

Dame Caroline Dinenage MP
Chair, Culture Media and Sport Committee
House of Commons
London SW1A 0AA

BY EMAIL

10 June 2026

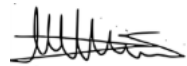
Dear Dame Caroline,

I am grateful to the Committee for inviting me to give evidence, alongside Professor Justin Lewis from the University of Cardiff, on June 2nd.

A couple of issues arose during the evidence session concerning Germany's KEF Commission (Commission for the Determination of the Financial Requirements of Broadcasting Corporations), specifically its appointment process and accountability arrangements, on which I agreed to provide further information in writing. I do so in the attached note.

I hope the Committee finds this supplementary evidence helpful. Should any further information or clarification be of assistance, please do not hesitate to contact me.

Yours sincerely,



Maria Michalis
Professor of Communication Policy
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CULTURE, MEDIA AND SPORT SELECT COMMITTEE INQUIRY – BBC ROYAL CHARTER REVIEW

Professor Maria Michalis, University of Westminster
Supplementary written evidence
June 2026

This Supplementary Evidence relates to Germany's KEF, specifically Questions 134-139 and 144-149 discussed during the Oral Evidence Session of 2 June 2026, 11am to 12 noon.

Context

Germany has a federal constitutional structure. Responsibility for broadcasting and cultural affairs rests with the regional states (*Länder*), not the federal government.

The funding of Germany's Public Service Media (PSM) has traditionally been treated as a technocratic rather than political issue. To this end, the *Kommission zur Ermittlung des Finanzbedarfs der Rundfunkanstalten* (KEF, Commission for the Determination of the Financial Requirements of Broadcasting Corporations) was established in 1975 to determine the level of the former device-specific broadcasting licence fee.

Since 2013, KEF has been responsible for determining the level of the current funding mechanism: the device-neutral household levy.

The introduction of the household levy was intended to reduce evasion, simplify collection, broaden the contribution base, and make the funding scheme future-proof. In the years immediately following its introduction, KEF adopted a cautious approach. Given uncertainty about the number of households and businesses that would ultimately fall within the new system, forecasting revenue proved difficult. Consequently, KEF refrained from immediately recommending changes to the contribution level.¹

KEF: Role and appointments

KEF is an independent expert body responsible for assessing the funding requirements of Germany's PSM organisations (ARD, a network of 9 regional PSM organisations; the national ZDF; and Deutschlandradio) and for recommending the level of the household levy to the regional governments.

KEF serves as an institutional buffer between politicians and PSM funding. This separation is considered a crucial safeguard for broadcasting freedom (*Rundfunkfreiheit*), a principle that enjoys strong constitutional protection in Germany. The purpose of KEF is to ensure that decisions concerning PSM funding are insulated from day-to-day political pressures and party-political interests. In doing so, KEF helps

¹ [KEF 18th report \(2011\)](#) (accessed on June 9, 2026; original in German)

guarantee adequate, proportionate and politically independent funding, thereby protecting PSM editorial independence and organisational autonomy.

KEF is a 16-member expert committee. Each of the 16 Minister-Presidents of the German regional states (Länder) appoints one member for a 5-year term. Reappointment is permitted. The Minister-Presidents coordinate appointments to ensure that the Commission collectively possesses the range of expertise required by law (see below). The Commission elects a Chair and one or two Deputy Chairs from among its members.

Members do not serve as representatives of governments, broadcasters or political parties. Rather, they serve in a personal capacity as independent experts. Collectively, the Commission must possess expertise in the following areas:²

- Three experts in auditing and management consulting;
- Two experts in business administration;
- Two experts in broadcasting law who are qualified to serve as judges;
- Three experts in media economics and media studies;
- One expert in broadcasting technology;
- Five experts in public-sector auditing.

KEF is funded through revenue from the household levy. The regional state hosting the KEF secretariat approves the Commission's draft budget, following consultation with the other regional states.³

How does KEF work

The determination of the household levy follows a three-stage process.⁴

1. *Stage 1: Submission of Funding Requirements:*

The PSM assess their anticipated financial needs and submit funding requests to KEF.

2. *Stage 2: Independent Assessment by KEF:*

KEF evaluates these submissions against the public service remit, the principles of economy and efficiency, and broader economic conditions, including inflation, and makes adjustments as necessary. The Commission is required to

² Interstate Treaty on the Financing of Broadcasting, art 4(4)

<https://www.landesrecht.rlp.de/bsrp/document/jlr-RdFunkFinStVtrRPrahmen> (accessed on June 9, 2026; original in German)

This point has been contributed by Barbara Thomass, Professor Emeritus of International Comparison of Media Systems, Ruhr-University of Bochum, Germany, whose research expertise includes media systems in East and West, media politics, PSM, international communication, media and journalism ethics. Professor Em. Thomass also serves as second deputy head of the administrative council of the ZDF. Responsibility for the interpretation and conclusions presented in this submission remains with the author.

³ Interstate Treaty on the Financing of Broadcasting, art 6

<https://www.landesrecht.rlp.de/bsrp/document/jlr-RdFunkFinStVtrRPrahmen> (accessed on June 9, 2026; original in German)

This point has been contributed by Professor Em. Barbara Thomass (see ff. 2).

⁴ [KEF 25th report \(2026\)](#) (accessed on June 9, 2026; original in German)

consult with the PSM organisations during this process.

Following its assessment, KEF determines the appropriate level of the household levy for the next 4-year funding period and submits a recommendation to the regional governments.

The legal basis for the levy is the Inter-State Treaty on the Financing of Broadcasting. Because all 16 regional governments are parties to this Treaty, any change to the levy requires a corresponding amendment agreed by all.

KEF reports to regional governments every two years. Depending on the stage of the funding cycle, it publishes either an interim report reviewing forecasts, assumptions, and findings, or a contribution report recommending the levy level for the next 4-year period.

KEF reports are adopted by a majority of at least ten members. Members may request that dissenting opinions be included in the published report.⁵

3. *Stage 3: Ratification by Regional Parliaments*

All regional parliaments must ratify the proposed levy level. This requirement reflects Germany's federal constitutional structure.

Regional parliaments may reject KEF's recommendation, but they cannot amend or substitute it with an alternative figure. The federal government plays no role in this process.

Regional parliaments cannot simply disregard KEF's recommendation. Any rejection must be based on narrow constitutionally permissible grounds and supported by publicly stated reasons. Where disagreement relates to funding calculations, KEF must be consulted again because the regional governments themselves lack the authority to determine an alternative levy level.

Any decision to reject KEF's recommendation is subject to judicial review by the Federal Constitutional Court.

A recent example illustrates these constitutional constraints. In 2024, KEF recommended an increase in the levy for the 2025-2028 funding period. Several regional parliaments declined to approve the proposal. In response, the PSM organisations lodged a constitutional complaint with the Federal Constitutional Court. A decision remains pending.

In light of the difficulties associated with securing unanimous approval across all 16 regional states, reforms to the Broadcasting Financing Interstate Treaty are currently under consideration. Under the proposed "objection model" (*Widerspruchsmode*ll), KEF-recommended levy adjustments would take effect automatically unless a specified quorum of the regional states objected. The size of the quorum would vary according to the percentage increase recommended by KEF.

KEF Accountability

KEF accountability rests on transparency, professional expertise, judicial oversight, and the detailed public justification of its decisions. Its legitimacy derives from its role as an

⁵ Interstate Treaty on the Financing of Broadcasting, art 4(2)
<https://www.landesrecht.rlp.de/bsrp/document/jlr-RdFunkFinStVtrRPrahmen> (accessed on June 9, 2026; original in German)

This point has been contributed by Professor Em. Barbara Thomass (see ff. 2).

independent expert body operating within a constitutional framework designed to safeguard broadcasting freedom.

The Commission publishes extensive reports explaining its methodology, assumptions and conclusions. For example, its most recent 25th Interim Report is 363 pages long.

In institutional terms, KEF resembles bodies such as the UK Office for Budget Responsibility more closely than a traditional media regulator. Its authority derives primarily from expertise, transparency and legal constraints.

Collection of the Household Levy and Enforcement (Q139)

Responsibility for collecting and distributing the household levy rests with an independent body, the *Beitragsservice*.⁶ Established in 2013 alongside the introduction of the household levy, the *Beitragsservice* replaced the former unpopular Fee Collection Centre (GEZ). It is a fully-owned subsidiary of the PSM organisations (ARD, ZDF and Deutschlandradio).

The principal enforcement mechanism is the periodic matching of household records against official population registers. This process enables the *Beitragsservice* to identify previously unknown dwellings, changes of address, inconsistencies in the household levy contribution data, and potentially contribution-liable households that are not recorded correctly.

The reform therefore represents a shift from device-based enforcement to household - based administrative verification.

Where a contribution-liable household cannot be linked to an existing account, the household is contacted and, if no clarification is provided, may be automatically registered and brought into the normal collection and enforcement process.

Concluding remarks

More than a decade after the introduction of the household levy, Germany's experience suggests that predictability and stability of funding have been among the reform's main benefits. The model has provided PSM with greater financial centrality, enabling them to adapt to changing patterns of media consumption and invest in digital services, streaming platforms and younger audiences.

German PSM continue to achieve strong audience reach and comparatively high levels of public trust in news.⁷

The role of KEF appears particularly important in sustaining public acceptance of the funding system. By placing funding decisions in the hands of an independent expert

⁶ [Beitragsservice](#), website (accessed on June 9, 2026 – page is in English)

⁷ [ARD & ZDF Media Study 2025](#) (accessed on June 9, 2026; original in German); Behre, J. et al. (June 2025). [Reuters Institute Digital News Report 2025](#)

body, the system seeks to reduce perceptions of political interference. Research indicates that perceived government influence over PSM can reduce willingness to pay.⁸

Finally, Germany's experience shows that compliance under a household levy is achieved primarily through administrative verification rather than investigative enforcement. The maintenance of accurate and comprehensive records has become a central element of the funding system's effectiveness.

⁸ Sehl, A. (2023). [Public service media and public funding: a three-country study of willingness to pay versus perceived dispensability](#). *European Journal of Communication*, 38(6): 608–624, p. 617-618.