

Title:

Mr

Forename:

Colin

Surname:

Pascoe

Representing:

Organisation

Organisation (if applicable):

Viasat Broadcasting Ltd

Email:

colin.pascoe@viasat.co.uk

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

You may publish my response on receipt

Additional comments:

INFORMATION ABOUT VIASAT

Viasat Broadcasting, with its main offices in London, Chiswick, is the broadcasting division

of Modern Times Group MTG AB, and operates businesses which make it the largest broadcaster of free TV and satellite premium pay TV services in Scandinavia and the Baltics as well as one of the leading broadcasting groups in Europe reaching viewers in 31 countries.

MTG companies currently produce and operate 30 free TV channels and more than 25 pay TV channels which are received throughout Europe with perhaps the best known channels being those broadcast under the TV3 brand. 25 of these channels are operated from the UK and regulated by Ofcom.

MTG also operates the Viasat satellite platforms in Scandinavia and the Baltics and distributes television services via IPTV, mobile phones, the Internet and xDSL.

We do understand the difficulty of deciding such fees for VOD services, having in mind that it is not easy to estimate with certainty the number of services which will be notified. Our preference would be that no fee is charged however any fee that is to be applied to these services in order for them to remain licensed by ATVOD should only be the minimum amount necessary to cover administration of the regulatory process. Please note that many overseas regulators do not charge any fee for the notification of a VOD service. Viasat's management have looked at the fees which are proposed and consider these an unnecessary extra cost.

Question 1: Do you have any comments on our analysis concerning the number of services that are likely to be subject to regulation?). :

Question 2: Do you have any comments on our estimates for regulating ODPS set out in paragraphs 3.23 to 3.29 above?). :

Question 3: Do you agree or disagree with us taking account of the criteria and principles outlined in paragraphs 3.31 and 3.34 above in developing our approach for the 2010-2011 Fees?). :

Question 4: Do you agree or disagree with our assessment of the alternative bases of charging VOD regulatory fees laid out in figure 2 above?). :

Question 5: Do you agree or disagree with our assessment of the alternative attributes laid out in figure 3 above?). :

Question 6a: a) Do you agree or disagree with our analysis above in relation to a minimum payment mechanism?). :

Question 6b: b) Are there are any other bases and attributes for a regulatory fees approach that we have not considered?). :

Question 7: Do you agree or disagree with the approach we have adopted to drawing up options for the 2011-2012 Fees as outlined in Section 3?). :

Question 8a: a) Do you agree or disagree with our preferred approach - Option (C) ? as a means of ensuring an appropriate aggregate contribution to

be recovered by way of fees payable by ODPS in the period 1 April 2010 to 31 March 2011 towards the likely costs of carrying out the relevant functions during the period 19 December 2009 to 31 March 2011? :

Question 8b: b) Do you agree or disagree with either Options (A) or (B) as a means of ensuring an appropriate aggregate contribution, to be recovered by way of fees payable by ODPS in the period 1 April 2010 to 31 March 2011, towards the likely costs of carrying out the relevant functions during the period 19 December 2009 to 31 March 2011? In your response, please give as much detail as possible. In particular please provide the following? :

Question 8c: c) Are there any other options for a regulatory fees approach that we have not considered, that you feel would be appropriate? .:

Question 9: Are there any potential impacts arising from the options we have laid out in Section 4 that we have not considered.? :

Question 10: a) Do our proposals, as outlined in Section 4 concerning possible options for a regulatory fees approach for VOD services have any likely impacts in relation to matters of equality, specifically to gender, disability or ethnicity.? :

Question 10b: b) Are there any other possible equality impacts that we have not considered.? :