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Written evidence to the Culture, Media and Sport Committee: Inquiry into public service media content.

The International Broadcasting Trust hereby submits this evidence to the Culture Media and Sport committee for consideration during the inquiry into public service media content.

1. Summary

‘Matters of international significance or interest’ in public service media content

- 1.1 In this submission, we shall deal with a key element of public service media content, namely its coverage of ‘matters of international significance or interest’, since this is the principal focus of our activity and also our area of expertise.
- 1.2 It is IBT’s view that the definition of public service broadcasting as defined in the Communications Act 2003 stills holds good: namely that public service television should provide ‘programmes dealing with a wide range of subject matters...in a manner which...is likely to meet the needs and satisfy the interests of as many different audiences as practicable...’ and in the form of services ‘for the dissemination of information and for the provision of education and entertainment.’ (section 264)

In particular, the Act contains two public service obligations with regard to international programming:

- That there should be comprehensive coverage of news and current affairs stories from the UK ‘and around the world’;
- That there should be Tier 3 (non-news) general programmes about ‘matters of international significance’.

- 1.3 We believe that knowledge and understanding of international and global issues is an essential part of the communications needs, rights and interests of UK citizens in the global information society. Thus public service media content is viewed as a public good, like healthcare or education, and therefore an essential pillar of a modern, democratic society. It is also a prerequisite for active citizenship – something which has been at the heart of Government policy for almost a decade.
- 1.4 IBT believes the prospects for maintaining plurality in public service broadcasting in the digital age are good provided that:
- the Government and Parliament take steps to ensure that public service broadcasters fulfil their obligations;
 - the BBC Trust’s work in monitoring the BBC is carried out in a highly visible and transparent way and that there are opportunities for citizens to voice their opinions;
 - Channel 4 is supported in order to provide the BBC with the creative competition it needs to flourish and Channel 4 remains a publicly-owned corporation;
 - Commercial broadcasters are expected to continue to deliver on public service obligations, such as news provision and current affairs programming;
- 1.5 Despite the recent falls in broadcasting advertising revenue, we recommend that ITV and Five TV’s existing financial models should remain in place because currently they remain commercially viable. We would like to see them maintain a commitment to domestic and international news and current affairs and a broad range of factual programming until there is further, more substantial evidence that this commitment is undermining their commercial viability.
- 1.6 Pending the outcome of the current Channel 4 Review by Ofcom, it may be necessary to consider proposals for direct or indirect financial support of Channel 4 in order to ensure its future as a public service broadcaster. We would like to see Channel 4 being given the opportunity to make its argument for funding and for there to be the opportunity for public debate on the matter.
- 1.7 If it is found that Channel 4 requires direct financial support, IBT urges the government and Channel 4 to investigate a plural funding mix of which public funding would be a vital element without diverting revenue from the licence fee away from funding the BBC.
- 1.8 IBT is strongly opposed to any public funding being provided to commercial broadcasters or public limited companies which would benefit their shareholders rather than the general public.
- 1.9 It is IBT’s view that key areas of public service content will continue to be produced and broadcast, provided that the BBC and Channel 4 are adequately funded and they are compelled to fulfil their public service remits.

- 1.10 While IBT believes it is inevitable that there will be public service content on new media platforms, there will be no guarantee of its quality, plurality, accessibility and diversity. We would therefore like to see the provision of public funding in order to create high quality public service content which wouldn't be provided otherwise.
- 1.11 IBT welcomes Ofcom's proposal for a Public Service Publisher provided:
- It focuses on providing material for new media platforms;
 - It is managed by a new media organisation rather than a traditional broadcaster;
 - There is a public discussion and full democratic scrutiny of its priorities and role;
 - It should be driven by a vision to be genuinely international in content and in the use of interactivity - thus linking communities around the world in dialogue and exchange of ideas, providing a wide range of viewpoints, reflecting the new Global Information Society we live in, thus providing content and an approach nowhere else adequately available on UK media platforms.

2. Background: IBT

- 2.1.1 The International Broadcasting Trust (IBT) is an amalgamation of two sister organisations: the former Third World and Environment Broadcasting Project (3WE) and former International Broadcasting Trust (IBT). The new IBT is an educational charity which seeks to promote high quality television and new media coverage of matters of international significance. In the past, 3WE has been active in this area and this submission fully reflects 3WE's long history of campaigning on these issues and arguing that international coverage on television is a necessary tool in informing us all, as global citizens.
- 2.1.2 IBT represents a coalition of international charities campaigning for high quality television coverage of '**matters of international significance or interest**'. Its members include: ActionAid, Amnesty International, British Red Cross, CAFOD, Care UK, Christian Aid, Comic Relief, Concern UK, Friends of the Earth, Merlin, Oxfam, Plan UK, Practical Action, Progressio, RSPB, Save the Children, Sightsavers International, Skillshare International, Tearfund, UNA UK, UNICEF UK, VSO, the World Association for Christian Communication and World Vision. IBT is a registered charity, number 326150.
- 2.1.3 3WE has contributed to every major broadcasting policy consultation since the Government first began regulating converged communications in 1997. 3WE was instrumental in persuading the government to amend the Communications Bill so that a requirement for public service television to cover 'matters of international significance or interest' was included in the final Act [Section 264(6)(f)].

2.2 Empirical Research

- 2.2.1 The earlier work of 3WE in monitoring the quantity and range of non-news and current affairs factual programming on international issues will continue. These statistics have been published biennially since 1991. The latest report *Bringing the World to the UK* was published in June 2006.
- 2.2.2 In addition to this quantitative research, IBT has also published its own qualitative research, looking at the changing nature of television coverage of the developing world and exploring the different perspectives of broadcasters and viewers. The latest report *Reflecting the Real World* was published in May 2006. We are currently working on further qualitative research, looking at convergence and the impact of new media on traditional broadcasting, the results of which are due to be published in July 2007.

2.3 Guiding Principles on Communications

- 2.3.1 The principles below reflect the concerns of IBT's member agencies regarding adequate common understanding of the world in which we live. These concerns are shared by millions of UK supporters of our organisations.
- 2.3.2 IBT's members, being intimately and operationally concerned with the effects of 'globalisation' on communities and environments around the world, and with communicating across the world, welcome the advent of the global information society (GIS).
- 2.3.3 We believe the provision of information to society has the potential to:
- bring individuals, communities and countries together in common understanding of the processes of globalisation, the challenges of sustainable development and the necessity to care for the planet and for each other;
 - contribute to protecting human rights, peace and security;
 - enable effective global networking and interaction between concerned constituencies, including the formation of new non-geographical communities;
 - create stronger public awareness of globalisation and its impacts on all our lives, and thereby to 'make sense of the world'.
- 2.3.4 IBT believes that public policy should aim to achieve a Global Information Society which is:
- inclusive;
 - diverse and pluralistic;
 - enabling and empowering of its citizens, giving them the means to fulfil their potential as individuals in an interdependent world;
 - adequate to the great challenges of globalisation;
 - capable of supporting the universal goal of sustainable development

3. Factual Information

3.1 Term of Reference 1: The prospects for maintaining plurality in public service broadcasting in the digital age.

3.1.1 IBT believes that the prospects for maintaining plurality in public service broadcasting in the digital age are good, provided that the Government and Parliament take steps to ensure that a legal framework continues to exist to ensure that public service broadcasters fulfil their obligations.

Creative Competition

3.1.2 In the run up to BBC Charter renewal in 2006, there was consensus in both the public debate and in the evidence provided by experts to hearings held on behalf of the Department of Culture, Media and Sport that plurality and diversity in public service broadcasting and creative competition are essential for the survival of good quality public service content on BBC platforms. IBT supports this general consensus, the argument being that if the BBC were the sole public service broadcaster, it would become isolated from other channels and would find it increasingly difficult or have no need to innovate. We agree with this argument and believe that creative competition is the life-blood of public service broadcasting.

The BBC

3.1.3 In order for plurality to be maintained in public service broadcasting in the digital age, it is essential that the BBC fulfils its public service remit. The new BBC Charter will ensure that the BBC retains its focus in this area for the next 10 years and the new BBC Trust has a clear role in monitoring and maintaining the BBC's performance. It is essential that this monitoring takes place in a highly visible and transparent way, and that there are opportunities for citizens to voice their opinions.

3.1.4 The BBC has a strong track record of mixed genre channels which appeal to a wide audience, evidenced by viewing figures: in a highly competitive marketplace, in 2006 BBC 1's share dropped by only 0.6% to 22.7% and BBC 2's share by the same percentage to 8.8% as compared with losses at ITV of 9% to 19.7% and Five TV of 11% to 5.7%. Whilst BBC television has continued to maintain this sizeable audience share, in recent years, it has also increased its commitment to public service programming. According to our most recent quantitative study *Bringing the World to the UK*, published in June 2006, both BBC1 and BBC2, for example, broadcast significantly more factual international programmes in 2005 than in 2000-1 and 1998-9. Over the past two years factual programming featuring developing countries has more than doubled on the two main BBC channels and risen by 60% since 2000-01. 75% of all developing country factual output was shown by the BBC in 2005.

- 3.1.5 In terms of international programming, it is vital that the BBC's purpose of 'bringing the world to the UK' is not limited to news and current affairs or to its minority channels (BBC3, BBC4) but that this purpose applies to all channels, genres of programming and services. It is clear, for example, that entertainment or drama appeal to different audiences from those who might watch news or documentaries. A drama like *Tsunami, the Aftermath* or an episode of *Casualty* filmed in Cambodia both make just as valuable a contribution to public service broadcasting as a current affairs programme on the tsunami or one on health care in Cambodia.
- 3.1.6 We believe the new BBC Charter and the concept of 'public value' will help to ensure that television and new media content continues to be a stimulus to active citizenship. The BBC now has a crucial role in helping citizens make sense of the wider world and in encouraging them to engage with it. The key to this will be participation, thus members of the public are not part of a passive audience to be entertained and informed but active, inspired participants.

Channel 4

- 3.1.7 In our view, Channel 4 has a critical role to play as a publicly owned corporation, to act as competition for the BBC and other public service content providers. As a public service broadcaster Channel 4, like the BBC, plays a significant role in helping UK citizens understand the world and to appreciate different cultures and viewpoints. It is essential that the Channel remains a not-for-profit state-owned broadcaster with a clear commitment to public service broadcasting in order to maintain plurality in the digital age. We would strongly oppose any attempts to privatise Channel 4 or to turn it into a public limited company. If Channel 4 remains publicly owned, it will compete with the BBC and UK citizens will benefit from this creative competition. If it were privatised, its shareholders would be likely to prioritise commercial success above the need for quality public service content.
- 3.1.8 Channel 4's strong track record of innovation has ensured that, whilst other broadcasters have been losing audience share, it is the only terrestrial broadcaster to have gained audience share in 2006 – up 0.1% to 9.8% . Its record of innovation will help to ensure that public service broadcasting continues to reach mass audiences.
- 3.1.9 IBT welcomes the fact that Channel 4 has extended its public service ethos to its digital channels, in particular More4.
- 3.1.10 IBT welcomes Ofcom's inquiry into Channel 4's financial future, and its attempt to set a benchmark for the channel's public service content. Without this benchmark, it will become increasingly difficult to assess how far Channel 4 is fulfilling its public service remit.

Plurality – Other Channels/Platforms

- 3.1.11 Whilst the BBC and Channel 4 should remain the principal pillars of public service television, we believe that ITV and Five should continue to have a role to play. In 2006 Ofcom estimated the value of the EPG and other benefits combined was £25million per annum. Although these benefits may have only a relatively small financial value, this should nevertheless be reflected in a continued commitment to public service programming. We would like to see them maintain a commitment to domestic and international news and current affairs and a broad range of factual programming until there is further, more substantial evidence that this commitment is undermining their commercial viability.
- 3.1.12 It is likely Ofcom's suggested Public Service Publisher will also provide greater plurality in public service content and this could have a positive role to play in ensuring continued competition and innovation. However, in order to justify the creation of such a content provider, it will need to be proven that there is a segment or are segments of audience which are currently being under-served. If this is discovered to be the case, IBT supports the creation of the Public Service Publisher because it could have the potential to reach new audiences which may be under-served by traditional public service television broadcasting.

3.2 Term of Reference 2: The practicality of continuing to impose public service obligations on commercial broadcasters

- 3.2.1 It is self-evident that commercial broadcasters, such as ITV and Five will continue to enjoy some benefits in the post digital age (for example, the value of their EPG positioning- see para 3.1.11 above).
- 3.2.2 It is likely that in the digital age ITV and Five will continue to attract a significant share of audiences. The latest research on viewing figures in the future, commissioned by *Broadcast* magazine from David Graham & Associates (DGA), suggests that, if present trends continue, in 2012 ITV1 will have a 17.83% share and Five will have a 5.14% share. ITV's total family of channels is likely to have an overall share of 22% by this date. Given the fact that the BBC and Channel 4 will have significant public service obligations, there is a strong argument for ITV and Five to retain some similar obligations. No other commercial broadcaster is likely to have such a significant audience share. For example, Sky One, according to DGA, will have only a 1.50% share.
- 3.2.3 IBT believes that in return for these benefits, ITV and Five should continue to have public service obligations, for example, in providing domestic and international news, current affairs and a broad range of factual programming as well as commissioning from UK suppliers. It is especially important that in the digital age there is plurality of news supply and a strong UK production base. This commitment should be pending substantial evidence that despite good

management their public service commitment is undermining the companies' commercial viability,

3.3 Term of Reference 3: The viability of existing funding models for ITV, Channel 4 and Five

- 3.3.1 The DGA research cited above (in paragraph 3.2.2) demonstrates that ITV, Channel 4 and Five will all maintain a strong audience share for the foreseeable future but this alone does not demonstrate that the existing funding models are viable because of predicted falls in broadcast advertising revenue. Commercial channels will have to adapt to counteract the drop in broadcast ad revenue and it remains to be seen whether they succeed in remaining commercially viable.
- 3.3.2 In December 2006 Jim Marshall of the IPA forecasted to Ofcom that total TV advertising will decrease by 1.8% by the year 2010 while the overall advertising market will be 2.5% up. This is accounted for by the steady increase in internet advertising and is a structural reflection of the marketplace. The impact this decrease in revenue will have on ITV, Channel 4 and Five remains to be seen, but it is also predicted that production costs will rise during the same period, putting further pressure on commercial channels to sustain audience share.
- 3.3.3 Despite the apparently negative environment, commercial broadcasters are bullish as can be seen by Charles Allen, ITV's departing CEO, when he delivered the MacTaggart lecture at Edinburgh's 2006 Television Festival: *"ITV is not a legacy analogue business. In digital homes, we have three of the top 10 commercial channels; in Freeview, four of the top 10. We have the UK's number one participation TV business. The strongest commercial position on DTT. And, in Friends Reunited, the UK's top commercial web presence.... We made our savings, doubled our profits and created a unified national broadcaster. We've built the UK's top commercial production company - with major international success. We're the only non-US producer ever to have shows on all 5 US networks at the same time."* Albeit anecdotal evidence, there is general consensus in the television industry that ITV and Five TV are well positioned to cope commercially in 2012 and beyond.
- 3.3.4 In conclusion we believe the existing funding models for ITV and Five should remain in place pending evidence that their public service commitments are significantly undermining their commercial viability.

Channel 4

- 3.3.5 The result of the current Ofcom Channel 4 Review will be instrumental in determining whether the current funding model for Channel 4 will be sustainable in the future. Whilst IBT holds that its present funding model is viable, we accept the Channel's argument that in the future its ability to deliver in full on its public service remit may be severely hampered by the present funding model. It is impossible to give a definitive answer to this question at this stage, but we

welcome Ofcom's investigation into the channel's finances and delivery of its public service broadcasting remit and believe that the answer to this question will become clearer in due course.

- 3.3.6 As stated above (in paragraph 3.1.7), the competition provided by a strong Channel 4 with a distinctive and clearly defined public service remit is an essential prerequisite for public service broadcasting to continue to thrive in the UK, therefore if Ofcom determines that extra funding is required for Channel 4 to fulfil its public service remit, IBT would support this move. We stress however that we believe it is vital that this funding is separate from the BBC licence fee. If the licence fee were divided among a number of broadcasters, we believe the future prospect of the BBC fulfilling its public service remit would be under threat.

3.4 Term of Reference 4: The case for public funding of broadcasters in addition to the BBC

- 3.4.1 There is no evidence that providing small sums of money to a range of broadcasters would significantly strengthen public service broadcasting as a whole.
- 3.4.2 If funding provided to the BBC by the licence fee were diverted to other broadcasters it is our opinion this would undermine public support for, and understanding of, the purpose of the licence fee. In turn, this could ultimately undermine the BBC.
- 3.4.3 In a marketplace which is diversifying and fragmenting, greater competition for viewers on commercial channels will mean public service content will become increasingly scarce. Therefore it is more crucial than ever to support Channel 4 and any other public service broadcasters, whether this is directly through investigating a plural funding mix which could include public funding, or indirectly through other benefits, such as positioning on the Electronic Programme Guide.
- 3.4.4 As stated above, in paragraph 3.3.5, there is a potential case for Channel 4 to receive public funding as part of a plural funding mix, but on two conditions: that it remains a not-for-profit state-owned corporation (see paragraph 3.1.7 above) and that this funding is not taken from income generated by the licence fee (see paragraph 3.4.2 above).
- 3.4.5 IBT is strongly opposed to commercial broadcasters, as public limited companies, receiving public funding because their primary aim is to maximise profit for their shareholders. Whilst there may be individual programmes or series of programmes broadcast by channels such as Discovery and National Geographic which bear the hallmark of public service broadcasting, we believe that this alone

does not represent a strong enough justification for public subsidy because this public funding could ultimately benefit their shareholders rather than the general public.

3.5 Term of Reference 5: The future of key areas of public service media content such as news provision and children's programming

3.5.1 Since IBT's interest in making this submission lies in proposing the argument for maintaining the quality, diversity and quantity of programming concerning the 'wider' world, we will restrict our focus to programming which fulfils this purpose. Therefore when we refer to programming in answer to this question, it is specifically with reference to international-content programming, whichever genre heading it is broadcast under.

Definition of Public Service Broadcasting

3.5.2 The Communications Act 2003 defined public service broadcasting for the first time in UK legislation. This was the result of public consultation and lengthy debate both within and outside Parliament. The Act's definition of public service broadcasting and its purposes still hold good, namely that public service television should provide 'programmes dealing with a wide range of subject matters...in a manner which...is likely to meet the needs and satisfy the interests of as many different audiences as practicable...' and in the form of services 'for the dissemination of information and for the provision of education and entertainment.' (section 264)

In particular, the Act contains two public service obligations with regard to international programming:

- That there should be comprehensive coverage of news and current affairs stories from the UK 'and around the world';
- That there should be Tier 3 (non-news) general programmes about 'matters of international significance'.

News

3.5.3 Thus it is clear that independent, adequately-funded television news and current affairs programming are considered to be vital parts of public service broadcasting. In addition, in order to provide a variety of perspectives to 'satisfy as many different audiences as practicable', it is also clear that plurality is required amongst news providers. We would like to stress our view that therefore the commitment of providing news and current affairs programming on all channels with public service obligations should remain in place.

3.5.4 The broadcasting and new media markets are and will continue to be increasingly competitive as they fragment. This increased competition is likely to lead to less public service content on air in the chase for viewers. Where commercial interests and public service interests coincide (such as in some natural history programming, for example) public service content will probably remain on

popular platforms. More generally, however, this rise in competition will preclude the broadcasting of public service news content unless platforms are obliged by law to do so. As the value of their licences diminishes towards 2012, it is likely that ITV and Five will argue that the public service content obligations currently imposed on them will be financially unsustainable. In conclusion, on commercial channels it is likely public service content will be increasingly scarce. We believe there is a strong argument for continuing an obligation on these broadcasters to provide domestic and international news in peak time in return for the value of their positioning on the Electronic Programme Guide and the, albeit reduced, value of their licences.

International Content

3.5.5 In addition to news provision and children's programming, another key aspect of public service is international content across all genres. As has been seen above, the BBC and Channel 4 have shown strong commitment in this area. If, in future, public funding for the BBC continues to provide the corporation with sufficient funds to produce independent, properly-researched international programming across all genres then, in IBT's opinion, the future of public service content of international interest on the BBC is secure. Equally, if Channel 4 is supported to provide the same, then the same applies. However, this point is made with the assumption that the BBC Trust will regulate effectively in implementing the public service requirements of the new BBC Charter and that Channel 4 will be obliged to continue to fulfil its remit as it currently stands.

3.6 Term of Reference 6: The value of the Public Service Provider concept as advanced by Ofcom.

- 3.6.1 The UK has a unique model of public service broadcasting, perhaps stronger, more distinctive and more innovative than that of any other country in the world. This model has always benefited from the arrival of new players. The BBC rose to the challenge posed by the arrival of ITV. The BBC and ITV benefited from the presence of Channel 4. We believe that the arrival of the PSP could provide a similar stimulus for innovation. IBT welcomes Ofcom's proposal for a Public Service Publisher and keenly anticipates seeing its more detailed proposal when it is published later in 2007.
- 3.6.2 IBT accepts the argument put forward by Ofcom, that the present subsidy to public service broadcasting will diminish after switchover and that the value of this lost subsidy will be in the region of £300 million per annum.
- 3.6.3 IBT welcomes Ofcom's ambition to encourage competition and innovation in public service provision and in particular to encourage public service content online which we believe is inherently an international medium.

- 3.6.4 IBT agrees that the Public Service Publisher will need to provide public service content which is not already being provided at present and will need to cater for audiences which are currently not being adequately served by established forms of public service broadcasting.
- 3.6.5 IBT agrees with Ofcom that the service should be put out to competitive tender in order to appoint the most appropriate provider which could be a new organisation rather than an established broadcaster like Channel 4 or the BBC. It is IBT's opinion that if a traditional 'old media' operator were to run the service, that content would be commissioned 'top down' (commissioners operating using a traditional broadcasting model). If, however, the content could be commissioned 'bottom up' with a grassroots approach, this would provide a platform for material from new, non-traditional sources, thus permitting participation by a greater number of people and reflecting trends which can already be seen in new media, such as provision of news footage from mobile phones etc.

International Approach

- 3.6.6. The internet, as an inherently global medium, offers the perfect opportunity for active global citizenship and for UK citizens to engage with citizens in other countries on the issues which affect them. IBT therefore argues that the PSP should be given specific responsibility to be truly international, both in terms of its content but also in terms of its use of interactivity.
- 3.6.7. There is an opportunity provided by new media to feed '100 tribes' of interest and exchange, expanding and developing the interactive and community functionality which traditional broadcasters can only do up to a point. Thus the PSP would provide a truly international perspective of the UK's place in the wider world – linking people here to people around the world in dialogue and exchange on themes they find mutually interesting. In this way the PSP will achieve the goal (as set out in paragraph 3.6.4) to serve a new audience, by approaching content from a completely different perspective from traditional media, reflecting a wider variety of voices and opinions and providing content and approach which is not adequately available elsewhere on UK media platforms.

3.7 Term of Reference 7: The case for provision of public service material on new media

- 3.7.1 We believe that it is inevitable that new media platforms will become a major source of information about the wider world. According to Ofcom's recent international survey (*Communications: The Next Decade*, November 30th 2006) a third of British internet users watch less television once they have broadband, while 27% read fewer national newspapers and almost a fifth switch off their radios. The picture is similar across France, Germany, Italy, Japan and the US, highlighting the threat posed by the web to traditional media.

- 3.7.2 Despite the turn away from traditional television and 'old' media such as the BBC, the Ofcom survey (above in paragraph 3.7.1) shows 64% of British consumers believe public service broadcasting is "definitely necessary". IBT believes the challenge will be to combine the ethos of public service broadcasting with the technology of new media in order to engage new audiences.
- 3.7.3 One self-evident impact of convergence is that the world is increasingly becoming a global community where communication is global and information take-up is global. Within this context, we believe it is crucial that users/audiences in the UK understand what is happening in the wider world outside the UK and therefore, we argue that there is a strong case for public service content which reflects this wider world to be encouraged on new media platforms. While IBT believes it is inevitable that there will always be new media public service content, it will not necessarily be publicly-funded and there will be no guarantee of quality, plurality, accessibility and diversity. We would like to see the provision of public funding in order to create high quality public service content which wouldn't be provided otherwise.
- 3.7.4 IBT welcomes the fact that current public service providers, Channel 4 and the BBC, are active on new media platforms. We believe this will enhance public service content on new media platforms considerably.

4. IBT Recommendations

BBC

- 4.1 IBT urges the Department of Culture, Media and Sport to ensure that the new BBC Trust's work in monitoring and maintaining the BBC's performance in public service broadcasting takes place in a highly visible and transparent way, and that there are opportunities for citizens to voice their opinions. In terms of international programming, we believe it is vital that the BBC's purpose of 'bringing the world to the UK' is not limited to news and current affairs or to its minority channels (BBC3, BBC4) but that this purpose applies to all channels, genres of programming and services.

Channel 4

- 4.2.1 In order to ensure plurality in public service content, we recommend that Channel 4 is supported and remains a public corporation. To aid Channel 4 in fulfilling its public service role, the Government and Parliament will need to ensure that its public service remit is clearly defined and monitored. We also believe that it will become necessary for there to be greater transparency about what exactly Channel 4 is expected to achieve to fulfil its remit.
- 4.2.2 Whatever the outcome of the Ofcom inquiry into Channel 4's financial future, IBT urges that serious consideration is given to ways in which the channel can be supported, whether directly with a plural funding mix which could include public funding or indirectly, through gifted access to additional DTT capacity and collaboration with the BBC over digital switchover.
- 4.2.3 We would like Channel 4 to have the opportunity to present its case for public funding, for Ofcom to have the opportunity to present its evidence and for there to be an opportunity for public debate on the matter. We believe that the final decision on whether to provide public funding to Channel 4 should lie with the government and parliament, but not with Ofcom, an unelected regulator.

ITV/Five

- 4.3.1 In order to ensure that plurality of news supply and a strong UK production base are maintained, we recommend that ITV and Five continue to have public service obligations beyond switchover to digital until such a time as there is substantial evidence to prove that their public service commitments are undermining their commercial viability. We would like to see domestic and international news in peak time as well as a wide range of factual international programming .
- 4.3.2 We would recommend that the current funding models for ITV and Five should continue and that any broadcaster which has a 5% or greater share, should be subject to similar light public service obligations.

Public Funding of Other Broadcasters

- 4.4 In order not to undermine public support for the licence fee, we strongly recommend that the proceeds from the licence fee are ring-fenced for the BBC. If further funding is made available, in addition to that provided to the BBC by the licence fee revenue, it should go to Channel 4 and any other publicly owned public service content providers that may exist. IBT strongly recommends that under no circumstances should public money be awarded to any public limited company.

New Media

- 4.5 IBT recommends that the production of public service material should be encouraged on new media platforms because the younger generation is likely to obtain much of their information about the world around them from new media sources. We believe that it is crucial as global citizens that the public is engaged and informed about the wider world via new media platforms and has the opportunity to link with citizens elsewhere in the world. Without any other form of regulation in existence for the internet, IBT would like to see discussion of how best to ensure that there is good quality pluralistic public service content available online, including the possibility of public funding for new media public service content and platforms.

Public Service Publisher

- 4.6.1 IBT welcomes the concept of a Public Service Publisher but recommends that such an organisation is created to specifically redress current deficits in content on new media platforms.
- 4.6.2 IBT believes that the greatest deficit in content at the moment is a wide range of global points of view accessible for a UK audience. In a now 'globalised' world, we recommend that the public service publisher should have an obligation to provide content which both covers matters of international significance and also provides alternative perspectives of the UK as well as international issues which affect the UK.
- 4.6.3 In addition, we recommend that this provision should fully exploit the opportunity to link people in the UK to other people around the world in dialogue and exchange on issues which they find mutually interesting.
- 4.6.4 IBT recommends that the content of the Public Service Publisher is managed by a new organisation rather than by one of the existing traditional broadcasters.
- 4.6.5 IBT urges that there should be a wider public discussion about the Public Service Publisher and where its priorities should lie. We believe that Ofcom's proposal needs to be subjected to full democratic debate, scrutiny and consultation.