

19 January 2009

**Broadcasting Committee of the Church of Ireland
Response to Consultation: OFCOM
Public Service Broadcasting Consultation Phase 2 Response**

Model

The Church of Ireland Broadcasting Committee strongly prefers a model that will deliver sustainable volumes of public service broadcast content including religious programming and a model that guards the quality of public service broadcast content. Diversity and accessibility are key to the Committee's understanding of PSB. Given the current global economic situation, the Broadcasting Committee believes it would be prudent to safeguard the role of the BBC in providing PSB content and to address sustainable funding for this as a priority. Looking at the analysis provided, it is evident that commercial producers have struggled to deliver PSB content even during a period of relative commercial prosperity. It is, therefore, highly unlikely that profit-focused broadcasters will be able to deliver a sustainable commitment to PSB content generation during a severe economic downturn. There must be a question as to the correctness of directing public funds to organisations that cannot guarantee delivery of PSB content.

However, while our primary focus would be on the role of the BBC and how it may be funded, the Committee is not oblivious to the contribution made by other organisations to PSB. If sufficient resources can be identified, it would be desirable to have a mechanism that allows other organisations to produce PSB content as and when they are able to do so; the model that permits competition for funding sounds attractive. However, if scarcity of resources resulted in a choice being made between guaranteeing PSB content via one primary organisation (the BBC), and establishing a fund for which other organisations or producers might compete, the Broadcasting Committee would focus on the role of the BBC as the primary objective.

Nations and regions

The current system is struggling to maintain strong PSB content in the regions, or nations, and also battles to deliver in the area of faith-based PSB content. It is to be hoped that a new model will strengthen these areas. The Church of Ireland Broadcasting Committee is concerned that the overall development of an open market culture and competitively-based broadcast media industry is diminishing the capacity of any organisation, including the BBC, to deliver quality PSB content. While this is evident at central level, the effect is exaggerated at the level of nations and regions. **Model 1**, Refined Evolution appears to offer a basis for development of PSB in Northern Ireland more than the other two models. It also offers support to UTV through the engagement of the ITV network, although the Committee would like to see UTV extend its production of public service content to include religious content.

Funding

The Broadcasting Committee did not feel it is in a position to comment on the funding options, beyond a perception that the situation regarding PSB at the BBC needs to be resolved as the first priority.

Section 7 and Annex 1 – proposals for short-term regulation

The Broadcasting Committee noted that UTV has delivered particularly well in terms of news and current affairs content, making a substantial and significant contribution to public service broadcasting in Northern Ireland. However, the lack of religious programming is a distinct cause of dismay to the Committee. The primary concern of the Broadcasting Committee in respect of Section 7 and Annex 1 was with the reduction in PSB content by UTV to maintain the cost-benefit ratio. While this may be necessary in economic terms, it is unfortunate that there seems to be no way of maintaining the level of local programming during a period of important social and political transition in Northern Ireland. It also seems to diminish any possibility of including significant religious programming in the UTV PSB mix, and this is deeply regretted by the Broadcasting Committee of the Church of Ireland.

Submitted on behalf of the Broadcasting Committee of the Church of Ireland

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