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MS23-003089

**Australian Government****Department of Infrastructure, Transport,
Regional Development, Communications and the Arts****To: The Hon Michelle Rowland MP, Minister for Communications** (for information)**Subject: Media Reform – Policy Background Paper: Advertising Restrictions**

s22(1)(a)(ii)

The Hon Michelle Rowland MP

29.6.23

Date:

Comments:

Pls discuss w/MO in context of past response to
online gathering, giving a broader media reform agenda.

s22(1)(a)(ii)

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4. We note advertising restrictions have recently been a topic of interest in the news, particularly in relation to gambling, alcohol, unhealthy food, and political advertising ahead of the referendum for an Indigenous Voice to Parliament.

- a. Senator David Pocock reportedly (Canberra Weekly, 21 February 2023) met with experts to discuss possible reforms to restrictions around gambling, alcohol and unhealthy food advertisements on social media.

s22(1)(a)(ii)

department to focus on through these papers.

Stakeholder Implications: Nil

Consultation: Nil

Attachments:

Attachment A: Advertising Gap Analysis Paper

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 Division: Online Safety, Media and Digital Platforms
 Mob: s22(1)(a)(ii)
 Date: 27/02/2023

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Australian Government
Department of Infrastructure, Transport,
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Policy Background Paper: Advertising Gap Analysis

Contents

s22(1)(a)(ii)

4	Why is advertising regulated?	5
5	How is advertising regulated?	6
5.1	Self-regulation	6
5.2	Statutory requirements	6
5.3	Delegated legislation	8
5.4	Co-regulation	8

s22(1)(a)(ii)

s22(1)(a)(ii)

Appendix A – Advertising restrictions across mediums	21
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s22(1)(a)(ii)

4 Why is advertising regulated?

s22(1)(a)(ii)

For these and other reasons, restrictions have historically been placed on advertising, and specifically on the advertising of certain products and services. Advertising restrictions provide consumer safeguards for vulnerable and impressionable audiences. Restrictions can limit the advertising of specific products and services, restrict the frequency and content of ads shown before, during and after children's content, and restrict the content of advertisements. The advertising of alcoholic beverages, tobacco products, betting and gambling, and election advertising are all subject to advertising restrictions.

s22(1)(a)(ii)

s22(1)(a)(ii)

5 How is advertising regulated?

5.1 Self-regulation

Advertising industry bodies have developed self-regulatory codes to ensure that the content of advertisements reflects community standards. Of particular relevance are the codes created by the Australian Association of National Advertisers (AANA), the national peak body for advertising. AANA codes apply to all consumer advertising and marketing communication, whether or not the advertiser/marketer is an AANA member.

The AANA manages five advertising self-regulatory codes:

Australian Association of National Advertisers (AANA) is the peak national body for advertisers, representing the interests of all organisations involved in Australia's advertising, marketing and media industry. The aim of the AANA is to promote and safeguard the rights of its members, while promoting responsible advertising and marketing practices through self-regulation. The AANA develops, reviews and updates advertising codes while its sister body, Ad Standards, adjudicates complaints made by members of the public.

s22(1)(a)(ii)

- **Wagering Advertising & Marketing Communication Code** – regulates how wagering products or services are advertised including betting activities and sporting events (excludes gaming, lottery and casino games).


s22(1)(a)(ii)

5.2 Statutory requirements

The *Broadcasting Services Act 1992* (BSA) establishes the regulatory framework for broadcasting and some online media services. However, the BSA's regulation of advertising is restricted to a number of specific types of advertising. With the exception of wagering advertising, the BSA's advertising restrictions only apply to

broadcasting services, and not to online services. In this regard, not all content or advertising provided by broadcasters is considered to be broadcasting.


s22(1)(a)(ii)



The only exception to this approach relates to gambling advertising during live sports, which is governed by the *Broadcasting Services (Online Content Service Provider Rules) 2018* (detailed in the following section).


In terms of primary legislation, the following requirements are applicable to advertising:

s22(1)(a)(ii)



- **Interactive gambling:** The *Interactive Gambling Act 2001* prohibits the broadcasting, datacasting or publishing of designated interactive gambling service advertisements, which includes putting the advertisement on a website. It covers all gambling that takes place online, through a website or app, and via a telephone.

s22(1)(a)(ii)



5.3 Delegated legislation

The BSA empowers ACMA to make a range of delegated or subordinate legislation, including licence conditions, codes, standards, and rules.²⁸

Some of these powers are broad and can be used on any given class of broadcasting licence, while some are specific to particular issues, such as a standards-making power specifically in relation to Australian content on commercial TV.²⁹

The following subordinate legislation is specifically relevant to advertising:

- **Online Content Services Provider Rules:** the rules were created by the ACMA pursuant to Schedule 8 to the BSA, and extend the application of gambling promotion restrictions during live sporting events to online service content providers. This subjects online content service providers to the same provisions as broadcasters.

• s22(1)(a)(ii)

Under Schedule 8, an **online content service provider** is defined as a service that delivers, or allows end-users to access, content using an internet carriage service; is provided to the public; and, has a geographical link in Australia. A service will have a geographical link to Australia if the service is targeted at individuals who are physically present in Australia; or, any of the content provided on the service is likely to appeal to the Australian public.

5.4 Co-regulation

s22(1)(a)(ii)

Examples of codes and the responsible drafting industry body include:

- **Commercial Radio Code of Practice (2017)** *Commercial Radio Australia* – Clause 4.1 sets out that advertisements must be identifiable as advertising material by reasonable listeners. Part 9 restricts the promotion of gambling and betting odds during live sports coverage; requires identification of

, ss 123, 122, and 125A.

s22(1)(a)(ii)

representatives of gambling organisations; and includes content requirements for gambling advertisements during live sporting events.

s22(1)(a)(ii)

- **Subscription Broadcast Television Codes of Practice (2013)** *Australian Subscription Television and Radio Association* s22(1)(a)(ii)

[Redacted]

Appendix A implements similar watersheds to those in the Commercial Radio Code of Practice and Commercial Television Industry Code of Practice, for betting advertising during live sporting events.

- **Commercial Television Industry Code of Practice (2015)** *Free TV* – Part 5 sets out hourly advertising limits, which vary depending on the time of broadcast. Part 6 specifies restrictions to advertising content, in relation to alcoholic drinks, intimate products and services, films and computer games, and betting and gambling during children's programs. Appendix 3 contains restrictions on promotion of odds and betting commercials during live sporting events.

s22(1)(a)(ii)

National broadcasters – the Australian Broadcasting Service (ABC) and Special Broadcasting Service (SBS) – are further subject to the ABC code of practice and SBS code of practice respectively. The SBS Code of Practice requires advertisements to be distinguishable from SBS content, and specifies that SBS must take into account the restrictions in the Commercial Television Industry Code of Practice and relevant industry standards. With regard to betting advertisements during live sport coverage, the SBS Code states that SBS follows the relevant provisions in the Commercial Television Industry Code of Practice and the Commercial Radio Code of Practice.

s22(1)(a)(ii)

[Redacted]

s22(1)(a)(ii)

The ACMA

s22(1)(a)(ii)

However, the ACMA is responsible for regulating and investigating complaints relevant to the gambling industry, including gambling advertising that appears on online channels. Online live sports or content streaming services are subject to regulatory oversight by the ACMA in relation to restrictions on gambling promotional content, as authorised by the *Online Content Service Provider Rules*.

s22(1)(a)(ii)

ACMA INVESTIGATION: GAMBLING

On 3 July 2019, the ACMA commenced an investigation under the BSA, into Nine Entertainment Co. Pty Limited's (Nine's) compliance with the *Broadcasting Services (Online Rules Content Service Provider Rules) 2018* (Online Rules) during Games 1 and Game 2 of the 2019 State of Origin with respect to the advertising of gambling promotional content.

The ACMA found that Nine's 9Now service was not an exempt simulcast service and advertising during these games satisfied the definition of gambling promotional content for the purposes of clause 2 of Schedule 8 to the BSA. The ACMA further found that Nine breached section 12 of the Online Rules – in that gambling promotional content was provided in conjunction with live coverage of sporting event.

s22(1)(a)(ii)

6 Disparities in the regulation of advertising

s22(1)(a)(ii)

A number of bespoke regulatory solutions have been implemented to address specific online issues. With regard to advertising, the *Broadcasting Services (Online Content Service Provider Rules) 2018* provide the most recent example of a framework that brings the restrictions that apply online in line with the restrictions applicable to broadcasters.

However, the Online Content Service Provider Rules only address the specific issue of gambling advertising during live sporting events, and do not mitigate other disparities between online media and broadcast media.

s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

5. General content of gambling ads

The AANA's Wagering Advertising Code; the Online Content Service Provider Rules; and the commercial television and radio, and subscription television industry codes, impose slightly different obligations in relation to wagering and/or gambling advertisements. The AANA Code's restrictions as to the content of such advertisements go beyond the limits of live sporting events, while the industry codes of practice are limited to those events. That being said, the regulatory and co-regulatory content safeguards applicable to broadcast advertisements during live sporting events are wider than the AANA's content safeguards. The wider obligations on broadcasters means they need to take additional action to ensure AANA-code compliant advertisements also meet industry code requirements.

AANA Wagering Advertising Code

This Code imposes obligations on all advertisers in relation to wagering advertisements, and goes beyond the limits of live sporting events. This includes obligations prohibiting:

- wagering ads from being primarily directed at minors;
- depicting minors or 18-24 year-olds engaging in wagering activities;
- portraying or condoning wagering in combination with alcohol consumption;
- stating or implying a promise of winning;
- associating wagering with sexual success or enhanced attractiveness; or
- portraying or condoning peer pressure.

Commercial television and radio, and subscription television industry codes and online Content Service Provider Rules

These codes impose obligations on broadcasters in relation to the content of gambling advertisements during live sporting events, as well as general content restrictions. The Online Content Service Provider Rules

replicate the obligations applicable under the broadcasting codes. Some obligations are similar to those included in the AANA's Wagering Code, such as not directing such advertisements at children, but they are not identical. The industry codes impose obligations on broadcasters that are wider than those applying to advertisers. This includes, for example, restrictions around:


- scheduling of betting advertisements during live sporting events;
- promotion of betting odds by commentators during live sporting events;
- representatives of gambling organisations not appearing at or around the live sport venue in commercials for betting or gambling;
- inclusion of responsible gambling messages;
- not portraying gambling as a family activity;
- not making exaggerated claims;
- not promoting gambling as a way to success or achievement; and
- requiring that promotion of betting odds or advertisements about betting or gambling be socially responsible and not mislead the audience.

The Commercial TV Code of Practice also restricts the broadcast of betting or gambling advertisements during programs classified G or lower, or during any program principally directed at children during certain hours.



As discussed, AANA Codes impose obligations on advertisers, while industry codes are enforceable against broadcasters. This means broadcasters must take action to ensure advertisements comply with their industry code obligations, and cannot rely on the AANA Code obligations as other non-broadcast service providers can.

s22(1)(a)(ii)

Released under the freedom of information Act 1982 by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts

s22(1)(a)(ii)
Specific Restrictions – gambling and alcohol

There are also specific restrictions on advertising during children's programming under the Commercial TV Code of Practice. This includes a prohibition of betting or gambling advertising in any program classified G or lower broadcast between 6am and 8.30am, or 4pm and 7pm; or during any program principally directed to children broadcast between 5am and 8.30pm.

s22(1)(a)(ii)
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s22(1)(a)(ii)

7.3 Inconsistent consumer protections

Advertising restrictions play an important role in protecting vulnerable audiences, including children, from the influence of advertising on consumer behaviours. Advertising that promotes products or behaviours that contravene public health objectives (alcohol, tobacco and gambling advertising), or undermines community expectations, is subject to obligations that regulate the placement and frequency of such ads.

s22(1)(a)(ii)

8 Key linkages

There are a number of ongoing or anticipated projects across government and industry that relate to advertising issues.

s22(1)(a)(ii)

s22(1)(a)(ii)

s22(1)(a)(ii)

Gambling

The National Consumer Protection Framework for Online Wagering (National Framework) is a set of ten harm minimisation measures to protect Australians against problems associated with online wagering. 7 of the 10 elements have been implemented.

The remaining measures are BetStop (aka the national self-exclusion register), staff training and consistent gambling messaging, which are all expected to be implemented in the next 6-months. Reviews will be undertaken on the National Framework after 6-months, 18-months, and 3-years following its full implementation.

The Government has recently proposed reforms for consistent gambling messaging, including a selection of 7 new taglines. This has been met with significant stakeholder criticism. The Department of Social Services is now undertaking consultation on the proposals.

On 15 September 2022, the House of Representatives Standing Committee on Social Policy and Legal Affairs launched an inquiry into online gambling and its impacts on people with gambling problems. The Committee will consider the effectiveness of current gambling advertising restrictions on limiting children's exposure to gambling products and services (e.g. promotion of betting odds during live sport broadcasts), including consideration of the impact of advertising through social media, and sponsorship or branding from online licenced gambling operators. The department provided a written submission to the inquiry.

s22(1)(a)(ii)

Appendix A – Advertising restrictions across mediums

Advertising Area		Regulation/ Code	Commercial TV	Subscription TV	Commercial Radio	Online	Print	Responsible Agency*/ regulator	Framework	Gap	Potential implications
Gambling	Gambling during children's hours	CTC	✓	✗	✗	N/A	N/A	DITRDC*/ACMA	Co-regulatory	<p>Yes: commercial TV is subject to co-regulation restricting broadcast of gambling ads during programs classified G or lower during children's hours, or during programs directed at children between 5am and 8:30pm. The STC requires subscription TV licensees to consider the intellectual and emotional maturity of the intended audience when scheduling ads relating to betting or gambling, but does not outright restrict them during children's programming. Arguably "children's hours" is irrelevant for both print and online, as both can be viewed at any time. Commercial radio has no obligations regarding gambling advertising during children's hours.</p>	If the obligations in the CTC are considered important safeguards to protect children as vulnerable consumers of commercial TV, the lack of similar obligations across other mediums consumed by children represents a gap in meeting community expectations for the protection of children.
	Gambling during live sporting events	BSA/OCSPP CTC, CRC, STC	✗ ✓	✗ ✓	✗ ✓	✓ ✗	N/A N/A	DITRDC*/FreeTV/ CRA/ASTRA/ACMA	Regulatory Co-regulatory	<p>No: All relevant medium types have co- or regulatory obligations.</p>	
	Content of gambling advertising	CTC, CRC, STC	✓	✓	✓	✗	✗	DITRDC*/FreeTV/ CRA/ASTRA/ACMA	Co-regulatory	<p>Yes: AANA codes impose obligations on advertisers/marketers to ensure compliance, rather than on the broadcaster/publisher. The AANA wagering code applies to all wagering advertising, and is not limited to live sporting events.</p>	If these additional co-regulatory obligations applying to broadcasters are considered important safeguards to protect the community when consuming live sporting events, the lack of similar obligations in other contexts may represent a gap in meeting community expectations for community protection, particularly in the online context
		AANA Wagering Ads Code	✓	✓	✓	✓	✓	DITRDC* / AANA Ad Standards	Self-regulatory	<p>The CTC, CRC, and STC codes include obligations relating to gambling advertising during live sporting events. These include not directing at or depicting minors as participating in gambling; associating gambling with alcohol; or promoting gambling as a way to achieve success. Online and Print broadcasters/publishers are not subject to additional co-regulatory obligations.</p>	

s22(1)(a)(i)

**Department of Infrastructure, Transport,
Regional Development, Communications and the Arts**

Subject: Draft responses to Petition EN3559,
s22(1)(a)(ii)

s22(1)(a)(ii)

Recommendation:

- 1. That you note the information provided in this brief and **sign** the responses to the Committee Chair at **Attachment B, Attachment D, Attachment F, and Attachment H.****

Signed / Not Signed

The Hon Michelle Rowland MP

Date:

Comments:

Key Points:

1. The House of Representatives Standing Committee on Petitions (the Committee) referred four petitions to you under Standing Order 209 (a) and (b). Under Standing Order 209(b) there is an expectation that responses from Ministers will be lodged with the Committee within 90 days of presentation of the petition.
2. All four petitions have passed the 90-day response timeframe, with two being referred prior to the 2022 election. Two were not responded to by the previous Government.

- a. **Petition EN3559 (Attachment A)** was referred on 14 February 2022, with 1700

s22(1)(a)(ii)

s22(1)(a)(ii)

the responses will also be provided to the principal petitioner.

s22(1)(a)(ii)

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Ph: 02 6271 7922

Cleared Date: 11 January 2023

Ph: 02 6271 s22(1)(a)(ii)

Instructions for MPS: Nil**Responsible Adviser:** Isabelle Burns**PDMS Distribution List:** Jim Betts. Richard Windever. Pauline Sullivan. Bridget Gannon. Adam Carlon,
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From: "APHwebadmin (DPS)" <APHwebadminDPS@aph.gov.au>
Sent: 14/02/2022 4:40:09 PM
To: "DLO" <DLO@communications.gov.au>
Subject: CM: Petition Ministerial Referral (EN3559)



14/02/2022

Hon Paul Fletcher MP
 Minister for Communications, Urban Infrastructure, Cities and the Arts
 Parliament House
 Canberra ACT 2600

Dear Minister,

A petition on the following terms was recently presented in the House.

Presentation date: 14/02/2022
Petition number: EN3559 (*Please quote in future correspondence*)
Number of signatures: 1700

Terms:

Reason: Australia has the highest gambling losses per adult in the world, we are gambling nation. The Australian media has done a lot to promote this social behavior and needs to be held to account. Gambling advertising has become a growing problem in Australian media, it is inescapable for sports fans, free to air/foxtel viewers and now there is a growth market of gambling advertising in esports which has predominately pre teen and teenage audience. In 2017-18 Australians spent 242 Billion on gambling with a loss of around 25 billion, the losses accumulated averages out to be \$1260 per year per person and remember, that's if EVERYONE gambled. Since 2017-18 we have seen a change in the way people gamble, betting apps have brought the TAB to your pocket and with a constant reminder to BET BET BET those losses are sure to continue rising. Why is this an issue? There are direct connections between gambling harm and family violence and mental ill-health. Gambling harm encompasses everything from the loss of homes and relationships to the loss of lives through deaths by suicide. Gambling isn't going away, the Australian media needs to be responsible for not

promoting or normalising actions that are demonstrably harmful to Australian citizens and those around them. We did it for ciggies, now it is time for gambling.

Request: We therefore ask the House to ban Gambling advertising in all Australian media.

As you may be aware, under Standing Order 209(a) and (b) the Petitions Committee may refer a copy of a petition to the Minister responsible for the administration of the matter raised in the petition. Written responses to the referred petition are expected within 90 days of presentation to the House.

When the response has been considered by the Committee it will be presented in the House, recorded in Hansard and posted on the Committee's website at:

<http://www.aph.gov.au/petitions>.

I look forward to receiving your response in due course.

Please email your response to the Petitions Committee at
petitions.committee.reps@aph.gov.au



Chair



STANDING COMMITTEE ON PETITIONS

PO Box 6021, Parliament House, Canberra ACT 2600 | Phone: (02) 6277 2152 | Email:
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**The Hon Michelle Rowland MP****Minister for Communications
Federal Member for Greenway**

MS23-000022

Ms Susan Templeman MP
Chair
House of Representatives Standing Committee on Petitions
PO Box 6022
Parliament House
Canberra ACT 2600

via: petitions.committee.reps@aph.gov.au

Dear Chair

I refer to the email of 14 February 2022 from the former Chair of the House of Representatives Standing Committee on Petitions, Mr Ken O'Dowd MP, to the former Minister for Communications, the Hon Paul Fletcher MP, regarding Petition EN3559. I am responding to this petition as the current Minister for Communications in this term of Government. I apologise for the delay in responding.

The signatories of this petition have expressed concern regarding the levels of gambling losses and harm experienced by Australians and are calling for the House of Representatives to ban gambling advertising on all Australian media.

The Government recognises the importance of gambling promotions being presented in a responsible manner. Advertising regulation in Australia is intended to strike a balance between legitimate commercial interests and appropriate community safeguards.

The Government is committed to guaranteeing online gambling takes place under a robust legislative framework with strong consumer protections, including through the continued implementation of the National Consumer Protection Framework for Online Wagering.

A key part of the Framework is consistent gambling messaging, which requires gambling providers to use the same messaging about the risks and potential harm of gambling in all advertisements. These new taglines will be implemented across all platforms by 30 March 2023. Further information on the new gambling messages can be found at dss.gov.au/communities-and-vulnerable-people-programs-services-gambling/information-for-online-wagering-providers.

Another part of the Framework is BetStop, a national self-exclusion register for online wagering, which is expected to launch in early 2023. If an individual self-excludes using the

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register, wagering providers will be required to close all betting accounts and must not let the individual place a bet, open a new account, or send them marketing messages. More information on BetStop can be found at acma.gov.au/betstop-national-self-exclusion-register.

On 15 September 2022, the House of Representatives Standing Committee on Social Policy and Legal Affairs launched an inquiry into online gambling and its impacts on those experiencing gambling harm. The inquiry will include examining the effectiveness of current gambling advertising restrictions on limiting children's exposure to gambling products and services, including consideration of the impact of advertising through social media, sponsorship or branding from online licensed gambling operators. The Committee sought submissions from the public by 11 November 2022. The Government will consider the Committee's recommendations when it releases its final report. More information about the inquiry can be found at aph.gov.au/Parliamentary_Business/Committees/House/Social_Policy_and_Legal_Affairs/Onlinegamblingimpacts.

I have enclosed some additional information regarding the current gambling advertising restrictions.

Thank you for bringing this petition to my attention. I trust the information will be of assistance to you.

Yours sincerely



Michelle Rowland MP

13 / 2 / 2023

Enc. Current gambling advertising restrictions

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Current gambling advertising restrictions

Most content broadcast in Australia is regulated by co-regulatory codes of practice developed by broadcasting industry sectors in accordance with the *Broadcasting Services Act 1992*.

There are rules that relate to the content and scheduling of advertisements, including gambling advertisements. Generally, the codes prohibit gambling advertising during programs that are principally directed to children.

The Commercial TV Code also prohibits gambling advertisements:

- during General (G), Preschool (P) or Children's (C) rated programs broadcast between:
 - 6.00 am and 8.30 am, 4.00 pm and 7.00 pm; and
- during any program that is broadcast between 5.00 am and 8.30 pm and which is principally directed to children.

These prohibitions do not apply during news, current affairs or sports programs broadcast in those time periods.

Further limits apply to gambling advertisements and the promotion of odds shown during live sporting events broadcast on commercial television, commercial radio, subscription television and the Special Broadcasting Service (SBS). For example, no gambling advertising or promotion of odds is allowed during play and no promotion of odds is allowed during breaks in play (such as half time). More information about these restrictions is available on the Australian Communications and Media Authority (ACMA) website at acma.gov.au/gambling-ads-during-live-sports-broadcasts.

The codes of practice also include procedures for dealing with complaints. In the first instance, a complaint must be submitted to the relevant broadcaster. A complaint may be referred to ACMA if a broadcaster does not provide a response within 60 days or if the response provided is considered to be inadequate. Copies of the codes of practice are available on ACMA's website at acma.gov.au/industry-codes-practice.

Broadcasting co-regulatory codes of practice are periodically reviewed. Members of the public may contact the relevant peak industry body to raise their concerns, and to enquire about how they can contribute to future review processes.

Additionally, the *Broadcasting Services (Online Content Service Provider Rules) 2018* (Online Rules) restricts the showing of gambling promotions during online streams of live sporting events. These contain gambling promotion restrictions that are, to the extent possible, similar to those that the broadcasting industry codes impose on the broadcast of live sporting events. More information about the Online Rules is available on ACMA's website at acma.gov.au/gambling-ads-during-sport-streamed-over-internet.