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From: [redacted]@wbdcontractor.com>
Sent: Tuesday, 16 June 2026 2:55 PM
To: svodauscontent <svodauscontent@acma.gov.au>; [redacted] @wbd.com>; [redacted] @wbd.com>
Cc: svodauscontent <svodauscontent@acma.gov.au>
Subject: Re: SVOD Aus content requirement [redacted] s 47 C [redacted]
[SEC=OFFICIAL:Sensitive]

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Dear [redacted],

Thank you. Although I previously worked at the [redacted] I am still getting up to speed on the implementation guidelines and their interpretation.

I have a question following [redacted] email- [redacted] Would it be possible to share that with us?

Many thanks
[redacted]

Get Outlook for Mac

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From: svodauscontent <svodauscontent@acma.gov.au>
Date: Friday, 12 June 2026 at 7:46 AM
To: [redacted] @wbdcontractor.com>; [redacted] @wbd.com>; [redacted] @wbd.com>
Cc: svodauscontent <svodauscontent@acma.gov.au>
Subject: RE: SVOD Aus content requirement - [redacted] s 47 C [redacted]
[SEC=OFFICIAL:Sensitive]

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Dear [redacted], [redacted] and [redacted]

[redacted] s 47 C [redacted]

We'll be discussing [redacted] in general terms at the upcoming 'town hall' on 22 June, but we wanted to come back to you directly [redacted] s 47 C [redacted]

[redacted]

[redacted] s 47 C [redacted].

You also had some questions regarding qualifying expenditure (localisation costs, international rights etc). [redacted] wrote to you on 21 May to say we'd updated our published guidance materials, which we anticipated would address your questions.

We hope the information below and our updated guidance has addressed your queries. We are very happy to discuss any issues/questions etc either at the town hall (to the extent you're happy to discuss them in that forum) or separately.

Regards,
[redacted]

****

Issue 1: Method of lodgement. We note from ACMA's email that lodgement would be via an online system. We look forward to previewing the online system, when ready.

Noted. We will provide access to the online system as soon as we're able, and will develop a user guide to assist SVODs.

Regarding "Publishing information", we note and appreciate that ACMA intends to publish only aggregated information about SVOD services' qualifying expenditure used to acquit the Australian content requirement. Would ACMA consider sharing an advance copy of the aggregated information to be published, including the manner and format in which the aggregated information will be presented, with major SVODs prior to publication?

Noted. We are considering the content and format of published compliance results and will raise this with SVODs, likely later in 2026 (and before the submission of the first annual compliance reports in February 2027).

[redacted] s 47C [redacted]

[redacted] s 47C [redacted]

s 47C

...

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From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Friday, 8 May 2026 1:21 PM
To: [redacted]@wbd.com>; svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@wbd.com>; [redacted]
[redacted]@wbd.com>
Subject: RE: SVOD Aus content requirement s 47 C
[SEC=OFFICIAL:Sensitive]

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Hi [redacted]

s 47C

I appreciate the follow up on the outstanding questions that HBO had in our previous meeting, we are working through these questions and will be in a position to respond

shortly.

Cheers,

[redacted]

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From: [redacted]@wbd.com>
Sent: Friday, 8 May 2026 12:37 PM
To: svodauscontent <svodauscontent@acma.gov.au>
Cc: [redacted]@wbd.com>; [redacted]
[redacted]@wbd.com>
Subject: RE: SVOD Aus content requirement - s 47 C [SEC=OFFICIAL:Sensitive]

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Hi [redacted], all,

s 47 C

s 47 C

We also wanted to follow up on our virtual meeting with ACMA on 2 April, during which ACMA helpfully clarified several implementation questions. Since that discussion, we note that ACMA has shared additional guidance with us as well as updated its website, both of which we have found useful.

We would appreciate ACMA's guidance on the below outstanding questions:

- How will the qualification of programs be audited? I.e., if a producer only provides 90% of the information can we still say something qualifies? We also flagged potential challenges with obtaining such information from distributors.
- Can localization costs (incurred before the program is made available in Australia) can be counted towards qualifying expenditure?
- If we were to take international rights to a qualifying program, can we count the full fee or only the Australia component?
- If we were to take international rights to an ANZ program that qualifies for another

platform (i.e., Stan) could we count this against the quota?

- Can content with a simultaneous broadcast with other AU broadcasters/platforms (other than Cinema) still count towards our expenditure as a “first run” program/”Not previously available in Australia”?

Guidance on the above would be very helpful in providing clarity and certainty as we take steps towards acquittal. Happy to set up a call, if preferred.

Thank you again, and we look forward to continuing to partner closely with ACMA on implementation.

Cheers,
[redacted]

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From: [redacted]
Sent: Tuesday, 14 April, 2026 4:20 PM
To: 'svodauscontent' <svodauscontent@acma.gov.au>
Cc: [redacted]@wbd.com>
Subject: RE: SVOD Aus content requirement – s 47 C [redacted]
[SEC=OFFICIAL:Sensitive]

Hi [redacted]

Acknowledging receipt on behalf of HBO Max. Thank you for this.

[redacted]

Cheers,
[redacted]

From: svodauscontent <svodauscontent@acma.gov.au>
Sent: Tuesday, 14 April, 2026 1:02 PM
To: svodauscontent <svodauscontent@acma.gov.au>
Subject: SVOD Aus content requirement s 47 C [redacted]
[SEC=OFFICIAL:Sensitive]

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Dear all,

Thank you for meeting with us in recent weeks to discuss progress on the

implementation of the SVOD Australian content requirement – we appreciate your time and engagement.

As discussed, we are working towards an online system for annual compliance reporting [redacted] s 47C [redacted]

- [redacted] s 47C [redacted]
- [redacted]

[redacted] S 47C [redacted]

[redacted] s 47 C [redacted]

As discussed, we are considering what additional information will be required to support claims made in the annual compliance report, including in relation to the Australian program definition, and expect to be in touch about this in late May/early June.

Kind regards,

[redacted]

[redacted]
Assistant Manager
Content Reporting & Bargaining Section

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

The ACMA acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to land, culture and community. We pay our respects to Elders past, present and future.

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