



Stewart Gandy
Product Placement Consultation
5th Floor
Department for Culture, Media and Sport
2-4 Cockspur Street
London
SW1Y 5DH

ppconsultation@culture.gsi.gov.uk

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Consultation on Product Placement on Television November 2009

AIME Submission

AIME (www.aimelink.org)

AIME is a UK based not for profit trade association that promotes excellence in the Interactive Media and Entertainment industry.

We uphold our Code of Ethics and Core Values to create an environment of consumer trust and industry confidence within which our members' commerce can grow. We are committed to furthering the interests of Interactive Media and Entertainment through the regular exchange of information and communication throughout the value chain, effective engagement with regulators and legislators and the presentation of a successful industry image to media.

We are the only trade association with membership across all elements of the interactive media and entertainment value industry chain and our membership represents in excess of 90% of annual industry revenues.

We welcome the opportunity to respond constructively to this Consultation on product placement on television although we will restrict our response to generally supportive comments regarding our area of prime concern which is interactive or participation TV.

AIME promotes and abides by the philosophy that consumers who are accurately and openly informed of the nature, content and cost of participation in an interactive service experience are perfectly placed to exercise their freedom of choice and thereby enjoy the most effective form of consumer protection.

General

As the medium of television has become ever more competitive and difficult to finance with traditional business models it is imperative that alternative commercial revenue models are explored and exploited for the future, and Product Placement offers clear opportunities for

new revenues. For this reason AIME is supportive of the proposition to permit Product Placement on television but with appropriate safeguards.

As stated in the introduction it is the base philosophy of AIME that consumers be fully informed to understand the nature of their interactive entertainment experience and we would expect similar safeguards to be employed for Product Placement in television programmes. AIME would expect this to be achieved through the normal process of public consultation for a suitable Code of Practice and supporting guidance, reflecting the requirements of the EU AVMS Directive, to be supervised and applied through the offices of Ofcom as statutory regulator for Broadcast TV.

Such safeguards, AIME believes, are necessary to preserve viewer trust and editorial integrity and to ensure the healthy development of the popular interactive and participative TV entertainment services market in the UK in to the future.

Statement of Representation

AIME confirms that this response has been compiled following a process of appropriate group discussions. A list of our members may be found at www.aimelink.org/currentmembers.aspx

The views expressed in this response are a fair representation of the views held by the responding AIME membership. Individual members are actively encouraged to submit their own independent views as they deem fit and at their sole discretion.

If any clarification to our response is required, or if we can be of any further assistance, please contact Zoe Patterson +44 (0) 8445 828 828 or zoe@aimelink.org

Sincerely

Toby Padgham
AIME Secretariat