



European Commission Green Paper

Preparing for a Fully Converged Audiovisual World: Growth, Creation and Values

SAA, FERA, FSE Joint Contribution

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The **Society of Audiovisual Authors (SAA)** is the association of European collective management organisations representing audiovisual authors' rights. Its 25 member societies in 18 European countries manage the authors' rights of over 120,000 European film and television screenwriters and directors.

FERA (Federation of European Film Directors) is an international organisation that represents 39 directors' associations and approximately 20,000 film and television directors from 29 countries, speaking in the European arena for their economic, cultural and creative rights.

The Federation of Screenwriters in Europe (FSE) is the voice in Europe for more than 6,000 professional screenwriters working mainly in the film and television industry. It is a federation of currently 25 associations, guilds and unions of screenwriters in 19 countries.

FERA, FSE and SAA welcome the publication of the Green Paper on *Preparing for a fully converged audiovisual world: Growth, Creation and Values* and the consultation process it opened. Digital technology and the internet continue to rapidly change the way in which audiovisual works are produced, marketed and distributed to the audience, under the pressure of consumers increasingly expecting to be able to watch anything, anywhere, anytime, and on any device.

We would, however, also like to take this opportunity to express our regret that the European Commission has not followed up on its Green Paper on *the Online Distribution of Audiovisual Works* and that this current consultation fails to address any authors' rights or copyright issues. While this consultation is welcome, there is a need, alongside the current Licences for Europe stakeholder dialogue, for the Commission to continue its dedicated work on audiovisual issues. The issue of the remuneration of audiovisual authors, which was clearly raised in the aforementioned Green Paper on the Online Distribution of Audiovisual Works, must not be allowed to slip off the European Commission's list of action areas and we hope to be able to look forward to future announcements in this area.

One notable omission in the questions of the Green Paper on *Preparing for a fully converged audiovisual world: Growth, Creation and Values* is the value of defending Europe's cultural diversity, which is only briefly mentioned at a couple of points in the document.

The audiovisual sector is one of most prominent examples of Europe's cultural diversity, and proof of how cultural diversity and business can go hand in hand with the help of sophisticated cultural policies. For this to continue to be the case as the European single digital market develops, there needs to be an adapted legal framework that will help preserve and develop the visibility of high quality European works and support the promotion of EU production and distribution. This support must come through mechanisms that help guarantee financing of works and respect the works and the authors' rights therein. Active promotion is necessary in a converged world of near unlimited choice to ensure the real visibility and accessibility of European works.

While not mentioned in the Green Paper, converged fiscal policy should also be considered through harmonised reduced VAT rates on all cultural products irrespective of their access method (e.g. cinema tickets vs. Blu Rays vs. downloads).

The independence of Europe's media needs to be preserved and a future for European players guaranteed. This will guarantee media pluralism but it is also important for authors who do not want to cater for global players only.

SAA, FERA and FSE fully believe that converged media represents an opportunity for European screenwriters and directors as beyond the technical issues it raises, it reinforces the structural trend that professional content is king. Traditional media and new services, whether hardware driven or Over-The-Top (OTT) services, rely on professional content to develop any long term sustainable activity. The creativity and experience of European screenwriters and directors to tell stories in moving images is recognised worldwide. New services and converged media can help them reach new audiences and redefine their remuneration flows thanks to the increased accuracy of exploitation data. However, for remuneration to flow, Europe's authors must be able to work and that means ensuring the continued development of European production and distribution in a converged world if we want to avoid a brain drain of European talent.

GROWTH AND INNOVATION

Market considerations

1. What are the factors that enable US companies to establish a successful presence in the fragmented EU market despite language and cultural barriers, while many EU companies struggle? What are the factors hindering EU companies?

Firstly we have to respectfully disagree with the assertions made by the Green Paper with regards to this question. US companies in Europe do not operate in ***a borderless market enabling them to raise sizeable budgets and take advantage of economies of scale*** nor do they offer ***audiovisual content online without territorial access restrictions*** (page 5).

Making this comparison between US and EU companies is like comparing apples and oranges, for the following reasons:

1. US production companies have established a successful presence in most if not all EU member states and beyond. This does not mean they have a borderless European market, but rather a long established national presence, competing on each local market. New services arriving in Europe have, without exception, opened up territory by territory, expanding and setting up a local presence in each territory over time (e.g. Netflix ([apparently](#) caught out using fan subtitles in

Finland), HBO, iTunes).

2. Any economy of scale is back home in the US where they do have a borderless monolingual market nationwide. Taking into account the size of the US market, the companies which have developed their activities and presence in the US market have the size, capitalisation and investment capacity to develop in any other territory, including in the European ones. This scale effect is of course added by their global presence. New market entrants benefit from this US home-market scale to generate a buzz around their product/service before launching in other territories.
3. US companies enjoy a well established market demand for their products that have in fact become universal in their appeal.
4. This dominant market position is consolidated by their massive marketing spend, which makes any European effort pale in comparison.
5. While seeking pre-financing partners is becoming the norm, also for many US productions, they have traditionally relied on a different funding model where a studio or a cable company will fully finance the production. Those instances allow them more freedom to be flexible in terms of release strategies - provided it makes business sense.
6. The TV markets are fundamentally different. The US has a tradition of private cable television (that fully finance a lot of the leading quality TV shows that are very successful in Europe) that run alongside free to air, (excessively) advertising supported, services. Europe, however, has a network of public service broadcasters, alongside pay TV operators, who have long been supporters of Europe's cultural diversity through their investments in local productions targeted at local audiences. Given each country's limited scale, national broadcasters can only commission or partially fund a limited amount of independent productions and only produce a limited amount in-house which is a comparative disadvantage for EU companies. It would be interesting to see a comparison of average pay-TV subscriptions for each continent.

It is wishful thinking that the same preconditions could be established for EU companies.

2. What are the factors affecting the availability of premium content? Are there currently practices relating to premium content at wholesale level which affect market access and sustainable business operations? If so, what is the impact on consumers? Is there a need for regulatory intervention beyond the application of existing competition rules?

The Green Paper rightly points out that *premium content (major sport events and successful recently released films, so-called blockbusters) generates a high demand and significant revenues in the audiovisual sector* (page 6).

The Green Paper further acknowledges that *exclusive deals between platform operators and content providers have formed the basis for content producers to amortise their investments* (page 6) and also for market players to differentiate their offers.

Film release strategies at global level are very different for a US blockbuster and a European film. While for US blockbusters it is usually part of an initial marketing plan which devotes at

least the same amount of money to promotion as to production, for European Films it is more an issue of pre-sales of different territories before the film is made (at film markets and film festivals for example) and of further opportunities if the film is doing well in its home country. Therefore, it usually takes more time for a European film to reach its full potential audience at global level than for a US blockbuster. In this context, the pressure to accelerate film releases and exploit them before they are illegally available online is more detrimental to European films as it limits the sometimes slow emergence of “word of mouth” or “buzz” that is essential for niche films which do not have the marketing capacities of US blockbusters.

Release windows on different media (theatrical release, DVD and Blu Ray, VOD, pay-TV, free-TV, etc.) are an integral part of the business model of the audiovisual sector and like most decisions related to the exploitation of a film (or any audiovisual work), the periods are decided at national level. In most European countries, there are professional agreements with rights holders or commercial agreements tailored to each particular film to maximize its exploitation, its visibility for the audience and the revenues generated by each form of exploitation.

The current release windows are usually related to obligations towards financing partners of the film. State aid rules allow for only 50% public funding, which means that the producer must find the remaining 50%. This consists to a large degree of pre-sales, which is simply “borrowing” from the future earnings of the film in the various distribution channels, primarily cinema distribution (minimum guarantees) and broadcasting fees.

Today these financing partners naturally demand to have exclusive windows in return for advance payments, and if online players do not have the same funding obligations, but stand to earn money at the expense of the financing partners, this jeopardizes the entire ecosystem.

We support flexibility in release windows so long as the question of how film production and distribution will be funded is simultaneously addressed. It is also important to acknowledge that a film’s market value is intimately linked to its initial theatrical release and crucial to maximising its performance in subsequent distribution channels.

While the Green Paper notes that ***increased content offer in terms of quantity and diversity is changing the entertainment landscape*** (page 6), we would like to reiterate that it is **professional quality content** that mainly drives the real growth in both the offline and online market.

3. Are there obstacles which require regulatory action on access to platforms?

There are two aspects to any potential regulatory action on access to platforms. Equally, there are now hardware driven and Over-The-Top (OTT) platforms which may need to be considered differently.

First of all, competition law should be satisfactorily implemented to ensure that vertically integrated companies are not able to abuse their dominant position and limit access of other services or content providers to platforms.

Secondly, it may be deemed necessary, in the interests of media pluralism and the promotion of cultural diversity, to implement ‘must-carry’ legislation to ensure that general interest broadcasters are not shut out of new hardware and application driven platforms.

At this stage or in the foreseeable future it would not be appropriate to regulate access to OTT platforms. These platforms will need to find their place in the value chain and compete for premium content. It is interesting to see some starting to invest in original creations as a way of securing premium content, and subsequently operating within the traditional industry framework through licensing (e.g. Netflix with House of Cards, subsequently licensed to Canal+).

The current practice, however, is that online platforms mostly acquire non-exclusive licenses, but there is a need to rethink the role of VOD services/online platforms at different stages in the value chain.

The contracting parties have the freedom to enter into arrangements that are underpinned by a sustainable economic model.

FINANCING MODELS

4. Do the current AVMSD requirements provide the best way to promote the creation, distribution, availability and market appeal of European works?

Yes. We believe in the principle that all media or platforms, offline and online, that benefit from audiovisual works should contribute to the funding and distribution costs of new production. This is recognised in the AVMS Directive. The artistic merit, technical quality and diversity of the films and television programmes we make in Europe are the pre-conditional criteria for growth, and any revised legislation must have the aim of encouraging and sustaining a healthy European audiovisual sector that will in turn continue to guarantee Europe's cultural diversity.

The presence and visibility of European works on all online platforms is an essential part of the AVMS Directive, in particular Article 13 regarding the production of and access to European works, and should be strictly and carefully implemented by all Member States, which is regrettably not yet the case. Especially publicly funded online catalogues and services must be required to include a significant proportion of European works, and present them prominently. In a converged world of access to an ever larger array of audiovisual works, it is essential that 'discoverability' of European works is guaranteed.

5. How will convergence and changing consumer behaviour influence the current system of content financing? How are different actors in the new value chain contributing to financing?

Release windows will inevitably change as online use generates more economic value, though it is important to recognize the superior importance of offline partners to the return of investment so far. VOD's current turnover is currently very small, and it would be unfair to allow the new audiovisual media services to profit from European audiovisual works without investing a fair share of their turnover in the production and release of new works. Some have started to do so, but it would seem early to call this a trend. It is however already clear that the revenues generated by online platforms for each single title is only ever going to be a fraction of what the same revenues have traditionally been for DVD releases. This is a dramatic loss of value that will greatly affect each film's ability to secure initial funding to get made, and to be profitable.

We strongly believe, as provided for in Article 13 of the AVMS directive, that financial

contributions from online services should consist of the obligation to invest a share of the turnover of the service concerned in the production and rights acquisition of European works (the investment rate could increase according to the turnover) and/or by contributing to national film and audiovisual production funds. The implementation of this so far has been insufficient.

We would like to underline that the investment and financing of European production is complementary to the remuneration of authors and should not be perceived as limiting the involvement of new distributors and services in the remuneration of authors. Audiovisual authors should be remunerated for every exploitation of their work.

Interoperability of Connected TV

6. Is there a need for EU action to overcome actual or potential fragmentation and ensure interoperability across borders? Is there a need to develop new or updated standards in the market?

We understand that the current variety of standards means that producers have to supply films in a variety of different formats to cover all of the different media including among different VOD platforms (e.g. the requested formats for iTunes, Universciné, and a cable VOD supplier in Belgium are all different). We have an example of a broadcaster in one Member State which supports 60 different technology platforms for its catch up TV service. While we are not opposed to competition between standards per se (and this is certainly nothing new – BluRay vs HD, VHS vs Betamax), we would note that in an already fragmented European audiovisual production and distribution market, extra costs such as producing significant numbers of different formats (and the examples above concern one country only) can only have a detrimental effect on the circulation of works.

More generally, it is important that consumers have access to interoperable systems that do not lock consumers into a single operator or group of operators but instead enable them to access the full range of services and works available. This will also help guarantee access to Europe's cultural diversity.

Infrastructure and Spectrum

7. How relevant are differences between individual platforms delivering content (e.g. terrestrial and satellite broadcasting, wired broadband including cable, mobile broadband) in terms of consumer experience and of public interest obligations?

8. What frequency allocation and sharing models can facilitate development opportunities for broadcasting, mobile broadband and other applications (such as programme-making equipment) carried in the same frequency bands?

9. What specific research needs with regard to spectrum have to be addressed to facilitate such development?

Our organisations are technology agnostic regarding the way that Europe's audiovisual works are brought to their audience. However, with the arrival of 4k definition televisions [[source](#)] which can truly bring the creators' vision to the home viewer, the integrity of the work needs to be guaranteed. The technical delivery system must be able to deliver without a loss of quality or damaging the user experience. Current network resources are not sufficient to guarantee quality viewing at current resolutions (HD) across the EU (often limited to cities).

Films pixelising due to insufficient bandwidth or frequently buffering does not respect the authors creative vision or provide a satisfactory user experience.

In this regard there may also be an impact on net neutrality / traffic management. Europe needs to ensure that access to European content is not sacrificed due to international vertically integrated companies dictating which content can reach European consumers to which degree of quality (either on the basis of prioritising their own subsidiaries' services or content or on the basis of commercial deals). There are already examples of throttling (see the SFR-YouTube case in France) and there are already questions in the US as to whether some cable operators are prioritising their own video content over other suppliers [[source](#)].

VALUES

Regulatory framework

10. Given convergence between media, is there evidence of market distortion caused by the regulatory differentiation between linear and non-linear services? If yes, what would be the best way to tackle these distortions while protecting the values underpinning the EU regulatory framework for audiovisual media services?

The inclusion of non-linear services in the AVMS Directive in 2007 was based on the need for a lighter regulation for these services than for traditional audiovisual services to facilitate their take-up. It is legitimate, after a certain period of time of implementation, to ask whether this lighter regulation for non-linear services is still needed. This can be done by looking at the development of those services and whether their development has resulted (or not) in market distortions to the detriment of traditional services.

A second question relates to the limited scope of the extension of the AVMS Directive to on-demand services only in the online environment. Is this limitation to on-demand services not too narrow and does it leave out important online services which make available audiovisual works to the audience?

Impact assessments should be conducted on both issues to identify possible market distortions. Without wanting to predict the conclusions of such impact assessments, it would seem obvious to us that in the case of any distortion, the principles of Articles 13, 16 and 17 should be maintained and constitute the minimum basis for any audiovisual media service. There should certainly be no lowering of AVMS Directive standards. We would welcome more pressure on Member States as to how they implement the Directive (and article 13 in particular) and more strict application of the articles 13, 16 and 17 to online players.

We noted with interest Commissioner De Gucht's statement in June regarding the Transatlantic Trade and Investment Partnership (TTIP) - "What is really at stake in these negotiations on audiovisual is the so-called digital evolution or revolution in those media," "There is no European legislation on this at this moment in time, [while] there is legislation on online and video-on-demand." [[Source](#)]. It is not entirely clear what Commissioner De Gucht means with this statement. After years of political and financial investment in Europe's cultural diversity through, among others, its audiovisual policy, there should be no attempts to undermine any gaps in European audiovisual policy during trade negotiations. We are pleased to note here that audiovisual has been formally excluded from the negotiation mandate of the TTIP.

An important market distortion caused by the regulatory differentiation between linear and non-linear services relates to the different VAT rates for the delivery of audiovisual works to the audience depending on the media. While cinema tickets and broadcasting services can benefit from a reduced VAT rate, online delivery is not eligible for such a reduced rate according to European legislation. The absence of a harmonised reduced VAT rate on audiovisual works, irrespective of their access method, is detrimental to the take off of European VOD services.

11. Is there a need to adapt the definition of AVMS providers and / or the scope of the AVMSD, in order to make those currently outside subject to part or all of the obligations of the AVMSD or are there other ways to protect values? In which areas could emphasis be given to self/co-regulation?

SAA, FERA and FSE believe that it is too early to consider a revision of the AVMS Directive as we do not have the full results of its implementation. In addition to this, the current penetration levels of used connected devices means that no immediate action is necessary.

However, there are clearly services, such as YouTube or Dailymotion, that in an increasingly converged world are used by consumers in a manner increasingly resembling that of a video on demand service. YouTube has now launched paid subscriptions for certain channels in the USA, playlist functions enable 'lean back' linear viewing, and more and more traditional media companies are investing in YouTube 'networks' (e.g. Disney buying Awesomeness TV through its Dreamworks subsidiary). Third party websites that editorialise licensed YouTube content (whether through embedding or through linking) may also need to be considered. Even the vocabulary of 'channels' and 'networks' suggests a clear link to more traditional services that are subject to the AVMS Directive.

While the key question of 'editorialisation' remains, we believe that the changes mentioned above represent part of a steady shift of these services towards a level of editorialisation and reliance on professional content organised in channels that will also see them (or at least distinct parts of their service) shift from being outside of the AVMS Directive to inside it. In the absence of recognition of this shift from national authorities or regulators, then action may well be required to ensure that AVMSD requirements such as the promotion and/or financing of European works are enforced. The recognition of such a shift would also have an impact on the application of certain elements of the e-commerce Directive to these services, notably regarding respect of authors' rights.

12. What would be the impact of a change of the audiovisual regulatory approach on the country of origin principle and therefore on the single market?

The country of origin principle can only apply when equal or harmonised conditions and rules exist in the different Member States so as to avoid market distortions. In the AVMSD, the country of origin principle goes hand in hand with a set of minimum common rules covering aspects like advertising, protection of minors and promotion of European audiovisual works. This is also the case for the E-Commerce Directive which approximates national provisions on information society services relating to the establishment of service providers, commercial communication, electronic contracts, liability of intermediaries, etc. so that the country of origin principle can apply. Better or stricter implementation of these rules or more common rules make the country of origin principle legitimate and applicable. On the contrary, the absence of harmonisation associated with the country of origin principle can only create market distortions.

Modern digital distribution and the arrival of cloud computing, which renders the country of origin of the transmission irrelevant, have undermined the Satellite provisions of the 1993 Satellite and Cable Directive as a template for Europe wide digital rights clearance. It has also proved problematic as certain broadcasters circumvent national regulations by transmitting from another country (i.e. TV3 avoids advertising regulations in the Nordic countries by being based in the UK).

In this context, we strongly back the retention of the territoriality principle for the copyright licensing of all forms of communication to the public of audiovisual works, including retransmission and simultaneous transmission (cable provisions of the 1993 Satellite and Cable Directive) and the payments to authors that it ensures.

13. Does increased convergence in the audio-visual landscape test the relationship between the provisions of the AVMSD and the E-Commerce Directive in new ways and in which areas? Could you provide practical examples of that?

The AVMS Directive and the E-Commerce Directive have clearly different objectives. The fact that there are services that can be subject to both Directives is in no way problematic.

As mentioned above (see question 11), we believe there is a steady shift in a number of services that currently fall outside of the AVMS Directive that will ultimately lead them to be subject to the Directive. We believe that this same shift will also see parts of the e-commerce Directive, notably those parts concerning respect of authors' rights apply to these services (or parts thereof). In the absence of recognition of this shift from national authorities or regulators, then action may well be required to ensure that the relevant parts of the e-commerce Directive can be enforced.

Both Directives should be subject to frequent evaluations to ensure that evolutions in technology or commercial practices do not prevent their policy objectives being achieved. While hypothetical, if the arrival of smart TVs ultimately leads to a move away from channel based access to application based access, then the policy objectives of financing and providing visibility to European works, among many others, still need to be guaranteed.

14. What initiatives at European level could contribute to improve the level of media literacy across Europe?

Media literacy and the ability for consumers to be able to understand and analyse the media in a converged world is clearly important and something that SAA, FERA and FSE supports.

Media Freedom and Pluralism

15. Should the possibility of pre-defining choice through filtering mechanisms, including in search facilities, be subject to public intervention at EU level?

Filtering mechanisms may be acceptable if the choice is pre-defined by the consumer or as part of legitimate policy objective by a Member State.

Commercial or profile based filtering, however, must not be allowed to limit consumers' access to a broad array of content and opinions and indeed intervention may be deemed necessary to prevent such filtering. The question may also need asking – how do you guarantee the prominence in algorithm based search results and recommendations? A VOD

operator should not be able to avoid its AVMS Directive obligations regarding visibility of European works on the basis that it uses algorithm based recommendations [[source](#), or Eli Pariser's Ted talk on "[the Filter Bubble](#)"].

This section of the text focuses on the filtering of licensed content. Filtering mechanisms may however be useful in a converged world to counter the commercial exploitation of unlicensed copyright protected works. Currently a simple search in YouTube for 'full film' brings up a list of protected works available in their entirety. In a converged environment where the access to content is available seamlessly on a household's main screen via the web, filtering of unlicensed commercially operating domains could be useful.

It is interesting to note Google's cooperation with rightsholders in this area to remove certain terms (a sort of filtering) from its autocomplete function. The UK has also recently seen the courts implement filtering on certain domains that are judged to provide access to unlicensed content.

16. What should be the scope of existing regulation on access (art. 6 Access Directive) and universal service (art. 31 Universal Service Directive) in view of increasing convergence of linear and non-linear services on common platforms? In a convergent broadcast/broadband environment, are there specific needs to ensure the accessibility and the convenience to find and enjoy 'general interest content'?

As mentioned in the response to question 13, evolutions in technology or commercial practices should not prevent EU policy objectives from being achieved. The challenges created by opening a household's main screen to the seemingly boundless content of the internet will undoubtedly provide challenges for national regulators and authorities. It will also likely see the arrival of new 'editors' trying to provide consumers with ways of accessing the information most relevant to them. The importance of prominence of European media (and in turn European works) may well become more and more important in a world where 'editors' operate on a commercial basis or as part of vertically integrated companies that could prioritise their own content. The means of ensuring this will undoubtedly become more complicated (e.g. could you/would you/should you oblige a search engine to prioritise European results for a query, how will the landing page of connected TVs be decided?).

There should be a must carry requirement for broadcasters and services deemed as guaranteeing 'general interest content'. Member States may also want to be able to extend must carry requirements from network operators to hardware manufacturers.

The independence of the EU's media must be preserved and the continued presence of EU players ensured as this will help guarantee the future of Europe's cultural diversity. It is important for authors to not just cater for global players but to be able to cater for their local markets.

Commercial communications

17. Will the current rules of the AVMSD regarding commercial communications still be appropriate when a converged experience progressively becomes reality? Could you provide some concrete example?

The current rules regarding commercial communications are in many ways satisfactory.

SAA, FERA and FSE feel that there must continue to be a clear distinction between creative works and any advertising in a converged media environment. The rules for linear media have been built over a number of years and are appropriate. We would not want to see a reduction in the regulations regarding commercial communications in order to align them with the (weaker) requirements for non-linear services.

Advertising on online services is on the surge and new techniques are developing, with some of them questioning the AVMSD principles. We are already seeing advertising being inserted automatically into user generated video sites (both at the beginning and midway through videos) and overlays appearing. Sometimes the advertising length is disproportionate compared to the duration of the viewed content. These are clearly not in line with the objectives of the AVMS Directive and may need to be considered further as penetration of connected devices increases.

The issue of advertising supplied through second or third screens may also need to be considered in future. If these adverts are linked to linear services will they count towards the 20% per hour of the AVMS Directive? It may even be questionable as to whether advertising on second or third screens affects the integrity of a creative work being viewed on the main screen.

18. What regulatory instruments would be most appropriate to address the rapidly changing advertising techniques? Is there more scope for self/co-regulation?

It would be a shame for the European Commission to use technological progress to take a backward step on advertising regulations that have been developed over many years. If the Commission feels that action is necessary then it may wish to consider further consultation or a stakeholder dialogue to establish what future regulatory initiatives are necessary.

Furthermore, advertising in the form of product placement should not be allowed to have any impact on the creative process of the authors of a work.

19. Who should have the final say whether or not to accept commercial overlays or other novel techniques on screen?

We would first of all like to underline that commercial overlays may infringe the moral rights of the authors of an audiovisual work and certainly fail to maintain the integrity of the work.

Commercial overlays or other novel on-screen techniques should only be approved by those who have licensed the works and have a contractual relationship with (and hence a financial stake in) the creative chain. Commercial overlays added by simple hosting services or hardware providers on the basis of their ability to monitor the viewer's interests and what they are watching are not acceptable. These hosting services and hardware manufacturers should also not be able to take advantage of the success or popularity of a creative work through overlay advertising without the authorisation (and payment) of the licensed rightholder.

We do not have any comment on questions 20 to 25 on protection of minors and on questions 26 and 27 on accessibility for persons with disabilities.

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