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European Commission
DG COMP
State aid registry
1049 Brussels
"HT.963"

FEP comments to the review of the Communication from the Commission on the application of state aid rules to public service broadcasting

FEP is an independent, non-commercial umbrella association representing 26 national associations of book publishers of the European Union and of the European Economic Area. Founded in 1967, FEP deals with European legislation and advises publishers' associations on legislative issues.

FEP welcomes the fact that the Commission is seeking stakeholders input when considering an assessment of the future framework which will apply to State funding of public service broadcasting.

So far, the Broadcasting Communication has proven to be most effective and we can only encourage the Commission to keep making sure that the possible adverse effects on competition when service broadcasting is supported with public money is properly weighed and taken into account.

According to the definition included in the Communication, certain activities other than TV programmes in the traditional sense, such as online information services, can be included as "public service remit". However, publishers are increasingly investing in new online business models and in some publishing sectors like the educational publishing industry, the online market for learning material is already an existing, vibrant and competitive one. Therefore it is crucial that the activities carried out by public service broadcasters do not have an adverse market impact competing unfairly with publishers in the private sector.

In our view, the current definition should not be broadened and public broadcasters especially in such cases must strictly observe the principles of transparency, proportionality and accountability. Moreover, it is absolutely paramount for publishers that overcompensation and possible cross-subsidies into commercial activities are excluded and that the right mechanisms are in place to avoid anti-competitive situations.

Should you need any further information about our position on this matter, we remain at your entire disposal.

Yours faithfully,

Fédération des Editeurs Européens / Federation of European Publishers