

S4C'S RESPONSE TO: Digital Britain: The Interim Report dated January 2009 ("the Interim Report")

SUSTAINING PLURALITY IN NEWS PROVISION IN WALES – THE S4C NEWS PILOT

1. Introduction

- 1.1 In the Final Statement and Recommendations published in January 2009, Ofcom signalled its support for S4C to redefine the public service landscape in Wales and to make a greater contribution to plurality in Wales. In addition, the Digital Britain Interim Report stated that Government would work with S4C to establish whether or not a pilot project could be launched in Wales for the provision of an English language news service ("the News Pilot"). S4C has welcomed these endorsements.
- 1.2 We believe that the contribution we have made to date has been a proportionate response to the scale and severity of the issues facing public service broadcasting ("PSB").
- 1.3 In this response, we focus on the sustainability and plurality of provision of news in the Nations and Regions, and, how S4C can deliver a new and imaginative plan of action for the future.
- 1.4 Our initial proposals, first submitted to Ofcom in December 2008¹, introduced a new mechanism for securing an English language news service outside the BBC. Issues relating to plurality in English language news provision were extended to encompass Welsh language news and are consistent with the Strategic Partnership Agreement between the S4C Authority and BBC Trust².
- 1.5 In accepting the opportunity to develop the News Pilot we will focus on the immediate issue of English language broadcast news provision. We will ensure that the ability to evolve the pilot into a truly open and digital model is in-built.

2. A snapshot of the proposed News Pilot

- 2.1 With the approval of the Government, the S4C Authority would be responsible for a News Pilot in Wales with the aim of establishing a new way of delivering plurality outside the BBC. In addition, the News Pilot could help inform the development of sustainable frameworks in the other Nations and Regions of the UK.
- 2.2 A news provider(s) would be appointed by a new S4C company by means of an open and contestable tender process³. The S4C company would be responsible for delivering and managing the tender, the appointment of the news provider, and, for the subsequent contract. The news service would be broadcast on ITV Wales. In addition the S4C company would be responsible for securing appropriate distribution of the news service(s) across all digital media, with particular emphasis on broadband.

¹ S4C response dated 04.12.09 and attached at Annex (redacted publication version)

² Strategic Partnership Agreement dated 17.10.2006 -

http://www.bbc.co.uk/bbctrust/assets/files/pdf/regulatory_framework/other_activities/s4c_strategic_partnership.pdf

³ See paragraph 7.2 below

- 2.3 The S4C Authority would be the recipient of additional public funding requirements and would operate in accordance with legal requirements. The S4C Authority would perform the same independent and accountability functions in relation to the new S4C company as it does in respect of S4C and S4C commercial companies.

3. Development Work

- 3.1 The Government's idea of a News Pilot project followed our initial response to Ofcom's PSB Review in December 2008. In conjunction with the Department of Culture, Media and Sport we are currently identifying all necessary steps and issues, following which a detailed blueprint will emerge.
- 3.2 Following the approval of the blueprint the S4C Authority would require approval from the Secretary of State to implement the News Pilot. Any such approval, if provided, would set out a clear, defined and limited public service remit.

4. Delivering Contestability

- 4.1 The S4C company would tender and manage a contract for a third party to produce an impartial news service(s) which would meet the purposes and characteristics of public service broadcasting. Our response to Ofcom's PSB Review provided a more detailed illustration of the suggested tender and contract terms. In respect of the News Pilot the tender would relate to the provision of an English language news service for broadcast on ITV Wales.
- 4.2 The tender would be open to any organisation(s) or consortia of organisations that could demonstrate the ability to meet the key terms including the delivery of plurality. During the development period a detailed tender document and timetable will be prepared.

5. Reach and Impact/What audiences want

- 5.1 It is crucial to keep in mind that at the heart of this proposal is the evidence that audiences in Wales (and beyond) value plurality in the provision of their news. This concern is particularly pronounced in Wales and the other Nations. Audiences will be best served by securing maximum reach and impact which for the time being means that the new service be broadcast on ITV Wales. The proposal would serve to sustain a news service which is highly valued by viewers and would meet all necessary regulatory and compliance requirements.
- 5.2 We are confident, following discussions with ITV, that we can work in partnership to ensure that the benefits of ITV's historical strength as a Nations and Regions news broadcaster is retained for audiences. During the development period the exact nature of the partnership with ITV will be agreed.
- 5.3 In the longer term, as and when audiences' requirements change, distribution could also be made wholly open and/or contestable.
- 5.4 A progressive and open rights ownership model would be developed with a view to sustaining and promoting other forms of local journalism. A plan to promote skills and training would also be developed.

6. Sustainability

- 6.1 Some additional independent public funding will be required for the S4C Authority to deliver the News Pilot. During the development period we will establish a budget and detailed funding plan for the News Pilot.

6.2 The proposal will be focused on delivering cost effective and sustainable news provision with the efficiencies to be found through contestability and by taking advantage of S4C's institutional strengths and expertise in maintaining low overhead spend. Details of S4C's institutional strengths can be found in our response to Ofcom's PSB Review⁴.

6.3 There will be no subsidy of English language services from S4C's grant in aid.

7. Accountability

7.1 Responses to Ofcom's PSB Review highlighted a significant interest, in respect of news services for Wales, in a funding agency based in Wales and a preference within Wales for a structure with a separate licence for each nation. It was felt that it would provide greater sustainability, contestability and accountability. The S4C Authority as an established independent broadcasting authority is capable of delivering comfort in relation to each of those concerns.

7.2 Subject to approval it is likely that the S4C Authority would set up a subsidiary commercial company to manage the News Pilot. A strong and representative Board (appointed by the S4C Authority) would be responsible for day-to-day operational matters with the same accountability to the S4C Authority as has the Board of Directors of S4C. During the development period we will work on the best way to make the constitution fit for purpose.

7.3 S4C's response to Ofcom's PSB Review, sets out in more details the current accountability arrangements for S4C⁵.

7.4 ITV would remain accountable for the content of its broadcast in the same way as S4C is responsible for the content of all of its broadcasts (including by way of example Channel 4 and BBC Wales programmes). For so long as the services were carried on ITV there would be appropriate arrangements between S4C and ITV in relation to editorial and other matters. We would expect it to be a partnership in the truest sense with the arrangements recognising ITV's position as the broadcaster and S4C's position as the awarding body. During the development period the exact nature of the partnership with ITV would be finalised.

8. Timetable

The identification of issues relating to the News Pilot is underway with the intention of being in a position to deliver developed proposals by Summer 2009.

⁴ See footnote 1 above

⁵ See footnote 1 above

Annex



**S4C'S RESPONSE TO: OFCOM'S SECOND PUBLIC SERVICE BROADCASTING REVIEW-
PHASE TWO: PREPARING FOR THE DIGITAL FUTURE ("the Report")**

This is a copy of S4C's response to Ofcom's Second Public Service Broadcasting Review.

Please note that certain paragraphs have been redacted from the document. These paragraphs contain information that is caught by the exemptions in section 36 (effective conduct of public affairs) and section 43 (commercial interests) of the Freedom of Information Act 2000. The redactions are marked with [—.....].

1. INTRODUCTION

- 1.1 Our response to “Phase 1: The Digital Opportunity”, stated that of the models proposed by Ofcom (for the provision of public service content), S4C favoured Model 3, coupled with a tailor made solution to meet Wales' specific requirements. In addition the response to Phase 1 signalled our desire to contribute further to the debate.
- 1.2 In view of the widespread support for the continuation of S4C in delivering public service purposes and characteristics and the recognition of our strategic and institutional importance in Wales, we are ready to make a new and significant contribution.
- 1.3 Below we set out our response to some of the questions posed by Ofcom in the Report and propose an alternative framework to contribute towards Digital Britain and redefine the public service landscape in Wales. We have sought to limit our response to section 4-6 of the Report.
- 1.4 Our proposal for Wales represents a refinement of the models presented by Ofcom in the Report. It is intended to marry the unique and significant advantages that S4C can provide with the best of each of the affiliate model and the competitive funding model and direct public funding model (as set out in the Report). Our pragmatic proposal is focused on securing future news provision for Wales and on promoting plurality and citizenship. We believe that this proposal is a long term solution which has the potential to address other genres when and if pressures develop in relation to commercial funding.

2. MODELS PROPOSED BY OFCOM

- 2.1 We agree with the conclusion of the respondents to the Report and Ofcom's view therein that public service provision and funding beyond the BBC is an important part of any future system.
- 2.2 In order to sustain public service content in the UK, we agree with the view that Channel 4 should have an extended remit to innovate and provide distinctive UK content across all platforms.
- 2.3 Our preference is for a refined model 3 in the short to medium term, with the BBC, Channel 4 and S4C being the main recipients of public funding but with competition for funding for services that they are unable to provide sufficiently. Please see paragraph 4 below for our proposals for further refinement of the model for Wales.

3. FUNDING

3.1 Channel 4

We agree, that, in order to sustain public service provision, additional funding will be required for Channel 4. Any extension to its remit should be coupled with additional funding wherever, or, if, that is required.

3.2 Local and Regional News

In our opinion the Report demonstrates that the purposes and characteristics of public service broadcasting in local and regional news will not be met by commercial broadcasters. Sustainability will require direct public funding. [&.....]. This view is based both upon our reading of the responses and research set out in the Report coupled with our own experiences as a mixed funded public service broadcaster.

3.3 S4C Funding

- 3.3.1 It is noteworthy that none of the respondents sought any changes to the current S4C arrangements. We confirm that we are not seeking further funding for delivery of S4C's current public services and remit. Our current creative excellence strategy allows us to deliver our strategic vision within our current funding and statutory structure. We are emphatic that based on our current funding model we can deliver our current public service remit.
- 3.3.2 Looking ahead there are inevitably some issues when assessing the sustainability of our current public services and remit. Inevitably there are some pressure points, which will have to be met by means of judicious business and strategic planning. For example, our 5 year financial planning cycle attempts to utilise our commercial income to sustain our public services. Other risk factors (such as spectrum pricing or, ensuring that in the next BBC Strategic Partnership⁶ period the value of the licence fee contribution plus RPI is retained) may, adversely affect our ability to deliver public services and lead us to seek alternative solutions.

3.4 SERVICES FOR CHILDREN AND YOUNG PEOPLE THROUGHOUT THE UK

3.4.1 Welsh language services for young people

- 3.4.1.1 S4C's new service for young children, "Cyw", was launched in June 2008. Initial reactions in July and August showed a positive reaction to the launch of "Cyw" with it being perceived as a 'good representation of the service' and it has 'improved my opinion of S4C'. It is amongst parents of younger children where "Cyw" has had the most positive impact on perception of S4C. Of those watching "Cyw", the majority felt the service met or exceeded their expectations.
- 3.4.1.2 Having delivered phase 1 of our children's strategy we are now working on phase 2 and 3 of our strategy (delivery for older children). The issues surrounding the continuing coverage of the National Assembly, and the tender for the IPA⁷, must be successfully resolved if we are to move forward with Phase 2. [<.....].

3.4.2 UK wide/English language

- 3.4.2.1 [<.....].
- 3.4.2.2 We note that there have been significant voluntary initiatives from the other public service broadcasters and other broadcasters in relation to provision for Children. Some of these strategies will have an impact on the initial assessment made by Ofcom. Before we develop our UK strategy for children further it is prudent to wait and see how those initiatives develop, and their effect on the market over the next few months.

⁶ See paragraph 4.7

⁷ See paragraph 3.4.2.1.

4. NATIONS AND REGIONS

NEW NEWS SERVICES FOR WALES

4.1 Introduction

4.1.1 S4C's remit is to deliver high quality Welsh language public service content to Wales⁸. Our current funding must remain solely for that purpose. Nothing in the proposal set out below diminishes or undermines that commitment.

4.1.2 Nonetheless, there is more that we can do. Our proposal capitalizes on the institutional strengths of S4C. Crucially, it not only maintains and sustains plurality, but, will improve and provide innovative English language news content for Wales. Our proposal for Wales represents a refinement of the models presented in the Report. It is intended to marry the unique and significant advantages that S4C can provide (see paragraph 4.6) with the best of the affiliate model and the competitive funding model and direct public funding (as set out in the Report).

4.1.3 We do not purport to present a "fits all" model for each of the nations and regions. Our model represents a pragmatic, practical, long term and specific solution to the pressing problems in Wales. We have assessed and are seeking to take advantage of our unique position in Wales to provide both a workable and cost effective solution. Further work will and is being done on the proposal and certain regulatory, financial and legal issues will have to be addressed. We look forward to having an open and constructive discussion with all interested parties.

4.1.4 S4C's Welsh language news provision will continue to be provided by the BBC under the terms of the current Programme Plan (as set out in our Strategic Partnership with the BBC) until the end of 2009⁹. [X.....].

4.2 Proposed Framework for Welsh and English language news content in Wales

We propose the following framework for Welsh and English language news content in Wales:

4.2.1 S4C to be responsible by means of an official legislative instrument for securing English language news within a **clear, defined and limited public service remit**.

4.2.2 No consequential amendments to the remit of S4C's Welsh language services. There is flexibility within the current institutional structure of S4C to make it "**fit for purpose**" to deliver the proposed framework. Any changes would be proportionate and would safeguard the unique culture of S4C as an independent and Welsh language broadcaster.

4.2.3 News services to be **mixed funded** from public and commercial sources (see paragraph 4.4).

4.2.4 S4C to **secure distribution** of said services (see paragraph 4.3). With appropriate television broadcast of the English news service to be included in the Ofcom licence of the **Channel 3** licensee (or other appropriate channel), and to include daily peak time broadcasts¹⁰.

4.2.5 S4C to **tender and manage** a contract [X.....].

4.2.6 [X.....].

⁸ s204 Communications Act 2003.

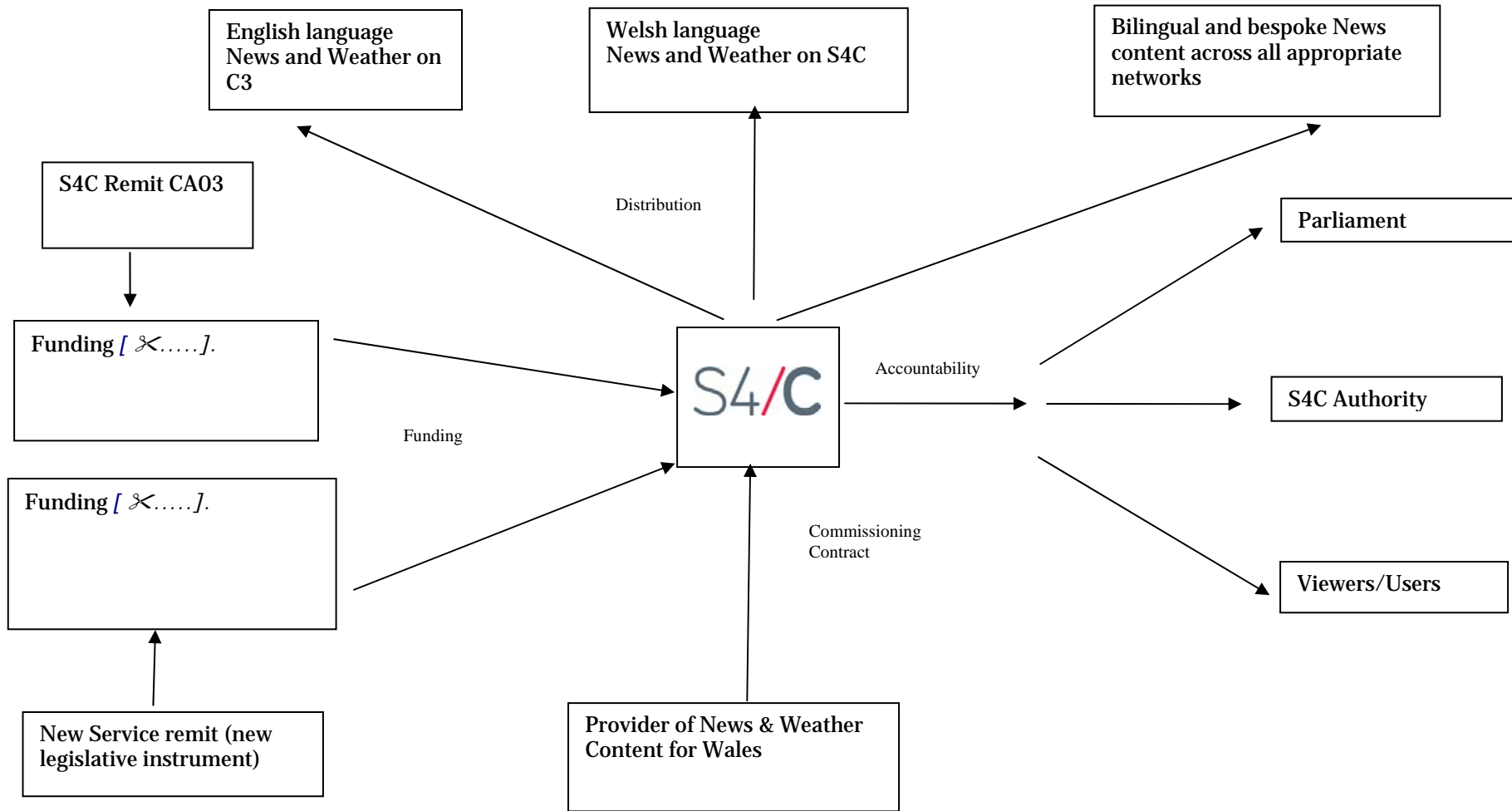
⁹ BBC supplies programming to S4C under the terms of s58(1) Broadcasting Act 1990 and Strategic Partnership BBC Trust and S4C Authority dated 17.10.2006.

¹⁰ In the first instance we envisage the remit to be limited to news, weather and sports reporting but it could be extended to include other matters (if required).

- 4.2.6.1 Subject to any legal and regulatory matters, tender to be contestable and **open to all** (including consortia of news providers). [~~.....~~].
- 4.2.6.2. Process to be wholly **transparent and contestable** and in line with S4C Procurement Policy, Fair Trading Policy, Code of Practice, Terms of Trade and a bespoke Training and Skills Policy to be developed specifically for this contract in line with S4C's innovative training framework¹¹.
- 4.2.6.3 The framework of the contract will aim to safeguard public funds whilst furthering creative excellence. It will be a medium to long term contract. It should allow for the **creation of a sustainable infrastructure and a hub** for the creation of news for Wales. It should enable consequential long term, creative, technical and commercial opportunities for the providers (which in turn should deliver cost benefits).
- 4.2.6.4 [~~.....~~].

¹¹ See paragraph 4.6.6 below for details.

New News Service for Wales



4.3 **Distribution**

- 4.3.1 As a minimum the Welsh language news content to be broadcast on **S4C** television and network services.
- 4.3.2 The English Language news content to be broadcast on an appropriate Ofcom licensed television service. Ideally **Channel 3 in Wales**. We would welcome further discussion, and perhaps research, on securing the most appropriate television distribution of the English language service. It appears clear that broadcast on Channel 3 will, in the short to medium term, deliver the maximum reach and impact. Broadcast thereon is also most closely aligned with the views of respondents and to historical and demographic viewing patterns in Wales (as highlighted by the further research in the Report). [✂.....].
- 4.3.3 The content to be produced to work across all **appropriate networks** and devices. S4C to ensure the news content is distributed (whether through partnerships or otherwise) to maximize public benefit and to provide plurality across all of the most appropriate networks. Both services to be delivered via broadband and other appropriate distribution networks (including radio if appropriate). To include a bespoke all Wales Welsh and English language broadband news service.
- 4.3.4 We would anticipate the need to make these services available in **High Definition**.

4.4 **Funding**

- 4.4.1 [✂.....]. The funding and infrastructure for Welsh language content to be ringfenced.
- 4.4.2 The costs of the English language services to be funded from any **commercial income** deriving from the content coupled with **direct public funding**.
- 4.4.3 [✂.....].
- 4.4.4 [✂.....].
- 4.4.5 [✂.....].
- 4.4.6 We are working to ascertain the **budget and required funding** for the proposal. [✂.....].

4.5 **Accountability**

- 4.5.1 S4C content is currently regulated by the S4C Authority and Ofcom.
- 4.5.2 As is currently the case with S4C, **transparent accounting and reporting structures** (including reporting to Parliament) to be adopted to safeguard public monies and to avoid any subsidies.
- 4.5.3 There should be a memorandum of understanding between the grantor of the direct funding and S4C's **Accounting Officer**. The accounting officer to be responsible for proper application of public monies and achieving **value for money**.
- 4.5.4 The S4C Authority and Ofcom to utilize and tailor S4C's well established governance and accountability structures to ensure that S4C performs its functions and is **accountable for delivery** of the English language services in accordance with the appropriate statutory instrument and with performance measurements and other applicable criteria agreed with Ofcom.

- 4.5.5 A strong S4C Authority and S4C Board of Directors to continue to have a robust arm's length relationship with both the UK Parliament and the Welsh Assembly Government to continue to safeguard **editorial independence** of the news content.
- 4.5.6 **Appropriate measurements** will have to be adopted to accurately measure success against the purposes and characteristics of public service content. It is clear from the current situation that reach and impact alone cannot be appropriate as sole measurements of public service content.
- 4.6 **A snapshot of the relevant institutional strengths of S4C**
- 4.6.1 As an established non departmental public body with a considerable **track record** of broadcasting public service content in Wales all of the skills and leadership required to deliver the services are imbued within S4C.
- 4.6.2 We can harness our institutional strengths to deliver both tangible and intangible results in a **sustainable** environment. We have the **scale and organizational capability** to deliver the proposed framework.
- 4.6.3 The **independence** of the S4C Authority serves to protect the services from **editorial interference**. S4C has an independent body to monitor compliance with relevant codes and the law and has experience of broadcasting news content to standards and quotas set by Ofcom¹².
- 4.6.4 S4C has successful and transparent accounting and reporting structures and is **accountable** for its content and its financial propriety. S4C provides an annual report to Parliament on its activities and spending. There is a memorandum of understanding between S4C's accounting officer and the funding department.
- 4.6.5 S4C operates with a **clear, defined and limited public service remit**.
- 4.6.6 Our **contestable framework** allows the best of new and/or existing providers and technology to enter the market. As a commissioner of original UK content we have a sustainable, transparent and contestable framework for purchasing, contracting and overseeing original content from independent providers and delivering on creative excellence. Our Procurement Policy <http://www.s4c.co.uk/tendrau/downloads/S4C-procurement-policy-statement.pdf> and Fair Trading Policy http://www.s4c.co.uk/abouts4c/authority/pdf/fair_trading_policy_s4c.pdf and Terms of Trade http://www.s4c.co.uk/production/downloads/guidelines/terms_of_trade_second_edition.pdf ensure that we have a transparent and effective system for tendering and contracting suppliers.
- 4.6.7 As a broadcaster we have the **editorial and professional expertise, the technical capability** and the **strategic vision** required to deliver original and innovative news services across the digital networks (see our response to phase 1 - the digital opportunity for further details of our commissioning of original UK content).

¹² Further details of role of the Authority can be found at http://www.s4c.co.uk/abouts4c/authority/pdf/rol_awdurdod.pdf

- 4.6.8 Our marketing expertise including the strong and trusted **S4C brand**¹³ and cross promotion across channels and other media and platforms will provide benefits to the service. Research shows that we and our brand S4C is trusted by the public as a broadcaster. S4C rates better than or on par with all other channels in Wales among Welsh speaking viewers in research about trust in Television channels. When asked to name "A channel I trust", 45% name S4C¹⁴.
- 4.6.9 Our research department has extensive experience of **delivering and measuring** public value that goes beyond reach and impact. Although reach and impact will be appropriate measures, they can never be the sole measurements for success or public value of public service content. If it were thus the commercial sector would most likely be delivering those exact same services. The S4C Authority receives regular research information to allow it to review performance on an informed basis. The S4C Authority is under a statutory duty to consult its viewers and ascertain state of public opinion¹⁵.
- 4.6.10 Our **culture** is imbued with the requirements of a mixed funded company coupled with the incentive to deliver public service content in Wales.
- 4.6.11 As commissioners and editors of content we have the requisite editorial expertise in all genres (including news and current affairs) required to maintain **editorial control** over content.
- 4.6.12 As a broadcaster in Wales we have experience of delivering to the whole of Wales and reaching some of the more **difficult to reach and diverse audiences**. We are proud of our track record in reaching rural, local and community audiences as well as providing extensive services for those learning Welsh.
- 4.6.12.1 Among Welsh speaking viewers of the channel, S4C is perceived to be the strongest performing channel in relation to providing the best music, sports, and documentaries from Wales and Wales-based events. S4C is also now the highest rating channel regarding the opinion that it has the strongest commitment to children's programming. It is seen as representing Rural Welsh life and Modern Welsh Life better than any other channel, and this opinion has risen significantly over the past twelve months (from 75% to 89% and 67% and 79% respectively). Non Welsh speakers have similarly positive attitudes when comparing S4C to other channels¹⁶.
- 4.6.12.2 Our credentials also include our innovative **access services**. For example, we are the only broadcaster providing dual language subtitling and signing online and we are actively promoting Media Literacy as a signatory of the Media Literacy Charter.
- 4.6.12.3 Our out sourced call centre in North Wales allows us to **engage directly** with our audience and provides a direct relationship with our viewers.

¹³ Promax UK Awards 2007 – Best Design: Gold Award - S4C Icons (S4C/Proud Creative)
 Promax UK Awards 2007 – Silver Award – Schools Loop (S4C/Proud Creative)
 Promax UK Awards 2007 – Best On Air Branding: Silver Award – Idents Set 2 – Pier, Buoys, Golf, (S4C/Proud Creative)
 EBU Connect Awards 2007 – Total Package Award in the Design Category – Top Award for S4C's New Branding (S4C/Proud Creative)
 Bilingual Design Awards 2007 (organised by the Welsh Language Board) – S4C won five categories including Welsh Brand Category for S4C's New Brand identity.
 Design Week Awards 2008 – on-screen campaign promoting its bilingual subtitling and video-on-demand services.

¹⁴ SPA Research, CAT project, July 2008

¹⁵ s64 Broadcasting Act 1990

¹⁶ Source - SPA Research, CAT project, July 2008.

- 4.6.13 **Skills development and job retention** in Wales is key to our success. We have developed a training framework that enables us to develop talent at all levels. This framework has been identified by the BTSR as a case study for the UK. The retention and creation of a highly skilled, technology oriented skilled workforce is key to our activities¹⁷.
- 4.6.14 We have consistently delivered **value for money**. Our administrative costs are extremely efficient. The target for overheads and administrative costs is currently 4.5% of all expenditure.
- 4.6.15 As a mixed funded model we have the framework and experience to exploit **commercial airtime** and of scheduling Channel 4's English language content in Wales. We hold extensive **commercial experience** of the broadcasting and content market in Wales and have experience of balancing both public and commercial requirements.
- 4.6.16 We successfully use **partnerships** to deliver our public purposes. Successful and meaningful partnerships include:
- the relationship with the independent sector to produce our content;
 - our progressive rights regime aims to enable the widest possible distribution of our content;
 - the Strategic Partnership between the S4C Authority and the BBC Trust;
 - the relationship with ITV as a content provider in genres including current affairs, drama and factual programming and more recently with ITV Local¹⁸;
 - Channel 4, by scheduling their programmes and our recent successful joint application for Multiplex B Capacity.
- 4.6.17 [✕.....].
- 4.6.18 Our institutional strengths both tangible and intangible allow us the **flexibility** to develop and to provide new services as and when the need arises. For example the recent introduction of our children's service, "Cyw" and our early adoption of web streaming. Our broad remit means that we have experience and flexibility across all **genres**.

4.7 RELATIONSHIP WITH THE BBC

- 4.7.1 BBC Wales has delivered a world class news service to S4C over the past 25 years. We are adamant that our proposal does not diminish our commitment to the strategic partnership with the BBC. [✕.....].
- 4.7.2 [✕.....].
- 4.7.3 [✕.....].

¹⁷ Our activities are directly responsible for 2250 full time jobs in Wales. Source DTZ Economic Impact Report-http://www.s4c.co.uk/abouts4c/corporate/pdf/s4c_economic_report_2007.pdf

¹⁸

1. To enhance the value of the programmes currently offered on S4C, strengthening the public service broadcaster provision;
2. Provide greater plurality in online news provision, in Wales;
3. Generate additional interest in our programmes through the interactive elements of the new service, and offer the potential for new ideas and contributions;
4. To attract the interest of younger audience in the 16 to 24 age group who may use new media as opposed to traditional broadcast media, and may therefore be unaware of what S4C or the **Hacio** current affairs series has to offer;
5. To attract the interest of new viewers who would not normally access Welsh language programme websites or view S4C's services;
6. Maximize the revenue possibilities for S4C International;
7. To promote S4C Digital/Analogue to a new and different audience.