## **Michael Richards**

## Your details

Full name:	Michael Richards
Representing:	Individual

## Your response

<i>Q.</i> 1 Do you agree with our overall approach to setting the operating licence?	Yes
Q. 2 Do you agree with the approach we have proposed for public purpose 1, including the high-level objectives and regulatory conditions we are proposing?	When you talk about England, I would like a far more specific approach to the Regions. The BBC hide behind the general England term to completely ignore the Midlands Region in production terms, although we provide them with a significant amount of cash. No peak time production is produced in the Region and no reflection of the area in national programmes. The Midlands has been decimated creatively with both the BBC and ITV being allowed to completely withdraw network production from the Region, it is a complete disgrace. The BBC hide behind the office jobs created in the Mailbox, and although welcome, they are not creative production positions.
<i>Q. 3 Do you agree with the approach we have proposed for public purpose 2, including the high-level objectives and regulatory conditions we are proposing?</i>	Again, not specific enough in relation to the English regions. The BBC will quote that more than 50% of Network production takes place outside of London. The Midlands receives 1.8% of that, the smallest amount to the largest contributing Region. We must have Regional quotas imposed on the BBC as well as National.
Q. 4 Do you agree with the approach we have proposed for public purpose 3, including the high-level objectives and regulatory conditions we are proposing?	Yes, generally a constructive set of proposals. However, again I am concerned that the BBC will hide behind production investment in London, Salford and Bristol, to claim job done in England and continue to treat the Midlands as a production wildernesses.

Q. 5 Do you agree with the approach we have proposed for public purpose 4, including the high-level objectives and regulatory conditions we are proposing?	Again, generally yes, however, I believe a much more specific measure of production in the Regions is required to ensure the Midlands is treated with the relevance that has been missing since the BBC pulled out of Pebble Mill.
<i>Q.</i> 6 Do you agree with Ofcom's approach to how we will set and amend the operating licence, as set out in Annex 5?	Yes, but again I am concerned the BBC will exploit the lack of Detail in the English Regions to "spin" their way out of Network Production in the Midlands, by somehow creating the impression that an office job is a substitute for a creative Production Centre role. Joe Godwin, our BBC Director talks about Production Facilities being out dated, whilst the organisation he represents has just placed significant orders for equipment to be used in refurbished Studios in London
<i>Q.</i> 7 Do you agree with our proposed overall approach to performance measurement?	Again I would like to see more detail regarding the English Regions.
<i>Q.</i> 8 Do you agree with the proposed framework of: availability; consumption; impact; contextual factors?	Again, the BBC need to be held to account more specifically in the English Regions. They believe that the investment into Salford means job done, what effect has that had on Birmingham?
<i>Q. 9 Do you agree with Ofcom's approach to how we will set and amend the performance measures?</i>	You need to force the BBC to do more for the Regions, particularly the Midlands, and cut through the spin which they will role out. Lord Hall states that the Midlands is important to the BBC, prove it with investment in Production in the Region.