

Ministry of Transport and Communications  
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Information Society Code

Dear Sirs,

FOX International Channels (FIC) welcomes the opportunity to comment on the above-mentioned Code.

After taking the opportunity to review the Information Society Code in detail, FIC would like to address the following issues related to the Code. Being solely a TV-broadcasting company, FIC will limit its comments to television broadcasting only.

The proposed Code contains many elements which FIC believes will positively impact the development of the Finnish TV-market, including:

- The Code's goal to increase and strengthen the quality and diversity of TV programming in Finland

In FIC's view, this is especially important for the public interest channels, which will continue to be the most viewed Finnish channels for the foreseeable future. FIC believes that the diversity of TV programming should be evaluated broadly to include not just specific programme content and the amount of independent production featured, but also the diversity of voices within the public interest channels, so that a few players cannot unduly influence programming and the content available to Finnish viewers

- The suggested framework for determining channel numbering.

In FIC's view, the government's role in allocating television channel numbers among the incumbent broadcasters should, as the Code suggests, be defined as specifically as possible. The industry should in the first instance have the ability to self-regulate channel numbering. It is vital however, that government regulators should have the authority and a clear framework to decide channel numbering if the industry cannot reach agreement.

FIC supports the Code's statement that public interest channels should take precedence in channel numbering over other free to air channels and pay-TV channels. FIC believes a straightforward system of numbering - where public interest channels come first, followed by other free to air channels and then pay-TV channels - would best address Finnish viewers' interest levels, and the relative breadth of programming and the license requirements of each category of channels. We would strongly support the explicit inclusion of this structure in the final legislation in order to provide the industry and government regulators with a clear framework for determining channel numbers.

FIC appreciates the opportunity to comment on the Information Society Code.