

**Question 1: Do you agree that television broadcasters should be directly responsible for PRS in programmes and also for other forms of communication where viewers seek to interact with programmes? Please explain why.:**

BT Agrees.

**Question 2: If so, do you agree that a variation to television licences would be the most appropriate way of ensuring that broadcasters are responsible for such PRS compliance?:**

BT has no comment to make.

**Question 3: Do you agree that there is a need for broadcasters to obtain independent, third-party verification that they are in fact complying with the draft licence obligations set out in Paragraph 2 of the draft licence variation? If so, which of the options for verification discussed in Section 4 do you think is most appropriate? Are there other appropriate options? Again, please provide reasons.:**

BT agrees and considers that Option 2 seems to be the most appropriate.

**Question 4: Do you have any comments on the draft licence variation set out in Annex 5? Please support your comments with adequate explanation and provide drafting proposals as appropriate.:**

BT has no comment

**Question 5: Do you agree that the draft licence obligations should not be limited to television but should also apply to radio broadcasters? Please provide reasons.:**

BT Agrees.

**Question 6: Which of the options proposed in Section 6 do you believe is most appropriate to ensure separation of advertising from editorial content? Please explain why.:**

BT believes that option 3 is the most appropriate for the reasons outlined in the consultation itself and specifically in Annex 7.

Option 3 allows for the greatest flexibility for the industry and transparency for viewers, not only in respect of existing formats and services but also in respect of potential new Dedicated PTV services that may be introduced, e.g. multi-round, skill based quiz shows. Existing and new formats may require some limited off-screen activity to be commercially viable and option 3 allows for this whilst ensuring that the commercial nature of the content is clear to viewers.

The requirement for labelling is a commercial restriction, however if related rules are applied proportionately and pragmatically, this should not be an overly onerous restriction for legitimate and appealing promotions.

**Question 7: Do you have any comments on the draft new rules and guidance in respect of Options 2, 3 and 4 set out in Annex 6? Please support your comments with adequate explanation and provide drafting proposals as appropriate.:**

As a communications provider BT may be indirectly impacted but believes it is a matter for broadcasters to comment on specific proposals relating to changes to the broadcasting code.

**Question 8: Do you agree that Option 2 clarifies the existing provisions of the Broadcasting Code and therefore should not be limited to dedicated PTV only, but should apply to all editorial content (on both television and radio) which invites viewers to pay to take part? Please give reasons.:**

BT has no comment.

**Question 9: Has Ofcom correctly identified, in Section 6 and the Impact Assessment in Annex 7, the various impacts arising from each option for dedicated PTV? Again, please give reasons.:**

BT believes that the assessments are fair in relation to existing services, however consideration should also be given to the impact the proposals may have on restricting or otherwise new formats, particularly in relation to Dedicated PTV.

**Comments:**