested as the contained contestable element of the licence fee is already far less funding in real terms than the BBC has for cross platform delivery of news in the nations and regions. Therefore UTV would struggle to see how there may be any of the fee that would be "not required" for news provision. However if there is funding remaining after providers have delivered on their qualitative and quantitative news requirements, UTV see no reason why the surplus funding could not be used to deliver other forms of essential public service content.

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

Yes	X
No	

Comment (max. 4000 characters)

As we stated in our submission to the Digital Britain consultation, we believe that a digital levy could be introduced to deliver the objectives of a high quality plural news service more efficiently.

Steve Morrison, CEO of All3Media, made a very persuasive argument at a presentation he made on 10 September 2008 at the London School of Economics as to how indirect taxation, commonly used in a number of European countries and levied against storage media and hardware plus some audiovisual equipment could fund broadcasting. We strongly suggest the data he produced for this presentation be studied by the DCMS Digital Britain Team.

During this review the former Minister in charge of the Digital Britain Report regularly made it clear that original thought is required to deliver PSB content moving forward. We urge DCMS to adopt this very thinking when shaping future legislation. This levy is a sustainable and relevant mechanism for funding future PSB provision.

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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)

It is not a matter of agreeing to a maximum percentage of revenue to set aside from the licence fee. It is vital to ensure that the BBC do not use the licence fee that remains available for their own purpose for objectives that could damage commercial operators. The recent BBC agreement with a number of national newspapers to share video content damages commercial models and is likely to mean that a greater share of licence fee may be required by alternative providers than would be needed if the BBC's remit was consistent so as to avoid damaging commercial models.

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

Yes	
No	X

Comment (max. 4000 characters)

This is too simplistic a question. The BBC is already under immense external pressure. As soon as money is "taken" from the BBC for other purposes, then this will open the BBC up for further scrutiny. (We understand the DCMS statements about Television Licence Fee v BBC Licence Fee, but do not believe this delineation is made in the mind of the public in general)

For instance, in Northern Ireland UTV produce news programming which according to BARB figures is more watched than the BBC, according to Ofcom research is more trusted than the BBC, according to Ofcom research is more effective at covering breaking news than the BBC, and according to ITV research as a high audience appreciation than the BBC. We deliver this for a figure many millions of pounds cheaper than the BBC.

Changing the BBC Agreement will not change this situation and will not protect the BBC from persistent undermining once the Television Licence Fee is shared.

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	X
No	

Comment (max. 4000 characters)

UTV believes that the public purposes set out in the BBC Charter are a very good starting point for the conditions under which Licence Fee money could be distributed to other parties to provide either news in the nations and regions, or indeed other essential public service content. This is not dissimilar to the Ofcom definition of Public Service Content which also could be used to define the use of any contained contestable element.