

Ofcom logo

Consultation response form

Please complete this form in full and return to costarules@ofcom.org.uk

Quantity and scheduling of television advertising on public service channels – proposals for removing regulation

Self / delete as appropriate)

Confidentiality

We ask for your contact details along with your response so that we can engage with you on this consultation. For further information about how Ofcom handles your personal information and your corresponding rights, see [Ofcom's General Privacy Statement](#).

David Hutchison, Honorary Professor in Media Policy, Glasgow Caledonian University. Responses are not confidential.

None / Whole response / Part of the response (you will need to indicate below which question responses are confidential)

Yes / No

Your response

Historically, it was always argued that the difference between the British and American - and American influenced - systems of broadcasting was that in the latter audiences were sold to advertisers, with programmes as the enticing factor, whereas in the UK system audiences were provided with a

wide range of programming. Even when commercially financed channels were introduced in the UK that was still the case: advertising was used, as was the BBC licence fee, to finance a wide ranging menu that a totally commercial system would not and could not offer.

It is ironic that, since the advent of paid-for streaming services, the US system has actually in some respects shifted to the British model - programmes are sold to audiences but audiences are no longer sold to advertisers.

The current proposal seems to be accepting the logic of greater Americanisation of the British system but an out of date Americanisation, given what the steaming services have done to change the historic American model.

There is also a very practical point: it is very easy in the UK to record a programme, then start viewing it ten minutes in, and to fast forward through the advertising breaks. Should the amount of advertising per hour be increased, then it is inevitable that more of us will adopt this viewing strategy. And that cannot be something which appeals to advertisers. The result might be that advertisers would conclude that they should shift even more of their spend into cyberspace, thus depriving the advertising-financed PSB channels of revenue.

Perhaps what is needed are increased restrictions on advertising on the non-PSB channels so that there is a level playing field between them and the

advertising-financed PSB ones.

Please complete this form in full and return to costarules@ofcom.org.uk