

Title:

Mr

Forename:

bill

Surname:

hollis

Representing:

Self

Organisation (if applicable):

Email:

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

Question 1: Do you agree that these proposed regulatory objectives strike an appropriate balance between the duties and other considerations that Ofcom must take account in reviewing advertising regulation? If not, please explain why, and what objectives you would consider more appropriate?:

It is beholding to ofcom to protect us from being swamped with advertising. The document looks as if it has been written with the t.v.companies intrests in the back of their mind. Ofcom are thinking what are the t.c. companies problems, not what are the viewers clear and obvious objections.

Question 2: Do stakeholders agree that the new Code should discontinue detailed genre-specific rules on natural breaks?:

no, The current rules are anyway flouted by some channels.. How irritating is it to have adverts within 8 minutes of a start of a programme.. before the sub titles have finished.. USA style and look what happened to their t.v. My sister lives there and has given up watching t.v its impossible.

Question 3: Do stakeholders agree that the new Code should allow advertising and teleshopping breaks to be signalled in sound or vision or by spatial means, and should drop the requirement for teleshopping segments to be distinguished from programmes by both sound and vision?:

no lets have a clear break between the programme and the adverts. Already they try and merge them.

Question 4: Do stakeholders agree that the new Code should discontinue the requirement for a buffer between advertising and coverage of a religious service or Royal occasion?:

NO surely some things are sacred ?

Question 5: Do stakeholders agree that the rule requiring a 20-minute interval between advertising breaks should be scrapped?:

No, I wish they would stick to it now/- The adverts are intrusive and lengthy. Of course they must make their money, but not at the expense of enjoyment of a programme.

Question 6: Do stakeholders agree that there should be limits on the number of advertising breaks within programmes of a given scheduled duration?:

Yes. once every half an hour would be better than the current 20 minutes..

Question 7: Has Ofcom identified the right options for break frequencies? What issues should Ofcom take into account in formulating proposals for consultation?:

Once every half an hour , with a clear break , and if need be make that a 4 minute break instead of 2 or three minutes. :

Of com should do a more vigorous survey of people, rather than hoping they will find this consultation on the web,. The questions MUST BE neutral ..

Question 8: Do stakeholders agree that the restrictions on advertising in films, documentaries and religious programmes and children's programming should be relaxed to the extent permitted by the AVMS Directive? :

no, there is already too much advertising, It is all very well to say the market will control the amount, BUT if there is more time, then the price will fall as there is a finite amount to spend.

the problem the broadcasters have is the advertisers have many more opportunities other than t.v. to spend their money.

the other part of the market issue is, Advertising breaks are a turn off, literally..

People will move with their feet or their fingers, the main channels will lose customers and therefore the ability to raise funds therefore the inability to deliver good programming.

Question 9: Do stakeholders agree that changes to the rules on advertising breaks in news and children's programmes that must be made to secure compliance with the AVMS Directive should be deferred until December 2009?:

no comment : frankly if the french didnt want to comply with an eu ruling they wouldnt.. so let us decide whats best for us..
A lot of my dutch friends watch the BBC because their programming in europe is so poor.

Question 10: Do stakeholders agree that:

- a. the Code should make clear that advertisements are permitted between schools programmes?
- b. the requirement for a buffer between coverage of a religious service or Royal occasion and advertising should be discontinued?
- c. the rule prohibiting advertising after an epilogue should be discontinued? and
- d. the rule allowing Ofcom to exclude adverts from specified programmes should be discontinued?

:

- a) no.. it shouldnt be allowed.
- b) retain the buffer..
- c) no epilogue means the end..
- d) |Someone has to police the system. It shouldnt be a free for all

Question 11: Do stakeholders agree that the rules limiting the length of individual advertisements on PSB channels should be discontinued?:

I think an advert can be any length providing it doesnt breach the rules, it then gives the opportunity for some FINE advertising to appear..
and from time to time we have some really good adverts that are very worthy pieces of art in their own right.

Question 12: Do stakeholders agree that the new Code should discontinue rules on the length of breaks on PSB channels?:

no the rules should be retained and the length of break should be restricted.

Question 13: Do stakeholders agree that the draft Code should establish the principle that the distinction between advertising and editorial content must be readily recognisable, and set out the means for doing this, but avoid more prescriptive rules?:

yes but have as many restrictive rules as possible.

take some of these daft game shows from millionaire to golden balls... the presenters take great relish in announcing the break just at a critical moment.. how bad is that ? Actually it shows how much the advertisers hate if presenters have to use them to create excitement !!!!

Question 14: Do stakeholders agree that the current arrangements for transferring unused minutage should remain in place, and be applied to Channel 4 in place of the special arrangements in respect of schools programmes?:

no transfer of unused minutes should be allowed, it then distorts programming later .. it is clear if they put a rubbish programme on , then cut down on the advertising only to shift the space into the popular programme.. and make more money.. by selling more time from the rubbish programme hour

Question 15: What views do stakeholders have on the possible approaches to advertising minutage regulation outlined above?:

the time should be restricted from 00.01 to 01.00 x amount of minutes of advertising allowed, per hour PERIOD.

Question 16: What views do stakeholders have on the teleshopping options and preliminary assessment outlined above in relation to non-PSB channels?:

do we have to ? we already have tel shopping channels.. My poor old mum (90) gets caught up with them and pays goodness knows what for a (mostly) a bunch of junk.. very persuasive and intrusive - she doesn't know any better . nothing wrong with an advert saying go to xyz channel for your shopping experience..

Question 17: What views do stakeholders have on the teleshopping options and preliminary assessment outlined above in relation to PSB channels?:

Question IA1: Do you agree with this overview of the impact of the current rules? Do you agree with our starting hypothesis in respect of the extent to which the current rules are likely to impose a constraint on different broadcasters i.e. PSBs and non-PSBs? If not, please set out your reasoning.:

f

Question IA2: Do you agree with the broad assessment of the impact on different stakeholders of changes to the rules on the distribution of TV advertising set out in Part 2? If not, please set out your reasoning.:

Question IA3: Do you consider that our optimisation approach is a reasonable approximation as to how additional advertising minutage would be used by broadcasters in practice? If not, please set out how you would approach this modelling issue and what assumptions you would adopt.:

U shouldn't allow extra minutes.

Question IA4: Do you consider dividing non-PSB channels into the three categories of "sold out", "nearly sold out" and "unsold inventory" reflects the realities of the TV advertising market for non-PSB channels. If not, how would you suggest we approach this issue in modelling terms?:

Question IA5: Do you agree that the assumptions of no drop-off effect is a reasonable assumption to make for the purposes of this modelling exercise? If you disagree, please explain your reasoning and provide data to support any alternative assumptions that you would use.:

Question IA6: Do you consider that this range of scenarios is appropriate? Are there any other types of scenarios that you believe we should explore as part of our modelling work?:

complete sponsorship of a programme.. is that workable.
no other adverts.

Question IA7: Is the modelling of the changes in the volume of commercial impacts/share of commercial impacts for these different scenarios broadly in line with any modelling work you have carried out? If not, we would be interested to understand what results you have obtained in modelling these scenarios.:

Question IA8: To what extent do you think that is reasonable to assume a constant price premium in light of changes to minutage restrictions? If you think that this could be unreasonable, please set out what you think might happen and how that could be modelled.:

if you make the time short in peak programmes, it follows the space will be sold for top dollar..

if they cant cover their costs with their advertising revenue, perhaps their costs are to high and they need a pay cut ! or a wastage cut.. You can not keep asking higher and higher prices for your product.. bear in mind we actually pay for the advertising when we buy products anyway..

Question IA9: To what extent do you think that this approach would be a reasonable modelling approach to adopt?:

Question IA10: To what extent do you think that is reasonable to make use of the elasticity estimates derived from the PwC study? Are they in line with your own views as to the operation of the TV advertising market? If not, please explain your reasoning.:

Question IA11: To what extent is there evidence to support the argument that an increase in advertising minutage could reduce overall advertising expenditure on TV, i.e. that the advertising market is inelastic?:

Question IA12: To what extent do you consider that these estimates of the financial impact of changes to the rules on the amount of advertising minutage provide an indication of the potential overall scale of any changes as well as the distribution of the impact between PSBs and non-PSBs? Are they in line

with your own views as to how the TV advertising market would adjust to such changes? If not, please explain your reasoning.:

Question IA13: The discussion of the modelling approach set out above has focused on the potential impact on different types of broadcasters. To what extent could there be an impact on other stakeholders, particularly media buying agencies and their clients, the advertisers? What is the attitude of these stakeholders to changes in the volume of advertising minutage?:

Question IA14: Do stakeholders agree with the analysis of the impact of these options on non-PSB channels? If not, please set out your reasons, providing evidence to support your analysis wherever possible.:

Question IA15: Do stakeholders agree with our analysis of the impact on PSB channels of these three options? If not, please explain your reasons, providing evidence to support your analysis wherever possible.:

Additional comments:

i cant get into the detail of the advertising biz nis - all I do know is I am switching off programmes , I simply cannot be bothered with some of the advertising and frequency of it.. It has changed and I will go to bbc, which offers good value for the money WE PAY , its not a free service and the itv companies shouldnt just say o the beeb have a captive audience, they need to srive to be as good as the beeb.