

Your response

Question	Your response
<p>Chapter 3.1</p> <p>Consultation question 1: Do you agree with our proposed approach to determining QWR? We would welcome comments in particular on:</p> <p>a) Our proposal to define QWR by reference to worldwide revenues.</p> <p>b) Our proposals in relation to apportioning revenue to the regulated service.</p> <p>c) Our proposed approach to requiring QWR to be aggregated across all regulated services provided by the provider.</p> <p>d) Our proposal to take account of revenues received by another group undertaking in the determination of QWR.</p> <p>Consultation question 2: Do you agree with our proposed definition of 'qualifying period'?</p> <p>Consultation question 3: Do you have any views on our proposal not to issue a statement to Part 4B services (VSPs) (under paragraph 21 of Schedule 17 to the Act)?</p> <p>Please provide evidence to support your responses.</p>	<p>Confidential? – Y / N</p>
<p>Chapter 3.2</p> <p>Consultation question 4: Do you agree with our proposal for determining the QWR of a group, when calculating the maximum penalty that may be imposed on a provider and one or</p>	<p>Confidential? – N</p> <p>I agree with the proposal for determining the QWR of a group. Particularly the section "whether or not attributable to the provision of a regulated service"</p> <p>During the data gathering period, you found some companies did not attribute revenues by service, so</p>

<p>more group undertakings which are jointly and severally liable for a breach under the Act, i.e. that it is determined as the sum of the worldwide revenues of the provider and each of its group undertakings, whether or not attributable to the provision of a regulated service? Please provide evidence in support of your response.</p>	<p>would rely on assumptions and judgement to allocate revenue for the regulated service. (see A6.3 below) If you had not included the proviso "whether or not attributable to the provision of a regulated service" there would be a clear loop hole for companies to exploit.</p> <p>Your paragraph: A6.3 Some providers told us they do not routinely track revenue per service or separately identify revenues associated with their services in the UK, and estimating such revenues could be time consuming. As such, in responding to the RFI, in some cases, providers i) estimated revenues associated with regulated services, by apportioning revenue between regulated and unregulated services and ii) estimated UK revenues for regulated services by apportioning relevant revenue between the UK and other geographic regions. Such apportionments relied on assumptions and judgement by providers.</p>
<p>Chapter 3.3</p> <p>Consultation question 5: Do you have any comments on our proposed advice to the Secretary of State to set a QWR threshold figure within the range of £200m to £500m, with a preferred figure of £250m, for all types of regulated services?</p> <p>Consultation question 6: Do you have any comments on our proposed exemption for providers with UK revenue less than £10m in a qualifying period?</p> <p>Consultation question 7: Do you agree that an exemption for services contributing to the public interest is not required at this time given the proposed QWR threshold and UK revenue exemption?</p> <p>Please provide evidence to support your responses.</p>	<p>Confidential? – N</p> <p>Consultation question 6:</p> <p>We need to ensure that there is not a loop hole that companies could break up and make themselves seem sub-£10m where actually they are bringing in more. Possibly this is your Group loop hole.</p> <p>We need to be aware that start-up social media companies can quickly be valued above £10m and yet not have that revenue. But even with lower revenue the number of users they have will still be large and the harm that they may be propogating may still be very significant.</p>
<p>Chapter 3.4</p> <p>Consultation question 8: Do you agree with our proposed approach to setting the amount of fees payable by providers above the QWR threshold?</p>	<p>Confidential? – Y / N</p>

<p>Please provide evidence to support your response.</p>	
<p>Chapter 4</p> <p>Consultation question 9: Do you agree with our proposals relating to supporting evidence, documentation and other information, and manner of notification, as reflected in our Notification Regulations (Annex 10)?</p> <p>Consultation question 10: Do you have any comments on the proposed Manner of Notification document in Annex 11 accompanying the Notification Regulations?</p>	<p>Confidential? – Y / N</p>
<p>Chapter 5</p> <p>Consultation question 11: Do you agree with our assessment of the potential impact of our proposals? If you disagree, please explain why.</p>	<p>Confidential? – Y / N</p>
<p>Overall</p> <p>Consultation question 12: Do you have further views / comments that you wish to make in respect of this consultation?</p> <p>Please provide evidence in support of your responses.</p>	<p>Confidential? – N</p> <p>I would like to make sure you are aware of what technology can do because I think Ofcom be ambitious in it's demands.</p> <p>Social media companies are fully aware of the possibilities of AI and the value of the data they hold. They have the employees with the skills to implement safety solutions. However, they are not using technology to it's full advantage to ensure safety of their users.</p> <p>For example, they do not seem to use AI to spot dangerous videos. If they do they are not strict enough in taking the content down because I assume they are incentivised to keep content up. As an example, I run Big Sister (https://bigsister.live) but we developed AI to recognise harmful images and message tone. It is designed to use an expert-developed "danger list" to spot problematic content and flag it to parents (without ruining the child's privacy). It's designed to go at the device level and see all the interactions and activities (social media agnostic). The technology is out there and</p>

	available and social media companies could be made to adhere to standards you set.
Annex A7 questions	
<p>Consultation question A1: In relation to our equality impact assessment, do you agree with our assessment of the potential impact of our proposals on equality groups? If you disagree, please explain why.</p> <p>Consultation question A2: Are you currently aware of any providers of regulated services targeting or providing support in any way to specific equality groups that are likely to generate a QWR that meets or exceeds the proposed threshold?</p> <p>Consultation question A3: In relation to our Welsh language assessment, do you agree that our proposals are likely to have positive, or more positive impacts on opportunities to use Welsh and treating Welsh no less favourably than English? If you disagree, please explain why, including how you consider these proposals could be revised to have positive effects or more positive effects, or no adverse effects or fewer adverse effects on opportunities to use Welsh and treating Welsh no less favourably than English.</p>	Confidential? – Y / N

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