



Consumer Magazines: Reporting Standards changes, issued June 2013, effective from July 2013.

### General Principles and Record keeping

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Contras	<p>Contra Transactions. Paid copies must be excluded where:</p> <ul style="list-style-type: none"> <li>- The value of the copies is redeemed in cash, kind or by contra.</li> <li>- Part of the value of the copies is redeemed in cash, kind or by contra, resulting in the net contribution to the publisher falling below the minimum required by that category of circulation</li> </ul>	<p>Moved to each paid circulation section and reworded: There are two versions, a simple one based on cash reimbursements aimed at individual consumer categories, e.g. see retail sales 4b: <i>However cash reimbursements to the consumer must be taken into account (excluding limited low chance lottery style promotions)</i></p> <p>and a clearer expanded version for corporate categories e.g. see Multiple Copy Sales 3a(i):</p> <p><i>When calculating what price has been paid you must take into account:</i></p> <ul style="list-style-type: none"> <li>- Any reciprocal payments made by the publisher</li> <li>- Any reciprocal charges for goods or services made by the purchaser (or the intermediary if applicable) as part of the deal (for example: for distribution or marketing).</li> <li>- The value of any other goods or services provided free or discounted by the publisher (for example advertising or promotional messages).</li> </ul>	Clarity
2.	Audit Issue	Audit issue (used for duplication testing and record keeping requirements only) is stipulated for 6 month June and December ending Reporting Periods and 3 month periods but silent for other optional reporting periods	Apply same requirement for 3 month periods to other optional periods (issue nearest to 1 <sup>st</sup> day of last month in the period)	Harmonisation

**Reported Data - None.**



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### Retail Sales (Sale or Return)

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Name	Referred to as Newstrade	Change name to Retail Sales	Clarity
2.	Copies paid for	-  -	New principle 'Single copy knowingly paid for by the consumer to the retailer'  Specified may be purchased by cash or other means agreed by ABC in writing	Harmonisation  To cover possibilities such as loyalty card schemes
3.	Reporting net sale accurately	Auditable incentive for unsold copies to be returned*	Incentive for unsold copies/net sale to be <i>reported</i> [not always physically returned and covers pay on scan]	Clarity
4.	Payment for each copy	Publisher must receive positive financial contribution*  *If publisher can demonstrate to ABC an alternative method of verifying copies then these 2 requirements need not apply	Remove, copy must be purchased from publisher  Remove  Where the publisher and retailer are not 3 <sup>rd</sup> party then evidence of purchase by the consumer is required (customer magazine scenario)	Harmonisation  Clarity
5.	Publication of Cover Price	Must publish on or within every copy claimed as newstrade	Cover Price must be published on or inside front or back cover of publication	Harmonisation
6.	Price Paid	-	New principle 'Price Paid by the consumer must be clear and conspicuous'	Clarity
7.	Price Paid	-	Addition of assumption that sales by retailers will be treated as sales at the cover price unless there is evidence to the contrary.	Clarity
8.	Publisher controlled promotions	Provisions must be made for voucher redemption where a promotional scheme extends over different reporting periods.	New allowance to use wash through basis if reporting on a monthly basis and effect on figures is less than 2%	Harmonisation



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**Retail Sales (Firm Sale)**

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Name	Referred to as newstrade	Retail Sale	Clarity
2.	Relevant changes as above for Sale or Return.			
3.	Firm sale arrangements	-	New principle: 'The retailers' ability to vary supply must not be unduly restricted'	To ensure bona fide firm sales claimed
4.	Back issues	Back issues up to 12 months old can be claimed	You cannot claim back issue sales to the retailer	Clarity (now separated out from SOR)
5.	Publisher promotions - vouchers	Not current rule but included in previous draft in error: consumer using voucher must pay at least retail margin in cash	Remove (i.e. no change)	No rule change
6.	Treatment of firm sale copies	The initial supply will be the claimed sale [but there is a lack of clarity on treatment of copies given away free, sold at reduced price or using vouchers].	Proposed clarification:  a) Copies sold to the retailer can be claimed as sales at the cover price unless there is evidence to the contrary, in which case claims should be adjusted as follows:  i) The retailer distributes copies free to the consumer (these should be removed from claim)  ii) The retailer sells copies at less than the Basic Cover Price (these may be claimed in the appropriate rate band).  iii) The consumer makes part payment using a voucher from a publisher controlled promotion (these may be claimed in the appropriate rate band unless acceptance and redemption of vouchers is explicitly not allowed in the	Clarity (now separated out from SOR)



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			<p>agreement between the publisher and the retailer in which case the voucher can be ignored),</p> <p>iv) The consumer makes full payment using a voucher from a publisher controlled promotion (these should be removed from the claim).</p> <p>For the avoidance of doubt: copies disposed of by the retailer (not sold to a consumer) do not need to be deducted.</p>	
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### Single Copy Sales

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Relevant changes as above for Sale or Return.			

### Single Copy Subscriptions

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Gifts and subscription packages	<p>Referred to by examples:</p> <p>1. A subscription where a gift is offered free to subscriber will be full rate unless cost of gift to publisher exceeds price of 1 year's subscription. If gift is obtained free by publisher ABC will assign notional value.</p> <p>2. If 2 different publications in offer and one is stated as being free then it will be treated as free.</p>	<p>Clarification of method to address treatment of gifts and bundling:</p> <p>1. Where only 1 product is ABC claimed: the value (or perceived value) of gifts to the consumer have no effect in the price paid for ABC purposes)</p> <p>2. Where more than one product is ABC claimed: there is a hierarchy to determine treatment – see rule.</p>	<p>Clarity</p> <p>(Recognition of current treatment)</p>
2.	Distribution of copy	Copies must be individually addressed	Copies must be distributed to a known addressee	Principle based approach –



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				allowing for differing dist'n methods
3.	Distribution of copy	Addressed to a person by name or an organisation	Copies must be distributed to a known addressee	Not needed.
4.	Regularity of copy	Must be delivered on an every issue basis	Principle – for a contracted period.	Flexibility/harmonisation
5.	Payment	-	Principle of knowingly paid for added  Specified may be purchased by cash or other means agreed by ABC in writing	Clarity  To cover possibilities such as loyalty card schemes
6.	Subscription term	Must be for a fixed term unless contracted under continuous payment authority and sent consecutive copies	Removed	Covered by contracted period principle.
7.	Minimum subscription term	At least 3 issues/3 months (whichever the greater)	Minimum 2 issues	Simplification/harmonisation
8.	Payment in arrears	Copies can be claimed if accepted by auditor as generated from positive contract to purchase and supported by billing series	Can claim as long as reasonable grounds to consider them to be live good and collectable.	Harmonisation
9.	Distribution	Must be through third party	Removed as explicit requirement. Guidance added that will typically be through 3 <sup>rd</sup> party distributor	Flexibility
10.	Basic Annual Rate (BAR) - definition	Standard 1 year rate, undiscounted (normally highest) in contrast to special price to limited class or limited conditions	Standard 1 year rate for the publication, in contrast to a special price only available to a limited class, or under limited conditions	Harmonisation
11.	Publication of BARs	Must publish in every issue or register with ABC	Just required to publish [i.e. publicly available, not necessarily in magazine). Removal of registration of rates with ABC.	Harmonisation
12.	Copies sold via a subscription agency	You may claim copies sold via a sub agency at full rate as long as: 1) Written contractual arrangement stating agent's commission 2) Agent's commission must be less than amount paid by subscriber 3) The publisher hasn't agreed a lower rate	Can be assumed to be paid at full rate unless evidence to the contrary	Harmonisation



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13.	Mailing list	Must include subs on audit issue mailing list	Must include subs on audit issue mailing list + be able to recreate any list on request	Audit
14.	Unpaid copies	Must report to ABC unpaid copies that remain unpaid > 3 months in UK and > 6 months overseas	Remove (covered by live, good and collectable rule)	Not necessary, covered at audit
15.	Merger of titles, buying ceased title lists	If buy list from ceased title, the first issue must be distributed within 6 months of last issue of ceased publication	Remove	Not necessary – subscriber has either opted in or been given chance to opt out.
16.	Telephone canvassing of 'Bill me' subscribers	Must ask and record ABC personal Identifier Question	Remove (covered by principles of evidence)	Principle based approach, flexibility

### Multiple Copy Subscription Sales

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Relevant changes as above for Single Copy Subscriptions			

### Multiple Copy Sales

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Regular and Issue Specific multiple copy sale distinction	Two categories defined and reported	One multiple copy sale category	Harmonisation, simplicity
2.	Minimum number of issues	Regular: <ul style="list-style-type: none"> <li>– For at least 4 issues in each 12 month period for monthly publications;</li> <li>– For at least 12 issues in 12 months for weekly publications</li> <li>– For all the issues if less than 4 in a year</li> </ul>	At least 1 issue (simplify in moving to one category)	Harmonisation, simplicity

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3.	Variation in quantities	Regular: Any one issue must not vary from average quantity under that contract by > 20% or 50 copies, whichever is the greater (exceptions for double issues in certain circumstances)	Remove (simplify in moving to one category)	Harmonisation, simplicity
4.	Claimed quantity should not exceed potential demand by consumers	Copies purchased by a consumer via a promotion controlled by a party independent of the publisher may be claimed as a multiple copy sale providing requirements are met.	<p>Copies purchased by a consumer, wholly or in part by coupon(s) obtained via a promotion controlled by a party independent of the publisher, can be claimed (on a sale or return basis) providing:</p> <ul style="list-style-type: none"> <li>i) The Publisher has no control over the conversion of coupons into cash, (i.e. coupon redemption must be direct between the retailer of the Publication and the independent promoter or their agent)</li> <li>ii) The final number of copies that may be claimed will be based upon the number of copies that can be proven by the redemption of vouchers and amount paid. Note: As the copies may have been initially supplied via the newstrade, care must be taken not to double count these copies in the circulation claim.</li> </ul>	Harmonisation
5.	Claimed quantity should not exceed potential demand by consumers	-	[Apart from multipacks and promotions above]...In other situations you must be able to demonstrate that the claimed quantity would not exceed the potential demand by the intended consumers.	Clarity on principle
6.	Minimum Price (issue specific multiple copy sales)	Issue specific: At least 20% of Basic Cover Price	<ul style="list-style-type: none"> <li>a) The price paid must be at least minimum legal tender per copy (net), except for any short term arrangement, defined as follows: <ul style="list-style-type: none"> <li>i) Any short term multiple copy sale transaction with the same purchaser where the total number of issues is equivalent cumulatively to a 2 month period or less in duration, (e.g. broadly 2 issues of a monthly publication, 8 issues of a weekly publication), can only be claimed if the final purchaser has paid at least</li> </ul> </li> </ul>	Simplicity



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			20% of the Basic Cover Price per copy (net).	
7.	Rate band reporting	Multiple copy sales reported:  Regular: > 50% of full rate 10-50% of full rate < 10% of full rate  Issue Specific: > 50% of full rate 20-50% of full rate	One rate band only (as unlikely sold at full rate or many different rates). (simplify in moving to one category)	Harmonisation, simplicity
8.	Reporting of quantities	Issue Specific: broken out by each issue	Removed (simplify in moving to one category)	Harmonisation, simplicity
9.	Contract requirement	Must be dated prior to commencement of supply (regular)	Remove	Harmonisation, flexibility
10.	Claimed quantity should not exceed potential demand by end users	Only in case of copies sold for inclusion in newstrade multipack where must be restricted to number actually sold	Retain multipack requirement. New principle added that quantity claimed should not exceed potential demand	Harmonisation.
11.	Copies sold for airside and International rail dist'n	-	Requirement added recognising situation that occurs when an authorised distributor is used to sell copies in security restricted areas.	Harmonisation
12.	Publication of cover price	Cover Price must be published on or in every issue claimed in UK as multiple copy sale	Remove	Not necessary
13.	Distribution evidence	Distribution evidence is either signed and dated delivery notes from purchaser, delivery notes/invoices from independent distributor or normal newstrade evidence	Removed prescription – must still able to demonstrate copies distributed	Principle based approach, flexibility

### Society/Association/Organisation Circulation

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Distribution of copy	Distributed individually addressed to current member of society	Distributed to individual who is a member of the society.  Have removed a reference to paid up member of	Principle based approach – allowing for



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			society as this is not an absolute requirement.	differing dist'n methods. Clarity
2.	Regularity of copy	Must be delivered on an every issue basis (paid optional copies)	Remove - principle requires it to be for a contracted period.	Flexibility/harm onisation
3.	Corporate members	Individuals nominated by paid corporate members allowable	Change to <i>employees</i> under a corporate membership.	Clarity
4.	Society information	Must report number of society members and corporate members	Remove	Not circulation information
5.	Rates	Details of membership rates and amounts paid for publication must be available.	Remove as requirement but add to guidance	Society paid copies are not reported by rate. This is an aid to audit only.
6.	Unpaid copies	Must report to ABC unpaid copies that remain unpaid up to 3 months in UK and up to 6 months overseas and any copies unpaid after these periods must be excluded.	Remove (covered by live, good and collectable rule)	Not necessary, covered at audit
7.	Non-optional copies	Sent at society's discretion	Remove	Harmonise

### Controlled Circulation

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Distribution of copy	Distributed individually wrapped and addressed	Principle of distributed to individual. Each copy should be addressed or accompanied by instructions which enable the distributor to deliver to the individual.	Principle based approach – allowing for differing dist'n methods
2.	Terms of Control	Must not include prescribed words  Request documentation must not explicitly or implicitly lead the addressee to give desired criteria to receive publication	Must not include words that are subjective or difficult to prove – the examples are moved to guidance  Must be possible for individual not to meet terms of control.	Principle based approach



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			Must be at least one qualifying demographic which is neither 1) a geographic criteria at a country level or higher; or 2) an interest in the field	Harmonisation  Harmonisation
3.	Terms of Control	Must be agreed with ABC and if change during period must be notified and both pre and post change TOC must be stated on return.	The publisher sets the terms of control, you will report the applicable Terms of Control.	Harmonisation
4.	Distribution	Must be sent on an every issue basis	Remove	Harmonisation
5.	Requests	Request is valid for less than 3 years if this is stated	Remove	Unnecessary
6.	Requests	Individual requests must be by name and only 1 copy per request	Single copy per individual principle plus by name retained but duplication level will deal with any 'multiple instances of an individual.	Clarity
7.	Requests	Request document must prove Terms of Control met	Remove (i.e. allow secondary sourcing)	Harmonise
8.	Requests by type	Analysed by individual and company requests in writing and by telecommunication	Just individual and company requests – remove request method	Simplification
9.	Dual/multifunction requests	Requires separate signature/request question + delineated box + detail on font sizes etc	Removed detail – covered by requirement for clear request to receive the publication. Guidance includes examples of multi-requests.	Simplification
10.	Telephone requests	We may insist telephone system is tested	Remove	Audit requirement
11.	Telephone requests – recording systems	-	We can approve systems that will avoid need for PIQs	Flexibility
12.	Non-requested source documentation	Documentation produced at audit must be original and there must be audit trail between mailing list and source	Remove	Audit judgement on source material. Audit trail requirement unnecessary as a list requirement.



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### Non-Controlled Circulation

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Distribution of copy	Distributed individually wrapped and addressed	Principle of distributed to individual. Each copy should be addressed or accompanied by instructions which enable the distributor to deliver to the individual.	Principle based approach – allowing for differing dist'n methods
2.	Distribution of copy	Single copy per addressee for exhibition copies	Single copy per issue principle to whole category. Duplications will deal with any multiple instances of an individual receiving copies.	Clarity
3.	Mailing list	Must include copies on audit issue mailing list	Must include copies on audit issue mailing list + be able to recreate any list on request	Audit
4.	Exhibition copies	Specific requirements for copies signed for at exhibitions	Moved to guidance – principle covers copies evidenced at other locations	Flexibility/ Harmonisation

### Monitored Free Distribution

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Prior approval	Written ABC approval of distribution system must be obtained before a membership application can be approved.	Removed. Can still be obtained but not mandatory.	Flexibility
2.	Distribution evidence and point types	Evidence detailed with reference to manned and unmanned points (manned means someone at point has to sign, at unmanned points the deliverer can sign)	Manned/unmanned distinction and prescription re signed documents removed. Principle is that must have evidence of distribution – guidance refers to common methods – one of which is signed documents.	Principle based approach
3.	Distribution evidence	Note: With ABC's agreement a system may be used where: - The staff member at a distribution point signs (recording time and date) for receipt of a uniquely identified consignment/package	Removed (covered by principles)	Principle based approach



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		<ul style="list-style-type: none"> <li>- The contents of the package (title, issue and quantity as detailed above) can be clearly traced to packing/despatch documentation provided by a distributor/fulfilment house which is third party to the publisher.</li> <li>- The packing/despatch documentation can be clearly traced to invoice and payment.</li> </ul>		
4.	Total potential demand	-	New principle that quantity claimed should not exceed potential demand by the intended consumers (does not mean caps as in other sectors but is a sense check).	Harmonisation
5.	Significant changes in distribution	Notification/approval is required for decreases/increases in distribution greater than 10%, compared to the average MFD of previous four issues	Only if there are less than 4 issues distributed in a calendar year then these changes will be assessed against the average MFD of the issues in the last 12 months	Relevancy

### Digital Editions

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Supplements	Where all supplements accompanying print Parent Edition are not included this will be reported on the certificate	Remove	Specific requirements re editorial & advertising changes introduced since this rule written, not considered necessary
2.	Registration	Fundamental changes to Digital Edition must be notified to ABC	Remove	Not sure of purpose as mandated.
3.	Registration	ABC may contact any purchaser/addressee at any point for further verification	Limited to free copies only	Matched to audit testing
4.	Free copy email notification	Specifies precisely what system generated proof must be available	Requirement is that publisher must be able to demonstrate the emails sent and hard bouncebacks	Principle based



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			received – the other information has been moved to guidance as an example	approach
5.	Standards of Availability	Current rule prescribes how ABC will test whether a Digital Edition is published/ available and how it will retest and apply results	Removed	Audit testing does not need prescribing in this detail.
6.	Bundling treatment with print copy	If a digital edition is bundled with a print copy the price must be split equally for ABC purposes	Replaced with same bundling treatment as subscriptions for consistency (i.e. ignore non-ABC audited product, allocate price of ABC audited products by terms of offer or pro-rated or equally (if no means of pro-rating)	Consistency
7.	Publicity	Average circulation must be quoted alongside any digital edition figure, Digital edition figures must not be added to print figures and presented as ABC figures.	Removed	New publicity Byelaws cover clarity and transparency of this data.

**Social Media** - None.

### Basic Cover Price

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Definition	Definition: The Basic Cover Price for ABC purposes will be that at which a single copy of the Publication may normally be purchased, in contrast to a special price for a limited period	The Basic Cover Price is the published cover price at which a single copy of the publication may be purchased without limitation and for an on-going duration, in contrast to a short term price or a special price only available to a limited class, or under limited conditions.	Harmonisation
2.	Failure to publish Cover Price	In summary: If cover price fails to be published must notify ABC within 8 weeks of the issue or by Return submission deadline (whichever sooner) including reasons and steps to prevent recurrence. ABC will decide if copies can be claimed or not (depending on exceptional circumstances being demonstrated and satisfactory audit trail existing).	Simplified description, just one deadline – the return submission deadline.	Common approach to all sectors



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3.	Reporting Other Countries Cover Price	BCP for last issue in period will be reported on the Return (does not appear on certificate)	Remove – this is to aid audit testing	Not needed.
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**Geographical Analysis - None.**

**Editions**

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Definition	Principle is that editions are sufficiently similar to be considered the 'same' product.	The branding and appearance of the edition must not give the impression that it is a different publication than the main edition. (note: a change of format alone will not infringe this requirement.	Clarity
2.	Definition	Edition must either carry a logotype/masthead incorporating the generic name of the parent publication, consistent with the general appearance of the parent publication OR carry a strapline on the masthead which clearly and prominently indicates that it is an edition	Must carry a logotype/masthead incorporating the generic name of the main edition	Harmonisation
3.	Change in editorial	If change in editorial is greater than 30% separate certification is required  Note: For calculations of changes in advertising and editorial exclude TV/Radio listings and associated commentary and themed front cover changes	The edition must have a similar editorial/advertising ratio to the main edition.  Removed	Harmonisation
4.	Reporting	If only changes in an edition are to editorial then the name of the edition only will be reported on the certificate	Removed	Harmonisation
5.	Copies reproduced abroad under licence	Cannot claim copies reproduced abroad under licence unless there is proof all such copies carried all advertising	Removed	Other requirements cover changes sufficiently



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### Issues to be Included / Excluded

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Reporting excluded issues	Rules are silent on reporting of excluded issues – but they are in fact reported on the certificate (issue ID only)	Clarify excluded issues will be reported on the certificate	Harmonisation
2.	Distribution dates (for identifying which period an issue is reported in)	Rule specifies for mailed copies this is when they enter the distribution chain and newstrade is 1 <sup>st</sup> official on-sale date	Existing definitions retained but broadened to cover all free and paid copies (e.g. MFD)	Clarity
3.	Calculating shortfall in sale for exclusion	Can apply for exclusion if severe delay in distribution results in shortfall in normal net sale greater than 10% of average of previous four issues' sales figures	Normal net sale/sales figures is clarified as Actively purchased sales	Clarity

### Reporting Periods

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Changes affecting reporting clarity	-	If in our opinion there are exceptional changes to a publication during the Reporting Period that mean issuing a Certificate for the mandatory Reporting Period in full might lead to confusion or a lack of transparency in the data certified, then we may agree or require the issue of more than one Certificate covering the mandatory period	Harmonisation
2.	Changing the mandatory reporting frequency	1. May only change 6 to 12 month reporting if have reported for at least 2 years (unless newly registered) and latest issued is July to Dec.  2. May only change 12 to 6 months or vice versa if written notification by end of reporting period in which want change.	Changing the mandatory frequency, if possible, is expected to be infrequent. We reserve the right to reject or impose conditions on requests to change frequency if in our view this might affect transparency or comparability.	Principle based approach
3.	Optional reporting periods	Titles already certified: 1, 2 or 3 calendar months, 1, 4 8 or 12 issues (weekly publications only)	Whole months or any number of whole months.	Simplicity and flexibility



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		Newly registered titles: initial monthly until start of next 6 month period, initial 3 month to June or Dec then 6 months (or 3 month then 3 month then 6 month)	Newly registered can report single issues until start of next month.	Simplicity and flexibility
		New launches – launch issue followed by 3 calendar months as above	Newly registered can report single issues until start of next month.	Simplicity and flexibility
		Issues must be closed for newstrade returns	Removed	ABC has right to audit before issue & delay until satisfied with sales
		Certificate must be issued before next mandatory period is certified	Removed	Not necessary
		Co-exists with latest 6 or 12 month figures and so must be accompanied by them	Removed	Publicity rules cover clarity
4.	Reporting periods – newly registered	Can only report one period retrospectively	Removed	Not necessary

### Certificate Types

	<u>Subject</u>	<u>Current rule</u>	<u>Change to</u>	<u>Reason</u>
1.	Group Certificates	Requirements for including publications in a group certificate: - commonly owned - Each title certified - rate card published for the combination of titles - no return submission - ABC compiles from constituent publication's returns	Remove common ownership and rate card requirement.  Clarify that titles must be certified for same period under Consumer magazine rules	Harmonisation





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### Return Form Submission and Certification

	<b>Subject</b>	<b>Current rule</b>	<b>Change to</b>	<b>Reason</b>
1.	Various	The section contains guidance re completing return forms and detail about auditors and audit work that is covered in the Byelaws, Letters of Engagement and Audit programmes	The section has therefore been honed down to the essentials of submitting data, the issue of certificates and audit/inspection.	Principle based approach.