

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



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VOICE OF THE LISTENER & VIEWER RESPONSE TO THE DCMS CONSULTATION ON

THE ROLE OF INDEPENDENT PRODUCERS AND INDEPENDENT PRODUCTION QUOTAS IN LOCAL TV

8 MARCH 2012

**Voice of the Listener & Viewer's Response to DCMS' consultation on
The role of Independent Producers and Independent Quotas in Local TV
with reference to Ofcom's consultation on Licensing Local Television – how Ofcom
would exercise its new powers and duties being proposed by Government**

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.

1 Introduction

VLV welcomes the opportunity to comment further on the plans for Local TV. This submission is in response to the DCMS: *Consultation on the Role of Independent Producers and Independent Production Quotas in Local TV* and the Ofcom Consultation: *Licensing Local Television - how Ofcom would exercise its new powers and duties being proposed by Government*. As there are obvious links between these documents we have decided to deal with the two consultations in a single response.

2 Ongoing concerns

In our previous submissions (Response to DCMS: Consultation on Local TV July and August 2011, Response to DCMS: Local Media Action Plan) we outlined a range of concerns around some key public service broadcasting issues. Many of our detailed points have not been addressed or dealt with in subsequent responses from DCMS. Regarding the role of Ofcom, we think the licensing process should take account of the following issues:

- quality of content,
- impartiality of news,
- availability and sources of funding,
- the dangers of sponsorship and
- the lack of rural coverage.

We remain concerned that, to date, documents issued by DCMS indicate a relative lack of concern with these issues which, we believe, will be of vital importance to the consumers/users of these services. We acknowledge that the use of IPTV as a delivery mechanism may be more realistic than reliance upon the identification of sufficient and appropriate spectrum for local television. Nonetheless, we remain opposed to IPTV as a primary delivery mechanism on the grounds that it cannot deliver universal access and departs from the principle of services free at the point of use, delivered over the airwaves.

3 Proposed locations

We are concerned that most licenses are to be granted to run TV stations in large urban areas, many of which are already served by BBC Local Radio, Independent Local Radio and / or local newspapers which are suffering a reduction in advertising revenue. The proposed TV stations will be in competition for a share of this reduced advertising cake. It is a situation in which one or both are likely to fail. We can see little evidence in the choice of locations that local TV is planned for, or considered viable in, rural areas.

4 Media plurality

In addition, whilst noting the comments on current European legislation, we question the proposals set out in the DCMS consultation to:

- remove the 10% independent production content quota from applying to local TV services and
- remove the ownership ceiling for independent producers to have full ownership of local TV services without losing their independent status.

The proposal that one or more independent production companies would be able to own one or more local television stations undermines the fundamental rationale for the current distinction between independent production companies and broadcasters.

These proposals, together with the Media Ownership (Radio and Cross Media) Order 2011, which removed all local cross-media ownership rules, would appear to suggest that a single media organisation will be able run the majority of news services in a local area while at the same time potentially having a large interest in national news provision. This could result in a situation whereby Sky or ITN provided local TV news, while at the same time providing national news output for radio and/or television stations throughout the country. We fail to see how this will increase media plurality.

5 Public opposition to use of BBC Licence Fee

As indicated in our response to the BBC Trust Consultation on the BBC Local Radio Service Review (December 2011) our members, at meetings throughout the country, have expressed anger that the development of local commercial television is being funded by £40 million taken from the BBC licence fee. It seems to them, and to others who have expressed views in other fora, that a proven, popular, universal and valued local broadcasting service (especially in the case of BBC Local Radio) is being sacrificed for an unproven local television service which will only ever be available in limited locations.

Cover sheet for response to a DCMS consultation

BASIC DETAILS

Consultation title:

The role of Independent Producers and Independent quotas in Local TV

To DCMS

Name of respondent: Professor Bob Usherwood Member of VLV Board

Representing (self or organisation/s): Voice of the Listener & Viewer

Address (if not received by email): info@vlv.org.uk

CONFIDENTIALITY

What do you want DCMS to keep confidential?

Nothing + Name/address/contact details/job title

Whole response Organisation

Part of the response If there is no separate annex, which parts?

Confidentiality Statement

No part of this submission is confidential

DECLARATION

I confirm that the correspondence supplied with this cover sheet is a formal consultation response. It can be published in full on DCMS's website, unless otherwise specified on this cover sheet, and I authorise DCMS to make use of the information in this response to meet its legal requirements. If I have sent my response by email, DCMS can disregard any standard e-mail text about not disclosing email contents and attachments.

Name Professor Bob Usherwood 8 March 2012

Signed (if hard copy)