



3 March 2008

Ms Helen Daniels
Assistant Secretary
Copyright Law Branch
Attorney-General's Department
Robert Garran Offices
National Circuit Barton ACT 2600

Dear Ms Daniels,

Re: Submission by Village Roadshow Ltd to the Attorney-General Department's review of Sections 47J and 110AA of the *Copyright Act 1968*

Based in Melbourne, Australia, Village Roadshow Limited (Village Roadshow) is a leading international entertainment and media company with core businesses in Film Production, Film Distribution, Cinema, Theme Parks, and Radio.

Roadshow Films, Village Roadshow's Australian distribution business, is a member of the Australian Visual Software Distributors Association (AVSDA).

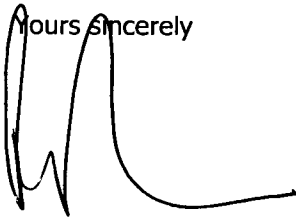
The Village Roadshow group has a wealth of history and expertise in the production, marketing and distribution of Australian films. The group, and in particular Roadshow Films, has been a leader in the Australian production and distribution business since the 1970s, when it was involved in such iconic Australian films as *Alvin Purple*, *Petersen*, *Mad Max*, *Breaker Morant*, and later projects such as *Priscilla Queen of the Desert* and *Muriel's Wedding*. The group has a strong ongoing commitment to the Australian film industry in addition to our historical track record, as demonstrated by major Australian titles recently released (*Jindabyne*, *Wolf Creek, 2:37*, *Boytown*, *December Boys* and *Rogue*).

Village Roadshow fully supports the AVSDA submission to the format shifting review for the following reasons:

- We believe that there are no consumer or industry benefits to the proposed amendments to Section 110AA of the Copyright Act.
- The proposed format shifting exceptions would undermine business confidence and emerging on line distribution models.
- We, as well as other investors in film and television content, make investment decisions based on the total anticipated return on an investment. Any reductions in the vital DVD side of the total return would reduce our capacity and ability to invest at current levels.
- These concerns have been magnified in recent years, as the increasing production budgets applicable to Australian television drama require even greater ancillary revenues in order to drive an acceptable business case.

- As you are aware, we have for these reasons been actively engaged in the industry's efforts against copyright piracy. For the same reason, any amendments to this section which allow private or other copying of films or television programs (with or without TPM provisions) would also likely negatively affect our investment decisions.

Accordingly, Village Roadshow strongly recommend against any changes permitting the format shifting of DVDs.

Yours sincerely


Peter Davey
Managing Director
Corporate and International Development