

Concerning your recent discussion paper:

One issue that should be important to both consumers and citizens is joined up regulation. There is no point in prohibiting content on one platform whilst permitting it on another. Unfortunately joined up thinking does not appear to have been given a high enough priority by Ofcom (or the Government) and as convergence dawns the regulatory gaps are becoming evermore obvious.

Take one contentious issue as an example of lack of joined up regulation - broadcasting of adult pornography. BBFC rated R18 DVD's can be bought by adults in the high street and most European adult broadcasting is of the hardcore variety with such channels being widely advertised and subscribed to in the UK. More importantly anyone with access to a computer can stream as much hardcore porn as they want without let or hindrance at any time of day or night.

The regulatory response to this situation has been disjointed and divergent. The Government has adopted a policy of indefinite indecision over what to do about European broadcasters and is still considering what action to take over proscription orders 8 years on. As for Ofcom it has decided to apply the "precautionary principle" to ban R18 rated content from all late night PIN protected adult channels.

I look forward with interest to see how this develops from a regulatory perspective.

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