

**From:** Chris Mundy

**Sent:** 22 May 2014 16:53

**To:** Daniel Maher

**Subject:** Invitation to comment on proposal to renew the co-regulatory arrangements for broadcast advertising

Dear Daniel,

I am writing in my capacity of Managing Director of Clearcast in response to Ofcom's consultation on the proposal to renew the co-regulatory arrangements for broadcast advertising.

Clearcast believes that the current arrangements work well. We have reviewed the proposed amendments to the MoU and agree with Ofcom that these are not substantive.

We would like to make one observation on the issue of Political Advertising. We agree that Ofcom should retain responsibility for this area. We would like to note that Clearcast have to take a view from time to time on whether an ad is being inserted by or on behalf of a body whose objects are wholly or mainly of a political nature and that determining this is not always straightforward as many charities have a degree of campaigning in their remit. It would be helpful to be able to consult with Ofcom on this from time to time, or alternatively to refer organisations to Ofcom where we feel they may be caught by this rule, to ensure that every organisation that is allowed to advertise is able to do so whilst protecting the interests of consumers.

One small note on the same paragraph (10d - Political advertising). Clearcast has now been in existence for over 5 years and confusion about Clearcast and the BACC is now negligible. It's Clearcast's view that the BACC does not need to be referenced in future.

Other than that we have no comments of the proposed amendments and would like to commend the work of the ASA in the areas in which Ofcom has contracted out its statutory functions.

Yours sincerely

Chris Mundy

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Managing Director

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