

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

STV

**Email:**

**What additional details do you want to keep confidential?:**

Keep name confidential

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

Name of representative as well as e-mail address.

**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.:**

(a) STV notes that Ofcom proposes to monitor the position but not to undertake formal annual reviews and it will consult with stakeholders on any proposed changes. The monitoring will need some level of flexibility.

(b) This could be potentially problematic and open to challenge unless there is a fixed, robust process which is open and transparent to address fairness.

(c) The current process works particularly well with the BLG which STV is a member and there is no reason why the current process would not continue with Broadcasters should continue to be free to liaise amongst themselves and externally to provide consistency and necessary flexibility.

**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.:**

Yes. Further clarification is welcome with regard to Independent Candidates and how this is likely to apply outwith London (e.g. Scotland, NI, Wales).

Further Clarity is required to ensure that it is not difficult for a credible independent candidate but at the same time broadcaster discretion is required where inappropriate inclusion causes harm and offence to viewers. Therefore subject to credibility.

**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

**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

**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.:**

Option A.

**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.:**

Yes

**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.:**

Yes  
(17. N/A)

**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? :**

Option C2.

**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 wordin:**

N/A

**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.:**

Yes.

In Scotland, the likelihood of smaller parties requiring PEB's is high and therefore it would be difficult to schedule more than two PEB's in a peak schedule - indeed before 10:30pm. The definition of Peak is of course subject to change (following consultation).

**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.:**

Yes.

It is noted that the Scottish Referendum in 2014 is likely to result in a Seasonal PPB being missed.

**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

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

No

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

Yes, STV generally support the revisions.

**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:**

N/A