

Submission to the Education & Culture Committee of the Scottish Parliament

BBC Charter Inquiry

November 2015

1. The Scale and Scope of the BBC

The BBC helps connect the UK across all of its constituent nations and regions. It is that commitment to reflecting the diversity of the country that has brought some of the best content to the nation's screens. From *Gavin and Stacey* to *Mrs Brown's Boys*, from *Katie Morag* and *Stonemouth* to *Poldark*, *Shetland* and *Bannan*, audiences love the stories that the BBC tells about their lives across the UK. However, popular as such programmes may be, the BBC knows there is a growing need to see the full diversity of the UK's cultures and communities better reflected on screen and on air.

Earlier this year, Ofcom identified that there was an immediate issue with audiences about how public service broadcasting reflected and portrayed society in the UK. Across the nations and regions, the public wants the BBC to do more to portray the full diversity of life across the UK in its programmes and services. The UK is changing and it is not necessarily an easy undertaking to represent or portray every aspect of life across all services. However, as a public sector broadcaster, the BBC has a major role to play here and in the next Charter its programmes and services will evolve to meet these changing audience demands.

During the current Charter, steps were taken to ensure that spend on BBC network television in each nation would broadly match that nation's share of the population. But the BBC recognises that spend is not everything— more has to be done to reflect the lives and experiences of all licence fee payers.

During the next Charter period the BBC will remain committed to investing in programming across the UK and will ensure that the drama and comedy produced for BBC One and BBC Two better reflects the diversity of the UK's nations and regions.

As the pace of devolution quickens—and as the UK changes more quickly than in recent history—the BBC will need to adapt its services to ensure they fully reflect and report the asymmetrical development of devolution across the country. The BBC should neither lead nor lag behind constitutional changes in the UK but, rather, its priority must be to ensure it provides viewers and listeners with the information they need to make sense of their world, in turn to help them to hold to account those in power.

We know that in an increasingly devolved UK, news which is relevant to audiences in one part of the country does not necessarily have the same resonance or applicability in others. As the politics and economics of the constituent elements of UK become more varied, the business of reporting becomes more complicated. Against such a backdrop, the BBC has a responsibility to ensure it is informing the audience in the most effective and relevant ways.

The BBC believes the time has come for it to strike a better balance between the delivery of pan-UK news and news tailored to the distinctive needs and agenda of the devolved nations of the UK and, in Scotland, this will be a priority area for work in the coming weeks and months.

Should in-house production quotas and Terms of Trade allow greater competition and what impact could this have on the Scottish broadcasting industry?

At the point of the submission of this written evidence, the BBC Trust has recently closed its consultation on the BBC proposals for the future of the relationship between the BBC and independent production companies, known as the "BBC Studios" proposals. The BBC Executive awaits the outcomes of the consultation process.

As the proposal currently stands, BBC Studios would become a wholly-owned subsidiary of the BBC Group and operate in the market. It would produce programmes for the BBC and other broadcasters in the UK and internationally and return all profits to the BBC Group.

It would be committed to supporting the BBC's public service mission and values and would keep programme-making at the heart of the BBC, producing much loved titles such as *Doctor Who, Strictly Come Dancing, EastEnders* and *Big Blue Live*.

As part of these plans, the BBC is also proposing to remove its overall in-house guarantee of 50 per cent, meaning that external producers, including those based in Scotland, would be able to compete for a much greater proportion of BBC network commissioning spend. Indeed, it proposes to open around 80% of its overall TV network slate to competition from external suppliers in a typical year by removal of the guarantee across specific genres. This will grow the level of competition in the market.

The BBC believes this proposal is the best way to keep delivering fantastic creative programmes for audiences and long-term value for licence fee payers.

For television, BBC Studios will comprise all the network production departments that are currently part of BBC Television: Drama (including the BBC's continuing drama series such as *EastEnders*), Comedy, Entertainment, Events (including the teams producing coverage of ceremonial events as well as festivals such as Glastonbury and BBC live events), and Factual (including the Natural History Unit, Features & Daytime, Specialist Factual, Documentaries and Popular Factual). The Music Television department, currently part of BBC Radio, will also move into BBC Studios. So in Scotland, our Special Factual centre of excellence is part of the proposals, whereas our BBC Children's team is not (as detailed below).

For radio, the BBC's in-house Radio Comedy department will also become part of BBC Studios. This team is already fully integrated with the Television Comedy department, since there are benefits to be gained from sharing ideas and talent between the two and the BBC believes that keeping these departments together is the best way to continue to deliver a strong comedy offering to BBC audiences across both platforms. The rest of the BBC's Radio division will remain within the Public Service.

For digital, the core business of BBC Studios will be creating long-form television programming. However, there is a growing demand from audiences for new forms of content for digital platforms and BBC Studios will need to be equipped to serve the BBC's needs in this area, as well as exploring opportunities with other commissioners.

Different genres are moving at different paces on the journey towards digital: BBC Studios is likely to focus on areas where the internet is enabling new formats and new ways of reaching audiences, and where new creative skills and story-telling methods are needed to preserve the BBC's traditional strength. Within the BBC's Charter proposition, we have set out proposals for a new digital service for each of the nations, including Scotland.

News programming will continue to be delivered solely by in-house teams and the BBC has announced its intention to retain Current Affairs production in the Public Service as part of BBC News. This is to ensure that the BBC has the ability to deliver the sort of sensitive, risky investigations that require clear editorial oversight from the Director of News and, in some cases, the Director-General. The BBC will retain an in-house guarantee for Current Affairs, and will continue to work with

independent producers in this genre, such as Mentorn Scotland, who currently produce *Question Time* in Glasgow.

The BBC has also announced that Children's and Sport production will remain in the Public Service at this stage. For Sport, this is to ensure that the BBC can continue to deliver its multiplatform service to audiences—involving close working between Television, Radio, Online and News teams—and that it can guarantee the critical mass of production skills needed to deliver major global sporting events such as the Commonwealth Games and the Olympics.

For Children's, this is to preserve the BBC's offer to this critical audience. BBC Children's is likely to undergo transformation in the next few years as it responds to changing media behaviours amongst young people and we need to ensure that the department can focus on delivering the best possible service to audiences, working closely with interactive and technical teams across BBC Digital. Our proposals for the next charter include an 'i-Play' service, a new online platform for the BBC's children's content, designed around the needs of children, their parents and carers. BBC Scotland currently makes a range of network children's content. As with Current Affairs, the BBC will retain an in-house guarantee as well as upholding its commitment to commissioning content from external providers in both these genres.

The BBC's television production activity today is spread across seven main bases: London, Glasgow, Bristol, Birmingham, Salford, Cardiff and Belfast. This is a reflection of the BBC's ambitions to create programmes that fully reflect different cultures and communities and its strategy of developing sustainable production ecologies around the UK, supported by targets of spending 50% of network budgets outside London, including 17% in the three devolved Nations.

The BBC will remain committed to spending on programming outside London and a presence across the UK will likewise be central to BBC Studios' public service mission. It will make it a distinctive entity in the UK market and will enable it to draw on an unrivalled breadth of creativity, experience and expertise across the country. It will also ensure that it can continue to serve the BBC's commissioning needs, as well as exploring opportunities with other commissioners.

In the longer term, it will be for the Director of BBC Studios and the BBC Group as a whole to shape BBC Studios' presence around the UK, but BBC Studios is likely to build on existing in-house production centres of excellence wherever it can - for example, Glasgow with its expertise in Specialist Factual programming.

<u>Is the BBC's online presence damaging local and regional news outlets in Scotland? What could be</u> done to ensure the BBC works more co-operatively with the local and regional news sector?

We believe that our online news offer is what audiences want and expect – the very fact that the number of unique users of BBC Scotland online continues to increase year on year (currently averages 4.7m per week, up from just over 4m last year) is clear evidence of this.

The well-documented challenges facing the news sector stem largely from the structural shift of advertising online and news providers worldwide are today competing for revenues against a much broader set of competitors. As noted in the BBC's response to the DCMS consultation on Charter, overall online Net Advertising Revenue (NAR) in the UK went up from £1.2bn to £2.1bn over the period 2009–2013 compared with a decline in national and regional newspaper NAR from £2.8 billion to £2.1 billion over the same period.

The BBC is not responsible for these structural changes in the market. The decline in newspaper sales and in advertising can be observed in all major markets, irrespective of the existence or scale of a Public Service Broadcaster. In the US, PSB is small (c1% TV share), but newspaper revenues still fell by around one-third and newsroom employment shrank by nearly one-fifth during the period 2000–2009.

Where, in the past, there have been questions about the BBC's presence online, the BBC Trust has rightly scrutinised and, where appropriate, taken action, such as with BBC Jam and with the Local Video proposition put forward by BBC News some years ago. Our overall approach has been to be very careful not to encroach on local markets but rather to look, where we can, to providing links on our pages to local press. We do engage regularly with the Scottish Newspaper Society to discuss all such matters and concerns with them, including the most recent BBC Charter proposals with regard to local journalism.

Indeed, the BBC welcomes the intention behind the suggestion in the UK Government's Charter consultation paper that 'the BBC could have more specific responsibilities for partnership working'. A BBC that is truly open to partnership is a major theme of the BBC's own Strategy Paper. We want to become a platform and a catalyst for this country's incredible talent. In common with the BBC as a whole, we intend to put our technology and digital capabilities at the service of our partners and the wider industry to deliver the best to licence fee payers. To achieve this, we recognise we have to become a better partner working in a more genuinely collaborative way with like-minded institutions, with suppliers, individuals and competitors.

2. Serving the interests of the Scottish audience

<u>How well is the BBC serving the Scottish audience (English and Gaelic speaking) and representing Scottish issues to the wider UK audience?</u>

In Scotland, 95% of adults consume BBC content each week. Consumption of pan-UK BBC output accounts for 88% of all BBC consumption in Scotland (the remaining 12% of consumption is of Scotland-specific output). There is a clear appetite and appreciation for what the BBC has to offer to audiences in Scotland and there is a growing demand for programming, from the BBC, that serves the distinctive needs of Scotland and reflects Scotlish life.

Current Provision

The past year provides a useful snapshot of the contribution the BBC makes to modern Scotland and beyond, not least in terms of the range, quality and impact of programmes and content from BBC Scotland.

In 2014/15, the number of originated TV hours broadcast by BBC Scotland rose to a record level, with year-on-year increases: local TV hours went up from 818hrs in 13/14 to 882hrs in 14/15; network TV hours went up to 917hrs against 915hrs the previous year; and BBC ALBA hours went up from 649hrs to 702hrs in 14/15. Over the past 10 years, BBC network TV hours have increased almost threefold (from 323hrs in 04/05). This represents a current investment of c £70m - £80m in the Scottish creative economy.

Scotland radio originated hours were also up year on year, with Radio Scotland's increasing from 8070hrs in 13/14 to 8298hrs in 14/15. The latest RAJAR figures, covering April to September 2015, show that BBC Radio Scotland has gained almost 80,000 listeners since the same period last year and

had its best summer performance since 2011. The station now has a weekly reach of 948,000 - more than a fifth of adults in Scotland. Radio nan Gaidheal's originated hours moved from 3594hrs in 13/14 to last year's 3634hrs. It was voted Station of the Year at the 2015 Celtic Media Awards.

BBC News Scotland Online recorded its strongest ever performance during the week of the Referendum vote in 2014, attracting 22.6m global browsers (13.2m in the UK) and the average number of weekly browsers is now up to 4.7m.

Programme and service headlines: 2015

• Reporting Scotland remains the most watched television news programme in Scotland. There was comprehensive coverage of the 2015 General Election, with, for the first time, live broadcasts from 59 declarations at all 32 counts. As the election results started to come in on the night (7 May) viewers tuned in to BBC One Scotland, which attracted an audience share of 31.5% between 2155 and 0200, well ahead of the viewing figures for any other channel in this slot. The Investigations Team broke new ground in its investigations into serious allegations of doping in athletics (Catch Me If You Can), The War Over Fracking, the cruel trade in dog trafficking (The Dog Factory) and, most recently, the inquiry into the Glasgow Bin Lorry tragedy (Lies, Laws and the Bin Lorry Tragedy). The BBC's flagship current affairs programme, Question Time, is produced from Scotland.

A range of sports continued to be covered, including Pro-12 Rugby, the Melrose 7s, shinty, bowls, Championship and Scottish Cup games, etc.; the Celtic v Rangers League Cup game in February 2015 attracted an audience of 890,000 and a 60% audience share.

- Recent changes to the Radio Scotland schedules were put into effect in order better to serve audiences in Scotland, particularly given the significant rise in interest in current affairs and politics that took place during the Referendum campaign. To this end, Saturday and Sunday editions of *Good Morning Scotland* were introduced and the weekday morning phone-in programme, presented by Kaye Adams, was extended from 0900 to 1200. *Newsdrive* was also extended to 6.30PM each evening. Recent Rajar figures (as noted above) indicate that the changes have proved popular with audiences.
- Recent drama successes include *Stonemouth*, the two-part adaptation of lain Banks' penultimate novel and *One of Us*, the four-part thriller written by the creators of *The Missing*, is currently in production. A third, six-part series of the Ann Cleeves' crime drama, *Shetland*, is due for transmission in January 2016 the last series drew an average audience of almost 6 million viewers UK-wide and performed particularly well in Scotland where it had an average audience of 700,000 and a share of 30%. There was significant also financial investment from BBC Scotland into the recent adaption of the Lewis Grassic Gibbon classic, *Sunset Song*, and *River City* continues to be a firm favourite with audiences.
- The first serialised Gaelic drama originated for BBC ALBA Bannan was warmly welcomed by the audience and 18 episodes have so far been commissioned. Across the year, the service's reach among the Gaelic community went up from 72.4% to 72.6%, though it dropped slightly among the general viewing audience.
- BBC Scotland has contributed significantly to the BBC's WW1 anniversary programming, with
 documentaries such as *Pipers of the Trenches, The Highlanders' War, Quintinshill Britain's*Deadliest Train Disaster and Scotland's War At Sea all telling the tales of those who paid the
 ultimate price in serving their country.

- A significant number of BBC One Saturday night lottery shows, on network, have been shot at Pacific Quay in Glasgow, including *In It To Win It, Five Star Family Reunion, Who Dares Wins,* Pressure Pad, Win Your Wish List, etc., and there additional entertainment commissions currently in the pipeline. Eggheads continues to be a firm viewers' favourite.
- The TV Comedy offer from BBC Scotland this year has included *Badults* (on BBC Three), a second series of *Bob Servant*, with Brian Cox (on BBC Four and BBC One Scotland), *The Sunny*, *Sketchland*, *Scot Squad*, *Mountain Goats* (BBC One network) and last year's BBC Scotland Hogmanay success, *Two Doors Down*, was also commissioned for a six-part series by network and is currently in post-production. In January, our co-production with RTE, *Mrs Brown's Boys*, picked up the National Television Award for Comedy for the third year in succession.
- It was another particularly strong year for the in-house Factual team, across Science and Arts, with hugely popular series such as Earth's Natural Wonders, Trust Me I'm A Doctor, the BBC Four Goes Pop season (including What Do Artists Do All Day, A Day in the Life of Andy Warhol, Soups Cans and Superstars, etc), Imagine, Secret Knowledge, The Secret Life of Books, etc. The three part Horizon Special; What's The Right Diet For You?, stripped across three consecutive evenings on BBC Two in January, attracted an average UK audience of 2.3m. An online diet test attracted more than one million users during the three days of transmission and the e-book which accompanied the series is the most downloaded BBC book ever.

Recent Scotland output has, among a range of titles, included the much acclaimed four-part Story of Scottish Art, Grand Tours of the Scottish Islands, The Secret Life of Midges, the two-part Transplant Tales (with unprecedented access to the Scottish Transplant Service), the three-part Planet Oil, Scotland's Home Movies, Andrew Carnegie: Rags to Riches, Dead Man Cycling (on Scottish Paralympian David Smith), Transsexual Stories, the second six-part series of The Mountain, the three-part How Scotland Works, the two-part Scotland's Superhospital and continuing series such as Landward and Beechgrove Garden.

• There were BAFTA and BAFTA Scotland awards for CBeebies' favourite, *Katie Morag*, including one for Cherry Campbell, who, at nine years of age, became the youngest BAFTA winner ever. *Nina and the Neurons, My Pet and Me, A Long Long Crime Ago, My Dog Ate My Homework*, and *All Over the Place* were only some of the other Children's commissions from Scotland for network.

One of BBC Scotland's objectives is to make distinctive, world-class content that reflects Scotland, its people and its culture to themselves and to the rest of the UK and beyond. In order to achieve such an objective, consideration must be given to issues such as portrayal and representation and these are important constituent elements within dramas such *Shetland, Stonemouth* and the Scottish classic *Sunset Song*; within Factual output such as that noted above and forthcoming productions such as the four-part *Highlands* for network (a two year project that will focus on Scotland's wildlife), the 12-part *On the Farm* series, the six-part *The Mart* (filmed at Inverurie's Thainstone Market, one of Europe's busiest livestock markets); in Children's output such as *Katie Morag*, filmed on Lewis; in supporting the work that the BBC Scottish Symphony Orchestra does in its broadcast input to BBC Radio 3, its regular tours of Scotland and beyond (most recently India and China) and in its contribution to major festivals such as The Proms and the Edinburgh International Festival; and so on.

Continuing on this theme and in addition to those 2016 TV programmes noted above, Scotland and its people will be reflected through new BBC Scotland programmes and series due for transmission over the coming weeks and months, including:

- Coming Oot! A Fabulous History of Gay Scotland
- The Man Who Changed the World, a documentary on renowned Scottish physicist James
 Clerk Maxwell
- A documentary which looks at 50 Years of the Mountain Bothy Association
- The Clyde Puffers a documentary with David Hayman, to be screened alongside an 1967 archive episode of The Vital Spark
- A documentary profiling Scottish comedian and actor Gregor Fisher
- Wounded Nation, a three part documentary which charts the impact of the WW1 on communities across Scotland
- On Radio Scotland, forthcoming programming including a three-part biography of Billy Connolly, a History of the Barrowland Ballroom in Glasgow and a drama based on the early career of internationally acclaimed singer, Lulu
- And across television, radio and online, in Scotland and on network, there will be extensive coverage of the 2016 Celtic Connections Festival, which takes place between 13 and 31 January.

Skills and Talent Development

Allied to our programme production activities, there is also an important role for the organisation to play in terms of its not insignificant economic impact on the Scottish and UK creative economies and in the contribution it must continue to make to training and skills development across the broadcasting industry.

Such aspirations and achievements must, of course, be set against the challenging economic circumstances in which the BBC has had to operate, since the freezing of the level of Licence Fee funding in 2010 and the challenges set by the recent Licence Fee agreement. Against this backdrop, we have made every effort to ensure that the impact on our on-air offer to audiences has been kept to a minimum, with the bulk of efficiency savings made elsewhere in the business.

BBC Scotland plays a key role in building skills and delivering training across the media sector and works in partnership with external organisations such as Skillset and Skills Development Scotland to provide development and open up opportunities across the industry.

From April 2013 to July 2015, the BBC Academy delivered training to around 2,800 delegates from Scotland, across 150 different courses, covering all aspects of production and craft skills, journalism, and leadership skills.

BBC Scotland also supports the entry of diverse new talent into the industry through a range of traineeships, apprenticeships and work experience opportunities.

From July 2014 to June 2015 BBC Scotland hosted 358 work experience placements across the whole organisation, with nearly 10% of these being taken by individuals from minority ethnic groups or people with a disability.

In 2014, BBC Scotland established an 18 month Operation Skills Training Programme, enabling eight trainees to work across a range of camera and sound craft areas.

BBC Scotland's Apprenticeship Scheme is now in its fifth year. Launched in 2011 with Glasgow Kelvin College, Skillset Scotland and Skills Development Scotland, 10 apprentices are trained each year in production skills for the industry. By August 2015 we brought 40 apprentices through the programme, the vast majority of whom have gone on to work in the industry. Of the current cohort of 10, which started in September, 10% are from a BAME background, 50% have a disability and 30% are also from a C2DE background.

We provide training for the wider industry with events like Fast Train for freelancers, held in October 2013, with 65 interactive sessions and 6 masterclasses reaching 180 delegates; and our media and on-air TV and Radio training sessions for contributors, such as Expert Women and, most recently BAME Experts, held March 2015 for 18 delegates from Science, Medicine, the Law and the Arts.

BBC Scotland also continues, annually, to offer financial support to the Glasgow Caledonian University TV Fiction Writing Scholarships Course, helping to develop new writing talent for the industry.

We are currently working, on a pan-Scotland basis, with the Scottish Graduate School for the Arts and Humanities to offer flexible placements for post-graduate students in BBC Scotland departments and potentially within Scotland's independent production community.

To help develop young musical talent, the BBC Scottish Symphony Orchestra works closely with students at the Royal Conservatoire of Scotland, offering mentoring, work shadowing and placements and, most recently, has been involved in the BBC's Ten Pieces project, to stimulate interest in music among primary and secondary school pupils.

3. Governance arrangements

How could BBC governance be improved to enhance the Scottish voice?

BBC Scotland welcomes the scrutiny being applied to the BBC model of governance and regulation. As noted in the BBC response to the DCMS consultation on Charter, that model, whatever form it should take within the context of a new Charter for the BBC, should be clear, flexible, proportionate, easy to understand and it should enable fast decision-making in response to a fast-moving environment.

It should also protect the BBC's independence; uphold the interests of licence fee payers; enable the BBC to remain distinctive and relevant in a fast-moving world; take market impact considerations properly into account; ensure the BBC operates in the public interest, with effective routes for redress when it does not; and ensure a clear separation between corporate governance and regulation.

The Chair of the BBC Trust and the Director General (in his speech to Cardiff Business Club on 23 November, 2015) have both indicated that the current model of governance and regulation requires revision. The DG, in particular, has pointed to the prospect of full external regulation for the broadcaster, a corollary of the BBC's support for a single unitary board, comprising a majority of non-executive directors, the Director General and a small number of BBC executives, under a non-executive chairman. The unitary board would be fully independent of Government.

Accountability to licence payers must lie at the heart of any such reforms. Scotland has been represented on the BBC's governing board, from the advent of the Broadcasting Council for Scotland

(BCS), which first met in January 1953, through to the present day. Until 2007, the chair of the BCS also served as BBC National Governor for Scotland; since then, the National Trustee for Scotland has acted both as Chair of the Audience Council for Scotland and as the national representative on the BBC Trust. On the Executive side, the Director of BBC Scotland is a member of the BBC's Executive Team. Whatever models of governance and regulation are deemed appropriate within the context of the new Charter (and the independent review chaired by Sir David Clementi will have an important part to play in this respect), they will need to operate in such a way as to ensure there is no diminution in the level or quality of representation of Scotland's interests at the highest levels within the BBC. Likewise, if the BBC is to be regulated by an external body, that body should be resourced appropriately to ensure it is able to consider and deal with regulatory issues that pertain to Scotland.

Accountability to licence payers also underpins the Director General's stated desire to introduce single service licences for each nation (Scotland currently has three separate service licences – for Radio Scotland, Radio nan Gaidheal and BBC ALBA; TV and online output is covered by pan-UK licences for BBC One, BBC Two and online) and to propose greater flexibility in local decision-making on how budgets are spent in each of the nations.

The BBC response to the DCMS consultation also proposes that, in order to strengthen links between the BBC and licence payers, a legal obligation should be introduced for the UK Government to consult licence fee payers and the BBC's regulatory body on future decisions about the funding and scope of the BBC. It would be appropriate for a Scottish dimension be built in to such a proposition.

The MOU recently agreed between BBC, the UK and Scottish Governments and the Scottish Parliament ensures that, for the first time, the Scottish Government and Parliament will have a formal role in reviewing the BBC Charter. Additionally, it also ensures that the BBC's Annual Report and Accounts will, each year, be laid before the Parliament. Such scrutiny of the BBC, in Scotland, is wholly appropriate.

4. Cost savings

What would be the impact of any further cuts to BBC spending in Scotland?

BBC Scotland is proud of its track record of realising business improvement opportunities, innovation and generating efficiency savings. We believe that this has enabled us to minimise reductions to programming and content which the Scottish audience value highly. In a 2015 BBC Efficiency Review report published by PWC, it was found that the BBC, as a whole, compared favourably with other organisations in delivering savings across overheads and back office services.

The overwhelming majority of these efficiency savings have been achieved through productivity, leaving the volume of content produced for the Scottish audience largely unaffected. The impact of the recent Licence Fee deal (resulting in an estimated annual savings target of c3.5% per year over a five year period) will necessitate some challenging decisions for the BBC and its divisions (including Scotland, although there is a commitment to protect the Nations by ensuring that their funding is subject to smaller savings targets than other areas) but the full detail of how future efficiency targets will be set has not yet been concluded. Although the level of future efficiency savings for Scotland will not be finalised until next year, it is reasonable to suggest (given the conclusions within the PWC report) that it will not be possible to generate these savings without affecting the level of programming and content to some extent.

ENDS