



MUSIC PUBLISHERS ASSOCIATION

**RESPONSE TO RICHARD HOOPER'S DIGITAL
COPYRIGHT EXCHANGE FEASIBILITY STUDY &
CALL FOR EVIDENCE**

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**MUSIC PUBLISHERS ASSOCIATION: RESPONSE TO RICHARD HOOPER'S
DIGITAL COPYRIGHT EXCHANGE ("DCE") FEASIBILITY STUDY & CALL FOR EVIDENCE**

EXECUTIVE SUMMARY

Set out in the pages below we tackle in detail the numbered elements of The Hargreaves Hypothesis. The essential themes of our response are as follows:

Music publishers are in the business of making their music available. Indeed, in the words of one of our members, "publishers are crying out to get their music used". For the most part this is a matter of licensing rights to third parties. As such, publishers are wholly dependent upon efficient licensing and a strong copyright environment.

The music publishing industry has responded to the needs of new digital businesses with a number of flexible and innovative licensing schemes to suit every different type of service. Over 300 digital services in Europe, offering music on a commercial basis in a plethora of formats, have been licensed by our industry. Further deals are being negotiated on a daily basis for the use of music online in myriad ways.

We do not consider the cost of music rights to be too high. Creators must be fairly compensated for their work, and publishers must be able to maintain the very significant level of investments made in the creation of new works.

We do agree that there are efficiencies to be gained in the processing of rights and we support efforts to reduce costs in this area.

One simplification to the licensing process would be the rewiring of the availability of content from creator/publisher to rights user, by giving publishers (and their mandated collection societies where appropriate) the ability to grant direct and multi-territory licences for the entire bundle of rights – including their performance rights and mechanical rights.

Availability and integrity of data are key issues. The DCE can play a role in providing users with better sign-posting of rights ownership data. The adoption of data exchange standards must be encouraged. We detail below initiatives already being taken in this regard, most notably the Global Repertoire Database ("GRD") project.

Collective rights managers must improve data standards, reduce duplication and pursue collaborative working, to drive greater efficiency and transparency into the network.

In support of these efforts, **Government must ensure effective measures are in place to tackle online copyright infringement both nationally and internationally,** including the implementation of the Digital Economy Act ("DEA"). Such measures must be accompanied by effective education, working jointly with industry.

PART 1: BACKGROUND INFORMATION

ABOUT THE MPA

The Music Publishers Association (“MPA”) is the trade association for music publishers in the UK, with over 270 members, representing nearly 4,000 catalogues covering every genre of music. Our members include all four of the UK’s “major” music publishers, independent pop publishers, classical publishers, production music publishers and also printed music publishers. We estimate that our members represent around 95% of publishing activity in the UK.

The vast majority of our member companies are small or medium sized enterprises. Many of our member companies are multi-disciplinary music companies, operating not just as music publishers but as record labels, managers, promoters, producers, manufacturers, distributors and retailers.

The MPA is the owner of the Mechanical Copyright Protection Society (MCPS), which is in alliance with the Performing Right Society under the PRS for Music banner. We have contributed to and fully endorse the PRS for Music submission.

We shall refer to our collection society hereafter as “PRS for Music” and where we are referring to collection societies more generically we shall refer to “CRM” (Collective Rights Manager), being the term favoured by the European Commission.

The MPA is a member of UK Music. We have contributed to and fully endorse the UK Music submission.

MUSIC PUBLISHING INDUSTRY

As music publishers we are in the business of making our music available. Whilst the music publishing industry invests heavily in and supports the creation of new copyright works, we are not manufacturers. We are licensors of rights and we are wholly dependent on efficient licensing and a strong copyright environment for survival.

The history of music publishing has been one of adaptation to technological development, and at each stage the music publishers’ response has been to find new ways to license new technologies. The advent of broadcasting in the 1920s gave rise to public broadcast performance licensing. The invention of the phonogram and the birth of the recording industry gave rise to mechanical licensing, the manufacturer of a record paying a fee to the publisher for the use of the works included. The first talking pictures gave rise to synchronisation licensing, whenever a copyright work is employed alongside moving images. The advent of the digital age saw these principles extended to take account of the myriad ways in which copyright music is communicated to and made available online through online licensing agreements.

The music publishing business in the UK is worth in the region of £700m¹. Against a difficult economic backdrop, and an evolving industry ecosystem, music publishing grew 8.7% between 2008 and 2010¹.

¹ Source: MPA survey of members and PRS for Music calculation 2010 (latest available figures)

Growth in the sector has been made possible as music publishers have developed a wide variety of revenue streams. Publishers have been particularly successful in the area of direct licensing. UK music publishing revenues from direct licensing – primarily synchronisation licensing but also including the licensing of Grand Rights, lyrics and print – grew by 16% between 2008 and 2010¹. In 2010, roughly 20% of a UK music publisher's income was derived from direct licensing and 80% from collection society or indirect income.

The UK music publishing industry is also successful overseas and in 2010, PRS for Music reported overseas royalty income for UK publishers and songwriters of £169.8m².

Music publishing is not simply a matter of administering and exploiting copyrights – the publisher is integral to the creation of new copyright works, and financial investments in songwriting and composing talent by music publishers are very substantial. In 2010, our industry invested £112m³. This comprises not only A&R investment and the advances paid to sign new writers, but publishers also provide financial support in a variety of other areas – promotion of live showcases, studio time, production of recordings and the manufacture of performance materials (printed scores & parts). The total amount invested by UK music publishers has grown by 33% between 2008 and 2010.

These levels of growth and investment, which enable our members to create the next generation of successful UK writers, are only sustainable if underpinned by a robust and stable copyright regime.

MODELS FOR LICENSING IN THE MUSIC PUBLISHING INDUSTRY

Music publishers derive the majority of their income from licensing (the balance comes from the sale and hire of printed music). Licensing can be split into two distinct areas: **direct licensing** and **indirect licensing**.

Direct licensing is carried out by the music publisher, or their sub-publisher in a foreign territory. This can be broadly summarised as follows:

- Synchronisation of music with audio visual (films, video games & commercials).
- The licensing of lyrics (websites, merchandising).
- The licensing of the right to arrange or adapt a musical work, thereby enabling the creation of a new work.
- The licensing of 'Grand Rights', in for example an Opera or Ballet.

In addition, music publishers are also involved in the creation, production, distribution and sale of printed sheet music, both on and offline in a variety of formats. An important market for our print publishers is the educational market where members are continually developing new products for learning and performance in schools. The retail value of the UK music print market was in the region of £100m in 2011.

Classical publishers also hire out their performance materials for use by, for example, orchestras and other ensembles.

² PRS for Music Annual Report 2010

³ Source: MPA survey of members and PRS for Music calculation 2010 (latest available figures)

Indirect licensing is licensing carried out on behalf of publishers (and their composers) by the CRM. The CRM is mandated to carry out functions on behalf of the collective of composers and publishers that they could not practically perform themselves. From the point of view of a user and customer who uses music in their business (e.g. a concert hall) obtaining a public performance licence accessing the world repertoire of music by way of a single licence makes eminent sense.

In the UK publishers will normally appoint MCPS as their agent to administer their “mechanical” (reproduction/copying rights) e.g. to grant a licence to a record label for permission to record and copy music.

For the “performing” right the composer and publisher will normally appoint the PRS. The performing right covers not only the right to perform a work in public in the normal sense but also includes the right to communicate the work to the public and this latter expression includes both broadcasting and the so called “internet right” i.e. to grant online rights. As a condition of membership, the PRS requires the exclusive and non-negotiable assignment, by the composer and the publisher, of the performing right in their works for the world.

In the online environment, a music service provider wishing to provide a music service (download, streaming etc), will need to clear both the mechanical right and the performing right.

It follows from the above that music publishers, although they have flexibility as regards the mechanical right, are, nevertheless, not able to license online uses without the involvement of PRS as they control the performing right.

The 2005 European Commission Recommendation on collective cross border rights management in effect exhorted rights owners (both publishers and CRMs) to be more flexible and multi territorial in their licensing approach. This has been effective, at least as regards the Anglo American Repertoire, in launching a Pan European market. As a result, since 2005 we have seen the rapid development and roll out of pan-European online licensing of music put in place by publishers, working in partnership with CRMs. This is good news and CRMs have responded to the challenge and market forces and PRS have been particularly innovative.

Publishers and CRMs working together to license the major music services is absolutely right. However, what we have to try and accommodate is the lower level licensing activity carried out by publishers whereby the mechanical right can be granted at the same time as the performing right.

PART 2: MPA RESPONSE TO THE QUESTIONS OUTLINED IN THE DCE FEASIBILITY STUDY

The Hargreaves Hypothesis: “Copyright licensing, involving rights owners, rights managers, rights users and end users across the different media types, in the three defined copyright markets, is not fit for purpose in the digital age.”

1. Expensive:

We do not consider the cost of rights to be expensive, but we do acknowledge that there are further efficiencies and cost savings to be made in the processing of those rights. As such we support measures to achieve this goal.

Licensing process:

The process of licensing normally involves a transaction between a publisher (or a CRM on its behalf) and a rights user i.e. primarily business-to-business rather than business to consumer. For example:

- An advertising agency may wish to use a particular piece of music as part of an advertisement. The publisher and the agency will negotiate terms, which will vary case by case – e.g. depending on the commercial success of the music, the territory, the term, and length of use. The publisher will normally seek the approval of the songwriter to the proposed use. This process may be time and labour intensive because of the defined nature of the transaction.
- An SME wants to set up a UK on line music service specialising in world music. The SME will hopefully build into his business plan the cost of a music licence to be obtained from PRS for Music. As the PRS for Music submission explains, the SME has a range of options e.g. it might be appropriate to apply via the PRS for Music website for a LOML (Limited Online Music Licence).

The process is very manageable where the business focus is the UK. The international picture is more complicated as explained later.

Cost of rights:

Music publishers operate in a competitive market and negotiated licences are subject to normal market forces. An entrepreneur who sets up a business built upon delivering music should not be surprised that one of the cost lines will be that of paying for the music. It is a crude deception and self-delusion that a business plan has been torpedoed by the cost of rights alone. It is a truth universally acknowledged that not every entrepreneur will survive and this Darwinian process will be determined by a variety of factors: sufficiency of investment (and British banks continue to be castigated for their failure to lend to SMEs), strategy, partnerships, choice of business model, cost saving, competing with free, uncertainty of copyright legislation and enforcement and Government bureaucracy.

In the UK, the cost of rights administered by PRS for Music is subject to scrutiny by the Copyright Tribunal, and details of such costs are publicly available on the PRS for Music website.

It is the duty of a publisher (and the CRM) to maximise the value of the rights that they administer to return value to songwriters and composers and to enable them to invest in the writers and composers of the future.

2. Difficult to use / 3. Difficult to access/ 4. Insufficiently transparent:

Publishers are in the service business – responsible to their writers and to users of their writers' music. We are guided by the following considerations:

- First and foremost the imperative is to license wherever demand exists, either directly or through the CRM.
- Publishers are mindful that each musical work is an exclusive and unique creation and that it may be appropriate to control its use where its value is not being recognised or is at risk – e.g. by asserting the moral right to stop derogatory use or to restrain use by a music service that has not obtained permission.
- Publishers compete to some extent on the standard of service they provide to potential music users. This means that where a specific use is requested, for example in synchronisation or sample licensing, the publisher will deal with that request on its merits and in a timely manner.
- Publishers work hard to establish new and simpler ways of doing business for the benefit of both rights owners and rights users. For example, the response of UK music publishers to the burgeoning digital market by offering licensing solutions – whether for a la carte downloads, subscription streaming services, cloud services or the range of other business models presented to us. Another area we have identified is the education sector. This sector is very important to our members. Later this year, we will be introducing a reprographic licensing scheme, which will allow photocopying of music material and the making of arrangements in schools.
- Introducing a GRD, is another way in which music publishers, CRMs and music service providers are working hard to improve the structural issues facing the industry and facilitate better licensing solutions for rights users.

During our meeting with Richard Hooper, we identified three structural problems regarding the present licensing environment:

i. Data – getting the rights picture clear:

- The GRD project, commenced in 2008, brings together publishers, CRMs and music service providers who have agreed that it is essential for the growth of the digital market that there should be a single comprehensive and authoritative source of data on which parties can rely to ensure the correct rights have been granted and that royalty payments are accurately claimed and directed to the correct recipients.
- At the present time, for example, there are across Europe 26 databases administered by 26 different CRMs. The vision for the GRD is that there should be one definitive source.
- We believe that this project is crucial. We are coming to the end of the first phase of the project - the scoping and stakeholder consultation. The remaining three phases are the design, implementation and the roll out.

ii. The expense of processing:

- Identifying, matching, invoicing and accounting for billions of transactions is a mammoth and expensive task so it is essential that any interoperable complexity be reduced as much as possible and whatever tools are used should be standardised.
- Managing metadata efficiently (and indeed hiding complexity from users) is one of the great challenges that faces our industry and the creative industries in general. We take the view and vision that standards harmonisation, interoperability, globalisation, and data transparency are key goals. We see the GRD as a fundamental part of the vision. Additionally we support the development of standards by the DDEX (Digital

Data Exchange) group that will bring about the automated exchange of information along the digital supply chain e.g. enabling publishers, record labels and digital service providers to exchange data instantaneously.

- We believe that there should be no limit in theory or in practice to widening the view and vision across all media and in this respect we support the aims of the Linked Content Coalition.

iii. **Transparency:**

Music publishers are fully supportive of transparency in all areas of our business. However, in our meeting with Richard Hooper, we raised the following two concerns:

- Foreign CRMs – Whereas we consider that PRS for Music is transparent as to its governance, licensing and distribution policies, many foreign CRMs fall woefully short of what is morally and commercially acceptable. The bottom line is that monies otherwise due to UK publishers and songwriters are not being received. We await with interest the Framework Directive to be published later this year by the European Commission relating to collective rights management.
- Whereas we accept that competition law requires that some information be held confidentially, many digital service providers impose, as a condition of agreement, the most stringent of NDAs upon PRS for Music. This engenders distrust amongst PRS for Music members towards both the service and the society.

5. **Siloed with individual media types (at a time when more and more digital content is mixed media and cross media):**

Yes, we agree that individual media types are siloed at the moment. We believe that a uniform and cross-media approach to signposting at the front end (for new rights users) would simplify the process of accessing rights. The back end, however, is likely to remain siloed by industry given the very specific nature of the rights and ownership data for each media business.

6. **Victim to a misalignment of incentives between rights owners, rights managers, rights users and end users:**

A recent report from Sweden reports that the rise of Spotify has coincided with a 25 percent drop in the use of unlicensed alternatives over the past two years⁴. A significant reduction in unlicensed music consumption will remove this market distortion to the shared benefit of all those who have a legitimate interest in the digital marketplace, including rights owners, music services and end users.

The misalignment of incentives here is not necessarily between rights owners and digital music services, but rather between rights owners and music services on the one hand, and the internet service providers (“ISPs”) and search engines on the other. Often digital music entrepreneurs are dependent on ISPs to bundle their services in order for them to be successful, and on search engines to direct users to licensed content. In the absence of any obligation or incentive for ISPs or search engines to promote legitimate services above unlicensed alternatives the odds are stacked against those businesses trying to provide legal access to music.

⁴ Media Vision: Musik Sverige Svenskarnas Internet Van Or Q2 2011 (<http://www.scribd.com/doc/66658516/Musik Sverige-Svenskarnas-Internet-Van-Or-Q2-2011>)

7. Insufficiently international in focus and shape:

During our meeting with Richard Hooper on 1 February, we passed on a piece of work prepared by the “Bilbao Group⁵”. Entitled ‘Online Music in Europe’, it comprises the following three documents: (A digital copy is available on request).

- The Truth about Music Licensing in Europe
- The Online Music Market in Europe – New Business Models and Consumer Choice
- Impact of Piracy on Cultural Diversity in Europe

In an ideal licensing world a music publisher would wish to grant a multi-territory licence for online exploitation which would include both the mechanical and the performing right. At the present time, however, as regards the Anglo-American repertoire controlled by our members, the performing right is controlled by and assigned to PRS for the world and therefore they have to be involved in the granting of any such online licence. As regards the mechanical right, whilst the overwhelming majority of publishers elect to appoint MCPS as their agent in the UK, the portability of the mechanical right gives publishers the ability to license directly. As such, a simplification to the licensing process would be giving publishers (and their mandated collection societies where appropriate) the ability to grant direct and multi-territory licences for the entire bundle of rights – including both their performance rights and mechanical rights.

UK publishers have been particularly active in building the European digital market. A number of small to medium sized MPA members have come together to form IMPEL (Independent Music Publishers’ European Licensing) and have empowered PRS for Music to grant pan-European licences on their behalf. This has not been straight forward as it has necessitated not only withdrawing rights from their sub-publishers in the respective territories, but also from the local CRM which, in many cases, have been very slow in acceding to this instruction or very slow in accurately updating their database.

As an IMPEL member, Chair of the IMPEL Advisory Group, and MPA Board Member Stuart Hornall of Hornall Brothers Music has recently said: “IMPEL has removed the complexity of pan-European Licensing for independent publishers and greatly eased the administrative burden. The significant and increasingly important online monies we have received and that are in the pipeline is proof that IMPEL publishers are receiving their pan-European royalties more quickly and transparently. I’m confident this will increase further this year and beyond.”

For those digital music services operating in multiple territories the pan-European licensing solution provided by IMPEL, and by the platforms established by the major publishers, have offered greater flexibility and simplicity.

Many digital services do not necessarily want to set up, either at all or immediately, a pan-European service – for reasons that have nothing to do with rights clearance, but due to issues such as language, currency and advertising considerations. These considerations are particularly relevant when comparing the rollout of digital

⁵ The Group comprises representatives from the music publishing and recorded music industry and European representatives of CRMs.

services in the USA to Europe which the European Commission is often wont to do. There are currently over 300 licensed digital services with a music offering in Europe, and just 20 such licensed services in the US market.

Copyright protection is nationally rooted save for the application of certain overriding international treaties and conventions. In some cases poor copyright protection and enforcement can be a barrier to international business. Ideally in the EU there should be sufficient harmonisation to ensure a functioning market place – in this context we welcomed the Term directive which harmonised the protection of co-written works.

8. The size of the pie for rights owners is smaller than it could be:

Yes we would agree. Whilst the size of the pie is likely to grow with the launch of new legitimate services, we are concerned that in the UK 76%⁶ of music accessed online is illegal. We would like to see greater progress in this area through:

- Engagement by the Government to roll out the DEA.
- Engagement with the ISPs and search engines (with exhortatory pressure from Government) to promote legitimacy on the net and optimise the legal and relegate the illegal.
- Working across industry and Government to step up educational messaging about copyright.

The copyright exceptions currently being proposed by Her Majesty's Government, will serve further to reduce the size of the pie. Of particular concern is a broad exception for private copying, which would most likely exclude the music industry from licensing into the rapidly evolving area of cloud services. Furthermore it must be recognised that if cloud services can rely on copyright exceptions to operate then other, apparently unrelated, licensed services such as Spotify will find it harder to find paying subscribers. These services may look different but are both supplying ubiquity of music.

Where there are holes in the licensing blanket we must seek to find flexible and pragmatic solutions. The MPA's proposed schools reprographic scheme (as referred to above) is just such an example.

9. The share of the pie going to rights owners is smaller than it could be:

Yes, we would agree. In many digital services, the music publisher receives just a small fraction of the cost to the end user. For example, from an iTunes download, the licensing of musical works accounts for just 8% of the retail price.

CRMs also need to become more efficient. In Europe we have 26 independently operating collection societies and we look forward to the implementation of the EU Framework Directive which we hope will make this existing infrastructure more efficient and improve the flow of royalties back to rights owners and creators.

We have no doubt that the UK publisher's/writer's share of the pie will get larger with the implementation of the GRD.

⁶ *Harris Interactive – Dec 2010*

10. The digital businesses within the creative industries are being held back:

A number of the well known and dominant new media businesses have highly successful business models based upon the use or distribution of licensed music and other copyright content.

The music publishing industry has responded to the needs of new digital businesses with a number of flexible and innovative licensing schemes, and we now have over 300 licensed digital services in Europe. Notwithstanding that there are some problems surrounding the implementation of licences, the main commercial problem reported by our members when dealing with digital start-ups has been around the cost of licensing rights, rather than the process. Digital businesses, from small to very large, all need to recognise the value of music to their business, its cultural importance and the cost of bringing it to market.

It should also be noted that many of our members would class themselves as digital businesses, active and expert in the online world. (See Faber Music example below).

11. Innovation is being held back:

Music publishers are keen to get involved with new services as early as possible and are able to offer a wide variety of both direct and indirect licensing solutions. Music publishers have worked hard with PRS for Music to provide flexible solutions for indirect licensing – please see the PRS for Music submission for further detail.

In the area of direct licensing, music publishers are particularly keen to participate in new areas of innovation. One example, from Faber Music, is described below:

Faber Music: A mini digital copyright exchange in action

Sarah Holcroft, Head of Digital Operations, Faber Music: “If you do an internet search for sheet music, you find thousands of guitar tab arrangements that have been uploaded by guitarists who don't realise that they do not have permission to do this. Some of the largest sites hosting this activity boast millions of users and attract substantial levels of advertising money. They have proved impossible to close down.”

Unsurprisingly, this environment led rights holders to be supremely cautious in granting online print licences of any sort, including to legitimate start up web businesses. The uncontrolled, illegal use of copyright music also led to a proliferation of poor quality arrangements online. Now Faber has pioneered a scheme which enables people to make arrangements and sell them online legally. Using its industry connections, Faber approached all the major and large independent publishers and negotiated a single system through which all of these companies could make their writers' works available to sheet music arrangers online. It's called the “Epartners” scheme (www.fabermusic.com/e-partners.aspx).

Sarah Holcroft: “The scheme offers rights clearance, royalty payment, web creation and ecommerce services to arrangers and businesses who want to develop a world class, legitimate online sheet music offering. The hub, created and controlled by us, hosts all of the content and delivers the files to the end customer. ‘Epartners’ can resell their arrangements

not only through their own site but those of any other participant in the scheme, including Faber's own. We handle all of the royalties and transactions, so that small companies and start ups don't have to worry about it – they simply get the income from their work.”

The scheme has found favour with music publishers. The moral rights of writers are always reserved; Faber guarantees to take down arrangements within 24 hours at the writers'/licensors' request. Customers are told that they are buying approved material, and that the songwriter will receive a royalty payment. Faber monitors all content on behalf of the writer/licensor, to make sure that the arrangements are of a professional quality and are good representations of the original work by the creator of the song. This feeds confidence, being industry-led by businesses which understand all of the issues at play.

There are now over 30 Epartners selling sheet music online through the scheme, ranging from individual artists and bands such as Muse, Queen and Elbow and established brands such as Classic FM and Chappells of Bond Street, to genre specialists creating arrangements for brass band and string ensembles.

12. Infringement of copyright remains persistent:

Infringement of copyright has always existed and is likely to persist. Businesses affected include not just rights owners but also those entrepreneurs and start-ups attempting to establish a presence in the digital marketplace.

As we have mentioned above, we believe that in order to reduce the level of copyright infringement the industry requires:

- Engagement by the Government to roll out the DEA.
- Engagement with the ISPs and search engines (with exhortatory pressure from Government) to promote legitimacy on the net and optimise the legal and relegate the illegal.
- Working across industry and Government to step up educational messaging about copyright.

13. The end user is deprived of access to a significant amount of commercially and culturally valuable content e.g. archive material:

As publishers we want as wide an audience as possible to have access to our material – we are not in the business of denying access, but we do need value for this content. Licensing is a very effective way of ensuring both the distribution of content and financial reward for it.

What needs to be taken into account is the often massive set up costs to digitize, for example, a printed music or a recorded sound archive. The owners of such archives need to balance the sheer cost of doing so with likely revenues: if costs are high and revenues are projected to be small, it is that 'unbalanced equation' that is likely to be preventing the access, not the licensing models or copyright rules per se.

14. UK GDP should grow by an extra £2bn per year by 2020, if barriers in the digital copyright market were reduced:

We are bemused by this assertion and would be intrigued to know the provenance of this figure.

Furthermore, we feel that Her Majesty's Government's "Consultation on Copyright" proposes a number of copyright exceptions which would undermine the very 'raison d'être' for a DCE:

- Exception for private copying – will threaten the valuable existing licences we have currently negotiated with cloud service providers, and threaten future licensing activity in this rapidly developing area.
- Exception for parody – this would directly reduce synchronisation income for music publishers and undermine the moral rights of our creators.
- Exception for education – this would damage the sales of printed music for educational use and rule out the ability of music publishers to license into schools.

Greater enforcement of the DEA and curbing copyright infringement would also potentially deliver the conditions necessary to sustain a great number of successful new business models.

PART 2: DEFINITIONS

Please refer to UK Music and PRS for Music submissions.

Chris Butler
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Stephen Navin
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