

Question 1: Do you have any comments on our proposals?

I have observations about the section 'The risk that additional news content causes audiences to switch from commercial news providers'; specifically Section 5.18-5.21.

I am concerned that the issue of BBC Scotland's growing use of its broadcast journalists to produce more stories and long-form written pieces for its website is being underplayed.

For example, BBC Scotland already employs a Chief Sports Writer (Tom English). Several other broadcast specialists, including Political Editor Brian Taylor and Business and Economy Editor Douglas Fraser, regularly contribute lengthy analysis and feature-style pieces for the BBC Scotland news website.

Further recruitment of broadcast specialists in health, home affairs and education is likely to see this pattern expand.

As John McLellan, chairman of the Scottish Newspaper Society, has said: 'By its own admission, the BBC will use the new staff to provide written material for its website which is in direct competition with long-established commercial news providers and Ofcom will be rubber-stamping the BBC's continued incursion into non-broadcast areas'.

While I accept that Ofcom recognises the potential dangers in such an expansion (section 5.21) I still maintain that asking the BBC Board to monitor such expansion under the terms of the regulatory framework provides little comfort to commercial publishers.

Specifically, how will the Board be in a position to judge whether the journalists recruited for the new channel are providing material for BBC Scotland's website? Will they monitor changes in the volume of material published? Will they consider the important distinction between news stories and long-form features and analysis?

In short, I don't believe the safeguards limiting BBC Scotland's non-broadcast threat to



commercial publishers' interests are adequate.