BBC Trust
Trust decision on BBC’s Permanent Collections for BBC Radio 3, BBC Radio 4 and BBC Four
February 2011
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Summary of Trust Decision

We have received proposals from BBC management to develop the archive offerings of BBC Radio 3, BBC Radio 4 and BBC Four into permanent collections available online for an unlimited time. This document sets out our decision to approve these proposals and to change the service licences accordingly.

We have decided that the proposed changes do not constitute a significant change to the UK public services under the terms Clause 25 of the Framework Agreement (the Agreement) and that it is not necessary to apply a Public Value Test (PVT) to these plans before approving them.

Trust considerations and decisions

We believe that these proposals fit with the BBC’s public service mission and public purposes. The content that will be made available in these permanent collections is high-quality and distinctive. We believe that these additional opportunities to see or hear this content will therefore enhance the delivery of the purposes – particularly the Creativity and Education purposes – and contribute to the BBC’s overall editorial priority of inspiring knowledge, music and culture as set out in the ‘Putting Quality First’ strategy.

These proposals are one strand of the BBC’s overall archive strategy. Following the On Demand PVT in 2007, BBC services were restricted to offering only limited amounts of long form content available permanently online. Any expansion of this scope requires approval of the BBC Trust. These proposals for permanent collections will therefore require amendments to the key characteristics of the Radio 3, Radio 4, BBC Four and BBC Online service licences. Amendments to the key characteristics of a service licence are presumed to be significant changes, and carry a rebuttable presumption that the Trust should apply a PVT before approving such proposals.

In order for the Trust to decide whether BBC management’s plans are significant, Clause 25(2) of the Agreement provides four criteria for the Trust to consider in making this judgement: impact; financial implications; novelty and duration.

Our assessment against these criteria is that BBC management’s proposals do not constitute a significant change to the BBC’s UK public services. The remainder of this document sets out this assessment.
1. Background

Context

The BBC Trust has received proposals from BBC management to develop the archive offerings of BBC Radio 3, BBC Radio 4 and BBC Four into permanent collections available online for an unlimited time.

We note that the BBC’s plans for the permanent collections for Radio 3 and Radio 4 have been developed and set out in BBC management’s submission to our review of those services which is published separately. In parallel with this, BBC management have presented their proposals for BBC Four permanent collections.

The BBC’s ‘Putting Quality First’ strategy states that:

*It [the BBC] should make the universal availability of its archive a key objective over the next ten years, creating an engine for new public value—connecting audiences with the best of everything the BBC has ever made.*

There are several elements of the BBC’s archive strategy that are in development, involving both commercial and non-commercial release of archive programming.

In November 2010, the Trust received an update from the BBC Executive regarding the progress of the BBC’s archive strategy. At that time we endorsed the Executive's high level direction of travel, including the development of proposals for permanent collections, delivered through Radio 3, Radio 4 and BBC Four. We concluded that the specific proposals for these permanent collections should be considered alongside our service review of Radio 3, Radio 4 & Radio 7.

We will consider further developments of the BBC’s archive strategy as and when those are brought by BBC management.

The BBC’s proposals

As part of their overall archive strategy, BBC management propose to develop the archive offerings of Radio 3, Radio 4 and BBC Four into permanent collections that are available online for an unlimited time.

These proposals relate to the BBC’s overall editorial priority of *inspiring knowledge, music and culture* as set out in the ‘Putting Quality First’ strategy. Although these offers will differ slightly for each service, BBC management has selected these services for their focus on knowledge, culture and arts and the programming in the permanent collections will reflect this.

In order to enhance the audience experience and direct people to this content, the BBC will aim to provide and curate these permanent collections in ways that complement and support the linear broadcast services.

These services currently have a small amount of archive content available on their programme pages. BBC management plans to increase this to approximately 420 hours per annum for Radio 3, 1,000 hours per annum for Radio 4 and approximately 150 hours per annum for BBC Four. The BBC also currently makes a small amount of archive content
available under the bbc.co.uk/archive page. Where possible, this content will be re-housed under the relevant programme pages.

The programming that is included in these collections will generally be that with low commercial value, and will be subject to relevant rights approvals, cost constraints and windowing policies.

Trust considerations on significance of a change to the UK public services and decision to apply a PVT

The BBC Agreement\(^1\) requires that the Trust must apply a PVT before a decision is taken to make any significant change to the BBC’s UK Public Services. It includes a presumption that the Trust will apply a PVT when a proposal is made to change a key characteristic of any existing service, as set out in its service licence.

The PVT is a formal assessment process that requires the Trust to assess the public value of the proposed change, and Ofcom to assess the market impact of the proposed change. The PVT process provides for two periods of public consultation. Ordinarily the main assessment process lasts approximately six months.

In practice, the Trust will apply a PVT to a proposal made by the BBC Executive (including a proposed change to a key characteristic) only where it decides that the proposal constitutes a significant change under the terms of Clause 25 of the Agreement.

The Trust may still decide that there is no need for the PVT to be applied, but in such circumstances it must justify departing from the presumption. This document explains the assessment that we have made in this case and sets out the reasons for our decision not to conduct a PVT.

In deciding whether a proposal constitutes a significant change to one of the BBC’s UK Public Services, the Trust must have regard to the four considerations set out in Clause 25 of the Agreement. These are:

- the impact on users and other relevant parties
- financial implications
- novelty
- duration

The Trust considers a proposal against each of these factors before reaching a view based on their combined effect. We consider each of these areas both in terms of their impact on the individual service as well as any potential cumulative impact.

The Trust recognises its responsibility to undertake a PVT where there is evidence that a proposal constitutes a significant change to the BBC’s UK public services, or where a change to a key characteristic of a service licence is proposed. It also recognises,

\(^1\) BBC Framework Agreement between the BBC and the Secretary of State for Culture, Media and Sport July 2006
http://www.bbc.co.uk/bbctrust/assets/files/pdf/about/how_we_govern/agreement.pdf NB The Agreement was amended in March 2010 to to reflect the changes made to UK law as a result of the implementation of the Audio Visual Media Services directive: http://www.bbc.co.uk/bbctrust/assets/files/pdf/about/how_we_govern/agreement_amend.pdf
however, that the requirements set out in Clause 25 of the Agreement provide a necessary filter to ensure that the PVT is reserved for significant changes to the BBC’s UK Public Services.

The Trust is obliged to set out its considerations publicly. That is the key purpose of this document.

Contents of this document

In considering the potential significance of permanent collections for Radio 3, Radio 4 and BBC Four, and whether a PVT should be applied before the plans are approved, we have considered three key questions:

a) Whether the proposals fit with the BBC’s public service remit and its public purposes.

b) Whether the proposals are covered by a current service licence or require variations to any service licences (including variations to any of the key characteristics of those service licences).

c) Whether the proposals represent a significant change to the BBC’s UK Public Services requiring a Public Value Test.
2. Overview of the BBC’s Permanent Collections for BBC Radio 3, BBC Radio 4 and BBC Four

BBC Management summary

Overview

The BBC’s Archive Strategy identified a selected number of existing services and service brands (BBC Four, Radio 4 and Radio 3) through which the BBC’s ‘permanent collection’ of public service content will be delivered. This reflects themes in ‘Putting Quality First’ about the importance of archive and culture in delivering the BBC’s core purposes by connecting audiences to the best of everything that the BBC has ever made. The permanent collection proposals focus on the BBC editorial priority of “Inspiring Knowledge, Music and Culture” and provide programming which is likely to be of low commercial value.

BBC Radio 3

Radio 3’s proposition is based on making available the archive of a small number of programme strands to enhance the user understanding and appreciation of the network’s core output and to enhance the BBC’s offer around classical music in other online propositions such as bbc.co.uk/music and elements of the BBC’s Knowledge proposition. Radio 3’s archive activity will focus on classical music in context; guide to commercial recordings; world music recorded on location; commentary on arts and ideas; and classic theatre and dramatisation of classics.

BBC Radio 4

The Radio 4 offer will provide both topic-based collections and an archive of high-profile strands, with an emphasis on factual content. This archive will be released in such a way as to support BBC Knowledge and search related products as well as the radio product itself. There will be a focus on a number of high-profile strands such as Desert Island Discs and Front Row, while the station will also develop collections in support of big broadcast seasons and events.

BBC Four

The BBC Four “Collection Releases” will support major broadcast seasons and series. Selected new programming would be included for permanent publication alongside complementary archive content (which could include content originally broadcast on other channels, radio, or digitised physical artefacts, as editorially relevant). A small number of selected BBC Four long-form programme strands may also be made available over time (e.g. The Mark Lawson Interviews). The BBC Four collections will provide a unique, culturally valuable historical record and resource over the longer term.
3. The Trust’s decision

Fit with the BBC public service mission and public purposes

The BBC’s mission is to inform, educate and entertain and its main objective is to promote its public purposes which are to:

- sustain citizenship and civil society
- promote education and learning
- stimulate creativity and cultural excellence
- represent the UK, its nations, regions and communities
- bring the UK to the world and the world to the UK
- in promoting its other purposes, to deliver to the public the benefit of emerging technologies.

The BBC promotes its public purposes via a wide range of genres of programming, some of which serve to promote more than one public purpose.

We believe that these proposals fit with the BBC’s public service mission as they are intended to enhance the delivery of BBC’s public purposes and reflect the BBC’s editorial priority of inspiring knowledge, music and culture.

BBC management identified these three services to develop the permanent collections strand of the BBC archive as they believe they share a number of important characteristics. They have *Inspiring Knowledge, Music & Culture* at their heart which reflects the editorial priority of the BBC as set out in the ‘Putting Quality First’ strategy. They also have an editorial track record in archive programming and typically only a small proportion of their content has commercial value.

The analysis that we undertook in our service review shows that Radio 3 and Radio 4 are high-quality and distinctive services. Similarly, when we reviewed BBC Four in 2010, we found that much of its programming is also seen as high-quality and distinctive by its audience. Amongst their audiences, these services contribute strongly to the delivery of the BBC’s public purposes. As the programming that BBC management want to make available is primarily taken from the best of their archives, it will share these traits. We believe, therefore, that if there is more opportunity for licence fee payers to see and hear this programming, the overall delivery of public value can be increased.

In addition, these proposals should enhance the audience experience for each of these services as BBC management intends to develop these permanent collections in support of the linear services. These collections will be linked to high profile programming and activity, as well as broadcast seasons and special events where possible, and should provide a richer overall experience.
**Fit with existing service licence and approvals**

**These proposals will require the amendments to the Radio 3, Radio 4, BBC Four and BBC Online service licences.**

Following the On Demand PVT in 2007, BBC services were restricted to offering only limited amounts of long form content available permanently online. Any expansion of this scope requires approval of the BBC Trust. These proposals require the following service licence amendments and are set out below for each service. The amendments to section 2, the scope of the licence, are changes to a key characteristic of the licence and are therefore presumed to be significant.

**Radio 3**

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<th>Current service licence</th>
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<tr>
<td>2. Scope of this licence (footnote)</td>
<td>1 Radio 3 may also offer content on-demand for an unlimited time period after initial broadcast as part of a permanent collection.</td>
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<tr>
<td>5.2 Promoting education and learning</td>
<td>It should build appreciation of music and culture by offering accessible information, including material helpful to people with little knowledge of classical music. Radio 3 should offer its content in as flexible a way as current technology and rights will permit. New platforms should be exploited to allow the audience to explore broadcast content in greater depth with complementary collections of on-demand content to encourage deeper and broader exploration around selected themes and events.</td>
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# Radio 4

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<th>Current service licence</th>
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<tr>
<td><strong>2. Scope of this licence (footnote)</strong></td>
<td><strong>1. Radio 4 may also offer content on-demand for an unlimited time period after initial broadcast as part of a permanent collection.</strong></td>
</tr>
<tr>
<td>¹ Radio 4 currently offers a limited amount of mainly speech content on-demand for an unlimited time period after initial broadcast. Any expansion of the scope of this requires the approval of the BBC Trust.</td>
<td><strong>5.2 Promoting education and learning</strong></td>
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<td>¹ Radio 4 may also offer content on-demand for an unlimited time period after initial broadcast as part of a permanent collection.</td>
<td>It should seek to deepen and broaden listeners’ understanding through specialist programmes on subjects such as politics, business, law, finance, health, education, food and farming, international affairs, religion, ethics, travel and gardening. There should be regular exploration of the sciences, including natural history and medicine. History should be explored through biographical programmes, longer narrative series and one-off features and documentaries. Radio 4 may also create complementary collections of on-demand content that encourages deeper and broader exploration around selected themes and events.</td>
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# BBC Four

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<td><strong>2. Scope of this licence (footnote)</strong></td>
<td><strong>3. This includes the offer of some news and current affairs output on-demand for an unlimited time period after initial broadcast. Any expansion of this offering will require the approval of the BBC Trust.</strong></td>
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<td>³ This includes the offer of some news and current affairs output on-demand for an unlimited time period after initial broadcast. It may also offer programming including archive, for an unlimited time period after initial broadcast as part of a permanent collection of on-demand content.</td>
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**BBC Online**

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<th>Current service licence</th>
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<td>3. Overview of aims and objectives (footnote)</td>
<td>4 Any significant expansion of the scope of audio and video archive availability online requires the approval of the BBC Trust. Specific exceptions are permitted for Radio 3, Radio 4 and BBC Four to develop a permanent collection archive of on demand content.</td>
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**Significance of the BBC’s plans**

Taking the four criteria (impact, financial implications, novelty and duration) into account, and applying the rebuttable presumption that changes to key characteristics of a service call for a public value test, we have decided that BBC management’s proposals for permanent collections do not constitute a significant change to the BBC’s UK public services, either on an individual or cumulative basis. Therefore, we have concluded that these proposals do not require a public value test before approval.

While these proposals are intended to be permanent we do not believe that they are significant in regards to any other criteria as set out below. Our assessment shows that these proposals should have no significant audience impact and we have not identified any areas of significant market impact.

**i) Impact**

Our assessment of these proposals suggests that, while they will deliver increased public value amongst those audiences that use the permanent collections, there will not be a major audience impact on these services overall. We also consider that any market impact would be very negligible.

**Impact on audiences**

Our assessment suggests that these proposals will deliver increased public value amongst those audiences that use these permanent collections, and that they will complement and support the linear experience. However, given the scale of these proposals and the projected levels of usage, there is unlikely to be a major impact on the overall audience resulting from the proposed changes to Radio 3, Radio 4 and BBC Four.
Radio 3 and Radio 4

Our analysis shows that Radio 4 has the highest levels of on demand listening of any BBC radio station. In the first quarter of 2010 there were over 700,000 weekly requests for Radio 4 programmes. In contrast, Radio 3 has only around 71,000 weekly requests over the same time period.²

BBC management estimated the potential impact on levels of listening to Radio 3 and Radio 4 resulting from these proposed increase in hours of archive content. In their estimation, they assumed that every request to a programme was listened to in full and they modelled their analysis on the data from a number of archive programmes that had already been made available for streaming and download.

This analysis found that, as a proportion of overall listening, the increases in Radio 3 listening hours would be likely to be no more than a maximum of 0.26% via streaming and 0.05% via downloads. The increases in Radio 4 listening hours would be a maximum of 0.07% via streaming and 0.02% via downloads.³

We believe that this is a fair analysis and indicates that the overall impact of these proposals on Radio 3 and Radio 4 audiences would be very small. Even though we note that these permanent collections will complement and support linear programming and broadcast seasons, which should help increase awareness and usage, we still expect the impact on levels of listening to be very small overall.

Evidence gathered in our service review indicates that for both Radio 3 and Radio 4, audiences see the online provision of content as a low priority in comparison with the linear broadcast. This low priority overall suggests that there is unlikely to be any major impact on audience behaviour. However, where audiences do use these aspects of the service, they are generally positive about them and value these opportunities to listen in different ways. We believe, therefore, that these proposals will result in increased public value when audiences utilise the permanent collections.

BBC Four

Our analysis shows that in 2009-10, BBC Four programmes attracted an average of around 700,000 requests per week for streaming and download via the BBC iPlayer.⁴ While this is a very small proportion of all iPlayer requests, BBC Four attracts a relatively higher proportion of on demand consumption than BBC One and BBC Two.

The permanent collections for BBC Four will be in support of linear broadcast seasons. Therefore, it is likely that there would be a peak in the number of requests for content during these seasons, as the permanent collections should benefit significantly from the ability to cross-promote from the linear broadcasts.

In their proposals, BBC management estimate the potential uplift of this effect. They use the impact of linear promotion of BBC iPlayer on actual BBC iPlayer usage as an indicator of potential increase. This suggests that the uplift in requests for BBC Four content could increase from around 10% to 20% during these seasons. Therefore, this could equate to up to 140,000 additional requests per week.

² Source: BBC iStats
³ Source: BBC management’s proposals for permanent collections
⁴ Source: BBC iStats
These additional requests would only take place during the 3 to 5 seasons per year that BBC management plan to build the permanent collections around. This low level of volume and activity will limit the overall audience impact of these proposals. In addition, evidence shows that online viewing is additive rather than substitutive meaning that these proposals are likely to enhance the experience of those audiences who use these permanent collections but not detract from usage of linear broadcast services. In comparison with BBC Four’s overall level of consumption, the additional requests for online content resulting from these proposals is very small.

On the basis, we do not believe that the impact on audiences will be large.

**Cumulative audience impact**

We note that the permanent collections for these services will be primarily located separately on the relevant service websites. There is no evidence to suggest that TV and radio online consumption are substitutes for each other. Therefore, we do not believe there is any cumulative audience impact as a result of these proposals.

**Impact on the market**

Our assessment has not identified any areas of market impact relating to these proposals.

**Radio 3 and Radio 4**

In providing evidence for these proposals, BBC management has conducted assessments of the market impact for the permanent collections on Radio 3 and Radio 4.

For Radio 3, they concluded that:

- The nature of the content which is likely to be made available, namely high-quality music and speech audio content of cultural value, is not generally offered by other providers in the market;
- Full-track classical music (in copyright) will not be made available in the archived content – only short clips of music will be;
- Only limited amounts of full-track commercial music would be made available in Radio 3’s world music and jazz streamed archive;
- There is little full-programme content broadcast on Radio 3 which has demonstrable and significant commercial value, and the BBC has well established procedures for identifying and exploiting such content; and
- Chapterisation of content will allow consumers to navigate easily between segments of speech content, but not to navigate easily between clips of music, and won’t allow consumers to locate specific music content on a standing basis.

For Radio 4, they concluded that:

- The nature of the content which is likely to be made available, namely high-quality speech-based audio content, is not offered by other providers in the market; and
- The content offer will be limited to that with low commercial value.
We believe that these are generally fair and accurate assessments of the market impact of their proposals.

BBC management assert that only a limited amount of full track jazz and world music would be made available in the permanent collections but that it is unlikely that programming containing such music would be viewed as a credible substitute to CDs, digital downloads or similar linear programming on other broadcast outlets. However, we are aware that the jazz and world music markets are substantially smaller than the classical music market, and there are a number of on demand providers of this content, such as Jazz FM. According to a report on the Value of Jazz in Britain\(^5\), the majority of revenue in that sector comes from CD sales, PPL fees and ticket sales. We consider that the small amount of this programming made available by these proposals, along with the fact that it will be for streaming only and not for download, will mitigate any impact on these sources of revenue. In fact, there may be some positive impact on CD and ticket sales due to audiences sampling this content.

Radio 4’s permanent collection offer may also impact on other speech based media providers. UK publishers sold an estimated 763m books in 2009, with an invoiced value of £3,053m according to the PA Statistics Yearbook 2009. The digital element of the book industry is changing rapidly as a result of developments in digital technology, particularly e-readers, such as the Kindle, and tablet computers, such as the iPad. Sales of ebooks outstripped audiobooks for the first time in 2009. However, total UK publisher sales in the digital sector stood at just over £150m for 2009. Sales of audiobook downloads from participating companies were £1.5m in 2009, up 72% from 2008.

However, the scale of the proposed changes and likely audience uptake suggests that the impact will be very marginal when compared with the size of this market. In addition, these proposals will focus on programming with little or no commercial value and which primarily involves knowledge, culture and arts content – areas which are less well served by the commercial market.

**BBC Four**

In presenting their proposals for the BBC Four permanent collections, BBC management identified a number of areas where there could be potential market impact. These include suppliers of free (at point of use) and paid-for internet catch up and VOD services, DVD rentals and sales, and suppliers of online archive programmes.

However, their analysis suggests that any negative impact will be relatively low as:

- The permanent collections will comprise low volumes of predominantly non-commercial content.
- Any increase in the number of viewing requests will be modest.
- Few of BBC Four’s competitors offer VOD services – either on a free or paid for basis.
- Any adverse impact on DVD sales and rentals is likely to be small – British Video Association research suggests the correlation between consumption of television on catch up services and sales of TV DVD box sets is positive rather than

negative. Furthermore, making content available via streaming does not preclude simultaneous commercial release for download to own.

- There are relatively few legal commercial suppliers of archive programming.

We broadly agree with this analysis. Overall, we believe that the market impact will be limited by the low volumes of content made available and the low levels of audience usage.

However, we do not agree that few of BBC Four’s competitors offer VOD services. Both BBC Four’s key competitors – More 4 and Sky Arts – offer some programmes through VOD catch up services. However, the low audience uptake identified above suggests that the impact on these services will be negligible.

We also note that this is a relatively nascent market and one where technology advances can quickly change audience behaviours. To mitigate potential changes in the market, we believe that the limited scope of these proposals – to focus primarily on knowledge culture and arts – will give the market a strong degree of assurance as to the scope of BBC’s planned activity. We also welcome BBC management’s engagement with a number of relevant stakeholders during their development of these proposals, and expect this to continue. In addition, the BBC’s fair trading regime is required to monitor market developments and consider whether impact may increase over time.

**Cumulative impact**

As these permanent collections will be accessed through BBC online, there is the potential for this content to lead to an uplift in demand on IP networks and internet service providers. However, given the expected relatively low take up of the permanent collections content, we do not anticipate there to be any major peaks in usage of non-broadcast content. On this basis, we do not think there will be a major impact on these providers from this offering.

**ii) Financial Implications**

The financial implications of these proposals are small.

Although it is hard to estimate final costs, BBC management expect that the costs for these proposals will be negligible and will be contained within the existing service licence budgets for each service. Expenditure will primarily relate to rights, digitisation and publishing costs.

On this basis we believe that the financial implications of these proposals are small, both on an individual and cumulative basis.

**iii) Novel**

The permanent collections for Radio 3 and Radio 4 are not novel. However, although there is some long form video content available on the BBC website, creating a BBC Four permanent collection archive is novel.

Both Radio 3 and Radio 4 currently make some archive programming available permanently on their website:
• Radio 3 currently has around 220 hours of archive programming available and this is accruing at the rate of around 80 hours a year. BBC management would like to make approximately 420 hours of additional content available a year.

• Radio 4 has around 12,000 hours of archive programming available and this is accruing at the rate of around 3,000 hours a year. BBC management would like to make approximately 1,000 hours of additional content available a year.

As these figures indicate, although the proposals for Radio 3 and Radio 4 seek to increase the scale of the archive collections, they do not represent a novel activity.

The permanent collections on BBC Four can be considered novel as there is currently no permanent archive content curated on the BBC Four website. However, there is some precedent as a selection of long form video content is made available on the BBC website under the /archive site. There are approximately 200 hours of long form TV content available through this portal. In addition, some news and current affairs programming is also available permanently on the BBC website and over 5,000 hours of Parliamentary output is available permanently via Democracy Live on BBC Online.

Therefore, while this proposal does represent new activity specifically for BBC Four, the proposals will not involve the BBC in an overall new area of activity.

**iv) Duration**

**These proposals are intended to be ongoing.**

The proposals outlined in this document are permanent and ongoing.