

*“Working for quality
and diversity in
British broadcasting”*



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VOICE OF THE LISTENER & VIEWER RESPONSE TO THE BBC TRUST CONSULTATION

DELIVERING QUALITY FIRST

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No part of this response is confidential.

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Please note that Voice of the Listener & Viewer (VLV) has also submitted a Response to the BBC Trust's Service Review on BBC Local Radio, which should be read in conjunction with this submission, where VLV expands its views about the BBC Local Radio services.

VOICE OF THE LISTENER & VIEWER RESPONSE TO THE BBC TRUST CONSULTATION

DELIVERING QUALITY FIRST

Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British broadcasting system.

VLV welcomes the opportunity of responding to the *Delivering Quality First* (DQF) consultation, conducted by the BBC Trust regarding proposals for cutting 20 per cent of BBC activity.

INTRODUCTION AND SUMMARY - VLV'S APPROACH TO THE CONSULTATION

We see our response to DQF as part of a continuing communication with the BBC. We have completed this document in the light of our earlier responses to the BBC Trust's reviews of key BBC services and to the BBC Strategy Review of 2010.

When the DQF process was announced in the spring of 2011, VLV began consulting its membership and holding discussions. During 2011 we organised public meetings in the Nations and Regions - in Belfast, Edinburgh, Leeds, Manchester, Sheffield and London, as well as a Westminster seminar with the Secretary of State for Culture, Media and Sport, two major conferences in London and our annual session on children's programmes. Our response here reflects the outcome of these activities and is in four parts.

1. VLV's concerns about the process.
2. Some general comments which go beyond the questions listed in the consultation document. We consider that the Trust's questions cannot be addressed in isolation from the overall DQF project. We have also put the consultation in the context of the 2010 licence fee settlement which - although not part of the consultation - cannot be ignored, as it was the trigger for the exercise.
3. Comments on the four key elements in the consultation as requested by the Trust.
4. Detailed comments on matters of concern where these cross over several aspects of the consultation (as in the case of news) or where more background information seems to us to be required.

1. THE PROCESS

We appreciate that the consultation document tries to offer a brief but accurate picture of the choices made and the recommendations put forward by the BBC Executive. The document is in two parts. In the first the BBC management sets out what it sees as the three key issues of 'productivity', 'scope' (the range or content of programmes and services) and, thirdly, the importance of continuing to invest in digital public space and quality. The second half of the DQF document consists of the BBC Trust's consultation with the public and gives the Trust's description of, and comments on, the 'scope' challenge and the proposed changes to existing services.

We have found it difficult to prepare our response because of what we consider to be some flaws in the consultation process:

1.1. The questions asked by the BBC Trust address the 'scope' or service content changes but do not address the issue of 'productivity' and the likely consequences of efficiency cuts.

1.2. Our response has been further hampered by a lack of detailed information in some of the relatively short summaries of the proposed changes to existing services. While we acknowledge that comprehensive details could not be included in the DQF consultation, we were frustrated by the lack of detail in many of the proposals; in many instances this made it impossible to understand their practical implications. The problem became apparent in the weeks after the publication of the consultation. For example, there were leaks about staff cuts and other pertinent information emerged in interviews or statements at several levels of management. It was difficult for us to assess the extent of the proposed changes and therefore a challenge for us to provide a full response.

1.3. The impact of the five new liabilities required by the 2010 licence fee settlement are excluded from consideration; i.e. the funding of the World Service, the Welsh Fourth Channel (S4C), BBC Monitoring and rural broadband roll-out, along with a contribution to the costs of local television.¹

1.4. The DQF document largely assumes that what are called 'efficiency' or 'productivity' cuts can be made without affecting the quality of services available to the public. Despite the comment 'We will require assurance from BBC management that productivity and efficiency savings are being delivered without compromising quality',² we cannot share the Trust's confidence that quality will not be affected.

We have made these comments as, in October 2010, BBC funding was frozen and its commitments increased. This was compounded by the speed of the licence fee settlement that prevented any input from citizens - the licence fee payers. We had hoped that after nearly a year to prepare the plan to cope with the licence fee settlement there would have been greater clarity and more detail on which to base a reasoned response.

2. GENERAL COMMENTS

2.1. The Cuts in Context and BBC Independence and Impact

The DQF process became necessary as a consequence of Government intervention in October 2010 when the licence fee was frozen for the next six years and the BBC was required to take on the five major new liabilities noted above. In addition to the inflation-based erosion of the value of the licence fee over time, we estimate that the cost of the new liabilities amounts to well over £0.5 billion and should be seen in the context of a total licence fee income of £3.5 billion in 2011.

Notwithstanding statements to the contrary in the consultation document and in the BBC's *Annual Report 2010-11*³ it appears to us that the Government has intervened in a way that has jeopardised the independence of the BBC, requiring it to fund activities that are not, in our view,

¹ DQF, p. 39, footnote 3

² DQF, p. 36

³ Pt. 1, p. 24

consistent with the previously agreed public purposes of the Corporation; e.g. the funding of broadband rollout and subsidising of local commercial television. It is quite reasonable to expect that all of Britain's cultural institutions will be affected by the difficult economic circumstances of the time however, the BBC is not a department of state but an independent body funded directly by its users – the licence fee payers. The BBC is not funded by general taxation. Its high international reputation rests in part upon the mechanism of the licence fee, considered as one of the guarantors of independence from the state. By contrast, the government of the day, quite properly, expects to control the national Treasury.

Our concern that BBC independence has been eroded by both the manner and the substance of the 2010 licence fee settlement is matched by a concern about the continuing erosion of levels of investment in original programme production by Britain's public service broadcasters, chief among whom is the BBC. The regulatory body Ofcom estimates that - as competition for viewers intensified - the spend on first-run originated television programmes by Britain's public service broadcasters fell from £3.1 billion in 2004 to £2.4 billion in 2009, levelling out and rising slightly to £2.5 billion in 2010, with more than half of this rise coming from the BBC.⁴ In the more specific area of spending that supports local democracy, devolution and regional interests - the so-called 'nations and regions' programmes - in the four full years from 2006 to 2010 spending at ITV fell by 43 per cent and at the BBC by 14 per cent.⁵

The BBC exerts a major influence on the ecology of British broadcasting and on the choices available to listeners and viewers. In large measure it is the provision of popular BBC programmes, along with the offerings of ITV and Channel 4, that have persuaded a majority of households – 55 per cent - to opt for free-to-air television rather than the offer of subscription or pay TV.⁶ For households that rely solely upon licence fee and advertising-funded television, the Government's decision to cut back significantly on the value of the licence fee will inevitably reduce the range of cost-effective services to which they have access.

2.2. Public Trust

Public trust in the BBC has, we suggest, been damaged as a result of the 2010 licence fee settlement and a number of other public incidents, for example, the controversies about the pay of both talent and senior management and about specific programmes. We are aware that the BBC is particularly vulnerable as large sections of the media are hostile to it. Surveys show that the public still trust BBC news output. Retaining this trust is crucial if there is to be continuing public support for the principal of the licence fee and for the BBC as a public service.

2.3. Staff Morale and Remuneration

Despite some brave statements by senior management to the contrary, staff morale has been progressively undermined (see *Ariel* in the past few years). We acknowledge that the DQF exercise was structured to enable staff involvement but it came after several years of efficiency savings and the 2010 Strategy Review. If the changes and reductions now proposed are to work as expected, then the people involved have to be suitably energised and motivated. The restoration of morale along with the rebuilding of trust is essential. There is no evidence of a plan to do this in the current proposal. The only references to people are as resources whose rewards

⁴ Ofcom, *Communications Market Report 2011*, p. 97; Ofcom, *Public Service Broadcasting Report 2011* – Information Pack B: PSB Output and Spend, p. 5.

⁵ Ofcom, *Public Service Report 2011*, p. 2.

⁶ Ofcom, *Communications Market Report 2011*, p. 97

and jobs will be altered to produce savings.⁷ We are aware that senior staff are talking to staff at all levels; we hope they are also listening.

The privilege of working for the BBC and the pride in results obtained might in the past have offered some compensation for lower salaries, but there remains considerable scepticism in the remaining work force whose pay and fringe benefits are vulnerable. VLV would like to see a section in the final plan recognising that it is the people who work for the BBC who are crucial in implementing the proposals. Only people (not systems) can make the plan work.

2.4. Training

High standards and training are necessary tools to ensure the cuts proposed produce the desired results, which will then strengthen public trust in, and support for, future licence fee negotiations. Training is not mentioned in the proposal and, with current low staff morale, this remains one of the few ways in which the BBC can mitigate the impact of the DQF process on those who are affected. Maintaining quality and standards of training for all BBC staff can only be achieved by protecting the BBC Training Academy from cuts, if at all possible.

2.5. Investing in Digital Public Space and Reinvesting in Quality

This is the final section of the BBC management contribution to DQF. By aiming for 4 per cent more savings than required, it is planned that there will be £145 million available for investment. It is proposed that £103 million of these savings is made available for new programmes along with £42 million for the Digital Public Space.

However there is a major qualification ‘this fund will depend on realising all proposed savings and on the BBC’s ability to mitigate other risks to its finances.’⁸ In the current economic climate and with uncertain levels of inflation in the key areas of BBC expenditure we are concerned that this fund may have a significant shortfall. Our concerns are reflected in a conclusion of Ernst & Young in the review commissioned by the Trust: ‘the challenge remains of delivering a significant transformation programme in a difficult economic environment.’⁹

3. THE FOUR KEY ELEMENTS IN THE CONSULTATION

3.1. Introduction

We welcome the BBC Trust’s commitment to the two priorities to increase distinctiveness and serve all parts of the audience.

We note that the BBC Trust sees the need for BBC Management to work up ‘robust, detailed delivery plans’¹⁰ and VLV is reassured that the BBC Trust states that it will regularly assess whether the quality of content is being compromised by the DQF process. We look forward to the regular progress reports promised by the BBC Trust.

⁷ DQF pages 17 to 19

⁸ DQF page 28

⁹ DQF page 36

¹⁰ DQF, page 36

However we cannot agree fully that this approach is the right one since there is not enough detail in the DQF proposal to demonstrate how changes can be implemented in ways that ensure continuing quality and diversity of content.

It is essential for the future of the licence fee and the BBC that it caters for the vast majority of the population. The BBC must not be seen as a broadcaster that only provides for the 'well educated' and those with 'serious' interests. VLV supports the DQF proposals insofar as these seek to ensure that the BBC will continue to offer a wide range of quality, distinctive programming across all genres.

3.2. Television

The complementary roles envisaged for BBC Three and Four in relation to the two main channels BBC One and Two seem to be a sensible development. However there must be clarity of purpose between BBC Two and BBC Four otherwise these channels could appear to merge - to the detriment of BBC Four's distinctiveness.

We are concerned about the lack of clarity and the uncertainty in the provision of the two key editorial priorities, that is for (a) knowledge, music and culture, and (b) ambitious UK drama and comedy. We do not consider music, classic and new drama to be different from 'culture' and there is considerable cross over between these categories.¹¹ Taken together, these genres represent some of the most expensive BBC content, a major contribution to the culture of the UK and also to the international reputation of the organisation. The references to arts and music under BBC Two and BBC Four suggest a reduced commitment with more 'sharing, repeats and transfers' in this area compared with history, science and business specifically mentioned for 'reinvestment' under BBC Two. We understand that the individual programme and series budgets are much smaller on BBC Four than BBC Two. We assume that when specific genres move to BBC Two the lower budgets will remain and this is part of the DQF savings. Similarly any genres moving to BBC Four will see budget cuts.¹²

Specifically on drama provision across the television services we are concerned that in a document with the title *Delivering Quality First* there is still no action on the areas highlighted in the VLV response to the 2010 consultation on the BBC Strategy. In that response we noted: 'There is no real commitment to using any of the television channels to bring the work of the post 1950s generations of dramatists and other writers to television audiences. Equally there should also be a commitment to the broadcasting of plays from the rich heritage of drama in the United Kingdom and the world from classical times to the 20th century. It is rare to see the work of Ibsen, Chekhov or Shaw.'¹³

3.3. Radio

Radio is a special part of the media as it has a unique nature 'a flexible medium, radio's appeal to the listener is that it is more than simply a stream of audio: it is an intimate, portable and ambient medium; and it is a very personal medium: the pictures that it forms inside our heads

¹¹ An example of the merger of these areas is the biographical dramas on BBC Four which we hope they will transfer to two.

¹² The most recent service licences give an operating budgets of £421.4 million for BBC Two and £54.3 million for BBC Four

¹³ Page five of VLV response to BBC Strategy review May 2010

are different for every listener.¹⁴ It is a central part of the lives of many groups; the housebound, the sight impaired, those in institutions, the elderly, people who work alone or through the night. Radio keeps them in touch in a personal way not achieved by other media.

For this reason any attempts to reduce output or change radio channels must be done with great care. Radio is a very economical medium with very few staff working on each programme. Even a small cut can affect quality and content. Radio has already had year on year cuts. We have found it a challenge to respond adequately to this section of the consultation as there is so little detail given regarding the many hours of programming that could be affected. A small cut can have major consequences for any one programme. We outline our detailed concerns below.

We are opposed to the scale of the proposed cuts in local radio and believe these to be inimical to the growth of local democracy, the expression of local interests and the reflection of local cultures (See our separate response to the current BBC Trust Local Radio service review consultation which should be read in conjunction with this section of this submission.)

3.4. Nations and Regions

VLV welcomes the commitment to production outside London: 'we expect to meet the 17 per cent target for network television programmes to be produced in Scotland, Wales and Northern Ireland earlier than 2016 and exceed it by the end of the Charter.' We welcome this especially as it is accompanied by the statement: 'this new output will be accompanied by measures to increase portrayal and representation of the whole UK'.¹⁵ However, we do not understand how an 'increased portrayal and representation' will be achieved by a major reduction in the BBC's presence in Birmingham. Also the costs of the move in the late 90s to the new Mailbox premises in the centre of Birmingham will presumably have to be written off. This we believe to be wasteful both culturally and economically.

We welcome the proposal to bring more 'output made specifically for Scotland, Wales and Northern Ireland to UK audiences'.¹⁶ We consider this should increase the 'portrayal and representation of the whole UK.' Much of this material is of interest to the whole of the UK and often made on much lower budgets than programmes made within the M25. We also welcome the proposals in this area for news.¹⁷

We are not sure we understand the implications for regional coverage if the regional programme *Inside Out* retains its investigative journalists but is to be 'shared across larger regions.'¹⁸ This seems to suggest the same staff making fewer substantive programmes.

On Radio One music coverage in the regions, (see comments in 4.2.3).

On the role of the BBC performing groups in the regions, (see comments in 4.3).

On the changes to local radio in England see our separate response to the current BBC Local Radio service review.

¹⁴ Digital Britain Report Chapter 3b paragraph 2)

¹⁵ DQF page 26

¹⁶ DQF page 25 - 2.2 bullet 2

¹⁷ DQF page 21

¹⁸ DQF page 21

3.5. Digital Output

We welcome the ambition for the BBC to be ready ‘to partner others to build a shared digital public space’¹⁹ and would welcome more detail on this proposition.

VLV welcomes the ambition for digital curation – ‘using editorial, social and personal tools to make the most of content, bring audiences more of what they like, and increase their engagement and participation with the BBC.’²⁰ VLV believes that there is potential for the BBC to increase its engagement with the audience via its online offering.

We also urge the BBC to fulfil its goal to make the most of the growing popularity of networks off bbc.co.uk, extend the reach of content, engage with new audiences. There is huge potential for the BBC to connect to a ‘web’ of sites outside the BBC to increase audience engagement and information takeaway.

4. DETAILED COMMENTS ON SELECTED KEY ISSUES

4.1. News and Journalism

We note the comment by the BBC Trust Chairman that ‘the major news stories of the past year have highlighted again the importance of the BBC providing an independent source of information and a public space for arguing and debating the future.’²¹ We welcome the sentiment in this statement and sincerely hope that the DQF cuts will not in any way undermine the role of the BBC as laid out in his comment.

4.1.1 Serving All Audiences

News is a genre which delivers the greatest value to large parts of the audience. It is cited by Ofcom as the most important aspect of public service broadcasting. 75 per cent of respondents in the 2010 Ofcom PSB Review cite television as their main source of world news.²² We strongly oppose the proposal for core and breaking news stories being the dominant force on the News Channel. Under the DQF proposal the breadth and depth of the news covered will be diminished at a time when research shows the news agenda is narrowing. It is essential that, whatever happens in the coming four years up until Charter Renewal, the BBC ensures its news retains the public’s trust through its high quality, impartiality and breadth.

We know that journalists are keen to break stories first but this instinct needs to be balanced with in-depth stories which provide context, both domestic and international. The BBC should provide reports from places other broadcasters cannot. The BBC should determine the news agenda, rather than slavishly following breaking stories and being essentially reactive. There is an opportunity here to provide depth on the News Channel which is not possible on the main bulletins.

4.1.2 Distinctiveness

It is VLV’s view that the BBC will only retain its distinctiveness if it remains ambitious, innovative and imaginative. These characteristics are likely to be eroded with lower

¹⁹ DQF page 6

²⁰ DQF page 52

²¹ DQF page 1

²² *Perceptions of, and attitudes towards, television: Ofcom (2010).*

budgets and an increasingly competitive marketplace. We urge the BBC to safeguard the ambitions set out in its public purposes to provide viewers with a range of engaging programmes which provide us with a window on the world.

4.1.3 News

The quality of news is essential to maintain public trust in the BBC. We largely welcome the changes to the BBC's newsgathering operation but we fear that the upheaval of the transformation at BBC World Service and BBC News will be disruptive and needs very careful managing. The future of BBC News is dependent on this merger - yet it is quite unclear how it will work in a practical sense.

With restricted budgets, especially in local radio, the BBC needs to secure against 'churnalism', the rewording of press releases into scripts or interviews for guests when a press release has been issued. This is likely to occur when there are not enough resources for proper investigation and would represent a real reduction in quality.

Arts, culture and science reporting receive too little coverage in the BBC One bulletins and should be an important strand on the BBC News channel to increase range and diversity. If this change is unavoidable then there should be trails to the coverage of these subjects on other BBC services.

4.1.4 BBC Three

We urge BBC Three to continue producing its distinctive and successful current affairs programming such as the *Blood, Sweat and...* series, *Stacey Dooley Investigates*, *Women, Weddings, War and Me*. These programmes have engaged a new, younger audience with foreign affairs and the lives of people outside the UK in an imaginative and innovative way. They contribute greatly to the distinctiveness of the BBC.

4.2. Radio

4.2.1 General proposals we can support:

- (i) The relatively small cuts in content spend across the BBC national radio services.
- (ii) The proposal to 'safeguard the mainstay of daytime programmes' on Radio 2.
- (iii) On Radio 3 to reinvest in The Proms to maintain quality but we suspect the £1 million quoted elsewhere may not keep pace with inflation.
- (iv) On Radio 4 Extra the retention of 'family-targeted programming' but hope this will be genuine radio for young people.

4.2.2 Proposals where we can give qualified support

- (i) The sharing of news bulletins across services. For example 'in future Radio 3 will use shorter versions of the Radio 4 bulletins.'²³ The short bulletins on the Radio 3 drive time programmes include more items than the equivalent on Radio 4. In applying the policy of sharing bulletins across the radio services we expect more information so that the listener has better coverage. But the bulletins should not follow breaking news stories and the agendas of other media.

²³ DQF page 21 conclusion to paragraph 4 of 2.1.1.

(ii) Some simulcast of Radio 1 and 1Xtra during the night - providing this is limited to the current proposals.

(iii) On Radio 3, the safeguarding of the live evening concert 'by broadcasting fewer orchestral concerts and replacing them with chamber and instrumental concerts.' The live element only returned in May 2011. This proposal will continue a current trend but we are concerned that this will mean a reduction in the number of large scale, especially vocal, works.

(iv) 'Less specially recorded contemporary music for *Hear and Now*.' We consider that this could be satisfactory if more EBU sourced concerts are used. At present these are often broadcast in the overnight sequence. EBU material could be broadcast more in the concert programmes.

4.2.3 Detailed changes that need modifying

(i) On Radio 1 the replacement of the current' late night Nations' opt-out programmes on Radio 1 with a single programme that offers a UK-wide platform.' We share the concern in the Nations that this will reduce the platform for distinctive new music and hope the budget savings can be achieved while ensuring this platform continues to serve the needs of each Nation.

(ii) On Radio 5 Live it is a matter of concern that there is a proposal to reduce the 'team of regional journalists in England.' With the proposed cuts in local radio services this represents a two pronged attack on local news coverage.

(iii) The decision to retain the BBC Asian Service following the BBC Strategy consultation is welcome. However the cuts to the service could result in the slow decline in listeners and lead to recommendations for closure later in this decade.

4.3. Performing Groups

Our comments on radio and any references to cultural programming are provisional as we have not seen the review referred to under Radio 3: 'management is conducting a review of the BBC's orchestras and singers to consider where both efficiency and scope savings can be made. Proposals are due later in the autumn.'²⁴ With five full time orchestras and a full time chamber choir the BBC is the largest patron of live classical and light music in the UK. In London there is the BBC Symphony Orchestra, the BBC Concert Orchestra and the BBC Singers; in Wales the BBC National Orchestra of Wales; in Manchester the BBC Philharmonic and in Glasgow the BBC Scottish Symphony Orchestra. As broadcasting orchestras they are able to play a much wider range of repertoire. The groups make a considerable contribution to the commissioning of 30 new works a year across Radio 3. Apart from providing a rich programme of live concerts the performing groups tour widely in their regions to broadcast some of their output. Thus enriching the musical life of many parts of the UK. Any significant cuts in the performing groups will have an impact on the cultural life of the UK that will take decades to repair.

We shall submit a supplementary response if necessary once we have seen the details of this review.

²⁴ DQF page 45 Radio 3, point 7

4.4. Television Programmes for Children

VLV welcomes the statement that 'news and children's programming must remain top priorities for the BBC'. However, the intention to remove children's programmes from BBC One and BBC Two 'in time, following digital switchover', will lower public perception of, and parental interest in, these programmes. In order to mitigate the change, the BBC should cross promote these channels on the main channels at key times when children may be watching. There should also be show-casing programmes from the children's channels on the main channels.

We welcome the commitment that 'the BBC proposes to protect this increased children's UK origination budget from any reductions, and so the proportion of the licence fee spent on children's output will rise further.'²⁵ We expect the Trust will ensure that no budget cuts occur when the move takes place.

4.5. Reduction in Transmission Spend²⁶

With the advent of digital transmission of television and radio, considerable savings are possible. We generally support the proposals.²⁷ We note that the majority of viewers are still dependant on terrestrial services and that the BBC is working hard to ensure that all television viewers can receive all services as part of the commitment to universal provision. Some viewers receive the services from relay transmitters that provide significantly fewer services, although they include all public service programming. We expect this to continue while this strand of DQF is developed.

We are not convinced that the consequences of the proposals for radio transmission have been fully worked through. With the work on the Digital Radio Action Plan still to be completed, the time scale for this is not yet clear. The eventual split between local analogue and national digital transmission has not been decided. Until the plan for digital radio is clear we suggest the changes to radio transmission are delayed. There is no break down of the figures but we assume the bulk of the £21 million savings by 2016/17 will come from changes in television costs. Equally the end of Long Wave should be carefully considered. We are not convinced that the costs of continuing the transmission system are that great as other broadcasters in the European Broadcasting Union continue to use the technology on account of the contribution to universal coverage. We hope that in the current budgetary climate licence fee payers money will not be used to fund infrastructure for commercial radio operations.

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21 December 2011

²⁵ DQF page 23

²⁶ DQF page 24

²⁷ DQF page 24