

Title:

Forename:

Surname:

Representing:

Organisation

Organisation (if applicable):

Plaid Cymru

Email:

What additional details do you want to keep confidential?:

Keep name confidential

If you want part of your response kept confidential, which parts?:

Keep name confidential

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Do you agree with amending Rule 11 of the PPRB Rules and Section Six of the Code by inserting the proposed wording set out in paragraph 3.19 above? If you do not agree with this approach, please explain why and, if appropriate, suggest alternative wording.:

We agree with this amendment.

Question 2: Do you agree with amending Rules 10 of the PPRB Rules by inserting the proposed wording set out in paragraph 3.31 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

We do not agree with this amendment. We cannot imagine a situation in Wales where the criteria would be met i.e. particularly with regards to where the Licencee's broadcast footprint would be sufficiently coterminous with the electoral area; or that an independent candidate could demonstrate a significant level of previous and/or current support. We would suggest that if provision needs to be made in London for the Mayoral elections then that should be treated separately.

Question 3: Do you agree with amending Rule 9 of the PPRB Rules by inserting the proposed wording set out in paragraph 3.40 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

Yes, we agree with this amendment.

Question 4: Do you agree with amending Rules 7 to 9 of the PPRB Rules by inserting the proposed wording, including new Rule 9A, set out in paragraph 3.51 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

Yes, we agree with this amendment.

Question 5: Do you agree with either Option (A) or Option (B) in relation to inserting new Rules 17A and 17B, as set out in paragraph 3.68 above? If you do not agree with either of the proposed options, please explain why and, if appropriate, suggest alternative wording.:

We agree with Option B.

Question 6 : a) Do you agree with the 'one sixth' threshold set out in Rule 13 of the PPRB Rules? If you do not agree with the threshold, please explain why, and, if appropriate, suggest an alternative.:

No, we do not agree with the one sixth threshold, because of the reasons and experiences outlined by the broadcasters in paragraph 3.71. We believe that the threshold should be amended to 25% of seats or higher.

Question 6 : b) Do you agree with amending Rules 12 14 and 17 of the PPRB Rules by inserting the proposed wording, including new Rule 13A, set out in paragraph 3.83 above? If you do not agree with this approach, please explain why, and, if appropriate, suggest alternative wording.:

We do not agree with amending the rules and we believe the proposed change would create ambiguity. We refer you also to our response to question 2.

Question 7: Do you agree with: a) Any of the Options (C1), (C2), (D1) or (D2) in relation to amending Rule 20 of the PPRB Rules in relation to television, by inserting the proposed wording as set out in paragraph 3.93 above? :

Our preference is Option D2 with Option D1 as a second preference as we believe there should be greater flexibility with regards to the duration of the broadcasts.

Question 7: Do you agree with: b) Either Option (E1) or Option (E2) in relation to amending Rule 20 of the PPRB Rules in relation to radio, by inserting the proposed wording as set out in paragraph 3.93 above. If you do not agree with any of the proposed options, please explain why, and, if appropriate, suggest alternative wording:

We agree with E2, as the duration should be brought in line with the durations for television.

Question 8: Do you agree with the scheduling requirements set out in Rules 21 and 22 of the PPRB Rules? Please give reasons for your response.:

We agree with the current scheduling requirements and they should not be changed in our view. We believe that PEBs, PPBs and RCBs should be shown at a time when they reach a maximum potential audience.

Question 9: Do you agree with amending Rules 9 and 18 by inserting the proposed wording set out in paragraph 3.101 above? If you do not agree with this approach please explain why and, if appropriate, suggest alternative wording.:

We do not disagree in principle, however when the BBC proposed a change in the way PPBs were scheduled, we sought an assurance from them that they would ensure that the Plaid Cymru response to those key events would be reflected in the main news coverage. We would like similar assurances from OFCOM and would ask that this is reflected in guidance to broadcasters.

Question 10: Do you agree with amending Rules 8, 9 and 19 by inserting the proposed wording set out in paragraph 3.110 above? If you do not agree with this approach, please explain why and, if appropriate, suggest alternative wording.:

Yes, we agree that the rules should be amended however we ask that OFCOM also examines a similar issue in Wales. Although Wales is not covered in the Channel 3 licences beyond Wales, we understand that a significant number of those receiving digital television through freeview/ digital terrestrial in Wales, particularly in the Wrexham area, are receiving their Channel 3 from the English Licensees. This should be investigated as a matter of urgency and similar remedies proposed to those outlined in Question 10 should this be necessary.

Question 11: Are there any other issues arising from the PPRB Rules, not already covered, which you wish to raise?:

The description of parties within PPBs, PEBs and RCBs should match the way they are registered with the Electoral Commission in order to avoid any misunderstanding among the electorate i.e. a PPB from the Labour Party rather than New Labour, or a PPB from The Conservative Party rather than the Welsh Conservatives. We would ask that OFCOM reflects this in their rules.

Question 12: a) Are the provisions of the Proposed Code Guidance set out above appropriate?:

Not in their entirety.

Question 12: b) If you do not agree that any provisions of the Proposed Code Guidance are appropriate, please explain why and suggest alternative wording:

With regards to Guidance 4.63 under Rule 5.12 we would suggest that there is a need to explicitly say that 'significant views' could include the viewpoint of devolved legislatures as well as nation states.

Within Rule 5.13, the code should consider the issue of 'undue prominence' of parties/ politicians/issues in broadcasts transmitted to the devolved nations during UK wide elections e.g. during a European election if, theoretically, a situation arose where there was evidence in Wales that there would be very little support for UKIP but that they were providing a significant challenge in parts of England.

With regards to 4.84 (Rule 6.1), 'meaning of election period' it would provide greater clarity for all stakeholders and the electorate if the period began in Wales with the dissolution of the National Assembly for Wales, as is the case in Scotland.

We disagree with 4.88 (Rule 6.2). Plaid Cymru is recognised as one of four major party in Wales during UK General Elections. As such, broadcasters should ensure that they take this into account in relation to UK-based election programming if they are transmitting programmes to an audience which includes the Welsh electorate. It should be said explicitly in the guidance that broadcasters should ensure that Plaid Cymru is given equal prominence to other parties in programmes transmitted to Welsh audiences. The sentence which says "UK-based election programming can focus on the major parties that have a realistic prospect of forming the UK government following the election in question" should be withdrawn. It may be wiser for the inclusion of a specific paragraph here relating to the major parties in Wales, Scotland and Northern Ireland.