



BBC's proposals for a new channel in Scotland

Consultation Response

14 December 2017

"The impact of the new channel must be to build audiences in Scotland, both in terms of the overall number of viewers and the length of time spent viewing. It should seek to have a positive impact on BBC ALBA, helping to build the BBC ALBA audience and not take away from it." MG ALBA submission to the BBC, July 2017

We are pleased to respond to Ofcom's questions in relation to the BBC's proposals.

Ofcom's Questions

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

No view.

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

Yes

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 **not** material.*

No view.

Question 4

Please explain whether you consider Ofcom should undertake a BCA or a Shorter Assessment of the BBC's proposal.

No view.

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.

We propose that further work be undertaken on the new channel's potential impact on BBC ALBA.

BBC ALBA Viewership

The proposals do not consider the new channel's potential impact on BBC ALBA viewership in the context of the Public Interest Test, other than its effect on competition.

We believe that the Public Interest Test should examine more closely all potential impacts of the new channel on BBC ALBA. This is important point for two reasons:

- there will be no net benefit to the BBC, and no new public value, should viewers transfer their viewing time from one BBC channel (BBC ALBA) to another (BBC Scotland);
- reduction in the viewership of BBC ALBA may risk reducing the public value of BBC ALBA in terms of (a) the value for money of non-BBC investment in the channel (MG ALBA provides 60% of the economic value of BBC ALBA) and (b) the fulfillment of wider public policy aims for Gaelic, such as raising awareness of Gaelic and assisting with its revitalisation.

The research conducted by Kantar suggests that BBC ALBA viewers are more favourable to the new channel than other BBC viewers, that BBC ALBA viewers will be more inclined to watch the new channel than other BBC viewers, and that some BBC ALBA viewers may watch less of BBC ALBA .

We believe the issues at stake require more detailed analysis than than provided by the Kantar research. The specific question is whether and, if so, to what extent the new BBC Scotland might cause audience to migrate to it from BBC ALBA and, therefore, to what extent the public value of BBC ALBA might be diminished.

Economic impact on BBC ALBA

The new investment in content (BBC Scotland £20m, BBC network £20m and Screen Unit £10m) is excellent news. BBC ALBA works on budgets that are considerably less than those proposed for the new channel and we suggest that further work be undertaken to examine whether there may be unintended impacts for BBC ALBA, such as cost inflation if competition for resources, skills and talents increases dramatically.

BBC Policy

As proposed in our submission to the BBC in July 2017, we advocate an operating principle: parity of status between the new channel and BBC ALBA to ensure that all decisions relating to BBC Scotland are also considered in light of their potential impact on BBC ALBA, with the intention that all decisions should be beneficial or neutral – a “do no harm” principle.

We also continue to ask that the BBC should set out its principles in relation to minority language broadcasting so that BBC ALBA's status is clear and to ensure greater parity between the BBC's minority language services.

Appendix: About MG ALBA and BBC ALBA

1. Introduction.

MG ALBA is short for Meadhanan Gàidhlig Alba (Gaelic Media Scotland) and is the operating name of Seirbheis nam Meadhanan Gàidhlig or the Gaelic Media Service.

MG ALBA's statutory purpose is set out in section 208, Communications Act 2003:

“to secure that a wide and diverse range of high quality programmes in Gaelic are broadcast or otherwise transmitted so as to be available to persons in Scotland”

“...and a reference to being available to persons in Scotland includes a reference to being available both to persons in Scotland and to others”

Governance oversight of MG ALBA is exercised by Ofcom, who appoint members of the board of MG ALBA subject to the approval of Scottish Ministers.

MG ALBA is funded by the Scottish Government.

2. BBC ALBA

MG ALBA funds and operates BBC ALBA (the Gaelic language television channel) in partnership with the BBC. BBC ALBA is the first partnership television service to operate under a BBC licence.

BBC ALBA fulfils the UK's obligations for Gaelic television under Article 11 of the European Charter for Regional or Minority Languages¹ and is an important part of the Scottish broadcast ecology, commissioning a large proportion of all independently produced TV content in Scotland.

BBC ALBA's content budgets for 2017-18 are £11.5m from MG ALBA and 6.7m from the BBC, and are expected to be similar in 2018-19

¹ <https://rm.coe.int/1680695175>