

Putting Viewers First
- Ofcom's 2nd Public Service Broadcasting Review
and
Digital Britain, The Interim report

Response by the Institute of Welsh Affairs

1. We welcome many parts of both Ofcom's final report on its review of public service broadcasting and Lord Carter's Interim report on Digital Britain.

News services

2. We note that both documents recognise that the case for securing an alternative news service to the BBC within Wales has been made, and that this can be secured by a combination of partnership arrangements between broadcasters and possible third parties, and additional public funding.
3. Partnership arrangements alone will not be enough to secure the quality of news service that Wales needs to serve the developing Welsh polity.
4. The uncertainty surrounding the future of ITV as well as ITV Wales's position as a cost centre within ITV plc, leads us to believe that the best way of securing the news service is through an open contestable process, with ITV simply guaranteeing the slots for transmission. This would provide for much greater transparency. Such a process could also be applied to a wider range of programmes.

General programming

5. We regret that both documents have created a false hierarchy between news and general programming made for the Welsh audience. News programming is not the only necessary, or even the truest reflection of our society, given the fundamental changes in the Welsh polity that have come about in the last decade.
6. Pluralism is not defined simply by securing two suppliers. The object of pluralism in broadcasting is to guarantee a range of expression. That is done not only by having more than one supplier, but also by guaranteeing a variety of programme form and purpose.
7. Even within the journalistic function greater range of expression is guaranteed by the existence, parallel with television news, of well-resourced current affairs programmes and well-resourced radio journalism than by merely proliferating television news programmes – programmes that can too often seem cloned.
8. True pluralism of expression expands exponentially if it is extended beyond journalism to dramatists, documentary makers, comedians, satirists and artists of

all kinds.

9. Public support for this wider kind of pluralism is also necessary to ensure a more equitable dispensation for both the Welsh-speaking and majority anglophone audience in Wales. No arrangements for news provision should be agreed that would have any direct or indirect effect on either Welsh language or English language general programming.
10. We support the view of the Welsh Assembly Government's Broadcasting Advisory Group about the importance of enlarging the volume and range of general programming in the English language in Wales. We agree with its conclusion that "the current English language provision in these areas is not a defensible provision for a developed national community that brings to the table the sort of cultural legacy that Wales commands." Even the current inadequate provision is threatened both by ITV's withdrawal and from regional programming and financial cuts at BBC Wales.

Funding

11. Within the totality of funding – public funding and advertising – for public service channels across the UK, which now amounts to not far short of £3bn., we do not believe that the funding support sought by the Assembly Government – c. £50m – is an unreasonable amount to counter-balance the culturally homogenous dozen or so channels provided by the four UK public service television broadcasters.

Governance

12. We support proposals put forward both by the Assembly Government and by Ofcom's own Advisory Council for Wales for the establishment of a Wales Media Commission. We would, however, go one stage further. We believe that such a commission should operate on a bilingual and multi-media basis, allowing for contestable funding across the whole range of media activity outside the BBC. It would subsume the S4C Authority.
13. We believe that this approach would be in line with the Assembly Government's policies on bilingualism, would avoid duplicating functions, would provide a critical mass of expertise within one organisation, and be an economical and flexible way of managing media development in Wales in a period of technological change. It would also allow for a holistic approach to the needs of both linguistic communities within Wales.
14. This need not jeopardise in any way the Welsh language service on S4C. The channel's programme funding could still be ring-fenced, even while providing a healthier separation of the management of the channel from the S4C Authority's regulatory functions.
15. The establishment of such a commission would give Wales a much stronger decision-making capacity in the media field while still operating within a UK framework.

Radio

16. We are yet to be convinced that conditions can be created that would justify the migration of all radio in Wales to DAB. There is a need for a review of radio in Wales that takes full account of our topography, as well as the small scale and fragmented nature of the Welsh market. Successive reviews of the radio scene at the UK level have so far failed to do this.

Broadband

17. We welcome the proposal in the Digital Britain report for the creation of a universal service obligation for broadband delivery. While recognising that the universal provision of a 2Mbs service may be practical starting point, we note that the report foresees that much faster speeds will be essential to preserve the UK's competitiveness. In that context the competitiveness of all parts of the UK must be secured as technology develops.

IWA
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