

Your response

Question	Your response
<p>Question 1: Do you agree with Ofcom's provisional assessment and its proposed changes to the Operating Licence for Children's news on CBBC? If not, please explain why, providing appropriate supporting evidence where possible.</p>	<p>No, I do not agree.</p> <p>Essentially we don't feel that the BBC should be able to spend licence money on an enhanced Newsround digital platform that would detrimentally impact existing commercial businesses like First News. It would constitute unfair competition.</p> <p>Currently, the BBC is stating its plan to upload up to 20 Newsround news stories online each day, which will be free to access at any time by children at home, or during their school day. The provision of news and educational resources to schools has been the core purpose of First News for nearly 14 years, with some 10,000 schools paying for the weekly delivery of First News, and our accompanying educational resources, to bring the real world into the classroom. We also have an online offering, including a daily video news bulletin but, on limited resources, we could not compete on a level playing field with BBC Newsround if licence fee money were used to enhance the programme's digital offering. Why would schools and families continue to pay us for our news content for children, if the BBC increased its free content?</p> <p>More broadly, we object to the proposal because some groups of children may lose out with content moving from broadcast to online, because not all children have digital access at home, particularly in poorer households, arguably the most important children to reach. The low viewing figures for Newsround on the CBBC channel (reaching just one in six of its target audience) raises questions about the relevance of CBBC's content itself, not where it is aired. If children were drawn to Newsround, they would watch it on the CBBC channel, or on iPlayer. Moving it online is not a solution. The chances of large numbers of children actively seeking out Newsround online is minimal and, therefore, not a good use of licence fee money. Children, literally left to their own devices,</p>

	<p>watch You Tube, Netflix and iPlayer and do not use single destination websites in large numbers. The only way to achieve higher viewing figures of a Newsround online platform would be if the new content was embraced by schools, and children were sat down to engage with it during the school day in lessons. But, if free content (funded by the licence fee) is marketed in any way to schools, that would materially impact on First News. The core of our business is that schools pay for our content – including copies of the newspaper, accompanying digital classroom resources and the online offering we work hard to produce with limited resources.</p>
<p>Question 2: Do you agree with Ofcom’s provisional assessment and our proposed changes to the definition of a first-run UK origination in respect of children’s content and additional condition to safeguard the provision of some first-run UK originated children’s content on the linear services? If not, please explain why, providing appropriate supporting evidence where possible.</p>	<p>No. If Newsround were to increase free news content online, paid for by the Licence Fee, that would constitute unfair competition to those of us who have to charge a fee for our content. Furthermore, Ofcom’s proposed condition “to require the BBC to enhance children’s news online through content which is delivered in a range of different formats, covers a broad range of topics and features in-depth news and analysis” is especially concerning. This is exactly what First News does. If this level of content were to be provided for free it would fundamentally affect our business because families and schools currently pay First News for this type of content. We would feel more comfortable if the free Newsround offering was very limited.</p> <p>We would ask for reassurance that there is no plan now, or in the future, for the BBC and/or Newsround to offer associated educational materials to schools. This would materially affect our business and constitute unfair competition if financed via the Licence Fee.</p>

Question 3: Do you agree with Ofcom's provisional assessment and our proposed changes to the definition of a first-run UK origination in respect of children's content and additional condition to safeguard the provision of some first-run UK originated children's content on the linear services? If not, please explain why, providing appropriate supporting evidence where possible.	See above.
Question 4: Do you agree with Ofcom's provisional assessment on the cumulative impact of the variations as a whole? If not, please explain why, providing appropriate supporting evidence where possible.	See above.
Question 5: Do you agree with our proposal for the transitional arrangements? If not, please explain why, providing appropriate supporting evidence where possible.	See above.