

*"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 TO THE BBC TRUST FAIR TRADING POLICY REVIEW

BACKGROUND TO VLV

The Voice of the Listener & Viewer (VLV) is an independent, non-profit-making membership 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 is a charitable company limited by guarantee.

For over 30 years VLV has played a unique role in keeping a citizen's eye on major legislative proposals and action taken by regulators and broadcasters, enabling the voice of consumers to be heard, independently from the interests of political parties, industry players and other pressure groups.

FAIR TRADING

VLV considers that the BBC Trust maintains a comprehensive set of fair trading policies which in the main are systematic and relevant. In general VLV supports these and believes they are reasonably devised and implemented, as the relatively small number of recent fair trading complaints would suggest. However since serious complaints about fair trading and competitive impact generally come from those with a commercial interest rather than from members of the general public, the low level of complaints might also suggest that current policies work in the best interests of commercial parties and that considerable (arguably excessive) weight is given to those interests.

VLV does not wish to comment on the detail of these policies but, as a consumer body representing the interests of BBC audiences and supporting diversity in public service broadcasting, it urges the Trust to ensure that it does get the overall balance right. Fair trading and competitive impact policies should not unnecessarily hinder the provision of excellent services and content and, in applying these policies rigorously, the BBC should not lose sight of the overall priority of serving the licence fee payer.

Of course VLV recognises the complex commercial and legislative environment in which the BBC now operates and the imperative not to put the licence fee or BBC reputation at risk through exposure to legal or other challenge. However it considers that there may have been occasions in the past when competition considerations have predominated to the detriment of the interests of audiences and service users. VLV urges the Trust to ensure that it fully understands and takes into account those audience interests in order to reach balanced decisions.

30 May 2014

From the Trustees of VLV