

1. Twenty Minute Interval Rule: we fully support the abolition of the 20 minute interval rule. We believe that we our programming teams are best placed to determine the precise scheduling of advertising breaks, having regard to natural breaks occurring in programme narrative and editorial. We agree with Ofcom's observation that retaining a strict interval rule may result in programming (and in particular programming acquired from the United States) being forced into an artificial break pattern which may not reflect a programme's natural break patterns.
2. No Restrictions on Frequency of Advertising Breaks: we believe that broadcasters should be free to determine the number and frequency of advertising breaks. We disagree with the contention that not restricting the number and frequency of advertising breaks would result in broadcasters adopting a break pattern that will inevitably lead to the irritation of viewers. Advertising will continue to be subject to an hourly cap pursuant to TWF/AVMS Directive. But more importantly, the continuing commercial viability of our channels is dependent on our channels maintaining strong viewer ratings and it is absolutely not in our interests to schedule advertising in a manner that would irritate our viewers and imperil our ratings. Additionally, many of our third party programme licences (particularly studio contracts) require that our break scheduling respects the editorial integrity of licensed programmes – and frequent short advertising breaks would arguably infringe such an obligation. Our advertising breaks will always be scheduled in a manner that respects programme integrity and is least likely to cause irritation to our viewers.
3. Advertising Limits for Particular Types of Programming (eg. 45 minute intervals in films): we support the abolition of interval rules for particular types of programming, for the same reasons as set out in point 1 above.