

Teletext Ltd
10 Chiswick Park
566 Chiswick High Road
LONDON
W4 5TS

October 15, 2007

Yvonne Matthews
PTV consultation responses
Ofcom

Teletext Ltd welcomes Ofcom's consultation into Participation TV (PTV), following the much-publicised compliance and editorial failures by some public service broadcasters (PSBs). Teletext agrees that it is essential that PTV regulation is tightened up to restore viewer confidence, while enabling this popular form of interaction to continue.

The PTV services run by Teletext are SMS comment/chat services and SMS-entry based competitions. The comment/chat services allow viewers to text in their thoughts on a variety of topics, they are on air either permanently or for several days, and are updated on a rolling basis. The competitions run for several days or weeks, with no high pressure to end them within a tight timescale or to choose a winner before the competition has ended. We have a direct relationship with the third party technical suppliers of our SMS services, through rolling contracts between ourselves and the aggregator of our SMSs as well as the suppliers of the SMS competition/chat mechanic, ensuring we have a tight control on any technical issues. Teletext staff are also directly involved with competition fulfilment, with winners randomly chosen either by our own editorial staff or our sole competitions supplier, and it is the responsibility of Teletext staff to put all competitions live on air, including their promotion within Teletext services.

The scale of PTV services on Teletext is not vast. We typically have up to 70,000 viewer interactions each month, netting the company monthly revenue of up to £5,000.

While we accept that a licence variation is the right way to tighten existing PTV regulations for PSBs, we believe that the draft licence variations as proposed should not be applied in their entirety to Teletext, which has never had a single PTV complaint upheld. We believe we can distinguish ourselves from other PSBs and are proposing a different licence variation for Teletext.

We accept the proposals in Points 1 and 2 of the Draft licence variation (Annex 5). In Point 3, we also accept the first sentence in Options A, B and C (The Licensee shall implement and maintain appropriate compliance procedures to ensure arrangements for the management of methods of communication published in programmes and intended to allow communication between members of the public and the Licensee fulfil all the requirements set out in paragraph 2 above), as we already have our own robust compliance rules, applied by our long-standing, in-house, compliance team. But we believe there is no need for Teletext to have any form of additional, independent, verification, as we do not run the types of competition or event that these measures are aimed at.

Instead of testing and verifying our compliance procedures by an independent third party on a regular basis, we propose a specific clause for Teletext Ltd requiring us to have our existing compliance procedures verified by Ofcom/BCAP as part of our existing reporting regime and to inform them in advance of any changes to those procedures.

John Sage
Editor-in-Chief
Teletext Ltd