**Submission to House of Lords Select Committee on Communications, inquiry into “Public service broadcasting in the age of video on demand”**

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Whilst the submission is made on behalf of the Institute of Economic Affairs, the views are those of the authors. The Institute has no corporate view

**16th April 2019**

**Summary**

* There is a long history of specific institutions restricting competition in broadcasting and changing the definition of public service broadcasting to serve producer rather than more general interests.
* The current definition of public service broadcasting used by Ofcom is not coherent. Definitions used by the House of Lords Communications Committee (in a previous report) and in a recent government Green Paper make more sense. They relate to content which would be under-produced in the market but still have (for example) educational value.
* The nature of the broadcast market has changed to such a degree that the interests of public service broadcasting can no longer be served by focusing on institutions rather than looking for the best way to achieve the end objectives.
* Furthermore, the nature of broadcasting has become so diverse, that broadcasting should be seen as one method of achieving wider education and cultural objectives and policy in relation to public service broadcasting should reflect this: there is no need for specific public service broadcasting policy.
* The BBC should be financed by subscription and probably be owned by its subscribers. It should provide edifying and sophisticated programming to a wide international market and would be able to do so profitably.
* The fact that the market for broadcasting is now international means that much artistic, educational and cultural programming which might not have been economic in the past may now be economic and not need subsidy (for example, the potential audience for an arts programme in the English language on post-reformation Dutch painters can be drawn from the whole English speaking world, if not the whole world).
* Niche providers are often better than the BBC at ensuring the broadcasting of good quality content to meet minority tastes. The BBC is clearly more attractive to higher-income white audiences, despite the impression it tries to convey in its marketing.

**Question 1**

**What is the value of public service broadcasting? Is the concept becoming outdated? Does public service broadcasting do enough to reflect and serve the demographics of the UK? In answering respondents may wish to consider characteristics such as:**

**a) age,**

**b) gender,**

**c) ethnic background,**

**d) the nations and regions of the UK,**

**e) mental and physical ability,**

**f) ability to pay for services**

**1.1 Vested interests and public service broadcasting**

1.1.1 To understand whether public service broadcasting is outdated or whether it has value, we need to return to the original purpose of public service broadcasting. It is the evolution of this purpose and its current resting point that is relevant for this inquiry.

1.1.2 It should be noted that the interests that wish to protect the funding model of public service broadcasting have subtly changed its meaning as earlier meanings have become irrelevant. It could reasonably be asked whether there is an element of ex-post rationalisation happening here in order to protect vested interests. That is not to say that there should be no public policy interest in promoting public service broadcasting. However, it is highly unlikely that best approach to doing so in 2019 should essentially be the same as that in 1960 (or, indeed, 1945).

1.1.3 The television licence fee evolved out of a system whereby the post office working with radio manufacturers charged owners of radio sets to receive programmes. It was designed to create a hypothecated charge to overcome what economists describe as the “public good” aspects of broadcasting.

1.1.4 Public goods are goods which are not excludable (so it is difficult to stop people who do not pay from benefiting from them) and non-rivalrous (that is the marginal cost of serving an additional user is close to zero). Given the available technology until the 1980s, a plausible case could be made that broadcasting had these qualities. In addition, because of spectrum scarcity, it was argued that broadcasting had the attributes of a natural monopoly. However, in a series of papers, largely by Ronald Coase, the natural monopoly argument was firmly debunked in the 1950s. It is clear that the development of competition through the provision of additional television channels and the development of cable television was restricted by regulation and not by natural monopoly characteristics. The same vested interests still have a strong hold over policy today.

1.1.5 There is also an important qualification to the public good argument for the current model of financing public service broadcasting. Once commercial television developed, it would have been possible to sell television sets which only received commercial television by limiting the spectrum they received (thus making individual channels excludable). Indeed, had regulation not prohibited the development of commercial television, this would have been possible from a much earlier time and certainly possible using cable technology. However, any television owner had to (and still does have to) pay for a television licence even if the owner does not watch BBC or, indeed, even if the television is designed in such a way that the owner was unable to receive BBC signals. Throughout the post-war period, the interests of the BBC have been protected. Arguably, even in this period, the hypothecated television tax (the TV licence) should only have applied for those sets which were able to receive BBC signals.

1.1.6 When commercial television was permitted, the government limited the number of commercial channels and granted licences in such a way that it was possible for such channels to make profits and also have public service obligations imposed upon them. Though the extent of those obligations has reduced, this basic model of funding and thinking about public service broadcasting is still in place. It is clear that this model is out-dated and funding regimes should change (see later questions 6).

**1.2 New justifications and objectives for public service broadcasting**

1.2.1 The current funding model and the maintenance of the special status of the BBC has been facilitated by a change in the definition of public service broadcasting which allows the BBC to justify its special status. However, even if it is accepted that the new justifications of public service broadcasting are valid, they do not lead us to the conclusion that the current funding model is the correct one (again, see Question 6). Different justifications lead to different conclusions about how to fund public service broadcasting.

1.2.2 Ofcom’s current definition of public service broadcasting (paraphrased slightly to ensure grammatical sense in the context in which it is quoted below) is as follows[[1]](#footnote-1):

* PSB should Inform our understanding of the world through news, information and analysis of current events and ideas.
* PSB stimulates knowledge and learning to stimulate our interest in, and knowledge of, arts, science, history and other topics, through content that is accessible and can encourage informal learning.
* PSB reflects UK cultural identity and reflects and strengthens cultural identity through original programming at UK, national and regional level, on occasion bringing audiences together for shared experiences.
* [PSB should] [r]epresent diversity and alternative viewpoints, to make us aware of different cultures and alternative viewpoints, through programmes that reflect the lives of other people and other communities, both within the UK and elsewhere.

1.2.3 The characteristics of public service broadcasting suggested by Ofcom are that it is:

* High Quality.
* Well-funded and well-produced.
* Original new UK content rather than repeats or acquisitions,
* Innovative breaking new ideas or re-inventing exciting approaches, rather than copying old ones.
* Challenging, thus making viewers think.
* Widely available If content is publicly funded: a large majority of citizens need to be given a chance to watch it.
* Distinctive.

1.2.4 These objectives and characteristics are, in fact, already outdated and do not make obvious sense. For example, public service broadcasting is supposed to inform our understanding of the world and stimulate learning. Why, then, does it have to be original UK content? Can the objective not be achieved through overseas programmes or even repeats? Arguably, Kenneth Clarke’s *Civilisation,* still available from BBC iPlayer, informs our understanding of the world and fulfils any reasonable definition of public service broadcasting. If there are any legitimate policy objectives in relation to encouraging new, UK production surely these are matters for industrial policy and not broadcasting policy. Indeed, it seems contradictory that public service broadcasting is supposed to open us up to new cultures and yet be delivered in a framework that is explicitly protectionist with some nationalistic overtones.

1.2.5 Furthermore, why does public service broadcasting have to be well-funded as well as well-produced? Is it not enough for it to be well-produced? Why should it be available to a large majority of citizens when different groups (whether defined by ethnic minority or otherwise) will have different tastes? Is Welsh language programming, for example, not part of public service broadcasting?

**1.3 Public service broadcasting as such is an outdated concept**

1.3.1 Changes in technology mean that policy in relation to public service broadcasting *as such* is no longer necessary. This does not mean that there are no areas of public policy concern to which broadcasting might make a contribution. Broadcasting is relevant to the promotion of education, the development of culture and so on[[2]](#footnote-2). However, the policy instruments government should use if it believes that intervention is necessary to achieve the given objectives lie in the field of education (for example universities or educational publishers could work with content producers or content producers could produce content for schools funded through the education budget) and arts and culture.

1.3.2 In public policy terms, there is excessive focus on the means to an end (broadcasting policy) and particular institutional approaches (the maintenance of specific television channels in their current form). Instead, we focus on the ends and consider alternative means of meeting those ends. There is no distinct legitimate government policy sphere headed “public service broadcasting” for which a separate set of policy tools is needed though broadcast content might well be the appropriate policy means of achieving desired ends in areas such as education, arts, culture, community cohesion etc.

**1.4 Public service broadcasting and its intended audience**

1.4.1 It is difficult to know whether public service broadcasting is especially effective in reaching its audience because there are no realistic comparators, given the difficulty of other providers of content competing with free-to-air content that has to be paid for through the TV licence regardless of whether it is watched. Despite this obstacle, however, it is notable Classic FM has 0.5 million listeners under the age of 25 each week. This compares with only 1.8 million people who listen to Radio 3 in total. There is also a wide variety of content producers and deliverers serving minority audiences in the commercial and not-for-profit sectors outside those broadcasters that specifically have public service obligations. It seems that, despite huge government support for the established institutions, commercial and not-for-profit providers are beginning to outflank the established providers.

1.4.2 Although it is suggested by the BBC (see, for example BBC Annual Report and Accounts, 2017/18), that the service is popular and reaches all households and tastes, the data quoted by the BBC itself raises legitimate questions. The BBC states that 56 per cent of UK adults think that the BBC is effective at reflecting people like them. This figure and others like them are placed in front of pictures of ethnic minority individuals. However, this figure alone tells us nothing about how the BBC is perceived in different parts of the community (all the 56 per cent, for example, could be middle-class or better-off white people). Detailed inspection of the figures finds that, in fact, 64 per cent of ABC1s (higher social class and income people) believe that the BBC reflects people like them whereas only 48 per cent of BAME respondents believe this. Thus, the graphic that the BBC used should really have been in front of a white middle-class person. BAME individuals watch half as much BBC television and listen to half as much BBC radio as the ABC1 group (ibid). The document referred to in the House of Lords brief is even more damning in its indictment of the ability of the BBC to deliver content which is appreciated by wide groups of the population[[3]](#footnote-3). This again demonstrates how outdated the concept of public service broadcasting is. It also illustrates the contradiction between the various characteristics and definitions of public service broadcasting.

1.4.3 We should view broadcasting and other forms of screen media through the same lens as we view education and arts policy more generally and not through an institutional framework that greatly privileges one provider and lays obligations on a small range of other providers. The likelihood is that, in the modern world, public service broadcasting objectives are best served by a range of providers, large and small, some of them niche and some of them broadcasting internationally to groups of people with similar interests in different countries. Policy should not revolve largely around a single institution.

1.4.4 The focus on producer interests in the discussion of public service broadcasting comes through in the background to the questions when it is stated that: “It has been suggested that these big budget productions are pricing public service broadcasters out of the market by inflating production costs and raising viewers’ expectations.” Most recently public service broadcasting has been re-interpreted to relate to forms of broadcasting that have wider societal benefits that would lead to such broadcasting being under-produced or not being of the requisite quality if left to the market. However, the statement in the questions seems to suggest that the market is capable of producing broadcasting of high quality and the broadcasters with specific public service obligations are unable complete. It seems to be further suggesting that the fact that the market is providing content which it is often suggested it cannot provide is leaving the state-privileged provider of public service broadcasting in a difficult position and that this is a problem. This focus on producer interests is itself problematic and demonstrates how discussions of public service broadcasting are outdated and seem not to be focusing on the “public”, the “service” or the “broadcast”, but on the “broadcaster”.

**Question 4 Are the obligations on public service broadcasters appropriate? Does the regulatory regime allow them to do so? (sic)**

**Question 6 How can commercial public service broadcasters fund original productions for UK audiences at a time of declining advertising revenues? How might public service funding regimes—including the BBC licence fee—be adjusted?**

**4.1 The diverse tapestry of provision that meets public service objectives**

4.1.1 The requirement on commercial broadcasters to meet public service obligations is anachronistic. There are over 500 free-to-air channels providing the kind of content that would, if produced by the BBC, be defined as meeting public service obligations. In addition, there are other content providers (many of them free) which meet the needs of and provide educational, artistic and cultural content for minorities that are supposed to be served by commercial channels with public service obligations.

4.1.2 The BBC is privileged in the proper sense of the word in that it is exempt from the usual competition laws that apply in the UK and state-aid rules that apply in the EU. It is able to use its position as a recipient of income generated from what is effectively a hypothecated tax to compete with commercial providers both in the public service sphere (in so far as that concept can be defined) and in the commercial sphere. At the same time, the licence fee regime limits the BBC. Its brand is respected outside the UK where around 90 per cent of households with television sets live. Given greater commercial freedoms, it could leverage its brand and be more prominent both as a producer and broadcaster of high-quality material.

4.1.3 As is noted in answers to other questions, there are huge numbers of producers and deliverers of content which is related to at least some of the core objectives that have been defined by Ofcom as constituting public service broadcasting. Many of these operate on an international scale. National Geographic, for example, is watched by nearly 30 per cent of Americans over 30 at least once a month. Many others fill small local niches (including tiny, volunteer-staffed local radio stations). Given this rich tapestry of which the BBC is only a small part and a restrained part, the funding regime should be changed. It would also be best to relieve current commercial broadcasters of public service obligations where they still exist. The question would then remain as to how to deal with the BBC, its funding and the funding of public service broadcasting.

**4.2 Public service broadcasting in the modern age and implications for funding**

4.2.1 It has already been recognised in an earlier House of Lords Report that public service broadcasting has moved on and, implicitly, that policy should also move on from a consideration of institutions to a policy focused on broadcast content. The House of Lords (2009)[[4]](#footnote-4) Communications Committee report stated: “Nevertheless the interpretation of public service broadcasting as content that the market does not sufficiently provide is gaining increasing support. It implies a focus on defining the core elements of public service provision that should, as a matter of public policy, continue to be supported. Such elements might include, for example, national and regional news, current affairs programmes, the arts, children’s programming, programmes dealing with religion and other beliefs and UK content.”

4.2.2 A technological revolution has completely changed the landscape and the legitimate debate is not about support for particular institutions but the appropriate domain of the state when it comes to supporting certain types of broadcasting. However, broadcasting is one amongst many means to achieve policy ends in the field of culture, education etc and institutional broadcasters that currently receive support are just one form of broadcaster amongst many. Furthermore, it seems almost certain that the television set (on which the current tax is levied to support public service broadcasting) will cease to exist as a distinct kind of device, as it will come to be combined with other kinds of devices and platforms. Many people will simply not have a conventional television set and will watch television shows on their mobile phone or laptop. They will not watch programmes in the conventional way, and content will increasingly be produced and delivered by organisations very different from the networks and stations of the past, including the BBC.

4.2.3 Attempts to make people watching the BBC on other forms of devices pay for a TV licence may or may not be successful. However, if they are successful, they effectively turn the BBC into a subscription service unless the funding model is through a “device tax”.

4.2.4 As such, now that both individual programmes and channels can be encrypted and made excludable, the appropriate, and sustainable way of funding the BBC is via subscription, either on a period basis or pay-per-view or a mixture of the two.

4.2.5 Interestingly, although the government Green Paper of 2015 came to a similar conclusion to the House of Lords Report mentioned in 4.2.1, there was still a focus on maintaining the privileged position of the BBC in the Green Paper. In the Green Paper (14) the justification for the BBC was that high quality PSB content has generally been seen as a “merit good”, which would be under-provided in a free market. It argued that public service broadcasters such as the BBC still deliver positive effects for society such as “extending democratic knowledge through news and current affairs, helping extend the UK’s influence and reputation abroad, addressing needs of audiences such as minority language groups, and serving audiences (such as children) where excessive advertising would be inappropriate. These goods would not be provided in sufficient volume by the market alone.”

4.2.6 This statement is highly contestable and certainly does not merit the word “would” appearing in the last sentence. However, let us assume that the provision of content that would be under-provided in a market is a legitimate, if contested, aim. The current model of funding, with its focus on a single institution, is both an inappropriate and an inefficient way to achieve the objective. Furthermore, it is likely that, if the BBC is constrained within its current funding model, it will not be able to have the global reach across a range of platforms that other broadcasters have. The BBC should either be allowed full commercial freedoms or become owned by its subscribers in the same way as the National Trust using the model proposed by Professor Sir Alan Peacock (it could then operate with full commercial freedoms internationally with the international business owned by the domestic subscribers). These approaches would provide the most sustainable ownership models for the BBC given rapidly changing technology whilst also ensuring that it retained its distinctiveness.

4.2.7 This leaves the question of the provision of content with public service objectives that, it is argued, will be under-supplied in the market. Recognising the problems with the current model, it is commonly suggested that an organisation modelled on the Arts Council is established to fund public service broadcasting from a range of providers (the so-called Arts Council for the Air). For example, an independent broadcaster could be subsidised to provide news in Welsh; Classic FM could be subsidised to broadcast concerts featuring young composers with less audience appeal; or the BBC could be subsidised to produce programmes on history (whilst the general model for funding the BBC was based on subscriptions of various kinds). There are various discussions of this approach in Booth ed (2016)[[5]](#footnote-5). However, despite its merits as compared with existing models of financing public service broadcasting, this proposed approach has itself now become outmoded.

4.2.8 Just a we do not have a “national books policy” or “national intellectual magazines policy” (still less a national “educational websites policy”) we do not need a national broadcasting policy as such. We should view broadcasting and other forms of screen media through the same lens as we view education and arts policy more generally and not through an institutional framework that greatly privileges one provider and lays obligations on a small range of other providers. The likelihood is that, in the modern world, public service interests (in so far as their definition means anything) are best served by a range of large providers and small providers, some of them niche and some of them broadcasting internationally to groups of people with similar interests in different countries. It should be within the remit of other areas of public policy to use broadcasting to achieve the objectives of these other areas of policy. This approach is already followed, for example, through collaborations between the BBC and the Open University. Just as various organisations sponsor the publication of books, other information sources, museums, the production of videos, and so on, for educational purposes, they could also sponsor the development of content for broadcasting. The Arts Council could give grants to producers and broadcasters to promote its objectives. The distinction between a performance in a theatre (subsidised by the Arts Council) and a niche television programme broadcast by the BBC but designed to achieve the same educational or cultural objectives as a theatre performance is a totally artificial one. Support for programming (whether provided to producers or broadcasting) would not have to cover the total cost of production and broadcasting, of course. As with special exhibitions or theatre performances, revenue can be obtained from a number of sources, not least from advertising and subscription income. As is noted in the answer to Question 10, the internationalisation of the market for broadcast content narrows considerably the range of content which, it can be argued, ought to be provided but is not provided by the market. It should also reduce the extent of any needed subsidy.

4.2.9 In the definition of public service broadcasting, reference is made to promoting national production. This is wholly misplaced. There is no reason to try to pursue the objectives of public service broadcasting specifically (even partly) through UK broadcasters. If it is desired to protect and promote a national broadcasting industry (in the same way that the film industry is protected) then this is the concern of industrial policy and not broadcasting policy.

**Question 7**

**How important is prominence for public service broadcasters? Can it be maintained in the face of rapid technological development and greater personalisation of content?**

7.1 The concept of “prominence” is totally outdated as far as public service broadcasting is concerned. There are really two questions here: “What is public service broadcasting?” And “What should be the policy framework in which it is delivered?”. These questions are addressed in other answers. But no sensible answer to either of these questions requires a public service broadcaster to be “prominent” as such. It might be the case that they are prominent because of the advantages of operating at scale. At the same time, it might be that myriad organisations operating within specific communities (whether defined by geography or otherwise) provide those services which are commonly described as “public service broadcasting” and are prominent within but not outside those communities. The idea that public service broadcasting is something that should be solely the responsibility of public policy and arise from action at national government level which should promote a small number of television channels is simply a hangover from the (perceived) problems of spectrum scarcity when (it was assumed) this was the only technically feasible approach.

**Question 8**

**Should there be new regulation of on-demand services? Does the revised Audio-visual Media Services Directive provide appropriate measures to ‘level the playing field’? How could on-demand services be encouraged to produce more content in the UK?**

8.1 It is difficult in practice to regulate on-demand services even to deal with questions such as incitement to violence, the broadcasting of pornography to children, and so on. This is especially so given that so much content is provided free of charge. Attempts to regulate further would hit insurmountable practical obstacles and are likely to make life more difficult for UK as opposed to other providers of content. Much, though not all, of the Audio-visual Media Services Directive is in this spirit.

8.2 The playing field can never be level when there is an institution (the BBC) which receives substantial amounts of quasi-tax funding and protection from the usual competition provisions that are applied in broadcasting. This includes, for example, allowing the BBC to have 75 per cent of the televised news market, something which would not be tolerated in relation to another provider. Competition at the national level in those markets in which the BBC operates is generally uneconomic given the effective subsidy the BBC receives (though the relative success of Classic FM as compared with Radio 3 demonstrates how a commercial radio station can seemingly out-complete a radio provider which is 100 per cent subsidised by the government where the existing provider is regarded as not satisfying audience taste or demand).

8.3 In relation to the question of the level playing field, though taxation of commercial providers of content is not mentioned explicitly in the questions, it is raised in the discussion preceding the questions. In particular, the question of the low level of tax relative to revenues for Netflix is mentioned with the implication that this may make competition from other public service providers more difficult. Putting aside the fact that the BBC receives a large public subsidy, it should be noted that the rate of tax paid by the BBC as a proportion of its *commercial* revenues is lower than that of Netflix[[6]](#footnote-6). Taxing content deliverers in order to subsidise locally produced content (as happens in France and Germany) privileges a specific type of content production rather than ensuring the efficient delivery of public service broadcasting. In other words, it elevates the producer above the consumer interest and elevates the producer interest above the objective of ensuring quality public service broadcasting.

8.4 Running through some of the questions, including this one, seems to be a bias in favour of UK content production. There is no obvious justification for such encouragement – certainly, not from the perspective of public service broadcasting policy. If it is desired to encourage the production of content within the UK, the justification for this needs to come from another angle (such as industrial policy) – though I would still find support for a particular industry in this way problematic, inappropriate and bad policy. It is interesting to see that the promotion of UK content has emerged as an objective of public service broadcasting without any clear analysis. The 2003 Communications Act referred to public service broadcasting in the UK (without reference to UK content) (264). Indeed, nearly all the clauses relating to public service broadcasting referred to the UK listener/viewer and not to the producer interests. The one exception was section 264, 6, j which stated that Ofcom should have regard to the proportion of production outside the M25, *insofar as content production originated from the UK* (paraphrased and italics not in original). It was Ofcom’s first review of public service broadcasting under the Act (page 7 and elsewhere) which introduced as a characteristic of public service broadcasting the idea that content should be from the UK and original. It is difficult to think of any justification for either of these prescriptions from the perspective of public service broadcasting policy alone. As such, there is no obvious reason why on-demand services should be encouraged to produce more UK content. More generally, it is interesting to note that this has evolved as an objective without being part of the legislative background.

**Question 10**

**What are the implications of ‘Britbox’? Is there scope for more collaboration amongst public service broadcasters? What more could PSBs do to compete with on demand services?**

10.1 Britbox demonstrates how the national policy framework of championing specific public service broadcasters to embrace approaches that are relevant to perceived UK audiences is becoming increasingly irrelevant. The audience potential for producers of content is the whole world (or at least that part of the world that can access electricity and either a television or mobile broadcasting device). Indeed, given how cheap interactive translation services are, the potential audience is not limited to the English-speaking or English-as-second-language worlds. As such, the provision of content of an especially educational nature or which appeals to minority tastes, which might struggle to be economic on a national scale can be marketed on an international scale. It is the same process which renders economic such a deep and wide market in journals, books and other related media at a range of different intellectual levels, aimed at different audiences and delivered in a variety of formats. Now that the market for broadcast content is international, a much wider range of content becomes economic and the perceived need to subsidise particular forms of content reduces if not disappears. The national lens through which broadcast policy is viewed is criticised in the chapter by Congdon in Booth (ed) (2016) as being extremely limiting for the BBC. If it is desired to promote the production of particular types of broadcast content, this should not be done by promoting particular national institutions (see answers to other questions). The liberation of the BBC when it comes to international broadcasting would benefit both the BBC and make easier the promotion of the objectives of public service broadcasting. The BBC could become a great international broadcaster (and possibly producer) of informative and educative content.

10.2 The scope for collaboration amongst broadcasters is immense – and this should cross national lines. Co-operation can take place at many levels (sharing content, platforms, production etc). It is important that such co-operation does not lead to action by state-protected broadcasters which is anti-competitive. However, this is less likely on an international scale as the market is defined much more widely than in a national or sub-national context.

1. See Ofcom’s annual report on public service broadcasting: <https://www.ofcom.org.uk/__data/assets/pdf_file/0019/103924/psb-annual-report-2017.pdf> [↑](#footnote-ref-1)
2. Putting aside debates as to the legitimate public policy interest in these things. [↑](#footnote-ref-2)
3. See: <https://www.ofcom.org.uk/__data/assets/pdf_file/0016/124252/kantar-bbc-qualitative-research.pdf> [↑](#footnote-ref-3)
4. House of Lords (2009) Public service broadcasting: short-term crisis, long-term future? Communications Committee, Session 2008–9. [↑](#footnote-ref-4)
5. Booth P. M. (ed) (2016), *In Focus: the Case for Privatising the BBC,* Hobart Paperback 182, Institute of Economic Affairs, London, UK. [↑](#footnote-ref-5)
6. See BBC reports and accounts, page 69: <http://downloads.bbc.co.uk/aboutthebbc/insidethebbc/reports/pdf/bbc_annualreport_201718.pdf> [↑](#footnote-ref-6)