UNIC
Union Internationale des Cinémas
International Union of Cinemas

European Commission
Copyright Unit
markt-d1@ec.europa.eu

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EC GREEN PAPER ON THE ONLINE DISTRIBUTION OF AUDIOVISUAL WORKS IN THE EU – UNIC POSITION

The Union Internationale des Cinémas ("UNIC") is pleased to participate in the Consultation regarding the EC Green paper on the online distribution of audiovisual works in the EU (from hereon: the Green Paper). We have limited our comments to issues of key concern to European cinema exhibitors.

UNIC believes that a sound understanding concerning the key characteristics of film distribution, exhibition and consumption in Europe should inform any future EC strategy in this field. The entire European film industry depends on the ability to maximise overall revenues from all version markets (release windows). Without the practice of exploiting a film according to a sophisticated release schedule, current levels of film finance, creation and cultural diversity were not possible.

1. ABOUT UNIC AND THE SOCIETAL VALUE OF CINEMA EXHIBITION

UNIC is the leading European umbrella organisation for national cinema associations and cinema operators. It currently represents the interests of exhibitors in 19 European territories. Included within the national associations and major operators – which make up the members of UNIC – are cinema sites of all sizes and locations. These vary from single screen part-time sites in isolated rural areas to large multiplex sites in major cities.

All cinema sites, whatever their size, provide their local areas with a valued community resource, a trusted and 'neutral' communal meeting place for a broad range of local people. Many are 'cultural hubs' providing access not just to art house and other specialised European films, but also to other arts and creative opportunities. And many provide much-needed employment for their local communities, either directly, or through supporting local services and suppliers. As will be seen further below, cinema exhibition is one of the most significant and the most stable version markets for film in Europe, equalling approx. € 6.5 billion box office revenue per year in EU members states alone.

Cinema provides an opportunity for people to understand and express their sense of local and national identity, reaching out to young and old and those from different backgrounds. It helps to recognise and celebrate the diversity of European nations and regions.

Above all, cinema remains the 'gold standard' environment for films - seen, as the director intended, on the big screen in front of an audience enjoying the experience together.

2. GENERAL COMMENTS

Key Characteristics of Film Distribution in Europe

In light of the European Commission's wide-ranging questions put forward in the Green Paper UNIC would like to highlight the following fundamental characteristics of European film distribution[1]:

- Copyright and neighbouring rights are essential to the well being of the film and cinema industry. They don't constitute an obstacle to the development of audiovisual markets but enable such development. Rights holders and licensees use their exclusive control over exploitation to offer content to the benefit of audiences across different media channels (cinema, DVD, VOD, pay-per-view, pay-TV, free-TV, etc.). They distinguish between the consumers' willingness to pay for content in each version market and design their exploitation strategy accordingly in order to maximise overall revenues across all media channels. This practice enables the film sector to make up for significant pre-investments and the number of films that have been unsuccessful in the market place (see further below for a description of the risk profile of the industry).

- Film is an experience good. It is valued differently by each consumer and especially by different consumer groups according to their cultural and linguistic backgrounds. Put simply and for means of illustration: someone from Denmark will most of the time value a Danish work differently than his or her German neighbour. Because of these diverging consumer tastes significant marketing and localisation efforts (dubbing, subtitling, etc.) are required to promote a film in each European territory. Such strategy is essential to create demand for a film in a specific market. In this context, contractual agreements determine the level of investments in each version market and how risks will be shared between distributors, rights holders and exhibitors. Similarly to other cultural industries, film is a high-risk and hit-driven industry. Film markets are

[1] Some of the following arguments have also been described in the following publication: Bomsel Olivier, Geffroy Anne-Gaëlle and Le Blanc Gilles, "When Internet meets Entertainment - The Economics of Digital Media Industries ", Paris, Presses de l'école des mines, 2006. They are also summarised in the KEA Study concerning the multi-territory licensing for the online distribution of audiovisual works in the EU, commissioned by the European Commission in 2009. Available at: http://ec.europa.eu/avpolicy/info_centre/library/studies/index_en.htm (November 2011)

what economists call “winner-takes-all” markets. Companies crucially depend on recouping significant investments on the basis of one successful title while other titles are unsuccessful and related investments are lost (on average only 1 in 10 films is a “winner”).

- As recognised in the Green Paper, the success of a film in home entertainment markets often depends on its success in theatrical exhibition and the related marketing efforts made in a specific territory. Success in the cinema has a positive knock-on effect on a film’s performance in other version markets. Therefore, there are economies of scope and scale in selling territorial content licenses for various media channels to one local distributor. This distributor will then adjust his release strategy in each territory based on the structure of the market and efficiently discriminate the consumer’s willingness to pay. This is common practice in information economies including publishing, software development and many other sectors. Marketing efforts made in a specific market may then benefit exploitation in all release windows. Importantly, the market structure depends on historical developments and the technical infrastructure that is available in each territory. Both have a territory-specific impact on the potential of each version market. Therefore, distributors sometimes decide that a specific version market may be more important in one country than in another country.

- Finally, given the patchwork of film-financing in Europe, works are often pre-financed by multiple stakeholders from a specific geographical territory for which the film was made/ designed (broadcasters, film funds, etc.). As a consequence the exploitation of the work in this specific territory will be prioritised. In order to exploit the film in other territories investments by a foreign distributor who will promote the title in foreign territories is required. The selection of this distributor naturally depends on the level of acquisition fees and his willingness to promote the title abroad.

The fragmentation of the European film industry which manifests itself in a rather moderate theatrical market share of non-national European film of around 8% and a similar level on VOD[2] is to a great degree explained by the cultural and the linguistic diversity of consumer markets across the EU and resulting commercial decisions of rights holders. It is not a result of copyright territoriality per se. In fact, nothing today prevents a rights holder to grant a content license on a multi-territory basis.

A Remark on the Economics of Theatrical Exhibition in Europe

From an economic perspective, cinema is one of the most significant and the most stable version markets for film in Europe. Despite the numerous challenges cinema exhibitors face, this vital segment of the film value chain has increased its turnover by 5% from 2009 – 2010.

[2] KEA study on multi-territory licensing. Section 3.1.2.2. Multiple sources from UK and France.

By way of example, the following illustrates how the EU theatrical film market performs compared to all combined European Video on Demand version markets[3]:

The continuing strength of the exhibition sector as well as the nascence and comparably moderate market share of VOD to some degree put the trends proposed by the Green Paper into question. UNIC urges the European Commission to recognise these figures before questioning fundamental practices of film distribution upon which the entire European film industry depends. The Commission should not endanger a successful and stable market for film such as theatrical exhibition by promoting policies that intend to develop a "digital single market for film" as the emergence of the latter cannot be guaranteed due to the cultural, linguistic and industrial fragmentations outlined above.

Moreover, there is a positive correlation between levels of investments for promoting the theatrical release of a film (the bulk to today's distribution costs) and the performance of a title on VOD. This is not only the case for US content but also for successful European content[6]. Similarly, UNIC would suggest that a healthy exhibition sector and a stable and exclusive theatrical exploitation window safeguard the commercial interests of all European audiovisual stakeholders along the value chain. Promoting cinema exhibition and developing new version markets thus go hand-in-hand.

The exhibition sector depends on a predictable rights licensing framework that respects exclusive exploitation practices in cinemas. This is so because cinema operators make significant long-term investments to offer their audiences viewing experiences of the highest quality possible. Investments made into digital projection, comfortable seating and the refurbishment of entire buildings over the past decades are an example for this. Only once these significant expenses as well as the continuously increasing leasing costs for properties are recouped, and once film rentals are paid to distributors, can a cinema owner make a small profit. Such profit only emerges after a certain point in time, as is shown by the graph below. The duration of the release window is therefore crucial to the business success of cinema operators and safeguards jobs in the exhibition sector. Cinemas, in this context, are

[3] Some of the VOD sub-markets, such as internet VOD, may include revenues for TV shows. However, these sub-markets make up the minority of current VOD revenues and a comparison for illustrative purposes is ligitimate.

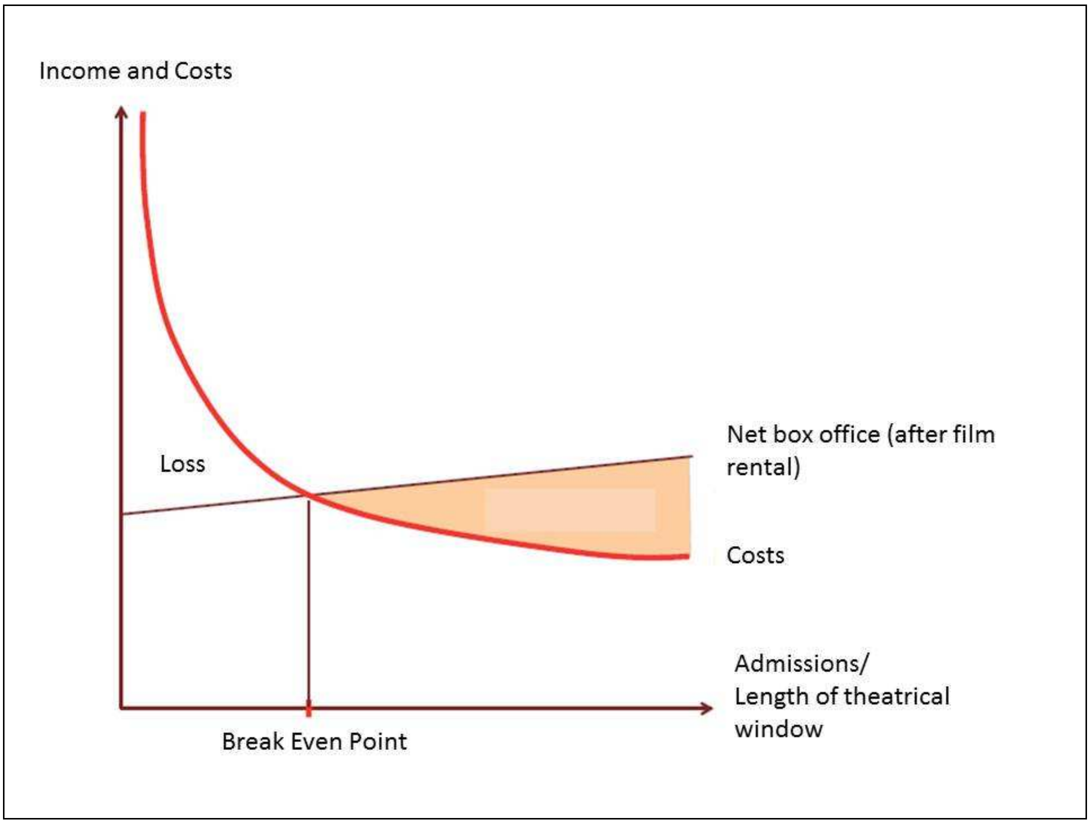
[4] European Audiovisual Observatory, *FOCUS 2011* - World Film Market Trends. Figures include 23 European countries. Available here: www.obs.coe.int/oea_publ/market/focus.html

[5] International Video Federation. The European Video Yearbook 2011. Page 6. Figures include 22 European countries analysed by Screen Digest.

[6] KEA study concerning the multi-territory licensing of audiovisual works in the European Union. Page 96 – last sentence. Furthermore: The role of marketing expenditures in the success of a film is a widely recognised, e.g. see Elliott, Caroline, Simmons, Rob, Determinants of UK Box Office Success: The Impact of Quality Signals, Review of Industrial Organisation, 2008, 33-2, pp. 93-111.

one of the most relevant guarantors for jobs in the European film industry. This contribution to EU sustainability and the EU growth agenda should not be underestimated in the context of the current economic crisis.

Profitability of a Cinema in Relation to Admissions/ Duration of Theatrical Window[7]



Digital Distribution and a "Digital Single Market for EU film"

Video on Demand is an emerging new market for films that has the technological potential to facilitate easier circulation of European films across borders. The latter has long been a key concern for the audiovisual industry and for policy makers alike.

Similar to all other stakeholders in the film value chain, cinema operators depend on the emergence of a legitimate and healthy VOD market given that overall revenues in home entertainment are in decline[8]. This is so, because continued decline in home entertainment revenues may have serious implications for the entire audiovisual ecosystem and for audiovisual production finance. If less resources are available to create high-quality content cinemas will feel the results, too.

UNIC therefore welcomes the Commission's ambitions to create adequate framework conditions for VOD. At the same time, we believe that the EC should take the VOD market for what it currently constitutes: VOD is one version market among several others (theatrical, Blu-ray, DVD, pay-TV, free-TV, etc.) that so far produces very moderate returns and does not fulfil the EC's ambitions of increasing cross-border

[7] Based on FNCF (2010), Le Livre Blanc des Salles Obscures, prepared by Altermind, Page 27. Accessible at: www.fncf.org (October 2011)
[8] IVF (2011). European Video Yearbook 2011. Page 9

demand for EU films. Moreover, the current VOD market is not integrated into the overall economic ecosystem of the film industry. Due to the fact that VOD operators so far don't contribute minimum guarantees they don't participate in the risk-sharing that characterises the sector. Should VOD markets continue to develop this may eventually change.

The above mentioned EC-commissioned study reconfirms these arguments:

- EU VOD markets are still in their infancy – they often attribute less than 2% of a film's total revenues in all film version markets. Most of the investments made into European audiovisual creation therefore depend on revenues from other version markets (theatrical, DVD, broadcasting, etc.).

- The existence of more than 700 VOD platforms across Europe in 2010 had not increased the levels of demand for EU films (national and non-national) on these VOD platforms when compared to theatrical exhibition. This highlights that the availability of non-national European titles on VOD does unfortunately not simply translate into cross-border demand. It makes the often neglected observation that in digitally networked and experience-based markets, such as the film industry, demand for any kind of product or service must be created by means of cost-intensive and localised marketing and adaptation. Consumer demand decides whether these investments into marketing and adaptation are made.

- The European film industry crucially depends on the ability of rights holders and their contractual partners to determine when and where content is exploited. Any potential remedy to market fragmentation in Europe can not be achieved by watering down copyright standards but must be achieved by more effective copyright enforcement and an optimisation of copyright management practices in relation to digital distribution. The latter should be initiated by the market given that VOD is such a nascent phenomenon.

UNIC would like to stress that it fully agrees with these findings. We therefore invite the European Commission to take a more evidence-based approach when forecasting the potential development of VOD and "a digital single market" for EU films. The European film industry is in the middle of a transition which is to some extend spurred by technological change. The exhibition sector has previously experienced similar market developments (introduction of TV, Video, DVD, etc.) and always used them to eventually strengthen its business model and its competitive position in the market place. We believe that this will also be the case in a future "all-digital" environment. Indeed, cinema exhibitors have arguably over the past 5 years invested more resources into the digital shift than players in other version markets, including those in VOD. Therefore, and because market developments are too nascent to predict the future trajectory of the film industry, we strongly oppose that governments set any regulatory standards that may promote certain version markets over others.

3. COMMENTS IN RELATION TO SPECIFIC POINTS RAISED

Most of our specific comments in relation to questions posed in the Green Paper are based on the observations above.

What should be the key priorities of the Commission?

For consumers and film companies to really benefit from the digital shift the film industry first and foremost depends on a robust policy framework that favours culture, creativity and investments into cultural and creative industries. In this context, UNIC particularly regrets that the Green Paper does not further specify how the EC will address the issue of film theft, given that the impact of piracy (whether online or offline) transcends all version markets and distorts commercial relations between industry stakeholders. VOD markets in Europe (and potentially cross-border demand for EU films) will only really take off when the high amounts of piracy are stopped by legislative measures at national and at European levels. As long as DVD revenues decline and VOD remains a marginal market – both are effects of the high levels of film theft – there is little incentive to invest into the development of new version markets[9].

At EU level, the Commission should promote more cooperation between internet service providers, other intermediaries and rights holders to ensure that levels of piracy are pushed to a minimum. Furthermore, it should look into the possibility of developing legislative instruments that make end-consumers that access content illegally more aware of the disutility such action brings to the entire audiovisual industry in Europe. In this context, UNIC would like to point out that film theft in cinemas by recording a film during the screening continues to be a serious concern for the entire industry. While cinemas and rights holders attempt to find market-based technological solutions to the problem, we would urge the Commission to also develop a position on the issue.

In relation to activities of the European Observatory on Counterfeiting and Piracy UNIC would like to underline the need for a robust methodology when assessing the impacts that piracy has on the film industry. Given that the assessment of the impacts of piracy will be conducted periodically, we find it important to develop a nuanced apporach that takes account of the particular circumstances of creative content sectors.

Finally, more awareness raising campaigns concerning the societal value of copyright and neighbouring rights are needed. Cinema owners are ready to cooperate with respective EU agencies and would welcome any campaign that may be rolled out in the future in this regard.

As regards to many of the ideas launched in the Green Paper UNIC believes that any future regulatory initiative of the Commission has to fully respect all copyright

[9] Example: According to the German copyright enforcement council GVU turnover in German DVD rental shops have increased by 28,9% since the closure of the illegal streaming website kino.to in June.

principles that are enshrined in the 7 European copyright directives as well as agreed in international treaties such as WIPO. These are:

- Contractual freedom – the right of rights holders to freely decide about the terms and conditions under which they wish to exploit their works
- Exclusivity – the right to grant exclusive exploitation rights (a right linked to contractual freedom)
- Territoriality – the right for the rights holder to decide on the geographic scope of a licence (a right linked to contractual freedom)
- Enforcement – the right to prevent by law unauthorised exploitation of copyright protected works

While it is out of the scope of this submission to examine in detail the impact that each proposed online licensing mechanism may have on the industry UNIC believes that rights holders should remain free to decide whether or not to take part in any collective copyright management mechanism that may be proposed by the legislator. This should happen on an opt-in rather than on an opt-out basis, i.e. rights holders should be able to take the decision to participate in or to reject a scheme before they are part of it.

As suggested in the Green Paper, UNIC would like to underline that there are few problems as regards the licensing of audiovisual rights for cross-border distribution as the producer constitutes a one-stop-shop. Most regulatory initiative in this regard is needed in other areas (see further below).

Finally, we wish to accentuate the fact that the mere availability of non-national European films in a specific territory – in cinemas or on any other media platform – does not directly translate into consumer demand for such content. To achieve their public policy objective of increasing cross-border trade of European films we therefore believe that governments in Europe, including the European Commission, should increase their film related support to more significantly benefit the fields of distribution/ marketing and consumption/ point of sale. As outlined above, in experience economies such as the film industry demand for products and services has to be generated.

Is a system based on territoriality in the EU appropriate in the online environment?

UNIC strongly believes that copyright territoriality enables the film sector to effectively and efficiently engage in all the value generating activities outlined in section 2 of this document. Moreover, we believe that the principle is also highly relevant to the online distribution of audiovisual works as distributors and media service providers have to be able to target specific linguistic and cultural markets in Europe. In this context, copyright territoriality is essential to safeguarding cultural diversity in Europe. A single European content license for online distribution might drive out smaller VOD operators and hamper the availability of European specialised content on future platforms. Such concentration might also reduce the negotiation power of independent rights holders that wish to make available their content on large multinational VOD platforms.

The territoriality principle has been enshrined in Article 5(2) of the Berne Convention, and in the seven EU Directives dealing with copyright and related rights. Several rulings of the ECJ reconfirm that film rights holders can grant licenses with territorial limitation[10]. The recent decision of the ECJ in the Premier League case reconfirms this in relation to creative works.

Finally, today nothing but consumer demand prevents a rights holder to grant a license on a Europe-wide basis. Copyright (including its territorial nature) is not the obstacle to the emergence of a single market for EU films. The main challenges are related to diverging consumer preferences along linguistic and cultural borders. These preferences do not necessarily change due to the advent of digital technology.

Are the current models of film financing and distribution, based on staggered platform and territorial release options, still relevant in the context of online audiovisual services?

Our position on the importance of releasing films according to sophisticated versioning strategies across Europe and in different media channels has been outlined above. We believe that such practice is vital to the success of the industry and of relevance to online distribution as it increases the overall revenues of the film sector.

In Europe, films get created and distributed on the basis of a complex patchwork of financing as the exercise of production and distribution is too costly and has too many risks attached to it to be borne by one entity. Distributors and broadcasters, both important investors into production, pre-finance the creation of a film by paying minimum guarantees against the exclusive right to exploit a title in different markets. They have little incentive to enter the VOD market given that the returns in VOD are far smaller than in theatrical distribution, broadcasting and DVD. VOD operators don't invest into production by paying minimum guarantees for similar reasons.

Furthermore, non-exclusive licensing deals for online distribution mostly occur in relation to back-catalogue content. They reflect the comparably small economic value of such content. Should the market share of VOD increase in the future, exploitation rights may be sold on an exclusive basis.

This illustrates that both versioning and investments in the film sector follow consumer demand and not vice-versa. Should such demand change, so will the commercial practices of the industry.

Should Member States be prohibited from maintaining or introducing legally binding release windows in the context of state funding for film production?

As illustrated above, UNIC strongly believes that maintaining an exclusive and extensive theatrical release window at the start of a film's release schedule is vital to

[10] In relation to the exhaustion rule regarding physical goods: See for instance ECJ 8 June 1971, Case 78/70, Deutsche Grammophon v. Metro, and ECJ, 18 March 1980, Case 62/79 Coditel I, paras. 15-17. Also: ECJ, 14 July 2005, C-192/04 Lagardère para. 46

the well-being of the European film industry and has positive economic knock-on effects on other version markets.

The practice of maintaining a staggered release schedule in relation to a film's exploitation in different version markets is common practice is all territories and primarily a result of consumer demand. As mentioned in the Green Paper, in some UNIC territories, governments regulate this media chronology and/ or tie public support for film production to a specific release schedule.

Film funds in EU Member States and regions regulate and support the film industry primarily for cultural reasons and due to the fact that most content watched in the market is not from Europe. The right to support cultural activities and cultural industries such as film is enshrined in the UNESCO convention on cultural diversity, which the European Union helped to develop[11].

In this context, UNIC believes that the decision of some Member States to tie their funding for film productions to certain release strategies are also based on cultural policy rationales. Cultural policy remains primarily in the remit of the Member States (Art. 107 TFEU (ex Article 87 TEC).

Disadvantages and advantages of harmonizing copyright in the EU via a comprehensive Copyright Code

For cinema operators there are two key domains in which further harmonisation would be desirable in relation to copyright:

First, UNIC proposes more transparency and governance rules for collecting societies:

Whereas it is a major characteristic and advantage of the film sector that most audiovisual rights are primarily licensed on an individual basis, this is, for example, not the case in music. Furthermore, several UNIC territories are commercial users of other collectively management remuneration rights (performers, actors, etc.)

In some EU countries, current collective rights licensing practices may therefore cause difficulties and may increase licensing costs. In accordance with the objectives outlined in the Commission's Digital Agenda for Europe and in accordance with the 2004 Resolution of the European Parliament on a Community framework for collective management societies, UNIC believes that increased transparency and governance of collecting societies would go a long way to easing licensing barriers and licensing costs. UNIC therefore favours the development of a European framework directive that promotes greater transparency and governance requirements of music collecting societies. In some EU countries this has already been achieved. Among other things, such directive would relate to:

- Disclosure of financial and operating results of societies
- Distribution and pricing policies in relation to rights holders and licensing partners (including management fees)

[11] Convention on the protection and promotion of the diversity of cultural expressions, Paris 20 October 2005.

- Exact scope of repertoire and applicable terms and tariffs

One example in this regard are music rights payments. The level of music rights payments made by cinemas is usually set at national level and varies from country to country. However, across most European territories the level of fees paid may be set rather arbitrarily and in a non-transparent fashion. The large variations in fee levels from territory to territory illustrate this. Music collecting societies don’t take into account investments of the film industry such as digital projection or the added value that 3D films bring to the cinema going experience. Especially returns related to the latter are not at all related to music and should not be part of any calculation on which licensing fees are based. However, unfortunately, the methodology used to determine levels to be paid are, in some countries, all but transparent and often based on the gross box office receipts of exhibitors. Introducing a EU framework directive on the matter would provide the level of efficiency and transparency needed to enable fairer negotiations between music collecting societies and commercial users, such as cinemas. In this context, UNIC believes that the European Union should get more involved in relation to how tariffs are established at national level in order to increase transparency, appropriateness, and enable fair negotiations, where necessary.

Secondly, harmonisation efforts regarding copyright enforcement, which is crucial to enable the development of a European VOD market and can ensure the functioning of the entire audiovisual ecosystem in Europe, need to be completed. The implementation of EU directives in relation to copyright enforcement varies greatly in Member States. Whether and how internet intermediaries should cooperate in the fight against piracy and how end-consumers are made to feel more responsible for the negative impacts of illegally downloading films is approached very differently in each Member State. This might eventually lead to a “race to the bottom”, where internet services relocate to countries with weak copyright enforcement policies. This would be contrary to the ambition of creating a single market.

Given the European Commission’s ambition to promote the development of a “digital single market” for films UNIC recommends that it:

- gets more involved in promoting knowledge exchange and cooperation between different Member States as regards the benefits of copyright enforcement and promotes strong enforcement policies at European and at national levels.
- Proposes legislation to harmonise criminal sanctions in relation to online copyright infringements at EU level.
- Commissions a study pertaining to the effectiveness of different approaches to limit piracy online in the Member States, including the French model, the Spanish approach and other currently emerging schemes.

Copyright enforcement is an international challenge in digitally networked media environments and the European Commission should take a stronger lead in fighting piracy.

Should there be an optional unitary EU Copyright Title?

UNIC believes that the idea of creating a unitary EU Copyright Title that would be voluntary and sit alongside national titles is rather unrealistic. This is also re-confirmed by scholars that have looked into this suggestion more thoroughly in the past[12]. The development of such title would require the reform of a myriad of territorial rules and commercial practices at national level. It would also require a complete overhaul of existing copyright laws in Europe and internationally. Given that there is little need for such title and in the light of the current political climate in Europe we suggest that the European Commission does not take on a project of such magnitude. Furthermore, from a legal standpoint, it is not clear to us that Article 118 of the Lisbon Treaty can be extended to include "copyright". While the Treaty of Lisbon was not meant to confer additional IP powers on the EU, Article 118 marks a statement of political intent and a commitment to achieving the Community patent.

What practical problems arise for persons with disabilities to have access on an equal basis with others to audiovisual media services in Europe?

While this question is primarily geared towards audiovisual media service providers in Europe (i.e. home entertainment) UNIC would like to state the following in relation to its own policy on disability and access.

In many UNIC territories, cinemas, along with other similar venues, are required by law to make their premises accessible to people with disabilities.

UNIC strongly believes that everyone has the right to enjoy the experience of seeing a film in a cinema theatre. Recognising the challenges that this presents in particular to disabled people, the cinema exhibition sector has made significant investment in improving access and facilities in cinema theatres.

As well as investing in physical improvements such a wheelchair spaces, wheelchair ramps and lifts, cinemas have also ensured that key staff are provided with the necessary training to understand the issues face by disabled people and to deal with problems where they arise.

For those with hearing problems, significant investment has been made in some territories in subtitled screenings and subtitling equipment.

For those with sight problems, similarly there has been investment in audio-description facilities.

All of these developments are positive, and the exhibition sector will continue to do all it reasonably can to ensure that disabled people are able to enjoy the cinema experience.

But inevitably there is a limit to how much each cinema can do to address issues of disability and access, and a point at which it is no longer financially possible to make

[12] See study of Prof. Bernt Hugenholtz for the EC Copyright Unit: IVR. The Recasting of Copyright and Related Rights for the Knowledge Economy. Page 27

changes. It should be for each individual cinema or cinema company to decide when that point is reached.

We look forward to working further with the Commission on getting its online distribution strategy for films in the European Union right. I would be happy to discuss any of the raised issues in person should you wish to do so.

With kind regards,

Jan Runge
Chief Executive
Union Internationale des Cinémas (UNIC)