August 2026

Supplementary Input to Watch this Space: a new strategic direction for UK media

The Computer & Communications Industry Association is an international, not-for-profit trade association representing a cross-section of computing and communications firms, and 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.

This paper should be read as a supplementary input to CCIA's main questionnaire response to the current DCMS Green Paper consultation *Watch This Space*.

In summary

- Public service media content is discoverable on the services these proposals would cover. The case for intervention rests on a premise the evidence does not clearly support.
- Prominence within a recommendation system is a different kind of measure from placement within a device interface, not a stronger version of the same one.
- The Government's stated preference for voluntary agreement is working, and the prospect of legislation may slow rather than accelerate it.
- Whatever is elevated displaces something else. Much of what would be displaced would be British, independent and individual.
- The definitional questions the Green Paper defers are the ones that determine what any measure would cost and whom it would reach.
- Where a prominence measure is imposed, users should be able to switch it off.

The Green Paper's flawed premise

Public service media providers are not struggling to be found. The BBC's principal channels on YouTube carry well over thirty million subscribers, and its January 2026 partnership will add around fifty further channels, including seven for children, with programming made for the platform rather than repurposed from broadcast. The BBC similarly has over sixty million followers on Facebook. ITV reports UK views across its YouTube network up 51 per cent year on year in 2025.

Public service media does not occupy the position it held in an era before the Internet with most consumers only having access to a small number of terrestrial TV channels, and it will not again. That is a question about share of attention in a market with more competitors. It is not a question about whether audiences can find this content, and the Green Paper does not distinguish between the two. Which problem is being solved determines what a proportionate remedy looks like.

In effect these proposals ask platforms to subsidise a legacy distribution model. Public service media's share of attention has fallen not because audiences cannot find it, but because they now have far more choice. That is a change in audience behaviour which mandated prominence cannot reverse and should not attempt to.

The proposed instrument

Device-level prominence governs the placement of services within an interface. It is a demanding obligation in its own right for those subject to it. Prominence inside a recommendation system is an obligation of a different kind. It requires elevating designated material over the preference signals that make a service useful, and its effects extend beyond the designated provider, because anything elevated is elevated relative to everything else on the same surface.

The difference is one users would feel. Unlike a channel number on an electronic programme guide, prominence within a personalised feed interrupts an experience the user is already immersed in.

How users might respond is itself a reason for caution. Those 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. An intervention producing those responses works against the Government's objectives in the Green Paper.

This means that prominence of the form contemplated in the Green Paper is not a simple updating of prominence as it has applied in electronic programme guides, for example. It is also a narrow response to concerns about users discovering trusted information, benefiting a small number of media companies based on their historic role as broadcasters or a poorly defined (and necessarily arbitrary at the margin) "trusted" status.

Displacement effects

The Green Paper records at chapter 1.3 that lower barriers to entry are enabling niche voices, independent journalists and marginalised communities to reach audiences at a scale not previously possible. A ranking preference for designated media organisations operates directly against that. What is displaced is not principally other broadcasters. Depending on the final scope, PSB media or "trusted" media more generally, the losers might include other media companies (including respected newspapers). Independent journalists, educational creators, charities, universities, community and faith organisations, local voices and individuals, many of them British and many serving the democratic and informational purposes the proposals are intended to support are likely to lose out in either case. Evidence from other jurisdictions demonstrates that where policy ignores these realities and attempts to dictate the relationship between news publishers and digital platforms, the consequence can be that platforms' response is to be unable to continue to offer news at all, as seen with the Online News Act in Canada.

There is a further difficulty with the premise. The proposal assumes that established broadcasters are inherently more trustworthy than newer digital native outlets or individual journalists. The Green Paper does not identify the standard which makes designated content more trustworthy than everything ranked below it.

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 UK has regulated broadcast news through licensing for a century, but has never taken a view on the ordering of news outside that framework, and the distinction has been a meaningful one. The Green Paper's sixth principle rightly commits to criteria decided openly and transparently with regard to media freedom. The difficulty lies less in the criteria than in the mechanism, and a liberal democracy has good reason to be cautious about establishing one, however carefully the initial category is drawn.

What would be covered

The Green Paper asks whether all public service media content should be in scope. CCIA encourages a narrower approach. The democratic case made in chapter 2 is a case about news. The case for children's content is made separately and on different grounds, resting on access to high-quality, safe and educational material. Neither extends readily to entertainment, sport, soaps or feature films, where public service content competes with commercial content on ordinary commercial terms. Confining any measure to the categories where a public interest case has been established would make it considerably easier to design, implement and evaluate, and would limit the displacement of smaller and independent UK creators.

Chapter 4.2 proposes to reopen the one element of this which is currently settled, by extending designation to new providers or to individual services. CCIA offers no view on who should hold public service media status. It would observe only that a settlement resting on whether a provider was historically a terrestrial broadcaster is not a stable basis for privileging a company in ranking systems over the long term, and that the boundary becomes harder to defend as other providers, no less trustworthy, find themselves at a commercial disadvantage because of where a historical line was drawn.

Definition questions

The two prominence proposals sit differently. For trustworthy news, the provider category is undetermined. Section 56 of the Online Safety Act 2023 is offered as a starting point, but it was drafted to shield news publishers from safety duties, where breadth is the cautious choice. Prominence risks inverting the workability of that original proposal: too broad and the benefit is meaningless, too narrow and a regulator is picking winners in the news market.

For public service media, the providers are already settled in statute. What is unresolved is which services would carry obligations, what content would be covered, and what prominence would require in practice. To say that something must be prominent, you must say prominent where, and that means describing how a service is laid out. Any such description is drawn from the services that exist when the rule is written. 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.

News aggregators illustrate the difficulty. Chapter 2.2 is directed at social media platforms and, potentially, video sharing platforms. However, news aggregators, such as Apple News, 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 DCMS position as not intending to bring aggregators within scope, and would welcome confirmation of that in the Government's response to this consultation.

Where a prominence measure is imposed, users should be able to switch it off. The Government's first stated principle for this work is that it should be audience led, balancing prominence of news content against user empowerment. There is precedent within the existing framework: in implementing prominence on connected television platforms, Ofcom indicated that users remain able to reposition applications according to their own preferences, and the freedom of choice that preserves is a meaningful part of the settlement.

What CCIA would support

- Holding to the voluntary track, and being specific about what a satisfactory outcome looks like and by when, so that all parties can negotiate against a known standard.
- Establishing, on data drawn from the services concerned, whether prominence measures change what audiences watch before legislating on the assumption that they do.
- Assessing the combined compliance cost of this proposal alongside the regimes already in force, rather than against a baseline which assumes they are not.
- Providing users with the ability to switch off any prominence measure applied to them, consistent with the Government's own principle that the measure should be audience led.

Future of Television distribution

CCIA supports the direction of travel towards IP-based delivery, which offers real benefits in spectrum efficiency, innovation and consumer choice. Consumer behaviour has shifted decisively towards internet-delivered viewing, and maintaining legacy infrastructure beyond its useful life serves neither audiences nor the public interest. Delay carries its own cost, in that the UK risks losing ground to comparable markets which have moved earlier. 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, narrowing the digital divide and supporting growth in the wider digital economy.

That timeline should be matched by genuine readiness. Affordable broadband suitable for television viewing, low-cost devices, accessibility features and digital skills support all need to be in place before switch-off. Those are deliverable by 2034 with the right planning. The transition should not, however, become a vehicle for extending prominence obligations from device interfaces into online services. Those are separate questions and should be decided separately.

Future of television Regulation

CCIA's principal concern here is again scope. A framework defined by where audiences find TV-like content has no natural boundary, and a definition broad enough to capture long-form professional content on video sharing platforms will capture a great deal of user-generated material alongside it. The existing division is broadly coherent: mainstream on-demand services fall under the video-on-demand standards code, and services carrying user-generated content fall under the Online Safety Act, which regulates systems and processes for that reason. A new TV-like framework would cut across that division and complicate the regulation of services on both sides of it.

Potential problematic scenarios arising from these proposals

From "all PSM content" being in scope

1. A UK user searches for a recipe. The regime elevates a PSM cookery clip above a British food creator's video on the same dish, because the broadcaster holds designated status and the creator does not.
2. A user searching for football highlights is served PSM sport content ahead of the rights-holder's own channel, in a market where the two compete commercially for exactly that audience.
3. Soap opera clips receive statutory prominence. The democratic case in chapter 2 has become a preference for *EastEnders* over an independent British drama.

From the news definition being undetermined

4. A regional title just meets the trustworthy news criteria and its direct competitor in the same town just misses them. One is elevated in every feed in the area; the other is not. The difference is commercially decisive and nobody outside the process can see how the line was drawn.
5. A well-resourced outlet with poor standards qualifies on structural criteria, which do not test quality, and is elevated above a specialist publication with a better record on accuracy.
6. An investigative outlet exposes a government failing. Its designation is due for review the same year. Nothing improper occurs, but the perception problem is unavoidable.

From "other platforms" being open

7. A user asks an AI voice assistant a factual question. It reads out a designated provider's headline rather than answering.
8. A podcast app is required to place a PSM podcast above the shows a user actively subscribes to.
9. A parent opens a children's app to find a PSM news item elevated above the programme their child asked for.

From reciprocity and precedent

10. Three other countries adopt the UK model. A BBC drama is demoted in each of their markets to make room for their designated national broadcasters.

11. A UK creator with a large overseas audience loses reach in every jurisdiction that copies the proposed UK approach, and gains nothing at home because they are not a designated provider.

From the user-preference override

12. A user who has deliberately unfollowed a news brand continues to be served by it, because the regime operates above their stated preferences. The Government's first principle is that the measure should be audience-led.

13. Prominence measures activate during a period of unrest. The elevated coverage is slower than what users are already seeing, because designated providers verify before publishing. The measure works exactly as designed and audiences conclude the service is behind events.

CCIA would welcome the opportunity to discuss any of the above.