



British Broadcasting Corporation

Review of premium rate telephony services programming

Report for BBC Management 14th September 2007

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1 Use of our report and legal responsibility

The matters discussed in this report are by their nature technical. The intended recipient of the report, BBC Management (“the BBC”), is familiar with the issues, facts and other matters addressed and the report was written with that in mind.

This report was prepared for the sole and confidential use of the BBC at the request of the BBC Trust (“the Trust”) and for the purposes set out in our letter of engagement dated 14 August 2007. Our work was undertaken so that we might state to the BBC those matters identified in our report and for no other purpose.

The Trust may ask for our consent to making this report publicly available by posting it on their website. We will agree to provide such consent on the following conditions:

- In preparing this report our only responsibility and duty of care was to the BBC. This report will not be suitable for the use of any person other than the BBC. Accordingly, publication of this report to persons other than the BBC is for information purposes only and no person other than the BBC should place any reliance on this report.
- We do not assume, accept or owe any responsibility or duty of care to any person other than the BBC. Accordingly, any person other than the BBC who, contrary to the above, chooses to rely on this report does so at their own risk and we will not be responsible for any losses of any such person caused by their reliance on this report.

We emphasise that the work focuses on the Premium Rate Telephony Services (“PRTS”) elements evaluated for a sample of six programmes only. This report does not express an overall opinion based on the procedures we have performed, including any overall opinion on the effectiveness of the controls identified. Nothing in our work guarantees that errors or irregularities will not occur, nor is our work designed to detect all such errors or irregularities should they have occurred, including revealing fraud or misrepresentation by management, the BBC or third party production companies and telecom service providers. We have no responsibility to update this report after completion of our services.

Further details covering the scope and limitations of our report are set out on pages 2 and 3 below.

2 Acceptance

BBC Management has read and understood the contents of this Report. They accept the accuracy of the report findings to the best of their knowledge and understanding.

Jana Bennett, Director BBC Vision

David Jordan, Controller Editorial Policy

3 Introduction, scope and limitations

3.1 Introduction and scope of our review

During March 2007 the BBC conducted an internal review of PRTS interactivity. This review was conducted across all BBC departments for the BBC Director General in response to various incidents within the BBC which identified potential concerns with the way in which PRTS were being used in programming. The BBC Director General reported the results at a meeting with the BBC Trust in May 2007. The report "Premium Rate Telephony and Associated Issues – Final Report from the BBC Director General to the BBC Trust, May 2007" was published by the Trust on 29 May 2007.

The minutes of the meeting between the BBC Director General and the Trust included the following statement:

"The Trust noted the outcomes of the internal review of the BBC's use of premium rate telephone services, which had not uncovered any further issues of substance. On the request of the Trust, the Director-General agreed to commission an external auditor to undertake a sample-check of a number of programmes that had been looked at as part of the internal review. It was agreed that this would reflect best practice and would provide additional confidence in the review's outcomes."

This report was commissioned by the Director, BBC Vision and the Controller, Editorial Policy ("the BBC") at the request of the Trust and has been prepared in accordance with our engagement letter dated 14 August 2007.

3.2 Our reliance on information and representations

In preparing this report, we have relied on information obtained through interviews, and where available, information and data provided to us by the BBC and third parties.

In both cases, we have relied upon such information and representations as stated as being true, correct and complete and have not audited, tested or verified the information given to us in the course of our services.

3.3 Limitations of our review

The scope of our work specifically did not include:

- Any other programmes outside the sample selected;
- The controls operated by any external telephony network that the BBC, or any of the telecom service providers we visited, rely on to route call or SMS traffic;
- The controls operated by any aggregator that is used to aggregate SMS messages from those external telephony networks before transmission to one of the telecom service providers we visited for the BBC;
- An assessment of the integrity of applications used to “randomly” select a winner or contestant to present truly random results;
- An assessment of the controls operated by the network service provider used by Local Radio 1, Entertainment 1, Sport 1 and Daytime 1.

BBC Editorial Policy Guidelines and the Ofcom, and ICSTIS codes do not explicitly require broadcasters or third parties to create or retain documentary evidence. A significant portion of the work we have performed was based on inquiry only; we were not able to corroborate some representations made by those interviewed due to the lack of documentation produced and retained.

Due to time constraints we have been unable to complete all of our procedures as at the date of this report. Dialogue is ongoing with the BBC with respect to those matters outstanding.

4 Background

The Independent Committee for the Supervision of Standards of the Telephone Information Services (“ICSTIS”) is the industry-funded regulatory body for all premium rate charged telecommunications services. ICSTIS define PRTS as offering “some form of information or entertainment that is charged to your phone bill. Premium rate calls are the most expensive and will cost between 10p and £1.50 from a BT landline (charges from other networks may vary). Premium rate numbers begin with 090 or 091 or use mobile short codes that are 4, 5 or 6 digits long.” (Source: ICSTIS Website http://www.icstis.org.uk/consumers/useful_terms.asp#P).

The BBC use PRTS as a way of allowing viewers and listeners to interact with the BBC. The BBC does not seek to generate profit from the PRTS it uses in its programming, except when raising donations for charity. The tariffs used vary depending on the purpose of the programme: calls are priced at the lowest tariff necessary so as to cover costs and the fee charged by the phone operator, or priced to raise money for Charity partners. PRTS is also used by Children’s BBC to minimise call charges to children (for example 10 pence from BT landlines).

For the purpose of this report the BBC have defined PRTS as any interaction where the cost of that interaction is greater than the standard rate with the exception of Children’s where the call cost is capped at 10 pence from a BT landline. The BBC state in Section 15: “Interacting with our audiences”, of their Editorial Policy that they must comply with the ICSTIS code where applicable. Some sections of the ICSTIS code do not apply to certain programmes included in the scope of this review due to the cost of the interaction falling below 50 pence threshold for pricing information requirements (see ICSTIS Code Section 5.7.5) and below the £2 threshold for audible notifications (see ICSTIS Code Section 5.7.4).

4.1 Objective of the review

The objective of the review was to assess the results of the BBC internal review through employing the following scope of work defined by the BBC:

- Select a representative sample of programmes from those listed within the Internal Review Report and use industry best practice methods to test whether the interactivity via Premium Rate Telephony within each programme complied with BBC Editorial Guidelines, the Ofcom Broadcasting Code and other relevant regulators’ provisions (e.g., the ICSTIS Code).
- Should any results of the testing be inconsistent with the information contained within the Report, comment on the origin of those inconsistencies, considering in particular whether they relate to the scope and conduct of the Review.

4.2 Scope and Approach

The approach adopted to achieve these objectives was as follows:

- Develop and agree a risk and control framework for the purpose of this assessment. The content of this framework was drawn from three sources of risks and controls:
 - Those pertinent to PRTS at the time of the BBC review (BBC Editorial Guidelines, Section 15: Interacting with our audience; the Ofcom Broadcasting Code; and the ICSTIS Code of Practice – 11th Edition dated November 2006);
 - Those not required at the time of the BBC review but which were published during the latter stages of the BBC review (“Participation TV: restoring consumer trust and confidence” ICTIS letter to broadcasters dated 12 March 2007); and
 - Deloitte’s definition of good practice relating to PRTS.
- Select and agree with the BBC a sample of six programmes that had been included in the internal BBC review (see 4.3 Programmes included in the review).
- Assess the design and implementation of controls in place in the sample of programmes selected through interviews with relevant personnel and corroboration with evidence made available (see 3.3 Limitations of our review).
- Compare our findings in relation to the specific programmes tested with the BBC review’s findings.
- Identify the reasons for the differences between the two reports (if any).

4.3 Programmes included in the review

A sample of six programmes were selected and agreed with the BBC for testing. These six programmes were selected from the population of 98 programmes that made use of PRTS included in the BBC review. The sample was selected to be representative of the key risk areas being evaluated and the variety of programming types that we were informed use PRTS interactivity. These programming types were:

- A Children’s programme;
- A voting programme that received a high volume of telephone calls;
- A local radio programme that received a low volume of calls;
- An independent production and an in-house production;
- A charity programme.

The six programmes tested were:

	Type of Programme					Production Company		Entry Method		Service Provider			Form of Interaction		Charity	High Volume**
	Children	Daytime	Entertainment	Sport/Drama	Local Radio*	In-House	Independent	IVR	SMS	SP1	SP2	SP3	Vote	Competition		
Children’s 1	✓						✓	✓			✓			✓		
Entertainment 1			✓			✓		✓		✓			✓		✓	✓
Entertainment 2			✓				✓	✓	✓			✓	✓	✓	✓	✓
Daytime 1		✓					✓	✓		✓			✓	✓	✓	
Sport 1				✓		✓		✓	✓	✓			✓		✓	✓
Local Radio 1					✓	✓		✓		✓				✓	✓	

* The BBC has stated that all local radio programmes utilise PRTS only as part of nationwide pan-BBC charity campaigns and do not use PRTS for local interactivity

** The BBC has defined “high volume” as a programme which receives greater than 750,000 telephone calls

The sample contains both programmes which were reviewed in detail in the BBC internal review (e.g. Children’s 1) as well as programmes where no findings were reported (e.g. Daytime 1). Where the sample included programmes where findings had been previously reported in the BBC internal review a different transmission of that programme was selected for testing. Any programmes where further internal investigation has either been undertaken or was ongoing were excluded from the population for selection.

5 Findings

We present the findings from our review in three sections on the following pages.

Each of these sections groups together findings from the three sources of risks and controls as set out in 4.2 above. The sections group findings as follows:

- Findings based on control criteria pertinent to PRTS at the time of the BBC review. Namely:
 - BBC Editorial Guidelines, Section 15: Interacting with our audience;
 - The Ofcom Broadcasting Code; and
 - The ICSTIS Code of Practice – 11th Edition dated November 2006;
- Findings based on more recently published control criteria (“Participation TV: restoring consumer trust and confidence” ICSTIS letter to broadcasters dated 12 March 2007); and
- Findings based on Deloitte’s definition of good practice relating to PRTS.

Note that where a finding relates to more than one of the three groups as set out above, we have included the finding in the first of the categories that it is relevant to and have also included the other criteria against the point.

Also note that against each finding we have recorded actions that the BBC informs us have been taken or are being taken to address issues raised by their own Premium Rate Telephony and Associated Issues Report of May 2007. We have not validated these BBC actions as part of our Review.

5.1 Findings based on control criteria pertinent to PRTS at the time of the BBC review

5.1.1 Counting of SMS votes

Finding	Control criteria	Programme(s)
<p>For Entertainment 2 and Sport 1, a small percentage of SMS votes were received after the lines were closed but were not counted in the final results due to the inherent latency of SMS voting. It is not possible to identify how many of these votes were sent before the lines were closed, and therefore should have been included in the final vote.</p> <p>For Sport 1, it is noted that none of the votes received after the lines had closed were charged the premium rate.</p> <p>In both programmes, the production teams had recognised in advance of the broadcast that latency in delivery of high volumes of SMS messages could result in some votes arriving late and so sought to minimise this impact by removing the SMS voting details from the final call to action.</p> <p>It was noted that BBC best practice at the time was to specify at least fifteen minutes between final solicitation of SMS votes and the results announcement.</p> <p>However, in the case of Sport 1, due to over runs in the live show format which included over 100 inserts, films and live interviews, this last call to action was not used. The call to action that the production team had intended to be the penultimate one therefore became the final one. This included the SMS voting details and was broadcast approximately 8 minutes before the end of the vote.</p> <p>In the case of Entertainment 2, it was noted that the last call to action for SMS votes occurred 25 minutes prior to the vote being closed.</p> <p>In both cases the final outcome of all of the voting was not affected by SMS votes received late.</p>	<p><i>BBC Editorial Policy - Section 15:</i></p> <p><i>BBC should allow enough time in the period between closing the vote and announcing the result for the votes to arrive, be processed and checked.</i></p> <p><i>ICSTIS Letter Risk: Votes not counted in time for live announcements and assumptions are made in the absence of complete data.</i></p>	<ul style="list-style-type: none"> • Entertainment 2 • Sport 1

Recommendation

The BBC should consider the impact of the inherent limitations of SMS entry routes for large scale voting programmes or competitions where the results are required in a short timeframe.

BBC report

The BBC Report did not identify Sport 1 as a specific example.

However, we note that the BBC Report recognised this issue: Action 12 – To examine the use of text voting in popular programmes with high levels of interactivity.

As stated in the report, latency in text voting has been recognised as an industry issue and the BBC Telephony Working Group has commissioned research into all uses of mobile interaction. All SMS votes in programmes with high levels of interactivity are now referred to Finance and Business Affairs (F&BA) and Editorial Policy.

5.1.2 Pricing information displayed on-screen

Finding	Control criteria	Programme(s)
<p>In Entertainment 2 (where calls cost more than 50p) the on-screen message during the reprise section of the first show in the series did not advise viewers that cost of calls from other fixed line or mobile networks could vary. It was noted that other on-screen graphics elsewhere in the programme did contain this information.</p> <p>Furthermore, in the Entertainment 2 competition, it was difficult to read the pricing message containing the cost of the call, as the font size was small, and the information was on-screen for too short a period.</p> <p>It was noted that these findings related to the first show in the series and it was stated that on-screen graphics were amended for all subsequent programmes in the series.</p>	<p><i>ICSTIS Code Section 5.7.1: Service providers must ensure that all users of premium rate services are fully informed, clearly and straightforwardly, of the cost of using a service prior to incurring any charge.</i></p> <p><i>ICSTIS Help Note on pricing information Version 1: November 2006: [extract] ... While consumers may have a general awareness that calls from mobile phones and some landline networks may cost more than others, it is necessary to include information in the promotional material stating this fact.</i></p>	<ul style="list-style-type: none"> Entertainment 2
<p>Recommendation</p>		
<p>All programmes using PRTS should adhere to compulsory price message requirements. These requirements should detail the minimum level, format and frequency of the information to be provided both on screen and verbally where required.</p>		
<p>BBC report</p>		
<p>The BBC Report did not identify Entertainment 2 as a specific example.</p> <p>However, we note that the BBC Report recognised this issue: Action 2 and 7 – Interim policy referral system set-up and Senior Editorial figure identified for each production.</p> <p>All premium rate interactivity is to be referred and approved by a Senior Editorial figure or for Independents, the Commissioning Editor.</p> <p>A Senior Editorial figure in every production will be formally responsible for the compliance of PRTS.</p>		

5.1.3 Information displayed to viewers

Finding	Control criteria	Programme(s)
<p>In Entertainment 1, it was not possible to read all the information provided in the on-screen graphic (including the phone number and pricing information) displayed at the end of one contestant's individual performance. It was noted that the graphic appeared on-screen for one second less than for any of the other contestants.</p> <p>It was also noted that in Entertainment 1, the on-screen graphic for the individual's performance was displayed clearly on a further five separate occasions throughout the programme.</p> <p>In Entertainment 2, the on-screen graphic displayed during calls to action for two contestants incorrectly gave the same telephone number during the reprise section at the end of the BBC1 show and again at the beginning of the BBC3 show which followed. Production staff were informed of the error by a family member of the contestant.</p> <p>At the end of the BBC3 show, the error was corrected with a graphic with the correct number transposed over the original one. A verbal announcement was then made to alert viewers to the error.</p> <p>In a side competition to Entertainment 2, the competition telephone entry number displayed on screen and announced by the presenter was incorrect.</p>	<p><i>ICSTIS Code 7.6.7b: Service providers must ensure that:</i></p> <p><i>b) all correct entries have the same chances of winning.</i></p>	<ul style="list-style-type: none"> • Entertainment 1 • Entertainment 2
Recommendation		
<p>We recommend a senior member of the production team be assigned the responsibility for ensuring the compliance of each programme's PRTS interactivity with the relevant codes and control criteria. This should include ensuring that all information displayed to viewers is in line with requirements.</p> <p>Competition and vote lines should be tested before, during and after the period when viewers can interact to see that they are operating correctly and have been properly closed.</p>		

BBC report

Entertainment 1 had not transmitted at the time of the BBC Report. The BBC Report did not identify the Entertainment 2 incorrect contestant number as a specific example, however, it did identify that in the Entertainment 2 side competition the incorrect number was displayed and announced, and remedial action was taken.

However, we note that the BBC Report recognised this issue: Action 2 and 7 – Interim policy referral system set-up and Senior Editorial figure identified for each production.

All premium rate interactivity is to be referred and approved by a Senior Editorial figure or for Independents, the Commissioning Editor.

A Senior Editorial figure in every production will be formally responsible for the compliance of PRTS.

5.2 Findings based on more recently published control criteria

5.2.1 Completeness of contracts

Finding	Control criteria	Programme(s)
<p>Neither the BBC production department on Sport 1 nor the independent production company on Daytime 1 had a contract in place with the telecom service provider for the provision of PRTS for their respective programmes.</p> <p>We note that for Sport 1, since the show was broadcast, a formal contract is being developed.</p> <p>In the case of Entertainment 1, the BBC has a signed contract in place with this same telecom service provider for the provision of PRTS. The contract is not dated.</p>	<p><i>ICSTIS Letter Risk: Contractual and other responsibilities as separated between the broadcaster, production company, telecom service provider and potentially other partners, are not clear, nor are they governed by well-understood processes, procedures or protocols designed to minimise problems.</i></p>	<ul style="list-style-type: none"> • Entertainment 1 • Daytime 1 • Sport 1
<p>Recommendation</p>		
<p>We recommend that a review is performed of all current and planned programming using PRTS to ensure that formal agreements defining the contractual and other responsibilities of the various parties are in place.</p>		
<p>BBC report</p>		
<p>The BBC Report recognised this issue: Action 11 – Senior post in F&BA identified to scrutinise PRTS contracts.</p> <p>A senior post has been identified and put in place in F&BA and all contracts for telephony are being referred for approval. A specialist telephony consultant has also been employed to work with F&BA on the contractual requirements.</p>		

5.2.2 Potential risk of PRTS lines being circumvented to enter a competition

Finding	Control criteria	Programme(s)
<p>In Daytime 1, the premium rate (09) number used for the competition, works by routing calls to a series of non-premium direct dial identifier (DDI) lines. The DDI lines provided by the telecom service provider were unsecured. Anyone with knowledge of these unsecured DDI numbers could therefore have entered the competition at the cost of a standard rate call and avoid paying for the premium rate.</p> <p>We have not obtained any evidence that the unsecured DDI numbers were used to directly enter the competition. Both the telephone operator and the telecom service provider have systems in place to detect calls from the underlying DDIs which would indicate a pattern of potential rigging. The telecom service provider has stated that this did not happen.</p>	<p><i>ICSTIS Letter Risk: In competitions, processes do not exist to minimise the risk of rigging.</i></p>	<ul style="list-style-type: none"> Daytime 1
<p>Recommendation</p>		
<p>We recommend that secure telephone lines should be used for all calls made in relation to premium rate interactivity.</p>		
<p>BBC report</p>		
<p>The BBC Report recognised this issue: Action 11 and 13 – Identify post in F&BA to scrutinise contracts and review current measures for preventing vote rigging.</p> <p>The BBC now review all proposed technical systems and business arrangements for compliance with BBC policy and the BBC is working with the telephony service providers to look at future technical solutions.</p>		

5.3 Findings based on Deloitte’s definition of good practice relating to PRTS

5.3.1 On-screen voting and pricing information

Finding	Control criteria	Programme(s)
<p>In Sport 1, the on-screen messages did not advise viewers that cost of calls from other networks or mobiles could vary from the stated price.</p> <p>It was noted that as the cost of calls for Sport 1 were fixed at under 50p, the ICSTIS code relating to pricing information was not applicable.</p>	<p><i>Good practice control.</i></p>	<ul style="list-style-type: none"> Sport 1
<p>Recommendation</p>		
<p>Compulsory price message requirements should be set for which all programmes using PRTS must adhere to. These requirements should detail the minimum level, format and frequency of the information to be provided both on screen and verbally.</p>		
<p>BBC report</p>		
<p>The BBC Report recognised this issue: Action 2 and 7 – Interim policy referral system set-up and Senior Editorial figure identified for each production.</p> <p>All premium rate interactivity is to be referred and approved by a Senior Editorial figure or for Independents, the Commissioning Editor.</p> <p>A Senior Editorial figure in every production will be formally responsible for the compliance of PRTS.</p>		

5.3.2 PRTS documentation

Finding	Control criteria	Programme(s)
<p>The BBC Editorial Policy Guidelines and the Ofcom, and ICSTIS codes do not explicitly require broadcasters or third parties to retain documentation beyond 60 days to evidence their performance of control activities.</p> <p>As a consequence, we have not been able to see documentary evidence to corroborate some of the statements made to us during this review. Some specific examples include:</p> <p>The BBC, independent production companies and telecom service providers do not always retain documentary evidence in order to enable a reconciliation of the final voting figures as recorded by the telecom service provider against the number of votes recorded by the system platform.</p> <p>The rules for entering the competition on the Daytime 1 programme were not retained on the website. Therefore we cannot establish whether the process used for selecting the winner of the competition, which included the producers making certain checks and the potential winner needing to be available at a certain time to receive a follow up call, were made clear to entrants.</p>	<p><i>Good practice control</i></p>	<ul style="list-style-type: none"> All programmes
<p>Recommendation</p>		
<p>We recommend that the BBC, independent production companies and telecom service providers should produce and retain sufficient evidence of the operation of controls at key stages of the PRTS value chain, for example, the integrity of any winner selection process, voting processes, and testing performed.</p>		
<p>BBC report</p>		
<p>The BBC Report recognised this issue: Action 9 and 11 – Revised compliance forms and post identified in F&BA to scrutinise contracts.</p> <p>Updated compliance forms are to be produced which will require every live and pre-recorded programme which plans to use PRTS to complete certain documentation in advance of transmission.</p>		

A senior post has been identified and put in place in F&BA and all contracts for telephony are being referred for approval. A specialist telephony consultant has also been employed to work with F&BA on the contractual requirements

5.3.3 Compliance with BBC data retention requirements

Finding	Control criteria	Programme(s)
<p>For Children’s 1, the BBC’s contract with its telecom service provider (TSP) requires that the TSP deletes all messages from callers after 21 days.</p> <p>At the time of our assessment, some messages had been retained longer than the 21 day requirement: messages over 21 days are deleted monthly as part of the TSP’s storage management process.</p> <p>It was noted that this has now been increased to be a weekly process.</p>	<p><i>Good practice control</i></p>	<ul style="list-style-type: none"> Children’s 1
<p>Recommendation</p>		
<p>We recommend that the TSP should introduce a process to enforce the deletion of all message data after 21 days.</p>		
<p>BBC report</p>		
<p>Not applicable to the BBC Report.</p>		

6 Statement of Responsibility

We take responsibility for this report which is prepared on the basis of the limitations set out below and in the Introduction section of this report. The matters raised in this report are only those which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that may exist or all improvements that might be made. Any recommendations made for improvements should be assessed by you for their full impact before they are implemented.

Deloitte & Touche LLP London

September 2007

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