To whom it may concern,

Screen Australia.

Thank you for the opportunity to respond to the Draft Guidelines: Convergent Television, All Media Funding.

I wanted to start by saying I believe that there are a number of really good changes in this document and appreciate all the energy that goes into changing the programs.

I am going flag a handful of comments and concerns which I hope would be considered.

The first, I consider to be rather important. The threshold increase in license fee to \$100,000 per half hour episode of Children's television seems to be out of step with a) what all the commercial free broadcasters are generally paying and b) the vast majority of the ABC commissions c) all the cable commissions. Even the current level of \$95,000 is quite a rare license fee to achieve. Has this proposed change been considered based on feedback from Producers or Broadcasters in the industry or is this based on an internal proposal? I don't believe this will have a desired effect to increase the broadcaster contribution. I actually believe if you did the reverse and dropped the requirement to \$75,000 the ABC and Commercial networks might bump up their license fees that often hover around \$50,000.

The second point is in regards to All Media Funding. I have a few concerns I wanted to flag. Firstly, while on the surface it appears that there is an increase in budget for Innovative projects, it seems that the definition of cross media webisodes and tv content that can be streamed online, as a component that can access these funds seems out of step. The danger is that rather than focusing on Innovative and cutting edge audience focused deliveries, there is a fear that effectively lower cost linear production is part of this bucket; this content is not innovative and should likely compete in the normal linear production funds.

Secondly, I of course support the notion that interactive projects under \$200,000 are offered as a grant. I would ask that you consider the 1% copyright held by SA begin at \$200K instead of \$100K. The reason for this, is that in the interactive space almost all publishers require that the producer has 100% copyright in their project. Many international co-producers also require this to be the case. The 1% copyright potentially adds a level of accounting and bureaucracy without any real results.

Thirdly, in the All Media Category it refers to supporting PC games. I think this is very much a dead market at the moment and wonder why we single out that specifically. Given the speed of change, I wonder if we could simply remove that reference while recognizing that SA does not support Platform Games (ie XBOX, PS3, Wii) through this initiative.

Thanks for the opportunity to feedback some thoughts.

Please contact me at your leisure if you wish to follow up on any of these notes.

Kind Regards,

Dan

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