



## **Communications Commission**

*Oaseirys Çhellinsh*

## **Response to the BBC Trust's Strategy Review Consultation**

**17 May 2010**

## **1. Introduction**

- 1.1. The Communications Commission is a Statutory Board of the Isle of Man Government and has responsibility for the licensing and regulation of telecommunications and broadcasting on the Isle of Man.
- 1.2. Under the Broadcasting Act 1993 (Amended 2007) of Tynwald, the Commission licenses and regulates programme services provided from places in the Isle of Man. The Commission also keeps under review the reception, quality and content in the Isle of Man of programme services provided from places in the Island or elsewhere.
- 1.3. Together with these statutory duties, the Commission has responsibility for furthering the interests of the Isle of Man in the whole area of broadcasting and welcomes the opportunity to respond to the BBC Trust's Strategy Review Consultation.

## **2. Our Response**

- 2.1 Overall, the Commission welcomes and supports the strategic vision put forward by the BBC Director General.
- 2.2 There are elements within the five proposals for achieving this vision which the Commission wishes to comment on in turn.

### **Putting Quality First**

- 2.3 Reprioritising funding to higher quality content appears to be a winning situation for TV licence fee payers and the Commission would of course welcome this.
- 2.4 We note that the BBC intends to invest in new original British content to replace the programmes and films acquired from abroad. We would take this opportunity to encourage the BBC to produce both more Isle of Man based content and to take advantage of the Island as an excellent location to film and produce original content. Isle of Man Film (wholly owned by the Isle of Man Government) acts as an equity investor in film and television, in partnership with the local treasury and investment partners CinemaNX. Films made on The Isle of Man have ranged from *Treasure Island* to *Waking Ned*, and more recently *Me and Orson Welles* and *The Disappearance of Alice Creed*.
- 2.5 The Review also speaks of the BBC's ambition to cover a broad range of sporting events free-to-air that deliver significant value to licence fee payers. With this in mind, we would encourage the BBC to consider further coverage of our TT Races, or the upcoming Commonwealth Youth Games, which are to be hosted by the Isle of Man in September 2011.
- 2.6 The Commission notes that in striving to produce the best journalism in the world, the BBC is committed to scrutinising the local democratic process through multiplatform coverage. We would welcome BBC's consideration to increasing coverage of the political affairs unique to the Isle of Man. This may include the possibility of specialised coverage of our parliament, Tynwald, via traditional or new media channels.

### **Doing Fewer Things Better**

- 2.7 The proposals in the BBC's proposed Strategy Review recommend the closure of Radio 6 Music in order to focus popular music output on other stations and that by doing so

resources would be released to “drive digital radio in other ways”. We would be interested to learn more about these plans, as there are feelings of disparity on Island when it comes to DAB coverage as existing coverage falls well short of 90%.

- 2.8 We would also be interested to understand what would be involved in the proposed “contracts for local” services and whether such a contract may be beneficial between the BBC and the Isle of Man to define exactly what Island residents can expect from the BBC.
- 2.9 In the Review document, the BBC has pledged to remain fully committed to supporting the UK’s indigenous minority languages through BBC Alba and a renewed strategic partnership with S4C. While the Commission welcomes the ongoing work that the BBC are doing to translate sections of the BBC Isle of Man website to Manx Gaelic, we would encourage the BBC to engage with the Island’s indigenous language, associated history and culture to produce programmes in a similar vein to BBC Alba and S4C.

### **Guaranteeing Access**

- 2.10 Public service is all about ensuring that everyone has equal access to the same services at the same cost. In this regard, we appreciate the BBC’s commitment to ensure that TV Licence fee payers will continue to receive BBC services for “*free at the point of use, in ways and on devices that suit them*”.
- 2.11 However, mentioned in the Review is that some services and platforms are still not accessible across all parts of the UK. We note the BBC’s intention to increase the coverage of these platforms, but specific platforms do not appear to be mentioned. The Commission would like to see the BBC’s early commitment to extend DAB coverage on-Island.

### **Making the Licence Fee Work Harder**

- 2.12 While, in general some residents will be happy with the service they receive from the BBC, the Licence Fee is an area of contention for many on the Isle of Man.
- 2.13 The Fee’s perceived value for money has been the subject of ongoing debate for many years. Indeed, a Select Committee comprised of three Tynwald members was set up in November 2009 to investigate the “*feasibility and impact of withdrawal from or amendment of the agreement under which residents of the Isle of Man pay a television licence fee*”. Both the BBC and the Commission were invited to submit evidence to the Committee which, at the time of writing, has not reported its findings. Concerns have been expressed that the Island fairs less well than other parts of the British Isles and particularly when compared with the Channel Islands who have two BBC radio stations and a dedicated local opt-out in BBC’s regional news coverage.
- 2.14 In the Review, it is proposed that the BBC will ensure that for every pound spent on the Licence fee, the UK economy will benefit by at least £2 and that this value will be spread across the whole of the UK. While this is probably an unfortunate choice of words, the Commission would naturally expect that any extra value created by more focused BBC spending would lead to equivalent benefits for the Isle of Man, which is referred to as part of the UK for the purposes of the BBC Charter and Licence fee agreement.

## **Setting New Boundaries**

- 2.15 It would appear that the BBC is looking to limit the number and reach of some services, which could result in a reduced number of local BBC services on television, radio and online. While this may be appropriate elsewhere, the Commission would hope that the current relationship with the Island and Manx Radio would remain, and that recent efforts to include the Isle of Man in more of the BBC's television, radio and online content would continue.
- 2.16 We do, however, see the BBC's intention to focus more on developing partnerships as the 'default setting' as positive and hope that this leads to an exploration of areas where the current relationships with the Island and can be improved. Indeed, it would also be beneficial to investigate whether potential partnerships with the other Isle of Man licensed radio stations, local media, independent producers and film industry can be achieved.

## **3. Local Radio**

- 3.1 This is an area which the Commission would like to comment in particular. We note the Trust is inviting views on what the right balance should be for local services between meeting audience expectations of BBC local content and leaving space for commercial providers.
- 3.2 On the Isle of Man, there has never been a BBC local radio station. Manx Radio predates BBC Local Radio in the UK and acts as the Island's public service broadcaster. Two other fully commercial radio stations, Three FM and Energy FM, also provide local content.
- 3.3 The current memorandum of understanding between the BBC and Manx Radio for content and resource sharing has been successful to date. However, the Commission would reiterate its desire for the development of this agreement and any potential expansion with the other local, commercial radio stations on Island.
- 3.4 Although there is no BBC local radio on the Island, residents pay the same Licence Fee as others in the UK and Channel Islands where BBC local radio services are available. Because a proportion of every fee is allocated to local radio, there is a case that Isle of Man residents do not receive the same value for money as other licence fee payers do. The Commission would therefore welcome commitment from the BBC could provide to address this issue.

## **4. Trust's Review of Nations and Regions Radio Services**

- 4.1 On the subject of the forthcoming Trust review of Nations and Regions radio services which the Trust are inviting comments on, we believe that it would be beneficial to produce Review documents for each nation, including separate documents for the Isle of Man and Channel Islands. This would clearly distinguish the BBC's commitments in each nation and region.
- 4.2 This idea could also be adopted in the current Strategic Review, either in the form of separate documents or differentiated sections of the same report. These sections could concentrate on the BBC's precise strategy for the Isle of Man and Channel Isles. From an Isle of Man point of view, this may increase the perceived transparency and accountability of the BBC's service to the Island. The Island's absence from previous reviews has been noted.

**Dr Carmel McLaughlin**  
**Director, Communications Commission**  
17 May 2010

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What do you want the BBC Trust to keep confidential?

Nothing	√
Whole Response	
Part (please state which part)	

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Name

Signed (if hard copy)

**Dr Carmel McLaughlin**