



Department for
Digital, Culture
Media & Sport

Public Service Broadcasting Contestable Fund: Government Response

30 December 2017

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1. Overview

This document is the government's initial response to the consultation paper *Public Service Broadcasting Contestable Fund Consultation* published by the Department for Digital, Culture, Media and Sport.

It covers:

- The background to the contestable fund
- A summary of the responses received, and more detailed analysis of the responses to each question
- A summary of the next steps following this consultation

The consultation launched on 20 December 2016 and ran for eight weeks, closing on 14 February 2017. We sought views and evidence through nine questions relating to:

- The focus of the fund
- Distribution platforms
- Pilot administration
- Evaluation criteria

We received 55 responses in total. A full list of respondents can be found in Annex A. We are grateful for all of the responses provided by the individuals and stakeholders who engaged with this consultation.

If you have any further comments about the consultation process or this response, please write to:

FAO PSB Contestable Fund Consultation
Media Team
Department for Digital, Culture, Media and Sport
4th Floor, 100 Parliament Street
London
SW1A 2BQ

Or email: contestablefund@culture.gov.uk

2. Executive summary

2.1. Background

Public service broadcasting and the under-provision of PSB content

Public service broadcasting (PSB) brings significant benefits to society. Providing a variety of programmes aimed at different audiences, PSB has a high level of reach across all ages and parts of society, and viewers highly value¹ the content provided by public service channels.²

The amount spent by PSBs on new programming has fallen in real terms over the past decade. There are a number of reasons for the under-provision of particular PSB genres, including:

- There is a wide disparity in the profitability and commercial attractiveness of different genres. Some genres, such as arts and religious programming, do not attract as large an audience compared to other genres and therefore attract less advertising revenue;
- It is increasingly common for producers to want to recoup investment through the sale or licensing of programme rights with international appeal. This is more feasible in some genres than others;
- For children's programming, there are a number of advertising restrictions which limits the ability to generate advertising revenue.

The consultation also noted that radio is also an area where provision of public service content could be strengthened. The provision of certain specific genres of public value radio content is often perceived to have low commercial attractiveness and is therefore mainly provided across the BBC stations. Engagement with commercial radio sector stakeholders suggested an appetite to provide more public service content.

The contestable fund

In the white paper, *A BBC for the future: a broadcaster of distinction* (2016), the government committed to establish a pilot for a new contestable fund. Following further development of the fund over the coming months, an approved business case

¹ https://www.ofcom.org.uk/_data/assets/pdf_file/0019/103924/psb-annual-report-2017.pdf, pg. 3

² The designated public service channels are: the BBC (all channels), the holders of the channel 3 licences (ITV, STV and UTV), Channel 4, Channel 5 and S4C.

and the publication of a detailed policy paper in the new year, we intend that the fund will make its first awards in 2019/20, and that it will distribute up to £60m over a three year pilot period. The funding for the pilot was made available as a result of unspent funds from the previous licence fee settlement, originally intended for the purpose of broadband roll-out. As set out in the white paper, these funds will be made available to organisations to create PSB content to be shown to the UK population on platforms that have an appropriate reach and are free at the point of use.

A contestable fund, using competitive forces to ensure the highest quality and the best value for money, would help to stimulate the provision and plurality of public service content in targeted areas. The fund would create an additional point of funding for original UK PSB originations, helping to bring plurality to the market for content where the BBC is often the dominant buyer and broadcaster. It would create new avenues for creators of original content, and in doing so strengthen the broadcasting system's ability to inform our understanding of the world; to stimulate knowledge and learning; to reflect the UK's cultural identity; and to represent diversity and alternative viewpoints - key PSB purposes, as defined by Ofcom.³

Towards the end of the pilot the impact of the scheme will be assessed and a decision taken about whether to close, maintain or expand it.

2.2. Summary of responses received

The government launched a consultation on 20 December 2016 which ran for eight weeks, closing on the 14 February 2017. The consultation sought views from broadcasters, producers, viewers and others on how the fund should operate and how it could best strengthen the value for money provision and plurality of PSB content.

A total of 55 responses were received in response to the consultation paper.

Respondents - a full list of which can be found in Annex A - included:

- The PSBs and national and regional broadcasters
- Production groups and individual producers
- Radio groups and broadcasters
- Cultural organisations
- Audience groups
- Children-focused stakeholders
- Academics
- Members of the public

³https://www.ofcom.org.uk/_data/assets/pdf_file/0019/103924/psb-annual-report-2017.pdf

There was considerable support for the fund, with the vast majority of respondents engaging enthusiastically with the opportunities it could provide to strengthen the PSB system and serve UK audiences.

A small number of respondents raised concerns about the fund. Some highlighted a potential risk of the fund displacing private investment, while others emphasised that the fund would need to be carefully developed to work effectively with the existing PSB ecology. Concerns raised during the consultation process will be taken into full consideration as the fund is established.

A detailed overview of responses to the questions asked in the consultation can be found in section 3, but the main findings are as follows:

- **Q1: Focus of the fund.** A small majority of respondents were in favour of a narrowly focused fund, many of whom contended that a broader focus with more eligible genres would lead to reduced impact and higher administration costs. The consultation showed a spread of support across all of the suggested genres, with strongest support for children's content, followed by nations and regions, arts and classical music, and diversity content.
- **Q2: Extending the fund to radio.** Arguments were put either way on the inclusion of radio content. A considerable amount of support did not appear to have a strong opinion. Those that did have a strong view noted the positive impact the fund could have on radio given the lower production costs and shorter timeframes involved in production. On the other hand, some respondents argued that including radio content would increase administration costs and dilute the impact of the fund.
- **Q3: Distribution platforms.** A majority of responses supported a flexible approach in terms of funding content for on-demand platforms (that have an appropriate reach and are free-at-the-point-of-use) and online broadcast as well as linear TV, to maximise reach. However, some respondents suggested that content only available on online platforms may struggle to be discovered. There were also concerns raised about the suitability of some online platforms, and that online only content would not be held to Ofcom broadcast standards (e.g. regarding child protection).
- **Q4: Distribution criteria.** Most submissions argued that a guarantee for broadcast should be a condition for receiving funding, in order to support the pilot's impact and value for money. A small number of respondents argued that some funding should be made available for content and talent development without requiring a guarantee of broadcast.
- **Q5: Pilot administration model.** There was broad support for the administration model outlined in the consultation document. Very few

responses disagreed with the proposal, but a wide range of specific suggestions were made to build upon it.

- **Q6: Pilot administrator.** Slightly more respondents agreed than disagreed that the BFI is the best option to administer the scheme. Support for the BFI was based on its reach and experience, while concern related to its need to bring in specific broadcast and content expertise. No other third-party organisations indicated a desire to take responsibility for overall administration of the fund, while several respondents noted that setting up a new body would be highly costly and complex.
- **Q7: Funding conditions.** Responses were mixed as to whether the pilot should be able to recoup funds, given practicality, cost, the less-commercial nature of the content, and that it is a time-limited pilot. There was scepticism of matched funding requirements, and a common view was that agreements should be as flexible as possible.
- **Q8: Evaluation criteria.** There was widespread support for all of the proposed criteria for assessing bids, including innovation, additionality, nations and regions, and diversity. A limited number of submissions offered alternative suggestions for criteria that could be considered.
- **Q9: Additionality.** In considering how to assess this specific evaluation criterion, respondents provided a variety of suggestions, including: measuring against previous genre output; having specific expertise on the panel; or putting the onus on applicants to distinguish projects from others within the same genre.

2.3. Emerging views and next steps

We have taken into account the responses to the consultation in determining the way forward. We set out here our emerging views on the shape of the fund, ahead of further work with the provisional administrator over the coming months to inform a business case, before final decisions can be taken on the precise design and operation of the fund.

We will provisionally appoint the **BFI** as administrator for the pilot. We remain of the view set out in the consultation document that the BFI is best placed to undertake this task. We expect that the pilot will operate along the lines of the model outlined in the consultation document, but DCMS will work with the BFI to develop the detailed design of the fund over the coming months. A final decision on BFI as delivery partner will be taken following this work.

The inclusion of **radio** received support in the consultation, and could be an attractive prospect due to the low-cost public service programming that could be

produced. However, including radio could significantly increase the complexity and administrative cost of the scheme (given the need for additional expertise), and to include it in a BFI-administered scheme would require the BFI's Charter to be amended. We are therefore inclined not to include radio content as part of the TV contestable fund. Instead, the government will engage with the radio industry to explore whether there may be alternative options for using a small proportion of the funding marked for the contestable fund to support the radio sector in a more bespoke way.

In terms of **genres**, our current view is that the fund will focus on children's content, which remains an area of considerable concern and particular societal importance. This will complement wider industry efforts to combat the underprovision of children's content, including through Ofcom's new powers, given to it through the Digital Economy Act 2017, to introduce criteria for the provision of children's programming for commercial PSBs. However, the further work to be undertaken with the BFI will consider the potential to also include other genres - such as arts, music, religion, and diversity-specific content. In particular, we will look at the deliverability and cost implications of broadening the focus of the fund to these additional areas.

The government remains open to the distribution of content on a range of **platforms**, including on-demand platforms and online, should they have an appropriate reach and be free at the point of use. However, further work will be needed to consider whether content broadcast only online will be eligible, given concerns raised by consultation respondents about discoverability and lack of regulatory standards.

Given value for money considerations we believe that **funding distribution** should occur only once a bid has a guarantee for broadcast - although we also expect to allow awards to be made 'in principle', with bids receiving the funding if they subsequently receive a broadcast guarantee. However, we note arguments made by some respondents that funding should be given to support talent and intellectual property development, and this will be considered as the design of the pilot is developed.

In terms of **funding conditions**; to ensure that the scheme does not require an individual state aid approval from the European Commission, awards would need to be capped at 50% of production and distributions costs. We are currently not minded to seek to recoup funds, given the impact on administration costs, but will consider in our further work with the BFI.

We are also minded to maintain the position set out in the consultation document that bids will be assessed against (although will not necessarily have to meet) all of the six **evaluation criteria** suggested in the consultation document: quality,

innovation, additionality, nations and regions, diversity and new voices. Further work will be undertaken with the BFI to consider how best to design these criteria, in particular 'additionality' and whether indigenous regional language content could be considered eligible as part of the nations and regions criteria, and whether any other evaluation criteria proposed during the consultation period warrant inclusion. It is worth reiterating the fundamental aim of the fund to support the provision of content with a broad reach across the UK.

Next steps

The development work with the BFI will inform a business case for approval within government. Following this, we will publish a detailed policy statement setting out precisely how the fund will operate. This is likely to be in the first half of 2018.

The exact timetable of the fund is to be determined, but it is likely that the fund will be established by the end of 2018, with the first funds distributed at the beginning of the 2019/20 financial year. It will then run for three financial years - until the end of 2021/22 - by which time a decision will be taken on whether to close, maintain or expand the scheme.

3. Question analysis

The following section provides a summary of the responses received to each specific question. Not all responses answered every question in the consultation. Moreover, as responses often provided narrative answers or suggested support for multiple options, it is not possible to provide a detailed quantitative analysis.

FUND FOCUS

3.1. Question 1 - Focus of fund

(i) Should the fund be broadly or narrowly focused?

A small majority of responses supported a broad focus compared to those who favoured a narrow focus. A small number expressed no clear view.

The respondents who supported a broadly focused fund generally argued that the fund could work flexibly to support the best ideas in a number of under-served genres. However, responses that expressed support for a narrow focus had concerns that extending the scope of the fund could mean it is less able to make a meaningful, long-term difference to PSB, and that it would be more efficient to concentrate the money in a smaller number of areas. Some respondents also said that a narrower focus would reduce the cost and complexity of administration so that as much of the fund as possible could be used for projects rather than overhead costs.

(ii) On which genres and audiences should the fund be focused?

- a) Arts & classical music**
- b) Children's**
- c) Religion and ethics**
- d) Education**
- e) Factual**
- f) Nations and regions**
- g) Diversity (i.e. content for/about protected groups)**
- h) Other, please specify**

This question saw varying strength of support across each of the suggested genres. Many responses indicated support for more than one genre - indeed a sizeable proportion suggested all the listed genres - while numerous suggestions were made for additional genres that could be included within the fund's scope.

In terms of specific genres, the strongest support was for children's programming to be the focus of the fund. The thrust of these responses was that this genre warranted a particular emphasis because it suffers from the clearest market failure and has seen the biggest decrease in spend by PSB channels.

There was notable support for the genres of arts and classical music, nations and regions, and diversity. A number of respondents shared a view that nations and regions and diversity may be more appropriate as evaluation criteria for content that fits within other specific genres, rather than considered as standalone genres themselves. Support was most limited for factual content.

Around one in five responses offered alternative classifications that were not listed, such as:

- Micro-budget dramas
- Ring-fenced funding for low-budget programmes
- Music other than classical
- Minority sports
- Indigenous regional languages

3.2. Question 2 - Extending the fund to radio

(i) Should the fund extend to radio as well as TV?

Around one in five responses expressed no view on this question, while those that did respond often explicitly stated that they did not feel strongly. Overall, however, a significant majority of responses recommended that the fund should extend to include radio alongside television.

Responses that expressed support for radio to be included generally argued that radio productions offered potential to deliver value for money through lower production costs and quicker start up in comparison to TV. However, other respondents had concerns that the inclusion of radio would dilute the impact of the fund, and that extra cost would be involved in bringing in the required expertise to administer the fund. Others also contended that there was not a market failure case in radio content.

(ii) If so, how should the proportion of the fund available for radio content be capped?

- a) 5%
- b) 10%
- c) 15%

d) Other, please specify

Over a third of responses did not express a view on this question. Even more respondents suggested an alternative level and/or structure of cap to those listed - the majority of these supported no cap at all and for this to be flexible as necessary in order to support the best ideas regardless of broadcast medium. Of the three suggested levels, more respondents favoured 5% than did 10% and 15% combined.

DISTRIBUTION PLATFORMS

3.3. Question 3 - Distribution platforms

With regards to ensuring that content is free-to-access and made widely available, what platforms should be available to content funded by the contestable pot?

- a) Linear broadcast only**
- b) Linear and associated broadcaster on-demand platforms**
- c) Linear, on-demand platforms and other online platforms (such as YouTube)**

There was very limited support for funding content to be broadcast only on linear platforms. More than half of the respondents were in favour of funding content to be broadcast on linear, on-demand and other online platforms. There was a widely expressed view that there should be greater flexibility of platform distribution to increase reach and reflect changing viewing habits, particularly for younger audiences.

Some respondents had concerns about funding content available only on online platforms due to the risk that content would not be easily discoverable, thereby limiting reach and impact. These concerns were not so widely shared with regard to broadcasters' on-demand platforms, although in either case some suggested that a cross-platform marketing strategy should be required to support discoverability.

There were also concerns regarding the suitability of some online platforms relevant to children's content (were that to be preferred as a focus for the fund). Platforms such as YouTube are not regulated by Ofcom and therefore the fund administrator, rather than a broadcaster, would need to be responsible for ensuring content standards - leading to either risks of consumer harm or increased administrative costs for the fund.

A small number of responses were in favour of including content made for paid platforms in order to maximise the impact and reach of programmes, saying that, for

example, Netflix could part-fund projects in return for the first view on their platform and then it could be carried over by a free-to-access platform. A handful of responses also suggested that new forms of digital content should also be included, such as apps, games and podcasts.

3.4. Question 4 - Distribution criteria

Which of the following broadcasting/distribution criteria should be placed upon qualifying bids?

- a) Broadcaster/platform guarantee not required in bid**
- b) Broadcaster/platform guarantee required in bid**
- c) Award permitted “in principle” subject to broadcaster/platform guarantee within a particular timescale**

The bulk of respondents gave one of two answers: nearly a third of responses selected option b), that a broadcaster/platform guarantee should be required in bids; while a similar number of responses expressed support for option c), that awards could be permitted “in principle” subject to a broadcaster/platform guarantee within a particular timescale. These responses generally felt that a guarantee was important as it would act as a quality control for productions, and avoid the risk of wasting funding on a production which could not then be distributed and be seen (or heard) by the public.

Fewer than ten respondents thought that a guarantee should not be required. Some of these argued that supporting talent and intellectual property development was a sensible objective for at least part of the fund, and that a broadcast guarantee would limit opportunities to achieve this. Some respondents felt that a guarantee would result in broadcasters issuing restrictions on producers and would stifle development. Some respondents made alternative suggestions, although in practice these often simply reflected a flexible approach between each of the listed options.

PILOT ADMINISTRATION

3.5. Question 5 - Pilot administration model

(i) To what extent do you agree with the pilot administration model?

Approximately half of the responses agreed with the proposed pilot administration model and half of the responses did not have a firm view. Many of those who agreed with the model welcomed its light-touch approach, and in particular cited the importance of the fund not having an editorial function. Only a very small number of

responses disagreed with the proposed model, largely due to disagreeing with the concept of the fund itself.

(ii) If not what other options should be considered?

Despite there being broad support for the proposed model, at least half of respondents made additional suggestions about how the model could be changed or improved. Of these, a notable proportion recommended that fund awards should not be synchronised with broadcaster commissioning rounds - for some this was because they felt a broadcaster guarantee shouldn't be required, while others felt the fund should have greater flexibility to make awards throughout the year.

A common thread among responses was that while the proposed model appears effective, it must focus on minimising administrative burdens for those applying for awards. There was also significant support for the administrator recruiting appropriate expertise to allow it to administer awards effectively.

A number of respondents made suggestions with regard to overhead costs with suggestions of between 1-10% of the overall funding available. One response said that the costs should be independently audited to ensure that as much of the fund as possible is being used on funding projects rather than running costs.

3.6. Question 6 - The pilot administrator

To what extent do you agree that the BFI is a lead candidate to administer the fund?

Slightly more responses agreed than disagreed that the BFI is best placed to administer the fund, while a sizeable number - more than a third of responses - expressed no clear view.

Of those who supported the BFI as the lead candidate, there was a general consensus that the BFI has the appropriate reach and experience in order to administer the fund efficiently - for example, in running the BFI Film Fund which uses money from the National Lottery to support original UK filmmakers and films. It was also noted that the BFI's five year plan⁴ specifies a commitment to preserving Britain's most at-risk programming, including early children's television, potentially aligning with the broad aims of the contestable fund.

⁴ <http://www.bfi.org.uk/2022/>

Of those who disagreed, the most common concern was that the BFI lacked specific expertise in television, radio and digital; although others suggested BFI also lacked a strong presence in the nations and regions.

However, a number of suggestions were made that the BFI could recruit specialists in specific areas to provide additional expertise in order to make well-informed bid assessments. This expertise could relate to genre, broadcast medium or other specific criteria. This approach reflects suggestions made in the consultation document.

Several respondents recommended alternative bodies to administer the fund. However, while a small number of bodies offered to be delivery partners to work with the BFI, no bodies other than the BFI have expressed a desire to administer the whole scheme.

3.7. Question 7 - Funding conditions

Which of the following conditions do you think should be placed on successful funding awards:

- a) The fund should require matched funding from broadcaster/platform or other commercial partners**
- b) The fund should be able to recoup up to the amount granted to a successful programme**
- c) The fund should grant money by way of an equity investment**
- d) Other, please specify**

Nearly a third of the responses argued that the fund should work to recoup up to the amount granted to a successful programme. Other responses were mixed, with a relatively limited number in favour of the fund requiring matched funding or granting money by equity investment, and a significant proportion making a variety of new suggestions.

Of the responses that expressed support for fund recoupment, many said that this would be a logical step to ensure that the fund can continue for the future, but that it was crucial this did not act as a deterrent to applicants or unduly increase administrative complexity.

There were a small number of responses that supported a matched funding requirement, but a common view was that agreements should be more flexible to support the best ideas. Some suggested that matched funding may result in more

commercial ideas being supported rather than meaningful additions to underprovided PSB genres.

Equity investment received some support, often from respondents who referenced the model used for the BFI Film Fund, although some noted that equity investment implies long-term engagement and additional administration costs which may not be suitable for this pilot scheme.

Alternative ideas included varying funding conditions according to genre, sub-sector, market context and distribution platform. One further response suggested that a mixture of recoupment plus equity investment could be an option, recouping for small awards and using equity investment for projects with larger profits.

EVALUATION CRITERIA

3.8. Question 8 - Evaluation criteria

Which of the following criteria should the fund consider in respect of judging bids for funding?

- a) Quality**
- b) Innovation**
- c) Additionality**
- d) Nations & Regions**
- e) Diversity**
- f) New voices**
- g) Other, please specify**

Over a third of responses expressed support for all of the listed criteria to be considered when judging bids. Among these, however, some respondents still suggested specific criteria should have priority over others. Individually, all of the listed criteria had similar levels of support, with quality receiving by a small margin the most backing.

Those who specifically endorsed quality as a criteria made a range of arguments, including that high-quality content is vital for the contestable pilot to be judged to have a positive impact, and that all bids will be able to be assessed against it, unlike some other suggested criteria.

There was broad support for diversity and regions and nations as being important criteria for at least some of the content funded by the fund. One response suggested a two-tick system to judge applications that give preference to those outside of

London or with a diverse background. Some noted alignment between these criteria and the fund supporting 'new voices', arguing that stories and opinions from a broader range of areas of the country and sections of society are an important and under-provided aspect of PSB. A small number of responses suggested this could also include indigenous regional languages or local-specific content, while some respondents suggested that additional conditions could apply such as a diverse workforce in the production of projects.

Of the responses that supported the new voices criteria, a limited number suggested that part of the fund could be ring-fenced to provide support or training for less established talent, and therefore should not require a broadcast guarantee.

Several responses offered alternative criteria that were not listed, such as: commercial potential, reach, social impact, content for those with audio and hearing impairments, and reflection of UK life. Of these, reach was the most common suggestion with responses recommending that this should be considered along with value for money, impact and broadcasting strategy to ensure that the project is aired on the best platform to maximise the number of people accessing the content.

Finally, a small number of responses noted the potential for the bid evaluation criteria to inform the criteria against which the government assessed the fund itself at the end of the pilot.

3.9. Question 9 - Additionality

How can “additionality” (i.e. ensuring the funding is not replicating funding that would otherwise have been available) best be assessed?

A variety of suggestions were made in response to this question. Most common - put forward by over a quarter of respondents - was that the best way to identify additionality is to monitor the output and spend within the same genre, with a positive comparison against historical trends demonstrating additionality. This would be particularly important in those 'at risk' genres identified by Ofcom.

A sizeable number of responses suggested that additionality can be assessed by ensuring that new voices and innovation are considered when assessing bids. A similar number argued that an assessment should be made as to whether the project would otherwise be broadcast on a mainstream broadcaster, although among these responses there was often a lack of clarity about how this would be achieved.

A common theme among responses was that ultimately the applicant should describe how their project differs from what has already been broadcast, and why it is unlikely to otherwise be funded. A few respondents noted that it was important for bid assessment panels to have the right expertise to help identify additionality, while a few others argued that measuring audience reach and approval would be one factor for considering additional value. Finally, one respondent argued that additionality should not be a primary concern for the fund.

Annex A - List of respondents

Below is a list of the individuals and organisations that submitted a response to the consultation:

1. Aداstra Creative
2. Animation UK
3. Arts Council England
4. Arts Council of Wales
5. Azoomee
6. BBC
7. BFI
8. Capriol Films
9. Channel 4
10. Children's Media Foundation (CMF)
11. Commercial Broadcasters Association (COBA)
12. Community Channel
13. Community Media Association (CMA)
14. Creative England
15. Cwmni Pawb
16. David Elstein
17. Equity
18. Ffilm Cymru Wales
19. Folder Media
20. Frances & Ken Versluys
21. Graham Phillips
22. Huw Marshall
23. ITV
24. Jeanette Steemers
25. Jerry Alderson
26. Local TV Network
27. Made in Manchester Productions (MIM)
28. Made TV
29. MG ALBA
30. Michael Munnick
31. Omidaze Productions
32. PACT
33. Pat Younge
34. Patricia Wheatley
35. Philharmonia Orchestra

36. Premier Christian Communications
37. PSB Trust
38. PublicMedia CIC
39. Puttnam Review
40. Radio Independents Group (RIG)
41. Radiocentre
42. RawFfest - Youth Arts Festival Cymru
43. Royal National Institute of Blind People (RNIB)
44. Royal Holloway University London (RHUL) - Centre for the History of
Television Culture & Production
45. S4C
46. Stanza Media
47. STV
48. Teledwyr Annibynnol Cymru (TAC)
49. The Narrative (on behalf of a consortium of digital producers)
50. The Space
51. Tom Tugendhat MP
52. University of Kent
53. University of South Wales (USW)
54. Viacom
55. Voice of the Listener and Viewer (VLV)