

23 February 2023

Prominence framework for connected TV Devices – Proposals Paper

Dear Madam/Sir

We refer to the above Proposals Paper released in December 2022 by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department).

We are actively interested in the Department's proposals to legislate a prominence framework in Australia.

BBC Studios is a fully commercial subsidiary of the BBC in the business of producing and distributing content across many markets, owned by but structurally separate from the BBC Public Service in the United Kingdom. Our Australian entity, BBC Studios Australia Pty Ltd, located in Sydney and employing approximately 100 Australian-based permanent employees, has a diverse range of activity across the media and entertainment industry:

- Locally producing television programs on behalf of broadcasters and streamers in Australia including much loved formats such as Great Australian Bake Off on Foxtel and Mastermind on SBS;
- Distributing content to local SVOD services like Stan and Binge, to the ABC and SBS, and to all of the free-to-air networks;
- Locally managing and operating nine (9) BBC branded channels delivering content across a number of genres, including our award winning factual content, broadcast on Foxtel and Fetch TV;
- re-broadcast of the respected BBC World News channel;
- Managing licensing collaborations and the running of live events for well-known brands including the iconic *Bluey*; and
- We also are involved in the sale, at a global level, of content to global streamers such as Netflix and Amazon.

BBC Studios Australia is truly unique - playing an important role producing Australian content, providing Australians with a diverse range of informative and distinctive voices, and delivering a trusted and impartial news service with presence across the globe. This long-standing involvement in the industry aligns with the objectives of media policy as noted in the Proposals Paper, but brings with it challenges as to how we believe regulation should best capture the various contributions we make to the industry.

While we do not wish to make a formal submission at this stage of the process as we would prefer to wait until more concrete proposals are under consideration, we would like to be involved as a key stakeholder in the process going forward and request that you include us in any further communications to or consultations with other relevant stakeholders.



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We look forward to contributing further to this process

Best regards,

On behalf of BBC Studios Australia and New Zealand

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