

**UK Film Council  
Response to**

**An Invitation to Comment on Project Canvas  
from the Office of Fair Trading**

**April 2010**

1. The UK Film Council is the Government-backed lead agency for film in the UK ensuring that the economic, cultural and educational aspects of film are effectively represented at home and abroad. The Board of Directors, appointed by the Secretary of State for Culture, Media and Sport, oversees the work of the UK Film Council and provides advice to the Government on film.

2. We welcome the opportunity to make a short response to the Invitation to Comment on Project Canvas from the Office of Fair Trading.

3. The UK Film Council strongly welcomes the proposal by the shareholders in Project Canvas to create and deliver the platform. We believe that Project Canvas will have a positive impact on competition and innovation resulting in clear benefits for consumers for reasons including the following:

- i. We believe that Project Canvas as a service neutral platform will help to deliver outcomes – e.g. broadening of access to public service content including film, digital inclusion and participation among vulnerable and disadvantaged groups - which are unlikely to be delivered by the market alone.
- ii. By delivering a rich mix of video content and associated applications and services to the living room, Canvas will help to encourage the creation of new legal services of all kinds offering audiences and users the opportunities to engage with on-demand content in ways. In particular, it will help consumers to find, discover and access British films and specialized films (e.g. archive material). This should help to drive take-up of broadband, build Digital Britain and, from our particular perspective help to broaden access to film in the UK in all its richness and diversity.
- iii. In the same way, Canvas will help to stem online copyright theft and infringement which is currently widespread in relation to digital content, including films and other audiovisual material. It will do this by providing a platform for the development of new legal services and this will help to promote investment. This will help to strength competition in legal markets with resulting benefits for consumers.
- iv. In particular we note that BBC Executive has stated that Canvas will be open to free, advertising-funded and paid-for content (via a range of payment models). This will believe will help stimulate competition and innovation in delivering film and the moving images by digital means.
- v. We welcome the proposed focus of the shareholders on “open standards” as this will help facilitate access to the widest possible range of content and services, thereby promoting competition.

- vi. We also support the BBC Trust's view welcoming the proposed "objective measures to prevent undue prominence of major existing services" with regard to the navigation system for Canvas. This will also help to ensure that competition is maximized.

Ends.