

## Your response

Question	Your response
<p data-bbox="188 369 336 398"><b>Question 1:</b></p> <p data-bbox="188 443 756 647"><b>Respondents are invited to comment on whether they agree with Ofcom’s preliminary view and are asked to frame their views and responses with reference to, or in the context of, the statutory criteria in section 19(3B) of the Broadcast Act 1996</b></p>	<p data-bbox="794 336 1362 432">I agree with the view that the change would be a departure from the licensed character of service.</p> <p data-bbox="794 477 1362 719">I disagree that these changes should be approved. This is because the changes outlined in all of the licensee’s requests would have a significant detrimental impact on the quality of local television, as the licensee is seeking to reduce the amount of local/first-broadcast content they are required to produce.</p> <p data-bbox="794 763 1362 1328">Furthermore, I believe “That’s TV” are effectively abusing their local television service licences, and that Ofcom should consider taking statutory action. The current character of service does not appear to restrict the licensee from creating a ‘spine’ to manage broadcast content, as this is technologically feasible given the existing character of service. Indeed, I believe the variation request is purposed to further remove the ‘local’ from local TV. The company has been investigated many times by various parties and news outlets, and their track record is abysmal (e.g. mistreatment of staff, and allegations that That’s TV does not broadcast content from a studio within the local area, in breach of its licensing obligations).</p> <p data-bbox="794 1373 1362 1469">I also believe Ofcom should fully investigate whether or not the licensee is ‘fit and proper’ to hold broadcasting licences.</p>