Digital Copyright Exchange Feasibility Study  
Response from The Copyright Licensing Agency Ltd ("CLA")

Introduction

1. CLA is the relevant UK Reproduction Rights Organisation ("RRO") engaged in issuing licences to authorise the copying of extracts of books, journals, magazines and other periodicals (whether published in print or digital form) by organisations in all sectors of the economy. CLA is owned by the Authors’ Licensing and Collecting Society Ltd and the Publishers Licensing Society Ltd and has an agency agreement with the Design & Artists Collecting Society Ltd. It acts on behalf of the authors, publishers and visual creators in the United Kingdom and as well as representing the interests of overseas copyright owners and creators in these fields. Further details of CLA’s collective licensing activities and the benefits it brings to users and to copyright owners and creators are contained on CLA’s website at [//www.cla.co.uk/](//www.cla.co.uk/)

2. CLA welcomes the launch of this feasibility study into a Digital Copyright Exchange ("DCE") questioning, as it does, the accuracy of some of the assumptions that have led to the proposals contained in the current Government Copyright Consultation, assumptions which CLA believes, in many cases, to be flawed. But this feasibility study is also welcomed for the opportunity it affords to focus on ways in which digital licensing (that is online licensing of permissions relating to publications that may be themselves digital or analogue) might be developed and improved.

3. CLA was grateful for the opportunity to meet the DCE Secretariat to discuss the feasibility study and how CLA’s plans chimed with the DCE proposals. It is happy to answer further questions and/or to provide further evidence where possible, and wants to remain actively engaged in stage 2 of the study.

4. CLA agrees that this submission may be made public.
Overview

1. CLA believes that many of the questions raised in the review conducted by Professor Hargreaves are important to which solutions must be found. CLA agrees that there are certain areas of the “copyright system” which can be improved both through the development of market-led solutions to user demands and by some refinement of the legislative framework – orphan works being a good example.

2. But the central premise, namely that the copyright system is not “fit for purpose in a digital age” is inaccurate, ignoring the reality that for the vast majority of needs the system has stood the test of time. Inevitably there are areas where modification may be required to accommodate the ever-increasing pace of change, but that does not in itself justify the need for wholesale change of the sort proposed in the Government Copyright Consultation, in particular the suggestions for wide-ranging exceptions not linked to any form of compensation or remuneration to the copyright owners for the use of their works.

3. CLA believes that any solution to the problem of providing online permissions should:

- be market-led;
- complement, and not replace, existing structures both in terms of the types of copyright work recognised under UK law and the organisations in which significant investment has been made and who are therefore well placed to develop improved solutions;
- allow for the possibility of cross-sector licensing where this develops organically to answer a clear need supported by a sustainable business model as opposed to an attempt to impose one artificially which is unlikely to succeed and may prove counterproductive;
- both encourage and expect a complementary growth in consumer awareness of the benefits of copyright and the need to pay an appropriate fee for it – like any other consumable;
- not be tied to legislative incentives in some form of copyright register with enhanced enforcement rights leading to a two tier system of copyright.

4. There are many existing initiatives in various industry sectors aimed at addressing the provision of online permissions. Even before publication of the Hargreaves Review, CLA had embarked on a detailed study assessing the potential to develop an online digital clearance system designed to enable copyright owners to offer online usage permissions for their works and to enable users, both business and consumers, to acquire those permissions online.
5. But it will be appreciated that the already complex task of delivering such a major new permissions platform of this type is made more difficult by the uncertainty created by the suggestions in the Government Copyright Consultation for wide-ranging changes to the copyright system. The possible introduction of absolute exceptions, without any form of compensation, presents a significant risk to the health of the UK publishing industry, threatening both primary and secondary licensing and export income; this has created a climate that is not conducive to the delivery of initiatives on this scale.

6. The DCE study however represents an opportunity to enhance the provision of services enabling users to acquire lawfully content and the associated permissions to use that content. CLA would be keen to take a leading part in the delivery of a DCE with the support of its rightsholders.
Question 1 – The Hargreaves Hypothesis: “Copyright licensing, involving rights managers, rights users and end users across the different media types, in the three defined copyright markets, is not fit for purpose for the digital age”

Using this terminology, CLA is a Rights Manager (acting on behalf of rights owners) issuing licences to rights users and end users in at least 2, and probably all 3, of the three defined copyright markets. As will be apparent from the Overview, CLA does not agree with the central premise of the Hargreaves hypothesis that copyright licensing is “not fit for purpose for the digital age”. Little empirical evidence is used to support this hypothesis which instead relies on relatively few anecdotal examples: CLA recognises that there can be improvements and that in particular the potential for individual transactions to be cleared through something like a Digital Copyright Exchange may address some of the developing demand for online rights clearance of published material where not covered by a blanket licence.

Other submissions from the various trade associations and societies representing the many diverse elements of the publishing industry will deal in more detail with the extent to which the publishing industry itself has already made significant progress in providing direct publisher to user permissions in response to growing demand. But it should be noted that over the last decade this demand has mainly been at an organisational level and that the requirements for individual consumers to acquire content in this way – in the publishing industry - is comparatively recent compared to the experience of the music industry. The development of electronic readers and the growing availability of electronic publications means that the publishing industry is now facing the problems that the music industry has faced for some while; but it is already developing both individual and collective licensing solutions to answer these needs. Given that this requirement is relatively recent, it cannot be correct to assert that the system has already failed and is “not fit for purpose”.

The collective licensing arm of the publishing industry is represented by CLA along with the Newspaper Licensing Agency Ltd (“NLA”) for newspapers. CLA licences have for a long time provided efficient, inexpensive and easy to acquire licensing permissions to all sectors of the economy enabling them to make copies and use extracts from a vast range of titles without the need to seek an individual clearance in advance. These licences have successfully developed over the last decade to include, in addition to the original photocopying permissions, the right to make digital copies of printed material by scanning and then, later, the right to reuse portions of electronic publications for uses not covered by the initial primary licence.

The latest addition has been the inclusion in many licences of website material alongside which CLA has launched a scheme (“What Can I Do With This Content?”) to provide a set of easily recognisable industry standard icons for use on websites to identify what permissions are attached to a particular
digital product and which tells users at a glance what they can do with that product and/or whether they would need a further licence and/or a CLA licence for a particular usage. Further details of this initiative are set out in Appendix 1.

In short, the collective copyright licensing facility offered by CLA has developed to keep pace with the changing market and continues to offer innovative solutions to new requirements. Furthermore, CLA is contemplating a significant development of an online digital clearance system permission that would appear to resemble closely the Digital Copyright Exchange to cater for the potential growth in user demand for individual clearance. It cannot therefore be said that copyright licensing as undertaken by CLA is “not fit for purpose in the digital age”.

The 7 reasons given for the Hargreaves hypothesis

These assert that copyright licensing is:-

1. “expensive”:

   CLA welcomes the recognition that the cost of the licensing process and the cost of rights are distinct items, something too often blurred by the consumer. For instance, purchasers of copies of articles supplied by document supply institutions such as the British Library sometimes do not understand the need for a copyright fee to be paid in addition to the administrative charge raised by the supplier of the document.

   Dealing with these 2 separate aspects in turn:-

   i) the licensing process: this is not unduly expensive. As part of its response to the original Hargreaves Review, CLA (along with ALCS, PLS and DACS) commissioned PricewaterhouseCoopers LLP to write a report (the “PwC Report”) entitled “An economic analysis of copyright, secondary copyright and collective licensing” which can be accessed from CLA’s website at:

   ://www.cla.co.uk/data/corporate_material/submissions/2011_pwc_final_report.pdf. This compared the costs in the university sector of acquiring and administering the CLA licence (as distinct from the fees charged for that licence which equates to the cost of rights) in what was termed the collective model against the costs that would exist in the absence of a CLA licence – which was termed the “atomised” model. This showed that the costs of the current collective system of £6.7m compared most favourably to the costs of the atomised model of between £145m and £720m (depending on which assumption is chosen as to the number of transactions that would occur under the atomised model) with £360m as a mid-range estimate.
This sum of £6.7m should also be set against the overall budget in 2009/10 for the higher education sector of £26.8bn (source: Higher Education Funding Council for England), a tiny fraction of the running costs of Universities.

CLA does not charge licensees an administration fee for the grant of a licence, nor does it charge rightsholders a subscription fee to participate in its schemes, but instead deducts an administration charge on account of 11% (on average) from its licensing income. Looking overseas, licensing systems which involve levy schemes and/or statutory licences are inevitably cheaper to administer (as there is little or no cost of sales), but CLA’s expenses compare favourably with RROs abroad, some details of which are given in Appendix 2.

ii) the cost of rights: it should be noted as a general point that CLA’s licence fees are subject, in common with those of other licensing bodies, to the jurisdiction of the Copyright Tribunal, a statutory body charged with the task of ensuring that the terms, including the fees, of collective licences are reasonable. Whilst it is entirely natural for licensees to argue that they should pay less for a given licence, they have statutory protection against unreasonable charges with their ability to refer a licensing scheme to the Copyright Tribunal for review. There is no evidence in the Hargreaves report to justify any argument that CLA licence fees are too expensive and it should be noted that CLA has only once in its history been referred to the Copyright Tribunal. On that occasion the rates it charged, which the Claimants had wished to reduce sixfold, were broadly maintained.

CLA currently charges higher education institutions on a per full time student (“FTE”) basis, the rates for the comprehensive digital licence in 2011/12 being £7.13 per FTE which is a modest sum when set against the typical tuition fee charge of £9,000 per annum. CLA’s licensing income from higher education institutions overall for the same year was £13m, which again represents a tiny fraction of the total £26.8bn budget in 2009/10 of the HE sector. The same can be said of all other CLA sectors (for instance schools, where a state secondary pupil in England is charged at only £1.69 per annum (2011/12); CLA’s annual revenue from the state-maintained secondary schools in England is £8.7m compared to the annual budget for 2011/12 from the Dedicated Schools Grant which we understand from the DfE to be £36.6bn.

These facts simply do not support an assertion that copyright licensing is expensive.
2. “difficult to use”:

Once granted, a licence allows all members of the licensee’s organisation to make copies within licence limits without the need for any further referral or permission. CLA operates what is known as an opt-out scheme whereby all books, journals, magazines and other periodicals published in the UK and any published in the listed territories where CLA has a Repertoire Exchange Agreement are included in the licence, subject to a relatively small list of exclusions. This indemnity-backed collective licensing approach provides licensees with convenience and certainty and shifts the risk of copyright infringement from the user to CLA. CLA has developed a ‘beta’ look up tool to be launched this summer which will allow users an easy, online, ‘at a glance’ guide as to titles included or excluded in cases of doubt.

The continuing reporting obligations in the licence required to provide the necessary distribution information are relatively light involving periodic sampling exercises, where the load is spread amongst licensees so that it is an infrequent event for any given licensee. CLA is investigating an online reporting model to reduce further the administrative resource needed.

Although CLA licences are necessarily legal documents, they are always accompanied by user guidelines explaining in clear terms what can and cannot be done under the licence aimed at the individual user and often written in agreement with the representative body of the licence sector concerned.

3. “difficult to access”:

Again no evidence is offered to support this assertion. The existence of CLA licences is well known amongst the sectors that require it and taking out a licence is a simple administrative process requiring the submission generally of a simple one or two page application form - and this only on the first occasion of licensing (as the licences generally renew automatically each year unless a licensee chooses to terminate). CLA has also invested significantly over the last 18 months in the development of a fully automated e-licensing system offering online renewals which will be rolled out this year, initially to the business sector.

4. “insufficiently transparent”:

It is unclear whether this remark is directed at:

- copyright owners, suggesting that they find collective licensing lacking in transparency (a complaint often heard in continental Europe):
CLA, unlike most RROs in Europe, is subject to Companies Act legislation but, like most UK collective licensing organisations, is owned and controlled by the rightsholders themselves; or

- *users*, suggesting they find the role of, or the terms and conditions offered by, collecting licensing bodies difficult to comprehend:

  CLA’s role as a private limited company acting on behalf of the authors, artists and publishers in the United Kingdom is clearly stated on its website and in its licence documentation. Its licence terms and rates are also clearly stated on its website. CLA has worked with others on the British Copyright Council template for a Code of Conduct for collecting societies and will be constructing its own code which, it can safely be assumed, will be in operation well before any implementation of legislative proposals pursuant to the Hargreaves Review of recommendations in this area.

5. **“silied within individual media types”**

This is an easy charge to lay, which must necessarily contain some truth in it, but that is no more than to say that modern life is inherently complex. The different copyrights that protect the many elements of creativity that go into the production of a copyright work (such as a TV programme, a video game, a book or a record) should not be seen as constituting awkward undergrowth that needs to be cleared away, but as evidence of successful product development (which is perhaps taken for granted by the consumer).

CLA licences already bring together the different skills and efforts of various links within the creative chain (authors, artists and publishers) covering the very diverse sectors that make up the publishing industry as a whole. CLA has also recently jointly launched with the NLA a pilot programme for joint selling of both CLA and NLA licences – see press release: 


CLA is also a leader in a body known as the Rights Industry Forum - a collection of organisations involved in copyright licensing to schools which provide comprehensible guidance on the copyright aspects of educational activities.

CLA is trying to expand the repertoire of types of works that can be included in its licence, and is, for instance, actively engaging with the music industry aiming to include sheet music within its licences. CLA would hope that any digital permissions clearance service it developed could accommodate various types of copyright works.
6. “victim to misalignment of incentives between rightsowners, rights managers and rights user/end users”

It is unfortunate that the pace of development of computers and the Internet resulted in an initial lack of clarity in business models as to how to engage with the Internet. Content was made publically available on the Internet, often without any form of subscription or other form of payment requirement and, in practice, became freely accessible whether on a lawful or an unlawful basis. This has produced a culture that expects content to be free (often confusing the very different concepts of “freely available” and “available without charge”) that is only slowly susceptible to change. But the music industry is a good example where the seemingly intractable file-sharing problem is gradually being challenged by legal download channels.

The true “misalignment” here really lies in the area of deliberate and/or systematic infringement (in other words piracy) and the practical and legal difficulties – and costs – of prevention. The Digital Copyright Act was a valuable first step in tackling this, but which has failed even within its own terms to develop a system that would reduce file-sharing by the order of magnitude envisaged when the Bill was passed. There is definitely a role for Government to assist by producing an appropriate enforcement regime offering rightsholders a cost effective and simple way of enforcing their rights in accordance with the EU Enforcement Directive (Directive 2004/48/EC of the European Parliament on the Enforcement of Intellectual Property Rights) requiring Member States to “provide measures, procedures and remedies” for the enforcement of IP rights that are not “unnecessarily complicated or costly” and which do not “entail unwarranted delays” and which are “effective, proportionate and dissuasive”.

From the CLA perspective, this would include further reform of the Copyright Tribunal (in line with the recommendations from a series of consultations) and the introduction of a representative action for “intellectual property collective-rights management bodies” in accordance with Article 4 of the EU Enforcement Directive given that the cost, complexity and uncertainty of enforcement are often beyond the means of even medium-sized enterprises, let alone individuals.

7 “insufficient international in focus and scope”

This charge is also an easy one to make. But most businesses with any overseas activity have to comply with a range of overseas laws in such diverse areas as employment, health and safety, consumer law, financial and healthcare regulatory requirements, advertising regimes and many others. A car, a drug or a television programme made in the UK and exported overseas will be subject to a host of domestic legal requirements in the countries to which it is exported – and copyright is no different.
CLA has signed 32 Repertoire Exchange Agreements with RROs in other countries in the world thus enabling it to offer a huge international repertoire to its domestic licensees. Facing the other way, it licenses document supply organisations in the UK to supply copy documents overseas and last year launched a multinational licence whereby a UK-headquartered multinational company could take a licence covering its subsidiaries throughout the world. CLA has led a taskforce of RROs within Europe to progress the possibilities of pan-European licences and is open to discussion with educational institutions should they require copyright permissions for overseas campuses and overseas distance learning.

CLA is a net exporter in terms of the payments it makes to and receives from RROs overseas with net revenues of £11.5m in international income in 2010/11 from its existing Repertoire Exchange Agreements. CLA is mentoring the development of an RRO in India where the export opportunities for English language publications are vast, with over 300 million students in education. CLA expects to conclude a Repertoire Exchange Agreement with the Indian RRO in the near future. China is another huge potential territory, currently the 16th largest export market for UK books, where sales have risen from £15m in 2008 to £33m in 2010, an increase of 120% in just 2 years.

**The 7 claims made to support the premise that copyright licensing is “not fit for purpose”**

1 & 2 The size/share of the pie for rightsowners is smaller than it could be

In collective licensing terms, the issues to be considered would be the extent to which the rates collective licensing bodies can charge are fair, given the difficulty of licensing and, in particular, the problems of enforcement and the lack of representative action and the fact that rates freely negotiated are then subject to the possibility of further review by the Copyright Tribunal. However, whilst an efficient and cost effective enforcement regime could help copyright owners to obtain a fairer share of the pie from the activities of their collective licensing bodies, it is recognised that there needs to be a corresponding development of legitimate download channels of the sort envisaged by the Digital Copyright Exchange – and which CLA is studying in detail.

3 & 4 Digital businesses within the creative industries are being restrained and innovation checked

Again the Hargreaves Review cites little beyond anecdotal evidence that this is the case and it may be that the problem is often over stated. Rightsholders and their collective management bodies are always willing to develop tailored solutions to genuine needs, but this requires dialogue and a clear exposition of what the problem is. What is clear though is that it must be
wrong to contemplate, as the Government’s Copyright Consultation does, significant changes to the legislative framework, introducing widespread exceptions, as a supposed answer to a problem that has not been clearly articulated. The outcome is likely to be the reverse of that intended: wider exceptions allowing free riding by businesses on the copyright content produced by others is not likely to encourage innovation and the growth of new digital business, but rather the opposite.

5. Infringement of copyright content remains persistent

This is, and always has been, true to an extent, although the scale of the problem has mushroomed with the growth of digital technology and the potential for peer-to-peer file sharing. As stated above, a twin-track approach needs to be adopted involving the institution of an effective enforcement regime to deter the worst excesses and the continued development of licensing options to enable legitimate users to access and download their content lawfully and easily.

6. End users are deprived of access to a significant amount of commercial and culturally valuable content, e.g. archive material

From a collective licensing perspective, this claim is, by definition, completely answered by the existence of a blanket licensing scheme, at least for the works covered by the scheme. We have discussed above the possibility of CLA licences including additional repertoires and note also, in this respect, the Government’s proposals for extended collective licensing schemes.

The major problem to be considered in this area is, however, the problem of orphan works, which is also the subject of recommendations in the Government’s Copyright Consultation. It should be noted that CLA is, along with ALCS, PLS and the British Library, a UK partner in the ARROW programme designed to produce a database of works to allow a due diligence search to be carried out by users wishing to seek copyright licences (see details at [www.arrow-net.eu/](http://www.arrow-net.eu/)). Several years ago CLA offered to launch a licensing scheme to deal with the problem and awaits the necessary legislative changes to allow it to pursue this initiative.

7. UK GDP would grow by an extra £2 billion per year if barriers in the digital copyright market were reduced

Other organisations have noted that this figure seemingly derives from the Copenhagen Economic study “Economic Impact of Digital Single Market” ([www.epc.eu/dsm/2/Study_by_Copenhagen.pdf](http://www.epc.eu/dsm/2/Study_by_Copenhagen.pdf)) where copyright was listed as one issue (but only one of many) possibly hindering growth of the single digital market. Other submissions have dissected the shortcomings of this approach (see the submission from the
Publishers Association which CLA has had the benefit of reading). No other evidence is offered for the rather startling view that increasing exceptions to copyright (albeit in some cases in minor or peripheral areas, but in other cases in areas of significant current licensing activity) could have a net positive impact on UK GDP, let alone one of such an order of magnitude. Indeed common sense would seem to suggest that the opposite is true and CLA will be including in its submission to the Government Copyright Consultation regarding the proposals for educational exceptions an appendix to the PwC Report to analyse the adverse impact that implementing these exceptions could have on the UK economy by discouraging investment, damaging exports and threatening employment prospects.
Question 2

Do you agree with these definitions, including the market definition? If not, why not? Please suggest better ones.

The description of copyright licensing seems broadly accurate, although clearly written from the perspective of a user wishing to acquire rights rather than from a perspective of the rightsowner or its representative body in setting up systems to deliver permissions for those rights. CLA would draw the attention of the DCE Secretariat to Table 9 of the PwC Report which identifies the elements in the transaction chain for higher education institutions licensing with collective management organisations and contrasts these with the steps involved in an atomised system.

It may not be important for the purposes of the current study, but it should be recognised that any form of collective licensing involves individual rightsholders and groups that may be natural competitors engaging in difficult, time-consuming and, at times, delicate negotiations to create a joint venture licensing structure and agreeing on mechanisms to determine an appropriate and fair distribution of revenues.

Mandate acquisition for overseas works is a further difficulty that has to be undertaken. Furthermore, and perhaps more pertinent to this study, the description ignores the effort required of a collective licensing body leading up to the point of a licence: although users sometimes seek licences of their own accord, in the vast majority of cases they have to be contacted repeatedly and persuaded of the benefits, and in most cases the legal necessity, to take a licence.

It might be appropriate therefore to draw up a parallel list of distinct processes involved in copyright licensing, viewed from the perspective of the rightsholder to set alongside the list proposed in the study document.

We would also note that “rights users” and “end users” are not necessarily different entities or individuals, and in fact this might be a somewhat confusing description. A viewer of a TV programme is an end user in common parlance, but is not, at that stage, part of a copyright licensing process as such. A “rights user”, such as a school or a business that acquires a CLA licence is, as a legal entity, also an “end user” that is most clearly is involved in the licensing process.

The description of the 3 copyright markets represents a reasonable approach and the list of 9 media types provides what may be a useful working list, but as with the other descriptions, the question is to what purpose these descriptions are to be put. Most issues relating to copyright licensing resolve to an understanding of the legal framework in which copyright exists requiring there, firstly, to be a work that falls within the description of a work protected by copyright within the 1988 Act and then,
secondly, for there to be a proposed use of that copyright work that falls within one of the defined “Restricted Acts” in the Act, without it, thirdly, falling into one of the defined “Permitted Acts”. It is not clear how these 9 media types map on to the definitions and descriptions in the Copyright Act, but it should be observed that CLA licences generally involve items 3, 4 and 5, that is, text (primarily) but including embedded artistic works that may fall within the description of 4 (artworks) and 5 (still pictures). To that extent of course item 8 (mixed media) is also relevant.

In Conclusion

CLA believes that the copyright licensing system is broadly fit for purpose, but which can be further improved through measures to strengthen the enforcement regime thereby encouraging investment in the creation of copyright works and in online permission systems of the type envisaged by the Digital Copyright Exchange.

Collective blanket licensing of the sort offered by CLA still offers a flexible solution to many of the user needs of today; a DCE for the publishing industry (which could perhaps offer cross-media permissions where justified by the market and supported by copyright owners) could address the user requirements of tomorrow.
APPENDIX 1

Online publishers and copyright owners are sometimes concerned about how their content is used; while online content users are often unsure about what they are permitted to do with content, without infringing copyright.

“What Can I Do With This Content?” is an initiative designed to address this issue. It comprises a new copyright icon and set of standard copyright messages (see example at the end of this Appendix) created by CLA to help online content publishers display their key terms of use online. In addition, the initiative will inform users what they can do legally with the content and help educate them that not all “free-to-view” content is “free-to-copy”.

The icon provides a clear and simple display to communicate terms of use and can also be used to inform end users that the publisher and its content is included in the UK collective licensing scheme for text and still images. However, it is not necessary to opt-in to the scheme to use the icon.

“What Can I Do With This Content?” is intended for use by any online content publisher – whether they have one webpage or many sites and titles. The icon works equally well when applied to an academic website or an online business magazine. The display itself can be configured to display copyright terms relevant to an individual article, page or across the whole site and can be personalized with the publishers logo and contact details if desired.

It is completely free-to-use and can be downloaded and installed directly from the website whatcanidowiththiscontent.com. The installation process is quick and easy; upon visiting the site, content publishers will be asked to select from a menu the copyright terms that suit them. If they are signed up to the CLA licensing scheme then there are prescribed terms that they must choose which are consistent with the permissions granted to holders of the CLA licence. If not, then any terms can be used as the copyright owner determines and they can write their own. Once the terms are selected the site will generate an HTML code that is used to add the icon and terms to your site.
Using “What Can I Do With This Content?” increases the visibility of the publishers’ copyright policy and heightens general awareness of copyright online, educating users and directing them where they can buy a licence or how to obtain other permissions from the publisher or other relevant copyright owners. “What Can I Do With This Content?” is supported by the main author & publisher trade associations and membership bodies.

It is hoped that the icon and the copyright messages might become an industry standard that is recognised by internet users and copyright owners alike.

Yes, you can print multiple copies if you have a Copyright Licensing Agency (CLA) Licence.

A CLA Licence allows printing of multiple copies of one article or story, or a similar proportion of the whole website, for viewing by you or by your colleagues internally within your organisation in unaltered form.

Unless you have our permission on each occasion, or a licence from the CLA or other authorised licensing body, you may print out only one direct paper copy of any of the contents of this website for viewing by you or by your colleagues internally within your organisation in unaltered form.

To apply for a licence contact The Copyright Licensing Agency
Tel: 020 7400 3100 Email: licence@cla.co.uk Web: www.cla.co.uk

Contact the publisher direct.
## APPENDIX 2

<table>
<thead>
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<th>Organization</th>
<th>Expenses as % of Total Revenue</th>
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Note: Revenue figures are taken from 2009 IFRRO Status Report.