

**SUBMISSION
TO
AUDIOVISUAL SERVICES DIRECTIVE CONSULTATION**

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MADIGAN CLUFF

EVALUATING BRAND PRESENCE

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INTRODUCTION

This submission is provided by Madigan Cluff, with support from Essential Television Statistics Ltd, in response to the Audiovisual Services Directive Consultation on proposals for product placement in television programming in the United Kingdom.

Madigan Cluff specialises in evaluating brand presence and was created in direct response to the dramatic shifts in the media marketplace in recent years. Founded on knowledge and expertise built up over many years at the head of Media Audits (Michael Cluff), and the sophisticated databases owned by Essential Television Statistics Ltd. (Paul Madigan), the company offers a unique quantitative and qualitative perspective relating to the presence of brands within programmes.

Madigan Cluff provides robust analysis of the media value of sponsorship and branded placement activities, and of the additional volume generated when the programmes involved are shown in overseas markets. The information it creates is of interest to both brand-owners/advertisers and to production companies and broadcasters.

CONTEXT

Helping UK programme production to continue as a worldwide success

The UK has a long-established record as a successful exporter of programmes and films to the rest of the world. As well as generating valuable foreign revenue for a highly-regarded British film and TV industry, these provide a high-profile platform for promoting 'Brand GB' in a global market place.

In sport – where the UK has for many years accepted and optimised sponsorship, on-screen brand imagery and other forms of commercialisation – we have generated major income for the country through the success of Formula One car racing, Premier League football and international cricket, among others.

Direct paid-for product placement is also legally accepted within British-made feature films, offering opportunities for a non-refund funding source to producers and international brand visibility.

British TV productions competing on an uneven playing field

In television production, however, British TV stations and programme makers are disadvantaged by current legislation on product placements.

UK television-produced drama and series compete for air time in many countries with US productions. US producers increasingly employ the placement of commercial brands within programmes – indeed the average major US film release now contains 24 brands (although these may not always be overtly recognisable). Whereas, at present, the placement business in the UK is driven underground by the need to supply goods for free.

This situation creates a very uneven playing field for financing programmes between the UK and other countries – particularly the US:

- Inside the UK, imported programming and sports programmes carry commercial messages, while UK brands can only access the same potential audience through free ‘prop’ placement (which, while offering exposure benefits for the brand-owners, means that programme makers are missing out on potential funding).
- Outside the UK, US material has a significant cost advantage, because it is part funded by the brand placements which it features.

This acts to the disadvantage of both the programme producers, who need to fund production, and of UK brands, which find it more difficult to gain visibility to both UK and international audiences.

The inequity relating to product placement for UK producers/broadcasters is set to worsen because of changes in the wider European market. Even now the interpretation of the ban on product placement under the Television Without Frontiers Directive differs across the EU.

A position whereby the UK continued to ban product placement while most, or all, other EU countries allowed it, would exacerbate this inequity, further disadvantaging the competitiveness of UK producers/broadcasters, especially given EU rules about country of origin regulation and freedom of cross-border broadcasts. In this context, continued exclusion of product placements for UK-originated programmes in isolation from its EU competitors would be untenable.

A changing broadcast market – proliferation of choice

The world of broadcasting that exists today is very different from the era when the product placement rules were first brought in. From a time when viewers had a choice of no more than three/four/five channels, there is now a proliferation of channels as well as on-demand online options operating in a free and very competitive market for TV broadcasting.

This expansion of choice means that consumers can much more easily ‘vote with their feet’ against programmes they don’t like – a freedom of choice that would apply equally in allowing viewers to switch to alternative channels if they didn’t like a programme because the product placement was too overt or inappropriate. And, on the basis of free market principles, the programme simply wouldn’t last.

Countering consumer concerns and negative perceptions

Although there are a number of negative perceptions about product placement, these are easily countered and there is no evidence that allowing product placement within UK-made programming would impact negatively on viewers' experience of television viewing or on their rights as consumers, especially if placements are covered by a clear and consistent code of conduct defining acceptable and appropriate parameters, a system of independent monitoring and a channel for viewer complaints to be made and responded to in case of any abuses.

- **Viewer experience** – UK audiences are already exposed to commercial brands within television programmes for about a quarter of their viewing (sports, feature films, imported programming). This is not a major source of complaint from the public.
- **Integration of placements** – There are concerns that placements would detract from the integral values of the programme or narrative. However, good programme placement is about placing brands in the best context of a relevant story, with a good fit between the products and the material, matching and reinforcing the attributes of both (eg through the brand of car a character drives or the soft drink he/she chooses). Obtrusive or inappropriate product placement only attracts ridicule and cynicism.
- **Monitoring and regulation** – A code of standards would ensure there was a properly contracted and paid-for process for both product and prop placements, which could be monitored and controlled in the same way that advertising is currently. This would provide clarity and consistency, defining the acceptable and appropriate parameters of placement, as well as providing a robust and transparent basis for action to be taken in any cases of abuse.

The need for a new approach to effective brand promotion and programme funding

With traditional methods of broadcast advertising becoming less attractive to brand-owners for promoting their products – and, as a result the likelihood of shortfalls in funding for advertising-supported TV stations – there is an urgent need for alternative media to be developed and maximised.

Without access to alternative sources of funding, financial pressures will restrict the output of UK broadcasters and programme producers/commissioners, both in terms of the quantity and quality of programmes they are able to produce/commission.

As has already been widely recognised in the US and other parts of the world, paid-for product placement offers a number of clear advantages in this regard:

- Providing broadcasters, producers and commissioners with alternative sources of funding for creating high-quality films and programmes.

- Providing brand-owners and advertisers with a medium for reaching their target audiences effectively.

As a result, sponsorship and branded placement have become increasingly important as vehicles for promoting and positioning brands effectively and empathetically.

EXECUTIVE SUMMARY OF RESPONSE TO THE AUDIOVISUAL SERVICES DIRECTIVE CONSULTATION

The following key points summarise our response to the issues in the Audiovisual Services Directive Consultation on proposals for the implementation of product placement in the United Kingdom. They are based on the unique overview and understanding Madigan Cluff has of the sector both in the UK and internationally – detailed evidence to support these arguments is provided in the following section.

Itemised responses to the consultation questions can be found in **Appendix 1**.

Summary of key points:

- **Inconsistencies in current product/prop placements on UK TV**
 - **Uneven playing field for US/UK productions** – At present, there is a very uneven playing field relating to placements in programmes broadcast on television in the UK, whereby many imported US programmes carry high levels of product placement (which in the main cannot be removed from the UK-broadcast versions), while product placement is banned from UK-originated productions.

This means that British programme makers are at a financial disadvantage in not being able to fund productions with placement-derived financing – with therefore much greater difficulty in putting together the funding they need, especially at a time when funding from more traditional sources is under increasing pressure.

- **‘Underground’ prop placements** – Some forms of product/prop placement are inevitable and are indeed an integral part of some programmes (for instance brand-identifiable cars in drama). Therefore, it is not possible for there to be a complete ban on placements.

A ban on broadcasters deriving income from product placement drives the exchange value ‘underground’, whereby a branded product might be placed in a film/programme as a ‘prop’ (eg a car), but without the film maker deriving the potential income that might otherwise have been earned from it.

It is currently difficult to define the differences between prop and product placements. The industry would be better served by a clear code of standards defining prop/product placements, appropriate and acceptable payment processes relating to these, and clear and consistent parameters defining acceptability and inappropriateness.

- **Viewer responses to product placement**

UK television viewers are already exposed to substantial product placement in feature films and imported programmes in genres such as dramas and series, as well as sports programmes.

There are currently very few viewer complaints about product placements in these programmes – and no reason to suggest this would be different for British-produced programming.

The majority of viewers now have access to a very wide choice of stations and would without doubt exercise that choice by turning to another channel if they felt there was excessive or inappropriate commercialisation of programmes. If viewers consider that product placement is too overt or distracting in a programme, they will simply switch to another channel and the programme won't last.

- **Potential financial benefits – and other benefits**

- **For advertisers/brand-owners** – There is considerable potential for income through brand exposure in programmes that will appeal to brand-owners' target demographic groups – possibly up to 10% of advertising revenue (a higher proportion of advertising revenue than in the US, because in the US all stations carry advertising (and placement), whereas in the UK only non-BBC programmes carry advertising).

This is particularly important at a time when revenues are declining from traditional advertising, due in particular to the proliferation of new TV channels and on-demand internet media, which dilute advertisers' target audiences, reducing audience ratings and the return-on-investment for advertisement spots.

The most valuable placements are derived from a close fit between the product and the context of the programme in which it appears, re-enforcing the positive image of the brand, without compromising the narrative/aesthetic values of the programme.

- **For programme makers/broadcasters** – Product placement has the potential to be a significant source of income to broadcasters and programme makers/commissioners, giving them access to higher programming budgets.

Indeed, it is potentially worth up to 10% of advertising revenue – which is particularly significant given the expected shortfalls in advertising funding for stations in the next decade.

This would enable more and/or higher-cost British programmes to be made, especially as product placement funding offers producers a source of non-refund revenue.

- **Potential overseas impact** – A significant proportion of UK films and drama series are exported overseas, with established and highly receptive markets worldwide.

This is a premium for brand-owners and advertisers, as, once a product is included in a programme, brand exposure will be created wherever the programme is exported. The total value of a placement is therefore not only its UK transmission value, but its worldwide value.

The additional funding derived from placements would also increase the scope for overseas exports for British programme makers and broadcasters, thereby increasing the opportunity to showcase high quality programmes, enhancing by association the standing of British television.

Broader economic benefits would be derived from increasing employment in the film/television industry and expanding the promotion of British-brand products to overseas markets.

DETAILED EVIDENCE

Through its access to unique ETS revenue-analysis data, Madigan Cluff has developed analytic methodologies to evaluate the overall financial value of TV programmes, based on the revenue generated from traditional advertising activity (ie from revenue from the sale of advertising spots shown through and between the programme).

This data has been used to estimate potential revenues through placements, as detailed below.

The potential value of product placements – the US model

The value of product placement in US programming is estimated in 2008 to be worth \$9.5 billion per annum* (growing at up to 10% per annum).

To set a context for this, the total US television advertising expenditure is \$71 billion per annum – ie the value of placement-generated revenue can be estimated at somewhere between 13% and 14% of TV revenue.

The potential value of placements for UK-produced programming

In the UK, a number of factors impact on the potential value of product placement and cause it to differ from the US model, including:

- The film and television industry is proportionately smaller in the UK, and overall exports of programming are proportionately smaller.
- The level of placement acceptable in UK television may be lower than currently accepted in US television.
- UK television advertising revenue is deflated relative to the US by the fact that only about 68% of TV audience delivery in the UK is on stations that carry commercial advertising, while forms of product/prop placement will (and already do) appear on the BBC (eg in dramas). This suggests that the percentage of revenue from placements may be higher than in the US, where 99% of TV audience delivery is on commercial stations.

We believe this suggests that the ultimate value of the UK placement industry could generate revenues worth 7-10% of total UK TV advertising revenue – equating to between £250 and £330 million annually.

The net addition of further revenue to UK-produced programmes would flow through to greater production budgets, which would lead to higher employment across the sector.

Viewer responses to product placements in programmes currently broadcast in the UK

* Source: Jack Myers Business Report, © 2008. Myers Publishing, LLC

Over 25% of television viewing in the UK is already of programmes that legally contain some form of product/prop placement in a range of different programmes (both imported and home-produced).

UK television has a significant volume of imported programmes, primarily in the genres of drama, film and sitcoms and particularly of US origin, which are part-funded through product placement and contain significant levels of product placement.

Other imported genre programmes also feature types of direct or indirect product/prop placement, as do British-produced programmes, such as dramas and series (eg clearly branded cars driven by characters, etc)

In addition most sports programmes contain significant levels of overt product placement and advertisement (see section on sports below).

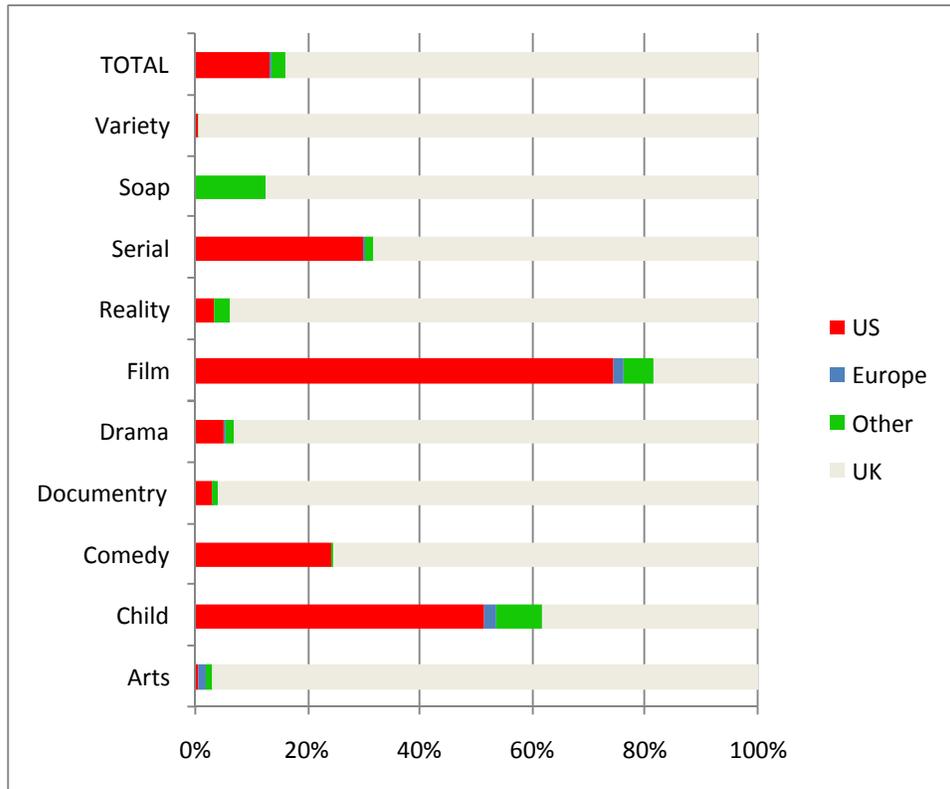
Even advertising within a programme is now permitted, provided it is separated visually, although to date this has not been exploited by UK broadcast companies.

Viewers accept these placements without major complaint.

The table below (**figure 1**) illustrates the percentage of UK viewing on major stations (based on the country of origin of the programmes).

In addition to these programmes, other programmes are produced using co-production agreements between a UK company and an overseas production partner. Co-production programmes made up an additional 6.8% of the total viewing.

Figure 1: SHARE OF AUDIENCE DELIVERY BASED ON COUNTRY OF PRODUCTION
 (BBC1 & 2, ITV, Channel 4, Channel 5, Sky One)



Source: BARB / ETS / EMS: Total audience delivery by genre/ source of production July 2007 – June 2008

Impact on overseas exports of British television drama

The UK is a major exporter of television drama to the rest of the world. The table below (**figure 2**) shows the countries where a sample selection of major UK dramas have been broadcast. This shows that there is a major market for UK programming which both supports continuing production of quality drama in the UK, and provides a window on UK life to the world.

Figure 2: COUNTRIES THAT BROADCAST MAJOR UK DRAMAS (selected sample)

Title	AUSTRALIA	AUSTRIA	BELGIUM	CZECH REPUBLIC	DENMARK	FINLAND	FRANCE	GERMANY	GREECE	HONG KONG	HUNGARY	ITALY	JAPAN	NETHERLANDS	NEW ZEALAND	NORWAY	POLAND	PORTUGAL	REPUBLIC OF IRELAND	SOUTH AFRICA	SPAIN	SWEDEN	SWITZERLAND
BAD GIRLS																							
DOC MARTIN																							
DOCTOR WHO																							
EASTENDERS																							
EMMERDALE																							
FLOOD																							
FOOTBALLERS' WIVES																							
HOLLYOAKS																							
HUSTLE																							
INSPECTOR LYNLEY MYSTERIES																							
INSPECTOR MORSE																							
LEWIS																							
LIFE ON MARS																							
MIDSOMER MURDERS																							
NEW TRICKS																							
PRIMEVAL																							
SHAMELESS																							
SILENT WITNESS																							
SKINS																							
SPOOKS																							
STATE OF PLAY																							
STATE WITHIN, THE																							
TEACHERS																							
THIEF TAKERS																							
TOUCH OF FROST, A																							
WAKING THE DEAD																							
WIRE IN THE BLOOD																							

Source: ETS/Madigan Cluff transmissions between 1994 and 2008

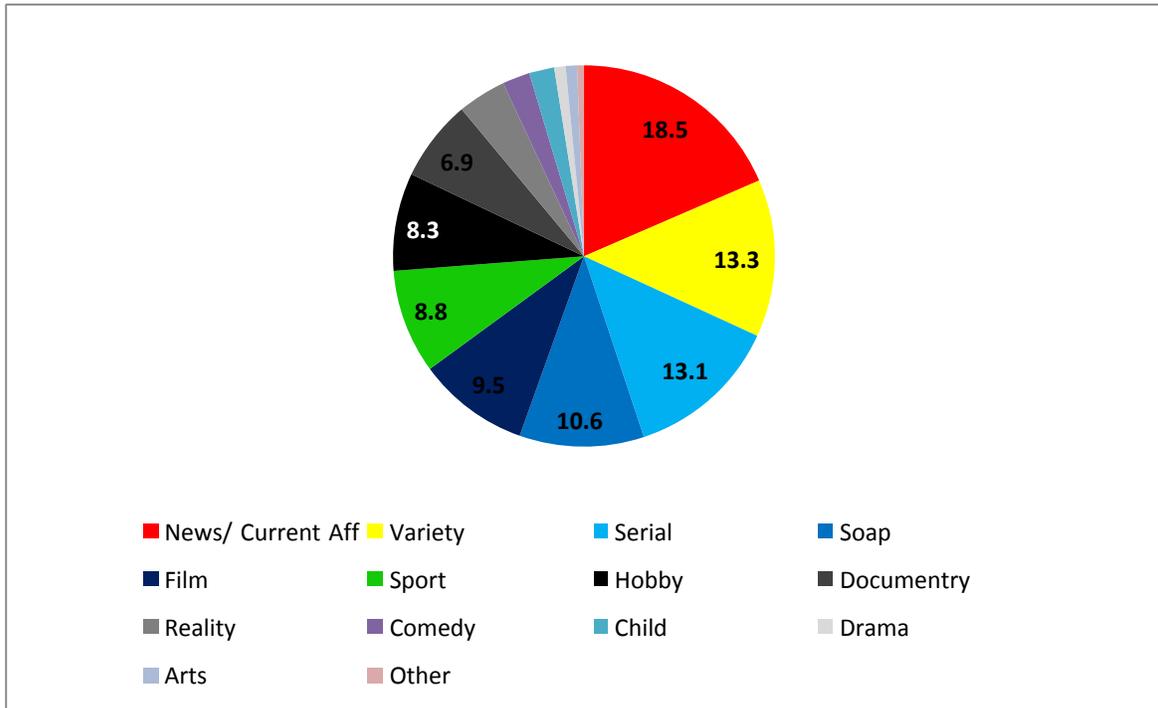
Commercial sponsorship and product placement in sports programming

The UK is a world leader in exporting sports programming to the world and has for many years accepted and optimised sponsorship as a vital source of funding and valuable advertising medium through on-screen brand imagery and other forms of commercialisation in sports such as Formula One car racing, Premier League football and international cricket, which are exported worldwide.

This has generated substantial benefits for the UK economy, because sports programmes are allowed to carry commercial messages within the programme output. These commercial messages are directly paid for, and the majority of these placements and sports sponsorships are substantially valued due to their visibility on television. The appearance of commercial messages within these programmes has neither reduced their audience ratings nor caused significant complaint.

As demonstrated in the table below (**figure 3**), sport in the UK, and indeed in most countries worldwide, has a much smaller share of accumulated television audience than film, drama and series which are the subject of this consultation.

Figure 3: PERCENTAGE OF UK AUDIENCE VIEWING BY PROGRAMME GENRE
 (BBC1 & 2, ITV, Channel 4, Channel 5, Sky One)



Source: BARB / EMS: Total Audience delivery by genre/ source of production: Adults 16+: July 2007 – June 2008

The successful model of product placement in sport programming highlights:

- The established – and accepted – precedent of placement in UK television viewing
- The significant potential for growth through extending placements to other genres

CONCLUSIONS AND SUMMARY OF RECOMMENDATIONS

The current restrictions on product/prop placement in UK television act against the interests of the UK entertainment industry competing within a highly competitive international market.

The UK accepts the presence of commercial placements in sport and in imported programmes (with certain restrictions), but restricts their appearance in UK-manufactured programmes and prevents reasonable payments being made to programme producers for product/prop placements.

This means that:

- UK viewers are exposed to placements in overseas-made programmes which will tend to contain non-UK originated goods – but UK-originated goods cannot compete in placements within home-produced programmes.
- In international programme export markets, UK programming competes with programming that receives funding from product placements. This source of revenue is banned for UK productions, making it significantly harder for UK investors and creatives to get a return on their investment.

Summary of recommendations

We therefore believe:

- Product placement should be allowed in UK programming.
- There should be a code of standards which controls product placement within certain types of programmes and ensures that it is appropriate within the narrative and aesthetic context of the programme and does not compromise its creative integrity.
- There should be an exchange of contracts between the advertiser and the production company, visible to the broadcaster on the terms by which programme placement was accepted. It should be clear in the end credits which products were placed.
- There is no reason why some form of the current complaints procedures on advertising or programme content could not be adapted to provide consumers with a transparent, independent and easy-to-use channel for complaining about undue visibility or inappropriateness of products within programmes

APPENDIX 1: RESPONSES TO AUDIOVISUAL SERVICE DIRECTIVE CONSULTATION QUESTIONS

What advantage would there be in permitting product placement in any or all of the specified genres? If so, which genre(s), when and why?

- **Advantages**

For UK television channels and programme makers, product placement has the potential to provide a valuable additional source of programme funding. It has an additional advantage over many other forms of financing as it is provided on a non-refund basis.

Brand visibility already occurs as an integral element of many programmes as free product placement (eg brand-recognisable cars or food/drink products used in the programme). While this exposure is beneficial to brand-owners, programme makers cannot benefit financially from these placements and a more formal system of placements would therefore be more advantageous for them.

Product placement is particularly attractive to television channels at a time when traditional advertising funding (ie for advertising spots during and between programmes) has fallen.

It will also create a more level playing field for UK programme makers in the international market place, as they are currently excluded from accessing funding from placements and are therefore disadvantaged compared with American competitors who benefit considerably from such placements.

For brand-owners and advertisers, it offers additional exposure in both domestic and export markets, especially as being integrated within the programme it will enable them to reach their target audiences regardless of which viewing method they choose to access the programme (TV, online, DVD or other).

Increasing income for UK programme production will help increase both the quantity and quality of UK programmes made, thereby supporting employment in the industry.

British-made programmes of all genres often use British locations, and product placement can be used to enhance positive exposure of 'Brand GB', generating wider benefits to the UK economy.

It can also create additional commercial exposure to UK products in export markets.

- **Genres**

Feature films and imported drama programmes and series containing product placements are already legally aired on UK TV (as well as sports programmes, which have high levels of product placement and sponsorship). In addition, free prop placements of recognisable brands frequently appear in British-made television films, one-off dramas, drama series and light entertainment/factual programmes, including reality TV. It is therefore logical for permission to be extended to allow product placements in all of these genres.

Should programme placement be prohibited by law? Please explain the reasoning behind your preference?

No. For the reasons outlined in the previous answer, banning placements would restrict funding sources for British television channels and programme makers, putting them at a disadvantage in the international market place, particularly versus their US counterparts.

A ban of this sort also disadvantages British brands, restricting their international exposure and export potential.

At a time when traditional sources of financing for programme making are declining, a ban would act as an inhibitor of job creation in the sector.

Should any such legal prohibition allow Ofcom and the co-regulator of video-on-demand services to permit product placement in some or all of the programme genres specified by the AMVS Directive (feature films, television films and series, sports and light entertainment programmes)?

Many UK programmes already accept substantial commercial placements and/or sponsorship – eg most sport programmes shown on television (on both commercial and non-commercial channels) contain very substantial proportions of commercial messages from sponsors (which are accepted as a matter of course by viewers).

There should be no reason why the programme genres in the question should not feature product and prop placement. Outside of these genres, there are examples of product and prop placement for instance in some types of factual programming (eg BBC's *The Apprentice*, which is categorised as documentary/factual/entertainment and contains placements).

If product placement were permitted, how would the audiences and regulators be assured that the editorial integrity had been preserved, as required by the Directive?

It should be regulated and monitored against a code of standards and subject to a viewer complaints procedure, the same as (or similar to) the way advertising is at present.

How could ‘undue prominence’ be avoided, given the commercial imperatives for audiences to recognise the products placed?

‘Undue prominence’ is unlikely to be an issue as product placement works best when the product is naturalistically integrated within the material. To be effective, placement must be of a product that fits the storyline and is consistent with the characterisation and narrative context, so that it feels natural to the viewer.

This contextualised and associative form of brand exposure is one of the fundamental differences between product placement and more overt advertising. It is also what makes it attractive to advertisers and brand-owners.

A product placement that was too intrusive or inappropriate would be counterproductive as it would be a distraction from the content of the programme, reducing viewers’ enjoyment and therefore negatively impacting on audience ratings. The annoyance factor would also lead to ridicule and cynicism about the product.

A code of standards would define parameters of acceptability – both in terms of categories of acceptable products and of acceptable/undue prominence. In regulated categories (such as alcohol, automotive), this should also ensure that all placements meet advertising control restrictions with special attention being paid to children’s programming, and programmes with a high content of children in their audience.

The basis of the code of standards should be to ensure that placements cannot be used to send messages to consumers which advertising codes already aim to prevent, and should be developed further to reflect any genuine complaints consumers have at the time of programme presentation.

Should the same rules apply to both television and on-demand audiovisual media services? If not, how should they differ and why?

Given that much programming will be available on both television and on-demand media – and given that into the future it will probably be difficult to define the differences between the two categories – the easiest solution would be for the same rules to apply to both categories of programming.

However, a two-tier approach could be envisaged with a higher level of placement permissible for online/on-demand media because of their need to generate additional funding in order to be financially self-sustaining. In which case, it would necessary for a certain proportion of the products to be digitally manipulatable so that the brand name would not be recognisable for free-to-air delivery.

Should prop placement continue to be permitted?

Given the difficulty in distinguishing between prop and product placement, prop placement should be considered and treated as part of product placement, subject to the same code of standards and regulation to protect against abuse or inappropriateness.

Should there be a specific set value above which the prop placement is subject to the Directive's rules on product placement? If so, what should it be?

Value is a very difficult criterion. There is no clear definition of value in the industry – amount paid by advertiser, advertising equivalent on screen value, etc. Equally, there would need to be a definition of whether value is judged within an individual programme or across a total series.

Given the difficulties of definition overall, we believe that any regulation should be universal.

What other ways are there of ensuring that the UK meets the Directive's requirement that prop placement above a 'significant' value must be treated as product placement? Which test is best and why?

See the response to the previous question.

If there is a set value for this purpose, should it be set by Government in legislation, or by Ofcom (for television broadcasting) and the video-on-demand co-regulator?

It should be set by Ofcom.

Should product placement continue to be permitted in programmes acquired from outside the UK and in films made for cinema? If not, why not and how could such a ban be made effective in practice?

It would be completely impracticable to ban placements in films or programmes where they have been legally incorporated. Most placements are so integrated within the material that it would not be possible to remove the shots of them from versions of the programme shown in the UK without irremediably distorting the content.

However, broadcasters should be required to take into account viewers' complaints for imported programmes in the same way that they have to for UK-originated programming. If required, they must digitally change imported programming or not broadcast affected programmes.

How should product placement be signalled to viewers?

For the sake of transparency, placements should be listed in the end credits of programmes but should not be intrusive to the programme productions this will draw attention/ act publicity for the placement.

Should the rules on signalling be set by the Government in legislation or by Ofcom (for television broadcasting) and the video-on-demand co-regulator?

Ofcom should be the sole regulator.

APPENDIX 2: PROFILE OF MADIGAN CLUFF

A partnership formed by **Paul Madigan** and **Michael Cluff**, Madigan Cluff specialises in evaluating brand presence and was created in direct response to the dramatic shifts in the media marketplace in recent years. Founded on knowledge and expertise built up over many years at the head of Media Audits (Michael Cluff), and the sophisticated databases owned by Essential Television Statistics Ltd. (Paul Madigan), the company offers a unique quantitative and qualitative perspective relating to the presence of brands within programmes

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Paul Madigan, Founder and Managing Director of Essential Television Statistics

Founded in 1993, Essential Television Statistics (ETS) monitors television schedules around the world to provide imported title airings data to international film and television clients, including major American studios, film and music guilds, and the European Commission. In 1998, he created Essential Media Services Ltd to enable clients to analyse online audience rating data across Europe, Latin America and the Pacific Orient.

Prior to creating ETS, Paul spent 20 years in the film and television industry, with extensive experience of working on feature films, documentaries, advertising and television series in a variety of roles including as a distributor and as an independent producer.

Michael Cluff, Former Board Director of Media Audits

Michael Cluff was for 28 years at the head of Media Audits, which developed the concept of assisting advertisers to understand the cost and communication effectiveness of their advertising via data pooling their real results in comparison to other advertisers. He was the architect of expanding the business from the UK into a European network and worldwide consultancy. He has worked on projects in over 40 markets worldwide. In 2005, Media Audits was purchased by Accenture, and is now a key component of Accenture Marketing Sciences.

Prior to joining Media Audits, Michael worked for Procter & Gamble and Nestle.