

*Championing
excellence and diversity
in broadcasting*

Founded in 1983 by Jocelyn Hay CBE



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**RESPONSE OF THE VOICE OF THE LISTENER & VIEWER TO
OFCOM'S CONSULTATION ON ITS PROPOSED
ANNUAL PLAN FOR 2021-22**

5 February 2021

1. **About VLV**

The Voice of the Listener & Viewer (VLV) is an independent, not for profit membership-based charity, free from political and sectarian affiliations. VLV supports high quality broadcasting which maintains the democratic and cultural traditions of the UK. We support the independence and integrity of the BBC and encourage work which demonstrates commitment to the principles of public service broadcasting (PSB). VLV is a charitable company limited by guarantee (registered in England and Wales No 4407712 - Charity No 1152136).

2. VLV welcomes this opportunity to respond to the Ofcom annual plan for 2021/22. In particular we welcome Ofcom's commitment to a strategic priority to develop and support UK Public Service Broadcasting (PSB).
3. The VLV is committed to securing a healthy future for PSB and strives to ensure PSB continues to benefit citizens across the UK and to maintain its important role in the communications market. We value in particular the wide range of content freely available to viewers and listeners through Digital Terrestrial Television (DTT), Digital Audio Broadcasting (DAB) and analogue transmissions of radio services.
4. We are aware of Ofcom's currently open PSB Review consultation to which we shall respond separately.
5. VLV's primary concern is that public service television and radio services should be universally available across the UK free at the point of reception. Viewers and listeners should not be obliged to pay additional fees to access PSB content. The role of the 600MHz band, which currently supports independent delivery of the Freeview services, is a vital part of PSB itself and needs to be protected.
6. We note and welcome that Ofcom has recognised the important role that PSB has played during the COVID pandemic, by adapting to the needs of citizens and providing vital news and information that has been edited and fact-checked. This has been vital when other media, especially social media platforms, have allowed and even promoted misleading and sometimes harmful information.
7. We broadly support Ofcom's goals as set out in the Annual Plan. These emphasise the objective of providing for the needs of citizens, recognising that those needs are not uniform across the market and across demographics. Nationhood, citizenship and social cohesion must not be sacrificed to the commercial needs of industry and commerce without a due balancing of stakeholder interests and without regular consultation with citizens, including minority groups such as the elderly and disabled to whom advancing technologies are sometimes confusing and challenging.
8. We note the particular references made to the regulation of the BBC and also the matters of the renegotiation of its funding and preparations for the BBC Mid-term Review. We shall follow these issues with keen interest as they

arise. We agree that the BBC should be accountable and subject to public scrutiny and that it should adapt to ensure that it meets public needs.

9. However, the BBC must remain independent and its mission should not be subverted due to a lack of funding. We are concerned that it should not be unduly dependent on commercial income, because this might undermine its focus on providing public service content for UK audiences and erode the delivery of its mission which is to provide PSB. We are also concerned that the BBC should remain the flagship of PSB and not be reduced in scale or scope due to a lack of funding. To achieve a suitable balance between the need to supplement public funding through commercial activities and deliver its core mission requires a strong understanding between Ofcom and the BBC Executive. While audience satisfaction and measuring success through viewing figures are important metrics, these should not be the dominant measures of success; a key goal of the BBC, and of PSB more broadly, is to innovate and ensure that citizens are encouraged to extend their views and experiences through broadcasting.
10. We note the continued rapid rise in mobile data consumption and the considerable emphasis in this Plan on securing yet more spectrum to support these services. It is noted that several frequency bands in high GHz ranges have already been identified as suitable for mobile data and an auction is planned in early 2021. There are future targets in the high GHz range which may be used in due course. We note that a separate consultation has been issued for Ofcom's spectrum strategy to which we shall respond separately.