



screenrights

The Audio-Visual Copyright Society

SCREENRIGHTS SUBMISSION TO THE HOUSE OF REPRESENTATIVES STANDING COMMITTEE ON LEGAL AND CONSTITUTIONAL AFFAIRS

INTRODUCTION TO SCREENRIGHTS

Screenrights (the trading name of the Audio-Visual Copyright Society Limited) is the copyright collecting society representing the interests of owners of copyright in audio-visual works, including film producers and distributors, scriptwriters and music copyright owners.

The Society is declared under section 135P, Copyright Act 1968 ("the Act") to administer the scheme in Part VA of the Act creating a statutory licence for the copying of sound and television broadcasts by educational institutions. As well as administering this scheme, Screenrights provides other services to owners of copyright in audio-visual works both in Australia and overseas. These include the collection of royalties for broadcast copying by New Zealand educational institutions, and collections from overseas cable retransmission and home copying schemes. An overview of Screenrights history, role and microeconomic impact is attached as Appendix A.

There are currently 1146 members of Screenrights, located in over 40 countries. A list of members is annexed to this submission as Appendix B.

Importantly, Australian broadcasters are members of Screenrights and receive royalties generated under the Part VA scheme in their capacity as owners of underlying rights in certain cases. This submission does not purport to represent the views of those members. Screenrights understands that Australian broadcasters are making their own submissions to Government on the retransmission issue.

THE RETRANSMISSION COALITION

In 1998 the Retransmission Coalition was formed. The members of the coalition are:

- Screen Producers Association of Australia
- Australasian Performing Right Association
- Australian Film Commission
- Australian Screen Directors Association Collecting Society
- Film Australia Ltd
- Australian Writers' Guild
- Australian Film Finance Corporation Pty Ltd

Screenrights has been expressly authorised to make submissions to Government and to negotiate with ASTRA on behalf of the Retransmission Coalition members. This submission is made with that authority. Screenrights in its own right, and on behalf of the Retransmission Coalition,

congratulates the Government on putting forward the retransmission reform contained in schedule 1, item 200 of the Bill ("Part VC - Retransmission of free-to-air broadcasts"). This proposed reform will inject fairness into a *Copyright Act* which hitherto permitted pay television operators to make a free commercial use of copyright owners works, contrary to Australia's international copyright obligations. We applaud the Government for this.

SCREENRIGHTS IN THE HISTORY OF RETRANSMISSION LAW REFORM

Screenrights has been an active participant in the law reform process in respect of both the Copyright Act and the Broadcasting Services Act. A summary of Screenrights participation in the law reform process follows:

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|----------------|---|
| 1990 to 1996 | Numerous submissions to the Federal Government, supporting the introduction of a statutory licence to remunerate underlying rights owners for the cable retransmission of free to air broadcasts of their works, in line with Australia's international obligations. |
| 8 May 1997 | Participation in round-table Meeting with the Department of Communications and the Arts regarding possible retransmission legislative models |
| 29 May 1997 | Written submission to the Department of Communications and the Arts regarding three possible retransmission models |
| ** June 1998 | Written submission to Senate Committee on Environment, Recreation, Communications and the Arts regarding the retransmission amendments to the Broadcasting Services Act |
| 21 August 1998 | Attendance before the Senate Standing Committee on Environment, Recreation, Communications and the Arts to give oral submission regarding the retransmission amendments to the Broadcasting Services Act |
| ** April 1999 | Written submission to Attorney-General's Department and the Department of Communications, Information Technology and the Arts regarding Digital Agenda Bill Exposure Draft provisions, including a proposed alternative legislative model agreed between Screenrights and ASTRA |
| ** May 1999 | Written submission to the Department of Communications, Information Technology and the Arts regarding the Retransmission and Digital Broadcasting Issues Paper |
| ** August 1999 | Written submission to the Department of Communications, Information Technology and the Arts commenting on the Discussion of Options Paper regarding Retransmission and Digital Broadcasting |

Significantly, in respect of the retransmission provisions contained in the Exposure Draft of the Digital Agenda Bill, Screenrights and the Australian Subscription Television and Radio Association ("ASTRA") arrived at a joint

position in respect of a preferred legislative model for a retransmission scheme in the Copyright Act. That model, derived from the existing Part VA Scheme, was substantially adopted within Part VC of the Digital Agenda Bill introduced into Parliament on 2 September 1999.

However, one important aspect of the Screenrights/ASTRA agreed position was not adopted within Part VC of the Digital Agenda Bill. It is this aspect which Screenrights wishes to focus upon in this submission.

MULTIPLE DECLARED SOCIETIES AND THE RETRANSMISSION PROVISIONS

Under the current draft for the Attorney-General to declare multiple bodies to administer the retransmission scheme. The critical provisions read:

135ZZT Collecting societies

- (1) Subject to this section, the Attorney-General may, by notice in the *Gazette*, declare the body named in the notice to be the collecting society for all relevant copyright owners, or for such classes of relevant copyright owners as are specified in the notice.
- (2) Where the Attorney-General declares a body to be the collecting society for a specified class of copyright owners and subsequently declares another body to be the collecting society for that class of copyright owners:
 - (a) the first-mentioned collecting society ceases to be the collecting society for that class of copyright owners on the day on which the subsequent declaration is made; and
 - (b) any remuneration notice given to that collecting society ceases to be in force to the extent to which it relates to relevant copyright owners included in that class of copyright owners.
- (3) If the Attorney-General has declared a body to be the collecting society for a specified class of copyright owners, the Attorney-General may refuse to declare another body to be the collecting society for that class of copyright owners unless satisfied that to do so would be in the interests of those copyright owners, having regard to the number of members of the first-mentioned society, the scope of its activities and such other considerations as are relevant.

This represents a significant difference to the way in which Screenrights currently administers the Part VA statutory scheme. It gives rise to the possibility of there being a plurality of declared societies representing copyright holders according to right, subject matter or nationality. In the retransmission context this presents several obstacles to the efficient administration of the retransmission right.

(i) Duplication of Expenses - Natural Monopoly

Screenrights submits, that the reasoning applied to APRA' s activities by the Australian Competition Tribunal applies equally to Screenrights in the retransmission arena. The market for licensing pay television's retransmission of copyright material contained in free-to-air broadcasts is a natural monopoly - a market that can be served at lower cost by having only one supplier than many suppliers. This is because:

"many of the aspects of copyright enforcement contain a high proportion of fixed costs [including] establishment of the systems for monitoring users and registering works. By contrast, once these system are in place, the incremental cost of accepting another ... new work into the system is insignificant. If these fixed costs are high enough over the relevant output range, then the average costs of enforcement will also be declining and the lowest costs are incurred by society being served by a single collecting society".¹

Screenrights submits that administering a retransmission statutory licence fits almost seamlessly into Screenrights current range of activities - including those under Part VA of the *Copyright Act 1968*. Thus, many of the fixed costs which a retransmission statutory licence entail have already been borne by the relevant copyright owners through Screenrights past administrative expenses.

To have these costs born again by multiple different societies is contrary to the sentiment expressed by the Australian Copyright Tribunal. Assuming two or more societies are declared under 135ZZT, this will create duplication of expenses occasioned by the separate administrations. This inefficient duplication of expenses, in turn, may put inflationary pressures on the retransmission licence fees and/or result in lower net distributions to rightholders.

(ii) Creation of Multiple Monopolies

The multiple declared society model does not infuse "competition" into administration of the licence, except in so far as societies may be said to compete between themselves to increase their relative shares of the retransmission royalty base.

What the multiple society model does, in fact, is impose multiple monopolies. If several societies administer several discrete categories of subject matter or rights, each of those societies is a monopolist with respect of those right or subject matter.

Screenrights submits that a statutory licence of this type lends itself readily to one point of administration which is moulded to meet the requirements of the activity for which the licence was created; retransmission. In the US, the Copyright Office singularly fulfills this function in respect of the retransmission right.

¹ *Re Applications by Australasian Performing Right Association [1999] ACompT 3*, quoted at paragraph 287.

(iii) Multiple Negotiations and Tribunal Determinations

A consequence of multiple societies administering the retransmission statutory licence, is that ASTRA's members must engage in multiple negotiations with each society as to payment of equitable remuneration. This may translate to multiple Copyright Tribunal determinations in respect of each failed negotiation.

The Digital Agenda Bill has inserted a strict record keeping requirement upon the pay industry. This, too, is to be determined by agreement or by Copyright Tribunal determination. In the multiple society scenario, this could create a genuine administrative burden with different societies seeking different types of records to be kept.

(iv) Possibility of Endless Judicial Review

Under the current drafting, any declaration by the Attorney-General under 135ZZT gives rise to a likelihood of that decision being challenged under the *Administrative Decisions (Judicial Review) Act 1977*. Such litigation could drag on over years, create an air of uncertainty over the retransmission licence and hamper the Government's policy objectives. It is Screenrights belief that a single society model substantially reduces the possibility of such a scenario unfolding.

CONCLUSION

Screenrights is of the view that one society dealing with all rights holders is the best way to administer the retransmission right. Such a society should be under the public scrutiny of the Parliament and have high prudential requirements imposed upon it. Such a society should lose its declaration if it fails to perform.

Screenrights would seek such a declaration as the collecting society administering the scheme. We regard this as appropriate because:

- Screenrights holds the declaration of the Attorney-General under Part VA of the Copyright Act and already meets the criteria for declared societies.
- By reason of that declaration, Screenrights represents all classes of copyright holders (in film, music and script) pertaining to the underlying works contained in the broadcasts. Screenrights is the only body in Australia which comprehensively represents the interests of the relevant underlying rights holders affected by retransmission.
- Screenrights is affiliated with international audio-visual collecting societies which collect and allocate royalties from retransmission operating in Europe, Canada and the United States. Screenrights is represented on the Board of Directors of AGICOA (the Association de gestion internationale collective des oeuvres audiovisuelles), the body responsible for the trans-national coordination of retransmission schemes across Europe.

- An agreed position between Screenrights and ASTRA has been instrumental in shaping the retransmission provisions contained in the Digital Agenda Bill.
- Screenrights has the experience, resources, rights management information and requisite access to transmission data to be in a natural position to efficiently administer any retransmission scheme as soon as legislation is enacted . We are confident that our administrative expenses will be reasonable both at start-up and over time.

Screenrights welcomes any opportunity to put any further submissions (in writing or in person) the Committee may find to be of assistance.

Simon Lake
Chief Executive

30 September 1999

APPENDIX A

The Background of Screenrights

1. History of Part VA and Screenrights

History of Part VA

- 1.1 In 1981 the Attorney-General, Senator Durack, initiated a departmental review of the audio-visual provisions of the Act, including educational copying. The departmental review resulted in the publication of an Issues Paper in 1982.
- 1.2 In 1985 the Attorney-General's Department put forward detailed proposals for a statutory licensing scheme to enable educational institutions to copy audio-visual material which was not available commercially.
- 1.3 These proposals were supported by tertiary institutions and copyright owners but opposed by school representatives. In these circumstances, the Government decided not to proceed with any reforms in the area of educational copying at that time.
- 1.4 In 1986, Senator Durack moved an amendment to the *Copyright Amendment Bill* 1986, which proposed that copyright in television and sound broadcasts in which copyright subsists in the Australian Broadcasting Corporation or the Special Broadcasting Service would not be infringed by the making of copies by educational institutions for educational purposes. This was referred to the Senate Standing Committee on Education and the Arts which invited submissions and heard evidence from interested parties.
- 1.5 Based upon the Standing Committees recommendations, the Attorney-General's Department put forward another proposal for statutory licence for the copying of all broadcast programs for educational purposes in return for equitable remuneration. This received the broad endorsement from both the tertiary and schools sectors. Thus, upon the introduction into Parliament of the *Copyright Amendment Act* 1989 which included the Part VA statutory scheme the Second Reading Speech of Lionel Bowen (then Attorney-General and Deputy Prime Minister) included the following passage:

Access to the literary, musical and artistic heritage is fundamental to the role of the educator and that means access to a wide range of copyright material. The Government is therefore concerned that teachers have available to them any material of educational value circulating in both the print and audio-visual media. However, this should be achieved in a manner which ensures that relevant copyright owners are justly remunerated for use of their material.

It has been a great challenge to educators and copyright owners alike to reach agreement on this issue of educational copying. The proposed statutory licences for educational copying recognise the need for educators to have easy access to copyright material for teaching purposes. They also recognise the need for copyright owners to be remunerated for the use of that material. While copyright owners should not be called on to subsidise the educational needs of the public, there should be as few obstacles as possible to access to educational materials. The statutory licensing schemes will provide the appropriate mechanisms whereby the interests of copyright owners will be balanced against the interests of educators in the most efficient manner possible. These statutory licence schemes are also consistent with the requirements of the international copyright conventions.

- 1.6 The *Copyright Amendment Act* 1989 (and thus the Part VA statutory scheme) came into operation on 24 May 1989. Since enactment, the only substantive amendment took place in 1998 when copying from subscription television (and radio) was included within the Part VA scheme.

History of Screenrights

- 1.7 Audio-Visual Copyright Society Ltd ACN 003 912 310 is a company limited by guarantee. Formerly known by its full name or the acronym AVCS, it adopted the trading name "Screenrights" in 1997.
- 1.8 Screenrights was established by the Australian Copyright Council, which coordinated early meetings commencing in the mid-1980's of an informal committee of interest groups ("Copyright Interests Committee") which supported the introduction of the Scheme and the establishment of Screenrights.
- 1.9 The organisations comprising the Copyright Interests Committee included representatives from:
- Audio Visual Distributors Association of Australia;
 - Australasian Mechanical Copyright Owners Society;
 - Australian Broadcasting Corporation;
 - Australian Film Commission;
 - Australian Record Industry Association;
 - Australian Writers Guild;
 - Federation of Australian Commercial Television Stations;
 - Federation of Australian Radio Broadcasters;
 - Film/Video Coalition;
 - Special Broadcasting Service;
 - Producers and Directors Guild of Australia; and
 - Screen Producers Association of Australia.
- 1.10 Screenrights' incorporation expenses were met by loans from the Copyright Interests of \$1,000 each. The other establishment costs were met by way of gifts and loans in kind from the Australian Copyright Council and further financial loans from the Copyright Interest organisations. The loans were repaid from first collections in 1990 without interest.
- 1.11 The Memorandum and Articles of Association of Screenrights were formulated in consultation with the Attorney-General's Department. The mission of Screenrights is as follows:
- The Society's purpose is to facilitate the equitable return of funds to audio-visual copyright owners.*
- The Society promotes and defends the copyright system as the means of providing an incentive to creativity and investment in film and television. In pursuit of this goal, the Society acts on behalf of copyright owners in the collective administration of rights.*
- 1.12 Screenrights was declared by the Attorney-General on 13 June 1990 to be the collecting society for the purposes of Part VA of the Copyright Act.

2 Nature of the Part VA from Screenrights Perspective

- 2.1 Important to any understanding of Part VA of the *Copyright Act* is correct characterisation. Part VA does not create a “copyright licence” as that term is understood commercially. Screenrights does not grant licences in respect of members’ rights. Rather Part VA is a remunerated exception to an exclusive right attached to copyright; the reproduction right. In much the same way the Fair Dealing provisions of the Copyright Act² create non-remunerated exceptions to exclusive rights.
- (i) Part VA provides that educational institutions may, for their educational (ie “teaching”) purposes, copy transmissions (being radio, free-to-air television or subscription television) without infringing the copyright in the transmission itself, or the copyright in any work, sound recording or cinematograph film included in the transmission. However, for an educational institution to take advantage of this exception to copyright:
- a notice in writing on its behalf must be given to Screenrights undertaking to pay equitable remuneration to Screenrights for copies of transmissions it makes. The notice must specify whether equitable remuneration will be assessed on a full record-keeping system or on a sampling system; and
 - a payment of equitable remuneration to Screenrights must be made, as determined by agreement with Screenrights or, in lieu of agreement, as determined by the Copyright Tribunal. The basis of payment is determined by whether the institution elects full record-keeping or sampling:
 - for full record-keeping the amount of equitable remuneration payable to Screenrights is an amount for each copy of a transmission made;
 - for sampling, the amount of equitable remuneration payable to Screenrights is an annual amount per student of the institution determined under a sampling system.
- 2.2 Importantly, under Part VA there is no issue of “refusal to licence”. The exception to copyright is available to any educational institution, subject to the remuneration requirement. This is why such schemes are sometimes labeled “compulsory licences”.
- 2.3 Screenrights, upon collecting these funds distributes them to relevant the rights holders. A rights holder, to receive a distribution, is required to:
- become a member of Screenrights - there is no restriction or fee placed on membership and,
 - provide a warranty as to their ownership of the relevant right.
- 2.4 In respect of (say) a copy of a single television program, a plurality of discrete copyright subject matter is reproduced. Screenrights scheme of allocation, which is determined by Screenrights Board, mandates the following distribution across the different subject matter:
- | | |
|-----------------------------|-------|
| • Cinematograph film | 68.5% |
| • Literary & dramatic works | 22.1% |
| • Musical works & lyrics | 7.4% |
| • Sound recordings | 2% |

Only underlying rights are remunerated. No distribution is made in respect of the transmission itself; to the owner of the copyright subsisting in the television

² See sections 40, 41, 42, 43(2), 103A, 103B and 103C.

broadcast signal or the sound broadcast signal. This, however, is not a matter determined by the Screenrights Board. It is a result required by Part VA itself which defines "relevant copyright owner" for Part VA to be the "owner of copyright in a work, a sound recording or a cinematograph film".³ This excludes the owner of copyright subsisting in the broadcast per se.

- 2.5 Screenrights is the administrator of the Part VA scheme by reason of declaration by the Attorney-General. As such, Screenrights has stringent reporting and prudential requirements. Screenrights' Constitution documents require approval by the Attorney-General. Its audited Annual Report is remitted each year to the Attorney-General to be laid before each House of Parliament. The Attorney-General may revoke the declaration if, (among other things) Screenrights is "not functioning adequately as the collecting society". To assist Screenrights in discharging its obligations in respect of Part VA, the Attorney-General's Department issued Screenrights with a set of guidelines shortly after its declaration. Screenrights has found these guidelines to be of great assistance. Similarly, Screenrights has received a binding determination by the Australian Taxation Office in respect of the taxation treatment of Part VA collections and expenses.
- 2.6 Screenrights dealings with the education sector are also under the frequent scrutiny of the Copyright Tribunal. In two recent determinations (1997 and 1999 respectively) the Copyright Tribunal has set rates under sampling systems of \$2.60 per full-time equivalent school student and \$5.50 per full-time equivalent university student. Both rates are automatically adjusted with the Consumer Price Index. In one determination, the Tribunal gave the following guidelines as to a reasonable quantum of equitable remuneration payable under Part VA:

I could fix a figure that I thought was fair and reasonable but which would bring the whole of this arrangement to an end. Frankly, that is what, in my opinion, the effect of the AVCS [Screenrights] claim will be if it is met in full. Nobody would pay it and the whole scheme will collapse. That is the last thing that anybody wants ... However, difficult the task, I must fix equitable remuneration. And I must fix it, so it seems to me, not in a vacuum but in the setting and context of all the surrounding circumstances. In my opinion, it is relevant and appropriate for the Tribunal to take into account realities such as the capacity and willingness of the schools to pay.

The reality of Copyright Tribunal supervision over the determination of equitable remuneration under Part VA creates an additional layer of prudential control over Screenrights activities which would not exist in an ordinary commercial setting.

- 2.7 Screenrights is also a trustee of funds collected by it in the administration of Part VA.⁴ These funds are held on behalf of relevant classes of rights holders on a discretionary trust, the terms of which are found in Part VA itself, the relevant Copyright Regulations and Screenrights Constitution. A recent High Court decision has held that the broadcast of a cinematograph film may give rise to the exercise of the broadcast right in a sound recording.⁵ This came as a somewhat unexpected outcome in light of an express provision in the Copyright Act which provides "sounds embodied in a sound-track associated with visual images forming part of cinematograph film shall be deemed not to be a sound recording"⁶. In reliance on that provision, Screenrights had not included sound recordings as a genre of subject matter for which an allocation was made in respect of off-air television copying. As a consequence of the High Court's decision, Screenrights has amended its distribution policy (see paragraph 3.5) and sought declarations from the Equity Division of the NSW Supreme Court. These include declaration that Screenrights was not in breach of trust for failure to include

³ Section 135A.

⁴ Simpson, Review of Australian Copyright Collecting Societies, paragraph 7.1.3.

⁵ Phonographic Performance Company Of Australia Limited & Ors v Federation Of Australian Commercial Television Stations (1998) 154 ALR 211.

⁶ Section 23(1).

(prior to the High Court's decision) sound recordings within its scheme of distribution. That Supreme Court application remains pending.

3 Nature of Part VA from Education Sector's Perspective

- 3.1 Screenrights' dealings with the education sector over almost a decade has indicated a prevailing view that the remunerated exception to copyright created by Part VA is extremely valuable to schools and universities. The sums paid by way of equitable remuneration seem to be regarded as commensurate with benefit of the exception.
- 3.2 Thus, in 1997 before the Copyright Law Review Committee's Forum on Access to Copyright Materials, Professor Raoul Mortley, Chair of the Australian Vice-Chancellor's Committee on Intellectual Property made the following statements:

Licence fees. We are constantly concerned with this in the universities. We negotiate with the Copyright Agency Limited. The Audio-Visual Copyright Society [Screenrights] have arrangements. The figures that have been paid have been given here in the issues paper. It has always seemed to me, and here I will slip out of my role as the negotiating opponent of the collecting societies, and say that the paying of licence fees has some good effects. If this has been the means of settling the balance between the ownership of the material and the need to disseminate it then we have seen it work. The universities are paying more. This means students are getting more copies. More is being read and circulated.

So in a sense this commercial solution has opened up a lot of movement which has been to the benefit of everybody and I have always taken the view that if we see through our sampling processes the copying behaviour multiplying greatly in the universities and we are paying more - well this is probably the kind of thing we should be doing in the universities and the way we should be spending our money. It is an important priority that licence fees be settled in order to produce the copies that will spread the knowledge to the students. As someone who is responsible for the way in which money is spent in universities I have always taken the view that this activity is probably far more important than many others that we indulge in - open slather promotions for example.

- 3.3 Part VA may, indeed, give Australian educational institutions a competitive advantage over educational institutions in other countries. Increasingly, educational institutions (both schools and universities) within Australia seek to attract students from other countries and thereby "export" their education services.
- 3.4 In a recent Copyright Tribunal determination, Screenrights tendered unopposed evidence from a international expert on the educational use of audio-visual material, Richard Cornell. He is the Professor of Instructional Technology in the College of Education at the University of Central Florida and the United States member of the International Council for Educational Media. His evidence included the following observation:

In the United States, interactive learning has been greatly restricted because of the lack of flexibility resulting from the absence of a statutory licensing scheme which tracks programmes recorded from television. This can be contrasted in the Australian setting.

Interactive learning in schools in the United States occurs primarily within the confines of computing, foreign language instruction or laboratory-based classes. An exception would be in schools where there is a television studio and students create their own productions which involve extremely high levels of interactivity.

This can be contrasted with the Australian setting where, under the statutory scheme, anything can be recorded off television, including a commercial, audio track, footage of news events, or other audio-visual broadcast material. In the United States this is not possible without written permission of the copyright holder.

One of the benefits of the copyright licensing scheme, such as the scheme administered in Australia by Screenrights, is that the individual professor in higher education has control over what can be brought into a class from a video source.

This suggests that the existence of Part VA may give Australian educational institutions a competitive advantage in a global market for education services.

4 Nature of Screenrights from Rights Holders Perspective

- 4.1 Between 1990 and 1998 Screenrights has collected approximately \$70 million dollars. Over this period of time Screenrights expenses have amounted to approximately \$10 million dollars - about 14% of collections.
- 4.2 Part VA is, however, a statutory exception to the exclusive right of reproduction attached to copyright. It removes from rights holders the ability to deny authorisation and set their own terms in respect of the education sector. In its place requires the grant of access to educational institutions in return for the payment of equitable remuneration. In an ideal world, rights holders could control their own rights directly. Part VA, from Screenrights members perspective, is not part of an ideal world.
- 4.3 Notwithstanding the observations made at 4.2, Screenrights regards Part VA as a necessary scheme for the creation of a "market" for access to broadcast copyright subject matter for educational purposes. Given the current state of technology, user copyright mores and the questionable efficacy of ad hoc copyright infringement proceedings, Part VA seems a fair and pragmatic balancing of interests.
- 4.4 Rights holders generally, but in particular Australian documentary film makers, rely upon Screenrights distributions to recoup production expenses and to reinvest in further productions. This underscores the philosophy for copyright; incentive for creativity.
- 4.5 In a recent Copyright Tribunal determination, evidence tendered by the Australian documentary film-maker James Gerrand (accepted and relied on by the Tribunal) explained:

Screenrights royalties, with other potential revenue sources, act as an incentive to produce documentaries of educational value. In the early years of the operation of the Screenrights scheme, I regarded Screenrights royalties as an unexpected bonus. Now I have come to expect returns from this source and the potential for Screenrights royalties influences production decisions.

The film maker gave evidence that a documentary produced by him (*The Last God King* which traces Cambodian History from the time King Sihanouk was placed on the throne by the Vichy French at the age of 19 until the present day) earned approximately \$23,000 in distributions under Part VA. The production cost of the documentary was approximately \$350,000 and was financed by him without any investment from the Australian Film Finance Corporation or other government funding bodies.

- 4.6 Similarly, evidence tendered to the Copyright Tribunal by another Australian documentary film maker, Chris Hilton (co-producer of *Year of the Dogs*), the

importance of Part VA to the market for Australian documentaries was put in a wider commercial perspective:

Within the potential non-theatrical market, the single most important source of potential returns is royalties from copying in the educational institutions market. Before the introduction of the scheme administered by Screenrights under the Copyright Act, this market was solely comprised of videocassette sales. However, now educational institutions may copy from television broadcasts. This has the potential to decrease videocassette sales and so the level of remuneration received through Screenrights is crucial to maximising the returns to investors. Furthermore, the royalties from Screenrights offset, at least to some extent any reduction in revenue from video sales.

- 4.7 Similarly, David Noakes, Investment Manager at the Australian Film Finance Corporation, gave evidence before the Copyright Tribunal that:

Generally, it is difficult to procure any overseas distribution interest for documentaries. This is especially so if the material that is contained within a documentary is strongly culturally relevant to Australia.

The FFC is required to take into account the company's recoupment position in making investment decisions and to strike a balance between maximising the value of the production slate returns on the Governments' investment. One of the objectives of the FFC is to support projects that can potentially realise returns and to secure an appropriate return on each of its investments.

As it is difficult to secure overseas distribution interest in documentaries, the only real returns will come from:

- (a) broadcast fees for free-to-air television from a local broadcaster and fees for the right to exploit pay television rights and satellite television rights;*
- (b) the sale of video cassettes to the educational sector;*
- (c) royalties from the educational sector through the off-air copying scheme administered by Screenrights; and*
- (d) the sale of video cassettes to the general public.*

An FFC invested documentary generally recoups approximately 10% of the FFC's investment. The off-air copying royalties actually received by the FFC under the Screenrights scheme averages approximately 29% of the FFC total recoupment. Although this does not represent the majority of the recoupment of the FFC's investment, it is nevertheless a significant contribution towards the recoupment achieved by the FFC for these projects.

- 4.8 If it is considered that financial incentive to Australian documentary film-makers to produce more documentaries gives rise to public benefits, Part VA can be seen to benefit the public to this extent.

5 Part VA and Restrictions on Competition

- 5.1 The characterisation of Part VA put in this submission is one of Part VA as a remunerated exception to an exclusive right of copyright owners.
- 5.2 Put another way, Part VA is an answer to the question:

“How do we enable educational institutions to easily record broadcast programming for their teaching purposes, and overcome the ‘copyright problem’?”

Ease of access to copyright material for education is at the heart of Part VA. Whilst payment to rights holders is central to the operation of Part VA, ease of access is possibly paramount. It is the desire for ease which explains why section 135P(2) of Part VA provides:

The Attorney-General shall not name more than one body in a declaration and shall not make a declaration while an earlier declaration is in force.

For such a remunerated exception to overcome the very problem for which it was created - users having to deal with a multiplicity of rights holders and risking infringement when clearances can not be obtained - simplicity is required. This calls for a single reference point for both users and owners to administer the exception. Screenrights is that single reference point, under the scrutiny of its members, the Commonwealth Parliament, the Copyright Tribunal and Courts of Equity. The Part VA model is one of quasi public administration of copyright to facilitate a remunerated exception for educational purposes.

- 5.3 In 1997 the Copyright Law Review Committee requested comments from interested parties regarding possible adoption in Australia of the “voluntary” educational broadcast licensing scheme currently extant under English and New Zealand legislation (section 35 of the UK *Copyright Designs and Patents Act 1988* and section 48 of the NZ *Copyright Act 1994*). Screenrights submitted its view that this statutory model is deficient when compared to Part VA. The Copyright Law Review Committee’s recommendation rejected this alternative:

Neither users nor owners, however, proposed a radical recasting of the provisions of the Act that currently relate to educational copying. In particular, the majority of submissions from both users and owners recommended retention of the present statutory licensing schemes set out in Parts VA and VB of the Act.

The Committee had invited comment on adoption of the scheme for educational copying found in ss. 35 and 36 of the UK Copyright, Designs and Patents Act 1988, under which a free compulsory licence permits the copying of a limited amount of copyright material in the absence of an agreed voluntary licence. The principle underlying the scheme is to encourage the parties to reach agreement on permissible copying. For various reasons the parties affected in Australia do not consider this a satisfactory way to deal with educational copying. The Committee considers that the position in Australia is now well established and well known to all parties and no case has been made for a change in the general approach.⁷

In the event that the Intellectual Property and Competition Review Committee is interested in this alternative to the Part VA model, Screenrights comments as follows.

- 5.4 The English and New Zealand provisions are not voluntary licence schemes as one would normally understand that expression. They operate so that in the

⁷ Copyright Law Review Committee, *Simplification of the Copyright Act, Part 1 - Exceptions to the Exclusive Rights of Copyright Owners*, 174.

absence of a contractual licence, legislation in effect provides a compulsory free licence to educational users in the form of a complete defence to infringement. The rights of copyright owners are exercisable by educational users with neither permission nor remuneration. Screenrights regards these provisions as an extreme incursion upon the rights of copyright owners.

- 5.5 The English and New Zealand provisions provide for collective administration of copyright without statutory machinery. In the absence of a statutory mechanism providing for collective administration, the transaction costs in obtaining licences from all the relevant copyright owners is high. The copying of a single off-air television program could entail licences for:
- copyright in the broadcast
 - copyright in the cinematograph film
 - copyright in the script
 - copyright in the music
 - copyright in any works of visual arts therein contained
 - copyright in the sound recording
- 5.6 The English and New Zealand legislation confront educational users with the possibility of a multiplicity of licensing schemes, covering different repertoire and containing different terms. Further, schemes may be created which (say) exclude certain parties from membership on the basis of nationality. Screenrights experience of an administration of under the English scheme suggests this. Although such conduct is contrary to international copyright norms (see below at paragraphs 6.2 and 7.3) if unchecked it could give rise to both prejudice and a proliferation of national-based licensing schemes operating in the one country.
- 5.7 All this may be contrasted with the present position in Australia where an educational user need approach only one body in respect of a licence scheme set out in legislation. It is the loss of this simplicity which lies at the heart of the findings of the Copyright Law Review Committee that "neither users nor owners, however, proposed a radical recasting of the provisions of the Act that currently relate to educational copying".

6 Part VA, Screenrights and Balance of Trade

- 6.1 One aspect of Part VA which the Committee may wish to consider is its effects on Australia's balance of trade position.
- 6.2 An important international norm of copyright law is that of Art 5(3) of the Berne Convention which in part provides "when the author is not a national of the country of origin of the work for which he is protected under this Convention, he shall enjoy in that country the same rights as national authors." Discrimination against the works of foreign nationals, where those works fall under the protection of the Berne Convention, amounts to a violation of both Berne and TRIPS. Part VA contains no such discrimination (see paragraph 7.3).
- 6.3 The majority of funds collected by Screenrights under Part VA are remitted to Australian-based rights holders. This is a function of the nature of programming copied by the Australian educational sector. Thus, for the years 1991 to 1997 only 26% of the total distributable amount has been distributed overseas. At paragraphs 4.3 to 4.6 (above) accounts as to the effect of Screenrights distributions upon Australian rights holders has been outlined.
- 6.4 Further, Screenrights activities outside Part VA involve both collecting for predominately Australian rights holders in foreign markets and administering an off-air copying schemes for rights holders in a foreign market. These are discussed below in section 8.

7 Part VA and International Obligations

7.1 Article 9 of the Berne Convention provides:

- (1) *Authors of literary and artistic works protected by this Convention shall have the exclusive right of authorizing the reproduction of these works, in any manner or form.*
- (2) *It shall be a matter for legislation in the countries of the Union to permit the reproduction of such works in certain special cases, provided that such reproduction does not conflict with a normal exploitation of the work and does not unreasonably prejudice the legitimate interests of the author.*
- (3) *Any sound or visual recording shall be considered as a reproduction for the purposes of this Convention.*

7.2 Screenrights regards Part VA, and in particular the requirement that rights holders receive "equitable remuneration", as meeting the obligation that copies made in reliance on Part VA do not "not unreasonably prejudice the legitimate interests" of rights holders. This view was shared by the Attorney-General on the introduction of the Part VA scheme to Parliament: "These statutory licence schemes are also consistent with the requirements of the international copyright conventions" (see paragraph 1.5 above).

7.3 As noted above at paragraph at paragraph 6.2, Article 5(3) of the Berne Convention provides "when the author is not a national of the country of origin of the work for which he is protected under this Convention, he shall enjoy in that country the same rights as national authors." Part VA, and Screenrights administration of Part VA, are avowedly non-discriminatory in character. Part VA mandates that to be the declared collecting society, Screenrights rules must permit that all relevant copyright owners, or their agents, are entitled to become its members. Screenrights distribution policies, in turn, rest entirely on the type of subject matter (see paragraph 2.5 above). No issue of nationality of rights holders arise. Screenrights' membership is presently derived from 40 countries.

7.4 Screenrights notes the incorporation of Articles 5(3) and 9 of the Berne Convention as a TRIPS obligation.

8 Other Activities of Screenrights

International Collection Service

8.1 Since 1996 Screenrights has commenced offering services in collecting overseas royalties on behalf of members who voluntarily delegate Screenrights that function. Under voluntary membership agreements, rights holders may delegate Screenrights to be their non-exclusive agent in the collection of royalties from a variety of overseas cable retransmission, blank tape and rental schemes. This service is relatively new. Predominately Australian rights holders have availed themselves of it. Over \$500,000 has been collected to date.

New Zealand Educational Copying

8.2 Since 1998 Screenrights has operated an educational off-air copying licensing scheme in New Zealand. This scheme, operated under legislation the limitations of which are described above at paragraphs 5.4 to 5.7, has collected over \$200,000 in the past financial year.

Government Copying

- 8.3 In 1998 amendments were passed to the Copyright Act to provide for a statutory licence in respect of government copying (Commonwealth, State and Territory). The licence may be administered by one or more collecting society declared by the Copyright Tribunal. Where there is more than one society the declaration is in respect of a "specified class of government copies"⁸. Screenrights has sought a declaration from the Copyright Tribunal in respect of the following classes of copyright material :

- (i) a sound recording; or
- (ii) a cinematograph film; or
- (iii) a television or sound broadcast; or
- (iv) a work that is included in a sound recording, a cinematograph film or a television or sound transmission

in respect of the application of the copyright to the making of a copy of a transmission of a sound broadcast or a television broadcast including (to avoid doubt) a sound broadcast transmitted for a fee and a television transmission to subscribers to a diffusion service.

This application is pending before the Copyright Tribunal. Screenrights expects it to be dealt with this year.

Retransmission

- 8.4 The government's 1996 election platform included the introduction of reform such that underlying rights holders receive payment in respect of the cable retransmission of their works. This means when a pay television company (such as Foxtel) retransmits a free-to-air broadcast signal (such as Channel 9) some payment is made by the pay television company to the rights holders whose works are included within the free-to-air broadcast signal.
- 8.5 This year in the Digital Agenda Bill an attempt was made to introduce this reform by means of a statutory licence. Both Screenrights and the Australian Subscription Television and Radio Association ("ASTRA", the peak body for the pay television industry) considered the drafting would create an unworkable scheme. Consequently, Screenrights and ASTRA have jointly submitted a revised draft statutory licence, modeled on Part VA. Screenrights is currently awaiting the release of a further exposure draft of the Digital Agenda Bill. Assuming the form of any enacted retransmission statutory licence is acceptable to Screenrights, Screenrights will seek the declaration to administer the scheme.

⁸ Section 153F(5)(b).

Members of Audio-Visual Copyright Society Ltd Trading as Screenrights

15.30 Productions	Arief International Inc
220 Productions Pty Ltd	Arista Films, Inc
7 Emus Pty Ltd	Arista Pictures International
AB Svensk Filmindustri	Arrival Films Ltd
ABARE	Artist Collections Group Ltd
ABC Distribution Company	Artist Services Pty Ltd
Aboriginal Development Division - NSW	Artist Services Pty Ltd (ACN 070 352 046)
Tafe Commission	Arundel Productions Pty Ltd
Aboriginal Nations Pty Ltd	Aspire Films Pty Ltd
Acacia Productions Limited	Associated Dutch Media B.V
Access all Areas Pty Ltd	Associated Press TV
Acropolis Now Pty Ltd	Associated R&R Films Pty Ltd
Adler Media, Inc, formerly called Adler	Associated Television International
Video Marketing Ltd	ATA Trading Corporation
Adriana Chiesa Enterprises	Atlantis Releasing Pty Ltd
Advanced Video Productions	Atrium Films International (Australia) Pty Ltd
Africa Odyssey Productions Pty Ltd	ATV Enterprises Limited
Africa Pictures Australia Pty Ltd	Aurora Films Pty Ltd
Agence Du Court Metrage	Ausdrama Pty Ltd
Agence France-Presse (AFP)	Austereo MCM Entertainment Australia Pty Ltd
Ahmed A Jamal	Australasian Mechanical Copyright Owners Society Ltd
Ahmed Baha Eddine Attia	Australasian Performing Right Association Limited
Alan Berliner	Australian Baseball League Pty Ltd
Alastair B Eadie	Australian Broadcasting Corporation
Albert Street Productions Pty Ltd	Australian Catholic University
Alberto Grimaldi Productions SA	Australian Childrens Television Foundation
Album Productions	Australian Dancing Society Ltd
Alex Smythe	Australian Film Commission
Alfred Haber Inc	Australian Film Institute
Alfred Road Films Pty Ltd	Australian Film, Television & Radio School
All American Television Inc	Australian Geographic Pty Ltd
Alley Kat Productions	Australian Institute of Aboriginal and Torres Strait Islander Studies
Alliance Communications Corporation	Australian Quality Awards Foundation Limited
Allison Catherine Rowe	Australian Record Industry Association Ltd
Along Mekong Productions	Australian Screen Associates Ltd
Alyce Mackerras	Australian Volleyball Federation Inc
Amalgamated Television Services Pty Ltd	Austrian Broadcasting Corporation (ORF)
Amanda King	Authors' Licensing & Collecting Society Limited
Amanda King & Fabio Federico Cavadini trading as Frontyard Films	Autism Victoria Inc
Amaya Distribution SA	Avalon Films Pty Ltd
American Documentaries Inc	Avenue Entertainment, Inc
Ampersand	Banksia Productions Pty Ltd
"Andrea Films" - Garcia y Caiozzi Ltd	Barbara Albury
Angela Borelli	Barbara Anna Chobocky
Anna Johnson	Barbara Mobbs
Annamax Media Pty Ltd	Barbara Moore
Anne Brookman	Barely Enough Pty Ltd
Anne Deveson Productions Pty Ltd	Barron Entertainment Ltd
Antelope (UK) Ltd	
Antenna Television SA	
Anthony A Williams Management Pty Ltd	
Anthony Buckley Films Pty Ltd	
Apple Corps Limited	
Arc Films Ltd	
Archives Office of Tasmania	
Arenafilm Pty Ltd	
Argosy Films Pty Ltd trading as The Video Bookshelf	

Bavaria Film GmbH
 BBC Enterprises Ltd
 Bearded Lady Productions Pty Ltd
 Becker Group Limited
 Belgische Radio & Televisie (BRTN)
 Bellester Investment Limited
 Ben Cropp Productions Pty Ltd
 Benjamin Sellinger
 Bernard Purcell
 Berry Billingsley
 Berry Minott
 Beyond Distribution Pty Ltd
 Beyond Films Ltd
 Beyond Properties Pty Ltd
 Big Bear Licensing Corp., Inc
 Big Bear Picture Company
 Bill Bennett Productions Pty Ltd
 Bill Harding
 Billy's Holiday Pty Ltd
 Binnaburra Film Co Pty Ltd
 Bioskop-Film GmbH & Co
 Produktionsteam KG
 Black Dog Pictures Pty Ltd
 Blackside Inc
 Blood Oath Productions Pty Limited
 Board of Studies (Victoria)
 Bondi Picture Company Pty Ltd
 Boreales
 Brandman Productions, Inc
 Brian Jackson Films Ltd
 Bridie Films Pty Ltd
 Brisbane TV Limited
 British Film Institute
 Broadstar Entertainment Corporation
 Bronwyn Hession
 Bronwyn Kidd trading as Big Cat
 Productions
 Brook Lapping Productions Ltd
 Bruce Griffiths
 Bruce Petty
 Bubby Pty Ltd
 Buena Vista International, Inc
 Burbank Animation Studios Pty Ltd
 BWE Inc
 Byron Bay Media Pty Ltd
 CAAMA Productions Pty Ltd
 Calliope Film Resources Inc
 Calypso Films Pty Ltd
 Camerawork Pty Limited
 Campbell McComas & Company Pty Ltd
 Canadian Broadcasting Corporation
 Canal + Distribution GIE
 Canal + Image UK Ltd
 Capa Presse TV
 Capella International, Inc
 Capitol Films Limited
 Carlton International Media Ltd
 Carlyon & Rivette Pictures Pty Ltd
 Carolco Pictures, Inc
 Caroline Jones Incorporated Pty Ltd
 Carolyn Burns
 Casablanca Production S.A.
 Cascade Ash Pty Ltd
 Cascade Films Pty Ltd
 Castle Hill Productions Inc
 Catalyst Distribution Inc
 Catalyst Television Ltd
 CBS Broadcasting Inc
 CCM Group (Australia) Pty Ltd
 CEL Communications Inc
 Celia Films
 Celluloid Dreams SARL
 Centaur Enterprises Pty Ltd
 Center for Investigative Reporting Inc
 Central Queensland University
 CFP International
 Channel 9 South Australia Pty Limited
 Channel Four Television Corporation
 Channel Television Limited
 Chapman Clarke Ltd
 Chapman Films Pty Ltd
 Chapman Pictures Pty Ltd
 Charles Schuerhoff t/a CS Associates
 Children's Television Workshop, Inc
 China Film Export & Import Corporation
 Christian Broadcasting Association
 Limited
 Christopher Puplick
 Christopher Tugwell
 Chrysalis TV & Film (Overseas) Limited
 Chuck Olin Associates Inc
 ChumCity International
 Ciby Sales Limited
 Cicada Films
 Cinar Films Inc
 Cine Electra (UK) Limited
 Cine-International Filmvertrieb GmbH &
 Co KG
 Cinema Arts Entertainment
 Cinematheque Prague S.R.O.
 Cinequanon Pictures International Inc
 Cinesound Movietone Productions Pty
 Ltd
 Cinetel Films, Inc
 Cinetel Productions Pty Ltd
 Cinevest Entertainment Group, Inc
 Cinexport
 CITEC Corporate Television
 City Pictures Pty Ltd
 Claude Edelmann
 Coligny Holdings Pty Ltd
 Colin Baker Cinegroup Productions Pty
 Ltd
 Colin Mackerras
 Columbia Tristar Television Pty Ltd
 Commonwealth of Australia (acting
 through Department of
 Health & Family Services)
 Commonwealth of Australia (DEET)
 Comunicado Limited
 Communique Pty Ltd
 Community Aid Abroad
 COMPACT Collections Limited
 Compagne Luxembourgeoise De
 Telediffusion SA
 Compass Film SRL

Comtel Inc
 Concorde-New Horizons Corporation
 Connected Media Trust
 Constantin Film Produktion GMBH
 Consuming Passions Pty Ltd
 Contemporary Films Ltd
 CORI Film Distributors Ltd
 CPT Holdings, Inc
 Craig Baldwin
 Crawford Action Time Pty Ltd
 Crawford Productions Pty Ltd
 Crew Neck Productions
 Cross Country Productions Pty Ltd
 Crossroads/PSO
 Crown International Pictures, Inc
 Crystal Sky International
 CSIRO Australia
 CTC Productions
 CTVC
 Curb Entertainment International Corporation
 Curtis Brown (Aust) Pty Ltd
 Curtis Levy (Indonesia) Pty Ltd
 D Generation Pty Ltd
 DA Films Pty Ltd
 Damon Smith Productions Pty Ltd
 Daniel Scharf Productions Pty Ltd
 Danmarks Radio TV
 Daro Film Distribution
 Davian International Ltd
 David Bradbury
 David Curl
 David George Ellyard
 David George Stone
 David Monahan
 David Rabinovitch
 David Thomas trading as Fineline Films
 David Walker
 Daybreak Pictures Limited
 De Montignie Communications Pty Ltd
 t/a Discovery International
 Debra Beattie
 December Films Pty Ltd
 Dendy Cinema Pty Ltd
 Denis Keith Whitburn
 Department of Education for the State of Victoria
 Department of English, Monash University
 Dergat Pty Limited
 Detlef Urban Filmproduktion
 Devillier Donegan Enterprises LP
 Dewitt Sage
 Dick Clark Productions Inc
 Dick Gilling
 Dick Smith Investments Pty Ltd
 Dipcorn Pty Ltd trading as Rakmar Enterprises
 Direct Broadcast Network Pty Ltd
 Direct Cinema Ltd Inc
 Direct Video Pty Ltd
 Disney Entertainment Pty Ltd
 Displaced Films
 Distant Horizon Ltd
 Dixon Productions Ltd
 DLT Entertainment Ltd
 Documentary Films Pty Ltd
 Don Bennetts Films Pty Ltd
 Don Featherstone Productions Pty Ltd
 Dream Entertainment, Inc
 Duo Art Productions Pty Ltd
 Eastrex Pty Ltd, T/A Television Oceania
 Eclectic Films Pty Ltd
 Edgecliff Media Pty Ltd
 Editel (WA) Pty Ltd
 Edith Cowan University
 Edmund Capon A.M.
 Edmund JC Allison t/a Quality Films
 Educational Broadcasting Corporation
 Educational Broadcasting Corporation (Thirteen WNET)
 Educational Film Center
 Educational Media Australia Pty Limited
 Edward Street Films
 Effie Holdings Pty Ltd
 EKCo Television Ltd
 Electric Pictures Pty Ltd
 Eliot Jarvis Productions Pty Ltd
 Elizabeth Nield
 Ellen Bruno
 Ellen M Krass Productions
 Emdee Productions Ltd
 Emerald Films Pty Ltd
 Endemol International Distribution S.A.
 ERF Edgar Reitz Filmproduktion GmbH
 Essential Productions Ltd
 Estate of Raymond Rohauer
 Euro London Films Ltd
 EuroArts International GmbH
 Eurocam Productions Pty Ltd
 Europe Images
 European Media Support BV
 Eva Orner t/a Fertile Films
 Evangelische Omroep
 Everest Entertainment, Inc
 Excalibur Nominees Pty Ltd
 Expanded Entertainment Inc
 Exportfilm Bischoff & Co GmbH
 F For Film
 F-films Pty Ltd
 f-reel Pty Ltd
 Faction Films Ltd
 Far Sighted Documentaries Pty Ltd
 Far Sighted Films Pty Ltd
 Felicity St John Moore
 Ferndale Films Limited
 Field Associates (Aust) Pty Ltd
 Figaro Films SA
 Fiji Independent News Service Inc
 Film Art Doco Pty Ltd
 Film Australia Ltd
 Film Culture Pty Ltd
 Film Investment Corporation Ltd
 Film Polski - Film Agency
 Film Positive Pty Ltd
 Film Projects Pty Ltd

Film Roman, Inc
 Film Workshop Company Ltd
 Film World Entertainments, Inc./Miracle
 Films
 Filmalpha Srl
 Filmexport Group
 Filmexport Prague Distribution SRO
 Filmistuudio SEE
 Filmpac Holdings Limited
 Filmrep Ltd
 Films Transit International Inc
 Filmstar, Inc
 Filmways Multi Media Pty Ltd
 First Light Film and Television
 Productions Pty Ltd
 First Pictures Limited
 Flach Pyramide International
 Flaming Star Films Pty Ltd
 Flaming Star Pty Ltd
 Flashback Productions Ltd
 Fleur Films Pty Limited
 Flextech Rights Limited
 FM TV Australia Pty Ltd
 Forefront Films Inc
 Försti-Film Ky
 Fortian Productions Pty Ltd
 Fortissimo Films Sales
 Forum Media GmbH
 Fox Lorber Associates Inc
 Frame Up Films Ltd
 France Television Distribution
 Frances Nolan Shoes Pty Ltd
 Francis John Marsh Greenslade
 Francois Jeannet
 Frederic Laffont
 Frederick Warne & Co Ltd
 Fremantle International Productions
 Frontline Television Productions Pty Ltd
 Fulmar Television & Film Ltd
 Funky Squad Pty Ltd
 Futura Film Weltvertrieb Im Filmverlag
 der Autoren
 Futuremedia Pty Limited
 G.E.L. Distribution, Inc
 Gabrielle Kelly
 Gaia Films Pty Ltd
 Gannon Jenkins Television Pty Ltd
 Garner MacLennan Films Pty Ltd
 Gary Kildea
 Gary Reilly Productions Pty Limited
 Gaumont
 Genesis Films Pty Ltd
 George Andrews Productions Ltd
 George Paul Csicsery
 George Thomas Dodd
 Gever Pty Ltd trading as The Dee
 Cameron Company
 Gevest Australia Pty Ltd
 Gianfranco Cresciani
 Gil Scrine
 Gillespie Film Productions Pty Ltd
 Gillian Leahy
 Gittoes & Dalton Productions Pty Ltd
 Golden Dolphin Productions Pty Ltd
 Golden Press - A Division of Harper
 Collins Publishing Australia Ltd
 Goldfarb Distributors Inc
 Goldwyn Films Inc
 Golvan Arts Management Pty Ltd
 GPP-TV International Pty Ltd
 Grainger Television Australia Pty Ltd
 Granada Media Group Limited
 Granada Television Ltd
 Grand Bay Films Pty Ltd
 Grant Lahood
 GRB Entertainment
 Great North International Inc
 Greek Film Centre
 Green Cape Pty Ltd
 Green Communications, Inc
 Green Light Angst Pty Ltd
 Green Lion Productions Inc
 Greenstone Pictures Ltd
 Griffith University
 Grundy Australia Productions Pty Ltd
 Grundy Entertainment Pty Ltd
 Grundy Motion Pictures Pty Ltd
 Grundy Television Pty Ltd
 Gulliver Film Productions Pty Ltd
 Gulliver Media Australia Pty Ltd
 GWFF - Gesellschaft Zur Wahrnehmung
 Von Film Und Fernsehrechten
 Habibi Films Pty Ltd
 Hachette-Livre SA
 Hallmark Entertainment
 Hamdon Entertainment
 Handmade Films Ltd
 Harcourt Films Ltd
 Harmony Gold USA, Inc
 Harun Farocki
 Harvey Taft Pty Ltd
 He Taonga Films Ltd
 Headquarters Training Command - Army
 Hearst Entertainment, Inc.
 Hedrick Smith Productions Inc
 Helen Gaynor
 Heliograph Pty Ltd
 Heritage Entertainment Inc
 Hibiscus Films Pty Ltd
 Hibola Pty Ltd trading as Eastway
 Communication
 High Road Productions Inc
 Hilary Linstead & Associates
 Horsfield Family Trust
 House & Moorhouse Films Pty Ltd
 Howard Taylor Productions
 HRT / Hrvatska radiotelevizija
 HSV Channel 7 Pty Ltd
 HTV Limited
 Hugh Alastair Ford
 Hugh Sheppard
 Hungarofilm Ltd
 Huzzah Productions Pty Ltd
 Iain George Gillespie
 Iain George Gillespie & Jacqueline
 Gillespie

Ian Hamilton Holland
 Ian Stagg
 Ian Watt trading as Teleprograms
 Marketing
 Ian William Lang
 Icarus Films International Inc
 Icarus Films Pty Ltd
 Icelandic National Broadcasting Service -
 Television (RUV)
 Icon Entertainment International
 Idameneo No 221 Pty Ltd t/a LUCAS
 PRODUKZIONS
 Ideale Audience
 IFM Film Associates Inc
 Igelfilm GmbH
 Iguana Film Productions Pty Ltd
 Ilan Ziv
 Image Organisation, Inc
 Imagine Ltd
 Imparja Television Pty Ltd
 Imperial Entertainment B.V.
 In Pictures Ltd
 In the Picture Productions Pty Ltd
 InCA Independent Communications
 Associates Pty Ltd
 Inedithing SA
 Infact
 InformAction Films Inc
 Initial Entertainment Group
 Initial Film & Television Ltd
 Insight News Television Ltd
 Insomnia Film Television Software Pty
 Ltd
 Institut National De L'Audiovisuel
 Inter Cine TV
 Inter Naciones
 Interface Productions Pty Ltd
 Interlight Pictures, Inc
 Intermedia Film Distribution Limited
 Intermedia Film Distribution Ltd
 International Broadcasting Trust
 International Business Machines
 Corporation
 International Committee of the Red
 Cross
 International Management Group of
 America Pty Ltd
 International Olympic Committee
 International Paralympic Committee
 International Television Enterprises
 London (ITEL)
 Intra Films Srl
 Investigative Productions Inc
 Ipson Facto Productions Pty Ltd
 Iris Pictures Pty Ltd
 Ita Buttrose Pty Ltd
 Italtoons Corporation
 ITC Entertainment Group
 Itcon B.V.
 ITN Ltd
 Itziar Elizalde
 Ivanhoe Broadcast News
 IVN Entertainment Inc
 J & M Entertainment Limited
 Jacqueline Gillespie
 James G Gerrand
 James Klein
 James Wallace Productions Ltd
 James William Kestevan
 Jan Chapman Productions Pty Ltd
 Jan Sardi
 Jane Balfour Films
 Jane Cole
 Jane Gabriel
 Janet Bell trading as Janet Bell
 Productions
 Janson Associates Inc
 Jared Katsiane
 Jean-Luc Faubert
 Jeanette Johnson trading as Rokkette
 Productions
 Jeck Film
 Jennifer Cornish Media Pty Ltd
 Jennifer Mary Crocker
 Jequerity Pty Ltd
 Jeremiah Films
 Jeremy Michael Bayliss Smith
 Jim Henson Productions Ltd
 Jim Stevens trading as Green Diamond
 Productions
 JNP Films Pty Ltd
 Joanna Murray-Smith
 Joanna Stewart
 John Hibberd
 John Hughes
 John Moore Productions Pty Ltd
 John Sexton
 John Watson Funder
 John Weir
 Jollification Pty Ltd
 Jonathan Dawson
 Jonathon Martin Biggins
 Jose Maria Lara
 Jotz Productions Pty Ltd
 Julian David Keith Thomas
 Juniper Films Pty Ltd
 K Films
 KAET
 Kahukura Productions Ltd
 Kaleidescope Entertainment Inc
 Kaplan Productions (Formerly Sunrise
 Associates Ltd)
 Karen Hughes
 Karen Thorsen
 Kath Shelper trading as Axle Films
 Kathleen O'Brien
 Kathryn Millard
 Kathy Morgan International
 KCET (Community Television of
 Southern California)
 KCTS Television
 Keirfilm Productions Ltd
 Kellerban Pty Ltd
 Kennedy Miller Pty Ltd
 Kennedy White Pty Ltd
 Kerry Negara

Kevin Rafferty
 Keystone Pictures
 Kinéimage International Inc
 King World Productions Inc
 Kinnevik Media Properties Ltd
 Kitaron Productions Pty Ltd
 Knowledge Network, Open Learning Agency
 KQED-TV Inc
 KUTV LP
 Lakeshore International
 Landcare Australia Ltd
 Landseer Film & Television Productions Ltd
 Large Door Limited
 Largo Entertainment, Inc
 Larry George Parr
 Laura Jones
 Lawrence O Holmberg Jnr
 Lawrence Webb
 Learning Designs Inc
 Lemman Productions Ltd
 Les Films Ariane
 Les Films D'ici
 Les Films Du Carrosse
 Les Films Du Losange
 Les Productions ISCA
 Leucadia Film Corporation
 LFP SA-Les Films Pelléas
 Liberty International Entertainment Inc
 Lifetime Productions International
 Light Source Films Pty Ltd
 Lighthouse Films Pty Ltd
 Lilliana Gibbs Productions Pty Ltd
 Limelight Productions
 Lions Den Productions Pty Ltd
 Little Universe Films Pty Ltd
 Live International
 Live It Up Productions Pty Ltd
 Living Pictures (Australia) Pty Ltd
 Living Pictures Productions Pty Limited
 Livingstone Productions Ltd
 Liz Difiore trading as D & D Productions
 LJ Merchandising Pty Ltd
 London Electronic Arts
 London Film Productions Ltd
 Lone Borsing
 Look Film Productions Pty Ltd
 Look Sharp Productions
 Look Television Productions Pty Ltd
 Lorraine Groleau
 Lucasfilm Ltd
 Lucky Country Productions Pty Ltd
 Lumiere Productions Inc
 Lumiere SA
 M and A Film Productions Pty Ltd
 MacMillan Films Pty Ltd
 Macquarie University
 Magic Boot Entertainment Pty Ltd
 Magnus Carlsson
 Majestic Films Ltd
 Malcolm Douglas
 Malcolm John Jones
 Manga Entertainment Limited
 Maniana Holdings Pty Ltd T/as Reel Images
 Maracaibo Films Pty Ltd
 Marathon International
 Marc Levie Visuals
 Marcus D'Arcy
 Marek Rozenbaum
 Margaret Anne Brock
 Margaret Fink Films Pty Ltd
 Margaret Scott
 Mark Eliot
 Mark Poole
 Mark Spratt trading as Potential Films
 Market Street Films Pty Ltd
 Markus Lambert
 Marlin Media Distribution AB
 Marquee Entertainment, Inc
 Martien Coucke
 Martin Kurt Friedel
 Maryland Public Television
 Massimo Vigliar
 Matt Carroll Films Pty Ltd
 Mayfair Entertainment International
 Mayfan Pty Ltd
 Maysles Films Inc
 McKinnon Films Ltd
 MDP Worldwide
 Me, Myself & Eye - Film - Und TV Produktions GmbH
 Media Arts International Pty Ltd
 Media World Features Pty Ltd
 Media World Pty Ltd
 Mediacast Pty Ltd
 Mediaset SPA
 Mediterranee Film Productions
 Medstar Television, Inc
 Meech Grant Productions Limited
 Meerkat Productions BV
 Melodrama Pictures Pty Ltd
 Merchant Ivory Productions
 Mercure Distribution SARL
 Meridian Film Productions Limited
 Meridian Films Pty Ltd
 Merrion Frances Fox
 Metro - Goldwyn - Mayer Studios Inc
 Metropolis Filmvertrieb AG
 Michael Blackwood
 Michael Blackwood Productions Inc
 Michael Hall
 Michael Havas
 Michael Hollander
 Michael Hurll Television
 Michael Schlomer
 Michael Searle Nominees Pty Ltd trading as Storyteller Productions
 Michel Dubois
 Miel van Hoogenbemt
 Milestone Film & Video, Inc
 Mills Street Productions Pty Ltd
 Minotaur International Ltd
 Miramax International

MISR International Films (Youssef Chahine & Co)
 Mistpalm Pty Ltd
 Mitzi Goldman
 Molitor Productions
 Monash University
 Moonstone Entertainment
 More Than Illusion Films Pty Ltd
 Morgan Creek International, Inc
 Morgan Schiff Pty Ltd
 Morrison Grieve Limited
 Mosaic Films Ltd
 Mosaic Pictures Ltd
 Motion Arts Australia Pty Ltd
 Motion Control Ltd
 Mountain of Light Productions
 Movie Group Inc
 Movie Reps International
 Movietime SRL
 Moving Images Distribution Society
 MP Consulting International, Inc
 MPC Publishing and Collection BV
 MTV Music Television
 Mulga Wire Pty Ltd
 Multimedia Entertainment Inc
 Mundovision Ltd
 Murdoch Magazines Pty Ltd trading as Better Homes and Gardens TV
 Murdoch Media Pty Ltd
 Murray-Darling Basin Commission
 Mushroom Pictures Pty Ltd
 Nadia Wheatley
 Natalie Miller Pty Ltd t/a Sharmill Films
 National Centre for Australian Studies
 National Film Development Corporation
 National Institute for Deaf Studies, La Trobe University
 Natural History New Zealand Ltd
 NBC, Inc
 NBD Television Ltd
 NBN Limited
 Nebraskan's for Public Television Inc
 Necessary Illusions Productions Inc
 Nederlandse Omroep Stichting (NOS)
 Negus Media International Pty Ltd
 Nelvana Enterprises Inc
 Network TEN Limited
 New Age Publishers Pty Ltd t/a New Era Films
 New Line International
 New South Wales Rugby League Ltd
 New World Entertainment, Ltd
 New York Centre for Visual History
 New Zealand Film Commission
 Newvision Film Distributors Pty Ltd
 Newvision International Pty Ltd
 NGTV International Ltd and Timewise Investments Ltd t/a Explore International Partnership
 Nick Torrens Film Productions Pty Ltd
 Nine Network Australia Pty Ltd
 Ninox Films Ltd
 Nippon Hosokyo
 NIS Film Distribution Holland
 Noble Productions, Inc
 Nomad Films International Pty Ltd
 Nomad Television Productions Pty Ltd
 Nordisk Film International Sales
 Norstar Entertainment Inc
 North American Releasing Inc
 North South Productions Ltd
 Northway Productions Pty Ltd
 Norton Productions Ltd
 Norwegian Film Institute
 NRK Aktivum
 NRK (Norwegian Broadcasting Corporation)
 NSW Health
 Nu Image, Inc
 NVC Arts Ltd
 Ö Filmproduktion Frank Löprich & Katrin Schläpfer GmbH
 Oakum Productions Ltd
 Oasis Pictures Inc
 OCP Ltd
 Octin Pty Ltd
 Odyssey Pictures Corporation
 Offshore Productions Pty Ltd
 OIBO
 Olsen Levy Productions Pty Ltd
 Omar Khayam Film Productions
 Omega Entertainment Ltd
 Omnicron Productions Ltd
 One World Films Pty Ltd
 Onset Productions Pty Ltd
 Open Eye Pty Ltd
 Open Learning Agency of Australia Pty Ltd
 Open Training & Education Network Media Production Unit
 Opera Australia
 Oracle Pictures Pty Ltd
 Orana Films Pty Ltd
 Orion Pictures Corporation
 Overseas Film Group
 Oxnard Pty Limited
 Pacem Distribution International, LLC
 Padam Rag TV International
 Palace Entertainment Corporation Pty Ltd
 Palan Music Publishing Ltd
 Palestine Housing Rights Movement
 Pandora Cinema
 Panoramica Pty Ltd
 Paragon International
 Paramount Pictures (Australia) Pty Ltd
 Parham Media Productions
 Parliament of Australia
 Parrot Management Pty Ltd
 Passport International Productions Inc
 Pathe Image
 Pathe Television
 Patricia Fiske
 Paul De Lange
 Paul Stekler
 Pavilion International Ltd
 PC Films Corporation

PDJ Productions
 Pedro Maso Producciones
 Cinematograficas, SA
 Penisun Pty Ltd trading as Squawk
 Media
 Per Holst Film A/S
 Peter Curson
 Peter Downer & Associates Pty Ltd
 Peter Friedman
 Peter Gerard Flood
 Peter John Jarman
 Peter Neale Drama Services Pty Ltd
 Peter Singer
 Phillip Ellery for The Ellery Family Trust
 Phillip Emanuel Productions Pty Ltd
 Picture Music International
 Picture Palace Pty Ltd
 Picture Start Inc
 Pig Hell Productions Pty Ltd
 Pike Fitzpatrick Nominees Pty Ltd trading
 as RONIN FILMS
 Pilgrim International Ltd
 Pilgrim Pictures Ltd
 Pilot Film & Television Productions Ltd
 Piper Films Pty Ltd
 Plaisance - Sipp
 Planet 24 Limited
 Playbox Theatre
 Playboy Entertainment Group, Inc
 Plumb Productions Ltd
 PM Entertainment
 Pointblank Pictures Pty Ltd
 Polygram Holdings Inc
 Polygram Video International Ltd
 Popwing Pty Ltd
 Porchlight Films Pty Ltd
 Poseidon Film Distributors Ltd
 Praesens-Film AG
 Precious Capers Pty Ltd
 President Films
 Preston Laing Productions Ltd
 Prime Television Limited
 Prime Time Productions Holdings Pty Ltd
 Primetime Television Associates Ltd
 Pro Films (#3) Pty Ltd
 Pro Television Pty Limited
 Promark Entertainment Group
 Prospect Productions Pty Ltd
 Prospero Productions Pty Ltd
 PT Inter Ksatrya Film
 PT Satrya Perkasa Esthetika Film
 Public Affairs Television, Inc
 Puzon Creative Entertainment of America
 Quadra Entertainment, Inc
 Queensland Television Limited
 R and S Hore Pty Ltd
 R D B Whalley
 R Navaratnam trading as Strathfield
 International
 Rachel Berger
 Radio Netherlands Television - RNTV
 Radio Pictures Pty Ltd
 Radioactive Films Inc
 Radiotelevision Espanola, RTVE
 RAI International
 RAI Trade SpA
 Ralph Umard
 Ramsey Films Pty Ltd
 Randy Holland
 Rank Film Distributors Limited
 Rantan Productions Pty Ltd
 Rapi Films
 Rashomon Pty Ltd t/a Mail & Guardian
 Television
 Ray Atkinson Multi-Media Marketing Ltd
 RB Films Pty Ltd
 Realworld Pictures Pty Ltd
 Red Sky Film and Television Limited
 Redwood Communications LLC
 Reel Movies International, Inc
 Regina Ziegler Filmproduktion
 Reid & Puskar Pty Limited
 Renn Productions
 Republic Entertainment Inc
 Reuters Australia Pty Ltd
 Richard Drewett Productions Ltd
 Richard Lopes
 Richard Moore trading as RM Films
 Richard Raftos
 Richard Sowada trading as Dakota Films
 Richard Turner
 Richley Communications Pty Ltd
 Rick Raftos Management Pty Ltd
 Riff International Production SA
 Rincovision Ringier AG
 Rishi Films Ltd
 Rive Gauche International Television
 RKO Pictures
 RM Associates International Ltd
 Roadshow Coote & Carroll Pty Ltd
 Roadshow Entertainment Pty Ltd
 Roadshow Film Distributors Pty Ltd
 Roadshow Television Pty Ltd
 Rob McAuley Productions Pty Ltd
 Robert A Cocks
 Robert Greenberg
 Robert Raymond
 Robert Richter
 Robyn Patricia Stone
 Robyn Williams
 Rock Eisteddfod Challenge Pty Ltd
 Roger Laurence Kitching
 Roger Whittaker Films Pty Ltd
 Roissy Films
 Rolf Bergman
 Ron Taylor Film Productions Pty Ltd
 Ron V Brown International
 Roos A Molleman-De Vries
 Rosalind Gillespie
 Ross Isaacs
 Royal College of Art
 Royal Melbourne Institute of Technology
 Royal Oaks Entertainment
 RT Films Pty Ltd
 Ruggero Gabbai
 Ruppert Gabriel

Russell Taylor
 Rutherford Films Holdings Pty Ltd
 Rymer Bayly Watson Pty Ltd
 Rysher Entertainment, Inc
 S Entertainment
 S4C
 Sami Sarkis
 Samson Film Services Limited
 Sandra Carter Enterprises Inc trading as
 Sandra Carter Productions
 Sandy Harbutt
 Sarah Stephens t/a Fertile Films
 Sarbani Bhattacharya
 SARL Les Films Du Village
 Sasha Hadden
 Science Video Service
 Scott Hicks
 Scottish Television Enterprises
 Screen Ventures Ltd
 Screenlife Incorporated
 Seaflower Holdings Pty Ltd
 Senso Film, Georg Kilian
 Sensory Perception Pty Ltd
 Serendipity Productions Pty Ltd
 Serious Productions Pty Ltd
 SFP Productions
 SHK Sarl
 Shochiku Co Ltd
 Showboat Productions Pty Ltd
 Showcase Entertainment, Inc
 Simon Atkins
 Simon Harry Dodd
 Simpson Le Mesurier Films Pty Ltd
 Singing Nomads Productions Pty Ltd
 Siobhan McHugh
 Sky Visuals Pty Limited
 Smart Egg Pictures Inc
 Smiley Films Pty Ltd
 Smith Street Films Pty Limited
 Society for the Study of Myth and
 Tradition Inc
 SOFIDOC Production sa/nv
 Sogepaq SA
 Somers Carroll Pty Ltd
 Something to Sing About Pty Ltd
 Sonja Armstrong Productions Pty Ltd
 Sony Music Entertainment Inc
 Sorena Productions Pty Ltd
 Sorena Pty Ltd
 SOS Pictures
 Soundsense Pty Ltd
 South Australian Film Corporation
 South Australian Telecasters Ltd
 South Pacific Pictures Limited
 Southern Cross Communications Ltd
 Southern Star Enterprises
 Southern Star Entertainment Pty Ltd
 Southern Star Film Sales Pty Ltd
 Southern Star Group Inc
 Southern Star Group Limited
 Southern Star Group Pty Ltd
 Southern Star Operations Pty Ltd
 Special Broadcasting Service
 Spectacle Productions Ltd
 Spelling Films International, Inc
 Spiderweb Productions Ltd
 Spirit 2000 Productions Pty Ltd
 SR Programs International Ltd
 Starway International Corporation
 Stella Motion Pictures Pty Ltd
 Stephanie McCarthy
 Stephen J Cannell Productions Inc
 Stephen M Trombley
 Stephen Ramsey
 Stichting C Sales
 Stichting Jura Filmprodukties
 Stockley Chase Productions Pty Ltd
 Stormbringer Films Pty Ltd
 Studio Hamburg Atelier GmbH
 Suissimage, Swiss Author's Rights
 Society for Audiovisual Works
 Sullivan Entertainment International
 Summer Hill Films Pty Ltd
 Sunburnt Pictures Pty Ltd
 Sunny Film USA, Inc
 Sunshine Television Network Limited
 Surf Film s.r.l.
 Survival Anglia
 Susan Jill Bridge
 Swan Television & Radio Broadcasters
 Pty Ltd
 Swedish Film Institute
 Swinburne University of Technology
 Sydney Educational Broadcasting Ltd t/a
 Radio 2SER-FM
 Sydney Neter Distribution
 Sylvie Le Clezio
 Symos Communications Pty Ltd
 Takes On Productions
 Taman Sari Productions Pty Ltd
 Tapestry Films, Inc
 Tapestry International Ltd
 Tarantula Pty Ltd t/a Stoney Creek
 Productions
 Target Distribution Ltd
 Tasmanian Department of Education,
 Community
 and Cultural Development
 Taxi Productions
 Tele - Images
 Telecasters Australia Limited
 Telemondis, SA
 Telepool Europaisches
 Fernsehprogrammkontor GmbH
 Television and Film Productions Ltd
 Television New Zealand Ltd
 Television Sport and Leisure Ltd
 Telewizja Polska SA
 Tell Tale Films Pty Ltd
 Telling Pictures Inc
 Tenchijin Productions Pty Ltd
 Teodoro Maniaci
 TF 1 International
 Thames Television International Ltd
 Thames Television Limited
 The Arts Council of England

The Battleships Pty Ltd
 The Best Picture Show Co Pty Ltd
 The Big Byte Productions Pty Ltd
 The Big Red Pty Ltd
 The Cameron Creswell Agency Pty Ltd
 The Coproduction Office
 The Dean, Department of Aboriginal and
 Islander Studies
 The Dean, Department of Aboriginal and
 Islander Studies
 The Gibson Group Limited
 The Globe Film Co Pty Ltd
 The Japan Foundation
 The Liners Pty Ltd
 The Movie House Sales Company Ltd
 The National Press Club Inc
 The Notion Picture Company Pty Ltd
 The Ontario Educational Communications
 Authority
 The Refugee Council
 The Shooting Gallery
 Theodoros Angelopoulos
 Thought Films Pty Ltd
 Thrain Australia Pty Ltd
 Tim Gruchy
 Tintern Trial Pty Ltd trading as Premium
 Films
 Titus Films (Australia) Pty Ltd
 Titus Films Pty Ltd
 TMS Distribution Pty Ltd
 TNS Productions
 Toho International Co Ltd
 Tom Burstall
 Tomorrow Film Corp.
 Top Shelf Productions Limited
 Topaz Productions Ltd
 Total Film & Television Pty Ltd
 Touchdown Productions Ltd
 Tracey Geraldine Meredith
 Tracey Holloway
 Trans Atlantic Entertainment
 Trans World Films Ltd
 Trans World International Pty Ltd
 Transatlantic Film Production &
 Distribution Company Limited
 Transit Film GmbH
 Trevor Haysom Enterprise Ltd
 Trident Releasing, Inc
 Trimark Pictures, Inc.
 Trish FitzSimons t/a Wisteria Films
 Tristram Miall Films Pty Ltd
 Troma, Inc
 Trout Films Pty Ltd
 True Stories
 Trustees Of Sisters of St Joseph
 TSC Film Distribution Corporation
 TSI - Swiss Television
 Turner Pictures Worldwide Inc
 TV 2/Danmark
 TV Novosti
 TVA International Inc
 TVF International
 TVS Television Limited
 TVW Enterprises Ltd
 Twentieth Century Fox Film Corporation
 (Australia) Pty Ltd
 Tyburn Film Productions Limited
 Tyrone Productions Ltd
 UGC DA International
 UGC UK Ltd
 Ultrafilms Pty Ltd
 Ulyssee Entertainment, Inc
 United Artists (Australia) Pty Ltd
 United Media Services Pty Ltd
 Universal Studios International BV
 Universal TV Australia Pty Ltd
 University of Auckland
 University of Western Sydney,
 Hawkesbury
 University of Wisconsin Board of
 Regents WHA-TV
 University of Wollongong
 V/K - SovExportFilm
 Valhalla Holdings Pty Ltd
 Valhalla Productions Ltd
 Van Dielen / Bernstein GmbH
 Victoria Strong
 Victorian Tertiary Admissions Centre
 Videofilm Producers International Ltd
 Video Images Pty Ltd
 Video Verite
 Vietnam Film Export - Import and
 Distribution Company (FaFilm Vietnam)
 View Films Pty Ltd
 Vine International Pictures Ltd
 Viscopy Ltd
 Vision International
 Visual Images Pty Ltd
 Vivid Pictures Pty Ltd
 Vixen Films Pty Ltd
 Vue Pty Ltd
 Warlpiri Media Association Inc
 Warner Bros International Television
 Distribution (a division of Time Warner
 Entertainment Company, LP)
 Watchmaker Productions Limited
 Weis Films Pty Ltd T/A Generation Films
 West City Films, Inc
 West Coast Pictures Pty Ltd
 West Side Studios, Inc
 Western International Syndication
 Western Radio Broadcasters Inc
 WGBH Educational Foundation
 Whamo Entertainment, Inc
 White Crane Films Limited
 WHY Y Inc
 Wild Heart Productions Pty Ltd
 Wild Visuals Pty Ltd
 Wildcat Films Ltd
 Wildfilm Australia Pty Ltd
 Wildfire Films International Pty Ltd
 William J Kentridge
 WIN Television VIC Pty Ltd
 Women Make Movies Inc
 Women of the Earth Pty Ltd
 WorkWeek Television Productions Inc

World Film Services Inc
World International Network, LLC
World Media Sales
World Wide Group Ltd
Worldview Pictures Ltd
Worldvision Enterprises Inc
Worldwide Television News Corporation
(WTN)
WOSU-TV
WQED Pittsburgh, Inc
Writers Guild of Japan
Xingu Inc
Yarra Bank Films Pty Ltd
Yeah Inc
York Films Ltd
Yorkshire Tyne Tees Enterprises Ltd
Yorkshire Tyne Tees Television Ltd
Youngheart Productions Pty Ltd
Yu Hsiu Ching
Zarwot Pty Ltd
ZDF
Zenith Productions Limited
Zoic Films Pty Ltd