DCMS Media Green Paper Consultation – A Guide to Responding

5 July 2026

You can response by clicking the links under the heading **Ways to Respond** on the below web page.

https://www.gov.uk/government/consultations/watch-this-space-a-new-strategic-direction-for-uk-media-green-paper-and-public-consultation

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General Guidance

Don't waste this opportunity

The Government's **Watch This Space** Green Paper is one of the most important media consultations in years.

On the surface it appears to ask straightforward questions about television, streaming services and the future of broadcasting. However, buried within it are proposals that could influence:

- freedom of expression;
- government involvement in determining "trustworthy" news;
- prominence of approved media organisations;
- the future of terrestrial television;
- Public Service Media reform;
- regulation of online platforms.

This consultation deserves careful responses from anyone who values free speech, viewpoint diversity and independent media.

Read every question carefully

One thing became apparent as I completed the consultation.

Many questions contain assumptions.

For example, several questions ask **how** government should promote "trustworthy" news, rather than asking whether government should be deciding that question at all.

Likewise, some questions ask when prominence measures should apply, or whether users should be able to switch them off, while never asking whether such prominence measures should exist in the first place.

Where a question contains an assumption you disagree with, resist the temptation simply to answer emotionally.

Instead:

- answer honestly;
- use "Not sure" where the assumptions cannot be accepted;
- explain your reasoning in the free-text boxes.

Freedom of expression matters

The greatest safeguard against misinformation is not government-approved information.

It is:

- open debate;
- competing viewpoints;
- transparent evidence;
- critical thinking;
- media literacy.

Government should help citizens evaluate competing claims, not decide which opinions deserve algorithmic promotion.

There is an important distinction between:

> *helping people think*

and

> *telling people what to think.*

Public Service Media should earn public trust

Public Service Media has an important role.

That does **not** mean existing institutions should receive permanent regulatory advantages simply because they have always existed.

Support should follow:

- public value;
- quality journalism;
- educational content;
- cultural contribution;
- universal access.

Not institutional privilege.

The future of television

Moving towards IPTV may ultimately be inevitable.

However:

- nobody should lose access to television because they cannot afford broadband;
- emergency broadcasting must remain reliable;
- elderly and disabled viewers must not be left behind;
- resilience should be demonstrated before terrestrial broadcasting is switched off.

Technology should serve citizens—not the other way around.

Beware of leading questions

Several consultation questions are framed in a way that encourages respondents to accept the Government's underlying assumptions.

For example:

> *Should trustworthy news receive greater prominence?*

A more fundamental question would be:

> *Who decides what counts as trustworthy?*

That question is largely absent.

Whenever a consultation assumes agreement with a proposal, make use of any accompanying text box to explain where you disagree with the premise.

Think strategically

Consultations are not opinion polls.

Officials often analyse:

- written comments;
- recurring themes;
- evidence provided;
- practical concerns.

A well-reasoned explanation is generally more valuable than an emotional response.

Avoid slogans.

Explain principles.

Support your arguments.

My guiding principles

Throughout my response I tried to remain consistent.

I support:

- freedom of expression;
- viewpoint diversity;
- media plurality;
- politically neutral regulation;
- universal access to broadcasting;
- technological innovation;
- competition based on merit rather than institutional privilege.

I oppose:

- government deciding which lawful opinions deserve promotion;
- algorithmic favouritism based on political definitions of “trust”;
- regulation that entrenches incumbent broadcasters;
- transitions that disadvantage vulnerable viewers.

Final thoughts

This consultation is about much more than television.

It touches on who controls information, how citizens discover news, and whether future governments should have greater influence over the media environment.

Whatever your political views, I encourage everyone to read the Green Paper for themselves and submit a considered response.

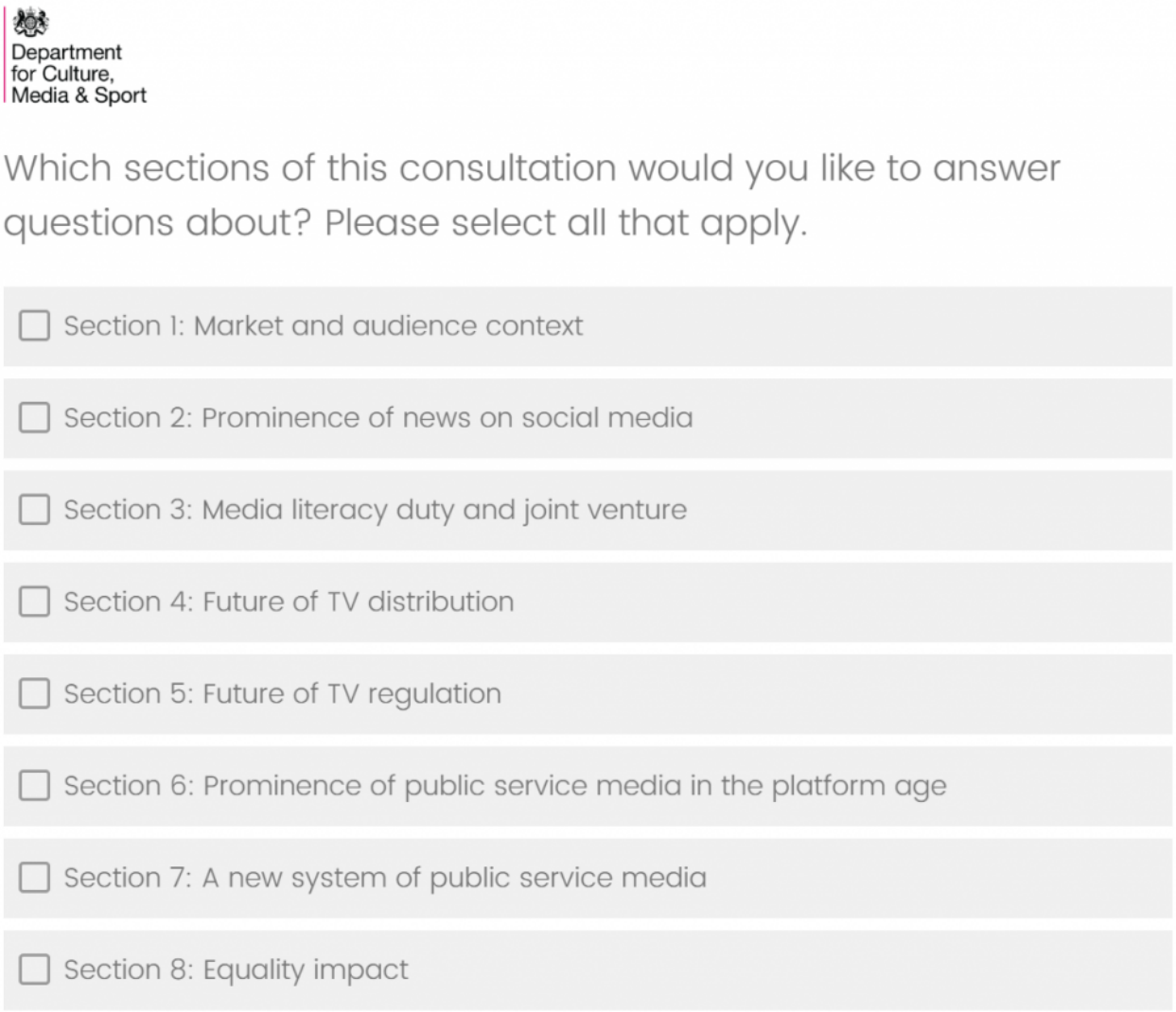
Democracy works best when governments hear from informed citizens—not just organised interest groups.

My Responses to the Questionnaire

The first 10 questions are about you:

1. In what capacity are you responding?
2. Your age
3. Your sex
4. Your gender
5. Your National identity
6. Your region or nation
7. Your ethnic group
8. Do you have any physical or mental health conditions?
9. If yes, does you condition hinder you
10. What is your highest level of education?

Question 11



My answer:

I ticked all sections.

If you don’t tick all of them as I did, you’ll get fewer questions and therefore my question numbering here won’t apply.

Question 12



The green paper covers topics relating to the Future of UK Television and Media. More specifically, it includes content on:

- The current market and audience context
- Prominence of news and of public service media
- Future of TV distribution and regulation
- A new system for public service media
- Media literacy

What are your overall views on the future of television and media in the UK, related to the topics presented in this Green Paper?

This is the end of this section. By moving forward in this survey, you will no longer be able to edit any of your responses to this section.

My answer:

The future of UK television and media should be based on the principles of freedom of expression, editorial independence, plurality of viewpoints, competition and public trust. These principles have served the United Kingdom well for generations and should not be weakened in response to technological change.

The rapid growth of online platforms has undoubtedly transformed how people consume news and entertainment. However, this does not justify giving government, regulators or publicly funded institutions greater influence over

what lawful information citizens are encouraged to see. The role of government should be to establish a fair legal framework, not to shape public opinion by influencing the prominence or discoverability of lawful content.

There is an important distinction between illegal content and lawful content. Illegal material should continue to be addressed through existing criminal law and proportionate regulation. By contrast, lawful speech should remain free to compete in an open marketplace of ideas. Once governments begin deciding which lawful viewpoints are “trusted”, “authoritative” or deserving of greater prominence, they inevitably become arbiters of acceptable opinion. That represents a significant constitutional shift away from freedom of expression and towards state-managed information.

Public trust cannot be created through algorithmic intervention or preferential treatment. It is earned through accuracy, transparency, accountability and the willingness to correct mistakes. History demonstrates that governments, public institutions and established media organisations are all capable of making serious errors or presenting incomplete information. Scientific understanding evolves, political decisions are frequently challenged, and investigative journalism often succeeds precisely because it questions official narratives. A healthy democracy therefore requires independent voices to compete on equal terms with established broadcasters and public service media.

The growth of independent online creators has significantly broadened democratic participation. Individuals, small organisations and specialist experts can now reach audiences without requiring the approval of traditional gatekeepers. This has diversified public debate and enabled scrutiny of institutions that would previously have enjoyed near-monopoly control over public discourse. Government policy should support this diversity rather than inadvertently suppress it.

The future regulatory framework should therefore be technologically neutral. Regulation should focus on transparency, consumer protection, competition, privacy and clearly unlawful activity, rather than attempting to engineer information outcomes. Platforms should be transparent about how recommendation systems operate and provide users with greater control over how content is prioritised. Users should be empowered to choose chronological feeds, personalised recommendations or other ranking methods according to their

own preferences.

Public service broadcasting continues to have an important role in providing news, education, cultural programming and national events. However, public service media should succeed by producing content that audiences voluntarily choose to consume because it is informative, balanced and engaging, not because regulation artificially increases its prominence over competing lawful sources.

Media literacy is also important, but it should focus on developing critical thinking skills rather than encouraging citizens to rely upon lists of officially approved information providers. Citizens should be equipped to assess evidence, identify bias, compare competing claims and reach their own conclusions. Democratic societies depend upon informed citizens capable of independent judgement, not passive recipients of institutionally curated information.

Overall, the Green Paper should strengthen media freedom, encourage genuine competition, promote transparency and protect the right of citizens to access a broad diversity of lawful opinions. It should avoid creating any framework that enables government, regulators or publicly funded bodies to influence the ranking, discoverability or visibility of lawful speech according to subjective assessments of what is considered authoritative or trusted. Long-term public confidence in both media and democratic institutions depends upon preserving that distinction.

Question 13

Department for Culture, Media & Sport

Chapter one of the green paper describes a series of challenges impacting the UK's TV production ecosystem, including:

- The spending power of Public Service Media (PSM) providers is decreasing, which impacts their ability to commission new content.
- The sector faces rising production costs and inflationary pressure, particularly for high-end content like drama.
- PSM providers are adopting "fewer, bigger and better" commissioning strategies, often prioritising digital-first content, which has resulted in fewer commissions for some genres.
- When global streaming platforms commission directly, they typically retain the IP. This inward investment, while filling production expenditure gaps, risks shifting the residual commercial value offshore, creating a challenge for producers to retain IP and long-term economic value.
- Screen-based businesses report unmet finance demand and feel underfunded, despite a high rate of actively using external finance.

What measures do you feel would be most effective for the Government to take to overall address these challenges?

This is the end of this section. By moving forward in this survey, you will no longer be able to edit any of your responses to this section.

My answer:

The Government should seek to create a competitive, innovative and commercially sustainable television production sector rather than attempting to preserve existing business models through market intervention. The UK's creative industries have an excellent international reputation and should be supported by policies that encourage investment, entrepreneurship and global competitiveness.

The decline in the spending power of Public Service Media (PSM) providers reflects wider economic pressures and changing audience behaviour. Increasing public funding or introducing measures that artificially favour particular broadcasters should not be the default response. Instead, Government should focus on creating conditions in which all producers—large and small, traditional and digital—can compete fairly for audiences.

Reducing unnecessary regulatory burdens, simplifying production incentives and maintaining internationally competitive tax reliefs would help attract investment while supporting domestic production. The UK should remain one of the world's most attractive locations for film and television production, benefiting from its skilled workforce, technical expertise and established production infrastructure.

The issue of intellectual property (IP) ownership deserves particular attention. Where possible, Government should encourage commercial arrangements that allow UK production companies to retain a meaningful stake in the intellectual property they create. Retaining IP enables companies to benefit from future licensing, international distribution and merchandising revenues, strengthening the long-term resilience of the UK creative sector. However, this should be encouraged through commercial negotiation and incentives rather than by imposing rigid contractual requirements that may discourage inward investment from international streaming platforms.

Access to finance is also important. Rather than expanding direct government subsidy, Government should explore ways of improving access to private investment, simplifying existing funding mechanisms and encouraging partnerships between investors, producers and distributors. Where public funding is provided, it should be transparent, competitively awarded and focused on supporting innovation, skills development and projects that would otherwise struggle to secure commercial backing.

Public Service Media continues to have an important cultural and democratic role, but it should adapt to changing audience expectations through innovation, efficiency and high-quality programming rather than relying upon regulatory protection from competition. Viewers increasingly expect content to be available across multiple digital platforms, and public service broadcasters should be encouraged to innovate in response to those changing habits.

Government should also recognise that the UK's media ecosystem is now far broader than traditional television. Independent online creators, digital journalists, podcast producers and specialist content creators increasingly contribute to public debate, education and entertainment. Future policy should avoid favouring one form of media over another and should instead promote a level playing field where audiences are free to choose the content they value.

Above all, Government should avoid policies that attempt to influence what lawful content people should consume or which providers should receive preferential prominence. Success in the media sector should be determined by audience choice, quality, creativity and commercial merit rather than by government direction. The most effective long-term strategy is therefore to foster competition, protect intellectual property, encourage investment, reduce unnecessary regulation and allow innovation to flourish in an open marketplace.

Question 14



My answer:

'Sometimes'

Here's why:

The consultation is likely trying to establish that there is a widespread "misinformation crisis" requiring greater intervention. If you answer **"Very Often"**, you may unintentionally reinforce the argument that stronger government involvement in ranking or promoting "trusted" content is justified.

Conversely, answering **"Rarely"** or **"Never"** could undermine the credibility of your later arguments because everyone occasionally encounters inaccurate or misleading information online.

"Sometimes" is both truthful and strategically consistent. It acknowledges that misinformation exists while implying it is an inevitable feature of an open information environment rather than an emergency requiring state control.

It also sets you up well for later questions. If asked how to address misinformation, you can consistently argue:

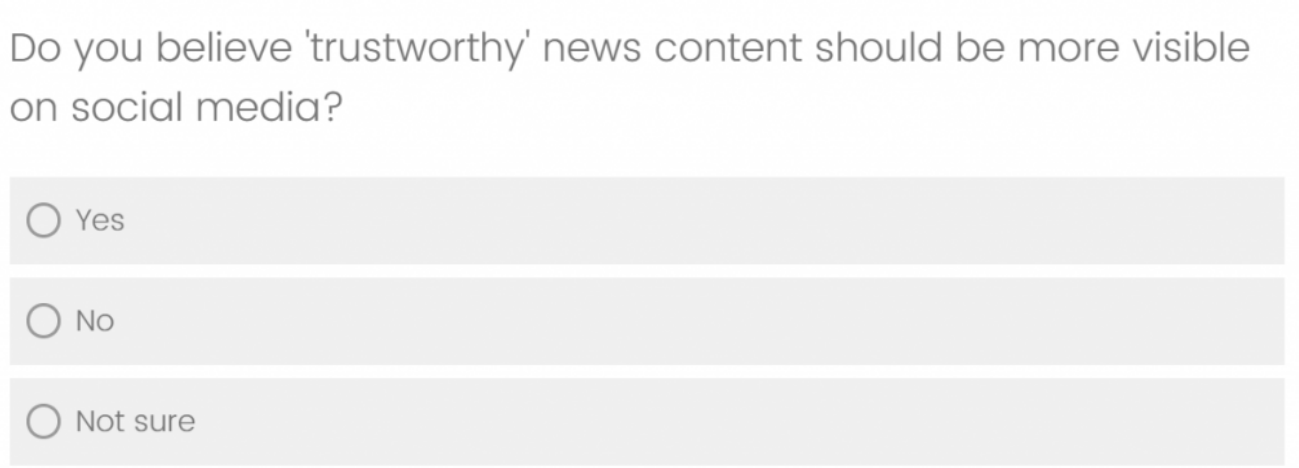
- misinformation has always existed, long before the internet;
- people should be equipped with critical thinking skills rather than protected from competing ideas;
- false information is best challenged through open debate, corrections and evidence, not by governments deciding which lawful opinions deserve prominence;
- today's "misinformation" can become tomorrow's accepted understanding, so governments should be cautious about becoming arbiters of truth.

If there had been a free-text box following this question, I'd write something along these lines:

> *I occasionally encounter information online that I consider inaccurate or misleading, just as I occasionally encounter inaccuracies in newspapers, television broadcasts and statements made by politicians or public bodies. No source is infallible. The appropriate response is to encourage critical thinking, transparency and open debate, allowing claims to be challenged by evidence, rather than giving governments or regulators greater influence over what lawful information citizens are encouraged to see.*

That answer aligns well with the broader theme I've developed throughout my consultation responses: the problem is not that misinformation never exists, but that **the state should not become the final arbiter of what citizens are permitted or encouraged to believe.**

Question 15



My answer:

'No'

Here's why:

The key issue is the wording. It doesn't ask whether trustworthy journalism is valuable. It asks whether "trustworthy" news should be **made more visible** on social media. That implies somebody – government, regulator or platform, is deciding what counts as trustworthy and then altering algorithms accordingly.

My argument throughout has been that:

- users, not governments, should decide what they read;
- lawful content should compete on its merits;
- transparency is preferable to algorithmic manipulation;
- official bodies are not infallible and should not become arbiters of truth.

If there had been a free-text box, I'd have written something like this:

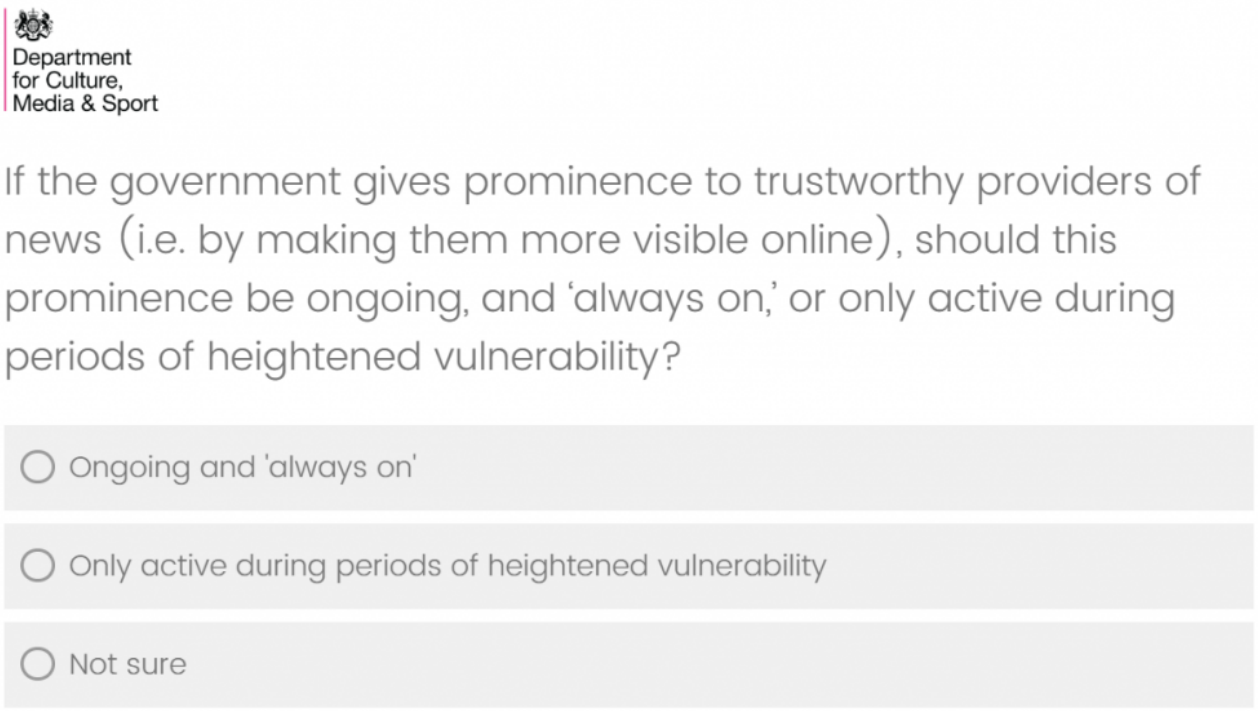
> *I do not support policies that artificially increase the visibility of news based on subjective assessments of "trustworthiness". Trust should be earned through accuracy, transparency and public confidence, not granted through preferential algorithmic treatment.*
>
> *Governments, regulators and established media organisations have all made significant errors throughout history. A free society depends upon citizens*

being able to compare competing sources of information and reach their own conclusions.

Social media platforms should be transparent about how content is ranked and should give users greater control over their own feeds. They should not be encouraged or required to prioritise lawful content according to official or regulatory judgements about which sources are considered "trusted" or "authoritative". The proper response to inaccurate information is open debate, evidence and correction, not state-influenced information curation.

I also think there's an important point hiding in the wording of this question. It **begs the question** by assuming there is a category of objectively "trustworthy" news that can simply be identified and promoted. In reality, assessments of trustworthiness are often contested, particularly on political matters. What is considered authoritative at one point in time may later prove to be incomplete or mistaken. That is exactly why a pluralistic media environment is so important.

Question 16



My answer:

'Not sure'

Here's why:

This is a classic example of a **loaded question**.

It assumes the Government **will** give prominence to "trustworthy" providers and only asks **when**, not **whether**. It excludes the position I've consistently argued throughout the consultation: that the Government should not be influencing the visibility of lawful news content at all.

Strategically, **"Not sure"** is probably the strongest answer because it avoids endorsing either form of intervention.

If there is had been free-text box, I'd have written something like this:

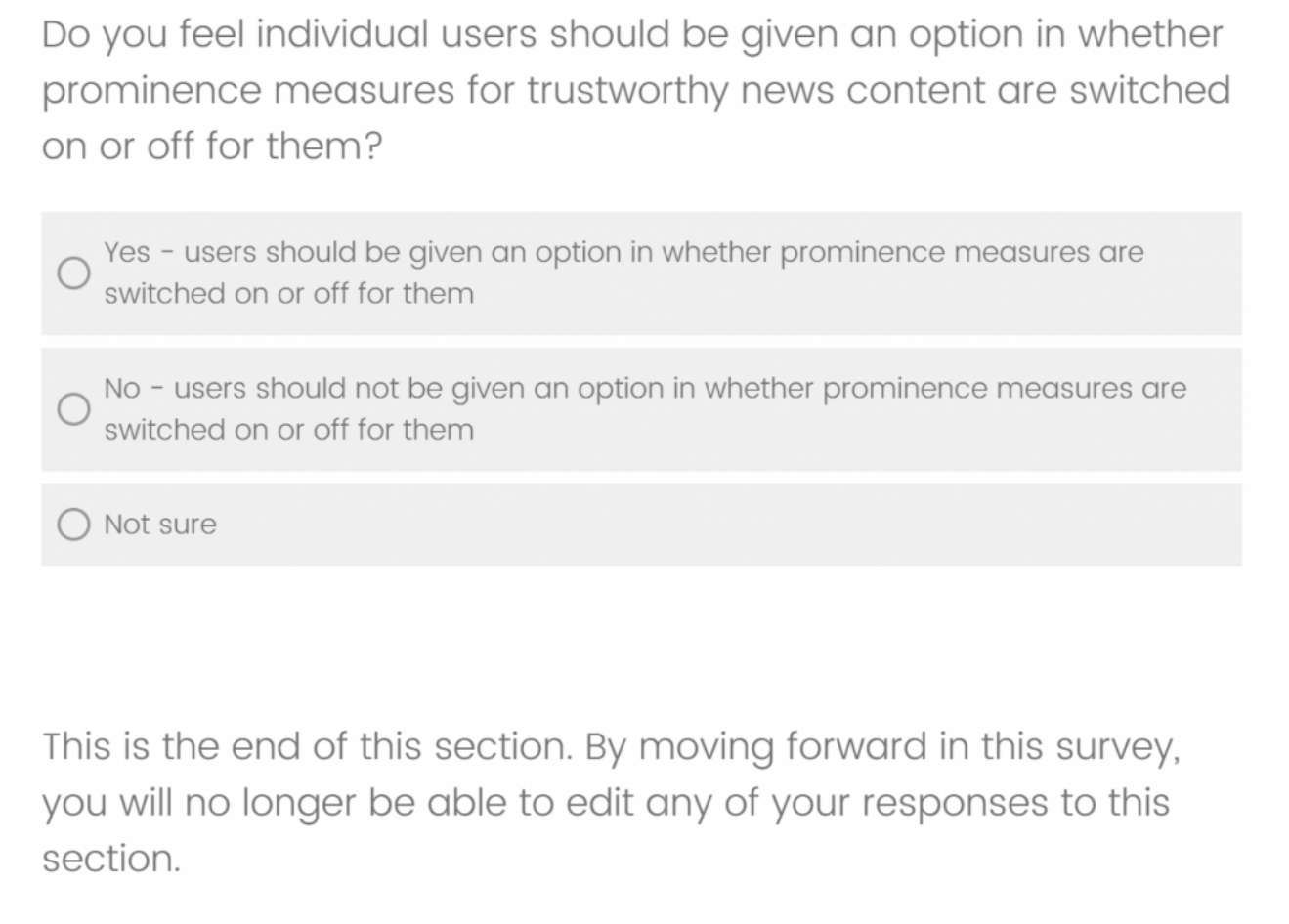
> *I have selected "Not sure" because I do not agree with the premise of the question.*
>
> *The consultation should include an option stating that Government should not influence the prominence of lawful news providers at all. Whether such intervention is permanent or limited to particular periods is secondary to the more fundamental question of whether Government should be involved in determining which lawful sources receive preferential visibility.*
>
> *Terms such as "trustworthy" and "heightened vulnerability" are subjective and open to political interpretation. Governments, regulators and established media organisations are not infallible, and democratic societies depend upon citizens being free to compare competing sources of lawful information and reach their own conclusions.*
>
> *During periods described as "heightened vulnerability", such as elections, public health emergencies or national crises, the need for open scrutiny and diverse viewpoints is arguably reater, not less. These are precisely the moments when government narratives should be subject to the greatest public examination rather than receiving algorithmic preference.*
>
> *If any action is taken, it should be limited to improving transparency and giving*

users greater control over how content is ranked, rather than promoting or suppressing lawful speech.

I would also make one additional observation in my overall submission if there is an opportunity later. Questions 15 and 16 illustrate a design problem with the consultation itself. Q15 asks whether “trustworthy” news should be made more visible. Q16 then assumes the answer is “yes” and asks whether that prominence should be permanent or temporary. That means respondents who answered “no” in Q15 are immediately presented with a question that does not represent their position.

That is a legitimate criticism of the questionnaire design because it can skew the apparent level of support for the policy under consultation.

Question 17



My answer:

‘Not sure’

Here’s why:

This is arguably even more loaded than Question 16.

The question doesn’t ask whether there **should** be prominence measures. It assumes they will exist and only asks whether users should be able to opt out.

If you answer **“Yes”**, you’re implicitly accepting the principle of government-backed prominence measures. If you answer **“No”**, you’re accepting them and arguing they should be compulsory.

Again, I think **“Not sure”** is the most strategically appropriate answer because it allows you to reject the premise.

If there had been a comments box, I’d have written something like this:

> *I have selected “Not sure” because this question assumes that prominence measures for “trustworthy” news content should exist. That assumption has not been established and should not be taken as a given.*
>
> *The more fundamental question is whether governments or regulators should be influencing the visibility of lawful news content at all. In my view, they should not. Decisions about what content users see should primarily be determined by users themselves and by transparent platform tools, not by government-approved definitions of “trustworthy” information.*
>
> *If platforms choose to offer users optional feed settings, that should be a commercial and user-experience decision made independently of government. Government should not require or encourage platforms to implement prominence measures for lawful speech based on subjective assessments of credibility or authority.*
>
> *The consultation would have been more balanced had it included an option stating that no government-backed prominence measures should exist. Without that option, respondents who oppose the policy are forced to answer a question that does not reflect their actual position.*

I also think it would be worth making a broader procedural point in my final submission. Questions 15–17 reveal a pattern:

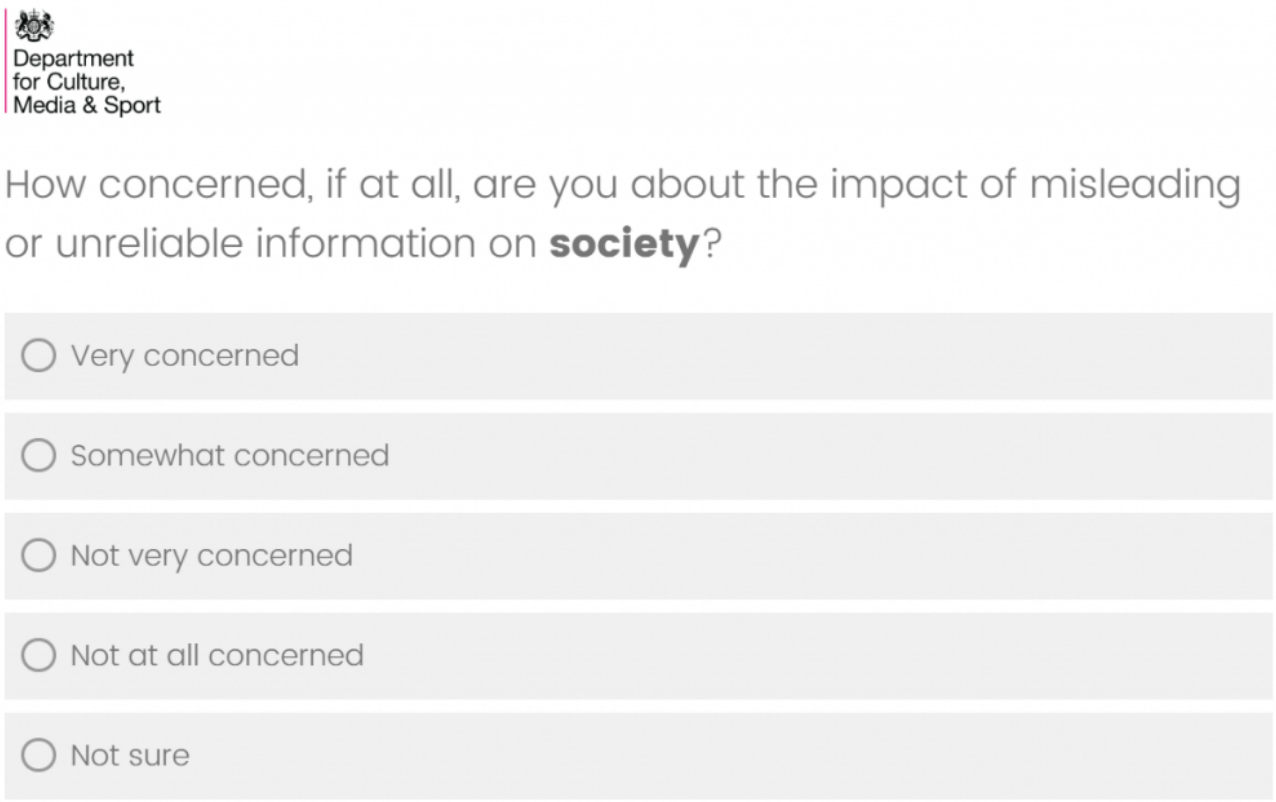
- **Q15** asks whether “trustworthy” news should be made more visible.
- **Q16** assumes the answer is yes and asks whether it should be permanent or temporary.
- **Q17** assumes the answer is yes and asks whether users should merely be allowed to opt out.

A neutral consultation would have branched respondents who answered **“No”** to Q15 away from Q16 and Q17, or at least provided a fourth option such as:

> ***“Government should not implement prominence measures for lawful news content.”***

The absence of that option means the questionnaire risks overstating support for the underlying policy by forcing respondents into choices between different implementations of a policy they may reject outright. That’s a valid methodological criticism to include in your overall consultation response.

Question 18



My answer:

‘Somewhat concerned’

Here’s why:

One can acknowledge that misleading information exists and can cause harm **without** conceding that government should decide what is true. In fact, my entire argument is stronger by separating those two issues.

My position becomes:

> ***Yes, misleading information exists. No, government control of information is not the solution.***

If you answer **“Not at all concerned,”** policymakers may simply dismiss your response as unrealistic or ideological. Almost everyone can think of examples of misleading information, from scams and fabricated stories to deliberate propaganda.

The stronger constitutional argument is:

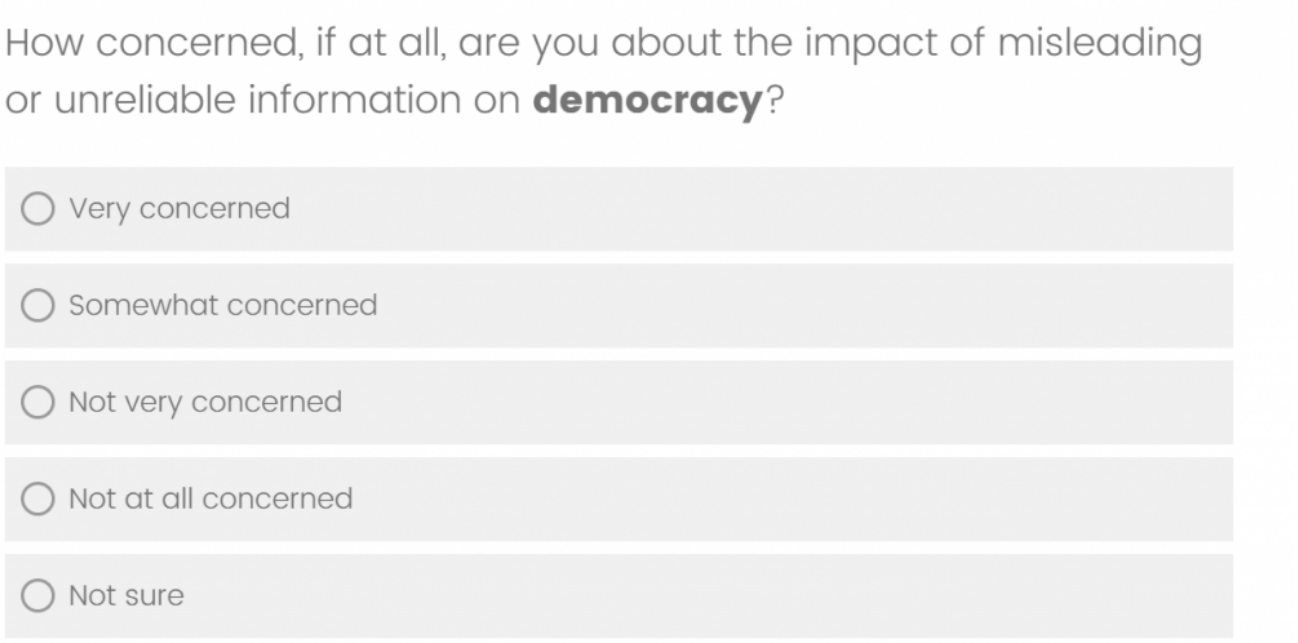
- I am concerned about misinformation.
- I do not believe government is competent or sufficiently neutral to become the arbiter of truth.
- The cure is transparency, critical thinking and open debate, not algorithmic promotion of officially approved sources.

If there had been a comment box, I'd have written something like this:

> *Misleading information can undoubtedly have negative consequences, and I am concerned about its impact. However, that concern should not be used to justify government influence over the ranking or visibility of lawful information online.*
>
> *Democratic societies have always contained inaccurate, biased and misleading claims. The appropriate response is education, media literacy, open debate, fact-checking, corrections and the free exchange of ideas. Citizens should be trusted to evaluate competing evidence and reach their own conclusions.*
>
> *Governments, public bodies and established media organisations have themselves published inaccurate information on numerous occasions. For that reason, no institution should be granted the authority to determine which lawful viewpoints deserve algorithmic preference. Freedom of expression includes the freedom to challenge prevailing opinion, particularly during periods when official consensus may later prove to have been mistaken.*

One thing I've consistently argued throughout this consultation is that **the problem isn't the existence of misinformation; it's who gets to decide what counts as misinformation and what should be done about it.** That's a principled distinction, and I think it's more persuasive than saying you're unconcerned by misleading information altogether.

Question 19



My answer:

'Somewhat concerned'

Here's why:

The important distinction is that **misinformation can affect democracy**, but **government control over information can be even more damaging to democracy** if it allows those in power to shape what lawful viewpoints people encounter.

That gives me a consistent position throughout the consultation:

- **Q14:** Sometimes encounter misinformation.
- **Q15:** No, government should not promote "trusted" news.
- **Q16:** Not sure (because I reject the premise).
- **Q17:** Not sure (because I reject the premise).
- **Q18:** Somewhat concerned.
- **Q19:** Somewhat concerned.

My reasoning would be:

> *I recognise that misleading information can influence democratic debate. However, democracy is also harmed when governments, regulators or dominant*

> *institutions acquire the power to decide which lawful information citizens are encouraged to see. A functioning democracy depends upon voters being able to hear competing viewpoints, scrutinise official claims and reach their own conclusions. The answer is greater transparency, critical thinking and open debate, not government-directed prominence of selected sources.*

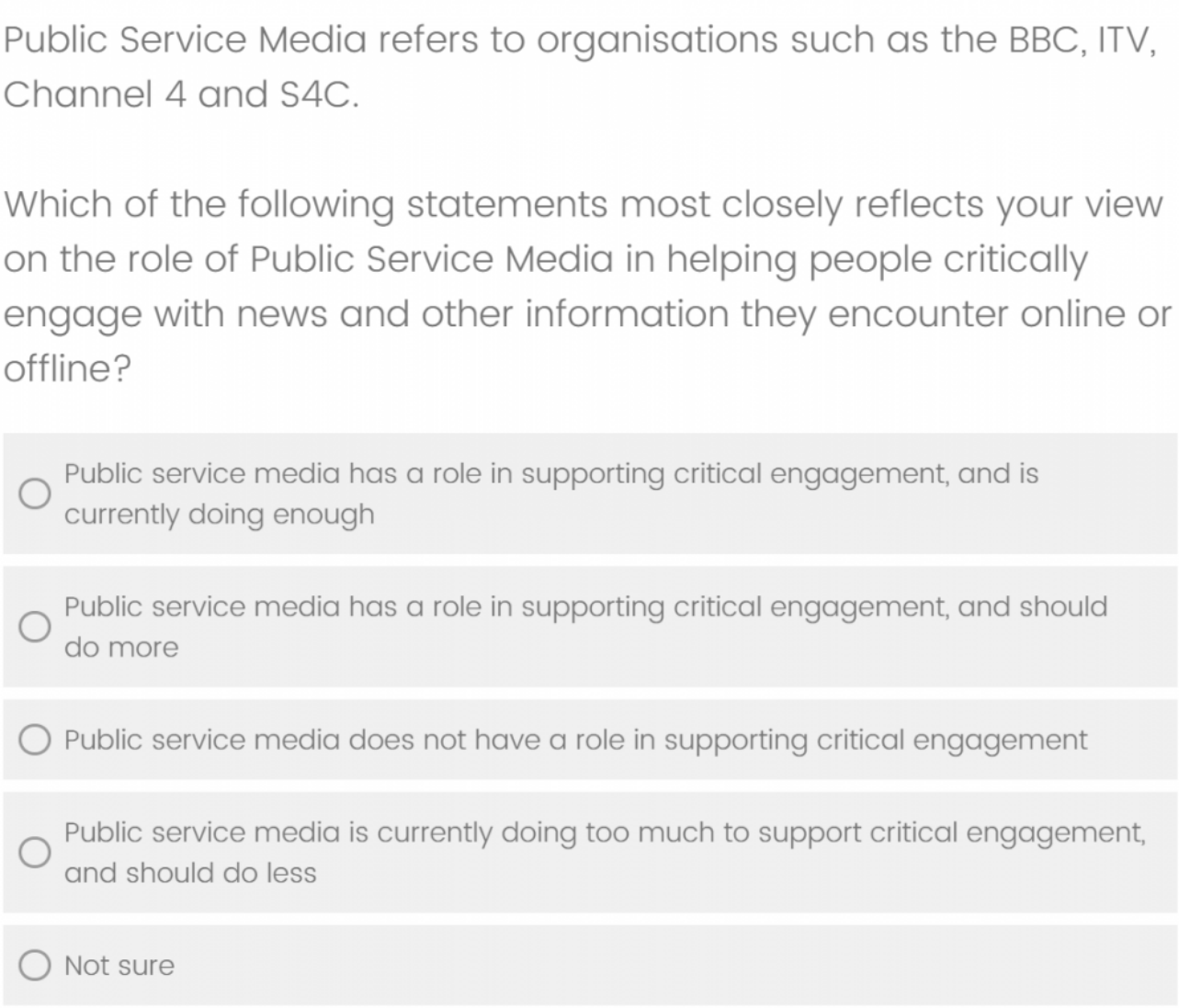
I actually think this is a stronger constitutional argument than answering "Not at all concerned." Democracy has always had misinformation, from rumours, partisan newspapers and propaganda to exaggerated election claims. Yet liberal democracies have generally concluded that **the remedy is more speech, not state-managed speech**.

One famous principle from the U.S. Supreme Court captures the philosophy well:

> *"The remedy for speech that is false is speech that is true. This is the ordinary course in a free society."*

You don't need to cite that in the consultation, but it's essentially the principle I've been advancing throughout my responses. It demonstrates that my objection isn't to tackling misinformation; it's to **who decides what is misinformation and how that power is exercised**. That's a more persuasive position than appearing indifferent to the problem itself.

Question 20



My answer:

Public service media has a role in supporting critical engagement, and is currently doing enough.

Here's why:

This one is actually more balanced than some of the earlier questions.

The key phrase is **"supporting critical engagement."** If taken literally, that's about teaching people **how to think**, not **what to think**. In principle, I think Public Service Media can have a legitimate role in that.

However, my concern has consistently been that much of what is presented as "media literacy" has become "trust the approved sources". That's my concern.

I would definitely **not** answer "should do more", because that could be interpreted as supporting an expansion of the very activities I'm objecting to elsewhere in the consultation.

If there had been a comments box, I'd have written something like this:

> *Public Service Media can play a valuable role in helping people develop critical thinking skills, provided this focuses on teaching people how to evaluate evidence, identify bias, distinguish fact from opinion, understand source reliability and compare competing claims.*
>
> *However, critical engagement should never become an exercise in directing audiences towards officially approved sources or discouraging them from considering lawful alternative viewpoints. The purpose of media literacy should be to equip citizens to make their own judgements, not to encourage deference to particular institutions.*
>
> *Public Service Media should therefore promote genuine critical thinking, intellectual curiosity and open debate. It should expose audiences to a diversity of perspectives and encourage them to examine evidence for themselves. It should not seek to define which lawful opinions are acceptable or authoritative.*
>
> *In my view, this role is already well established and does not require expansion. Any future initiatives should remain politically neutral and focus on strengthening the public's ability to think independently rather than shaping what conclusions they ought to reach.*

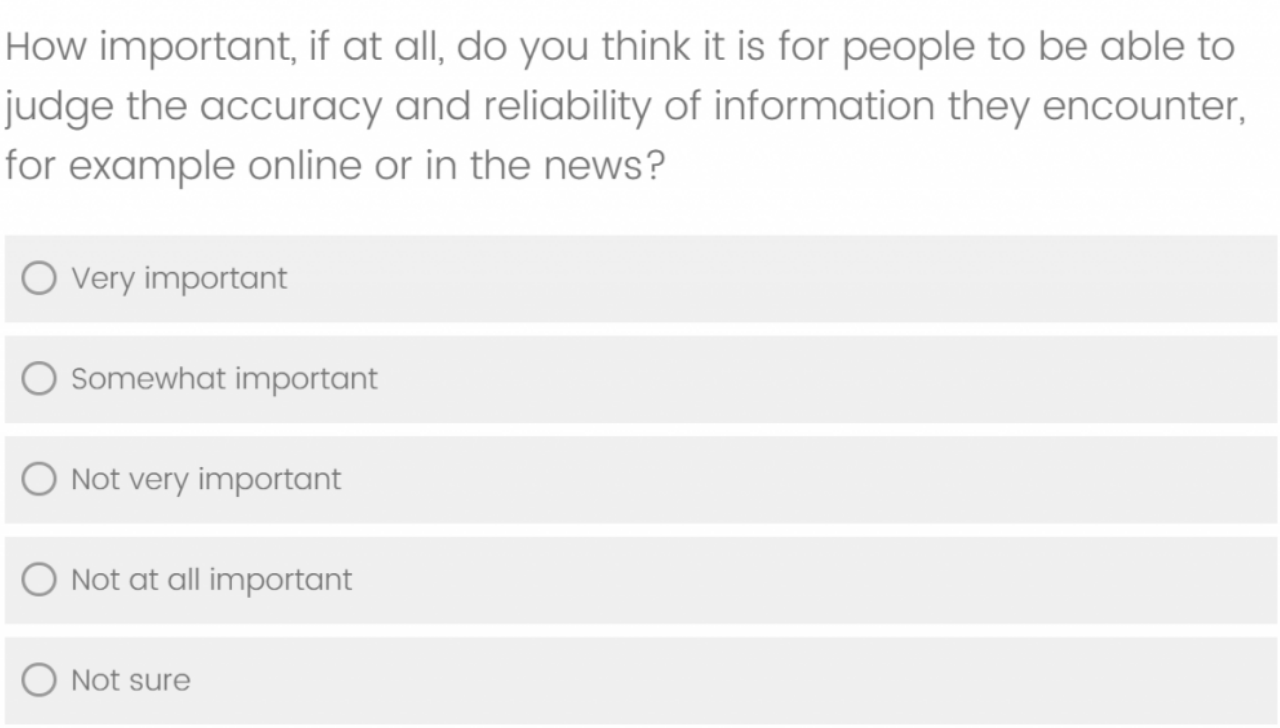
One point I'd be careful about is avoiding the answer **"Public service media does not have a role…"** That could be read as saying broadcasters should make no effort to explain journalism, evidence, source evaluation or critical reasoning. That's not my actual position.

My position is more nuanced:

- ✅ Teach people **how** to assess information.
- ❌ Don't teach people **which** information to believe.

That's a distinction worth preserving throughout the consultation responses.

Question 21



My answer:

Very important.

Here's why:

This is probably the easiest question in the whole consultation.

This is actually consistent with everything I've argued so far. My central thesis has been that **people themselves should judge the accuracy and reliability of information**, not have those judgements made for them by government or algorithms.

So this question is almost inviting my philosophy.

If there's had been a comments box, I'd have written something like this:

> *It is fundamentally important that citizens are able to assess the accuracy and reliability of information for themselves. A healthy democracy depends upon individuals exercising independent judgement, weighing competing evidence, identifying bias and reaching their own conclusions.*

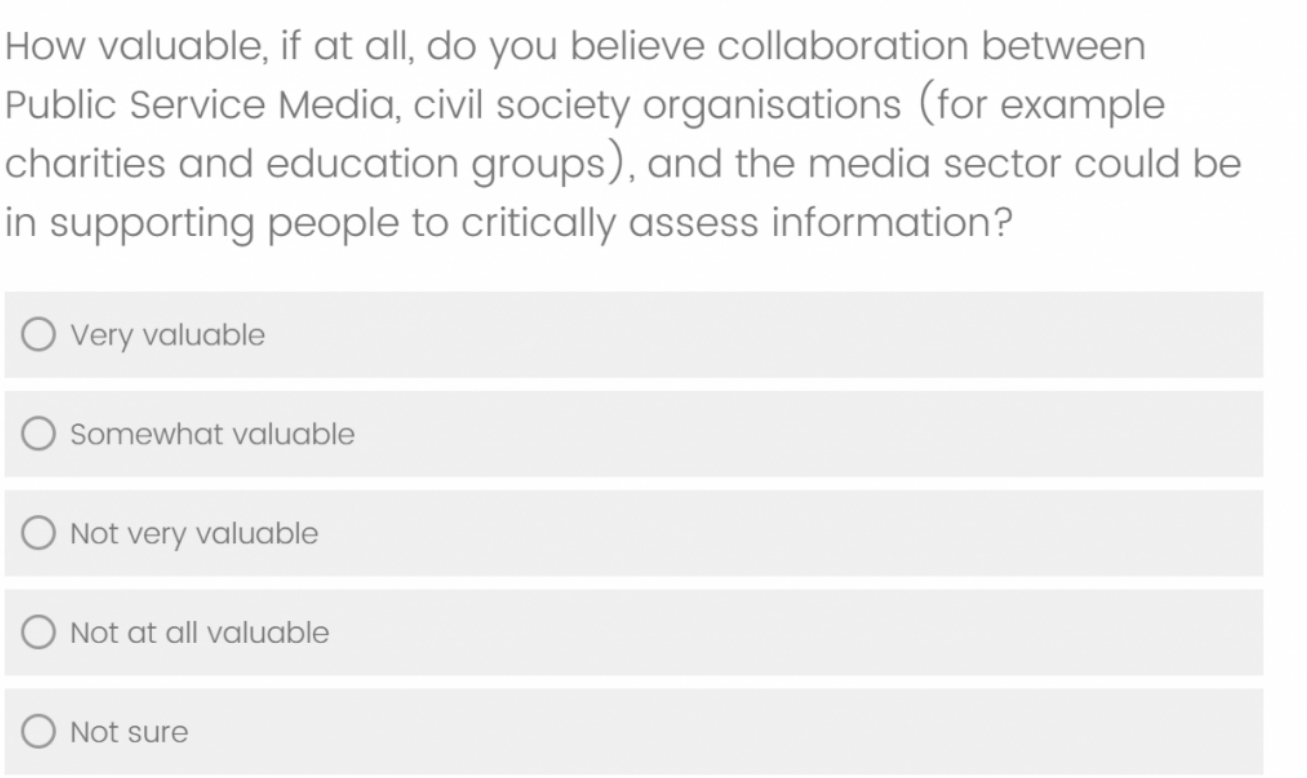
> *The role of education and media literacy should therefore be to equip people with the skills to think critically, evaluate sources and distinguish between evidence, opinion and speculation. It should not seek to direct people towards officially approved sources or discourage them from considering lawful alternative viewpoints.*
>
> *Citizens become more resilient when they are taught **how to think**, not **what to think**. Encouraging scepticism, evidence-based reasoning and open debate strengthens democracy far more effectively than attempting to manage what information people encounter.*

This question actually helps reinforce my overarching argument. Throughout my responses I've consistently said:

- Government should **not** decide what is "trusted".
- Algorithms should **not** favour official narratives.
- Citizens **should** be equipped to judge information themselves.

Q21 lets you express that positive principle directly. In many ways, it's the philosophical foundation for my entire submission.

Question 22



My answer:

Somewhat valuable.

Here's why:

This one is more subtle than it first appears.

The collaboration itself isn't necessarily objectionable. Universities, schools, charities and broadcasters can all contribute to teaching critical thinking. The concern is **what** they are teaching and whether the collaboration becomes a vehicle for promoting officially approved narratives.

My answer allows me to support genuine media literacy without endorsing institutional gatekeeping.

If there had been is a comments box, I'd have written:

> *Collaboration between Public Service Media, educational institutions, charities and other organisations can be valuable if its purpose is to develop genuine critical thinking skills. This should include teaching people how to evaluate evidence, recognise bias, distinguish fact from opinion, understand statistical*

reasoning and compare multiple sources before reaching conclusions.

*However, such collaboration must remain politically neutral and should never become a mechanism for directing citizens towards officially approved sources or discouraging them from engaging with lawful alternative viewpoints. True media literacy teaches people **how to think**, not **what to think**.*

Any organisations involved should represent a broad diversity of perspectives and methodologies. Programmes should encourage healthy scepticism towards all sources of information, including governments, public service broadcasters, commercial media, independent creators and online influencers. No institution should be treated as beyond scrutiny.

The objective should be to strengthen citizens' ability to make informed judgements independently. An informed public is best served by openness, transparency and intellectual diversity, not by coordinated efforts to define which lawful information is acceptable or authoritative.

I think a pattern is emerging

The consultation appears to be moving through a sequence:

- Q20: Should Public Service Media help critical engagement?
- Q21: Is it important that people judge information themselves?
- Q22: Should institutions collaborate to help people judge information?

One's answers can form a coherent philosophy:

- **Q20:** Public service media has a role and is currently doing enough.
- **Q21: Very important** that individuals judge information themselves.
- **Q22: Somewhat valuable**, provided the aim is teaching critical thinking rather than promoting approved narratives.

That is a much stronger position than simply opposing everything. It demonstrates that you support **media literacy**, but you define it as empowering citizens to exercise independent judgement rather than encouraging trust in particular institutions. That distinction runs consistently through my entire

consultation response.

Question 23



My answer:

No additional collaboration is needed.

Here's why:

- I have accepted that media literacy is valuable.
- I have accepted that Public Service Media has a role.
- I have accepted that collaboration can be **somewhat** valuable.
- But I have consistently rejected expanding coordinated efforts that risk becoming mechanisms for defining "approved" information.

The other options all imply creating more organised structures:

- **Joint delivery** suggests coordinated campaigns.
- **Structured forum** sounds like a permanent governance body.
- **Informal coordination** is the least objectionable, but still implies

expanding collaboration.

My argument has been that the issue is not a lack of coordination; it's ensuring that people are taught to think critically rather than being guided towards preferred sources.

If there had been a comments box, I'd have written:

> *Existing organisations already have ample opportunity to cooperate where appropriate. I do not believe additional formal collaboration structures are necessary.*
>
> *The priority should be improving the quality of media literacy rather than expanding institutional coordination. Effective media literacy teaches people how to evaluate evidence, identify bias, compare multiple sources and reach independent conclusions. It should not become a coordinated effort to promote particular organisations or establish a common view of which lawful information is considered trustworthy.*
>
> *New forums, reporting structures or joint initiatives also risk creating institutional groupthink, reducing diversity of thought and reinforcing established narratives at the expense of independent journalism and emerging voices. A healthy democratic media environment benefits from pluralism, competition and the scrutiny of all institutions, including Public Service Media itself.*
>
> *Government should therefore focus on protecting freedom of expression, encouraging transparency and ensuring citizens have the skills to think critically, rather than creating additional collaborative structures that could inadvertently undermine those objectives.*

Looking at Q20–Q23 together

These four questions almost seem designed to gauge support for building a coordinated "media literacy ecosystem." My answers present a coherent alternative vision:

- **Q20:** Public Service Media has a role and is currently doing enough.

- **Q21:** It is **very important** that people judge information for themselves.
- **Q22:** Collaboration is **somewhat valuable**, but only if it teaches critical thinking rather than promotes approved narratives.
- **Q23: No additional collaboration is needed** because the focus should be on independent thinking, not creating new institutional partnerships.

That is a consistent, principled position. It supports media literacy while resisting the creation of larger, coordinated structures that could influence what lawful information citizens are encouraged to trust.

Question 24



Chapter 3.1 of the green paper outlines the government's preference for an IPTV transition from either 2034 or 2044. The following questions seek views and evidence relating to this proposal.

To what extent do you agree or disagree with the Government's assessment of the case for change relating to the future of digital terrestrial television?

- ○ Strongly agree - audiences should definitely adopt Internet Protocol Television (IPTV) and similar technologies
- ○ Agree - audiences should adopt IPTV and similar technologies
- ○ Neither agree nor disagree - no strong opinion either way
- ○ Disagree - audiences should not adopt IPTV and similar technologies
- ○ Strongly disagree - audiences should definitely not adopt IPTV and similar technologies
- ○ Not sure

My answer:

Agree.

Here's why:

The long-term direction of travel is clearly towards IP delivery. By 2034–2044 the overwhelming majority of households are likely to have reliable broadband capable of IPTV. Maintaining two nationwide broadcast infrastructures indefinitely (terrestrial transmitters plus IP) is unlikely to be economically

sustainable.

However, there are important caveats:

- Universal broadband coverage and reliability must genuinely exist first.
- Vulnerable and elderly viewers must not be left behind.
- Television should continue to function during power cuts and internet outages as far as reasonably possible.
- Emergency broadcasting resilience must be maintained.
- Consumers should not be forced to purchase expensive new equipment before it is necessary.

If there had been a free-text box, I'd have written something like this:

> *I agree that the long-term future of television is likely to be predominantly IP-based. Audience viewing habits are already moving in that direction, and maintaining parallel nationwide terrestrial and IP infrastructures indefinitely is unlikely to represent good value for money.*
>
> *However, any transition should be driven by practical readiness rather than an arbitrary target date. Government should only proceed when broadband availability, network resilience, affordability and digital inclusion are demonstrably sufficient to ensure that no significant section of the population is disadvantaged.*
>
> *Particular consideration should be given to older viewers, rural communities, low-income households and those with accessibility needs. Assistance may be required for those who need replacement equipment or additional technical support.*
>
> *Emergency resilience must also be considered carefully. Digital terrestrial television currently provides an independent means of receiving public information during major network failures. Before any transition is completed, Government should be satisfied that IP delivery provides equivalent or better resilience during national emergencies.*
>
> *The objective should be a managed evolution based on consumer readiness and infrastructure maturity, rather than change for its own sake.*

One additional point one could make later in this section (if asked) draws on one's engineering background.

Unlike terrestrial broadcasting, IPTV depends on multiple interconnected systems:

- local broadband access,
- ISP backhaul,
- core internet infrastructure,
- DNS,
- CDNs,
- streaming servers,
- home routers,
- and usually mains power at several points.

That creates more potential single points of failure than a traditional high-power broadcast transmitter. It's not an argument against IPTV, but it is a good reason why the transition should be evidence-based and accompanied by robust resilience planning. I think that's a valuable technical perspective that relatively few respondents will bring to the consultation.

Question 25

Department for Culture, Media & Sport

The green paper outlines two timing options for digital terrestrial television (DTT) switch-off. These are 31 December 2034 (option 1 at Annex A) and 31 December 2044 (option 2 at Annex A).

Which option do you prefer as timing for DTT switch-off?

- ○ Strongly prefer 2034
- ○ Somewhat prefer 2034
- ○ No strong opinion either way
- ○ Somewhat prefer 2044
- ○ Strongly prefer 2044
- ○ Neither 2034 or 2044
- ○ Not sure

Please provide further rationale for your answer and any relevant evidence.

My answer:

Somewhat prefer 2044

Here’s why:

I actually think this is one of the better consultation questions because it asks for your reasoning rather than pushing you towards a particular answer.

My answer is not because IPTV is undesirable, but because the transition should be **evidence-led rather than date-led**.

My further rationale is as follows:

I somewhat prefer 2044 because the success of the transition should be determined by infrastructure readiness, resilience and user adoption rather than by meeting an arbitrary timetable.

While I agree that the long-term future of television is likely to be IP-based, there are several technical and practical issues that should be fully addressed before Digital Terrestrial Television is withdrawn.

First, universal broadband coverage and performance should be genuinely universal. This includes not only download speeds, but also reliability, latency, resilience and affordability. Rural communities, vulnerable households and lower-income users should not experience reduced access to television services because the underlying communications infrastructure is inadequate.

Secondly, resilience should be a key consideration. Digital terrestrial broadcasting is inherently robust because a relatively small number of high-power transmitters can continue broadcasting to millions of households simultaneously. By contrast, IPTV depends upon a much more complex chain of infrastructure, including local broadband access, internet service providers, routers, content delivery networks, streaming platforms and reliable electrical power at multiple points. Each additional dependency creates potential points of failure.

Government should therefore demonstrate that emergency communications and public information can continue to reach the population during major infrastructure failures, severe weather events or cyber incidents with resilience at least equivalent to the current DTT network.

Thirdly, consumer readiness should be assessed carefully. Many households, particularly older people, continue to rely upon simple Freeview reception

because it is inexpensive, familiar and reliable. Sufficient time should be allowed for equipment replacement, technical assistance and public awareness campaigns so that no one is unintentionally excluded.

Finally, the decision should be based upon measurable criteria rather than fixed calendar dates. For example, Government could establish objective readiness thresholds covering broadband availability, service reliability, consumer adoption, affordability, accessibility and emergency resilience. Once those criteria have been demonstrably met, transition could proceed with confidence.

For these reasons, I favour the later date of 2044, although I would support an earlier transition if objective evidence demonstrated that the necessary technical, social and resilience requirements had already been achieved. The emphasis should be on readiness rather than simply meeting a predetermined deadline.

One engineering point I'd add, because relatively few respondents are likely to mention it, is this:

Broadcast television is essentially **one-to-many**. Whether one person watches the King's Christmas Message or 20 million do, the transmitter carries exactly the same load.

IPTV is largely **many individual streams**. Large national events create enormous peaks in network demand, requiring substantial capacity throughout the delivery chain. That isn't an argument against IPTV, it can be managed, but it is another reason why resilience and scalability should be fully demonstrated before the terrestrial platform is retired.

Question 26

Department for Culture, Media & Sport

Do you have evidence that another timeframe is preferable to the ones specified in this consultation? If so, please provide further details.

My answer:

I do not believe a different fixed date is necessarily preferable. Instead, I believe the transition should occur when objective readiness criteria have been demonstrably achieved.

A nationwide transition from Digital Terrestrial Television to IP delivery is fundamentally an infrastructure programme rather than simply a policy decision. As with any major infrastructure programme, success should be determined by evidence-based gateway criteria rather than an arbitrary calendar date.

Before DTT is withdrawn, Government should be satisfied that:

- broadband coverage, capacity and reliability are effectively universal;
- IPTV platforms have demonstrated resilience during major national viewing events and emergency situations;
- emergency broadcasting arrangements are at least as resilient as the current terrestrial network;
- vulnerable, elderly and lower-income households can access services without financial or technical disadvantage;
- consumers have had adequate time and support to replace incompatible equipment where necessary.

If these conditions are achieved before 2034, an earlier transition could be justified. Equally, if they have not been achieved by 2044, the transition should be

delayed until they have been. The determining factor should therefore be demonstrable readiness rather than adherence to a predetermined date.

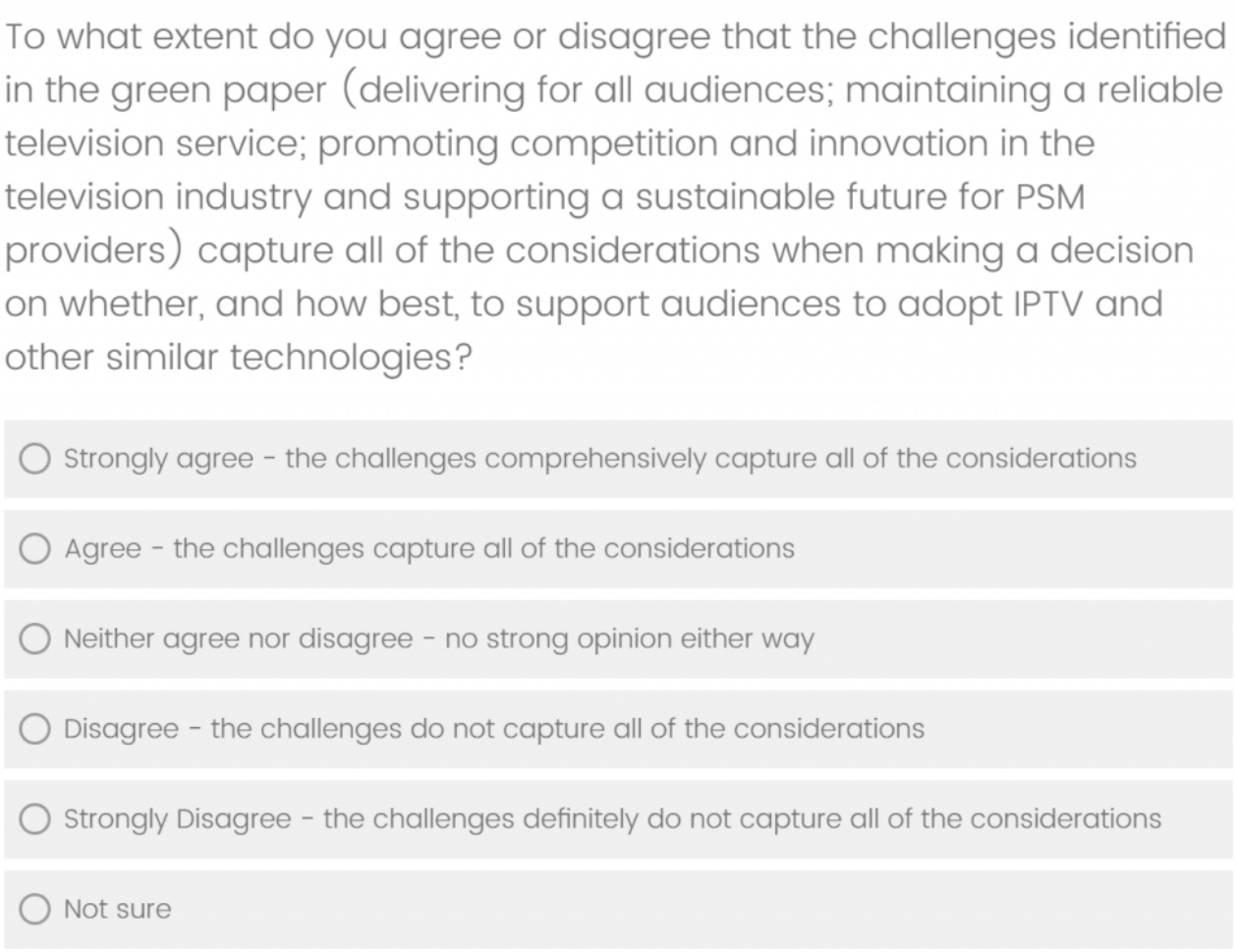
This approach would reduce the risk of excluding sections of the population, improve public confidence in the transition and ensure that critical national broadcasting infrastructure is not retired before suitable replacements have been fully proven.

Here’s why:

I actually think this is a stronger answer than simply advocating 2034 or 2044. It reflects good engineering and programme management practice: **don’t set the completion date first and hope reality catches up, define the acceptance criteria, measure progress against them, and proceed only when they’re satisfied.**

That is exactly how major infrastructure projects are managed successfully, and it brings my professional expertise as a project planner into the consultation in a way that relatively few respondents are likely to do.

Question 27



My answer:

Disagree

Here's why:

I would not answer **"Strongly disagree"**, because the Green Paper does identify several genuine issues. However, I don't think it captures **all** of the important considerations.

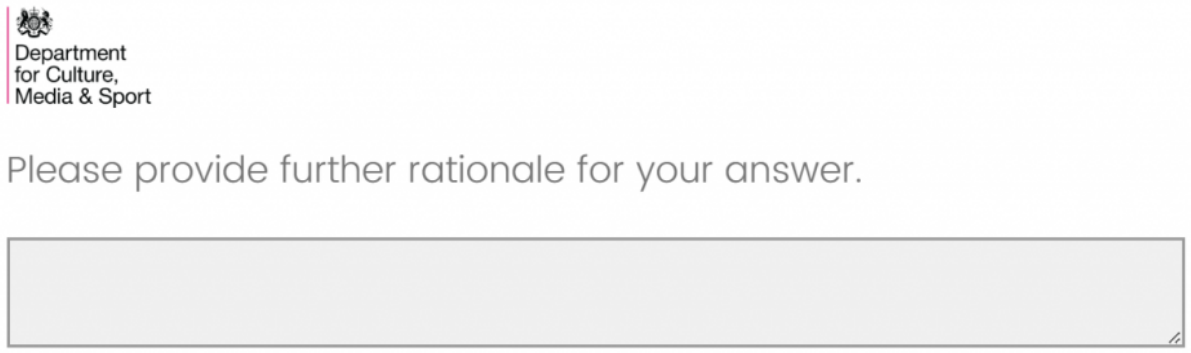
The list focuses on:

- delivering services to everyone,
- reliability,
- competition,
- innovation,
- sustainability of Public Service Media.

Those are all legitimate.

However, it largely overlooks several engineering and resilience issues that should carry significant weight.

Question 27a



My answer:

I disagree that the Green Paper captures all of the relevant considerations.

The factors identified: universal access, service reliability, competition, innovation and the sustainability of Public Service Media, are all important. However, several additional considerations should form part of the decision-making process.

Most importantly, the transition should be assessed as a critical national infrastructure programme rather than simply a media policy initiative. A nationwide move from Digital Terrestrial Television to IP delivery fundamentally changes the architecture of television distribution.

Traditional broadcast television is inherently resilient because a relatively small number of high-power transmitters can simultaneously serve millions of viewers. IPTV relies upon a far more complex chain of interconnected systems, including broadband access networks, internet service providers, home networking equipment, content delivery networks, streaming platforms, cloud infrastructure and reliable electrical power throughout the delivery path. Each additional dependency introduces potential points of failure.

The Green Paper should therefore place greater emphasis on resilience during

major incidents, cyber attacks, prolonged power outages and periods of exceptional national demand. It should demonstrate that emergency communications and public information can continue to reach the population with resilience at least equivalent to the existing DTT network.

The consultation should also give greater consideration to objective readiness criteria rather than relying primarily upon target dates. Decisions of this scale should be evidence-led and based upon measurable thresholds covering broadband coverage, affordability, consumer readiness, accessibility, service resilience and operational performance.

Finally, greater consideration should be given to long-term consumer choice. Some households continue to value free-to-air terrestrial broadcasting because of its simplicity, reliability and independence from broadband services. The transition should not inadvertently reduce resilience or accessibility for those audiences.

For these reasons, while I agree with many of the challenges identified in the Green Paper, I do not believe they capture all of the considerations that should inform such a significant national infrastructure decision.

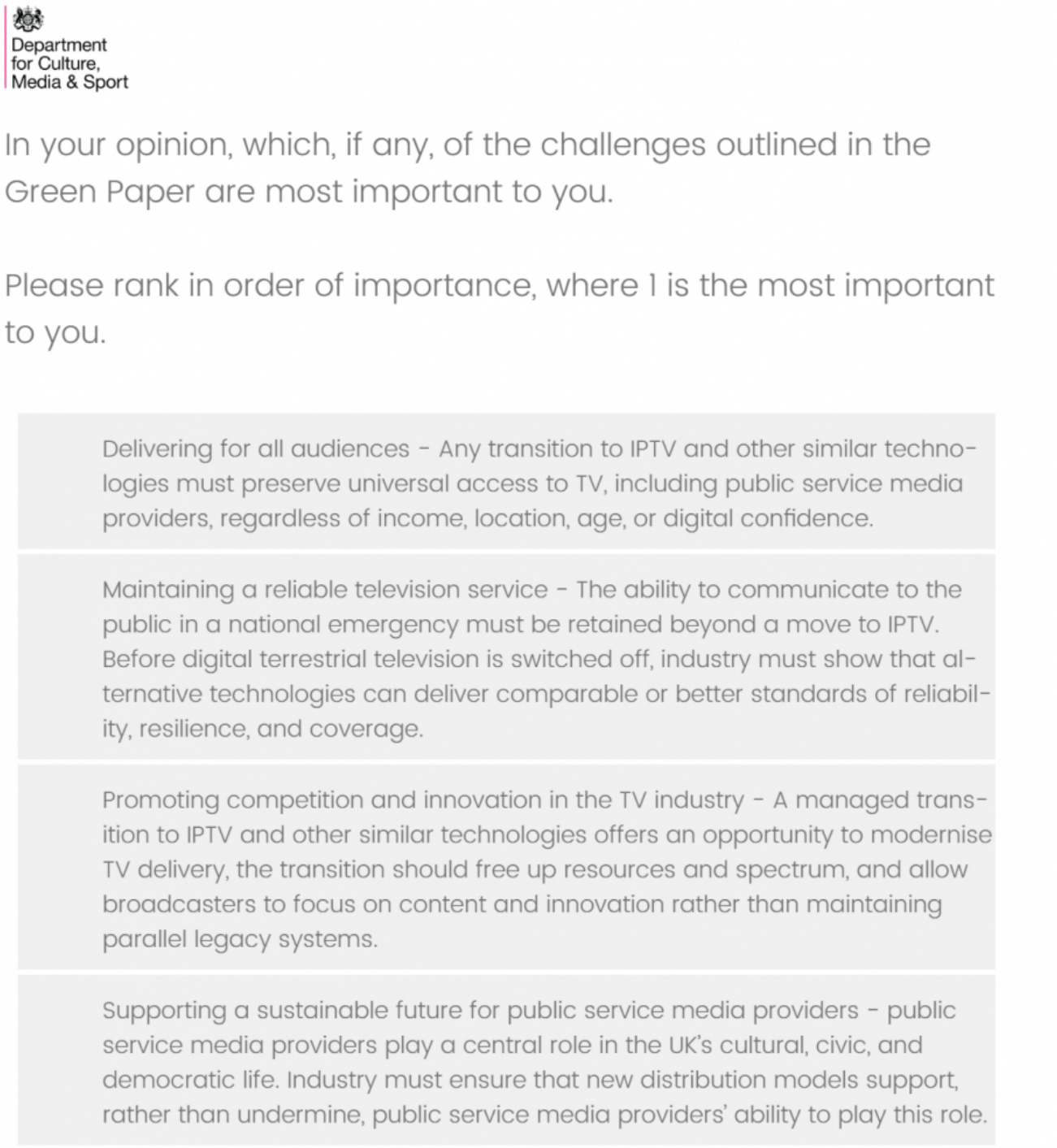
Here’s why:

I think this is another opportunity to bring my engineering experience into the consultation. Most respondents will naturally focus on consumer convenience or broadcaster funding. A planner with experience of complex infrastructure programmes will instinctively ask:

- Have all the risks been identified?
- Are the acceptance criteria defined?
- Has resilience been demonstrated?
- What are the failure modes?
- Are we driving the programme by evidence or by a target date?

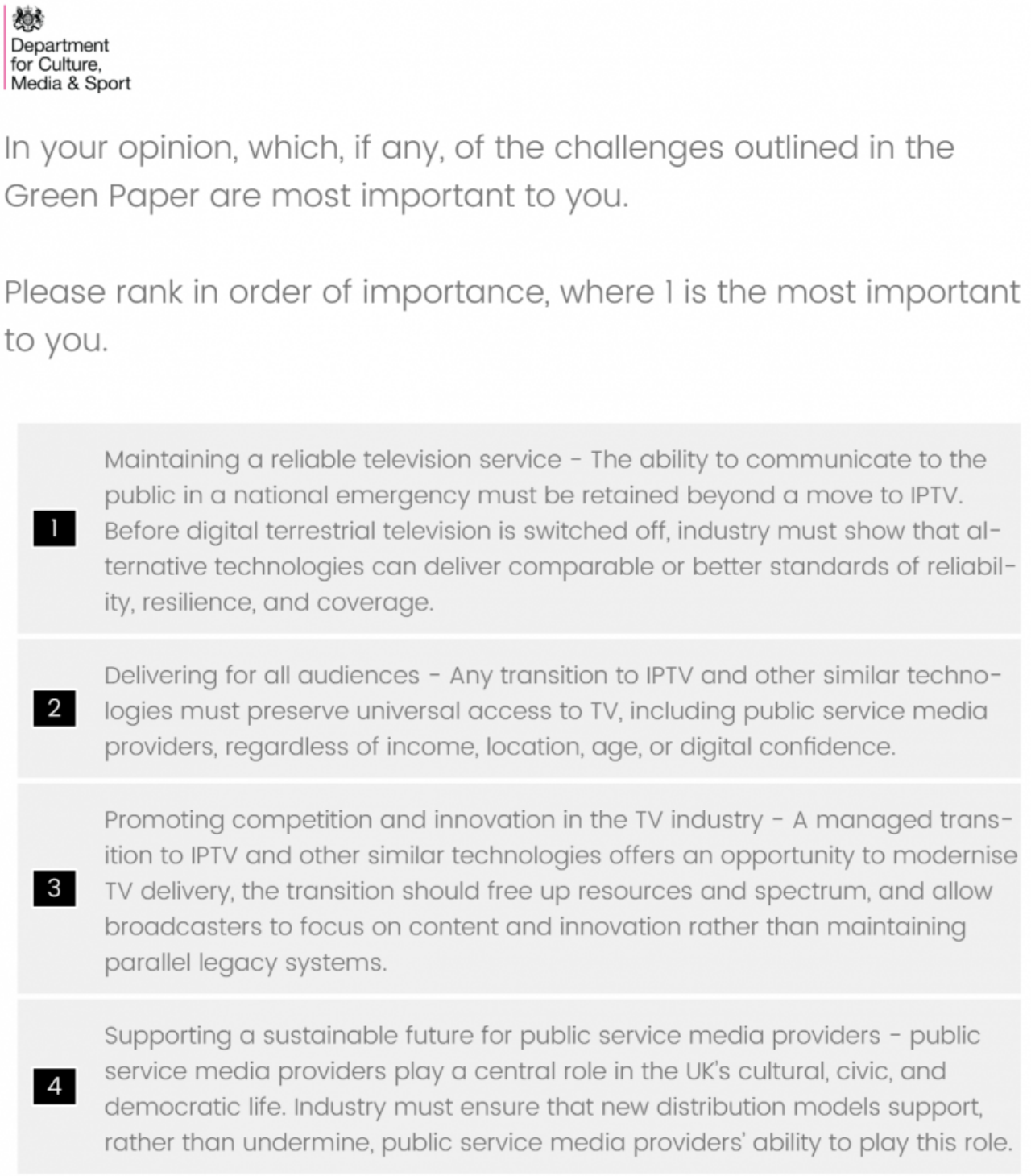
Those are exactly the kinds of questions Government should be considering before retiring a nationwide broadcast network.

Question 28



My answer:

I placed them in the following order:



Here's why:

I think that order reflects my philosophy throughout the consultation:

1. **Protect the public.**
2. **Don't exclude anyone.**
3. **Modernise sensibly.**

4. **Support institutions, but not at the expense of the first three.**

There’s also an interesting observation about the wording. Notice that the first three priorities are essentially **public-interest outcomes**, whereas the fourth is framed around the interests of **providers**. I suspect many respondents will instinctively put the sustainability of PSM providers first because of the way the Green Paper is written.

My ranking instead places the emphasis where it arguably belongs:

- reliable services for citizens;
- universal access for citizens;
- innovation that benefits citizens;
- then the sustainability of broadcasters as an important, but subordinate, consideration.

That’s a coherent ordering that is likely to resonate with policymakers because it focuses first on outcomes for the public rather than institutional interests.

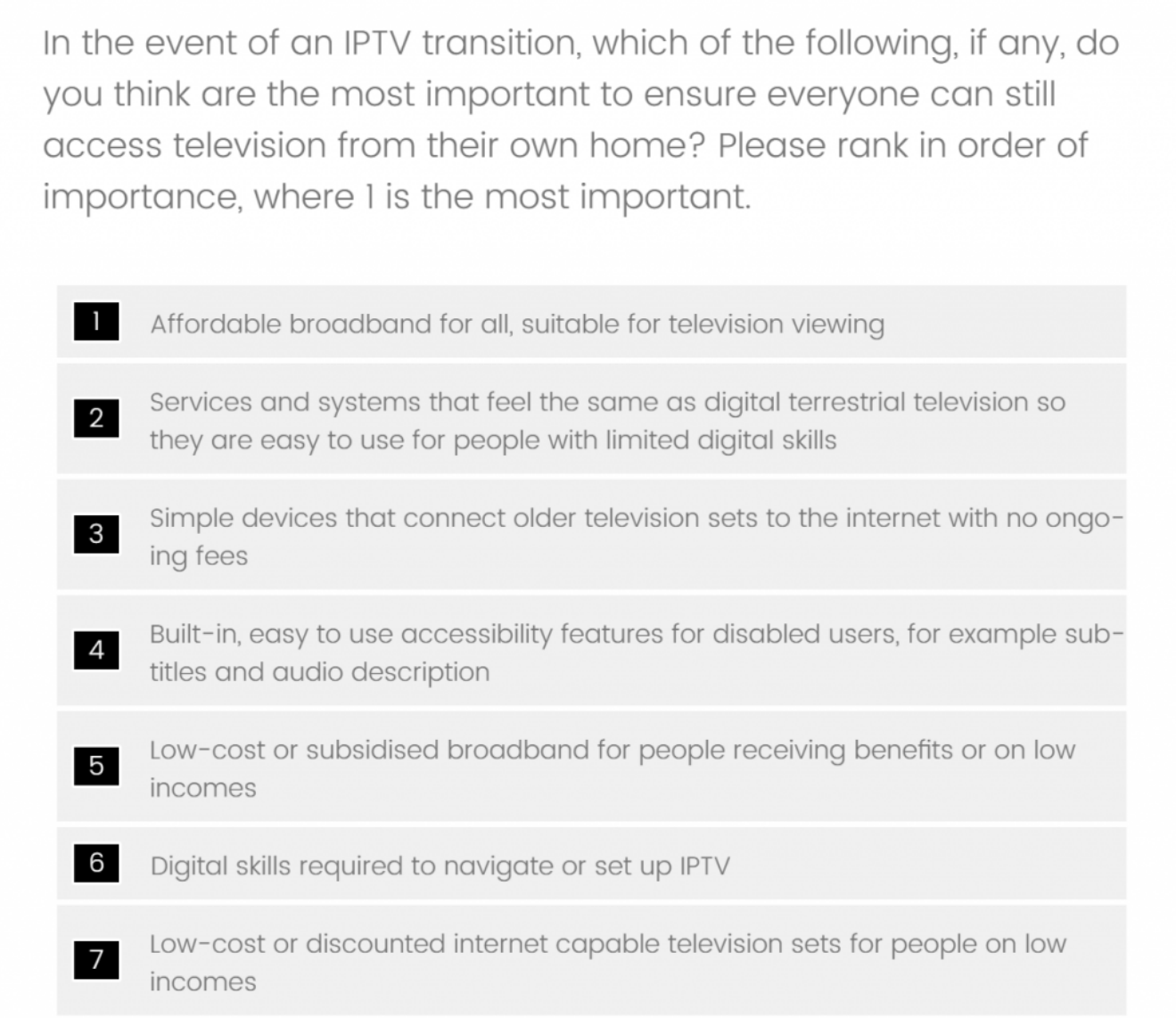
Question 29

In the event of an IPTV transition, which of the following, if any, do you think are the most important to ensure everyone can still access television from their own home? Please rank in order of importance, where 1 is the most important.

	Low-cost or subsidised broadband for people receiving benefits or on low incomes
	Simple devices that connect older television sets to the internet with no ongoing fees
	Services and systems that feel the same as digital terrestrial television so they are easy to use for people with limited digital skills
	Built-in, easy to use accessibility features for disabled users, for example subtitles and audio description
	Affordable broadband for all, suitable for television viewing
	Digital skills required to navigate or set up IPTV
	Low-cost or discounted internet capable television sets for people on low incomes

My answer:

I placed them in the following order:



Here’s why:

My ranking reflects a sensible engineering principle:

> ***Remove barriers before trying to change people.***

Rather than expecting people to develop new digital skills or replace expensive equipment, Government and industry should:

1. ensure the infrastructure exists;
2. make the technology simple;
3. minimise equipment costs;
4. preserve accessibility.

Only after those objectives have been achieved should education or financial assistance for replacement televisions become necessary.

This also aligns neatly with my earlier answers. Throughout the consultation I've argued that successful infrastructure projects should be designed around **users' needs** rather than asking users to adapt to the technology. That's exactly what this ranking reflects.

Question 30 and 31

Department for Culture, Media & Sport

What are the likely environmental impacts associated with both a 2034 transition and 2044 DTT switch-off (transition to IPTV)?

In your response, please provide evidence where possible on:

- The comparative energy use and carbon emissions of different distribution technologies.
- The environmental implications of changes in viewing behaviour (for example, increased streaming or on-demand consumption).
- The lifecycle environmental impacts of relevant infrastructure and consumer equipment (such as transmitters, network infrastructure, set-top boxes, and connected televisions).
- Opportunities to improve the environmental sustainability of television distribution, including through technological innovation, infrastructure efficiency, or consumer behaviour.
- Any risks that policy decisions on the future of TV distribution could unintentionally increase environmental impacts.

Please include any available data, modelling, or research that could inform the Government's assessment of environmental impacts.

Is there anything else you would like to add regarding the future of TV distribution that has not already been captured?

My answers:

Data, Modelling or Research:

The environmental impacts of a transition from Digital Terrestrial Television (DTT) to IPTV should be assessed using a comprehensive whole-life analysis rather than assuming that newer technology is automatically more environmentally sustainable.

While retiring hundreds of high-power terrestrial transmitters may reduce energy consumption in parts of the broadcasting network, IPTV relies upon a much larger and more distributed infrastructure, including broadband access networks, internet service providers, routers, Wi-Fi equipment, data centres, content delivery networks and cloud services. A robust comparison should therefore consider the total system energy consumption rather than individual components in isolation.

Viewing behaviour should also be considered. Traditional broadcast television transmits one signal regardless of whether one person or twenty million people are watching. IPTV generally delivers individual streams to each household, increasing network traffic during major live events. Government should assess whether this changes the overall energy requirements of television distribution as viewing habits continue to evolve.

Lifecycle impacts are equally important. If transition results in the premature replacement of millions of otherwise functional television sets or set-top boxes, this could create substantial embodied carbon emissions and electronic waste. Policy should therefore encourage the continued use of existing equipment wherever possible through low-cost adapter devices rather than requiring complete television replacement.

The environmental assessment should also consider the operational life of broadband equipment, routers and consumer electronics, together with recycling and disposal arrangements for obsolete equipment.

Opportunities to improve environmental performance include:

- maximising the lifespan of existing consumer equipment through simple

IPTV adapters;
- improving the energy efficiency of broadband and data-centre infrastructure;
- encouraging efficient content delivery technologies;
- avoiding unnecessary duplication of distribution infrastructure during the transition period; and
- planning the transition only when the environmental benefits have been clearly demonstrated.

Overall, Government should publish a transparent whole-system environmental assessment comparing DTT and IPTV across operational energy use, embodied carbon, electronic waste, infrastructure requirements and consumer equipment replacement before any final decision is made.

The Future of TV Distribution

I support the long-term evolution towards IP-based television distribution, provided the transition is driven by demonstrable readiness rather than predetermined dates.

In my view, the decision should be based upon objective evidence that the replacement system delivers:

- universal access regardless of income, age or location;
- resilience at least equivalent to the existing DTT network during emergencies;
- affordable consumer access without unnecessary equipment replacement;
- simple, intuitive systems suitable for users with limited digital confidence;
- robust cybersecurity and operational resilience;
- transparent environmental benefits demonstrated through whole-life assessment; and
  a competitive marketplace that encourages innovation without disadvantaging viewers.

As someone with experience planning major infrastructure programmes, I believe this transition should be managed using clear readiness criteria and evidence-based gateway reviews rather than fixed calendar dates. Major national

infrastructure changes are most successful when technical, operational and social readiness determine implementation, not when implementation is driven by an arbitrary deadline.

Finally, Government should remember that the purpose of television distribution is to serve the public. The success of any transition should therefore be measured by whether viewers retain reliable, affordable and resilient access to television services, rather than simply by whether legacy technology has been retired.

Here’s why:

These final questions are an opportunity to inject some engineering rigour into the consultation. I would avoid making claims about energy use that you cannot substantiate. Instead, focus on the need for Government to undertake a proper whole-life assessment before making such a major infrastructure decision.

I think Q31 is one of the strongest places in the consultation to draw on one’s professional experience. I am not simply expressing a preference, I am explaining **how major infrastructure programmes should be governed**. That gives my submission a perspective that is likely to stand out from many responses, because it focuses on programme assurance, readiness criteria and systems engineering rather than solely on broadcasting policy.

Question 32



Chapter 3.2 of the green paper sets out some of the challenges regarding the future of TV regulation, such as which TV-like services should be regulated going forward, and to what standard.

Is there any information or comment you would like to provide in relation to the future of TV regulation?

This is the end of this section. By moving forward in this survey, you will no longer be able to edit any of your responses to this section.

My answer:

The future regulatory framework should recognise that the distinction between traditional broadcasters and online media is becoming increasingly blurred. Regulation should therefore be based upon the nature of the service and the level of risk involved, rather than the technology used to deliver it.

However, regulation should remain proportionate. The United Kingdom has a long tradition of freedom of expression, and any future framework should begin with the presumption that lawful speech should remain lawful regardless of the platform on which it appears. Regulation should focus on clearly unlawful content, consumer protection, transparency and competition rather than attempting to shape public opinion by influencing the visibility or prominence of lawful content.

The regulatory framework should also recognise the growing importance of

independent creators, online journalists, podcasters and other digital media. Future policy should encourage a genuinely plural media environment in which audiences are free to choose between a wide range of lawful providers. Regulation should not unintentionally favour incumbent broadcasters over newer entrants or create barriers to innovation.

Where platforms make editorial or algorithmic decisions affecting the visibility of content, they should be transparent about the principles they apply and provide users with meaningful control over how content is presented. Transparency is preferable to opaque algorithmic intervention.

Any future regulation should also protect competition and consumer choice. Users should not be locked into particular ecosystems or devices, and interoperability and open technical standards should be encouraged wherever practical.

Finally, regulation should remain evidence-based and subject to regular review. Media technology is evolving rapidly, and regulatory frameworks should be sufficiently flexible to adapt without imposing unnecessary burdens that risk reducing innovation or limiting freedom of expression.

The ultimate objective should be a regulatory framework that protects consumers, promotes competition, preserves media plurality and safeguards the fundamental principle that citizens, not governments or regulators, should decide which lawful ideas, opinions and news sources they choose to engage with.

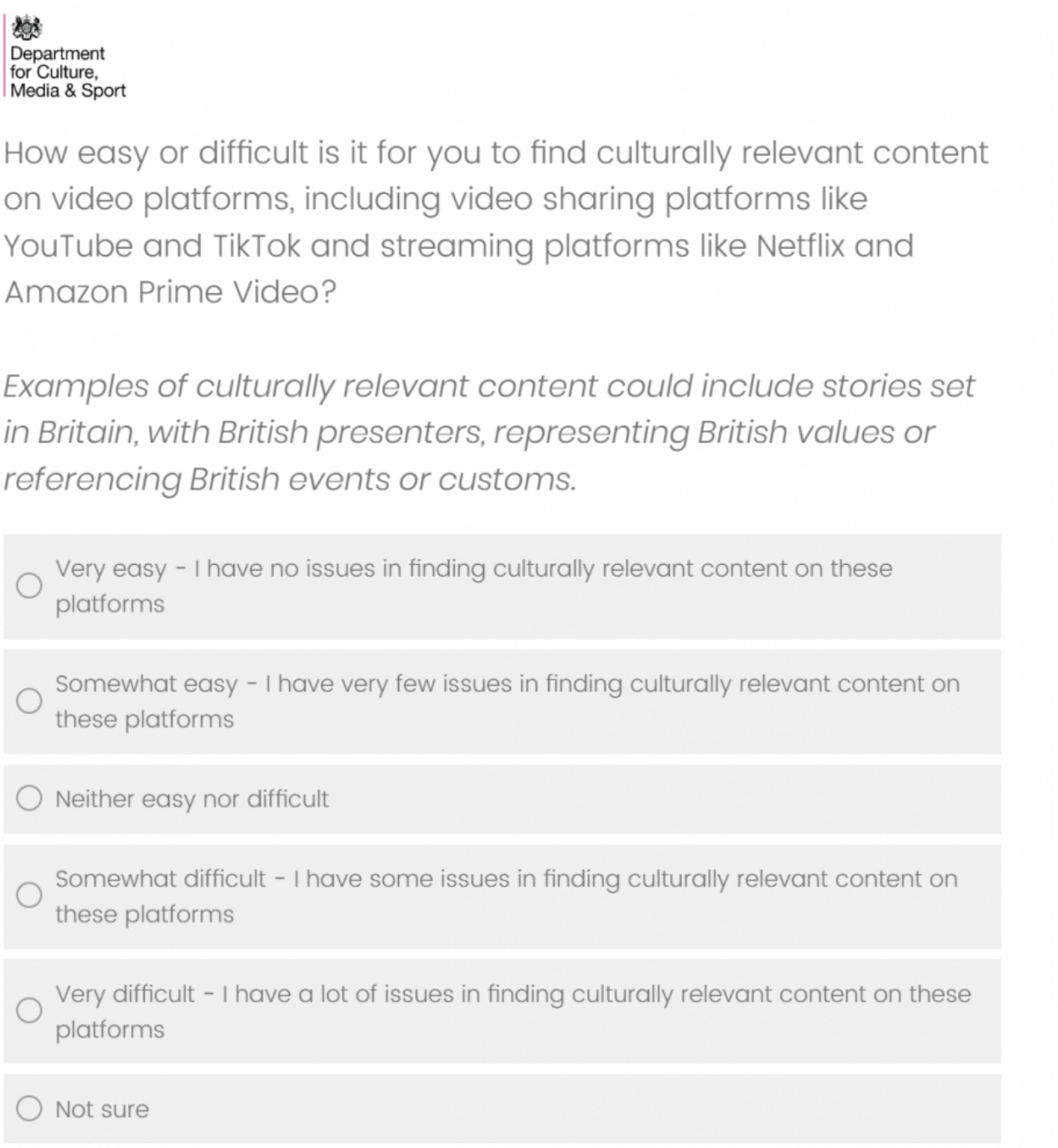
Government should regulate conduct, not opinion.

Here’s why:

This is a broad “catch-all” question, and it’s probably the best opportunity to bring together your themes on free speech, competition and regulation.

The final point ia a concise principle that captures my philosophy. Regulate fraud, incitement, illegal content, consumer rights and market fairness, but don’t regulate the relative visibility or acceptability of lawful viewpoints. It neatly distinguishes legitimate regulation from state influence over public discourse.

Question 33



My answer:

Very easy

Here’s why:

- YouTube has a huge amount of British content.

- Netflix, Prime, ITVX, BBC iPlayer, Channel 4 and others all carry substantial British programming.
- If you're interested in British history, politics, documentaries or current affairs, they're readily available.
- Recommendation algorithms generally become better the more you watch what interests you.

If there had been a comments box, I'd have kept it factual:

> *I have no difficulty finding content that is culturally relevant to Britain. The principal streaming and video-sharing platforms already provide extensive access to British films, television, documentaries, news, historical programmes and independent creators. Recommendation systems generally adapt well to users' viewing preferences, and audiences are able to search directly for content that reflects their own interests. I do not believe there is currently a shortage of British cultural content on these platforms.*

Question 34

Prominence can be defined as giving certain content a privileged position, for example, ensuring a specific channel appears at the top of search results or features on a recommendation feed, within a user interface so it is particularly easy for audiences to find and watch.

To what extent do you agree or disagree that content from public service media providers (like the BBC and Channel 4) should be easier to find on video platforms?

- ○ Strongly agree - it should definitely be easier to find public service media content on these platforms
- ○ Agree - it should probably be easier to find public service media content on these platforms
- ○ Neither agree nor disagree - no opinion either way
- ○ Disagree - it should probably not be easier to find public service media content on these platforms
- ○ Strongly disagree - it should definitely not be easier to find public service media content on these platforms
- ○ Not sure

My answer:

Disagree

Here's why:

This question goes right to the heart of one of the themes I've been arguing throughout the consultation.

Notice the wording:

"…should be easier to find…"

This isn't asking whether BBC or Channel 4 content should be **available** (it already is). It's asking whether it should receive **algorithmic or UI prominence** over other content.

I did not answer "Strongly disagree", because there is a legitimate public interest in ensuring PSM content is accessible. However, I don't think that justifies giving it preferential placement over other lawful content.

If there had been a comments box, I'd have written:

I believe Public Service Media content should be readily available on video platforms, but availability is different from algorithmic prominence.

Users should be able to find BBC, Channel 4 and other public service content easily by searching for it. However, I do not believe Government should require platforms to give particular lawful content preferential placement in search results, recommendation feeds or user interfaces.

Recommendation systems should primarily reflect users' interests and viewing choices. Artificially promoting one category of lawful content over another risks reducing user choice, distorting competition and undermining confidence in the neutrality of platform recommendations.

Public Service Media should compete successfully because audiences value its content, not because regulation gives it a privileged position within commercial platforms.

If Government believes certain public service content is of particular national importance, it should ensure that it remains available and discoverable through clear search functionality rather than by requiring algorithmic preference or preferential recommendation.

The guiding principle should be consumer choice. Users should remain free to decide what they watch, and platforms should be transparent about how recommendations are generated. Government should be cautious about

> *intervening in recommendation systems in ways that favour particular lawful providers over others.*

This is also entirely consistent with my earlier responses:

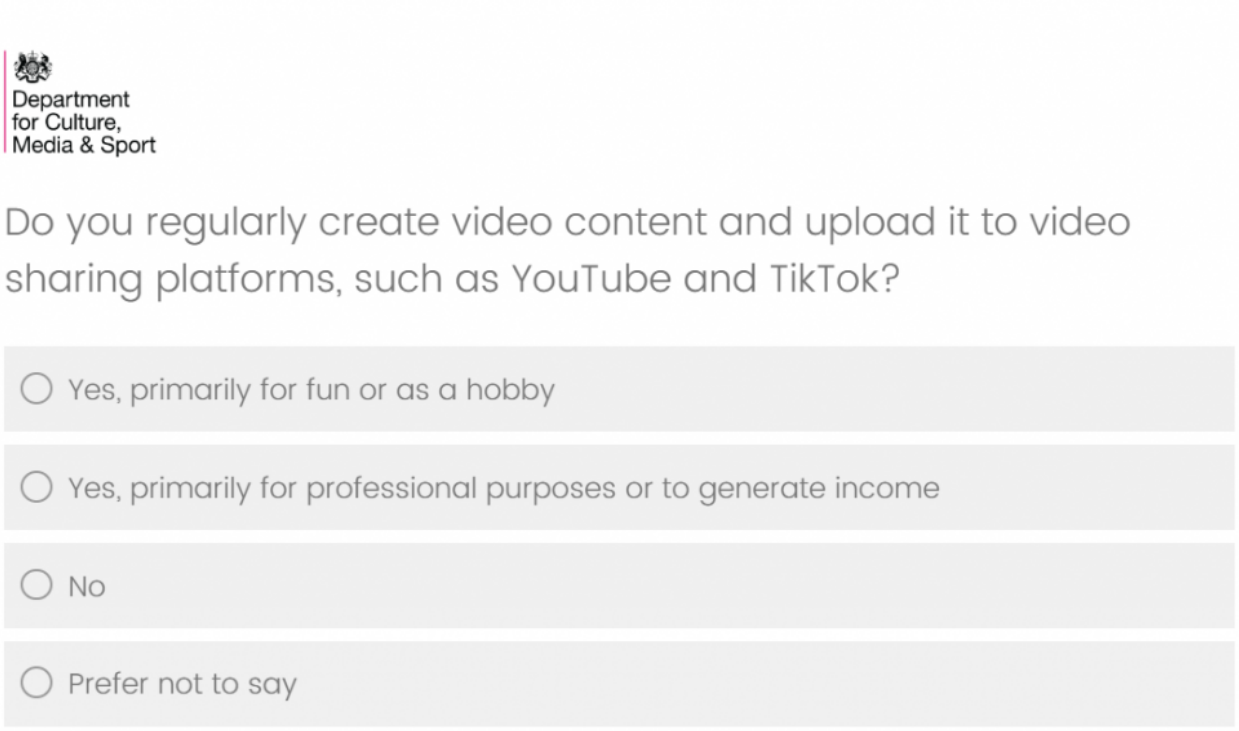
- Q15: **No** to promoting “trusted” news.
- Q16–17: Rejected the premise of government-directed prominence.
- Q32: Government should regulate conduct, not opinion.
- Q34: PSM should be **available**, but not **privileged**.

One subtle distinction that strengthens my argument is:

> ***Availability should be guaranteed; prominence should be earned.***

That neatly captures the balance between supporting Public Service Media and preserving user choice and fair competition.

Question 35



My answer:

No

Here’s why:

While I do own a YouTube channel in support of this website, it is small and very insignificant.

Question 36

Department for Culture, Media & Sport

Which of the following, if any, attributes of Public Service Media (PSM) content do you value the most? **Please select (up to) your top three.**

- [ ] Tailored to UK audiences - programmes that are specifically made for UK audiences, and are relevant to me
- [ ] Diverse programming - content that features people like me, and people from different backgrounds
- [ ] National cohesion - the broadcasting of events that bring the nation together for a shared viewing experience
- [ ] Shared viewing opportunities - programmes and broadcast events that I can watch and talk about with others, for example family or my peers
- [ ] Range - the availability of a range of different types of programmes (for example drama, comedy, entertainment, sport)
- [ ] Quality content (non-news) - programmes or content that you see as high quality and or different in their approach to what is offered by other providers
- [ ] Quality News - news content that is accurate, and helps me better understand what is going on in the world today
- [ ] Regional coverage - programming or content that keeps me informed about my area
- [ ] None of the above
- [ ] Not sure

My answer:

My selections were:

 1. Tailored to UK audiences

This aligns with my belief that Public Service Media should primarily serve the British public with content reflecting British life, history, institutions and culture.

 2. Quality content (non-news)

I have often praised good documentaries, history, science, engineering and factual programming. The BBC in particular still excels in some of these areas.

 3. National cohesion

Despite political differences, I have consistently argued that there are occasions when the whole country should be able to come together, major national events, remembrance, royal occasions, national emergencies and significant sporting events.

Why I wouldn’t choose the others:

** Diverse programming**

The wording is telling:

> *“…features people like me, and people from different backgrounds.”*

That is quite different from saying a diversity of ideas or subjects. It is about demographic representation. That does not reflect my priorities.

** Quality News**

I wouldn’t tick this because I have concerns about impartiality and institutional bias in broadcast news. I value **accurate** news, but I wouldn’t say PSM news is one of the three things I value most.

** Range**

Nice to have, but probably secondary to quality.

** Shared viewing opportunities**

A consequence of national cohesion rather than a priority in itself.

 Regional coverage

Useful, but didn’t make my top three.

I also notice something about the survey design

There is **no option** for:

- political impartiality;
- investigative journalism;
- holding power to account;
- editorial independence;
- factual accuracy (outside news);
- freedom from government influence.

Those are all attributes many people would associate with Public Service Media.

Instead, the options focus heavily on:

- identity,
- cohesion,
- cultural relevance,
- content genres.

That’s not necessarily wrong, but it does steer respondents towards a particular conception of what Public Service Media exists to do.

So my selections would be:

 Tailored to UK audiences
 Quality content (non-news)
 National cohesion

Those seem the closest match to my overall philosophy while remaining faithful to what the question actually asks.

Question 37 and 38

Department for Culture, Media & Sport

Chapter 4.2 of the green paper outlines the challenges public service media faces and how the system tied to broadcast licences is relatively inflexible. The chapter suggests this limits the options for benefits and obligations Ofcom can place on PSM providers, and makes it harder to open up the system to new providers. It is argued this risks the sustainability of the system as audiences move away from live broadcast TV to switch between linear, on-demand, and user-generated content on multiple devices.

To what extent do you agree or disagree with the suggestion that the public service media system needs to be reformed away from the current model that uses broadcast licences?

- ◯ Strongly agree - the system definitely needs to be reformed away from using broadcast licenses
- ◯ Agree - I agree that the system may need to be reformed away from using broadcast licenses
- ◯ Neither agree nor disagree - No opinion either way
- ◯ Disagree - I do not agree that the system necessarily needs to be reformed away from using broadcast licenses
- ◯ Strongly Disagree - I feel strongly that the system should continue to use broadcast licenses
- ◯ Not sure

Please provide a reason and any supporting evidence for your view.

My answer:

Agree – I agree that the system may need to be reformed away from using broadcast licences.

Reasons:

I agree that the regulatory framework should evolve as audience behaviour changes. The existing system of broadcast licences was developed when television was delivered primarily through a limited number of linear broadcast channels. Today's media environment is significantly more diverse, with audiences consuming content across terrestrial television, IPTV, streaming services and video-sharing platforms.

However, reform should focus on modernising the regulatory framework rather than weakening the underlying public service obligations. Public Service Media should continue to deliver content that serves the public interest, but regulation should become more technology-neutral and apply according to the nature of the service rather than the method of delivery.

Any new framework should encourage innovation and allow new providers to participate where appropriate, while preserving important public service objectives such as universal availability, accessibility, emergency communications, impartial news obligations where they apply, and high-quality UK programming.

Care should also be taken to ensure that regulation remains proportionate. Traditional broadcasters operate under significantly greater regulatory obligations than many online competitors. As media converges, Government should avoid creating unnecessary distortions while recognising that different types of services present different levels of public interest and consumer risk.

Finally, regulatory reform should not be used as a mechanism to influence editorial decisions or the prominence of lawful content. The primary objectives should be consumer protection, fair competition, transparency and universal access, while allowing audiences to decide for themselves what content they wish to watch.

Here’s why:

Why I think “Agree” is the best answer

My responses throughout the consultation have followed a consistent pattern:

- **Modernise** where technology has moved on.
- **Keep** the public-interest principles.
- **Avoid** expanding state influence over what people see or watch.

This answer fits that philosophy. I’m not defending an outdated licensing mechanism simply because it’s traditional, nor am I supporting wholesale deregulation. Instead, I’m saying:

> ***Modernise the means, preserve the principles.***

I think that’s a balanced position that policymakers are likely to take seriously because it recognises both technological reality and the continuing importance of public service obligations.

Question 39

Department for Culture, Media & Sport

The green paper outlines four potential principles of the public service media (PSM) system. In brief, these are:

- **Universality:** to ensure that public service content remains universally available, free of charge, reflecting audience behaviours and media consumption habits.
- **Public service content:** to ensure provision of a wide range of high quality, distinctive public service content.
- **Systemic sustainability:** to ensure the system of public service media has a mix of providers to increase its resilience to deliver public service media objectives in the long-term. It should also be sufficiently flexible to the potential shifts of the current collection of PSM providers and be open to opportunities of mergers, partnerships, and definitions of public service content.
- **A sustainable PSM compact:** to ensure the benefits PSM providers receive are proportionate to the obligations they must deliver for PSM status so as to be attractive and commercially sustainable.

To what extent do you agree or disagree that each of the following should be considered by government as principles of the public service media system?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Not sure
Universality	○	○	○	○	○	○
Public service media content	○	○	○	○	○	○
Systemic sustainability	○	○	○	○	○	○
A sustainable public service media compact	○	○	○	○	○	○

My answer:

Principle	Suggested answer	Reason
Universality	Strongly agree	Public service content should remain universally accessible, free at the point of use where appropriate, regardless of income, age or location.
Public service content	Agree	High-quality public service content remains important, but quality and distinctiveness should be determined by audience value, not ideological or political objectives.
Systemic sustainability	Agree	The system should be flexible and open to new providers, but not simply preserve incumbent organisations. Competition and innovation should be encouraged.
A sustainable PSM compact	Agree	If organisations are expected to fulfil public service obligations, it is reasonable that benefits and obligations remain proportionate. However, those obligations should be periodically reviewed to ensure they continue to serve the public interest.

Here’s why:

I would **strongly support Universality** because it aligns with everything I’ve said throughout the consultation:

- public service should be available to everyone;
- nobody should lose access because they’re elderly, rural or on a low income;
- technology should serve the public.

The other three I’d simply mark **Agree**.

Why not “Strongly agree”?

Because there are important caveats.

For **Public service content**, I’d want to add:

> *Public service content should include impartial news, high-quality factual programming, educational content, arts, science, history, children’s programming and events of national importance. It should not become a vehicle for promoting particular political or ideological viewpoints.*

For **Systemic sustainability**:

> *Sustainability should not mean protecting existing institutions from*

competition. New entrants should be able to qualify where they can demonstrably deliver public service objectives.

For **A sustainable compact**:

Benefits should only exist where they are genuinely linked to measurable public service obligations. The system should be transparent, proportionate and subject to periodic review.

If there had been a comments box I'd probably have written something like this:

I support these principles in general, provided they remain focused on serving the public rather than preserving particular institutions.

Universality is the most important principle. Public service content should remain accessible to all citizens regardless of income, age, disability or location.

Public service obligations should also remain focused on genuinely serving the public interest through high-quality news, education, children's programming, factual content, culture and events of national significance. These obligations should not be used to justify political advocacy or ideological objectives.

The regulatory framework should be sufficiently flexible to allow new providers to participate where they can meet public service requirements. Competition, innovation and plurality should strengthen the system rather than being seen as threats to it.

Finally, any benefits afforded to Public Service Media providers should remain proportionate, transparent and directly linked to the public service obligations they undertake.

Overall, I think these principles are more balanced than some of the earlier questions. The only subtle point I'd be careful of is that **"systemic sustainability" should not become synonymous with preserving the existing broadcasters**. The principle should be to sustain **public service**

broadcasting as a function, not necessarily every current provider in its current form. That distinction is worth maintaining.

Question 40

The green paper outlines three illustrative models for our public service media (PSM) system to align with our proposed principles. These models are outlined below, and a more detailed description on each is presented in chapter 4 of the green paper.

- A model focused on PSM institutions would see institutions, such as broadcasters or streamers, designated as PSM institutions.
- A model focused on PSM services would allow specific 'services' to receive PSM designation if they were to meet agreed requirements. In this context, 'services' could range from linear provision, such as an arts-focused TV channel, a high quality VoD service, or channels on video sharing platforms, such as a history or documentary channel on YouTube.
- A content-centric approach would determine whether something is public service content subject to an agreed definition (which could evolve in line with cultural/societal needs) rather than a particular provider (institution or service).

Please rank, in order, your preferred model of the public service media (PSM) system, where 1 is your most preferred model.

A model focused on PSM institutions	
A model focused on PSM services	
A content centric approach	
A combination of the illustrative models	

Do you have any further comments you would like to add on the content covered by this chapter, or any further information that will aid us in interpreting your responses?

My answer:

I ranked them as follows:

1. **A model focused on PSM services**
2. **A combination of the illustrative models**
3. **A content-centric approach**
4. **A model focused on PSM institutions**

Further Comments:

Public Service Media status should be earned through the delivery of clearly defined public service objectives rather than automatically attaching to particular organisations. A service-based approach would encourage innovation, competition and plurality while maintaining high standards. New entrants should be able to qualify if they consistently provide genuine public service content, and existing providers should continue to demonstrate that they meet those obligations.

The criteria for designation should be objective, transparent and politically neutral. They should focus on measurable public value such as accuracy, educational benefit, children's programming, cultural content, accessibility and universal availability, rather than protecting incumbent organisations or reflecting the political priorities of the government of the day.

Above all, Public Service Media should serve the public interest rather than institutional interests. The regulatory framework should encourage excellence, innovation and public value regardless of who provides the service.

Here's why:

1. PSM services (Best)

This rewards what is actually delivered rather than who delivers it.

If a broadcaster, streaming service or even a YouTube channel consistently provides genuine public service programming, it should be eligible. Equally, if a traditional broadcaster stops delivering those services, it should not receive automatic privileges simply because of its history.

This encourages innovation and competition while keeping standards high.

2. Combination

There will inevitably be some overlap. Certain institutions may continue to provide important services, while some individual programmes or channels from outside those institutions may also deserve recognition.

3. Content-centric

The principle sounds attractive but becomes difficult in practice.

Who decides whether a particular documentary or news programme qualifies as "public service content"?

Unless the criteria are extremely objective, this risks politicisation and subjective judgement.

4. Institution-based (Worst)

This largely preserves the existing system.

Public Service Media status should not become a permanent entitlement attached to historic broadcasters. Institutions should have to continue earning that status through what they actually provide.

Question 41

Department for Culture, Media & Sport

There is a duty on public authorities to consider how their policies or decisions affect people with protected characteristics under the Equality Act 2010. Do you have any evidence of the equalities impacts of any proposals set out in this consultation?

My answer:

I do not have specific empirical evidence, but there are several equality considerations the Government should assess carefully.

Any transition from Digital Terrestrial Television to IPTV must not disadvantage older people, disabled people, those on low incomes, or those living in areas with poor broadband coverage. Universal access to television and emergency information should be maintained regardless of age, disability, income or geographic location.

Accessibility features such as subtitles, audio description, screen-reader compatibility and simple user interfaces should be available as standard. Any replacement equipment should be affordable and straightforward to install, with appropriate support available where needed.

Equality considerations should also extend to freedom of expression and viewpoint diversity. Policies intended to promote certain categories of content should not unintentionally disadvantage lawful creators, journalists or audiences holding minority or unpopular opinions. Public authorities should ensure that equality duties are applied consistently and in a politically neutral manner, protecting equal access to media rather than favouring particular viewpoints.

Any Equality Impact Assessment should therefore consider both physical accessibility and the potential impact of policy on equal participation in public

debate.

That concludes the consultation questionnaire.