

Supporting Australian stories on our screens – Options Paper

Response from ViacomCBS

3 July 2020

Who we are

ViacomCBS is a leading global media and entertainment company that creates premium content and experiences for audiences worldwide. Its iconic brands include *CBS*, *Showtime Networks*, *Paramount Pictures*, *Nickelodeon*, *MTV*, *Comedy Central*, *BET*, *CBS All Access*, *Pluto TV* and *Simon & Schuster*, among others. The company delivers the largest share of the U.S. television audience and boasts one of the industry's most important and extensive libraries of TV and film titles.

Its Australia and New Zealand operations are part of the ViacomCBS Networks International division. Its local brands include *Network 10*, *Nickelodeon Australia*, *MTV Australia*, *Comedy Central*, *Spike*, *Paramount Pictures Australia*, *Simon & Schuster Australia* and *CBS Interactive*.

ViacomCBS Networks International provides capabilities in production, distribution and advertising solutions for partners on five continents and across more than 180 countries.

We will refer to ourselves as ViacomCBS for the purposes of this submission.

Introduction

ViacomCBS is a proud and substantial investor in the Australian production sector in the development of both local programs and major international productions.

Our local brands are well known to Australian audiences across a multitude of free to air and subscription broadcast channels and digital platforms. These include *Network 10 (10, 10 Bold, 10 Peach, 10 Play)*, *10 All Access*, *Nickelodeon*, *Nick Jr*, *MTV*, *Spike* and *Comedy Central*.

Our brands and platforms are home to some of the most popular and talked-about shows in Australia including, *MasterChef Australia*, *Have You Been Paying Attention?*, *The Project*, *Australian Survivor*, *The Bachelor Australia*, *The Bachelorette Australia*, *The Masked Singer*, *I'm A Celebrity...Get Me Out Of Here!*, *Neighbours*, *Five Bedrooms*, *Bondi Rescue*, *Ambulance Australia*, *The Secrets She Keeps*, *Gogglebox Australia*, *The Living Room*, *Hughesy*, *We Have A Problem*, *How To Stay Married*, *Teen Mom Australia*, *MTV Unplugged*, *TRL*, *Calvin & Kaison's Play Power*, *Ready Set Dance* and *The Veronicas: Blood Is For Life*.

Combined, ViacomCBS channels (FTA + Pay TV) reach 17.2 million Australians every month, and 3.1 million Australians on our digital platforms¹.

Through our major production assets, such as *Paramount*, *CBS Television Studios*, *BET Films* and *Nickelodeon*, ViacomCBS has brought significant investment to Australia for the production of major international films and television series.

¹ Source: OzTAM, 5 City Metro, Regional TAM, Combined Aggregate Markets, Week 1-52 2019, % of metro combined 2am-2am, Consolidated 7 Network 10 + Viacom monthly reach, Nielsen Digital Content Ratings (2+, text only, March 2020, Network 10, Viacom additional unique visitors Adobe Analytics, 2019 average

In recent years these have included *Dora and the Lost City of Gold* and *Monster Problems*, both of which were filmed on the Gold Coast, and *Shantaram*, developed for Apple TV+, that is being filmed in Victoria. A number of titles have invested in Australia's post-production and visual effects industry including, *Why Women Kill*, *What Men Want* and *Terminator: Dark Fate*. These projects combined delivered \$130 million of investment to Australia, creating 990 jobs and supporting more than 700 Australian businesses.

Outcomes of reform

ViacomCBS supports the Federal Government in its work to modernise local content regulation and review the effectiveness of the production incentives for film and television.

This is a long overdue opportunity to enhance the viewing experience for Australian audiences while also realising the full potential of the Australian production sector to be a significant production hub for global content.

ViacomCBS believes the reform process needs to achieve two main goals:

1. Local content rules that are fairer and more flexible for broadcasters to encourage a greater diversity of quality local content that meets modern audience needs.
2. Production incentives that encourage a greater balance of investment in both local and international film and television content, creating a more sustainable Australian production sector

This submission will outline how to achieve these twin goals and should be read in conjunction with the substantial submissions written by *Free TV Australia*, the *Australian Subscription Television and Radio Association (ASTRA)*, the *ANZ Screen Association (ANZSA)* and the *Motion Pictures Association of America (MPA)*.

As members of these associations, *ViacomCBS* has provided significant input and therefore largely supports their positions and recommendations.

By providing our own submission we hope to provide some additional context across the areas of this reform process that impact on our business.

ViacomCBS main recommendations

- Modernise local content rules for commercial free to air television by:
 - Replacing current broadcast quotas with an equivalent but more flexible combined transmission quota.
 - Replacing the existing sub-quotas with an annual points quota made up of any qualifying Australian drama, documentary or children's programming available across a network's channels or online platforms.
- Remove or reduce the NEDE obligations on the subscription television broadcasters;
- Introduce voluntary reporting by SVODs of their Australian-based activities to both identify and encourage investment in:
 - Investment in Australian stories, including both new and existing content for local and global audiences.
 - Investment in the Australian production sector, including production infrastructure.
- Reform the three production offsets, including an equal rate of 40% Producer Offset for qualifying Australian film and television content, and a 30% Location Offset and PDV Offset. Align the qualifying genres across the three offsets and reduce the minimum spend thresholds to qualify for the incentives.
- Identify a longer-term plan for further de-regulation including opportunities to further expand the production incentives program.

The Options Paper

Firstly, we'd like to thank Screen Australia and ACMA for the work they have put into the Options Paper. The models outlined have provided a number of ways that we believe, when combined, can deliver reforms for both the short and longer term.

Australia is a mature and highly competitive market with a thriving ecosystem of content providers, content creators and engaged audiences with a diversity of tastes.

The long-held experience of *Network 10* is that there has always been huge demand for Australian content from audiences. They reward those content platforms that continue to deliver high quality local content; but what they are looking for now is greater choice and diversity that keeps up with their evolving tastes.

A process of de-regulation would allow the commercial FTA networks and STV to diversify their local content offerings delivering the widest range of choice for content hungry viewers.

It is therefore our firm view that the long-term goal of policy makers should be that proposed in Model 4 (de-regulation) of the Options Paper. This model rightly identifies that a focus on production incentives, not quotas, will become the most sustainable way to deliver both Australian cultural policy objectives and the desire for a thriving, more globally significant Australian production sector.

We understand that moving to such a policy framework in one step is unlikely to garner widespread support in the short-term.

That is why ViacomCBS supports a first-step hybrid approach as the best way to immediately provide a fairer and more flexible regulatory system for broadcasters along with boosted production incentives that deliver immediate investment growth in Australia's production sector.

ViacomCBS does not propose to offer commentary on each individual model outlined in the Options Paper. We will instead provide our recommendations on the four key areas identified for reform that were covered by the paper, namely:

- Local Content Regulations for Free to Air television
- Subscription Pay Television local content obligations (NEDE scheme)
- The future for SVODs
- Production incentives

Regulation diminishes content choice for audiences

It is our view that the Australian community and the production industry have been let down by current regulations.

The local content rules, governed by the *Broadcast Services Act*, in particular the sub-quotas for drama, documentary and children's programs on commercial FTA and the NEDE on STV, have stymied creativity and diversity amongst the Australian commercial free to air and subscription broadcasters.

These quotas effectively require the commercial broadcasters to deliver significant amounts of the same formats of Australian content at a time when audiences are demanding more diversity of content than ever before.

This is critical in the era of digital platforms where audiences are increasingly fracturing as consumers seek out more niche content that suits their interests. However, commercial broadcasters are effectively discouraged by regulation from meeting these demands for more content diversity.

If FTA and STV broadcasters are prevented from meeting audience demands then the decline in viewers will continue. As audiences fall, so too will revenue from advertisers; and without these revenues broadcasters will be unable to sustain investment in more in-demand Australian content.

If reform stagnation is allowed to continue over the longer term it is our view that the existing market of three commercial FTA networks will likely become unsustainable, leaving regulators, government and the production industry with a much tougher problem to solve than today.

Local Content Regulations for Free to Air Television

ViacomCBS Recommendations

ViacomCBS strongly supports the recommendations outlined in the Free TV Australia submission. These include:

- Remove the requirements to broadcast Australian children’s programming (C & P classification) and remove the corresponding scheduling restrictions;
- Replace all the existing local content sub-quotas with a new annual points system that can be flexibly made up of content across any of the following genres: Adult drama, Children’s content and Documentary;
- Content can be first-run on any platform owned by the broadcaster (such as a BVOD platform) and qualify for the points system;
- Allow Australian content made for subscription broadcast television (STV) to qualify for the points system when it is subsequently first-run on a commercial FTA broadcaster.
- Replacing the existing Australian content broadcast quotas (primary and multichannel) with an equivalent singular *Transmission Quota* of 5074 hours that can be flexibly acquitted across any channels operated by a Commercial FTA Network;
- Support Australian sports fans by modernising the sport anti-siphoning regulations to include online platforms such as SVODs and social media to ensure all Australians continue to have free and reliable access to major sporting events of national interest.

We value Australian content

There is no argument that Australian audiences really value having access to local content. It’s why ViacomCBS is deeply committed to the ongoing investment in and delivery of quality Australian content. We do this not because regulators require us to but because our audiences want us to.

Network 10’s biggest shows drive national culture

2019-20



1,341,000
viewers per episode

231,000
social media interactions



1,358,000
viewers per episode

1,992,000
social media interactions



584,000
viewers per episode

1,671,000
social media interactions



1,144,000
viewers per episode

1,147,000
social media interactions



1,246,000
viewers per episode

1,113,000
social media interactions

Source: OzTAM, 5 City Metro, Regional TAM, Combined Aggregate markets, OzTAM National VPM

In 2019, *Network 10* broadcast more than 7,110 hours of Australian content, including more than 4,580 hours on our primary channel *10*. This exceeded the broadcast quotas for local content by more than 40%. In fact, Channel 10’s nightly prime time schedule consistently has more than 70% Australian content.

Flexibility to meet evolving audience needs is rewarded by viewers

ViacomCBS and *Network 10* constantly listen to the feedback of audiences and meet their always evolving content demands. This has been most evident in 2020 as Australia has been gripped by some of the worst bushfires on record and the COVID-19 pandemic.

Network 10 significantly increased content hours for news-based programs *10 News First*, *Studio 10* and *The Project*. This included regular extended broadcasts or interruption of scheduled non-news programs to bring audiences the latest information and live press conferences of these two major events. This flexibility to our

broadcast schedule and program offering was well received by viewers and highlighted again the power of FTA TV when it is able to flexibly meet its audiences' needs.

Australians rely on commercial TV news when the world changes

2019-20

Year-on-year audience
2019/20 bushfire season
Dec 15-Jan 11

Year-on-year audience
COVID-19 pandemic
March 15-May 30



+10% in total people
+24% in under 50s

+30% in total people
+54% in under 50s



+7% in total people
+8% in under 50s

+41% in total people
+53% in under 50s

Source: OzTAM, 5 City Metro, Consolidated 7

This same flexibility has been required to respond to the local and global disruptions caused by COVID-19. *Network 10* has worked with its local content suppliers to not only ensure most productions have been able to continue but many of its scripted dramas scheduled for 2020 release were fast-tracked onto the *10 Play* BVOD platform to provide Australians stuck at home with high quality Australian programs to stream and binge while in isolation.

In response to the surge in audiences during COVID-19 and their demand for even more new content *Network 10* has expanded its local production slate for the year, including commissioning a spin-off *Junior MasterChef* program to air later in 2020. While a new multichannel offering further diversity of content will be launched by *Network 10* before the end of the year.

Despite the incredible disruptions to production and scheduling *Network 10* is on track to again exceed the broadcast quotas for local content in 2020.

As we begin to climb out of the COVID-19 crisis, *Network 10* is already commissioning a strong schedule of local content for 2021 to meet our audiences' appetite for quality Australian programs while also providing significant jobs and investment within the local production sector.

While the COVID-19 lockdown has seen a percentage spike in audiences for *Network 10* (higher than any other broadcaster) there are still clear patterns in audience trends and behaviour that continue to highlight the problems with our local content rules, in particular the sub quotas, that are continuing to negatively impact the networks and our audience retention.

Viewer behaviour and tastes have changed but the regulations have not

TV remains the most dominant daily pastime of people around the world, and no more so than here in Australia, according to recent research conducted by ViacomCBS across 10 countries, including Australia. But while "TV" used to describe the platform you were using (ie. television broadcasts), today "TV" is used as a colloquial term for "content" viewed anywhere on any platform or device.²

² <https://insights.viacom.com/post/global-viewers-love-tv-but-want-a-simpler-experience/>

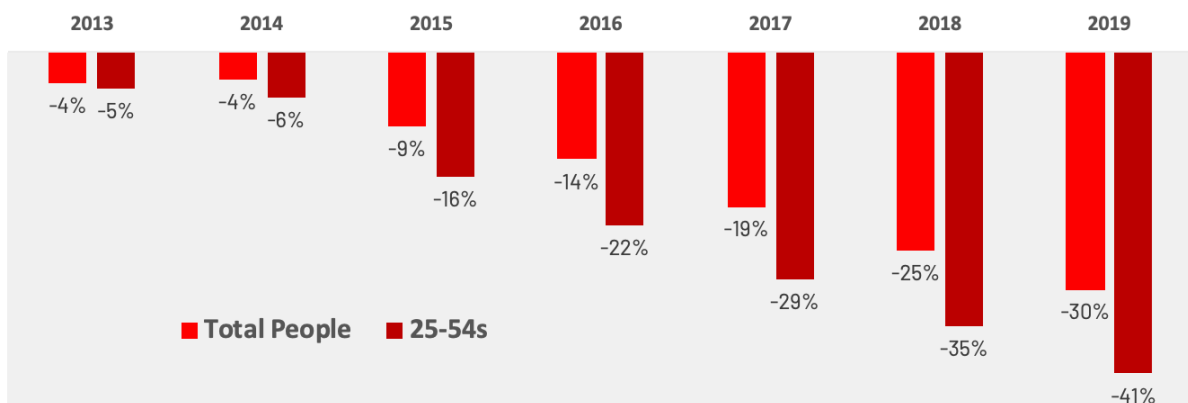
The ViacomCBS research found Australians are voracious consumers of TV with 94% of Australians watching some form of TV content sourced from any multitude of platforms and sources³. In fact, the research revealed 84% of Australians say that TV is a part of their daily life (compared to a global average of 69%) with 83% saying that it's an important source of entertainment (vs 70% globally). However, the way they are consuming TV content is changing rapidly. While 83% of Australian TV viewers still use their TV set, 76% now also utilise a laptop or desktop, with 65% using their smartphones to watch TV content.

The ViacomCBS study provides insight into why Australia's FTA broadcasters have been so negatively impacted by the increasing array of platform choices and content available to consumers.

What began with *YouTube* in the 2000s has now become a conga line of digital platforms, in particular, Subscription Video On Demand (SVOD) services such as *Netflix*, *Amazon Prime*, *Disney+*, *Apple TV+*, *hayu*, *Stan*, *Foxtel Now*, *Kayo*, *Binge* and our own *10 All Access*.

This is borne out in the OzTAM data, which shows while audiences had been challenged already by the rise of *Youtube* and *Facebook*, that as the number of SVODs have grown, beginning with *Stan* and *Netflix* in 2015, the audiences for FTA TV have seen more significant declines.

6pm to 10.30pm Commercial TV audience versus 2012



Source: OzTAM, 5 City Metro, 6pm to 10.30pm, 2012-2019 calendar years

It is those audiences under 55 that are being particularly let down by the regulations imposed on the commercial FTA broadcasters which is borne out in the OzTAM data. The under 55s are active platform hoppers who seek the content they want, where they want it, when they want it. Something regulation is clearly stymieing when it comes to commercial FTA TV.

Under 55s are also the key demographics for advertisers which means the larger declines in younger audiences are exacerbating the declines in revenue for the commercial FTA networks.

To address the audience and revenue challenges FTA broadcasters are under increasing pressure to offer more channels with more diversity of content. However, the current broadcast quotas for local content are restricting our ability to diversify our channels and programming suite while still meeting the Australian content broadcast requirements.

The local content sub quotas let down viewers

In 2019, *Network 10* commissioned a slate of Australian drama, children's programs and documentaries as is required to meet the local content sub-quota obligations enforced by the ACMA.

³ <https://insights.viacom.com/post/in-australia-tv-is-an-essential-part-of-everyday-life/>

This included over 184 hours of first-release Australian drama, over 40 hrs of first-run Australian documentaries, 32 hours of first release Australian C drama and 263 hours of Australian Children's (C) and preschool (P) classified content. This exceeded the requirements in every category.

These are significant annual financial investments that *Network 10* is required to meet regardless of whether there is a large enough audience to attract the advertising revenue that is required to sustain it.

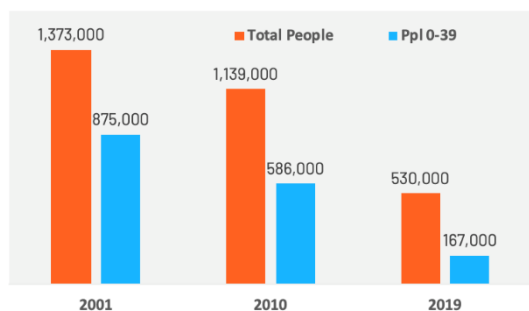
The issue being faced by all broadcasters is that while audiences do clearly value commercial FTA TV, they now face enormous competition amongst certain program types such as adult drama, film, documentary and children's content.

As the following figures show, Australian audiences for adult drama on commercial FTA TV have significantly declined as the platform competition and content options have both grown – down by 61% over the past 20 years. The falls are particularly evident in younger demographics with the under 40s audiences for drama down 81%. The most significant audience falls have been felt over the past decade as alternative digital platforms such as *YouTube* and SVODs such as *Netflix* have risen.

Australian drama

2001 vs. 2010 vs. 2019

Audiences for Australia drama has fallen by 61% since 2001, and by 81% among under 40s. Australian drama averaged 530,000 7 day TV viewers in 2019.



Source: OzTAM, 5 City Metro, 5am-5pm, Commercial primary channels, Consolidated 7, 2019 calendar year

The Secret Life Of Us, Offspring and Five Bedrooms

Comparing 10's younger skewing key drama in 2001 (The Secret Life Of Us), 2010 (Offspring) and 2019 (Five Bedrooms), Under 40s audience has fallen by over 500,000 viewers.

The incremental 10 Play audience for Five Bedrooms (76,000) would skew younger than television, but does not make up even a fifth of the decline in total.

| | 7 Day TV Total People | 7 Day TV Ppl 0-39 | 7 Day BVOD 10 Play | 7 Day TV + 10 Play |
|-----------------------|-----------------------|-------------------|--------------------|--------------------|
| The Secret Life Of Us | 977,000 | 738,000 | n/a | 977,000 |
| Offspring | 1,080,000 | 745,000 | n/a | 1,080,000 |
| Five Bedrooms | 596,000 | 221,000 | 76,000 | 672,000 |

When comparing the top programs on FTA TV and their catch-up platforms against the top programs on SVODs it is easy to understand what is driving the changes in viewer behaviour.

Reality programs, news and light entertainment make up 21 of the top 25 programs on all FTA TV and all of the top 10. In fact, only one Australian scripted drama program makes it into the top 30 programs for 2019.

The biggest programs on Australian TV are reality

2019

Excluding sport, the biggest programs in Australian TV are reality formats (and News).

| | Country | Channel | Total People | Ppl 55+ | Ppl 55+ % of Total | | Country | Channel | Total People | Ppl 55+ | Ppl 55+ % of Total | | |
|----|---------------------------------|----------------|--------------|-----------|--------------------|-----|---------|--------------------------------------|----------------|---------|--------------------|---------|-----|
| 1 | MARRIED AT FIRST SIGHT | Australia | Nine | 1,437,000 | 461,000 | 32% | 26 | OLD PEOPLE'S HOME FOR 4 YEAR OLDS-EV | Australia | ABC | 718,000 | 452,000 | 63% |
| 2 | LEGO MASTERS | Australia | Nine | 1,310,000 | 290,000 | 22% | 27 | ANH'S BRUSH WITH FAME-EV | Australia | ABC | 718,000 | 529,000 | 74% |
| 3 | AUSTRALIAN NINJA WARRIOR | Australia | Nine | 1,050,000 | 335,000 | 32% | 28 | MASTERCHEF AUSTRALIA | Australia | 10 | 710,000 | 263,000 | 37% |
| 4 | THE BLOCK | Australia | Nine | 1,028,000 | 386,000 | 38% | 29 | HOUSE RULES | Australia | Seven | 704,000 | 328,000 | 47% |
| 5 | THE VOICE | Australia | Nine | 1,016,000 | 373,000 | 37% | 30 | HARD QUIZ S4-EV | Australia | ABC | 701,000 | 469,000 | 67% |
| 6 | THE MASKED SINGER AUSTRALIA | Australia | 10 | 1,013,000 | 298,000 | 29% | 31 | THE GOOD DOCTOR | USA | Seven | 695,000 | 399,000 | 57% |
| 7 | SEVEN NEWS | Australia | Seven | 935,000 | 606,000 | 65% | 32 | TOTAL CONTROL-EV | Australia | ABC | 692,000 | 550,000 | 80% |
| 8 | THE ALL NEW MONTY | Australia | Seven | 899,000 | 524,000 | 58% | 33 | 60 MINUTES | Australia | Nine | 690,000 | 325,000 | 47% |
| 9 | MY KITCHEN RULES | Australia | Seven | 897,000 | 414,000 | 46% | 34 | BACK ROADS S5-EV | Australia | ABC | 685,000 | 555,000 | 81% |
| 10 | TRAVEL GUIDES | Australia | Nine | 880,000 | 289,000 | 33% | 35 | THE BIG BANG THEORY | USA | Nine | 674,000 | 244,000 | 36% |
| 11 | HAVE YOU BEEN PAYING ATTENTION | Australia | 10 | 854,000 | 240,000 | 28% | 36 | THE CRY-EV | Australia | ABC | 667,000 | 527,000 | 79% |
| 12 | NINE NEWS | Australia | Nine | 837,000 | 510,000 | 61% | 37 | THE AMAZING RACE AUSTRALIA | Australia | 10 | 664,000 | 200,000 | 30% |
| 13 | UTOPIA-EV | Australia | ABC | 835,000 | 406,000 | 49% | 38 | SEACHANGE | Australia | Nine | 660,000 | 365,000 | 55% |
| 14 | AUSTRALIAN SURVIVOR | Australia | 10 | 827,000 | 215,000 | 26% | 39 | BAD MOTHERS | Australia | Nine | 658,000 | 227,000 | 35% |
| 15 | THE BACHELOR AUSTRALIA | Australia | 10 | 826,000 | 201,000 | 24% | 40 | DAVID ATTENBOROUGH SEVEN WORLDS | United Kingdom | Nine | 655,000 | 341,000 | 52% |
| 16 | HAMISH & ANDY'S PERFECT HOLIDAY | Australia | Nine | 816,000 | 220,000 | 27% | 41 | AUSTRALIAN STORY-EV | Australia | ABC | 654,000 | 495,000 | 76% |
| 17 | VERA S8-EV | United Kingdom | ABC | 812,000 | 700,000 | 86% | 42 | SHAUN MICALLEF'S MAD AS HELL S10-EV | Australia | ABC | 653,000 | 398,000 | 61% |
| 18 | THE BACHELORETTE AUSTRALIA | Australia | 10 | 792,000 | 178,000 | 22% | 43 | ENDEAVOUR-EV | United Kingdom | ABC | 652,000 | 564,000 | 87% |
| 19 | GOGGLEBOX | Australia | 10 | 791,000 | 235,000 | 30% | 44 | HOME AND AWAY | Australia | Seven | 645,000 | 331,000 | 51% |
| 20 | AUSTRALIA'S GOT TALENT | Australia | Seven | 790,000 | 409,000 | 52% | 45 | ABC NEWS SUNDAY-EV | Australia | ABC | 642,000 | 504,000 | 78% |
| 21 | GRUEN-EV | Australia | ABC | 776,000 | 448,000 | 58% | 46 | ABC NEWS-EV | Australia | ABC | 639,000 | 490,000 | 77% |
| 22 | DEATH IN PARADISE-EV | United Kingdom | ABC | 752,000 | 634,000 | 84% | 47 | HARROW-EV | Australia | ABC | 635,000 | 514,000 | 81% |
| 23 | I'M A CELEBRITY | Australia | 10 | 742,000 | 235,000 | 32% | 48 | THE WEEKLY WITH CHARLIE PICKERING-EV | Australia | ABC | 627,000 | 394,000 | 63% |
| 24 | MANHUNT | United Kingdom | Seven | 736,000 | 559,000 | 76% | 49 | THIS TIME NEXT YEAR | Australia | Nine | 603,000 | 275,000 | 46% |
| 25 | A CURRENT AFFAIR | Australia | Nine | 720,000 | 423,000 | 59% | 50 | FIVE BEDROOMS | Australia | 10 | 596,000 | 234,000 | 39% |

Source: OzTAM, 5 City Metro, 6pm to midnight, 10/9/7 primary channels, Jan 1 to Dec 9 2019, minimum 2 episodes, Consolidated 7

Even for the commercial FTA TV catch-up platforms just two of the top 20 are first-run Australian dramas, namely *Neighbours* and *Home & Away*.

The top programs on commercial BVOD services are Australian 2019-20, ranked by total minutes viewed

| | Series Name | Network | Country | Genre | Minutes Viewed |
|----|--|---------|------------|---------|----------------|
| 1 | Married at First Sight Season 6 | Nine | Australian | Reality | 1,004,856,335 |
| 2 | Love Island UK Season 5 | Nine | UK | Reality | 513,318,115 |
| 3 | Home And Away | Seven | Australian | Drama | 458,726,106 |
| 4 | Love Island Australia Season 2 | Nine | Australian | Reality | 374,492,972 |
| 5 | My Kitchen Rules | Seven | Australian | Reality | 322,575,466 |
| 6 | The Block Season 15 | Nine | Australian | Reality | 308,921,719 |
| 7 | MasterChef Australia | 10 | Australian | Reality | 274,394,713 |
| 8 | The Bold and The Beautiful Fast Tracked | 10 | USA | Drama | 241,387,260 |
| 9 | The Bachelor Australia | 10 | Australian | Reality | 211,227,841 |
| 10 | Bachelor In Paradise | 10 | Australian | Reality | 206,725,761 |
| 11 | Blue Heelers | Seven | Australian | Drama | 201,110,318 |
| 12 | Australian Survivor | 10 | Australian | Reality | 189,592,727 |
| 13 | House Rules | Seven | Australian | Reality | 186,699,688 |
| 14 | Neighbours | 10 | Australian | Drama | 171,771,494 |
| 15 | The Bachelorette Australia | 10 | Australian | Reality | 151,313,427 |
| 16 | The Voice Season 8 | Nine | Australian | Reality | 143,827,194 |
| 17 | Bride & Prejudice - The Forbidden Weddings | Seven | Australian | Reality | 116,032,386 |
| 18 | The Good Doctor | Seven | USA | Drama | 109,182,523 |
| 19 | All Saints | Seven | Australian | Drama | 94,376,451 |
| 20 | New Amsterdam Season 1 | Nine | USA | Drama | 91,148,188 |

Source: OzTAM, National VPM, 2019

Unsurprisingly the picture for SVOD is completely different. Drama has no peer. Recent data of the global viewing trends of the major SVOD platforms found that the top 20 programs were all TV dramas or films.⁴ On ViacomCBS's own SVOD service *10 All Access*, 19 of the top 20 programs are dramas.

What the data shows is that commercial FTA TV remains popular for family friendly event TV that appeals to mass audiences. While consumers increasingly turn to SVODs for their fix of scripted content where they can binge watch big budget titles without interruption.

C & P classified programming on commercial FTA TV

Children still love to watch commercial FTA TV. But like all age groups their viewing habits have evolved over time as their choices of platform and content have grown.

Kids programming on FTA TV is now rightly dominated by the ABC who offer substantial local and foreign children's content across two multichannels that is available much of the day and night. As the Government-funded broadcaster the ABC should be fulfilling this role where it can make content choices free of commercial responsibility and reality.

Children are now also spoiled for content choices across a multitude of platforms, including the always popular ViacomCBS-owned *Nickelodeon* and *Nick Jr.*, as well as SVODs such as *Disney+* and the millions of free minutes of content on *YouTube*.

Like the rest of their family they are tuning-in to commercial FTA TV in significant numbers for shows such as *MasterChef Australia*, *The Masked Singer Australia*, *Survivor*, *I'm a Celebrity*, *Have You Been Paying Attention*, *Bondi Rescue* and *Gogglebox*.

In fact, according to OzTAM data an episode of *The Masked Singer* will attract an 0-15s audience that is 15,000% larger than the average audience for our longest running children's program *Totally Wild*.

⁴ <https://www.forbes.com/sites/danafeldman/2019/12/16/the-top-20-streamed-shows-of-2019-all-but-one-is-on-netflix/#682f30d74628>

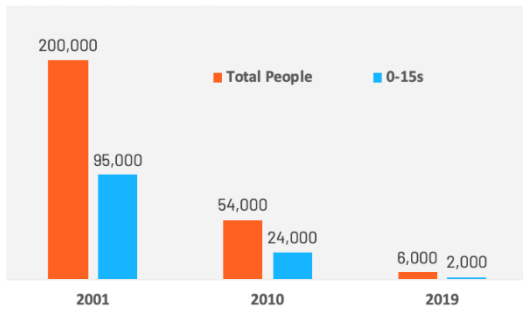
But where kids are not currently engaging is with content that's required to be broadcast to them in regulated children's viewing hours.

As the choices have grown for kids, their viewing of children's programs during regulated children's programming hours on commercial FTA has plummeted – down by more than 90% over 20 years.

Children's content

2001 vs. 2010 vs. 2019

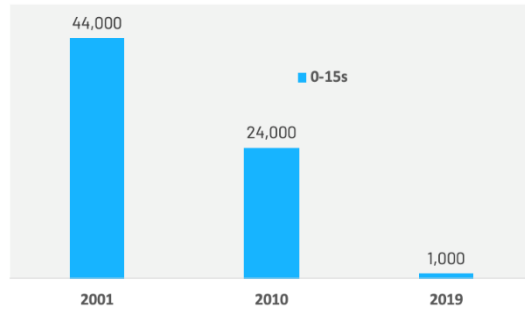
Audiences for Australia children's content across the commercial networks has fallen from 200,000 in 2001 to 6,000 in 2019. Australian children's content averages an audience of just 2,000 under 15 viewers. Of the 1,891 episodes of Australian children's content on the commercial networks this year, 527 had a 0-15 audience of exactly zero, and 990 had a 0-15 audience of under 500.



Source: OzTAM, 5 City Metro, 5am-5pm, Consolidated 7., 0 audience analysis to Oct 13, 2019 calendar year

Totally Wild

Totally Wild is a locally produced Australian children's program, teaching children about Australian wildlife and conservation. It has declined from an under 15s audience of 44,000 in 2001 to just 1,000 in 2019.



The situation is beyond unsustainable for the commercial FTA networks.

The case for removing the children's content obligations and the corresponding broadcast scheduling restrictions is compelling and must be done so immediately.

A new flexible quota for culturally significant content

ViacomCBS is not arguing that drama and kids content cannot succeed on commercial FTA TV and its catch-up BVOD platforms, rather that regulations need to reward networks who take risks to invest in different strategies and content approaches that resonate with our audiences.

Free TV Australia has long argued for changes to these sub-quota rules because they clearly no longer serve the best interests of the viewing public.

In its submission Free TV Australia has recommended that the sub quotas for drama, children's and documentary programs be scrapped and replaced.

It has recommended that they be replaced with a more modern regulation that would require networks to meet a set number of points per annum.

These points can be accumulated through the production of drama, documentary or children's content but with no requirement to invest in all three genres.

Under Free TV Australia's proposal, the points would be modified to better recognise varying levels of expenditure on different scripted programs.

For example, a scripted comedy that runs at 30 minutes an episode or a mini-series drama with one hour episodes, could both receive the same points if they share an equivalent QAPE (Qualifying Australian Production Expenditure).

The higher the QAPE cost of a drama the higher the points. While networks who invest in financially risky children's programs would also be incentivised and rewarded with a high level of points.

To ensure that the new quota and points system is flexible and future-proofed, Free TV Australia has also recommended that content qualify for points regardless of whether it is first-run on linear transmission or any platform owned by the broadcaster, such as a BVOD like *10 Play*.

Free TV also recommends that Australian content made for subscription broadcast television (STV) that is subsequently first-run on a commercial FTA broadcaster should therefore qualify for the FTA network's points quota.

A Transmission Quota will add more flexibility and choice for audiences

Under the *Broadcasting Services Act* all commercial FTA networks are required to deliver 55% Australian content on one primary channel between 6am and midnight (equivalent to 3614 hours), and a total of 1460 hours across their multichannels.

While arguably a primary channel was suitable to audiences a decade ago – as the transition (and switch-off) from analogue to digital was undertaken and audiences got used to a multichannel environment – it is serving little purpose for viewers today.

As the Options Paper points out in Model 2, a simple solution could be to remove the primary and multichannel quotas within the Act and replace them with a combined “*Transmission Quota*” covering all channels owned by the one network.

This new transmission quota should total no more than the current combined content quotas of 5074 hours per year.

This would provide broadcasters further flexibility to place Australian content where it suits their target audiences and channel strategies.

Over time, this is likely to encourage the networks to further diversify their channel and program offerings and broaden the choice of Australian shows. This will benefit viewers and support a greater variety of Australian production companies.

Support Australian sports fans by modernising the Anti-Siphoning rules

The anti-siphoning rules introduced by the Howard Government have been a popular and necessary protection to ensure that Australian sports fans maintain a fair and reasonable amount of free access to major Australian sport events.

The rules have ensured that major national events such as Melbourne Cup, the AFL and NRL Grand Finals, State of Origin, the Bathurst 1000 and The Ashes cricket are free and reliably available to all Australians.

The anti-siphoning rules were developed in the early days of subscription broadcast television, well before online streaming services were thought of. Therefore, the rules only apply to Pay TV broadcasters.

This means that, for example, Foxtel could effectively bypass the anti-siphoning rules if it acquired the exclusive rights to the AFL Grand Final for its sports-based SVOD, *Kayo*. Optus Sports can also acquire exclusive rights to, for example, The Melbourne Cup, without breaching the rules. This is a loophole that was never envisaged back in the 1990s by legislators.

This also means that any SVOD, such as *Netflix* or *Amazon Prime*, or social media platform such as *Facebook*, could acquire exclusive rights to these major Australian sports without breaching the anti-siphoning regulation.

Already there are examples of SVODs acquiring sports rights, including *Amazon Prime* acquiring NFL Thursday Night football streaming rights in the United States (which was renewed for another three years in April 2020), while *Facebook* came close to finalising a deal for UK Premier League rights across south east Asia.

These moves show that SVODs are increasingly interested in acquiring live sport and have the deep pockets to push up prices for sports rights beyond what would be affordable for a commercial FTA broadcaster.

This would also have a major impact on the ability of commercial FTA broadcasters to provide a diverse range of Australian content and likely make it more difficult to fulfill the broadcast transmission quotas without significant and costly investment in other content forms.

Given commercial FTA content quotas will remain in place, anti-siphoning rules must also remain in place.

Commercial FTA broadcasters strongly recommend that the Government modernise the anti-siphoning rules to reflect their original intention – to ensure easy, free and reliable access to major Australian sport on commercial FTA TV and to help maintain the most diverse and flexible range of Australian content to meet audience tastes and demands.

Implement reforms to commercial Free to Air TV without delay

ViacomCBS strongly supports the Free TV Australia proposals outlined above and urges the Federal Government to implement them with haste.

It provides the networks much needed flexibility and rewards their investment, while still meeting the cultural objectives of the community and continuing to provide a strong pipeline of investment in the local production sector.

If implemented, this would further incentivise the commercial FTA networks to diversify their content offerings attracting and retaining a wider Australian audience.

It would also incentivise broadcasters and major SVOD services to co-produce higher cost productions that can compete on the world stage which would see more Australian culture and voices being exposed to global audiences.

Subscription Pay Television local content obligations

ViacomCBS recommendation

- Remove or phase out the NEDE scheme

ViacomCBS is a significant content provider for the subscription broadcast TV industry providing both premium content as well as operating channels for *Foxtel* and *Fetch*, including *MTV*, *Spike*, *Nickelodeon* and *Comedy Central*. The latter two are also captured by Government regulations regarding Australian drama expenditure.

Our Pay TV channels attract 11% of the total subscription television viewing for people under the age of 50 which, given the large number of Pay TV channels available, is a significant proportion of viewers.

ViacomCBS understands the subscription TV marketplace is rapidly evolving as it works to meet the challenges imposed by the growing number of SVOD platforms. This change is seeing Pay TV providers, such as *Foxtel*, create their own SVOD platforms to compete.

Regulations, such as the New Eligible Drama Expenditure (NEDE) scheme, created to ensure minimum expenditure on scripted Australian content many years ago, have not kept up with the emergence of new platform technologies & services, therefore imposing requirements which have become increasingly anachronistic in the contemporary ecosystem.

For instance, the NEDE is not required to be met by SVOD providers. As audiences move to such unregulated platforms, the benefit of any government intervention is diluted, and the pressure on the heavily regulated domestic sector increases.

As outlined in this submission, ViacomCBS supports Model 4 in the Options Paper as the best longer-term outcome for broadcasters, content creators and audiences.

However, should there not be broad stakeholder support at this stage for complete deregulation, we argue the Government should provide an immediate step towards this for subscription TV broadcasters through a phase-out of the NEDE.

This could in the first instance resemble that proposed in Model 2 of the Options Paper, which recommended Pay TV operators be given more flexibility with how they utilise their required expenditure under any government quota scheme.

This would serve to maximise audience engagement and to support innovation, growth and opportunities for their content pipelines.

Potentially, this could include allowing expenditure to be genre and format neutral (not drama specific), or for any local children's programming to count towards the NEDE given the cultural value placed on such genres by regulators.

Regardless, the scheme should be phased out as soon as practicable.

The future for SVODs

ViacomCBS recommendations

- No Australian content requirements for SVOD and other online platforms
- Voluntary reporting by SVOD proprietors detailing their broad engagement and investment in the Australian production sector

Changing audience behaviour

Australians are some of the world's most voracious consumers of subscription content anywhere in the world. 71% of consumers now have at least one subscription video service, according to the ACMA Communications Report 2018-19⁵. Of those Australians with a subscription video service, 60% of them have two or more subscriptions, with online SVOD platforms making up the overwhelming majority of services taken up.

The report paints a very clear picture of the change in viewing behaviours of Australians. In particular, it shows younger people (under 44 years of age) have significantly different viewing habits to older generations. For instance, the report has found that Australians aged 18–34 spent 82 per cent of their TV viewing time watching online content in 2019, compared to 75 per cent in 2018. They spent 6.9 hours watching subscription TV or pay per-view content, compared to only 1.9 hours watching FTA TV (live or recorded).

The SVOD Landscape is still evolving

Australia is serviced by a vast array of SVOD platforms including, *10 All Access*, *Netflix*, *Amazon Prime*, *Stan*, *Disney+*, *Apple TV+*, *Hayu*, *Foxtel Now*, *Binge* and *Kayo*, with expectations that the number of platforms available will continue to increase over the next 24 months.

Unlike broadcasters, SVOD services face no local content requirements in Australia. The exponential growth in SVOD subscriptions has understandably led to increasing demands from some quarters for local content regulation and quotas to be imposed. However, ViacomCBS cautions against this approach at this time.

Understanding SVOD Investment in Australia

Many SVODs are already investing in Australian content and the local production sector through a multitude of ways whether it be through direct investment in new Australian drama series, the licensing of new and existing content for subscribers in Australia and markets around the world, or the development of major production infrastructure. In the case of both *10 All Access* and *Stan* their parent companies also significantly invest in Australian content and the production sector through their FTA TV channels.

It is our view that instead of imposing quotas, the Federal Government and regulators could, as a first step, seek regular voluntary reporting by SVOD providers (as suggested in Model 2) outlining their investment in Australian content and the creative arts industry. Such a reporting process would give a clear and transparent understanding of the role of SVOD platforms in supporting:

- Investment in the production of new Australian content;
- Investment in the production of other major foreign films and tv series in Australia;
- Licensing of new and existing local content for consumers both in Australia and overseas;
- Investment in local production infrastructure such as film and production studio services;
- Local job creation and flow on benefits to the broader Australian economy;
- The promotion of Australia and its culture in overseas markets.

The Government should also consider measures in the near-term that would incentivise SVODs to work with the commercial FTA TV broadcasters on co-production agreements. Such a measure would have positive outcomes for Australian viewers and would see more high-quality Australian content exported to viewers around the world.

⁵ <https://www.acma.gov.au/articles/2020-02/new-acma-report-confirms-rise-streaming-australia>

Production incentives

The Australian production industry requires a better balance between investment in local and foreign productions if it is to continue to grow, thrive and diversify.

ViacomCBS recommendations

- Location Offset of 30% with expenditure thresholds significantly reduced.
- PDV Offset maintained at 30%.
- Producer Offset – an equal rate of 40% for film and television productions; or 30% for both film and tv with a 10% uplift for designated culturally significant content, such as children’s programming.
- Producer Offset expenditure thresholds reduced and more program types eligible to qualify.
- Remove restrictions that prevent any offsets being combined to match the standard global practice.
- Direct access to Screen Australia funding should be available to commercial broadcasters and commissioning platforms.

ViacomCBS significantly invests in Australia

Across our FTA TV, Pay TV and major brand assets, ViacomCBS is already a significant investor in the Australian production sector for local content but also regularly considers Australia for foreign film and television production opportunities.

In the last two years, Australian productions from our major international brands have included films *Dora and the Lost City of Gold* (received the Location Offset and Screen Queensland incentives), and *Monster Problems* (Location Offset, Location Incentive and Screen Queensland incentives), as well as SVOD series *Shantaram* (Location Offset, Location Incentive and Film Victoria incentives) currently in production for *Apple TV+*.

Combined, these three titles will deliver \$127 million of investment to Queensland and Victoria, create 990 jobs, and support more than 700 local businesses.⁶⁷⁸

A number of our other foreign film and television titles including, *Why Women Kill*, *What Men Want* and *Terminator: Dark Fate* have utilised Australia’s growing post-production and visual effects industry in 2019 and were eligible for the PDV Offset, supporting more local jobs and businesses.

This represents just a fraction of our overall global investment in film and television production. If the right mix of incentives and investment thresholds were to be put in place, Australia’s share of that investment would likely continue to grow.

Realising the potential of the Australian production sector

What makes Australia an attractive destination is its highly skilled workforce, stable system of government, the appealing mix of topography often on the doorsteps of major cities, and our growing production infrastructure.

The current low currency rate for the Australian dollar is also a key consideration.

However, where Australia falls significantly short is with its offering of production incentives which are not competitive on the global stage.

Currently, the incentives are:

- Producer Offset (PO) of 20% for TV and 40% for film (for qualifying Australian productions only)
- 30% Post Digital & Visual Effects Offset (PDV)
- 16.5% Location Offset (LO) for footloose international production investment in Australia; and the
- Location Incentive (LI) top-up scheme for qualifying footloose international production investment in Australia
- The Location Offset, PDV Offset or Producer Offset cannot be combined

⁶ <https://www.paulfletcher.com.au/media-releases/joint-media-release-epic-bestseller-shantaram-to-film-in-victoria>

⁷ <https://screenqueensland.com.au/sq-news/on-screen/paramount-pictures-monster-problems-to-film-in-queensland/>

⁸ <https://screenqueensland.com.au/sq-news/media-centre/media-release-dora-opens-on-the-gold-coast/>

A well-functioning incentives scheme is important and unavoidable to ensure the ongoing viability and success of the Australian production sector.

Set up correctly, production incentives should encourage a healthy balance of investment in Australian content along with major international film and TV production. The current mix of federal incentives does not adequately meet these two purposes.

Encouraging more investment in global content filmed in Australia creates a consistent pipeline of jobs for Australian actors, writers, directors and producers which allows them to make a global career here at home. Australia should want to keep its best and brightest talent at home; and attract the best and brightest overseas talent too.

A more consistent pipeline of overseas investment broadens the opportunities for our creative talent that will have flow-on benefits for local stories too. It will also encourage investment in more film infrastructure over the long-term.

The submissions of *Free TV Australia*, the *Motion Pictures Association (MPA)*, *ANZ Screen Association (ANZSA)* and the *Australian Subscription Television & Radio Association (ASTRA)* each talk in detail about proposals to make the incentives fairer and more attractive for the production of local and overseas content in Australia. ViacomCBS strongly supports these proposals.

A Location Offset of 30% to be globally competitive

Australia has suffered from decades of inconsistent policy settings for inbound investment in film and television production. This has stymied the ability of the sector to grow and diversify and limited the opportunities for our best and brightest talent, forcing many to head overseas.

In recognition of this the Australian Government implemented the Location Incentive (LI) in July 2019 that offered an offset rate of 13.5% which, when combined with the Location Offset (LO) of 16.5%, provided a 30% offset for eligible foreign film and television productions.

According to *AusFilm*, the incentive scheme has delivered \$900 million worth of additional foreign investment in the Australian production sector.⁹

However, the LI was limited to 4 years and \$140 million of funding, which within just 12 months has almost been completely allocated. Just \$18 million remains in the scheme with three years still to run.

In an interview on 6 June 2020, Kate Marks, CEO of *AusFilm*, said that the agency has recently received over \$900 million worth of new enquiries from 18 Hollywood-backed projects in film and television looking to bring production to Australia.

However, Australia faces enormous competition for this investment from other very active countries such as Canada, the United Kingdom, New Zealand and Hungary, as well as a number of states within the USA, such as Georgia.

The Location Incentive has clearly proven there is high demand to bring foreign production to Australia, but while the scheme is welcome, a further top-up of the LI would be sub-optimal.

Instead, the Government should permanently increase the Location Offset to 30%.

A permanent increase to the Location Offset to 30% sends a clear signal that Australia is open for business and keen to compete for jobs and investment. It provides certainty and helps production companies plan a pipeline of activity over several years.

Reduce the Location Offset thresholds

ViacomCBS also strongly recommends that the investment thresholds for the Location Offset be significantly reduced. This is particularly important for television production.

Each year ViacomCBS develops many programs that would not meet the current thresholds of \$15 million total expenditure nor the \$1 million QAPE per hour average spend.

⁹ <https://www.aph.gov.au/DocumentStore.ashx?id=9458199d-759f-48a6-a2e3-894c56e68bc6&subId=670707>

This is depriving the Australian economy and production sector of potentially thousands of jobs and millions of dollars of investment. What adds to the value of these programs is that, if successful, many can last several seasons, delivering more secure employment opportunities.

At the very least, ViacomCBS recommends that Australia match the New Zealand minimum spend requirement of NZD \$4 million for television productions with no QAPE per hour requirement.

A flat rate Producer Offset (PO) for both film and television content

The PO currently unfairly separates film and TV production into two rates, 20% of QAPE (Qualifying Australian Production Expenditure) for TV and 40% for film. That's despite the fact that major television productions now rival film for costs. In fact, per project they can be significantly more expensive as television series regularly last several seasons.

Analysis conducted by PwC for the *Australian Subscription Television & Radio Association (ASTRA)* in 2015 found that increasing the PO offset to 40% for eligible TV productions would cost the Government an additional \$15.5 million but would generate an additional \$119.4 million in economic activity and create 360 new jobs.¹⁰

ViacomCBS supports the view that the PO should be set at a flat rate for both film and television production. The optimal rate to support Australian stories and jobs is 40% given the clear evidence of the benefit for the Australian economy and the increasing difficulty for broadcasters to successfully monetise local content.

However, should the Government be inclined towards a flat 30% for both film and tv (as some stakeholders argue) then an additional 10% loading should be made available for certain culturally significant genres, such as children's programming, making it more appealing and viable to produce.

Broaden the Producer Offset to support a greater diversity of content

The PO should also not discriminate between different jobs in the production sector or different content types that meet the diversity of Australian viewer tastes. More program genres, such as observational documentary, music, lifestyle and reality programming, should be eligible to apply for the PO.

These programs are big job generators and offer a rich diversity of opportunity for writers, producers, directors and more. Many of these locally produced programs become international hits, such as *Bondi Rescue* and *MasterChef Australia*, helping to spread Australian culture to the world. Their production budgets can sometimes far exceed those of many dramas. This should be recognised and supported via the PO.

There is a strong case to at the very least align the qualifying genres with those eligible under the Location Offset. This would remove the anomaly that a foreign reality series can be produced in Australia and qualify for the Location Offset and Location Incentives at a combined 30% offset, whereas an Australian reality series produced on home soil does not qualify for the Producer Offset. For example, *Network 10* has announced that due to the COVID-19 pandemic that production of the latest series of *The Amazing Race Australia* will be filmed across Australia. It does not qualify for the Producer or Location offsets. Conversely, if it were *The Amazing Race America* being filmed in Australia, it would qualify for a 30% offset of production costs. Fixing this anomaly could encourage networks to bring back other Australian reality shows currently filmed overseas creating hundreds of additional jobs and millions of dollars in ongoing local investment.

ViacomCBS also supports the recommendation of other stakeholders, such as SPA and Free TV Australia, for the Producer Offset to also be made available for a broad range of light entertainment series.

For as long as Australian content broadcast quotas remain in place, the PO should be expanded to cover these popular content genres in recognition of the changing market dynamics and extreme cost and revenue pressures faced by commercial FTA and subscription television broadcasters.

Reduce the Producer Offset expenditure thresholds to further encourage content creativity

Current qualifying expenditure thresholds must also be reduced. There is no evidence to support the current thresholds, in fact, all they do is prevent creativity and job creation.

¹⁰ https://www.astra.org.au/pdf/news/FINAL_ASTRA_Sub_Industry_viability_310317.pdf

At the very least, the Government should set a lower rate of \$150,000 QAPE per hour for all formats. The minimum total QAPE threshold should be removed entirely as it is largely redundant.

It is our view that significantly reducing the QAPE threshold and removing the minimum total spend, would see significant increases in production investment, which the PwC analysis reveals would provide enormous dividends to the economy.

Remove the Producer Offset 65 Episode Cap

The 65 episode cap on access to the PO should also be removed as it unfairly penalises successful programs and has forced several successful dramas to cease production, including popular drama on Network 10 that consequently became unaffordable.

The cap had been implemented because it was argued that the cost of a drama series reduced in subsequent seasons. However, the experience of ViacomCBS is that costs of production do not diminish during the life-cycle of a drama series.

In fact, costs consistently increase over the lifetime of a production due to factors such as increasing salaries and contracts required for both on and offscreen talent.

While filming costs also remain high because in most cases each set location is unique to a particular drama production, therefore it is not possible to utilise a multi-purpose studio lot that may otherwise offer cost advantages over time.

Conclusion

The recommendations by ViacomCBS in this submission are in line with the views of multiple stakeholders across Free to Air and Subscription Broadcast TV, SVODs, major international production companies and the Australian production sector.

If implemented, ViacomCBS is confident that the Australian production sector will strengthen and grow, opening up enormous opportunities for Australia's talented creative arts and entertainment sector. It will also ensure that Australian consumers have a vibrant ecosystem of diverse Australian and global content across multiple platforms.

ViacomCBS would be happy to further assist the Government as it finalises any reforms.

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About ViacomCBS Networks International

ViacomCBS Networks International, a unit of ViacomCBS Inc. (NASDAQ: VIAC), is comprised of many of the world's most iconic consumer brands. Its portfolio includes Network 10, Channel 5, Telefe, Viacom International Studios, Nickelodeon, MTV, Comedy Central, BET, Paramount Network and Pluto TV among others. In addition to offering innovative streaming services and digital video products, ViacomCBS Networks International provides powerful capabilities in production, distribution and advertising solutions for partners on five continents and across more than 180 countries.

About ViacomCBS

ViacomCBS (NASDAQ: VIAC; VIACA) is a leading global media and entertainment company that creates premium content and experiences for audiences worldwide. Driven by iconic consumer brands, its portfolio includes CBS, Showtime Networks, Paramount Pictures, Nickelodeon, MTV, Comedy Central, BET, CBS All Access, Pluto TV and Simon & Schuster, among others. The company delivers the largest share of the U.S. television audience and boasts one of the industry's most important and extensive libraries of TV and film titles. In addition to offering innovative streaming services and digital video products, ViacomCBS provides powerful capabilities in production, distribution and advertising solutions for partners on five continents.