screenrights

25 January 2012

Mr David Hatfield Director Adjudication Branch Australian Competition and Consumer Commission GPO Box 3131 Canberra ACT 2601

Dear Mr Hatfield

Viscopy Limited and Copyright Agency Limited (CAL) application for authorisation A91285/86-interested party consultation

Thank you for your letter of 16 December 2011 regarding the above application, and asking for submissions.

Screenrights is a member of the Australian Copyright Council which we understand has made a submission of behalf of its members, including Screenrights dated 24 January 2012. Screenrights supports the views expressed in the Council's submission.

Audio-Visual Copyright Society Limited trading as Screenrights is a non-profit copyright collecting society representing rightsholders in film, television and radio. Screenrights has over 3,300 members in 59 countries.

Screenrights administers a range of collective licences relating to use of audiovisual material, including educational use of broadcasts, government copying of broadcasts and retransmission of free to air broadcasts.

In relation to the application lodged with the Commission on behalf of Viscopy and CAL, Screenrights works with Viscopy to assist in identifying artistic works rightsholders in programs copied, communicated and retransmitted by Screenrights' licensees. Screenrights also works with CAL collegiately on common areas affecting our respective members and stakeholders.

Screenrights supports the application concerning the proposed Service Agreement between Viscopy and CAL, with the intention of achieving greater efficiency of services and consequent benefits to their respective members.

Please do not hesitate to contact me should you require any further information in this regard.

Yours sincerely

Simon Lake Chief Executive