



Information Policy and Compliance
bbc.co.uk/foi

21 November 2007

Dear Mr

Freedom of information request – RFI2007000892

Thank you for your request received on 24 October 2007 (clarified by e mail on 27 October 2007) seeking further information about TV Licensing. Your request is being dealt with under the Freedom of Information Act 2000 (“the Act”).

Please note that “TV Licensing” is a trading name used by companies contracted by the BBC to administer the collection of television licence fees and enforcement of the television licensing system. The majority of the administration of TV Licensing is contracted to Capita Business Services Ltd (which undertakes the majority of the administration of the TV Licensing system), with the administration of our cash related payment schemes contracted to Revenues Management Services Ltd (RMS). PayPoint Network Ltd and PayPoint Collections Ltd are contracted to provide over-the-counter services. The marketing and public relations activities are contracted to the AMV Consortium. The consortium is made up of the following four companies: Abbott Mead Vickers BBDO Ltd, Fishburn Hedges Boys Williams Limited, PHD Media Limited and Proximity London Ltd. The BBC is a public authority in respect of its television licensing functions and retains overall responsibility.

In your emails you asked the following (I have combined your messages and numbered your questions for ease of reference):

1. *I am interested in whether or not your advertising has shown an increase in people paying for there TV License during your campaign and for the long term, rather than waiting for reminders etc. Having looked throughout your website i have found lots of information on the detection of people who haven't paid but i have been unable to find information on your advertising and success of it.*



INVESTOR IN PEOPLE

Please see my answers below for responses to this general question.

2. *When did your start major advertising for TV Licensing?*

The BBC assumed responsibility from the Home Office for the administration and enforcement of the licensing system in 1991 and began activity to advertise the need to be licensed, the ways to pay and the consequences of non-payment from this date. This has been achieved through TV trails on BBC channels and occasional advertising campaigns using commercial media (mainly consisting of roadside posters and more recently online banners).

Unfortunately, I am unable to provide detailed information relating to TV Licensing's advertising before 1991, although our understanding is that numerous advertising campaigns have been run on commercial television since the 1960s

3. *When did start to become more aggressive/warning about the penalties?*

It is not the case that advertising today is more authoritarian or aggressive than advertising in the past. If anything, I understand that TV Licensing's research of some commercial TV advertisements from the 1980s indicates that the reverse is true.

4. *What is the rough annual spend on advertising for this?*

The broad answer to your question is contained in the attached document *TV Licensing Costs of Collection* which you will see contains general information on communications costs, including reminders and information campaigns.

I can confirm that we hold the more specific information that you have requested on the cost of advertising. However, I am withholding this information under s43 of the Act. Section 43 states that information will be exempt under the Act if its disclosure under the Act would, or would be likely to, prejudice the commercial interests of any person (including the public authority holding it).

As stated above, "TV Licensing" is a trading name used by companies contracted by the Licensing Authority (the BBC) to administer the collection of television licence fees and enforcement of the television licensing system. Details of specific information regarding advertising costs correlates closely with the total amount paid to the AMV Consortium. Releasing this would therefore be likely to prejudice the commercial interests of the BBC and the AMV Consortium as this relationship is in itself commercial and releasing the figures we hold would prejudice the AMV Consortium's commercial interests, and thus in turn, the BBC's commercial interests.

I am satisfied in terms of section 2(2) of the Act that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information. I have considered the public interest test in the section on why information has been withheld below.

5. *Detailed breakdown of all TV License Advertising including:*

a) *dates of Advertising campaigns*

As stated above, we can only provide detailed information from 1991 onwards. However, I estimate that compiling information to provide dates of all advertising campaigns since the BBC assumed responsibility for the licensing system, as well as the information requested in your other questions below, would take more than two and a half days. Under section 12 of the Freedom of Information Act, we are allowed to refuse to handle the request if it would exceed the appropriate limit. The appropriate limit has been set by the Regulations (SI 2004/3244) as being £450 (equivalent to two and a half days work, at an hourly rate of £25).

I have narrowed your request so that I can deal with it within this cost threshold and am therefore happy to provide the dates and durations of advertising campaigns which have been or are due to be run in 2007. I have answered your remaining questions below in the same way. If you require further information on any of these issues, please write to us again specifying the dates and specific information you are interested in and we will be happy to address your additional queries.

Please note that some of the campaigns listed below were/are national and some were/are local. However, although we hold information concerning in which specific areas the local campaigns ran, I am withholding this under section 31(1)(a),(b),(d) and (g) of the Act which relates to law enforcement, specifically, that disclosure would, or would be likely to prejudice the prevention or detection of crime. This is because some local campaigns are specifically targeted at areas of high evasion and releasing this information may therefore disclose trends, the knowledge of which would prejudice our ability to prevent evasion of the TV licence payment (for example, where there is a higher rate of evasion in a local area, someone may be less likely to purchase a licence on the basis of their assumptions on the risk of being caught).

I am satisfied in terms of section 2(2) of the Act that in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information. I have considered the public interest test in the section on why information has been withheld below.

Advertising campaigns which have been or are due to be run in 2007:

TV Trails on BBC TV in 2007

- January (3 weeks)
- April (4 weeks)
- October to November (6 weeks)
- Please note: the BBC is a public service broadcaster and does not raise revenue through advertising. Any communications concerning the TV licence which are run on BBC channels are therefore referred to as 'trails'.

Radio Trails on BBC National & Local Radio

- January (2 weeks)
- May (2 weeks)
- September (2 weeks)
- November (2 weeks)

Online features on BBC.co.uk website

- May (3 weeks)
- November (2 weeks)

Online advertising on commercial websites

- MSN Hotmail (throughout 2007)
- streetmap.co.uk (selected months)
- multimap.co.uk (selected months)
- placement via advertising networks (throughout 2007). Advertising networks place advertising on multiple websites. They enable media owners to sell spare advertising inventory and organisations to buy advertising space cheaply. In return for a lower cost, TV Licensing does not specify to the network which sites their adverts should appear on and I am therefore unable to provide a comprehensive list (although it would include sites such as Cricinfo.com, ESPN.com and Yell.com). However, TV Licensing does stipulate certain sites which should be avoided (for example, sites with inappropriate sexual content).
- student specific websites (TV Licensing appears on a range of student websites during the academic year)

Poster adverting

- June (4 weeks)
- August (4 weeks)
- October (4 weeks)

Classified listings (online, printed and directory enquiries)

- BT phone books
- Yellow Pages

- Thomson local
- Some other local directories
- Please note: all of these are permanent placements

Other

- Advertising in student union bars (throughout academic term)
- b) Cost of each advertising campaign (with dates)*

Please see my answer to question 4 above.

- c) Evaluation reports form each campaign and any further reviews*

The kinds of information which provide the BBC with evaluation for advertising campaigns in relation to TV Licensing includes:

- tracking studies, which measure the public awareness of our communications and public attitudes towards licence fee payment.
- analysis of the number of calls received by TV Licensing call centres
- analysis of the number of 'click-throughs' to the TV Licensing website
- analysis of licence sales figures in areas where local campaigns have been run

I have provided some information regarding calls to the call centres and website 'click-throughs' in my responses to questions 7 and 8 below. However, I estimate that compiling the remaining information you have requested to provide evaluation from each campaign in 2007 would take more than two and a half days. As stated above, under section 12 of the Freedom of Information Act we are allowed to refuse to handle the request if it would exceed the appropriate limit. The appropriate limit has been set by the Regulations (SI 2004/3244) as being £450 (equivalent to two and a half days work, at an hourly rate of £25).

If you require further information, please write to us again narrowing your search criteria and we will be happy to address your additional queries. However, please also note that some specific tracking studies, analysis or other research may be withheld from release under section 31(1)(a),(b),(d) and (g) of the Act which relates to law enforcement, specifically, that disclosure would, or would be likely to prejudice the prevention or detection of crime. This is because they contain information which could be useful to people attempting to evade the licence fee.

- d) any research, evaluation, statistics relating to the Student Campaign of the past 4 years*

For a broad answer to this question, please see my answer to question 5c above.

For more specific information, you may find the enclosed document *50 Pints or a TV Licence?* useful. This paper contains a case study of the TV Licensing student campaign which was written by Proximity London for the Institute of Practitioners in Advertising (IPA) Effectiveness Awards 2006. You will see it documents how TV Licensing's integrated campaign with regard to students established a new 'norm' on campus in place of evasion between 2002 and 2006. The study is also publicly available in *Advertising Works 15: Proving the Effectiveness of Marketing Communications* (World Advertising Research Center, Oxfordshire 2007).

For the questions 6, 7 and 8, you asked for weekly breakdowns. However, I estimate that compiling this information on a weekly basis would take more than two and a half days. As stated above, under section 12 of the Freedom of Information Act we are allowed to refuse to handle the request if it would exceed the appropriate limit. The appropriate limit has been set by the Regulations (SI 2004/3244) as being £450 (equivalent to two and a half days work, at an hourly rate of £25). So the information instead is provided on a monthly basis.

6. *Detailed weekly breakdown of numbers of Licences purchased*

A breakdown of the volume of licences sold **by month** in 2007 is given below:

Month	Net Sales
Jan-07	2,160,457
Feb-07	2,023,864
Mar-07	2,129,289
Apr-07	1,513,580
May-07	1,679,624
Jun-07	1,684,685
Jul-07	1,724,559
Aug-07	1,742,891
Sep-07	2,037,234
Oct-07	3,877,804

7. *Weekly breakdown of numbers of enquires to TV License by
(a) telephone, (b) e-mail/web*

A breakdown of the number of enquiries via telephone and e-mail **by month** in 2007 is given below:

Month	Telephone calls received	E-mails received
Jan-07	1,194,746	26,270
Feb-07	972,926	22,407
Mar-07	1,031,748	21,848
Apr-07	773,737	18,249
May-07	808,147	18,995

Jun-07	797,612	19,927
Jul-07	850,126	23,854
Aug-07	848,358	25,812
Sep-07	876,503	29,008
Oct-07	1,143,528	38,270

8. *Weekly breakdown of 'click-throughs' to the TV Licensing website*

A breakdown of the number of visits to the TVL website **by month** in 2007 is given below:

Month	Visits to website
Jan-07	475,489
Feb-07	420,543
Mar-07	499,028
Apr-07	368,452
May-07	416,745
Jun-07	436,703
Jul-07	466,593
Aug-07	475,297
Sep-07	613,158
Oct-07	711,424

9. *Monthly breakdown of Direct Debit take up since the payment method started.*

You requested this information since the payment method started. I estimate that compiling the information on this basis would take more than two and a half days. As stated above, under section 12 of the Freedom of Information Act we are allowed to refuse to handle the request if it would exceed the appropriate limit. The appropriate limit has been set by the Regulations (SI 2004/3244) as being £450 (equivalent to two and a half days work, at an hourly rate of £25). So the information instead is provided on a monthly basis. We have therefore answered this question for 2007.

A breakdown of Direct Debit licences in force in 2007 is given below:

Month	DD Licences in Force
January	13,041,644
February	13,127,397
March	13,208,397
April	13,267,428
May	13,319,781
June	13,371,826
July	13,418,815

August	13,462,093
September	13,518,155
October	13,579,061

Why information has been withheld

Questions 4 and 5

I am required under s 2(2) of the Act to assess whether the public interest in maintaining the exemptions outweigh the public interest in disclosing the information.

The following factors are in favour of disclosure:

1. ensuring that public funds are being appropriately applied, that is:
 - a. ensuring that the TV Licensing system is being efficiently run; and
 - b. ensuring that value for money is being obtained.

I consider that the above public interest factors in favour of disclosure are served by the following:

1. The attached document *BBC TV Licensing Costs of Collection*
2. The fact that the BBC has a duty to enforce the television licensing system and it is essential that effective deterrents against evasion are maintained for this purpose. Without an effective deterrent, evasion would invariably increase. This would be to the detriment of the honest majority of people who are properly licensed and to the overall amount of revenue available to the BBC.
3. The fact that the BBC is required to satisfy the National Audit Office ('NAO') as to the value for money of the collection and enforcement arrangements and is accountable for the economy, efficiency and effectiveness of such arrangements. NAO's most recent audit is published at http://www.nao.org.uk/publications/nao_reports/06-07/0607183.pdf.
4. The fact that the BBC has reduced the cost of collection from 6.2% of the total licence fee collected in 1991/2, when it took over from the Home Office, to 5% for the financial year 05/06. This demonstrates that the TV Licensing system is being efficiently run. This and further related information is available in the BBC's annual report (see www.bbc.co.uk), the TV Licensing Annual Review and the *About TV Licensing* document (see <http://www.tvlicensing.co.uk/aboutus/index.jsp>). A key part of this success has been the use of detection as a significant deterrent element.

In this instance, the public interest is served by maintaining an effective deterrent to licence fee evasion and thus in turn protecting the BBC's revenue stream.

There is hence a greater public interest in ensuring the effective collection of the licence fee than in disclosing the information you have sought. I am therefore satisfied, in terms of section 2 of the Act, that in all the circumstances of the case, the public interest in maintaining the exemptions outweighs the public interest (outlined above) in disclosing the information.

Appeal rights

If you are not satisfied with this response you have the right to an internal review by a BBC senior manager or legal adviser. Please contact us at the address provided, explaining what you would like us to review and including your reference number. If you are not satisfied with the internal review, you can appeal to the Information Commissioner. The contact details are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone 01625 545 700 or see <http://www.ico.gov.uk/>

I hope this response is helpful.

Yours sincerely,

Natalie Saunderson
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BBC TV Licensing Management Team