



Review of Must-Carry Obligations

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EXECUTIVE SUMMARY

Operators of certain TV broadcast networks that are used by a significant number of end-users as the principal means to receive TV broadcasts are subject to must-carry obligations. This requires them to reserve part of their network capacity for the retransmission of TV channels qualifying as meeting General Interest Objectives (GIOs). The manner in which such obligations may be imposed is defined in Regulation 49 of the Electronic Communications Networks and Services (General) Regulations (Cap. 399.28).

At present must-carry obligations apply only to Melita's digital cable TV network. Must-carry obligations on Melita's analogue cable TV network were removed following a review in 2013. A significant development has been observed since the review in 2013, namely a substantial increase in GO's fixed line Internet Protocol TV (IPTV) subscriptions.

As a result of this development the MCA feels it is necessary to consult publicly once again in order to review the TV broadcast networks subject to must-carry obligations. The consultation will run from **4th July 2016** to **8th August 2016**. Please refer to **Section 5** for further details about the submission of comments.

Once the responses to the above consultation have been analysed and given due consideration, the MCA will make its decision with respect to those TV broadcast networks that should be subject to must-carry obligations.

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DEFINITIONS

General Interest (GI) TV channel	A TV channel that is identified by the Broadcasting Authority (BA) as qualified to meet General Interest Objectives (GIOs) and thus entitled for carriage on the GI TV broadcast network and for 'must-carry status'.
TV broadcast network or TV network	An electronic communications network used for the distribution of television services.
GI TV broadcast network	The free-to-air Digital Terrestrial TV (DTT) broadcast network managed by Public Broadcasting Services Limited (PBS) and set up solely for the initial transmission of the digital and unencrypted GI TV channels (free-to-air).
GI broadcaster	An entity having editorial control over a GI TV channel.
Pay TV operator or operator	An undertaking, other than PBS, providing electronic communications networks used for the distribution of TV broadcast channels and offering TV services, normally against subscription.
Commercial TV network	A TV broadcast network other than the GI TV broadcast network.

1. BACKGROUND

In December 2011 the Malta Communications Authority (MCA) published *Guidelines* on determining which TV broadcast networks would be subject to must-carry obligations¹.

In February 2012 the MCA issued a decision stating that GO plc (hereafter 'GO') does not need to be designated as having must-carry obligations on its terrestrial digital TV (DTT) network, whilst Melita plc (hereafter 'Melita') was designated as having must-carry obligations of the six identified GI TV channels² on both its analogue as well as its digital cable TV networks³.

In September 2012 the Broadcasting Authority (BA) granted an additional GI broadcasting licences to Xejk (previously called Calypso Music Channel) as the seventh GI TV channel.

In August 2013 the MCA decided that must-carry obligations should no longer apply to the Melita Cable analogue tier.⁴ This decision was taken in light of the prevailing market conditions which clearly indicated a consistent decline in the number of subscribers, reaching a rather low percentage amount of overall TV network subscriptions. Spectrum efficiency issues represented by analogue technology also had a significant bearing on the decision.

In October 2015, the BA granted an additional GI broadcasting licence to the Parliament TV as the eighth GI TV channel.

Meanwhile, another significant development has also been observed since the last review of must-carry obligations in 2013, namely a substantial increase in GO's fixed line Internet Protocol TV (IPTV) subscriptions.

1.1 Must-Carry Rules

Must-carry rules require TV channels to be carried over certain TV broadcast networks. The specified TV channels qualify for must-carry status when they meet clearly defined GIOs. Must-carry rules thus contain two aspects:

¹ Refer to:

<http://mca.org.mt/sites/default/files/attachments/faqs-and-guidelines/2012/guidelines-on-must-carry-obligations.pdf>

² TVM, TVM 2 (previously called Education 22), Net TV, One TV, Smash TV and f Living (previously called Favourite Channel).

³ Refer to:

<http://www.mca.org.mt/sites/default/files/attachments/decisions/2013/must-carry-designations-obligations-MCAD12-0768.pdf>

⁴ Refer to:

<http://www.mca.org.mt/sites/default/files/attachments/decisions/2013/Decision%20Document%20Must%20Carry%20publ%2030-09-13.pdf>

- **must-carry status:** granted to broadcasters that provide a GIO television service as determined by the BA;
- **must-carry obligations:** obligations for pay TV operators to reserve a part of their network capacity for the retransmission of TV channels enjoying must-carry status (i.e. GI TV channels).

1.2 Obligations Concerning Content

GIOs equate to a public service remit, and are carried out primarily by PBS, the national public service broadcaster, through its two TV channels TVM and TVM 2. The remaining part of the remit complementing the PBS programming is entrusted to Parliament TV and broadcasters of privately-owned TV channels (f Living, Net TV, One TV, Smash TV and Xejk).

In line with the Broadcasting Act (Cap. 350 of the Laws of Malta), the BA has identified these eight TV channels as meeting GIOs and have been issued with a GI broadcast content licence accordingly. Collectively, these public and private TV channels are referred to as 'GI TV channels'.

PBS is appointed by Government as the network operator responsible for setting up, operating and managing a DTT network for the initial transmission of all the GI TV channels, in standard definition (SDTV) format, which is unencrypted and thus available to all viewers on a free-to-air basis.⁵

1.3 Legal Basis for Must-Carry Obligations

The legal basis for imposing must-carry obligations is Regulation 49 of the Electronic Communications Networks and Services (General) Regulations (2011) (SL 399.28 of the Laws of Malta). A transposition of Article 31 of the Universal Service Directive, Regulation 49 states that⁶:

"49.(1) The Authority [MCA] may impose reasonable "must-carry" obligations for the transmission of specified radio and television broadcast channels and complementary services, particularly accessibility services to enable appropriate access for disabled end-users, on undertakings providing electronic communications networks used for the distribution of radio or television broadcasts channels to the public where a significant number of end-users of such networks use them as the principal means to receive radio and television broadcasts:

Provided that such obligations shall only be imposed where they are necessary to meet clearly defined general interest objectives and shall be proportionate and transparent.

(2) The Authority may determine, in a proportionate and transparent manner, the appropriate remuneration, if any, in respect of measures taken in accordance with subregulation (1):

⁵ PBS has an agreement with GO to establish and maintain a DTT network, on behalf of PBS, to transmit the GI TV channels on the frequency assigned to PBS (currently Channel 66 UHF which is planned to be replaced with Channel 43 UHF) for the transmission of all GI TV channels.

⁶ Refer to: <http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=10563>

Provided that in doing so the Authority shall ensure that in similar circumstances there is no discrimination in the treatment of undertakings providing electronic communications networks.

(3) The Authority shall review "must carry" obligations on a regular basis" (S.L.399.28, 2011 p. 36).

1.4 Must-Carry Guidelines

On the 2nd December 2011 the MCA published its *Guidelines on Must-Carry Obligations* (hereinafter referred to as the '*Guidelines*') which provided the framework for determining how must-carry obligations should be imposed on a pay TV operator.

The *Guidelines* balance the interest of TV viewers against the commercial interests of pay TV operators. They safeguard universal availability of general interest content on all prevalent TV broadcast networks. At the same time they aim for equitability in network capacity required for the retransmission of the GI TV channels identified by the BA.

The *Guidelines* which remain relevant in determining TV network operators subject to must-carry obligations are provided below for ease of reference:

Guideline 1: When determining which networks are used by a significant number of users, the MCA will consider the state of technological and market development, market structure, as well as target markets.

Guideline 2: When determining which networks are used as the principal means to receive TV broadcasts the MCA will take into account, *inter alia*, the number of end-users with connections to two or more TV broadcast networks.

Guideline 3: Where must-carry obligations place an excessive or undue burden on the operator of a particular network, the MCA will, where it deems appropriate, consider alternative measures for the GI TV channels to be seamlessly available to all end-users of that network provided that no undue burdens are placed on end-users.

Guideline 4: When determining whether remuneration for the retransmission of the GI TV channels should be provided, the MCA will need to satisfy itself that any remuneration provided can be justified.

1.5 Must-Carry Obligations

As stated in the *Guidelines*, when imposing must-carry obligations on providers of the respective networks used for television and radio distribution services a designated TV operator is required to:

- reserve part of the network capacity for the retransmission of the GI TV channels;
- transmit complementary services, particularly accessibility services to enable appropriate access for disabled end-users; and

-
- ensure that the transmission and picture quality of the GI TV channels is of an appreciable and comparable quality to that of the initial (free-to-air) transmission.

Network capacity

An operator subject to must-carry obligations is required to carry the GI TV channels on its network if this is used by a significant number of users as the principal means of receiving TV broadcasts, as indicated by the MCA.

This entails making part of its network capacity available for the retransmission of these channels. The reserved capacity must be sufficient to ensure that audiovisual quality is of an appreciable and comparable quality to that of the initial transmission via DTT⁷ (refer also to Technical Parameters below).

Complementary Services

Regulation 49 of the Regulations allows for the must-carry obligations to include “*complementary services, particularly accessibility services to enable appropriate access for disabled end-users*”. The MCA requires the operator to retransmit alongside the respective GI TV channel:

- teletext and electronic programme guide (EPG) services, where applicable; and
- accessibility services, as defined by the BA from time to time and applicable to the GI TV channels.

Technical Parameters

The technical terms by which the GI TV channels are to be retransmitted rest with the operator. The quality of the GI TV channels, however, impacts user experience and should match that of the initial transmission. Thus the picture quality of the GI TV channels should be of an appreciable and comparable quality to that of the initial (free-to-air) transmission.

⁷ A GI broadcaster is allotted enough bandwidth by the BA to transmit free-to-air in standard-definition (SD) TV format.

2. OVERVIEW OF THE TV BROADCASTING SECTOR

The situation, as far as the number and types of transmission platforms are concerned, presents no material changes from the last review carried out in 2013. TV channels continue to be broadcast on the following networks:

- Free-to-air DTT network (GI TV broadcast network) operated by the national TV broadcaster, PBS.
- Commercial analogue and digital cable TV networks.
- Commercial DTT and Internet Protocol TV (hereafter 'IPTV') networks.

A survey of domestic (i.e. excluding commercial use) take-up of pay TV platforms carried out by the MCA between October and November 2015⁸ shows that vast majority of households (94%) are subscribed to a pay TV package with at least one of the local pay TV operators. The survey showed that 45% of households with a TV connection are subscribed to a Melita TV platform whilst 50% of households having a TV connection are subscribed with a GO TV platform.

The actual subscriptions by platform between 2013 and Q1/2016⁹ are reflected in **Table 1** below:

Pay TV Network	Subscriptions			
	2013	2014	2015	Q1/2016
Melita				
Analogue Cable TV services	7,495 (5%)	6,848 (5%)	6,092 (4%)	5,896 (4%)
Digital Cable TV services	73,172 (49%)	71,298 (48%)	72,622 (49%)	71,436 (48%)
GO				
DTT services	62,284 (42%)	57,478 (39%)	51,390 (34%)	50,201 (34%)
IPTV services	5,954 (4%)	12,256 (8%)	19,274 (13%)	20,602 (14%)
Total Subscriptions	148,895	147,880	149,378	148,135

Source: MCA Data Report Sheets

⁸ Refer to: <http://www.mca.org.mt/surveys/consumer-perceptions-survey-broadcasting-services-2015>. It is noted that the survey considered private households and excluded business subscriptions. The survey results do not present the actual market share figures.

⁹ Refer to: <http://www.mca.org.mt/market-overview>

The analogue cable TV platform has continued to see a drop in the number of subscriptions. In the last review (2013) the MCA removed the must carry obligation from the analogue cable TV platform in light of the prevailing market conditions, which clearly indicated that patronage was dwindling. This was seen in the context of the existence of an equivalently priced digital offering that provides a larger number of channels, including the GI TV channels. It is also easy to switch from the analogue tier to its digital cable equivalent from both a technology and a price standpoint. Spectrum efficiency issues represented by analogue technology also had a bearing on the decision to remove must-carry obligations from the analogue cable TV platform.

As from September 2014 carriage arrangements on the analogue cable TV platform have been on a commercial basis, i.e. without any regulatory intervention of sorts. The number of active subscriptions is now at around 4% of total subscription levels.

The digital Cable TV and DTT platforms still retain a significant number of overall subscriptions. In addition IPTV subscriptions over the past two years have increased significantly. This occurrence can be explained by the fact that GO is actively promoting its IPTV platform which is more content-rich than its DTT platform and offers additional features including widgets, high-definition (HD) channels and simultaneous recording, amongst others.

2.1 Free-to-air DTT network

The free-to-air DTT network, or GI TV broadcast network, is owned and managed by PBS. The network is set for the initial transmission of all the GI TV channels, as identified by the BA, in digital and unencrypted form (free-to-air). The channels in question are: TVM, TVM 2, f Living, Net TV, ONE TV, Smash TV, Xejk and, as from October 2015, the Parliament TV Channel.

Around 4% of all households rely solely on free-to-air broadcasts to receive and watch local TV. In addition to these households all viewers with a DTT tuner, including GO DTT subscribers, can also seamlessly view the GI TV channels, given their transmission in unencrypted form.

2.2 Pay TV networks

Melita's digital cable TV network carries the local SD and HD TV channels (TVM HD, TVM2 HD, and NET HD) on all of its three current packages:¹⁰

- The M plan: 44 digital TV channels, 3 HD TV channels and 48 Digital Music Channels & 16 Radio Stations;
- The L plan: provides 87 digital TV channels, 8 HD TV channels and 48 Digital Music Channels & 16 Radio Stations; and
- The XL plan: provides 125 digital TV channels, 10 HD TV channels and 48 Digital Music

¹⁰ Refer to Melita's website (June 2016): https://www.melita.com/tv_category/tv-packages/

Channels & 16 Radio Stations.

GO's DTT network carries the local SDTV channels on all of its 3 current TV packages.¹¹ The Gold package offers 50+ Digital TV Channels. The Silver package offers 40+ Digital TV Channels. The Bronze package offers 20+ Digital TV Channels. No HD TV Channels are offered on these packages.

GO's IPTV network carries all local SD and HD TV channels (TVM HD, TVM2 HD, NET HD and One HD), offered on both of its current TV packages:¹²

- Gold Interactive: 100+ Digital TV Channels; and
- Silver Interactive: 70+ Digital TV Channels.

¹¹ Refer to GO Plc's website (June 2016): <https://www.go.com.mt/personal/tv/packages/tv-packages>

¹² Refer to GO Plc's website (June 2016): <https://www.go.com.mt/personal/tv/packages/tv-packages>

3. ASSESSMENT OF MUST-CARRY DESIGNATIONS

This section reviews the pay TV operators subject to must-carry obligations in view of the substantial increase in GO's IPTV subscriptions over the past two years. In reviewing the pay TV operators subject to must-carry obligations the MCA took into consideration the established *Guidelines*.¹³

3.1 TV Networks used by a significant number of users

Guideline 1 states that “when determining which networks are used by a significant number of end users, the MCA will consider the state of technological and market development, market structure, as well as target markets.”

In line with Guideline 1 the MCA considers that the commercial digital Cable TV and DTT broadcast networks continue to be used by a significant number of end-users to receive television broadcasts:

- **Melita - Digital Cable TV:** The digital Cable TV network launched in 2005 continues to enjoy a significant market share of households, estimated at 48% as at the end of Q1/2016 (equivalent to 71,436 subscriptions).
- **GO - Digital Terrestrial TV:** The commercial DTT network launched in 2005 continues to enjoy a significant market share of households, estimated at 34% as at the end of Q1/2016 (equivalent to 50,201 subscriptions).

The number of subscribers on GO's IPTV network launched in 2011 has seen an increase of 14,648 subscriptions (from 5,954 to 20,602) between 2013 and Q1/2016. This now equates to around 14% of the total population of pay TV subscribers. The amount of GO IPTV subscriptions, coupled with the ongoing rapid uptake, reflects that the IPTV platform is now used by a significant number of end users.

As expected the analogue Cable TV platform has continued to see a drop in subscriptions and, as concluded in the 2013 must-carry review, the number of current subscriptions (5,896) cannot be considered as significant. This has to be seen in the context of spectrum efficiency issues represented by analogue technology and a suitable replacement offering available to the remaining analogue subscribers.

¹³ Refer to:

<http://mca.org.mt/sites/default/files/attachments/faqs-and-guidelines/2012/guidelines-on-must-carry-obligations.pdf>

3.2 TV Networks used as principal means to receive TV broadcasts

Guideline 2 states that “when determining which networks are used as the principal means to receive TV broadcasts, the MCA will take into account, *inter alia*, the number of end-users with connections to two or more TV broadcast networks”.

A recent survey carried out by the MCA between October and November 2015 found that only 5.5% of households are connected to two or more pay TV networks. This result confirms that the three prevalent TV broadcast networks - Digital Cable TV, DTT, and IPTV - are all used by their respective end-users as the principal means of receiving TV broadcasts.

3.3 Principle of reasonableness

Guideline 3 states that “where must-carry obligations place an excessive or undue burden on the operator of a particular network, the MCA will, where it deems appropriate, consider alternative measures for the GI TV channels to be seamlessly available to all end-users of that network provided that no undue burdens are placed on end-users.”

In line with Guideline 3 when imposing a must-carry obligation on a particular operator the MCA must consider, among others, whether the imposition of a must-carry obligation on a particular operator entails an excessive or undue burden on the operator of particular network. In this regard the MCA, where it deems appropriate, considers proposals on the part of an operator subject to a must-carry obligation for alternative ways of conveying the GI TV channels to their end-users.

When considering any such requests the MCA is guided by the need to ensure that such channels will be seamlessly available to all end-users of that particular network with no undue burdens placed on end-users.

In its 2012 must-carry designation the MCA reached the following conclusion with regard to the principle of reasonableness on the commercial DTT network operator:

“The MCA is conscious that under current circumstances, must-carry obligations on commercial DTT network operators would result in unnecessary duplication of TV transmissions. This, in turn, leads to inefficient use of spectrum.

For the purposes of spectrum efficiency, therefore, DTT operators would not be obliged to retransmit the GI TV channels on their DTT network; provided that the equipment supplied to their end-users to receive the pay TV channels can be seamlessly used to receive the initial transmissions of the GI TV channels.”

The MCA therefore does not impose must-carry obligations on GO’s DTT network. To do so would amount to unnecessary duplication, given that viewers can access the PBS-run network over the

same set-top box. The situation has not changed since the 2013 review of must-carry obligations and therefore the MCA is of the opinion that this position does not warrant any change in approach.

In the case of Digital Cable TV and IPTV the imposition of must-carry obligations does not place an excessive or undue burden on the operators of the respective commercial networks. There is no excessive or undue burden for the operators to reserve part of the network capacity for the retransmission of the current eight GI TV channels.

Melita Cable currently advertises a maximum of 183 TV channels on its XL package and a minimum of 95 TV channels on its M package. In addition, all local TV stations (including the following local HD channels: TVM HD; TVM2 HD and NET HD) are included in both offers. This would indicate adequate capacity to carry the eight GI TV channels without any undue burden on the operator.

Similarly GO's IPTV currently advertises over 100 Digital TV Channels on its Gold Interactive package and over 70 Digital TV Channels on its Silver Interactive Channel. The IPTV network operator already carries all local TV stations (including all the local HD Channels - TVM HD, TVM2 HD, NET HD and ONE HD) through its 'Silver Interactive TV' and the 'Gold Interactive TV' packages. This would indicate adequate capacity to carry the eight GI TV channels without any undue burden on the operator.

3.4 Remuneration

Guideline 4 states that 'when determining whether remuneration for the retransmission of the GI TV Channels should be provided, the MCA will need to satisfy itself that any remuneration provided should be justified.'

Due to nature of the TV services provided, PBS (the GI TV broadcast network operator) and pay TV operators have adopted different remuneration models. As the GI network operator, PBS provides its unencrypted, GI TV Channels on a free-to-air basis.

This business model does not allow PBS to recover costs associated with the initial transmission of the GI TV channels from its viewers. It therefore seeks remuneration from the broadcasters of the GI TV channels carried over the GI network.

In contrast, pay TV (network) operators have a direct relationship with their subscribers. In particular, operators providing wired services, such as cable and IPTV, can access their subscribers' premises for the purpose of installing a connection to their network. Subscribers are typically charged for receiving the GI TV channels, normally packaged with other channels.

Whilst acknowledging that must-carry obligations may place a cost burden on the undertaking, the MCA cannot ignore the fact that pay TV operators recover costs through subscription fees and are not required to pay any copyright fees associated with the retransmission of the GI TV channels.¹⁴

In its must-carry designation of 2012 the MCA concluded that it would be disproportionate for pay-TV operators to be remunerated further by broadcasters or the State for the retransmission of the GI TV channels. Furthermore, any request on the part of an operator for any remuneration would need to be justified. This argument still holds today.

¹⁴ GI TV broadcasters cannot prohibit retransmission and cannot charge copyright fees for the retransmission of their content. These requirements emanate from the Copyright Act and from Broadcast Act respectively.

4. PROPOSED DECISION

Based on the above assessment must-carry obligations on the Digital Cable TV network for the carriage of the identified GI TV channels will continue to apply irrespective of any packages offered on this platform.

In addition, the MCA is proposing that must-carry obligations with respect to the carriage of the identified GI TV channels will apply to the IPTV network irrespective of any packages offered on this platform.

Authorised Provider under the General Authorisation Regime ¹⁵	GO plc		Melita plc	
	DTT	IPTV	Analogue Cable TV	Digital Cable TV
Guideline 1: Network is used by a significant number of users	Yes	Yes	No	Yes
Guideline 2: Network is used as the principal means to receive TV broadcasts	Yes	Yes	Yes	Yes
Guideline 3: Alternative measures for the GI TV channels to be seamlessly available to all end-users of that network provided that no undue burdens are placed on end-users.	Satisfied	Not applicable	Not applicable	Not applicable
Designation of Must-Carry Obligation	No	Yes	No	Yes

Must-carry obligations on Melita’s Digital Cable TV network and GO’s IPTV network will continue to safeguard the carriage of all the GI TV channels on all the available packages and ensure the universal availability of GI content in Malta.

The MCA reserves the right to review must-carry obligations on a pay TV network operator should significant developments in technology and/or market take place.

¹⁵ Undertakings authorised in accordance with the Electronic Communications Network and Services (General) Regulations to provide electronic communications networks used for the distribution of TV & Radio Distribution Services:

<http://www.mca.org.mt/authorisations-licensing/register-authorized-undertakings>

5. REQUEST FOR COMMENTS

The MCA would like to seek the views and comments from interested parties on the review of TV broadcast networks subject to must-carry obligations.

Respondents should clearly link each view or comment to the relevant section. Any proposed amendments or revisions should be clearly explained and supported by respondents. Supporting material may be placed in an annex.

All views and comments should be submitted in writing in electronic format (such as Microsoft Word or PDF Format). Respondents are required to include their personal or company particulars, correspondence address, contact number and email address in their submissions.

The Authority appreciates that respondents may provide confidential information in their feedback to this consultation document. This information is to be included in a separate annex and should be clearly marked as confidential. Respondents are also requested to state the reasons why the information should be treated as confidential. The Authority will take the necessary steps to protect the confidentiality of all such material as soon as it is received at the MCA offices in accordance with the MCA's confidentiality guidelines and procedures.¹⁶

Respondents are, however, encouraged to avoid confidential markings wherever possible. For the sake of openness and transparency, the MCA will publish a list of all respondents to this consultation.

The MCA will, after taking into consideration the responses received to this consultation, issue its decision with respect to those TV networks subject to must-carry obligations.

All responses to this consultation should be clearly marked "**Review of Must Carry Obligations**" and sent, by not later than **8th August 2016** to the:

Chief, Policy and Planning
Malta Communications Authority
Valletta Waterfront
Floriana FRN1913
Malta

Email: info@mca.org.mt

¹⁶ In accordance with the MCA's confidentiality guidelines and procedures:

http://www.mca.org.mt/sites/default/files/articles/confidentialityguidelinesFINAL_0.pdf