

# Request for an opinion: Assessment of the need to update the Finnish List of Events of Major Importance

## Nordic Entertainment Group Submission

### Who are we?

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Nordic Entertainment Group AB (NENT Group) is the Nordic region's leading entertainment provider. We entertain millions of people every day with our streaming services, TV channels and radio stations, and our production companies create content that is experienced around the world.

We are passionate about Nordic storytelling and have launched more than 80 original productions in just four years, with at least 30 originals set to premiere this year. We have a strong and well-balanced portfolio of sports rights that gives us the opportunity to broadcast more than 50,000 live hours of sports every year. NENT Group first launched in Finland in 1996 is available to Finnish consumers through our Viaplay and Viafree streaming services and "V" Pay TV channels.

### Listed Events

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NENT Group notes the Ministry for Transport and Communication's (the "**Ministry**") consultation on the Finnish List of Events of Major Importance (the "**List**") and is grateful for the opportunity to submit its position.

In the past, the aim of such List has been to ensure that events which have particular importance to, and resonance with, the Finnish population are made available to view "Free to air" for at least 90% of the Finnish population. The current List dates from 2007 and in light of developments in how people today watch media content, in particular the fast-accelerating increase in online viewing and the use of devices other than television sets, NENT Group considers this consultation to be relevant and timely.

The media landscape has changed dramatically in the past 13 years with technological convergence and increased competition from new entrants, including international online platforms, social networks and telecommunication providers. Today, consumers have a wide range of options and switch regularly between content services and platforms. Viewing habits have become more fragmented and niche media has become increasingly popular.

As viewing trends and technology are changing, the requirement for a television service to be viewed by 90% of the population may become increasingly hard to meet. Therefore, NENT Group is of the opinion that additional broadcast means, including OTT and IPTV, should be considered in order to future-proof the List as far as possible.

We also believe it is important that the Finnish measures appear appropriate in the light of the growing level of competition and the number of players. The List must rely on objective criteria based on the market situation of today and an informed assessment of the likely market situation of tomorrow. These criteria should allow actual and potential competition for the acquisition of the rights to show sporting events.

We believe it is important for the Ministry to strike a balance between retaining free to air sporting events for the public, using a wide range of broadcast means, while allowing rights holders to negotiate agreements in the best interests of their sports. Any additions to the List could have a significant impact on the long-term funding of such sports and may distort competition in the television/content market.

For the sake of legal certainty, it is crucial that amendments do not have retroactive effect and thus no impact on the exercise of rights - independently of the term - to listed events acquired prior to the date of the amendments' entry into force. New rules should apply to events in respect of which an agreement has been entered into after the commencement of the updated regulation.

Investing in the best and most relevant sports content for our customers has always been a priority for NENT Group. We are committed to offering as broad a range of sports events as possible to Finnish consumers across many platforms.

Responsibility is at the core of NENT Group's business, and we strive to develop and maintain strong relationships with consumers, employees, partners, society and authorities. Therefore, we look forward to engaging in further dialogue with the Ministry and are available for further discussion.

**Kim Mikkelsen**  
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**Nordic Entertainment Group AB**