



September 30, 2024

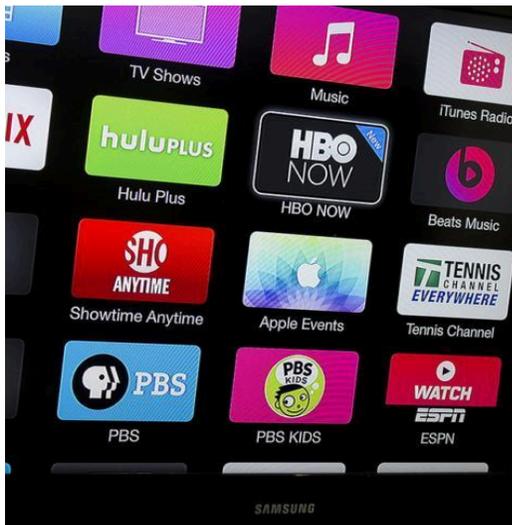
The Manager
Content and Media Reform Section
Australian Communications and Media Authority
Belconnen, Australia ACT 2616

Dear Officeholder

Submission - ACMA Prominence Framework

We refer to your consultation paper and call for submission and evidence.

The Connected TV Marketing Association (CTVMA) is the global industry trade body of the advertising, media and entertainment sector, established to educate industry professionals in the commercial opportunities of Connected TV platforms. The CTVMA is an international body with members throughout the UK, Europe, Australia, Asia, Canada, and the USA.



Our trade organisation was founded in Australia by Samsung, Accedo, Telstra, NBN Co, SBS and BBC Worldwide conducts research as well as advocacy work in the sector on behalf of its members and previously made a submission to the Commonwealth prominence consultation in December 2022.

ACMA Submission Prominence

In response to your consultation, we make the following observations and suggestions with our comments, as follows;

Question 1

The CTVMA supports the ACMA balanced approach that ensures ease of access for Australian free-to-air TV services on connected TV platforms in accordance with our Policy Guide and Constitution, while respecting commercial agreements with app providers.

To assist your approach, the CTVMA proposes that the list of applications, SDKs and technical specifications for Australian BVOD and SVOD services could be published and administered on the CTVMA Australian website. This would serve as a centralised and accessible catalogue resource for FTA broadcasters, app developers, and device manufacturers, ensuring transparency and uniformity across platforms.



By maintaining an up-to-date list with our glossary, the CTVMA could facilitate easier compliance with ACMA's prominence policies while also allowing stakeholders to verify technical requirements to ensure their apps meet the necessary standards for smart TV installation.

Our platform would serve to enhance collaboration and consensus between stakeholders to help the industry ecosystem navigate regulatory expectations more efficiently.

Question 2

A focus on audiovisual content should define regulated devices, ensuring clarity for manufacturers.

Question 3

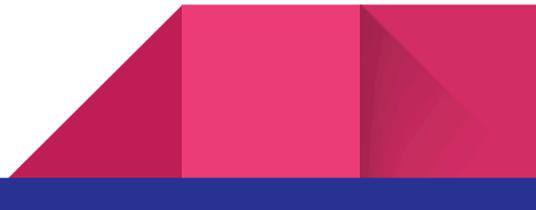
Smart monitors and projectors could also be evaluated as they increasingly offer TV-like features, aligning with CTV's growth in multi-purpose devices.

Question 4

Yes, clarity is needed to distinguish between devices like smart monitors, which may fall under TV-like use cases but are primarily used for other functions.

Question 5

The interface should extend beyond the static landing page to accommodate scrolling and different interface types to enable flexibility for manufacturers.



Question 6

These should be treated differently, as their function is primarily curating content across services, thus requiring separate consideration.

Question 7

Current contracts with SVOD providers may limit space on the home screen, impacting how BVOD apps are featured.

Question 8

Yes, the ACMA should provide clear definitions to avoid ambiguity and ensure that all parties have clear guidelines.

Question 9

We are encouraging more stakeholder transparency to benefit the industry, ensuring manufacturers and service providers understand which apps are available across devices.

Question 10

A manufacturer might reject an app due to technical incompatibility, outdated specifications, or lack of timely updates.

Question 11

Yes, BVOD and SVOD apps might need separate criteria, particularly where technical and licensing agreements differ.

Question 12

In the instance of free-ad-supported streaming television single IP channels by advertisers, the CTVMA could assist the ACMA in gathering industry data on the different circumstances in which to consider regulated television services.

ACMA Submission Prominence

In response to your consultation, we make the further observations and suggestions with our comments in evidence, as follows;

Call for Evidence 1

The CTVMA can provide the ACMA with catalogue data on the app positioning and home screen prominence of Australian broadcasting apps across various smart TV platforms to ensure that BVOD apps are easily discoverable and accessible.

Call for Evidence 2

The CTVMA can collect and report on the current app listings and their prominence on connected TV devices, helping identify any discrepancies in the availability of Australian services on different devices. This would support efforts to create a standardised approach to app accessibility.

Call for Evidence 3

The CTVMA can gather feedback from its members, including broadcasters, platforms, and app developers to reach certification standards in ensuring compliance with ACMA's prominence policies.

Call for Evidence 4

The CTVMA works with manufacturers on app integration and compliance, particularly when adapting BVOD services for various platforms, and could share these findings with ACMA to support your evidence-based policymaking.

Call for Evidence 5

The CTVMA could assist by collecting data on the costs of compliance for app developers and manufacturers and by facilitating discussions to standardise technical requirements for app integration with our members.

In addition, these recommendations could further be served under the ACMA guidelines for consideration of an industry Streaming Code of Practice legislative instrument, together with our inclusion to participate in the Future of Broadcasting Working Group.

These efforts will allow the CTVMA to support the ACMA's prominence framework while promoting industry collaboration under our Policy Guide and Constitution.

We look forward to assisting you in the implementation of the policy framework.

Yours faithfully,

Connected TV Marketing Association

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