



Cable Europe

Letter sent to Members of the European Parliament ahead of next week's vote in Strasbourg on the Sat Cab draft regulation.



Brussels, 7 December 2017

Dear Member of the European Parliament,

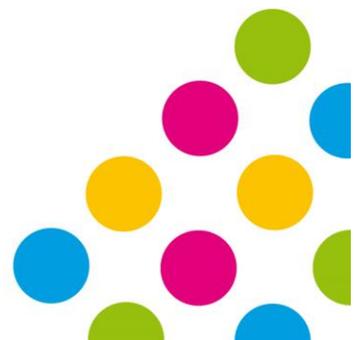
On December 12th you will be called upon to vote on the decision of the JURI committee to enter into inter-institutional negotiations on the so-called Sat Cab draft regulation¹.

Cable Europe calls on you to reject the JURI committee's decision to enter into inter-institutional negotiations on the basis of its report. The JURI report very disappointingly fails to endorse solutions that would modernise the licensing of retransmission of TV programmes which would enable 55.5 million cable subscribers in the EU to enjoy TV content on any device, in and out of their homes.

One of the outstanding problems of the JURI's report is the failure to adopt a technological-neutral approach to retransmission - in contrast with all opinion-giving committees.

The inclusion of the Internet in the retransmission rules would not call into question the territoriality principle of copyright as cable operators remain committed to licensing TV content on a territorial basis. In addition, and contrary to the general perception, the retransmission of TV programmes through the Internet does not *per se* raise security concerns, as cable operators

¹ Proposal for a regulation of the European Parliament and of the Council laying down rules on the exercise of copyright and related rights applicable to certain online transmissions of broadcasting organisations and retransmissions of television and radio programmes (2016/0284(COD)); rapporteur: Tiemo Wölken (A8-0378/2017)



already deploy solutions capable of securing end-to-end encryption. Clear evidence for excluding the Internet from retransmission based on security issues has not yet been adduced.

Another mistake of the JURI report is the inclusion of direct injection in the proposed regulation. Direct injection should not be regulated at EU level without an impact assessment.

Direct injection is a technically and legally very complex matter and there has been no prior analysis of this issue, notably in the Commission's impact assessment. Having in mind the Commission's better regulation agenda, we discourage any experimentation on this issue without a previous and comprehensive assessment of the impact of any future measure. We call on you to reject the JURI's decision on December 12th and remain available to provide further details on our position.

For further information on Cable Europe's position on this dossier, please click [here](#).

About Cable Europe

Cable Europe is the trade association that connects leading broadband cable TV operators and their national trade associations throughout the European Union. The regulatory and public policy activities of Cable Europe aim to promote and defend the industry's policies and business interests at European and international level. www.cable-europe.eu

This paper represents the views of the full members of Cable Europe, and not necessarily those of our associate members, partners or affiliates.