

Consultation response form

Your response

Question	Your response
<p>Question 1: What are stakeholder views on how Ofcom should assess and measure BBC performance?</p>	<p>MG ALBA is concerned that the proposed Licence understates significance of the BBC ALBA service by dealing with it exclusively under Public Purpose 4.</p> <p>BBC ALBA is the fulfilment of UK Government policy for the provision of a PSB service in Gaelic (in satisfaction of obligations assumed by the UK in terms of Article 11, European Charter for Regional or Minority Languages) and therefore the four public purposes of the BBC ought to apply to its output.</p> <p>BBC ALBA serves users of Gaelic across the UK as well as attracting a significant UK-wide viewership by many who are not users of Gaelic but who can access it through English language translation subtitles and the visually and musically rich nature of its output.</p>
<p>Question 2: Do you agree with the proposals for Public Purpose 1? If not, please explain why.</p>	<p>The general requirements for News should apply equally to Gaelic as to English output.</p> <p>The proposal to maintain the current BBC ALBA quota (set out under Public Purpose 4 at 9.53) fails to discuss how maintenance of this quota will assist the BBC in fulfilling the two objectives set out for Public Purpose 1 (News) through the medium of Gaelic.</p> <p>For example, 6.15 states that <i>“the second objective is intended to ensure that the BBC reaches all audiences with its news and current affairs content. To ensure that the BBC meets this objective, we consider that Public Purpose 1 should contain a mix of</i></p>

	<p><i>quotas and Licence conditions which apply to specific services. It should make sure that news and current affairs content is easily discoverable on its services.”</i></p> <p>The News output of the Gaelic service should also meet this objective but is not clear how 9.53, which says “We will also retain the requirements on news for BBC ALBA and BBC Scotland” addresses that.</p>
<p>Question 3: Do you agree with the proposals for Public Purpose 2? If not, please explain why.</p>	<p>We are concerned that the statement at 7.12 “We cover BBC ALBA’s Gaelic language learning condition in Section 9 under Public Purpose 4, together with other indigenous language requirements” underplays the nature of the Gaelic service.</p> <p>The Licence as drafted risks portraying BBC ALBA as a geographically restricted aid to learning the Gaelic language (in addition to the delivery of News based on historical precedent). Any direction of the Licence towards that understanding, at the expense of its full PSB function, would be detrimental.</p> <p>BBC ALBA’s function includes all forms of learning offered by PSB services in any language. [In fact there is a good argument that English language services of the BBC should offer Gaelic language learning and that it is the BBC generally – and not BBC ALBA specifically - that should be subject to this requirement under Public Purpose 2 and not Public Purpose 4.]</p> <p>For this reason we are concerned that the proposals made under Public Purpose 4, at 9.67 and 9.68, do not address the points we made in our earlier submission. Gaelic language learning is a matter for the BBC generally, one to which many different BBC services should contribute, both audio and audio-visual.</p>
<p>Question 4: Do you agree with the proposals for Public Purpose 3? If not, please explain why.</p>	<p>We note the move towards affording the BBC greater flexibility as to the platforms on which first run originations will be shown, and we note that Ofcom deals this Public Purpose 3 in respect</p>

	<p>of Gaelic under Public Purpose 4, which as previously stated remains a matter of concern to us.</p>
<p>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.</p>	<p>No response</p>
<p>Question 6: Do you agree with the proposals for Public Purpose 4? If not, please explain why.</p>	<p>We have already commented on News and Learning. We point out that the genres of Drama and Comedy in Gaelic are equally grave concerns and that, if specific genres are to be mentioned in the Licence, Drama, Comedy, Childrens and others too should be included and subject to clear requirements.</p> <p>As such we welcome the commitment at 9.69:</p> <p><i>“We also propose to introduce transparency requirements regarding the BBC’s delivery of Gaelic content more broadly across its relevant TV services. As part of this, we propose that the BBC must set out its planned hours and first-run hours of Gaelic on BBC ALBA and BBC iPlayer and report on delivery with its Annual Report.”</i></p> <p>MG ALBA suggests that this should be expanded so as to require the BBC to demonstrate how the planned hours and first run hours together across all PSB genres will ensure a comprehensive multi-genre PSB service in Gaelic that successfully reaches and satisfies its intended audiences.</p> <p>To address reach, MG ALBA would also suggest that the BBC must be compelled to address accessibility and discoverability of content in relation to Gaelic services. This must be a priority in relation to the iPlayer where the volume of English language content can dilute the ability to</p>

	<p>engage with media in the indigenous minority language.</p> <p>The content which is recommended to audiences must deliver on the need to ensure that all BBC audiences are aware of indigenous language content and that it is easily accessible.</p> <p>If the issue of discoverability of Gaelic language content is not addressed, there is a real danger that the changes to the Operating Licence will fail to provide any significant measures which will protect and secure indigenous language media as the BBC moves forward in its aspiration to be a digital first public service media organisation.</p>
<p>Question 7: Taken together, do you agree with the proposals for a new Operating Licence? If not, please explain why.</p>	<p>MG ALBA is seeking an operating licence which is fair and contains safeguards for Scottish Gaelic media, which will ensure that the BBC are delivering for audiences in fulfilment of its Mission and delivery of the public purposes. The changes to the operating licence are in danger of presenting a narrow focus on BBC ALBA and its output which will be detrimental and does not focus on ensuring that the BBC delivers a complete PSB service for audiences.</p>