

Communications Consumer Panel and ACOD's response to Ofcom's consultation on Public Service Content in a Connected Society (review of public service broadcasting)

Introduction

The Communications Consumer Panel (the Panel) and the Advisory Committee for Older and Disabled People (ACOD) welcomes this opportunity to respond to Ofcom's consultation on Public Service Content in a Connected Society.

The Panel works to protect and promote people's interests in the communications sector. We are an independent body set up under the Communications Act 2003. The Panel carries out research, provides advice and encourages Ofcom, government, the EU, industry and others to look at issues through the eyes of consumers, citizens and micro businesses. The Panel pays particular attention to the needs of older people and people with disabilities, the needs of people in rural areas and people on low incomes, and the needs of micro businesses, which have many of the same problems as individual consumers. There are four members of the Panel who represent the interests of consumers in England, Northern Ireland, Scotland and Wales respectively. They liaise with the key stakeholders in the Nations to understand the perspectives of consumers in all parts of the UK and input these perspectives to the Panel's consideration of issues.

There is also cross-membership with ACOD. This means that members, in their ACOD capacity, provide advice to Ofcom on issues relating to older and disabled people including television, radio and other content on services regulated by Ofcom as well as about issues concerning the postal sector.

The Panel is an independent policy advisory body on consumer interests in telecommunications, broadcasting and spectrum markets but with the exception of content issues. ACOD's remit, on behalf of the constituency that it represents, includes providing specific advice on matters relating to television, radio and other content made available via services regulated by Ofcom. The following response reflects that distinction between the remits of the two bodies.

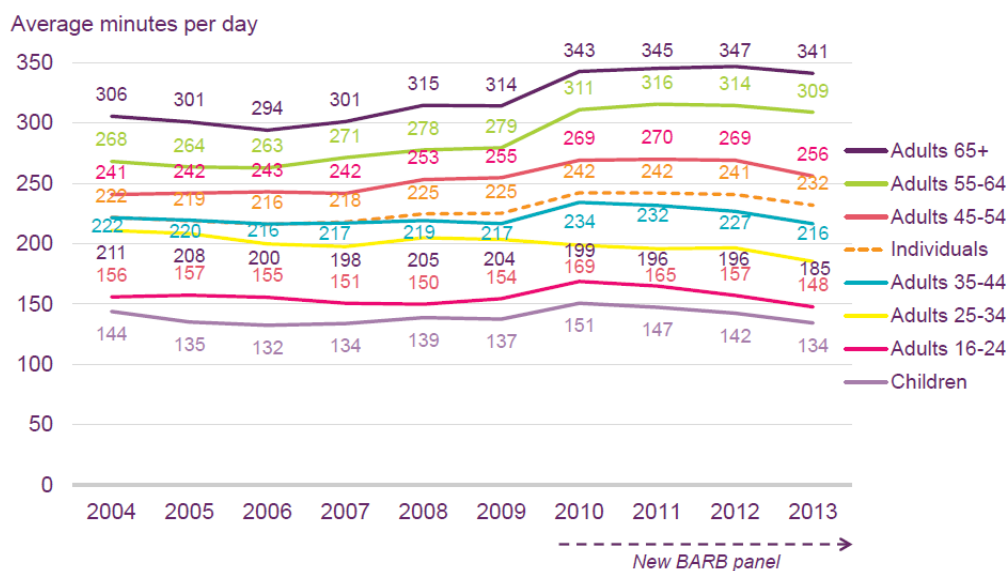
Response

Content preferences

As noted in the last census, the population of the UK aged 65 and over was 11.1 million (17.4% of the UK population) in mid-2013. The number of people in this age group is growing and has increased by 17.3% since 2003.

In terms of public service broadcasting (PSB), we note that the Ipsos MORI research highlights that PSB remains very important to older consumers, who often use PSB channels as background content or as company. Older people watch more TV than any other group. As illustrated in the chart below, people aged 65+ on average watch television for 341 minutes daily. It is also worth noting that older people's levels of television viewing have remained much more constant between 2010 and 2013 than the general population. Whilst there has been a decrease of 10 minutes (-4.3%) in all individuals' TV viewing per day between 2010 and 2013, the decrease is much less marked amongst older people: a decrease of two minutes per day (-0.7%) amongst 55-64 year olds and a decrease of two minutes (-0.5%) amongst those aged over 65. It is, we believe, reasonable to expect this situation to endure and the needs and expectations of the older audience should be taken fully into account when considering the content of Public Service Broadcasting.

Figure 8: average minutes of daily TV viewing, all channels, by age, 2004-2013



Source: BARB, Network

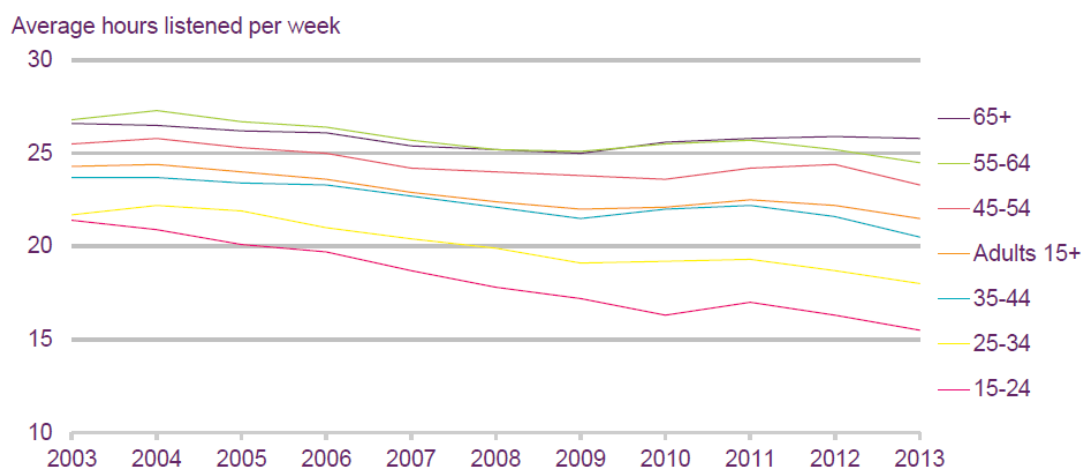
Note: new BARB panel introduced 1 Jan 2010; as a result pre- and post-panel change data must be treated with caution

The Ipsos MORI research highlighted that, in contrast to younger participants, TV remains the most important source for relaxing and entertainment for 'traditionalists' aged 55+, though they increasingly appreciate the role of the internet for society as a whole. Older traditionalists (65-74s) are the group most likely to want to see a range of programming on

the main channels. This group remains highly reliant on TV listings and there is an outright preference for a world which broadcasts scheduled TV only, with some concerned about the negative impact of online services on other members of society.

The research noted that the average weekly reach of radio remains high among all ages and, although the amount of time spent listening amongst all adults has fallen, levels amongst older people again remain more consistent with previous years. The proportion of total 'audio listening time' spent with radio is also much higher amongst older people - at 86% amongst those aged 65+.

Figure 13: Weekly radio listening hours, by age group: 2003-2013



Source: RAJAR

Note: average weekly listening per listener

We note that the audience research suggests older audiences in Scotland, Wales and Northern Ireland feel that more could be done to ensure that programmes reflect their local and national identities. Taking into account information relating to the supply side of content, this could suggest that such attitudes are not necessarily just the result of a generation gap but also a potential gap in provision.

The 2011 census found that the proportion of people in Wales able to speak Welsh increases gradually by age from those aged 45-49, reaching 19.1 per cent for the over 85s¹. We are concerned that there is a paucity of alternative Welsh language sources of national and international news other than the BBC Cymru and S4C provision. It is particularly important that these Welsh news services are available for older Welsh-speaking consumers. We feel it is also important that BBC Alba has a prominent place in the EPG.

We would stress that the participation of older and disabled people in programmes, and their accurate portrayal are central pillars to maintaining audiences' confidence and engagement with broadcast content.

¹ <http://gov.wales/docs/statistics/2012/121211sb1182012en.pdf>

Accessibility

Given the higher levels of television viewing amongst older and disabled people, in addition to the appeal of PSB content, it is extremely important that the Public Service Broadcasters provide excellent levels of accessibility -in its broadest sense - to content to ensure that, as far as practicable, users can enjoy equivalent access.

Device use, applications and services and infrastructure

As the consultation notes, broadband penetration now stands at 80% of all households, and over a quarter of all fixed broadband connections are now superfast. 4G mobile services were launched in 2012 and are now available from all four national mobile network operators (MNOs), allowing faster access to internet-delivered content on the move. The consultation states that as a result of this improvement in connectivity, new devices such as smartphones, tablets, smart TVs and broadband-connected set-top boxes have all achieved high levels of take-up.

The Ipsos MORI research has highlighted however that many older people continue to watch television exclusively on a TV set. As much research shows, not everyone has internet access nor does everyone go online, and this is more likely amongst older and disabled people. Indeed, the consultation notes that while 82% of UK adults have internet access at home, this drops to 50% among those aged 65+. Ofcom's 2013 report *Disabled consumers' ownership of communications services*² found that personal internet access anywhere for disabled people aged 65+ who lived in a lower income household was 23%.

We note that smartphone ownership also differs greatly by age. As the consultation notes, almost nine in ten (88%) 16-24s own a smartphone, compared to 14% among those aged 65 and over.

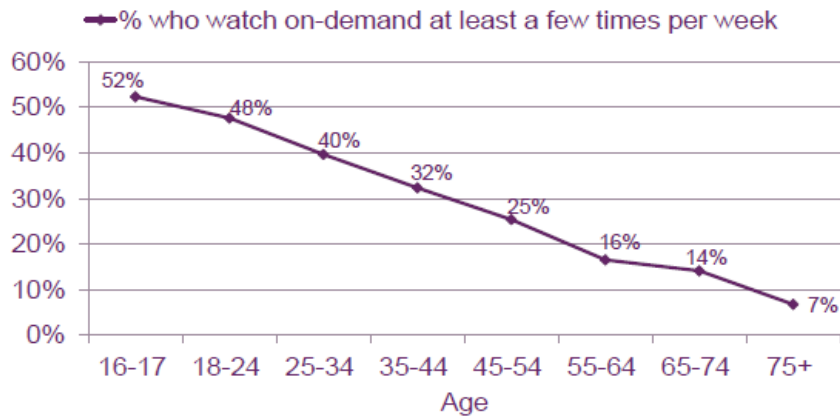
In addition, the Ipsos MORI research highlighted that far fewer older people have used a website or app provided alongside TV programmes than the general population. Whilst iPlayer is the best known and most widely used catch-up or on demand service amongst the traditionalists group, there was some confusion as some people thought iPlayer is the main catch-up/on demand service; and some thought it was the only catch-up provider available.

The Panel would therefore encourage the development of an open-standard catch-up/on-demand player which would avoid consumers having to learn a number of different interfaces, with varying degrees of accessibility.

We note that others in the research had no desire to use on demand or catch up services. While some in this group were familiar with time-shifted viewing, few were used to accessing content whenever they wanted it. This variance by age is illustrated in the chart below.

² http://stakeholders.ofcom.org.uk/binaries/research/telecoms-research/disabled/Disabled_consumers_report.pdf

Figure 3.3 – Percentages of viewers, by age, who use on-demand services frequently



Source: Question TO12.

Base: All respondents (2,026) Interviews with 2,026 UK adults aged 16+, July – Aug 2014

Q: How often, if at all, do you watch television programmes of films online through an 'on-demand' service?

We also note that patterns of news consumption vary significantly by age. Six in ten (60%) of 16-24s say they use the internet for news, compared to 21% of those aged 55+. Ninety per cent of those over 55 say they watch news on TV, compared to 56% of 16-24s.

In term of infrastructure capability, broadband speeds are variable across the UK, with an estimated 3% of UK households unable to receive even 2mbps. In our view, access to services such as catch up and VOD is dependent on a good broadband service, certainly greater than 2mbps and probably more in the region of 10mbps.

Furthermore, although 4G has brought significantly higher mobile internet speeds to some areas of the country, other areas still struggle to receive a 2G voice signal.

Future delivery

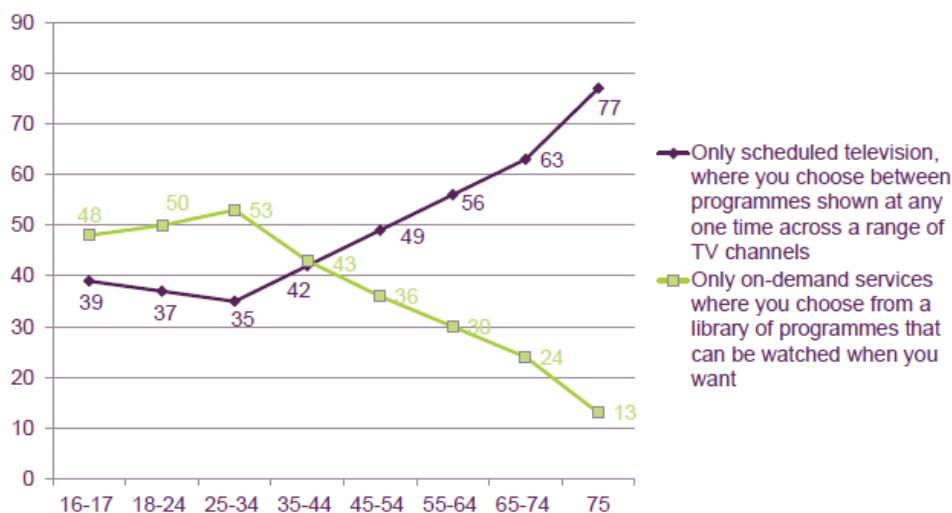
We recognise that, as outlined in the consultation, the generation gap between younger and older audiences appears to be getting wider, with significant differences in opinion, attitude and habits towards PSB and television more generally. While younger audiences have always watched less television than older audiences, the audience research suggests that the 'connected generation' are watching increasingly less television, and that they may be taking these habits with them as they age.

However, for the reasons expressed above, we currently have some concerns about the question of whether the PSB remit could be increasingly delivered as catchup content across a portfolio of channels in future.

We note that the Ipsos MORI research highlighted that, for traditionalists, moving PSB to on-demand would at best be seen as an inconvenience, while others felt they would miss out entirely as they did not have the ability to access on demand content (and had little interest in doing so).

The charts below illustrate the clear preference amongst older people for scheduled television, as opposed to on-demand content. This preference is even more pronounced in the case of news programming.

Figure 7.5 – Preferences for on demand or scheduled content: by age

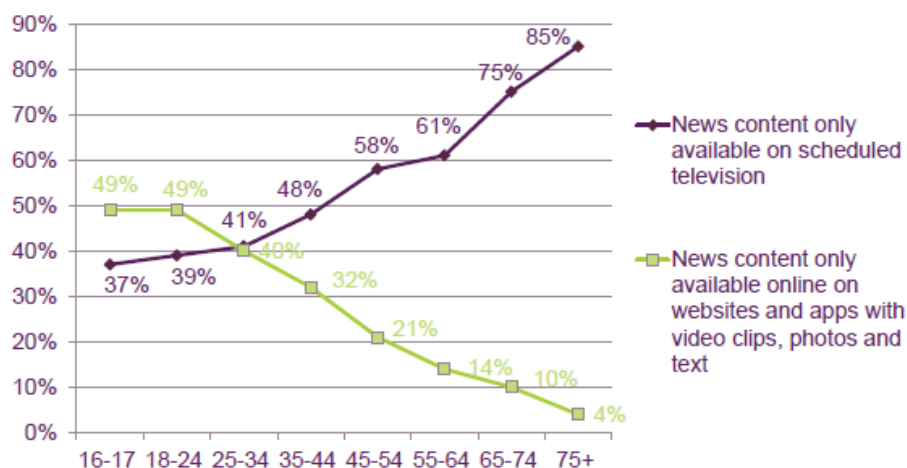


Source: Question HCP2.

Base: All respondents (2,026) Interviews with 2,026 UK adults aged 16+, July – Aug 2014

Q: What would you most like to see?

Figure 7.6 – Preferences for on demand or scheduled news content: by age



Source: Question HCP4.

Base: All respondents (2,026) Interviews with 2,026 UK adults aged 16+, July – Aug 2014

Q: What would you most like to see?

The research and consultation draw attention to the fact that, although across the population generally many people feel comfortable with the idea of accessing content in new ways (such as on demand and additional online content), there was a concern that “older or more vulnerable people” might lose access to content because it is increasingly available only online. Age and/or disability does not necessarily confer vulnerability but, as has been seen, older and disabled people most rely on traditional TV viewing and are

most likely to experience detriment if access to high quality PSB content becomes less easy. This concern extends to harder-to-reach groups such as rural communities with limited access to broadband, where everyone is disadvantaged, irrespective of age.

We noted that the research highlighted a perception among the more technologically aware that services relying on an internet connection may be less reliable - for example, because of patchy connections; and that even those with access to an internet connection may simply not want to make use of these services because they like the routine of watching the television.

We would stress however that any PSB on-demand or catchup services should be subject to the same standards, especially in terms of accessibility, as the linear channels.

Finally, as policy-makers consider new ways of delivery of PSB content, we would suggest that it is also important to bear in mind the type of legacy equipment people own, in addition to the type of broadband contract they have - i.e. any limits on download content that may apply.

Summary

The consultation asks whether universal availability and easy discovery of PSB remain important. The answer is unequivocally yes. Members of the audience, and particularly older and disabled people should be able to have access to content by their preferred method; and they should have equal opportunity to consume a range of high quality content, with no barriers to enjoying PSB.

- The number of people in the UK aged 65 and over is growing.
- PSB remains very important to older consumers, who often use PSB channels as background content or as company. Older people watch more TV than any other group.
- The needs and expectations of the older audience should be taken fully into account when considering the content of Public Service Broadcasting.
- The participation of older and disabled people in programmes, and their accurate portrayal are central pillars to maintaining audiences' confidence and engagement with broadcast content.
- It is extremely important that the Public Service Broadcasters provide excellent levels of accessibility -in its broadest sense - to content to ensure that, as far as practicable, users can enjoy equivalent access.
- The Ipsos MORI research has highlighted however that many older people continue to watch television exclusively on a TV set. Not everyone has internet access nor does everyone go online, and this is more likely amongst older and disabled people.

- The Panel would encourage the development of an open-standard catch-up/on-demand player which would avoid consumers having to learn a number of different interfaces, with varying degrees of accessibility.
- In term of infrastructure capability, broadband speeds are variable across the UK, with an estimated 3% of UK households unable to receive even 2mbps. Access to services such as catch up and VOD is dependent on a good broadband service.
- We have some concerns about whether the PSB remit could be increasingly delivered as catchup content across a portfolio of channels in future.
- Age and/or disability does not necessarily confer vulnerability but, as has been seen, older and disabled people most rely on traditional TV viewing and are most likely to experience detriment if access to high quality PSB content becomes less easy.
- This concern extends to harder-to-reach groups such as rural communities with limited access to broadband, where everyone is disadvantaged, irrespective of age.
- It is also important to bear in mind the type of legacy equipment people own, in addition to the type of broadband contract they have - i.e. any limits on download content that may apply.