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Dear Sir/Madam:

On behalf of **21st Century Fox**, and **FOX International Channels**, we write in response to the Media Development Authority's (MDA) current Public Consultation on the Review of Consumer Protection Measures in Media Market Conduct Code.

21st Century Fox owns and operates one of the world's leading portfolios of cable, broadcast, film, pay TV and satellite assets. As FOX International Channels (FIC), we provide subscription television channels and digital media content to platform partners in Singapore under the FOX, FOX SPORTS, STAR and National Geographic Channel brands. FIC has grown significantly over the last several years, providing more than 30 channels and services for Singapore viewers.

In addition, FIC's National Geographic Channel creates Singapore-specific programs. Recent productions filmed in Singapore include "Every Singaporean Son", "World's Busiest Port", "Theme Parks Singapore" and the recent documentaries "Integrated Resorts" and "Gardens by the Bay" which will be aired globally.

Moreover, FIC via the STAR Chinese Movie Channel acquires for regional broadcast popular Singapore-produced films such as Anthony Chen's "Ilo Ilo." FIC is also increasingly involved in original Singapore-based film production, investing for example in "Lion Men," Jack Neo's new project and this year, Asia's Next Top Model will be produced in Singapore.

Across our channel brands we aim to serve the consumer a variety of content and we work with our pay TV partners to deliver these high quality programs at an affordable price. We are concerned that the proposed regulations could impact our ability to invest in exciting, new content and constrain the ability to compete fully in Singapore's increasingly dynamic and fast-paced market of media and entertainment.

Our specific concerns are related to the Unilateral Contract Variations, and the changes of "material detriment" in channel offerings and content offerings within specific channels. We believe it is important for consumers to have flexibility and choice, but we feel this policy will instead place unnecessary burdens on the pay TV ecosystem in Singapore.

This policy may deter us from continuing to invest and air content from emerging talent in Singapore. Local content production and investment in Singapore, and other regions across Asia, represents a substantial business risk. If this content proves unpopular with the consumer that may present them with an unjustified reason to instantly cancel their entire pay TV contract. This type of "consumer protection" could materially impact the business model of pay TV and create disincentives for channel brands when deciding whether or not to invest in innovative, local and regional content.

We think this policy overlooks the changing dynamics and competitive pressures that currently exist in the TV and video content space. As a company that is dedicated to entertaining our viewers, we feel we are in the best position to curate our content offerings and channel brands. This is our business. We

have the economic incentives from our pay TV partners, and most importantly, our viewers to get this content and channel mix right.

We operate in markets across the region and across the world. Although many markets have policies designed for consumer protection, this proposed policy is unique to Singapore. It seems misguided to craft consumer protection policies that are applicable only to the pay TV industry and micromanage content offerings on pay TV channels, while at the same time, overlooking the growing market of online video content not subject to any such constraints.

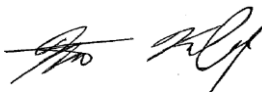
Although we may not always agree, we respect and adhere to the policies, codes and guidelines of Singapore, in particular, the rules implemented by the MDA. Much of the online video viewed in Singapore does not comply with MDA's content codes. The entities that provide this content are based outside Singapore and are not subject to Singapore's laws or licensing regime (e.g., Netflix or Youku Tudou viewed via VPN, android media boxes, unauthorised streaming sites and apps), yet pay TV may face increased regulations. This seems both unfair, ineffective and creates an un-level playing field for the operators based in Singapore.

In order to not overburden the pay TV industry with regulations, we believe a self-regulatory approach is the best solution. This would require the pay TV operators to make it clear to consumers, prior to subscribing to the service, that some changes in content may be inevitable during the course of the contract term. Should this not be sufficient, the MDA could then consider requiring the operators to create a code of conduct covering these issues in more detail.

FOX International Channels prides itself as having "Brands with Fans!" To live up to that we are committed to providing Singaporeans the best content. The continued success of our channel brands depends on curation, constant innovation, and an understanding of Singaporean viewers.

We appreciate all of the hard work of the Media Development Authority, and we are grateful for the opportunity to express our views on this issue. Ultimately, we believe the proposed Unilateral Contract Variations will place unnecessary burdens on the pay TV industry and we believe a self-regulatory approach is the more effective policy option.

Sincerely,



Matthew Kurlanzik
Director
Government Relations, Asia
21st Century Fox
Hong Kong