Submission of the Cable and Satellite Broadcasting Association of Asia (CASBAA)
to the Office of the U.S. Trade Representative
February 9, 2007

Identification of Countries under Section 182 of the Trade Act of 1974 (Special 301)

The Cable and Satellite Broadcasting Association of Asia (CASBAA) is a trade association with activities in 15 Asian countries and regions, dedicated to the promotion of multi-channel pay-television via cable, satellite, broadband and wireless video networks. Founded in 1991, CASBAA represents some 120 member companies, which serve more than 3 billion people. US-owned member organizations include AETN International, Bloomberg Television, Boeing Space Systems, CNBC Asia, Discovery Networks Asia, E! Entertainment, ESPN Star Sports, HBO Asia, IBM, Intelsat, J-Com, Lockheed Martin, Morgan Stanley, the Motion Picture Association, Motorola, MTV Networks Asia Pacific, National Geographic Channel, Playboy Entertainment, Paul, Weiss, Rifkind, PricewaterhouseCoopers, Scientific Atlanta, Sony Pictures Television International, STAR Group (NewsCorp), Turner International Asia Pacific, Walt Disney Television International and Worldspace.

CASBAA appreciates this opportunity to provide information to the US Trade Representative's office on practices and policies of countries in the Asia-Pacific that deny adequate and effective protection to the intellectual property of CASBAA's US-based member companies.

1. Countries whose practices deny effective protection to intellectual property in the broadcasting sector, and warrant Priority Watch List status:

Philippines:

Intellectual property violations are widespread in the Philippine cable television industry. Despite a distinct improvement over the last year in the statements by the Philippine government, there has been no change in the situation on the ground – unscrupulous cable operators continue to freely steal broadcast signals (mostly US-owned) and re-sell them to subscribers without making any payments to copyright owners. CASBAA and our research partner Standard Chartered Bank estimated that revenue losses to the legitimate pay-TV industry in 2006 were US$80 million. (The slight decrease from the $82 million reported the previous year was due to ongoing conversion to digital transmission by the principal cable operator in Manila, making theft of services from that network more difficult.) (The methodology used to derive the CASBAA/Standard Chartered "Cost of Pay-TV Piracy" estimates is described in Appendix 1.)

No aggressive regulatory action has been taken against these continued violations. Cable company licenses continue to be renewed by the National Telecommunications Commission (NTC) without regard to whether the company is engaging in signal theft. Moreover, the Philippine Department of Justice has effectively blocked enforcement efforts initiated by CASBAA and its member companies. 12 complaints of criminal copyright violation against one leading pirate firm were filed with the Department of Justice by US-based firms more than a year ago, based on the raids conducted by the Philippine police after CASBAA sought search warrants in September 2005. No action has yet been taken, and the complainant companies have no visibility as to what has become of their complaints. In the meantime, the firm in question (and others raided in 2005) have blithely returned to airing stolen signals.

In an effort to provide an alternative route to resolve intellectual property complaints, the Intellectual Property Office of the Philippines (IPOPhils) and the NTC signed a Memorandum of Agreement to create an administrative enforcement mechanism. Under the MoA, IPOPhils would receive and investigate complaints of intellectual property violations. If the complaints were found valid, the NTC would consider using its regulatory powers against the pirate firm. However, this MoA has still not been implemented. As of the date of this submission, no public hearing has yet been held on Implementing Rules and Regulations, which are necessary before the mechanism can become operational.

CASBAA member companies have been doing business in the Philippines for almost 20 years. They have seen a promising commercial environment drastically deteriorate because of unchecked signal piracy. The Philippine government has been unable or unwilling to take action to change this trend. Strong action is required to achieve adequate and effective protection. The NTC has solid grounds for revoking the pay-TV operator licences which it grants to pirate companies, but it has not done so. Instead, every government action is subject to interminable delay and blockage.

Despite the declared desire of the Philippine government to improve respect for intellectual property rights in broadcasting, the international television broadcasting industry has so far seen no evidence of material change in the acts, policies and practices of the Philippines which have denied adequate and fair protection of the intellectual property rights of CASBAA members. Indeed, one very concrete new practice has arisen in the last year, with the blockage of the criminal complaints filed by broadcasters a year ago.

In the year since USTR announced that the Philippines would be removed from the Priority Watch List, various Philippine officials have promised actions to help remedy the situation in the cable TV industry. No concrete improvement has been forthcoming. CASBAA recommends that USTR institute an out-of-cycle review six months after this year's determination, and if concrete improvement in the cable piracy situation has not been obtained by that time, the Philippines should be returned to the Priority Watch List.

Thailand

The situation with regard to regulation of the pay-TV industry in Thailand might best be described as chaotic. Establishment of a national regulatory body (the National Broadcasting Commission) mandated by law has never gotten off the ground, the government has no functioning apparatus to license cable TV operators, what happens on the ground bears no relation to the legal framework, and enforcement of intellectual property rights is spotty at best.

Hundreds of provincial cable operators have freely pirated US-origin (and other) programming. Many are totally unlicensed and because of a Juridical Council ruling invalidating previous rules there is no valid licensing system in force to discipline the practices of the cable operators. This bleeding of revenues from the legitimate value chain damages both the authorized licensee (TrueVisions, formerly known as UBC) and US content providers. The industry is willing to license other Thai cable operators but with few exceptions, provincial operators have shown no desire to pay for content, and they are under no government pressure to do so.

In this environment, the cost of piracy has burgeoned. CASBAA's industry survey for 2006 estimated that there are about 1.3 million subscribers to pirate cable hook-ups; this dwarfs the roughly 500,000 subscribers that receive licensed programming from TrueVisions. The number of unlicensed subscriptions continues to rise; the cost of this piracy was estimated to reach US$167,000,000 in 2006.

As noted above, the administrative system for regulating the cable industry is in a shambles and the government body theoretically in charge (the Public Relations Department) makes no effort to enforce intellectual property rights in the industry. During the past year, US-based content providers sought some relief through the judicial system against the unrestrained cable piracy. The Motion Picture Association, working with TrueVisions, instigated raids by the Thai police on four pirate cable companies in Phuket (in April) and three in the Bangkok area (in October.) Judicial cases resulting from these raids are now making their way through the prosecutorial and judicial processes.

It is not clear whether meaningful judicial sanctions will result from this process. In the past five years, TrueVisions in conjunction with the public prosecutors prosecuted many pirate operators. However, the Central Intellectual Property and International Trade Court (CIPITC) imposed disappointing sentences on convicted offenders. At the beginning the Court levied sentences of US$1,000-20,000 and several months imprisonment (suspended). In cases during 2005 and 2006, however, the corresponding verdicts were very light, i.e. no fines or imprisonment if the offender does not repeat the same offence within a year. Such lax sentencing rendered enforcement efforts ineffective, and disappointed the rights owners and the legitimate licensee, who had expended considerable resources to bring the cases to conclusion.

Administrative sanctions are also theoretically applicable -- at the conclusion of the judicial processes, the government has the authority to revoke the cable operators' licenses. However, it has yet to do so in the case of 10 other operators convicted of piracy by the intellectual property courts last year in cases filed by TrueVisions.

There seem to be no grounds for any optimism about improvement in the pay-TV piracy situation in Thailand. CASBAA's US-based member companies had hoped for relief in the context of US-Thailand Free Trade talks; that prospect has faded. The Thai government is taking no action to improve regulation of the sector, and on the ground the piracy situation continues to worsen. We urge that Thailand be upgraded to the Priority Watch List, and that resolution of the pay-TV piracy issues be made a priority in bilateral discussions. From the point of view of our industry, given its many years of dilatory handling of this issue, Thailand richly warrants Priority Foreign Country status.

2. Country whose practices deny effective protection to intellectual property in the pay-TV industry, which should be pursued through WTO implementation negotiations:

Vietnam

Vietnam's pay-TV market is growing rapidly. Rising incomes and a hunger for more content – domestic and foreign – are heavily stimulating demand. The number of pay-TV subscriptions has risen 7-fold in the last 2 years, and 36 pay-TV service providers are now operating in 25 provinces.

As Vietnamese citizens begin to enjoy greater access to international programming, piracy of pay-TV signals is rising rapidly. Many of the "legitimate" operators use some pirated programming. However, the industry is gradually becoming more professional and international programmers have had some success in signing legitimate distribution contracts. The most frequent form of signal theft is for an operator to acquire a set-top box giving access to programming from neighboring countries' satellite systems, and to redistribute those signals to many thousands of consumers in violation of Vietnam's international commitments.

As part of its WTO accession, Vietnamese government undertook to implement "appropriate legal instruments mandating that all cable television purveyors provide only fully licensed products to their customers." This commitment has yet to be implemented effectively.

In particular, the implementation of this commitment is highly uncertain as concerns the biggest user of pirated programming. This is the Vietnam Television Technology

Investment and Development Company (VTC), which is owned by the Ministry of Posts and Telematics. VTC, described as an "experimental" venture which began operating in 2003, broadcasts programming via digital terrestrial operations in major urban centers, linked by MPT's government-owned fiber-optic backbone. The vast majority of the international programming broadcast by VTC is pirated.

The rapid growth of the VTC system and its flagrant use of pirated content have rapidly increased the cost of piracy in Vietnam to the legitimate industry. VTC has recently been claiming that its signals are received by up to five million households. CASBAA recently published a more conservative estimate of 1.5 million households, but even at that level VTC is by far the largest single TV pirate in Asia, and as a result Vietnam's market is the most piracy-polluted one in the region! (The fact is that there exists no reliable data on VTC viewership, because the company's sales of set-top boxes have been supplemented by massive smuggled imports of low-cost boxes from factories in southern China – making the Chinese equipment manufacturers the real beneficiaries of this piracy.) Based on its conservative assessment of viewership, CASBAA estimated the cost of piracy to the legitimate industry in 2006 at US$37 million; the true cost is likely to be substantially higher.

Currently, most of VTC's viewers pay nothing for its programming. VTC states that it intends to migrate toward a true pay-TV business model, in which a programming signal will be encrypted and available only to consumers who pay a subscription fee. In the context of that business model, it states that it will use licensed programming. However, movement in that direction has been slow, and the number of unauthorized viewers continues to rise rapidly.

The Vietnamese government is the proprietor of the VTC system, and is well-placed to stop its piracy. Its toleration of egregious signal theft is unacceptable, particularly in light of intellectual property commitments made by the Vietnamese government in the context of the Bilateral Trade Agreement and its WTO accession. We do not recommend any change in Vietnam's Watch List status at this time, but we request that this issue be placed in the forefront of US WTO compliance efforts.

3. Countries whose practices deny fair and equitable access market access to U.S. companies in the pay-TV industry, which should be pursued through bilateral negotiations:

South Korea

Korea has very few problems with signal piracy, although unauthorized distribution of videos and TV programs through the Internet is very common, and undercuts the growth of the pay-TV industry.

The principal difficulty for US and other international entrants to the Korean pay-TV market is the presence of a system of market access barriers designed to protect various parts of the Korean broadcasting industry. This is true despite the rapid rise of Korean content exporters on the international scene. In Asia, Korean content has enjoyed phenomenal success on pay- and free-TV, but the Korean authorities have not been willing to reciprocate with an opening of the Korean market. Liberalization measures undertaken in recent years (including some reductions in restrictions on foreign investment and slight relaxation in the foreign programming quota) have had limited positive effects, but the remaining restrictions still deny fair and equitable market access to international television firms.

The principal Korean regulator, the Korean Broadcasting Commission, makes no attempt to provide a level playing field, does not operate in a transparent manner and issues many of its edicts in private communications on licenses, rather than in transparent regulations or public proceedings. The Korean Broadcasting Act requires that businesses operating "general programming or specialized programming" obtain authorization from the KBC. Through internal policies, the KBC has imposed restrictions on foreign channels as part of the channel authorization process. We understand domestic channels go through the authorization process too, but do not attract these restrictions.

Through this system, the KBC maintains a system of market access restrictions by administrative fiat (rather than legislation), including:

(i) A restriction on the linguistic localization of foreign television program services where policy only permits subtitled versions of foreign pay-TV programs rather than dubbing. (Dubbing is allowed to some joint-venture channels, which are required to have majority Korean ownership, but not to foreign channels. News channels may not establish joint ventures and are not permitted to dub in any case.)
(ii) A restriction on local advertising insertion into foreign pay-TV services.
(iii) Strict limitations on entry of foreign channels into the TV market. Prior approval from the KBC is required and is negotiated on a case-by-case basis in a secretive and burdensome process that takes multiple years to conclude. Furthermore, the KBC has set caps on the number of foreign channels permitted to be carried on any pay-TV platform. These restrictions were theoretically eased (from 10% to 20%) last year. However, the definition of a “foreign” channel was redefined and the actuality has provided little meaningful improvement in the environment.
(iv) The value of foreign channels’ sales is restricted through provisions which in practice limit them to participation in the “basic” tier of programming on Korean cable systems.

In addition, foreign investment limitations remain in the broadcasting industry, including 0% for terrestrial TV platforms and all news channels, and 49% for direct-to-home satellite networks, cable TV networks, signal retransmission businesses and non-news channels.

CASBAA does not advocate any change in Korea’s status on the Watch List. However, we urge US trade negotiators to make relief from these market access restrictions a priority in the ongoing free trade negotiations.

India

Several current and proposed regulatory policies in India deny fair and equitable access to foreign pay-TV companies. The Indian pay-TV market is one of the largest in the world; cable TV systems reach 68 million homes. The market has developed at an extremely rapid pace, on the strength of private investment in infrastructure, as well as content developed by Indian and foreign channel suppliers. Unfortunately, in the past year the Indian authorities have evinced an intention to exert greater statist control of the market, in a manner that threatens market access for foreign companies.

Specific examples of the Indian policies in question include:

-- A restrictive downlinking-permission process that requires foreign companies to establish a commercial presence in India, with potentially large tax consequences, before they can be carried on Indian cable or satellite TV systems.

-- Uneven restraints on foreign investment in Indian pay-TV systems, which vary the allowed percentage of foreign investment from 20% for satellite-based systems to 49% for cable networks and 74% for telecom-network based systems without any economic or political justification.

-- Arbitrary content classification rules that disadvantage foreign suppliers of films and music videos. These rules, crafted in a way to rely on certifications issued for theatrical release, disadvantage foreign television channels which rely more heavily on content not previously released to Indian theatrical circuits. A change in the rules last year resulted in US-owned channels being excluded from certain key pay-TV markets for months, as there was no government system in place to facilitate compliance by foreign channels.

-- Restrictions on foreign news channels, which are not allowed to seek advertising revenue in India. Indian news channels face no such restrictions. In parallel, foreign investment in news channels is under specific constraints.

-- The Indian authorities have also proposed, but not yet implemented, an across-the-board 15% local content requirement for all foreign television channels. If enacted, such a requirement would pose a serious and inequitable market access restraint on foreign companies.

In light of all these market access restrictions, we recommend that India remain on the Priority Watch List, and that the USG negotiate actively to persuade India to adopt regulatory approaches that treat US content suppliers in a more equitable fashion.

<u>4. Trading Partners which maintain specific practices impairing the protection of intellectual property in the pay-TV industry:</u>

Hong Kong

Hong Kong is a thriving regional media hub, home to the regional headquarters of many major television firms. It is therefore surprising to find a growing number of substantial deficiencies in the S.A.R.'s protection of television content, including:

1) Proposals to deny anti-circumvention protection to the broadcasting industry;
2) Insufficient protection against commercial misuse of copyrighted programming obtained from "overspill" broadcasting
3) Toleration of widespread end-user piracy via signal theft, overspill signals and internet viewing.

1) Faulty Legislative Proposal

Hong Kong is quite rightly proposing to enact Copyright Amendments adding to its law provisions to repress circumvention of technical protection measures (TPMs) for copyrighted materials. It has proposed, however, to exempt from the anti-circumvention provisions any TPMs used to prevent copying of broadcast content. As most digital rights management (DRM) systems now entering general use can be set to prevent copying, this legislative proposal would open a very wide loophole in the anti-circumvention provisions. In so doing, it would deny the adequate and effective protection for broadcast copyrighted content that Hong Kong's international commitments oblige it to provide.

The government's stated reason for creating this exemption is to facilitate consumer recording of linear broadcast streams for time-shifting purposes (which is expressly allowed by Hong Kong's current copyright law). Content owners have no quarrel with time-shifting, but argue that creation of a major circumvention loophole is not warranted or desirable, as there is no real problem in the marketplace with obstruction of time-shifting. No other major jurisdiction has implemented a circumvention loophole for time-shifting. Other jurisdictions have addressed the time-shifting concern in a way that does not impair the ability of broadcasters to protect their signals and content.

We are deeply concerned that enactment of such a loophole would allow hackers and piracy syndicates already highly active in Hong Kong and Southern China to freely sell "black boxes" and/or software that would defeat encryption systems used to protect digital content." If Hong Kong can be freely used by piracy syndicates for development and sale of circumvention systems, given its status as a trade hub, it will become a regional center for circumvention.

2) Insufficient protection against commercial misuse of copyrighted programming

Under Hong Kong law, civil suits are available as a remedy for violation of pay-TV companies' copyrights in their programming, no matter how the programming is distributed.

Criminal sanctions are levied for commercial use of programming pirated from Hong Kong pay-TV distributors; however, no sanctions are levied against commercial use – unauthorized by the U.S.-based copyright owners – of programming obtained through overseas distributors. This damages the interests of American (and other) content providers whose copyrighted content receives no protection in Hong Kong if it is distributed via platform operators in neighboring countries. This legal anomaly is coupled with the widespread availability (which the Hong Kong authorities have done little to suppress) of nominally illegal equipment designed to receive unlicensed and/or unremunerated foreign satellite transmissions.

Together, these circumstances have led to widespread exhibition of pirated pay-TV programming for commercial use in public bars, clubs and other entertainment venues. CASBAA has used the civil law to pursue legal actions against some violators, but the high cost of such civil actions, particularly in relation to the damages likely to be awarded by the court, is a strong disincentive against companies' use of civil suits to enforce their rights. CASBAA believes Hong Kong should authorize use of the criminal law to suppress overt commercial misuse of copyrighted signals, whatever their distribution channel.

3) Toleration of end-user piracy

Hong Kong should enact legislation to make end-user piracy (use of hacked decryption systems by individuals to steal programming from legitimate Hong Kong distributors) a criminal offense, as is the case in every other developed Asian market, including Japan, Korea, Singapore and Australia, as well as the U.S. Currently, sales of hacked or set-top boxes or "cloned" smart cards are illegal, but home use is not, resulting in losses to the legitimate pay-TV industry that were estimated at US$31 million in 2006.

Recommendation:

CASBAA recommends that Hong Kong be put on notice that creation of a large "time-shifting" loophole in anti-circumvention provisions is an unacceptable policy choice that will vitiate Hong Kong's WIPO commitment to provide adequate and effective protection. As this loophole currently remains in the government's draft which is moving toward legislative approval, we believe an out-of-cycle review should be scheduled for mid-2007, which should examine the record of changes actually enacted in the Copyright Amendments, and consider trade remedies if adequate and effective protection is in fact denied.

Taiwan

Taiwan was one of the first markets in Asia to enjoy widespread pay-TV service, and it remains potentially one of the most attractive Asia Pacific markets for suppliers of multi-channel television and broadband video content and services. Unfortunately, a rigid and highly politicized regulatory environment has contributed to restricted market access for foreign programming as well as slow development of the digital pay-television industry.

One of the most pernicious and costly aspects of this system for U.S.-based program suppliers is its toleration and support of widespread commercial fraud, in the form of underpayment by cable TV operators to program suppliers for the TV content they distribute. Operators "underdeclare" the number of their customers to Taiwan government authorities, which – fully aware that the numbers are low and are manipulated by a cartel of program distributors – nevertheless accept the numbers without challenge. Program suppliers are then forced to accept the underdeclared number as the basis for payment.

Such commercial fraud is not uncommon in Asia, but the unique role played by the Taiwan authorities in tolerating and abetting this system of fraudulent declarations sets Taiwan apart. Last year, CASBAA's "Cost of Piracy" study estimated that these practices cost program suppliers US$38 million – by far the largest category of piracy prevalent in Taiwan. These losses are directly due to uncompensated distribution of program suppliers' copyrighted works, which the Taiwan authorities are in a position to repress, if they used their legal and administrative powers to reduce the power of the distribution cartel.

There are also other problems in Taiwan which affect the legitimate industry, including barriers to market access to some channels posed by the government's overly rigid control of program line-ups on cable systems, and signal piracy by unauthorized cable operators (including building managers who illegally redistribute pay-TV signals as a "service" to tenants).

CASBAA urges that Taiwan remain on the Watch List, and that the US engage actively with the Taiwan authorities to encourage reform of its regulatory system to reduce the ability of the distribution cartel to deprive copyright owners of the revenue to which they are entitled.

China

China's media market remains highly restrictive for foreign firms. The Internet in China, however, has very much an "anything goes" environment. Intellectual property violations are rife, with numerous commercial operators as well as amateur hackers making pirated television content available via streaming on the Internet. This includes the streaming of entire bouquets of pay-TV channels, which is at the current time the principal concern of CASBAA and its members. CASBAA member companies have found numerous instances of pirate streaming of US-based channels, including HBO, ESPN, Discovery, CNN, the Disney Channel, and Cartoon Network being streamed onto the Internet in China. The Chinese authorities have not yet developed an effective way to deal with this phenomenon.

Another aspect of China's role in the regional pirate economy arises because of China's role as a manufacturing center for pay-TV circumvention devices, better known as "hacked" set-top boxes. These devices, when attached to cable systems or satellite antennas, permit the unauthorized and unremunerated reception of pay-TV programs.

Millions of these boxes installed in China permit Chinese citizens to circumvent media restrictions and watch foreign television. (A CASBAA-commissioned survey of Shanghai equipment dealers estimated there were 500,000 illegal satellite dishes in Shanghai alone.) According to reports received by CASBAA from surrounding countries and territories, circumvention devices numbering in the hundreds of thousands have been exported to, and are damaging legitimate TV suppliers in, among others, Hong Kong, the Philippines, Malaysia, Vietnam, and Indonesia. In those countries, the boxes have the sole purpose of enabling viewers to partially or totally avoid payment of pay-TV fees. The syndicates which sell the boxes and smart cards also provide after-sales service which enables customers to circumvent any change in encryption software by distribution platform operators.

No estimates are available yet of the value of programming thus stolen.

CASBAA recommends that the U.S.G. make internet streaming of television programming a focus of the ongoing US-China dialogue on intellectual property matters.

Appendix 1

Derivation of CASBAA piracy estimates

The CASBAA estimates of the cost of piracy to the legitimate pay-TV industry are derived from a survey of industry players, who are asked to give their confidential estimates (based on audits, subscriber records, market research and other resources available to the companies) of the number of paid and unpaid connections. The survey includes CASBAA member companies who are both broadcasters and platform operators in the various countries.

The survey identified three types of piracy common in the markets covered in this submission. They are described below.

Working with investment bank Standard Chartered Bank (CASBAA's partner in formulating the 2006 piracy estimates), CASBAA used the results of the survey to derive a central estimate of the number of pirate connections. A value was assigned to the revenue lost according to the following breakdown:

a) Unauthorized Cable Access – This represents actions by individuals or groups to tap into the lines of legitimate cable TV companies, without paying subscription fees. Because the legitimate industry receives no income from this source, the lost revenue per pirated connection was valued at levels approximating the published national average revenue per user (ARPU). Note that for several countries this number is probably conservative, as most illegal taps probably occur on large cable systems in major metropolitan areas such as Manila and Bangkok area, where actual revenues are above the national average, and thus the real cost is likely to be higher than the estimate.

b) Unauthorized Operators – This represents actions by rogue cable companies, who take broadcast signals by unauthorized means (hacked set-top boxes or "overspill" boxes from neighboring countries), replicate the signal and sell to hundreds or thousands of consumers. This number includes primarily 100% pirate operators, who do not pay for any of their content. Because the legitimate industry receives negligible income from this source, the lost revenue per pirate connection was valued at close to the national ARPU.

c) Subscriber under-declaration – This represents actions by cable companies who use some legitimate content, but do not pay for all the channels they use, or all the subscribers they serve. CASBAA valued the loss to the legitimate industry conservatively, using its knowledge of conditions in various markets. For the Philippines, for example, the cost of underdeclaration was valued at US$3 per undeclared subscriber, on the basis that some of the content is actually being remunerated, and some is compensated to the content owner through other contractual clauses.

The raw estimates are then adjusted for an assumed “conversion factor” to account for the fact that in the absence of piracy, only a portion of consumers would switch to legitimate program streams. This factor differs for each market based on national income, cable price levels, and extent of distribution networks (home passes by cable systems) enabling conversion to legitimate programs.

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