

# Content Online consultation: response from the UK Government

## Introduction

1. The UK welcomes this look at the issues affecting content online, which aims to build on what has been achieved within Film Online. We recognise that the consultation is primarily aimed at industry players, and we have encouraged as many within the UK as possible to respond. However, the Commission may also find it useful to have a response from government, particularly as we have brought together a wide spectrum of industry interests to discuss the initiative, as well as considering this from a public access perspective. In our view, it is also important explicitly to recognise the related work that is going on elsewhere, sometimes in different parts of the Commission itself and to ensure that all these different initiatives are consistent in their effect where they touch on the same areas.

2. We have consulted both with industry and with cultural institutions and below we summarise their views on the overall issues addressed, together with a UK Government perspective. We also have comments on some of the specific questions raised.

## Industry views

3. No doubt the consultation has elicited a broad response from all parts of industry. In order to inform the UK government response we worked with the Broadband Stakeholder Group (BSG) to bring together a broad spectrum of industry interests in this space to discuss the initiative and see where there was a common view. This included representatives from sectors such as telecommunications, mobile operators, Internet service providers, electronics, technology providers, music and publishing.

4. The BSG has submitted a response to the consultation which summarises the discussion that took place, and that response is attached for ease of reference at Annex "A". Interestingly, there was a broad level of agreement between the diverse interests present which coalesced around three key conclusions:

- **Allow the market time to develop its own solutions**

Digital content markets are evolving and unpredictable, with new content, formats, distribution platforms and business models emerging and disrupting the status quo on an almost daily basis. As such, massive paradigm shifts in market dynamics are taking place, with structures, partnerships and interdependencies in flux. It is as yet unclear which approaches will be successful, and which new entities might yet emerge as key market players.

- **Policy, review and initiative overlap – the need for better regulation**

As the breadth of the consultation document demonstrates, the issues pertaining to the online content market are inter-related and wide-ranging, and so it is essential to consider EU policy implications in the round. However, we are aware that many of the questions raised in the Content Online document are already being addressed or reviewed elsewhere, both at EU and member state level.

- **National vs Single Market solutions**

The consultation document seeks to establish where the EU can take added-value actions in this area, but we would like to question the assumption that challenges facing the online content industry ‘can be best addressed at European level’ and believe instead that the principle of subsidiarity be applied.

5. The UK Government would endorse each of those conclusions. There is no clear-cut case of market failure that needs to be addressed in this space, where the dynamics are changing fast and any intervention is likely to be behind the wave, either irrelevant or potentially damaging in terms of the long-term competitiveness of the European creative economy. This is not to say that no market failure will occur, but we consider it important that the market be given time to adjust to the technological changes that are driving new business models based on new consumer expectations and demand before any attempt is made to look to intervention.

6. We would also urge strongly that the Commission assesses what is already happening in this space. Much work on closely related issues is being done by other parts of the Commission, or even within DG Information Society & Media itself, that needs to be recognised. A prime example is the review of the TVWF Directive, and there are many others across the whole of the content value chain, from the review of the EU telecoms directives to the dedicated workstream aimed at encouraging the on-line distribution of European films within the new MEDIA 2007 programme, and actions under the i2010 initiative, including on Digital Libraries. It is important to consider not only the consistency of these different approaches but also the cumulative impact of them on a fast developing sector.

### **Views of cultural and memory institutions**

7. We have also sought the views of UK cultural bodies such as museums and galleries. Not surprisingly, these organisations have a somewhat different perspective from industry players. In terms of the scope and definition they are concerned that:

- The definitions and their coverage used in the Consultation questionnaire are not precise.

- Online publishing should include 'born digital' material to reflect the reality of the online world.
- It is not clear what is meant by 'educational content' within the Consultation context
- The 'Other' category in the definition should mention artists and artistic workers.
- Online performance art and interactive drama should also be specifically mentioned.

8. The consolidated response of such bodies, which addresses many of the specific questions asked, is attached to this paper at "B".

9. Furthermore, as film fulfils a cultural role in addition to its more industrial objectives, it often faces the same challenges as those outlined by the cultural institutions in Annex "B", in particular, the need for educational access and for digital preservation in order to ensure the safeguarding of our film heritage. Therefore, any action must recognise the inherent tensions within this complex area.

## **Comments on specific questions**

### **New business models**

10. We recognise that many stakeholders have a number of concerns regarding copyright issues. There is a need to provide legitimate access for users whilst respecting rights holders' interests. One concern is the greater potential for copyright infringement in the digital environment and we note how this can be a barrier to developing content related services in the online market, but welcome moves by content owners to develop new business models which permit the kind of access that consumers now expect.

### **Licensing and rights clearance**

11. We welcome the initiatives of DG Internal Market to foster effective cross-border management of copyright relating to online music. More generally, we recognise that a streamlined and more transparent EU-wide licensing of online services must be explored as part of the way forward with the aim of breaking down barriers to free trade within EU and to encourage competition between collecting societies. In the UK, collecting societies appear to recognise the need to deliver in the areas highlighted in the Commission's Recommendation of 18<sup>th</sup> May 2005 on collective cross-border management of copyright and related rights for legitimate online music services (2005/737/2005) and we are aware that projects are being undertaken that demonstrate that collecting societies are keen to provide cross-border licensing in a single approach. Such activities take time to set up and further intervention should not be considered until collecting societies have had an opportunity to take on board the issues raised in the Recommendation.

## **Piracy**

12. Both the E-Commerce Directive and the Enforcement Directive encourage the introduction of codes of conduct at Community level. Such codes coupled with appropriate behaviour of the parties involved will provide a framework for protection against online piracy. "Notice and takedown" procedures implemented by ISPs combined with appropriate use of these procedures by rights holders and their representatives would provide the necessary tools to allow copyright infringers to be removed from the market place. We would welcome further work in this area, taking into consideration the recommendations made in the European Film Online Charter as a starting point.

13. The UK government believes that online piracy should be tackled using a holistic approach that includes the framework outlined above, together with other suitable measures such as education and awareness raising activities.

## **Legal and regulatory issues**

14. An independent review examining the UK's intellectual property framework is currently underway. This review, led by Andrew Gowers a former editor of the Financial Times, is due to report its recommendations to the Chancellor of the Exchequer, the Secretary of State for Trade and Industry and the Secretary of State for Culture, Media and Sport in Autumn 2006. The UK government does not wish to preempt the review's findings and therefore, we will not comment substantially on the specific issues relating to copyright. We are however aware that stakeholder groups, are calling for action on a variety of issues, such as improved mechanisms for accessing orphan works, an extension to the term of protection for sound recordings, and exceptions which better meet the needs of the digital age.

## **Conclusion**

15. The Content Online initiative aims to build on the extensive work carried out on the Film Online Charter. The UK Government would therefore strongly urge the Commission to consider the "lessons learnt" through the drafting of the European Film Online Charter. For example, the drafting of the Charter involved all key industry players in its development including: industry experts, content owners, ISPs and telecom providers and film studios. Such a pan-industry involvement should be continued in future work in this area. It would also be useful to involve users/consumers in such work, especially given the economic and cultural importance now evident in user generated content. On the other hand, this exercise also drew out the inherent difficulties in agreeing on key issues, such as on the interoperability of Digital Rights Management systems (DRMs) for consumers and rights holders, on how the responsibility for stopping rights infringement should be shared between content owners and access providers, and on the need for efficient ways of licensing content (especially older films) for multiple territories. The Commission, Member States and industry must continue to work together to ensure that the content

industry continues to develop and remains competitive, finding the right balance between protecting consumers and rightsholders and responding to the needs of the industry and service providers.

16. Finally, the UK Government believes that media literacy should be mainstreamed into all areas of Community action regarding the digital world, including content online. It is essential that all European citizens are equipped with the necessary skills to understand, communicate, create and participate in today's media environment. We welcome the Commission's recently published consultation on media literacy and will be submitting a response in due course.

**October 2006**

# **ANNEX A: RESPONSE TO THE 'CONTENT ONLINE' QUESTIONS FROM PERSPECTIVE OF A CROSS-SECTION OF INDUSTRY PLAYERS**

## **Broadband Stakeholder Group**

### **Cross-industry UK response to Public Consultation on Content Online in the Single Market**

**13 October 2006**

#### **Background**

The Broadband Stakeholder Group is the UK government's advisory group on broadband take-up and services, and represents the views of over 400 players, large and small, across the UK broadband value chain<sup>1</sup>.

While BSG has co-ordinated this paper, the response has been written in consultation with a wider range of industries involved in the development and distribution of online content in the UK, including content players in the music, games and publishing industries via the Digital Content Forum<sup>2</sup>, broadcasters, ISPs, mobile operators, telecommunications and technology companies.

Many of these industry sectors, as well as individual companies, will be responding directly to this consultation and this paper does not attempt to summarise or represent any of those responses. Instead, the aim here is to complement detailed, sector-specific responses by offering a converged, cross-industry view from the UK on the issues raised in the consultation.

The topics covered by Content Online are wide-ranging, complex, contentious and, above all, crucial to the future success of UK and EU content businesses. As such they inspire lively debate and mean that unanimous views on the issues do not always exist. However, we have found it useful in the UK to consider these issues from a cross-industry perspective, and to identify commonalities and agreement where they exist – a process that has been supported by the UK government. It is on this basis that we offer this primarily strategic and top-level response to the question of how the EU can best support these emerging industries, rather than answering each question in detail.

#### **Introduction**

The creative industries are vitally important to the UK – representing 8.4% of GDP and growing at twice the rate of the economy as a whole<sup>3</sup> – and as such we strongly welcome the Commission's interest in this area, as well as the opportunity to respond to this consultation. It is in the interests of all EU citizens that online content industries are able to evolve and become more competitive in an environment that stimulates growth and attracts investment. We are committed to achieving these goals within the context of the i2010 and Lisbon agendas and welcome the

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<sup>1</sup> For more details see [www.broadbanduk.org](http://www.broadbanduk.org)

<sup>2</sup> For more details see [www.dcf.org.uk](http://www.dcf.org.uk)

<sup>3</sup> <http://www.ukinvest.gov.uk/2/d/10028/en/GB/1.0.html>

Commission's aim to capitalise on convergence and reap the full value of the emerging market for online content.

As the consultation document identifies, the rapid emergence of new content and services has presented consumers, government and industry with both opportunities and challenges, which will need to be overcome if we are to take full advantage of the digital opportunity. Challenges in the guise of piracy, the development of interoperable DRM systems, the creation of workable business models and the establishment of effective pricing and payment systems, for example, are being tackled by companies and industries on a daily basis, as other consultation responses will illustrate. However – and this is the key point this document wishes to make – we advise that DG InfoSoc shows restraint in attempting to solve these problems through new actions and initiatives at EU level, at this stage. These issues are already being dealt with through a combination of industry, member state and EU actions and/or reviews. While ongoing EU support for industry-led initiatives in the form of research, dialogue, information sharing and finance, for example in the battle against piracy, is welcome, we warn that additional EU intervention may be inappropriate at this time. There are three key points supporting this conclusion:

## Key points

### **1. Allow the market time to develop its own solutions**

Digital content markets are evolving and unpredictable, with new content, formats, distribution platforms and business models emerging and disrupting the status quo on an almost daily basis. As such, massive paradigm shifts in market dynamics are taking place, with structures, partnerships and interdependencies in flux. It is as yet unclear which approaches will be successful, and which new entities might yet emerge as key market players.

Such fundamental shifts and rapid developments have undoubtedly resulted in the emergence of a series of bottlenecks and obstacles, as companies take time to understand the new marketplace and find appropriate solutions. While there may not yet be agreement about how best to overcome these obstacles, there is strong consensus that the market, in the first instance, should be allowed time to develop its own solutions. It is also important to bear in mind that while this consultation process will produce a useful snapshot of the market, this is a market that is evolving at lightning speed. Many of the problems that will be cited may well prove to be transitory and will be resolved as part of the normal process of innovation and development – after all it is as much a commercial imperative, as a public policy one, to find a way through.

The dangers of prematurely formulating central policies and regulation, rather than allowing them to develop organically from within the marketplace, are serious. Not only will it deter and distract industry from developing its own solutions, but the risks of imposing inappropriate solutions onto a market in rapid flux are high – any intervention is likely to shape the market and potentially cause distortions with long-lasting and undesired consequences.

### **2. Policy, review and initiative overlap – the need for better regulation**

As the breadth of the consultation document demonstrates, the issues pertaining to the online content market are inter-related and wide-ranging, and so it is essential to consider EU policy implications in the round. However, we are aware that many of the questions raised in the Content Online document are already being addressed or reviewed elsewhere, both at EU and member state level. At present, the following EU activities have a bearing on the online content industries:

- Review of the Television without Frontiers Directive
- Review of the EU Regulatory Framework for electronic communications networks and services
- Review of the Copyright Acquis
- Review of the E-money Directive
- New Framework for Payments Directive
- Imminent review of the eCommerce Directive
- Potential review of Satellite and Cable Directive
- Public consultation on child safety and mobile phone services
- Commission recommendation on collective cross-border management of copyright and related rights for legitimate online music services

On top of EU initiatives, member state activities must be added. In the UK, the Gowers Review is in the process of a fundamental review of the UK intellectual property framework, for example.

The digital revolution has forced stakeholders to reassess the political and regulatory approach to the converging industries and means that the debates surrounding these policy and legislative processes are complex and the outcomes particularly significant. The majority of these activities are yet to be completed, and the effects they will have on industry are, in the main, unknown. With the principle of Better Regulation in mind and in order to avoid confusion and duplication, we therefore advise that DG InfoSoc allows existing activities to complete and monitors their effects before considering taking further measures.

### **3. National vs single market solutions**

The consultation document seeks to establish where the EU can take added-value actions in this area, but we would like to question the assumption that challenges facing the online content industry 'can be best addressed at European level' and believe instead that the principle of subsidiarity be applied.

Firstly, where obstacles do exist, there is little evidence to suggest that they result primarily from an inability to take advantage of the single market. As illustrated in point one, they are largely as a result of the rapid changes taking place at industry level, and therefore single market interventions may be inappropriate.

Secondly, it is not clear that EU level solutions are necessarily desirable or practical in each case. While a pan-European (as well as global) market for online content clearly exists, the factors determining the competitive success of the online content market – including infrastructure, cultural tastes and mores – are national in the first instance, meaning that issues such as content rating are most appropriately dealt with as close to the citizen as possible, at

Member State level. Attempting to find one-size EU level solutions to national problems may prove at best ineffective or at worst damaging.

We therefore recommend that in attempting to add-value, DG InfoSoc looks first to supporting the resolution of barriers to progress at a Member State level, before considering whether a European level remedies are is appropriate.

## **Summary**

In summary we strongly welcome the Commission's interest in this vitally important and rapidly developing market, and endorse the engagement with industry, through consultation. As we have outlined, the rapid evolution of the online content market means that a large number of obstacles to progress and issues are likely to exist. However, we strongly advise against DG InfoSoc taking new, additional actions to attempt to address these issues while activity within the marketplace and by member states and other parts of the EU is underway. Instead, we recommend that DG InfoSoc continue to monitor and maintain a dialogue with industry in order to understand the marketplace as it undergoes these fundamental developments.

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## **ANNEX B: RESPONSE TO 'CONTENT ONLINE' QUESTIONS FROM PERSPECTIVE OF CULTURAL INSTITUTIONS**

- The definitions and their coverage are not precise.
- Online publishing should include 'born digital' material.
- What is meant by 'educational content'?
- 'Other' should mention artists and artistic workers.
- Online performance art and interactive drama should also be specifically mentioned.

### ***Types of creative content and services online***

Q1. Do you offer creative content or services also online? If so, what kind of content or services? Are these content and services substantially different from creative content and services you offer offline (length, format, etc)?

- The entire arts sector is our primary focus.
- Some online activities are going in a different direction from off-line; for example, one gallery no longer prints catalogues, but uses them online instead.
- The National Representatives Group (NRG) has views on these activities.

Q2. Are there other types of content which you feel should be included in the scope of the future Communication? Please indicate the different types of content/services you propose to include.

- Creative content – artistic works, virtual reality, performance arts, interactive drama should all be included
- Music online – artistic works
- 'Born digital' published materials
- Blogs should be included in user-generated content

### ***Consumption, creation and diversity of online content***

Q3. Do you think the present environment (legal, technical, business, etc) is conducive to developing trust in and take-up of new creative content services online? If not, what are your concerns: Insufficient reliability / security of the network? Insufficient speed of the networks? Fears for your privacy? Fears of a violation of protected content? Unreliable payment systems? Complicated price systems? Lack of interoperability between devices? Insufficient harmonisation in the Single Market? Etc.

- Copyright is a concern. The key issue is ensuring that access can be given for educational purposes, whilst respecting the interests of rights-holders. BUT fear of copyright infringement is a big barrier for the cultural sector, and there should be clear ways of publishing

institutional collections online without fear of legal action for tiny sums of money.

- Preservation – there is a need to digitise materials for preservation purposes, even if access cannot be granted online.
- Interoperability on software and formats, eg. Realplayer vs MS MediaPlayer.
- Interoperability on metadata and standards, and equivalent to WAI guidelines for marking up content to make it easily retrievable.
- Micro-payments systems and account protection
- Interoperability between digital rights management (DRM) and payments systems – users come across many systems.
- Authentication systems.
- Spamming leads to users not trusting online services.

Q4. Do you think that adequate protection of public interests (privacy, access to information, etc) is ensured in the online environment? How are user rights taken into account in the country you live/operate in?

- Users have a right to access services online as well as physically.
- There is inadequate protection of privacy.
- More needs to be done to communicate citizens' rights. The average user is not aware of data held on his/her computer.

Q5. How important for you is the possibility to access and use all online content on several, different devices? What are the advantages and/or risks of such interoperability between content and devices in the online environment? What is your opinion on the current legal framework in that respect?

- Pricing should be related to mode and platform of consumption.
- There is a long way to go on device interoperability.
- Rights collecting societies are not ready for the digital age.
- Quality varies on different devices, which should lead to differential pricing for consumers.
- There is a risk of being led by what technology can do, rather than by what users want/need.

Q6. How far is cultural diversity self-sustaining online? Or should cultural diversity specifically be further fostered online? How can more people be enabled to share and circulate their own creative works? Is enough done to respect and enhance linguistic diversity?

- We strongly support cultural diversity online, and content in minority languages (in UK – Welsh and Gaelic), as well as languages of communities that have moved to the UK.
- We support access by diverse communities – and encouragement to create community content.
- Multilingual access is needed, as is support for investment for further research and development.
- The online environment naturally lends itself to cultural diversity.

## ***Competitiveness of European online content industry***

Q7. If you compare the online content industry in Europe with the same industry in other regions of the world, what in your opinion are the strengths and weaknesses of our industry in terms of competitiveness? Please give examples.

- A strength is the development of new business models and the transition of traditional ones into the digital world.
- The EU is weak compared with the West Coast of the USA, where there are many social networking sites etc.
- The EU faces greater market and language barriers than the USA does.
- A strength is our cultural heritage and creativity.

Q8. Where do you see opportunities for new online content creation and distribution in the area of your activity, within your country/ies (This could include streaming, PPV, subscription, VOD, P2P, special offers for groups or communities for instance schools, digital libraries, online communities) and the delivery platforms used. Do you intend to offer these new services only at national level, or in whole Europe or beyond? If not, which are the obstacles?

- Content and services should be available to all citizens at a time and place that suits them.
- The digital divide, multilingualism and copyright are obstacles.
- National differences in IPR are a barrier.
- Rights collecting societies have created barriers to free trade within the EU.
- A European Cultural Information Space/Digital Library should be inclusive of a wide definition of cultural content, not just books. This should support the development of customized thematic gateways across Europe – distributed systems enabling development of customized, curated/interpreted content.
- Cheaper and faster broadband to deliver video to the desktop, especially important in rural communities.

Q9. Please supply medium term forecasts on the evolution of demand for online content in your field of activity, if available.

- Cultural institutions are reporting 50% growth in online use per annum.

Q10. Are there any technological barriers (eg. download and upload capacity, availability of software and other technological conditions such as interoperability, equipment, skills, other) to a more efficient online content creation and distribution? If so, please identify them.

- See question 3.

- Getting semantic web to work.
- Access to grid computing for the cultural sector.
- Digital preservation.
- Interoperability between learning platforms.
- Technology becomes irreparable or irreplaceable.

Q11. What kind of difficulties do you encounter in securing revenue streams? What should in your view be the role of the different players to secure a sustainable revenue chain for creation and distribution online?

- A reluctance by consumers to pay.
- Creative Archive Licence Group is suggesting an equivalent to Public Lending Right as a way to better balance increased access with the interests of rights-holders – perhaps linked to quality and non-commercial use of content.

### ***Payment and price systems***

Q12. What kinds of payment systems are used in your field of activity and in the country or countries you operate in? How could payment systems be improved?

- There is a need for trusted micro-payment systems.

### ***Licensing, rights clearance, right holders remuneration***

Q14. Would creative businesses benefit from Europe-wide or multi-territory licensing and clearance? If so, what would be the appropriate way to deal with this? What economic and legal challenges do you identify in that respect?

- Yes, though we shall also need to examine the outcomes of the Gowers Review of copyright and the British Library IPR manifesto.
- See 11.

Q15. Are there any problems concerning licensing and/or effective rights clearance in the sector and in the country or countries you operate in? How could these problems be solved?

- Tracing rights holders in respect of orphan works.

Q16. How should the distribution of creative content online be taken into account in the remuneration of the right holders? What should be the consequences of convergence in terms of right holders' remuneration (levy systems, new forms of compensation for authorised/unauthorised private copy, etc)?

- People should be paid for the creation of content, and rights come as commissioned.

- A new model for public library lending for econtent.

### ***Legal or regulatory barriers***

Q18. How does the country you mainly operate in encourage the development of creative online content and services?

- Through the National Lottery, but this investment/initiative has not yet been fully capitalized.
- Episodic commitment is a barrier to development.
- Public/private partnerships, eg. Microsoft/Google/Tate sponsorship
- 'Born digital' artwork needs to be encouraged.
- Central government grant-in-aid has no specific allocation for digitisation.
- Works of public content should be hosted in education networks.
- A lack of matching funding for EU projects is a barrier for public sector organizations when this content specifically required.

### ***Release windows***

Q19. Are "release windows" applicable to your business model? If so, how do you assess the functioning of the system? Do you have proposals to improve it where necessary? Do you think release windows still make sense in the online environment? Would other models be appropriate?

- No

### ***Networks***

Q20. The Internet is currently based on the principle of "network neutrality", with all data moving around the system treated equally. One of the ideas being floated is that network operators should be allowed to offer preferential, high-quality services to some service providers instead of providing a neutral service. What is your position on this issue?

- It is important to retain neutrality; this is essential in tackling the digital divide, providing educational opportunities and building online markets.

### ***Piracy and unauthorised uploading and downloading of copyright protected works***

Q21. To what extent does your business model suffer from piracy (physical and/or online)? What kinds of action to curb piracy are taken in your sector/field of activity and in the country or countries you operate in? Do you consider unauthorised uploading and downloading to be equally damaging? Should a distinction be made as regards the fight against pirates between "small" and "big" ones?

- The arts sector wants its content to be found online.

- Digital rights management systems should enable the inclusion of licences that enable use and re-use of content, such as Creative Commons and Creative Archive.

### ***Rating or classification***

Q24. Is rating or classification of content an issue for your business? Do the different national practices concerning classification cause any problem for the free movement of creative services? How is classification ensured in your business (self-regulation, co-regulation)?

- Some cultural organizations support creative artists whose content is suitable only for those aged 18 or over; organizations would welcome guidance on how to guide users.

### ***Complementing commercial offers with non-commercial services***

Q30. In which way can non-commercial services, such as opening archives online (public/private partnerships) complement commercial offers to consumers in the sector you operate in?

- Rich resources are made available for personal re-use and public/private partnerships.
- Commercial educational content often lacks visual content; this can be supplied by partnership with the cultural sector.
- Building relationships between commercial resource providers (eg. Ancestry.com) and public archives for items such as adoption papers etc that institutions have an obligation to provide under Freedom of Information requirements.

### ***What role for equipment and software manufacturers?***

Q32. What could be the role of national governments/regional entities to foster new business models in the online environment (broadband deployment, inclusion, etc)?

- To encourage sustained investment, and long-term planning/thinking, although interfaces may change.
- Improved access to collections can lead to increased engagement and social inclusion; there is a need to find evidence for impact leading to greater social outcomes.
- Difficult to evaluate and compare web statistics and performance across national borders.
- Need for standard cost benchmarks to help ascertain if a proposal is cheap or expensive.

Q33. What actions (policy, support measures, research projects) could be taken at EU level to address the specific issues you raised? Do you have concrete proposals in this to address the specific respect?

- Establish standards around log-file analysis.
- 100% marginal cost models, ie. make money available without the need for matching funds.