

**Fastweb response to the DG INFSO consultation on “Television without Frontiers”**  
**Directive review process**

**4- Commercial Communications**

Consistently with the two-tier approach supported under Issues Paper 1, Fastweb is of the opinion that all providers of audiovisual content services should be subject to qualitative obligations related to commercial communications. Fastweb supports the view that the relevant obligations (such as those concerning non-discrimination, identification of commercial communications, public health, protection of minors, etc.) should be applied to commercial communications in both linear and non-linear services, without prejudice to the possibility of adjusting these to the particularities of each type of medium.

On the other hand, Fastweb agrees with the view expressed by the experts consulted by the Commission that the application of quantitative rules (hourly and daily limits; insertion of advertising) to non-linear services would make little sense. In fact, by their very nature, non-linear services – and on-demand services in particular - allow the users / viewers to choose and control content at any time. In the light of the above, Fastweb shares the experts’ view that there is no need for quantitative limits in the non-linear services.