



**Joint Committee on Media, Tourism, Arts, Culture, Sports & the Gaeltacht  
Leinster House, Dublin 2**

**By Email: [osmrbill@oireachtas.ie](mailto:osmrbill@oireachtas.ie)**

**Your ref: OSMRB-1-43**

**Virgin Media Television submission to the Committee on the General Scheme of the Online Safety  
and Media Regulation Bill**

28 July 2021

**To: The Secretariat of the Joint Oireachtas Committee on the General Scheme of the Online Safety  
and Media Regulation Bill**

Virgin Media welcomes the opportunity to make a further submission to the Committee on the General Scheme of the Online Safety and Media Regulation Bill (the “Bill”) following the integration of the Broadcasting (Amendment) Bill 2019 and the inclusion of a number of additional Heads into the Bill.

Virgin Media thanks the Committee for its continued engagement on this important piece of legislation for the future of broadcasting in Ireland and welcomes any questions that the Committee may have on this submission which is supplemental to our original submission made on 18 March 2021, a copy of which is attached.

This important piece of legislation will establish a framework that must be fit for the digital age where, through our own research, we know there are on average 10 Internet connected devices being used by every home in the country, in addition to mobile Internet, digital platforms and what is, as we know, the Internet everywhere.

The regulation and restriction of harmful content is clearly one of the most important measures and intentions of the legislation, and this is something Virgin Media cares very deeply about, having taken many initiatives of our own in this area, as outlined in our submission.

In particular, we are supportive of the sections of the Bill that define categories of harmful content and the extension of these definitions, to include measures for the protection of children from age inappropriate content.

Virgin Media Television, Westgate Business Park, Ballymount, Dublin 24  
t. +353 1 419 3333 f. +353 1 419 3302 [www.virginmediatelevision.ie](http://www.virginmediatelevision.ie)



Registered in Ireland No.272612. Registered Office: Macken House, 39/40 Mayor Street, Upper Dublin 1  
Directors: Paul Farrell, Tony Hanway, Peter McCarthy and Max Adkins



However, when it comes to Internet Service Providers like Virgin Media, it is truly essential for members to understand that ISPs provide actual infrastructure or means of connectivity - the cable, the fibre, the actual physical network that you access – and this should not be confused with the regulation of hosted content.

Finally, Ireland needs a modernisation of our Broadcasting legislation. Current legislation (“Broadcasting Act 2009”) requires reform having been written more than ten years ago. As the Committee will be aware the changes that have occurred in the delivery of content since 2009 have been monumental.

We have a completely changed broadcasting and media landscape where new names such as Apple TV, Youtube live, Facebook live, Twitch, Now, Netflix, Disney, Amazon Prime and Smart TVs (Roku, Google TV and LG Samsung) are now all key players in what was traditionally a linear landscape and public service broadcasting model (in place over 60 years) that no longer effectively delivers public service content to the public.

The passing of updated and modern legislation to regulate audio visual media services into the future is now therefore more critically important than ever before.

The Committee is aware of the work being done by the Future of Media Commission as it looks at the future of public service broadcasting. This Bill you are examining should encompass the findings of the Future of Media Commission to ensure that what is put in place will serve the Irish audio visual sector well into the future, including on issues such as licensing, the manner of funding of public service broadcasting and digital platforms for public service media, all of which we mention in our submission.

Please find Virgin Media Television’s Supplemental Submission attached as Appendix 1 to this letter. Please note all of our comments made under our original submission continue to apply.

Please do not hesitate to contact us should you wish to discuss, or require clarification on any aspect of this. The undersigned can be contacted on email: [paul.farrell@virginmedia.ie](mailto:paul.farrell@virginmedia.ie).

Yours faithfully

A handwritten signature in black ink, appearing to read "Paul Farrell".

**Paul Farrell**  
**Managing Director**  
**Virgin Media Television Limited**