

August 2026

CCIA Response to the UK Government Green Paper Consultation on the Future of Television and Media

Note deadline: 31 August 2026

Public Consultation Response form

1) Which sections of this consultation would you like to answer questions about? Please select all that apply.

- X Section 1: Market and audience context
- X Section 2: Prominence of news on social media
- X Section 3: Media literacy duty and joint venture
- X Section 4: Future of TV distribution
- X Section 5: Future of TV regulation
- X Section 6: Prominence of public service media in the platform age
- X Section 7: A new system of public service media
- X Section 8: Equality impact

2) 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?

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit trade association representing a broad cross section of computing and communications firms. CCIA has advocated for open markets, open systems and open networks for over fifty years. Its members include streaming services, video sharing platforms and connected device operators active in the UK.

There is common ground on the starting point. A well-informed public supports a range of public goods from health outcomes to democratic accountability. One prerequisite to the public becoming well-informed is easy access to trusted (and trustworthy) sources of news.

CCIA is concerned, however, that several of the proposals in the Green Paper do not follow from that starting point. In particular:

- It is not clear that consumers using digital services find it difficult to access trustworthy news and many do so.
- It is not clear that promoting the interests of PSBs or a wider set of “trusted” sources (depending on the proposal in question) would be the best way to increase trust or access to trustworthy news sources.

CCIA members have a strong interest in sustaining trust in the digital services which they operate and many do so through existing work to promote trustworthy sources. Any intervention should go with the grain of those existing efforts.

By contrast, the extension of prominence and must-carry obligations from device interfaces into online video services and other digital platforms would represent a flawed transposition. Prominence obligations at device level operate on the placement of services within an interface, and are already demanding obligations for those subject to it. Extending the concept into online video services would mean intervening in how content is ranked and recommended to individual users, which is a different obligation with a range of different consequences, not a stronger version of the same requirement. CCIA sets out at questions 22 and 30 why it considers the case for that step has not been made, and why the evidence assembled in the Green Paper itself points away from it.

Public service media content is already discoverable on the services these proposals would cover. The BBC has over 60 million followers on Facebook, and its principal channels on YouTube cover over 30 million subscribers. ITV reports UK views across its YouTube network up 51 per cent year on year in 2025. These positions were built commercially. The BBC and YouTube partnership announced in January 2026 commits the BBC to producing programming specifically for the platform rather than repurposing broadcast material, and includes new channels for children and young audiences alongside a UK creator training programme. The ITV and YouTube arrangement, the BBC and S4C streaming partnership and Freely passing one million weekly users in December 2025 were each agreed without a statutory prominence requirement, several while the Media Act 2024 framework was still being implemented. Whether public service media occupies the position it held before the internet is a different question, and the answer is plainly no. But that is a question about share of attention in a market with far more competitors, not about whether audiences can find this content. The Green Paper does not distinguish between the two, and the case for intervention depends on which one is the problem.

CCIA welcomes the position, confirmed in the Written Ministerial Statement of 23 June 2026, that the Government will pursue “industry-led, voluntary agreements to achieve increased prominence”, and legislate only “should these partnerships not go far enough”. On the evidence above, they are going a considerable distance already. It is important that potential legislation does not undermine a current and ongoing process (by encouraging some parties to avoid compromise, pending a legislative resolution). The Government should avoid an open-ended sense of what “far enough” means, be clear on when it expects to make that judgement and not pre-judge whether any outcome (including the parties not striking additional deals) represents a rationale for regulatory intervention.

The Green Paper skips over two distinct propositions: Making attractive content appropriate to the users and the context in which they access content will produce content which digital services will enable users to discover. Digital services can work with PSBs to help them create such content, resulting in a genuine “win-win” collaboration.

Requiring services to artificially elevate a designated list of providers within their ranking and recommendation systems, by contrast, makes those services less responsive to user interests and promotes content they are less likely to engage with sustainably. It is therefore a worse than zero sum intervention that will frustrate users (and undermine the ability of regulated services to compete with any unregulated substitutes). The broad range of potential user responses to such an intervention is itself a reason for caution in any intervention. Users who are served designated content they did not seek may skip or block those channels, which would leave that content seen less often than before the intervention rather than more. Some will be confused about why their recommendations have changed, and some will use the service less as a result. Others will conclude that what they are shown no longer reflects their own preferences, which erodes trust in the service and, by extension, in the content surfaced through it. Interventions which produce those responses work against the objectives of the Green Paper.

Three further points frame the remainder of this response.

First, the Green Paper contains two distinct prominence proposals which promote different kinds of content in different ways and therefore raise different issues. Chapter 2.2 concerns prominence for trustworthy news on social media, where the Government has said it will explore legislative options and where the defining criteria are expressly undetermined. Chapter 4.1 concerns prominence for public service media content on third party platforms, where the Government's stated preference is voluntary agreement. CCIA has addressed each on its own terms and would encourage the Government to maintain that distinction as the work develops, since a measure designed for one would not be well suited to the other.

Second, definitional questions matter more than their treatment in the Green Paper suggests, and they sit differently across the two proposals. On prominence for trustworthy news, the provider category is genuinely undetermined. The Green Paper says as much, and offers the recognised news publisher definition at section 56 of the Online Safety Act 2023 as a possible starting point. That definition was drafted for a different purpose, to exempt news publisher content from safety duties, in a context where over-inclusion is seen as the lesser risk. Prominence inverts that. Over-inclusion could risk diluting the benefit to the point of meaninglessness, or simply a bias for corporate media against individual creators, while under-inclusion would mean Ofcom or some other regulatory body picking winners in the news market. There are likely to be extremely contentious debates over the boundaries wherever they sit, with an arbitrary but commercially existential distinction between those that just meet and just do not meet the requirements.

On prominence for public service media content, the provider category is settled. The six PSM providers are named (the BBC, ITV, Channel 4, Channel 5, STV and S4C), their status is set in law, and there is no ambiguity about who they are. The definition challenges are rather which services provided by those PSMs would be within scope, and would carry any

obligation, where the Green Paper's reference to “other platforms” is left open and DCMS both needs to define video-sharing services and consider what else might be included. This is going to produce a serious dilemma where including more services will increase the cost of the measure, while including fewer will likely mean unregulated substitutes displacing regulated platforms.

It also remains unclear what prominence would require in practice for services which surface content in materially different ways, a question on which the Green Paper offers principles rather than specification. To require that something be prominent, you have to say prominent where. That means describing how a service is laid out, and any description would be drawn from the services that exist when the rule is written. A rule drafted a decade ago would have assumed a home page and a list of channels. It would have had little to say about services that arrive afterwards and work quite differently. Video sharing and social media platforms have evolved considerably in the past and are likely to continue to do so in the future as companies innovate and consumer tastes change. Inflexible requirements are likely to become less effective and more obstructive of innovation over time.

Chapter 4.2 then proposes to reopen the one element which is currently clear, by extending designation to new providers or to individual services. A policy settlement based ultimately on whether a provider was historically a terrestrial broadcaster does not seem a stable basis for a company being privileged in ranking algorithms for the foreseeable future. This boundary seems politically untenable when it puts other providers that are just as trustworthy at a commercial disadvantage. However any attempt to set this boundary will involve arbitrary decisions over which services are included, and benefit from artificial prominence, at the margin.

Third, these proposals arrive alongside the Online Safety Act regime and its subsequent additions from June 2026, the digital markets competition regime, the forthcoming consultation on digital replicas and the AI labelling taskforce. Whilst each may be right or wrong when considered on its own, the Government has pledged to cut the administrative cost of regulation on business by a quarter (indeed the Green Paper restates that pledge). CCIA would encourage the Department to assess the combined compliance cost of these regimes on the same services, rather than assessing this proposal against a baseline which assumes the others are not in place.

3) 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?

The Green Paper notes that lower barriers to entry are enabling producers and rightsholders to reach audiences directly, that demand for formats such as video podcasts and platform originals is likely to increase, and that UK production companies are well placed to benefit. Measures directed at the commissioning economy should be designed so as not to disadvantage producers pursuing these kinds of more direct to consumer routes, which now form part of the media ecosystem rather than sitting outside it.

The UK's production sector also depends on international distribution. Pact's 2025 export figures show UK television performing strongly in overseas markets, and the global services which carry that content are the same services contemplated as facing additional potential requirements in the prominence proposals.

Many platforms are also investing directly in the UK sector. In August 2026 YouTube announced a further £3 million commitment to the UK industry, highlighting that the platforms such as YouTube increasingly supply the sector with talent, audiences and revenue. Similarly, Amazon has put more than £4.2 billion into the UK's creative industries since 2010. This is in addition to Amazon's acquisition and redevelopment of Bray Film Studios in Berkshire, and its long-term lease at Shepperton. Apple's investment in the UK has exceeded £18 billion over five years, with UK production for Apple TV+ tripling in the two years to 2024. This is the mixed financing ecology in practice. International investment of this kind sits alongside domestic commissioning rather than displacing it, reaching parts of the UK where production capacity has historically been challenging.

The UK is one of the world's leading destinations for film and television production, and reform should reinforce rather than undermine the conditions that support investment, audience choice and continued innovation across the audiovisual sector. The Government should weigh the impact of any reform on investment, innovation and the UK's international competitiveness, including scenarios where other countries emulate or respond to new UK requirements in ways that diminish overall openness in global audiovisual markets.

On commissioning and rights, global streaming services operate a range of contractual models rather than a single template. Commissioners are flexible on rights, and there is no ranking of value between different forms of cooperation. Where a producer wants to work with a commissioner, or the reverse, streaming services are open to discussing flexible rights arrangements.

The allocation of rights in any deal also reflects the allocation of risk. Where the commissioner bears the full production cost, it is reasonable that they retain the associated rights. Mandatory rights reversion after a fixed period, without adjustment to the financial

terms, would convert a fully funded commission into a short-term licence while leaving the commissioner carrying the entire upfront financial burden. That would be economically unsustainable and would ultimately reduce the volume of content commissioned in the UK.

CCIA would encourage the Government to protect the mixed financing ecology that has developed, in which domestic commissioning and international investment operate alongside one another, rather than pursuing interventions which might reduce that diversity.

4) How often do you encounter news you feel is untrustworthy when online (for example, something you consider to be misinformation)?

- ☐ Never
- ☐ Rarely
- ☐ Sometimes
- ☐ Often
- ☐ Very Often
- ☐ Not sure

5) Do you believe 'trustworthy' news content should be more visible on social media?

- ☐ Yes
- ☒ No
- ☐ Not sure

6) If the government gives prominence to trustworthy providers of news (i.e. by making them more visible online), should this prominence be ongoing, and 'always on,' or only active during periods of heightened vulnerability?

- ☐ Ongoing and 'always on'
- ☐ Only active during periods of heightened vulnerability
- ☒ Not sure

7) Do you feel individual users should be given an option in whether prominence measures for trustworthy news content are switched on or off for them?

- ☒ Yes - users should be given an option in whether prominence measures are switched on or off for them
- ☐ No - users should not be given an option in whether prominence measures are switched on or off for them
- ☐ Not sure

8) ~~How concerned, if at all, are you about the impact of misleading or unreliable information on society?~~

- ☐ ~~Very concerned~~
- ☐ ~~Somewhat concerned~~
- ☐ ~~Not very concerned~~
- ☐ ~~Not at all concerned~~
- ☐ ~~Not sure~~

9) ~~How concerned, if at all, are you about the impact of misleading or unreliable information on democracy?~~

- ☐ ~~Very concerned~~
- ☐ ~~Somewhat concerned~~
- ☐ ~~Not very concerned~~
- ☐ ~~Not at all concerned~~
- ☐ ~~Not sure~~

10) Public Service Media refers to organisations such as the BBC, ITV, Channel 4 and S4C.

Which of the following statements most closely reflects your view on the role of Public Service Media in helping people critically engage with news and other information they encounter online or offline?

- ☐ Public service media has a role in supporting critical engagement, and is currently doing enough
- ☐ Public service media has a role in supporting critical engagement, and should do more
- ☐ Public service media does not have a role in supporting critical engagement
- ☐ Public service media is currently doing too much to support critical engagement, and should do less
- ☒ Not sure

11) ~~How important, if at all, do you think it is for people to be able to judge the accuracy and reliability of information they encounter, for example online or in the news?~~

- ☐ ~~Very important~~
- ☐ ~~Somewhat important~~
- ☐ ~~Not very important~~
- ☐ ~~Not at all important~~
- ☐ ~~Not sure~~

12) How valuable, if at all, do you believe collaboration between Public Service Media, civil society organisations (for example charities and education groups), and the media sector could be in supporting people to critically assess information?

☒ Very valuable

- ☐ Somewhat valuable
☐ Not very valuable
☐ Not at all valuable
☐ Not sure

13) Which of the following models, if any, do you consider most effective for further media sector collaboration in this area? [select all that apply]

☐ A structured forum with agreed objectives and reporting

☒ Informal coordination and sharing of learning

☒ Joint delivery of public-facing initiatives

- ☐ No additional collaboration is needed
☐ Not sure

14) 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

15) 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.

CCIA supports the Government's case for change and the 2034 timeline. Consumer behaviour has already shifted decisively towards internet-delivered viewing, and maintaining legacy infrastructure beyond its useful life serves neither audiences nor the public interest.

A supported transition would also do more than change how television is delivered. It would help equip digitally excluded households with the connectivity, devices and confidence to reach services well beyond broadcasting, which narrows the digital divide and supports growth in the wider digital economy.

CCIA suggests that the timeline should be matched by genuine readiness on affordable broadband suitable for television viewing, low-cost devices, accessibility features and digital skills support. Those are deliverable by 2034 with the right planning, and CCIA members are among the device and platform operators on whom the transition would depend.

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

CCIA does not propose an alternative date. We would note that Annex C indicates the likely costs of clearing digital terrestrial television from the 600 MHz band in 2035 are substantially lower than the benefits to mobile network operators. Additionally, there would be merit in committing to continuing clearing the spectrum where digital terrestrial television operates beyond 2034. The spectrum question and the switch-off question can be decided each on their own terms.

17) To deliver an IPTV transition would require collaborative working with audience groups, industry and across Government. Please outline your organisation's commitment to supporting this work, including relevant experience, resources, and innovative solutions as to how you would deliver this transition.

CCIA supports continued engagement between government, industry and stakeholders as plans for future television distribution develop. Our members have extensive experience in

delivering internet-based technologies and would welcome the opportunity to contribute to future discussions on the technical considerations involved.

18) To what extent do you agree or disagree that the challenges identified in the green paper (delivering for all audiences; maintaining a reliable television service; promoting competition and innovation in the television industry and supporting a sustainable future for PSM providers) capture all of the considerations when making a decision on whether, and how best, to support audiences to adopt IPTV and other similar technologies?

- ☐ Strongly agree - the challenges comprehensively capture all of the considerations
- ☐ Agree - the challenges capture all of the considerations
- ☐ Neither agree nor disagree - no strong opinion either way
- ☒ Disagree - the challenges do not capture all of the considerations
- ☐ Strongly Disagree - the challenges definitely do not capture all of the considerations
- ☐ Not sure

19) In your opinion, which, if any, of the challenges outlined in the Green Paper are most important to you.

Please rank in order of importance, where 1 is the most important to you.

Rank: 2 Delivering for all audiences - Any transition to IPTV and other similar technologies must preserve universal access to TV, including public service media providers, regardless of income, location, age, or digital confidence.

Rank: 3 Maintaining a reliable television service - The ability to communicate to the public in a national emergency must be retained beyond a move to IPTV. Before digital terrestrial television is switched off, industry must show that alternative technologies can deliver comparable or better standards of reliability, resilience, and coverage.

Rank: 1 Promoting competition and innovation in the TV industry - A managed transition to IPTV and other similar technologies offers an opportunity to modernise TV delivery, the transition should free up resources and spectrum, and allow broadcasters to focus on content and innovation rather than maintaining parallel legacy systems.

Rank: 4 Supporting a sustainable future for public service media providers - public service media providers play a central role in the UK's cultural, civic, and democratic life. Industry must ensure that new distribution models support, rather than undermine, public service media providers' ability to play this role.

20) 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.

Rank: 2 Low cost or subsidised broadband for people receiving benefits or on low incomes

Rank: 6 Services and systems that feel the same as digital terrestrial television so they are easy to use for people with limited digital skills

Rank: 1 Affordable broadband for all, suitable for television viewing

Rank: 4 Simple devices that connect older television sets to the internet with no ongoing fees

Rank: 3 Built-in, easy to use accessibility features for disabled users, for example subtitles and audio description

Rank: 5 Digital skills required to navigate or set up IPTV

Rank: 7 Low cost or discounted internet capable television sets for people on low incomes

21) 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.

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

The transition to IP-based distribution should not become a vehicle for extending prominence or must-carry obligations from device interfaces into online video services, recommendation systems or other digital platforms. The Media Act 2024 established prominence at the device level for designated services such as BBC iPlayer, ITVX and Channel 4 Stream. Ofcom's draft Code of Practice, published in January 2026, implements that framework and sets out detailed requirements for placement within navigation menus, curated rows and search. Separately, Ofcom's 2025 Public Service Media Review invited the Government to explore prominence for news on social media and other platforms, which is a distinct proposition operating on different services.

They are not continuations of one another. Device-level prominence governs the placement of services within an interface, and is already a demanding obligation for those subject to it. Prominence within an online video service is a different kind of obligation. Recommendation, search and ranking systems are interactive, personalised and continuously responsive to what users do, and a requirement to elevate designated material within them means overriding the preference signals that make the service useful to audiences and to creators alike.

DCMS should also consider the international implications of the UK pursuing an intervention of this sort. There is also a further consideration that a precedent for prominence obligations of this kind is one that other jurisdictions may follow. It is worth noting that mandated prominence for designated news providers within recommendation systems is, so far as CCIA is aware, unprecedented among comparable democracies, and we understand that the European Union considered measures of this kind during the development of the Digital Services Act without proceeding with them.

Other governments have pursued local content quotas, investment requirements and pre-installation mandates, and where they do, British content and British creators are displaced in those markets to make room for locally designated providers. The UK has a particular interest in championing open distribution rather than following the protectionist direction visible elsewhere, because its media sector exports more successfully than most and does so through the same global services these proposals would require to prioritise domestic providers. If this approach were replicated across a significant number of markets, including many where the equivalents of the PSM providers are protected from foreign ownership, the UK could lose out overall.

It is also worth being clear about the state of the news ecosystem which is currently producing more journalism, not less. New specialist, local and investigative independent outlets have emerged, almost all built on digital-native models and reaching audiences through the services these proposals would regulate. Prominence would back incumbents whose difficulty is adapting rather than being found, at the expense of the newer entrants doing the adapting.

One aspect of the transition the Green Paper does not address is what preserves the universal guide function once distribution is entirely internet delivered. Digital terrestrial

television currently provides a single, neutral interface through which every household can see the full range of channels available to them, and nothing in the Green Paper sets out what performs that role in an IPTV environment. This matters for audiences rather than only for industry. If scheduling and programme metadata are available only through a limited number of routes, viewers would move between separate applications each showing part of what is available, making content discovery harder rather than easier. Where that metadata is available on fair, transparent and equivalent terms, platforms can build discovery tools across the full range of services and compete on the quality of what audiences are offered. CCIA would encourage the Government to consider this as part of transition planning.

Prominence obligations should not be extended into online services, particularly in the form of interference with ranking algorithms. This is not an argument against the objective; rather, the Department should consider whether the instrument fits its objectives, and that the costs of using it anyway would fall substantially on parties the Green Paper does not consider.

The Government should keep the distribution question and the prominence question separate, and consider the scope of the term “other platforms” before it is carried into any further work. There is a risk that this leads to an unintended extension of the scope of any intervention beyond video sharing services to news aggregators, podcast services, social networks and voice assistants, which surface content in materially different ways and for which a single specification of prominence would not be workable. Many services already operate crisis protocols, which have been developed and refined over successive incidents, which surface authoritative information at moments of acute public need. The Green Paper is unclear on what a statutory prominence duty would add to arrangements which already exist and already work.

News aggregators illustrate the point. Chapter 2.2 is directed at social media platforms and, potentially, video sharing platforms. Aggregators are of a different character. They surface content in response to a user's request and their own selection of sources, and many operate on licensing arrangements agreed directly with publishers, including public service media providers. A requirement to elevate designated providers has no clear application to a service which the user has already configured to reflect the publishers they want. CCIA reads the Green Paper as not intending to bring aggregators within scope, and would welcome confirmation of that in the Government's response to this consultation.

23) 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?

On the standard to which TV-like services should be regulated going forward, the Green Paper describes the present position as unfair and uncompetitive, with high standards for

licensed broadcasters and mainstream on-demand services, lower standards for video sharing platforms under the Online Safety Act, and little or no regulation elsewhere. This treats as an accident of history a difference which reflects the nature of the services themselves. Broadcast content standards assume editorial control over a finite schedule. Due impartiality, the watershed and pre-transmission compliance are all premised on that assumption. They cannot be transposed to services carrying user-generated content at a scale where each item is not and cannot be reviewed before it appears. To the extent that similar requirements are appropriate for more similar online services, where editorial control is also exercised, those requirements are being extended under existing Media Act 2024 compliance efforts (i.e. Tier 1 duties for video-on-demand services). By contrast, the Green Paper notes that more than twenty million videos are uploaded to YouTube each day. The Online Safety Act was designed for that content and regulates systems and processes with a requirement for proportionate, risk-based interventions for that reason. Levelling standards upward in name would in practice mean an impractical and disproportionate burden on a fundamentally different kind of platform.

Chapter 1.6 rightly notes that any new TV-specific regulation will need to work alongside the online harms and other regulatory regimes. The Government should treat that as a precondition to proceeding with policy in this area, rather than a subsequent adjustment. The existing division is broadly coherent. Mainstream on-demand services designated on 1 April 2026 fall under the video-on-demand standards code Ofcom is now consulting on. Services carrying user-generated content fall under the Online Safety Act, which already contains provisions relating to news content whose implementation is itself under consultation. A new TV-like framework would sit across that division and risk reaching services on both sides of it. Given the Government's overall commitment to reduce the administrative cost of regulation, Ofcom should map what a new framework would add to each group before it is designed, and ensure any new duties are risk-based measures appropriate and proportionate for new platforms, not overlapping with existing regulatory frameworks.

On Ofcom's powers, CCIA supports the objective of a framework which can adapt to changes in technology and business models. Flexibility and predictability are in tension, and the balance matters for investment. Where new powers are conferred, the Government should define their scope on the face of the legislation rather than leaving the boundary to be settled through guidance, and keep the routes of appeal and review proportionate to the breadth of the discretion granted.

On accessibility, the objective of enabling all audiences to enjoy all kinds of video services is right. Popular digital services have invested substantially in subtitling, audio description and navigation features, including capabilities which were not technically possible on digital terrestrial television. Progress in this area has come largely through open standards and interoperability across devices and services and developing on a global basis, diluting fixed costs across large numbers of users and making it economical for rarer needs to be accommodated. DCMS should encourage that process, rather than specify features in UK specific legislation, which risks fixing today's technology in place.

24) How easy or difficult is it for you to find culturally relevant content on video platforms, including video sharing platforms like YouTube and TikTok and streaming platforms like Netflix and Amazon Prime Video?

Examples of culturally relevant content could include stories set in Britain, with British presenters, representing British values or referencing British events or customs.

- ☐ Very easy - I have no issues in finding culturally relevant content on these platforms
- ☐ Somewhat easy - I have very few issues in finding culturally relevant content on these platforms
- ☐ Neither easy nor difficult
- ☐ Somewhat difficult - I have some issues in finding culturally relevant content on these platforms
- ☐ Very difficult - I have a lot of issues in finding culturally relevant content on these platforms
- ☐ Not sure

25) 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

26) Do you regularly create video content and upload it to video sharing platforms, such as YouTube and TikTok?

- ☐ Yes, primarily for fun or as a hobby
- ☐ Yes, primarily for professional purposes or to generate income
- ☐ No
- ☐ Prefer not to say

27) 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.**

- ☐ 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
- ☐ 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)
- ☐ Regional coverage — programming or content that keeps me informed about my area
- ☐ Tailored to UK audiences — programmes that are specifically made for UK audiences, and are relevant to me
- ☐ National cohesion — the broadcasting of events that bring the nation together for a shared viewing experience
- ☐ Diverse programming — content that features people like me, and people from different backgrounds
- ☐ Quality News — news content that is accurate, and helps me better understand what is going on in the world today
- ☐ None of the above
- ☐ Not sure

28) 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 broadcasting licenses
- ☐ Agree - I agree that the system may need to be reformed away from using broadcasting 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 broadcasting licenses
- ☐ Strongly Disagree - I feel strongly that the system should continue to use broadcast licenses
- ☐ Not sure

29) 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	☐	☐	☐	☐	☐	☐

30) 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.

- Rank: _____ A model focused on PSM institutions
Rank: _____ A model focused on PSM services
Rank: _____ A content centric approach
Rank: _____ 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?

CCIA has deliberately not ranked the models, and would ask that this is recorded as a considered position rather than a non-response.

Each model is described at a level of principle which leaves its definitions unstated. The services model depends on services meeting agreed requirements which are not stated. The content-centric approach depends on an agreed definition of public service content which is not stated, and which the Green Paper anticipates would evolve over time. A ranking between options whose central terms are still to be settled would give the Department a number without a basis for it. The reasoning below matters more, because it identifies what each model would mean for parties outside the public service media system.

The identity of the six public service media providers is established in statute and is not in question in this consultation. What the three models would alter is the mechanism through which obligations and benefits attach to public service media status, and whether that mechanism can extend to providers or services beyond the six. CCIA expresses no view on the first question, which is a matter for the providers themselves and for Ofcom. These comments address the second, and specifically the consequences each model would have for parties outside the public service media system.

A content-centric approach involves the least designation of organisations of the three. A model which asks what content is rather than who produced it does not create a standing class of providers holding an entitlement which others must deliver, and it is the model least likely to draw services into the public service media regime by virtue of the material they carry. It is also, in principle, the most capable of adapting as audiences and technology change, which is what the Green Paper's objective of systemic sustainability requires.

A content-centric approach depends on an agreed definition of public service content which is not yet available, and which the Green Paper anticipates would evolve in line with cultural and social needs. A definition designed to change over time requires a continuing determination of what qualifies, is the most demanding of the three to administer, and places the greatest weight on the Green Paper's commitment that criteria be decided in an open and transparent manner with regard to protecting media freedom. That commitment is the right one. Whether it can be met in practice depends on drafting yet to be seen.

The Green Paper observes that countries with more content-centric systems tend in practice to adopt a mixed model, with a small number of public service media institutions supported

by incentives for the wider supply of public service content. A hybrid or mixed model retains the accountability which comes from identifiable providers while allowing the system to recognise public service content produced outside them, and it does not require the whole of the framework to rest on a definition which has yet to be written.

A model focused on PSM institutions has one main advantage. From the perspective of a service which might be asked to carry obligations, it is predictable. The designated category is bounded and visible, which makes the extent of any duty knowable in advance. However, designation at institutional level creates a defined group holding a continuing entitlement; the Green Paper identifies a tension between that structure and its own objectives of flexibility and openness to a mix of providers. How that tension is resolved between providers is not a matter on which CCIA offers a view.

A model focused on PSM services warrants particular attention, because it is the model with the most direct consequences for parties outside the public service media system. It would extend designation to individual services, with the Green Paper giving a history or documentary channel on a video sharing platform as its example, and contemplating that obligations and benefits including prominence might attach at that level. Designation of that kind operates inside a platform rather than alongside it. It would draw private services into the public service media regime and its associated obligations by virtue of content hosted on them, and its effects would not be confined to the designated service, since anything elevated is elevated relative to everything else on the same surface. CCIA would encourage the Government to consider carefully whether that is an intended consequence of the model.

The same point runs through all four approaches. The choice of model would determine obligations falling on parties outside the public service media system, and the Green Paper describes those obligations only in outline. CCIA would welcome a further opportunity to comment once they are set out, so that they can be considered on their own merits rather than settled as a byproduct of decisions about how public service media providers are regulated. Endorsing principles such as universality or the provision of high-quality content does not imply support for prominence mandates as the means of delivering them.

None of this settles whether the problem has been established. PSM providers already reach very large audiences on the services these proposals would cover. The Green Paper does not say what level of reach would be enough, or how the Government would know it had got there. This matters because it decides whether the aim is to restore a position which existed only because there were a handful of channels and no room for more, or to make a narrower correction. CCIA would encourage the Department to set out where it expects to stop before deciding how to get there.

CCIA would add some additional points which bear on the prominence proposals across chapters 2.2 and 4.1, and which apply whichever model is taken forward.

There is only so much room at the top of a feed or a set of results. Elevating designated content necessarily reduces the visibility of other content, and the material displaced would include independent journalists, educational creators, charities, universities, community and

faith organisations and local voices, many of them British and many contributing to the same democratic and informational objectives that the designation is intended to advance.

The broad range of potential user responses is itself a reason for caution in any intervention. Those served designated content they did not seek may skip or block it, leaving that content seen less often than before the intervention rather than more. Others will be confused by the change in what they are shown, or will conclude that recommendations no longer reflect their own preferences, which erodes trust in the service and in the content surfaced through it.

Any statutory prominence within a recommendation system would mean the state deciding, through a designated list or an agreed definition, which sources of news and information the public is steered towards. The Green Paper's sixth principle rightly commits to criteria decided in an open and transparent manner with regard to protecting media freedom. CCIA would suggest that the difficulty lies less in the criteria than in the mechanism, and that a liberal democracy has good reason to be cautious about establishing one, however carefully the initial category is drawn. Any criteria will result in essentially arbitrary decisions at the margin between services 'just in' and 'just out'. While that is a common regulatory challenge, in this case it will mean similar services have a material advantage in competing for an audience, putting some media at an unfair commercial disadvantage.

31) 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?

The clearest impact of these proposals is that they would systematically advantage media companies over individual creators.

There is only so much room at the top of a feed or a set of results. Conferring preference on a designated set of providers necessarily reduces the visibility of other content, including that of independent journalists, community and faith organisations, minority-language and minority-interest creators, charities and local voices, many of which serve audiences with protected characteristics. A measure intended to improve access to trusted information may therefore reduce the reach of content on which particular communities rely.

CCIA is not aware of published UK data on the protected characteristics of individual creators as against those employed by established media organisations, but the Department should consider the potential for a disparity and that will determine the distributional impact. Any measure which favours designated media companies disadvantages individuals publishing independently, and the Green Paper itself suggests that group is more open to people who would not have reached an audience through traditional routes.