

## Your response

Question	Your response
<p><b>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.</b></p>	<p>Confidential? –N</p> <p>As a general point: Ofcom July 2018 1.13 As a publicly-funded broadcaster that occupies a unique position in the UK media landscape, we expect the BBC to lead the way in this regard (<i>high quality, original programmes</i>) – and we increased requirements accordingly around programmes for children when we set the BBC Operating Licence in 2017.12</p> <p>50 fewer hours of any sort of content would feel contrary to this guidance, but at this time, reducing the news offer seems particularly regressive, especially given other children's services are looking to start or extend their news offer for young people.</p> <p>BBC Children's is by far the best resourced of all at £90M a year. It is best placed to provide a wide range of content for children. As the BBC is licence fee, rather than advertiser, funded, it should be absolutely the lead provider of impartial, unbiased news for this very important audience.</p> <p><b>Reducing news hours and hours generally</b> The news bulletins are important. They put the 'current' in current affairs, and should be kept front and centre on the linear service as well as available on line – to catch up on iPlayer (both an important resource to schools as well as at home audience). Children are less likely to actively seek out news, and if they do stumble across an article on the website, it might be days out of date, and that scenario rather undermines the purpose of 'news' which is why the linear offer, even if a passive experience, is so crucial.</p> <p>The argument for online is hazy in this request. Much, much more detail is needed on what online offer would look like. The provision on</p>

	<p>the website currently doesn't look like an adequate substitute to regular bulletins from trusted journalists. It looks like something that is much more cost efficient to provide, which is likely what underpins this request, and if one was to take a bleak point of view, represents the forerunner to put all of the children's linear offer online – in the manner of BBC3 – a move which saved the BBC £55M a year.</p> <p>The phrase 'it makes sense for the BBC to provide more children's content online' should be qualified. What do they mean by 'content' and 'online'. Children enjoy the flexibility of VOD, and that is likely what is meant by 'online' in most circumstances, likewise 'content' is programmes. The same offer as linear, but on a catch up service is what is meant, not a couple of articles on a website. This is very often a useful conflation that we should all be mindful of.</p> <p>The BBC Children's budget is proportionately small considering the potential size of audience, and if the intention to make substantial cuts to this department at a time when BBC claim to be trying to attract young audiences seems contrary at best.</p> <p>The BBC should be looking to increase their Children's spend, and spending it on Content ie television programmes.</p> <p>News and extending knowledge and understanding of the world is a key objective for any PSB.</p> <p>The argument that audiences have migrated online is unsubstantiated in the request, but should data be offered, it might not be unrelated to positioning of Newsround pieces on the BBC home page, and therefore worth identifying how many 'extra' consumers are actually children.</p>
<p><b>Question 2: Do you agree with Ofcom's provisional assessment and our proposed</b></p>	<p>Confidential? – N No.</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.

The main arguments for this are:

1. discovery, kids are more likely to find it online (iPlayer) – the reality is they find good content anywhere if it is good.
2. Not enough space on the channels to play content. Revert to broad scheduling rather than fewer, bigger, better where what are termed Priority get as many as 6 outings in a single day. Public service should have a broad range of programmes covering different genres and techniques. The current schedules have a whiff of purely commercial broadcasters such as Disney or Nickelodeon, which is barking very much up the wrong tree for a Public Service Broadcaster.
3. Teen content – inappropriate for the channels. Fair enough, but I understand there are to be no more teen content commissions so this argument would be redundant.

Giving this flexibility would mean there is a temptation to prioritise online platforms with new/popular content in order to further diminish the linear channel appeal.

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.

Confidential? N

Maybe, as above, there are reasons for not doing this, but maybe the BBC should clarify under which circumstances something would be iPlayer only (see teen content above), and what proportion of originations would be iPlayer only (see concern about linear channel neglect), and what sort of programme would be iPlayer only or launched on iPlayer – will it be premium. This can't be considered in the light of hours only.

	<p>The suggestion of a 50% guarantee is not enough to ensure that the linear offer is maintained as an attractive proposition.</p>
<p><b>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.</b></p>	<p>Confidential? – Y [X]</p>
<p><b>5: Do you agree with our proposal for the transitional arrangements? If not, please explain why, providing appropriate supporting evidence where possible.</b></p>	<p>Confidential? – Y [X]</p>