

Title:

Forename:

Surname:

Representing:

Self

Organisation (if applicable):

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

Yes

Additional comments:

Question 1: a) Do you consider that the rule in relation to ?adult-sex? material needs to be clarified? b) Do you agree with our proposed amendments to the rule on ?adult-sex? material (Proposed Rule 1.18 to replace Rule 1.24)? c) If you do not agree with our proposed amendments, please explain why and suggest alternative wording where appropriate.:

As a parent I feel very strongly that explicit sexual images should be restricted to those TV channels where users must be adult subscribers. Although there has been a deliberate attempt to blur the distinction between sex education and sex for entertainment in recent years, it is vital as parents we seek to protect under 18s from inappropriate images. Already the moral decline in Television standards, once so effectively upheld in the days of the IBA, has been eroded to the point where almost anything goes. What few safe guards remain should be rigorously enforced.

Question 2: a) Do you consider that the introduction of a new rule in relation to material of a strong sexual nature is appropriate? b) Do you agree with our proposed rule on material of a strong sexual nature (proposed Rule 1.19)? c) If you do not agree with our proposed new rule, please explain why and suggest alternative wording where appropriate.:

Quite simply, I do not support any relaxation of the present rules.

Question 3: a) Do you consider that the rule in relation to material equivalent to the BBFC R-18 rating needs to be separated from the rule in relation to R-18 rated works? b) Do you agree with our proposed rule on material equivalent to the BBFC R-18 rating (proposed Rule 1.17)? c) If you do not agree with our proposed new rule, please explain why and suggest alternative wording where appropriate.:

I strongly disagree with any attempt to admit more graphic sexual content in British broadcasting, especially not before the 9pm watershed where standards have already fallen to the extent that, as a parent, I cannot even feel comfortable watching main stream light entertainment or soap operas without reaching for the remote control !

Question 4: a) Do you consider that the rule in relation to pre-watershed material needs to be clarified? b) Do you agree with our proposed amendments to the rule on pre-watershed material (proposed Rule 1.20 to replace Rule 1.17)? c) If you do not agree with our proposed amendments, please explain why and suggest alternative wording where appropriate.:

Pre watershed broadcasting should be such that any age group can sit together and watch in a relaxed manner. Simply look to the television of 30 years ago to understand this. Although innuendo was common place, it operated on more than 1 level and was usually suitable across the generations. I strongly oppose any relaxation in pre watershed sexualised content.

Question 5: a) Do you consider that the associated revisions are appropriate following the other rule revisions outlined above? b) Do you agree with our proposed associated revisions in Section One? c) If you do not agree with our proposed revisions, please explain why and suggest alternative wording where appropriate.:

I would prefer no revisions at all unless they lead to an improvement in standards

Question 6: a) Do you wish to suggest an alternative approach to the proposed set of rules in relation to sexual material? If so, please outline your proposals, which should comply with relevant legislation (including the Communications Act 2003 and the European Convention on Human Rights).:

I would have thought from the answers given in questions 1 to 5, you would by now have grasped my view point. To put it another way, I do not support a broadcasting system that undermines human dignity for the purposes of entertainment. In my view, reality TV shows a

chief among those that seek to manipulate and undermine the kinds of values (including mutual respect for other human beings and decent behaviour) parents are trying, against the flow, to instil in our children. I would like to see such unimaginative programming replaced with more entertainment with an emphasis on education.

Question 7: a) Do you consider that the introduction of new rules in relation to competitions and voting is appropriate? b) Do you agree with our proposed new rules in relation to competitions and voting (proposed Rules 2.11 to 2.13 to replace Rule 2.11)? c) If you do not agree with our proposed new rules, please explain why and suggest alternative wording where appropriate.:

Yes

Question 8: a) Do you consider that the introduction of new meanings in relation to competitions and voting are appropriate? b) Do you agree with our proposed new meanings in relation to competitions and voting? c) If you do not agree with our proposed new meanings, please explain why and suggest alternative wording where appropriate.:

Yes

Question 9: a) Do you wish to suggest an alternative approach to the proposed set of rules in relation to competitions and voting? If so, please outline your proposals, which should comply with relevant legislation (including the Communications Act 2003, the Audiovisual Media Services Directive, the AVMS Directive (Implementation) Regulations 2009 and Article 10 of the European Convention on Human Rights.:

No

Question 10: a) Do you consider that the rules on commercial television would benefit from being separated from those for radio? b) Do you agree with the introduction of the proposed new Section Nine on commercial references in television programming? c) If you do not agree with the proposed new Section Nine, please explain why and suggest alternative wording where appropriate.:

No comment

Question 11: a) Do you consider that it is appropriate for Ofcom to include the enforceable provisions relating to product and prop placement, replicated from the AVMS Directive (Implementation) Regulations, as rules in the revised Code? b) If you do not consider this to be appropriate, please explain why.:

Yes

Question 12: a) Would you consider that it appropriate for Ofcom to introduce rules that would allow Public Information Programming (as described above)? If so please explain why. If not, please explain why not. b) If Ofcom were to introduce rules in relation to Public Information Programming: i. Are there any potential programmes that you believe could comply with the potential rules but that you consider would be undesirable or arguably not in the public interest? If so, please give details. ii. What impact (e.g. social, economic, equality) do you think the potential rules would have on viewers, the television industry and any other parties? iii. Do you consider that the potential rules would maintain the editorial independence of the broadcaster and provide adequate consumer protection? If not, please explain why. iv. Do you consider that additional or alternative safeguards to those included in the draft potential rules are necessary? If so, please provide details.v. Specifically, should there be any restriction on the type of non-commercial, not-for-profit entities permitted to fund Public Information Programming, and if so, what restrictions? vi. Do you consider it would be appropriate for Ofcom to review these rules two years after their introduction? If not, please explain why.:

I would in principle support more public information programming. The problem is, with the exception of the BBC, television has lost its authority and credibility with the 40 plus audience who recall, particularly where ITV is concerned, regional issues were addressed and contributed to a sense of identity far more effectively than the current banal output does. The regional approach to commercial television broadcasting was far more respectful to the viewer and would engage viewer loyalty far more easily, even within the multi channel era. The current ITV, in terms of content and presentation style, is poor

Question 13: a) Do you consider that the proposed new Section Nine would benefit from the introduction of new meanings? b) Do you agree with our proposed new meanings for Section Nine? c) If you do not agree with our proposed new meanings, please explain why and suggest alternative wording where appropriate.:

No comment

Question 14: a) Do you consider that the introduction of new Principles in relation to Section Nine is appropriate? b) Do you agree with the proposed new Principles for Section Nine? c) If you do not agree with our proposed new Principles, please explain why and suggest alternative wording where appropriate.:

No comment

Question 15: a) Do you consider that the proposed Rules 9.1 to 9.5 are broadly the same, in terms of both scope and intent, of current Rules 10.1, 10.2, 10.3, 10.4 and 10.12? b) If you do not consider the proposed rules are broadly the

same as the current rules in this area, please explain why and suggest alternative wording where appropriate. c) Do you agree with the introduction of the proposed new Rule 9.6? d) If you do not agree with the proposed new Rule 9.6, please explain why and suggest alternative wording where appropriate.:

No comment

Question 16: a) Do you consider it appropriate to introduce the proposed new Rule 9.9? b) If you do not consider it appropriate to introduce the proposed new Rule 9.9, please explain why and suggest alternative wording where appropriate.:

No comment

Question 17: a) Do you consider that the introduction of a new competition and voting section is appropriate? b) Do you agree with the proposed new competition and voting section for Section Nine? c) If you do not agree with our proposed new competition and voting section, please explain why and suggest alternative wording where appropriate. d) Do you agree that it is appropriate to apply these rules to BBC services funded by the licence fee? e) If you do not agree that it is appropriate to apply these rules to BBC services funded by the licence fee, please explain why.:

No comment

Question 18: a) Do you consider that the rules in relation to programme-related material would benefit from clarification? b) Do you agree with the introduction of the proposed programme-related material section for Section Nine? c) If you do not agree with the proposed programme-related material section, please explain why and suggest alternative wording where appropriate.:

Any improvement in clarification would be welcomed

Question 19: a) Do you consider that the proposed cross reference to the Cross-promotion Code would assist stakeholders? b) If you do not consider that the proposed cross reference to the Cross-promotion Code would assist stakeholders, please explain why and suggest alternative wording where appropriate.:

No comment

Question 20: a) Do you consider that the meanings in relation to sponsorship of television would benefit from revision? b) Do you agree that the revised meanings are consistent with those currently used, but more accurately reflect

the definition of sponsorship as set out in the AVMS Directive? c) If not please explain why, suggesting drafting changes where appropriate.:

No comment

Question 21: a) Do you consider that the rules in relation to the content of sponsored output would benefit from clarification? b) Do you agree with the introduction of the proposed new rules on the content of sponsored output in Section Nine? c) If you do not agree with the proposed new rules on the content of sponsored output, please explain why and suggest alternative wording where appropriate.:

No comment

Question 22: a) Do you consider that the rules in relation to sponsorship credits would benefit from clarification? b) Do you agree with the introduction of the proposed rule? c) If you do not agree with the proposed rule, please explain why and suggest alternative wording where appropriate.:

No comment

Question 23: a) Do you consider that the rules in relation to appeals for funds would benefit from clarification? b) Do you agree with the introduction of the proposed Rule 9.29 and the section on appeals for funds for programming or services? c) If you do not agree with the proposals, please explain why and suggest alternative wording where appropriate.:

No comment

Question 24: a) Do you consider that the proposed rule revisions are appropriate and would remain consistent with current rule requirements? b) If you not, please explain why and suggest alternative wording where appropriate.:

No comment

Question 25: a) Do you wish to suggest an alternative approach to the proposed revisions in relation to the regulation of commercial references on television? b) If so, please outline your proposals, which should comply with relevant legislation (including the Communications Act 2003, the Audiovisual Media Services Directive, the AVMS Directive (Implementation) Regulations 2009 and Article 10 of the European Convention on Human Rights.:

The main objection is that commercial breaks are too frequent and too long. The development of technology that simply allows such breaks to be skipped at the touch of a button, is likely to be in great demand if the channels become overly commercialised.

Question 26: a) Do you consider that the rules on commercial radio would benefit from being separated from those for television? b) Do you agree with the introduction of the proposed new Section Ten on commercial references in radio programming? c) If you do not agree with the proposed new Section Ten, please explain why and suggest alternative wording where appropriate.:

No comment

Question 27: a) Do you consider that it is appropriate for Ofcom to introduce the proposed rules concerning content-related promotions? If so, please explain why. b) If not, please explain why. c) Do you agree with our assessment of the impact of the proposed rules on listeners, the radio industry and any other parties? Please provide any evidence or data you have to support your answer. d) Do you consider that the proposed rules would maintain the editorial independence of the broadcaster and provide adequate consumer protection? e) If not, please explain why, suggesting drafting changes where appropriate.:

No comment

Question 28: a) Do you consider that it is appropriate for Ofcom to introduce the proposed rules concerning outside broadcasts sponsored by the venue? If so, please explain why. b) If not, please explain why. c) Do you agree with our assessment of the impact of the proposed rules on listeners, the radio industry and any other parties? Please provide any evidence or data you have to support your answer. d) Do you consider that the proposed rules would provide adequate consumer protection, subject to the maintenance of full transparency concerning sponsorship arrangements? e) If not, please explain why, suggesting drafting changes where appropriate.:

No comment

Question 29: a) Do you consider that it is appropriate for Ofcom to introduce the proposed rules concerning sponsored listener competition features? If so, please explain why. b) If not, please explain why. c) Do you agree with our assessment of the impact of the proposed rules on listeners, the radio industry and any other parties? Please provide any evidence or data you have to support your answer. d) Do you agree that the proposed rules would provide adequate consumer protection, subject to the maintenance of full transparency concerning sponsorship arrangements? e) If not, please explain why suggesting drafting changes where appropriate.:

No comment

Question 30: a) Would you consider that it is appropriate for Ofcom to introduce rules that would allow Public Information Programming (as

described above)? If so, please explain why. If not, please explain why not. b) If Ofcom were to introduce rules in relation to Public Information Programming: i. Are there any potential programmes that you believe could comply with the potential rules but that you consider would be undesirable or arguably not in the public interest? If so, please give details. ii. What impact (e.g. social, economic, equality) do you think the potential rules would have on listeners, the radio industry and any other parties? Please provide any evidence or data to support your answer. iii. Do you consider that the potential rules would maintain the editorial independence of the broadcaster and provide adequate consumer protection? If not, please explain why. iv. Do you consider that additional or alternative safeguards to those included in the draft proposed rules are necessary? If so, please provide details. v. Specifically, should there be any restriction on the type of non-commercial, not-for-profit entities permitted to fund Public Information Programming, and if so, what restrictions? vi. Do you consider that it would be appropriate for Ofcom to review these rules two years after their introduction? If not, please explain why. :

No comment

Question 31: a) Do you consider that the proposed new Section Ten would benefit from the introduction of new meanings? b) Do you agree with our proposed new meanings for Section Ten? c) If you do not agree with our proposed new meanings, please explain why and suggest alternative wording where appropriate.:

No comment

Question 32: a) Do you consider that the introduction of new Principles in relation to Section Ten is appropriate? b) Do you agree with the proposed new Principles for Section Ten? c) If you do not agree with our proposed new Principles, please explain why and suggest alternative wording where appropriate.:

No comment

Question 33: a) Do you consider that the proposed Rules 10.1 to 10.5 are broadly the same, in terms of both scope and intent, as current Rules 10.1, 10.2, 10.3, 10.4, and 10.12? b) If you do not consider the proposed rules are broadly the same as the current rules in this area, please explain why and suggest alternative wording where appropriate. c) Do you agree with the introduction of the proposed new Rule 10.6? d) If you do not agree with the proposed new Rule 10.6, please explain why and suggest alternative wording where appropriate.:

No comment

Question 34: a) Do you consider it appropriate to introduce the proposed new meaning of product placement, to reflect the definition required for television? b) If not please explain why, suggesting drafting changes where appropriate.:

No comment

Question 35: a) Do you consider it appropriate to introduce the proposed new Rule 10.10? b) If not please explain why, suggesting drafting changes where appropriate.:

No comment

Question 36: a) Do you consider that the introduction of a new competition and voting section is appropriate? b) Do you agree with the proposed new competition and voting section for Section Ten? c) If you do not agree with our proposed new competition and voting section, please explain why and suggest alternative wording where appropriate. d) Do you agree that it is appropriate to apply these rules to BBC services funded by the licence fee? e) If you do not agree that it is appropriate to apply these rules to BBC services funded by the licence fee, please explain why and suggest drafting changes where appropriate.:

No comment

Question 37: a) Do you consider that the rules in relation to programming-related material would benefit from clarification? b) Do you agree with the introduction of the proposed programming-related material section for Section Ten? c) If you do not agree with the proposed programming-related material section, please explain why and suggest alternative wording where appropriate.:

No comment

Question 38: a) Do you consider that the meanings in relation to sponsorship of radio would benefit from revision? b) Do you agree that it is appropriate for Ofcom to introduce the proposed meanings in relation to radio sponsorship? c) If not please explain why, suggesting drafting changes where appropriate.:

No comment

Question 39: a) Do you consider that the rules in relation to the content of sponsored output would benefit from clarification? b) Do you agree with the introduction of the proposed new rules on the content of sponsored output in Section Ten? c) If you do not agree with the proposed new rules on the content

of sponsored output, please explain why and suggest alternative wording where appropriate.:

No comment

Question 40: a) Do you consider that introduction of rules in relation to Service Level Agreements is appropriate? b) Do you agree with Ofcom's proposed rules on Service Level Agreements? c) If not please explain why, suggesting drafting changes where appropriate.:

No comment

Question 41: a) Do you consider that the rule in relation to appeals for funds would benefit from clarification? b) Do you agree with the introduction of the proposed Rule 10.55 and the section on appeals for funds for programming or services? c) If you do not agree with the proposals, please explain why and suggest alternative wording where appropriate.:

No comment

Question 42: a) Do you consider that the proposed rule revisions are appropriate and would remain consistent with current rule requirements? b) If you not, please explain why and suggest alternative wording where appropriate.:

No comment

Question 43: a) Do you wish to suggest an alternative approach to the proposed revisions in relation to the regulation of commercial references on radio? b) If so please outline your proposals, which should comply with relevant legislation (including the Communications Act 2003, Article 10 of the European Convention on Human Rights, Schedule 1 of The Consumer Protection from Unfair Trading Regulations 2008 and The Community Radio Order 2004). :

No comment

Question 44: a) Do you agree with the proposed approach which only proposes changes to Section One of the Code in relation to material of a sexual nature, only proposes changes to Section Two in relation to Competitions and Voting, and proposes no changes to Sections Three to Eight. b) If you do not agree with our approach, please explain which other sections of the Code you consider should be reviewed and why. c) Do you agree with Ofcom's approach which will be to provide, and update, guidance to all sections on an on-going basis? If so, are there particular areas where you consider an updating of guidance would be helpful?:

Provided this does not lead to an increase in sexual content on television, Yes.