

Consultation response form

Your response

Question	Your response
	<p>MG ALBA's further response to Ofcom's consultation on the proposed BBC Operating Licence <i>January 2023</i></p> <p>This is a response from MG ALBA to Ofcom's consultation on the BBC's request to change the Operating Licence in relation to requirements for BBC Radio 5 Live, BBC Radio 2 and programming of a national or regional interest.</p> <p>MG ALBA notes the material nature of the reductions in quotas for BBC One and BBC Two "opt out" services – ranging from almost 9% to 64% - but makes no comment in relation to the three specific questions asked in the consultation.</p> <p>The material extent of the proposed reductions in quotas prompts MG ALBA to make the following additional points.</p> <p>Pan-BBC flexibility is not appropriate for BBC ALBA</p> <p>The flexible approach to allowing the BBC to fulfil its mission across services and platforms in the English language is not appropriate for Gaelic language services, BBC ALBA and BBC Radio nan Gàidheal. BBC ALBA, as the UK's only Gaelic language PSB video service, is able to offer only an average of 1.8 hours of first run programmes each day and cannot afford to reduce its first run output further. Any pan-BBC approach which might result in the loss of output on BBC ALBA to other BBC video services (which are all in English) may be seen as a net-nil from a pan-BBC perspective but will represent an overall loss for Gaelic language media and for MG ALBA, who are partners in BBC ALBA.</p> <p>BBC ALBA as a PSB service in its own right</p> <p>In this respect we wish to make the following additional comments about the transparency require-</p>

	<p>ments set out at 4.68 of the draft Operating Licence. These require the BBC to set out “<i>planned hours of Gaelic, of Irish, and of Ulster-Scots programming; and planned hours of First-Run UK Originations of Gaelic, of Irish and of Ulster-Scots programming</i>”. The draft provision creates a false sense of equivalence by dealing with the BBC’s plans for Irish and Ulster Scots output in Northern Ireland in the same provision that deals with the BBC’s plans for Gaelic output on BBC ALBA. The obligations on the BBC in relation to BBC ALBA should be distinct and recognise the standalone PSB nature of the service; whereas the expectations on BBC Northern Ireland will surely reflect the fact that it is an “opt-out” service in a territory that is already served by an Irish language PSB video service.</p> <p>MG ALBA asks Ofcom to de-couple BBC ALBA from the provisions for transparency regarding output in Ulster Scots and Irish and – considering the material reductions being proposed to quotas elsewhere - to strengthen the transparency requirement so as to require a statement of how BBC ALBA’s output will fulfil the BBC Framework Agreement description of BBC ALBA as a “mixed-genre [PSB] television channel for Gaelic speakers and those interested in the Gaelic language and culture, provided by the BBC in partnership with MG Alba.”</p> <p>Learning – a BBC purpose or a BBC ALBA output? We reiterate our view that Gaelic language learning should be dealt with under BBC Public Purpose 2. The focus of BBC ALBA should be on its multi-genre PSB nature.</p>
<p>Question: Do you agree with Ofcom’s provisional assessment and its proposed changes to the Operating Licence for news and current affairs on BBC Radio 5 Live? If not, please explain why, providing appropriate supporting evidence where possible.</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>
<p>Question 2: Do you agree with Ofcom’s provisional assessment and its proposed changes to the Operating Licence for live music on BBC Radio 2, including the view that new live music is more valuable to audiences than repeats? If not, please</p>	<p><i>Is this response confidential? – Y / N (delete as appropriate)</i></p>

explain why, providing appropriate supporting evidence where possible.

Question 3: Do you agree with Ofcom's provisional assessment and its proposed changes to the Operating Licence for Programmes of a national or regional interest? If not, please explain why, providing appropriate supporting evidence where possible.

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