

18th November 2008

Dear Sirs

**Video Games Classification: a consultation
Response by Mastertronic Group**

Mastertronic is one of the best known electronic entertainment names in Europe and leads the European value publishing sector through its "Sold Out" and "PC Gamer Presents" brands. It has many years of experience in publishing and distributing computer and video games as well as servicing the computer and video games industry. It's "Just Flight" label, has become the world's largest publisher of flight simulation software outside of Microsoft and more recently through its "Blast label" it has rapidly become a strong player in producing games aimed at the younger end of the children's market.

We are a member of ELSPA and we fully support the submission that they are making to this consultation in favour of Option 3. We agree that the UK should now adopt PEGI and PEGI Online as the single age rating system for games.

As games are increasingly available and played online, the UK should take the opportunity to update and future-proof its age rating system. A UK-only rating is out of step with what is happening elsewhere in Europe. PEGI and PEGI Online provide pan-European coverage and represent a safe, successful and strong system for classifying age-related content.

Over recent months PEGI has undergone further significant improvements which clarify the ratings and make it easier for parents and children to understand game content. We believe these improvements add to the protection PEGI offers to children playing online. PEGI is also "future-proof", since it has the flexibility, scalability and efficiency to allow it to cope with enormous increases in online gaming that the industry expects to see in coming years.

PEGI also delivers better understanding of the game-playing experience and the ratings challenges this presents. Finally, from the perspective of my business, PEGI's widespread coverage and acceptance offers greater opportunities for us to publish high quality games across the large European market.

We agree with the detailed arguments contained in the ELSPA submission. However, I wanted to add some further detail on the specific questions you ask as they relate directly to my company:

Q26: What are the likely implications (including costs) for games producers of having a BBFC classification system that does not automatically translate across to some other European countries?

Through our Blast label we have made games targeted at a specific consumer age group and have had to ensure that these games will be rated at a level appropriate for that age group. At present we have found that obtaining a PEGI rating in the UK has given us a certain degree of confidence and consistency knowing that we are able to use the same content throughout the majority of European countries for local audiences. If all games for sale in the UK have to be sent to the BBFC for rating it will not only cause extra financial and administrative issues for us, it may also affect the design of the game to reflect the differences in criteria that the two systems use for rating content.

Q41: Do you think the PEGI-only option would be more or less costly to the games industry than both the current system and the hybrid system and if so what evidence do you have of this?

Our internal records show that the majority of our games across all our brand labels have been rated solely through PEGI and not the BBFC. Thus, as far we are concerned, having to get games rated through both PEGI and the BBFC would greatly increase costs. Conversely, having a single PEGI-only option would ensure administrative consistency and cost savings.

In summary we have found the Byron Report to be well presented and delivered and really constructive, ultimately delivering a solution which will ensure that children are properly protected now and in the future. I hope that our evidence will help you support the proposals made by Elspa for the adoption and on-going evolution of the PEGI system.

Yours faithfully,

Andrew Payne
Managing Director
Mastertronic Group Limited