



Entire Consultancy Ltd

Public Consultation on Content Online in the Single Market

*Produced by Entire Consultancy Ltd
2 Gayton Road
Harrow HA1 2XU
Tel: 0208 901 7592
Fax: 0208 901 4001*

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Introduction

Entire Consultancy Ltd has proven experience in creating web-based solutions to support both small and large organisations. Our work involves the development of different platforms including Website designs, Intranets/Extranets, Community communications platforms, Online collaboration tools, Database systems and New Media.

With the growth of broadband, our clients have only begun to realise the potential in video/media streaming which will allow a broader reach to their markets. Our Media strength lies in helping our clients understand how the new technology works and how it can be delivered.

“Our emphasis for any project is to create systems that are ‘well designed’, have ‘great functionality’, but can be easily managed and is easy to use. Our mission is stated in the theme of solutions we provide for our clients; creating and deploying ‘SIMPLYCLICK’ technologies.”

Questions

Types of creative content and services online

1. Yes, Entire Ltd does offer creative services online. We do this by providing our clients with the tools and technology to prepare and deliver their content online (ie. desktop editors, encoders, web streaming, data management, hosting).
2. As one of our primary markets is the UK Education sector, I would propose that Education/Learning content should be provided in future plans as well. If you begin at the school level and establishing early familiarity with the technology, it would be more likely to be adapted in future programmes.

Consumption, creation and diversity of online content

3. We do believe that the present environment is becoming more conducive to developing trust and take-up. Given the popularity of social sites such as YouTube and MySpace, the mechanism is in place for easier adaptation of new content. The biggest concerns for faster uptake would be technical understanding, speed of networks (reliability), system compatibility and interoperability of devices.
4. Yes, I believe there is adequate protection of public interests for the online environment. Here in the UK, User rights are as best protected by Data Protection Acts and to the integrity of the businesses handling the data.
5. It is important to be able to access online content on as many devices as possible. However, different devices enable different experiences in terms of how content is viewed and operability is always an issue. It is important for any device is that the function works and delivers content that is optimised for that device. Interoperability standards need to be strengthened to help the end user experience.
6. Cultural diversity can be self-sustaining online but more needs to be done to promote and foster it. The web has tremendous potential in offering more choices and more options in enabling the culturally diverse users.

To help people share and circulate more their creative work, there needs to be better opportunities to do so. There's very few places except the key community portals that allow this. By enabling additional online communities, perhaps, within a local region/town online system, more users could contribute.

Competitiveness of European online content industry

7. Europeans are beginning to catch up in terms of accepting and utilising more online content versus the main market from the USA. The USA consumer market because of the wide variety of programming available, has resulted in a natural transition to the web. European media however, tend to be more traditional in approach and less

commercial making transition of embracing content on the web less appealing. Also, broadband uptake differences in Europe also can account for this gap.

New business models and transition of traditional ones into the digital world

8. The opportunities for new online content creation and distribution lie in all the areas mentioned but I believe the key areas lie in streaming and Internet TV. This is a perfect medium for tailoring programmes to fit the end user's needs without the tremendous costs of traditional TV broadcasts. In addition, it's about the time the consumer has to be able to view their programmes. With the Internet, the user can watch their programme/s as and when they want it versus what the TV schedule permits.

Yes, Entire Ltd intends to offer these types of services not only in the UK but in Europe as well. We will provide for clients that wish to create their own channels the tools and technology to do so.

9. This is a tough one as it is difficult to guess at the market uptake of digital content. It will depend on costs for broadband decreasing as well as the provision of the right content material to be delivered.
10. Yes, there are many technological barriers to having a more efficient online content creation and distribution. First, it's the technology itself...do you use Windows, Real, QT, Flash, MPEG and or other formats? Then what infrastructure do you use and how do you get content to work online? And finally, it's also understanding what the technology can do and how best to execute it that is the ultimate challenge. Hopefully, our approach to working with our clients in terms of understanding not only the terminology but also the technology that will help to produce a more efficient online solution.
11. The biggest challenge in securing revenue streams is determining what to charge clients for the new Media services. With the many variables associated with the uptake of Media, clients may not yet know the value of what they are buying as the field is relatively new.

Payment and price systems

12. For our activity in terms of providing products and services, we work on a licensing deal where the client will pay for an initial licensing fee followed by monthly payments for hosting and support services. The payment mechanism can be through online credit card/debit, electronic bank debit, or standard cheques.
13. This method is typical in our field where we are providing the tool to create the content but also the services in support of delivering the content.

Licensing, rights clearance, right holders remuneration

14. Yes, a Europe-wide or multi-territory licensing and clearance would be a big benefit for businesses. This would be extremely valuable because it enables a broader and stronger legal reach for the content not just within their own country. It also would simplify how licensing is supported across different Governments. The greatest challenges lie in cooperation from the participants involved in agreeing to a Europe-wide ruling.
15. The biggest problem facing the licensing issues here in the UK is understanding what the regulations are in terms of the vendor's rights and how they can be protected. It would help if the rules were communicated more widely and easily as to how best protect the IP of the information.
16. Very much like the Music industry, remuneration has to be done on an honour value system along with documentation as to when content is purchased or used. A Europe-wide set of rules would be helpful to make sure that all countries abide by similar principles which can then trickle down to the local agencies. If the perspective participants agree to place harsh measures on unauthorised copies, this would go a long way in building the trust and confidence of the industry.

Legal or regulatory barriers

17. I think there is a general fear and lack of understanding as to how best to protect content/IP. One typically doesn't know about standard copyright and are fearful that it will be very expensive to protect those interest. And what happens when there is unauthorised access or copy to their material? Who do they contact and what do they do next? These are the important issues that need to be addressed.
18. Here in the UK, given the massive push in broadband, it is the consumer demand in new Media that is driving the development of the new content.

Release Windows

19. Yes, 'Release windows' are important to our business. We typically look to release initial versions of our tools to get consumer feedback on whether the product fulfills the market need. Based on feedback, we make our adjustments followed by additional releases. Given that we do provide many online tools, additional releases are more simplified and can be pushed out to the consumer at the click of a button. This saves time and money in product development.

Networks

20. I believe that competition breeds innovation. In enabling a non 'network neutrality' environment, products and services will need to improve to compete. It is the way of business.

Piracy and unauthorised uploading and downloading of copyright protected works

21. Our business model is not affected by piracy as we are not a content provider but a supplier of tools and services to produce the content. Overall, however, this is a concern for all that is working in this field. Actions such as DRM, datatracking, and working with partners and the community in reporting piracy are examples of what can be done to at least minimise piracy. Yes, unauthorised uploading and downloading is equally damaging regardless of size of the pirates.
22. I think that education has a lot to do with improving people's understanding of piracy issues as an effort to help minimise its effects. I believe to continue to broadcast to the end user that piracy is prohibited with a threat of fines would push this message across.
23. Yes, peer-to-peer technology could be used so that owners are protected. I think it just depends on the materials in question. Initially in this field there were major concerns but look at how Napster has adapted their model in terms of promoting legal downloads.

Rating or classification

24. Although it doesn't directly affect our business, classification can be a challenge depending on the classification criterion between countries. What's ok in the UK could be prohibited in France for example. This is where establishing general rules and guidelines will be extremely important in greater material being distributed.

DRMs

25. Yes, we will use DRMs as we feel it is an important means to manage and distribute products for our clients.
26. Yes, we have access to robust DRMs which would protect our client's content adequately.
27. Yes, DRM is more and more widely used in the industry here in the UK. Consumers may not know as much about what DRM is but certainly, content providers do.
28. Yes, we do use copy protection measures. It is becoming a requirement from clients who have concerns for how fast the technology is developing in terms of piracy.

29. Once again, greater participation and cooperation among the EU countries would be a great benefit in the promotion of DRM standards and principles (ie. interoperability)

Complementing commercial offers with non-commercial services

30. I think this has great importance in terms of working with non-commercial services because it gives the consumer greater choice. Greater choice will only open up the market even more.

What role for equipment and software manufacturers?

31. By working on creating standards across Europe, it would be much easier for equipment and software manufacturers to sell their products because the technology could be supported.

What role for public authorities?

32. The biggest role for national governments is working to establish a general set of rules and guidelines that is agreed for all participants. By doing this, vendors, manufacturers and service suppliers can better sell to their market both within country but among countries.
33. Overall, the EU needs to establish agreements and guidelines which will be supported at all levels. This would be the biggest benefit in support of growth for this field. Imagine how fast this field will evolve for all stakeholders if there is one agreed charter vs 26+ charters.

Thank you for allowing me an opportunity to participate in this debate. I look forward to seeing how my comments and suggestions have been taken into account in addressing this exciting new market both here in the UK but also in Europe.

My contact details:

Don T. Ras
Managing Director

Entire Consultancy Ltd
2 Gayton Road
Harrow
Middlesex, England
HA1 2XU
Tel: +44 0208 901 7592
Fax: +44 0208 901 4001
Mob: +44 07973 240 743
Email: dras@entireltd.com
Web: www.entireltd.com