



INFORMING SUPPORTING CAMPAIGNING

Francesco Savino  
Senior Associate  
Competition Group  
Riverside House  
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Dear Mr Savino,

**Competition Act investigation into the joint selling arrangements for live audio-visual rights by The Football Association Premier League Limited ('PL'): invitation to comment**

We are writing in response to your letter dated 21st November 2014, in which you ask for our views on a number of issues. We regret that we were unable to respond within your original deadline of 28th November 2014, but as we have discussed by telephone in the meantime, we were keen to consult as widely as possible within our membership before formulating a response. We are also aware that since we circulated your questions among our members and affiliates, a number of them have responded to you directly, and we trust that you have found this input useful.

We are grateful that you have sought our views on these matters, and look forward to further opportunities to comment on issues raised by your investigation, as you suggest.

There are three particular points that we would wish to register with you in response to the issues raised in your letter.

Firstly, the Football Supporters' Federation strongly supports the principle of the collective selling by the FA Premier League of audio-visual rights for matches played under its auspices. This collective selling, as opposed to a free-for-all with individual clubs selling rights to their own games individually, enables an element of more equitable income distribution between clubs in the Premier League, thereby helping to maintain a genuine competitive edge within the competition.

Secondly, the FSF strongly supports the enforcement of the "closed period" for the live broadcasting of matches, between 14.45 and 17.15 on Saturdays. The Saturday 15.00 kick-off is part of the tradition of English football, and maintaining that is not only important to many supporters of Premier League clubs, it is also crucial to the economic survival of many clubs lower down the football pyramid.

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Thirdly, the Football Supporters' Federation is opposed to any significant increase in the total number of Premier League matches televised live each season. The presence and contribution to atmosphere of match-going fans, particularly those travelling to their club's away games, are crucial components of the 'product' that broadcasters wish to purchase, and it is our belief that an increase in the number of matches taking place elsewhere in the football calendar and schedule would have a detrimental impact on match atmosphere and the interests of those supporters, our members.

In the context particularly of this third point then, it is inappropriate and impracticable for us to comment on individual matches in the list you have supplied of 106 Premier League matches played outside the Saturday afternoon closed period. In selecting matches for live broadcast, consideration is given to sharing out matches between clubs and a balance is struck between the contending financial and sporting interests of all 20 Premier League members. Singling out other matches as possible contenders for broadcast cannot be done in isolation, out of the context of the overall considerations, without breaching the principle of a limit on the total number of televised live matches.

We trust that the above responses are useful in informing your deliberations, and we remain available to you for any further clarification on these or any other related issues.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Miles', written in a cursive style.

Kevin Miles  
**Chief Executive**  
**Football Supporters' Federation**