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Mr. Antony Szykaruk
5th Floor
Content and Standards Group
Ofcom
Riverside House
2a, Southwark Bridge Road
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SE1 9HA

29th April'09

Dear Mr. Szykaruk,

I write to express my concern at Ofcom's proposed changes to the way Compliance operates within the ITV Network. It is my belief that the proposed changes will drive companies like Channel Television out of the market, leaving Independent Producers little choice but to accept the commissioning Broadcaster, in effect ITV PLC, as Compliance Licensee.

As an Independent Producer, over the past seven years I have supplied many Drama Productions to ITV Network Ltd. Through Ecosse Films Ltd.: "Amnesia" (2 x 90'), "Like Father, Like Son" (2 x 90'), "Under The Greenwood Tree" (1 x 120'), and "Heartless" (1 x 90'). And through TXTV Ltd.: "Torn" (3 x 60') – the most recent drama production on ITV to be selected by the Royal Television Society as one its three nominees for best Drama Serial. All of these productions were high-profile, primetime shows attracting substantial audiences.

In producing the above film dramas, by choice I have been the fortunate recipient of Compliance Services provided by Channel Television. I cannot stress too strongly how important objective, impartial and efficient Compliance is to every independent producer. Formal contracting during pre-production can be fraught with difficulties, needlessly expensive and often obstructive when it comes to the management of essential talent elements. A compliance service without agenda and free from undue influence is surely an essential component of an open-market in which independent production is guaranteed by legislation.



The same may be said equally of post-production. Quite apart from the application of specific technical regulations, there are many subtle aspects to the exercise of Compliance that require sympathetic editorial understanding and interpretation. Is it really possible that absolute impartiality can be guaranteed if Compliance is operated solely by the commissioning Broadcaster?

As the system currently stands, Channel Television's Compliance Service offers many positive qualities to the Independent sector. It is my hope that Ofcom will take note of this request to maintain the status quo, thus ensuring the continuing presence of an alternative, fully independent Compliance service.

Channel Holdings Ltd. is a minority shareholder in TXTV Ltd. However, this in no way affects the objectivity of the points raised in this letter.

Yours sincerely,

A handwritten signature in black ink, which appears to read 'Jeremy Gwilt'. The signature is fluid and cursive, with a long, sweeping underline.

Jeremy Gwilt
Managing Director
TXTV Ltd.
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