

**Comparative study on the impact of control measures on the television
advertising markets.**

REPORT : TURKEY

INTRODUCTION

This report is aimed at comparing the legal data on the one hand and the economic data on the other hand related to the television advertising market in order to assess the impact of the applicable regulation on the sector's economy.

We have followed the regulatory structure of the Directive in order to:

1. remind the applicable rules in Turkey and compare them with the regulatory standards foreseen by the Directive
2. confront those rules with the economic data issued from CARAT's reports (cf « *Quantitative impact of the regulation on TV advertising markets in EU Member States, EEA countries, the new Member States and a number of third countries* »)
3. draw a first list of conclusions on the impact of regulation on the television advertising market or raise some questions for future analysis.

The present study is based on 2003 data, as a reference year, compared with 2002.

As mentioned in the call for tender documentation (ref. 2003/S 107 - 095378 DG EAC 44/03) and Carat's proposal, the selection of countries covered by the study has been based on local specificities, in order to guarantee that the studied landscapes are representative.

The notion "Applicant countries" includes Czech Republic, Hungary, Poland, Romania and Turkey, since during the reference year of the study (2003) the first three countries, which are now Member States, were still candidate members. The reader should also take into account that the notion "European Union Countries" concerns data and analysis for 10 Member States, on the condition the necessary basic information is available.

In the report figures referring to "average data" were calculated taking into account the weight of every country (population) and the TV viewing time of their population (Weighted average). For the calculation of the "average duration of the interruptions" (tables 4,5,7), the channels without advertising have been excluded (e.g.: UK, Sweden and Germany during prime time). These countries have been taken into consideration in the "average number of interruptions per hour" in tables 7A and 7B (all channels).

When data are not available, the following symbol "-" is indicated. When data are available but results are zero, the following symbol "0" is indicated.

There are no standard figures available on the number of interruptions by type of programme, except in *Canada, Japan, USA, Poland and Belgium* where a specific analyse has been conducted (see Tab 6, 8 and 9 in the concerned report of these 5 countries).

In this Turkish report and despite all our efforts, audience figures and measurements of Pay TV's, local, non-domestic and international channels are unavailable.

The reader should bear in mind that certain economic patterns of the national markets are not always the direct, or indirect, consequence of the regulation. Other parameters have an influence on the economic situation of the studied media, in particular the overall volume of advertising investments.

The methodological explanatory note provides for useful indications to fully understand the way audience and advertising investments have been measured.

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<u>GENERAL INFORMATION</u>

1- The audiovisual landscape

Definitions

Audience rating

The « Rating » (%) is the portion of the audience which defines the average percentage of persons (adults universe) watching television during a defined period of time.

Prime time

Day part showing the highest individuals/households interest for TV watching ; this concept does not have a standard definition across the Member States, prime time slots are specific for each country and usually correspond to the end of the working hours till the end of the “social” evening.

Adult population

The adult definition is not a stable standard and may vary from one country to another. Usually the definition of “adult” corresponds to mature teenagers and older population. Often the legal definition of a “child” or “minor” does not correspond to the definitions in use in the advertising market.

Adult population universe

Number of individuals corresponding to the definition of “adult population” in a given country.

Audience Rating, day parts and target definitions (period 2003)

Average Prime vs. All Day (index): ratio obtained by the division of the “average rating – all day” by the “average rating - prime time”. Gives an indication of how more important is the audience during prime time compared with the rest of the day.

Average Prime part : proportion of the Prime time versus All Day, in terms of audience (expressed by the “rating” factor). This proportion is weighted by the prime time duration.

TAB 1	TURKEY	European Union Countries (10)	Applicant countries (5)	Countries Outside European Union (3)	All Countries Observed (18)
Adult population definition	15+	13/16+	15/18+	18/20+	13/20+
Adult population universe	33.848.233	277.802.353	96.837.599	320.470.074	695.110.026
Average Rating - All Day*	16,0%	14,0%	16,7%	23,4%	18,7%
Average Rating - Prime Time*	34,7%	37,4%	39,8%	40,6%	39,2%
Prime Time slots definitions	19:00-23:59	18:55-23:00	18:30-23:00	19:00-23:00	19:00-23:00
Average Prime vs All Day (index)*	217	270	238	177	222
Average Prime part*	45%	34%	38%	26%	31%

* Weighted averages (cf. introduction)

Source : Carat

Comments

2- Socio economic data (2003)

TAB 2	TURKEY	European Union Countries (10)	Applicant countries (5)	Countries Outside European Union (3)	All Countries Observed (18)
Total Adv. Investments All Media (000 €)	8.666.904	106.902.530	14.958.765	153.876.973	275.738.268
Total TV Invest. (000 €)	6.472.230	37.370.852	10.518.887	88.420.354	136.310.092
Part of TV Invest.*	74,7%	35,0%	70,3%	57,5%	49,4%
Share of Top 5 channels on. Total TV Invest.*	73,9%	84,4%	82,5%	31,6%	50,0%
Average Top 5 Channels Audience Share*	59,2%	60,5%	72,1%	50,8%	57,7%
Adults population universes	33.848.233	277.802.353	96.837.599	320.470.074	695.110.026
GDP (mo €)	212.268	8.668.867	601.106	14.296.881	23.566.853
Average Total Adv. Invest. All Media / GDP*	4,08%	1,23%	2,49%	1,08%	1,17%
Average Total TV Adv. Invest. / GDP*	3,05%	0,43%	1,75%	0,62%	0,58%
Average Adv. Invest. / inhab. (€ per year)	256,1	384,8	154,5	480,2	396,7
Average TV Adv. Invest. / inhab.* (€ per year)	191,2	134,5	108,6	275,9	196,1

*Weighted averages (cf. introduction)
source : Carat (Eurostat and local private sources)

Comments

3- Types of broadcast and Audience Shares

Audience Shares

Share (%) of each channel of total TV audience.

Channels

All channels which data are available.

TAB. 3A

Adults

TURKEY	Name	Status	2003
Average Rating Audience % TOTAL TV (1)			16,0
			of which :
Channels with national coverage	ATV	Commercial channel free to air	13,5
	KANAL 7	Commercial channel free to air	5,0
	KANAL D	Commercial channel free to air	15,3
	SHOW TV	Commercial channel free to air	14,6
	STAR	Commercial channel free to air	5,2
	STV (Samanyolu)	Commercial channel free to air	2,8
	TGRT	Commercial channel free to air	8,0
	TRT1	Public service	6,8
	TRT2	Public service	1,7
	TRT3	Public service	-
Local channels	ANAMESAJ (Ankara)	Commercial channel free to air	-
	BRT	Commercial channel free to air	-
	CNBC-e	Commercial channel free to air	-
	CNN TURK	Commercial channel free to air	-
	DOGU TV (Erzurum)	Commercial channel free to air	-
	EGE MESAJ	Commercial channel free to air	-
	EGE TV (Izmir)	Commercial channel free to air	-
	FLASH	Commercial channel free to air	3,2
	ISIK TV (Ankara)	Commercial channel free to air	-
	KADIRGA (Trabzon)	Commercial channel free to air	-
	KANAL 5 (Antep)	Commercial channel free to air	-
	KANAL 6	Commercial channel free to air	0,8
	KANAL A (Ankara)	Commercial channel free to air	-
	KANAL TÜRK	Commercial channel free to air	-
	KARADENİZ TV (Istanbul)	Commercial channel free to air	-
	KON TV (Konya)	Commercial channel free to air	-
	KORDON TV (Izmir)	Commercial channel free to air	-
	KRAL/STAR 2	Commercial channel free to air	-
	MARMARA (Bursa/Bolge)	Commercial channel free to air	-
	MELTEM TV	Commercial channel free to air	-
	NTV	Commercial channel free to air	-
	RIZE TV (Rize)	Commercial channel free to air	-
	SELAM TV (Kocaeli)	Commercial channel free to air	-
	SHOWROOM (Istanbul)	Commercial channel free to air	-
	TRT4	Public service	-
	TRT5 (Int.)	Public service	-
	VIZYON (Istanbul)	Commercial channel free to air	-

TAB, 3B			Adults
TURKEY	Name		2003
Average Rating Audience % TOTAL TV (1)			16,0
			of which :
Non domestic channels	ARTE	Public service	-
	CNBC	Commercial channel free to air	-
	E! Television	Commercial channel free to air	-
	Hallmark	Commercial channel free to air	-
	MCM	Commercial channel free to air	-
	MGM	Commercial channel free to air	-
	RAI 1	Public service	-
	Reality TV	Commercial channel free to air	-
	RTL	Commercial channel free to air	-
	SAT 1	Commercial channel free to air	-
	TV5	Public service	-
ZDF	Public service	-	
International channels	BBC PRIME	Public service	-
	BBC WORLD	Public service	-
	CNN INT.	Commercial channel free to air	-
	DREAM TV	Commercial channel free to air	-
	EURONEWS	Commercial channel free to air	-
	EUROSPORT	Commercial channel free to air	-
	MTV EUROPE	Commercial channel free to air	-
	TV 5 EUROPE	Public service	-
	TVE INT.	Public service	-
Other channels	CINE 5	Pay TV (including adv breaks)	-
	SMAX	Pay TV (including adv breaks)	1,3
	Digiturk	Packaged TV, for details see Addendum 1	-
	Others	-	21,8
Total			100,0

(1) Definitions : Please, refer to Tab. 1 of this report
Highlighted channels are covered in the economic report.

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COMPARISON BETWEEN THE LEGAL AND THE ECONOMIC DATA

I. ADVERTISING IDENTIFICATION
(Article 10 Directive)

1. Separation of advertising from the programmes by optical and/or acoustic means
(Art.10.1 of the Directive)

Advertisements shall be clearly and easily distinguishable as such and be arranged such that they can be distinguished as 'separate' from the other items of the programme with respect to their visual and acoustic features. Moreover, the images or voices of persons presenting the news or daily programs on a regular basis shall not be used in advertising.

The broadcasts of the advertisements and teleshopping spots shall be clearly and easily distinguishable as such and be arranged such that they can be distinguished as 'separate' from the other items of the programme with respect to their visual and acoustic features.

The word 'ADVERTISEMENT' shall appear on the screen together with the 'advertisement jingle' at the beginning and end of each advertising broadcast for a sufficient period of time and in a fashion easily legible by the viewer.

Advertisements in the form of subtitles or logo as well as the window-advertisings shall appear on screen with a note reading "ADVERTISEMENT" written on the part of the screen where the advertisement is being broadcasted in a fashion easily distinguishable from the programme.

Impact on commercial practices

- The majority of advertising and teleshopping spots are included in traditional breaks. The average duration of a break is 315 seconds which is long compared to the average European practice. However, public channels have much shorter breaks (143 seconds) than private channels (338 seconds). The duration of the breaks on public channels is very close to the European average.
- Split screen techniques are used in Turkey and are called "Bant" commercials. Split screen used to be the only format out of traditional breaks but now other formats seem more attractive and therefore the use of split screen advertising is again decreasing;

Average duration of advertising interruptions
(seconds - all day)

TAB 4A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Break durations (#sec) - Total	246	129	165	199	-	188	185	136	143	236	185
Break durations (#sec) of Public Channels	173	90	140	126	-	157	221	129	0	0	140
Break durations (#sec) of Private Channels	257	146	202	201	-	197	180	147	143	236	195
Break durations (#sec) of Pay TV(including advertising)	-	83	107	-	-	-	-	101	-	-	-

* weighted average (cf. introduction)

Note that Telepromotions are excluded of these figures and have an average duration of 88 seconds in Italy.

TAB 4B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Break durations (#sec) - Total	132	167	120	83	315	-	105	141	185
Break durations (#sec) of Public Channels	72	105	100	71	143	-	-	-	140
Break durations (#sec) of Private Channels	150	238	128	85	338	-	105	141	195
Break durations (#sec) of Pay TV(including advertising)	-	153	51	-	-	-	-	-	-

* weighted average (cf. introduction)

Note that Telepromotions are excluded of these figures and have an average duration of 88 seconds in Italy.

2. Isolated advertising and teleshopping spots (Article 10.2 of the Directive)

There is no specific regulation on isolated spots.

Impact on commercial practices

In Turkey isolated spots are offered and used as a separate advertising format by broadcasters. Isolated spots are measured as advertising spots for audience and investment. It seems from the table below that on private channels short interruptions under 60 seconds containing 1 or few spots are close to the European average, but are very important on public channels.

Proportion of advertising interruptions under 60 seconds (all day)

TAB 5A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Total	-	27,4%	9,5%	13,5%	-	5,0%	7,5%	33,5%	20,6%	4,0%	12,8%
Public Channels	-	42,1%	9,7%	0,3%	-	7,0%	0,03%	29,6%	0,0%	0,0%	10,3%
Private Channels	-	20,9%	6,4%	13,9%	-	4,5%	8,7%	41,7%	20,6%	4,0%	13,3%
Pay TV (including advertising)	-	42,9%	25,3%	-	-	-	-	2,2%	-	-	-

* weighted average (cf. introduction)

Note that Telepromotions are excluded of these figures (Italy : 3% in public channels and 9% in privates channels).

TAB 5B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Total	25,2%	19,2%	23,1%	47,4%	12,9%	-	2,0%	12,0%	12,8%
Public Channels	49,9%	22,4%	24,4%	56,2%	27,0%	-	-	-	10,3%
Private Channels	17,6%	7,3%	21,6%	46,0%	11,0%	-	2,0%	12,0%	13,3%
Pay TV (including advertising)	-	28,6%	59,8%	-	-	-	-	-	-

* weighted average (cf. introduction)

Note that Telepromotions are excluded of these figures (Italy : 3% in public channels and 9% in privates channels).

3. Subliminal advertising

(Art. 10.3 Directive)

In Turkey subliminal advertising is expressly prohibited.

4. Surreptitious advertising

(Art.10.4 Directive)

Turkish regulation prohibits the use of surreptitious advertising.

Surreptitious advertising is defined as : *the representation in words, in pictures, by logo, corporate name and registered trade mark and by using reminding hints with a view to advertise the products, services, name, trademark or the activities of a producer of goods or a provider of services in programmes by the broadcaster in return for payment or for similar consideration*

Also prohibited according to the Turkish regulation is : “Unless clearly indicated as an ‘advertisement’, the products or services should not be presented in the programmes with the intention of advertising”.

Impact on commercial practices

Although the use of this technique is not allowed, according to the economic report it is used in Turkey since 2004.

Virtual advertising is used in Turkey but is not measured as a separate format.

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II. INSERTION PRINCIPLES (Art. 11 of the Directive)

Preliminary remarks

Figures in relation to the volume of advertising attributed to a type of programme (Film, Documentary, Series & Soaps, etc ...) include advertising inserted IN and BEFORE this type of programme. The term "insertion" is in conformity with article 11 of the Directive;

1. **Insertion of advertising and teleshopping spots between and during the programmes**

(Art. 11. Directive)

According to Turkish regulation, advertising must be inserted between programmes and advertising insertions between programmes can have a maximum duration of 8 minutes.

A period of minimum 20 minutes must elapse between two advertising breaks, whether inserted in or between programmes.

The Advertorials shall only be broadcasted between two autonomous programmes and they shall not exceed 5 (five) minutes.

Announcements made by the Broadcaster in connection with its own television programmes shall only be broadcasted between two autonomous programmes.

Advertising spots may also be inserted during programmes in such a way that the integrity, value of the programme and the rights of the rights holders are not prejudiced. In case of insertion of any advertising during programmes, advertising time shall not exceed 5 minutes (*more restrictive than the Directive*).

In programmes consisting of autonomous parts or in sports and music programmes and similarly structured events and performances containing intervals, advertising spots shall only be inserted between the parts or in the intervals provided; provided that a period of at least 20 minutes should elapse between two advertising breaks.

If the schedule duration of feature film or films made for television is more than 45 minutes, advertisements may be broadcast once at the end of first period of 45 minutes, and at twenty minutes interval for each following period of 45 minutes.

News bulletins, current affairs programmes, religious programmes and children's programmes, when they are less than 30 minutes of duration, shall not be interrupted by advertisements. If the news bulletins, current affairs programmes, religious programmes and children's programmes are longer than 30 minutes of duration, they may be interrupted by advertising spots once in every 20 minutes after the first complete scheduled period of thirty minutes.

The sports events that are broadcasted live and the broadcasts of religious services shall not be interrupted by advertisements during the broadcast of the programmes

Impact on commercial practices

The number of breaks per hour is low in Turkey.

Especially on public channels where there are in average 0,6 breaks per hour in all day and 0,9 breaks per hour in prime time. The duration of the breaks is not very long, so the total volume of advertising on public channels is low.

On private channels the frequency of breaks is also low compared to the European average: 1,1 break per hour in all day and 1,3 break per hour during prime time. However, this is largely compensated by the duration of the breaks which are very long (338 seconds during all day and 406 seconds during prime time).

The categories of programmes that contain the highest percentage of advertising are series and soaps and also sports programmes. Advertising investment is also important in entertainment programmes and film and tv film.

There is a clearly lower percentage of advertising in children's programmes, information programmes and documentary.

Average number of interruptions per hour during and between the programmes

The following average number of blocks per hour is calculated taking into account to the real number of hours broadcast, excepted during Prime Time. (Theoretical - Please, refer to Chapter II of the economical report of the concerned country).

Please, note that the data of table 7 and table 18 are calculated on a different panel of channels. For the net proportion of the advertising broadcast volume, please refer to table 18A.

<u>TAB 7A - All Channels</u>	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Duration of the interruptions All Day (#sec)	246	129	165	199	-	188	185	136	143	236	185
Number of interruptions per hour All Day	1,0	1,4	1,5	1,8	-	1,8	1,6	3,4	1,8	1,8	1,9
Duration of the interruptions Prime Time** (#sec)	-	183	174	212	-	205	225	132	163	261	198
Number of interruptions per hour Prime Time **	-	1,9	2,4	1,4	-	2,1	2,2	3,1	3,1	1,5	2,1

* weighted average (cf. introduction)

** Theoretical dayparts

TAB 7B - All Channels	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Duration of the interruptions All Day (#sec)	132	167	120	83	315	-	105	141	185
Number of interruptions per hour All Day	1,0	1,3	1,8	1,9	1,0	-	5,3	5,5	1,9
Duration of the interruptions Prime Time** (#sec)	162	174	129	98	378	-	125	147	198
Number of interruptions per hour Prime Time **	1,9	1,5	2,4	3,0	1,2	-	6,4	5	2,1

* weighted average (cf. introduction)

** Theoretical dayparts

TAB 7C - Public channels	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Duration of the interruptions All Day (#sec)	173	90	140	126	-	157	221	129	0	0	140
Number of interruptions per hour All Day	0,5	1,1	1,3	0,3	-	0,9	1,2	3,7	0	0	1,1
Duration of the interruptions Prime Time** (#sec)	-	133	157	0	-	168	278	127	0	0	159
Number of interruptions per hour Prime Time **	-	1,3	2,2	0	-	1,7	1,3	2,7	0	0	2,0

* weighted average (cf. introduction)

** Theoretical dayparts

TAB 7D - Public channels	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Duration of the interruptions All Day (#sec)	72	105	100	71	143	-	-	-	140
Number of interruptions per hour All Day	0,4	1,0	1,8	1,9	0,6	-	-	-	1,1
Duration of the interruptions Prime Time** (#sec)	93	101	132	91	193	-	-	-	159
Number of interruptions per hour Prime Time **	1,9	1,2	2,5	2,8	0,9	-	-	-	2,0

* weighted average (cf. introduction)

** Theoretical dayparts

TAB 7E - Private Channels	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Duration of the interruptions All Day (#sec)	257	146	202	201	-	197	180	147	143	236	195
Number of interruptions per hour All Day	1,2	2,0	1,7	2,0	-	2,4	1,7	4,2	2,4	1,9	2,2
Duration of the interruptions Prime Time** (#sec)	-	207	207	212	-	224	218	145	163	261	210
Number of interruptions per hour Prime Time **	-	2,5	3,3	1,6	-	2,5	2,4	4,0	3,9	1,5	2,5

* weighted average (cf. introduction)

** Theoretical dayparts

TAB 7F - Private Channels	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Duration of the interruptions All Day (#sec)	150	238	128	85	338	-	105	141	195
Number of interruptions per hour All Day	1,6	1,8	2,0	1,8	1,1	-	5,3	5,5	2,2
Duration of the interruptions Prime Time** (#sec)	215	293	132	99	406	-	125	147	210
Number of interruptions per hour Prime Time **	1,9	1,7	2,6	3,0	1,3	-	6,4	4,7	2,5

* weighted average (cf. introduction)

** Theoretical dayparts

Proportion of broadcasting volume and advertising investment by type of programmes

Children's programmes - All Day 2003

TAB 10A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	10,3%	6,0%	9,3%	4,9%	-	6,8%	14,6%	-	3,0%	7,7%	7,5%
Part in the global advertising investment	-	2,0%	-	-	-	3,3%	3,8%	-	-	8,8%	-

TAB 10B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	2,1%	9,0%	15,5%	7,0%	5,1%	-	3,2%	7,8%	7,5%
Part in the global advertising investment	0,1%	-	2,3%	0,7%	2,0%	-	-	2,7%	-

Documentary - All Day 2003

TAB 11A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	0,6%	3,3%	11,6%	11,6%	-	4,6%	2,6%	-	12,8%	15,9%	9,8%
Part in the global advertising investment	-	0,6%	-	-	-	2,9%	1,6%	-	-	18,1%	-

TAB 11B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	4,9%	1,4%	10,0%	8,7%	3,1%	-	3,6%	3,6%	9,8%
Part in the global advertising investment	0,9%	-	3,1%	1,4%	2,3%	-	-	4,4%	-

Entertainment and Music - All Day 2003

TAB 12A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	5,5%	11,1%	15,1%	10,8%	-	13,2%	22,5%	-	32,2%	7,5%	12,5%
Part in the global advertising investment	-	14,7%	-	-	-	33,7%	30,3%	-	-	8,5%	-

TAB 12B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	16,4%	13,3%	12,0%	32,0%	15,0%	-	20,6%	16,9%	12,5%
Part in the global advertising investment	21,8%	-	18,7%	26,9%	16,3%	-	-	18,7%	-

Film, TV Films and Mini Series - All Day 2003

TAB 13A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	22,2%	17,7%	10,2%	11,9%	-	16,1%	4,3%	-	8,3%	13,0%	12,9%
Part in the global advertising investment	-	28,2%	-	-	-	17,4%	10,6%	-	-	14,9%	-

TAB 13B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	18,8%	17,9%	17,9%	7,1%	14,0%	-	2,8%	3,7%	12,9%
Part in the global advertising investment	30,7%	-	20,8%	23,3%	14,1%	-	-	3,8%	-

Information (News, Flash and Info Magazines) - All Day 2003

TAB 14A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	2,6%	12,4%	11,3%	6,8%	-	23,1%	9,4%	-	1,9%	13,4%	12,8%
Part in the global advertising investment	-	11,7%	-	-	-	18,3%	8,7%	-	-	15,2%	-

TAB 14B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	10,7%	7,6%	5,9%	8,2%	22,3%	-	10,6%	14,4%	12,8%
Part in the global advertising investment	6,1%	-	24,7%	17,7%	13,1%	-	-	8,0%	-

Political, Religious, Philosophical, Unions programmes - All Day 2003

TAB 15A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	2,0%	1,4%	0,8%	0,5%	-	2,4%	3,2%	-	0,0%	0,0%	1,1%
Part in the global advertising investment	-	0,1%	-	-	-	0,6%	0,7%	-	-	0,1%	-

TAB 15B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	0,3%	4,7%	2,3%	0,3%	3,6%	-	0,4%	0,0%	1,1%
Part in the global advertising investment	0,0%	-	0,9%	0,1%	2,2%	-	-	0,0%	-

Series and Soap - All Day 2003

TAB 16A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	9,8%	18,7%	11,6%	11,5%	-	14,1%	8,0%	-	13,9%	5,1%	11,3%
Part in the global advertising investment	-	16,1%	-	-	-	15,4%	22,5%	-	-	5,8%	-

TAB 16B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	20,6%	5,2%	13,5%	11,8%	11,6%	-	9,4%	22,4%	11,3%
Part in the global advertising investment	26,0%	-	25,9%	15,4%	23,9%	-	-	37,5%	-

Sports - All Day 2003

TAB 17A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	1,9%	5,1%	3,1%	8,6%	-	3,5%	2,7%	-	8,4%	7,5%	5,6%
Part in the global advertising investment	-	2,3%	-	-	-	5,9%	7,1%	-	-	8,6%	-

TAB 17B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
Proportion of broadcasting volume vs total broadcasting	4,7%	11,3%	7,9%	3,3%	1,6%	-	5,9%	9,4%	5,6%
Part in the global advertising investment	5,7%	-	2,1%	3,9%	3,3%	-	-	22,5%	-

* * * *

III. QUANTITATIVE RESTRICTIONS (Art. 18 of the Directive)

1. Quantitative restrictions on advertising and teleshopping spots

The duration of advertising shall not exceed 15 percent of the daily transmission time. However, this percentage may be increased to 20 percent to include forms of advertisements such as direct offers to the public for sale, purchase or rental of products or for the provision of services, provided the amount of spot advertising does not exceed 15 percent.

The daily transmission time allocated to direct sales may not exceed a total of one hour a day.

The amount of spot advertising within a given one-hour period shall not exceed 20%. However, the time devoted to the advertising spots within a given clock hour shall not exceed 6 (six) minutes in children's programmes.

It must also be reminded that, as already mentioned above, the advertising spots inserted between two programmes cannot exceed 8 minutes. In case of insertion of any advertising during the transmission of a programme, the advertising time cannot exceed 5 minutes."

Finally it is mentioned that broadcasters can also allocate 15 % of the teletext broadcasts to advertisements.

In relation to the calculation of maximum quota, Turkish regulation provides that social service advertisements and public service spots are not included in the calculation of the total maximum quota. However, under certain circumstances the showing of brands or products during a quiz or Tv game will be included in the advertising time.

There are also financial restrictions imposed on the TV advertising sector in Turkey: the RTÜK share, a special fee, which is retained from the total gross advertising revenue and must be paid to RTÜK. The RTÜK share is mainly aimed at financing RTÜK itself. The commercial television broadcasters have to pay each month 5 % of their gross advertising revenues to RTÜK. Moreover, an additional 5% per month has to be contributed to the Education Contribution Fund. Furthermore, pursuant to specific tax regulation, 0,5 % of the gross advertising revenue has to be paid as special process tax. All in all, the total extra financial burden on the TV advertising sums up to 10,5%.

Impact on commercial practices

During "all day" the major Turkish private channels remain below the maximum available advertising minutes (ATV: 7,6 min per hour, Kanal D: 9,3 min/hour; Show tv: 8,6 min /hour; TGRT: 8,7 min/hour). It is remarkable that the public channels broadcast much less advertising: TRT1: 3min/hour. In an average day, Kanal D reaches 15,5% of advertising, Show TV: 14,4% and TGRT 14,6%. The public channel TRT1 only contains 5% of advertising.

During prime the advertising volume is significantly higher on private channels: Kanal D: 12,1 min/hour, Kanal 7: 14,2 min/hour and STV: 13,8 min/hour. The public channels have even less advertising during prime time than during all day: TRT: 1,1 min/hour.

Total advertising proportion in the total broadcast time is 6,3% which is below the European average. Such is probably due to the presence of the public broadcasters which contain few advertising.

**Advertising time, Sponsoring time and Self-Promotion time proportions
vs Total broadcasting time**

TAB18A	Austria	Belgium N/S	France	Germany (2)	Ireland	Italy	Netherlands	Spain (1)	Sweden	United Kingdom	European Union Countries*(2)
Total Advertising time (out of sponsoring and self-promotion)	7,2%	4,5%	6,6%	6,2%	11,5%	9,2%	8,6%	6,8%	9,4%	12,3%	8,0%
Total Sponsoring time	-	0,2%	0,6%	2,1%	-	0,8%	-	0,4%	1,1%	-	1,1%
Self- promotion time	0,1%	3,1%	2,9%	0,1%	-	0,1%	3,5%	-	0,8%	0,0%	1,0%

(1) In some countries, total sponsoring proportion is estimated and could contain house style's logos of advertising breaks.

(2) Germany : the percentage of sponsoring includes infomercials, humanitarian and public interest campaigns (broadcast free of charge or against important discount).

30% of the sponsoring time is equal to the standard definition of the sponsoring (billboards); therefore the estimate of the net volume of sponsorship in Germany would generate an EU average of 0,6%

* weighted average (cf. introduction)

TAB18B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*(2)
Total Advertising time (out of sponsoring and self-promotion)	3,6%	6,1%	6,0%	4,3%	6,3%	-	11,7%	17,4%	8,0%
Total Sponsoring time	0,2%	-	0,1%	0,4%	0,2%	-	5,0%	3,4%	1,1%
Self- promotion time	0,1%	9,2%	5,8%	5,0%	5,0%	-	0,0%	3,4%	1,0%

2. Quantitative restrictions on teleshopping programmes

There are no specific rules in relation to teleshopping windows, except the quantitative restrictions mentioned above in relation to direct sales.

Impact on commercial practices:

From the economic report it appears that teleshopping (spots and ad formats excluded) represents 1,3% in the total programme mix. Such is slightly below the European average.

Proportion of teleshopping programmes vs Total broadcasting

TAB 19 A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
% in total broadcasting time	3,9%	5,0%	1,1%	3,5%	-	0,8%	11,6%	1,3%	0,0%	0,0%	1,9%

* weighted average (cf. introduction)

TAB 19 B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*
% in total broadcasting time	6,2%	3,3%	2,2%	1,1%	1,3%	-	1,6%	0,6%	1,9%

* * * *

IV. SPONSORSHIP (Art. 17 of the Directive)

Turkish regulation contains similar rules to the Directive in relation to editorial independence of the broadcaster and identification of the sponsor.

As foreseen in the Directive, reference to the products/services of the sponsor in the sponsored programme is forbidden.

The sponsoring message can have a maximum duration of 5 seconds at the end of the programme.

Manufacturers of products/services for which advertising is prohibited, are also excluded from sponsoring (for example alcohol, weapons, gambling, ...).

Sponsorship of news, current affairs and religious programmes is not allowed. However, the weather forecasts, sports programmes, and the highway reports may be sponsored and they must be presented outside of and be clearly separated from the news, current affairs and religious programmes and the products and services belonging to sponsors or third parties shall not be inserted.

Product placement is not defined as a form of sponsoring and is considered by the media authority as forbidden surreptitious advertising.

Impact on commercial practices

Sponsoring “billboard” / short spots, breakbumpers, sponsored self promotion spots, bartering, infomercials, scoreboards, injections and pop ups and chronowatches are existing formats in Turkey.

Sponsorship represents 3% of total advertising and sponsoring broadcasting time which is far below the European average. Also in terms of investment, sponsoring seems even less important.

**Proportion of sponsorship broadcasting time and
Part of investment relating to sponsorship
vs Total advertising and Sponsoring**

TAB 20	Austria	Belgium N/S	France	Germany (1)	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries* (1)
% of sponsorship broadcasting time	-	3,6%	8,7%	25,2%	-	8,3%	-	3,8%	10,4%	-	12,6%
% of sponsorship investment vs Total	-	6,9%	12,2%	6,9%	-	11,7%	-	5,3%	-	-	9,0%

(1) Germany: in this percentage are also included infomercials and humanitarian and public interest campaigns broadcast free of charge or against important discount.

30% of the sponsoring time is equal to the standard definition of the sponsoring (billboards); therefore the estimate of the net volume of sponsorship in Germany would generate an EU average of 7,3%

* weighted average (cf. introduction)

TAB 21	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	European Union Countries*(1)
% of sponsorship broadcasting time	5,2%	-	1,4%	9,2%	3,0%	-	29,9%	16,0%	12,6%
% of sponsorship investment vs Total	1,9%	-	3,6%	3,8%	1,4%	-	7,6%	17,3%	9,0%

* weighted average (cf. introduction)

* * * *

V. NEW ADVERTISING TECHNIQUES

Turkish regulation contains a legal definition of split screen advertising: splitting the screen into more than one geometric shape with the aim of viewing different contents simultaneously. Such definition does not precise neither the conditions of use of such advertising technique, the specific rules related to insertion, nor the volume of it. However, in Turkey the split screen advertising must be clearly identified as advertising and is also included in the maximum quota for advertising.

Interactive advertising has not been defined in Turkish Law. Neither the conditions of this considerably new technique, nor the specific rules and prohibitions related thereto exists in the Turkish legislation.

Virtual advertising is defined in Turkish regulation as: the placement of advertisement not associated with the real environment onto the image on the screen through utilization of electronic visual systems that alter the transmission signals.

Virtual advertising is allowed under certain conditions:

The Broadcaster must inform, in writing or verbally, the television viewers at the beginning and/or the end of the broadcast that a virtual advertisement has been or will be used during the broadcast.

Each channel that includes a virtual advertisement in its broadcasts, should inform other channels thereof.

Virtual advertisements may not be placed into the transmission signal without the consent of the broadcaster(s) holding the transmission right, or the organizer or third parties. In addition:

- a) the virtual advertising may not harm the quality of the programme.
- b) audio effects should not be used.
- c) virtual advertising may only replace existing on site advertising and must observe the applicable rules concerning the content of advertising
- d) virtual advertising may be placed onto the persons appearing in the screen.
- e) virtual advertisement cannot draw more attention than the advertisements appearing on the site.
- f) virtual advertising cannot be placed into the news bulletins, news programmes, current affairs programmes, children's programmes or religious programmes.

The Broadcasters may not waive their liabilities related to the virtual advertisement content or assign it by any agreement.

In practice, the virtual advertisings are mainly placed during the football games. It is obvious that had this specific regulation permitting the virtual advertisements not existed, this technique would be evaluated as a form of surreptitious advertising.

Impact on commercial practices

Virtual advertising and split screen techniques are used in Turkey.

Split screen advertising is also measured as a separate format for audience and investment. It seems that the technique is only of minor importance when compared to traditional spot advertising: ATV: 0,3 min/hour; Kanal 7: 0,5 min/hour; show TV, TGRT, STV: 0,7 min/hour

TAB 22A	Austria	Belgium N/S	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	UK
Used or not	Y	N	N	Y	N	N	Y	Y	Y	Y
Measured	N	-	-	Y	-	-	N	*	N	N

* Measured as Advertising Spots

TAB 22B	Czech Rep.	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA
Used or not	Y	Y	N	N	Y	Y	N	N
Measured	*	N	-	-	Y	N	-	-

* Measured as Advertising Spots

TAB 23	Nbr of insertions of every advertising category by channel in a year		Gross adv. Spendings per category in (000) Euros		Total broadcast minutes for every advertising category by channel in a year (nbr of min)		Avg broadcast minutes for every advertising category by channel in an hour (nbr of min)		Proportion time of Total in %		Proportion time vs Total programmes broadcast (%) in an average day	
	2002	2003	2002	2003	2002	2003	2002	2003	2002	2003	2002	2003
All Day												
Total Germany	2.597.616	2.537.652	7.248.813,06	7.428.737,82	956.547	960.938	4,7	5,0	100,0%	100,0%	7,4%	7,4%
Tot. Adv. Germany	2.507.484	2.207.665	7.074.521,26	6.914.272,95	783.332	719.065	3,9	3,7	81,9%	74,8%		
Splitscreen Germany	15.691	21.513	102.431,36	166.221,68	4.416	5.935	0,0	0,0	0,5%	0,6%		
Total Turkey	1.656.826	2.067.270	5.647.525,60	6.472.369,11	696.661	846.605	4,2	3,9	100,0%	100,0%	10,0%	11,1%
Tot. Adv. Turkey	1.656.826	2.053.760	5.647.525,60	6.384.556,32	696.661	821.357	4,2	3,8	100,0%	97,0%		
Splitscreen Turkey	240.576	327.325	439.978,04	579.587,28	33.143	45.177	0,2	0,2	4,8%	5,3%		
Prime Time												
Total Germany	366.964	372.109	3.405.135,12	3.270.189,57	130.215	127.474	5,0	5,1	100,0%	100,0%	8,0%	8,6%
Tot. Adv. Germany	353.937	341.404	3.336.989,55	3.063.915,83	128.236	119.575	4,9	4,7	98,5%	93,8%		
Splitscreen Germany	2.133	4.478	40.999,08	80.935,67	529	1.220	0,0	0,0	0,4%	1,0%		
Total Turkey	576.150	731.103	3.344.156,61	3.836.440,45	233.118	282.799	6,7	6,2	100,0%	100,0%	12,6%	15,0%
Tot. Adv. Turkey	576.150	728.602	3.344.156,61	3.821.043,65	233.118	280.480	6,7	6,1	100,0%	99,2%		
Splitscreen Turkey	83.585	128.431	179.313,09	373.103,51	11.443	17.452	0,3	0,4	4,9%	6,2%		

Total = Adv. + Sponsoring

Splitscreen is included in Tot. Adv.

* * * *

**VI. GENERAL PRINCIPLES ON ADVERTISING AND
TELESHOPPING CONTENT**
(Article 12 of the Directive)

The Turkish regulation contains provisions as the ones stated in article 12 TVWF Directive. However, it should be noticed that the Turkish Regulation also contains more detailed provisions regarding the content of the advertising i.e. on the decency, honesty and truthfulness, advertisements promoting sales, direct sales and comparative advertisements, advertisements based on testimonials, burden of proof, denigration, imitation, and public health, all in line with the advertising codes of the International Chamber of Commerce.

Impact on commercial practices

It can be presumed that these rules and self-regulation have a positive economic impact and encourage consumer confidence in advertising.

* * * *

VII. SPECIFIC PRODUCTS AND TARGETS
(Articles 13, 14, 15 and 16 of the Directive)

In Turkey, any advertisement or promotion of cigarettes and other tobacco products whatsoever with indication of their names, trademarks and symbols, or the organization of inducing or encouraging campaigns with a view to stimulate the utilization such products is prohibited.

The rules in relation to advertising of medicines are in line with the Directive (prohibition to advertise medicines available on prescription only).

Concerning alcoholic beverages there is a legal ban on tv advertising, teleshopping and sponsoring in Turkey.

In relation to minors, the Turkish regulation includes the rules provided in art.16 of the Directive, but also mentions far more precise rules. These rules in particular concern misleading and deceptive advertising, inducement to execute contracts for the sale or lease of goods and services, appearance of children playing with or using hazardous tools and objects likely to harm them or their surroundings, exploitation of parents' feelings of love, tenderness and devotion, prohibition of advertising likely to harm the health of minors.

Also there is a specific quantitative restriction in relation to children's programmes, which may contain maximum 6 minutes of advertising per hour.

The Turkish regulation also provides advertising restrictions in relation to some other categories of products or services: infant food products-formulas, cosmetic products, food products, lawyers, opticians, doctors and dentists, accountants, pharmacists, weapons or of weapon manufacturers and retailers, fortune-tellers, mediums, astrologists, gambling entities and other similar places, matchmaking services and escort agencies, private health institutions, health-related information and institutes for Beauty and Aesthetics.

Impact on commercial practices

In terms of broadcast advertising minutes, amongst the measured categories, the important category is "food", followed by "Cosmetics/personal Hygiene" and "Cleaning products" (see tab 13, p74-79).

In terms of gross advertising spendings the important categories are the same.

Alcohol is not advertised at all because of the legal ban and advertising for products dedicated to children is also lower than other measured categories. It is remarkable that there is no advertising for non prescription medicines since the Turkish regulation does allow this type of advertising.

It has to be reminded that the figures in the economic report do not include some important advertisers, such as telecom, cars and financial services.

* * * *

VIII. GENERAL OBSERVATIONS

In Turkey TV advertising represents 74,7% of the total gross media investments which indicates that television is a very attractive medium for advertisers. In net terms TV has a share around 50%.

Digital television penetration is already relatively high in Turkey (approx. 800.000 subscribers) and expected to grow further. Of the initial 3 digital platforms 1 survived (Digiturk).

TAB 24A	Austria	Belgium MS	France	Germany	Ireland	Italy	Netherlands	Spain	Sweden	United Kingdom	European Union Countries*
Total Media Investments (000 €)	2.160.947	2.137.479	15.900.000	17.157.223	537.000	25.600.000	4.044.066	12.079.033	1.611.087	11.986.590	106.902.530
Total TV Invest. (000 €)	463.085	945.281	6.070.563	7.443.792	207.716	9.140.000	2.066.192	6.773.889	382.283	5.237.400	37.370.852
Average part of TV Invest.*	21,4%	44,2%	38,2%	43,4%	38,7%	35,7%	51,1%	56,1%	23,7%	43,7%	35,0%
Average part of Top 5 TV vs Total TV Invest.*	85,8%	94,7% N 97,0% S	91,9%	78,8%	98,9%	74,4%	70,1%	82,6%	100,0%	81,3%	84,4%
Average Top 5 Audience Share*	62,4%	65,6% N 43,4% S	85,3%	40,2%	56,7%	79,4%	52,1%	79,5%	46,4%	35,2%	60,5%
Adults population universes	6.505.800	8.256.000	45.660.000	63.036.553	3.010.000	49.540.000	13.308.000	34.588.000	7.235.000	46.663.000	277.802.353
GDP (mo €)	226.142	267.480	1.557.245	2.128.200	134.786	1.300.926	454.276	743.046	267.297	1.589.468	8.668.867
Average Total Media Invest. / GDP*	0,96%	0,80%	1,02%	0,81%	0,40%	1,97%	0,89%	1,63%	0,60%	0,75%	1,23%
Average Total TV Invest. / GDP*	0,20%	0,35%	0,39%	0,35%	0,15%	0,70%	0,45%	0,91%	0,14%	0,33%	0,43%
Average Adv. Invest. / inhab.	332,2	258,9	348,2	272,2	178,4	516,8	303,9	349,2	222,7	256,5	384,8
Average TV Adv. Invest. / inhab.* (€ per year)	71,2	114,5	133,0	118,1	69,0	184,5	155,3	195,8	52,8	114,7	134,5

TAB 24B	Czech Republic	Hungary	Poland	Romania	Turkey	Canada E/F	Japan	USA	Applicant countries	Countries Outside EU	All Countries Observed
Total Media Investments (000 €)	1.056.282	1.460.785	2.416.794	1.358.000	8.666.904	4.273.026	42.573.909	107.030.038	14.958.765	153.876.973	275.738.268
Total TV Invest. (000 €)	508.937	956.867	1.437.035	1.143.817	6.472.230	1.783.930	14.590.520	72.045.904	10.518.887	88.420.354	136.310.092
Average part of TV Invest.*	48,2%	65,5%	59,5%	84,2%	74,7%	41,7%	34,3%	67,3%	70,3%	57,5%	49,4%
Average part of Top 5 TV vs Total TV Invest.*	99,8%	100,0%	94,6%	92,8%	73,9%	79,0%	56,8%	25,3%	82,5%	31,6%	50,0%
Average Top 5 Audience Share*	93,6%	80,5%	79,5%	69,7%	59,2%	40,8% English	77,5%	41,4%	72,1%	50,8%	57,7%
Adults population universes	8.453.632	7.799.734	30.514.000	16.222.000	33.848.233	24.268.903	84.801.171	211.400.000	96.837.599	320.470.074	695.110.026
GDP (mo €)	80.097	73.213	185.176	50.352	212.268	768.969	3.800.189	9.727.723	601.106	14.296.881	23.566.853
Average Total Media Invest. / GDP*	1,32%	2,00%	1,31%	2,70%	4,08%	0,56%	1,12%	1,10%	2,49%	1,08%	1,17%
Average Total TV Invest. / GDP*	0,64%	1,31%	0,78%	2,27%	3,05%	0,23%	0,38%	0,74%	1,75%	0,62%	0,58%
Average Adv. Invest. / inhab.	125,0	187,3	79,2	83,7	256,1	176,1	502,0	506,3	154,5	480,2	396,7
Average TV Adv. Invest. / inhab.* (€ per year)	60,2	122,7	47,1	70,5	191,2	73,5	172,1	340,8	108,6	275,9	196,1

* weighted average (cf. introduction)

Brussels, June 2005.