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**The Liberal Democrats response to: A review of the Ofcom Rules on Party Political and Referendum Broadcasts and Proposed Ofcom Guidance for broadcast coverage of elections.**

Mr Baxter,

We support the broad aims of this consultation and the suggestions put forward. There are a few points we wish to comment on, and this is set out in the points below.

If not specified in this submission, we support the recommendation.

Question 1.

We recognise there is a need to allow minor parties the ability to gain ‘major party’ status. However, we do not feel that changing the way ‘major parties’ are listed in the code makes that aim any more likely.

We agree with consultation in 3.12 in saying that the current list is simple and straightforward. It has worked well and has proved effective in reflecting the political system. In our opinion it may be worth exploring the possibility of retaining the major parties listed in the code, plus a ‘top-up list’ that could be included in an additional annex.

As in 3.16 we fully support the recommendation that any changes to the list of major parties would be subject to a formal review. It is important that the format this review takes is set out prior to any changes to the code.

We also strongly support the addition of the Alliance Party to any list of major parties.

Question 2.

It is clear that in some elections, Independent candidates can garner a strong level of support, and it is only right that they have the opportunity to air a PEB.

However we specifically endorse the consultation guidance that it is unfeasible to offer each candidate a PEB, and that it is only practicable where a single electoral area matches a Licensee’s broadcast footprint.

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Question 5.

We would support option B.

In addition, we believe that Local Television offers a further challenge about broadcast footprint that has not yet been addressed. If the new code makes specific demands of Local Television, it may require some form official definition of electoral areas. Inevitably, political boundaries, be they European, Parliamentary or Local, will be different to the Licensee's broadcast footprint. The fact that there will be some cross over, in either direction, has not been addressed.

Question 7.

Liberal Democrats have used the 2'40" time limit for the majority of broadcasts, but have also used 3'40". The Party would like to maintain that option. That said, the specific time limit seems arbitrary and we would support greater flexibility.

While we have never produced a PPB or PEB that runs to 4'40, we would support option D2. If Licensee's required a more rigid framework, we would also support setting out a greater variety of possible times, such as 'any length from 2' to 4'40 in 15 second increments". This may give the Licensee greater control, rather than someone producing a PPB running to 2'04".

We would suggest option E2 in relation to radio.

Question 8.

As set out in the consultation we support the present scheduling requirements.

Question 9.

It is sensible to de-couple the PPBs from significant events in the Parliamentary calendar, and broadcast them on a seasonal basis.

While the dates suggested are sensible, there is a danger of 'bunching' between April and May when you also consider PEBs. With the local elections inevitably happening in early May all political parties would be keen to maximise their airtime, and would always fight for broadcasts before Election Day.

Question 11.

While understandably not covered by the code, we do agree with the submission in 3.111, that Licensees and political parties should discuss the issue of labelling of the broadcasts. It is a duty of both the party and the Licensee to ensure people feel the broadcasts are accessible, engaging and encourage people to get involved in the democratic process. And part of that does include looking at the way they are labelled.

Regards

**Liberal Democrats**