



**The Scottish
Daily Newspaper
Society**

JBR\LS

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21 LANSDOWNE CRESCENT
EDINBURGH EH12 5EH
Tel: 0131 535 1064
Fax: 0131 535 1063
Email: info@sdns.org.uk

Glasgow Commonwealth Games Bill Team
Scottish Executive
1-B North
Sports Division
Victoria Quay
EDINBURGH
EH6 6QQ

Dear Sirs

Draft Glasgow Commonwealth Games Bill

I am writing to give you the views of the Scottish Daily Newspaper Society (SDNS) on the above. The SDNS is the representative body for Scotland's morning, evening and Sunday newspapers including a number of UK national newspapers publishing a major Scottish edition.

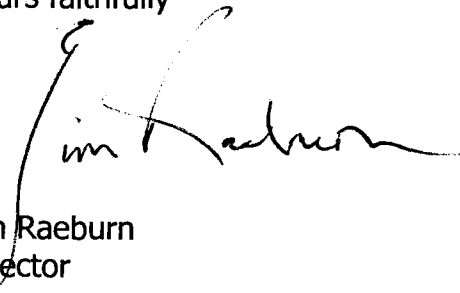
The matters I wish to highlight at this stage are as follows:

- Both Section 2 and Section 9 use the phrase "in the vicinity of" (as does the London Olympics Act). This is vague and therefore the regulations, in defining the prescribed places where the relevant offence can be committed, should be drafted so as to keep the "exclusion zones" to the minimum required in order to avoid unnecessary restriction of legitimate business activity.
- It will be important that the street trading regulations and advertising regulations are drafted so as to ensure that the sale and supply of newspapers, and indeed of news services (e.g. text to mobiles, broadcast, access to websites, etc) in the area can continue. The definition of advertising in the Bill will catch such activities and therefore a specific exemption will be needed in the regulations. I understand that such an exemption is to be granted in respect of the London Olympics and therefore I would see no basis for any objection for similar exemption in the case of the Glasgow Games.

- The draft Bill does not deal with the creation and administration of the intellectual property rights in the Games "brand". Again, as with the London Olympics, it is essential that there should be an appropriate exemption/exclusion to ensure that there is no restriction on references to the Games in any form of editorial usage (which must include news reports, comments, profiles, readers letters, etc) and in any media (newspapers, websites, etc).

Please do not hesitate to contact me should you wish to discuss these matters further. I look forward to hearing from you as and when the Bill and the regulations are drafted.

Yours faithfully

A handwritten signature in black ink, appearing to read "Jim Raeburn". The signature is written in a cursive style with a large, sweeping initial "J".

Jim Raeburn
Director