

What is wrong with local & community TV in the UK?

¿Qué falla en la televisión local y comunitaria de Reino Unido?

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Abstract

The paper provides evidence for localism to be represented through 'local public service television'. The author suggests that communication responsibilities (including broadcasting and wireless broadband) should be based on the principles of devolution and subsidiarity (or double-devolution): with progressively greater localization of regulation from state to nation to the local scale.

A tiered regulatory structure of state, nation and local would conform to European cross border terrestrial and satellite regulation while transforming the scope as well as scale of public service broadcasting, introducing a greater equity for civic as well as the devolved nation democratic representation alongside the present state-wide and state-dominated channels.

Satellite TV would continue to operate across frontiers although these may become influenced by the greater critical mass afforded nation and local content that the tiered regulatory model proposes.

Resumen

El texto proporciona evidencias del contenido local que se representa a través del 'servicio público de televisión local'. El autor sugiere que las responsabilidades de comunicación (incluidas la emisión televisiva y la banda ancha inalámbrica) deberían basarse en los principios de descentralización y subsidiariedad (o doble descentralización: con un desplazamiento cada vez mayor de la regulación del Estado hacia la escala de la nación y de lo local).

Una estructura reguladora a niveles del Estado, de la nación y lo local, conformaría una normativa europea de redes terrestres y de satélite transfronteriza, al tiempo que se transforma el alcance así como la escala del servicio público de radiotelevisión, con la introducción de una mayor equidad cívica y una representación democrática de la nación descentralizada, frente a los actuales canales de ámbito estatal dominados por el Estado.

La TV por satélite continuaría operando a través de las fronteras, aunque podría llegar a ser influenciada por la gran masa crítica que ofrece contenido local y nacional en un modelo normativo escalonado.

Keywords

Local television, subsidiarity, local identity, regulation, relevant

Palabras clave

Televisión local, subsidiaridad, identidad local, regulación, relevante

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1. PREFACE

I think it is helpful to outline what is missing in the UK's broadcast communications. The public's view has been set aside in favour of maintaining a central monopoly over communications regulation and legislation.

The supposed value of erring to the interests of the large scale and supply side is that the regulation of the smaller scale the regional and (subsequently) local TV tends to conform to a common pattern regardless of scale, urban or rural coverage or demographics. In this a supposedly 'national UK' model manifests its presence throughout each regional or local representation. We have seen this most recently in the coverage of the Scottish Referendum where 'bias' as such appeared systemic and institutional.

Yet we have known from the very start of commercial television in the UK in the 1950s that there is a demand for 'local public service broadcasting'. This demand is for a greater local accountability and sensitivity in constructing local (public) services. One size geographically and demographically better satisfies central political as well as large scale commercial objectives and runs counter to public and democratic accountability.

This paper (originally written in response to an Ofcom enquiry a few years ago) might usefully be read to require a U turn in communications regulation and to engage with those living within a TV signal's catchment area, consulting on the regulation and content of services only available in their immediate area. The paper was drafted at roughly the same time the Institute published its *Pocket Local Channel Atlas (Scotland)*.

So although the experience is firmly grounded in Scotland, from the point of view of the principle of subsidiarity or appropriate local regulation, the research touches on the widespread feeling of dislocation with central regulation favouring an unsatisfied sense of localness being reflected within each nation.

What has been missing in the recent introduction of the Local Digital Terrestrial Programme Services licence (the L-DTPS) is the local engagement of viewers in combination with providers in established what service is wanted. Alternative approaches were made for content and service reach for Scotland but these were rejected for Scotland in favour of a UK-wide approach. Scotland's claim was

that its rural make-up made localism a different option while the distance of Scotland from mainland Europe meant the nation had far greater spectrum available for a more sophisticated and enlightened approach to local coverage.

In Scotland too it was recognised that new local TV services needed to dovetail with other alternative local media ambitions and to interpret the relevance of services that would together enhance the viewer-citizen's identification with an understanding of local circumstance. Historically too little attention has been paid to understanding what viewers actually want from 'local news': what is important it is not news per se but what news represents for local identity.

This paper traces some of the missed cues in the regulator's understanding of news in evidence gathered by the regulators from the 1950s until the mid 2000s.

2. INTRODUCTION

Local public service television is identified with cultural, political and economic ambitions to better represent and reflect social discourse within an identified local public sphere. The most appropriate scale of local public television should invite social participation and involvement in the operation and content of the channel, with geographical proximity encouraging citizen reflections on attachment to place, making possible contributions to cultural expression and the fulfillment of local political engagement. Negt and Kluge (1972, p. 47) suggest that this 'public sphere' "describes the social organisation by means of public communication of authentic experiences and needs that are relevant to a specific group or category of individuals, and transforms the individual experiences into one of the group". In this light, the author does not consider local and community media in isolation but as part of social process "as an integral part of the individual's active orientation towards the physical and social environment" (Hollander and Stappers, 1992, p. 22).

After 1996 'local public service television' became the more inclusive term to characterise forms of 'local TV' and 'community TV'. Agreement followed a debate at the Annual General Meeting of the Community Radio Association (now Community Media Association-CMA), held in Edinburgh in 1996. For radio,

'local' commercial forms were already established while 'community radio' was aspiring to deliver a third smaller and more civic tier. For television, a 'local' scale had not been assigned a national plan and 'public service' represented common ground between smaller commercial as well as community campaigners. However, for national and regional broadcasters and communications regulators 'local TV' meant only 'regional television', in spite of this not being a scale that viewers found particularly comfortable or relevant (Rushton, 1993, p. xiii). The 1996 CMA agreement set out to help coordinate responses to the Independent Television Commission's proposed introduction of a single type of local television license, to be known by its acronym 'RSL', standing for 'restricted services license'. For a few years the CMA provided the secretariat for a community-commercial association that became known as LiTN (Local independent Television Network). Following the award of RSL licenses, the 2003 Communications Act permitted local authorities to hold broadcasting licenses in England, though not in Scotland, encouraging local public service broadcasting to include municipal as well as community and commercial stakeholders. In anticipation of digital spectrum capable of use by local TV, the CMA provided the focus for the UK-wide organization United for Local Television to represent local public service television interests in offering universal access to local TV on Freeview.

Without a statutory right in law for each citizen to access the airwaves (or cable), the UK is out of step with what Nick Jankowski (1991, p. 85) has characterised as the ideal community service type, or purest form of community broadcasting, the 'open' or 'access' channel established widely throughout Germany and in degrees of variation in the Benelux countries. Some would argue that over the last decade the Internet has offered a better platform for individual peer to peer communication, rather than social access, benefiting from the absence of regulation rather than any positive or favourable legislation.

The modeling and construction of demand for a more local political and cultural social broadcasting space has found the UK Government to be defensive and wary, while established national broadcasters have been steadfast in countering demands for a local frequency plan on a national scale that would

represent a potentially more coherent network of local public spheres. The narrative outlined here reflects a combination of theoretical and practical interventions, from more than twenty years, providing research that has sought to inform as well as to advocate 'local TV debate', celebrating in practical ways the content and achievement of local television experience, reflecting its positive contribution to democratic debate as a form of local public service television. Hollander and Stappers (1992, p. 19) suggest "community communication is then a form of public communication". The author suggests that without 'representation' in its democratic as well as reflective meaning there is no public sphere evident, because these two forms of representation remain mutual and interdependent.

The scale of a 'local public service television' might best enclose a known and publicly accepted social geography, encircling an area where the viewer is comfortable to intervene as citizen or cultural practitioner, an area sufficiently well defined to encourage civil discourse and political consensus, constructing and reconstructing cultural reality in order to reflect personal ambition in social goals. Local public service television's civic contribution is founded on its close

proximity to [its] audience: their viewers in general are not only able to walk in and take an active part in the process of communication; this collaboration is actually required, since local TV is about the reality of its viewers' immediate surroundings. Certainly, viewers may identify emotionally with what they see, but in this case their emotion is constructive and contributes to social activation. Reflection is encouraged by examination of real, dynamic, reality, rather than the immobilized sham of infotainment and the reality show. For local TV, true audience participation is a guarantee of quantitative and qualitative success. (Campoy, 2006, p. 5)

Without a written constitution in the UK, the long-running dialogue on 'local public service television' has provided some of that missing 'constitutional' debate through identification and characterization of demand for an 'identity enhancing' television space within public broadcasting and communications. The arguments for 'local public service televi-

sion' have had to steer between three strands of state involvement: legislation, regulation and engineering. These three deserve greater public scrutiny and engagement to broaden and contribute opinions to influence the future delivery of public service communications and to question the motivation of the state's continued monopoly, and desire to further alienate the scope of public conversation and intervention in communications by regulating spectrum use through markets.

Inevitably the history addresses a lack of willingness to allow local television representations of the public's view, the growing deficit in regional television's 'public purpose' arising from, and sustained by, the arbitrary scale of television's regions that in turn are being set aside in favour of further national (UK) programming. The established broadcasters have resisted public demand to provide a smaller more relevant news and information service, commandeering technical innovations to introduce further large-scale commercial channels to exclude that more innovative and social local public purpose. From the start of independent commercial television in the mid 1950s through to the present day, a distinctive civic purpose for public broadcasting has been refused.

The 'local public sphere' has been made invisible in central Government's complicity in transforming the public as local citizens into viewers satisfied as global consumers. The *BBC* has lost a once coherent unifying social and public purpose, failing to reflect the emergence —post war and post cold war— of a demand for a more local identity in the nations, second-guessing the state's response to its own fragmentation so that by default and almost as a caricature of a public role the *BBC* has become 'state television lite' (Rushton, 1993, p. xv).

3. LOCAL IDENTITY

Before the UK's commercial television channels began broadcasting in the mid 1950s, the Independent Television Authority (ITA) considered the likely political damage of not providing regional services focused on those large communities that regarded themselves as distinctive. In considering Scotland the ITA explored a separate service for Glasgow and Edinburgh, noting in a Confidential Memo

we may as well face here the question whether the Edinburgh station would support a programme contractor of its own. I think we must certainly assume that it would. If it cannot, then it would mean our development would never cover areas of 1.5 million people or less and this would limit us to 8 stations in all. Such a proposition seems entirely untenable especially as in the USA almost all communities with over two million inhabitants support three stations or more (ITA, 1955, paper/55/51).

A separate Edinburgh and Glasgow service "would have the advantage of taking account of the existence of two separate communities, would allow us to accommodate two contractors instead of one and would give better coverage". However, less than a year later short-listed proposals indicate competition for a single station, with the Canadian broadcaster and owner of *The Scotsman newspaper*, Roy Thomson, Mr Gordon Kyle and *The Daily Express* in competition. Of these three, the ITA notes that it is only Roy Thomson who "claims to have the necessary finance" (ITA, 1955, paper/55/51:2).

A year later, with Thomson's proposal accepted, the ITA Director General, Sir Robert Fraser, receives a late indication from Thomson that he does not intend to pay the transmission fee that had been agreed with applicants. To avoid restarting the selection process, Fraser writes to Thomson in despair

I wish to goodness you had let me know at a much earlier stage during our series of discussions about Scotland that you would not in fact feel able to pay an annual rental of more than £190,000 (...). I am now having to hold up our orders for equipment for Scotland (...). We plainly cannot sign a contract for Scotland at a figure significantly below that mentioned to the twenty or so applicants without giving each one of them a chance to apply again. (ITA, 1956, Paper 28/56:2)

Against his own advice, Fraser then proposes to Thomson that the ITA announce that a "sufficient reason" for the cause of the delay to agree rental terms should be attributed to "the national economic situation, and the

central need for cuts in capital expenditure outside the direct field of industrial production" (ITA, 1956, Paper 28, 56:2). Although the regulator had reconciled a commercial rationale with public support for two channels as negotiations proceed to their climax based on operator preference for a single channel, the regulator confides in the contractor to cloud the public purpose of regulation, providing an early indication of the collapse of public purpose in later cable regulation.

Twenty years after ITV's birth, the public were advising the Independent Broadcasting Authority that 'regional news' was proving remote and often irrelevant. In responses from three out of four UK regions, sampled in October 1976, "30%, to 40% of viewers say that the news magazine deals too much with local news in other areas [in the TV region]" (IBA, 1976, para 4.6). The IBA concluded "what is attractive is material which reinforces personal identity, the sight of people or places known or recognised, and historical or cultural explorations of the local background to personal identity" (IBA, 1976, para 4.6). With this demand sufficiently evident, the regulator concluded that when new engineering opportunities for television transmission arise, what would be "welcomed would be social and cultural material of an identity-reflecting and enhancing nature" (IBA, 1976, para 4.8).

In providing evidence to the Committee on the Future of Broadcasting (1973, para 121), the IBA had earlier noted the technical feasibility "for separate local interest programmes to be transmitted from a station, or stations, covering parts of the [ITV] contract area. They are a possible development of ITV's regional structure". A year later, the Crawford Committee Report agreed that "separate news programmes (...) could make a valuable contribution to meeting the demands of viewers for a more localised service", adding that "an interest in regional programme variations grows in importance, as viewers become more selective and more aware of local loyalties and interests (...) there would be an advantage in the number of areas into which the United Kingdom is divided by the BBC and the IBA for regional programme purposes being increased" (Crawford, 1974, p. 36).

In 1977 the IBA published *Attitudes Towards Localised Television Services* finding Edinburgh still "more local in its inhabitant's experience and feelings" than some other pla-

ces surveyed. Drawing its conclusions from inquiries made throughout four regions, the study found that, "viewers do say that they would like to see TV coverage of places which are closer to where they live (...) more so than they wish to see coverage of more distant places (...) served by the same TV company" and that "the interest in nearby places emerges principally from an interest in the immediate locality". For the Edinburgh area they were more explicit, finding "there is considerable implied appetite for more local news, in that from 55% to 65% of viewers say the ITV news magazine doesn't cover enough interesting local news" (IBA, 1977).

A common criticism of Birmingham's Central News in 1984, "was a feeling that the programme concentrated too much on controversial or superficial padding, sometimes at the expense of more serious or worthy items, and sometimes to allow presenters to push their own personalities" (Kerr, 1984b, p. 4). Here news presentation, rather than news content, was favourably received as 'friendly', 'relaxed' and 'human'" (Kerr, 1984b, p. 4). With 'entertaining' cropping up frequently in responses, Kerr was puzzled by this "unusual description for a local news programme" (Kerr, 1984b, p. 4). Viewers in central Scotland were also concerned with "presentation, which many viewers considered 'amateurish', 'flippant' and 'superficial'". While here Kerr found that "items, particularly those of a serious nature, were rushed, cut short, or allowed too little time, and there was for some viewers a lack of depth and detail. Some of the existing material is considered boring and repetitive" (Kerr, 1984a, p. 3).

The former journalist Andrew Boyd suggests, "for a [news] story to have impact, it has to be relevant. For news to be relevant, it has to have proximity to an audience" (Boyd, 1993, p. 1). Yet with current regional transmission news that viewers find relevant to themselves is missing for most of the broadcast time, denied or obscured by the discomforting compromise of regional scale. In justification, Boyd characterises the news editor's role as arbitrating between relevant information and entertainment, needing to balance viewer ratings in competition with other sources of news and entertainment.

The IBA/ITC *Mapping Regional Views* study (1990) found news about a person's own locality or district as "of primary importance

[for] most people (88%)". In this study it becomes very clear that regional television occupies, on something akin to military terms, its transmission territory and broadcast airtime, blatantly confusing what is felt to be 'local' with what can be passed off as 'regional' (if called local), overlooking the evident and experienced local identification in the public's comments in *Mapping Regional Views* (Rushton, 1993, p. 116-132). A decade after, the IBA and Crawford Committee had recommended a more localised service, television engineering offered opportunities to introduce new channels, including local TV on both fifth and sixth channel spectrum (identified in 1988) as well as a reassessment of the appropriate scale of commercial regional coverage in licence renewal rounds. And yet, in spite of the longstanding recommendations pressing the local case, Government favoured equating greater channel choice with further large-scale commercial channels.

The IBA's studies from this period strongly doubt that the Government's preference for 'channel choice' reflects public support or would actually result in improved viewer satisfaction. In 1988 the IBA found there was no link between "an increase in availability [of channels and] greater appreciation" (Wober and Kilpatrick, 1988, p. 9). For while greater channel availability increased programme supply "people may yet find the end result no more satisfying". More channels served to heighten competition for viewer attention, undermining channel complementarity, where programmes are transmitted to avoid clashes between similar programme types. Yet there seemed no turning back.

It is not possible to enforce a policy of complementarity where new channels or sets of channels compete outside of a given control body; so any unregulated addition of new channels is likely to increase the amount of 'redundant availability' across TV viewing" (Wober and Kilpatrick, 1988, p. 9).

As multi-channel has extended to terrestrial transmission there are still only a handful of channels regularly watched. Spectrum wastage in terrestrial transmission of multi-choice increases proportionately, and massively, with each channel added.

Television programmes differ from other

consumer goods: if they are not watched they are lost to the viewer, or not 'consumed' and Wober and Kilpatrick conclude that, when measured using "the same 'instrument' before and after a change [from complementarity to multi-channel choice] (...) people adapt to the array of what is available so 'well', that they evince no greater satisfaction with greater than with less programme availability" (Wober and Kilpatrick, 1988, pp. 17-18). Reducing spectrum wastage has been a longstanding regulatory ambition. Yet, far from addressing wastage, multi-channel choice actually fosters a flagrant abuse of spectrum under the guise of Government response to consumer demand. The choices offered are not those the consumer makes and, in terms of spectrum efficiency, multiple but similar minority interest channels exclude delivery of greater diversity or variety by terrestrial means. With multi-channel firmly in place by 1995, the Shadow Minister for Broadcasting, Graham Allen MP, reflected upon the realisation that Wober and Kilpatrick had predicted,

yet again there is a gaping hole in the Government's proposals to provide local services rather than more of the same. In Bruce Springsteen's words, "two hundred channels and nothing to watch." If the Government became involved and took action, the alternative could be a burst of creative variety in local programming. The need for such variety will not be by the satellite television companies' introducing many dozens of channels - possibly more than 100. They do not wish to enter that market, and we shall have to look elsewhere for local provision. (Hansard, 1995)

In 1989, to better understand and anticipate the 'public's view', the IBA conducted a detailed study of public opinion to provide a benchmark against which "to assess the future developments, [and provide] an aid to future planning, and a route for viewers' and listeners' opinions to be heard" (Svennevig, 1989, p. 5). This study included a nationwide survey of public attitudes, opinions and knowledge about the state of broadcasting and its "likely future" (Svennevig, 1989, p. 5). Although the majority of viewers felt there was quite a lot of television regulation, this regulation was not 'too much' and "overall the majority of six in

ten viewers felt the amount of regulation was about right, while one in four felt there was too little” (Svennevig, 1989, p. 7). Across all demographic groups, 79% favoured the continuing supervision or regulation of broadcasting (Svennevig, 1989, p. 9). Less than one in five viewers believed these new channels would offer improved quality, with 39% believing they were likely to be of worse quality than current channels (Svennevig, 1989, p. 12). And yet, for the majority of viewers, “quality is paramount, and given the choice in principle between quality and quantity, opt for the former rather than the latter. Nine in ten viewers want better quality programmes, rather than more channels” (Svennevig, 1989, p. 13).

In 1989 the IBA set out to assess the expectation that television satisfaction would improve with the multi-channel television proposals, concluding “what is noticeable (...) is the absence of large scale special pleading [among viewer’s questioned] for more of those programme types which are often claimed as representing the shape of things to come – quiz shows, sport, soap operas” (Svennevig, 1989, p. 2). Svennevig felt that introducing further channels was unlikely to have a positive outcome, although in spite of public demand and research evidence battle lines were being drawn with, on the

one side, the Government’s White Paper [*Broadcasting in the ‘90s*, which] states that the most effective way to give viewers choice is to increase the number of channels available. Against this is the argument which states that maximum choice is achieved through scheduling diversity and range on fewer channels (Svennevig 1989, p. 5).

The Broadcast Bill of 1995, and the anticipation of digital terrestrial television, provided an opportunity for parliamentary debate on public priorities, with the shadow Broadcasting Minister, Graham Allen MP, concerned that cable and multi-channel choice had not increased opportunity, promising that with a change of government digital would not be squandered.

History, unfortunately, will judge that this Government have consistently failed to encourage local television, especially

through the cable era (...). The big network players –the BBC and the independent television companies– should see local television as an opportunity and not as a threat to their existence. We will explore ways in which to empower the ITC to ensure a strong, local element in a modern, diverse and democratic media. We will ensure that the digital revolution can spawn many local channels. That, again, will be a suitable complement to Labour’s devolution of power to the localities, regions and nations of the United Kingdom. Sadly, this Government’s broadcasting policy has meant that television has been degraded (Hansard, 1995).

The ITC’s final study on regional television, before handing its regulatory duties over to Ofcom, was conducted in 2002. Titled *Pride of Place*, Jane Sancho explored possible replacement of regional ITV programming, should the commercial operator decide “it can’t afford to produce regional programmes so it stops showing them” (Sancho, 2002, p. 29). Sancho finds support for replacing the regional service with a “network of local television services (RSLs) broadcast[ing] local programmes across the country” (Sancho 2002, p. 29). The study’s jury in the north of England had access to the local RSL, *Channel M*. This jury valued its local service for encouraging local expression, while adding that the absence of a local channel in some areas “was unacceptable, as was the fact that local news might not be provided because the costs would be prohibitive” (Sancho, 2002, p. 30). A study from *BBC Scotland, Journalism Review 2003*, evidences the continued demand in Scotland, some fifty years after TV’s public and commercial regions were established, for a local television news bulletin, wanting “5–10 minutes of local television news within the 6-7pm news hour on *BBC1* (81% interested, only 8% not interested)” (BBC, 2003, p. 13). Yet in spite of acknowledging the need to address this deficit at the time, *BBC Scotland’s* considered response explores how to satisfy the demand for local TV ‘as TV’ by examining instead how *BBC Scotland* “might provide a stronger regional news service considering the options for all services – radio, television and online” (Peat, 2006, p. 13).

A study in 2006, commissioned by Ofcom from Holden Pearmain and ORC International

(2006), found television viewers highly critical of the quality of many of the channels introduced in the 1990s by Ofcom's predecessor, the ITC. This study's respondents found the commercial channels wasteful of spectrum and of poor quality. Holden Pearmain and ORC International found the public antagonistic towards Ofcom's proposal to encourage markets to regulate the use of spectrum freed up after digital switchover. Local news and local information are found to be the most valued services that the public would like to see introduced on freed up spectrum (Holden Pearmain and ORC International, 2006, 5.27). At every opportunity the respondents' advocate a more interventionist stance from the Government, in order to maintain shared public objectives through spectrum use, while seeking reassurances from Ofcom that universal coverage will prevail for the new digital TV services. Holden Pearmain and ORC International afford a glimpse of the void that lies between public aspiration and regulatory imposition, finding viewers wanting greater vigilance and not weaker, lighter or more ethereal regulation, requiring Ofcom to supervise television operators the viewer does not trust to provide either quality or equal provision of wanted public services. Perhaps the most damning "common opinion [was] that as the airwaves are a national resource, some control should remain with the Government. If this does not happen then what was once available as a 'public' resource may be used for services that do not benefit society" (Holden Pearmain and ORC International, 2006, para 8.16).

Fifty years after the introduction of that single central-Scotland commercial TV service, Ofcom justifies replacing regional programmes throughout the UK with more cheaply made national and acquired programmes based on 'opportunity cost' (Foster, Egan and Simon, 2004, p. 20). That is, rather than replace a regional TV service with a wanted and demanded more local service, to satisfy viewer interests in ways consistent with public assessment and viable commercial scales, the alternative favoured on an economic model presses public service further into UK or abstracted commercial moulds. The conceit, that the author explores [in another paper] is that spectrum is to be made free of public accountability, to pass into private hands through auctions, markets and secondary trading on the basis of an economic opinion, without evi-

dence of better results and at odds with public consent. The market research consultations have clearly shown spectrum markets as, at best, a contentious idea and provide sufficient evidence to suggest overwhelming rejection should the public become more wholeheartedly consulted.

There was unanimous agreement in the groups that some form of intervention was necessary to ensure that services that are valuable to society are made available to the maximum number of people. Respondents felt that the private sector alone, being motivated by profit, would not necessarily deliver services that are valuable to society (Holden Pearmain and ORC International, 2006, 8.11).

Without public intervention, future communication markets will serve best only those capable of being easily reached by a commercially viable package of spectrum uses, because "consumer interests arise following the establishment of a market, in which individual consumers make decisions about the acquisition and/or use of goods and services which are provided by suppliers" (Ofcom, 2006, A7.11). In communication markets, the consumer is not individually able to increase supply through personal demand because what influences the construction, scale and viability of markets is the location of consumers close together and close to the source(s) of distribution. Ofcom supports the creation of markets that enable consumption subject to accessible markets. For terrestrial television communications, for cable and high-speed broadband, these markets are built around the reach of transmitters and the bandwidth of cable and location of digital switches. It is network capacity rather than demand from consumers as individuals that determines commercial efficiency in delivering communications services to households on a local as well as regional scale.

In the course of the last fifty years a repeated if moderate voice has been recorded reminding Government, regulator and broadcaster that the public require broadcast supply to fit the contours of civil society, not to have civil society conform to the contours of commercially satisfactory economics. As the author suggests, the evidence of the public's view has been ignored, even wilfully distorted,

pushed aside to favour commercial ‘cherry-picking’ to deliver a supposedly greater choice through multi-channel broadcasting which, for many, offers no real choice at all. In 1989, the IBA argued that multi-channel choice would not necessarily enable greater choice but would certainly increase spectrum wastage, providing redundant programming in a heightened competition as generally less watched channels chase each other for viewer attention. Multi-channel choice has undermined public purpose (on commercial television) and now seems set to threaten universal reach and the potential more localised innovations in public service communications the public has prioritised (Sancho, 2002, p. 30, Holden Pearmain and ORC International, 2006, 8.16).

Rather than respond to this evidence by tailoring services to address demand, Ofcom has encouraged ITV to withdraw from regional (non-news) public service programming during digital switchover, to enable the commer-

cial public service to compete on commercial terms with channels not required to provide universal coverage or satisfy public purpose. Where does this leave ITV’s public obligations? Ofcom offer no evidence that heightened competition will improve the quality or extend the purpose of commercial or public service television. In withdrawing from public service obligations, ITV is not giving up public service spectrum (with access to 98.5% of homes) or their prominent position on electronic programme guides. Instead of building upon Sancho’s (2002) study for the ITC, and introducing local TV to replace the regional loss across all areas of the country. The regulator disapproves of a comprehensive universal local public TV service, using add/drop technology. And yet universal access to local television as a public service remains the public’s requirement of Ofcom evident in studies by MORI (2005) and Holden Pearmain and ORC International (2006).

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Dave Rushton has been researching, writing and working on local TV since 1983, publishing *Citizen Television: a local dimension to public service broadcasting*, with John Libbey in 1993; *Local Television Reviewed: essays on local television 1983-1994*, John Libbey, (1994); *Creating Local Television*, CMA and John Libbey, (1997); *Don Quixote's Art & Television: seeing things in art & television*, School Press, (1998) and *Local Television Renewed: essays on local television 1994-2005*, ILT (2005) and most recently *Local Public Service Television*, ILT (2009).

Since 1989 Rushton has been director of the Institute of Local Television. He has been a Director of NvTv, the Belfast local TV channel since 2004. Rushton was awarded a doctorate on 'local public service television' from the University of Glamorgan in December 2008.

While continuing to lobby for a more locally accountable TV, in 2012 the Institute launched www.summerhall.tv and subsequently www.artinScotland.tv, www.writerstories.tv and www.craftscotland.tv in an on-going development of arts and culture related TV sites. Contact: local.tv@virgin.net [@SummerhallTV](https://twitter.com/SummerhallTV)