

SBS Broadcasting Networks Ltd

Chiswick Park, Building 5, 566 Chiswick High Road, London, W4 5YA, UK

Natasha Davey,
AMVS Implementation
Department of Culture, Media and Sport
2-4 Cockspur Street,
London
SW1Y 5DH

Date
31 October 2008

Dear Ms Davey,

AMVS Implementation

About the ProSiebenSat.1 Group

With 26 free TV stations, 24 pay TV channels and 22 radio networks in 13 European countries, the ProSiebenSat.1 Group is one of the leading European media corporations, with seven channels operating with an Ofcom licence. The ProSiebenSat.1 Group has about 6,000 employees across Europe. The Company, which is listed in the MDAX prime standard, is headquartered in Munich, and has its UK operations based in London.

Response to DCMS consultation

We welcome the opportunity to respond to the DCMS consultation on implementing the EU audiovisual services directive, and strongly endorse the response by the Satellite and Cable Broadcasters Group (SCBG), which we are a member of, to the DCMS consultation.

In addition to SCBG's response, we would like to elaborate only briefly on certain aspects regarding Product Placement (question 26).

We consider it crucial that the creative television industry in Europe can reach a level playing field with its non-EU competitors. Therefore, we welcome the possible liberalizations, as outlined in the EU audiovisual media services directive.

The importance of a competitive industry regulation in the United Kingdom can not be underestimated, especially when compared with other EU member states which either already allow Product Placement, or plan to implement the new Directive's liberalizations.

Besides the stimulating effects which Product Placement will have on UK productions for UK broadcasters it should also be taken into consideration that the export of television content is a vital part of the industry's business activities. Currently, the flow of television programmes is dominated by the US production industry, which already benefits from Product Placement, and

Besides the stimulating effects which Product Placement will have on UK productions for UK broadcasters it should also be taken into consideration that the export of television content is a vital part of the industry's business activities. Currently, the flow of television programmes is dominated by the US production industry, which already benefits from Product Placement, and therefore has a competitive edge when compared with its UK counterparts. Allowing Product Placement in UK television productions (in those genres specified by the AVMS Directive) will therefore not only make UK productions more competitive on UK channels but also in the arena of international programmes sales.

Yours sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'Peter W. Thrane', is written over the typed name and address.

Peter W. Thrane
Managing Director
SBS Broadcasting Networks Ltd.
Chiswick Park
Building 5, 566 Chiswick High Road
London
W4 5YF, UK