

COMMENTS ON IMDA'S PROPOSED NEW BROADCASTING CLASS LICENCE FOR OPERATORS OF DISTRIBUTION NETWORK DIGITAL DISPLAY PANELS

On Fair Application

1. [Part 2: Clause 7] We would like to suggest that the new Class Licence also covers other media assets operating within public domain such as in bus interchanges, train stations, bus shelters, public walkways, HDB commercial buildings, neighbourhood shopping complex, food courts, community centres, shophouses, polyclinics, hawker centres and not be confined to the Digital Boards in lifts and at lift lobbies of flats.

The Class Licence should also apply to DDPS in public areas where content is “pushed” to residents as well. Many of these areas receive higher footfall than a HDB block.

This would then be better in line with the key objective of the Licence, which is to regulate content on Digital Media Assets that can transmit and update information and are prevalent in areas where members of public – including young children - have easy access.

2. [Part 2: Clause 8] Why are vendors with more advanced technology being governed under the new ruling, whereas those which still practices manual methods are exempted?
3. [Part 2: Clause 15] Why is the requirement to broadcast PSB programmes only limited to operators of Distribution Network DDP in HDB residential flats, and not operators of the same assets within other public residential location.

Those assets could also serve communication needs for public messages to HDB residents and would have significant influence on shaping the residential nature of the estates, e.g.: Bus Shelters in which residents from feeder bus services would alight and view closest to their homes.

4. [Annex 1.2] Why are advertisements on health-related goods or services not permitted on DDP operators but allowed on many other media that is also accessible by the public?

There is a variety of health-related supplements, topical creams, TCMs products (Salonpas, bird's nest, essence of chicken) that appears in bus shelters found in public residential areas.

Could IMDA identify which aspects of the health-related goods and services are not permissible, e.g. massage, spa, new age health therapy, etc to provide clarity?

5. [Annex 1.4] Why are local TV programmes, which would have been regulated under a separate Class Licence, be allowed to be shown on DDP?
6. [Annex 2.11] Why are Chinese dialects not allowed when it is allowed on Free-to-air TV Channel 8?

On Regulation

7. [Part 2: Clause 7] Beyond the new Class Licence and Content Code, what are the rules of the Broadcasting Act that would directly be applicable to operators of DDP? It would be good to have clarity in order to avoid unintentional infringement.
8. [Part 2: Clause 19] What are the detailed penalties if the vendors flout the rules?
9. [Part 2: Clause 15] Will IMDA or the eventual government source of the PSB content be responsible for the legality, permissibility and compliance to the Code?

We suggest changing the clause such that Operator need not be responsible for those content. Operators appear to be obliged to carry such PSB content provided by the Government, yet the onus of compliance would fall solely on the operator who may not be in a position to decline.

10. [Annex 1.2] In denying publicity or promotion of health-related goods or services, this would have an impact on advertising for approved health supplements, legitimate and useful medical screening services, or those concerning sports and fitness, which could truly benefit the residents. We would like to suggest removal of this restriction.

This clause would also prohibit promotion of events/goods/services – paid or free – that concerns the usage/attendance/participation for members of public in which they could improve their health and well-being.

On Business Viability

11. [Part 2: Clause 16] With the stipulation for 50% of the duration of each loop of the content displayed, it will adversely affect the business viability of the advertisers with a pre-emptive curbing on revenue potential through the reduction in commercial spots. Would IMDA revise this lower?

On Content

12. [Part 2: Clause 13] We would like to suggest that the criteria for commercial ads content take reference from existing guidelines for ads that are allowed in the bus shelters.
13. [Part 2: Clause 15] Will IMDA provide advice on the content management workflow and coordination process for the PSB content provided by the Government? The procedure has to be aligned to avoid operation disruptions and to avoid incurring operational expense due to new legislation which was not factored for in operator's business planning.
14. [Part 2: Clause 15] Could IMDA list the government bodies that would be providing the 50% content and shed light on the prioritisation process? Could IMDA state the content selection criteria such as strategic nation-wide imperatives, island-wide critical emergencies, narrowcast campaigns targeting only niche audiences?
15. [Part 2: Clause 15] Can the operator provide the PSB content in this 50%, if the PSB content provided can fulfil the parameters and meets public communications objectives?
16. [Part 2: Clause 15] We would like to suggest the following parameters on the 50% that can balance public communication needs and ensuring residences acceptance.
 - a. The 50% for PSB content cannot be used for publicising commercially sponsored events/programmes/campaigns nor have content that contains branding (written or visual) of commercial organisations; this reduces the elements of commercialism which adds to residents' acceptance.

- b. That 50% should include news headlines or news features – beyond government messages - sourced from reliable sources; this is a crucial value-add that ensures residents will proactively look at the screen to gain knowledge that enriches their lives and keep them well-informed.

----- END OF COMMENTS -----

COMPANY DESCRIPTION

Target Media Culcreative is an associate company of Singapore Press Holdings that operates an advertising service business through a network of digital media screens in lifts and lift lobbies of residential and commercial buildings.