

Submission to Commission on Future of Media (in Ireland) from Dr Rosemary Day.

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This submission is structured in two parts as follows:

Part One: A general introduction suggesting four areas or tracks that the Commission should consider.

Part two: A response to the questions posed in the template.

Part One: Introduction

No one can say for certain how the media will develop over the next few decades but we can be sure that communications will change dramatically and rapidly. The media landscape changes in response to technological innovations but the primary force for change comes from the private sector as business interests move to capitalise on new developments to maximise profits. As a result, we need to protect a space for content that is in the national interest and that enhances the lives of Irish people as citizens and as individuals.

We live in an open, liberal economy, in an increasingly interconnected world, so the numbers and types of content providers will continue to multiply. History shows that the 'free market' does not provide unprofitable material. The most 'successful' broadcasters in these types of markets are the best resourced and most aggressive, building national and international chains to provide formulaic, 'popular' programming. These do nothing to preserve democracy; to protect diversity; to promote tolerance and to celebrate difference much less to provide a voice for the marginalised or to challenge patriarchal capitalism with all the injustices that this twin ideology carries with it. If the provision of programming and other content is left to a totally free market, the core values, culture and identity of the Irish nation will be at risk. It is therefore crucial that strong, independent, trustworthy voices that celebrate, develop and question all areas of Irish life, culture and values are resourced and protected by the nation for the benefit of the nation.

This commission has the challenge of imagining how such voices can be established and supported and in outlining what their role may be. I believe that this commission should use "green field" thinking and outline what the principles of the provision of public service content should be. I believe that it is crucial for this commission to identify the key requirements of the people of Ireland, as individuals, as citizens and as a nation first. Once these are outlined and agreed upon, questions regarding the reform or restructuring of RTE will be more easily and usefully answered. These principles can guide the direction of public funds towards the provision of public service content and programming appropriately in the future where the only certainty will be that there will be challenges and changes. RTE recognised this back in 2017 when it published its strategy to work with content across multiple platforms and began to move away from the approach that treated radio, television, print media and on-line provision as separate structures.

So, general principles need to be established first and then proposals for a set of mechanisms to deliver on these principles can be devised. These will need to be flexible so that they can be adapted quickly and easily in response to and in anticipation of technological changes and to business capitalisation on those changes. It won't be possible or advisable to depend on any single approach.

There is a danger in trusting that legislation and regulation will protect democratic processes, objectivity in news provision and prevent the spread of ideologies that run counter to the core values of the state and that threaten its citizens. I believe that it is highly unlikely that regulation will be a major force in preventing such threats to democracy and to Irish identity and self-confidence in the future. Content is moving to platforms that do not

require licenses; content that people can access free of charge and content that probably originates outside of this state. Certainly, the Irish government needs to continue to collaborate with other governments for an international, collective response to such threats and to encourage self-regulation. Any attempt to protect citizens is welcome but we cannot trust to regulation to protect our citizens in the future.

Instead, we need a series of incentives and direct interventions to ensure that Irish and Irish public service content is produced for and accessed by Irish people.

I believe that legislation needs to promote a four track approach to:

1. Ensure the operation of a strong, public service content provider
2. Ensure the provision of public service content across all sectors and platforms
3. Ensure the provision of clear identification of and easy access to this public service content and to Irish content from all sectors
4. Ensure the provision of on-going media literacy education.

1. A strong public service provider.

There is a pressing need, in this new world of multi-platforms and channels, for the state to pay for a single public service communications provider. With so much choice and with so many commercial voices clamouring for attention and for power, it is essential that Irish identity, in its multiple forms and Irish democracy be protected and catered for and that people can access expressions of this identity easily and free of charge.

A multiplicity of broadcasters rarely delivers diversity without regulation. A scramble for audiences leads to either multiple copies of the same formats and ideological messages or to a fragmentation of the audience - niche broadcasting/narrow casting.

Unfortunately, only state funding (at one remove) will provide a clear channel that people can depend upon for news and for diverse opinions. We have this in RTE today, despite all its faults. Successive Reuters research in collaboration with DCU's FuJo has shown that Irish people trust RTE and trust their news. This should be protected and built upon, we cannot depend on the 'free market' to provide this.

Countries that do not pay for independent and 'unbiased' news and current affairs can find their populations more easily polarised or swung towards extremism. If we are to protect quality and some measure of objectivity in news and current affairs we need to pay for this. The market will not support it and recent consolidations of radio stations and changes in television ownership have resulted in the reduction of newsroom staff and of the minutes devoted to news and current affairs.

Independent journalism costs money but it does not make enough money to pay for quality so, profit seeking companies will not provide it by choice. In the past, regulation and the provision of licences forced commercial broadcasters to provide news. However, it is clear that new platforms cannot be easily regulated so, I believe that the only alternative is to

incentivise content providers to produce this type of costly, quality programming. If we want a fourth estate then we need to pay for it.

Such funding needs to come from the people and therefore needs to be channelled through state apparatuses. On the other hand, the state must remain at one remove from content provision in terms of ownership and supervision. The existing model of the RTE Authority and of the regulator, currently the BAI, is a good one as it ensures that politicians have less opportunity to control or to sway editorial. However, I believe that the hybrid model of financing RTE, where RTE has to deliver high audience numbers to attract advertising, should be abolished. It takes up too much of the energy that should be devoted to the public service broadcaster's primary remit and it risks the danger of big business having an influence on the broadcaster.

We need to ensure that all Irish people see themselves and their lives and aspirations, their hopes, attitudes and values reflected in the media. We also need to protect and develop the multiple identities of Irishness – this includes the Irish language, sports, music and arts and these should take centre stage and considerable funding. These are after all what makes us unique. This was recognised at the dawn of Irish broadcasting in 1926 when Ireland's future first president, Douglas Hyde, expressed the hope that the new radio station would mark

the beginning of anew era in which our nation will take its place amongst the other nations of the world. A nation which has never been made by Act of Parliament. **A nation is made from the inside, it is made, first of all by its language, if it has one; by its music, songs, games and customs.** So, while not forgetting what is best in what other countries have to offer us, we desire to especially emphasise what we have derived from our Gaelic ancestors(Emphasis in bold is my own)

The importance of embracing what is good that comes from outside is clearly recognised here, as is a pride in Ireland taking her rightful place in the world but the importance of protecting, preserving, developing and celebrating the cultural elements that make Ireland Irish is flagged as the priority. I believe that this holds true today and should be central to any policy or legislation for public service content provision.

To put it simply, any Irish person can access international content easily. We do not need to ensure that Irish taxes or fees of any nature pay for content produced elsewhere for example American films, international soccer, British comedy or pop music. These are all available on line for Irish audiences to engage with anyway. Irish content, in particular Irish public service content, is not available to Irish audiences without public funding. To spell it out, if we don't pay for it, we won't have it. Ensuring that Irish public service content is available to Irish people and that it can be easily located and accessed – these are responsibilities that we owe to future generations of Irish people.

The 2001 Act explains clearly what a public service provider should be and it is useful to reflect on these as this Commission attempts to map out a future for the provision of public service content in Ireland. It states that

“the character of a public service,..... to be a **free-to-air service** and be made available, in so far as it is reasonably practicable, to the whole community on the island of Ireland

..... the programme schedule of the broadcasting service shall

- a) provide a **comprehensive range of programmes** in the **Irish and English languages** that **reflect the cultural diversity** of the whole island of Ireland and include, both on television and programmes that **entertain, inform and educate**, provide coverage of **sporting and cultural activities** and **cater for the expectations of the community generally as well as members of the community with special or minority interests** and which, in every case, **respect human dignity**,
- b) provide programmes of **news and current affairs in the Irish and English languages**, including programmes that provide coverage of proceedings in the Houses of the Oireachtas and the European Parliament, and
- c) facilitate or assist **contemporary cultural expression**.

(Broadcasting Act, 2001. I have highlighted the key points for ease of reading in bold, there is no such emphasis in the Act)

So, the recognition of the importance of our unique heritage is recognised. Foregrounding, protecting, preserving but also recording, promoting and motivating engagement with and ownership of the things that make us Irish are the top priority. The crucial role played by independent, quality journalism in protecting democracy, fairness and truth comes next. The third point recognises the need to foster and develop contemporary cultural expression which is really important for any nation that chooses to neither stagnate in the past nor lose itself in the cultural hegemony of others.

1.a. Finance

The current hybrid model of funding for our public service broadcaster needs to be changed. The dependence on advertising only wastes time and effort that would be better spent providing good quality programming. Advertising is increasingly divided by the multitude of platforms and will be harder to source going forward. Desperate attempts to reach mass audiences in the hopes of increasing advertising have often led to poor quality, generic programmes, frequently bought in from elsewhere. A new public service provider needs to be freed from this handicap and be resourced sufficiently so that it can concentrate on its core responsibilities and remit. It should not broadcast cheap programming with no public service content in the future however it needs to be properly resourced to be able to do this.

Irish people do not have a tradition of paying for content, they want free access to programming and they resent ‘stealth’ taxes in particular television licence fees. The whole notion of a broadcast licence or fee is toxic for politicians who never want to increase it and thereby lose votes. This has not served RTE and therefore its audiences well in the past.

The licence scheme is often defended as a way to avoid excessive or even direct control by the Department of Finance and Government as the use of central funds from general taxation could lead to interference – editorial and otherwise. This principle of ‘one remove’ is a good one and any new funding scheme needs to ensure the independence and

autonomy of the principal, public service content provider. However, it should be possible, with careful legislation, to devise a method of ringfencing a proportion of revenues raised by normal taxation for the public good i.e. public service content provision. A funding mechanism that would ensure the editorial and managerial autonomy of the provider of public service content could surely be established.

So, I believe that it is crucial to pay for a strong, single public service provider of content along the lines of public service broadcasters in Ireland and elsewhere. This is to ensure that there is a trustworthy source of relatively objective news, critical debate and current affairs coverage to protect democracy and to educate and inform citizens. This provider needs to concentrate on the elements of our culture and society that are uniquely Irish. This includes the Irish language, traditional music, Gaelic sports and heritage materials and it must also embrace the realities and experiences of modern or contemporary Irish life, art, culture and leisure.

This is a huge responsibility and it requires serious public investment on an ongoing basis to ensure not only content production and provision but also to ensure that that Irish people can find this material easily among the clamour of other voices and that they can access it for free on whatever devices people will use in the future.

2. Provision of public service content across all sectors and platforms

Reliance on one institution to be the sole provider of public service content in Ireland would be foolish. There are many content providers competing for Irish eyes and ears at present and these will only multiply as time goes on. As outlined above, I believe we need a strong, well resourced public service provider that can stick to its remit but I also believe that we need to provide for public service content across all platforms accessed by Irish people. This may be difficult, for example where this content is coming from outside the jurisdiction but a creative and well funded set of government initiatives could really assist Irish producers of content to ensure that public service programming/content is provided at different points in their schedules/offerings. That way, people who browse, as we used to channel hop in former times, will still be exposed to the richness of Irish culture, will see themselves and their experiences reflected in the media they consume and the platforms that they engage with and they will have access to trustworthy, relatively objective, quality journalism.

I believe that we need to protect and promote Irish culture and our heritage – the Irish language, Irish sports, Irish music and the arts. I believe that we need to reflect cultural diversity, provide minorities with a voice and protect the vulnerable. I believe that democracy is a fragile system that needs the protection of autonomous, well resourced journalism. I further believe that Irish people want to learn, to grow and to prosper as an autonomous, confident people, comfortable in our own identity(ies).

So, it follows that we need to enshrine these principles in law, in regulation and in public funding. This comprehensive approach calls for both a single, strong, autonomous public service content provider and for public service programming across the other sectors i.e. commercial and community content providers. We need more public service

broadcasting/communications throughout the entire system rather than a ‘silozation’ or a ghettoization of communications providers.

Commercial content providers work for profit; public service content providers, such as our current public service broadcaster and community media, work for public good. The market will look after its own interests – the pursuit of profit - and will not provide unprofitable material. The other two sectors, traditionally RTE and the community media sector, work for the public good and not for profit. It seems to me that these two sectors need the largest proportion of public funds for public service content provision precisely because this is their remit. The provision of public good cannot be left in private hands but public services need to be paid for from public funds. Therefore, I propose funding public service content providers at national level along the lines of a streamlined RTE and at local level along the lines of licensed community radio stations. However, as privately owned content providers will attract audiences, it seems to me that the commercial sector needs to be incentivised to carry some public service programming and so a system of distributing funds for public service programming needs to be rolled out across all three sectors in addition to primary, core funding for a primary public service content provider, such as RTE and community media/content providers.

An example of the necessity to pay for such content on all platforms became really clear to me when my colleague in NUI, Galway, Dr John Walsh and I undertook a review of the amount of Irish language programming on all three sectors of licensed Irish radio stations in 2017 and 2018. We were disappointed, but not surprised, to find that the average weekly output of Irish or bilingual (in many cases just ‘cúpla focal’) across all stations was a mere 3.3 hours out of the 168 hours per week broadcast by most stations). This is despite the legislative requirements placed on RTE and the contractual obligations undertaken by independent (commercial and community) radio stations with the BAI to provide far more than these levels. If this is the case today, when we have regulation, licenses, monitoring etc. how much worse can we expect matters to be in the future when the market will decide what gets priority?

Successive census statistics show that the Irish language is important to the nation at a deeply symbolic level. Irish people use the existence of the language as a way of marking their difference from others, even when they do not speak it themselves. A significant proportion of people are actively trying to use the language in more than a symbolic way, as a part of their daily lives (See the rise of Gaelscoileanna etc.). However, unless the Irish language is heard on the airwaves, on social media and on digital/on-line content, the numbers speaking the language and therefore the language itself will die. Constitutionally, legislatively, sentimentally and symbolically the Irish nation declares a desire for the language to be preserved. Unless our media promotes it, it will continue to decline and this is one of the most important areas that this Commission needs to consider. A brief examination of the history of Irish broadcasting and of the failure of the Irish education system to revive the language reveals that economic arguments won out over cultural and national objectives every time. Ireland has left the dark days of dire poverty behind and it is time for public bodies, such as this Commission, to take a very strong stand in the recommendations that it makes to the Irish government to address these failures. A strong, clear policy for Irish language content on the single public service content provider and

across all platforms will require major investment, a creative strategy and positive enthusiasm and commitment rather than what we have experienced to date – a series of weak, unco-ordinated, poorly resourced mish mash of policies that merely pay lip service to the ideals of preserving and promoting the Irish language.

News and Current Affairs should become part of the remit of Sound and Vision or of a separate scheme. Commercial enterprises will not pay for costly news and current affairs as regulation becomes more difficult to enforce on new platforms. State funding must be ringfenced to protect newsrooms and independent journalism for an informed citizenry and for a healthy democracy.

2.a. Finance.

Specific schemes along the lines of the current Sound and Vision scheme could be developed but the principle should be that any broadcaster could access funds through competition or on a merit basis.

The terms and conditions of the competition could be founded on some of the principles guiding the current Sound and Vision scheme, but these should be expanded. For example there should be an opportunity for content providers to win a contract to provide certain types of programming over a relatively long period e.g. 5 years to serve certain audiences. News and current affairs should be funded.

This would mean whatever comes in place of RTE would continue to receive the greatest portion of public funds, however these are generated. This would be followed by core funding for community media. Finally, all Irish content providers would be supported to ensure provision of good quality news, current affairs and other public service programming.

3. Clear identification of and easy access to this public service content and to Irish content from all sectors

There is a huge and rapidly increasing amount of choice for audiences. The survival of the fittest means that global corporations, multi-million, international organisations are the ones that shout the loudest and win the most attention. Therefore it is crucial to ensure that Irish audiences can find Irish and public service content easily and that they can access it free of charge. We need to continue to ensure that Irish content comes up on top in any searches, digital and otherwise, just as RTE 1 and 2, Virgin and TG4 all come up on Saorview as channels 1,2, 3 and 4 respectively at the moment.

It will be difficult to ensure that Irish material doesn't get lost in the mire of digital platforms. We can't predict the number or type of platforms that will be bidding for our attention so this Commission needs to consider the principles of identification of content and of easy access to content as matters of priority.

3.a. Finance

The principles of ensuring easy identification of Irish and Irish public service content and of enabling easy access to them free of charge should inform a funded set of mechanisms that will guide Irish citizens towards good Irish public service content in the future.

These will need to be flexible so that they can respond rapidly to changes in the mediascape and to threats from global communications corporations which may lead to Irish and Irish public service content being hidden or lost from view.

It may be advisable to set up a separate public body or a unit within any future regulator or commission to ensure that these mechanisms work effectively. This unit and the provision of means to guide Irish citizens to Irish and Irish public service content will need resourcing.

I believe that this should also come from central taxation. We already pay for a proportion of the public good in our health, education, roads, national defence and legal systems. I believe that it is equally important for a national sense of identity and confidence and for an informed and actively engaged citizenry to have clear road maps that they can use to negotiate the huge volume of content that they will be exposed to. They will need help and support so that they can find and engage with Irish and Irish public service content and easily and for free.

4. Media literacy education

The influence of the contemporary media is often said to be greater than that of traditional institutions in helping us form our opinions, attitudes, values and even our identity(ies). As the number and types of content provision increase, the clamour of voices can become deafening and difficult to negotiate. Individuals, as private persons and as citizens in a democracy, need to be educated to understand the provenance and influence of the messages they receive and of the content that they engage with.

Independent news and current affairs provision go part of the way in building an educated electorate but the ability to negotiate, interpret and use content is crucial in protecting and developing a free thinking, reflective and engaged citizenry.

This education needs to be formal, through the schools but it also needs to be provided in orchestrated campaigns and programmes across all media platforms accessed by Irish adults on an ongoing basis. The Department of Education needs to introduce Media Studies at primary and secondary level and the Department of Media/Communications needs to plan and resource media literacy campaigns on all platforms as a matter of priority.

Community media already engage in media literacy education on an accredited basis through QQ1 and through the training thousands of volunteers receive when they work in the stations. Media Literacy Ireland also do sterling work in this regard. Both have strong international links and conduct research to inform best practice and should be resourced under this strand.

4.a. Finance

Once again, funding for this needs to come from central funds/tax revenue. However, the financing of this really important education can be split in at least two parts. One part should come from the budget of the Department of Education so that the subject of Media Studies is put on the core curriculum of both primary and secondary schools. Another part could come directly through the Department of Media/Communications so that a public body or a unit of a larger regulator/commission (depending on its constitution) is established to work on providing media literacy education, training and programming across all platforms.

Part Two: Responses to questions posed in template.

Question 1. How should Government develop and support the concept and role of public service media and what should its role in relation to public service content in the wider media be?

The Irish Government needs to take a four track approach (See Part 1 above) that ensures provision of:

1. A strong public service content provider
2. Provision of public service content across all sectors and platforms
3. Clear identification of and easy access to this public service content and to Irish content from all sectors
4. Media literacy education.

What can be learned from the evolution of public service media over the last decade?

Lack of funding has driven RTE to crisis management e.g. the poor quality of some programming, the uncertainty about its future and the sale of land. RTE and public service broadcast programming on all other licensed stations need to be assured of a steady and viable funding source so that they can plan and develop effectively.

The hybrid model of funding for RTE has stymied its development over its lifetime. Having to compete with other broadcasters for advertising, especially now that so much of it is moving on-line, means that RTE is never secure enough to fulfil its key mission of public service broadcasting. It is always worried about competition 'stealing' its audiences so it takes 'safe', commercial decisions rather than decisions based on the ideals of public service broadcasting as outlined in the 2001 Act.

What systems may be required to support and sustain public service content, e.g. high quality, independent journalism, in an increasingly competitive and consolidated market?

The Commission needs to decide who it wants to see operating unbiased, trustworthy, objective news services (in so far as any service can reach these ideals). If it decides not to fund one strong institution, it leaves the people exposed to receiving news paid for by vested interests, so this cannot happen.

The Commission should think expansively and innovatively and consider funding quality news and journalism across all three sectors of the broadcasting service. News teams in independent, commercial radio and television stations have been reduced radically in the last decade. Without funding, business oriented models of broadcasting will cut costs as much as they can so, we need two things here – a new type of regulation of the independent sector and funding for independent journalists and quality newsrooms across all three sectors of broadcasting/content provision – public service, commercial and community.

How might public service media be more effective in promoting the Irish language, sport and culture?

The excellent work done by TG4 should be properly supported by increasing and guaranteeing adequate funding. Raidió na Life should be supported financially and otherwise to become a national, youth based, music driven Irish language radio service with paid staff and act as a hub for Irish language social media services. However, Irish should not be ghettoised to be heard only on single language channels such as these and RTE Raidió na Gaeltachta. The Irish language should be heard regularly as a normal part of schedules on all broadcasters. The programmes should not be about the Irish language, they should be broadcast in the Irish language as a normal language of communication and they could be about any topic (as they are on TG4 and Raidió na Life).

RTE Raidió na Gaeltachta needs a complete makeover. It needs to go back to first principles and serve its dwindling Gaeltacht communities. It shouldn't have to try to be all things to all listeners. It should be complemented by other national services such as a youth station along the lines of Raidió na Life with paid staff and a national Irish language general station along the lines of RTE Radio One or Newstalk.

Irish sport, at all levels, needs the oxygen of fan support and all stations, in each of three sectors, need funding to cover and promote this hugely important part of our culture and our nations' health – both physical and mental.

Irish culture is hard to define and it is not exclusive to the "De Valera" version of the first half of the last century. An extension or new version of the Sound and Vision would be most helpful here.

That said, there is a glaring need for a radio station that plays traditional Irish music, in all its many forms, to be available to all. We currently pay for material on RTE that is available elsewhere. Every country has a classical music station and these can be accessed on-line. Music of all genres, especially commercially successful music, is available on a number of platforms to Irish people and does not require any state aid or public funding. Our great legacy and unique contribution to the body of world musics is largely ignored on all broadcasters, even by RTE Raidió na Gaeltachta. I believe that the establishment of a broadcaster that showcases our rich musical heritage and current expressions of it is badly needed.

Although most independent radio stations are contractually bound to ensure that 20% of all music played is of Irish origin, unfortunately there is very little air time given to new acts and new work. We need a policy that supports and promotes Irish music and Irish musicians of all genres and all genders, from rock to traditional and from hip hop to classical.

How might public service media better respond to the needs and expectations of the public?

Public service media need to remember who owns them and who pays for them. They need to undertake serious and real engagement with their audiences to find out what they need and expect from them. There is very little research done on what people might like. RTE have been particularly bad at asking this question and they continually borrow or copy formats and production styles from other broadcasters without considering what they might do themselves that may be new, innovative and relevant to Irish audiences. There is a Dublin 4 centric attitude in Montrose that goes far deeper than just geography and RTE is often far removed from the hearts and minds of Irish people. Back in the 1940s, Radio Eireann was appalled to discover that their most popular programme was traditional dance music and again in the last decade, RTE was shocked to find that the Late Late's Country Music show had the third highest viewership ever. The public service broadcaster/content provider needs to find out what Irish people are interested in and what Irish people need. They need funding to do this research regularly and then to experiment with formats, with ideas and with approaches to better serve their public(s).

What can we learn from other jurisdictions?

We can avoid the mistake of the USA in not having a strong, public service broadcaster so that we do not replicate the polarisation of news services into right and left.

We could copy the BBC's single source funding model so that RTE is not trying to compete commercially with many others. Even though the BBC model is under constant attack, it supports a strong and much admired institution. It may not be a popular suggestion but it should be considered. However, this funding can no longer come from a separate or 'stealth' tax such as a licence fee. We need funding to come from central tax funds, to be increased automatically as costs increase and to be controlled and administered 'at one remove' by a public body along the lines of the current regulator perhaps.

We could learn from Australia's twin stations - the ABC for the general population and SBS for special communities in particular serving diverse cultures and language groups. Also from the provision of many public service channels across different parts of the country, as is also the case in the UK.

There is no need for publicly funded content providers to provide content that is readily available elsewhere.

Question 2. How should public service media be financed sustainably?

Funding should come directly from the Exchequer/Department of Finance. This would put an end to the hated licence fee which is not functioning well. It would need to be ringfenced, as the arguments against centralised funding are obvious. Direct funding of a body that is independent of government, a type of BAI, could then ensure that distribution be made according to legislation and robust regulations. The regulatory body or another, separate body if required, would ensure that politicians and ministers had no control of the distribution of funds. There would no longer be a 'stealth' tax and it would remove the difficulty of tracking down evaders and TV sets and of administering the collection of fees.

RTE (or the main public service content provider) should no longer operate as a hybrid service funded by licence fee and advertising. It should be solely funded by the new fund so that it could concentrate on the quality of its broadcasting to deliver its public service remit.

Other stations could apply on a competition basis for blocks of funding to cover sustainable, independent journalism and specific programming needs.

Some version of the Sound and Vision scheme could also be funded from these central funds to provide interesting and appropriate public service programming on all three sectors.

What is the best model for future funding of public service media in Ireland?

I believe that funding should come from the central exchequer, money that is raised by general taxation. It should be a proportion of those taxes so that it rises as the economy improves and costs rise but should be protected from falling too low in times of economic hardship as the public good provided by public service content must be protected. It should be administered by an independent public body to keep public service content provision separate from state influence.

What approach best supports independent editorial oversight while achieving value for money and delivering on public service aims?

A healthy and renewable bank balance that is independent of government, civil servants, politicians and big business will go a long way towards ensuring editorial independence. Value for money and the delivery of public service aims can be assured by regularly renegotiated contracts for the provision of these funds and by monitoring to ensure these are achieved. "He who pays the piper calls the tune" rings true and that is why it is so important for the public service provider to be properly and independently resourced.

What opportunities exist to develop and implement business model and organisational changes within the public service broadcasters (RTÉ and TG4)?

This is a very detailed question and presumes that people know how each of them is set up. This is not the case.

The most important priority for me is to give TG4 more staff and more money to develop. TG4 may be better off returning to a new version of RTE or it may be better off staying separate - who knows what the models are, let alone what they might become? It seems to

me that RTE and TG4 could best answer this question. However, this Commission needs to ask how a new business and organisation model for public service content provision should be developed, as if nothing previously existed so that it can actually introduce appropriate and efficient models rather than tinkering with existing, unsatisfactory ones. This Commission has the opportunity to do some “green field” thinking and to imagine an Irish media landscape as though RTE didn’t already exist. It should do this first – ask the question of what the Irish people want and need and then see how RTE and TG4 might be re-imagined, resourced and re-structured to provide this.

How might content commissioning, including by RTÉ, TG4 and the BAI Sound and Vision scheme, be adjusted/improved/reformed to better achieve public service aims?

Independent radio and television stations (Commercial and Community) should be able to apply to draw down some funding without having a specific programme or producer in mind. They could then develop and operate their own commissioning with more freedom. This should run in tandem with S&V, it shouldn’t replace the excellent work done by the many rounds of that scheme, but it could provide for more locally generated programming.

RTE and TG4 both need a lot more funding if they are to commission more work and ensure that it is work that is in line with their public service remits.

A scheme to resource independent, quality news and current affairs programming needs to be established.

The remit of Sound and Vision or a similar scheme could be expanded and the amount of funding allocated to such schemes needs to be hugely increased and changed (i.e. no longer be a percentage of television licence fee income. As stated above, the licence fee needs to go.)

How should public funding or tax reliefs be apportioned to Public Service Content providers?

In the two track approach outlined above, one institution – the main public service content provider, currently RTE - should get a generous proportion that allows it not just to sustain itself but to develop and improve. Community media, the not-for-profit sector that works for social benefit and is run by and for the audience themselves need core funding to continue this valuable work. This is particularly important as content is provided more and more by producers and corporations that are very far removed from local communities.

Commercial and community content providers should have access to different types of ongoing funding schemes on a competitive or merit basis e.g. funding for independent news and current affairs; funding for specific programming tied to public service aims, see 2001 Act and funding tied to broadcast programmes as currently under the Sound and Vision Scheme.

The future will not be in broadcast media only and any scheme or provision should work across all platforms from the oldest (print) to the newest (social and on-line media) and whatever comes after these in the future.

What does the shift in advertising revenues towards big tech firms mean for the future of print, online and broadcast media?

They have to adapt and change and they are doing so. Commercial broadcasters/content providers operate as any other business in a competitive market do – they compete commercially and they generate profits for their shareholders/owners. A single public service content provider such as RTE and not-for-profit community media need to be free of these pressures to concentrate on quality provision. Both of these sectors are owned by the public and should have access to the central funds outlined above. Both provide services to the public, one at national the other at local, community level, that commercial broadcasters have no interest, moral or financial, in providing. This means that the valuable work both public service and community media do needs to be sustained by central funding, independently administered and overseen by an independent regulator. Commercial operators will adjust their content provision to maximise audiences and therefore maximise advertising revenue. The cheapest production of content for the highest audience numbers is what shareholders require and this works against quality public service content provision. If we fund our public service content from direct taxation, we release those content providers who want to concentrate on quality, public service content from the exhausting and increasingly less productive search for advertising. A search that frequently drives quality down and results only in formats, mainstream and commercially driven content provision.

What role is there for alternative funding models for Public Service Content providers – voluntary, cooperative, crowdsourcing, subscription?

Forget them! This is passing the responsibility for a public service that is vital for our democracy into the world of wishful fantasy. Public Radio and Television in the USA is funded in this way and they make no impression on society as they are so strapped for cash. That's in a country with a tradition of people paying subscriptions for services. That tradition doesn't exist in Ireland, no more than paying for water, Irish people want their media for free and no less than water, the media play a vital role in sustaining healthy and vital life and should be paid for by public funds. Essential provision for services for the public good such as education and health have often been left to charitable organisations (religious and otherwise) in this country and the problems and complications that result are well known. The funding models suggested above are not only unreliable and unlikely to provide much money but they leave the door open to all of these same problems. The provision of a public good should be paid for from public funds.

Question 3. How should media be governed and regulated?

What regulatory changes at EU or global level might impact on the governance of public service media in the period ahead?

There is a need for international or at least EU regulation of content. How this will develop is only being discussed and imagined now and digital media change so quickly that it is hard to see its form in any detail.

However, all other EU regulators of industry etc. work from general, agreed principles and the regulation of the media/content provision will be no different. We will be able to adapt and implement EU regulations, indeed we are already to the fore in imagining the shape of digital regulation for Europe, so the only thing to fear is whether or not such regulation will work.

What we can do is manage our own portion and we need to extend the workforce of the current regulator, the BAI, to do this for the traditional broadcasters on radio and TV. A new regulatory authority that would cover content across all platforms from print to digital would be a sensible move even if it is not yet clear how some content that is disseminated on social media for example could be regulated. This should be governed by legislation and it should consist of a large executive and a rotating board for oversight and strategic planning.

Many content providers will operate outside of Ireland's jurisdiction and regulation. This is already happening with social media, video on demand etc and the AVMSD and other EU initiatives are trying to play catch up. The Irish government is trying to do likewise and this is advisable but legislation, licensing, even regulation are all becoming less and less relevant as technology and its use by big businesses gain more traction.

All the Irish government can do through legislation and timely, well informed interventions is protect Irish interests by ensuring that Irish audiences get access to Irish material on line and otherwise and by ensuring that Irish audiences can easily identify and find Irish material on line and elsewhere.

What challenges are posed to a vibrant, independent public service media by increasing consolidation / declining plurality of ownership in the Irish market?

A lack of diversity and plurality

A mainstreaming of perspective

The promotion of a capitalist and largely patriarchal ideologies

Less job opportunities as newsrooms and presenters are centralised

The loss of the local, even in local radio.

Community radio and television stations go a long way to mitigate against the damage such consolidation wreaks. Better funding for the third sector of Irish media – the community sector which is not-for-profit and voluntary – would help combat some of the disastrous consequences of consolidation and the formation of chains.

Are current legislative and regulatory controls for public service media adequate?

As outlined above, regulation and even legislation will prove less and less effective as content provision no longer requires licensing. However, we need to keep trying to combat threats to democracy, to Irish identity and self-confidence and to protect all of our citizens. The current form of regulation as exercised by the BAI is excellent. It is trusted by broadcasters and it has developed a good working relationship with them without compromising its regulatory responsibilities in any way.

The suggestion of having three commissioners or separate commissions for different types of providers is not advisable in my opinion. Clarity is needed in a crowded multi media space and a single, strong, well resourced regulator that looks after content rather than platforms will be able to operate more flexibly and swiftly than a number of commissions or regulators that would operate in more narrowly defined fields.

The idea of having full time paid commissioners is worth considering but an independent, rotating board for oversight and vision is required.

The current system of paying for the regulator through levies imposed on those regulated cannot be sustained.