



Call for Input: Review of Broadcast Regulation

Comment from Paramount, February 12 2026

Paramount agrees with Ofcom's assessment that the UK media landscape is changing at pace. As global technology platforms continue to expand the volume and reach of their content offerings – and their role as gatekeeper to audiences for other content providers – traditional broadcasters face intensifying competition for audience attention.

In this more dynamic and challenging environment, public service broadcasters are finding it increasingly difficult to sustain the funding required to produce and distribute high-quality UK content for all audiences. These pressures also extend to the wider UK production sector, particularly impacting smaller producers and those based in the nations and regions.

In its review of public service media, *Transmission Critical*, Ofcom called for urgent action to strengthen and sustain public service media content. It is noted that Ofcom's express goal is to ensure that regulation does not inhibit innovation or discourage investment in public service media content. With that goal in mind, and within the confines of the framework set out in the consultation document, please find below some brief comments from Paramount regarding the areas that it would welcome Ofcom focussing on. These comments should be read as complementary to those submitted by Everyone TV and CoBA.

Licensing

Most television and radio broadcast services are required to hold a licence issued by Ofcom. These licences set out the regulatory framework within which services operate, including obligations relating to programming, advertising, and content standards.

We believe that current licencing arrangements are suitable for the delivery of Public Service Media (PSM), but agree with Ofcom's position that, over the longer term, the licensing framework is likely to require more fundamental reform to reflect a fully digital media environment.

- Ofcom should consider the lack of dynamism and excessive process required to gain a new channel licence, or to change the name of a channel. In the dynamic IPTV era, broadcasters may wish to add or remove channels at short notice alongside a sporting event, or to run a themed channel for a short period of time to help promote content on the main PSB channel. More flexibility from Ofcom in terms of licencing would be welcomed. We would like to see a flexibility in the TLCS licencing process to adapt to the new market dynamics.

Advertising

Traditional linear advertising models have been significantly disrupted in recent years, placing increasing pressure on the financial sustainability of commercial public service broadcasters and other broadcasters. At the same time, there are marked differences between broadcast and online services in terms of the volume of advertising permitted, how it is scheduled, and the extent to which services can cross-promote their own content.

As a result, audiences experience advertising very differently depending on where and how they consume content. We understand that Ofcom wishes to take a fresh look at advertising regulation, including whether existing rules remain appropriate or should be updated or removed to reflect the divergence between linear and online services.

TV advertising continues to be of critical importance to advertisers that seek mass audiences. Despite a steady decline in TV spot advertising spend it remain significant at £2.8Billion in 2024¹, it remains the most critical source of revenue for commercial broadcasters. Spot advertising was 66% of Total TV revenues in 2024 and BVOD was 22%.

- We would not support Ofcom re-visiting the harmonisation of advertising minutage between PSB and commercial channels (COSTA Review 2023) as no substantive changes to the market have occurred since the last review. Aside from the revenue risk we highlighted as part of the 2022/2023 review, which remains, we are very supportive of ISBA's previous comments that "there are too many unknown factors and consequences which an amendment to COSTA could bring to the audience experience, competition, and long-term financial sustainability of the TV advertising market"².

Content standards

We note that one of Ofcom's priorities for 2026 is the implementation of the new Video on Demand Code that will form part of the implementation of the Media Act. Looking further ahead, we understand Ofcom wishes to consider the content standards regime as a whole. This includes ensuring that rules apply fairly and consistently to content wherever it is accessed, align effectively with the Online Safety regime, and continue to protect audiences.

We support the principle that content regulation should evolve in line with technological developments and changing consumer expectations. On that basis, we believe certain broadcast rules should be reviewed with a view to deregulation. In this regard we believe some rules on broadcast should be reviewed with a view to de-regulate.

- Ofcom should review, with the intention of simplifying, the rules governing advertiser-funded and sponsored content (Section 9 of the Broadcasting Code). The existing UK framework comprises a complex web of principles and detailed rules,

¹ AA/WARC, Ofcom, company reporting, Oliver & Ohlbaum estimates and analysis

² ISBA response to the Ofcom Call for Evidence on proposed changes to COSTA rules 2022.

particularly around due prominence. This complexity has a chilling effect on the market: uncertainty about what is and is not permitted means that companies are often reluctant to engage in this area unless they are prepared to accept a relatively high level of regulatory risk.

- The Section 9 rules have become increasingly misaligned with audience expectations, particularly when contrasted with the lighter-touch approach applied to online services. The current level of complexity is no longer justified in a converged media environment.
 - A more proportionate framework could focus on a small number of core principles—most importantly, clear and explicit transparency for viewers—while allowing providers greater flexibility in how those principles are delivered.
 - Further, alongside this, Ofcom should consider reviewing the Cross-promotion Code which governs cross-promotion of licensees' associated products and services. De-regulating rules on cross-promotion, whilst maintaining appropriate protections for audiences, could help PSB channels to remain sustainable in the face of systemic declines in the TV advertising market.
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