

*“Working for quality  
and diversity in  
British broadcasting”*



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## Confidentiality statement

What do you want the BBC Trust to keep confidential?

Nothing	No part of this response is confidential.
Whole Response	
Part (please state which part)	

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Robert Clark  
Hon Secretary to VLV Board and contact for this response

Monday 24<sup>th</sup> May 2010

## **VOICE OF LISTENER & VIEWER RESPONSE TO BBC STRATEGY REVIEW MAY 2010**

*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*

### **INTRODUCTION AND SUMMARY**

VLV welcomes the opportunity to respond to this consultation on the wide-ranging BBC Strategy Review. It follows consultations by the Trust over recent years. VLV made contributions to most of these consultations and these have informed this response.

VLV has been critical of the BBC and we outline below some concerns about the details of the strategy. However we begin by stating our overall support for the BBC and the principles governing its funding arrangements.

VLV believes that the BBC remains a unique cultural institution which is greatly admired in the UK and around the world. Through its programmes and services the BBC provides a range of fascinating material to inform, educate and entertain the listener and viewer.

Its unique funding via the licence fee sustains the BBC's independence from Government and commercial interests. This independence is important not just to broadcasting but to democracy itself. The BBC is not driven by the need to deliver large audiences to advertisers and sponsors of programmes. All its services are free at the point of use and it is the only media organisation that does not carry any advertising.

We concentrate our response on considering the five high level strategic principles that have been proposed by the Director General.

### **SUMMARY**

In summary, our position on the Strategy is as follows. The VLV supports putting quality first as embodied in the five content priorities. We have included detailed comments on most of the five priorities as we consider the Executive should take these proposals further. We have also included criticisms of the concept of doing fewer things and doing them better, especially the cuts in services. We hope the Executive will make the licence fee work harder not by cutting programme production, but by introducing a slimmed-down management structure. The BBC should not create any hostages to fortune by removing services for minority audiences. We support the concept of guaranteeing access to BBC services but the Strategy appears to have underestimated the challenges involved in bridging the digital divide and the cost and complexity for consumers of switching to digital across many platforms.

VLV welcomes the many fine sentiments about the future direction of the BBC outlined in the strategy. This is a radical change from the ethos of the last few years in many parts of the organisation. We support this change in direction and welcome the re-statement of values included in the proposals.

However we have grave concerns about the ability of the organisation to adjust to the new standards. Over the last few years the management of the BBC has been such that these values have been eroded in many parts of the BBC. In order to ensure that the strategy is implemented, therefore, it is essential that a rigorous management plan is adhered to. We consider this to be the only way to ensure the objectives of the strategy are achieved.

## 1. PUTTING QUALITY FIRST

With some caveats we welcome this principle. It is enshrined in the Agreement with the BBC as part of the 2006 Charter. In defining the characteristics of public service content clause 14 states:

*“(1) The content of the UK Public Services taken as a whole must be high quality, challenging, original, innovative and engaging.*

*(2) Every programme included in the UK Public Broadcasting Services must exhibit at least one of those characteristics. ....”*

These five characteristics are incorporated into the aims and objectives of the service licences issued by the BBC Trust to each BBC service. In general we welcome the decision that quality should be the first of these characteristics. However, this must not reduce the innovative, engaging and original components contained in most programmes.

This priority meets some of the concerns raised in our submission to the 2009 consultation on core BBC television channels. We were concerned that the BBC was chasing high ratings at the expense of quality; that the challenging genres of contemporary and classical drama and documentaries were giving way to the softer options of “make over” and “reality” shows.

We quote from our submission: *“VLV considers the BBC to be the best guarantor of high quality public service broadcasting in the UK. Not only does it make good programmes, it sets a quality standard to which commercial broadcasters aspire ..... It is important that the BBC upholds high standards in the new digital world.”* (Response on core BBC TV channels December 2009)

## FIVE EDITORIAL CONTENT PRIORITIES

More detail is provided about how the BBC will put quality first in five editorial priorities. We make comments on each of these priorities.

### **(a)The best journalism in the world**

In our response to the 2009 consultation on the core television channels we criticised some aspects of BBC news output. We are concerned that sensationalism and a populist agenda set by other media have sometimes been followed by the BBC, resulting in weakened news output. There is also evidence that news analysis is being replaced by the less demanding, and less helpful activity, of speculation. The six pm television news is one example. A non populist approach may result in some of the news services provided by the BBC seeming less exciting than the more personalised, sensational services offered by some commercial organisations. The BBC should be about the provision of trusted information

However in this climate we wonder how the BBC can claim its journalism will be the best in the world. We welcome the commitment to strengthen international newsgathering; in particular proposals to strengthen and extend international reporting, for example, in areas such as China and Brazil. We are concerned that, apart from coverage of the USA, there is generally inadequate reporting from Europe and the rest of the world. Other European broadcasters have a more positive and imaginative approach to covering their common interests. For them language is no longer a problem as simultaneous translation or subtitles are used as a matter of course. A reluctance by the BBC to use these techniques means that viewers and listeners are often deprived of extended interviews and debate with those who are making a major contribution to the world around them.

## **(b) Inspiring knowledge, music and culture**

The BBC has to take the lead in these areas. It should aim to bring people into contact with the best of every genre. In the previous section we indicate that journalism must be of the highest standard. In the arts the BBC must undertake a similar role. Providing people with new experiences and the opportunity to experience all the arts is central to public service broadcasting. When they write their autobiographies, people in all sectors of public life testify to the central importance of BBC broadcasts in introducing them to UK and world culture. This testimony demonstrates how people can learn to acquire a taste for the best through having the opportunity to experience the best. We are disappointed that the broadcasting of a wider range of music genres on television is not given more consideration in the strategy. This is of particular concern in the key PSB area of classical music. In our comment on BBC2 in our submission to the 2009 consultation on the core BBC television channels we welcomed the greater coverage of Promenade Concerts on BBC 4. However we commented that this “*only goes a small part of the way to ... bringing classical and contemporary works to a broad audience.*”

We welcome the recent announcement of more opera coverage on BBC Television. Radio 3 in particular provides professional and comprehensive coverage of the cultural life of this country and elsewhere. Radio 3 and 4 often set a standard in their range of drama and music that television should follow.

## **(c) Ambitious UK drama and comedy**

We are disappointed that this priority is not sufficiently adventurous in its ambition for television drama and comedy. There is no real commitment to using any of the television channels to bring the work of the post 1950s generations of dramatists and other writers to television audiences. Equally there should also be a commitment to the broadcasting of plays from the rich heritage of drama in the United Kingdom and the world from classical times to the 20<sup>th</sup> century. It is rare to see the work of Ibsen, Chekhov, Shakespeare, or Shaw. These writers should not be the preserve of those able to visit the live theatre. The West End and the provincial theatres often have revivals of the great plays. The BBC should take account of the increasing use of high definition relays in selected cinemas across the world for opera and recently also for drama. This development should be extended to television and could be used to develop new partnerships with cultural organisations

## **(d) Outstanding children's content**

VLV welcomes the inclusion of outstanding children's content within the five editorial priorities. However, we feel that the philosophy of 'doing fewer things better', should not be used to justify longer running series at the expense of shorter run material. This is particularly noticeable currently in drama series for older children, where most of the productions are in this area (*Tracy Beaker, The Sarah Jane Adventures, MI High*), resulting in a lack of shorter, self-contained dramas, and book adaptations.

We disagree with the approach to the television provision for younger teens summarised on page 55 as follows “*Recognising the lead role that Channel 4 and other broadcasters can play in addressing the gap in public service television for younger teenagers, through the closure of targeted teen propositions.*” It is regrettable, particularly in view of the projected closure of BBC Switch, that the children's output so resolutely excludes material aimed at younger teens. We realise that no place in the schedule seems perfect for this age-group, but in the past the children's schedules have successfully included such programmes as the BBC's *Byker Grove* and ITV's *Press Gang*.

At point 5 below we comment on the abandonment of entire age groups and genres so that the BBC does not compete with the commercial sector. This looks like a lost opportunity and an abrogation of public service obligations, particularly in the light of the findings of Ofcom's 2007 report, which stated that original UK programming for older children was particularly at risk. We consider that there is a strong risk that there will be no provision in the long term for younger teens if only one channel makes provision. This is particularly so if the provision is left to Channel 4 as there is no guarantee that they will have the funding to make these programmes if budgets are cut. If substantial resources can be found to cater to young adults, through BBC 3, it seems odd and inconsistent for a public service broadcaster to virtually abandon the young teens.

We also disagree with the contention that 'children are treated to the best from *outside the UK* by providers such as Disney and Nickelodeon' (page 29,) These channels do provide many good programmes from North America, but none to speak of from the UK, Europe and the rest of the world. The BBC should look to include more programmes from Europe, such as the excellent *Lazy Town*, in its output. Children have a right to watch programmes which are made to reflect their own culture, language, literature and wider environment as well as these imported programmes from North America.

If the BBC is reprioritising nearly £600m a year (page 4) to higher quality content, it is very disappointing that only £10m of this (page 30) – less than 2% - is allocated to children's as one of the five areas of content priority. Children should be the top priority. If children watch and listen throughout childhood and adolescence they will retain the habit of using quality broadcasting into adult life. However there must be appropriate quality programmes that will attract young people at each stage or they will turn to other media for information and entertainment.

### **(e) Events that bring communities and the nation together**

VLV fully supports this as a key editorial priority. During the last year we have responded to DCMS consultations about events which are considered to be of major importance to society and therefore should be made available on free-to-air television to as many of the population as possible. There are events in the life of a nation that many citizens and consumers want to enjoy as they happen. There is concern that terrestrial broadcasters may not have the resources to cover all these events, especially sports. If the BBC gives events that bring communities and the nation together a high priority then all members of society can be involved especially those isolated by income, age, infirmity or geographical location.

## **2. DOING FEWER THINGS AND DOING THEM BETTER**

We are particularly concerned about this short but far reaching section of the Strategy Review. Much of the policy is elaborated in the much longer *Setting New Boundaries* section of the strategy. There is a dilemma in that the BBC often leads the way in new developments but must also take care it does not jeopardise the growth of the commercial sector.

The BBC has been a leader in much broadcasting technical innovation in the last 80 years and is tasked by the government to drive changes. This is particularly true of the first decade of this century when the BBC ensured that the advantages of digital television were available to all, rather than those who could afford a subscription. It is the leader in digital radio broadcasting and the BBC website is among the most popular in the UK.

We are therefore perplexed that in seeking to do fewer things the Executive has chosen two areas where the BBC has been most innovative and led the way: specialist digital radio stations and online. We are not aware that any commercial media organisation is able to provide the content which the BBC intends to cut.

If it is right for the BBC to do fewer things, and we are not convinced about this element of the strategy, then we consider that the Executive should have looked first to non-programme areas and then perhaps to individual programme areas before considering whole services.

### **(a) Digital Radio**

We note the statements on pages 43 and 44 “*should evaluate the best use of this content investment and of the digital spectrum that the closure of 6 Music would release*” and with reference to the Asian Network “*redirecting freed resources to serve Asian audiences better in other ways*” We are concerned not only that it is proposed to close two digital radio stations but that there is no commitment to provide replacement stations.

#### **(i) The Asian Network**

VLV has always endorsed the long established commitment by the BBC to serve minorities as well as majorities. We are therefore concerned at the prospect of losing the Asian Network. When BBC Local Radio began its services to Asian and other minority communities the demand grew for a service which would occupy greater lengths of time. It was clear that this could only be provided by a new network on its own dedicated frequency.

We share the concern about the falling audience for the Asian network and recognise that this station has to serve a diverse community. However, we question if closure is the right approach. It is not clear how the part time local services supplemented by some syndicated national output will work. It does not seem to take into account the major changes in local and community radio that are proposed in the digital radio upgrade. If it is intended to include distinctive “Asian” content on BBC local radio this will involve cuts in other local output. If “Asian” programmes are transferred to local radio other audiences will be displaced. While we agree that much of the audience for the Asian Network is based in a few large urban conurbations, it is also true that sections of the Asian community can be found across the whole of the UK. If broadcasts to this group become regional or local, many listeners outside these limited areas will be deprived of broadcasts currently available to them in contravention to the BBC’s commitment to providing a universal service for all.

#### **(ii) Radio 6 Music**

BBC 6 Music is a good example of public service broadcasting done well. It could be what the BBC should be doing if it wishes to do ‘fewer things, but better’. To close 6 Music would be to lose a cultural cauldron that has not been seen before. 6 Music traverses boundaries in British social life of class, gender, race and age. The audience is comprised of music aficionados, casual listeners, as well as artists themselves, clouding the distinction between artist and audience. Via the internet the service reaches many listeners abroad. It provides a platform for emerging independent artists and independent labels, as well as for those on major labels. The presenters are well respected and have an authoritative understanding of the music; it informs, educates and entertains. 6 Music therefore provides a productive, national and trans-national space that combines the best of broadcasting with the freshness of the spaces created through new media technologies. These reasons alone make it an exemplary public service station.

BBC 6 Music has considerable potential to increase its audience beyond the core who have access to digital radio and the internet. There is a considerable potential audience in those who feel unchallenged by Radio 1 and much commercial radio. The argument put forward that it has a small audience does not consider this potential. The publicity that potential closure has given to the service has resulted in a dramatic increase in listeners which confirms our view that with proper exposure and better promotion this station would prosper.

We also consider that 6 Music is an example of a digital service that could help to make the digital switch-over process more successful by encouraging people to switch in order to listen to this type of station. There is anecdotal evidence that listeners are buying digital sets specifically in order to listen to 6 Music.

It is apparent from the numerous websites and new media campaigns aimed at 'Saving 6 Music' that there is considerable concern from listeners about the proposed plans. BBC 6 Music has the potential to turn people onto radio, and to support the planned digital switch over, as the service it delivers is an unmatched exemplar of quality Public Service Broadcasting. Specifically it provides content and production values that are not found on any other BBC or commercial station.

### **(b) BBC online activities**

The budget cuts in this relatively new platform are the most difficult to understand. We do agree that there is a need to review all the websites to ensure that they meet the five content priorities. There is output on all BBC platforms that is not up to standard or no longer relevant and the controllers of television and radio make continual adjustments by removing or revising content as needed. Therefore there is a need to continually review the content of the BBC online services however this is a fast developing platform and there should not be major budget cuts.

More than on any other platform, we consider it is essential that the BBC, a trusted brand, has a major presence on the Web. As in broadcasting, the internet needs a provider which is independent and driven by the principles of public service broadcasting. It should be an essential part of the role of the BBC, in association with other public information services, to set a standard for impartiality, reliability and quality in all its online services.

### **3. GUARANTEEING ACCESS TO BBC SERVICES**

We are in agreement with the general thrust of this section of the strategy. *“Most of the broadcast content and online material provided by the BBC is unique in that it is paid for by the annual licence fee.... This gives the licence fee payers a special relationship to the material and a unique “ownership”. We consider this gives certain rights to the access and use of the content.”* (VLV response to introduction of iPlayer March 2007)

VLV has supported all the major developments by the BBC to expand onto other platforms and make the programmes available as widely as possible.

- *“VLV welcomed the major presence on the World Wide Web for the BBC represented by the establishment of bbc.co.uk. It has set a standard for quality and diversity on the web... [It] has done a huge amount to promote and build confidence in the general use of the Web and Internet services.”* (December 2007)

- We supported the establishment of Freesat as a solution to reception problems and noted it provided “*the availability of an alternative satellite from a trusted “brand” [to] encourage a switch to digital thus improving access to the new technology.*” (March 2007)
- We supported the introduction of the iPlayer at all stages of its development for both radio and television programmes.

However, there is a more extensive and strategic issue that the Strategy Review has failed to address - the feasibility, practicability and cost to listeners and viewers of receiving the BBC's programmes. Listeners and viewers have always had to buy their own radio or television sets, but the BBC now requires listeners and viewers to buy an increasing number of items of reception equipment if they are to enjoy all the BBC's services.

The BBC is increasingly diversifying into online and on-demand services, which listeners and viewers can usually only access by means of a broadband service. We have concerns about the dash to digital delivery via broadband.

- It will take a long time for the UK to achieve an adequate universal broadband network, and until that happens, those licence payers who cannot access broadband will be unable to receive the BBC's online services.
- Many of the current broadband services have insufficient capacity to deliver television signals to consumers in a smooth and unproblematic manner.
- There is still a major digital divide in the UK with only 70% of the population having access to the internet. We applaud the work done by the BBC to encourage the use of the internet and other new technologies over the last decade. However it is essential that the key BBC output on television and radio is always available as a free to air and without-subscription service on standard radio and TV receivers. [consider putting this last statement in bold]

We welcome involvement of the BBC in Operation Canvas. However this technology is still in its infancy so we are alarmed by the statement in the Strategy summary *As the internet comes to the living room through television sets, it will become more important still—and indeed, one day, may be the only platform and delivery system that the BBC needs to fulfil its public purposes.*(page 9). This statement totally ignores the portability and versatility of radio as a platform as well as the additional cost involved in broadband subscription – a cost that is often roughly equal to the cost of the Licence Fee.

The BBC is in danger of abandoning its traditional commitment to providing licence payers with a universal service, and of replacing it by producing programmes which, although made available on a number of platforms, also require the listener or viewer to commit to unfamiliar technology and pay an additional fee to a telecommunications or a cable company in order to be able to access them.

The BBC has a central role in providing education about all aspects of new media and about new technology. However the licence fee must not be diverted from funding PSB programmes. The BBC Trust should resist any further “top slicing” of the income for non-broadcasting purposes such as bridging the digital divide and the roll out of broadband.

## The BBC Archive

We welcome the development in this area of the BBC's commitment to universal access to content. We recognise that some of the archive could be exploited commercially and the profit used to fund new programmes. We hope that the Trust will seek more clarity on which content will remain in the 'permanent collection' for free, and which will be paid for.

### 4. MAKING THE LICENCE FEE WORK HARDER

VLV has been very critical of the high salary and bonus culture of the middle and senior management levels at the Corporation. We welcome the new commitment to curb these areas of expenditure and especially to reducing the number of layers of management. It is essential that at a time of major cuts in other public services that the expenditure of the BBC is not excessive or profligate.

However, at the level of programme making, much of the activity depends on the work of highly skilled staff across a wide range of disciplines. We consider that the cuts of recent years have already had an impact on programme quality, especially in radio, where programme budgets and teams are small. We welcome the recognition of this on page 50 "*future content efficiencies will be targeted carefully: after more than two decades of year-on-year efficiencies, some programme budgets cannot be reduced further without damaging quality.*" We would suggest that most programme budgets cannot be reduced further. The licence fee could be made to work harder, not by cutting programme budgets, but by slimmed down management structures and perks.

There is also a need for the BBC to manage its property portfolio more effectively. A recent example is the move of radio news and current affairs to Television Centre followed by a return to Broadcasting House some years later. We also remain concerned at the lack of enthusiasm among many staff for the move to Salford with the consequent loss of talent.

### 5. SETTING NEW BOUNDARIES FOR THE BBC

We are concerned that the BBC seems content to abandon entire age groups and genres so that they do not compete with the commercial sector. Even though we accept the force of the argument that the BBC must take care that it does not dominate the market, especially where the commercial sector is able to make a significant contribution. Commercial broadcasters and other media organisations need, despite often high ideals, to make a profit for their shareholders. In difficult economic times therefore they drop expensive programmes or those with niche audiences. ITV has dropped its flagship *South Bank Show*, and wants to cease or cut regional news broadcasts. Over the years it has also dropped at least two regionally produced network documentary series - *World in Action* and *First Tuesday*. If the BBC had also decided that it did not have a role in cultural documentaries or in regional news as provided by ITV there might now be no programmes in these essential areas of public service broadcasting.

As a citizen and consumer organisation, VLV has more experience of the impact that programmes and services have than about the detail of costs and budgets devoted to different activities but we are concerned at the introduction of the concept of caps on specific genres. We fear this might lead to all genres being allocated a proportion of the budget but are not convinced that such a one-size-fits-all policy would be the best way forward in a rapidly changing media.

In the case of sport the list of free-to-air events is being reviewed. The BBC should be prudent in all areas of expenditure and not fuel the current inflation in rights costs. The BBC has a responsibility with other PSBs, however, to ensure that the many citizens and consumers, who want to enjoy major sporting events as they happen, are able to do so free at point of use. This is especially important for those isolated by income, age, infirmity or geographical location. The BBC needs adequate resources if it is to play a full part here.

## **BBC BEHAVIOURS**

We welcome the listing of behaviour for the BBC. The majority of these attributes however are what we would expect any national public organisation to aspire to. They are also a restatement of the underlying principles of the 2006 Charter and Agreement. It seems a sad comment on recent years, therefore, that this strategy document has had to re-iterate and include this reminder of core Public Service Broadcasting behaviour and values.

## **6. AREAS OF BBC ACTIVITY THAT ARE MISSING FROM THE STRATEGY**

VLV is concerned that some areas of BBC activity are not mentioned in the Strategy. The following have been very important in the past not only for the BBC but to broadcasting and in some cases the UK in general.

### **(a) Education**

Since the founding of the Corporation the BBC has had an informal role in education that has been referred to above but it has also played a part in more formal learning. This is not only for children but also to assist the life long learning of adults. There is no mention in the strategy document about education or the future of BBC learning. There is more to adult learning than cookery and gardening. We hope that education, a central Reithian, principal will remain central to the future BBC services.

BBC Jam was an imaginative project and we wonder why the earlier decision by the Trust to abandon it for legal reasons has not been re-visited. VLV saw early examples of BBC Jam in the classroom and we were very impressed, particularly the contribution to the education of young people with special needs.

### **(b) Training**

The BBC has always taken the lead in training for all aspects of the broadcasting industry and set up the School of Journalism. The BBC has trained many who have then moved to work in other parts of the industry. This has been a valuable resource for many broadcasters. Training may seem a luxury at a time when budgets are under pressure but we consider it is essential if the aim of putting quality first is to be achieved.

### **(c) Research and Development**

Research and Development in broadcasting is not an activity limited to the BBC but they have often initiated or led the way in important developments such as VHF radio, colour television, terrestrial digital television and digital radio. There is often no immediate profit from these developments but they have often changed broadcasting both permanently and for the better while in the long term helped UK manufacturers.

#### **(d) Technical quality of broadcasts**

Putting quality first must extend to the technical standard of the programmes. We consider that we have seen a fall in the technical standards of many programmes. Two examples are; the quality and fluctuation of sound levels during both in television and radio programmes and the variety and quality of lighting in many television programmes. Poor technical standards can spoil a programme no matter how high the rest of the quality is.

**Monday 24 May 2010**