

Consultation response form

Your response

Question	Your response
Question 1: What are stakeholder views on how Ofcom should assess and measure BBC performance?	No comment
Question 2: Do you agree with the proposals for Public Purpose 1? If not, please explain why.	With a view of the proposed changes to BBC News in April 2023, I do not think it is appropriate for all conditions to be removed from the BBC News Channel.
	I agree the current condition does not add much value for the reasons you cite.
	However, from the BBC's proposals that have been made public so far, it appears the News Channel will be reduced to a service effectively simulcasting output that is already on BBC One, BBC Two or, at other times, running a single service across the UK and the World, effectively a simulcast of what's currently shown on BBC World News. Even the proposed BBC Radio 5 Live simulcast in the morning will also be shown on BBC Two, meaning the programme will be broadcast simultaneously across three BBC outlets.
	The BBC itself talks of a "new TV news channel" [BBC Media Centre], yet Ofcom has indicated so far it does not consider this to be a new service, but an "editorial change" [Ofcom statement 26/08]
	It's clear that removing the current requirement to screen more local and regional news is currently stopping the BBC combining more of BBC News and BBC World News together. Most of its evening and overnight schedule are already simulcasts.

Conditions have been imposed on various BBC channels, including BBC Three, notably in the arena of news and current affairs, to help make them distinct from commercial operations and to add value to viewers. Going forward, is it reasonable for the BBC's TV news service to be without any condition, and to effectively operate a commercially-focussed service in the UK through the back door?

May I suggest a replacement condition? To ensure the service continues to add value to UK audiences with news relevant to them, I propose:

"The BBC News channel must provide a platform for in-depth news coverage from across the UK above and beyond programmes simulcast from BBC One and BBC Two."

Yes, such a condition lacks a strict quota. But it is in line with the new style, less-prescriptive conditions Ofcom is proposing across BBC services. And it still gives the BBC great flexibility while at the same time ensuring licence fee payers are offered more UK-specific news of relevance to them.

If such a condition is not imposed immediately, Ofcom should consider its options for introducing such a condition in the future. I note Ofcom has already indicated it could impose further conditions on BBC News as details of the BBC's plans emerge.

I would like to remind Ofcom that BBC World News currently has daily bespoke programmes dedicated to news and business news from Africa, Asia and the USA. It would be very odd for BBC News to find time for such programmes without anything specifically for the UK beyond existing simulcasts.

Although the BBC says it will be able to split the channel for UK breaking news, the events of the last week with regards the new PM and the death of HM Queen Elizabeth II illustrate many such breaking news events would be shown on BBC One anyway, so the promised ability to run a UK opt-out may not add much value to viewers in terms of what would normally be available to them.

Ofcom and the BBC correctly argue more news is being consumed online. However, as we can see from GB News and TalkTV, the main linear news channel provides a foundation from where clips are posted on social media, YouTube and other outlets. The news channel ratings are secondary, with owners eagerly viewing social media metrics. At little extra cost, material can be reused to reach a diverse range of audiences and platforms.

Without the BBC News Channel generating UKspecific content, where is this online content going to come from?

Will the BBC have a dedicated team creating such moments from scratch? The last time this was attempted – when BBC Three went online in 2016 and promised a daily drop of curated online content specifically designed for young audiences – it wasn't overly successful and in 2019 Ofcom noted the BBC was failing audiences, with BBC Three failing to deliver.

News & Current Affairs programmes on the iPlayer:

If the BBC plans to boost its online news and current affairs provision, it would be a shame if programmes created for the iPlayer weren't repeated on a linear channel for the benefit of the digitally excluded. After all, pre-digital switchover, BBC One and BBC Two showcased BBC Three and BBC Four content for similar reasons. This is a differential between commercial and public service broadcasting and allows the BBC to fill schedules with already commissioned iPlayer programmes at little extra cost.

Question 3: Do you agree with the proposals for Public Purpose 2? If not, please explain why.

In agreement.

Question 4: Do you agree with the proposals for Public Purpose 3? If not, please explain why.

Confidential? – N In agreement.

Question 5: Do you agree with our preliminary view on the BBC's request to change Operating Licence conditions 2.21 and 2.32 for BBC Four, including our proposal to remove BBC Four's peak original productions quota and set the 'all hours' quota at 65% instead of 60% as requested by the BBC? If not, please explain why.

Confidential? - N

In agreement. It is important BBC arts and culture content can reach the widest audience possible, and if the solution is to move content to BBC Two, effectively reversing a move made 20 years ago, then so be it.

Question 6: Do you agree with the proposals for Public Purpose 4? If not, please explain why.

Confidential? -N

Broadly yes. It is important programming sharing across BBC Local Radio in England is monitored. In some areas, the BBC Local station is the only remaining radio station in a given location following consolidation in the commercial radio industry.

I note with concern the BBC's plans to close BBC One opt-out services for Cambridge and Oxford.

Question 7: Taken together, do you agree with the proposals for a new Operating Licence? If not, please explain why.

Confidential? - N

You state in 1.7 that "in order for audiences and stakeholders to be confident about the BBC delivering its Mission and for Ofcom to be able to step away from detailed regulation, the BBC must explain its strategy and plans better and be much clearer about where it is already delivering for audiences and where it can do better."

The planned changes to the BBC News Channel is evidence this is currently not taking place and needs to improve urgently.

Additionally, as the BBC makes other changes to its services, to streamline its organisation and reduce costs, the BBC needs to do better at explaining why services need to close, merge or change. It must provide clear metrics for any such decisions that are easily available in the public domain.