

Aihe: VL: List of events of major importance for society

AppServerName: vahva.vnv.fi

DocumentID: VN/19971/2020-SAAP-34

DocumentIsArchived: -1

VN/19971/2020

Dear Sir/Madam

Thank you very much for your email with regards to the list of events of major importance for society and your invitation for us to provide our views.

Please see our points below as follows:

1. Overall we feel that the wording is not quite clear when it comes to events that should be broadcast on Free to Air television and on a live basis.
2. We are in agreement that there are games of national importance for Free to Air and live broadcasting. However, there are many games that are not nationally important and we believe that the Decree should aim to keep a balance between Free to Air TV exposure and fair recognition of the market value of a certain property. There is wording to suggest that more games of the Men's IIHF World Championship will be added (i.e. preliminary rounds), but they should then only be principally live. We would like to ask for clarity about the "other games", the meaning of "principally live" and more importantly to distinguish between those that are genuinely of high importance for the market and those that are not (in our opinion preliminary rounds for example should not be classified as games of national importance, subject to maybe national team games).
3. Another element that we do not feel the Decree takes into consideration when insisting on live transmission, are the different time zones of events. The assumption is that all the events at stake are held in a similar time zone as Finland. For events in Asia or overseas, live transmission on linear television may not be necessarily the best option to make the content largely available to the Finnish population.
4. As mentioned in our feedback earlier in the year, the list is representative of the legacy of 'traditional linear broadcasting' and does not, in our view, reflect the digital transformation that has taken place in the interim period. The broadcast landscape has evolved to a market with multiple players supported by new technologies including OTT and online broadcasting capabilities. Additionally, Pay TV and subscription VOD services such as Netflix, have become the accepted standard being widely accessible and adopted. The proliferation of channels/broadcast options also means that the 90% reach obligation for linear broadcast has become outdated and in fact, no longer relevant and we believe it should be 70-80% reach obligation.

Whilst we understand that the availability of certain listed content on freely available television remains a cornerstone of your policy, the criteria should not adversely impact on the commercial viability of sporting events, it should not interfere with the operation of the sports broadcasting rights market, and it should not indirectly reduce the quality of the product offering by limiting bidding for rights and as such resulting in a monopoly position.

Thank you for taking our points into consideration and we remain at your disposal, should you have any more questions.

Yours faithfully,
Amikam Kranz

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