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ANDREW HALL
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4th October 2010

Dear Ms. Ang:

Response to Consultation on Preliminary Policy Positions dated 1st September 2010

NBC Universal is one of the world's leading media and entertainment companies in the development, production and distribution of films, TV programming and news to a global audience. We remain deeply concerned at the Media Development Authority's (MDA) desire to push ahead with mandatory cross-carriage of content ("Remedy"), despite the fact that content owners involved in the consultation process in Singapore are absolutely opposed to the plans.

The latest iteration of the Remedy is in our opinion a further step backwards by the MDA. We firmly believe that the Remedy is unnecessary given the imminent availability of single set top box technology and that it contravenes the intellectual property rights of content owners. Furthermore, as proposed, the Remedy will lead to forced unbundling of channels and a *de facto* ban on exclusivity. Content owners, whose products, services and expertise have contributed greatly to a flourishing pay television market in Singapore, are being unfairly treated.

NBC Universal is fully committed to the Cable and Satellite Broadcasting Association of Asia (CASBAA) appeal against the Remedy and is also firmly behind all representations made by the Motion Picture Association (MPA) in this matter. As these submissions make clear, rather than "fine-tune" mandatory cross-carriage, the latest consultation paper confirms MDA's intention to intervene with regulations that are unprecedented in other developed markets and which run counter to rights owners' intellectual property rights.

We very much appreciate the opportunity to offer our views. We urge the MDA to revoke the Remedy to avoid damaging Singapore's vibrant pay television market. As with CASBAA, we remain ready to continue discussions with the MDA, either through that association or directly.

Yours sincerely

Andrew Hall
Senior Vice President
NBC Universal International

cc.
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