

Question 1: Do you have any comments on the drafting of the proposed amendments to the Broadcasting Code set out in Section 4? Please provide drafting suggestions where appropriate.:

To have such far reaching sweeping reclassification / changes made to the existing format after the number of years this genre of shows have been on air, in such a short space of time is wholly unfair. Considering television is a format solely based on the likes and dislikes of the viewers / consumers, to discuss any substantial rulings, the viewers feelings and comments should be more than important. As far as I can see to this date the Offcom consultation has in no way had any consultation with the viewing public.

Question 2: Do you have any comments on the draft explanatory guidance set out in Section 4? Please provide drafting suggestions where appropriate.:

As per my previous answer: the views of a governing body, in the business of protecting the dedicated viewing public of a news / entertainment medium that seem not at any point to have consulted the public they are protecting, before coming up with any proposal, seems trite. The business of politics and governing bodies so often forgets the public they are meant to be serving to protect.

Question 3: Do you agree that the proposed rules should apply to radio as well as to television?:

Having never worked in the radio format, for me to offer any views on this subject would be unfair to the companies and listeners participating in that format.

Additional comments:

"In Business You Don't Get What You Deserve, You Get What You Negotiate" Chester L. Karrass

Since the beginning of time owning a business means that you are up against a number of outside forces and problems on a daily basis. So when you wake up one morning and you receive news as per the consultation at hand, its the business equivalent of a hurricane sweeping through your city, or passenger aircraft flying into the Twin Towers. It's pretty devastating to say the least. A ruling / suggested ruling made by people who don't own a business who work 9 - 5 upon those who do and work 24 hours a day. Never a nice balance.

Having the read the consultation over and over again, cutting through the pages and pages of words, it seems clear to me that this is about trying to put a few shows that some members of OFFCOM seem to dislike - into a brown paper bag and on the shelf above the top shelf, so to speak.

Television is an entertainment / news medium. Nothing more nothing less.

I see nothing at all that makes me feel comfortable in the idea that this consultation is anything to do with the viewing public. To talk about the percentages of advertising over editorial content, we all know, is basically just a personal viewpoint. There is no way of measuring either of the two realistically.

Editorial is subjective and goes from a music video to a news broadcast etc etc. We would all be the first to admit that to classify a music video as editorial up against a news channel or a documentary would be

fruitless, however to the respective shows viewership, they would both be deemed editorial.

Advertising is subjective it goes from the hardcore pure adverts in between shows, to advertising on shows, however subtle, a person on a talk show naming their favourite restaurant to a premium phone number on a screen offering the viewer the option of calling in.

Soap Operas got their collective name from the amount of Soap adverts that were placed between that kind of show. Television advertising and content, the one cannot survive without the other.

To watch any of the shows in question, one does NOT have to call or text anyone or anything at all. The viewing figures verse the amount of callers and texters is as everyone knows vastly different. IE there is an enormous percentage of viewers, who do simply that - VIEW. That must mean that there is enough editorial content in the shows to sustain that viewership.

I suspect this has more to do with a moral viewpoint than the editorial / advertising ratio.

We live in a country where you can sit next to a person on an a train who is reading a newspaper and as he turns over the first page, viola, a big picture of a topless girl, AND nowadays you are offered the option of downloading more of her topless pics to your mobile phone. You can even do it while you are on the train.

Perhaps it would be pertinent to have readers of that newspaper on trains and other forms of public transport sit in special carriages with blacked out windows.

It's the United Kingdom, 2008 we are as advanced as we have ever been, and here we are quibbling about the sudden notion that after all these years, the ratio of editoril (subjective) to advertising (subjective) is no longer valid.

Perhaps those who work for companies should own a company for a second, while we who own them should work 9-5 and sit back and make decisions that change thousands of peoples lives and then go home without a care in the world.

As far as I am concerned it is the duty of OFFCOM to go some way to proving that this is not just a "let's get those shows off television cause we don't like them" exercise.

If that is the case, then rethinking the entire medium and removing anything that offends anyone might well be the way forward.

If I am wrong, I, or we in this business would like to receive a very clear guideline on the way one measures editorial content.

To decide on a whim after all this time to wipe us off the face of TV or put us in a brown paper bag in a free thinking 1st world society? Well, it's unthinkable.