

**MULTICHOICE  
SUPPLEMENTARY SUBMISSION**

**DRAFT REGULATIONS  
REGARDING ADVERTISING,  
INFOMERCIALS AND  
PROGRAMME  
SPONSORSHIPS, 2022**

**3 AUGUST 2022**

## Introduction

- 1 MultiChoice welcomes the opportunity to provide supplementary submissions following the oral hearings on the draft Regulations Regarding Advertising, Infomercials and Programme Sponsorships, 2022 ("the **draft Regulations**").<sup>1</sup>
- 2 As we indicated in our written and oral submissions, we believe that the draft Regulations are generally on the right track. We have also noted that there is broad agreement between all the parties which made oral submissions on many of the specific provisions of the draft Regulations, such as product placement, sponsorship of current affairs, public service announcements, and penalties.
- 3 Our submissions are intended to assist the Authority in improving and refining the draft Regulations.
- 4 As requested by the Authority, we set out below –
  - 4.1 further submissions on product placement, including how it should be regulated and how it is distinguished from programme sponsorship;
  - 4.2 further submissions on our proposal for additional "non-contentious" news segments to be sponsored; and
  - 4.3 our proposals on which contraventions of specific regulations should attract penalties.
- 5 We have also taken the opportunity to briefly address the arguments made by some other parties regarding the need for further advertising limitations to be placed on MultiChoice.
- 6 Finally, for the Authority's ease of reference we have collated all MultiChoice's drafting proposals, including those made in our written submission of 1 June 2022 as well as the proposals captured in our presentation made in the course of the oral hearings, which is set out in **Annexure A**.

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<sup>1</sup> Draft Regulations Regarding Advertising, Infomercials and Programme Sponsorships, 2022 published under notice number 959, Government Gazette Number 46211, 8 April 2022

## Product placement

- 7 MultiChoice's understanding of product placement is in line with the definitions provided in the draft Regulations<sup>2</sup> – product placement is a type of sponsorship element which depicts a product or service within programming material (other than an advertisement) and so provides exposure for that product or service.
- 8 In MultiChoice's experience, the commercial arrangements around product placement differ.
- 9 In one scenario, marketers may pay broadcasters and / or producers to include specific products in programme material.
- 10 In another type of product placement, the broadcaster / producer may solicit from marketers the use of certain products or services which are required for a particular programme. In this scenario, the marketer will provide the product in exchange for the incidental exposure it receives from having its product depicted on air. For example, in the case of a cooking show, kitchen appliances will be required. Product placement might therefore provide for a certain brand of kitchen appliances to be used and shown in the course of the programme. In this way, product placement assists the producer / broadcaster (as goods are provided and a saving is made on production expenses) and also provides a return to the marketer by providing incidental exposure of their product.
- 11 In both scenarios where broadcasters enter into a commercial relationship with marketers on product placement, they always strive to ensure that the placement integrates seamlessly with the subject matter of the programme, is not overly intrusive and does not compromise editorial integrity. There would be no sense in undermining a programme's resonance with its audience. Broadcasters will always ensure that the product placement does not jar with the content or compromise its editorial integrity, as that would simply lead to viewers tuning out.

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<sup>2</sup> "Product placement" is defined in draft Reg. 1.17 as follows:

"'product placement' means the depiction of, or a reference to, a product or service in material (other than an advertisement) broadcast, in visual and/or audio form, in respect of which the BSL and/or the producer of the material concerned receives payment or other consideration and which promotes the interests of any person, product or service"

- 12 In MultiChoice's view, product placement is merely a sponsorship element and is not the same as a full programme sponsorship. Product placement does not allow for as strong an association with content as a full programme sponsorship does.
- 13 Programme sponsors may have naming rights and a variety of opportunities for commercial exposure around the content, though different sponsorship elements, including billboards, stings, squeezebacks, etc.
- 14 In contrast, the commercial exposure provided through product placement is usually more subtle and the brand association between the product and the programme is not as strong. There may also be multiple instances of different product placements in a single programme, whereas there will usually only be one headline sponsor for a particular programme (although there may be additional 2<sup>nd</sup> tier sponsors).
- 15 The Draft Regulations provide for three rules on product placement:
  - 15.1 It is not allowed in certain programmes (news and current affairs).<sup>3</sup>
  - 15.2 Where it is allowed, it must be subordinate to the content of the programme.<sup>4</sup>
  - 15.3 It must be signalled clearly, by means of a logo at the beginning and end of the programme in which it appears.<sup>5</sup>
- 16 MultiChoice is generally supportive of the Authority's approach, including the definition of "product placement", but has proposed two changes to these rules:
  - 16.1 Product placement should be prohibited only in news. It should be allowed in current affairs programmes.
  - 16.2 It should be signalled at the end of the programme in which it appears.

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<sup>3</sup> Draft Reg. 6.6

<sup>4</sup> Draft Reg. 6.7

<sup>5</sup> Draft Reg. 6.8

## **Sponsorship of non-contentious news segments**

- 17 MultiChoice supports the principle that editorial control of news must be safeguarded. But we also acknowledge that it is crucial there is some commercial funding of news. Without sufficient funding there is a risk that news programming is cut, or quality compromised.
- 18 The Draft Regulations permit two exceptions to the prohibition on news sponsorship; both weather and sports segments within news bulletins may be sponsored.
- 19 In the interests of providing further opportunities for commercial funding, in scenarios where sponsorship should not give rise to concern, we suggest widening the current exceptions to include other non-contentious segments which may be found in news bulletins.
- 20 We have suggested that the following "soft" news elements should be allowed to be sponsored:
  - 20.1 lifestyle - e.g., a news segment about the Queen of England's Jubilee celebration, the Ndlovu Youth Choir winning a SAMA Award, or the death of a celebrity;
  - 20.2 financial or business news - e.g., interest rate hikes, inflation rates, stock market developments, airline liquidation/business rescue; and
  - 20.3 human interest - e.g., a news segment about a lost hiker who was subsequently located, a teenager who invented a robot, or the introduction of new panda bears to a zoo.
- 21 As can be seen from these examples, while these matters are considered "news", they are - as with weather and sports segments within news bulletins - not controversial and there is no rationale for restricting their sponsorship.
- 22 To safeguard the protection of "hard" news, these non-contentious items should be packaged as stand-alone segments within a news bulletin, with the sponsorship provided for the permissible stand-alone segment/s only.

## Penalties

- 23 MultiChoice proposed a more nuanced, considered and proportionate approach to the penalties provision and urged the Authority to identify the most egregious of contraventions and specify maximum penalties only for those contraventions.
- 24 To this end, the Authority requested MultiChoice to make submissions on specific regulations whose contravention should attract penalties.
- 25 Our first point is that the Authority is not obliged to set out penalties in the regulations (let alone for every provision of the regulations). Various regulations do not prescribe any penalties at all, e.g., the current Advertising Regulations,<sup>6</sup> the Subscription Broadcasting Services Regulations,<sup>7</sup> and the Code of Conduct for Broadcasting Service Licensees Regulations.<sup>8</sup>
- 26 However, we recognise that it is good regulatory practice to set out reasonable and proportionate penalties in regulations, where deserved, so that regulated parties know in advance the consequences of a possible contravention.
- 27 In this regard, we reiterate that not all provisions of a regulation are deserving of a penalty. Rather than penalising the contravention of "*any provision set out in these Regulations*",<sup>9</sup> we submit that the contravention of only the most serious provisions of the draft Regulations should attract a penalty, having regard to the purpose of these draft Regulations (namely to protect consumers and children<sup>10</sup>) and the consequences of the contravention. Moreover, there are varying degrees of seriousness.

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<sup>6</sup> Regulations relating to the Definition of Advertising and the Regulation of Infomercials and Programme Sponsorship in respect of Broadcasting Activities, 1999, published under notice number 426, Government Gazette number 19922, 1 April 1999

<sup>7</sup> Subscription Broadcasting Services Regulations, 2006, published under notice number 152, Government Gazette number 28452, 31 January 2006

<sup>8</sup> ICASA Code of Conduct for Broadcasting Service Licensees, 2009, published under notice number 958, Government Gazette number 32381, 6 July 2009

<sup>9</sup> Draft Reg. 7

<sup>10</sup> Findings Document on the Review of the Independent Broadcasting Authority (Advertising, Infomercials and Programme Sponsorship) Regulations, 2022 ("**the Findings Document**"), April 2022 published under notice number 959, Government Gazette Number 46211, 8 April 2022, para 8.28.9.2

- 28 The penalties should apply only where a broadcasting licensee has knowingly contravened the regulation in question, and regard should be had to all the prevailing circumstances.
- 29 We agree with the Authority that the stipulated penalties should be the maximum penalties that may be imposed in respect of the respective contraventions.
- 30 Having regard to these principles, we propose the following maximum penalties for the Authority's consideration:

Regulation number	Overview of provision
<b>Category 1:</b>	<b>Provisions designed to safeguard the integrity of news and protect children: Maximum fine of R250,000</b>
Reg. 5.1	Transmission of infomercials during prime time or children's programming
Reg. 6.3	Prohibition on sponsorship of news
Reg. 6.6	Prohibition on product placement in news
Reg. 6.9	Prohibition on accepting programme sponsorship from any person who is prohibited by legislation
<b>Category 2:</b>	<b>Provisions designed to ensure that sponsorship is subordinate to the content of the programme: Maximum fine of R100,000</b>
Reg. 4.2	Primary purpose of the broadcast must be to promote the broadcasting licensee or the programme concerned
Reg. 6.2	Editorial control of sponsored programme must remain with the broadcasting licensee
Reg. 6.5	Sponsor's logo, etc. must be subordinate to the content of the programme
Reg. 6.7	Product placement must be subordinate to the content of the programme

- 31 On this basis, we propose that draft regulation 7 be amended to read as follows:

"7 Contravention and penalties

- 7.1 A licensee that contravenes regulations 5.1, 6.3, 6.6 and/or 6.9 is liable to a fine not exceeding R250 000 (two hundred and fifty thousand Rands).

- 7.2 A licensee that contravenes regulations 4.2, 6.2, 6.5 and/or 6.7 is liable to a fine not exceeding R100 000 (one hundred thousand Rands)."

### **Certain parties' attempts to use this process to impose restrictions on subscription broadcasters**

- 32 During the hearings certain parties continued to motivate for the Authority to impose advertising restrictions on subscription broadcasters.
- 33 The Authority has already correctly decided that this process is conducted in terms of s55(1) of the ECA, which is about the scheduling of adverts, infomercials and programme sponsorships, and that s60(4) of the ECA and licence conditions fall outside the scope of this inquiry.<sup>11</sup>
- 34 The proposals made by certain parties that the Authority should impose advertising restrictions on subscription broadcasters clearly falls outside the ambit of this process.
- 35 MultiChoice has therefore focused on making constructive submissions on those matters which properly fall within the scope of this process.
- 36 We urge the Authority not to be distracted by irrelevant submissions which fall outside the scope of this process. However, if the Authority is inclined to entertain submissions relating to s60(4) of the ECA, licence conditions or other proposed restrictions on MultiChoice/subscription broadcasters, kindly let us know so that we can engage with the Authority in that regard.

### **Commencement of Regulations**

- 37 While preparing this submission, MultiChoice realised that the draft Regulations are proposed to come into force immediately upon publication in the Government Gazette.<sup>12</sup>

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<sup>11</sup> Paras 3.1, 4.4.2 and 8.22.8.2 of the Findings Document

<sup>12</sup> Draft Reg. 9



38 However, the draft Regulations propose several substantive changes, which could take time to implement.

39 MultiChoice therefore recommends that the Authority allow for a grace period to phase in the amendments, and that the amended regulations should come into force six months after their publication in the Government Gazette.

## **Conclusion**

40 MultiChoice thanks the Authority once again for the opportunity to make this supplementary submission.

41 We trust that our input will assist the Authority in improving and finalising the regulations in terms of s55(1) of the ECA.

## ANNEXURE A: MULTICHOICE'S CONSOLIDATED DRAFTING PROPOSALS

Item	Draft Regulation	Topic	Text in Draft Regulations	MultiChoice's Proposed Amendments	MultiChoice's Proposed Text
1	1.11	Definition of current affairs programme	"Current affairs programme' means programming that is not a news bulletin, which focuses on and includes comment on and interpretation and analysis of issues of immediate social, political or economic relevance and matters of international, national, regional and local significance."	"Current affairs programme" means programming that is not a news bulletin, <u>but which is factual in nature and the primary purpose of which is to inform viewers which focuses on and includes comment on and interpretation and analysis of socio-political issues of immediate social, political economic relevance and matters of international, national regional and local current interest and significance.</u>	"Current affairs programme" means programming that is not a news bulletin, but which is factual in nature and the primary purpose of which is to inform viewers of socio-political issues and matters of current interest and significance.
2	1.13	Definition of news	"News' means programming that is not current affairs by a broadcasting service licensee in which it reports on news events of immediate social, political or economic relevance and on matters of international, national and local significance".	"News" means programming <del>that is not current affairs broadcast by a broadcasting service licensee</del> <u>BSL</u> , in which it reports on news events of immediate social, political or economic relevance and on matters of international, national and local significance, <u>but which is not a current affairs programme.</u>	"News" means programming broadcast by a BSL, in which it reports on news events of immediate social, political or economic relevance and on matters of international, national and local significance, but which is not a current affairs programme.
3	1.22	Definition of sponsorship element	"Sponsorship element' means marketing material which forms part of, or is superimposed on, broadcast programme material and includes on-screen corner	"Sponsorship element" means marketing material which forms part of, or is superimposed on, broadcast programme material <u>and includes such as</u> on screen	"Sponsorship element" means marketing material which forms part of, or is superimposed on, broadcast programme material such as on screen corner logos,

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			logos, opening middle and closing billboards, stings, squeeze backs, the on-air depiction of, or referral to, any brand, product or name, ribbons and crawls, naming rights, and product placements"	corner logos, opening middle and closing billboards, stings, squeeze backs, the on-air depiction of, or referral to, any brand, product or name, ribbons and crawls, naming rights, and product placements, <u>with a view to promoting a sponsor's name, trade mark, image, activities or product.</u>	opening middle and closing billboards, stings, squeeze backs, the on-air depiction of, or referral to, any brand, product or name, ribbons and crawls, naming rights, and product placements, with a view to promoting a sponsor's name, trade mark, image, activities or product.
4	1.18	Programme competitions	"Programme competition' means a competition that forms part of, or is linked to, a programme by way of a competition window, insert or slot, and which does not have the promotion of the commercial interests of a person, product or service."	"Programme competition" means a competition that forms part of, or is linked to, a programme by way of a competition window, insert or slot and which <u>may include</u> <del>does not have the</del> promotion of the commercial interests of a person, product or service <u>provided that is not as the primary purpose of the competition.</u>	"Programme competition" means a competition that forms part of, or is linked to, a programme by way of a competition window, insert or slot and which may include promotion of the commercial interests of a person, product or service provided that is not the primary purpose of the competition.
5	1.19	Definition of programme sponsorship	"Programme sponsorship' means the direct or indirect financing, whether partial or total, of the production or transmission of broadcast programme material by an advertiser or person with a view to promoting its own or another person's name, trademark, image, activities or product."	"Programme sponsorship" means <u>a commercial arrangement between a sponsor and a BSL wherein the sponsor pays the BSL to be associated with a programme</u> <del>the direct or indirect financing, whether partial or total, of the production or transmission of broadcast programme material by an advertiser or person</del> with a view to promoting <del>its own or another</del>	"Programme sponsorship" means a commercial arrangement between a sponsor and a BSL wherein the sponsor pays the BSL to be associated with a programme with a view to promoting the sponsor's name, trademark, image, activities or product.

Item	Draft Regulation	Topic	Text in Draft Regulations	MultiChoice's Proposed Amendments	MultiChoice's Proposed Text
				<p><del>person's</del> the sponsor's name, trademark, image, activities or product.</p>	
6	1.20	Definition of public service announcement	<p>"Public service announcement' means an announcement broadcast by a broadcasting service licensee aimed at providing information concerning a disaster or immediate grave danger to the public or in the interests of public welfare."</p>	<p>If the Authority confirms that the deleted portions in the current regulations, namely, "<i>aimed at imparting knowledge or information the dissemination of which is in the public interest and/or which attempts to solicit support for, or create awareness of, any non-profit organisation or any other organisation which conducts activities in the public interest</i>", fall within the ambit of an announcement we have no objection to the amended definition.</p> <p>If no public service announcements will be excluded by the new definition, then retain the proposed definition with the following amendment:</p> <p>"Public service announcement" means an announcement broadcast by a broadcasting service licensee aimed at providing information concerning a disaster or immediate grave danger to the public <u>and/or announcements</u> in the interests of public welfare.</p>	<p><b>If the proposed definition in the draft Regulations is retained, amend it to read as follows:</b></p> <p>"Public service announcement" means an announcement broadcast by a broadcasting service licensee aimed at providing information concerning a disaster or immediate grave danger to the public and/or announcements in the interests of public welfare.</p> <p><b>OR</b></p> <p><b>If the proposed definition will result in the exclusion of certain public service announcements which are currently included, then revert to the current provision in Reg. 1.18 of the 1999 Regulations which reads as follows:</b></p> <p>"Public service announcement" means a visual and/or audio announcement transmitted by a broadcaster and aimed at imparting knowledge or information the dissemination of which is in the public interest</p>

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				However, if the proposed definition will result in the exclusion of certain public service announcements which are currently included, then revert to the current provision in Reg. 1.18 of the 1999 Regulations.	and/or which attempts to solicit support for, or create awareness of, any non-profit organisation or any other organisation which conducts activities in the public interest".
7	1	Proposed new definition of "sponsor"	N/A	We suggest inserting a new definition of sponsor	"Sponsor" means a person who enters into a programme sponsorship agreement with a BSL in order to promote their name, trademark, image, activities or product.
8	1	Definition of the Advertising Regulatory Board	N/A	We suggest inserting a new definition for the "Advertising Regulatory Board".	"Advertising Regulatory Board" means the entity that replaced, and performs the same functions as, the Advertising Standards Authority of South Africa
9	2	Scope of Regulations	"These regulations are binding on every BSL who provides a television broadcasting service and a sound broadcasting service".	These regulations are binding on <del>every</del> <u>all television and sound BSLs who provides a television broadcasting service and a sound broadcasting service.</u>	These regulations are binding on all television and sound BSLs.
10	3.1	Code of Advertising Practice of the Advertising	"Every BSL must, in addition to complying with these regulations, comply with the Code of Advertising Practice of the	Every BSL must, in addition to complying with these regulations, comply with the Code of Advertising Practice of	Every BSL must, in addition to complying with these regulations, comply with the Code of Advertising Practice of

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		Standards Authority of South Africa	Advertising Standards Authority of South Africa, as required by section 55 (1) of the Act."	<del>the Advertising Standards Authority of South Africa</del> <u>Advertising Regulatory Board</u> , as required by section 55 (1) of the Act	the Advertising Regulatory Board, as required by section 55 (1) of the Act.
11	3.2	Code of Advertising Practice of the Advertising Standards Authority of South Africa	"To the extent that there may be inconsistencies between these regulations and the Code of Advertising Practice of the Advertising Standards Authority of South Africa in respect of any matter which falls within the jurisdiction of the Authority, these regulations shall prevail."	To the extent that there may be inconsistencies between these regulations and the Code of Advertising Practice of the <del>Advertising Standards Authority of South Africa</del> <u>Advertising Regulatory Board</u> in respect of any matter which falls within the jurisdiction of the Authority, these regulations shall prevail.	To the extent that there may be inconsistencies between these regulations and the Code of Advertising Practice of the Advertising Regulatory Board in respect of any matter which falls within the jurisdiction of the Authority, these regulations shall prevail.
12	4.1.2	Replacement of reference to the Advertising Standards Authority of South Africa with reference to the Advertising Regulatory Board	"The definition of "advertisement" shall be used by the Authority to distinguish between programme material, advertisements, infomercials, and programme sponsorships transmitted by BSL, for the purposes of determining whether jurisdiction in respect of complaints concerning material transmitted by BSL vests in the Complaints and Compliance Committee or the Advertising Standards Authority of South Africa."	The definition of "advertisement" shall be used by the Authority to distinguish between programme material, advertisements, infomercials, and programme sponsorships transmitted by BSL, for the purposes of determining whether jurisdiction in respect of complaints concerning material transmitted by BSL vests in the Complaints and Compliance Committee or the <del>Advertising Standards Authority of South Africa</del> <u>Advertising Regulatory Board</u> .	The definition of "advertisement" shall be used by the Authority to distinguish between programme material, advertisements, infomercials, and programme sponsorships transmitted by BSL, for the purposes of determining whether jurisdiction in respect of complaints concerning material transmitted by BSL vests in the Complaints and Compliance Committee or the Advertising Regulatory Board.

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13	4.1.3	Purpose of the definition of "advertising"	"... in the case of BSL who provide a television broadcasting service, regulating the amount of advertising that may be transmitted."	<del>... in the case of BSL who provide a television broadcasting service, regulating the amount of advertising that may be transmitted</del> <u>scheduling of adverts, infomercials and programme sponsorships</u> ".	...regulating the scheduling of adverts, infomercials and programme sponsorships.
14	6.2.1	Sponsor influence	"Every BSL must: in respect of every programme sponsorship obtained or accepted by it, enter into a written sponsorship contract with the sponsor which shall provide that the sponsor shall not be entitled in any way to influence the content or scheduling of the sponsored programme; and".	Every BSL must: in respect of every programme sponsorship obtained or accepted by it, enter into a written sponsorship contract with the sponsor which shall provide that the sponsor shall not be entitled in any way to <del>influence</del> <u>control</u> the content or scheduling of the sponsored programme; and	Every BSL must: in respect of every programme sponsorship obtained or accepted by it, enter into a written sponsorship contract with the sponsor which shall provide that the sponsor shall not be entitled in any way to control the content or scheduling of the sponsored programme; and
15	6.3	Programme sponsorship of current programme affairs	"A BSL who provides a television broadcasting service must not obtain or accept any programme sponsorship from any person in respect of any news or current affairs programme."	A BSL who provides a television broadcasting service must not obtain or accept any programme sponsorship from any person in respect of any news <del>or current affairs programme</del> .	A BSL who provides a television broadcasting service must not obtain or accept any programme sponsorship from any person in respect of any news.
16	6.4	Sponsorship of news	"Notwithstanding sub-regulation 6.3, a BSL who provides a television broadcasting service shall be entitled to obtain or accept a programme sponsorship in respect of a weather forecast or sports result bulletin, which constitutes part of a news	Notwithstanding sub-regulation 6.3, a BSL who provides a television broadcasting service shall be entitled to obtain or accept a programme sponsorship in respect of a weather forecast or sports result bulletin, <u>lifestyle, financial or business news and human</u>	Notwithstanding sub-regulation 6.3, a BSL who provides a television broadcasting service shall be entitled to obtain or accept a programme sponsorship in respect of a weather forecast or sports result bulletin, lifestyle, financial or business news and human

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			programme broadcast by that BSL".	<del>interest segments</del> which constitutes part of a news programme <del>or channel</del> broadcast by that BSL.	interest segments which constitute part of a news programme or channel broadcast by that BSL.
17	6.6	Prohibition of product placement in current affairs programme	"A BSL must not permit any product placement in any news or current affairs programme transmitted by it."	A BSL must not permit any product placement in any news <del>or current affairs programme</del> transmitted by it.	A BSL must not permit any product placement in any news transmitted by it.
18	6.7	Prohibition of product placement in current affairs programme	"Product placement in programming other than news and current affairs shall be subordinate to the content of the programme material."	Product placement in programming other than news <del>and current affairs</del> shall be subordinate to the content of the programme material.	Product placement in programming other than news shall be subordinate to the content of the programme material.
19	6.8	Product placement	"Product placement must be signalled clearly, by means of a logo, at the beginning of the programme in which the placement appears, and at the end of the programme".	Product placement must be signalled clearly, <del>by means of a logo, at the beginning of the programme in which the placement appears, and at the end of the programme</del> <u>in which the placement appears</u> ".	Product placement must be signalled clearly at the end of the programme in which the placement appears".
20	7	Penalties	"A licensee that contravenes any provision set out in these Regulations is liable to a fine not exceeding 10% of the licensee's annual turnover and/or a fine not exceeding R3 000 000 (three Million Rand)".	<del>"A licensee that contravenes any provision set out in these Regulations is liable to a fine not exceeding 10% of the licensee's annual turnover and/or a fine not exceeding R3 000 000 (three Million Rand)".</del> <u>7.1 A licensee that contravenes regulations 5.1, 6.3, 6.6 and/or 6.9 is liable to a fine not exceeding R250 000</u>	7.1 A licensee that contravenes regulations 5.1, 6.3, 6.6 and/or 6.9 is liable to a fine not exceeding R250 000 (two hundred and fifty thousand Rands). 7.2 A licensee that contravenes regulations 4.2, 6.2, 6.5 and/or 6.7 is liable to a fine not exceeding R100 000



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				<p><u>(two hundred and fifty thousand Rands).</u></p> <p><u>7.2 A licensee that contravenes regulations 4.2, 6.2, 6.5 and/or 6.7 is liable to a fine not exceeding R100 000 (one hundred thousand Rands).</u></p>	<p>(one hundred thousand Rands).</p>