From: svodauscontent
To: [redacted]; svodauscontent; [redacted]
Cc: [redacted]
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]
Date: Wednesday, 25 March 2026 5:42:47 PM
Attachments: image001.png
image002.png
image003.png
image004.png

OFFICIAL

Hi [redacted],

Thank you for sending these questions through ahead of time… It's very helpful for us to consider.

Cheers,

[redacted]

OFFICIAL

From: [redacted]@wbd.com>
Sent: Wednesday, 25 March 2026 4:52 PM
To: svodauscontent <svodauscontent@acma.gov.au>; [redacted]@wbd.com>
Cc: [redacted]@acma.gov.au>
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

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Many thanks, Adam.

Confirming that we have received the invite. On our end, the following folks will be joining:

1. [redacted] Streaming Legal
2. [redacted] Govt Affairs
3. [redacted] Legal
4. [redacted] Legal
5. [redacted] Content Strategy

[redacted]

To facilitate our chat on Apr 2, we are sharing, in advance, questions that we have:

- What constitutes “expenditure incurred during pre-production of the program”, “investing in the program” and “some post-production expenditure”?
- Can projects that access state or federal funding be acquitted? Is it the gross spend or net spend (net of production rebate) that is acquitted against our obligation?
- What is the delineation between “Reality” and “Documentary”?
- Would a live broadcast of an Australian awards show count as an “eligible arts program”?
- If we were to take international rights to a qualifying program, can we count the full fee or only the Australian component?
- If we were to take international rights to an ANZ program that qualifies for another streamer, could we count this against the quota?
- Would a “certificate of origin” (from Screen Australia) be sufficient to prove/ascertain that the program is an “Australian program”?
- To confirm that spend is acquitted on cash/ on payment terms.

Look forward to chatting next week. Feel free to get in touch for anything in the interim.

Thanks v much.

Cheers,
[redacted]

OFFICIAL

From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Wednesday, 25 March, 2026 11:13 AM
To: [redacted]@wbd.com>; svodauscontent <svodauscontent@acma.gov.au>; [redacted]@wbd.com>
Cc: [redacted]@acma.gov.au>
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

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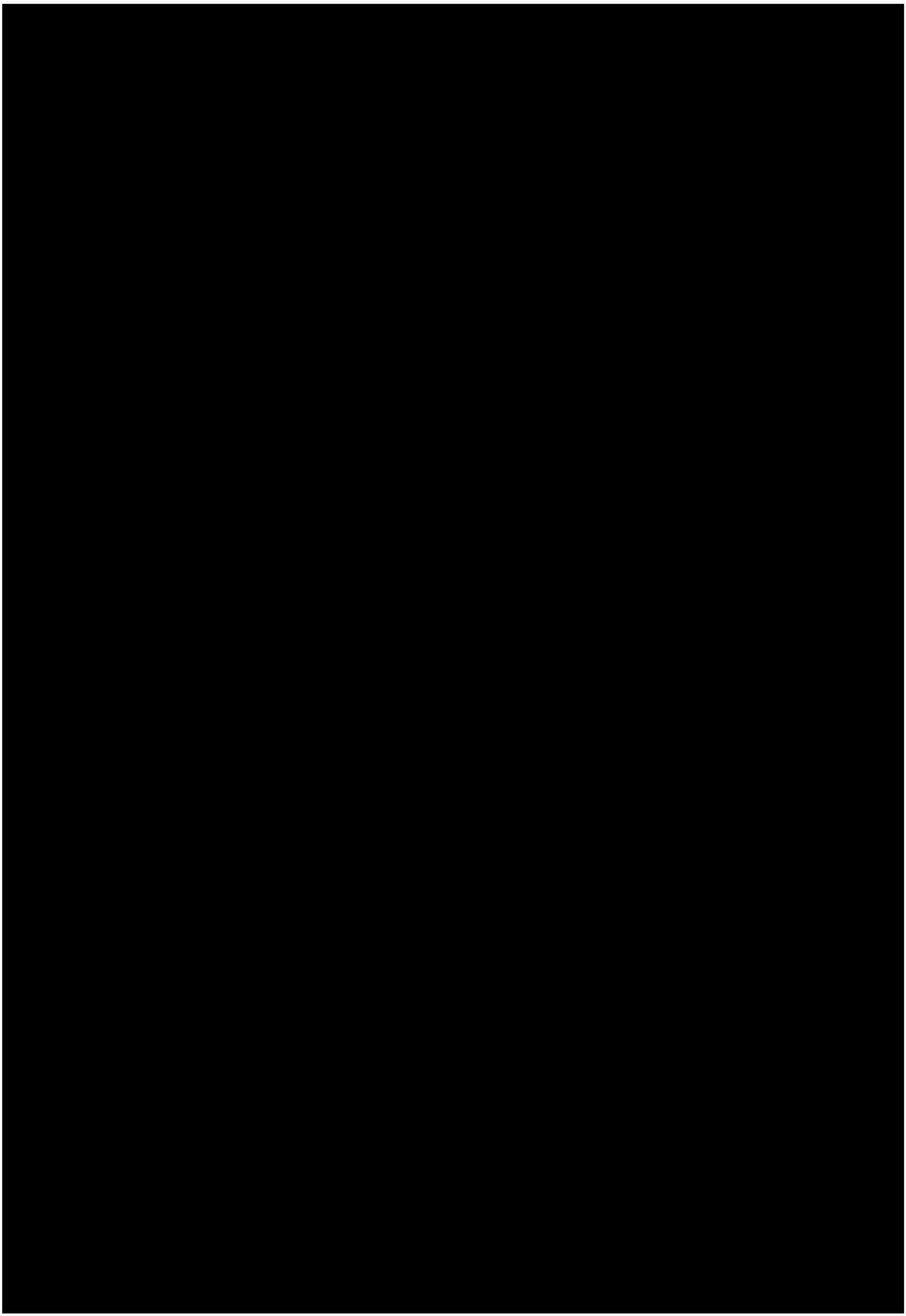
Hi [redacted],

We are free at 3pm on Thursday 2 April. I’ll send through an invite shortly.

[redacted]

OFFICIAL

From: [redacted]@wbd.com>



[redacted]

From: [redacted]@wbd.com>
Sent: Tuesday, 17 March 2026 11:23 AM
To: svodauscontent <svodauscontent@acma.gov.au>; [redacted]@wbd.com>
Cc: [redacted]@acma.gov.au>
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

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Hi [redacted],

We appreciate ACMA confirming our understanding. In this regard, we consent to having HBO Max disclosed.

Thanks so much. We'll round back with options for meeting times/dates.

Have a wonderful week ahead.

Cheers,
[redacted]

OFFICIAL

From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Tuesday, 17 March, 2026 5:38 AM
To: [redacted]@wbd.com>; [redacted]@wbd.com>; svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@acma.gov.au>
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

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Good morning [redacted]

Thank you for confirming that HBO Max consents to having its name disclosed as having at least 1 million subscribers. Responses to your couple of points are below.

1. We can confirm that HBO Max's actual subscriber numbers will not be disclosed – as this is commercially sensitive information. We will only be disclosing that you have an Australian content requirement.
2. We would release HBO Max's name along with all other services that provide consent for their name to be published.

[redacted]

Cheers,

[redacted]

[redacted]
A/g Manager
Content Reporting and Bargaining

Australian Communications and Media Authority
[redacted]@acma.gov.au
acma.gov.au

The ACMA acknowledges First Nations peoples as the Traditional Owners and Custodians of Australia. We respect and celebrate First Nations peoples as the original storytellers and content creators of the lands on which we work and honour the enduring strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past, present, and emerging.



OFFICIAL

From: [redacted]@wbd.com>
Sent: Monday, 16 March 2026 12:24 PM
To: [redacted]@wbd.com>; svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@acma.gov.au>
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

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Hi [redacted], all,

Regarding ACMA's request to disclose the name of HBO Max, we are prepared to consent, on the conditions that:

1. HBO Max's subscriber numbers will not be disclosed, beyond confirming that HBO Max has more than 1 million subscribers and so is captured by the Australian local content regulations; and
2. HBO Max will be listed alongside all other SVOD services which fall within this category.

If any part of our understanding is incorrect, please let us know before ACMA proceeds.

In addition, we continue to review ACMA's published guidance internally. We will round back to ACMA with options for our meeting with ACMA in due course.

Thanks v much.

Cheers,
[redacted]

OFFICIAL

From: [redacted]@wbd.com>
Sent: Friday, 6 March, 2026 11:14 AM
To: svodauscontent <svodauscontent@acma.gov.au>; [redacted]@wbd.com>
Cc: [redacted]@acma.gov.au>
Subject: RE: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

Dear [redacted]

Thanks very much for this.

We will discuss internally and get back to you on potential meeting dates and your request to disclose the name of HBO Max.

Kind regards
[redacted]

From: svodauscontent <svodauscontent@acma.gov.au>

Sent: Friday, March 6, 2026 9:11 AM
To: [redacted]@wbd.com>; [redacted]
[redacted]@wbd.com>
Cc: svodauscontent <svodauscontent@acma.gov.au>; [redacted]
[redacted]@acma.gov.au>
Subject: Embargoed information and request for meeting - SVOD Australian Content Requirement [SEC=OFFICIAL]

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OFFICIAL

Good morning [redacted] and [redacted]

Information on the SVOD Australian Content Requirement

Thank you for making your annual notification to the ACMA on 2 March, which confirmed that your subscription video on demand (SVOD) service HBO Max is a regulated SVOD service and has an Australian content expenditure requirement for the 2026 SVOD reporting year.

The ACMA is now in a position to share embargoed copies of five factsheets that explain key elements of how the Australian Content Requirement works. The information contained in these factsheets will be published on the ACMA's website on **Tuesday 10 March**.

Please note that these factsheets provide preliminary information, and the ACMA plans to provide additional guidance as the year progresses.

[redacted] s 47, s 47G

[redacted] s 47, s 47G

Meeting request

We would appreciate the opportunity to meet with you in the coming weeks to hear from you about what additional guidance materials you would like to see the ACMA develop. We also hope to use this meeting as an opportunity to discuss other implementation priorities.

[redacted] s 47, s 47G

In the first instance, could you please confirm a few times that you may be able to accommodate a meeting from the week commencing 23 March.

Consent to disclose the name of your service

Understandably, there is some interest from the general public in understanding which SVOD services meet the definition of a major SVOD service – and will therefore have an Australian content expenditure requirement to meet.

We appreciate that subscriber numbers are provided on a confidential basis and will not be disclosed. However, we wanted to seek your consent to publicly disclose that HBO Max has over 1 million paying subscribers in Australia – and will have an expenditure requirement for the SVOD reporting year.

We look forward to hearing from you shortly.

Kind regards,

[redacted]

[redacted]
Senior Regulatory Officer
Content Reporting and Bargaining

Australian Communications and Media Authority
[redacted]@acma.gov.au
acma.gov.au

The ACMA acknowledges First Nations peoples as the Traditional Owners and Custodians of Australia. We respect and celebrate First Nations peoples as the original storytellers and content creators of the lands on which we work and honour the enduring strength and commitment of Aboriginal and Torres Strait Islander peoples to the land, waters and their communities. We pay our respects to Elders past, present, and emerging.



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