

UK viewers' attitudes towards potential changes to television advertising regulation

Deliberative research findings

Research document

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Introduction

Television advertising in the UK has been regulated since commercial television began with the launch of ITV in the middle of the last century. From the mid-1950s until the end of the 1980s, the rules reflected domestic policy, but after the implementation of the *Television without Frontiers* (TWF) Directive, they were set within the context of a European framework.

The last review of advertising regulation was conducted in 1997 by Ofcom's predecessor, the Independent Television Commission (ITC). Nevertheless, the rules remained basically unchanged since 1991, and many were substantially the same as when they were first made in the earliest days of commercial television regulation.

Since then, the TWF Directive has been amended to become the *Audio-visual Media Services* (AVMS) Directive. During discussions in Europe about the AVMS Directive, Ofcom supported efforts by the UK Government to maximise the scope for member states to exercise discretion in regulating television advertising. These efforts were largely successful. As a result, there are very few areas where the AVMS Directive requires the UK to change its advertising regulation regime. Ofcom could therefore retain, relax or scrap many of the rules set out in the *Rules on the Amount and Distribution of Advertising* (RADA).

As a result, Ofcom decided last year to carry out a comprehensive review of the rules on how much advertising can be shown on television, where it can be placed, and how often it can be shown.

To inform this regulatory review, Ofcom commissioned an independent market research company, Holden Pearmain Ltd to conduct a research amongst the UK television viewing public in order to gather opinions towards any potential changes in the amount and scheduling of television advertising. This research was qualitative in nature and took the form of deliberative workshops, which allowed participants to be informed of the current issues facing broadcasters and the existing RADA rules, thus enabling them to take a more considered view when discussing possible rule changes. Workshops took place in a variety of locations around the country with a cross section of the population in May and June 2008. Further details of the research are given in section 4 of this report.

Since the research was commissioned, Ofcom has published the outcome of Stage One of its review¹. Ofcom decided to replace RADA with a shorter and simpler Code that came into force on 1 September 2008. The changes removed outdated or unnecessary rules that had little or no beneficial impact, either on viewers or broadcasters, and in some cases, are unhelpful, both to viewers and broadcasters.

One old rule which has been dropped forced broadcasters to adopt a pattern of advertising breaks that is unpopular with viewers was the so-called '20-minute rule', which obliged broadcasters to ensure an interval of at least 20 minutes between the start of one internal advertising break and the start of another. This rule led to some programmes including breaks very soon after the start of the programme, and very soon before the end, so that internal breaks could be spaced 20 minutes apart.

¹ Code on the Scheduling of Television Advertising – Revised rules on the scheduling of television advertising, Ofcom, 24 July 2008

⁽http://www.ofcom.org.uk/consult/condocs/rada/statement/statementcode.pdf)

Other rules - on the amount of advertising and teleshopping permitted on television, and the number of advertising breaks in programmes of a given duration – have remained unchanged, pending the outcome of Stage Two of the review. Alongside this research, Ofcom has published a consultation paper on these issues. The deliberative research sheds light on viewers' attitudes towards some of these issues, and Ofcom will take the results into account when deciding on whether there should be changes. It will also take into account responses from stakeholders to the Stage Two consultation.

Overview of the rules²

The rules are set out in Ofcom's *Code on the Scheduling of Television Advertising (COSTA)*. The *Television without Frontiers* (or TWF) Directive limits the daily amount of advertising on television channels to an average of nine minutes an hour (plus up to three minutes of teleshopping spots³), but no more than 12 minutes in any one hour. This means that a channel broadcasting for 24 hours a day could show up to 216 minutes of advertising spots (nine minutes x 24 hours), and up to 72 minutes of teleshopping spots, a combined total of 288 minutes.

In addition, there must be a break of 20 minutes between advertising breaks within a programme. The effect of this rule is to allow up to two breaks within a half hour programme and three breaks within a one-hour programme. This does not affect the advertising shown between programmes, however short the programme may be. Except in special cases, advertising must be taken during a 'natural break' in programming (e.g. at the end of a comedy sketch, rather than halfway through).

Ofcom applies these rules to most television channels licensed in the UK. But it applies stricter rules to the public service channels (ITV1, GMTV, Channel 4, Five, S4C). The daily amount of advertising on these channels is limited to an hourly average of seven minutes (with no additional amount allowed for teleshopping spots), subject to a cap of twelve minutes in any one hour.

During peak viewing times, there are further restrictions on the amount of advertising. From 7am to 9am, and from 6pm to 11pm, public service broadcasters may only show an average of eight minutes of advertising per hour. PSB channels also have stricter rules on their advertising breaks: they can only have one break in a half-hour programme.

Figure 1 Summary of current volume rules

PSB channels	Non PSB channels
7 minutes average per hour across all broadcast hours	9 minutes average per hour across all broadcast hours
12 minutes maximum in any one-hour slot	12 minutes maximum in any one-hour slot
Peak time (7-9am & 6-11pm):	
-8 minutes average per hour, maximum of 12 minutes in any one-hour slot.	No peak-time restrictions
-Overall maximum of 40 minutes between 6- 11pm.	

² The rules discussed in this research refer to the rules in place prior to the amendments made on 24th July 2008.

³ Teleshopping is television advertising which includes direct offers to the public to supply goods or services, in return for payment.

RADA⁴ also contains more detailed rules, limiting advertising within particular kinds of programme. There are restrictions on advertising in programmes with a religious theme, news and current affairs programmes, children's programmes and others.

Figure 2 Summary of current distribution rules

PSB channels	Non PSB channels		
End/start breaks: no restrictions	End/start breaks: no restrictions		
Internal breaks: genre-specific	Internal breaks: genre-specific		
-Films: restrictions based on the film length:	-Films: restrictions based on the film length:		
Under 29 minutes – no breaks	Under 29 minutes – no breaks		
• 30 - 59 minutes – 1 break	• 30 - 59 minutes – 1 break		
• 60 - 89 minutes – 2 breaks	• 60 - 89 minutes – 2 breaks		
• 90 – 119 minutes – 3 breaks	• 90 – 119 minutes – 3 breaks		
• 120 – 149 minutes – 4 breaks	• 120 – 149 minutes – 4 breaks		
• 150 – 179 minutes – 5 breaks	• 150 – 179 minutes – 5 breaks		
• 180 – 209 minutes – 6 breaks	• 180 – 209 minutes – 6 breaks		
 News, documentaries, children's and religious programmes: no break in programmes less than 30 minutes Sports programming: natural breaks 	- News, documentaries, children's and religious programmes: no break in programmes less than 30 minutes Sports programming: natural breaks		
All other programming: internal breaks	All other programming: internal breaks		
(based on programme length)	Under 26 minutes - 1 break		
Under 20 minutes = no breaks 21-44 minutes = 1 break	26 – 45 minutes – 2 breaks		
45-59 minutes = 2 breaks	46 – 65 minutes – 3 breaks		
60-89 minutes = 3 breaks	66 – 85 minutes – 4 breaks		
90-119 minutes = 4 breaks	86 – 105 minutes – 5 breaks		
120-149 minutes = 5 breaks	106 – 125 minutes – 6 break		

⁴ The rules discussed in this research refer to the rules in place prior to the amendments made on 24th July 2008.

Executive summary

3.1 General attitudes towards advertising

Viewers in the research workshops were generally tolerant of the current levels of advertising, with many realising that they were a trade-off for receiving free commercial television. But they thought that advertisements were too frequent during films, and were annoyed by increases in volume during the advertising breaks.

However, for many, advertising breaks were seen as providing useful time periods for doing household chores, or making phone calls or texting.

Some advertisements were appreciated and considered to be worth watching in their own right, for their humour and high production values.

There was very little knowledge of current rules other than content restrictions (watershed rules, honest, decent, no junk food ads in children's programmes). Many people were surprised to hear about the rule differences between cable and satellite channels and the commercial terrestrials. All were encouraged to know that rules were in place to guard against intolerable levels of advertising, such as those experienced in the United States – this type of unrestricted marketplace was considered to be the worst possible scenario for television advertising, and there was universally strong resistance to this.

Viewers agreed that now was a good time to review the television advertising regulations.

Top-of-mind responses towards proposals for shorter, more frequent advertising breaks were largely negative. Participants thought that more frequent break patterns would be too disruptive; they would spoil the viewing experience. If any increases were to take place, the spontaneous judgement was towards longer advertising breaks. Viewers felt that they would not notice 'the odd extra 30 seconds of advertising'.

3.2 Responses to potential changes

Viewers in the different research locations were consistent in their responses towards potential changes. Any differences that were apparent were largely age or life-style related.

Participants agreed that the time was right for a review of advertising regulations, and that it was fair to have a more flexible approach in today more advanced and diverse media landscape. Viewers did, however, express consistent and repeated concerns about a 'slippery slope' towards American-style television advertising, insisting that any relaxation of the rules should be closely monitored.

Responses towards potential changes in advertising minutage allowances

Overall, viewers felt that there should be a 'level playing field' between the cable and satellite channels and public service channels and, on balance, thought that the terrestrial channels should be allowed more minutage flexibility, in line with the non-PSBs. Allowing more peak-time minutage was felt to be acceptable, as long as the 12-minute maximum per hour rule was adhered to.

Viewers also expressed the desire for some form of additional regulation/legislation, to ensure that any increased advertising revenue arising from rule relaxation was re-invested into programme development rather than used to increase shareholder profits.

Responses towards potential changes in break frequency rules

The concept of fewer, longer, breaks was the overall preference for most age groups.

Many viewers, particularly older viewers, found the idea of more frequent, but shorter breaks too disruptive. They equated this with American style advertising which, as previously noted, was universally disliked.

However, when potential new break patterns were viewed, using test reels, shorter, more frequent breaks were considered acceptable for some genres (quizzes, makeover shows, reality programmes) and in some day parts (magazine-style shows in daytime, e.g. *This Morning*).

However, there were limits to the acceptability of increasing the number of internal breaks:

- four breaks an hour in a 60-minute programme was considered acceptable;
- five breaks an hour in a 60-minute programme was considered unacceptable; and
- views were divided on the acceptability of two internal breaks n a 30-minute programme.

20 minute scheduling rule

There was a clear consensus across all groups that the 20 minute rule should be abolished. Participants could not understand its relevance and generally disliked the disruption it caused to the viewing experience. They had a strong preference for evenly spaced breaks.

Issues regarding sponsorship

Viewers were surprised that advertising minutage did not include programme sponsorship. They felt there was a need for programme sponsorship to be included in the time allowances, or for some other kind of cap to be placed on programme sponsorship, as the cumulative increase in sponsorship 'bumpers' was considered to be a huge negative.

Other issues

Viewers also discussed the possibility of ensuring that advertisements are not repeated too many times during an evening's viewing. Repetition, both of standard commercials and of programme sponsorship, was thought to make any increases in minutage far more noticeable and far more irritating for the viewing public. Some viewers with digital video recorders claimed they would 'zap' through the ads, while others claimed they would switch the television off altogether if advertising became too repetitive.

Research details

4.1 Research objectives

The overall aim of the study was to involve the UK viewing public in the decision-making process about how the current television advertising rules might be changed. This research took place alongside the period of public consultation (March – May 2008).

The objectives set for the research were:

- to understand current attitudes towards advertising (volume and frequency) and behaviours during advertising breaks;
- to investigate UK television viewers' understanding of how television programming is funded;
- to inform television viewers about the way television is funded and the implications of the AVMS Directive, in order for them to make informed views on possible changes in the volume and frequency of advertising;
- to assess specific reactions to a range of scenarios for television advertising on both PSB and non-PSB channels;
- to compare opinions towards these test scenarios with current advertising break minutage and frequency schedules.

Full details of the research, including locations are detailed in Appendix 1.

4.2 Deliberative research

A deliberative research methodology was used for this study. Deliberative research is a type of qualitative research that is used when researching topics that people would struggle to understand, and comment on effectively, in a classic 1.5 - 2 hour focus group. Typically, it is a methodology used when participants are required to understand complex or technical matters in order to make an informed decision, usually on proposals for change, or on subjects which have an overall impact on citizens, but not much individual or personal relevance.

Deliberative research is a technique that is becoming increasingly useful in engaging the public in significant policy decisions, where an informed public view is required, but where members of the general public would be unlikely to respond via normal public consultation methods.

The format of deliberative research is larger-scale (with 25 - 50 respondents per session) than traditional focus groups (8-10 respondents per session), as this allows a combination of plenary sessions, presentations and break-out groups.

The typical format of a deliberative event is:

1. spontaneous views on the subject matter;

- 2. presentations to inform participants of relevant issues;
- 3. considered debate on the subject matter and proposed changes.

This format enables participants to deliberate over all the issues involved in the decision making process. Participants are given as much information as possible during the research sessions about the core issues, so that they are able to make informed choices and recommendations.

4.3 Workshop Flow

The workshop flow for this project was as follows:

Whole group session 1:

- Introductions from the research agency and Ofcom, explanations about the day and its key objectives
- Break-out session 1: Current attitudes towards television advertising and typical behaviours during television advertising breaks. Reactions towards current advertising levels in terms of minutage and frequency of breaks. An exploration of how television is funded

Whole group session 2:

- Ofcom presentation 1: "Television advertising: why it is important and what the rules are"
- Break-out session 2: An exploration of attitudes to Ofcom's first presentation

Whole group session 3:

- Ofcom presentation 2: "Why Ofcom is considering changes to the television ad rules"
- Break-out session 3: An exploration of attitudes to Ofcom's second presentation

Lunch break

Viewing sessions

- 60-minute viewing session:
- 60-minute scenario discussion concept form only:
- 30-minute viewing session

After each viewing session participants were probed on their reactions to the balance of ads to programme and their overall viewing experience.

Participants were also asked to compare the test scenarios with the current ad break pattern during the programme.

Wrap-up session

• Each of the four group facilitators provided a summary of their group's recommendations to the whole workshop.

4.4 Scenarios tested in the research

All the programmes used in the test scenarios were shown during peak time on terrestrial television. Currently, commercial breaks in and around peak time programmes are close to the maximum permitted (12 minutes per hour). Therefore, the scenarios tested reactions to an increase in the *frequency* of breaks (i.e. more and shorter breaks) as we expect the hourly maximum of 12 minutes to be unchanged.. The test scenarios assumed the absence of the 20 minute rule, and showed both more frequent breaks, and more evenly distributed breaks.

It should be noted that in addition to the commercial advertising shown during the breaks in the test scenarios, sponsorship credits were inserted where relevant, and promotional materials such as trailers were also included. Respondents were given clear guidance throughout the workshops that such material could be broadcast in addition to commercial spot advertising, but that it did not form part of the length or minutage of the commercial break.

Scenario 1: 30 minute peak - Coronation Street

The 30-minute scenario was based on *Coronation Street* – shown on weekdays on ITV1 during peak time. This particular programme was selected because it is popular with viewers and to test attitudes to an increase in the number of internal (centre) breaks from one (as currently allowed under existing restrictions) to two.

The scenario consisted of two 2½ minute centre breaks and one-minute end breaks before and after the programme. The current pattern for the 30-minute programme is a single centre break of around 3½ minutes and two end breaks of about 2½ minutes each.

The differences between the current and test scenarios were that the test scenario had two short centre breaks while the current pattern has only one, and the end breaks were shorter in the test scenario.

Scenario 2: 60-minute peak time – Pushing Daises

The current commercial break pattern during a 60-minute peak-ime programme tends to consist of three centre breaks of approximately 3½ minutes each, and one end break of around 1½ minutes. Because the existing rule specifies a minimum of 20 minutes between internal breaks, during a 60-minute programme the first and third centre breaks are placed approximately six minutes from the start and end of the programme.

The 60-minute scenario used in the research was taken from the US import drama series *Pushing Daisies*. The series was broadcast on Saturday evenings on ITV1 between April and June 2008.

The test scenario consisted of five evenly-distributed centre breaks of two minutes each and one two-minute end break.

The main difference between the current pattern and the test scenario was that the test contained more frequent breaks - five shorter, evenly spaced internal breaks, whereas in the current pattern, two of the three 3½-minute centre breaks are placed six minutes from the start and end of the programme respectively.

Scenario 2: 60-minute peak - The Bill

The second 60-minute scenario was based on an episode of *The Bill* – a UK-based drama broadcast on weekdays in peak time on ITV1. The scenario consisted of four internal breaks of $2\frac{1}{2}$ minutes each, evenly spread across the hour with a two-minute end break.

In comparison to the current pattern, the scenario contained more evenly distributed, more frequent, shorter centre breaks – with one fewer internal break than the *Pushing Daisies* example.

All participants viewed one 60-minute test scenario:

- half viewed The Bill and discussed Pushing Daisies in concept form; and
- half viewed Pushing Daisies and discussed The Bill in concept form.

All participants viewed one 30-minute test scenario - Coronation Street

General viewing behaviours

5.1 Media ownership and viewing habits

Television ownership was dependent upon the size and composition of the household. Those with larger families and with more children had more televisions. It was quite common for each child to have his or her own television in their bedroom.

"There's a television for each of the kids....it's the only way to get some peace in our house!" (F,25 – 35, Birmingham)

The participants spoke in terms of their 'main television' being in the living room, with their 'other television' in the bedrooms or other rooms. Older viewers (45 - 65 years) and families often had television in kitchens, dining rooms, conservatories and even the shed, on one occasion.

"I can watch television in every room of the house!" (M, 35 - 44, Newcastle)

"Now that I'm retired it suits me to be able to turn on the television wherever I may be in the house. I move from room to room doing things and it's nice to be able to watch what I want where and when I want to" (F, 45 - 65, Glasgow)

Around half of all participants had multichannel television; the younger viewers (18 - 34s) and those with families, were more likely to discuss multichannel television viewing. The cable or satellite connection was always in the 'main' living room, and although multi-room connections were not common, almost all had Freeview connections in other rooms.

Around a third of the participants used Sky+, Virgin V+ or another DVR system for recording digital television. Younger participants tended to be more knowledgeable and confident about using this type of equipment. Many claimed to fast-forward through the advertising breaks when watching a recorded programme, and all believed that 'Sky+ing' (as it was often generically referred to) had significantly improved their viewing experience:

"It has totally transformed how I watch telly – I Sky+ everything if I can so that I don't have to watch the ads" (M, 18 24, Ealing)

"It's great. With Sky+ you can record a whole series, it does it for you, so you never miss anything. I wouldn't be without it" (M, 35 - 45)

Computer ownership was widespread, especially among the under-45s. Watching television via computer was less widespread, with only one or two per group viewing this way. The only exception to this was among the 18 - 25 year olds, who watched YouTube, Channel 4, *BBC iPlayer* and film downloads on their PCs.

The core viewing time for the majority of participants was in the evening, from 6pm until 11pm. Shift and part-time workers, students, the unemployed and retired people would often switch on the television at around lunchtime for the news, or programmes such as *Loose*

Women. Stay-at-home mothers and some retired participants.also watched GMTV and midmorning programmes such as *Good Morning*.

Viewers aged 35+ tended to divide their viewing into two distinct categories: 'main/regular/normal telly' (the viewers' vernacular for terrestrial) and Sky/Virgin/ satellite or cable. Because these 'older' viewers had grown up with terrestrial television (and therefore far fewer channels) they tended to compare the new multichannel environment with the old 'terrestrial only' model. The younger viewers (and particularly the 18 – 24 year olds) did not make this distinction, having grown up in a far more diverse media landscape. They were far more driven by programmes than by channels.

"I love Bones, Prison Break, Buffy and Angel" (M, 18 – 24, Cardiff)

"I think of it as normal telly versus 'council' telly" (M, 35 - 45, Ealing)

"I can remember the days when we only had three channels" (F, 45 - 65, Newcastle)

However, many participants still said that a large portion of viewing was on the main terrestrial channels. This was because of the programmes available (favourite soaps, news, drama) and because many people felt that there were too many repeats on satellite and cable television. There were also some complaints that there were too many advertisements on cable/satellite television.

"There are so many ads on Sky now that I tend to record the programmes and then zap through the ads" (M, 35 - 45, Birmingham)

Younger viewers were also more likely to be watching less television overall.

There were some gender differences, with men tending to watch more sport, documentaries and wildlife / nature programmes on satellite and cable television, and the women watching more soaps and drama on terrestrial:

"I love all the wild life programmes on Discovery" (M, 35 - 45, Birmingham)

"I've got Sky for the sport only" (M, 45 – 65, Glasgow)

"I like the history programmes that you get on satellite – you don't seem to get them on the main telly" (M, 35 - 45, Ealing)

"I watch all the soaps and dramas – so I suppose I watch more regular telly than Sky" (F, 35 - 45, Ealing)

To summarise some key life-stage differences:

Younger, 18 – 24 year olds:

- actively use DVRs more technically aware and with hectic lifestyles;
- watch television via the PC more than any other age range;

- programme-focused rather than having channel preferences favourite programmes on channels such as Channel 4, E4, More4, Five, Dave, Sky Sport, ITV; and
- Make no real distinction between terrestrial and multichannel television.

25 – 45 year olds / families:

- some individual (daytime) viewing and family viewing in early evening;
- distinction made between 'main' (terrestrial) television and multichannel television;
- watch both terrestrial and cab/sat, with a skew towards terrestrial;
- children often in charge of the remote until 7pm in family households; and
- favourite channels include Channel 5, ITV and BBC.

45 – 65 year olds:

- 'television graze' throughout the day the television is on in the background and they dip in and out of viewing;
- may have television in many rooms;
- television is viewed both individually and with another person;
- generally prefer to watch 'main' (terrestrial) television because they consider the programmes to be of higher quality; and
- make clear distinction between terrestrial (traditional, higher quality) television and cable/satellite television (modern/new, poorer quality).

Attitudes towards advertising

6.1 General attitudes towards television and advertising

Overall, television advertising was considered to be an accepted part of television viewing, described by some as a 'necessary evil'. For many, advertising breaks had become incorporated into the household routine, as they provided an ideal time for doing household chores. Many claimed they would plan their tasks around advertising breaks.

"I set myself a task, like loading the dishwasher in the break....or I'll say that I'm going to Hoover the stairs in the next one and then I can have a cup of coffee and watch in peace" (F, 35- 45, Birmingham)

"I know when the Harvey's ad comes on that it's time to put the kettle on and when it comes back on again it's time to watch telly again" (25 - 35, Weybridge)

People also appreciated some advertising campaigns in their own right, and even looked out for them. Adverts that were humorous, colourful, musical or had high production values were often considered worth waiting for. Favourite ads at the time of the fieldwork included those for Drench (humour), Skoda 'Cake ad' (original content, high production values), Cadbury's Gorilla (humour, originality), and Carlsberg (humour, originality, production values).

Some campaigns were also appreciated because they provided useful public information or safety messages. For example, the 'speeding kills' campaign and the 'don't drink and drive' campaigns were noted as being powerful and effective. Some participants also mentioned the usefulness of commercials regarding digital switchover.

Conversely, participants remembered advertisements that they described as repetitive, dull, boring and with poor production values. Some viewers also complained about advertising that seemed to be too specifically targeted at one consumer group – there were mentions of adverts for life insurance during the afternoon (for the elderly) or loan ads (for the unemployed who may be watching during the day).

There was also some irritation expressed towards the synchronisation of advertising breaks on the cable and satellite channels.

"If you turn over during the breaks on Sky you get the same ads – they are crafty like that, you can never get away from them" (M, 35-45, Ealing)

Generally, however, there was an overall acceptance of television advertising during programmes.

6.2 Behaviours during television advertising breaks

Before attending the workshop sessions, participants were asked to complete a viewing diary for a 'typical' evening's viewing. These diaries were used as a springboard for discussion during the first contextual break-out exercise.

Daytime viewing, both of programmes and advertisements, was least common and appeared to be the least focused. Viewers who watched daytime television claimed they 'dipped in and out' of programmes and often changed channel. The magazine-style programming of daytime television did little to encourage a more stable viewing pattern. However, some participants watched the advertising breaks, particularly if the advertisements were relevant to the programme, e.g. DIY ads during property programes, and fashion and beauty ads during fashion make-over shows.

During the early evening viewing period between 6pm and 9pm, viewing patterns were often disrupted by other things going on in the house (dinner preparation, children's bedtimes etc.) During this time the advertising breaks were often used for chores. This was particularly true for women and older viewers. There was much channel-hopping during this early evening viewing period among all age groups.

The later evening, between 9pm and 11pm, is a much more settled viewing period; chores had been completed, children were in bed and viewers were either too tired, or too interested in the programme to leave the television set. However, younger viewers claimed they were still texting or making phone calls during breaks, and channel-hopping was still going on if viewers were not sufficiently engaged in the programme.

6.3 Opinions towards the volume of advertising

Many of the viewers, particularly those aged 25+, believed that the cable and satellite channels had more advertising than the terrestrial channels. They also felt that some of the adverts were of poorer quality (lower production values/no humour).

Some also felt that advertising breaks were getting longer in general:

"I used to be able to put the kettle on in the break and now you can make the whole meal!" (F, 45 - 65, Birmingham)

Overall, the participants were quite tolerant and accepting of current levels of television advertising, with some expressing gratitude that the UK environment was not as bad as it is in the USA:

"I just don't know how they can watch television over there. There are more ads than programme" (F, 25 - 35, Cardiff)

6.4 Understanding of the role of television advertising

There was a general consensus that television advertising existed mainly to sell products and services.

"They're there to sell you stuff, it's as simple as that!" (M, 35 – 44, Birmingham)

Advertising was also known to have a limited public information role (drink/drive, alcohol limits, digital switchover information).

There was a fairly broad knowledge that television advertising was the main source of revenue for the broadcasters. However, many had never thought about where this revenue went or what it was used for. Some believed that it went back into programming, but a vocal minority were highly sceptical about this. Their perception of the number of repeats, poor

quality quiz and reality shows, and US imports, all suggested a lack of programme-making investment.

The more negative views were largely expressed by the older viewers. The under-24s were generally more accepting, and less critical, of the role of advertising.

Advertising in the form of programme sponsorship was viewed a little differently by some, who believed that revenue from this source was more likely to be ploughed back into the programme it supported.

The overall attitude was one of tolerance and general acceptance of television advertising. There was no real interest in the role of advertising; few had thought about this before the workshops.

6.5 Spontaneous awareness of the current rules

Participants' spontaneous awareness of the rules was extremely limited, in all the workshops, especially of the rules governing ad minutage and/or frequency. There were a few mentions of a 12 -minute ruling, but generally, awareness was limited to rules governing the *content* of ads rather than the amount of advertising.

Many, across all age groups, spontaneously mentioned the 'watershed rule' in that some adult content could be shown after 9 pm. Others were aware that advertising claims had to be "honest, decent and true". Those with families also tended to mention that advertisers had to be careful in what they sold to children – i.e. no junk food advertising in certain programmes.

There were no spontaneous mentions of any rule differences between the cable/satellite channels and terrestrial television. The general assumption was that the rules were the same across the board.

When prompted about the concept of rules governing the minutage and frequency of advertising breaks, the general assumption was that; "something had to be in place otherwise it would be like America". The US advertising landscape was consistently quoted as the worst-case scenario for television advertising.

Informed opinions on the current advertising rules

Participants were given a 15-minute presentation by Ofcom on the role of television advertising and a general outline of the key rules governing advertising minutage and frequency⁵. Participants were also given copies of the presentation to study in the break-out groups that followed the whole group session.

7.2 Informed opinions on television advertising

There was general understanding and acceptance that advertising was the price paid for free commercial television. However, there were quite a few initial complaints, especially from younger viewers, that everyone had to pay the licence fee even if they did not watch the BBC channels.

"I never watch BBC but I still have to pay their licence fee and my Sky subscription and I don't think that's very fair" (M, 25 - 34, Ealing)

Many were surprised by the degree of regulation that was currently in place and that there were rules governing both minutage and distribution patterns. However, on reflection, many noted that such rules *must* have been in place, otherwise television in the UK would have been far more like television in the USA.

"I don't know if you've been to America, but we have had a few holidays over there and it's awful. I don't know how they can watch telly over there. The ads are every 5 minutes" (F, 35 - 45, Ealing)

"I'm grateful to have them otherwise it'd be like America" (F, 45 - 65, Glasgow)

"(if there were no rules) It would be like the States with ads every 2 minutes...it's just that I've never thought about it before" (M, 25 - 34, Cardiff)

So, the initial impressions were that the rules were logical and acceptable.

Respondants' spontaneous preferences regarding changes in advertising rules, at this early stage, were for longer advertising breaks rather than shorter, more frequent breaks. The shorter/more frequent break pattern was, for many, inextricably linked with the US style of advertising - a pattern that was deemed to be highly disruptive to programme flow and the viewing quality typical in the UK.

Many were surprised that there were different rules for the terrestrial and cable/satellite channels. The general assumption had been that there was a 'level playing field'; and some considered the differences unfair. Opinions were divided, however, on whether the playing field should be levelled down or up. The older, 35+ viewers generally believed that the cable/satellite channels should be brought into line with the terrestrial stations, so that

⁵ See appendix 3

everyone had a reduced level of advertising. Some of the younger viewers, however, were worried that a reduction in advertising might mean that some of the smaller, more specialist channels could go out of business. A few also argued that the rule differences should be maintained because the main terrestrial channels attracted huge audiences and could therefore charge more for their advertising:

"I don't feel sorry for them (the main channels) because they must be able to charge a lot more for their ads. Think of all the millions of people who watch them" (M, 25 - 34, Ealing)

On balance, people felt that the terrestrial channels should be allowed more minutage flexibility, in line with the non-PSBs.

7.3 Overall reactions to rule details (minutage/frequency), after presentation

Many participants felt strongly that they were currently watching *more* television ads than were described in the presentation. Indeed, some suspected that broadcasters were flouting the rules, particularly on the cable/satellite channels, which appeared to have far more than 12 minutes-worth of ads in any one hour:

"Does anybody actually check these timings?" (F, 35 – 45, Weybridge)

"It seems like we get far more ads, especially at the beginning of programmes" (F, 35 - 44, Birmingham)

Many people pondered if the rules were actually policed – and if they *were* checked, how often and by whom? Moreover, was this checking procedure in the public domain?:

"I'm sure that the breaks are longer nowadays. I can get to the shops and back during an ad break" (F, 34 – 55, Birmingham)

When it was explained that programme sponsorship was not included in the timings, it was felt that sponsorship was driving the perception of longer breaks. Most agreed, even at this initial stage, that sponsorship minutage should be regulated too, and included in the overall minutage allowance:

"Why don't they include the sponsorship, they are advertising something aren't they? (F, 35 - 44, Cardiff)

"It's advertising through the back door if you ask me" (M, 45 - 65, Ealing)

7.4 Specific reactions to the minutage ruling for the main channels

Participants were given the advertising minutage rules for the main terrestrial channels, as follows:

- An average of seven minutes per hour of advertising throughout the day

- A 12-minute maximum of ads in any one hour

- An average of eight minutes per hour of advertising during peak time viewing (i.e. 6 pm to 11 pm)

- A maximum of 40 minutes of advertising during peak-time viewing

These rules were generally considered to be acceptable in that they allowed a tolerable level of advertising. There appeared to be a good balance between the amount of advertising and programme time.

Many pointed out that they would not want to see an increase on this level of advertising otherwise it would be a 'slippery slope' down to US advertising levels. This viewpoint was particularly apparent in the 35+ viewing group, who were the most resistant to change:

"If we're not careful we'll get like the States and nobody wants that" (M, 45 - 65, Glasgow)

7.5 Specific reactions to minutage rules for the cable/satellite channels

Participants were given the advertising minutage rules for the cable/satellite channels, as follows:

- An average of nine minutes per hour of advertising throughout the day

- A 12-minute maximum of ads in any one hour

Reactions to these rules were mixed, with many of the attitudinal differences being agerelated. The 18 to 34 year olds were fairly tolerant of the more relaxed rules for the cab/sat channels, believing that the niche channels, with their smaller audience figures, needed more advertising to boost their incomes:

"Will it mean that we'll get fewer channels if they don't get more advertising because they'll go out of business?" (M, 18 – 24, Ealing)

There was more debate among the over-35s, some of whom considered the rule differences between cab/sat and terrestrial television to be unfair, and that there should be a 'level playing field'. The consensus, at this stage, was to level the cab/sat rules down to terrestrial levels rather than to 'level up' main television to cab/sat levels. This was because many feared that increased leniency would encourage US-style ad saturation:

"You give them an inch and they'll take a mile....before you know it we'll be just like the States" (M, 35 - 45, Birmingham)

7.6 Specific reactions to the scheduling rules

Participants were given details of the frequency rules, as follows:

- All channels: no breaks in programmes under 20 minutes

- There must be a break of 20 minutes between internal advertising breaks within a programme⁶.

⁶ Since then, this rule has been dropped, although no increase in the number of breaks is allowed.

- Main channels: no more than three 'internal' breaks in a programme 60-minutes long (e.g. 'Britain's Got Talent')

Many, from all age groups, considered the 20-minute rule to be unnecessary. People questioned the significance of a 20-minute time period - it seemed to be an arbitrary figure and few could understand its relevance.

However, this scheduling rule did explain why some advertising breaks started so early in a programme. Quite a few participants had spontaneously commented on this type of advertising pattern, finding it disruptive and detrimental to the whole viewing experience; it interrupted the flow of the programme and broke their concentration. Many stated that they were far more likely to 'channel-hop' during an early ad break as they had not had time to get into the programme. Moreover, this early ad break pattern also hinted at US-style advertising:

"It feels as if we get more ads than programme, especially at the beginning" (M, 35 - 44, Cardiff)

"If the ads got like America, I'd leave the country!" (M, 35 - 44, Birmingham)

"I just don't know how they can watch telly in America?" (F, 45-65, Newcastle)

Reactions towards potential rule changes

Participants were given a second presentation explaining why Ofcom is reviewing the rules⁷. Participants were also given copies of the presentation to study in the break-out groups that followed the whole group session.

The aim of the second presentation was to provide viewers with the broadcasters' perspective on advertising regulation. It detailed the following key themes:

- The multichannel television environment means fewer viewers for each channel and less money for advertising. Advertising revenues have remained static - (total £2.2 billion revenue in 1993, compared to £4 billion in 2007)

- Main commercial channels are particularly affected – especially ITV, which took around 75% of all television revenues in 1993 and now takes only around 30%. Channel 4 takes roughly the same share as it did in 1993.

- Less advertising could mean less revenue for the main channels that commission over 90% of UK programmes (and which are watched by two-thirds of all viewers). This could mean a gradual decline in the amount and/or quality of new programmes, more repeats and less programme choice

8.2 Reactions to the potential rule changes

Many were surprised that the advertising regulations had not been reviewed for so long and agreed that it was sensible to review the rules now. Most appreciated that there had been fundamental changes to the media landscape in recent years and that some of the rules may have to be changed to reflect these changes.

The overall feeling was that it was vital to continue to regulate, to avoid US-style television advertising.

The Ofcom presentation provided viewers with two possible options:

- Keep the rules as they are and do not allow any increases in advertising – but would this mean a gradual decline in the amount and/or quality of new programmes, more repeats and less viewer choice?

- Change the rules to allow more advertising to improve the overall programme viewing experience

The initial choice, from many of the older viewers in particular, was to maintain the status quo. Many were fearful that *any* increased leniency would be abused by the broadcasters and that the viewing experience would be destroyed:

"Before you know it we'll like the States with ads every five minutes" (F, 35 - 45, Cardiff)

⁷ See Appendix 3

However, on reflection, there was a realisation that the rules had not been reviewed for many years and that the media environment had changed dramatically since then. This attitude was particularly driven by the 20-minute scheduling rule which did not appear to suit modern programme styles:

"I can't see the point of the 20-minute rule. Some programmes suit a different pattern, like make-over shows when you go from one house to the other, or with programmes like 'How to Look Ten Years Younger' where they go from one beauty treatment to the next" (F, 35 - 45, Birmingham)

"It's really annoying when you have a break in the first five minutes of a programme" (F, 25 - 35, Newcastle)

Some also believed that despite previous negativity towards ITV, it was not fair to have one rule for the terrestrial channels and another for the cab/sat channels – especially considering the high subscription charges that the cab/sat channels were able to charge. Moreover, this disparity was considered to be particularly unfair to Channel 4 and Five.

Participants understood that change was needed. Some were open to a more flexible approach to television advertising regulations, as long as this did not affect the viewing experience. Viewers spoke in terms of *'not noticing the odd extra 30 seconds of advertising'* but believed that they would find more frequent advertising breaks far too disruptive:

"I don't think you'd notice the odd extra 30 seconds in a break, but you would notice an extra break. That would spoil it for me and I'd probably turn of the telly and do something else" (M, 45 - 60, Ealing)

Many believed that if broadcasters were given the opportunity to gain extra advertising revenues, then Ofcom should be able to regulate that the money was invested in programme development. Viewers wanted to see a direct correlation between increased revenues and quality programming.

Viewers' responses to potential break pattern changes

Research process

All workshop participants viewed one 60-minute peak time drama with a revised/increased break pattern: either *The Bill* (UK drama) or *Pushing Daisies* (US import) and a 30-minute peak time soap (*Coronation Street*).

Each test reel included a recently broadcast episode containing the maximum number of advertisements allowed in the hour (i.e. the full 12 minutes or the half-hour equivalent). Each test reel also demonstrated a revised break pattern, with evenly-spaced breaks (in order to demonstrate the impact of the removal of the 20-minute rule) and one or two extra breaks (in order to investigate the impact on the viewing experience of additional breaks).

The test scenarios were then compared against the original broadcast pattern, as part of the discussion.

After discussing each test scenario, participants were asked to complete a short questionnaire, rating the scenario on a number of key dimensions (which included whether the level/amount of advertising felt about right overall, the number of ad breaks felt about right, the number of ads within each of the breaks felt about right, the amount of advertising was acceptable for this type of programme).

60-minute peak-time drama - UK series (The Bill)

Half the workshop participants viewed *The Bill* test scenario. The reel was designed to illustrate both increased break frequency (three internal breaks compared with four internal breaks) and the abolition of the 20-minute rule (giving more evenly spaced breaks).

The ad break pattern for this scenario is shown in the right-hand diagram below. The diagram on the left shows the ad break pattern for the current situation:

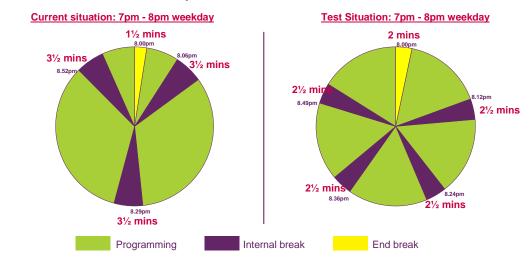


Figure 3 The Bill break pattern: current versus test scenario

Note: 'Current' situations are for illustration purposes only and will vary dependent on channel, programme, etc Programme length refers to scheduled programme length as per programme listings – not the actual length of programme content

Reactions to increased internal breaks, by those viewing 'The Bill' test reel

Viewers were generally positive towards this scenario (compared to *Pushing Daisies* which showed five internal breaks). This positive response was apparent across the board. Although some of this might have been due to the popularity of the programme itself and the level of engagement with the episode selected, the *degree* of support for the revised advertising break pattern was substantial (especially when compared to *Pushing Daisies*). This approval was consistent with the discussions after viewing and was supported by the ratings that participants marked on the post-viewing questionnaire. Viewers' body language, observed while they were viewing the test scenario, also confirmed this (viewers appeared to be involved and engaged throughout the hour-long test).

Immediately after viewing, many participants stated that they thought the hour's viewing felt *'normal'*. Indeed, some believed there had been three rather than four advertising breaks during the broadcast transmission:

"The ads seemed okay to me. I thought that it was the same as normal actually" (F, 25 - 34, Belfast)

The key benefit of this scenario was that viewers became more involved in the programme because of the longer *initial* programme period, compared with the current pattern, due to the absence of the 20-minute rule. They believed that they would be far less likely to channel-hop during the first break, as they would be more 'hooked into' the programme:

"The current situation is bad for drama because you don't get a chance to really get into it before you get an advert" (F, 35 - 44, Weybridge)

"It's better than what we normally see because you can get into it more" (F, 45 - 64, Newcastle)

"I preferred that to what we normally see. The ads were more evenly spread and it didn't feel like there were too many of them" (M, 35 - 44, Cardiff)

Other key positives were that the balance of programme to advertising 'felt about right' and that the lengths of the advertising breaks themselves were acceptable. The advertising breaks were short enough to be unobtrusive and not long enough to provide a useful time period for household chores. Viewers would, therefore, be less likely to leave their televisions during the breaks.

On the downside, some felt that the cumulative impact of the programme sponsorship was annoying.

"There's no way that I'd sit and watch ten lots of that! It would drive me mad!" (M, 35 – 44, Ealing)

Some also feared that if this four-break scenario was allowed, then broadcasters might gradually extend the length of the breaks. Viewers are completely resistant to television becoming like that in the US – this was a theme consistent throughout all of the research:

"It'll be the thin edge of the wedge and before you know it it'll be like the States" (M, 35 - 44, Cardiff)

"I just hope that it won't mean we'll get more and more ads and it'll be like the States before we know it" (F, 35 - 44, Ealing)

In summary, participants showed high levels of support for this scenario. They thought it would be acceptable for a wide range of programme genres, including drama, make-over shows, reality programmes, quizzes and voting shows. This type of pattern was deemed suitable for evening as well as daytime viewing.

A few, however, were resistant to change of any kind and were keen to maintain the status quo. These tended to be older viewers. A number spontaneously mentioned at this stage that a revised, more evenly-spaced version of the current ad break pattern (i.e. 3 breaks) would represent the ideal, especially for drama, because there would be even fewer disruptions.

Reactions to increased internal breaks among those who discussed 'The Bill' concept

Those who did not view The Bill were shown the concept (see Figure 3 above).

Although many were positive towards this scenario (having just viewed *Pushing Daises* with five internal breaks) because it presented the viewer with fewer breaks, participants who did not view the scenario still believed that it would *feel* as though there was too much advertising.

In general, perceptions were more negative than the responses of the viewers:

"I suppose it would feel less bad, but it still seems like a lot of advertising to me" (F, 35 - 44, Glasgow)

The concern was reiterated that the UK would become too much like the USA if an extra break was introduced.

Younger participants (18 – 24 year olds) were generally more willing to accepting this scenario in concept form, stating that it would be fine for quiz shows, reality and make-over programmes:

"Some programmes are cut up into four – like these make-over shows, it would be okay for them" (F, 18 - 24, Cardiff)

The rating scale responses for 'The Bill'

After viewing and/or discussing *The Bill* test scenario, participants were each given a questionnaire and asked to complete ratings scales. They were asked to say to what degree they agreed or disagreed with each of the statements listed in the grid below (from 1 'completely disagree' to 7 'completely agree').

A summary of their average scores for each dimension is shown in the following table:

Figure 4 Ratings for *The Bill*

The Bill: agree/disagree rating scales	Viewed	Concept	Total
Base: All workshop participants	144	131	285
The level/amount of advertising felt about right overall	5.38	4.24	4.84
The number of advertising breaks felt about right	5.10	3.96	4.56
The number of ads within each break felt about right	5.15	4.75	4.97
The amount of advertising was acceptable for this type of programme	5.37	4.31	4.87
The amount of advertising was acceptable for this evening viewing	5.30	4.23	4.79
The amount of advertising was acceptable for day time viewing	4.88	4.70	4.79

Average scores on a scale from 1- 'completely disagree' to 7 – 'completely agree'

Average scores were much higher among those who watched the reel than among those who discussed the concept in paper form, ⁸ indicating that viewer *perceptions* of the revised break pattern were more negative than the actual viewed experience.

The general assessment for *The Bill* was one of 'agreement' (mean scores ranging between 4.88 and 5.38 when viewed). Participants were particularly supportive: 'the level/amount of advertising felt about right overall' (average 5.38 when viewed) and 'the amount of advertising was acceptable for this type of programme (average 5.37 when viewed).

Scores were highest among the 25 to 34 year olds (6.00) and the 45 to 65 year olds (5.76).

⁸ It was hypothesised among the team at the start of the project that the viewing experience would draw different responses than the conceptual assessment towards change, which is why this methodology was developed.

9.2 60-minute peak time drama – US series (Pushing Daisies)

Half the workshop participants viewed the *Pushing Daisies* test scenario. This test reel was designed to illustrate both increased break frequency (three internal breaks to five internal breaks) and abolition of the 20-minute rule (which is likely to lead to more evenly-spaced breaks).

The ad break pattern for this scenario is shown in the right-hand diagram below. The diagram on the left shows the current ad break pattern.

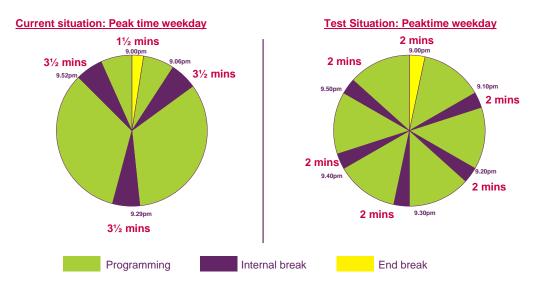


Figure 5 Pushing Daisies break pattern: current versus test

Note: 'Current' situations are for illustration purposes only and will vary dependent on channel, programme, etc Programme length refers to scheduled programme length as per programme listings – not the actual length of programme content

Reactions to increased internal breaks from those who discussed the Pushing Daisies test reel

Viewers were generally negative towards this scenario (compared to The Bill). This was mainly because of the increased number of breaks in the programme – which was immediately noticed. The advertising breaks were said to be placed in 'unnatural' and 'unusual' places within the programme (i.e. there appeared to be no relevance or logic to where they were placed). The balance of advertising to programme also felt 'wrong' for many, and was far too biased towards advertising. It was also noted that the breaks themselves were too short to be worthwhile - i.e. viewers could not complete household chores during them.

Some of this negativity was generated from the programme itself, which did not appeal to many participants and was variously described as being; 'silly', 'strange' and 'annoying' (only a few had actually viewed the programme before the workshops).

Overall, the number of advertising breaks were considered too frequent and, as such, too disruptive to the overall flow of the programme. Viewers believed that they would easily lose concentration if such a pattern were to be imposed. Many indicated that 'in real life' they would probably have channel-hopped during the breaks.

The programme sponsorship was also considered very intrusive due to the cumulative effect of having so many breaks (i.e. a total of 12 sponsorship ads at the start/end of each break). A large number of viewers considered this level of repetition to be annoying:

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"It just seemed as though there were constant interruptions" (M, 35 – 44, Belfast)
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"You notice the sponsorship so much more, it's so annoying" (M, 45 - 65, Birmingham)

On the positive side, many appreciated the longer period of programming at the beginning and end of the show. This was considered far better than the current situation, in which there is a break soon into the initial programme section and just before the end of the programme. Viewers preferred the test scenario in this respect because it gave more opportunity to get into the programme:

"They should definitely scrap that 20-minute rule, you do get into the programme so much more at the beginning" (F, 35 - 44, Glasgow)

Some also appreciated the fact that there were fewer advertisements within each of the breaks, admitting that they would be more likely to sit through some of the breaks if they were shorter.

Support for this scenario was strongest among the 18 to 24 year olds, some of whom preferred shorter, more frequent breaks.

The overall verdict was that this break pattern was far too disruptive for many programme genres, but especially serious drama, or any programme that had a story-line or required a degree of concentration. A minority, especially the under-25s, believed that this pattern would have some limited uses, for magazine-style shows, daytime television, reality shows such as *Big Brother*, or quiz shows such as *Millionaire*:

"For anything that doesn't require a brain really!" (M, 35 – 44, Belfast)

"I suppose it would be okay for daytime telly, or for kid's television" (F, 25 - 34, Cardiff)

"A possibility for daytime television, magazine shows like 'This Morning' voting programmes, makeovers, reality shows but not dramas" (F, 35 – 44, Birmingham)

Reactions to increased internal breaks among those who discussed the *Pushing Daisies* concept

For those discussing *Pushing Daisies* in concept form only (see figure 5 above), the idea of five advertising breaks was completely rejected because it was just too many. Most believed that viewers would lose concentration because of the constant interruptions. They did not feel that it would be a relaxing viewing experience.

Furthermore, many stated that the cumulative increase in programme sponsorship would be excessive. A few also noted that there would have to be far too many pre-break 'cliff-hangers' if this pattern were to be shown within a serious drama.

The key concern was that the scenario seemed to be too like a US-style advertising pattern. This aspect alone would, quite literally, 'turn off' many viewers:

"I'd just switch the telly off and read a book – it would probably be a jolly good thing then!" (F, 35 - 44, Ealing)

"It would destroy your viewing" (M, 35 – 44, Weybridge)

"I'd just have to get Sky+ and record everything" (18 - 24, Cardiff)

The rating scale responses for Pushing Daisies

After viewing and/or discussing the *Pushing Daisies* test scenario, participants were each given a questionnaire and asked to complete ratings scales. Participants were asked to say to what degree they agreed, or disagreed, with each of the statements listed in the grid below (from 1 'completely disagree' to 7 'completely agree').

A summary of the average scores for each dimension is shown in the following table:

Pushing Daisies agree/disagree rating scales	Viewed	Concept	Total
Base: All workshop participants	141	144	285
The level/amount of advertising felt about right overall	3.37	2.50	2.93
The number of advertising breaks felt about right	2.65	2.17	2.41
The number of ads within each break felt about right	4.91	3.27	4.09
The amount of advertising was acceptable for this type of programme	4.08	2.76	3.41
The amount of advertising was acceptable for this evening viewing	3.15	2.64	2.89
The amount of advertising was acceptable for day time viewing	4.49	3.08	3.78

Figure 6 Ratings for Pushing Daisies

Average scores on a scale from 1 'completely disagree' to 7 'completely agree'

Average scores were low, both for the viewed test scenario and the scenario concept, with viewers generally 'disagreeing' with the statements. A few participants gave more neutral reactions (i.e. 'neither agree/nor disagree' score 4) especially with regard to the viewed scenario.

Looking more closely at the viewed ratings, average scores for 'the number of ads within each break felt about right' won the most support, with a near 'agree partly' rating (score 4.91). Scores for this dimension were highest amongst the 45 to 65 year olds (5.39 mean). This age group was, however, the least supportive of this statement when they had considered the scenario in concept form (2.86 mean).

There were more positive reactions to 'the amount of advertising was acceptable for daytime viewing' (once again, highest levels of support were among the 45 to 65 year olds, with a

5.10 mean score) and 'the amount of advertising was acceptable for this type of programme' (4.08 overall mean, 5.07 for the 45–65 year olds/3.30 for the 25–34 year olds).

9.3 Comparing 'The Bill' with 'Pushing Daisies'

Average scores were much higher for The Bill scenario compared with scores for Pushing Daisies on all dimensions. The general assessment for The Bill was one of 'agree partly' (score 5) as opposed to 'disagree/disagree partly (scores 2 and 3) for Pushing Daisies. There was also far less of a difference between the viewed and concept scores for The Bill.

The differences are particularly marked for 'the level/amount of advertising felt about right overall', 'the number of advertising breaks felt about right' and 'the amount of advertising was acceptable for this evening viewing'.

Figure 7	Comparative ratings	- viewed scores

Agree/disagree rating scales	The Bill	Pushing Daisies	Differences
Base: All workshop participants	144	141	141
The level/amount of advertising felt about right overall	5.38	3.37	-2.01
The number of advertising breaks felt about right	5.10	2.65	-2.45
The number of ads within each break felt about right	5.15	4.91	-0.24
The amount of advertising was acceptable for this type of programme	5.37	4.08	-1.29
The amount of advertising was acceptable for this evening viewing	5.30	3.15	-2.15
The amount of advertising was acceptable for day time viewing	4.88	4.49	-0.39

Average scores on a scale from 1- 'completely disagree' to 7 – 'completely agree'

9.4 Overall preferences

When both 60-minute test scenarios had been discussed and compared and contrasted with the current scenario, viewers were asked to complete a final, 'Overall Preference' comparative self-completion questionnaire.

There were two versions of the questionnaire. The first version was administered in Birmingham and Newcastle. This included preferences for the Pushing Daisies test scenario (5 internal breaks), The Bill test scenario (4 internal breaks) and the current situation (3 internal breaks with the 20 minute rule applied). In the final four locations which included Belfast, Glasgow, Cardiff and Ealing, a fourth option was added due to participants requests. This fourth option proposed 3 evenly spaced internal breaks i.e. the current situation, with the 20 minute rule removed. This is referred to as the revised current option in the table below.

Viewer preferences, by location, are summarised as follows:

Prefer:	Birmingham	Newcastle	Belfast	Glasgow	Cardiff	Ealing
Pushing Daisies	-	10%	2%	12%	-	-
The Bill	33%	48%	60%	48%	58%	28%
Current	67%	43%	8%	20%	30%	2%
Revised current			30%	20%	13%	67%

Figure 8 Viewer preferences

An overall average of 49% of those who had been offered three other choice options (i.e. in Belfast, Glasgow, Cardiff and Ealing) stated that they preferred the even four-break pattern of *The Bill*. An average of a third in these locations preferred a revised current ad break scenario. Support for this revised, more even ad break pattern was particularly strong in Ealing.

9.5 30-minute peak time drama – UK series (Coronation Street)

All workshop participants viewed the 30-minute peak-time test scenario showing a recent episode of *Coronation Street*. The test reel contained the maximum number of advertisements allowed in the half hour. The participants were asked to watch the full 30 minutes of programme and accompanying advertisements.

The test reel was designed to illustrate increased break frequency (two internal breaks instead of one centre break).

The ad break pattern for this viewed scenario is shown in the right-hand diagram below. The diagram on the left shows the current ad break pattern. Note that the pie chart displays a full clock hour – the left hand side of the pie displays the 30 minute *Coronation Street* slot.

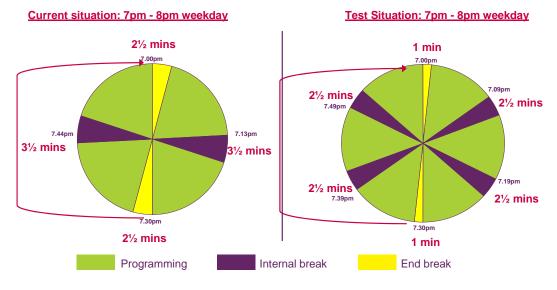


Figure 9 Coronation Street break pattern: Current versus test

Note: 'Current' situations are for illustration purposes only and will vary dependent on channel, programme, etc Programme length refers to scheduled programme length as per programme listings – not the actual length of programme content

Reactions to increased internal breaks in 30-minute peak time (*Coronation Street*)

Overall reactions to this scenario were mixed – and opinions were divided across all age groups and all locations. Those positive towards it described it as 'acceptable' and 'normal' viewing. Some even stated that the programme 'felt longer' than normal.

"It seemed much longer than 30 minutes, more like 20 mins each side of the break!" (F, 45 - 65)

The shorter ad breaks also meant that the balance of ads to programme felt 'about right'. Some participants said that shorter breaks might encourage them to stay put during the advertisements rather than performing their household chores. They did not feel as though they were being saturated by advertisements with long internal breaks.

The male participants were generally more positive towards this scenario, believing that they would probably 'get used to' the different pattern. Many were, however, swift to point out that they rarely watched *Coronation Street*, so this result may have been influenced by a research effect (as a result of the programme selected to illustrate the different break patterns).

"It's like all things, you wouldn't notice it. I'm not really that bothered. I think you'd get used to it" (M, 25 - 34, Cardiff)

But there were also plenty of negative comments, especially from the older viewers and fans of *Coronation Street* (usually women in the over-25 groups), who found the test scenario far too disruptive. They believed that this increased number of internal breaks would 'spoil the flow' and would not be relaxing to watch – and soap viewing, in particular, was considered to be relaxing viewing. More breaks would therefore spoil the viewing experience.

"I suppose it would be okay in an hour long programme, but it's too chopped up for 30 minutes" (F, 35 – 45, Glasgow)

Some participants also felt that it would be difficult to fit two internal breaks into a 'soap' like Coronation Street because there would have to be more / too many cliff-hangers.

It should also be noted that viewers felt that the ad breaks were placed in 'unnatural' and 'strange' positions in the test reel. Once again, complaints focused on the disjointed nature of the viewing experience. While this is clearly a research effect, as the original programme was not shot with this break pattern in mind, it is something that would affect programme writers / directors if new rules came into place which allowed additional breaks.

There was also the reoccurring concern, already voiced several times throughout the workshop sessions, that the programme sponsorship could become very annoying with repeated viewing – and if there were two breaks within a half-hour period the sponsorship ad would be repeated too many times.

Another related concern was the cumulative effect of more advertising breaks over the hour. If there were two half hour programmes running back to back, with similar ad break patterns, then viewing would be too frequently disrupted, spoiling the experience. (Note: this would be similar to the 'five internal break per hour' scenario illustrated by the *Pushing Daisies* test reel – this was fairly universally rejected by all participants).

"It would seem like there were too any breaks for a half-hour programme, especially if there was another half-hour programme just like it straight afterwards" (F, 45 – 65, Ealing)

"I think it would be a lot more noticeable than the 4 (breaks) in 1 hour programme (The Bill)" (M, 18 - 24, Cardiff)

The shorter start and end breaks was also considered by some to be too short to do anything in and not long enough to provide distance between programmes:

"You wouldn't know when one programme had ended and another had started!" (M, 25 – 35, Belfast)

"The minute at the start and end of the programme is useless. We'd miss that start making cups of tea" (M, 45 - 65, Birmingham)

Some participants were simply resistant to any changes to a 'national institution' such as *Coronation Street.* This resistant core tended to be women.

Some of these women did concede that this break pattern may suit some programmes (magazine-style, reality programmes and quiz shows), but definitely not their beloved *Coronation Street*:

"Please don't mess with our Corrie!" (F, 35 – 45, Newcastle)

"This pattern may be okay for The Bill, with all those different crime scenes, but not for our soaps please!" (F, 35 - 45, Birmingham)

Overall, reactions were mixed, with a bias towards maintaining the status quo.

The rating scale responses for *Coronation Street*

After viewing the *Coronation Street* test reel, participants were each given a ratings scale to complete, to show how far they agreed or disagreed with each of the statements listed in the grid below. A summary of their average scores for each dimension is included:

Figure 10Ratings for Coronation Street

Agree/disagree rating scales	Viewed
Base: All workshop participants	245
The level/amount of advertising felt about right overall	3.75
The number of advertising breaks felt about right	3.54
The number of ads within each break felt about right	4.28
The amount of advertising was acceptable for this type of programme	4.01
The amount of advertising was acceptable for this evening viewing	3.83
The amount of advertising was acceptable for day time viewing	4.33

Average scores on a scale from 1 'completely disagree' to 7 'completely agree'

The average scores show that viewers had mixed responses to this scenario. The tendency was to 'neither agree, nor disagree' (score 4) with the attitudinal statements. Viewers were most positive towards the acceptability of this number of breaks being suitable for daytime viewing (4.33 mean). They also felt the number of ads within each break, i.e. shorter length breaks, were acceptable (4.28 mean).

Looking at age differences, it is apparent that these attitudes prevailed across the board, although the 25 to 34 year olds tended to be more supportive, especially for the daytime positioning (4.69) and the number of ads with each break (4.56).

Figure 11 Ratings for Coronation Street

Coronation Street agree/disagree rating scales	Viewed Total	18-24	25-34	35-44	45-65
Base: All workshop participants	245	60	61	62	62
The level/amount of advertising felt about right overall	3.75	3.36	3.98	3.89	3.77
The number of ad breaks felt about right	3.54	2.78	4.08	3.85	3.42
The number of ads within each break felt about right	4.28	4.07	4.56	4.23	4.27
The amount of advertising was acceptable for this type of programme	4.01	3.56	4.43	3.93	4.11

The amount of advertising was acceptable for this evening viewing	3.83	3.44	4.31	3.84	3.71
The amount of advertising was acceptable for daytime viewing	4.33	3.88	4.69	4.06	4.67

9.6 Comparing all three scenarios

The 'four internal break within a 60-minute programme' scenario, as illustrated by *The Bill,* scored highest in terms of agreement across all of the statements – indicating clearly that this was the most acceptable scenario in terms of an increased number of advertising breaks.

The 'five internal break within a 60-minute programme' scenario, as illustrated by *Pushing Daisies*, scored lowest in terms of agreement across all of the statements – indicating clearly that this was the least acceptable scenario in terms of an increased number of advertising breaks.

The mixed responses to the 30-minute programme, as illustrated by *Coronation Street*, sat in the middle of these two sets of scores. Perceptions skewed towards feeling that two internal breaks would be too noticeable and disruptive. But the responses were affected by the programme - *Coronation Street* is considered a national institution and was very popular among many of the participants in this research, particularly the women.

Generally, increased break frequency was deemed more suitable for 'light entertainment' and was considered unsuitable for programmes that contained storylines and/or that required higher levels of attentiveness or concentration.

There was universal approval for the removal of the 20-minute rule; it was generally agreed that the viewing experience would be vastly improved by having evenly spaced breaks.

Figure 12Ratings for all three scenarios

Table : Overall viewed comparisons	The Bill	Pushing Daisies	Coronation Street
Base: All workshop participants	144	141	245
The level/amount of advertising felt about right overall	5.38	3.37	3.75
The number of advertising breaks felt about right	5.10	2.65	3.54
The number of ads within each break felt about right	5.15	4.91	4.28
The amount of advertising was acceptable for this type of programme	5.37	4.08	4.01
The amount of advertising was acceptable for this evening viewing	5.30	3.15	3.83
The amount of advertising was acceptable for daytime viewing	4.88	4.49	4.33

Average scores on a scale from 1 'completely disagree' to 7 'completely agree'

In summary, the key *viewer* recommendations arising from the workshops were:

• abandon the 20-minute rule and peak-time restrictions;

- allow four internal breaks for some 60-minute programmes without a storyline;
- regulate to avoid repetitive sponsorship ads (and review sponsorship minutage);
- maintain three internal breaks for 60-minute dramas, with evenly spaced breaks;
- maintain status quo for 30-minute programmes; and
- regulate to ensure that increased revenue is spent on new programmes.

Annex 1

Sample and methodology

1.1 Fieldwork details

A total of seven whole day (6-hour) deliberative workshops were conducted at central locations within each of the regions of the UK:

- Weybridge, Surrey (pilot day) 20th May 2008
- Birmingham 22nd May 2008
- Newcastle 28th May 2008
- Glasgow 29th May 2008
- Belfast 2nd June 2008
- Cardiff 3rd June 2008
- Ealing 17th June 2008

1.2 Sample details/recruitment quotas

Television viewers attended each workshop and were divided into 4 groups of 10 people. These 4 groups were homogeneous by age and life stage as follows:

- 18 24 years (single/pre family)
- 25 34 years (single/partnered with/without children)
- 35 44 years (single/partnered with/without children)
- 45 65 years (single/partnered empty nesters)

Each workshop sample was representative of age, sex, socio-economic group and ethnicity

Participants were recruited to the following criteria:

- All watched at least one hour of commercial PSB and non-PSB broadcasting per day
- There was a good mix of those viewing daytime and evening television
- Viewers watched a variety of programme genre (movies/dramas, soaps, lifestyle programmes, comedy, quiz shows, news, documentaries, sport)
- A good mix of satellite/cable/Freeview and terrestrial only
- That they watched a wide selection of programme genre

- A maximum of three per group to own a DVR/Sky+, or similar television recording system
- Those who were anti-advertising were excluded from the study (this was in order to engender a constructive attitude towards possible changes to future advertising rules)

1.3 Viewing summary

All participants viewed 1 x 30 minute test scenario - Coronation Street

All participants viewed 1 x 60 minute test scenario - Half at each workshop viewed *The Bill* and half viewed *Pushing Daisies*

All participants discussed 1 x 60 minute test scenario in concept form – Half at each workshop discussed *The Bill* and half discussed *Pushing Daisies*

All participants compared the test scenarios (both viewed and concept) with the current ad break patterns (shown in concept form)

	Workshop 1 & 7	Workshop 2	Workshop 3	Workshop 4	Workshop 5	Workshop 6
Age	Weybridge & Ealing	Birmingham	Newcastle	Glasgow	Cardiff	Belfast
18 - 24	1, 3, (2)	1, 2, (3)	1, 3, (2)	1, 2, (3)	1, 3, (2)	1, 2, (3)
25 - 34	1, 3, (2)	1, 2, (3)	1, 3, (2)	1, 2, (3)	1, 3, (2)	1, 2, (3)
35 - 44	1, 2, (3)	1, 3, (2)	1, 2, (3)	1, 3, (2)	1, 2, (3)	1, 3, (2)
45 - 65	1, 2, (3)	1, 3, (2)	1, 2, (3)	1, 3, (2)	1, 2, (3)	1, 3, (2)

All participants viewed 1 x 30 min test scenario – Coronation Street (code 1) All participants viewed 1 x 60 min test scenario:

Half viewed The Bill (code 2) and discussed Pushing Daisies (code 3) in concept form Half viewed Pushing Daisies (code 3) and discussed The Bill (code 2) in concept form

Annex 2

Discussion guide

2.1 Deliberative Workshop Programme and Discussion Guide

10.30 - 11.00 - Arrival - Coffee - Settling in

Participants arrive (n=40) are checked in, given a name badge and are allocated a table. Here they will meet their group leader and other members of their group (one of four groups defined by age/lifestage)

• Names, family details, occupation, where live

11.00 – 11.10 — Whole Workshop Session One

Introductions & Explanations by Research Team:

- Welcome to workshop and brief introductions
- Housekeeping timings (lunch breaks etc) toilets fire escapes
- Explanation of roles research team and Ofcom
- Explanation of purpose of the day and end goals
- What is expected of them
- Programme details
- Introduce group leaders leaders take their group to the break-out rooms

11.15 - 11.45 - Break-out Session One (30 mins)

Group warm up session: followed by an exploration of current attitudes towards TV ads and behaviours during TV ad breaks - (Pre-task used as a spring-board to discussion)

- Media ownership and usage especially; PVRs, TVs/computers owned/used for viewing programmes – how often viewed, when, where in house (very general- quick discussion)
- General discussion of viewing habits, including;
 - Channels watched (5 main channels (or PSBs) V non-terrestrial channels (cable/satellite/Freeview),
 - o Genres
 - Times of day when view the most/least
- Current attitudes towards TV ads
 - o General comments spontaneous 'top of mind' responses
 - o Likes/dislikes
 - o Favourite ads

- (Refer to pre-task) Typical behaviours during the ad breaks prompt on impact/role of PVRs if necessary
- General attitudes to current levels of advertising
- Exploration of awareness/understanding of any rules/restrictions governing TV advertising (Do not prompt)
- Awareness/understanding of 5 main channels (PSBs) v non-terrestrial (cab/sat/Freeview) TV advertising rule differences (Do not prompt)
 - Are there any differences
 - Why are there differences
- Prompt: any differences between the ad regulations for:
 - Main 5 channels v cab/sat/Freeview channels
 - o Time of day
 - o Programme genre
 - And any perceived difference between the channels in terms of TV ad regulations (Do not prompt)
- General discussion around the understanding of the role of advertising:
 - o Their function
 - Their importance to broadcasters

11.50 – 12.05 – Whole Workshop Session Two (15 mins)

Introductions and Explanations by Ofcom: Ofcom Presentation 1: How Advertising Works, Current Restrictions and Rational Behind Them

Question and answer session

12.10 – 12.25 – Break-out Session Two – (15 mins)

Explore reactions to Ofcom's first presentation

- Initial reactions
 - o Any questions
- Awareness levels any surprises
- Any comprehension issues
- Overall level of approval/disapproval
- Perceived relevance of rules
- Explore attitudes towards rules pertaining to specifics:
 - o Reactions to minutage rules
 - Reactions to frequency rules
 - o Differences between channels, day parts, genres

- General discussion around the relevance of rules/regulations in today's media environment
- What do you think would happen if there were no rules?
- Prompt: what do you think about the differences between the main 3 commercial channels (i.e. PSB channels; ITV, Channel 4, 5) and the cab/sat/ Freeview channels when it comes to ad rules:

12.30 – 12.50 – Whole Workshop Session Three (20 mins)

Ofcom Presentation 2: Changes to the Media Landscape, Challenges, Reasons for Review and Possible Scenarios

Question and answer session

12.55 – 16.30 – Break-out Session Three Explore reactions to Ofcom's second presentation – 12.55 – 13.10 (15 mins)

- Initial reactions
- Thoughts on reasons for the review
- General attitudes towards the possible choices for Ofcom
 - o Do nothing
 - o More advertising including overall ad minutage
 - More internal breaks including frequency of ad breaks
 - Use bar graph handout (from Ofcom pres 2) to explore these issues in depth

Comfort break(10 mins)

LUNCH SERVED: Sandwiches/fruit/drink available for participants to have whilst talking and then viewing first test scenario (60 min – SEE BELOW).

13.25 – 14.25 Viewing Session One – 60-minute scenario (either US or UK drama depending on group) – 14.25 – 14.45 Discuss Scenario (20 mins)

- Group leaders to observe/note take during viewing session of any verbal/non-verbal behaviours
- Initial reactions spontaneous comments
- In-depth exploration of attitudes towards the TV ad reel:
 - o Overall, how did the level of advertising 'feel' too much, too little, about right
 - $\circ~$ How did the overall number of ad breaks 'feel' too many, too few, about right
 - How did the overall number of ads *within* the breaks 'feel' too much, too little, about right
- Comparisons with current ad breaks

- Now compared to what is currently shown how did this level of advertising compare
- Really explore feelings towards the options of:
 - An increased number of shorter breaks versus...
 - Fewer longer breaks
- Explore how the ad break scenario suits/fits in with the programme genre:
 - Suitability for *other* genre
- Explore how the ad break scenario suits/fits in with the time of day programme is shown:
 - o Suitability for other day parts (morning, lunch, afternoon, late night)
- Self-complete rating scales for viewed scenario 7 point scale 'completely disagree' (1) to 'completely agree' (7) on the following dimensions:
 - The level/amount of advertising felt about right overall
 - The number of ad breaks felt about right
 - The number of ads within each of the breaks felt about right
 - The amount of advertising was acceptable for this type of programme
 - o This amount of advertising is acceptable for evening viewing
 - This amount of advertising is acceptable for daytime viewing

** 14.45 – 15.05 Introduce second 60-minute scenario - <u>DISCUSSION ONLY – NO</u> <u>VIEWING</u> (Introduced via hand-out – Ofcom to produce) – Either UK or US drama depending on group (20 mins of discussion time)

Ensure that participants fully understand the ad break pattern of this scenario – get them to imagine that they had just viewed the actual programme and that they must comment as they have done for the previous scenario

- Initial reactions spontaneous comments
- In-depth exploration of attitudes towards the TV ad reel scenario:
 - Overall, how do they EXPECT that the level of advertising would 'feel' too much, too little, about right
 - And how do they EXPECT the overall number of ad breaks would 'feel' too many, too few, about right
 - And how do they EXPECT the overall number of ads *within* the breaks would 'feel' too much, too little, about right
- Comparisons with current ad breaks:
 - Now compared to what is currently shown how did this level of advertising compare
- Explore how the ad break scenario suits/fits in with the programme genre:

- o Suitability for other genre
- Explore how the ad break scenario suits/fits in with the programme genre:
 - o Suitability for other genre
- Explore how the ad break scenario suits/fits in with the time of day programme is shown:
 - o Suitability for other day parts (morning, lunch, afternoon, late night)
- Self-complete rating scales for viewed scenario 7 point scale 'completely disagree' (1) to 'completely agree' (7) on the following dimensions:
 - The level/amount of advertising felt about right overall
 - The number of ad breaks felt about right
 - o The number of ads within each of the breaks felt about right
 - o The amount of advertising was acceptable for this type of programme
 - o This amount of advertising is acceptable for evening viewing
 - This amount of advertising is acceptable for daytime viewing
- Comparative discussion of the 2 x one hour long peak time scenarios. Really explore feelings towards the options of:
 - o An increased number of shorter breaks (i.e. as in Pushing Daisies) versus
 - o Fewer, but longer breaks (i.e. as in The Bill)
- Self-complete rating scale/comments for comparative scenarios preference scale with (brief) reasons

TEA BREAK- COMFORT BREAK (10 mins)

15.15 – 15.45 Viewing Session Two – 30 min 'Soap' ad break scenario - 15.45– 16.10 Discuss Scenario (25 mins)

- Group leaders to observe/note take during viewing session of any verbal/non-verbal behaviours
- Initial reactions spontaneous comments
- In-depth exploration of attitudes towards the TV ad reel:
 - o Overall, how did the level of advertising 'feel' too much, too little, about right
 - \circ How did the overall number of ad breaks 'feel' too many, too few, about right
 - How did the overall number of ads *within* the breaks 'feel' too much, too little, about right
- Comparisons with current ad breaks:

- Now compared to what is currently shown how did this level of advertising compare
- Really explore feelings towards the options of:
 - An increased number of shorter breaks versus...
 - Fewer longer breaks
- Explore how the ad break scenario suits/fits in with the programme genre:
 - Suitability for *other* genre
- Explore how the ad break scenario suits/fits in with the time of day programme is shown:
 - o Suitability for other day parts (morning, lunch, afternoon, late night)
- Self-complete rating scales for viewed scenario 7 point scale 'completely disagree' (1) to 'completely agree' (7) on the following dimensions:
 - The level/amount of advertising felt about right overall
 - The number of ad breaks felt about right
 - The number of ads within each of the breaks felt about right
 - The amount of advertising was acceptable for this type of programme
 - This amount of advertising is acceptable for evening viewing
 - This amount of advertising is acceptable for daytime viewing

Final overall summary 16.10 – 16.25 (15 mins)

And just to sum up before we report back to the whole group,.....

- Overall summary of attitudes to the 3 scenarios:
 - o Which feels right/doesn't feel right
 - Any difference in tolerance/acceptability according to time of day
 - Or genre
- Overall attitude to increased frequency of ad breaks:
 - o Where works best/doesn't work so well
 - Any difference in tolerance/acceptability according to time of day
 - Or genre
- Overall attitude to increased minutage of ad breaks:
 - Where works best/doesn't work so well
 - Any difference in tolerance/acceptability according to time of day
 - Or genre
- Overall group recommendation for feedback session

16.30 – 17.00 - Whole Workshop Session Four

- Individual group feedback (via group facilitator) to whole workshop on attitudes towards scenarios
- Question and answer session
- Summary of whole workshop return to initial objectives for day final recommendations

Thank and close workshop

Annex 3

Ofcom presentations

3.1 Television advertising: Why it is important and what the rules are



TV allows advertisers to reach mass and niche audiences

- Advertisers can reach a particular group by advertising around programmes they like
- Advertisers pay for the number of people who will see their ads
- Some want to 'buy' a mass audience; some want to 'buy' particular groups – men, women, young people etc
- Advertisers can target particular groups by showing ads in programmes they like



Ofcom



Timing is important ...

- The biggest TV audiences are from 6pm to 11pm (peak time)
- A TV advert shown in peak time can reach many more people than a daytime ad
- So TV channels can charge more money for advertising time in the evening, less for daytime ads







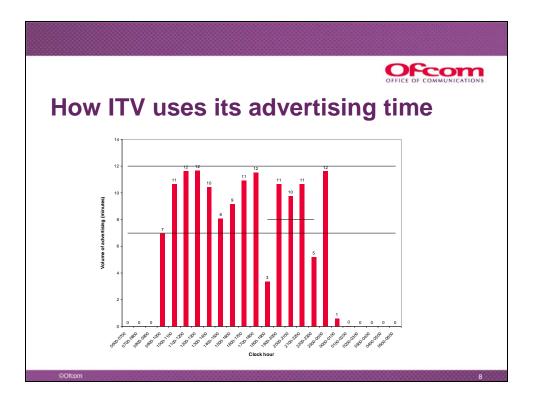


Ad rules for the main channels

itv 1

five

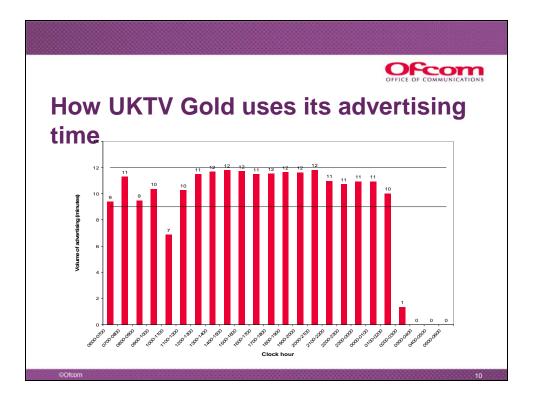
- Stricter than for other channels for historical reasons
- An average of 7 minutes per hour for each hour they broadcast
- Maximum 12 minutes advertising an hour in any one hour (excluding programme trailers)
- Peak time average of 8 minutes an hour (7-9am, 6-11pm), so maximum of 40 minutes between 6-11pm

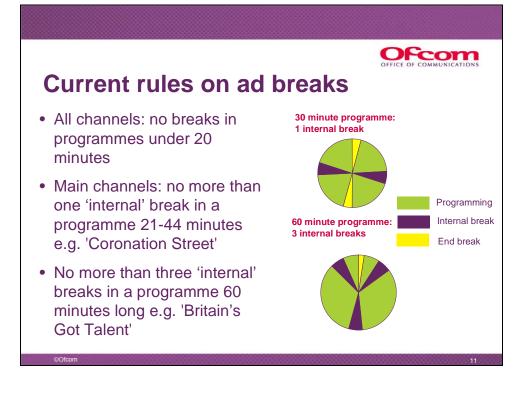




Discovery

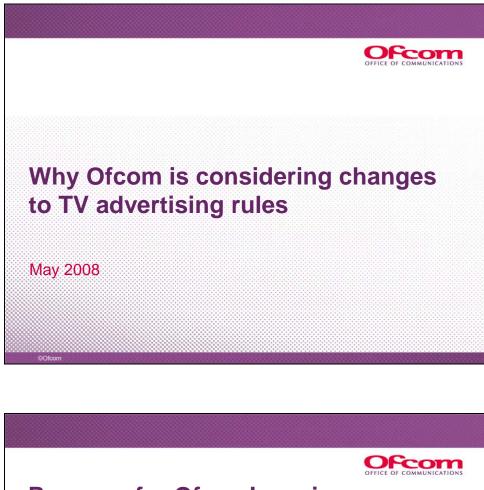
- Maximum 12 minutes advertising an hour in any one hour (excluding trailers)
- Maximum 3 hours of teleshopping





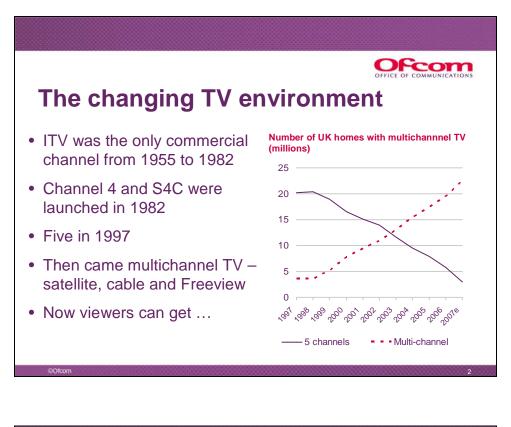


3.2 Why Ofcom is considering changes to television advertising rules

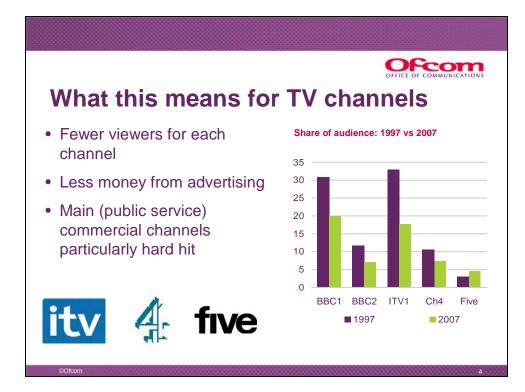


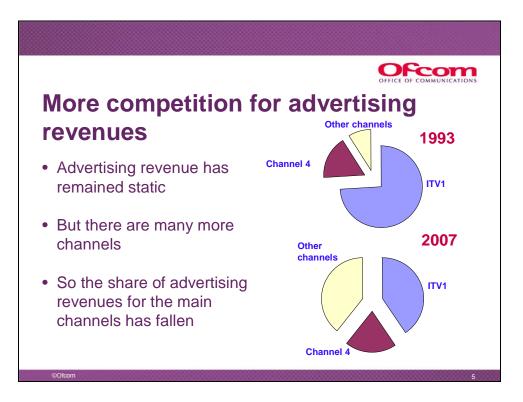
Reasons for Ofcom's review

- New European rules mean that Ofcom could allow more advertising on TV – but we don't have to
- There hasn't been a review of the rules since Ofcom took over – some rules date back to the 1950s
- There have been big changes in television environment. Many more channels are competing for the same advertising revenue
- As part of this review Ofcom wants to hear the views of the general public, broadcasters and advertisers









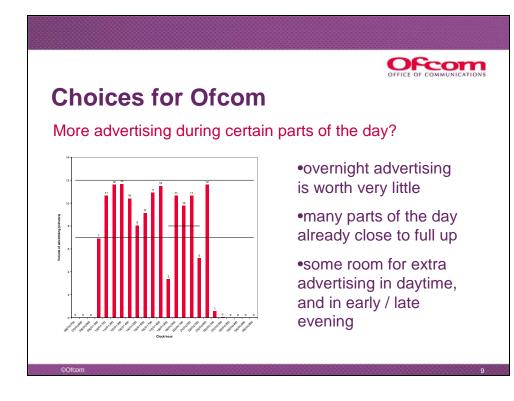
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Choices for Ofcom

Keep rules as they are?

- •No change to viewers' experience of advertising
- •Plenty of small channels to choose from
- •But less money for main channels. Would that mean...
 - gradual decline in amount and / or quality of new programmes
 - more repeats
 - less choice, as channels stop making high cost and less popular programmes





Choices for Ofcom

or more ad breaks?

- More internal breaks (e.g. two in Coronation Street)
- But possibly some more money for main channels (less for others)
- May help to sustain new programming and keep higher cost / less popular programmes for longer