

Question 1: Do you agree with the new proposed procedure? If not, why not? Please suggest any alternative wording where appropriate:

In principle yes. However we feel the turnaround time for the initial response should be increased from seven working days to ten (Para 15), and that the turnaround time for the second response should be increased from five working days to seven. (Para 18)

Question 2: In particular do you believe it is appropriate, in normal cases where a sanction is being considered, for broadcasters to have two opportunities to make representations to Ofcom (once on the seriousness of the case and once on the nature and level of any recommended sanction)?:

Yes: subject to an extension of the response times suggested above.

Question 3: Do you agree that it is appropriate for Ofcom to introduce the new proposed fast-track sanctions procedure in the circumstances suggested?:

Once again we agree in principle, but would welcome an increase in the response time allowed from five working days to ten. (Para 26)

Question 4: Do you have any other proposals for making the procedure more effective and/or appropriate?:

In view of the fact that licensees would have fewer opportunities to respond, we feel it might be appropriate to grant them the right to appeal against any sanction imposed; this appeal to be heard by an independent body separate from Ofcom. In this way, the process would ensure compatibility with the Human Rights Act 1998.

Additional comments: