

'It could redefine public service broadcasting in the digital age': assessing the BBC's proposals for moving BBC Three online

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Abstract

In November 2015 the BBC Trust gave its final approval for BBC Three to cease broadcasting on television in the UK and become an online-only entity. The decision is a landmark moment in the history of BBC Television, and has significant implications for BBC planning in relation to the continued transition from broadcast television to streaming and download services. In this article the original proposals for BBC Three's move online are assessed, and are discussed within the wider context of current BBC policy. It is argued that the rationale used for moving BBC Three online is based on arguments that vary in the extent to which they are backed by evidence. It is also argued that the plans have significant regulatory implications for the future of BBC Television and for the television licence fee in the UK.

Keywords: BBC, BBC policy, BBC Three, online television, multi-platform approach, public service media, public value tests, media regulation.

‘It could redefine public service broadcasting in the digital age’: assessing the rationale for moving BBC Three online

Introduction

In March 2014 the BBC first announced that its UK television channel BBC Three, aimed at 16-34 year olds, would cease broadcast on digital terrestrial television (DTT) and on other broadcasting platforms and become an online-only entity. The move was confirmed by the BBC Trust in November 2015, with BBC Three’s final broadcast taking place in February 2016. Representing a watershed moment in the BBC’s approach to television, the current controller of BBC Three has suggested that ‘It could redefine public service broadcasting in the digital age’ (Kavanagh, 2014). This article assesses the original case that the BBC made to its regulator the BBC Trust, which alongside a public consultation formed the evidence considered in the Public Value Test (PVT) (BBC Trust, 2014a), required as the BBC was making a significant change to its one of its services.

The coherence of the BBC’s strategy is assessed in relation to BBC Three, within the context of existing BBC policy and audience research published by the UK communications regulator Ofcom, and by the BBC and the BBC Trust. Taking a communications policy analysis approach (Hansen *et al.*, 1998), a qualitative documentary analysis is employed to address the documents underpinning the BBC Trust’s decision, with a range of reports published by the BBC, the BBC Trust and Ofcom analysed. The only scholarly work-to-date on BBC Three’s move online – to this author’s knowledge – has been Doyle’s (2016) early analysis of the proposals. Doyle’s (2016) research was published before the BBC Trust’s decision was reached,

and focuses in particular on the distribution of television and the economic case for moving BBC Three online. The intention of this article is to extend analysis of the proposals by asking the following questions: to what extent does the evidence provided to the regulator in support of the proposals provide rationale for the decision reached? Is the decision to move BBC Three online as radical a decision as is being claimed? What might the impact of the decision be on the television licence fee, as people in the UK watching live TV online must still pay the licence fee?

The BBC in the digital age and the multi-platform approach

Public service broadcasters, now in most cases better termed Public Service Media (PSM) organisations, have been under continual pressure to justify their existence in the digital age almost since its outset (Steemers, 1998: 97). Marketisation, multi-channel satellite, cable television and the Internet have in part undermined the rationale for PSM, with PSM organisations facing many challenges in continuing to secure the audience reach required for their perpetuation. In this section the trends of convergence and the shift to a multi-platform approach will be discussed, as well as trends that have shaped PSM and the television sector more generally.

Convergence can refer to ‘the coming together, on account of shared use of digital technologies, of sectors and product markets that were previously seen as distinct and separate’ (Doyle, 2013a: 25), with television a medium that has been relentlessly shaped by technological convergence (Jenkins, 2004: 34). All broadcasters have been required to take account of the Internet and make changes accordingly (Gripsrud, 2010: 20). One large shift has been from linear broadcast television to the provision of

audio-visual ‘content’, endlessly reproducible across a number of platforms and endlessly available for repurposing, from long-form traditional television formats through to myriad short forms of content. As Collins (2011) argues, ‘Increasingly, television is retailed through themed, rather than mixed, channels and, to a lesser extent, video on demand (VOD)’ (Collins, 2011: 1210–1211), with recent developments in television being driven by ‘media-rich content and user take-up’ (Debrett, 2009: 819).

From short clips on Internet video sharing websites such as *YouTube* to video-looping formats such as *Vine*, public service television services such as BBC Television are under pressure to spread PSM across multiple platforms as such services increase in popularity. This has necessitated what is known in the discourse as taking a ‘360-degree approach’ to production, strategy and commissioning (Doyle, 2010: 432; Doyle, 2013a: 29; Thompson, 2006 as cited in Smith and Steemers, 2007: 50), with PSM an important part of driving the wider 360-degree concept within the UK creative industries, especially in the independent production sectors (Bennett *et al.*, 2012).

The concept of the multi-platform approach ‘refers to a strategic approach where media companies are focused on making or putting together products and services with a view towards delivery and distribution of that content proposition on not just one but across multiple platforms’ (Doyle, 2015: 51), or more simply, the term ‘*multi-platform formats* ... describes the convergence between mass media and personal media’ (Enli, 2008: 106). The necessity of adopting a multi-platform approach across much of the media sector has mainly been driven by market innovation and competition, with impacts on market organisation (Evens, 2010) and ‘an acceleration in the pace of innovation and change in the sector’ (Biggam, 2015: 89). For example,

newspapers that first made the transition to being provided online and which were mainly text-based news services have morphed into full multi-media organisations, producing video, audio and interactive content in massive quantities alongside their core news functions (Doyle, 2013b; 2015; Schlesinger and Doyle, 2015). In this process, journalists are increasingly under pressure to be multi-skilled so as to function in the newsroom (Fenton, 2010).

Away from the market and the imperatives for survival in a crowded sector, and with the rise of major new players that cross genres and forms of content – such as Amazon and Netflix, variously producing, hosting and distributing paid-for and advertiser funded content – PSM organisations have also had to adopt a multi-platform approach (Debrett, 2009). In her study, Enli (2008: 117) found that ‘multi-platform formats have the potential to strengthen the position of public service broadcasting in the age of convergence’, with Doyle (2010: 436) noting that the ‘primary concern is public value and audience welfare rather than profits and so strategic motives are more wide-ranging’.

In the case of the BBC, a multi-platform strategy allows it to attract audiences in competition with commercial broadcasters, not for market share, but for audience reach and share of viewing hours. Turning to the first point, far from the lazy-shorthand that PSM organisations do not need to worry about audiences in the way that commercial organisations do, the BBC is required through its governance framework to focus on audience reach (and is assessed on success in that area), in addition to the monitoring of audience appreciation. In addition to the ten-yearly reviews that take place in the run up to Charter Renewal, BBC policy and BBC services are continually subject to review, which fits with Debrett’s (2009: 822) argument that public service broadcasters (PSBs) face ‘new pressures for more

rigorous systems of performance measurement and accountability'. However, to the apparent chagrin of the BBC's detractors, the Corporation performs remarkably well on the audience reach measurement: for example, BBC One's '15 minute weekly reach' was 75% in 2013-14 (BBC Trust, 2014b: 12); in multi-channel homes, the BBC's overall television services had a 32.4% audience share in 2013, an increase since 2004 (29.5%), and which compares very favourably with ITV's 23.1% share (Ofcom, 2014: 191). On an individual channel basis, BBC One has a 21% audience share, which compares glaringly, for example, with Sky One's 1% audience share (Ofcom, 2014: 196).

In the history of digitisation in UK media, the BBC has played a key role in the development of DTT in the UK and the adoption of the Internet. The move from analogue broadcasting to DTT was completed in Autumn 2012, augmenting satellite and cable television provision in the UK. The BBC was required to play a leading role in the UK's digital switchover plans (since 2002) (Smith and Steemers, 2007: 43), and more generally, in the role of *Building Digital Britain* (see Iosifidis, 2007: 14). It was, however, the adding to the BBC of the Internet as a third main strand after television and radio in the 1990s – the so-called 'third great arm' of the Corporation (Brevini, 2013: 118) – that takes us to a discussion of how BBC Internet activities developed into its current online offering, to the point whereby it became a conceptual possibility for BBC Three to become online-only. Beginning with a number of 'proof of concept' websites in the mid-1990s (Thorsen, 2012: 19), the development of the BBC's online presence was on-going for some time before the use of the Internet became an official strand of the BBC's work. For example the Corporation's coverage of the 1995 financial budget, coverage of the UK's handover of Hong Kong to China,

and the death of Princess Diana all had some accompanying web presence (Thorsen, 2012: 19).

Later on 4 November 1997, BBC News Online went live (Allan and Thorsen: 2011, p.22), while BBC Online was given approval by the Secretary of State for DCMS on 28 October 1998 becoming a 'core public service' (BBC/Graf, 2004: 87). Moreover, Moe (2010: 9) notes that the Royal Charter that followed in 2006 amounted to putting 'online service on equal footing with radio and television'. Finally, the most major development from the BBC in recent years was the Christmas 2007 launch of the iPlayer, having received approval in the BBC Trust's April 2007 PVT (Brevini, 2013: 122). Thorsen (2012: 25) notes that the history of the iPlayer dated back as far as 2003, when it was known as the Integrated Media Player, and later termed the MyBBCPlayer in a 2005 speech by the then Director General Mark Thompson. Later we return to a discussion of how BBC Three's move online fits with the BBC's overall approach to the Internet and television, and the current arrangements regarding payment of the television licence fee.

Current UK trends in television viewing: on TV and online

While all kinds of claims and counter-claims surround the television viewing habits of 'young people' (BBC's Three target age range of 16-34 extends well beyond what we might conventionally term 'young'), the only reliable way to discuss this subject is with reference to empirical data. Despite this, the original announcement to move BBC Three online was met with arguments from among others, musician Jarvis Cocker, who confidently proclaimed: 'young people don't watch television' and 'It's

all about tablets for them so we shouldn't be too bothered' (Cocker as cited in BBC Newsbeat, 2014). As will be outlined, the notion that television is no longer watched by the 'young' is empirically far from correct. What follows is a summary of the relevant data that was most up-to-date at the time the BBC Three proposals were first published.

First, the vast majority of the UK population's television viewing is to television as broadcast live. In 2013, 89% of television was viewed live as compared to 90% in 2012 (BBC Trust, 2014b: 9). If the measurement is changed, to the slightly broader category of 'total time spent watching audiovisual content', 69% of viewing is to television as broadcast live for all adults (Ofcom, 2014: 106). On-demand viewing, such as through the BBC iPlayer amounts to 5% only, while what Ofcom terms 'downloaded or streamed' television (including Netflix) amounts to 3% of viewing time (Ofcom, 2014: 106).

When this is compared to the 16-24 age category, we find 50% of viewing of television as broadcast live, and 16% to recorded television; at 7% of viewing to on-demand television, younger people in this age group are only 2 percentage points higher than the general population (Ofcom, 2014: 106). The remainder of BBC Three's target age group (25-34) still consume 61% of television as broadcast live (Ofcom, 2014: 106). In both the 16-24 and 25-34 age demographics, there is a 6% share of downloaded or streamed viewing (Ofcom, 2014: 106). Overall, when the pace of change is addressed over a seven-year period in 'live versus time-shifted' viewing, 206 minutes were watched live per day in 2013 as compared to 212 in 2007, a very minor change (Ofcom, 2014: 198).

Second, watching television on a 'TV set' (so termed in the Ofcom terminology to distinguish this from the use of other devices to watch television), 'dominates total

media and communications consumption time’ (Ofcom, 2014: 54). As a ‘proportion of media and communications time’ spent on different activities, 37% of all adult’s media time is spent watching ‘TV or films on a TV set’ (Ofcom, 2014: 60). However, when addressed by age, this drops to 24% for 16-24 year olds, and 31% for 25-34 year olds (Ofcom, 2014: 60). Third, trends in viewing among 16-34 year olds requires attention. The BBC Trust (2014b) reported that for younger viewers ‘they spread their television consumption further beyond the five PSB channels, amongst a wider range of digital channels, with the five PSB channels only accounting for 42% of their viewing, compared to 53% amongst all viewers’ (BBC Trust, 2014b: 10).

BBC Three: status as a Digital Terrestrial Television channel

Since it went on air in 2003, BBC Three had been the Corporation’s core television service aimed at the older teenager/‘young’ adult audience. The channel has long been associated with creative and edgy programming, including *Bad Education*, *Being Human* and *Gavin & Stacey*. Its main entertainment offerings fell squarely within the BBC’s mission statement, upholding the historic Reithian principles of information, education and entertainment. While BBC Three’s overall budget was £86 million in 2014-15 (BBC Trust, 2014b: 2), the content budget had ‘been falling over the last two years and, as a result, there has been a decline in the hours of originations shown on the channel’ (BBC, 2015: 21). These fell from 83% in 2010 to 76% in 2013. Stemming from the 2010 freeze of the television licence fee, the *Delivering Quality First* programme of cuts that followed led to BBC Television being required to find saving of ‘annual savings of £250 million by 2016-17’ (BBC Trust, 2014b: 33). Had

BBC Three stayed on air, its budget would have been cut by more than 9% by 2016-17, from its 2014 level (BBC Trust, 2014b: 34).

As a broadcast television channel, BBC Three was broadcast from 1900-0400 each day, with a ‘mixed schedule encompassing: hourly news bulletins, current affairs, drama, entertainment, music, arts, animation and factual programming’ (BBC, 2015: 21). Its remit in its Service Licence was:

to bring younger audiences to high quality public service broadcasting through a mixed-genre schedule of innovative UK content featuring new UK talent. The channel should use the full range of digital platforms to deliver its content and to build an interactive relationship with its audience. (BBC Trust, 2014b: 1)

In detail, BBC Three was required by the BBC Trust to broadcast ‘at least 30 hours of new music and arts programmes each year’, ‘at least 100 hours of new factual programmes each year’, and ‘at least 15 hours of new current affairs programmes each year’, which in each case could include acquisitions (BBC Trust, 2014c: 4-5). Strongly performing components of these strands included BBC Three’s documentaries such as *Life and Death Row* and *Our War* (BBC, 2015: 26), the kind of programming which the BBC is required to deliver in order to meet the requirement that it ‘serve the public interest’ (DCMS, 2006a: 3.1). These quotas were either met in 2013 (current affairs programming), or surpassed (with 47 hours of new music and arts and 115 of factual programming) (BBC, 2015: 21).

As part of a wider *Service Review* of four television channels, BBC Three last had its performance reviewed in line with the BBC Trust’s RQIV (Reach, Quality, Impact,

Value) framework in 2014. In that review, the channel was found on the whole to be performing strongly. On reach, BBC Three was found to be capturing ‘26% of 16-34 year old viewers including around one million viewers who do not watch other BBC television channels’ (BBC Trust, 2014b: 14). However, ‘this has fallen and its decline has been greater amongst viewers under 55 than among those over 55’ (BBC Trust, 2014b: 14). The review also found that BBC Three’s overall Appreciation Index (the measurement used to quantify audience appreciation of BBC services) was relatively stable, albeit falling, though was higher than that for BBC One in 2013-14, and only marginally lower than that for BBC Two.

Initial proposals to make BBC Three an online-only entity

When the BBC presented its formal proposals on BBC Three to the BBC Trust (and on a number of other related changes), the proposals acknowledged cost cutting as a primary reason for the planned changes, but also highlighted the perceived necessity of reinventing BBC Three to ensure the channel remains relevant to younger audiences (BBC, 2015). A summary of the changes as originally proposed are outlined in this section:

1. It was proposed that BBC Three would become an online-only entity, and accordingly would disappear from carriers such as the main DTT platform *Freeview*; the Controller of BBC Three, Damian Kavanagh, asserted that this did not mean that BBC Three was closing (Kavanagh, 2014), and was not available for sale (1). Instead the Corporation insisted that while moving BBC Three online might change the

medium of delivery and the form of the content and that it would remain a core BBC service. By means of delivery of the newly launched channel, it was proposed that that a new BBC Three website be set up and that BBC One and the Red Button also be used for the delivery of content (BBC, 2015: 23). The new online platform would have a budget with an '80/20' divide, with the greater percentage going to full-length television programming, and the lesser to 'new form digital content' (Kavanagh, 2014).

In its initial proposals the BBC suggested that the new online platform would include alternative forms of multi-media storytelling and blog content, which the BBC has argued amounts to a 'radical change' (Kavanagh, 2014), as online budgets are normally distinct from programme making budgets at the BBC. Additional proposals published at the same time were that the DTT channel slot freed up by closing BBC Three would be redeployed to launch a 'BBC One+1' time-shifted channel; that the main children's channel CBBC would be extended by two hours per day; that the iPlayer would be 'enhanced' by '(i) premiering programmes and (ii) including selected content from third parties' (BBC, 2015: 1).

2. The BBC argued that there were three main reasons for the move online of BBC Three as part of its 'Strategic Rationale'. First, it was argued that the BBC had a falling income, given the context of the cuts to spending that the Corporation was required to make from 2010 (as discussed above). The Corporation argued that rather than cut programming budgets across the BBC's main services, that cutting one entire service from broadcast television would ensure that quality is maintained (BBC, 2015: 1). It was asserted that the move would save c£50 million per annum, with the money primarily reinvested into drama on BBC One (c£20 million), with the remainder spent on the BBC iPlayer and on the online-only BBC Three (BBC, 2015:

19). The precise content budget for BBC Three online would be c£30 million (BBC, 2015: 7). In its initial plans the BBC acknowledged that its plans were ‘largely cost neutral’ (BBC, 2015: 71), and thus more about a redistribution of licence fee money as opposed a saving in real monetary terms (albeit, the later rejected BBC One+1 proposal was being factored into the costs at this stage).

Second, the BBC suggested that there is a ‘changing TV landscape’, given ‘the emergence of global media brands offering new types of services, using new business models and investing higher levels in global genres such as drama and entertainment’ (BBC, 2015: 16). Here the BBC was referring in particular to the rise of the global VOD providers Netflix and Amazon, who ‘are forcing incumbents to consolidate across the value chain in order to compete’ (BBC, 2015: 16). The channel’s controller argued that BBC Three launched ‘before the iPhone, Facebook, SBTv, Netflix, Snapchat, driverless cars and a man jumping from space. The world’s changed and what millennials and Generation Z want and expect from the BBC has changed’ (Kavanagh, 2014).

Third, the BBC pointed to ‘Changing audience viewing habits’, epitomised by the changes in the devices in which people are viewing television on, and the manner in which they are watching it. Assessing these trends the BBC stated that its weekly reach had fallen across the period 2010-2014 on three measurements: the total reach of the BBC, BBC Television, and its specific reach to 16-34 year olds (BBC, 2015: 17). These concerns were encapsulated in comments made by the then BBC Director of Television, Danny Cohen, who asked: ‘Do we sit back as a legacy company and watch as generational change bites away at our impact or do we take a place at the forefront of that change?’ (BBC/Cohen, 2014).

BBC Trust Decision

The BBC Trust reached its decision on the outcome of the PVT in two stages. In June 2015 it announced that the proposal to add a BBC+1 service was not allowable, with the BBC Trust drawing on Ofcom's market assessment to conclude that the change 'would have the greatest adverse market impact of any of the proposals, capturing viewing share for the BBC at the expense of commercial channels and reducing the profitability, in particular, of ITV and Channel 5' (BBC Trust, 2015a: 4). At this stage the BBC Trust agreed the changes to the iPlayer and the CBBC channel. Setting out various clauses at this point before finally agreeing to the BBC Three move in November 2015, the BBC Trust's final conditions for the online-only BBC Three included: 'that all BBC Three long-form programmes must be broadcast in slots on BBC One and Two, on an ongoing basis, effective immediately on closure of the BBC Three TV channel' (BBC Trust, 2015b). BBC One and Two were also required in their service licences to 'ensure continued creative risk-taking and experimenting with new talent and ideas' (BBC Trust, 2015b), and also to produce programming specifically aimed at younger viewers.

A BBC Three 'OF the digital world'

In its main proposals for moving BBC Three online, the BBC set out that the online-only BBC Three would not be a simple streaming-online of the kind of content and schedules that previously appeared on its DTT channel. Rather, the Corporation argued that it would be reinvented as a new kind of channel: 'We need to ensure that

the new BBC Three isn't just IN the digital world, but that it is OF the digital world... This is not about picking up a TV channel (or its audience) and simply putting it online' (BBC, 2015: 23). In this section the programming approach in the proposals and how the BBC proposed it would deliver them is discussed first, followed by an assessment of the extent to which a multi-platform strategy can be discerned in the proposals.

The editorial pillars and their delivery

The BBC outlined how BBC Three's programming online would be structured around two 'editorial pillars' in its initial proposals. The first pillar, *Make Me Laugh*, is intended to extend the channel's reputation for comedy, and to focus on 'personality-led entertainment' (BBC, 2015: 24), to ensure that BBC Three will 'retain its industry position as a "go-to" commissioner for emerging talent and will continue to act as a "nursery slope" talent for BBC One and Two' (BBC, 2015: 25). *Make Me Think* is intended to 'cover drama, flagship factual, authored documents, news and current affairs' (BBC, 2015: 24–25). What has emerged at the main BBC Three website (BBC Three, 2016) (BBC Three content also appears on the main iPlayer website and mobile applications) is a mixed offering of full-length programmes, short video clips, and articles authored for BBC Three. A 'What's new this week on BBC Three?' and the 'Daily Drop' section provide the equivalent of a schedule for a broadcast channel, planned to fulfill the original claim that 'it will be important to have a curated content offering that is refreshed frequently so that the new BBC Three is a dynamic and lively service rather than a static library of content' (BBC, 2015: 28).

We saw above how the BBC wants to ensure that the online-only BBC Three ‘is OF the digital world’ (BBC, 2015: 23). However, the Corporation went further at the time by suggesting that the ‘new BBC Three could be the arrowhead for the whole industry - shaping and extending the “TV” market beyond linear and building demand for new forms of content’ (Kavanagh, 2014). Elsewhere it was suggested that the new online-only BBC Three would provide ‘an opportunity for BBC Management to test and understand how public service broadcasting can and should evolve in a digital world’ (BBC, 2015: 22) within the present Charter period. The notion here is that the online-only BBC Three might serve as a blueprint for future changes to the remainder of the BBC’s television channels.

A multi-platform strategy for BBC Three: ‘members...not passive consumers’

The multi-platform approach has been prevalent in PSM, as previously discussed. In terms of how the online-only BBC Three might engage young audience members under the proposals, the BBC Director General Tony Hall stated:

the new BBC Three will be a great example of how we can reinvent the public service for the digital world - using their talent, appearing on the platforms and devices that they use and talking to them as equals and partners. (BBC, 2014a)

In this comment we can see encapsulated a clear emphasis in the BBC’s plans in relation to its multi-platforming approach – or as described elsewhere by the BBC, a

‘Multi-platform presence’ (BBC, 2014b: 6) – as a means of securing audience engagement with those increasingly consuming media online. Previously, there had been a move away from the term multiplatform at the BBC (Doyle, 2016: 696). However, the BBC plans to continue to utilise and expand on its presence on other Internet platforms for the online-only BBC Three, such as on *Youtube*, *Facebook*, *Twitter*, *Instagram* and *Tumblr*, with *Buzzfeed* a potential for the publication of ‘listicles’ (BBC, 2015: 32–34). In so doing, the Corporation is seeking to cover the major Social Networking Service (SNS) platforms. In addition, Kavanagh notes that the strategy would also extend to person-to-person services, such as Snapchat and WhatsApp (Kavanagh, 2015).

The theme of participation through a multi-platform approach fits with the BBC’s wider approach to the online-only BBC Three, with Kavanagh arguing that the changes to BBC would bring about a change in the status of the audience. On this Kavanagh suggested that bringing viewers into a new relationship with the Corporation can be achieved: ‘By fostering a more open relationship through new platforms and social media our audience would become members of new BBC Three, not passive consumers’ (Kavanagh, 2014). The plans to use a more extensive multi-platform approach fits with the use in BBC policy discourse of the term ‘BBC AV content’ (eg. BBC, 2015: 62). While the usage of ‘BBC content’ has been commonplace for some time, it is usually used to refer to ‘content’ in its more traditional usage, eg. some material produced by the organisation. Here we see the adoption of the word in its market usage, more common in the commercial media environment.

Previously the BBC commonly used ‘programming’ to describe what now becomes ‘AV content’. However, present in these proposals is the idea that a multi-platform

approach may also flow in the other direction, from BBC Three online back to the Corporation's main channels. The intention that new BBC Three 'long-form' programmes would also be shown on BBC One and BBC Two (BBC, 2015: 23) was ratified in the BBC Trust's decision on the proposals, with the condition that this would apply to all long-form programmes (BBC Trust, 2015b). Thus the channel controller framed this by saying, 'In reality new BBC Three programmes will be available to more people, and seen by a wider audience, than they are now' (Kavanagh, 2015).

Audience, market and regulatory implications

While we have already addressed how BBC Three has been structured and delivered as a nascent online-only entity, it is necessary to consider the audience, market and regulatory implications of the move. First, in relation to the impact on the audience, the BBC Trust commissioned media consultants Communications Chambers (CC) to carry out research on the proposals. In its quantitative research, CC found that of the four proposals it surveyed on (BBC Three, BBC+1, CBBC, iPlayer) that the BBC Three proposal 'was the least popular of the four propositions, both at a personal and societal level' (BBC/Communications Chambers, 2014: 4), finding 32% of people unfavourable towards the proposals for the channel at the personal level (BBC/Communications Chambers, 2014: 6). CC also found that '29% of respondents thought they would use the revised service at least monthly' compared to the then monthly channel reach of 64% (BBC/Communications Chambers, 2014: 4).

Second, in relation to market impact, CC modelled what the likely impact would be on the wider broadcasting market. It addressed how the changes would affect the

BBC's share of television viewing and what the impact on the commercial channels was likely to be. CC found that as BBC Three's 1.5% viewing share of broadcast television would cease, the total loss for BBC Television's share of viewing hours by 2017 would be -2.66% (BBC/Communications Chambers, 2015: 24). For the following commercial channels, the impact on share of viewing hours would be: +1.33% (ITV); +1.59% (Channel 4); +1.35% (Channel 5) (BBC/Communications Chambers, 2015: 24). Thus, while the move would result in a smaller share of viewing for the BBC, the main commercial channels would all be beneficiaries.

Third, in relation to the regulatory implications of the BBC Three move, the BBC outlined the following assumption in its PVT submission materials that as 'a new online service, BBC Three long form programmes would not be subject to the current television quota framework but would be subject to our voluntary online external spend quota' (BBC, 2015: 35). Some background is needed to give context here: the 'BBC is accountable for a number of public commitments each year, including programming and production quotas, service licence commitments, and promises made as part of its Statements of Programming Policy' (BBC, 2014b: i). The framework for this lies in the BBC's Agreement (DCMS, 2006b), which sets out the parameters for the 'programming quotas for original productions' (section 49). Crucially this applies only to the *UK Public Television Services*, which is presumably why the BBC has considered the online-only BBC Three to be exempt. In the 2013-14 period, the most recent published figures available, BBC Three had a quota of 70% of original productions, which it surpassed by delivering 76% (BBC, 2014b: 2). While the BBC noted that absence of the current television quota framework from the online-only BBC Three should be reviewed after a period of two years, it was

somewhat remarkable that it is not expanded on in the context of a 90-page report given the importance of this point.

Discussion

In this section we return to the questions asked above: to what extent does the evidence provided to the regulator in support of the proposals provide rationale for the decision reached? Is the decision to move BBC Three online as radical a decision as is being claimed? What might the impact of the decision be on the television licence fee, as people in the UK watching live TV online must still pay the licence fee?

Assessing the BBC's rationale for the BBC Three proposals

Of the three main arguments offered by the BBC for the proposals – falling income, a changing television landscape, and changing trends in television viewing – it is argued here that the falling income argument is the one most backed up by the evidence considered, followed by the changing trends argument. In contrast, it is argued that the changing television landscape is comparatively much weaker. First, on the *falling income* argument, that the BBC's financial outlook is becoming more difficult is without dispute. In July 2015, some time after the BBC Trust's review began, the Corporation was handed a licence fee settlement by the government in which the BBC was required to take on the funding of free television licences for the over-75s. This has meant that licence fee income for the BBC could fall from £3.7

billion to £3.1 billion, meaning the debate continues over how the remaining funds should be divided. The BBC argued that cutting one channel from broadcast television was essential rather than choosing ‘to further ‘salami slice’ the budgets of our other services’ (BBC, 2015: 77). However, because the BBC has sold the idea of an online-only BBC Three as a positive step it can now be forced by its detractors into accepting that it can deliver similar levels of content despite making substantial changes to its services (in this case BBC Three as a broadcast television service). In other words, the BBC has shown that it can deal with a lower overall budget without a noticeable drop off in content, which could perhaps be a harbinger of more budget cuts. Moreover, for the BBC’s detractors, the argument could accordingly run that if you can deliver similar content for less, then more channels could be moved online and funding for the BBC further diminished.

Second, the *changing trends in television viewing* argument is perhaps the next strongest argument as backed up by the evidence. The quantifiable changing viewing habits among the young, especially in the 16-24 demographic of BBC Three’s wider target audience, cannot be ignored. While we have viewed them as they stand, who can predict what another five to ten years of social change and technological innovation will bring? However, as outlined in a previous section, the viewing of broadcast television viewed as live in the UK dominates all television consumption and audiovisual consumption. The fact that the BBC has been required by the BBC Trust to broadcast all long-form BBC Three programmes on BBC One and Two mitigates against being online-only, as much of the audience (even among the young) still consumes television on DTT. Here Danny Cohen’s June 2015 comments are relevant, when he suggested that BBC Four could possibly follow suit after BBC Three in moving to be online-only (Martinson, 2015), although doubt was later cast

on this (2). This certainly shows some incoherence in the BBC's argument: if there is a phased transition online of those channels that are most watched by the young, then the next channel to move would not be BBC Four, with a much older audience (more logically the CBBC channel would move online). Thus, the changing trends argument loses traction if it is not followed logically in the future by beginning with those channels with a younger viewership.

Third, the *changing television landscape* argument is the weakest that the Corporation forwarded for moving BBC Three online, and is the one that the BBC provides the least evidence to support. The rise of Netflix and the Amazon VOD services, replete with originally commissioned content, are primarily a threat to the commercial broadcasters and their online offerings. While stating 'the competitive environment for BBC iPlayer is set to become significantly more challenging as major global VOD providers ... establish a foothold in the market' (BBC, 2015: 45), the BBC fails to follow the logic of the argument. Here the primary competition is between those companies offering subscription services, with the non-subscription but rather licence fee funded BBC iPlayer falling outside of this.

However, even when the issue is examined empirically, the argument still appears weak: as shown above, at the time the category that included providers such as Netflix only has a 6% viewing share among the 16-34 age demographic, of those accessing paid-for services, whereas television viewed live had a 50% (16-24) and 61% share (25-34) (Ofcom, 2014: 106). When the category that the iPlayer falls into is added, these shares are 57% and 67% respectively (Ofcom, 2014: 106). Among the BBC Three target audience, paid-for streamed services are still a minority pursuit (3). While such an argument is one which might form a useful part of an overall discussion on changes in the television marketplace, these are changes that the BBC is

currently negotiating successfully and thus it does not need to rely on weaker arguments, as has been the case here.

How radical are the proposals?

The BBC suggested in its initial proposals that the plans for BBC Three amounted to a radical departure, and to draw on the title of this article that they might *redefine public service broadcasting in the digital age*. In this section it will be argued that they are indeed radical. The point previously discussed, that the BBC is working under the assumption that the original productions quota would not be applied to BBC Three as an online-only entity sets a very interesting precedent, and yet is one which could radically alter how PSM in the UK is framed. The BBC Trust did not fully deal with this matter in its initial published decision, only referring to the matter in relation to the final period of linear broadcast, and apparently referring to it in relation to how the quotas affected the forecasting necessary for measuring impact of the channel ceasing broadcast (BBC Trust, 2015c: 103; 118).

Until further clarification is brought to bear upon this, it appears as a ground-breaking proposal, and very illuminating both on this case and for the future of the BBC. As an important plank in the BBC's governance, which in addition to a raft of other regulations help demarcate it from commercial television, the quotas and the extent to which the BBC exceeds them offers an important argument for PSM (BBC, 2014b: 2). With the original productions quota missing from BBC Three, the rationale for it existing as a key PSM offering is harder to make. While the online-only BBC Three would still be required to contribute to the Corporation's public purposes

(BBC, 2015: 46) (4), the argument that BBC Three can stand alone from other competitors on this particular measurement is lost.

If the online-only BBC Three is to be outside of production quotas, will the same go for other television channels moved online at a later date? As noted above, BBC Four could potentially move online also: would it also be exempt from the original productions quotas? If all BBC Television channels eventually go online-only, but the BBC is to keep its production quotas, then why allow BBC Three from the outset to avoid this requirement? While the Corporation notes, ‘given the experimental nature of BBC Three online, we would suggest a review after two years’ (BBC, 2015: 35), there is a strong likelihood that this could set a precedent. The new BBC board – announced in the White Paper for Charter Renewal in 2016 (DCMS, 2016) – must set an overall plan for how it intends to deal with television channels and their move online, with Ofcom as the BBC’s incoming regulator giving its view. Rather than taking a piecemeal approach – BBC Three now, BBC four later, possibly followed by BBC Parliament and later the BBC News channel – the Corporation must make an overall case for delivery of television online. The failure to do so could concede further ground to those who are vociferously arguing for the dramatic cutting back of the BBC. However, this wider argument needs framed within a discussion of the future of the licence fee, to which we turn now.

The implications for the television licence fee

Television licence fee payers in the UK have for some time been required to pay for services outside of television and radio. There has therefore been a disconnect for

many years between the licence fee and its exclusive use to fund broadcast media. As discussed above, the BBC began developing its online services in the 1990s, later becoming a core public service. The 2006 Royal Charter (DCMS, 2006a) cemented the position of BBC Online. However, BBC Online's budget of (£174 million) is a fraction of the money spent on BBC One (13.3%) (BBC, 2014c: 5); for example, the total BBC Online budget represents only 5% of the licence fee, compared to BBC Television's 66% (BBC, 2014c: 5).

While licence fee payers who do not use online services may have become used to these arrangements, it is a seismic shift to divert a part of the television budget to become provided online-only, especially when it may not be subject to the same regulatory requirements. There is direct correlation here with the plans to focus strongly on a multi-platform approach, as discussed above, with BBC Three being an online-only entity. The funding for BBC Three, out of the television budget, will see increasing amounts of that money spent on content additional even to the channel's main website for distribution. Those paying the television licence (in its present form) and without an Internet connection, will find ever more content lying outside of what they can access.

The continued clause whereby users of BBC Television online – through the current live streaming of the Corporation's channels – need to purchase a television licence, while those who only use catch-up services do not, is of current importance in the debate surrounding the proposed changes to BBC Three. The loophole that allows for internet catch-up without paying a television licence is problematic for the future funding of the Corporation. This issue has been discussed over the ten past years or so (Cooper, 2007), while the July 2015 licence fee settlement (DCMS, 2015) and the White Paper for Charter Renewal (DCMS, 2016) committed the government to

introducing legislation to close the loophole. However, the White Paper leaves the question of how the matter of licence fee enforcement will be conducted with regards to the iPlayer open, stating rather equivocally that ‘The government will discuss verification and other options with the BBC and look at the best way of implementing this, including through regulations if needed’ (DCMS, 2016: 95).

Finally, there is a point to be made on the age demographics involved in these BBC Three proposals. The age demographic that the channel covers (16-34), includes that group which are most likely to begin paying for their own licence fee when they first move out of home. This group, on the whole, will not have been responsible for paying the licence fee when living with parents or guardians below the age of 16. Following BBC Three’s move online, this group may become ever more used to the lack of a requirement to pay for a licence fee to access BBC services. While there are a few other clauses to consider – such as the possible demise of the fee itself, and the fact that people in this age demographic still access many other BBC Television services – it nevertheless may lead to a cultural change among younger BBC users.

Conclusion

In their large scale study, Bennett *et al.* (2012: 51) found in some of their interviews with practitioners across the independent production sector the view that ‘the emphasis on iPlayer by the BBC views the internet as “just a bunch of pipes for delivering telly through”’, with ‘a feeling that the Corporation will lose creative innovation and leadership in multiplatform PSB content’. This insightful comment raises a similar question for the BBC Three proposals: can the BBC make good on its

commitment to not simply pick ‘up a TV channel (or its audience) [by] putting it online’ (BBC, 2015: 23)? As has been argued in this article, the issues that are raised through these proposals need to be set into the context of a wider digital strategy for the BBC, covering the next Charter period (an eleven year Charter, from the beginning of 2017 to the beginning of 2028). While the government has staked out its approach to the Corporation in the White Paper (DCMS, 2016), it is now up to the BBC to outline how it will proceed. Moreover, the making of changes to services (such as in the case of BBC Three) must be accompanied by a much clearer rationale if the BBC wants to defend its role while under pressure from its myriad critics. As has been argued here, one of the three main arguments that the BBC offered to support the BBC Three move online was rather weak, showing a timidity on the part of the Corporation in overextending the threat of actors like Netflix to its own position as a leading PSM organisation.

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Notes

(1) This stemmed from a proposal from Jimmy Mulville and Jon Thoday of the independent production companies Avalon and Hat Trick to buy the channel, and to secure its future as a broadcast channel. This idea went as far as the authorship of a thirteen-page proposal (Midgely, 2015).

(2) In September 2015 the BBC's Director of Strategy and Digital stated, 'We are not ruling anything in or out, but we don't have a plan to close BBC4' (Plunkett, 2015) seemingly dampening Cohen's previous point.

(3) One inconsistency in the presentation of data in the Communications Market Report (Ofcom, 2014) is that while in one place (Ofcom, 2014: 106) on-demand and catch-up services (including the iPlayer) and downloaded or streamed (paid-for services, including Netflix) are kept separate, in another place they are conflated (Ofcom, 2014: 145). Despite this, even on the second measurement, the BBC iPlayer still dominates usage, gaining 38% use in 2014, against 14% for Netflix and 6% for Amazon's video service.

(4) The White Paper for Royal Charter renewal shows that the BBC's previous six public purposes are to become a rewritten set of five (DCMS, 2016: 31).

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