

*"Working for quality  
and diversity in  
British broadcasting"*



PO Box 401, Gravesend, Kent DA12 9FY  
Telephone: 01474 338716  
Fax: 01474 325440

Founded in 1983 by Jocelyn Hay CBE

E-mail: [info@vlv.org.uk](mailto:info@vlv.org.uk)  
Web: [www.vlv.org.uk](http://www.vlv.org.uk)

## **Response from the Voice of the Listener & Viewer to the BBC Trust service review of BBC Online and BBC Red Button**

*Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British broadcasting system.*

VLV welcomes the opportunity to respond to the second BBC Trust service review of **BBC Online** and the **BBC Red Button** service.

### **Introduction**

VLV has supported and commented on the adoption of all new communications technologies by the BBC and responded to the initial service reviews of [bbc.co.uk](http://bbc.co.uk) in December 2007 and the Red Button service in December 2009. We have supported and commented on the iPlayer at several stages of its development. Comments on the BBC websites and the use of the internet in general have featured in several other responses VLV has made to service reviews in the past. We have also welcomed the integration of the many platforms available to the BBC for communicating its output.

In light of VLV's appreciation of the importance of multi-platform content it has initiated an award for a programme or series which utilises the best elements of the all platforms now available to broadcasters as one of our Annual Awards for Broadcasting Excellence. This was awarded to the BBC's *Symphony* in 2011.

### **General points**

1. In order to make use of BBC Online, citizens need to have access to the internet. Around 24% of the population still do not have internet access in the home. However, this is a significant improvement on the 2007 figure of 64%, but access has remained unchanged in the last year. (*Internet Attitudes and Access Ofcom July 2011 and 2012*)

2. Those who have internet access in the home need to have a sufficient understanding of the internet to make full use of the site.
3. BBC services do acknowledge this digital divide and provide alternative sources of information or communication in many instances.
4. VLV, however, is concerned that much of the supplementary content for programmes provided on BBC websites is not available in any form to a significant number of viewers and listeners. This is particularly important as the elderly are avid consumers of both radio and TV and make up a significant proportion of those without internet access in the home. The Ofcom data above indicates that internet access is still below 50% for those over 65.
5. Broadband speeds. To make full use of the iPlayer, especially for time-shifted TV viewing, the citizen needs to have a satisfactory broadband connection speed. There are still rural communities where internet speeds are inadequate and it will be some years before this is rectified.
6. When the BBC Trust agreed to the iPlayer facility, they imposed limits on the amount of time a programme would be available and how long it could be viewed or listened to. We understand that this was to protect the interests of other broadcasters and the manufacturers of DVDs and CDs. While podcasts on BBC Radio services have significantly extended the availability of many radio programmes, the limits on television programmes are often effectively seven days after broadcast. In many instances this is a shorter digital window than with other broadcasters. It is a blanket time limit and ignores the huge changes in the market since 2007. We ask the Trust to urgently reconsider the limits, so that material paid for by the licence fee payers is available for a more reasonable length of time after broadcast to maximise the benefits to licence fee payers.
7. A unique feature and benefit of all BBC Online services available in the UK is the total absence of advertising and commercial content. This means that the pages can be totally devoted to content, related to programmes or news. It also means that many pages have an uncluttered appearance.
8. A significant impact of BBC Online is that it is now possible to access all the current radio and TV output of the BBC anywhere in the UK. Additionally, most radio services are available, via the internet, across the world. Much of this material is available for deferred listening and viewing. Now it is of course possible to listen and view on smart phones and tablets.

9. Given that the BBC is continuously struggling to find cost savings, and the concern which VLV, amongst many, has about the effects, on programme quality and range, of the DQF cuts, the sheer scale of the BBC Online sites and the costs of keeping it up to date are a serious issue which needs to be monitored.

## **Specific Questions asked in the consultation**

### **1. How well are these services performing against the terms of their service licence?**

#### **a) To what extent are these services providing high quality and distinctive content?**

Since the overhaul of the service and the closure of many peripheral sites, the main BBC websites have been driven by BBC programmes. The service now reflects the general high quality of the programmes it serves and enhances. Much of the content is distinctive, adding to the content of the original programmes.

#### **b) To what extent are these services being used?**

As an organisation with limited resources we do not have independent data on this aspect of the review.

#### **c) To what extent are these services contributing to the BBC's public purposes?**

##### *(i) Sustaining citizenship and civil society.*

News and factual programmes on television and radio make a significant contribution to this public purpose. Most of these programmes are supported by a website which provides additional information. In the case of news, a range of coverage from across the BBC is highlighted by links which means that users have access to neutral background and information on most news items. See also purposes 2, 3 and 4 below which are essential for an informed citizen.

##### *(ii) Promoting education and learning*

VLV believes the BBC should continue to make very good use of the internet to promote learning and knowledge. There is good provision of easy-to-access information from the BBC Homepage, providing engaging and intelligent information and videos, as well as links to external sites.

##### *(iii) Reflecting the UK's nations, regions and communities.*

As noted at paragraph 9 above, services that were only available in specific UK nations or more locally are now available to everyone across the UK via BBC Online. This has the potential to increase knowledge and awareness of other communities in the UK.

*(iv) Bringing the UK to the world and the world to the UK*

Most radio services are available via the internet across the world. This has resulted in a very significant increase in listening around the world to many BBC Radio services, thus helping to bring the UK to the world. The BBC News web pages provide more international news than many TV and Radio News broadcasts, so there is a potential for bringing the world to the UK.

*(v) Emerging Communications*

In order to use the BBC Online service it is essential to have access to and understand the internet. Since the launch of [bbc.co.uk](http://bbc.co.uk) the BBC has used this service to promote greater use of the web and email. Many programmes promote the relevant web sites. Many web pages and programmes encourage the use of email and more recently Facebook and Twitter. However, see the general comments above, on our concern that the digital divide and poor broadband speeds can reduce the achievement of this public purpose.

**d) Are these services good value for money?**

Although VLV has concerns that the BBC Online services are not strictly universally available we still consider that they represent good value for money with a total budget of £109.1 million.

**2. What is the future strategic direction for these services?**

We ask the BBC Trust to consider requesting that the Executive make proposals to address our concerns at general points 4, 5, 6 above and point 4 below.

**3. Should the services licences for these services be changed?**

In view of recent changes there are no significant changes required.

---

**BBC Red Button service review**

VLV made comments on the BBC Trust's first Red Button service review in 2009, saying that in general the members were satisfied with the BBC Red Button service, in so far as it replaced Ceefax, although some users felt it ran rather more slowly than the terrestrial service.

The BBC Trust's 2010 review said that "Red Button reaches a large audience and is effective in helping the BBC promote some of its public purposes, but it is not as popular as the BBC's other interactive services such as the iPlayer and its overall costs - particularly for distribution - are substantial."

## General points

VLV offers some general points only on the BBC Red Button service, as usage is specific to each viewer.

1. Now that digital switchover is completed all viewers are able to have access to the Red Button Service.
2. Red Button, which the BBC says is now used by more than 20 million people each month, has recently reduced the number of live video streams for subscribers of Sky, Virgin or Freesat television services. The BBC says this because these services rely entirely on linear broadcast technologies, which are not cost-effective for an interactive service like the Red Button. Access is varied according to which delivery service viewers use – which is confusing for consumers.
3. Convergence means that there is no longer one way to use all that the BBC offers – both immediate broadcasts and information beyond the broadcasts. There is a plethora of ways to access television and radio programmes, BBC Online information and Red Button services. Again, this can be very confusing for the audiences.
4. The introduction of enhancements to BBC services needs to be carefully considered. It is essential that any improvement in services is available to as many licence fee payers as possible. An example of the limited release of an enhancement is the launch, during the period of this consultation, of the **BBC Connected Red Button** service. This is an enhancement of the iPlayer only made available to Virgin Media subscribers. As a short term trial this may be expedient, however we hope that this is not a precedent for future releases of new developments.
5. As costs were an issue in the previous Red Button service review and given the huge range of other sources of immediate information – especially smart phone and tablet technologies - VLV would hope that there are economies of scale which could be made, as the Red Button is only available to those sitting in front of a TV screen.
6. There can be a danger that information is added to the Red Button because it is there as a technology – rather than it being added for good editorial and production reasons.
7. VLV admires the pioneering use of the Red Button during the 2012 Olympic Games – an exceptional and landmark use which gave viewers access in an unprecedented way. It was noticeable during the Paralympics Games that Channel 4 could only have three channels of additional material.

8. Media literacy is still an issue – so that some licence fee payers are still incapable of accessing all that the BBC offers. There should be more onscreen information about how to use the Red Button service.

Voice of the Listener & Viewer

23 January 2013