

**EU COMMISSION STAFF WORKING PAPER
“STRENGTHENING THE COMPETITIVENESS OF THE EU PUBLISHING
SECTOR”**

UK Government response

- 1) This document outlines the United Kingdom’s response to the Commission Working Paper published on September 22nd 2005. It has been produced by the UK Department of Trade & Industry (DTI) in consultation with the UK Department for Culture, Media & Sport (DCMS). These two Departments of State jointly sponsor the publishing sector in the UK.
- 2) The bulk of the response comprises a discussion of relevant competitiveness concepts for the sector as indicated under Question (1). However, we do make some comments under the other consultation questions. We also include some references to the UK Government’s recent response to the Commission’s Television Without Frontiers Discussion Papers (TVWF) where appropriate.
- 3) The response is made without prejudice to the position which the UK Government may adopt in relation to any forthcoming EU Directives affecting the EU publishing sector and/or related sectors. Comments made in the response are also offered without prejudice to the UK’s present responsibilities as President of the Council of Ministers, which we will continue to execute faithfully and in the manner expected of all Member States.
- 4) The UK Government welcomes the priority accorded to the publishing sector by the Directorate-General’s newly-created Task Force on the Co-ordination of Media Affairs. It also welcomes the commitment to maintaining the competitiveness of the EU publishing sector as a strategic media policy objective.

EU staff working paper

Question (1): Does this paper accurately describe the main indicators for competitiveness across different publishing segments?

- 5) We agree with the paper’s assertion that the shifting nature of the digital content landscape is having a profound impact on the definition of the sector. We also agree that the current NACE industrial classification no longer adequately reflects the economic situation of publishing in the EU. We endorse the creation of a high-level sector group for information and communication activities in NACE Revision 2. However, we are concerned about the plans to drop publishing from PRODCOM at the EU level when NACE 2007 is implemented. Retention would have enabled

the monitoring of outputs from the sector, a useful check at a time when producer business models (and therefore inputs) are in transition.

- 6) Convergence with adjacent sectors leads to “blurriness” at the edges of the sector. Problems with definition in turn make it more difficult to pinpoint relevant concepts of competitiveness for the sector – or, indeed, to determine the complete set of relevant sub-sectors.
- 7) A study commissioned by the UK government in 2002 (PIRA, DTI & UK Publishing Media, 2002) confirmed the difficulty of ascertaining relevant concepts of competitiveness for the sector. As well as problems of definition, paucity of data was also cited as a barrier. That remains the case in 2005.
- 8) The availability of comprehensive and robust statistical data for the sector is very patchy. Recent mapping work which we have done with the assistance of the main UK publishing trade associations reveals significant gaps. We are working with the trade associations on developing a more consistent baseline of key indicators for the sector, but clearly this will take some time to agree and introduce. Within-company differentiation between print and online media production costs is seen as a particular hurdle. From industry feedback, we know that many newspapers and journals do not at the moment, for example, separate out the costs of their journalistic staff who are servicing both their hard copy as well as their online media products.
- 9) The sector has expanded well beyond the traditional print media to encompass online and e-publishing and other audio-visual media. However, the move to digital content and digital distribution is just not a simple transfer from print to electronic formats as the paper seems to imply.
- 10) As the paper indicates, publishing within the EU is not a homogenous mass; it is difficult therefore to get a coherent picture across books, newspapers, online journals, magazines, etc. European Member States also vary widely due to differences in language, market size, population size and culture. All this adds to the complexity of capturing an accurate picture of the competitiveness of the sector. The paper seems to be seeking a common denominator across all markets; this may not be achievable or even desirable.
- 11) We agree that official statistics collected by EUROSTAT and by national-level statistical bodies in the EU will always struggle to keep pace with these sectoral changes. This poses a risk for the validity of any regulatory impact assessment based on this data. For this reason, it is important that any competitive analysis of the publishing sector should aim to capture this movement and the common issues and problems across the sector. In our 2002 study (PIRA, DTI & UK Publishing Media, 2002), the following factors were all seen as important contributors to the sector’s competitiveness: trade balance figures, productivity, price of

output, impact on the cultural and political life of the country, variety, innovation and quality. Ability to attract advertising revenue was also seen as critical. However, the UK study is now three years old, as is some of the data used in the Commission's staff paper. Some of the conclusions in the paper are therefore not as up-to-date or forward-looking as we would wish. For example, on the perceived lack of business models for online distribution; or on the absence of any references to mobile or broadband in the paper.

12) Given the fast pace of change in the sector, there is an urgent need for more regular, good quality, research and analysis into the sector to help inform government policy at both the national and EU levels. The UK government itself is currently considering commissioning further research into forward trends in the sector.

13) Many of the competitiveness indicators you suggest in the paper seem sensible. Below is a summary of those indicators which we would see as most relevant:

- ❑ Trade is a good measure: imports, exports, the trade balance and the relationship between production and consumption;
- ❑ Productivity also, if described as general value-added (GVA) per head, or GVA per productivity hour;
- ❑ Other economic indicators like turnover (as a percentage of total sales); employment (sector as a percentage of overall employment, as well as trends) and GVA (expressed for the sector as a percentage of country total) are also useful;
- ❑ Price of output;
- ❑ Measures of cultural and political impact: variety, innovation and quality of publishing; for example, numbers of enterprises; numbers of publications; circulation; demographics of readership (NB: these data may not be relevant for all publishing sub-sectors);
- ❑ Trends in advertising revenue, which remain crucial for some publishing sub-sectors;
- ❑ Costs of production and costs of online production, as the market moves increasingly to online distribution;
- ❑ Digital market indicators such as provision of digital content; revenue generated online (as a percentage of total revenues)
- ❑ ICT use by publishing businesses: useful to have sector-level information here so that comparisons can be made with other sectors;
- ❑ Innovation by publishing businesses will be an important indicator of sustainability for the sector: for example, as measured by the introduction of new online products;
- ❑ Value of royalties/licensing fees: better measures of copyright and licensing fees need to be established.

14) More generally, we believe it would make sense to try and increase the level of detail available in official statistics, so that different sub-sectors

like learned journals, regional newspapers, consumer magazines, etc, could be analysed separately. The various components of the publishing sector operate differently. A more comprehensive picture of the sector's competitiveness would be obtained by having data on the specific sub-sectors. Having a broad breakdown, as is currently the case at the four-digit NACE level, might fail to reveal important changes in specific industries. For example, Europe as a whole is a strong global player in the field of academic and learned journals. The paper suggests that academic journals can be categorized alongside periodicals and magazines, when in fact this may hinder proper analysis of the sector, given their respective distinctiveness and difference.

- 15) Overall, we would like to have seen more discussion of the contribution made by academic and learned journals to the sector in the paper, given their relative importance. Educational publishing and e-learning also warrant more attention.
- 16) Below we make some specific comments on the competitiveness indicators included in the paper in sections 2, 3 and 4.

Labour productivity

- 17) The paper acknowledges the difficulty in getting comparable data across EU countries. It is not clear, however, from the paper as to which productivity measures have been used in arriving at the data shown in the charts on pages 13, 14. Using the productivity measure, GVA per head, average annual growth for the UK publishing sector between 1998 and 2003 was over 5 per cent.
- 18) EUROSTAT figures confirm that the EU publishing industry contains a large number of small businesses and a few very large companies which dominate the sector in terms of employment and turnover. The UK itself is home to some of the largest publishing firms in the world.

Specialisation index

- 19) We are not sure which source has been used for the data shown in this section. Using PRODCOM data, the UK book specialization index figure for 2004 was 1.2; for magazines and journals, 1.05 and for newspapers, 1. UK journals and periodical publishing showed the most variation between 2001 and 2004.
- 20) We would agree that commonly-used languages provide competitive advantage for the sector. Language can also, however, provide protection from, and act as a barrier to, international trade.
- 21) The lack of within-company differentiation between print and online media production costs and outputs, which we know is a current issue for the sector, may skew specialization classification data. This poses a risk for placing too much reliance on the specialization index as a

measure of competitiveness in the short to medium term. However, once business models in the digital content environment are more evolved, this issue may be resolved.

Trade openness

- 22) For the UK in particular, we could not accept the assertion that EU publishing companies are not subject to international competition. Some sections of the UK publishing sector operate very much in a global marketplace and as such, are subject to intense pressures. They are also very export-oriented. For example, Reuters, although UK-based, focuses internationally, both in terms of its content gathering and its distribution. Ensuring fair and non-discriminatory market access overseas for their products remains a high corporate priority. The UK Government believes that open and sustainable markets are key to the EU's competitiveness agenda. Facilitating trade in goods and services across EU borders and beyond has the potential to benefit our businesses, consumers and employees alike.
- 23) Trade openness also needs to be seen in context. As mentioned earlier, the representation of the EU publishing sector will differ markedly from Member State to Member State due to differences in language, population size, culture, etc. For example, for book publishing, UK and Germany account for two thirds of the EU market, with the remaining 23 Member States contributing just a third.
- 24) Feedback from UK industry would also suggest that peer competition (as under the Lisbon Agenda) is important. For example, the performance of the UK publishing sector relative to the USA does matter in critical areas. Regulatory impact assessments need to capture these wider contexts.
- 25) The assertion about lack of international competition does not stand up in the context of the significant move to online publishing. Online publishing is truly global: consider the potential impact upon the publishing sector of the search engine giant Google's Google Print initiative. Online publishing also poses opportunities and challenges for print-based media companies across all EU Member States, including threats to advertising revenues (about which we say more under Question (8)) and opportunities for new revenue streams from paid-for content provision.
- 26) Another aspect of international competition facing EU publishers is the challenge from copyright piracy in developing countries. Publishers have to think globally in terms of policing piracy and in lobbying their governments over the creation of effective international IPR regulation and enforcement regimes through WIPO and the G8. As the paper says, we need to develop a better understanding of these globalization challenges facing our publishing industries, as well as of the new

intrusive technologies underpinning many of these changes and how they are affecting consumer behaviour.

27) Some other examples of the global reach of UK media companies would include:

- Guardian Unlimited – Nielsen net-ratings research for 2003 showed the Guardian newspaper’s website drew 49% of its audience from the Americas; 51% from Europe (source: http://www.neilsen-netratings.com/pr/pr_030311_global.pdf);
- Financial Times – around 70 per cent of this newspaper’s circulation is outside the UK (source: www.abc.org.uk, August 2005 ABC figures);
- The Economist – around 70 per cent of this periodical’s world-wide sales (excluding the Americas) were outside the UK (source: www.abc.org.uk, August 2005 ABC figures).

28) It is interesting to note that for UK newspapers, journals and periodicals, when you use PRODCOM data there appears to be very low trade openness. Using the calculation for this indicator, newspapers measure 0.01; journals and periodicals are at 0.1 using 2004 data. However, books produced a figure above 0.6 (or 60 according to the chart in the paper) each year between 2001 and 2004. This might call into question how closely export performance relates to academic journals, if they are classified as “periodicals and journals” rather than books. In the case of the UK, the value of book exports was around two and a half times that of the value of journal and periodical exports, although it is likely that academic journals account for a significant proportion of the latter.

29) Exports of rights is likely to be a separate issue. It is unclear currently how comprehensively these data are being collected at national level within the EU. This is a potentially big gap in export earnings information for the sector. We are not clear from Figure 8 (cf page 16 in the paper) whether rights sales have been included in this chart.

30) We would agree that the ability to attract inward investment by foreign companies is an important aspect of the sector’s competitiveness. Subsequent production by foreign affiliates in the UK is not currently captured in the UK’s balance of trade figures for the sector. Official export figures may therefore be underestimating the true level of international trade for the UK publishing sector. We are currently talking to our official statisticians about this.

Main cost factors

31) In Figure 10 (cf page 18), we note that some of the columns add up to more than 100. According to the 2003 PIRA report on the EU publishing industry, the underlying cost figures come from an informal survey, so they may not be as robust as the table suggests.

- 32) We would query the assertion (cf page 4) that no definitive business models yet exist for online distribution in the principal publishing sub-sectors. It is true that they are still evolving, but newspapers increasingly have digital editions e.g. FT.com, and many former print-based academic and learned journals are now electronic, or both hard copy and online. Indeed, European scholarly journals have been industry leaders in this area. Reuters, mentioned earlier, is a pure electronic distributor to its customers and wholesaling of newswires to electronic publishers is an increasingly important part of its business.
- 33) We would also question the statement (cf page 20) that distribution costs for electronic delivery channels are near-zero. This does not take into account the underlying incremental support costs of network maintenance, software licensing, or capital costs for ICT hardware and other infrastructure. Telecoms costs can also represent a significant investment for some online content providers. Other hidden costs for EU publishers could come from so-called “grey piracy” where international e-retailers may unwittingly be selling pirated EU IP content to EU consumers through third party e-distributors with lesser-known track records. The pirated content is often sold at a heavy discount, making it attractive to consumers. UK publishers regard this as an increasing area of concern.

Main revenue factors

- 34) We agree that some sub-sectors of publishing remain heavily dependent on advertising as a main source of revenue, and that this does make them very sensitive to advertising restrictions. We would very much endorse the need for exercising extreme caution before introducing any restrictions at the EU level on advertising. Any further restriction could have serious and negative effects across the sector at a time when alternative revenue streams and viable business models are still evolving.
- 35) Business models in the advertising sector itself are also undergoing a transition. We comment on this under question (8).
- 36) Advertising Association statistics for the UK suggest that regional newspapers and business magazines are most reliant on advertising. National newspaper advertising revenue, on the other hand, has fallen as a proportion of overall revenue from 60 percent in 2000 to 53 percent in 2004. Consumer magazines also get just over a third of their revenue from advertising in hard copy.
- 37) We agree that ensuring there is an effective and efficient copyright protection regime across the EU and internationally will remain a critical factor in determining the competitiveness of the EU publishing sector. It will be essential to underpin investor confidence in the digital content sectors. Copyright legislation must, however, be platform-neutral. Specific regulation for internet content would not be appropriate and

might be economically damaging while business models for the sector are still evolving.

- 38) We also agree (cf page 21) that copyright protection alone may not be sufficient to maintain the revenue bases of the sector and that new business models are needed for the digital content environment.

Structural change as a permanent challenge

- 39) We query (cf page 22) the assertion on readership of newspapers continuing to be dominated by the 45+ age group in future. Our data on the current readership demographic for the UK is more complex than this would suggest. According to the Advertising Statistics Yearbook 2005, the age profile of national newspaper readership depends on the type of product, with over half of mass market readership being under 45; mid-market dailies having nearly half of readers aged 55 and over and up-market broadsheets being somewhere in-between. We agree that falling circulation is probably more of an issue for newspapers, affecting all types of newspaper, though this may be being addressed by digital delivery formats; we anticipate younger consumers may take digital delivery formats in more substantial numbers.
- 40) Free daily newspapers in UK metropolitan areas – for example, Metro – are attracting young consumers, including students. Available data confirms that thirty-two per cent of the Metro’s readership in the UK is aged 15-24 (source: National Readership Survey 2004-05 quoted at <http://advertising.metro.co.uk/audience/ouraud1.htm>).

Question (2) Are there any further issues you would add in respect of publishing, notably with regard to the policy approaches set out in the Commission’s recent i2010 communication?

- 41) The i2010 context makes it all the more important to ensure this publishing study is based on a fully up-to-date concept of the publishing industry. As mentioned above, it is vital that future government policy is underpinned by up-to-date, good quality, research evidence. Given the pace of change in the sector, this does argue for more frequent research at national and EU levels than hitherto. Convergence for the publishing sector will entail more fundamental level change than just making a transition to similar products as now but in an e-format. We need to better understand the forward trends for the sector in this respect.
- 42) The representation of the publishing sector across EU Member States differs markedly from some countries to others, as mentioned above in our earlier comments. Homogeneity of approach in terms of policy for the sector across all 25 countries will therefore always face obstacles and may be unwise. We therefore welcome the Commission’s emphasis in recent i2010 communications on Member States retaining flexibility at the national level to address national circumstances, whilst recognizing the need to agree more focused, co-ordinated and holistic

ICT policy goals. As the Commission will be aware, the UK Government's recent response to the Commission's Television Without Frontiers Discussion Papers endorsed the need to reconsider the framework of EU broadcasting regulation in the light of the changes in the digital content sectors.

- 43) We also endorse the need to continue to involve industry and other stakeholders in an effective dialogue on these important issues. For example, we are aware that UK industry has some concerns over what they see as potentially contradictory positions being taken by different areas of the Commission on regulation affecting the digital content sectors. The potential withdrawal of the sui generis right for databases versus the perceived lack of support on addressing the sector's needs on Rome II has been cited to us as a case in point. The copyright and competition implications of the i2010 initiative on digitising the European cultural heritage are another. It will be vital to closely involve European publishers in the 2006 review of EU copyright rules.
- 44) On the call for stakeholders to identify new business models for the sector, we would recommend drawing on the significant experience of the European academic and learned journals sub-sector in this regard.
- 45) Another opportunity for enhancing the competitiveness of the sector under the aegis of i2010 lies with innovation through collaborative R&D between the EU research base and industry. Research on technologies around aggregation, search, personalization and navigation of online content will help make digital content more accessible and attractive to the consumer. The use of digital object identifiers, or Dols, in tagging and tracking the movement of chunks of content is one such example. As well as enabling the mining of content from backlists to create new revenue streams for publishers, Dols have the capacity to improve copyright protection by generating audit trails for content. We are aware that some UK publishers are actively exploring the use of Dols in these respects and we hope to encourage more to do so under the auspices of the DTI Technology Programme.
- 46) Sustainable development is also a relevant issue under i2010. We endorse working with and encouraging the publishing industry to promote sustainable development across the sector. We would also encourage the publishing industry to work together with its trade associations in sharing best practice in sustainable development; in recognizing the benefits of sustainable development for small publishing companies and in underpinning sustainable development strategies through publishes strategies.

Question (3) Are current industry structures across all segments likely to survive the transition to electronic value chains? What are the major barriers and threats to publishers during the transition? What are the opportunities for publishers arising from new information and communication technologies?

- 47) The question suggests an incremental rather than a fundamental-level change for the sector as a result of the move to online and other emerging digital content platforms such as mobile, computer games, etc. The UK Government believes convergence and the impact of intrusive technologies upon consumer behaviour are likely to lead to fundamental changes in the value chains for the sector. Hence the importance of conducting more good quality research on forward trends for the sector, as mentioned earlier in this response.
- 48) During this transitional phase, new innovations and new business models must be allowed to emerge without undue restriction from government. Blogging, for example, is not mentioned in the main text of the Commission's Staff Paper, yet recent studies show that 31 per cent of 14-21 year olds with a web connection at home have launched their own personal website or blog (source: Media Guardian, The Guardian, 7th October 2005).
- 49) Opportunities for publishers in these new environments would include the capacity to exploit their trusted brands across different media platforms, potentially attracting new audiences. The threats to publishers will be three-fold. First, the risk of government introducing premature regulation for the sector hindering the development of new business models and restricting innovation. Second, the market must develop to further attract and retain younger audiences. For example, a recent poll for The Guardian newspaper (which can be found at <http://media.guardian.co.uk/newmedia/comment/0.7496.1587108.00.html>) found only ten per cent of 14-21 year olds said they used the web to keep up to date with news and current affairs. Third, the potential erosion of the value of intellectual property, if not effectively licensed and authorized for use, could pose a major threat to the publishing sector.

Question (4) How will business models evolve and how far will Digital Rights Management systems be essential for their successful implementation?

- 50) This is a difficult question to answer with certainty, for reasons outlined earlier in this response. Leveraging brands across multiple platforms will be part of the answer. The nature of advertising is already changing to reflect the move to online. This is impacting adversely on the advertising revenues of more traditional media such as television, which is already having to contend with audience fragmentation as a result of multiple channels and increasing usage of personal video recorders (PVRs), etc. We say more about advertising under question (8) below.
- 51) Protection of intellectual property through copyright regulation and enforcement as well as DRM will be crucial to this exploitation of content. In principle, we think DRM is a good way to enable legitimate access to content while protecting the author's rights. However, it is not

a panacea: DRM's success will depend on its application. Ultimately, it is for the market to decide the best way to apply DRM systems.

Nature of the link between diversity of ownership and diversity of content

Question (5) How far is there tension between the need for open outcomes in economic terms at a time of rapid technological change and the political desire to support democratic values including diversity?

- 52) We are not quite sure whether this question is seeking feedback on media pluralism issues or on the scope of government's regulatory remit for the sector. Media pluralism has an important role in underpinning freedom of expression and in ensuring that the media reflect the range and variety of views that need to be heard in a democratic society. In the UK, we have considerable plurality of ownership of both the electronic and print media. Helping to ensure media plurality is an important and established feature of both the UK and EU merger control regimes.
- 53) Tensions can often occur because regulation can be slow and unwieldy for this fast-moving sector. Any political desire to support democratic values needs to be expressed in technology-neutral terms. For example, on universal rules against incitement to racial hatred, or against child pornography. The UK Government's recent response on TVWF highlighted the need in a multi-channel, multi-platform, environment, to understand what future regulation of the broadcasting sector would be trying to achieve.
- 54) DCMS has a stated objective of enhancing access to culture. An important aspect of this is making cultural organisations' collections available online. Many museums and galleries, libraries and archives in the UK have begun to digitise their collections and to make them available online. As a result of this, DCMS's Culture Online programme has been able to use some of these materials to produce projects aimed at widening access to culture, particularly by hard to reach groups.

Question (6) How far is diversity of content and ownership likely to be self-sustaining in fully electronic markets, given for instance lower entry barriers to citizens' direct participation (e.g. blogs)?

- 55) We have already commented above (cf response to Question (5)) on the issue of media pluralism. We agree that the impact of intrusive technologies upon consumer behaviour and other forward trends for the sector need urgent further research. Individual consumers as the new publishers do face lower barriers to entry for producing material. However, there are much higher barriers for establishing a reputation as a trusted source; hence our earlier comment under Question (4) about leveraging of trusted brands

Question (7) In converging markets, from the perspective of publishing, what approaches would you suggest for co-existence between the two different traditions of regulated, licensed broadcast media and unlicensed press?

- 56) We are assuming that the question is also referring implicitly to co-existence with (unlicensed) internet as well as unlicensed press. We have made a number of comments about the importance of convergence earlier in this response as has the UK Government in its recent response to the TVWF Discussion Papers.
- 57) In summary, the UK Government's view is that these changes are so fundamental to the future of these sectors that it might be preferable to start by focusing on what content needs to be regulated, rather than by looking just at the technical parameters of the platforms or services over which it is delivered. That might lead to a system in which the EU would effectively be inviting service providers to improve uptake of their product by subscribing to a co-regulatory system (preferably under separate instruments rather than one directive) of age banding to enable viewers themselves to regulate what they and their families watch, listen to and read.

Advertising: integrated media policy

Question (8) In relation to advertising regulation, what are your reasoned preferences in relation to the different instruments available, voluntary self-regulation, co-regulation and statute law?

- 58) There is a potentially serious negative effect in imposing any new and complex rules on the emerging digital content sectors while business models are still evolving. Advertising on "non-linear" services is likely to require less consumer protection because consumers will have for the most part specifically sought out these services. The general criminal law in each Member State of origin ought to apply to its contents.
- 59) Self-regulation in our view remains the most flexible approach to policing advertising in a fast-moving environment. We advocate a system based on the British Advertising Standards Authority (ASA) system, set up 40 years ago by the British advertising industry. In this respect it is the longest-established advertising self-regulatory system in Europe. It is also well funded and very well-respected as an exemplar in Europe.
- 60) The Advertising Standards Board of Finance (ASBOF) established a model for funding self-regulation, which provided a crucial element of independence in decision-making by divorcing individual funding contributions from the work of the complaints-handling body. It is a model that can be replicated internationally.
- 61) We have mentioned earlier in this response the continued reliance of some of the publishing sub-sectors on advertising. Fragmentation of

audiences is threatening to erode the advertising revenues of more traditional media such as broadcasting and magazines. A recent study by the Internet Advertising Bureau, PriceWaterhouseCoopers and the World Advertising Research Centre (IAB/PwC/WARC, September 2005) confirmed not only the significant growth in online advertising - up 62 per cent in the first six months of 2005 - but that this growth was also at the expense of more traditional media such as television. Noticeable in the UK has been a recent flurry of acquisitions by UK regional newspaper groups of online recruitment websites in response to the rapid shift from print advertising to online. Online recruitment advertising was said to have shown the biggest increase of all online advertising, according to the IAB/PwC/WARC study, a rise of 80 per cent in the first half of 2005 to GBP 96.6 million..

Question (9) From the perspective of publishing, what are the main issues that an integrated media policy – ie one that covers all media sectors – should address?

- 62) Some of the key elements of an integrated media policy in our opinion would be:
- ❑ Technology-neutral regulation;
 - ❑ Solid evidence base (e.g: of harm to be prevented) including good quality, frequent/regular research for these fast-moving sectors;
 - ❑ Thorough impact assessment of costs/benefits;
 - ❑ Clear and effective protection of intellectual property in a global context;
 - ❑ The impact of globalisation itself upon all media sectors;
 - ❑ How to enable innovation - including being careful not to restrict the emergence of new business models and new markets; embracing the positive aspects of new technologies;
 - ❑ Better understanding of changing consumer behaviours as a result of the new intrusive technologies, including where government policy and regulation will and will not add value.