

**Title:**

**Forename:**

**Surname:**

**Representing:**

Organisation

**Organisation (if applicable):**

Ulster Unionist Party

**Email:**

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

Keep name confidential

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

**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.:**

The only implication for Northern Ireland is the addition of the Alliance Party to the list of &quot;major parties&quot; in Northern Ireland. This merely formalises the existing arrangements whereby broadcasters already carry Alliance PEBs and PPBs from that party.

**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 are broadly content and note that the proposed changes relate mainly to independent candidates standing for election to the post of Mayor of London or Police and Crime Commissioners. Provisions for Northern Ireland remain unchanged.

**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.:**

We are broadly content with the amendment to these provisions and note that the amendment relates mainly to Mayoral Elections and the election of Police and Crime Commissioners and does not change the provisions with regard to Northern Ireland.

**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.:**

We are broadly content with these amendments regarding local digital television programme service licensees and Referendum Campaign Broadcasts.

**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 are content with either Option.

**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.:**

As the Consultation document highlights, in Northern Ireland the one sixth threshold means that a Party only has to run in three constituencies in a General Election. We consider that a figure of one third (i.e. six seats) would be more appropriate.

**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.:**

13A relates to the allocation of Party Election Broadcasts to candidates for Mayoral and Police and Crime Commissioner Elections and is therefore not particularly relevant to Northern Ireland at this time, but we are content that it is fair.

We are content with 12 and 14 but would ask that consideration be given to the situation in Northern Ireland in Rule 17.

**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? :**

We would prefer to see flexibility retained in the permitted length of PPBs, PEBs, and RCBs for both tv and radio. For TV options C1 and D1 would be acceptable.

**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:**

Option E2 would bring Radio into line with TV and therefore has merit.

**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 strongly support the retention of the current rules. It is essential that PEBs and PPBs are broadcast at peak times when the potential viewing audience is maximised.

**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.:**

This proposal recognises the current position and we are content with it.

**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.:**

These Rules deal with the situation pertaining to any Scottish Referendum and we are content with them.

**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?:**

We are broadly content

**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:**

Again, we are broadly content