

**Question 1: What are your views on the continued relevance of Ofcom's three-year strategic framework for its work in 2008/09?:**

We support Ofcom's decision to regulate for convergence, and congratulate Ofcom on making 'ensuring the delivery of public interest objectives' part of its three-year strategic framework. However, we would ask that Ofcom reconsiders how this objective will be affected by its further objectives of 'driving forward a market-based approach to spectrum' and 'promoting competition and innovation'. More detail is available in our response to question 2.

We also welcome Ofcom's recognition of the need for cross-cutting activities, but suggest some changes in our response to question 3.

**Question 2: What are your views on Ofcom's proposed policy work programme and top priority areas for 2008/09?:**

Public Voice welcomes Ofcom's priority of delivering public interest objectives as platforms and services converge by promoting access and inclusion, reviewing models for public service broadcasting and developing an approach to the evolution of radio. We also applaud Ofcom's commitment to empowering citizens and consumers through media literacy.

At the same time, we are concerned that many of the approaches to the priority areas contradict one another.

For example, the promotion of access and inclusion is almost impossible to achieve via a market-based approach to spectrum, and access and inclusion will significantly decline if there is to be increased competition in converging markets.

As such we would urge Ofcom to find a more balanced and consistent approach to meeting the interests of citizens and consumers that can be applied universally to all priority areas.

On the digital dividend review: we are disappointed that Ofcom has elected to proceed with a simple market auction process, and would urge the regulator to look at modifying the auction so that not-for-profit groups are able to compete fairly at a national, regional and local level.

**Question 3: Are there new or additional areas in which Ofcom should consider reducing regulation and work to minimise administrative burdens? Please provide specific examples.:**

No. We understand Ofcom's desire to reduce administrative burdens, but are concerned that deregulation to the extent that Ofcom proposes is a serious obstacle to the regulator fulfilling its duty to citizens. Market forces alone cannot ensure the delivery of public service objectives. As such we respectfully ask that Ofcom reconsiders its additional cross-cutting objectives as outlined in section 2.4 particularly its commitment to continue 'to reduce regulation'. Instead we would encourage Ofcom to develop cross-cutting activities that serve the needs of both

citizens and consumers (see response to question 2).

We would remind Ofcom that it has pledged to 'intervene where there is a specific statutory duty to work towards a public policy goal that markets alone cannot achieve'.

**Question 4: Are there additional areas of international policy development that Ofcom should be contributing to? Please provide specific examples.:**

We welcome Ofcom's commitment to engaging with international policy development, and have no further areas to suggest at this time.

**Additional comments:**

Public Voice has a particular interest in the way in which the Ofcom's annual plan meets the needs of citizens. We would welcome the opportunity to feed into Ofcom's consultations - not just on a consultation-by-consultation basis, but in a way that allows for joined-up-thinking and consistency of approach; particularly with respect to areas such as the PSB review, the future of channel 4 and review of children's television, where many issues overlap and influence one another.

However, we feel that in order for future dialogue between us to be effective, Ofcom must first publicly define its terms. Since the Communications Act of 2003 was passed, we have still not received any indication of what Ofcom means when it refers to 'citizens' and 'consumers'. In particular, we would ask that Ofcom reaches a definition of 'citizens' that is consistent with the definitions held by members of the voluntary and community sector, in which 50% of the UK population are involved.

Once definitions have been agreed upon we feel that we will be in a much stronger position to work with Ofcom on developing cross-cutting activities that balance the interests of citizens and consumers more effectively in UK communications regulation.