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By post and email: bbcperformance@ofcom.org.uk

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Dear Jacqui

I am writing on behalf of the Radio Forum which consists of the Personal Managers Association (PMA), the Society of Authors (SoA) and the Writers' Guild (WGGB). We represent the majority of UK radio writers as well as those who work in television, film and other such broadcasting media within the UK and abroad. We have a direct interest in the future of the BBC radio, and having only just been made aware of the suggested operating framework for BBC's UK Public Services, would like to make some initial suggestions. In future we would appreciate being directly contacted when consultations are launched so that we have time to consult our members.

We welcome the increased commitment to religion and arts programming and believe that the remaining proposed quotas are desirable. However, we are deeply concerned by the removal of drama and comedy quotas from BBCR3 and 4 – clearly, in the absence of any UK PSB competition in this genre, two of its most distinctive outputs.

The BBC's draft Annual Plan does not currently say that it intends to reduce its commitment to drama and comedy, but with increased funding pressures on BBC Radio it is inevitable that they will begin to cut further in to what is their most expensive programming. Over the last decade, with quotas in place, we have already seen a reduction in bespoke drama commissions, the removal of drama from the World Service, the Friday Play from R4 and The Wire from R3, the latter two strands being more innovative and experimental forms which attracted a younger demographic. It is notable that since The Wire's demise R3 has disappeared from Imison and Tinniswood Award listings when previously R3 plays regularly won or appeared on the shortlists.

With the exception of three dramas commissioned next year by Russian playwrights R3 dramas are now largely adaptations of stage-plays. These are 'new' and 'original' productions, but can hardly be said to be content specifically for radio by radio dramatists.

Drama makes a significant contribution to our cultural landscape, yet unlike music, it is barely mentioned in the Ofcom consultation. The Radio drama department is seen very much as a patron of the arts - nurturing new voices, helping sustain established voices, seeding writers of all genres and disciplines. Writers value the immediacy, intimacy and unparalleled freedom that writing for radio can bring. Audiences, no matter where they are, can access the best the UK has to offer – and with the iPlayer, at a time of their choosing. Drama and comedy programmes attract significant audiences and the Audience Appreciation figures are high. It is worth noting that Radio 4's Afternoon Plays each get a bigger audience on one day (around 1 million) than the National Theatre gets in all its South Bank venues in a year.

The BBC should not narrow its agenda because certain kinds of programmes are done on commercial channels. The only potential competitor to the BBC for drama, comedy and readings is Audible who mainly produce unabridged readings geared to the American market available on a commercial basis.

We appreciate that significant cuts have to be made at the BBC overall, but radio producers have always worked to tight budgets and consequently the smallest cuts are felt more deeply here than with TV. The consequence of fewer commissions will be less innovation and risk-taking, less diversity, less choice, more repeats, and more reliance on out of copyright works rather than contemporary commissions. This is not best serving the UK audience and will have a devastating impact on our members.

We believe that the removal of quotas for these two genres will damage the BBC's commitment to original productions, their distinctiveness of output and will not serve audiences well. It is rather ironic that these quotas are being discontinued when children's programming quotas for TV broadcasters are being reintroduced. We should learn the lesson from the removal of those children's quota obligations in 2003. Original spend fell from £140 million to £77 million in 2015, with the BBC (who still had quotas to fulfil) accounting for 90% of all UK originated commissions. If the BBC reduces their original productions of radio drama and comedy, there is no alternative broadcaster in a position to offer writers similar commissions.

Yours sincerely

A handwritten signature in black ink that reads 'Joanne McCrum'.

Jo McCrum
Assistant Chief Executive