

## Your response

Question	Your response
<p><b>Question 1: Do you agree with the proposed scope of the review of BBC regulation as set out in this document? If not, please explain the areas where you think changes should be made.</b></p>	<p>MG ALBA agrees that the review should cover all areas of Ofcom's regulation of the BBC</p>
<p><b>Question 2: Do you agree with the proposed approach to reviewing the BBC Operating Licence? If not, please explain why.</b></p>	<p>MG ALBA agrees with the approach that the review should ensure the BBC operating licence is fit for the future and remains as effective as possible. The operating licence must ensure the BBC's mission and public purposes are fulfilled in a transparent manner, not least in indigenous minority language media provision which is a key pillar in delivering its commitments to our nations and regions, as well as its role in the creative economy.</p>
<p><b>Question 3: Do you have any views on how to measure the BBC's performance?</b></p>	<p>MG ALBA has been concerned for some time that the BBC's approach to Gaelic media service provision is seriously deficient in terms of commitment, transparency, accountability and sufficiency of investment.</p> <p>As such, MG ALBA is concerned by Ofcom's proposals 'that the BBC should have scope to determine how best to fulfil its Licence obligations across its platforms and services, provided it sets out publicly how its plans deliver the Mission and Public Purposes'.</p> <p>The BBC's role in Gaelic media provision needs to take into account that:</p> <ul style="list-style-type: none"> <li>• BBC ALBA is a partnership service with MG ALBA;</li> <li>• There a current BBC policy vacuum in respect of indigenous minority language media in general and Gaelic in particular;</li> <li>• There is no statutory provision or body which holds the BBC to account for sufficiency of provision and failure to afford parity of esteem to Gaelic media as compared to Welsh language media.</li> </ul>

	<p>The absence of an adequate statutory framework for Gaelic media provision, for so long as that prevails, creates a compelling argument that the BBC should only determine how best to fulfil its Licence Fee obligations in respect to Gaelic media when its partner MG ALBA, UK Government and Scottish Government (as funder of MG ALBA) have been consulted and are in agreement.</p> <p>MG ALBA endorses the approach that regulation of the BBC should combine quantitative requirements with ‘requirements which focus on how the BBC delivers for audiences, using measures such as the quality, reach and impact of programming (qualitative requirements).’</p> <p>This will allow for a more accurate appraisal of output which helps successfully fulfil the BBC’s mission &amp; public purposes, for example indigenous minority language media, yet does not have the same visibility as mainstream content. It is important that this is in addition to the key requirements of specific criteria, such as targets, which are an important mechanism in seeking to achieve principle of parity within indigenous minority language provision.</p> <p>Additional quantitative reporting requirements will allow more transparency on the delivery and quality of output. For example, in respect of BBC ALBA, the BBC is obliged to ensure live news each weekday evening, including peak viewing time, and a longer news review at the weekends. The simple delivery of this is not enough without a clear assessment of its quality, impact and accessibility to audiences. Simply providing the service does not equate to fulfilling the obligation in relation to audiences. Therefore, the introduction of using measures such as reach, quality and impact would have a significant impact in the transparency of service provision and offer more accountability.</p>
<p><b>Question 4: Do you agree with our proposed scope of the review in relation to content standards? If not, please explain why.</b></p>	

**Question 5: Do you agree with the issues we have identified with the processes for assessing the competitive impact of changes to the BBC's UK Public Services? If you consider there should be changes to these processes, please set out what these are and, if possible, provide any relevant evidence.**

**Question 6: Do you have any concerns about the regulatory framework for the BBC's commercial activities that are not being considered in the review of BBC Studios?**