

The way in which media convergence is defined is satisfactory. However, I wonder whether or not this aspect of the examination is necessary. The Law Commission in its New Media Meets News Media Report in 2013 covered many of the issues that have been discussed in the discussion paper. Many of the recommendations made by the Law Commission would sit well in terms of the manner in which regulatory objectives could be achieved.

It is quite clear that some of the regulatory structures need to be adopted to "convergence" although I would go further and suggest that convergence is not really the issue but the very nature of the Digital Paradigm is. If there are to be changes in regulation and policies there needs to be a recognition of the way in which the Digital Paradigm works and the particular qualities that it has that differentiate it from other earlier communications technologies.

Rather than focus upon what is effectively the content layer, a deeper analysis of new communications technologies needs to be undertaken.

Having said that any regulatory structure should be designed to encourage innovation and entrepreneurship and should not stifle creativity and technological development. A light handed system should be employed.

The work programme is not entirely clear at this stage, and it is my view that a much wider consultation process needs to take place.

I would prefer to see, as I have said, a light handed regulatory model employed

The issue of the digital divide is still one that troubles me, not so much for myself but for others who are going to become the new digital poor. Public facilities beyond what is available in libraries should be in place to enable those who cannot afford computers or internet connections to have access to the Internet

David Harvey

Private