



**Creativity, Competitiveness and Enterprise in UK Audiovisual:  
New Vision, New Policies**

**December 2009**

**Competition, not shackles, to boost UK audiovisual industries**

**Audiovisual Silicon Valley needed for the UK**

**Liberating public service content from TV**

**No Copyright, no future**

This paper represents the views of Members of the British Screen Advisory Council (BSAC) on the key aspects of Britain's audiovisual industries in which we believe government's regulatory intervention and/or direct support must be focused as a matter of urgent priority. Action is necessary if the UK is to be a significant player in the new media economy rather than just riding on the universal tide of the English language.

The aim of this paper is to encourage government and relevant regulators in imagining strategic, achievable, market-driven regulatory responses to the profound and rapid changes taking place on a global scale at the intersection between technology, markets and culture. These changes originate in the new behaviour patterns enabled by an unprecedented choice of communication services using a variety of established legacy and new digital technologies. The global democratisation in content creation and dissemination has only just begun and the UK must be part of it. In approaching the issues, our overriding focus has been the development of this audiovisual industry's capability as an enterprise sector and important contributor to wealth creation. This capability has to be seen in the context of the global character of the creative content economy and the need to set our challenges at that level. Additionally, we believe audiovisual makes a profound contribution to both reflecting and challenging our national values; it is, and must continue to be, a mirror for our culture.

Audiovisual content (film, TV, internet videos, games, social media) is the single most important driver of growth in the UK's communication sector, which generated total revenues of £51.8bn in 2008<sup>1</sup>:

- the leading internet social network is now used by 19m UK account-holders;
- legitimate individual video streams on the UK's three leading internet audiovisual brands topped 515m last year<sup>2</sup>;
- the UK's computer games industry contributed an estimated £1bn to UK GDP in 2008, and £419m in tax revenues<sup>3</sup>;
- total television revenue was £11.2bn in the past year<sup>4</sup>;
- total spend on television output for the year exceeded £5bn<sup>5</sup>;
- film activities contributed £4.3bn to the economy<sup>6</sup>;
- the media sector as a whole contributed 5.6% of Britain's total economic output last year<sup>7</sup>.

By these measures, UK audiovisual appears healthy and diverse. However, our excellence and competitiveness in these sectors are being challenged daily and on a global scale. Highly qualified creative and technology jobs are being lost to countries where the workforce is now competitively priced, highly educated and able to use the global networked economy to service other industries thousands of miles away. Many of these competitors are actively supported by their governments who divert funds and prioritise aggressive trade initiatives to stimulate high growth in audiovisual content sectors; they regard those as important wealth generators and contributors to tax revenue (e.g. Canada, Korea, Singapore, the US and France). As a result, the UK's pre-eminence in this area is being severely challenged.

BSAC believes the future of UK audiovisual lies in global expansion anchored firmly in domestic creativity and socio-cultural relevance. A light and focused set of government policies and regulations must be designed to help industry meet the challenges head on.

BSAC is well placed to make a decisive contribution to governmental and industry thinking on the key issues which need to be addressed if the UK audiovisual industries are to remain globally competitive. BSAC uniquely brings together business leaders representing all the segments of the traditional audiovisual value chain as well as pioneering sectors in the new online economy. BSAC has the ability to propose innovative policy solutions which take into account a wide variety of perspectives. The working group responsible for the report was chaired by Malcolm Wall and comprised; Jolyon Barker, Ajay Chowdhury, Fiona Clarke-Hackston, Mark Cranwell, Carolyn Fairbairn, Stephen Garrett, Rupert Gavin, Fred Hasson, Roly Keating, Tom Loosemore, Bertrand Moullier, Jon Pettigrew, Adam Singer and Tim Suter. A list of BSAC Members can be found at [www.bsac.uk.com](http://www.bsac.uk.com).

## Transformational business impacts – a kaleidoscope

1. Technology is driving a profound transformation in the production, delivery and patterns of consumption of audiovisual content. This transformation is replacing legacy models in both public service and the private sector, with new business models and new forms of informal, user-generated media and content, not all of which are driven by the imperative to monetise. Many of the assumptions on which our industries have been established are becoming irrelevant and obsolete, challenging all of us to adapt. Below is an impressionistic reminder of the magnitude of the current change:
  - it took radio 38 years to reach 50m viewers in the US; it took TV 13 years; Facebook added 100m worldwide users in less than 9 months<sup>8</sup>;
  - the leading video streaming site, YouTube, now boasts 300m accounts worldwide, with 120m videos available and 200m viewings per day. 80% of the content is uploaded by ‘amateurs’<sup>9</sup>;
  - international video content web aggregator Hulu boasted 63m streams in April 2008; one year later, the figure had risen to 373m;
  - the VoD market was worth \$156m in the US and \$38m in Europe last year, and is set to grow ten-fold by 2013, to reach \$1.2bn in the US alone<sup>10</sup>;
  - 70% of 18-34 year old Americans have watched TV on the web; only 33% have watched it on DVR or TiVo<sup>11</sup>;
  - UK consumers spent an average of 25 minutes a day on the internet in May 2008, a nearly three-fold increase on the same period in 2004<sup>12</sup>;
  - streaming traffic on the BBC iPlayer reached 275m video streams (750,000 per day) in 2008, with 4oD adding another 150m and Virgin Media 100m<sup>13</sup>;
  - the UK’s highest earning worldwide blockbusters are not television or film: LittleBigPlanet, Grand Theft Auto, Lemmings or Tomb Raiders, all of them games, all of them conceived by British developers, routinely achieve 9-digit sales figures across the globe. Since its first iteration in 1997, over 52m units of Grand Theft Auto have been purchased – the UK appears to be on course to overtake Japan in gaming sales in 2009, with a predicted market value of £4.77 by year end<sup>14</sup>; the export value of TV-based UK-originated games was £220 million last year;
  - social gaming has become a major driver in the development of social networks on the internet: Zynga, a gaming group available to Facebook’s

250m worldwide users, boasts 66m active users monthly – the estimated global value of social gaming is now \$1bn per annum;

- although the volumes of units sold remain high the DVD market has begun to plateau in revenue terms, with sales falling from \$24bn to \$22bn in the US over one year. Sales of high-priced Blu-ray disc were not sufficient to make up for the decline in traditional DVD value<sup>15</sup>;
- viewing to the core linear channels of the traditional TV networks is in slow decline as more consumers diversify their use of audiovisual platforms, mixing network TV with digital channel viewing and extending into interactive media across a range of internet platforms. Digital TV take-up reached 89.2% at the end of the 1<sup>st</sup> quarter 2009. Whilst the average viewing per head, per day remained stable over the past 6 years, the share of network TV viewing in all homes shrunk from 77.7% in 2002 to 60.8% during 1<sup>st</sup> quarter 2009<sup>16</sup>;
- total UK advertising revenues from the internet were £2.9bn in 2007, against £200m in 2002, and grew by an average of 71% in the five years from 2003-2007. Internet's total share of UK advertising has grown from 5% in 2004 to 19.5% last year<sup>17</sup>;
- 90% of US TV consumers who can skip adverts through TiVo or DVR, choose to do so<sup>18</sup>;
- none of the major aggregators in the online world come from the UK. Google, Microsoft, Amazon, Ebay, Facebook, Twitter, Hulu, i-Tunes, Sony, Nokia and Skype, to name a few, are all foreign brands.

### **Factors of stability in legacy business models**

2. Within the overall dynamics of technological and market transformation, aspects of the legacy business models evidence factors of stability. This suggests that they may occupy a lasting place in the future ecology of audiovisual, alongside the new models:
  - theatrical exhibition has shown considerable resilience as the premiere market for films. Future prospects for this market are bright, due to a combination of technological factors (high-grade digital projections, 3-D, etc) and new and future venues offering an enhanced experience to the viewer;
  - patterns of traditional linear television viewing are likely to be changing relatively slowly over the next decade. Recent UK research<sup>19</sup> forecasts linear UK TV representing 89.5% of all audiovisual viewing hours in 2009 shifting down to a still considerable 72.4% by 2020<sup>20</sup>;

- revenue for linear broadcasting overall will see the relative decline in advertising being in part compensated by the ongoing growth in subscription packages: UK TV subscription revenue grew by 5.7% to £4.32bn in 2008, while total net advertiser revenue was down 3% to £3.47bn<sup>21</sup>;
- according to IPA, advertising on free TV will continue to be a significant component in the new marketplace, alongside the new media iterations;
- the demand for high quality UK-produced audiovisual content will continue for the foreseeable future (especially high-end drama/films). This will co-exist with the development of cost discontinuities in other content areas, with producers and home users taking advantage of technology to produce some genres at a fraction of those incurred under the legacy model (monopolistic network commissioning). The rise of the new audiovisual supply will eventually affect the value of traditional audiovisual supply;
- history shows us that old media never dies, it just loses its primacy. These factors of stability/inertia need to be considered when imagining the future framework of policy.

### **Towards a new UK policy framework for Audiovisual**

3. The new media environment raises questions across all areas of the audiovisual landscape, from whether and how to maintain a supply of public service content, to what kind of a copyright and related rights' framework may be justified in an era where the falling cost of audiovisual production encourages the rise of the individual entrepreneur.
4. The challenge for government is in how to adopt an integrated and flexible approach to regulation and incentives. This approach needs to take into account both the profound changes already apparent in people's behaviour, and their long-term coexistence with older, stable patterns of traditional media consumption and use. It also calls for a more dynamic framework for audiovisual policy-making by government and executive agencies; it should be economically-driven, coordinated and inter-departmental.
5. We need new working principles to ensure that fairness, competition and transparency can support a non-hierarchical and multi-directional media environment. We need a framework which enables the entrepreneurial potential of this new economy to be fully tapped by those with the talent, skills and drive to create the sustainable global content businesses of

tomorrow. We need a framework which does all this whilst promoting the freedom of everyone to access content as easily as possible, and to be a participant in the global sharing of creative ideas, if they wish.

6. From these observations **four key prescriptions for policy making/regulatory intervention, emerge**. These are the prescriptions which BSAC believes to be most important and urgent in establishing an enabling set of public policies:
  - **a new, streamlined audiovisual competition framework**
  - **a new, focused and cohesive investment in enterprise and skills**
  - **a bold new approach to public service content in the pluralistic broadband universe**
  - **a copyright regime that facilitates decentralised creativity and access to content in the broadband ecology.**

### **The Competition framework**

7. BSAC believes the mechanism designed to promote competition and fair trading in the UK audiovisual sector can no longer deliver the speed and flexibility which the global wired economy requires of entrepreneurs and businesses. The regulatory apparatus designed for an era of monolithic provision is obsolete, and is not able to support growth in a globally-integrated marketplace.
8. Our national competition framework should ensure that our media industries can perform efficiently in a global free market economy. In order to do so, it must arbitrate to prevent monopolistic practices, unfair practices and abuse of dominant position whilst also avoiding a dampening effect on UK companies with the ambition to become global players.
9. The existing framework is uncoordinated and often fails to understand the changing forces of media provision. One of the main problems with the current approach is that it regulates the behaviour of undertakings according to static assumptions about the marketplace. A regrettable example is in the local and regional newspaper industry; this sector is now in sharp decline in part due to overly rigid rules that focused on the provision of print, or radio, or television, rather than realising that in a converged world these distinctions cease to exist. This attitude prevented scale formations that may have been the only feasible way of ensuring news supply at local level.

10. The definition of what constitutes a relevant market in audiovisual fails to take into account the constantly evolving and increasingly global nature of the business, as enabled by broadband technology. Substantive assessments of market impact are not underpinned by dynamic assumptions as to how competition is likely to work in tomorrow's audiovisual markets: unlike in the analogue past, future monopoly positions are likely to be at best temporary. Preventing anticipated foreclosure effects or bottlenecks from companies with strong market positions and trying to control these effects at source, may not be the most effective solution. It keeps potential investors away, which, in turn, hampers technological development.
11. The current mechanism also relies on a narrow interpretation of the public interest. In the networked economy small and large scale enterprises each have respective advantages. In and of themselves, undertakings of a certain size and structure who may reduce competition to a degree, are not always necessarily acting against the public interest. In the early 1990s, the EU Commission allowed the US film studios' distribution consortium UIP to operate in spite of the fact that it was in a position to dominate markets in some parts of Europe, and reduce competition in the film distribution market. The reason for this decision was that the European cinema exhibition infrastructure was, at that time, plagued by obsolescence and under-investment to the consumer's detriment. The Brussels regulator therefore took the view that the public interest impact of UIP's cartel effect (e.g. its virtuous effect on the redeployment of a healthy cinema infrastructure in Europe), far outweighed its transitory negative impact on the overall competitive picture in the film industry of the time.
12. The immediate restrictive effects on competition of allowing the emergence of new scale monopolists in broadband content aggregation and supply, may not always be significant enough to justify doing away with the advantages they may bring the UK consumer in the long run. Such consolidations may encourage economies of scale, competitive pricing, and wider choice; and will ensure UK brands can compete globally. Market concentration does not always stifle the media sector and is not automatically against the public interest. The current approach to the public interest test in UK competition law is too conservative in this respect and its use to restrict the development of larger audiovisual content concerns may be to the long term detriment of the consumer.
13. The days of top-down regulation based on a static sense of what our society needed, are past. It must be replaced with a light, yet still robust, bottom-up regulatory framework with a small number of core laws and a light touch regulator able to reach decisions quickly. In particular, government now has an opportunity to make the system forward looking by developing a new definition of the public interest, based on the

recognition that scale is not automatically inimical to the consumer or antithetic to plurality of choice, but often supportive of both.

### **Principles for a new Audiovisual Policy – Competition**

- a) The UK’s Enterprise Act must be reviewed as a matter of priority, a new definition of the “public interest” must be adopted. The definition must aim to be more flexible, so as not to automatically discourage the emergence of larger UK content companies as potential drivers of wider consumer choice, innovation and plurality in the new broadband democracy.
- b) Our industry needs a fast-track, unified approach to decisions regarding mergers and cases of abuse of dominant position.
- c) Media mergers must be subjected to a public interest test as a matter of course. Currently, such a test is only applied to a media undertaking according to a discretionary decision by the Secretary of State.
- d) Media ownership rules must be redefined to take into consideration fundamental changes in consumer behaviour in accessing and using news and other audiovisual content.
- e) Ofcom under its current structure and remit is no longer fit for purpose. It needs to be reconstituted in order to become capable of delivering a rapid response to evolving markets as an economic regulator; its intervention must be based on an in-depth understanding of the whole audiovisual economy, not just on broadcasting.

## **Enterprise and Skills**

### **I. Enterprise**

- 14. Capital and education. These are the twin, interlocking principles which sustain our audiovisual content industries. Together, they foster a climate of innovation and an enterprise culture without which we are fated to lose our global competitiveness in audiovisual.
- 15. The US has had Silicon Valley, Hollywood, Motown and other centres of creative/technological excellence. These success stories are based on virtuous circles in which the success of the enterprise sector generates surpluses which can be channelled into centres of educational excellence and back again.
- 16. At this juncture, the UK is in danger of losing sight of this successful dynamic and replacing it with a sterile culture of dependency on the public sector. Current policies simply aren’t working. They are failing to stimulate significant and lasting economic growth in our sectors by

spreading resources too thinly through failing to focus capital resources in geographical areas and business sectors with strong growth potential.

### **Principles for a new Audiovisual Policy – Enterprise**

- a) Policies for the growth of audiovisual enterprise must be delivered through a goal-orientated partnership between the private and public sectors. The terms of this partnership need to be redefined, on the basis of an integrated, UK-wide policy for economic development and global competitiveness;
- b) Government and the private sector must focus resources where the chances of generating a small number of nodes of economic success are greater.

## **II. Skills**

17. The future of Britain as a competitive audiovisual content country is challenged by an ageing workforce and the development of alternative, low-cost centres of production and post-production services in Eastern Europe and further afield. The equation is simple: as we can no longer compete on price, it is all the more essential that we should compete on our skills. To do this a substantial re-orientation of our educational resources is urgently needed.

### **Principles for a new Audiovisual Policy – Skills**

- a) Training and education should be primarily targeted at those skills areas where future growth appears sustainable given our audiovisual industries' inherited strengths and weaknesses.
- b) Training and education should be vocationally relevant, and tailored to the industry's skills needs and shortages. We need a national agenda which meets the demands of skills acquisition in the context of lifelong learning.
- c) The focus must be on developing entrepreneurship amongst graduates and trainees, through exposure to the reality of an increasingly competitive and technology-dependent business. Our future audiovisual competitiveness depends on our producing a generation of "creative technologists". We need a national strategy which starts at secondary school level and continues in tertiary education.

### **Plurality in the wired world – whither public service content?**

18. One of the most salient issues confronting the public, government and the industry today is the future of Britain's public service content. Over

the past 60 years, our country's audiovisual industry has sourced much of its innovative ideas from the stable bedrock of public service institutions characterised by spectrum scarcity and high costs.

19. In the middle of today's technological shift however, the competitive market dynamics required to encourage innovation and risk taking can conflict with the oligopolistic structure of old public service media. On the other hand, the brand advantage built up by the public service incumbents and their still extensive range and impact represent valuable strategic capital for public service content in the transition towards a multi-platform audiovisual ecology as the public know and trust traditional public service providers as guides into this future. There is a role to play for legacy public service institutions in both creating and generating awareness of relevant content across the internet and facilitating access.
20. The notion that public service would continue to be delivered solely through a small number of linear broadcasting incumbents is over. With more outlets for people to choose from, and the proliferation of user-generated content such as Wikipedia, and of public-service-type content on YouTube and others, the overall content ecology in delivering public service outcomes become more important than the fate of specific legacy institutions. The assumptions that underpin traditional public service content must be re-examined. Future pathways for public service provisions should encompass all technologies and platforms that will be everyone's broadband experience. The incumbent PSBs should be encouraged, therefore, not simply to sustain their existing models but to use their still prominent position and resources to drive innovation and take up of new digital services.
21. BSAC is aware of the potential dangers of disaggregating content identified as public service from mass appeal entertainment, such that public service content becomes all medicine and no sugar. The risk to be managed in the transition from oligopolistic public service media to decentralised public service content, is that much of that content would cease to be supported by old media's brand power and capacity for cross-promotion. Public service content will have to join in the global competitive dynamics of the new "economics of attention" or else face marginalisation. That said, it will slowly become harder to justify public money on mass appeal entertainment, assuming the commercial outlets from which entertainment is sourced, increase their investment in original UK content.
22. Currently, there are a reported 17m people in the UK who are not online, 6m of whom are categorised as economically disadvantaged. Not only is there a moral and social imperative to include these people in the advances in the digital economy, but doing so will open up new markets

for audiovisual media and ensure equitable access to public service content.

### **Principles for a new Audiovisual Policy – Plurality**

- a) A new policy for public service content should encourage the public owned public service incumbents to provide and signpost a range of public service content through relevant networks, portals and search engines, in order to avoid a shrinking of public service content's impact on society and culture.
- b) The roll-out of universal broadband infrastructure in the UK must be a priority. This is a central policy tenet of the Digital Britain report. Today, universal availability of certain content regarded as public service has to be premised on universal broadband access; it can no longer be confined to traditional broadcasting. Universal access is the best guarantee that ease of access to public service content will be guaranteed to all citizens as legacy media ceases to be predominant.
- c) New analytical tools are needed to measure and assess both the quantum and diversity of content that could be classified as "public service", from all platforms and outlets, including social networks and websites catering for specific tastes and interests. The measure is no longer the mass audience of a given moment but the number that are influenced over time. The new forms of 'viral' iteration of content in broadband internet must be measured and understood.
- d) The resulting data must be used by government to make informed, strategic decisions about the generation and supply of public service content, based on a clear picture of what is being offered, what is being used and where maximum amount of public value can be delivered within the public service system. Against that background, government could assess accurately the nature and scope of public sector contribution and the appropriate level of any necessary support.

### **Copyright and related rights**

23. BSAC believes that the exercise and enforcement of copyright and related rights will be a vital ingredient in ensuring the future success of Britain's creative industries. Enforcement must be robust, consistent and whilst it must be directed as a priority against those broadband users who seek commercial gain from illegal downloading and redistribution, it should also extend its reach to most forms of illegal reproduction and redistribution unless they are related to exceptions to copyright.

24. In the audiovisual sector, the scope and application of copyright has never before been challenged to the degree that it is today. Under the old

regime, characterised by high capital costs and the need for a concentration of specialised skills, the functions normally associated with the exercise of exclusive rights, such as fixation, reproduction, display, distribution and making available to the public, were largely the preserve of corporations large and small. Today however, all these functions are available to any savvy home computer or user with a broadband connection and a digital video camera.

25. We also believe that the legislative and enforcement framework should evolve, to reflect those changes and the growing expectation of being able to access any content anytime, anywhere. There can be no doubt that those countries which will surge ahead in reforming their copyright framework will gain a substantial competitive advantage.
26. However, a radical roll-back of the protections and incentives afforded to creators and distributors of content – as advocated by some interests - is not the answer to meeting legitimate consumer expectations in the digital era; doing so would risk breaking down the most important motivational engine for creation of new original content and compromising the economic viability of audiovisual.
27. Redefining the copyright framework requires making sure that the balance at the core of our copyright legislation between exclusive rights (incentives to creativity and rewards for creators) and the public interest (ease of access to works by the public) is adapted to the greater capability for exchange of content enabled by broadband internet.
28. The multiplication of access points permitted by broadband internet, combined with the sharp decline in the marginal costs of distribution, is putting pressure on a licensing regime designed largely for the bygone age of the physical print or disc. A fresh look at the rights clearances' regime needs to address both the need for a more streamlined and expedient process and the development in recent years of "licensing-light" formulas which, though based on copyright, give creators and users an especially flexible framework, conducive to creative exchange, quotation and other derivative uses.
29. Encryption and DRM technologies must remain key enabling tools in the development of new legitimate online content business models. These technologies; however, should not be used to obstruct the exercise of exceptions and limitations or access to works in the public domain.

## Principles for a new Audiovisual Policy – Copyright

- a) Enforcement of copyright and related rights must remain the utmost priority for government and industry – content theft is the largest threat to the competitiveness of UK audiovisual in the long term; it must not be tolerated.
- b) Government must continue its efforts to bring about active cooperation between all stakeholders, including ISPs, with a view to enabling legitimate peer-to-peer file exchanges on broadband internet, for the benefit of consumers, network providers and creators of content. ISPs are not mere conduits for content but proactive partners of creators and aggregators, with a shared interest in supporting quality legitimate services. Government is justified in acting as a facilitator of this process.
- c) New educational initiatives must be designed to present copyright as a positive tool which can benefit everyone from the “amateur” video maker seeking to monetise her work, to the new media entrepreneur hoping to build an IP-dependent asset base.
- d) The UK’s licensing regimes must be reviewed to allow for requisite flexibility and global demand without undermining rights holders interests. This must be an industry-led initiative, with government providing appropriate support.
- e) Government must play an active part in supporting the industry’s experimentation with new business models, which must include supporting our ability to use encryption and DRMs as tools to enable and promote legitimate online content services.
- f) Government must see copyright as a social compact between creator and society, and ensure “fair use”. A print literate society has a right to quote, so an audiovisual literate society should also be able to quote.

### End - Final December 2009

<sup>1</sup> Communications Market Review, Ofcom, August 2009

<sup>2</sup> Communications Market Review, Ofcom, August 2009

<sup>3</sup> Letter to Lord Mandelson by Tiga CEO Richard Wilson, 11<sup>th</sup> March 2009

<sup>4</sup> Communications Markets Review, Ofcom, August 2009

<sup>5</sup> Communications Markets Review, Ofcom, August 2009

<sup>6</sup> UK Film Council Annual Report 2008

<sup>7</sup> *Creative Britain: New Talents for the New Economy*, 2008

<sup>8</sup> [www.socialnomics.com](http://www.socialnomics.com)

<sup>9</sup> [www.socialnomics.com](http://www.socialnomics.com)

<sup>10</sup> Screen Digest

<sup>11</sup> [www.socialnomics.com](http://www.socialnomics.com)

<sup>12</sup> Communications Markets Review, Ofcom, August 2009

<sup>13</sup> Communications Markets Review, Ofcom, August 2009

<sup>14</sup> MCV forecast: <http://www.mcvuk.com/news/33080/UK-games-market-to-overtake-Japan-in-09>

<sup>15</sup> European Audiovisual Observatory, Focus – World Market Trends, 2009

<sup>16</sup> Communications Markets Review, Ofcom, August 2009

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<sup>17</sup> *UK Internet Trends*, Enders Analysis, June 2009

<sup>18</sup> [www.socialnomics.com](http://www.socialnomics.com)

<sup>19</sup> *The Economics of UK TV Content Supply – Challenges and Opportunities to 2020*, Oliver & Ohlbaum Associates, May 2009

<sup>20</sup> Oliver & Ohlbaum

<sup>21</sup> *Communications Markets Review*, Ofcom, August 2009

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