

The Office of the Adjudicator Annual Report

April 2010

The following Report to Ofcom and the Office of Fair Trading sets out the Adjudicator's dispute determinations, his views about the operation of the Undertakings, the CRR scheme and CRR rules together with any recommendations, his views about the performance of Carlton and Granada (ITV plc) in complying with the Undertakings, his opinion about the evolution of the airtime sales market, and other relevant matters and information that he considers appropriate.

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Background

In November 2003, Undertakings were accepted by the Secretary of State for Trade and Industry pursuant to the Fair Trading Act 1973, section 88(2), from the Channel 3 Broadcasters Carlton Communications Plc (“Carlton”) and Granada Plc (“Granada”), as required of them by the Secretary of State as a condition of approval of the agreed merger of those Broadcasters to form ITV plc (“ITV”). These Undertakings required the appointment of an Adjudicator to adjudicate on any dispute between ITV and advertisers/media agencies that arise out of the interpretation or exercise of the rights or obligations set out under the Contracts Rights Renewal (“CRR”) remedy.

Paragraph 22 of the Contracts Rights Renewal Adjudication Scheme (“the CRRA Scheme”) provides that every 3 months (or as otherwise agreed with Ofcom) the Adjudicator shall make a written Periodic Report to Ofcom and the OFT. **This is the Annual Report for the fiscal period up to March 2010.** The Annual Report and the Report published in October each year are made available to the public.

Pursuant to paragraph 22 of the CRRA Scheme, this report sets out:

- the Adjudicator’s determinations in relation to disputes;
- the Adjudicator’s views about the performance of Carlton and Granada in complying with the Undertakings (in relation to CRR);
- the Adjudicator’s views about the operation of the Undertakings (in relation to CRR), the CRRA scheme and the CRRA rules together with any recommendations;
- other relevant matters and information that the Adjudicator considers it appropriate to include.

In addition, it has been agreed with Ofcom that these Reports will also contain information on the use of the Adjudicator’s budget to date. This information will not be placed in the public domain.

The level of information contained in this Report is sufficient as to inform Ofcom and the Office of Fair Trading adequately on each of these areas.

All confidential information contained within this Report is redacted from the public version.

1.0 Office of the Adjudicator

1.1 Core operating functions

1.1.1 The Adjudicator

In May 2006 Robert Ditcham was appointed as the Adjudicator.

1.1.2 The Office of the Adjudicator's staff

Richard Baker joined in December 2006 as deputy Adjudicator. In addition the Office of the Adjudicator ("Office") has an executive assistant, Claire Gilmour. Julian Gregory, a barrister at Monckton Chambers specialising in competition law, continues as consultant legal advisor.

1.1.3 Maintaining a secure office environment and procedures

Given the confidential nature of the information that the Office handles, security is a high priority. Access to Riverside House, where the Office is situated, can be gained only with the use of security cards. Furthermore, the Adjudicator has put in place additional procedures to ensure that the confidential information is fully protected. In particular, the Office:

- uses heavy duty safes to store all confidential information. These are kept locked at all times, and only members of staff at the Office have access to the safes;
- operates a clear desk policy;
- has a policy that generally no confidential documents should leave the building.

1.1.4 Access to appropriate information systems

The Office has online access to all of the industry data it requires, including data supplied by BARB, Donovan Data Systems and Nielsen Media Research. BARB, Donovan Data Systems and Nielsen Media Research have all been very helpful to the Office in setting these systems up and providing ongoing support. In addition, the Office has developed its own systems and processes for analysing key information.

1.1.5 Financial procedures

These are set in accordance with annex 3 of the Undertakings. Ofcom has set a budget for the total costs of the Adjudicator and his Office for each year in advance, after having consulted with ITV. Ofcom make payments in the first instance, but it invoices ITV on a quarterly basis for the actual costs incurred up to the maximum of the relevant budget.

1.1.6 The Office of the Adjudicator website

The Office's website is at www.adjudicator-crr.org.uk and houses all documentation relating to the Undertakings and the Office, including;

- the Undertakings;
- a 'technical guide to the CRR remedy';
- the process for disputes including any documentation needed to submit a dispute;
- the Adjudicator's Periodic Reports;
- updated guidance enquiries; and
- other news, in particular of the OFT's review of CRR.

1.2 Core process

1.2.1 Procedure for submitting disputes

The procedure for disputes is set out in the CRR rules (annex 3 of the Undertakings). For the purposes of clarification, the "Process for disputes" section on the Adjudicator's website explains key aspects of the procedure, such as the distinction between a dispute and a complaint, the importance of making a case clearly, and the need to include evidence and relevant documentation in the Notice of Adjudication (dispute form) ("NoA"). Prior to submitting a formal dispute, the Adjudicator recommends that potential complainants read this guidance as it will help them in formulating their case.

When a party wishes to submit a dispute, a NoA has to be completed. The NoA is a standardised form designed to minimise the administrative burden on all parties. It asks for details of the key facts and supporting evidence relating to the case. The submitted form should include a brief summary of the dispute, the number of discussions between both parties in relation to the dispute, details of the areas of change in the offer and the aspect of the offer to which the advertiser or media buyer objects along with the nature of the redress which is sought. ITV must also be sent a copy of this NoA. If the Adjudicator decides to act on the dispute, ITV must send a Notice of Reply setting out its response to the NoA.

The Office took the decision that it would give a detailed explanation for its decisions. Any confidential information provided by either party in support of its case is redacted in the explanation. The Office will make decisions on disputes using evidence supplied by the parties which is supplemented by other information to which the Office has access. Decisions will take into account, in particular, historical data, prevailing market conditions, the current contract between the parties and other contracts in the market. The decision by the Office is final and binding on ITV.

1.2.2 Confidentiality process

Confidentiality is of paramount importance to the operation of the Office. Confidentiality is maintained through the general office procedures set out at section 1.1.3 above and the way in which the Adjudicator deals with disputes. A limited number of people are involved in the dispute process. Confidentiality clauses are inserted on all documentation sent out to external parties involved in the dispute.

1.2.3 Maintaining information flows with ITV (Memorandum of Understanding)

A Memorandum of Understanding (“MoU”) was formalised with ITV in August 2004. This is a standardised process for the provision to the Office of certain general information and documents, i.e. information and documents that do not relate to specific disputes.

The MoU has facilitated the effective processing of information requests made by the Adjudicator, under paragraph 21 of the Scheme, ensuring that there is full and timely compliance by the provision of up-to-date information within a specified deadline, without over-burdening ITV. The MoU covers the provision of a number of different categories of information and documents, including in particular the following:

- copies of final sales contracts 2009/10. Where contracts are not available the Office will be supplied with a summary of the key terms on which media agencies/ advertisers are trading with ITV;
- a fortnightly report on the past, present and future position of the trading balance by ITV region;
- a full report on the treatment of all bookings made after the ABD (advance booking deadline); and
- a monthly summary of all DRTV (Direct Response Television) campaigns by region.

The MoU also puts in place regular status meetings between the Office and ITV, in which both parties are able to discuss any concerns that they might have in relation to the operation of the Undertakings. This includes a monthly meeting between the Office and ITV; a monthly meeting between a member of the Office and ITV’s sales operation controller and sales operation planning controller to discuss any issues arising from ITV’s trading balance figures; and a quarterly meeting between the Adjudicator and the ITV commercial sales director.

When considered necessary, to enhance the efficiency and effectiveness of the Office, the Adjudicator will propose any amendments deemed necessary to the MoU to ITV, either in relation to the provision of data or the timetable of such provision.

1.2.4 Interim reports process

The Undertakings state that the Adjudicator shall bring to the attention of Ofcom and the OFT any matter that gives rise to a reasonable suspicion on his part that ITV is not complying with the Undertakings. If such a matter arises the Adjudicator can submit a ‘Process and Interim’ report to Ofcom and the OFT.

1.3 Relationships with key stakeholders

In addition to the regular meetings with senior ITV staff, as laid out in the MoU, the Adjudicator has attended industry conferences, and held meetings since the last Periodic Report of October 2009 with a number of companies from the UK’s advertising community. These meetings are held regularly to allow the Adjudicator to seek views on the workings of the Undertakings and on the operation of the television marketplace

more generally. It is important for the Adjudicator to seek a broad range of opinions to understand fully the state of the market. The Adjudicator appreciates the time that these organisations provide the Office.

The Adjudicator has attended meetings with media representatives at the IPA and ISBA, the two main industry trade bodies, to seek their views of the operation of the CRR remedy. Comments from these bodies can be found in Section 5 of this Report.

2.0 Disputes and guidance

2.1 Disputes

The Office received no Notices of Adjudication since the last Annual Report in April 2009 in relation to disputes between media agencies/advertisers and ITV. This was also the case in the preceding 12 month period to April 2009 where there were no disputes.

The Undertakings have now been in force for six deal seasons and both ITV and agencies/advertisers are now generally aware of their rights and obligations under the Undertakings. Where clarification is needed agencies/advertisers have sought guidance from the Office - as discussed below.

2.2 Informal guidance

A total of 30 guidance enquiries were brought to the Office by advertisers and media agencies since the last Annual Report was published in April 2009. 13 of these came in the first half of the year (April - September '09) and 17 in the second half (October '09 - March '10).

This relatively balanced spread of guidance enquiries throughout the year is consistent with the pattern over the last three years. Previously, significantly more guidance enquiries occurred in the second half of the year when most contracts are negotiated.

Guidance enquiries received since the last Annual Report have related to the following issues, among others.

- Protected contracts
- Taking a holiday from ITV1
- Contract variations
- Charges applied by ITV to bookings made after the advanced booking deadline
- The movement of an advertiser within an agency deal moving agency
- The calculation of the ARM mechanic
- Accepting CRR as a fallback position
- The meaning of fair and reasonable within the Undertakings
- Receiving offers

When relevant the Office will from time to time post general guidance on to the Adjudicator website: <http://www.adjudicator-crr.org.uk/enquiries.htm>. Since the last Annual Report in April 2009 the following new guidance has been posted:

What are the rules concerning ITV seeking to conduct negotiations on an ITV family basis?

In responding to guidance enquiries, the Office cannot advise on individual contracts and negotiations. Nonetheless, where an enquiry falls within the remit of the Office, it is able to provide guidance by directing the parties to the relevant sections of the Undertakings and the technical guide. Any guidance provided is without prejudice to the view that may be taken by the Adjudicator if and when the issue is brought as a formal dispute, when further information relating to the issue may be available and may need to be taken into account (for example, details of historical precedents showing how the parties have dealt with similar issues in the past). The Office has adopted the practice of confirming any guidance in writing where appropriate.

3.0 Reporting on ITV's compliance

3.1 General considerations

Since the October 2009 Periodic Report ITV has continued to cooperate within the rules of the Undertakings.

3.2 Contracts

The Adjudicator is pleased to report that the provision of contractual information to the Office from ITV has been good during this period.

The formalised timetable that the ITV legal team devised to cover the contract agreement process continues to work well and is resulting a more efficient and clarified status of deal arrangements and eliminating potential uncertainties regarding contracts. The countersigning of contracts by advertisers and agencies is also occurring to a greater degree than occurred previously.

ITV continues to adopt the process of contract information provision suggested by the Office in 2008.

4.0 CRR Review and related issues/relevant matters

4.1 CRR Review

The Adjudicator is independent of both the Office of Fair Trading (OFT) and Ofcom - the bodies who carried out the preliminary CRR Review process. However, the Adjudicator engaged fully in that process, submitting full response documents to the OFT's initial statement of issues, subsequent supplementary questions and the January 2009 consultation entitled 'Review of the Contract Rights Renewal Undertakings'. In the final stage of the review the Office has provided information to and cooperated with the Competition Commission (CC).

On 12th May 2010, the CC concluded its review of CRR. The press release summarising the CC's conclusions is copied out below. The full final report can be read or downloaded from the Competition Commission's website:

http://www.competition-commission.org.uk/inquiries/ref2009/itv/pdf/final_report.pdf

COMPETITION COMMISSION



News Release

18/10

12 May 2010

CC PUBLISHES FINAL DECISION ON CRR

ITV's unrivalled ability to deliver large audiences on ITV1 means that the Contracts Rights Renewal (CRR) undertakings are still needed to prevent the channel from exploiting this position to the detriment of advertisers and other commercial broadcasters, the Competition Commission (CC) has concluded today.

The CRR undertakings allow buyers of advertising airtime to renew their existing contracts with ITV, adjusted to reflect the change in ITV1's audience share. In its final report on the undertakings, the CC has confirmed that the definition of ITV1 in the CRR undertakings will now be varied so that audience share on time shifted (+1) and high-definition ITV1 channels can be included in the CRR calculations. The CC has also renewed its call for an overall review of the system for selling television advertising.

CC Deputy Chairman and Chairman of the CRR Review Group, Diana Guy, said:

ITV1 remains a 'must have' for certain advertisers and certain types of campaign. Despite all the changes in this market, no other channel or medium can come close to matching the size of audience that ITV regularly provides. So the essential reason for the CRR undertakings remains: to protect advertisers and other commercial broadcasters from the enhanced market position created by the merger of Carlton and Granada.

There has been virtual unanimity among the advertisers, media agencies, commercial broadcasters and trade bodies we have heard from that CRR should be retained in some form. We believe that ITV has overstated the cost and distortions imposed by CRR. When it succeeds in making popular programmes which attract large audiences, CRR does not prevent ITV from reaping the rewards. We agree, however, that in order to avoid distortions, the definition of ITV1 should be widened to include +1 and high-definition channels.

Our review looked only at the circumstances surrounding the CRR undertakings in the context of the current television airtime trading system, a system which has a significant influence on the need for CRR to be retained in some form. Although we rejected ITV's alternative remedy proposals as ineffective to prevent ITV from worsening the deals it offers to advertisers, we have no wish to see CRR in place forever.

Many participants have told us that the system of selling television airtime is far from perfect and we repeat our concerns, also raised in 2003, about the potential anti-competitive effects of 'share of broadcasting' and agency 'umbrella' deals between broadcasters and media agencies. We continue to believe it appropriate for there to be a wider review of the whole system for selling TV advertising.

The CC found that:

- ITV1 retains the unique ability to deliver audiences of up to 18 million at a time, and in 2009, accounted for 982 of the top 1,000 most-watched programmes on commercial television.
- Despite the many changes in this market over recent years, ITV1's relative position of strength compared with other commercial broadcasters is little changed since 2003. Whilst ITV's share of commercial impacts (SOCl) has fallen since 2003, it remains by far the largest commercial broadcaster with a share more than double that of the next largest commercial channel (Channel 4). Media agencies and advertisers continue to believe that ITV1 offers them something that no other commercial channel can give. ITV1's price premium over other commercial channels has increased since the undertakings were introduced.
- Although the internet and the advent of many new digital channels provide possible alternatives for advertisers, these cannot yet replicate ITV's ability to deliver such large audiences on ITV1. The internet's growing share of overall advertising expenditure in the UK has been driven by classified advertising. Expenditure on internet display advertising—which is closest in nature to television advertising—was only a fifth of television advertising expenditure in 2009.
- Most advertising is bought through a small number of media agencies, who cannot credibly withdraw expenditure from ITV1 if they are to serve their clients' needs. Attempts to switch some of their spending elsewhere could still result in much less favourable terms, were it not for CRR.
- ITV has overstated the detrimental effects of CRR, which does not prevent ITV from producing good-quality programmes that people want to watch. The majority of media agencies have continued to negotiate at least to some extent with ITV rather than simply falling back on deals from years ago.
- Although the CC has a preference for a solution that will encourage competition rather than regulation, ITV's alternative remedy proposals would not be effective in preventing ITV from worsening the deals it offers to media agencies and advertisers.
- The definition of ITV1 in the undertakings should be widened to include any future ITV1+1 channel and the recently launched ITV1 high-definition channel so that impacts on these channels are included in the CRR calculation. The changes will come into effect once revised undertakings are agreed with ITV.

In May 2009, the CC was asked by the Office of Fair Trading (OFT) to review the undertakings and specifically whether circumstances had changed sufficiently since 2003 to warrant their removal or variation. The undertakings were introduced to protect advertisers and other commercial broadcasters from the loss of competition in the sale of television advertising airtime, following the merger of Carlton and Granada. (*See Notes to Editors.*)

Last September, the CC **provisionally concluded** that the CRR undertakings should be retained given ITV1's continued advantage in delivering large audiences for advertisers, although developments since their introduction in 2003 could justify some variations. Since that time the CC has been discussing these potential variations with ITV and other parties and has also received several further submissions from ITV including a number of variations on an alternative remedy proposal entitled 'Rules for the Protection of Advertisers' (RPA), on which the views of other parties were also sought.

Notes to editors

1. The CC is an independent public body, which carries out investigations into mergers, markets and the regulated industries.
2. The OFT formally launched a review of CRR in January 2008. This review was undertaken at the request of ITV plc in light of possible changes of circumstance in the sale of UK television advertising since the Undertakings were accepted in 2003.
3. On 29 May 2009 the OFT, with assistance from Ofcom, advised the CC to reconsider ITV's CRR Undertakings. A redacted version of the OFT's Advice, along with other information on the review, is available at:
www.competition-commission.org.uk/inquiries/ref2009/itv/index.htm.
4. The CRR Undertakings are a part (Clauses 5 to 11 and associated clauses) of a larger set of undertakings given by Carlton and Granada in 2003 following a report by the CC on the proposed merger of those two businesses to form ITV plc. The CRR Undertakings address concerns the CC had about the effect the enhanced market position of ITV plc would have on competition in the sale of television advertising airtime. Among other things, the CRR Undertakings allow buyers of advertising airtime to roll forward their pre-merger contracts, subject to annual adjustments which reflect the change in ITV1's share of ratings (measured in the form of its share of commercial impacts). The CRR Undertakings created the Office of the Adjudicator which is responsible for determining certain disputes arising under the Undertakings and which reports on compliance. For a full text of the CRR Undertakings and more information, see the Office of the Adjudicator's website: www.adjudicator-crr.org.uk.
5. The CRR Undertakings were accepted by the Secretary of State under section 88 of the Fair Trading Act 1973. Under the Enterprise Act 2002, the power to supersede, vary or release undertakings under section 88 passed from the Secretary of State to the CC.
6. The members of the Review Group are: Diana Guy (Review Group Chairman and Deputy Chairman of the CC), Robin Aaronson, Tony Stoller and (until the expiry of his term of appointment as a member of the CC at the end of January 2010) Robert Turgoose.
7. Further information on the CC and its procedures, including its policy on the provision of information and the disclosure of evidence, can be obtained from its website at www.competition-commission.org.uk.
8. Enquiries should be directed to Rory Taylor on 020 7271 0242 (email rory.taylor@cc.gsi.gov.uk).

4.2 Other matters

On 29 March 2010, Ofcom published its consultation on its Airtime Sales Rules Review. The consultation is focused on “the possible removal of the Airtime Sales Rules - two rules, which relate to how broadcasters sell TV advertising to media buyers and advertisers, referred to as the 'withholding rule' and the 'conditional selling rule'”.

The Office will not speculate on any potential outcome or the timing of any such conclusion. However, when the outcome is known the Office will consider publishing guidance on its website to clarify any impact upon CRR, as has been done in similar situations in the past (e.g. following the prohibition on advertising certain food and drink products and changes to children’s programming).

5.0 Stakeholders views of the operation of the Undertakings and the CRR scheme

This section details the verbatim replies received by the office of the adjudicator, following his request to the stakeholders for their views of the operation of the Undertakings and the CRR scheme. The views contained within each stakeholder response are the views of that stakeholder. They should not in any way be construed as the views or the opinions of the adjudicator.

5.1 ISBA view of the operation of the Undertakings and the CRR scheme



15th April, 2010

Robert Ditcham
Adjudicator CRR
Ofcom
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Dear Robert

Thank you for your letter dated April 1st, which I received from your colleague Claire Gilmour by email yesterday, requesting our comments on the recent operation of the CRR Undertakings. Given that there is little time before your deadline for comments, I am responding as promptly as I can.

Your letter rightly refers to the extensive inputs - many of which have now been made public - which ISBA has made to the OFT/Ofcom and Competition Commission reviews of the undertakings.

These show that ISBA and the large number of major advertisers it represents recognise that certain aspects of the UK broadcasting landscape have changed since CRR was introduced in 2003. However, ITV continues to dominate the market for UK commercial TV airtime, so we consider continued regulatory intervention necessary.

We supported the Provisional Decisions the CC published in September 2009 and January 2010, both of which concluded that CRR should remain in place but be extended to cover ITV1 +1 and ITV1 HD channels. (We note that ITV has now launched the latter).

We now await the CC's Final Decision in April, the date having been delayed when the CC elected to consult further on ITV's 'Rules For The Protection Of Advertisers, Version 2' just a few days before the original due date of February.

I would draw your attention to our responses to both versions of ITV's proposed 'Rules For The Protection Of Advertisers' as I feel they are particularly relevant to your request. In both of our responses, we reiterate our understanding that the Office of the Adjudicator, and its interventions both formal and informal, have been and remain essential components of effective intervention.

We have no further specific comments to make at this time, but as ever, please don't hesitate to contact me if you require any further information or comment.

With best wishes.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Bob Wootton', written over a horizontal line.

Bob Wootton
Director of Media & Advertising

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5.2 IPA view of the operation of the Undertakings and the CRR scheme



Institute of Practitioners in Advertising

Mr Robert Ditcham
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16th April 2010

Dear Robert

Adjudicators Report: October 2009 - March 2010

As requested, this letter reports on the operation of the TV Undertakings, the CRR mechanism and the Adjudicator's Office during the period from October 2009 to March 2010.

As with earlier papers, the usual enquiries have been made across a cross-section of IPA member agencies - although it has been interesting to note that respondents have been less immediate in responding than previously.

Probing reveals, however, that this has less to do with any alteration in the commercial tension that continues to characterise relations with ITV Sales, than a sense of being "researched out" by what appears to have been an almost continuous process of consultation by regulators, competition authorities and others over the last 12 months.

1. Operation of the Undertakings

As the Adjudicator will be aware, this period has witnessed a continuation of the Competition Commission's enquiries into the relevance of the Contract Renewal Rights mechanism - plus, more recently, initial discussions with /consultations published by, Ofcom on the Airtime Sales Rules and Minutage.

While important, these topics have been time-consuming for those involved and as a result, respondents have been less forthcoming with regard to this Adjudicator's Report than usual, believing that their feelings re the continued need for CRR have already been clearly expressed elsewhere.

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Having said this, follow-up telephone calls have confirmed that ITV has continued to maintain its "robust" approach to sales - taking the rules to the limit, and making use of all the negotiating techniques with which the Adjudicator will be familiar from previous reports (eg the tactical use of delay/conditional selling across the ITV family of channels etc etc.)

Both agencies and ITV Sales are now totally familiar with the opportunities for leverage within the terms of CRR and while ITV may feel the expansion of competing channels and changed market conditions have made the constraints of the current mechanism unnecessary, media buyers are under no misunderstanding as to their continued relevance.

2. How has CRR operated?

Few agencies reported the need to make referrals to the Adjudicator - although all continue to stress the importance of this facility in discouraging excessive behaviour on the part of the broadcaster.

3. The Adjudicator's Office

Linking into the above, IPA agencies continue to value the Office of the Adjudicator as much as for its deterrent value as for its actual intervention.

I hope this is useful. If you have any queries or require additional information, please do not hesitate to let me know.

A handwritten signature in black ink, appearing to read 'Geoff', with a large, sweeping flourish underneath.

Geoffrey Russell
Secretary and Director for Media Affairs