

## Your response

Question	Your response
<p><b>Question 1: Do you agree with our assessment of the potential impact on specific groups of persons?</b></p>	<p>Yes, in part. I agree that the overall impact of the proposals will have a positive. The suggestion that younger audiences will benefit from the lunchtime news requirement being removed, so that more can be invested into digital services, is sound. As is pointed out, some groups may be adversely affected, though there are mitigations. I agree with the decision to maintain the nations and regions quotas.</p>
<p><b>Question 2: Do you agree with our Welsh language impact assessment?</b></p>	<p>Yes.</p>
<p><b>Question 3: Do you agree with our proposed approach to setting the new Channel 4 licence?</b></p>	<p>Yes. It is correct that since the last licence was granted the broadcasting sector has changed massively. As cited, the 72% decrease between 2014 and 2022 of broadcast TV viewing among 16-24 year olds is seismic. As such, PSBs can – and should be, within limits – be expected to adapt to changing television viewing trends, and to be given appropriate regulatory scope to do so within their licensing conditions. Channel 4 is particularly exposed to changing trends among the UK’s PSBs, as it is both solely reliant on commercial income and at the same time cannot currently make programmes for Channel 4. The consultation is correct to point out, drawing on the audience data, that Channel 4 occupies a different space to the other PSBs, and has a different tone. Channel 4’s <i>Future4</i> strategy is rightly ambitious, and the broad direction of these changes will help enable it to further transform to becoming a digital-first PSB. As I set out below, however, there are limitation to this. As such, Ofcom is right to take an approach to “strike a balance” in the way articulated here.</p>
<p><b>Question 4: Do you agree with our proposal to retain the condition requiring not less than 208 hours of news programmes in peak viewing time to be included in the Channel 4 service in each calendar year of the licensing period?</b></p>	<p>Yes. Securing strong levels of news programming is a key differentiator for a PSB, as compared to commercial rivals. It is a core way that the framework for PSB in the UK can maintain its relevance. That Channel 4 has delivered above the quota in the current licence period is welcome. While the consultation document notes that Channel 4</p>

	<p>has expanded on its non-broadcast news provision (eg. TikTok), Ofcom news consumption data clearly bears out the importance that the audience places on television news. While Online will shortly become the main source of news for news ‘nowadays’, and likely to pass television in the next couple of year, that it has taken to the mid-2020s for that to happen is very noteworthy. Finally, the audience views set out on the distinctive nature of Channel 4 news, and the age profile of its audience, go to underlining the importance of maintaining provision at this level.</p>
<p><b>Question 5: Do you agree with our proposal to remove the lunchtime news scheduling requirement?</b></p>	<p>Yes. Most compellingly, the fact that the “bulletin accounted for only 1% of Channel 4’s total overall news viewing” means that it plays a very limited role in Channel 4’s overall crucial news provision (as outlined above).</p>
<p><b>Question 6: Do you agree with our proposal to retain the weekend news scheduling requirement?</b></p>	<p>Yes. In contrast to the previous question, weekend news consumption on the Channel leads to a contribution of “14% towards Channel 4’s overall news viewing”. I agree with Ofcom when it states that “we do not think a gap in daily news provision would be appropriate for audiences or for the fulfilment of the PSB objective”.</p>
<p><b>Question 7: Do you agree with our proposal to require that there are not less than 178 hours in each calendar year of the licensing period of current affairs programmes included in the Channel 4 service which are of high quality and deal with both national and international matters? Do you agree with our proposal to retain the requirement that 80 hours of the 178 hours must be in peak viewing time?</b></p>	<p>No. In its submission, Channel 4 has suggested that in reducing this quota from not less than 208 hours to not less than 178 hours would help support its “digital-first current affairs content”. While it is noted that some of the digital commissioning could then be later broadcast, and that there is “headroom” due to delivering above its current quotas, this would be a regressive step. Ofcom’s objectives of PSB state that PSBs should “facilitate civic understanding and fair and well-informed debate on news and current affairs”. As one of only five PSB providers in the UK (including S4C), the imperative that strong levels of PSB current affairs provision are maintained remains important for the following reasons: (i) as is set out in the <i>Jigsaw Channel 4 Corporation Relicensing Research report</i>, “Channel 4 was perceived to provide unbiased news and current affairs coverage from a more human angle than other providers and representing a diverse range of people on screen was perceived as a strength”. Moreover,</p>

	<p>Jigsaw reports among those who consume lots of Channel 4 content, the broadcaster is seen a provider of “... of a less establishment alternative to the BBC, championing diverse and challenging viewpoints, providing gritty, authentic, and truthful news and documentaries...”. Channel 4 plays a very crucial role in this area, and scaling this back, – despite the “headroom”, would be a regressive step (even if it is anticipated that the effects of this change will take a long time to be seen); (ii) while this move would free up Channel 4’s budget to spend more on digital commissioning, there is the danger of a <i>fait accompli</i> position emerging vis-à-vis broadcast provision ie.: if the PSBs begin to lose what makes them distinctive in terms of broadcast provision, the argument and the rationale for PSB are weakened – regardless of what you do online. And so the decline of PSB becomes as <i>fait accompli</i>. Separately, and in either eventuality, it is correct that 80 hours be maintained in peaking viewing time.</p>
<p><b>Question 8: Do you agree with our proposal to require that:</b>  <b>a) at least 45% of the hours of programmes included in Channel 4 in each calendar year are originally produced or commissioned for the service; and</b>  <b>b) at least 70% of the hours of programmes in peak viewing time are originally produced or commissioned for Channel 4?</b></p>	<p>a) No, there should be no reduction from 56% to 45% in programmes originally produced or commissioned for the service. As I have previously argued, production quotas for originally produced or commissioned services are a key way that differentiates the UK’s commercial PSBs from other broadcasters (<a href="https://doi.org/10.1177/1527476416677113">https://doi.org/10.1177/1527476416677113</a>). There was already a reduction from 60% to 56% between the 2004 and 2013 quotas, and thus a shift to 45% would represent a very substantial drop over a 20-year period. The point, “Given that Channel 4’s daytime audience is relatively small and, if current trends continue, likely to drop further, we think that reducing the amount of original productions in daytime is unlikely to have a significant negative impact on audiences” seems to be accepting of a position of decline for PSB, rather than trying to find alternative ways to solve the underlying issues – which primarily stem from funding. It is welcome that Ofcom has stuck to 45%, rather than going as low as 40%, and yet a reduction to 50% would be more appropriate. There are of course wider trends around changing viewing habits, but a reduction to 45% is a regressive step. b) Separately, and in either eventuality, I agree</p>

	<p>that the “at least 70% of the hours of programmes in peak viewing time” clause be maintained.</p>
<p><b>Question 9: Do you agree with our proposals to retain the requirements that, in each calendar year, at least 35% of the hours of programmes made in the UK for viewing on Channel 4 must be produced outside the M25, and at least 35% of expenditure on programmes made in the UK for viewing on Channel 4 must be allocated to the production of programmes produced outside the M25 and must be referable to programme production at a range of production centres?</b></p>	<p>Yes, on both counts. It is welcome that Channel 4 has consistently delivered more than the quotas on both the Made Outside London and Made Outside England measurements. Ensuring that the broadcast production sector can be sustained across the UK, and not just within the M25, is a key way that PSB licences act as a policy lever to see a more equitable spread in funding and jobs around the UK. As is pointed out in the main consultation document, the SVoDs performance in these areas is much smaller than for the PSBs. It is welcome that Channel 4 itself suggested that both quotas be retained. The evidence as set out, to show why the quotas should not be increased, is sound.</p>
<p><b>Question 10: Do you agree with our proposals to retain the requirements that, in each calendar year, at least 9% of the hours of programmes made in the UK for viewing on Channel 4 are produced outside England, and in each calendar year at least 9% of its expenditure on programmes made in the UK for viewing on Channel 4 is allocated to the production of programmes outside England and referable to programme production at production centres in Scotland, Wales and Northern Ireland?</b></p>	<p>Yes, on both counts. As noted above, it is welcome that Channel 4 has consistently delivered more than the quotas on both the Made Outside London and Made Outside England measurements. As shown on p.65, Channel 4 delivery on hours and spending Made Outside England show that quotas are the key factor here – indeed, without the demanding 9% quota it is not likely that so much delivery would occur outside England. Ensuring that Scotland, Wales and Northern Ireland benefit from Channel 4 is a key concern when the wider PSB ecosystem is addressed, and again a core – and necessary – plank in making and sustaining the argument for the PSB regulatory system. That said, it is worth noting that in terms of how that money is distributed in the nations, there is inequity in the case of Northern Ireland. In my recent PSB monitoring report (<a href="https://pure.ulster.ac.uk/ws/portalfiles/portal/128036793/Ramsey-PSB-Report-2023-Final.pdf">https://pure.ulster.ac.uk/ws/portalfiles/portal/128036793/Ramsey-PSB-Report-2023-Final.pdf</a>) I pointed out that “in the ‘originated content’ category of spending in Scotland, Wales and NI (£45m), £5m of this was spent in NI (up from £3.5m the previous year) – this equates to 11% of all spending in this category. However, NI makes up 18% of the UK’s population among the nations, and so NI is underrepresented in this category.” This is outside of the scope of this consultation</p>

	precise question, and yet worth noting as part of overall discussions on this topic.
<p><b>Question 11: Do you agree with our proposal to retain the requirement to transmit at least half an hour of schools programmes, excluding presentation material, in each calendar year of the licensing period?</b></p>	<p>Yes. The current quota is already exceptionally low, with Channel 4 delivering hugely above it over many years (28.6 hours in 2016, though this has dropped to 9.4 hours in 2022). Ofcom’s rationale for maintaining it, until the legislation changes, make sense within the scope of this exercise. And yet, Channel 4 should be monitored across its other non-linear activities to ascertain the ways in which, and the levels at which, it is providing different kinds of content for school-age children – such as through the existing SMCP reporting.</p>
<p><b>Question 12: Do you agree with on our proposal to retain the condition that provides that in each calendar year not less than 25% of the total amount of time allocated to the broadcasting of qualifying programmes on Channel 4 must be allocated to the broadcasting of a range and diversity of independent productions?</b></p>	<p>Yes. Channel 4 has made no application for it to be reduced, and it has delivered vastly above the 25% quota over many years.</p>
<p><b>Question 13: Do you agree with our proposal that the Channel 4 licence should be renewed for a period of ten years?</b></p>	<p>Yes. As is noted, “... we recognise that there remains a significant degree of uncertainty, and these forecasts, and C4C’s business plan, are not without risk”. While we can observe the broad market trends in relation to commercially funded PSB in the UK, there always remains the possibility that there could be a rapid shift in Channel 4’s financial position if television advertising revenues decline even more rapidly than has been factored in. That said, the broadcaster has shown itself to be financially resilient, well-managed, and operating strongly under its current governance model. In giving it a ten-year licence, as opposed to a five year one, Channel 4 can put in place long term and prudent plans. This will in turn make it more likely to be financially sustainable.</p>

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