



European Association of Directory and Database Publishers

**Comments on the Commission Staff Working Paper  
“Strengthening the Competitiveness of the EU Publishing Sector –  
The role of media policy”  
November 15<sup>th</sup> 2005**

*Founded in 1966, the EADP (European Association of Directory and Database Publishers) represents publishers of telephone directories, yellow pages and business-to-business database publishers producing information products for both B2C and B2B markets. Membership consists of 187 members in 37 countries worldwide, including companies based in 24 of the EU Member States as well as in the Eastern European countries (Bulgaria, Romania and Russia) and Norway. Database publishers generate an estimated turnover of at least 11 billion euro in Europe, employ roughly 37 000 people and produce products and information services which are used daily by most EU citizens and are in day-to-day commercial contact with more than four million advertisers. Our member companies provide both paper and on-line databases.*

As a preliminary comment, EADP members stress again that the directory and database sector in Europe is a vibrant and important element of the business world and operates in a highly competitive environment.

EADP members are happy to comment on the Commission Staff Working Paper “Strengthening the Competitiveness of the EU Publishing Sector – The role of media policy” and welcome the consultation as an opportunity to improve the dialogue between directory and database publishers and the Commission.

They would like to renew their support for the introduction of the directory and database publishing sector into the NACE classification from 2007 which will enable new technologies to be taken into account and to better encompass the realities of the Media and Information sector. This should also generate accurate data on the directory and database sector as a whole.

However, they notice that the directory and database publishing sector is barely mentioned in the document, although several studies had been conducted on the publishing sector and encompass data concerning directories. These relate to studies conducted by the Commission itself<sup>1</sup> and also to data collected by the EADP among its membership and publicly available<sup>2</sup>.

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<sup>1</sup> “Publishing Market Watch, Sector Report 4: The European Directories Market”, conducted by Turku School of Economics and Business Administration and Rightscom for DG Enterprise, 2004; “The EU publishing industry: an assessment of competitiveness”, conducted by PIRA International for DG Enterprise, 2003; “Competitiveness of the European Union publishing industries”, conducted by the Turku School of Economics and Business Administration for DG Enterprise, 1999.

<sup>2</sup> EADP Annual Report 2005.



*European Association of Directory and Database Publishers*

EADP members would like to comment on the indicators highlighted by the Commission as having an impact on the publishing sector.

- For business-to-consumer directories that are distributed in paper, this raw material is still an important cost. However, this does not constitute a major cost for all directory publishers since a large number of directories and databases are now online, in particular business-to-business databases.

- Other costs than those mentioned in the document have to be taken into consideration. Content costs are among them. These are still very high in some EU Member States despite the enforcement of the directive 2003/98/EC relating to the access and re-use of public sector information for commercial and non-commercial purposes, since prices are not always fair, cost-oriented and transparent, and despite the favourable evolution of jurisprudence and recent decisions of regulatory authorities in Member States concerning the price of basic subscriber data provided by telecommunication operators to directory publishers.<sup>3</sup>

- As stated in the document, advertising is an important source of revenues for directory publishers. EADP members would support actions envisaged by the Commission and aimed at relaxing advertising restrictions on regulated professions.

- Furthermore, as mentioned in the document, piracy is an important risk for content providers and legal protection of the investment put into creation and maintenance of databases is essential for the sustainability of directory publishing. EADP members are in favour of maintaining the sui generis right in force.

- Finally, EADP members would like to draw the attention of the European Commission on the fact that traditional business-to-consumer directories are under very real competitive threat from non-traditional players of the digital field. Search engines, such as Google, are attracting both consumers and advertisers that until recently looked for information or chose to advertise on Yellow Pages websites.

EADP members are looking forward to the next Publishers' Forum and hope it will have a very positive input. They would like to express their wish to carry on and improve the collaboration with the Media Task Force and welcome its support. When possible they would welcome being consulted more often and earlier in the legislative process.

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<sup>3</sup> High Regional Court of Düsseldorf, case *Telegate v/ Deutsche Telekom*, June 22<sup>nd</sup> 2005; Regional Court of Cologne, case *Telegate v/ Deutsche Telekom*, August 31<sup>st</sup> 2005; decision of the German Federal Network Agency (*Bundesnetzagentur für Elektrizität, Gas Telekommunikation, Post und Eisenbahnen*), August 17<sup>th</sup> 2005.