


screenrights

The Audio-Visual Copyright Society

29 July 2004

Ms Susan Sullivan
 Adjudication Branch
 Australian Competition and Consumer Commission
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 Dickson, ACT 2602

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Screenrights is the trading name of
 The Audio-Visual Copyright Society
 Limited ACN 003 912 310
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By facsimile: 62 43 1199
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Dear Ms Sullivan,

**Re: Applications for Authorisation Nos A90918 to A90925
 Australasian Performing Right Association Limited (APRA)**

Further to your letter of 30 June 2004 and our recent telephone conversation agreeing to extend the time for Screenrights to lodge any submissions concerning the above applications lodged on behalf of APRA, we comment as follows:

Audio Visual Copyright Society Limited trading as Screenrights (Screenrights) is a copyright collecting society representing the owners of copyright in audio visual works. It is a declared society under Parts VA, VB and VC of the Copyright Act to administer statutory licensing schemes in respect of educational copying and communication and retransmission of free to air broadcasts by pay television operators respectively and also administers voluntary licensing schemes in various territories throughout the world.

Screenrights strongly supports the collective administration of copyright through non-profit collecting societies such as APRA and Screenrights, which provides a clear public benefit to consumers in the licensing of rights in circumstances where they would not otherwise be capable of administration by the copyright owners on an individual basis.

In relation to the current applications for authorisation lodged with the Commission on behalf of APRA, Screenrights works with APRA (and AMCOS) to assist in identifying music copyright owners in programs copied and communicated by Screenrights' licensees. Screenrights distributes the royalties in question to APRA (or AMCOS), which in turn allocates those royalties to its members.

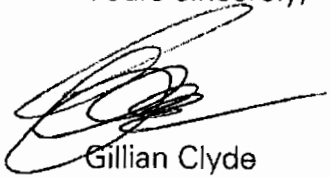
Screenrights has confidence in APRA's systems and processes in that regard and will continue to work with APRA in this manner in the future (also in respect of the retransmission system).

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Screenrights therefore supports APRA's applications for authorisation from the ACCC to continue its arrangements for the acquisition and licensing of the performing rights in the APRA music repertoire and the distribution of royalties to its members.

Please do not hesitate to contact me on Ph(02) 9904 0133 should you require any further information in this regard.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gillian Clyde', written over a horizontal line.

Gillian Clyde
Corporate Counsel