

Linda Jablonski
Inquiry Co-ordinator
Competition Commission
Victoria House
Southampton Row
London
WC1B 4AD

16 October 2007

Dear Linda,

BSkyB / ITV

Thank you for the invitation to make any final comments with respect to this review. We have refrained until now because the principal issues that we sought to raise before the Commission in early July were not recognised in its provisional findings.

Specifically :

- 1 that an SLC arising from collusion in advertising airtime sales resultant upon BSKyB's shareholding in ITV plc was unlikely to emerge, and to a lesser extent,
- 2 that the acquisition was unlikely to result in an SLC arising from a loss of rivalry in the wholesale provision of national television news or other programming, and/or as a result of common control of scheduling.

Despite their dismissal by the Commission, we continue solemnly to believe that both of these areas are real items for concern, and therefore offer our views on the remedies proposed from this perspective.

a Divestiture of the whole of BSKyB's shareholding in ITV

This level of intervention would assuage these concerns, but might be disproportionate.

b Divestiture of such part of BSKyB's shareholding in ITV that it would cease to have material influence over ITV

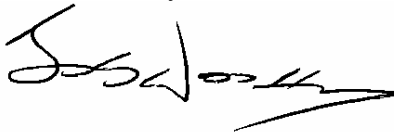
This level of intervention could also answer our concerns, dependent on the level chosen. Whilst we are not experts in corporate governance matter, commonsense suggests limiting the shareholding to below 10% would probably be effective. Any limit set above 10% might be rather less effective, and would in any event only require divestment of a relatively small share of ITV's total equity.

c Behavioural remedies to accompany partial divestiture remedies

We do not believe it is appropriate for us to recommend or comment on behavioural remedies for detriments that, to our regret, have not been recognised.

I hope you find this late input useful. As ever, I would be happy to answer any further questions you or colleague might have.

Yours sincerely,



Bob Wootton
Director of Media & Advertising