

## **Curzon**

### **1. Changes to the way Ofcom collect data**

**=> Do we agree with Ofcom's proposed changes to the way they collect data and do we have further comments?**

We don't agree with Ofcom's proposed changes to the way they collect data. Re Table 1: Data submission and publication plan, 30 days is not long enough to collect and compile all that data, especially for the full year of 2016. We believe at least 60 days are necessary to do this. The routine provision of data is quite heavy to ensure for small providers of ODPS like Curzon Home Cinema due to technical obstacles which ultimately boil down to issues of cost and resources. We believe a distinction should be made between the small, medium and large providers of ODPS and those who are also broadcasters.

### **Changes to the type of data OFCOM collect**

**=> Do we agree with Ofcom's proposed changes to the type of data they collect and do we have further comments?**

We don't agree with Ofcom's proposed changes to the type of data they collect. With regards to the significant costs/workload induced to actually make our VOD content accessible and the notable difference, there is between broadcast television and VOD, the ODPS providers who are also broadcasters will be in a much better position to justify making the services accessible than the smaller ones. Amazon and Netflix have other markets to actually support the associated investment of carrying out all three main access services on their platforms. Therefore, the smaller providers will not have the ability to compete on a level playing field and any data published will always show us in an unfavorable light.

### **Changes to the way OFCOM publish data**

**=> Do we agree with Ofcom's proposed changes to the way they publish data, and do we have further comments?**

With regards to the way Ofcom will publish data, we would like this to be discussed in detail before being approved. How small providers will be compared to large media groups is important and can have significant commercial impacts and brand consequences if negative.