

Title:

Mr

Forename:

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Surname:

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Representing:

Organisation

Organisation (if applicable):

United Christian Broadcasters

Additional comments:

As a TV broadcaster we would find it very beneficial if OFCOM would provide more detailed guidelines on duly prominent references to proprietary communication platforms in TV programming.

The guidance for Section 9.5 of the Broadcasting Code states that the frequency with which the proprietary platforms are mentioned should be justifiable editorially. However, for example, there is no specific guidance on what OFCOM deems acceptable regarding the frequency and duration of such references.

We deal with a number of international content providers who like to feature proprietary means of communication on lower third straps very frequently. These programmes aren't broadcast live in the UK and so don't rely heavily on audience comment although they often encourage retrospective comment to help them improve their programming.

Because of the ambiguity of the code's requirements in this area we have been imposing these suggested guidelines on them:

We suggest that any single lower thirds strap or bug pointing to a proprietary or non-proprietary means of communication should last no longer than 30 seconds and occur no less than 7 minutes apart.

This is an estimate on our part due to the lack of specific guidance in this area. If OFCOM could outline more appropriate guidelines for this based on what they deem appropriate then this would be very helpful.

Similar specific guidelines would also be appreciated for non-proprietary means of communication such as e-mail and telephone numbers as well as website URLs.

Many thanks,
Ben Emery

Question 1: Are there areas of Ofcom's overall strategic approaches and purposes, outlined in last years' annual plan that may need to change?:

Question 2: What are the issues and areas that should form Ofcom's priorities or major work areas in 2014/15?:

Question 3: Are there any specific areas for deregulation or simplification in the coming year?: