

Consultation response form

Please complete this form in full and return via email to BBCScotland.Assessment@ofcom.org.uk or by post to Glenn Preston, Ofcom, 4th Floor, 125 Princes Street, Edinburgh, EH2 4AD

Consultation title	Invitation to comment: Ofcom review of proposed BBC Scotland television channel
Full name	Dr David Rushton
Contact phone number	██████████
Representing (delete as appropriate)	Self / Organisation - please provide the organisation's name below
Organisation name	Institute of Local Television Ltd
Email address	██████████
We will keep your contact number and email address confidential. Are there any additional details you want to keep confidential? (delete as appropriate)	Nothing/ Your name / Organisation name / Whole response / Part of the response (you will need to indicate which responses are confidential)
For confidential responses, can Ofcom publish a reference to the contents of your response?	Yes/—

Your response

Question 1: Do you consider that the BBC's published proposals are clear in relation to their scale (both in terms of financial resource and in terms of reach and type of content) and the timescales for implementation? If not, please provide details of the areas where you feel more clarity is required.	Confidential? N Yes
Question 2: Did the BBC's consultation process provide a suitable opportunity for you to set out your views fully? If not, please provide details.	Confidential? N Yes

<p>Question 3: Because the BBC's proposal involves the introduction of a new public service channel, we do not consider that further analysis is required to determine materiality. If you disagree, please explain why you consider the BBC's published proposals are <u>not</u> material.</p>	<p>Confidential? N</p> <p>-</p>
<p>Question 4: Please explain whether you consider Ofcom should undertake a BCA or a Shorter Assessment of the BBC's proposal.</p>	<p>Confidential? N</p> <p>Not necessary</p>
<p>Question 5: Do you agree with the BBC's assessment in its public interest test about the potential public value and/or market impact of the proposal? Please provide any additional information you may have to explain your view.</p>	<p>Confidential? N</p>

Question 6: Does this proposal highlight any significant market impact concerns which might affect your products and services? Please provide any additional information you may have to explain how you consider the launch of a new BBC channel for Scotland could affect you if it goes ahead.

Confidential? N

The Institute of Local Television has lobbied for thirty years on behalf of decentralised and localised forms of TV. We would hope for a more positive commissioning of programme making from this new Scottish channel representing greater local, community of interest and rural emphases. This is not a plea for parochial filmmaking but for ideas and values from across Scotland to be represented on local terms. A national Scottish service would be less uniform if it sources many locals/ communities of interest each with their own budgets (as BBC promoted broadband delivered services) to maintain content and a local skills base.

The variations of Lowland Scots should be evident in programming. The new channel should dignify the way we are and the way we speak. The centre to periphery model of broadcasting should embrace the pull of content both from communities of interest and among locally understood identities. A contrasting and contradictory 'how we are' better reflects Scotland than a centrally conceived homogeneity.

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