

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



PO Box 401, Gravesend, Kent DA12 9FY  
Telephone: 01474 338711 / 01474 338716  
Fax: 01474 325440

E-mail: [info@vlv.org.uk](mailto:info@vlv.org.uk)  
Web: [www.vlv.org.uk](http://www.vlv.org.uk)

Founded in 1983 by Jocelyn Hay CBE

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**Voice of the Listener & Viewer's**  
**Response to**  
**BBC Trust**  
**Consultation on**  
**REVIEW OF SERVICE LICENCES**

24 September 2012

## **Response from the Voice of the Listener & Viewer to the BBC Trust consultation on Review of Service Licences - September 2012**

*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.*

### **Introduction and background**

VLV Board, Trustees and some of our members were engaged at every stage of the consultation into the current BBC Charter and Agreement. Service Licences were introduced as a result of the 2006 Charter. VLV has responded to consultations on Service Licences since that time.

In 2007 we welcomed the new arrangements but had some concerns outlined in a submission at that time. However in practice service licences have worked well.

We particularly supported the consultation on changes in licences and the regular review of the services incorporated into the process. In our evidence to the House of Lords Select Committee on BBC governance in April 2011 we noted: *Service Licence Reviews are a good way to monitor services and provide licence fee payers with a method to comment on specific services.....Our experience of making regular submissions ..... is that our comments and concerns are noted and often acted upon in subsequent recommendations to the BBC Executive.*

We make this submission with this involvement in the Service Licences as our background.

### **The purpose of the Service licences from the VLV perspective**

We realise that the BBC's commercial competitors are the chief audience and commentators on the licences. However we hope the Trust and Executive appreciate that they are equally significant for the licence fee payer, the viewer and listener who pay for and benefit from the television and radio services. In our 2007 submission we commented . *We welcome the publication of Service Licences as it provides valuable information and a degree of transparency. Listeners and viewers have been given a bench mark with which to assess individual services.* However the licences must be comprehensible to both the commercial stakeholders and the citizens of the UK. At present this is achieved and we hope this continues with the proposed changes.

## Comments

We welcome the planned changes that clarify [1], simplify [2] and update the text [5] and much of [4]. These proposals do not remove or change any of the key points of principle.

We are concerned about the section headed Performance Assessment (page 7 of the consultation document) especially "the plan to simplify the list of performance metrics." For many services we have found these clear statements of hours of content very useful to monitor changes. This will be especially important as the DQF proposals impact on programmes.

This proposal is further elaborated in specific changes proposed for factual programmes on BBC One and BBC Two (page 8 of the consultation document). We note that the Trust considers that other commitments in the service licence form "sufficient protection that these channels will continue to provide the existing range and quality of factual programming and that the numeric conditions do not add any further value to the qualitative commitments." In the light of the DFQ proposals we consider that all qualitative measures should be retained.

Monday 24 September 2012

Robert Clark  
Secretary to the Board of the Voice of the Listener and Viewer

The contact details for this submission is on page one.

None of this evidence is confidential