

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

Founded in 1983 by Jocelyn Hay CBE



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## **RESPONSE BY THE VOICE OF THE LISTENER & VIEWER (VLV)**

### **TO THE BBC TRUST'S CONSULTATION ON A DRAFT DISTRIBUTION FRAMEWORK FOR BBC SERVICES AND CONTENT**

**July 2015**

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DISTRIBUTION FRAMEWORK FOR BBC SERVICES AND CONTENT**

**INFORMATION ABOUT THE VLV**

Voice of the Listener & Viewer Limited (VLV) represents the citizen and consumer interests in broadcasting and speaks for listeners and viewers on the full range of broadcasting issues. It uses its independent expertise to champion quality and diversity in public service broadcasting, to respond to consultations, to produce policy briefings and to conduct research. VLV has no political, commercial or sectarian affiliations and is concerned with the issues, structures, institutions and regulations that underpin the British broadcasting system. VLV supports the principles of public service in broadcasting. It is a charitable company limited by guarantee (registered in England No 4407712 - Charity No 1152136).

**EXECUTIVE SUMMARY**

1. VLV is committed to supporting the principles of Public Service Broadcasting [PSB] and is anxious to preserve the public value of freely available PSB Services and in particular to ensure that those Services reach the public by all practicable and economical means.
2. We therefore welcome this re-iteration by the BBC Trust of its policy regarding distribution of BBC Services and welcome the opportunity to support its provisions.
3. In particular VLV would wish the BBC robustly to protect the Ultra High Frequency [UHF] spectrum and the use of DTT technology as a means to deliver those Services because the majority of viewers use this means of access. Despite other emerging technologies that make claims on the UHF spectrum DTT remains robust and we would expect it to remain so for the foreseeable future well beyond 2020.
4. The widespread use of the internet as a means of accessing BBC Content adds value to viewers and listeners' experiences but remains inconsistent and somewhat unreliable in quality. Until these alternative means of access fully emulate the high quality of service of DTT they should not be given undue preference.

**COMMENTS ON THE DRAFT DISTRIBUTION FRAMEWORK FOR BBC SERVICES AND CONTENT**

5. The VLV welcomes the opportunity to respond to the BBC Trust consultation on the Draft Distribution Framework for BBC Services and Content. As the leading voice in the UK's media industry the BBC should remain the yardstick by which other broadcasters are judged and the setter of the highest standards both of content production and of quality of service in its delivery. Unless it is enabled to maintain such a position it cannot fulfil its duties to the public.
6. VLV interests focus on the principles of PSB and we support the Trust's policy as described in this Draft Framework. In being dependent on third parties for distribution

facilities the BBC must clearly assure itself that all public interests are protected when arranging for the provision of those facilities, in particular, there must be no loss of editorial control and content must be freely and easily accessible with minimal additional cost.

7. We recognise the changing background to the dissemination of audio visual content and the rapid evolution of different means of delivery in recent years. The BBC response to the opportunities presented is welcomed and is appropriate as part of its duties to the public.
8. However, it is clear that in meeting new challenges the BBC must be mindful of the economic impact of a widening range of delivery channels requiring different editorial approaches and also fully aware of the public preferences for content consumption. Whilst new means of accessing content via the internet are available they do not as yet dominate listening and viewing and for certain types of content will be unable to render the full quality available. Mainstream consumption and quality of service via traditional delivery methods must not be compromised in accommodating these new distribution methods. Whilst the iPlayer is widely used variable internet consistency of service especially during periods of heavy loading prevents it from functioning adequately and universally [ie in terms of equivalent coverage] and so cannot yet be considered a replacement for more established delivery methods.
9. One specific area of distribution that is of great concern at the present time is the increasing pressure on spectrum most notably for Digital Terrestrial TV [DTT] in the UHF bands. Already, as a result of Digital Switchover in 2012 and the recent decision by OfCom to reclaim the so-called 700 MHz band in around 2020 or sooner, a considerable amount of spectrum has been taken from the traditional broadcast bands in the UHF. This challenges broadcasters with the potential costs and inconvenience involved in accommodating existing services in less spectrum. More importantly it also challenges a public that has little knowledge of these changes and the costs which they will have to bear in responding to changes in reception conditions eg new technical standards and hence new equipment.
10. VLV has responded to several recent consultations on spectrum issues both within the UK and Europe and has been forthright in protecting PSB from the consequences of proposed changes. We would expect that the BBC would also take a leading role in assuring itself that the proposed reductions in spectrum over the next Charter period will not compromise its PSB duties and will not place unreasonable burdens on the public which it serves and who funds its operations.