

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>Confidential? – ¥ / N</p> <p>No, I fear this will be a means to an end, as BBC News and Children's have been held aloft as pillars of what the BBC do so well, this being a mixture of the two should be preserved as much as possible. As I understand the viewing habits of children have radically changed and continue to evolve, more and more BBC Children's have used this trend as an excuse to do less public service, scrimp on quality and waste time, effort and money on strategies that take them further away from what the existence of the BBC and BBC Children's stand for.</p> <p>I happen to know that a lot of the statistics used to demonstrate Newsround's popularity online, are skewed to present an inaccurate picture. A lot of the news stories are used as click bait, so the number of people staying on the site are not as large as first shown. There is also a question of who are clicking through, the numbers do not take in to consideration the demographic of the user, so more older people who are not the target audience click through so putting more content online will not find more of the audience they have lost.</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>Confidential? – ¥ / N</p> <p>Linear TV needs to be protected, I understand that teens regularly watch more content online but the younger the audience the more likely they are to still use linear TV for content, especially for the BBC. As this Kidscreen article demonstrates, linear TV is still vitally important for pre-schoolers and to set a precedence that online should be prioritised is a dangerous, slippery slope, especially if it is to be only thought of as a platform and linear altogether ignored! There's also a case for more VoD services perpetuating linear services, as this Broadcast article suggests SVoDs are trialling linear broadcasts.</p>
<p>Question 3: Do you agree with Ofcom's provisional assessment and our proposed</p>	<p>Confidential? – ¥ / N</p>

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.


Is this not the same question as above? I presume this is about quota, the BBC should not be reducing or redefining 'first-run UK originated children's content', they should simply be making quality public service content and making it available on linear and online. To do so makes a mockery of the £34m investment that BBC Children's was supposed to invest in digital content, even with that investment they are still asking for these changes! That investment has been miss-managed and wasted, if they had used it to simply create great public service content for linear and online, they would have attracted more of an audience, who simply want quality, relevant content that they can enjoy, relate to and informs them of themselves and the world around them. Instead we got the new platforms which tried to replicate already existing platforms that are already popular with young people, *Buzz (Snapchat/Instagram)*, which is now defunct and the game *Nightfall*, which has failed to attract any sort of decent audience. They're doing the same with *iPlayer* where they're trying to take on the likes of *Netflix* and *YouTube*. The BBC needs to stop trying to compete with successful companies, platforms and commercial businesses who have extraordinary amounts of money and global commercial reach, that is not the role of the BBC and it will lose those fights. Instead they should stick to their unique selling position, which is public service, make great, quality content that people want to watch, make it available as many places as you can on their own platforms and the audience will find it.

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.

Confidential? – Y / N
There are subtleties to each different proposal and they all need clear, careful, individual consideration and the impacts will be huge if not safeguarded properly. It could be the difference between the BBC becoming as relevant as it has ever been, or being significantly reduced to simply a platform for external content (potentially with a loss of public service), or not existing altogether.

5: Do you agree with our proposal for the transitional arrangements? If not, please explain why, providing appropriate supporting evidence where possible.

Confidential? – Y/ N
This needs a fuller inquiry from the industry as a whole and rushing in to this decision could damage the industry to point of no return it not



carefully considered. 2020 is too soon and feels like a knee jerk reaction as their 2020 strategy has clearly failed.