

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	David Strachan
Contact phone number	
Representing (delete as appropriate)	Organisation -
Organisation name	Tern Television Productions 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
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.	Yes they are clear Confidential? – N
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 a very thorough process of consultation Confidential? – N
Question 3: Because the BBC's proposal involves the introduction of a new public service channel, we do not consider that	Agree Confidential? – N

<p>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>Question 4: Please explain whether you consider Ofcom should undertake a BCA or a Shorter Assessment of the BBC's proposal.</p>	<p>For Ofcom to decide Confidential? – N</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>1. The BBC has demonstrated audience appetite. Audience surveys conducted by the BBC demonstrate dissatisfaction with the current level of representation of Scotland on screen which the channel will seek to remedy. 2. The proposal goes some way to remedying the historic chronic imbalance of BBC investment in production across the UK. The proposal quotes £233m as current spend in Scotland - significantly less than is raised in Scotland from licence fee payments. The latest BBC annual report shows that Scotland is unique in the UK's nations in having a net deficit of licence fee spent compared with licence fee raised.</p> <p>The correlation between the two is clear. Even with the spend on the new channel and the proposed increase in network spend a significant imbalance will remain.</p> <p>Confidential? – N</p>
<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.</p>	<p>Previous BBC initiatives to raise the level of spend and production in Scotland have been dominated by Lift and Shift, ie productions initiated in London forced to produce in Scotland, at worst pop-up bases, at best branch offices with various degrees of permanence. There has been a reluctance by network to engage strategically with companies established and based in Scotland. The Ekos report in 2016 showed a drift towards commissioning London companies' popups or branch offices which was paralleled by a decrease in the size of the sector. The reason</p>



is clear. Companies fully based in Scotland contribute to industry growth by winning work from cable, satellite and international as well as from the PSB quota which was intended to stimulate growth. Branch offices merely absorb quota, leaving other work to their London HQs.

This observation mainly applies to the reference made in the BBC's proposal to £20m increased network spend. But it also has an impact on co-commissioning with network, which is clearly going to be part of the new channel strategy.

Confidential? /N

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