CMBA
CreativeMediaBusinessAlliance

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CMBA response to the Green Paper on the online distribution of audiovisual works in the European Union: opportunities and challenges towards a digital single market

The Creative and Media Business Alliance (CMBA) welcomes the opportunity to offer written comments to the European Commission as part of the public consultation triggered by this Green Paper. We would like to divide our submission into five parts: (i) "General remarks", (ii) "Policy approaches to online licensing of audiovisual works", (iii) "Rights holders' remuneration for online exploitation of audiovisual works", (iv) "Special uses and beneficiaries", and (v) "Accessibility of online audiovisual works in the EU".

A. General remarks

The creative industries sector has seen a constant dynamic growth with a fast capacity of recovery from the global crisis. As consumers are at the heart of our businesses, we are continuously diversifying, multiplying and improving our services offer in order to meet the highest expectations. At the same time, this translates into growth for the EU economy as we generate significant revenues and employment. The Green Paper quotes "*3% EU GDP corresponding to an annual market value of 500 billion EUR and employing about 6 million employees.*"

It is a reality that all CMBA member organisations are **innovating** and transforming their business models and service offer by embracing the opportunities of the newest technologies in order to reach the widest public possible in the digital world with **professional content**, be it books, films, newspapers, music, films or TV programmes. We offer a wealth of **legal services** and professional content online which require significant financial investment, creative risk and long-term planning. Europe's digital competitiveness depends on the existence of an online level-playing field where **commercial freedom** is guaranteed, which allows parties to enter into commercial negotiations with a view to defining the most appropriate arrangement in each individual case

As creative and media industries, we generally support a **market-driven approach** for the exploitation of our rights and for licensing in particular. Contractual freedom in commercial transactions is thus of paramount importance for our sector. Digital distribution is complementing established forms of distribution and is always part of our business strategies. From a market perspective, it is necessary to have the freedom to choose when and how to make copyrighted works available to address specific needs and cultural differences of each local market, which multiplies consumer choice and addresses the substantial risks faced by experimenting on newer platforms. Digital technologies provide new and innovative ways to customise and enrich the offer for each market and meet consumers' demand. If our companies are to achieve their full potential in these new

technologies and consumer choice is to be maximised, **commercial freedom** must be preserved.

In this respect, the imposition of any form of compulsory licensing or extension of mandatory collective management in the online environment would adversely affect the value of copyrighted works, deter future investments in the production of high value premium content and act as a disincentive to making that content available through a variety of innovative business models. It would ultimately reduce consumer choice.

Furthermore, the introduction of a European copyright code or an optional unitary copyright title is very unlikely to produce the intended practical results and might in fact take decades to achieve. Copyright being a right of property, such proposals would raise a number of legal, competency and subsidiarity issues.

Finally, CMBA strongly believes that robust enforcement of copyright online in needed to further create growth in the DSM. There is an urgent need to create a level playing field and incentivise more legitimate players to enter the production and the distribution of creative content by making sure the rule of law is applied in the online environment.

B. Policy approaches to online licensing of audiovisual works

Question 1: "What are the main legal and other obstacles – copyright or otherwise - that impede the development of the digital single market for the cross-border distribution of audiovisual works? Which framework conditions should be adapted or be put in place to stimulate a dynamic digital single market for audiovisual content and to facilitate multi-territorial licensing? What should be the key priorities?"

As a preliminary remark, the CMBA would like to emphasise that the various sectors falling under the label of "creative media businesses" (music, film, broadcasting, publishing, games, etc.) all display clear specificities reflecting their long-term development as a result of a rich interplay between artistic creation, diverse cultures and consumer tastes. One should thus be wary of taking acquired wisdom from one sector to extrapolate to others.

The production and distribution of audiovisual works rest on the twin pillars of copyright and contractual freedom. Together, they form the springboard that enables innovative online services to be launched and hence the growth and development of legitimate offers to take place. In this respect, it is also crucial to understand that although international, EU and national laws recognise **the territorial nature of copyright, the territorial application of copyright does not in any way preclude, from a legal point of view, EU-wide or cross-border licensing models.**

Decisions relating to production, rights acquisition and distribution are of course of an eminently commercial nature and taken by the relevant rightholders and platform operators. These strategic choices are firmly linked to demand and economic viability. In this context, the further development of the "Digital Single Market" (DSM) should be more than just a slogan. In the audiovisual sector, it opens up tremendous opportunities for economic operators whose wishes are of course to distribute (i.e., to sell) their creative works to the widest audience possible. However, the completion of the Digital Single Market should under no circumstances be achieved at the expense of the **commercial freedom** to provide services, including on a cross-border basis.

The CMBA welcomes the Green Paper's aspiration to identify and deal with potential/real obstacles to the freedom to operate within the DSM and would like to submit some thoughts and suggestions in this framework. The single most important hurdle today on the path towards more cross-border offerings of audiovisual services is insufficient commercial demand to provide economically viable multi-territorial services (let alone pan-European ones). Keeping this in mind, European decision-makers seem to focus almost exclusively on copyright and measures to streamline rights clearance in the EU while leaving largely unchallenged the real legal and practical obstacles that exist to an even more dynamic development of online offerings of audiovisual works, such as:

- **Network congestion**: commercial services for the delivery online of audiovisual content are today mostly of standard definition content. With HD and 3D notably, more bandwidth is required to ensure quality of service (i.e., high speed and low latency). If online rampant piracy remains unaddressed, network congestion problems will continue to degrade until next-generation access networks are widely available. In Europe, the situation is exacerbated by the lack of single market for telecommunications. Its absence hinders competition and hence harms online businesses and consumers.
- **Unlawful behaviour**: widespread unlawful online activities consistently threaten the development of e-commerce. Public trust and engagement is essential to ensure that the Internet reaches its full potential as a means for legitimate commerce, among others in the audiovisual area. Victims of illegal online activities should not find themselves (as they too often do today) with little or simply no means of civil redress at all. Lack of respect for the rule of law in the online space only benefits those who use the Internet for unlawful purposes and who expect that in the present legal/technical/business environment, their identity is unlikely to be exposed.
- **Fiscal incoherence**: a level-playing field should characterize the offline world and the online environment, notably in the case of value-added taxes (VAT). Concretely, reduced VAT rates should apply for the delivery of online cultural products.
- **Payment systems**: efficient and trustworthy payment systems are needed online, notably (but not exclusively) in the case of audiovisual media services. Innovations should be encouraged (e.g., within the EU's Framework Programme for R&D) to facilitate the development and improvement of current payment systems through innovations facilitating, e.g., micro-payment. In parallel, more emphasis should be put on private-public partnerships to fight specific forms of cyber-criminality, such as credit card frauds and identity theft.

Question 2: "What practical problems arise for audiovisual media services providers in the context of clearing rights in audiovisual works (a) in a single territory; and (b) across multiple territories? What rights are affected? For which uses?"

Question 3: "Can copyright clearance problems be solved by improving the licensing framework? Is a copyright system based on territoriality in the EU appropriate in the online environment?"

The exclusive "right of making available right" defined by Article 3 of the Copyright Directive (2001/29/EC) is the driving force behind new digital platforms, including in the audiovisual sector. It applies to situations where a work is offered to the public so that members of the public may access the work from a place and at a time individually chosen by them. Offers of

content that are not interactive (e.g., linear broadcasting) implicate the overarching “right of communication to the public”.

In the audiovisual sector, the exclusive rights relevant for commercial exploitation purposes are generally centralized in the hands of the producer, which therefore acts as a form of one-stop shop for rights clearance purposes. As a result, copyright clearances issues in the AV sector are generally limited and part of the daily business of the sector. In this context, the CMBA submits that the substantive copyright law in place today provides the answers and should predict the outcome, assisted by a more rigorous regulatory environment for collective management organisations.

Question 5: “What would be the feasibility, and what would be the advantages and disadvantages of, extending the "country of origin" principle, as applied to satellite broadcasting, to online audiovisual media services? What would be the most appropriate way to determine the country of origin" in respect to online transmissions?”

When looking at the 1993 “Cable and Satellite” Directive, the Green Paper acknowledges that “more than fifteen years after the application of the relevant Directive, this approach [i.e., the country of origin (CoO) approach] does not seem to have led to a broad emergence of pan-European satellite broadcasting services”. The CMBA submits that this is a telling illustration of the fact that European customers above all wish to receive broadcasting services tailored to tastes, which are most often locally rooted. As a result, satellite broadcasting services that have really prospered are the ones that have catered to commercial demand. This demand has rarely been multi-territorial in kind, with the possible exception of some news and minority-language channels (see KEA study commissioned by the EC at http://www.keanet.eu/docs/mtl%20-%20full%20report%20en.pdf).

Leaving aside the limited practical usefulness of transposing a 20-year old system designed for analogue satellites to new online media services, it should also be pointed out that it would in addition raise serious legal issues. Indeed, what should be understood is that the transposition of the “Cable and Satellite” Directive’s CoO rule for “communication to the public by satellite” to the online world would potentially affect the exclusive “making available right” – introduced into EU law by Article 3 of the Copyright Directive and discussed above under Questions 2 and 3 – which constitutes the modern and reliable pillar upon which rests the very dynamic online market that the Green Paper so rightly and eagerly welcomes. It could notably have unintended consequences regarding enforcement actions against websites dedicated to facilitating or inducing piracy. Any potential limitation on the vitally important exclusive making available right would be damaging to the digital single market since it would de-incentivize rightholders who rely on it to drive new business models. It should also be recalled that the Copyright Directive clearly provides that the rights referred to in its Article 3 (incl. the “making available right”) “shall not be exhausted by any act of communication to the public or making available to the public as set out in this Article.”

Question 6: "What would be the costs and benefits of extending the copyright clearance system for cross-border retransmission of audiovisual media services by cable on a technology-neutral basis? Should such an extension be limited to "closed environments" such as IPTV or should it cover all forms of open retransmissions (Simulcasting) over the internet?"

As the Green Paper fairly acknowledges, collective management of rights is not a common feature in the audiovisual sector and tends to be limited to cross-border cable retransmission and the administration of some remuneration rights (e.g., private copy). As we understand it, this question queries whether it could make sense to extend the cable regime of mandatory collective exercise of rights into the field of online delivery of audiovisual content.

As a first point, it should be understood that the "cable regime" applies to closed, geographically defined environments. Audiovisual producers have the contractual freedom to license the original broadcaster directly for the said cable re-transmission service or to subject the collection of royalties from the cable re-transmitter(s) to a collective management organization (CMO). This mechanism has enabled cable providers in Europe to operate effective services and, in this well-defined context, it makes sense to treat similar platforms alike (this is already the case in the marketplace, e.g. for IPTV services).

The CMBA considers that the potential to "transpose" the cable regime to other forms of re-transmission services (i.e., functionally equivalent to cable retransmission) can only be envisaged in a way consistent with the principles outlined above. Hence, initial transmissions (e.g., on-demand services as per the making available right) could under no circumstances be included under the "cable regime". As to re-transmissions functionally equivalent to cable re-transmission, they should be fully respectful of the key principle of the 1993 Cable and Satellite Directive, namely that the re-transmitted broadcasting signal should be simultaneous, unaltered and unabridged. Re-transmission services deployed over the open Internet, which in many cases are inserting their own advertising in or around the broadcast channels they are streaming, should by definition not qualify under the terms of the CabSat Directive and would thus be subject to direct licensing.

Question 7: "Are specific measures needed in light of the fast development of social networking and social media sites which rely on the creation and upload of online content by end-users (blogs, podcasts, posts, wikis, mash-ups, file and video sharing)?"

The CMBA does not believe that the development of user-generated content (UGC) on social media/network sites raises any new issues in the context of this Green Paper. Regarding more general policy discussions around the topic of UGC sites ("mash-ups", "fair use", etc.) we would however like to draw attention to a previous reflection paper on this specific issue, which is available at http://www.cmba-alliance.eu/papers/CMBA_UGC_18July08.pdf.

Question 9: "How could technology facilitate the clearing of rights? Would the development of identification systems for audiovisual works and rights ownership databases facilitate the clearance of rights for online distribution of audiovisual works? What role, if any, is there for the European Union?"

The CMBA submits that "rights ownership databases" would only have limited value in the audiovisual sector since – as explained above – for the purpose of commercial exploitation,

rights are generally centralized in the hands of the producer, which is in a position to act as a one-stop shop for licensing purposes. In addition, such databases have some practical flaws and important legal constraints:

- They can easily become counterproductive because of the difficulty to keep them up-to-date, relevant and free from abusive practices.
- They should remain voluntary if they are to remain compatible with international norms, notably the Berne Convention.

As to "identification systems" in the audiovisual, the CMBA sees merit in their developments provided they meet some key conditions, such as width of coverage and cost-effectiveness. Two interesting concrete examples can be mentioned here, namely the ISO-sanctioned ISAN (International Standard Audiovisual Number – www.isan.org) and EIDR (Entertainment Identifier Registry – www.eidr.org), which was launched last year with the backing of Movielabs, Cablelabs, Comcast and Rovi.

Question 10: "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? What is the best means to facilitate older films which are no longer under an exclusivity agreement being released for online distribution across the EU?"

Question 11: "Should Member States be prohibited from maintaining or introducing legally binding release windows in the context of state funding for film production?"

The financing, production and distribution of audiovisual works in the European Union reflects an intricate network of market players – ranging from large companies to SMEs –, each specialised in specific areas. Considering the high level of upstream investment most often required in the AV sector, most European entities will seek to share, or outsource, the financial risk involved in audiovisual production and distribution. In the case of films, this is mostly achieved by licensing distribution rights by platform, language and/or territory to market players involved in the distribution and marketing of audiovisual content through the various existing channels of exploitation. Many of the commercial decisions relevant to this process have to be made at very early stages of the life cycle of an audiovisual work, not infrequently even before the actual shooting of the creative work. This process also has the merit to constitute an elaborate form of peer-review, where investment partners are attracted by the sheer creative force behind, and commercial potential of, a given audiovisual project.

The commercial freedom of market players/rightholders involved is a sine qua non for this system to function and revenues to be maximised in order to allow future re-investment, including as it pertains to the contractual choice and exclusive right to define the terms of distribution of a given audiovisual work (distribution channel, territorial scope, etc.). This commercial freedom facilitates the launch of innovative services – online services included – whether available nationally or on a multi-territorial basis. As explained under Question 1, audiovisual rightholders face no legal constraints should they wish to negotiate licenses covering several territories, linguistic options or platforms.

As to so-called "release windows", they remain an important feature of the film industry, whereby films are released in different formats in a sequential order. This media chronology has in fact been shrinking over time and is continuingly adapting to evolving market conditions. One characteristic that remains true is that the first theatrical release of a film still

is the springboard that most often determines how a film will fare through its life cycle. The CMBA submits that the contractual freedom to decide the timing for the release of films in various media platforms is a crucial characteristics of the film industry, both with regard to commercial exploitation and as a strategic means to secure the financing upstream of productions.

Furthermore, according to Article 8 of the Audiovisual Media Services Directive, the question of specific time scales for each type of showing of cinematographic works is a matter of agreements with the rightholders. The Directive was introduced in 2007 in an attempt to update EU broadcasting law for the online environment, so the relevance of its provisions on windows has been recently confirmed.

13. What are your views on the possible advantages and disadvantages of harmonizing copyright in the EU via a comprehensive Copyright Code?

14. What are your views on the introduction of an optional unitary EU Copyright Title? What should be the characteristics of a unitary Title, including in relation to national rights?

We would like to refer here to the specific comments we provided in 2010 as part of the CMBA's response to the European Commission's reflection paper on "Creative Content in a European Digital Single Market: Challenges for the Future", which remain valid (http://www.cmba-alliance.eu/papers/CMBA_RD_4Jan10_Final.pdf). The reflection paper examined the opportunity of adopting a "European Copyright Law" by means of a regulation in order "to create a more coherent licensing framework at European level" and it mentioned the possibility of using the new Article 118 of the Lisbon Treaty as a legal basis for this future legal instrument.

In the CMBA's view, it remains unclear whether the new Treaty confers specific competency to the EU in this regard, especially for copyright, since its Article 118 was drafted for industrial property purposes. Moreover, if a new regulation were to introduce a "Community copyright title" alongside national titles, it would clearly add a layer of complexity to the rights clearance process in the EU. As to the drastic option of simply replacing national titles by a European one, it sounds at best very premature and extremely complex to achieve since this option would require addressing not only issues related to exclusive rights and exceptions but a host of other complicated and potentially divisive issues. Not only does it remain unclear how these issues could be tackled at an EU level but it would fail to provide rapid, practical solutions which can best be reached by pragmatic, dialogued-based discussions.

C. Rights holders' remuneration for online exploitation of audiovisual works

15. Is the harmonisation of the notion of authorship and/or the transfer of rights in audiovisual productions required in order to facilitate the cross border licensing of audiovisual works in the EU?

The CMBA is of the opinion that the harmonization of the notion of authorship and/or the transfer of rights in audiovisual productions is not necessary in order to facilitate the cross-border licensing of audiovisual works in the EU. The partial harmonization has not caused problems in the exploitation of audiovisual and cinematographic works within the European Union. Any difficulties resulting from the different national solutions as regards ownership of

rights in audiovisual works are in practice overcome by contractual solutions and statutory rules on consolidation of rights.

16. Is an unwaivable right to remuneration required at European level for audiovisual authors to guarantee proportional remuneration for online uses of their works after they transferred their making available right? If so, should such a remuneration right be compulsorily administered by collecting societies?

17. What would be the costs and benefits of introducing such a right for all stakeholders in the value chain, including consumers? In particular, what would be the effect on the crossborder licensing of audiovisual works?

18. Is an unwaivable right to remuneration required at European level for audiovisual performers to guarantee proportional remuneration for online uses of their performances after they transferred their making available right? If so, should such a remuneration right be compulsorily be administered by collecting societies?

19. What would be the costs and benefits of introducing such a right for all stakeholders in the value chain, including consumers? In particular, what would be the effect on the crossborder licensing of audiovisual works?

20. Are there other means to ensure the adequate remuneration of authors and performers and if so which ones?

As a preliminary remark, we first wish to make it clear that we are fully committed to the notion that authors and performers of a collaborative work should benefit from its potential success. For this reason, we treat both the situation of authors and performers in the same single response. We embrace the notion of fair remuneration, which as a matter of fact is built in into the way companies operate as they produce films and television series that generate revenues shared by and with authors and performers who contribute to those works. However, we question how fair remuneration could be defined by EU law and more challenging still to contemplate exercise of such rights **only** through compulsory collective administration.

Regarding the need to create a new right to remuneration at European level for audiovisual authors it can be useful to take the Spanish example to illustrate how this kind of initiative can doublethat right to remuneration, which results in discriminatory practices which compromises the competitiveness of the (Spanish) audiovisual industry.

The Spanish Intellectual Property Law recognises certain rights of compensation that do not seem to exist in any other European countries, doubling the right to remuneration by granting an unwaivable right of remuneration for the mere reproduction of a phonogram and for the public communication of audiovisual works. As a result, collecting societies claim double payments for a single use of an audiovisual work. As in most cases performances of artists are hired and paid by producers/broadcasters, revenues from collecting societies for the public communication of their performance or interpretations made by broadcasters result in television operators paying double (or triple in case of audiovisual works) for the same provision. In fact, this double payment does not occur only in case of artists or interpreters (actors, singers, etc.), but also in every single case where television operators contract directly with authors for to create their works: writers, directors, composers etc.

Traditionally, the incidence of collective management/licensing in the audiovisual (AV) sector is very limited since exploitation rights are centralised in the producer who relies on the transfer (by law and/or by contract) of rights granted under copyright law to finance, produce and distribute AV works. Below are a few negative implications deriving from the proposed system of compulsory management of the right in question:

- National authors'/performers' collecting societies **would enforce such remuneration rights against new content online platforms directly and regardless of national traditions across the EU and contractual arrangements between producers and authors/performers**, including collective bargaining agreements, which may already remunerate through the subsequent payments for a wide range of different forms of exploitation.
- **The establishment of an EU-level "national" remuneration right would create a complex new layer of collective management. Smooth licensing and the uptake of online distribution services would be handicapped by such an additional layer of remuneration and administration, at the end of the day harming the interests of commercial users and consumers.**
- As the notion of "authors" differs across the EU, t**his raises the question of which authors would benefit from the statutory remuneration right**
- The proposal would translate into the establishment of a statutory remuneration right for the making available online of AV works. The end result would be a limitation on the author's exclusive right – and a reduction of the value of the rights the author can transfer to producers. **Besides, any action limiting the scope of the making available right could raise questions about the legality of the EU's implementation of the WIPO treaties**.

Additional protections that could benefit authors and performers could come in the form of an improvement in the regulatory environment for CMOs, one that establishes base-line requirements at EU level for accountability to members, transparency in tariff collections and distribution processes and a harmonized approach to licensing practices and terms.

D. Special uses and beneficiaries

Question 21: "Are legislative changes required in order to help film heritage institutions fulfil their public interest mission? Should exceptions of Article 5(2)(c) (reproduction for preservation in libraries) and of Article 5(3)(n) (in situ consultation for researchers) of Directive 2001/29/EC be adapted in order to provide legal security to the daily practice of European film heritage institutions?"

Question 22: "What other measures could be considered?"

The "Copyright" Directive (Directive 2001/29/EC) includes a long list of exceptions designed to cope with rapid developments in the digital environment. In line with the principle of subsidiarity, the CMBA submits that it allows Member States to reflect their own national traditions and is well-equipped to respond to various uses, interests and needs. The so-called "three-step test" included in Article 5.5 of the Directive has also proven to be a flexible and pragmatic legal tool for courts and legislators in the setting and interpretation of exceptions and limitations.

In the case of film heritage institutions, the CMBA agrees a clear distinction should be made between two aspects: (i) the conditions needed for bodies entrusted with a public interest missions to enjoy legal certainty in the fulfilment of their responsibilities and (ii) activities potentially going beyond a public interest mission. This is acknowledged by the Green Paper. In the case at hand, the public interest mission involves the collection, cataloguing, preservation, restoration and making accessible of films and other audiovisual works for educational, cultural, research or other non-commercial purposes.

The CMBA considers that exceptions and limitations contribute to the inherent balance of copyright law. Since the exceptions included in Article 5.2 and 5.3 of the "Copyright" Directive are optional in nature, the exact contours of exclusive rights might hence vary to some extent between Member States, while still being subject to uniform interpretation as per the Directive and relevant CJEU jurisprudence. Now subsidiarity and slight potential variations between EU countries would not warrant the transformation of optional exceptions into compulsory provisions. The CMBA would see the most merit in a simple exercise of clarification, made in light of Recital 44 of the Directive, of the policy goals behind the optional exceptions, which would certainly also be welcomed by film heritage institutions.

Stakeholder platforms have also continuously proven to be very effective at finding mutually beneficial concrete solutions, as notably illustrated in the film sector by the Framework Agreement reached by the International Federation of Film Producers' Association (FIAPF) and the Association of European Cinematheques (ACE). This sort of stakeholders' agreement is also encouraged by EU law.

E. Accessibility of online audiovisual works in the EU

Question 23: "Which practical problems arise for persons with disabilities to have access on an equal basis with others to audiovisual media services in Europe?"

Question 24: "Does the copyright framework need to be adapted to improve accessibility to audiovisual works for persons with disabilities?"

Question 25: "What would be the practical benefits of harmonising accessibility requirements to online audiovisual media services in Europe?"

Question 26: "What other actions should be explored to increase the availability of accessible content across Europe?"

The EU regulatory framework is well equipped with measures that support Member States in their national initiatives related to accessibility services in full respect of the proportionality and subsidiarity principles. From a copyright perspective, the 2001 Copyright Directive provides already for exceptions for disabled and we believe this is a balanced approach which should be kept in place. As regards media services as such, the AVMS Directive already promotes and puts in place guidelines for Member States to further develop their national frameworks. The implementation of the specific provisions at national level is yet to be produced by the Commission and we note that Member States are already on their way with the development of national plans to respond to the specific needs and demands which vary from country to country. Therefore, it would be completely unfounded to launch into new

discussions before we have had an overview of what has been achieved so far in practice under the current framework.

Moreover, official Commission data regarding the availability of audiovisual media services for the disabled such as subtitles dates from 2007. We would like to point out that subtitling is increasingly more available for example through a functionality of the set top box in countries with a tradition for dubbing like France, Italy and Germany. Audiovisual media services in general have seen a tremendous growth over the past few years. According to the European Audiovisual Observatory for instance, in 2009 more than 700 on demand audiovisual services were available in Europe compared to just 150 available in 2007, so a growth of 300% over only two years.

Technology advances fast and market solutions have proven efficient in addressing the needs for the disabled communities. More work is currently being undertaken and we believe that there is no need to intervene at regulatory level. Harmonisation at EU level may not prove efficient in this case as different disabilities have different needs and these need to be approached in a specific way.

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We thank you for your attention and remain at your disposal should you have any questions.

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*The Creative Media Business Alliance (CMBA – **Number 55791845397-85 in EU Registry of Interest representatives**) is an informal grouping gathering Europe's top media and creative businesses and industry associations. It was launched in November 2004 to give the European content and media sector a strong and united voice at EU level. The companies we represent invest creative efforts, time and financial resources in developing, financing and publishing a wide range of broadcasting, games, music, film, book, magazine and newspaper offers, including on the Internet.*