

Consultation response form

Your response

| Question | Your response |
|---|---|
| <p>Question 1: Do you agree with our provisional view that the retention of the stricter rules that apply only to PSB channels is not justified? If not, please explain why.</p> | <p>Make the rules between PSB and non-PSB channels the same; the current stricter restrictions on PSB channels are not justified; times of social change have to be taken into account, especially since viewing via apps and streaming platforms ('catch up') is now widespread & non time/ zone specific. Therefore, the watershed (past 9 pm) for example no longer applies.</p> |
| <p>Question 2: Do you have a preference between the proposals under Option 1 and Option 2? If you do not agree with the proposals under either option, please explain why.</p> | <p>Option 2: make them the same, except for the difference in the number of internal breaks permitted in programmes.</p> |
| <p>Question 3: In the event that we proceed with Option 1 or 2, we suggest a one-year period before implementation. Do you agree? If not, please explain why.</p> | <p>One year period agreed.</p> |

Question 4: Is there any further information you wish to provide regarding changing the stricter rules in COSTA?

30. Since the Costa rules were made in 2014 under the AVMS Directive, since Brexit Ofcom should now be free to make its own subordinate legislation under the Broadcasting Act 2003? Does the Directive therefore still apply – in any case it has since been superseded even if Ofcom still wishes to adhere to past EU legislation? With the use of AI there can now be a more robust approach and more relevant and reliable methods for calculating the scheduled duration and viewer-specific targeting of a programme, including children.