

## Consultation response form

Please complete this form in full and return to [bbcthree.assessment@ofcom.org.uk](mailto:bbcthree.assessment@ofcom.org.uk).

<b>Consultation title</b>	BBC Three Television Channel: Preliminary Determination
<b>Full name</b>	Lesley Gannon
<b>Contact phone number</b>	✂
<b>Representing (delete as appropriate)</b>	Organisation
<b>Organisation name</b>	Writers' Guild of Great Britain
<b>Email address</b>	✂

## Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

<b>Your details: We will keep your contact number and email address confidential. Is there anything else you want to keep confidential? Delete as appropriate.</b>	Nothing
<b>Your response: Please indicate how much of your response you want to keep confidential. Delete as appropriate.</b>	None
<b>For confidential responses, can Ofcom publish a reference to the contents of your response?</b>	Yes

## Your response

<b>Question</b>	<b>Your response</b>
<b>Question 1: Do you agree with the findings from our review of the BBC's assessment of the public value of the Proposals? Please provide evidence to support your views.</b>	Confidential? – N Yes. We agree that the proposed linear channel has the potential to contribute significant public value.

	<p>In particular we welcome the expansion of linear provision to audiences outside of London and the south-east, from lower socio-economic groups, and those with less access to on demand services.</p> <p>We also welcome the proposal to ensure that the majority of spending will be outside of the M25 zone and would strongly recommend that the increased regional spending is accompanied by increased regional commissioning and decision making.</p>
<p><b>Question 2: Do you agree with our assessment of the likely impact of the proposals on fair and effective competition (including as set out in Annex 1)? Please provide evidence to support your views.</b></p>	<p>Confidential? – N</p> <p>Yes. We agree that the proposed changes are unlikely to have a significant adverse impact on fair competition</p>
<p><b>Question 3: Do you agree with our provisional conclusion that the public value associated with the BBC’s proposals justifies the adverse impact on fair and effective competition that we have identified? Please provide evidence to support your views.</b></p>	<p>Confidential? – N</p> <p>Yes. That a key target audience is younger adults from lower socio-economic groups with less access to on-demand services, we agree that there will be very little impact on SVOD providers.</p> <p>We agree that the additional public value created by the proposals justifies any minor adverse impact on other competitor channels.</p>
<p><b>Question 4: Do you agree with our proposals on the Operating Licence conditions that should apply to BBC Three? Please provide evidence to support your views.</b></p>	<p>Confidential? – N</p> <p>In part.</p> <p>We agree with the stipulation that there must be a daily news broadcast on Mon – Fri.</p> <p>We welcome the proposal for an increased requirement for original productions.</p> <p>We understand the arguments for not specifying a peak viewing window for the channel – but also agree that this must be monitored closely to ensure that some forms of content or some content producers are not consistently pushed to the margins.</p> <p>We welcome the suggestion of a requirement for the channel to provide a range of newly commissioned UK content across a mix of different genres.</p> <p>However, we are very concerned that these requirements would potentially allow the channel to meet their requirements without commissioning any UK scripted drama.</p> <p>We are disappointed that Ofcom has decided not to set at least a minimum requirement for</p>

	<p>original scripted drama or comedy for the channel.</p> <p>As we have set out in the recent consultation on the regulation of the BBC, WGGB is concerned that a lack of quantitative targets for scripted content (particularly for drama and comedy – including children’s) often results in a reduction in these areas in exchange for other genres that are less expensive to make.</p> <p>The key role of the BBC in the UK commissioning landscape makes this particularly important.</p> <p>We have also expressed our agreement with Ofcom that BBC Annual Plans and reports often lack detail in relation to the amount of content produced.</p> <p>We would ask that Annual Plans and Annual Reports provide specific information on the amount of scripted UK drama and comedy content that is planned for commissioning and production by the channel.</p> <p>We would also ask that Annual Plans and Reports detail commissioning by platform – that is, what has been commissioned for linear and what has been commissioned for online.</p> <p>This is significant to the writing community as it has a material bearing on commissioning rates and writers’ incomes.</p>
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