

TELETEXT LTD

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1 WHO IS TELETEXT LIMITED

- 1.1 **Teletext Limited** (Teletext) is a UK company providing on-screen information services principally aimed at consumers, comprising of up-to-the-minute, comprehensive content across multiple delivery platforms including analogue, satellite and digital terrestrial television, the PC internet, and mobile phones via SMS.
- 1.2 Teletext replaced 'Oracle' as the ITV public Teletext licensee starting broadcasting on the 1st of January 1993 and rapidly established itself as a household name. Available in over 81% of households, it is viewed by over 17 million people every week. Output from Teletext appears on ITV, Channel 4 and Channel 5.
- 1.3 In 1996, Teletext launched its website Teletext.co.uk that has had an average of 5 million monthly page impressions.
- 1.4 In 1997, Teletext launched its digital service that appeared on ITV digital (now Freeview), satellite (Sky) and until 2004, cable television.
- 1.5 In 2004 launched the Teletext Holidays Television Channel
- 1.6 In 2004 Teletext agreed a deal with Channel 4 to provide a commercial and editorial text service on Channel 4 digital
- 1.7 In March 2005 Teletext launched a classified car service.
- 1.8 In June 2005 Teletext began a new, 10-year deal with ITV, bringing its commercial and editorial text service to ITV's digital channels
- 1.9 Teletext content also appears on mobile phones, which includes SMS. A number of key Teletext content areas could be found on Teletext WAP services, including news, sport, finance and holidays between 2000 and 2002 when the service was dropped. The SMS service allows mobile users to receive Teletext information on demand with the control and flexibility to ensure that they only receive targeted information when they need it.
- 1.10 Sales promotions are carried out by our marketing department, as well as appearing on all Teletext platforms from our commercial and editorial departments and these are entered into the systems and placed to air by Teletext itself.

2 COMMERCIAL CONTROLS

- 2.1 Teletext is a public service broadcaster in relation to its analogue and digital terrestrial television platforms and the content of those services is prescribed by Teletext's licence issued by Ofcom. Editorial content is produced by staff journalists and by external information providers such as the Press Association (PA). Commercial advertising is split into holidays, sport and general display copy, all serviced by dedicated teams of sales and updating staff. Independent companies supply broadcast commercial content to Teletext.
- 2.2 Ofcom and the Advertising Standards Authority who investigate complaints regulate the majority of Teletext content. The web is regulated through the Advertising Standards Authority. In addition,

bodies such as Trading Standards, the Gaming Board and the Financial Services Authority (FSA) have regulatory responsibility over our commercial content.

2.3 Teletext takes its role as a public service broadcaster and reliable information provider very seriously indeed. Not only is there a Compliance Director reporting to the company board on compliance matters, there is also a dedicated Commercial Compliance Team of 8 employees acting independently of Sales, Marketing, Production and Editorial staff. This team clears copy to air, carries out systematic audits of advertising and ensures that all copy complies with the relevant regulatory controls.

2.4 The **Teletext** Commercial Compliance Team monitors advertising copy and tests offers to make sure advertisers remain compliant once cleared for broadcast. Monitoring of advertising can result in a range of sanctions where advertisers do not uphold the high standards expected. Sanctions range from advice designed to ensure compliance, through warnings to (in extreme situations) exclusion from advertising.

3 COMMENTS ON THE DRAFT 11th EDITION OF THE ICSTIS CODE OF PRACTICE

Teletext welcomes the proposed amendments to the code particularly in the areas of subscription services and the protection of children/underage users. Overall Teletext agrees with the additions made and wishes to make the following comments:

Section 1 – Question 6

Teletext strongly disagrees with the relaxing of PRS regulations in areas where the risk of consumers appears to be minimal. Teletext believes that due to the speed at which technology is developing a low risk area could very quickly become a cause for concern; therefore the safe option would be a status quo.

Section 2 – Question 2

ICSTIS may also want to consider requesting credit facilitator and banking details. This is now standard practice at Teletext and has proved valuable in maintaining our brand image.

Section 3 – Question 1

Teletext regularly utilises the ‘help notes’ and finds them a necessary and functional addition to the code. We have no objection to the style of the current ‘help notes’, however on the topic of premium rate promotions Teletext would welcome ICSTIS providing examples of best practice promotions as well as examples that would fall fail of the code.

Section 3 - Question 2

Teletext would welcome increased guidance from ICSTIS on how to comply with its code. Teletext recommends that clear guidance should be available on what is acceptable and what is not rather than a cut and paste from the code.

ICSTIS may also wish to consider running a series of master classes where specific areas of the code are examined.

Section 3 - Question 3

Teletext recommends that ICSTIS provide industry groups with a ‘best practice guide’ to creating notes on code compliance. ICSTIS may also wish to consider a system where by these notes can be endorsed/approved by ICSTIS.

Section 5 - Question 2

Teletext would welcome the introduction of age verification for Internet services as this is and will continue to be a high risk area.

Teletext agrees that further consultation in this area is required; however we would also welcome a more general discussion on age verification throughout the premium rate industry.

Section 5 - Question 7

Teletext agrees with this recommendation and would like to see this extended to other areas of the code.

Section 5 - Question 8

Teletext recommends that pricing proximity requirements should stay in the main code but be supplemented in an appendix or help notes with clear graphic examples of what is acceptable.

Section 5 - Question 9

Teletext strongly disagrees that pricing information should be spoken as well as displayed. Teletext believes ICSTIS need to be more prescriptive in its code to counter the level of complaints.

Teletext recommends that scrolling pricing information and other important information that will effect a decision to buy a product or service be banned.

Teletext would welcome clarification on whether this rule applies to text services such as Teletext. If this is the case it would very difficult for Teletext to comply due to technical difficulties. If the rule is not intended to apply to text services can this be stipulated in the code? ICSTIS may also wish to consider how this rule will apply to interactive services.

4 FURTHER COMMENTS ON THE DRAFT CODE

7.3.2 & 7.3.3

Can ICSTIS clarify what it means by “reasonable endeavours”? Would a warning message/statement be regarded as a reasonable endeavour? Teletext believes ICSTIS need to be more prescriptive.

7.3.4

Can ICSTIS clarify if the conditions stated in a-c need to be stated in promotional material?

5 ADDITIONAL COMMENTS

Mobile Phone Recycling

For the past 18 months Teletext has received high levels of complaints due to mobile phone recycling. Teletext recommends that ICSTIS documents clear guidelines on this activity including sanctions for those that do not comply.

User friendly code

Teletext believe it is a common failure of most regulators that their code of practice/guidance notes can only be accessed in PDF or booklet format, meaning it is very difficult at a quick glance to find what you are looking for. Teletext would very much welcome the introduction of a search facility on the ICSTIS website where key words such as ‘pricing’, ‘children’, ‘virtual chat’ etc. are searchable and able to bring up all occurrences throughout the code, help notes and latest news etc. Teletext has introduced a similar system with it own code with overwhelming success.

