



Information Policy & Compliance

bbc.co.uk/foi bbc.co.uk/privacy

Henry Arnold

Via email: request-183472-5d5fc68e@whatdotheyknow.com

9th December 2013

Dear Mr Arnold

Request for Information – RFI20131692

Thank you for your request of 1st November 2013 under the Freedom of Information Act 2000 ('the Act') seeking the following information:

"Please could you tell me How many letter were sent to those without a tv licence in 2012 as well as the cost.

Could you also tell me how much is spent on enforcement officers that check homes to ensure they are not watching tv without a licence"

Please note that "TV Licensing" is a trade mark used by companies contracted by the BBC to administer the collection of television licence fees and enforcement of the television licensing system. The majority of the administration of TV Licensing is contracted to Capita Business Services Ltd ('Capita'). Over-the-counter services are provided by PayPoint plc ('PayPoint') in the UK, and by the Post Office in the Isle of Man and Channel Islands. Marketing and printing services are contracted to Proximity London Ltd. Media services are contracted to Mediaedge:CIA International Limited ("MEC"). The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

I shall address your queries in turn below:

Question 1

Firstly, I should explain that I have interpreted question 1 of your request to refer to mailings sent by TV Licensing to unlicensed addresses. Unlicensed addresses are those not covered by a valid TV Licence, where we have a reason to believe a licence is required, for example, where an expired licence has not been renewed, or a current licence holder has moved out and no other TV Licence has been moved in. TV Licensing have a range of mailings that can be sent to unlicensed addresses, with tailored content and messages that vary depending on the reason for the address being classified as unlicensed.

Please find below the information we hold relevant to this part of your request which provides approximate figures for the number of mailings sent to unlicensed properties each year. I have provided these figures by reference to financial year (since this is the way all our figures are reported):

Financial year 2011/2012 – 21,092,819

Financial year 2012/2013 - 21,554,240

The cost of sending a TV Licensing mailings by post comprises print and fulfilment, which is carried out by Proximity (who sub-contract to Communisis Group); and postal services, which are contracted to UK Mail. I can confirm that we do hold information that we consider relevant to your request, namely costs information in respect of the constituent elements of printing and fulfilment and postage. However, I am withholding this information under section 43(2) of the Act because the release of such pricing information would be likely to prejudice the commercial interests of Proximity and its subcontractor, UK Mail and the BBC.

The release of the information would reveal valuable information about our contractors' and sub-contractors' pricing to their competitors, while they would not be in possession of the same information regarding their competitors. The release of the requested information would therefore be likely to assist such competitors in future negotiations.

I am satisfied in terms of section 2(2) of the Act that in all the circumstances of the case, the public interest in maintaining the exemptions outweighs the public interest in disclosing the information. I have provided further explanation of my consideration of the public interest test in the section 'Why information has been withheld' below.

However, in line with our duty to provide you with reasonable advice and assistance under section 16 of the Act, I can provide you with an average postage cost to post one standard TV Licensing letter (which is defined as a "DL" envelope size or smaller, weighing less than 100 grams, and able to be "mail sorted" to achieve the best rate), over the time period requested. Please see below the average postage cost for one standard TV Licensing letter during the relevant time period:

Financial year 2011/12 - £0.18383

Financial year 2012/13 - £0.2059

Question 2

The recorded information we hold relevant to your request can be found in the attached [Disclosure Document](#) - TV Licensing Costs of Collection 2012-13.

Please note that collection costs cover all aspects of collecting and enforcing the TV Licence fee. We do not group costs information for specific aspects of the service, such as enforcement.

Why information has been withheld

As section 43 is a qualified exemption, I am required by section 2(2) of the Act to assess whether the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

The following factors are in favour of disclosure:

1. that the BBC is using public money effectively; and
2. that the BBC is getting value for money in respect of its use of the licence fee when purchasing goods and services.

However, it is the BBC's contention that given its commercial sensitivity, these objectives will be threatened if the information requested is disclosed.

I consider that the above public interest factors in favour of disclosure are served by the following:

1. The fact that the BBC is subject to a broad range of internal mechanisms, including oversight by the BBC Trust (responsible for commissioning value for money investigations into specific areas of BBC activity (Article 24(2) (i) of the Charter) and the Executive Board (responsible for conducting the BBC's operational affairs in a manner best designed to ensure value for money (Article 38(1) (h) of the Charter).
2. The BBC is required to comply with Ofcom regulations, the fair trading regime and competition law in general.
3. In the interests of transparency and accountability, certain limited information on expenditure is already provided in the BBC's Annual Report and Accounts and the TV Licensing Annual Review.

In addition, the following factors are in favour of withholding the information:

1. That the BBC maintains a strong bargaining position vis-à-vis suppliers during contractual negotiations in order to ensure that the licence fee is spent effectively.
2. That the competitive position of companies in their particular market is not disadvantaged by doing business with the BBC. It would not be in the public interest to disclose sensitive information about the commercial arrangements between particular companies if that information would be likely to be used by competitors to gain a competitive advantage.
3. Releasing the cost of commercial transactions would be likely to adversely affect the BBC's negotiating position in future contractual negotiations with suppliers of this type of service. This would compromise the BBC's ability to achieve value for money for licence fee payers.

In this instance, I consider that the public interest is served by ensuring that the pricing details of the BBC's commercial arrangements are protected. I am therefore satisfied, in terms of section 2(2) of the Act, that in all the circumstances of the case, the public interest in withholding the information outweighs the public interest (outlined above) in disclosing the information.

Appeal Rights

If you are not satisfied that the BBC has complied with the Act in responding to your request you have the right to an internal review by a BBC senior manager or legal adviser. Please contact us at the address above, explaining what you would like us to review under the Act and including your reference number. If you are not satisfied with the internal review, you can appeal to the Information Commissioner. The contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone 01625 545 700 or see <http://www.ico.gov.uk/>.

Kind regards

Rupinder Panesar

Freedom of Information Advisor, TV Licensing Management Team

