



January 10, 2023

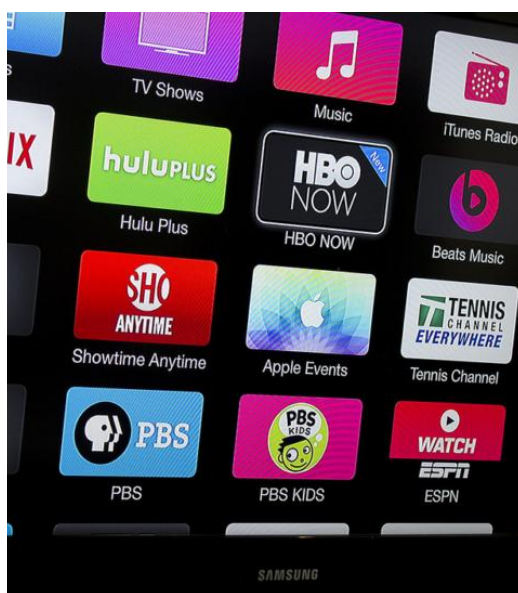
The Hon. Michelle Rowland MP  
Minister for Communications  
Canberra, Australia ACT 2600

Dear Minister

## Submission - Prominence Framework

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.



## CTVMA Industry Leaders

The CTVMA includes members spanning the world's leading electronic brands, broadcasters, streaming networks, studios, producers, advertising agencies, tech firms, media buyers, publishers, games and music industries.

## Submission Prominence

In response to your consultation, our organisation conducts research as well as advocacy in this sector. Specifically as it relates to the ACCC Digital Platform Services Inquiry 2020-2025 submission, and the industry rules and regulations overseen by ACMA, specifically as follows:

- During COVID-19, our sector experienced more than five years of growth in less than eighteen months. It is now the most preferred digital platform in Australia. 82 per cent of all apps on CTV platforms are broadcast, media or entertainment apps. However, the number of health, education and video commerce apps also increased during the pandemic.
- Digital trade in the connected home is forecast to reach \$72 billion in 138 of the world's leading economies by 2023, including third-party app stores. We therefore strongly support and encourage the Government's inquiry to consider in its final report findings the importance to develop an open regulatory framework to support Australian developers on connected TV platforms, including startup incentives.
- As you know, data flows are an intrinsic part of trade-related aspects of electronic commerce in app stores. Moreover, with the advent of 5G applications in the home, CTV platforms will offer Australian startup businesses a number of unique digital trade opportunities for Australia's digital export future, including virtual goods and services on OS devices.
- CTV platforms and OS device policy guidelines ensure app developers and publishers receive fair and reasonable commercial access when positioning their app (s) in their app stores for commercial approval and visibility.

## Submission Prominence

- CTV platforms and OS devices provide a vital marketplace to Australian consumers for global streaming video entertainment, advertising and future digital trade. Including share of revenue earned by OTT apps in their marketplaces in exchange for visibility and commerce. In an internet-only world, more than 45% of content is streamed without spectrum, and 75% of streaming audiences make their viewing choices on CTV platforms.
- Mandatory prominence of public service media requirements would raise platform costs and increase prices to Australian consumers, and stifle innovation of future digital trade in the home. Moreover, redundancy of FTA spectrum licensing fees in favour of streaming usage and non anti-siphoning rules will support a free ad-supported streaming future.

The CTVMA supports the discoverability of OTT apps in app stores on fair commercial terms without competitive advantage would be best served under a wider industry Streaming Code of Practice framework with the Future of Broadcasting Working Group.

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