



Ofcom's strategy and priorities for the promotion of media literacy: Response from the Satellite and Cable Broadcasters Group

The Satellite and Cable Broadcasters Group (SCBG) represents the interests of a wide variety of channels operating in the commercial multi-channel sector. Its members are responsible for more than 70 channels in the UK and in addition broadcast many more services from the UK to continental Europe and beyond. SCBG members collectively broadcast hundreds of thousands of hours of programming each year, though most channels remain highly targeted with audience shares ranging from less than 0.01% to 2% of digital viewers.

1. Limited evidence offered in support of a common labelling system.

- 1.1 SCBG supports Ofcom's proposed role in providing leadership and leverage to promote media literacy. We endorse the intention to undertake further research on existing levels of literacy and the attractiveness as well as practicability of different schemes for its promotion, and note that this is consistent with Ofcom's stated intention to be an evidence-based regulator. We note also that in paragraph 33 of the consultation document Ofcom states that it needs to "*develop an evidence base of research to identify the issues, to direct our work and inform progress towards achieving our goals*".
- 1.2 In the context of this stated intention, however, we are concerned at the very limited amount of research and other evidence which is provided in support of the statement in paragraph 64 of the consultation document that Ofcom "*will challenge the industry to consider creating a common content labelling (information) scheme*". We do not consider that research cited (by the Netherlands Broadcasting Corporation, the BBFC and the BBC) provides a sufficiently solid basis of evidence on which to proceed. Furthermore, Ofcom has also failed to make all research available in full, thereby denying the opportunity for comment.
- 1.3 We believe, therefore, that rather than challenging industry to consider a common labelling system at this stage, Ofcom should instead seek to

develop further its evidence base of research, working with stakeholders in order to reach a consensus on what the best (and objectively justifiable) approach should be. This may or may not involve a common labelling system.

2. It is already in broadcasters' commercial interests to make their customers aware of the nature of content on offer

- 2.1 Ofcom asserts that a content labelling system would address the potential for confusion in a converged world, and that there is a need for viewers to become more “active” and to know more about the nature of programmes. Yet there is little evidence offered to back this statement up. Indeed, our experience is that broadcasters are already highly customer-focused, offering a wide range of different content and services designed specifically to meet the needs and expectations of viewers. They also devote considerable resources to ensuring that viewers understand what is on offer.
- 2.2 From the consumers’ point of view, they have chosen a multi-channel environment in order to enjoy the increased choice that is offered to them, and are commonly able to select viewing environments that reflect their particular tastes or interests. Their expectations of multi-channel viewing are not the same as those for the traditional mainstream terrestrial channels.
- 2.3 It is also the case that a significant number of technical steps have already been taken by industry to enhance the media literacy of viewers. Electronic Programme Guides, for example, enable viewers to select programming in a variety of different ways, and offer information about each particular programme. There are also facilities available which enable viewers to restrict access to certain types of programming.

3. Limited complaints

- 3.1 The majority of viewing in multi-channel homes is now to non-terrestrial channels, yet Ofcom has estimated that over 90% of standard complaints concern the terrestrial channels. This reflects a high degree of viewer satisfaction, based on different expectations and an opt-in approach to viewing that is characteristic of the multi-channel world. Multi-channel viewers already receive a significant level of “clear, accurate and timely information” about a programme’s content. While Ofcom’s view is that the potential for offence is great, this does not necessarily appear to be the case with multi-channel viewing.

4. Cost implications

- 4.1 The introduction of a content labelling system might have a substantial cost in terms of revenues, staff time and technology. Furthermore, Ofcom should not underestimate the practical difficulty of selecting descriptive labels for programmes. For broadcasters relying on a high level of acquired programming, in particular, the process of applying descriptive labels would not only be time consuming but would potentially create conflict with suppliers.

- 4.2 When undertaking further research on a common labelling system, therefore, Ofcom should consider such potential cost implications and ensure that it conducts a full Regulatory Impact Assessment of its proposals. Only in this way can any proportionate balance be struck between the costs and benefits of such a policy.

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