

Individual Respondent

Industry Consultation on DPPS

I am contributing feedback in my personal capacity as an interested individual with more than 10 years of experience with major organisations managing Out-of-Home media businesses, including digital signages in shopping malls, lift lobbies and common spaces in HDB estates, office buildings, bank branches, hospitals and clinics, and on building facades. I am currently a consultant providing media training and business advisory services.

While I support the proposed move by the IMDA to introduce a new Broadcasting Class Licence for DPPs, I advocate a measured approach so that while the objectives of this initiative are achieved, it would not add additional burden on DPP operators and their stakeholders. Having said, my primary concern and focus is with DPPs in HDB estates, given their increasing numbers and the wide reach they have to the population and young children.

Public Service Broadcasting

In addition to requiring DPPs in lift lobbies of HDB estates to serve PSB messages, I propose to include also DPPs in common spaces of the estates, such as sitting areas in void decks of HDB estates, walls and columns next to pre-schools and kindergartens in void decks of HDB estates, food centres and wet markets, and coffee shops (excluding TV screens set up by the owners for cable and FTA screening). (I believe in some of the current installations in certain Town Councils, the operators have been given the flexibility to locate the DPPs in locations other than lift lobbies.) The rationale is these DPPs have high reach to residents in the estates and would enhance public service messaging in peace time and during emergencies.

Anti-Healthy Lifestyle Ads

Aside from health-related products and services, I propose barring ads of products and services that work against government efforts to promote healthy lifestyle, given the high costs of disease prevention and cures. For example, ads on fast foods, sugar drinks, and other similar edible items should be listed under Impermissible Content. Alternatively, such ads, if allowed, should bear cautionary messages within the copy or immediately after the ad is displayed. For eg, in the Netherlands, ads for sweets and candies must include a toothbrush at the end of the ad to remind children to brush their teeth after eating sweets. In extremis, all advertising aimed at children is banned in Norway and Sweden, while in France, a child may not appear as the spokesperson in a commercial.

Tuition Centres

With the pressure on our children to perform well in schools already at a high level, there should not be additional pressure on parents and children from ads by tuition centre operators on the DPPs in HDB estates. I cite an enlightened policy from Our Tampines Hub, which does not allow such ads on its premises, despite it being a popular location to target parents. With the physical presence of tuition centres already prominent in shopping malls and retail areas of HDB estates, I do not feel it's necessary to open up the DPPs in HDB as another pressure point on parents and children.

Sex and Nudity

I feel the guideline has to be spelt out in clearer terms. For example, as most, if not all, lingerie and undergarment ads employ the use of models to showcase the products, it is inevitable that parts of

the human anatomy design private would be displayed. Such ads should be clearly listed as Impermissible Content for DPPs located in HDB estates, given their exposure to young children. The same principle applies to sexually suggestive and explicit love scenes in movie trailers.

Coarse Language, Horror and Violence

Although movie trailer ads may have been vetted by the authorities before they are allowed to be aired in Cinemas, the same trailers may not be suitable content for DPPs in HDB estates, given there are usually depictions of violent scenes in action movies and terrifying scenes in horror movies that could be traumatising for young children, especially when unaccompanied by adults. I propose that movie trailers be selectively listed as Impermissible Content.

Race and Religion

As race and religion are sensitive issues, the content on DPPs, in general, and DPPs located in HDB estates, in particular, should be safeguarded from intentional or unintentional slurs and discrimination. For example, product ads that promote skin whitening, while appearing innocent on the surface, can be controversial in a multi-ethnic society where darker skinned people could find the messaging offensive. The concern here extends beyond paid ads to other forms of free content sourced from the Internet, such as unsavoury user-generated content from YouTube, that DPP operators may broadcast without discretion. Who should police what goes on air is a difficult question? Should it be the IMDA, the landlords and premises owners, or the DPP operators? Rightfully, that role should belong to DPP operators, or shared with the landlords, though misjudgements are known to have been made by operators either because they are shorthanded, lacked the expertise, or blinded by advertising revenue.

Age and Gender Discrimination and Stereotyping

This is an area that has not been mentioned in the consultation paper. As the Singapore population ages and values such as filial piety and respect for the elderly are under threat, ads that discriminate or stereotype the elderly should not be encouraged. The same goes for ads that undermine women and their contributions. I propose this as an additional sub head under Impermissible Content.

Intrusive Advertising

Some netizens have expressed concerns about the intrusiveness of the DPPs in HDB estates. One commentator lamented that residents are subjected to barrage of ads involuntarily even while they are waiting for the lift to get them home. One way to ameliorate the concern is to cap the commercial advertising airtime to a reasonable percentage of the total airtime, or suspend ads during certain time belts of the day. There are software solutions to achieve this, or it can be left to the integrity of the DPP operator to operationalise and monitor it.

Having said, ads are perceived to be intrusive when they are irrelevant to the audience, displayed repeatedly ad nauseum, or the content is annoying. We have all been subjected to such situations occasionally. Imagine when a person has to face the ad multiple times every time, every day, without alternative or reprieve. These are factors that DPP operators should bear in mind if they hope to build a sustainable relationship with the audience. One solution may be to require DPP operators to control the frequency of display of the same ad in a loop or cycle, or have a variety of relevant, interesting content to keep the DPPs fresh.

Conclusion

The licensing requirement for DPP operators is a new uncharted territory for IMDA as well as industry stakeholders. Regulations aside, there should be measures to encourage the healthy development of DPPs generally. With the right incentives, training and investment, DPPs can play a meaningful role in the development of the Smart Nation.