

Your response

Question	Your response
<p>Question 1: Do you agree with our provisional view that the retention of the stricter rules that apply only to PSB channels is not justified? If not, please explain why.</p>	<p><i>No. The biggest switch-over incentive for viewers in the UK is the number and length of commercial breaks. The joy of Netflix, Amazon Prime, Paramount + and Disney + is they are all commercial free. Since they have become available I have watched less content on the PSB commercial channels – and virtually no non-PSB channel content. More advertising dilutes the value of the breaks that currently exists and it is unlikely IF any additional money was raised it would go on free-to-air content. It is more likely to go into ‘premium’ streaming expansion, which no-one will pay for on PSB platforms because it is mainly old content or not very good new shows.</i></p>
<p>Question 2: Do you have a preference between the proposals under Option 1 and Option 2? If you do not agree with the proposals under either option, please explain why.</p>	<p><i>Option 2 is preferable because more advertising breaks are not welcomed by viewers and more ad time dilutes the value of the commercials that currently exist. It is unlikely IF any additional money is raised under this proposal that it would go on free-to-air content. It is more likely to go into ‘premium’ streaming expansion, which no-one will pay for on PSB platforms because it is mainly old content or not very good new shows.</i></p>
<p>Question 3: In the event that we proceed with Option 1 or 2, we suggest a one-year period before implementation. Do you agree? If not, please explain why.</p>	<p>Yes</p>
<p>Question 4: Is there any further information you wish to provide regarding changing the stricter rules in COSTA?</p>	<p><i>Research shows viewers in the USA watch significantly less TV than in the UK or EU. According to Statista primetime advertising times on networks such as ABC, NBC or Fox range from 12 to 17 mins per hour. In the EU it’s 8 mins. Average daily TV viewing time in the EU is 235 mins (Feb 2022), in the USA it is 152 mins. Viewers in the UK may think they won’t mind</i></p>

	<p><i>more commercial breaks now, but when it happens they will hate it and watch less TV which will mean a drop in revenue for the commercial PSB broadcasters which will mean they will come back to Ofcom asking for the further removal of the requirement that makes them PSBs, like airing news in prime time and regional news obligations. What Ofcom should do is retain the status quo.</i></p>
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