

*Championing  
excellence and diversity  
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**RESPONSE BY THE VOICE OF THE LISTENER & VIEWER (VLV)  
TO THE BBC TRUST'S PROVISIONAL DECISION ON PROPOSED CHANGES  
TO BBC THREE, BBC ONE, BBC IPLAYER AND CBBC**

**October 2015**

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**INFORMATION ABOUT THE VLV**

Voice of the Listener & Viewer Limited (VLV) represents the citizen and consumer interests in broadcasting and speaks for listeners and viewers on the full range of broadcasting issues. It uses its independent expertise to champion quality and diversity in public service broadcasting, to respond to consultations, to produce policy briefings and to conduct research. VLV has no political, commercial or sectarian affiliations and is concerned with the issues, structures, institutions and regulations that underpin the British broadcasting system. VLV supports the principles of public service in broadcasting. It is a charitable company limited by guarantee (registered in England No 4407712 - Charity No 1152136).

**EXECUTIVE SUMMARY**

1. VLV made a submission to the BBC Trust's first consultation on these proposed changes in February this year and we refer to that document when making this submission.
2. VLV values the contribution BBC Three makes to engaging all audiences, including younger adult audiences, with a range of innovative, engaging content which broadens our understanding of the world, especially through its current affairs output which is distinctively different from any other current affairs programming available on television in the UK.
3. Taking into account conditions made by the BBC Trust in its Provisional Conclusions on proposals for BBC Three, BBC One, BBC iPlayer, and CBBC, VLV's position has not changed significantly since it made its submission to the BBC Trust in February 2015.
4. We oppose the closure of BBC Three as a broadcast channel because of the concerns highlighted by the BBC Trust in its Provisional Conclusions and the lack of definite assurance from the BBC Executive on the volume of original BBC Three content which will be broadcast on BBC One and Two.
5. VLV considers that the BBC needs to work harder to engage a young adult audience so that this sector of the audience maintains and develops a loyalty to the BBC. We agree that by moving content onto online platforms, some of this audience may be engaged, but there is a significant risk that some of it will also be lost and we are not convinced that the conditions required by the BBC Trust have been specific enough or met by the proposals of the BBC Executive.
6. There are indications that the public is looking for more innovation in broadcast content and BBC Three is the most innovative of the BBC television channels. Its scores for delivery of innovation have risen consistently in the Ofcom Annual PSB Reports since 2008.

7. The proposal to move content from a platform which is free at the point of use to one where the user has to pay extra for a broadband service undermines the fundamental principle of BBC broadcast services which are provided universally across the UK via DTT and radio.
8. While we understand that the proposals under consideration will lead to an extra investment in BBC Drama of £30million, we do not believe this is adequate justification for converting a potentially valuable broadcast channel into an online offering which only a proportion of the UK public will be able to enjoy.
9. VLV supports the BBC Trust's decision not to allow a BBC +1 channel.
10. While we welcome the proposals to be more innovative with the iPlayer, reflecting trends in the rest of the market, we do not believe that this should be at the cost of BBC Three remaining on a broadcast platform. We believe that the BBC's online platforms should play a complementary role to the BBC's broadcast services.
11. While VLV has argued in the past that it would be beneficial to extend the hours of CBBC until 9pm to provide viewing for older children, we do not believe that this should be a priority over BBC Three's continued existence on a broadcast platform.

## **INTRODUCTION**

12. VLV welcomes the opportunity to respond to this BBC Trust consultation.
13. High quality, engaging content on television across a range of genres which appeals to a range of different ages and demographics is essential if we are to be a well-informed society and maintain our democratic engagement with the world around us.
14. VLV values the contribution BBC Three makes in engaging a younger adult audience (16-34 year olds) with issues which are important to all of us.
15. Since we last made a submission on the proposed changes in February 2015, the BBC Trust has published its Provisional Conclusions and the BBC Executive has published its response to these conclusions. We have taken note of both these documents in making this submission.

## **BBC Three**

**Q1. Do you agree with our provisional decision to approve (with conditions) the closure of BBC Three as a broadcast channel and its reinvention online in recognition of the need to generate savings and to serve younger audiences in new ways?**

16. While we recognize that the BBC needs to generate savings and serve younger audiences in new ways and while we acknowledge the strategic rationale of the BBC modernising its portfolio in a financially challenging environment, VLV does not agree with the BBC Trust's provisional decision to approve the closure of BBC Three as a broadcast channel for reasons outlined below.

**Q2. Do you think that our proposed conditions are appropriate, given the concerns we identified in our provisional conclusions and the information provided by BBC management?**

17. We note the concerns highlighted by the BBC Trust in its Provisional Conclusions that for many young people television still remains important, that not everyone has an adequate broadband connection, and that the BBC Three audience has a higher proportion of BAME and CD2E adults than any other BBC television services who may not migrate online because of the additional cost of broadband.

18. And we note the conditions set by the BBC Trust for BBC Three to be moved from its broadcast platform onto an online platform. Namely, that its transition should be well-managed, that all long-form programmes commissioned for BBC Three should be broadcast on BBC One or BBC Two on a continuing basis, there should be clearer commitments to broadcast programmes on BBC One and/or BBC Two that appeal to a younger audience and a commitment to programme slots on broadcast television where creative risks can be taken with new talent and new ideas.

19. VLV considers that the BBC needs to work harder to engage a young adult audience so that this sector of the audience maintains and develops a loyalty to the BBC. We agree that by moving content onto online platforms, some of this audience may be engaged, but there is a significant risk that some will also be lost and we are not convinced that the conditions required by the BBC Trust have been specific enough to ensure that BBC Three content is also broadcast on traditional platforms.

20. There are indications that the public is looking for more innovation in broadcast content and BBC Three is the most innovative of the BBC television channels. Its scores for delivery of innovation have risen consistently in the Ofcom Annual PSB Reports since 2008.

21. To quote our earlier submission, VLV does not believe that we have been provided with enough detail by the BBC Executive to assure us that the reach of the type of innovative content which BBC Three has generated will be maintained through repeats on BBC One and BBC Two:

*BBC Three's delivery of the BBC's public purposes, especially through its current affairs and factual output, has been one of its great successes. It currently broadcasts 42 hours of new UK originated current affairs content a year. This*

would be significantly reduced, although it is not clear in the Executive's proposals to what degree. The Executive's proposal is to have five hours of long form content available online each month (60 hours/year), but this includes comedy, comedy entertainment, long form factual and authored documentaries. There is no indication what proportion of this would be current affairs/serious factual and what proportion of this content would be broadcast on BBC One or BBC Two.

The wording of the proposal from the Executive to the BBC Trust relating to the transmission of content on BBC One and BBC Two is very weak and provides no guarantee of this content being broadcast on a mainstream channel.

**We would like** BBC Three long form programmes (approximately one to two hours a week, at least initially), to continue to have a transmission on BBC One and BBC Two. This will help to address any concerns about lack of universality and will also help to bring BBC Three content to a wider audience. We would like to show all BBC Three long form commissions on either BBC One (potentially in a branded BBC Three time zone after the 10 O'Clock news) or BBC Two (again late night)<sup>1</sup>.

We echo the concerns of those who were involved in the deliberative audience research commissioned by the BBC, that 'they were losing access to a lot of content that they liked and this would not be replaced by the content going online which they felt they would need to seek out'.<sup>2</sup>

While we welcome the ambitions set out in the editorial priorities under the main pillars of Make me Laugh/Make me Think and welcome the goal To meet these objectives BBC Three will focus on telling stories that open minds, bringing a global perspective to a diverse British audience<sup>3</sup> we do not believe the proposals will provide enough reach to ensure impact.<sup>4</sup>

22. With reference to Para 4.1.2 of the BBC Executive's response to the BBC Three PVT provisional conclusions, there appears to be a significant resistance from the BBC Executive to commit to a level of spend, number of hours or portion of schedule within BBC One or Two.<sup>5</sup> There has been no reference at all in the proposals made by the BBC Executive to the number of hours of long form content which will be produced for BBC Three as part of its new Service Licence and without this detail, VLV cannot support the proposal to move it online with its long-form content being broadcast later on BBC One or BBC Two.

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<sup>1</sup> Public Value Assessment of the re-invention of BBC Three online and related proposals  
Submission to the BBC Trust, BBC Executive, January 2014, p31

<sup>2</sup> Deliberative audience research into the proposed changes to BBC Three, BBC iPlayer, CBBC and BBC One + 1, PAPA, September 2014, p 73

<sup>3</sup> Public Value Assessment of the re-invention of BBC Three online and related proposals  
Submission to the BBC Trust, BBC Executive, January 2014

<sup>4</sup> VLV Submission to the BBC Trust, February 2015

<sup>5</sup> BBC Executive's Response to the BBC Three PVT provisional conclusions, July 2015

**Q3. The conditions we have proposed for BBC Three are also designed to address our concerns about the accessibility of an online-only offer for certain audience groups, such as those without access to a reliable internet connection. We have done this by requiring that all long-form BBC Three programmes are also broadcast on BBC One or BBC Two. Do you agree with these conditions?**

23. We agree with the Trust's conditions in relation to all long long-form BBC Three programmes also being broadcast on BBC One or BBC Two, however we are concerned that the BBC Executive does not appear to have accepted these conditions. As stated above, we have been provided with no information on how much content produced for BBC Three will be broadcast on BBC One or BBC Two and therefore cannot support the proposal to move BBC Three online.

24. As stated above, VLV opposes the closure of BBC Three as a broadcast channel because this will limit the reach and impact of its content and mean that it will not be available for many who do not have adequate broadband provision. The proposal to move content from a platform which is free at the point of use to one where the user has to pay extra for a broadband service undermines the fundamental principle of BBC broadcast services which are provided universally across the UK via DTT and radio.

**Q5. Do you agree with our provisional decision to reject the BBC One + 1 proposal?**

25. VLV supports the BBC Trust's decision to reject the BBC +1 proposal.

**Q5a. Why do you say that?**

26. As stated by the BBC Trust, this proposal failed the public value test. This service would not be available to everyone on Digital Terrestrial Television and around 24% of UK households would need to upgrade their equipment in order to receive it.

## **iPlayer**

**Q7. Do you agree with our provisional decision to approve the evolution of BBC iPlayer from primarily a catch-up service to one that also offers online-first BBC content and selected third-party content?**

27. While VLV welcomes the proposals to innovate with the iPlayer, reflecting trends in the rest of the market, we do not believe at this time that the BBC should focus its **primary** efforts online. It should continue to work on its development of the iPlayer but not at the expense of its broadcast offering.

28. It needs to be constantly stressed that only just over 80% of the population have access to broadband and it is therefore not a platform which is universally available. The BBC should produce content which is universally available, in accordance with the Charter and Agreement. This is the basis upon which licence fee payers support the BBC.

29. In this context, we approve the BBC Trust's provisional decision to allow third party content on the iPlayer because such content would not be funded by the licence fee, but

we do not approve of content funded by the licence fee being only available on the iPlayer.

#### **Q7a. Why do you say that?**

30. VLV is concerned that the BBC's current proposals to 'ride two horses' – one the traditional broadcasting model and the other the online model – seems sensible, but it must be remembered that while changes in technology and the market are having a profound effect on all broadcasters, Ofcom's latest figures show that the change in viewing habits from the traditional model towards mobile viewing is incremental and this is happening more slowly than many would have originally expected.<sup>6</sup> Our concern is that the BBC appears to be placing more emphasis on the online model than the traditional model.
31. Free-to-air terrestrial viewing is likely to remain the primary means by which UK citizens consume television for the foreseeable future and probably for the period of the next BBC charter. VLV is concerned by proposals that current broadcast channels, such as BBC Three, are to move onto online platforms. VLV believes that the BBC should continue to provide a range of content to mass audiences on its mainstream broadcast platforms in the coming Charter period. In order to do so it needs to remain of a sufficient size to provide a range of content to mass audiences and sustain its universality.
32. To quote VLV's submission to the BBC Trust in February this year:

*We note the BBC iPlayer is now used by 14% of adults each week in the UK and watching programmes on it accounts for 3% of all viewing of BBC television.<sup>7</sup> It is clear that the BBC's primary reach is achieved through its broadcast platforms.*

*While we acknowledge that the online world is playing an increasingly dominant role in our lives, live and recorded TV viewing is still by far the most popular media activity. As can be seen from the research commissioned for this Public Value Test, online behaviour is a very different process from linear television viewing.*

#### **Q8. We have recommended that the BBC should set clear, objective criteria for determining what third-party content could be included on BBC iPlayer. Do you think our proposed condition is appropriate?**

33. In our earlier submission, we strongly questioned the wisdom of the proposal to include content from partner organisations on the iPlayer. We opposed this move on the basis that it would dilute the clear branding of the iPlayer as a BBC service, that there could be issues of quality control and that key BBC public service content might become less easy to find if the platform becomes increasingly complex to incorporate other streams of content.
34. However, we are reassured by the BBC Trust's proposed condition in relation to the provision of third party content on the iPlayer and we believe that the BBC Executive's

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<sup>6</sup> PSB Review 2015, Ofcom, Para 2.12

<sup>7</sup> BBC Trust Review of BBC One, Two, Three and Four, 2014, p 9

response to the BBC Trust's condition sets out appropriate criteria to ensure that third party content will be managed in such a way as to deliver additional public service value.

### **CBBC Extended Hours**

**Q10. Do you agree with the BBC Trust's provisional decision to approve the extended hours for CBBC (so that, instead of broadcasting until 7pm, the service would continue until 9pm) as this will expand choice for younger viewers and can be implemented at minimal cost?**

35. While VLV has argued in the past that it would be beneficial to extend the hours of CBBC until 9pm to provide viewing for older children, who are currently underserved by any public service broadcaster in the UK, we do not believe that this should be a priority over BBC Three's continued existence on a broadcast platform.
36. As stated above, we do not approve the proposal to move BBC Three online unless we have reassurances of a minimum amount of content and a minimum expenditure on content which will be produced for BBC Three but also broadcast on BBC One or BBC Two.
37. If these assurances are made and they are considered adequate to ensure delivery of content which fulfils the Service Licence of BBC Three, then VLV would support the extended hours for CBBC.