



Center for Social Media

The Rise and Fall of the Public Service Publisher

A briefing paper prepared for the Center for Social Media

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Introduction

The Center for Social Media at American University defines “public media” as “media for public knowledge and action”—a central tool for informing and mobilizing diverse publics around shared issues in a democracy.

Public media have emerged in many forms throughout the past two centuries, but for much of the 20th century, public service broadcasting was the gold standard of public media. The BBC served as its prime example, well funded and continually innovating as broadcast platforms expanded. However, the rise of competing broadcast and online content platforms, along with the switch from analogue to digital broadcasting, have presented a challenge to the BBC’s broadcast model.

This briefing examines the rise and fall of a proposal for a Public Service Publisher (PSP)—a new organization that would commission independent public media content across a range of participatory digital platforms. This central policy debate in one of the largest and most influential public broadcasting systems in the world provides useful parallels for U.S. policy and public media makers. They too face the rise of Web 2.0 models, questions about how copyright restrictions should apply to public content, the shift to digital broadcasting, and the widespread commercialization of the media sector.

Below, Goldsmiths Senior Lecturer Des Freedman examines the implications of the policy battle around the PSP, and offers a critical assessment of how it has affected the larger debate about public service broadcasting in the UK and elsewhere. Freedman explains the logic of PSP, its advantages and flaws, and implications for other nations grappling with similar questions about how to support media for public knowledge and action in a shifting media landscape.

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Executive Summary

In 2005, the British communications regulator Ofcom released its detailed three-part review of public service broadcasting (PSB), the remit governing the majority of broadcasters throughout British broadcasting history. While supporting a continuing role for PSB in a digital era, Ofcom found that the arrangement whereby commercial broadcasters provided public service programming in return for access to the airwaves was breaking down given the declining value of analogue spectrum in the run-up to the switchover to digital television. In this situation, Ofcom, as the body with statutory responsibility for ensuring broadcast diversity and with specific oversight over commercial channels, concluded that the publicly-funded and state-owned broadcaster, the British Broadcasting Corporation (BBC), was likely to end up as a “near monopoly provider of PSB” (Ofcom 2004: 13). The regulator therefore recommended the creation of a new competitive supplier of PSB content, a Public Service Publisher (PSP), the role of which would be to facilitate the creation of innovative and publicly engaged material.

As a “publisher” rather than a broadcaster, the PSP would focus on commissioning material from the UK’s thriving independent media production sector to be distributed on a range of new digital platforms including the internet and cellphones. The PSP would take advantage of the interactive and participatory possibilities of non-linear media, offering the promise of empowering publics to shape their own media projects. It would also rely on an open “share-aware” rights model that more adequately reflects the nature of content creation and distribution in an online environment. Furthermore, the PSP would, like the BBC, be publicly-funded and not financed through advertising, subscription or sponsorship.

Working with a small group of new media entrepreneurs, Ofcom drew up more detailed proposals for the PSP throughout 2006 and 2007 and published discussion papers—*Digital PSB* (Ofcom 2006) and *A new approach to public service content in the digital media age* (Ofcom 2007)—that firmly identified the PSP’s provision of public service content with the participatory and interactive possibilities of digital media. Respondents to the latter document included the major broadcasters, industry trade bodies, new media producers, public interest groups and trade unions who adopted a range of contrasting perspectives on the PSP idea. Then, in March 2008, after more than three years of discussion and consultation, Ofcom announced the abandonment of plans for a PSP, arguing that the idea had served its purpose in focusing attention on the role of digital media in the future PSB environment, and insisting that public service content could be delivered without the need for a new dedicated organization.

This briefing considers the likely advantages and disadvantages of the PSP in relation to future forms of public media, contrasting the valuation of public media for its civic and social functions to a neoliberal framing of public media as a site for national economic stimulus. The difference in approach signals a policy shift—from construing members of the public as active citizens to positioning them largely as consumers and “users.” It also examines the possibility that the PSP proposal was a veiled effort to restrict PSB due to pressure from commercial stations and producers.

Despite the demise of the PSP idea, the attendant debate nevertheless raised fundamental arguments about the shape of public media in a digital age, and shed light on similar policy and marketplace issues in the U.S.

The Context of the PSP: The Crisis in U.K. Public Service Broadcasting

The foundation of public service broadcasting in the UK is the BBC, set up in 1927 to provide “information, education and entertainment” on the basis of a flat-rate licence fee payable by all listeners (and, subsequently, viewers and downloaders). Commercial television was introduced in 1955 and commercial radio added in 1972 – both on strictly regulated terms: For example, programming obligations imposed on the new for-profit services included maintaining political impartiality, broadcasting prime-time news, and transmitting current affairs content, children’s programmes and material of regional relevance.

Commercial TV in the UK was therefore set up *not* on the basis of rejecting PSB principles but of emulating them. Indeed, because the BBC had a monopoly over licence fee revenue and commercial broadcasting had a monopoly over advertising revenue, competition was limited and a comfortable “duopoly” established. Further terrestrial channels were introduced (BBC2 in 1964 and Channel 4 in 1982) that served to expand this relatively stable and highly regulated public service environment. PSB, therefore, was dependent on, but never limited to, the BBC in the British broadcasting environment.

This PSB “consensus” has come under increasing pressure in recent years from a range of political, economic and technological factors:

- Terrestrial audiences have declined given the competition from cable, satellite and internet platforms, with the total share of the five terrestrial channels falling from 77.7% in 2002 to 66.8% in 2006 (Ofcom 2007b: 2).
- This has contributed to a fall in terrestrial broadcasters’ advertising revenue of some 7% from 2002 and 2006 (2007b: 3). Additionally, the licence fee has failed to keep pace with inflation and its entire future is set to be reviewed in 2011.
- The massive growth in the number of media outlets and platforms has led to a sustained questioning, primarily by commercial interests, of both the need and justification for the “imposition” of public service obligations in what they describe as

an increasingly “competitive” environment. What, many critics ask now, is the *point* of public service broadcasting in a multi-channel age?

- Market-oriented assumptions increasingly dominate the UK media sector and are further legitimized by media policymakers and regulators through successive acts of market liberalization and deregulation, such as the relaxation of media ownership laws, adoption of self-regulatory codes, and loosening of media content rules.

As a result, public service and commercial principles are locked together but are seen less as complementary forces (as they were during the “duopoly”) than as mutually exclusive ways of organising broadcasting. Given the ascendancy of neoliberal visions for broadcasting, it is the PSB model that is very much on the defensive.

Plans for a Public Service Publisher (PSP)

In 2005, the UK communications regulator, Ofcom, released its detailed three-part review of public service broadcasting. While supporting a continuing role for PSB in a digital era, Ofcom found that the traditional arrangement, or “compact,” whereby commercial broadcasters provided public service programming in return for access to the airwaves was breaking down. With its oversight of both analogue and digital spectrum and its remit to stimulate the UK communications market, Ofcom was especially concerned about both the the viability and the plurality of the broadcast business in a changing environment.

In the run-up to digital switchover, scheduled to start in 2008 and to end by 2012, the main commercial terrestrial channel, ITV, has already scaled back its level of non-news regional programming, as well its religious and children’s programming. ITV claims it has no financial incentives for continuing to produce such “unprofitable” genres. Despite its power to fine broadcasters for not meeting their full obligations, Ofcom has shown no inclination to do so.

In this situation, of a likely “market shortfall” in the provision of PSB, Ofcom concluded that the BBC was likely to end up as a “near monopoly provider of PSB” (2004: 13) and so recommended the creation of a new competitive supplier of PSB, a Public Service Publisher

(PSP). The PSP would in no way resemble a traditional broadcaster but, instead, would focus on seeking out material—what Ofcom now describe as “public service content” (PSC)—from the UK’s thriving independent production sector. This would be organized along the same lines as commercial but not-for-profit “publisher-contractor” Channel 4 is organized. A budget of some £300m [\$600m]—equivalent to 10 percent of the more than £3bn [\$6bn] generated by the licence fee each year—was initially mentioned, a sum roughly comparable to the “implicit subsidies” received by commercial broadcasters for their access to the airwaves. This money would come not from advertising or sponsorship but from general tax revenues, a levy on commercial broadcasters or, as became most likely, from a “ring-fenced” (i.e. dedicated) portion of the licence fee.

Ofcom continued its work on the PSP by setting up a Creative Forum and convening a series of workshops involving industry experts on a range of content-related topics including factual, social action, arts, interactive entertainment and drama. The proposal was further refined by the acknowledgement in *Digital PSB*, published in July 2006, that the “PSP would be focussed on creating content and services that make full use of the interactive and participatory nature of new media technology” (Ofcom 2006: 27). The paper also highlighted the importance of addressing specific *community* needs through PSP service and of allowing both geographical and “religious, ethnic or interest groups to develop compelling offerings” (2006: 28).

Ofcom fleshed out and scaled down the proposal in its discussion paper of January 2007. The proposed budget ranged from £50-100m a year [\$100-200m]—roughly equivalent to the BBC’s spending on its web service, *bbc.co.uk*—and it was proposed that the PSP would focus on commissioning and distributing exclusively *broadband* content to be accessed on a range of digital platforms including the internet, mobile devices and DTV.

The PSP was further considered as part of Ofcom’s second review of PSB, launched in September 2007 to consider the prospects more generally for public service broadcasting (Ofcom 2007b). However, in March 2008, Ofcom announced that it was abandoning plans for a PSP, insisting nevertheless that the debate had been invaluable in drawing attention to the importance of digital media in delivering public service content in the future. “I think we

can safely declare this question resolved” argued its chief executive, Ed Richards. “The PSP as a concept has served its purpose” (quoted in Tryhorn 2008). But, as this briefing seeks to consider, *what* purpose and *whose* interests have been truly served by the PSP debate?

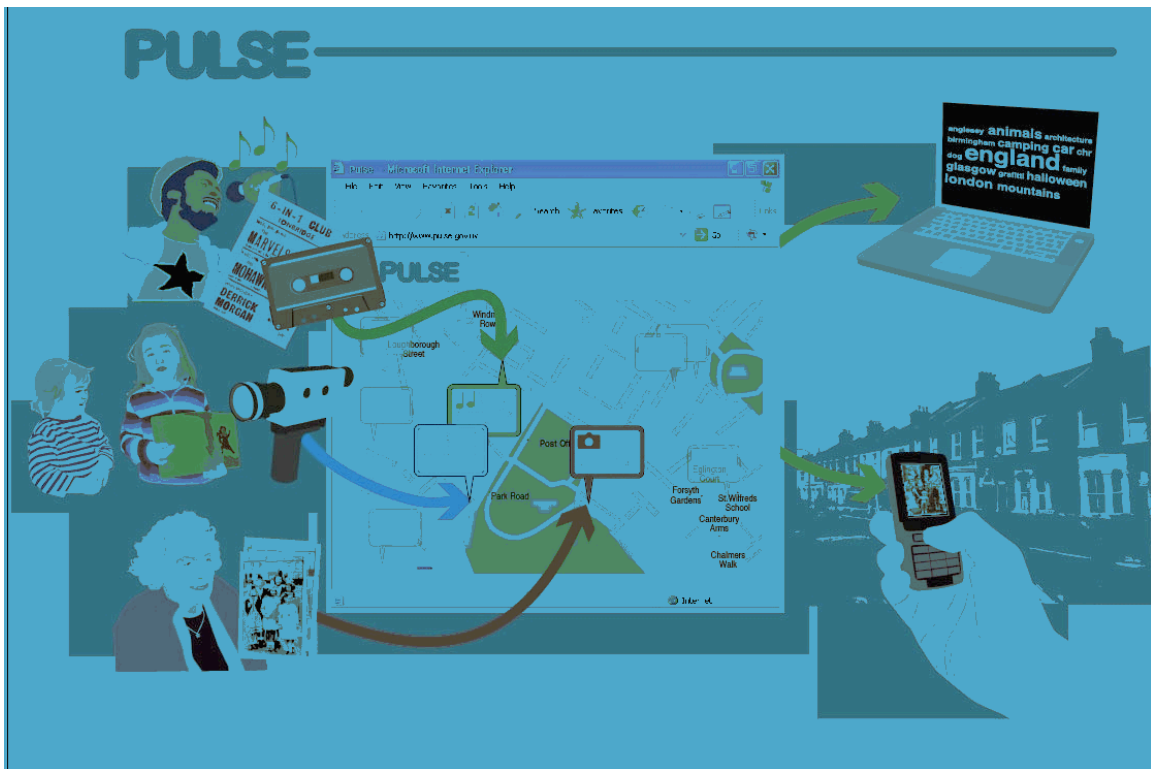
Key Features of the PSP Proposal

According to Ofcom (2007a: 6), the PSP “would meet public purposes using the tools, technology, insights and culture of digital media”. Content and services would be commissioned on the basis that they facilitated:

- **Participation:** Far from the model of the old “passive viewer”, the PSP would rely on “active participants who produce, modify, comment on, judge and repurpose content” (2007a: 28). According to Andrew Chitty, Managing Director of multiplatform production company Illumina Digital and a contributor to the report, “any new vision of Public Service Content has to be underpinned by the idea of user participation. This is the defining quality that separates successful networked content from broadcast media” (2007a: 28).
- **Personalization:** No longer would the audience need to be conceptualized as a homogeneous and ill-defined mass, but as a series of discrete individuals with different and quite specific needs.
- **Permeability:** “PSP-supported projects and services blur the distinction between producers and consumers” (2007a: 30) further undermining the need for traditional “gatekeepers” and enhancing the possibility of genuine dialogue.
- **Community mediation.** Communities, however defined, would be able to use the participatory tools provided by PSP projects to enhance cohesion and to empower themselves in ways that they—and not government or an out-of-touch broadcaster—decide is appropriate.
- **Sensitivity towards location:** Taking advantage of mobile technologies, PSP content would be “delivered to users dependent on where, as well as when they want to engage” (2007a: 31).
- **Collaborative authorship and diversity:** The PSP would involve and articulate a wide range of new and existing voices who, by working together, “will foster the diversity of views that is felt to be disappearing from Public Service Broadcasting” (2007a: 31).

Examples of possible PSP content, mentioned in Ofcom's discussion paper of January 2007 include:

- *Pulse*, a multimedia archive that would allow users to post their own material to create interactive, constantly changing community interfaces that combine oral history with contemporary events.



- *City Confidential*, an urban thriller set in the world of a cutting-edge newspaper that focuses on celebrity, corruption and culture. Aided by user-generated content and audience suggestions, this would be an online drama that took advantage of both televisual conventions and viewer participation and could be accessed on TV, online, mobile phones and on public screens located in major urban spaces.



- *DB²*, an online community aimed at providing much-needed content for diabetes sufferers. It would feature a range of educational, informational and interpersonal services, much of it created by the diabetes community itself, to facilitate better management of a crucial health-related issue. Given mainstream broadcasters' and portals' reluctance to engage with such issues, this service could be extended to other patient communities.
- *Genie*, an online space in which scientists and ordinary citizens could come together to discuss and make decisions on the future of UK energy policy. Films would be made reflecting different positions on issues such as nuclear storage, energy security and the viability of renewable technologies and through further online and offline deliberation, a final “energy document” would be disseminated both to the public and politicians.

Ofcom emphasized that, in all cases, services would be multi-platform, fully interactive and dealing with topics of public interest that commercial organizations are increasingly reluctant to engage with. This would involve three overlapping types of content (2007a: 36):

- Content-led services that would use digital media to empower individual users of, for example, health or government services and to increase the efficiency of those organizations;
- Narrative experiences whereby new fiction and fact-based content would be professionally produced to take advantage of the possibilities of networked media;
- Community-generated content whereby a range of user groups would be able to produce material for themselves (instead of relying on “experts” to do so on their behalf) and thus facilitate better community cohesion.

Ofcom also argued that the PSP would be encouraged to embrace an open “share-aware” rights model that would more adequately reflect the nature of content creation and distribution in a digital environment. In particular, Ofcom acknowledged that, as the public service remit of the PSP required a more open and flexible use of intellectual property.

“[T]he PSP will need to innovate not only in terms of content, but also in the use of that content. In the participative media environment, a key part of its public service remit will be to make much of its content available to users and to allow extensive re-use, interaction and modification” (Ofcom 2007a: 41). This would require balancing possibilities for commercial exploitation and audience re-purposing of content in what Ofcom called “[m]ulti-party exploitation of public service content” (2007a: 42). In the case of *City Confidential*, for example, this might involve a range of both free and paid-for services including local versions of the drama, supporting websites that allow users to reflect on issues concerning their own cities, computer games and other software, and a DVD that could combine content produced by the original creator with contributions supplied by other users.

In conclusion, the PSP would increase the plurality of public service content in the U.K., facilitate new forms of dialogue and communication, stimulate the independent content production industry, and provide audiences with a variety of personal, educational and social benefits.

Issues Arising from the Proposal

The idea of a PSP was initially welcomed by some significant figures. Former culture secretary Tessa Jowell greeted it in Parliament as a “very interesting proposal... Obviously it is a proposal that we will give proper and detailed consideration to” (House of Commons, 2 November 2004). Culture minister Shaun Woodward insisted that “what we can be certain about is that the concept of Public Service Publishing is bound to play an important place in the future but what we can be less certain about is what form it should take and how it should be financed” (House of Commons, 14 June 2007). PACT, the trade association for independent production companies, claimed that “an injection of additional investment through the PSP could help unlock the creative and economic potential of UK new media producers.” Even some media reform groups, desperate to secure a viable future for PSB, cautiously embraced its spirit. Jocelyn Hay of the Voice of the Listener and Viewer, the well-respected lobby group for quality broadcasting, welcomed it as an idea with some potential while the Campaign for Press and Broadcasting Freedom acknowledged the PSP as “an innovative proposal that is citizenship based” (CPBF 2007).

However, the PSP proposal also met with strong opposition. The BBC questioned why another organization would be needed to provide public service content when it is investing so heavily in digital content. Rights holders represented by the British Copyright Council opposed any talk of a new “open rights” approach, while a range of corporate voices, from the Guardian Media Group to News International’s chief lobbyist Irwin Stelzer, warned that a PSP would only stifle innovation and replicate activities that are already taking place through market incentives (as opposed to “top-down” regulation).

For proponents of public service broadcasting, there was much in Ofcom’s PSP to support: its emphasis on public engagement, user participation, community needs and a less restrictive rights model. However, Ofcom’s proposal was not separate from the regulator’s general determination to secure a more competitive and liberalized media environment. The PSP, therefore, was part of a wider re-structuring of the British media that involved not an expansion but a restriction of PSB, a way of framing public service content not as a cultural and social phenomenon in its own right and with its own logic and values, but instead

contextualizing it primarily in relation to the impact it has on the wider media market. Such a conception of public service has important implications not simply for specific initiatives like the PSP but for the future of public media as it evolves in a range of contexts and forms. This makes it important to identify any underlying weaknesses in the PSP proposal, as with any other plan for the delivery of public service content, if public media are to play a crucial role in education and democratic self-determination in years to come.

What kind of pluralism?

Ofcom's exhortation that a PSP would be necessary to facilitate a plurality of PSB providers depended on a very narrow conception of pluralism—one that focused on plurality of *supply* but not of voice or vision. Compare Ofcom's definition to a previous argument about pluralism driving a new broadcast institution in the U.K.:

Plurality is at the heart of successful PSB provision. It involves the provision of complementary services to different audiences...a range of perspectives in news, current affairs and in other types of programmes; and it provides competition to spur innovation and drive quality higher. (Ofcom 2004: 7)

'[W]e do not see the fourth channel merely as an addition to the plurality of outlets, but as a force for plurality *in a deeper sense*. Not only could it be a nursery for new forms and new methods of presenting ideas, it could also open the door to a new kind of broadcasting publishing. (Annan 1977: 235)

Back in 1977, the Annan Committee on the Future of Broadcasting used the language of radical social change in its proposal for an Open Broadcasting Authority, laying the basis for what eventually became Channel 4.

We see the fourth channel not just as another outlet or even just as a means of giving a more varied service to the audience. It should be the test-bed for experiment and symbolize all the vitality, new initiatives, practices and liberties which could inspire broadcasters. (Annan 1977: 472).

Indeed, Ofcom presented its ideas for the PSP as following directly in the tradition of Channel 4. “Just as Channel 4, in its early years, had guaranteed funding and a remit to pursue public purposes with innovative ideas, we believe a new PSP could be created with similar ambitions for the digital age’ (Ofcom 2004: 13). The difference, however, is that Channel 4 was created not simply to add capacity to British broadcasting but to deal with what was perceived as a politically and culturally stifling consensus. As Anthony Smith, one of Channel 4’s creators put it:

The “duopoly” of BBC and ITV was a pair of millstones which inhibited or shunned new people and ideas. So Channel 4 was given—and retains— a structure and a function different from all the other channels. Its role was to invest in undiscovered talent, and to employ it to amuse, shock, gratify, confirm, undermine. Its remit was not to succeed but to try, in interesting ways. (*London Evening Standard* 25 October 2004)

Channel 4, despite accusations by Smith of cynicism and commercialism in recent years, was originally designed in response to the failure of existing broadcasters to articulate public debates and divisions in the U.K. at the end of the 1970s. The PSP proposal, despite its eagerness to paint citizens as creators of content, was far more limited in its remit, often viewing the public as “users” and “consumers” of services and seeing public service itself as an adjunct of the market.

The BBC adopted a different approach to the question of pluralism in its response to the PSP proposal, arguing that the situation in the digital age in no way resembled the restricted broadcasting environment of the 20th century and that, as a consequence, there was no shortfall in plurality. “Arguably, there is not only greater plurality in the internet market today than there was in the broadcasting markets of the 1950s or early 1980s, but more plurality on the internet than in broadcasting in 2007” (BBC 2007: 3.5). There is, according to the BBC, no need for a new organization when “healthy competition for quality” (2007: 3.6) means that the BBC, together with a huge range of other suppliers, are already producing innovative online content that is helping to ensure that diverse consumer needs are met. “In this case”, argued the BBC, “additional intervention by regulators should

perhaps move away from the model of a single new public or quasi-public body acting as content commissioner, and more explicitly promote and support plural content creation, and wide public access to it” (2007: 3.10).

Sustainability of public broadcasting in a “knowledge economy”

In a market-driven age, it is highly unlikely that the PSP would have been given the same creative and financial freedom as was Channel 4. The success of the PSP was to be measured in part by its contribution to the health of the wider media economy and not simply in relation to the creation of public knowledge. According to Andrew Chitty, the PSP “would call into being a new wave of creative businesses that would serve the UK well in the changing media landscape” (Ofcom 2007a: 27). Indeed, it was locked into a far more rigid economic model based on the belief that, as it is competition that drives innovation and delivers quality, “the PSP could be the senior partner in joint venture or venture capital style relationships” (2007a: 40). This reflected an underlying belief that, although the PSP ethos would fit a non-profit organization, Ofcom’s understanding is that “not-for-profit organizations may be less efficient in delivering good value for money” (Ofcom 2004: 82).

Ofcom’s focus appeared to be on the capacity of the PSP to assist in the further development of a thriving domestic creative sector – an approach that resonates with the government’s desire to foster a “knowledge economy” based on the exploitation of culture and creativity. Drawing once again on the impact of Channel 4 in stimulating a more competitive commissioning sector, one prominent new media producer argued that the PSP “could have the same galvanizing impact on the interactive media sector [as Channel 4 did on the independent production sector] — turning acknowledged creative excellence into real economic value” (Ofcom 2007a: 37).

It is notable that, there is little evidence that the creation of a thriving independent sector has, in itself, translated into a more mature and innovative broadcast environment. The assumption embedded in this approach is that everything that public broadcasters do is elitist and deeply conservative, which has not been the case. This framing of the role of the PSP reveals a lot about the current prioritization of entrepreneurial skills and economic conceptions of value. In fact, when Channel 4 was first under discussion, the broadcast

regulator suggested that independent production companies would provide, at most, 35 percent of programming, with the majority of programs coming from the existing ITV companies. In its first year of transmission, some 29 percent of Channel 4's program hours were supplied by "indies" with the rest coming from ITV and foreign acquisitions. This was enough to help stimulate a new sector, but it is not the case that the channel depended exclusively on independent producers in the way that Ofcom enthusiastically talked about them in relation to the PSP. But it was the creation of added economic value, rather than public knowledge, that was a recurring theme throughout the regulator's plans for a PSP.

Technological determinism

PSP discussion documents are also littered with determinist accounts of technology and content production. The entire premise of the PSP commissioning *broadband* content is that it would necessarily facilitate participation and a de-centering of traditional media gatekeepers. "Whilst traditional media technologies primarily concentrate on the distribution of ideas, the interactive media technologies are concerned with handing active control and the ability to communicate to citizens" (Ofcom 2007a: 11). This assumes an automatic correlation between digital communication and enhanced political representation. Citizenship, however, is not produced spontaneously through limited "user participation" (for example, dialing a phone number on *American Idol* or uploading a video on YouTube) but through a more fundamental engagement and confrontation with different, conflicting perspectives and positions. While there are many characteristics of digital media that can aid deliberation and participation, it is far from inevitable that this will be the eventual outcome

Similarly, just as traditional broadcast media relied on a hierarchical "one to many" model, there are nevertheless many examples of "old media" contributing to public knowledge and action, not least of which involve the news bulletins and documentaries of public broadcasters like the BBC, NPR and PBS.

The funding of PSB

Some of the opposition to the idea of a PSP was focused on the possibility that it would be financed through the licence fee that provides the BBC with the vast majority of its revenue, thus undermining the stability and future of the Corporation. Jocelyn Hay of the Voice of

the Listener and Viewer confirmed to a House of Lords committee that “we certainly would not support the idea of any top-slicing of the licence fee going to subsidise commercial companies” (Hay 2007) while the CPBF “emphatically” opposed any use of the licence fee to sustain the PSP, recommending instead a small cross-subsidy of all commercial providers (CPBF 2007).

Indeed, the PSP debate served its purpose, not simply in highlighting the importance of digital media, but in fostering a consensus amongst government, media regulators and the BBC’s commercial competitors that the BBC should no longer have exclusive access to the licence fee. There is now increasing agreement that public money for PSB should be “contestable”, i.e. open to competitive bids. This was expressed most clearly by the House of Commons Select Committee on Media, which rejected plans for a PSP but concluded that “public funding should be made available beyond the BBC on a contestable basis, to sustain plurality and to bring the benefits of competition to the provision of public service content that the market would not provide” (House of Commons 2007: 52). PSB, in this scenario, would be reduced to a handful of individual programs, competitively allocated, in “minority interest” areas like news, current affairs and religious programs that commercial providers had either no obligation or little interest to serve. It would lead to the fracturing of the PSB system on which British broadcasting has long been based.

The problem is that discussions concerning a PSP took place in the context of political, commercial and regulatory challenges to the existing delivery of PSB and that the proposal only served to highlight the view that funding for PSB cannot be allowed to rise. If the delivery of PSB is to become increasingly identified with a PSP operating on a budget that is approximately one-fiftieth of the current licence fee revenue, or indeed with any other kind of digital platform, this puts more pressure on the provision of PSB in general and on the future of the BBC in particular.

Is there an alternative?

Ofcom’s argument for a PSP was based on a notion that existing PSB commitments, particularly those of the main commercial channel ITV, are unsustainable after digital switchover. Why should this be the case? Surely, it is a regulator’s job not to accept market

developments as simply inevitable but to think of ways of addressing the fundamental problems they produce— in this case, sustaining PSB at a time of technological change. In part, this is because, as Ofcom itself acknowledges (2007a: 24), it relies on a highly economic account of PSB which judges success based on market failure rather than a positive account of its cultural significance. But it also points to an uncritical approach to market logic at the top of the broadcasting establishment. As the Campaign for Press and Broadcasting Freedom argued in its response to Ofcom:

We do not think that a new “Publisher” of broadcast material should be seen simply as providing limited “public service content” and addressing “the particular shortfalls that can be expected in the PSB arena”. We think that those shortfalls should themselves be addressed, and we note that one of the causes of the shortfall – changes in spectrum policy [that are likely to involve the sale of spectrum to the private sector] – is the result of Ofcom’s own proposals. (CPBF 2007: 2)

Proponents of public media need to challenge those policy proposals that are predicated on the inevitable collapse of the profits of commercial terrestrial broadcasters or, indeed, on the notion that private ownership is the single most efficient or desirable way of facilitating media content. According to media academic Georgina Born, ‘there are serious questions as to whether Ofcom is right in its analysis that a loosening of ITV’s PSB commitment is unavoidable, and in its assumption that Britain’s commercial broadcasters cannot be held to PSB purposes through content regulation’ (Born 2005). Rather than tinkering around at the edges of broadcasting by creating a PSP, Born suggested tighter regulation of the existing commercial broadcasters in order to guarantee fulfillment of their public service obligations. Whatever the specific merits or demerits of the PSP, proponents of public media cannot afford to accept market developments as “inevitable” and need to think imaginatively and critically in drawing up alternative policy suggestions and scenarios.

International Implications

The PSP debate may resonate strangely in countries like the U.S. and Australia, where free market logic rules much of the media markets, or in countries like China, where government

control of media is of utmost concern. Why should public funds continue to be monopolized by a state-owned corporation and not by smaller, more dynamic independent producers?

First, the PSP idea should remind us to be cautious when we hear “innovative” new proposals about the future of public broadcasting coming from more commercially-minded sources. It is vital that non-commercial media should not be ghettoized in outlying areas of our media systems and that new digital technologies should not be used as, above all, instruments of cost-cutting. Quality does not come cheap and the internet, with all its possibilities, cannot be expected to do away with the costs of R&D, scriptwriting, production, newsgathering and fact-checking.

Second, it is important to stress that the BBC is *not* a state broadcaster but a unique proposition: an organization paid for by the public, formally independent from vested interests and, theoretically, accountable only to licence fee payers. While, in reality, the BBC is tied to—and expresses the views of—elites in many different ways, it nevertheless provides a space in which market forces are held at bay and in which publics are able to articulate their voices in competition with those of more powerful groups.

Third, it is no longer the case that the independent sector in the UK is a hub of small but energetic grassroots players as is sometimes argued to be true in the U.S. Quite the opposite: it is a rapidly consolidating area of the British media where venture capitalists are increasing their influence and where a handful of large independent companies dominate production.

The crucial point is that those who are most vocal in their support for a smaller and less influential public service broadcasting sector are precisely those commercial groups—broadcasters, ISPs, online content producers—who have most to gain from media systems in which non-market actors and objectives are marginalized. The struggle to defend PSB in the UK is linked to the struggle to beat off cuts to public broadcasting in the US through a common understanding of the importance of all non-commercial spaces if we are to seek genuinely pluralist media environments. The ghettoization of PSB in the UK will only add to the confidence of companies like Fox, Viacom and Clear Channel who want to increase their

share of US media markets and further galvanize those politicians who see little need for government support for public broadcasting in the digital age.

Non-UK readers can take much from Ofcom's PSP proposal in its recognition of the need for financial support for less commercially viable areas of programming and its determination to take advantage of the participatory and interactive possibilities of digital media for public knowledge. Such arguments are just as valid in environments with more fragile public media ecologies in that they draw attention to the shortcomings of market approaches to and wholly instrumental considerations governing media policy decisions. However, the PSP debate should remind supporters of public media in all countries that they may undermine their own position if they accept the argument that public media, while serving certain social purposes, is necessarily subservient to or dependent on commercial media interests. Public media has a different history and a different logic.

Public Broadcasting and the "Public Interest"

In media systems dominated by for-profit organizations whose main concern is to maximize readership, ratings and revenues, proponents of public and non-commercial media argue that they have an especially important role to play. Such projects are described by both media theorists and policymakers as essential to the creation of pluralist media environments in which multiple forms of finance, ownership and content are more likely to facilitate diversity and stimulate meaningful competition and public engagement. Public broadcasting, in particular, has proven to be a crucial example of the "corrective surgery" that is necessary to compensate for the tendency of markets to under-serve minority audiences and to produce powerful private monopolies in the production and circulation of media content.

Yet, public broadcasting is not merely the medicine that it is sometimes necessary to take to counter the ills of commercial television and radio. In many ways, it is a different kind of cultural institution with its own vision of broadcasting based on contrasting values and commitments. While there are many versions of what is ultimately a philosophy rather than a particular channel or set of programmes (see Blumler 1991), there are nevertheless some

core normative principles common to different conceptions of the public broadcasting “idea”.

Firstly, public broadcasting is based on the rejection of “the market definition of broadcasting as the delivery of a set of distinct commodities to consumers rather than as the establishment of a communicative relationship” (Garnham 1994: 18). Public broadcasting’s main goal is not to sell audiences to advertisers or subscription broadcasters but to provide “a medium for the performance of a valuable public service’ as the first government inquiry into broadcasting put it in 1923 (quoted in Curran and Seaton 1991: 297). Broadcasting, according to this view, should facilitate public knowledge and not private transactions. Secondly, this involves the characterization of its audiences as rational citizens with a broad range of interests and needs that must be met irrespective of their purchasing power, geographical location or social position. Thirdly, public broadcasting attempts to foster, independent of government and vested interests, what Scannell and Cardiff (1990: 277) describe as a “shared public life”, the “we-feeling” of membership of national or regional communities that may be counterposed to the “I-feeling” engendered through the free market’s emphasis on individual consumer preferences. Finally, through achieving all the above, public broadcasting is seen as a profoundly democratic phenomenon and as a key means through which public opinion is realized and cemented. Acknowledging Jürgen Habermas’ emphasis on the idea of a public sphere and communicative rationality, Scannell (1989: 136) describes public broadcasting “as a public good that has unobtrusively contributed to the democratization of everyday life.” These claims provide an instructive framework for considering the future of public media as it moves from traditional broadcasting platforms and into more fragmented and participatory online spaces.

Ofcom’s “market failure”-led notion of public service broadcasting is different from the robust “common good” interpretations of public service broadcasting described above that understand it not as an accessory to market relations but as a countervailing force to them, as a pole of attraction with a very different dynamic to that of private accumulation. We can see this dynamic in key institutions of the public sector in the UK—the National Health Service, free comprehensive schooling as well as the BBC— that serve the public interest and help sustain democratic citizenship. Colin Leys argues that these public services “are the

defining features of a civilized society, which capitalist market production, if it persists at all, should exist to pay for, and to which it should be subordinate” (2001: 220). This refers to a “non-market domain” (2001: 224) in which essential services are provided, the market is kept at bay, and boundaries between the public and the private are well policed in order to prevent the infiltration of the former by the latter.

This idea has been applied most significantly to the BBC, one of the major non-market British institutions, as well as to other commercial broadcasters who have been forced to use their profits to produce programs and cater to audiences in ways specified by public authorities. It is a conception of broadcasting that is “rooted in a view of society that stresses social association and mutual obligation, and tacitly rejects the neo-liberal view of society as an aggregation of contracting and exchanging individuals” (Curran and Seaton 1991: 356).

Yet it is precisely this latter view that has come to challenge the “common good” interpretations of public interest and public service in recent years. The emergence of neo-liberalism in the early 1980s together with its associated trends towards deregulation and marketization involved a reconsideration of the definition of the public interest. Far from there being an identifiable “common good” that lay beyond the sum of individual transactions facilitated by the market, the public interest was best expressed in relation to public preferences and individual consumer choices. The public interest could now be proved and quantified using opinion polls, ratings, surveys and circulation figures—the evidence so loved by Ofcom and the FCC—and legitimized according to this data. The downside was that more subtle and broad conceptions of the public as diverse but overlapping groups of citizens have been sacrificed for a far more instrumental view of the public as customers and shareholders.

Conclusion

The idea of a Public Service Publisher may now have perished but it has left an important legacy in the debates concerning the future of public media in the U.K. Ofcom’s proposal for a PSP can be understood in many different ways: as an ingenious way of sustaining

public service content in the digital age, a bureaucratic response to a structural problem that would only have made things worse, or a flawed argument that (whatever its chance of being implemented) amplified and naturalized the current obsession with “market value” and economic language inside media policy today. While we will no longer see a PSP in the next few years, it remains clear that defenders of an expansive model of public broadcasting, in whatever country they are based, need to subject proposals from pro-market institutions to firm scrutiny. Ofcom’s plan for a PSP may at first have appeared to be an enticing prospect but, as this briefing has argued, the proposal was related to a more limited and instrumental view of public broadcasting that saw it as an adjunct of free enterprise and not as a cultural institution in its own right.

Public media proponents can use some of the arguments advanced by Ofcom’s PSP proposal to reiterate the importance of non-commercial media that speak to issues of common concern, that recognize the needs of distinct communities and that involve publics as active subjects. However, if we are to build or sustain channels that see communication, as Raymond Williams puts it, not in terms of the selling but the “sharing of human experience” (Williams 1962: 6), we will have to go far beyond the limited terms of debate proposed by Ofcom. The re-imagining of public media in a digital era will require both interventions into formal policy processes whenever opportunities arise as well as a commitment to place demands for democratic, public media at the heart of any vision of the future.

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