



To:
Video Games Classification
Department for Culture, Media and Sport

**Video Games Classification: a consultation
Response from Electronic Arts**

As a member of ELSPA, and as the world's leading interactive entertainment software company, we fully support the ELSPA submission to the Byron consultation outlining why PEGI is the single, viable and best suited content age rating system for video games in the UK.

We respectfully request your full attention to the detail outlined in that submission.

Games are the fastest growing segment of media today. The influence of interactive entertainment is truly mainstream. With such a rich set of diverse offerings for all tastes and age groups, our industry is having an enormous impact on modern day popular culture. EA, and our industry as a whole, take very seriously that responsibility and are committed to PEGI as the best content age rating system to help ensure the right content makes it way to the right audiences.

Every industry indicator points to a dramatic expansion of game play and game purchase to online environments. At EA, we expect to see a significant portion of our global revenue coming from online gaming activity in the coming years, across areas such as digital downloading of content, online subscriptions to gaming services, the purchase of gaming items and content through online microtransactions, and mobile gaming. We see ahead an unprecedented amount of content being made available online that will give consumers more fresh offerings than ever before, in an easy and accessible way.

In that context, where developers and publishers are providing millions of pieces of online content and new and innovative online activities and services to audiences of all ages – and this globally – the only viable age rating system is one that combines an effective content rating system with a complementary code to ensure that online offerings and practices are age appropriate and consistent with content ratings. PEGI provides that with its PEGI Online Safety Code and program ("PEGI Online").

PEGI Online puts the responsibility on game publishers, who are uniquely placed to understand and to accurately assess the appropriateness of their online content and services according to the very stringent guidelines set by PEGI Online. It is impossible to expect any outside classification body to rate the sheer quantity of online material. Such a body will struggle to cope not only with the volume of content needing assessment, but equally to keep pace with what is a fast moving, quickly evolving relationship between game maker and consumer. Game makers best understand the risk of very stiff penalties should there be a breach in the self assessment, or of the PEGI Online Safety Code.



As is EA, the vast majority of game publishers and retailers that operate in the UK are multinational businesses, all with pan-European interests. A bifurcated, bespoke age rating system for the UK represents added complexity and significant risks to the industry and to British consumers, with no additional benefit for child safety in return. With more than one single standard, game developers have to guess the criteria set by censors. A new standard and an extra layer of administration can only hinder the timing in getting games into the hands of British consumers. A separate rating system for British games will create delays and will create cost, both of which eventually will be borne by British gamers, and impact the UK's leadership position as the largest market for games in Europe.

The European Commission has been vocal in its strong support of PEGI as a pan-European, self regulated age rating system. The addition of complexity or multiple classification systems market by market across Europe is counter productive to the efficient and smooth workings of the gaming industry, an industry that is leading growth in the media sector across the region.

PEGI continues to evolve to best reflect the evolution of the industry and the needs of consumers. As the ELSPA submission outlines, PEGI has undergone important improvements which clarify ratings and make it easier for parents and children to understand game content. PEGI is a future proof system designed by and for people who understand the nature of gaming as an entertainment medium, with the flexibility to scale and keep pace with anticipated industry growth.

The Byron Review is a snapshot of our industry in 2008. The recommendations it holds do not understand or account for the evolution of the industry, the pervasiveness of games or the explosion of online play and delivery. For today, and for tomorrow, we stand beside ELSPA in the firm belief that PEGI is the only viable content age rating system for the UK.

Yours,

A handwritten signature in black ink, appearing to read 'Keith Ramsdale'.

Keith Ramsdale
Electronic Arts
Vice President and General Manager, UK, Ireland and Nordics