

10 September 2012

Content, International and Regulatory Development Group  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London  
SE1 9HA

**RE: Ofcom invites views on the co-regulation of VOD ads**

The Advertising Association is the only organisation that represents all sides of the advertising and promotion industry in the UK - advertisers, agencies and the media. We support and promote effective self-regulation in advertising. We work closely with the ASA and have a seat on both CAP and BCAP.

VOD advertising fell within the remit of the CAP Code before the implementation of the AVMS Directive, and so the industry supported the continuation of this arrangement.

The legal changes required as a result of the AVMS Directive, putting VOD services on a co-regulatory footing with Ofcom, were time-consuming and onerous. However, in practice, the new regime has made no fundamental difference to the way in which VOD advertising is regulated.

It would be inconceivable to have VOD advertising regulated separately from other advertising, and it would be disruptive to industry to change existing arrangements that are working adequately, so we support the continued designation of ASA to co-regulate such services.

Yours sincerely,

Director of Public Affairs