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## THE BBC'S PROPOSALS FOR A LOCAL VIDEO SERVICE

### A Submission to the BBC Trust and Ofcom by Voice of the Listener & Viewer (VLV) August 2008

#### **Introduction**

1. The application by BBC Management to the BBC Trust for permission to establish a Local Video Service represents the results of a lengthy period of consultation and development by BBC Management, following the interest which has consistently been reported in audience research surveys that a substantial minority of listeners and viewers want to be more informed about local events.

2. In general terms, the proposal can be said to fulfil at least three of the BBC's Public Purposes, namely those of

- Sustaining citizenship and civil society
- Representing the UK, its nations, regions and communities, and
- ... helping to deliver to the public the benefit of emerging communications technologies and services ...

3. The central issue for VLV, and we imagine for the BBC Trust, is the role that the new proposal will play in enhancing and improving the BBC's Public Purposes.

4. At the same time, no matter how valuable the new BBC service may be, listeners and viewers will also want to preserve a choice in the local media that are available to them, and to this extent they will wish to be assured that the BBC's new proposals do not have a significantly adverse impact on the markets for alternative local media. At a time of projected economic downturn, it will be especially difficult for the BBC Trust to balance these conflicting demands.

#### **Choice of Medium**

5. It is clear from the pilot study that the original intention of BBC Management was to establish a service involving both local television and local video. But the proposal to include local television in the offer has now been dropped. The reasons for this are not entirely clear, but it would appear that satellite viewers complained about poor updates and unduly extended weather reports. Moreover, in his report on the Pilot Project in the West Midlands, Professor Laughton concluded that in the original proposal for linear television, even though news bulletins were scheduled to be broadcast at fixed times, they were unlikely to be live, which has traditionally been a key characteristic of current news services. This finding, linked to the fact that the cost per hour of the content and delivery service of the pilot service was more expensive than anticipated, would appear to indicate that the BBC Management has insufficient resources to roll-out a local television service.

6. On the other hand, Professor Laughton concluded that BBC Management had been correct to identify the BBC's local radio areas, - which are already the base for online services - as the organisational and editorial spine of future multi-media content delivery.

7. It appears therefore that the BBC Management now proposes to establish a local video service, which will be available on broadband and mobile, but which will only be updated on an intermittent basis. According to BBC Management, its proposal will only deliver in each local area "on average

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up to 10 new local video stories” “adding up to no more than an average of 20 minutes per day, with an additional offer of up to three short daily bulletins for each of news, weather and sport.” This would seem to offer users no more than a total of half an hour’s programming each day.

### ***Cross-Media Synergies***

8. On the other hand, the new service will be using the BBC’s local radio areas to commission and edit the online programmes. VLV is therefore surprised that the BBC Management has not sought to establish stronger editorial and public-oriented synergies between its established local radio services and its proposed local video services, possibly going so far as to establish a combined local radio and video service. As Professor Laughton noted, one of the potential benefits behind the original pilot for a local television service was that of “breaking down the barriers between existing media platforms, placing the emphasis of gathering original multi-media content.” Even though the proposal for a local television service has now been dropped, this benefit could also have been extended to its local radio service. After all, the BBC’s national radio service frequently uses the soundtrack of video-recorded interviews, which are also broadcast, indeed sometimes subsequently broadcast, on its national television service. Moreover, as Professor Laughton also noted, “the provision of additional news-gathering capacity in areas where there is often a monopoly news gatekeeper is another public good.”

### ***Extending Public Access to Local Services***

9. The primary function of the BBC Trust, as it asserted in its 2005 Public Consultation Briefing, is to act in the Licence Fee Payers’ interests, yet BBC Management is now proposing to establish a service which will only be available to those licence fee payers who are also paying for a broadband connection to the Internet. According to BBC Management, although the projected weekly reach of the new service, in 2012/2013 when it will attain “steady state”, will reach 17% of broadband households, it will only reach 11 per cent. of all UK households. VLV would therefore urge the BBC Trust to ensure that as many listeners and viewers as possible will be able to enjoy the benefits of the proposed local services. Given the editorial and financial limitations on its putative local television service, one way in which the BBC could achieve this would be to ensure that the proposed Local Video Service was an adjunct to a nationwide Local Radio Service. This would ensure that:

- As many UK citizens as possible would have access to the new local services whether on radio or via broadband;
- Citizens living in rural areas, who are currently unable to receive local radio services, would have broadband access to local video (and maybe local radio) services;
- Citizens living in one local area would have broadband access to BBC local video (and possibly local radio) services from another local area in which they may have a personal or social interest;
- The BBC could develop financial and editorial synergies between local radio services and local video services, which were specifically designed to sustain local citizenship and civil society. These might include live news broadcasts and complementary on-line video packages; interviews with local politicians or political activists which could be broadcast live, but also be made available as a local video story; and live radio commentaries of local sporting events, which were subsequently edited for an on-line video package;
- It would also be possible for the BBC to develop synergies in developing user-generated content, between community video packages and live broadcast telephone interviews, although we shall return in more detail to the issue of user-generated content below.

### ***Sustaining Citizenship and Civil Society***

10. The principal public purpose of the BBC is that of sustaining citizenship and civil society, and VLV hopes that the BBC Trust will require BBC Management to establish a more focused rationale for its proposed new service than that which has been developed so far. In order to do so, the

Trust will need to require BBC Management to articulate a far clearer distinction at the local level between the programme needs of the citizen and of civil society, and those of the average consumer. BBC Management will therefore need to demonstrate precisely how the local needs of citizens, and the local dimensions of civil society, will be sustained and enhanced by its proposed new service. News, weather and sport were certainly popular in the pilot project, but precisely how will they enhance citizenship? In VLV's view, it is insufficient for BBC Management simply to say that it will deliver an average of up to 10 video stories per day augmented with a few news stories and weather forecasts. These may be interesting, and indeed popular, but there is no guarantee that they will assist in sustaining citizenship or civil society.

11. Moreover, it is notable that new technological developments are hastening the advent of new local services, and if the BBC is to develop genuine public value in the provision of local services, BBC Management may well need to up its game. According to a recent estimate by Ofcom, local and devolved government in the UK is already spending £45-55 million per annum on on-line public content; and following the success of *Kent TV*, the *Local Government Chronicle* reports that four or five other local authorities are now planning to set up television stations in order to pioneer new methods of communication. (24 July 2008). Local newspapers and commercial radio stations also have plans to develop on-line activities. If the BBC's local services are to command respect among the public they must establish their presence, and the contribution that they make to citizens' lives, more forcefully. VLV considers that it was significant that when Professor Laughton sought to interview 60 local MP's and 12 Members of the Regional Advisory Council during the West Midlands Pilot Project for the new service, the results were, in his words, "underwhelming". It is essential that when the BBC does offer licence payers a new local service, it is one that has been specifically designed to ensure that the BBC can genuinely attempt to build public value, and not one which merely ticks a number of public purpose boxes, as the current proposal claims to do.

12. Central to a new definition of local citizenship is how the BBC intends to report both local elections and the activities of the local councils, be they metropolitan authorities, county councils, district councils or city councils. The BBC's traditional editorial values of accuracy, balance and due impartiality may well need to be revised and improved for local services where the BBC may be in competition with a service run by the public relations department of the local council, and where BBC reporters are frequently in close social and personal contact with the public relations officers of both public bodies and local community or faith groups. Moreover, local politics is often radically different to national politics. The dominant local party may be opposed to the politics of the government which is in power in Westminster. Indeed, in some localities, the Westminster government may have no elected political representatives. Precisely how, therefore, should BBC editorial policy exercise balance and due impartiality in these localities? Furthermore, in some local areas, fringe political parties which have little or no representation at Westminster can, and do, play an important role in local politics. At election time, the views of candidates from "fringe" parties, such as the Green Party or the BNP, are often virtually ignored by national services. Should the same rules apply to the coverage of local services? Precisely how should the BBC report the activities of fringe groups in order to "sustain citizenship" or to "sustain civil society"?

13. In other parts of the country, the division of powers between different public authorities may also require the BBC to implement a degree of "out-of-area" coverage, when for instance national planning decisions, the decisions of a primary care trust, or the highways decisions of a county council, can affect the lives of citizens who live in a small town. How, precisely, do the BBC's local editors plan to achieve a balance in reporting the views of national governments, or of county councils, when they are at odds with those of the dominant political party in the local authority? .

14. Similar issues arise around the role that BBC Local Services should play in sustaining "civil society". The BBC Trust has already identified significant performance gaps in relation to two key indicators. These are (a) whether the BBC helps citizens to feel more involved in their local

community [-21%]; and (b) whether the citizens feel that the BBC cares for their local community [-14%]. If BBC Local Radio has been unable to fill these gaps, precisely how will the proposed new Local Video Service manage to do so? Merely by establishing an online video service that will only reach 11% of households? Regrettably, the BBC Management's proposals simply assert, rather than analyse carefully, how the proposed new video service will help to close these gaps. How will half an hour a day of local video significantly change people's perceptions of whether the BBC helps citizens to feel more involved in their local community,? How will half an hour a day of local video convince people that the BBC actually cares for their local community?

### ***User-Generated Content***

15. The proposed local video service intends to include up to 25% of 'user-generated content.' This may well be a valuable development, although the precise meaning of the term is slippery, and varies between different media. In broadcasting it normally means audio or video programmes which have been prepared by local community groups, whereas online it may mean nothing more than a digital photograph accompanied by a written text. The BBC Management's proposal does not really explore the meaning of the term, although the proposal raises important editorial issues. In fact, to be precise, user-generated content is content which is generated by one user of a video service in order that it can be watched by another user of that service.

16. In establishing an editorial policy for any local service, the BBC has a series of difficult bridges to build, not only between itself and local community and faith groups, but also between itself and its listeners and viewers who are probably not members of those local groups. In order to fulfil both of the Trust's key indicators related to local services, the BBC will therefore need to ensure that its user-generated material will actually inform and educate its listeners and viewers in a manner which designed to sustain citizenship. There is little evidence in the BBC Management's proposals that these issues have been properly thought through.

17. There are several interlocking issues here. The first is for BBC Management to explain to the Trust how it will enable viewers and listeners to distinguish between genuine user-generated content and BBC-managed user-generated content. This is not simply a question of the BBC eliminating illegal material, such as obscenities or defamatory material, or of ensuring that there is no abuse of another person's copyright. There are more profound issues about who is the "author" of this allegedly user-generated content. There is already substantial ambiguity. As Professor Laughton noted, in the case of Rural Media in Hereford, "a single supplier was sub-contracted to provide community items." Who, then, was the "author" of these items? More often, as Professor Laughton also noted, "young BBC producers worked with individuals and organisations to help them get their message to viewers" Were viewers expected to regard these programmes as BBC programmes or as user-generated programmes? Or were they simply expected to accept them as parts of a seamless local BBC service? When they were broadcast, an appropriate statement by an announcer could probably clarify the issue, but how would an online service resolve these ambiguities?

18. On the other side of the coin, as BBC finance becomes more restricted, astute public relations officers for commercial organisations, or for nationally-based pressure groups, may seek to support the work of local community or faith groups by persuading them to become involved in surreptitious advertising, or product placement, or by providing them with nationally-generated video releases, into which their local activists could edit a few local inserts. Will BBC Management be able to guarantee to the BBC Trust that it has put adequate procedures in place at the local level, in order to avoid these editorial pitfalls? How will it ensure that 'user-generated material' which is included in its online services is not fulfilling some other public relations function?

### ***Capturing the Attention of Younger Viewers***

19. VLV recognises that one way in which BBC Management could reduce its performance gaps in relation to local services is by capturing the attention of younger viewers. It is often asserted that younger viewers prefer to obtain their news on-line, rather than from their television set, whereas older viewers prefer to use a more traditional medium. Certainly many younger people naturally turn to the newer medium. Moreover, a broadband service has the additional advantage that it can normally be watched at a time when the user chooses, rather than at the time when it is broadcast. It can also be watched by people living outside the local area who have a personal or social interest in the locality. On the other hand an online service, especially one which is downloaded onto a mobile phone, can also be expensive to use. In a period of economic downturn, the additional cost may therefore inhibit online use, even by younger users.

20. A second characteristic of on-line use, however, is that evidence shows that people tend only to watch those parts of the on-line offer that specifically interest them. This tendency may well be enhanced if the online service is expensive to use. It also means that there is no guarantee that users will watch those parts of the proposed local video service which are designed to sustain local citizenship or local civil society.

### ***Balancing Public Purpose against Online Availability***

21. VLV does not wish to argue that the BBC should not establish on-line local services, which can primarily be used by younger viewers, but in its proposal BBC Management fails to address precisely how these local services will be delivered to older viewers who prefer traditional broadcast media, or to those households which are not connected to broadband. Nor does it indicate how much the local video service will cost younger viewers to use, or how it will ensure that those users who do use it will watch the whole range of its output.

22. More seriously, the range of video programmes which BBC Management proposes to offer viewers seems implicitly designed to attract younger consumers, rather than younger citizens. VLV recognises that the BBC's local output needs to be available to everybody, both young and old, but it is concerned that in its efforts to attract younger audiences BBC Management appears to be relegating the BBC's primary public purpose of sustaining citizenship and civil society to a lower level than is desirable. While local news, weather and sport may well be popular, there is no guarantee that these programmes will sustain citizenship or civil society. Nor is there any promise that user-generated content will address citizenship or civil society issues.

23. There is also a danger that, in its attempts to reach younger audiences, BBC Management may be developing a local video service that will have an adverse market impact on its commercial rivals, although from the evidence considered by Human Capital and others, that impact would appear to be less than its potential rivals fear.

24. What would be serious, however, is that if BBC Management simply proposes to deploy populist programming in an attempt to capture a substantial audience share for its on-line local services, the BBC could effectively eliminate the opportunity for listeners and viewers to have access to local services which were designed to sustain citizenship and civil society at a local level, however these were delivered. Local commercial services are not in the business of sustaining citizenship and civil society, whereas the BBC should be.

### ***Conclusion***

25. Thus while VLV welcomes the BBC's initiative in developing a series of local services which would be available via broadband video, it would urge the BBC Trust to ask BBC Management to develop a local service which:

- Is available to all listeners to local radio services, as well as to broadband households;

- Is designed to establish complementarities and synergies between these two media services;
- Clarifies and focuses its public purpose in seeking online users;
- Rejects populist editorial policies which merely aim to capture large audiences at the expense of its commercial rivals;
- Includes editorial policies which are specifically designed to sustain citizenship and civil society at the local level;
- Enables listeners and viewers to distinguish clearly between BBC-produced content and user-generated content;
- Includes user-generated content which is prepared and edited to inform and educate listeners and viewers and designed to enable them to help sustain local citizenship and their local civil society, not merely to provide a platform for local community and faith groups;
- Ensures that the bulk, if not all, of this sustaining material is made available to users of its local video service.

*In short, VLV hopes that despite any financial difficulties, the BBC Trust will want to ensure that BBC Management will establish the Gold Standard for local media services which will sustain both citizenship and civil society at the local level for everybody. VLV is not convinced that BBC Management's current proposals will achieve this aim.*

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*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 does not handle complaints.*