

Your response

Question	Your response
<p>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.</p>	<p>Confidential? – N Yes.</p>
<p>Question 2: Do you agree with the proposed approach to reviewing the BBC Operating Licence? If not, please explain why.</p>	<p>Confidential? – N Yes. We agree that Ofcom should be able to hold the BBC to account for its BBC's online services, such as BBC iPlayer and BBC Sounds. We do have some concerns however at the suggestion of the BBC being given greater scope to determine how best to fulfil its Licence obligations across its platforms and services. Only around 40 per cent of TV sets are broadband compatible and the cost of broadband is prohibitive for a significant number of households. Research by the Cambridge Centre for Housing and Planning Research at the University of Cambridge suggests that only 51% of households with income between £6000-10,000 have home internet access compared with 99% of households with an income of over £40,001. Until home internet access is more universal, the BBC's licence obligations must still be fulfilled on its linear platforms and supplemented by its online presence. It would be wholly inappropriate for those experiencing social disadvantage to pay the same licence fee and yet receive a diminished service as a result of being unable to afford the secondary costs of home broadband and suitable equipment. Ofcom</p>

	<p>must continue to regulate to ensure that all licence fee payers are receiving an equitable service.</p> <p>Currently, the BBC pays creators and rights-holders less for online-only or online-first content (this is true across both TV and Radio). We are concerned that the BBC will use any loosening of the regulatory regime to shift to a predominantly online-first commissioning model which will detrimentally affect the earnings of writers.</p>
<p>Question 3: Do you have any views on how to measure the BBC's performance?</p>	<p>Confidential? – N</p> <p>We believe that the BBC must be more transparent in both its annual plans and its annual reports. However, we have some concerns about Ofcom's suggested way forward.</p> <p>Since 2017 and the removal of some specific duties on the BBC to broadcast a minimum of hours of original drama and comedy, we have seen dramatic cuts in the amount of work commissioned – especially in radio.</p> <p>We are concerned that Ofcom is considering further reducing its quantitative targets for the BBC in favour of more qualitative goals as we believe that this will pave the way for further cuts in original scripted drama and comedy. Qualitative measures facilitate more 'double counting', allowing the BBC to use individual shows to 'hit' a number of targets, disguising the fact that overall commissioning rates are being reduced.</p> <p>We believe that annual plans should detail:</p> <ul style="list-style-type: none"> • Number of hours of audio drama planned across the BBC • Number of hours of original scripted comedy planned across the BBC • Number of hours of original (first run) audio drama planned for radio (broadcast-first) • Number of hours of original (first run) audio drama planned for podcast/Sounds-first • Number of hours of original (first run) original scripted audio comedy planned for radio (broadcast-first)

	<ul style="list-style-type: none"> • Number of hours of original (first run) original scripted audio comedy planned for podcast/Sounds-first • Number of hours of original (first run) scripted comedy planned for TV (broadcast-first) • Number of hours of original (first run) original scripted comedy planned for iPlayer-first • Number of hours of original (first run) drama planned for TV (broadcast-first) • Number of hours of original (first run) drama planned for iPlayer-first • Number of hours of original (first run) children’s drama planned for TV (broadcast-first) • Number of hours of original (first run) children’s drama planned for iPlayer-first • Number of hours of original (first run) children’s scripted comedy planned for TV (broadcast-first) • Number of hours of original (first run) children’s scripted comedy planned for iPlayer-first <p>Annual reports should then detail performance against these figures.</p> <p>We also believe that the BBC should be more transparent and held to account for the diversity of writers that it commissions. Annual plans should detail commissioning targets in terms of the diversity of writers being commissioned and produced and annual reports should detail progress against those targets.</p>
<p>Question 4: Do you agree with our proposed scope of the review in relation to content standards? If not, please explain why.</p>	<p>Confidential? – N</p> <p>Due to the sustained political attacks on the BBC, we believe that it is probably helpful for Ofcom to include this in the review. However, in light of Ofcom’s own findings that the BBC First approach usually works well, we would not expect to see dramatic change required.</p>
<p>Question 5: Do you agree with the issues we have identified with the processes for assessing the competitive impact of changes</p>	<p>Confidential? – N</p> <p>We agree that increased and improved stakeholder involvement is necessary when</p>

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.	considering the impact of changes to the BBC's UK Public Services.
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?	Confidential? – N No. We agree that it will be helpful to consider within the Periodic Review the role of the public service in the operation of the commercial activities.