



Response to
DIGITAL BRITAIN
Interim Report

March 2009

Prepared on behalf of RIG by Neil Gardner, Chair

www.radioindies.org

SUMMARY

The independent radio production sector will soon be 15 years old, and in that time it has grown from a handful of companies and freelancers, into a vibrant and forward-looking industry.

We are fully aware that new and converging delivery platforms require new ways of thinking and working on the part of content producers. Radio independents have been at the cutting edge of radio and audio development, many of the companies pioneering digital services (e.g. text-based programming, online radio, DAB, interactive radio).

Over the next 15 years, with some intervention and support from the Government, RIG is confident that the sector can continue to grow; to be a source of employment, training and development for the audio arts in the UK; and to bring money in to UK plc through a combination of the sale of content via online services, international sales, and the development of cross-platform formats.

To achieve these aims, there are barriers to be dismantled, and RIG hopes that the Digital Britain process will be a way in which policies can be enacted that will help with this. Digital Britain must succeed in involving all UK content creators fully in the continuing evolution and convergence of the communications industries. There is already in place a successful and motivated, experienced and prepared industry waiting to take advantage of any new or enlarged markets which the Government can create through the Digital Britain programme.

In the following response we outline areas of interest to the sector; concerns and opportunities; and ways in which RIG and our members can be of help and service. Radio independents are an important part of the UK's digital broadcasting - Digital Britain is a key opportunity for the Government to recognise that importance, and build into its vision and policy going forward systems and processes which will enable the sector to fulfil its potential alongside the other creative industries of the UK. RIG asks that our concerns be heard, our issues debated, and that the Government decide that now is the time to finally support a sustainable strategy for the future of the UK's independent radio & audio producers.

INTRODUCTION

About RIG

The Radio Independents Group (RIG) is the trade body representing the interests of the independent radio and audio production companies of the UK. RIG provides centralised resources that benefit both its 90 member companies and the wider sector as a whole. Services include: negotiating Terms of Trade with the BBC and commercial radio bodies; representing the sector's interests in conversations with government, parliament and regulators; discounted Legal, Insurance and Health & Safety providers; a database of technical and editorial resources; an Executive Producer list; online resources; regular symposia and events targeting training and skills development; and links with other trade bodies (e.g. Radio Academy, Radio Centre, PACT, BECTU).

Since being formed in 2004, RIG has successfully negotiated the BBC Terms of Trade, changes to compliance and editorial standards requirements; World Service Terms of Trade; BBC Worldwide Terms of Trade and BFBS Usage Agreements. RIG has also contributed to the wider radio world through industry events such as the annual Radio Festival and sponsoring the Student Radio Awards.

RIG is fully funded by its members, and its Board are all active independent radio producers running their own companies. Despite an absence of any major policy changes at government or regulatory level, RIG has nevertheless improved radically the communication and understanding between the BBC and the independent producers, as well as the gradual, albeit slow, increases in opportunities for commissioning that have so far taken place.

The UK Independent Radio and Audio Production Sector

The UK's independent radio production sector comprises approximately 150 companies, employing an estimated 2000 people. Spread across the length and breadth of the UK, these companies provide programming of all genres to the BBC and commercial radio broadcasters, as well as vital production services to local, regional and national (even multi-national) corporate clients.

The sector is responsible for over £13million worth of BBC radio commissions per year, win approximately a quarter of the annual Sony Radio Academy Awards (alongside many other notable awards including the New Yorkers, One World, Prix Italia and Third Coast Awards).

Independent radio producers locate and develop exciting new writing, presenting, acting, engineering and producing talent, and are enthusiastic, creative, passionate advocates for British radio.

PART 2 – RESPONSE TO EXECUTIVE SUMMARY (pgs 3-13)

Pg 2 – “More importantly, the digital economy underpins our whole economy and builds our national competitiveness.”

RIG believes that with competitiveness and economic growth at the heart of the Digital Britain report, it is imperative that the Government intervenes to help ensure that opportunities for competitive commissioning and placement of orders for digital, knowledge economy services are made available to UK independent radio producers.

The BBC is the majority commissioner of independently produced radio content, and while this work has been gratefully received by the producers, the amount has remained relatively stagnant for over 14 years, even though the number of professional external suppliers has risen significantly. Unlike BBC TV and Online, BBC Radio is under no obligation to commission from independent producers.

As a result, and despite the fact that independently produced programmes win a disproportionately large number of awards, the BBC reserves a very large percentage of its production for its in-house producers.

To bring the most benefit to the UK economy, in addition to fulfilling social and cultural objectives, innovation and creativity should be allowed to flourish within radio production. Some leading independent radio producers formerly worked at the BBC, and without greater opportunities to gain commissions, those currently within the BBC who would wish to follow in their footsteps are unable to do so.

Pg 5 – “In practice, this means content generated in the UK for UK consumers, and plural sources of informed, accurate and impartial news, as well as of informed comment and analysis. The market will always provide some of this content, but we need to decide what else we require, and make policy decisions to achieve that. What do we, as a society, expect and require, and what institutions and policies will best deliver it?”

In TV this is a much easier problem to solve, with a plurality of commissioners already in the field, and a strong commercial market for ideas and programming. In radio, the BBC controls the majority of commissioning. For this reason, alongside the report’s commitment to look at Terms of Trade, there is a need to also look at access to the process of commissioning for all the creative industries providing content to the BBC.

It is alarming to realise that although the BBC is the majority commissioner of independent radio production content, and therefore holds a crucial place in the market for the sector, there are no regulatory requirements for them to commission such content. This represents an enormous disparity between radio and TV & online independent production. A WOCC

system of 25% contestable commissions + 25% independent quota operates in TV, but not in

radio. BBC radio commissioning has stayed relatively static for nearly 15 years, and while the BBC has been taken to task over its role as a production house in TV and online, no such questions are asked of its radio operations.

Whilst we acknowledge that it is not good enough to simply employ ‘me too’ arguments, it is nonetheless logical to point out that to have a WOCC system for TV and Online, but not for radio, demonstrates inconsistent policymaking. The BBC operates a near-monopolistic protectionist policy of its in house radio production, despite there being ample proof of the ability of the independent production sector to deliver high-quality, award-winning, listener-focused, on budget productions year on year. In doing so the BBC is blocking the growth of a valuable part of the digital knowledge economy. RIG feels it is a key role for Digital Britain to recognise the importance of the growth of the sector and to incorporate policies, investment and systems to allow for more commissioning of independently produced content.

We would therefore like to see the Government require the BBC to operate a Window of Creative Competition (WOCC) amounting to 25% of its radio commissioning, underpinned by an additional minimum 25% quota for independent radio production. In addition it should look towards building new opportunities away from the BBC to help independent producers become more competitive and grow their industry. We would like this system be calculated by value as opposed to hours, to remove the exemptions caused by the current ‘eligible hours system’. Although the BBC has a voluntary 10% quota for independents, the exclusion of certain types of programming means the real amount of commissioning going to independents is likely to be around 6-7%.

Note we are not asking for large radio budget increases, but a redistribution of commissioning funds in order to spread the licence fee more widely among the UK’s creative industries, which are rightly held up to be a highly significant part of the country’s future economic well-being.

We would also like to see measures to ensure that all publicly-funded commissioning, eg by the COI, operates a commissioning system that offered genuine competition for commissions.

Pg 5 - Today, Britain has a range of institutions and interventions mostly designed for the analogue age. To date, only the BBC has the reach, the strategic and operational capability, and the funding to be a provider of such content at scale across the digital landscape. In this interim report, we examine the scope for other modern interventions that could provide for plural British digital content and the

possibility of a new organisation of the scale and reach needed for the multi-media, multi-platform digital world, able to work alongside the BBC but with a distinct role.

RIG believes that it is vital that in the process of identifying these providers, the independent radio production sector is recognised as a key supplier of such content. The role of commissioner of content should not fall on the BBC alone, nor should it be controlled by the existing broadcast institutions. A new organisation must be setup, with overall control of the commissioning of content, and a remit to actively promote independent production and content delivery.

With the understandable but regrettable abandonment of Channel 4 Radio, and a lack of national commercial radio stations/brands to compete with the BBC, we would therefore welcome moves by the government to encourage increased commissioning of radio content from independent sources.

Pg 5 - At the same time, we need to ensure that Britain is well positioned to take advantage of the opportunities around innovation in new media content. Our track record in creativity and technical innovation in existing media provides an excellent base, but this needs to be married to development of business models that enable content creators to flourish on new platforms. We must also have the research and development programmes that will help us maintain our position.

New business models to encourage production are vital to Digital Britain's future. Over the past few years content and production have begun to be devalued by a Government push to get more rights for less money, and so called Value For Money drives. Radio is already being produced at incredibly low cost and delivering high-quality, listener-focused programming that hits over 90% of the UK adult population and delivers value-per-listener that no other medium can manage. RIG believes that now is the time to encourage the BBC and others to channel investment back in to content production, and aim for quality over quantity. Content producers need a robust business model that will allow them access to funding, open-minded commissioning, control of their underlying rights and access to markets.

Pg 6 - Equally important, the digital society can offer more efficient public service delivery. This will be crucial in an era of very tight constraints on public spending in the years to come, with an additional £5m of efficiencies announced in the 2008 Pre-Budget Report. Using the money in the service rather than its delivery is a major benefit for both the user and the taxpayer.

It is important that the Government not fall in to the trap of believing that Public Service delivery can only be delivered via staff and facilities directly run by existing public service organisations. Although appropriate budgets are always required to produce high-quality

productions, RIG nevertheless believes that a greater use of independent producers will help with efficiencies, as the cost of independent production in radio is lower than that of BBC in-house. Opening up more commissioning opportunities would also allow for greater

flexibility of costs, including the strong possibility of economies of scale. Public service delivery needs to be cost-effective, but it also needs to recognise the limits of what can be done. There is a natural floor at which BBC-style commissioning cannot go below in terms of budget, without losing quality and access to talent. Over-protectionism of its in-house production units can cause the BBC to have greater overheads, whereas the independent productions sector comprises mainly SMEs who can turn around projects faster, and at lower overheads.

Pg 6 – The Information Age Partnership

RIG can play a strong and important role in the IAP and would welcome an invitation to join the group.

Pg 7 - Digital Britain: Five objectives

- *Upgrading and modernising our digital networks – wired, wireless and broadcast – so that Britain has an infrastructure that enables it to remain globally competitive in the digital world;*
- *A dynamic investment climate for UK digital content, applications and services, that makes the UK an attractive place for both domestic and inward investment in our digital economy;*
- *UK content for UK users: content of quality and scale that serves the interests, experiences and needs of all UK citizens; in particular impartial news, comment and analysis;*
- *Fairness and access for all: universal availability coupled with the skills and digital literacy to enable near-universal participation in the digital economy and digital society; and*
- *Developing the infrastructure, skills and take-up to enable the widespread online delivery of public services and business interface with Government.*

RIG is encouraged by points 2, 3 and 4. UK independent radio and audio producers are key to delivering these objectives and on that basis RIG would expect to be a part of the ongoing discussions and policy making process.

We encourage the Government to take seriously the role of independent producers in bringing access to local, regional and national news, talent and content, and in doing so

recognise that there is a lack of investment at this time in independent production for radio and audio.

RIG also believes strongly that independent radio and audio producers can and should play a central role in the creation of digital literacy content, and that in this area the BBC and other

commissioning organisations should again operate a WOCC with 25% contestable programming, underpinned by an additional minimum requirement to commission 25% from independent producers.

SECTION 2 – DIGITAL NETWORKS

ACTION 9 – DAB Digital Radio

RIG wholeheartedly supports DAB and the Government's actions to ensure it grows and builds on its current success. We would remind those involved that investment and policy should focus equally on content provision as much as on technology and platforms. RIG would like to become a part of the DRDG. We would recommend that the independent expert examination also consider the economics of programme production and the realities of falling advertising revenue and BBC programme budgets. At this time DAB is undervaluing content and underpaying rights holders. The wholesale move from analogue to DAB cannot have the side effect of drastically cutting rights fees.

SECTION 3 – DIGITAL CONTENT

Pg 37 - British consumers have a huge appetite for new digital services, with high levels of take-up of new networks and devices. This in turn creates a market environment which unlocks new commercial possibilities and encourages innovation in new content, services and applications. These changes are challenging the economics of intermediaries of all kinds and more traditional types of content companies – publishers, the music industry, the newspaper industry and broadcasters – in particular. There are four commercial challenges that need to be addressed to preserve a healthy content market in the digital age.

Firstly, if digital distribution and copying costs are lower so too are digital revenues from the product or the advertising impact; often, in current business models, an order of magnitude lower. New business models need to evolve for that environment. The role for regulation or intervention is not to prevent the emergence of new business models or to preserve old and unsustainable ones. It is to contribute constructively to the transition.

The current demand on the BBC to cut costs and deliver programming content for less, while at the same time taking more rights, is affecting the ability of independent radio

content producers to run sustainable businesses. In TV the broader commercial market for ideas allows there to be a way for producers to offset some of these problems, but in radio there is no alternative market for documentaries, dramas or features. As such, legislative and regulatory intervention are urgently needed, to ensure independent radio producers not only get fair and open access to commissioning opportunities and airtime, but are not

priced into bankruptcy by a misguided emphasis on squeezing budgets ever lower. In a digital economy there must be recognition of the true cost of production and the number of opportunities available to the creative sector.

Pg 38 - Secondly, the rapid growth in the number of digital outlets has hugely increased the volume of advertising inventory available. This trend will only increase: unless there is a paid-for product or service for the consumer to own, (e.g. paid-for content or application downloads) internet content is perceived to be 'free'- i.e. if monetised, it is through advertising. This increase in the volume of advertising impacts has a commensurate impact on their price (and hence on the margins of advertiser-funded businesses).

RIG would recommend that there be a review of the advertiser-funded content regulations. At this time there is no recognition by Government that listeners can differentiate between editorial content and advertiser content. RIG contends that listeners are much more informed and educated about such differences, and where produced with care and skill, advertiser-funded programming could bring much needed additional investment into the digital outlets, and offer the listeners more opportunity to hear innovative and creative programming.

Pg 38 - Thirdly, there is the challenge of access to content and the ability to innovate across the increasing range of distribution platforms and digital devices. Convergence has allowed development of bundled packages offering consumers a mix of content and services. Development of business models built around such bundling depends to a large degree on wholesale access to important content to deepen the range of bundles addressing individual consumer preferences.

RIG agrees but would remind the Government that rights have value. Underlying rights holders have a right and an obligation to earn from the exploitation of their properties.

Pg 38 - Fourth, the very ease with which digital content can be distributed and copied also dramatically increases the scope for unlicensed and illegal copying and distribution. At the same time, new technological forms of piracy are being manifested at an increasing pace. Counter-piracy measures and effective rights enforcement are an important element, but only one element and

insufficient on their own: new methods of legitimate access, based on new business models and incentive structures will be crucial.

RIG believes that it is time for all parties to work together to combat and ultimately prosecute content pirates. At the moment there is no single concerted effort by rights holders to target P2P operators, or content pirates, and it is recognised that pursuing individual cases is simply too expensive. SME content producers do not have the legal

means at their disposal to prosecute in such cases, and the BBC and other broadcasters will not represent the independent producers, even though they are the commissioner and the broadcaster.

Pg 38 - This is placing pressures on professional content, whether in programme-making or in journalism and newsgathering, with significant implications for the future health and growth of the sector. While some traditional audio-visual content is under threat, new media content is in its relative infancy as a possible new generator of economic wealth. Faced with these challenges and, in particular, the dwindling of the advertising pound in its historic role as underpinning finance for much content creation, the UK needs to consider whether there are other funding streams or mechanisms that would substitute in whole or in part. Several of these, including regulatory assets, industry or equipment levies and contestable funding for content production that meets public purposes, are deployed in varying degrees in other markets.

RIG would like to see a review of the BBC's dominance of audio in the commercial sector, blocking and damaging the growth of independently produced content being sold in the digital realm. RIG would also encourage a discussion of investment in training; local content production; development of creative concepts; VAT reduction on equipment for creative production and tax benefits for creative content producers.

We note that the UK computer games industry is currently seeking specific support, and would suggest that the issue of remaining competitive in an increasingly international marketplace affects all UK creative industries and our proposals should be seen in this light.

Pg 42 - ACTION 11

By the time the final Digital Britain report is published the Government will have explored with interested parties the potential for a Rights Agency to bring industry together to agree how to provide incentives for legal use of copyright material; work together to prevent unlawful use by consumers which infringes civil copyright law; and enable technical copyright-support solutions that work for both consumers and content creators. The Government also welcomes other suggestions on how these objectives should be achieved.

RIG supports the formation of such a Digital Rights Agency, and would see ourselves as playing a key role in its formation and oversight. However, the body would have to encompass the BBC and have powers to ensure that the BBC and other large archive owner/operators did not dominate such a market, or through their scale, force down the price of content and rights to the detriment of individual producers and smaller content rights holders.

Pgs 45-50 – 3.3 Investment in Content: Original UK Content

Pg 46 - We believe that we need to aim for plural public service provision which gives us:

Sources of high quality impartial news at local, regional as well as national level, including the Nations as well as the UK as a whole.

Large scale original British content.

A wide range of voices and talent from across the whole United Kingdom, secured in part by ensuring the continuation and development of creative talent clusters in the regions and Nations, currently guaranteed through regional production quotas on some public service broadcasters.

Guaranteed levels of investment in independent production to ensure the delivery of the best creative ideas and the healthy development of this vital creative sector, similarly secured through quotas.

A range of commissioning sources for innovative original production.

Original children's production for all ages but especially for over 10s.

The development of plural sources of commissioning for current affairs, international issues and serious factual programmes.

RIG encourages the development of a plurality of commissioning sources for original content production, and the necessary investment and regulation that this entails. As well as wanting to see a requirement for greater independent radio production commissioning from the BBC, we recognise that new commissioners for radio and audio content also need to be created and encouraged, with access to funding and platforms.

In terms of content from across the UK, independent producers are in a unique position to enable this. The BBC cannot build Media Centres everywhere, but with today's technology independent producers can now more easily be based around the country and therefore reflect local views, issues and cultures to a national audience. To enable this UK-wide sector to grow and provide more innovative high-quality content, we would like to see a minimum out-of-London radio commissioning requirement introduced for the BBC.

We also recognise that children's radio production is an important issue. There has been some speculation that the BBC will voluntarily, or be required to, set up a new national children's radio service, using UK-produced content. In order to ensure the greatest range of ideas, talent and perspectives from around the UK, we would ask that all new BBC services only be approved be subject to having a WOCC system such as that described on page 5 of this response.

Pgs 46-47 - Although we can expect the market to deliver some of these types of content to some degree, it is likely that interventions will be essential to meet the expectations and requirements of UK viewers...

RIG is disappointed to see the word 'viewers' used here, and would ask that this be changed in the final report to the more accurate terms of 'audiences'. Throughout the report radio and independent radio production are ignored and/or sidelined in favour of TV and online. RIG would like to see more recognition of the medium, and the position of its independent producers, within the final report.

Pg 49 - Support for UK originated content brings dual economic and social benefits. The starting point for both is to ensure a strong home market for investment in content of all types, on which we can build international success. A strong and innovative BBC, working with the market, will be at the cornerstone of these efforts, currently with more than £3 billion public funding each year. The BBC also has, in BBC Worldwide, an international rights-exploitation and channel operating entity with revenues of £916m and earnings of £118m. It is one of the more successful UK international media operators. It is well placed in the field of global rights exploitation upon which the strongest growth within the digital economy is based. It also has a portfolio of distribution channels in the UK and around the World which act as a shop window for those rights. Its success over the quarter century it has existed (as BBC Enterprises before becoming BBC Worldwide) has rested in large part on its proximity to the BBC licence-fee funded public services, the BBC brand around the world, and its first-look exploitation relationship of the relevant rights.

RIG would encourage the Government to require the BBC to work in more collaborative way with independent radio producers in regards to both commissioning of original material, and developing and growing commercial opportunities for programme exploitation.

As the television market has shown, if producers themselves are in a position to market and sell their own content, they are able to both sell more content, and get a better price for much of that content, than if the same IP rights are warehoused by BBC Worldwide.

However, part of this requires that the BBC stop its move to release large amounts of its radio archive into the market for free, and to offer programmes as free-to-download. These

activities threaten to devalue and destroy the fledgling digital exploitation markets that radio independents and audio producers have been building over the past 5 years. The BBC recognises that it cannot have a negative impact on the audiobook and classical music markets, but refuses to recognise the damage it is having and will have on the markets for dramas, documentaries and features.

Pg 49 - Following the BBC's own review of BBC Worldwide at the beginning of this decade, BBC Worldwide has been run as a vigorously commercial entity over recent years...

RIG would recommend that as the pre-eminent publisher of audio and radio content BBC Worldwide and BBC Audiobooks be restructured to work with the independent radio production sector in a more collaborative and commissioning basis. With lower budgets and less commissioning available through the BBC radio networks, BBC Worldwide are in a prime position to invest in new content and publishing of existing content produced by indies.

Pgs 49-50 - Changes are needed in the commercial broadcasting sector. The advertiser-funded, free-to-air broadcasters have contributed almost as much to investment in original UK content as the BBC, and more than the rest of the market put together...

Once again, RIG is disappointed to see that commercial radio is not considered in this section. There are no commercial radio PSBs, and the sector has little role in the commissioning of independent radio production in comparison with the BBC. RIG would like to see an encouragement of independent production within the commercial radio field, and would be happy to work alongside The Radio Centre and the DCMS to find ways of funding such production. It is vital that new investment be offered to commercial radio, and particularly local commercial radio which is being eroded through networking, cost-cutting and regulation. RIG believes that commissioning and delivery of independently produced programming at a local level could help stimulate localness within commercial radio. However, at this time, commercial radio does not have a business model that allows for commissioned content. RIG also believes, as stated elsewhere, that it is important that any new national PSB should compete with the BBC for the best radio programmes and content.

Ps 50-51 - An important part of the UK's international success in content to date has been driven by a successful and entrepreneurial independent production sector.

ACTION 15

The existing Terms of Trade between the independent producers and broadcasters have worked well. In light of new entrants to the market, new business models and new distribution channels, it makes sense to have a forward look at how the relationship between independent producers and those who commission their ideas could evolve...

As the negotiating body for radio Terms of Trade for independent radio producers, RIG would welcome the opportunity to discuss the current and future Terms. However, it is imperative that it be understood that potential new Terms of Trade cannot simply require ‘more rights for less money’. As producers our programmes are our property and we have a right to earn from their exploitation. We already suffer trade restrictions as radio producers

by the BBC’s dominance of the audio markets, and refusal to recognise our right to build and maintain such markets, and with the potential giving away of the BBC’s creative archive, these markets are under even further threat. Radio producers are very happy to extend the opportunities for audiences to hear our work, but there has to be recognition of the value of such uses and rights.

Pg 51 - ACTION 16 In the final Digital Britain Report, we will establish whether a long-term and sustainable second public service organisation providing competition for quality to the BBC can be defined and designed, drawing in part on Channel 4’s assets and a re-cast remit. It would be a body with public service at its heart, but one which is able to develop flexible and innovative partnerships with the wider private and public sector. While it makes sense to begin by looking at public sector bodies-Channel 4 and BBC Worldwide- the Government is currently evaluating a range of options and organisational solutions for achieving such an outcome.

RIG agrees completely with this statement, but reminds the Government that any such Public Service provider should also supply national radio content. At this time there is a massive disparity between BBC and commercial radio, with the BBC dominating the national airwaves due to the lack of national commercial competition (historically there are many reasons for this disparity).

The Government’s intention to create a new PSB is an opportunity to resurrect the regrettably unfulfilled aims of Channel 4 to establish new national PSB radio services. At the time RIG warmly welcomed these plans. We also welcomed that fact that in keeping with its remit in other content-producing areas, Channel 4 intended to work heavily with independent producers to source for those services the best ideas and content from around the UK. We fully accept that it was despite Channel 4’s best intentions that these plans had to be abandoned due to economic circumstances.

We totally agree with Ofcom and the Government that the proposed new second PSB should have Channel 4 at its heart, in recognition of Channel 4’s unique model and relationship with the independent production sector. In this light we would ask that this new PSB be required to examine the viability of new national PSB radio services, either immediately or for the future. As was argued during 4Radio’s successful bid for the DAB multiplex, such services would compete with the national BBC radio services, and allow for

competition of ideas and productions, increasing opportunities for commissioning from independent production companies based around the UK.

SECTION 4 – RESPONSE TO EQUIPPING EVERYONE TO BENEFIT FROM DIGITAL BRITAIN

Pgs 66-69 - 5.2 Media Literacy
ACTION 22

The current statutory and specific remit on media literacy is contained within s.11 of the Communications Act 2003. As this report makes clear, since 2003 there have been significant market

changes in the availability of digital technologies and how they are used. We will ask Ofcom to make an assessment of its current responsibilities in relation to media literacy and, working with the BBC and others, to recommend a new definition and ambition for a National Media Literacy Plan.

RIG believes that UK independent radio and audio producers can and should play a vital role in the formation and delivery of a National Media Literacy Plan. It is vital that any such plan not be delivered solely by the existing institutions such as the BBC, and that if such organisations are to be used to facilitate the production of the content, that there is a mandatory 25% independent quota across all mediums.

RIG would insist that all radio and audio content which is to be produced for a National Literacy Plan be made available to independent producers. The BBC and COI should be required to operate a WOCC system with 25% contestable commissions and a minimum of 25% of such content from independent producers.

SECTION 5 –CONCLUSION

RIG agrees with the conclusions of the report and would reiterate that the UK's independent radio and audio producers have a lot invested in the process already and have a voice to be heard. Content is as important as platforms and technology, but of equal importance is a fair and level playing field regarding opportunities to access investment, output and commissions. The UK has a unique and experienced independent radio and audio sector, it is time that it is engaged with, supported and invested in.