

Title:

Mr

Forename:

Colin

Surname:

Pascoe

Representing:

Organisation

Organisation (if applicable):

Viasat Broadcasting

Email:

What do you want Ofcom to keep confidential?:

Keep nothing confidential

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Ofcom should only publish this response after the consultation has ended:

Yes

Question 1: Which option (or variation of an option) for regulating the overall amount of advertising permitted on television channels do you prefer, and why? Do you agree that any rule changes that might result in a significant change to the number of commercial impacts should not come into force before 1 January 2010?:

Option 1 - Status Quo - Viasat does not see any reason to level down the hourly average on Other channels. Viasat believes the current allowance for commercial advertising both satisfies the consumer/viewer and the broadcaster. A levelling down

may have an effect on the quality of programming on Viasat's channels. Any changes should not come into effect until Jan 2010.

Question 2: Which option (or variation of an option) for regulating peak-time minutage on public service channels do you favour, and why? Do you agree that any rule changes that might result in a significant change to the number of commercial impacts should not come into force before 1 January 2010?:

As this concerns PSB and Viasat is not a PSB Viasat has no comments to this question

Question 3: Do you agree that the 7am to 9am period should cease to be treated as a peak viewing period on public service channels? If so, do you agree that this change should come into effect shortly after Ofcom publishes its conclusions?:

No Comment (as above)

Question 4: Which option (or variation of an option) for regulating the number of advertising breaks do you favour, and why? Do you agree that any changes should come into effect shortly after Ofcom publishes its conclusions?:

Viasat believes that Option 1 works well for broadcaster and viewer. Viasat does not see great benefit in allowing Option 2, but does also not have a great resistance to allowing it either.

Question 5: Do you support or oppose the idea of allowing more frequent breaks in programmes of autonomous parts? Please explain your reasons. Do you agree that any changes should come into effect shortly after Ofcom publishes its conclusions?:

Viasat's experience is that more frequent breaks generally are not well recieved by the viewers and therefore has the opposite effect on viewership. This may be more acceptable to the viewers in programmes with autonomous parts. While Viasat does not oppose this idea Viasat's experience is that the current rules are sufficient for all types of programmes.

Question 6: Do you think that the existing limit on the length of internal advertising breaks on PSB channels should be kept or scrapped? Please explain your reasons. Do you agree that any changes should come into effect shortly after Ofcom publishes its conclusions?:

No Comment (as above)

Question 7: Which option or options for regulating teleshopping do you favour, and why? Do you agree that any changes should come into effect shortly after Ofcom publishes its conclusions?:

Viasat does not see any reason against allowing 'Other channels' to have unlimited Teleshopping windows as they wish. Therefore Viasat is in favour of Option 2 & 3 in this instance. Maybe a slight variation to Option 2 would be applicable to limit the PSB's allowance to 6hours and Other channels to any amount. I believe the PSB's

should be protected from full allowance of teleshopping. The changes can be made after Ofcom publishes its conclusions.

IA Question 1: Given the options being considered in this consultation document is it reasonable to maintain the assumption that there will not be any ?drop off? in audiences? If you disagree, please explain why.:

IA Question 2: Do respondents agree that it is reasonable to focus on the elasticity approach for translating changes in the volume of impacts into changes in industry revenues and to move away from using the constant price premium and uniform price premium approaches? If not, please provide an explanation.:

IA Question 3: Do you agree with our assessment of the impacts on stakeholder groups of this option and variants upon it? Please explain your reasoning, providing any evidence where relevant.:

IA Question 4: In the event that there were to be a reduction in the amount of airtime allowed for non-PSB channels, what would be the effect on the price of advertising on these channels? Would there be any effect on the relative prices of advertising between PSB and non-PSB channels? If so, please explain.:

IA Question 5: Do respondents consider that our approach to considering changes in the frequency of advertising breaks is reasonable? If not, please suggest alternative approaches that you have used, together with any results that you have generated.:

IA Question 6: Do respondents agree with our assessment of the likely scale of the impact of Option 2 for broadcasters? If not, please explain why and provide any relevant evidence that you may have.:

IA Question 7: Do you agree with the indicative results of our assessment of the impact of Option 3? If not, please explain your reasoning. If you are able to quantify the impact of this option, please submit that evidence with your response.:

IA Question 8: Do consultees agree with our assessment of the likely impacts of the different options? If not, why not? Can you suggest any alternative approaches to assessing the impact of the different options?:

IA Question 9: What evidence is there of pent-up demand for teleshopping services? Do channel operators consider that they could offer longer teleshopping windows or develop their own teleshopping services if the current restrictions were relaxed?:

IA Question 10: What has been the impact on channels offering dedicated gaming services on the PSBs offering limited strands of similar programming? Please provide any data that you might have.:

IA Question 11: Do respondents agree with the above analysis in respect of the potential impact on PSBs and non-PSBs? If not, please explain why.:

IA Question 12: To what extent do respondents agree that the elasticity of demand for advertising could vary by time of day? Would this be applicable to all broadcasters or more relevant to some than others? Please provide any evidence that you might have to support your view.:

IA Question 13: To what extent do respondents consider that some of these approaches help to explain at least some of the differences between some industry perceptions of the elasticity of demand for advertising and the econometric data?:

Additional comments: