

Your response

About us

1. Directors UK is the professional association of UK screen directors. It is a membership organisation representing the creative, economic, and contractual interests of over 8,000 members — the majority of working TV and film directors in the UK.
2. Directors UK collects and distributes royalty payments and provides a range of services to members including campaigning, commercial negotiations, legal advice, events, training, and career development. Directors UK works closely with fellow organisations around the world to represent directors' rights and concerns, promotes excellence in the craft of direction and champions change to the current landscape to create an equal opportunity industry for all.

Question 1: Do you have any comments on our proposed guidance to the European works requirements?

3. Directors UK welcomes Ofcom's proposed guidance. We agree with Ofcom's interpretation of the European Commission's guidelines on the definition and calculation of share of European works and feel that this is clear and appropriate.
4. In relation to the interpretation of exemptions based on low turnover and low audience, we agree with Ofcom's approach to quantifying this, based on comparable metrics to the European Commission interpretations and guidelines.
5. Like Ofcom, we acknowledge the challenges in devising and assessing metrics in the absence of transparent industry standards for measuring audiences/viewing/share for On Demand Programme Services. We agree that the proposed measures should be kept under review until industry standard metrics become available.
6. The lack of transparent and consistent reporting data for audience viewing, based on a set of industry standard metrics, is one of the biggest challenges in the on demand/digital market. This lack of consistency and transparency is a very real concern for rightsholders and stakeholders in terms of assessing the use of a work, and we would welcome support from Ofcom to work with the industry to develop an agreed set of metrics, which will facilitate consistency of reporting data.
7. We support the implementation of European works guidance as a means of ensuring that European originated works have a strong presence on our screens, it also shows that the UK is firmly committed to implementing a European works regime for On Demand Programme Services (ODPS) that is consistent with that in EU and EEA Member States. We are keen to ensure that UK works remain part of European works quotas going forwards.

Question 2: Do you have any comments on our proposed guidance on the steps Ofcom will take to secure compliance?

8. Directors UK does not have any additional comments and agrees with the proposed guidance regarding securing compliance.

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directors.uk.com