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File: Public Performance of Musical Works 1996-2006

SOCAN TARIFF 22

**COMMUNICATIONS OF MUSICAL WORKS VIA THE INTERNET OR
SIMILAR TRANSMISSION FACILITIES**

PHASE II

**STATEMENT OF CASE
OF
CANADIAN ASSOCIATION OF BROADCASTERS**

MCMILLAN BINCH MENDELSON LLP
BCE Place, Suite 4400
Bay Wellington Tower
181 Bay Street
Toronto, ON, Canada M5J 2T3

David Kent
Tel: 416.865.7143
Fax: 416.865.7048
email: david.kent@mcmbm.com

Counsel for CAB

1. INTRODUCTION

This is the Statement of Case of the Canadian Association of Broadcasters (“CAB”) with respect to the proceedings of the Copyright Board (the “Board”) concerning Phase II of SOCAN’s proposed Tariff 22 for the years 1996-2006 (the “Tariff”). The Tariff is to apply to the communication of musical works (or parts of musical works) by means of Internet transmissions or similar transmission facilities.¹

The CAB’s members include radio broadcasters (sometimes referred to as radio stations) and television broadcasters and pay and specialty programming undertakings (sometimes collectively referred to as television stations). The CAB’s case focuses on the Internet websites operated by radio and television stations. To the extent these websites communicate music, they do so primarily by streaming rather than downloading.² Accordingly, the CAB’s evidence and submissions deal with music streaming and the manner in which Tariff 22 should apply to such activity. The CAB does not generally address downloads in these submissions and will rely on the evidence and submission of other participants in this regard.³

SOCAN has broken Tariff 22 into seven categories, some of which are further divided into subcategories.⁴ A number deal with streaming. The CAB will address, in particular, SOCAN items 2(b) [audio content similar to radio], 3(a) [simulcasts of conventional radio signals], 4 [audiovisual content similar to television or pay and specialty services] and 5 [simulcasts of conventional television or pay and specialty signals].

The CAB is proposing specific royalty rates and structures for each of the Tariff items listed above. These proposals are fair, reasonable, and rooted in prior Board decisions and decades of dealings between the parties. They are also consistent with the manner radio and

¹ This application of the Tariff is taken from Tariff 22 as filed for 2006. See Exhibit SOCAN-2

² For these purposes, streaming describes the transmission of music over the Internet that is meant to be heard by the recipient at essentially the time of transmission and which is not intended to be reproduced or saved by the recipient except temporarily, as may be required for the purposes of transmission and playback. Downloads, for these purposes, refer to transmissions of music files meant to be reproduced and saved by the recipient for subsequent (and possibly repeated) playback.

³ The CAB will deal with podcasts, which are or are similar to downloaded clips from radio or television signals, but will propose that they be dealt with in the same manner as streamed audio or audiovisual content.

⁴ See SOCAN Case, para. 18.

television station websites actually operate, together with the way and extent to which music is actually used in and contributes to those operations. SOCAN, for its part, has proposed royalty rates and structures for the Tariff items listed above that are based on fundamental misunderstandings of how radio and television station websites operate, misconceptions as to how music contributes to those operations, and deeply flawed economic analysis. SOCAN's proposed approach is incapable of leading to an appropriate royalty.

2. BACKGROUND - RADIO AND TELEVISION WEBSITES

SOCAN's Statement of Case and related evidence demonstrate an incomplete and simplistic understanding of the manner in which radio and television stations operate websites and the degree to which SOCAN's music contributes to those operations. The CAB will lead evidence from a number of witnesses in order to provide the Board with a more complete, and more accurate, understanding of the nature and content of these websites.

(a) Broadcaster Evidence

The CAB will lead evidence from two panels of witnesses who will describe websites operated by radio and television stations respectively. These witnesses will provide information about, and insight into, the business and content of radio and television websites together with the interplay between the stations' Internet and conventional activities. For example:

- The Internet is a non-linear medium, different from the linear nature of the conventional broadcast sphere. This both necessitates and facilitates the creation and use of text-based original content that contains no music;
- Perceived key areas of audience interest and concurrent revenue on multi-faceted websites are not the simulcasts or even other audio or audio/visual options which may contain music, but rather interactive elements, games, contests, news, weather, sports, etc.;
- Advertising on broadcaster websites is generally sold across the whole site and not tied to specific content;

- For the vast majority of broadcasters, the website is seen as an extension of their conventional operation and is operated to retain their listener or viewer base rather than to derive independent revenues;
- Simulcast listeners are not segregated for measurement purposes from radio listeners. Advertising found within the simulcast stream is paid for by advertisers within the context of the purchase of broadcast advertising time and already generates royalties to SOCAN under Tariff 1A,;
- Unlike for conventional radio or television broadcasting, some significant costs (eg. bandwidth) are variable and not fixed (eg. transmitters);

(b) Website Data and Metrics – Solutions Research Group

The CAB retained Solutions Research Group (“SRG”) to provide expert evidence regarding the use and content of broadcaster websites. SRG was engaged because of shortcomings in the ERIN Report filed by SOCAN⁵ and because of a critical absence of information in SOCAN’s case about where website visitors actually go, the extent and nature of music and non-music content available, and the degree to which music is actually consumed on radio and television websites. The SRG Report is attached as Exhibit CAB-4.

Jeff Vidler will testify for SRG. He will note that SRG examined essentially the same sample of broadcaster websites reviewed by ERIN.

For radio websites he will explain that, among other things:

- Most radio stations have websites, and most of those host audio content containing music. About three-quarters of radio websites offer continuous streaming of the station’s broadcast channel.
- All radio websites also offer non-audio content, and most offer such content across a wide range of content categories.

⁵ Exhibit SOCAN-5.

- Most radio website visits are to portions of the sites that offer no music streaming at all. At most, fewer than 30% of all page views constitute streaming sessions (whether for simulcasts or other audio content). Radio signal simulcast streaming accounts for about 1.1% of all listening to conventional radio signals.
- Average monthly radio website revenue was about \$3,500 as of November 2006.

For television websites he will explain that, among other things:

- All television stations have websites. Most contain audio or audiovisual content, though few offer content in which music plays a predominant role. Only one offered continuous streaming of its conventional signal, and that outlet streamed only the audio component.
- All television websites also offer non-audio content, and most offer such content across a wide range of content categories
- Almost all television website visits are to portions of the sites that offer no music streaming at all. At most, only about 1.3% of all page views constitute streaming sessions (whether for simulcasts or other audiovisual content). There is little simulcasting, and simulcast sessions average only about four minutes each.
- Average monthly television website revenue was about \$60,000 as of November 2006, but was driven by six (of 41) websites that reported monthly revenues of over \$100,000.

(c) Advertisers

Advertisers provide the revenue for which SOCAN claims some credit and to which SOCAN seeks to apply Tariff 22. CAB commissioned Jeff Osborne to provide expert analysis of online advertising as it relates to website content and, in particular, music content. He is President of OzWorks, a marketing consultancy created to help marketers enhance their marketing communications return on investment. Mr. Osborne was also President and CEO of

ComQUEST Research, the custom research subsidiary of BBM Canada. He will present his report (Exhibit CAB-5) and will explain that, among other things:

- Advertisers quantitatively measure (and pay for) the audience to their advertisements by “impressions” (opportunities to see), “clicks” (user-initiated actions or responses) and “reach” (unduplicated or unique viewers).
- Advertisers measure the effectiveness of Internet advertising by cost-per-lead or cost-per-order or similar measures.
- Advertisers usually pay for advertisements at a price per thousand impressions or clicks. They are indifferent to the website content connected to an impression or click unless that content suggests a viewer more likely than average to fit a demographic more likely than average to be interested in the advertisers’ product or services.
- Music content may provide viewers more likely than average to be interested in products and services related to music; however, this is one of the smaller advertising expenditure categories. Music may also, more generally, produce viewers more likely to reflect the youth market; however, music content delivery is highly fragmented across many websites and thus the presence of music does not materially enhance what would otherwise be the value of the impressions or clicks.

3. THE APPROPRIATE ROYALTIES

(a) Economic Principles

The CAB also commissioned an expert economics opinion that takes account of the information available from the CAB’s witnesses (as well as the evidence filed by SOCAN) to propose appropriate royalties for the Tariff 22 items with which the CAB is dealing. Professor Frank Mathewson, of the University of Toronto and Charles River Associates International, has prepared a report (Exhibit CAB-6) that discusses appropriate approaches to tariff setting in these circumstances and applies those approaches to the available information.

Some of the key findings from Professor Mathewson's report are:

- The proxy or benchmark for commercial radio station websites is the effective rate payable under SOCAN Tariff 1A (the "Radio Rate").⁶
- The proxy or benchmark for commercial television station websites are the rates payable under SOCAN Tariff 17 (the "Television Rate").⁷
- The revenues from advertisements embedded in the conventional radio or television signals that are simulcast over the Internet should attract SOCAN royalties in the same way as under Tariffs 1A, 2A or 17.
- The royalties on website-only revenue in respect of streamed musical audio or audiovisual content, whether simulcasts or not, should be paid on those revenues actually attributable to that content ("Relevant Website Revenues").
- Alternatively, where Relevant Website Revenues cannot be identified or allocated, a royalty may be paid on all website-only revenue but subject to a reduction to reflect the diminished role of music in generating website-wide revenues.

(b) The CAB's Proposed Royalty Approach

The CAB proposes royalty rates for the Tariff 22 items which it addresses in accordance with the economic principles described by Professor Mathewson and consistent with the broadcaster and site visitor behaviour to be described by other witnesses and as evaluated by SRG. The CAB's proposals are designed to be fair, reasonable, and transparently consistent with the tariffs already applicable to the same or similar uses of SOCAN's repertoire. The CAB has taken the following considerations into account:

⁶ That rate is currently 4.2%, and less for low music broadcasters, subject to the scheduled rehearing into the Tariff 1A rate. Although the 4.2% rate will sometimes be referred to, the Radio Rate is meant to be whatever effective rates are eventually set after the rehearing.

⁷ That rate is 1.9% or 0.8% for low music use services. Conventional broadcasters do not have a low use rate under Tariff 2A. However, apart from any streaming of their conventional signals, there is no reason why they should be treated differently than pay and specialty stations with respect to streaming audiovisual content from their websites.

(a) Revenues from advertising in simulcast conventional signals should be excluded from Tariff 22 altogether, and instead should attract royalties under the tariffs applicable to the signals in their original form. This is consistent with how reproduction rights royalties are paid to CSI. It is also consistent with how broadcasters have actually calculated and paid royalties to SOCAN over the relevant period. Moreover, it reflects the fact that the Internet is just an additional delivery route to an undifferentiated (and unidentified) group of listeners and viewers. Audience measurement firms do not distinguish between signal listeners and viewers to a simulcast and over the air any more than they distinguish among those who consume signals in the house, at work or while in the car. There is no reason why the revenue generated in respect of advertising in the signal should be subject to a different rate when a listener in her office switches off her radio and switches on her computer.

(b) Websites are not monolithic, and (unlike radio and television signals) are not linear. They have many discrete pages, which contain segregated and very different content. A visitor need not move in a straight line in a website, but rather can skip among pages and can bypass home pages or other intermediate steps altogether. The data show that radio and television website visitors tend to visit pages with little or no streamed music. In these circumstances, it is important to ensure that the Tariff is applied only to the revenue actually attributable the use of SOCAN's music. This approach is consistent with the approach taken by ASCAP in the US. SOCAN's suggestion that all website revenue ought to form the base for the Tariff, and the implication that SOCAN's music plays a part in all website revenue, is contrary to all the facts and cannot be implemented as proposed.

(c) In order to reasonably determine Relevant Website Revenues, the CAB proposes that websites attribute all website-only revenues to Relevant Website Revenues in the same proportion that all website page views are to streaming sessions involving music. In other words, a website on which 25% of page views consist of such streaming requests would attribute 25% of its website-only revenues to Relevant Website Revenues.

(d) The CAB recognizes that, in some cases, website operators may not be able to adequately attribute the page views to streaming requests from web pages containing music. In these cases, as a practical matter, website revenues generally will have to form the tariff base. However, the royalty payable on this base must be reduced to compensate for the fact that the base is too large to the extent that it includes revenues from non-music activities (such as contests, articles, weather, chatrooms, weblogs, webcams, etc.). The average proportion that all website page views are to streaming sessions involving music on radio and television websites respectively should form the basis for this reduction. To address the possibility that websites featuring higher than average streaming sessions to website page views might be prone to select this option, CAB proposes using a reduction slightly smaller than what the SRG data would otherwise suggest.

(c) The CAB’s Proposed Royalties

Accordingly, the CAB proposes the following royalty arrangements under Tariff 22 for the Items that it addresses:

SOCAN Item	Content	Royalty Rate	Royalty Base
3(a), 5	Radio and television signal simulcasts (regarding revenue from ads imbedded in original signal)	Exclude from Tariff 22. Pay the royalties under the SOCAN tariff applicable to the signal (1A, 2A or 17)	Existing base under Tariffs 1A, 2A, or 17 as applicable
2(b)	All musical audio (like radio), including any website-only revenue associated with simulcasts	Radio Rate	Relevant Website Revenues
		Alternatively, Radio Rate on all website-only revenues, subject to 70% reduction	
4	All musical audiovisual (like television), including any website-only revenue associated with simulcasts	Television Rate	Relevant Website Revenues
		Alternatively, Television Rate on all website-only revenues, subject to 98.5% reduction	

(d) SOCAN's Proposals

SOCAN's proposals appear to be based on a superficial analysis of the workings of radio and television station websites. For example, the ERIN Report purports to examine the relationship between music use and revenue generation. However, with respect to radio and television station websites, ERIN is unable to do anything more than indicate that many of these websites include music and also generate revenue. ERIN is unable to match or relate revenue generation to music use in any way.⁸

This simplistic approach is repeated by SOCAN's Professor Liebowitz, who mistakenly assumed that all visitors to radio station websites actually stream and listen to radio simulcasts.⁹ In fact, only a small portion of radio website visitors visit and stream the simulcast radio signal. Professor Liebowitz over-estimates actual simulcast radio listening by 400%.

Thus, SOCAN's analysis starts from a series of false or unsupported assumptions. Professor Liebowitz then attempts a complex analysis designed to identify Internet profits and to divide them between SOCAN and radio and television stations. All apart from the fact that SOCAN's royalties are not properly set as a function of broadcaster profits, Professor Liebowitz's analysis is fraught with problems and is unusable. Key among these is the fact that he assumes that most radio expenditures are "sunk" in the original conventional radio signal and therefore irrelevant in considering website simulcasting profits. This is inconsistent with the reality that the Internet is just another means of reaching audiences for radio signals, and that Internet listeners are no different for business purposes than those who listen in cars, bathtubs or kitchens. From a policy perspective, it is inappropriate to balkanize revenues earned in a homogenous way from what is effectively a single use of music into artificial categories to which separate and different rates are applied.

More importantly, Professor Liebowitz treats each dollar of costs that he deems "saved" (because he has deemed them "irrelevant") to constitute pure profit. He has entirely forgotten to consider whether these cost reductions have been accompanied by revenue reductions. To the

⁸ See, generally, ERIN Report, Part 3, Exhibit SOCAN-5.

⁹ Liebowitz Report, Exhibit SOCAN-9, paras. 124 to 131 and related footnotes.

extent revenues drop in proportion to costs, there should be no incremental profits to divide and no change in the benchmark tariff rate. On Professor Liebowitz's own assumptions, revenues are actually far more reduced on the Internet than are costs. Given this, his approach necessarily generates a distorted and inflated royalty rate with no basis in economic theory.

4. OTHER ROYALTY ISSUES

(a) Podcasts

Podcasts can be radio or television programs or clips, usually taken from conventional radio or television signals, which may be downloaded by a consumer for reproduction and later listening or viewing. Many contain no music. Those that contain music use it in the manner of music use on conventional radio and television programming. Podcasting is not a substitute for purchasing a song or album by Internet download; podcasts are not the same as discrete music files.

The Tariff, as proposed, is insensitive to the well-known phenomenon of podcasting. Item 1A treats all downloads as being the same. It is neither reasonable nor fair for podcasts, which will typically have spoken word, visual and other non-music elements and which may use music only in the background, to be assessed for royalty purposes in the same manner as song downloads.

The CAB proposes that podcasts be treated in the same manner that the CAB has proposed above for audio and audiovisual streams. They represent content similar to the content of conventional radio, television or pay and specialty stations. They are far more ephemeral in nature than are downloaded (i.e., purchased) songs. In this context, the distinction between streamed and downloaded content is not material.

(b) Expense-Based Royalties

SOCAN has proposed that its royalty rates be based on revenues. So long as the revenues are properly defined, the CAB agrees. However, SOCAN seeks the right to apply its royalty rates to operating expenses instead whenever that would generate a higher payment. In other words, SOCAN seeks revenue participation whenever profits are positive, but seeks royalty protection by switching to a percentage of expenses if a website loses money.

This position is unprincipled, unprecedented and untenable. The Board only sets percentage of expense tariffs for users who, by design, do not directly generate revenues from their use of SOCAN's repertoire. Examples include free concerts [Tariff 4A(b)], non-commercial radio [Tariff 1B] and live music in clubs where no admission is charged [Tariff 3].

SOCAN justifies its approach by asserting that many websites have little or no revenue but nonetheless use significant amounts of SOCAN's music.¹⁰ This statement demonstrates the confusion in SOCAN's analysis. If websites are designed to generate no commercial return (like free concerts), the appropriate tariff might be one that is based on expenses. However, if the website has a commercial purpose and represents an attempt to earn revenue, SOCAN's return should be based on that revenue as are its returns on all similar uses of music. A commercial website that fails to generate significant revenue is a website within which music (and other inputs) has failed to attract much attention. In these circumstances, SOCAN should not be entitled to claim rewards for its contribution to revenues when revenues climb, but disclaim responsibility when revenues shrink. There is no other certified tariff under which SOCAN is entitled to switch to an expense base from a revenue base (and back) to ensure that it gets the best of both worlds.

(c) Double (and Triple) Dipping – Multiple Tariff Items

SOCAN states that, if a website contains simulcasts, "radio-like" audio and "television-like" audiovisual content, it will apply each of the Tariff items for each of those uses to *all* website revenues.¹¹ If such a site also offered music downloads, SOCAN would apply yet another royalty to overall site revenues.¹² This is both unreasonable and illogical.

It is self-evident that, where music is used in the context of more than one Tariff 22 category within a given website, each category cannot be responsible for all of the revenue on the website. Instead, at best, each can only be responsible for part of the revenues or, put another

¹⁰ SOCAN Statement of Case, p. 13, Exhibit SOCAN-1.

¹¹ SOCAN Response to Interrogatory 41

¹² See SOCAN Statement of Case, p. 8, Item 1A

way, each must be jointly responsible with the other for the whole. An approach that rewards each use category for all revenue can only over-reward SOCAN and be unfair to users.

The CAB's tariff proposal solves this problem. If revenue from embedded simulcasts advertising is dealt with under the tariff referable to the original broadcast, and if royalties for other musical audio and audiovisual content are paid only on the revenues associated with that content, then even the application of multiple tariff items to the same website will not result in overlapping royalty rates being paid on the same revenue dollars.

(d) MBL

In principle, the certified Tariff should provide website operators with an outcome akin to the Modified Blanket Licence option available under Tariff 2A (commercial television).

Nothing needs to be done to accomplish this objective if the Board accepts CAB's structural proposals and ensures that royalty rates are payable only on revenues attributed to streaming music use. This structure, like the MBL, ensures that SOCAN is paid for the use of its repertoire but is not rewarded for revenues that are not generated in association with its music. However, if the Board were to certify Tariff items based on unreduced website-wide revenues, there must be a mechanism along the lines of the MBL available to website operators who either clear the SOCAN rights in music or else use music for which a SOCAN licence is not required.

(e) Minimum Fees

SOCAN seeks minimum royalty fees of \$200 per month, or \$2,400 per year, for each of the Tariff items addressed by the CAB. This amount is inconsistent with the principles that apply to minimum fees, is out of line with other minima certified by the Board and distorts SOCAN's entitlement to royalty payments.

The Board has previously said that minimum fees are necessary to reflect the intrinsic minimum value of music and the SOCAN repertoire.¹³ However, it is important that minimum fees compensate only for minimum value and do not become a substitute for use-based royalty rewards.

The proposed \$2,400 annual minimum fee is completely out of line with other minimum fees certified by the Board. Many tariffs, including those for commercial radio and television stations which even SOCAN concedes form the benchmarks for the Tariff items that apply to streaming, have no minimum fees at all. Other non-event based SOCAN tariffs have minimum fees that are either below or, rarely, just over \$100 per year. There is no precedent for a minimum of \$200 per month. This situation is exacerbated by SOCAN's intent to levy multiple Tariff items on individual websites. The typical radio station website, which streams both simulcasts of its conventional signal as well as other audio content, would be required to pay \$400 per month or \$4,800 per year.

Not only are these amounts out of line with other tariffs, but they also bear no relation to the economics of the affected websites. As noted above, the average radio station website has monthly revenues of about \$3,500. A \$200 monthly minimum represents 5.7% of average revenues, or approximately the rate requested by SOCAN for audio webcasts under item 2(b). At \$400 per month, the combined simulcast/webcast minima amount to 11.4% of average revenue. In other words, SOCAN's minimum fees would amount to far more than what CAB proposes should be the actual fees, and constitute an indirect means of securing for SOCAN a fee rate far beyond that to which it is entitled. Minimum fees should not act as an unacknowledged substitute for "regular" fees.

The CAB is not opposed to establishing appropriate minimum fees for the Tariff items it addresses. The CAB proposes that these minima set at \$60 per year.

(f) Retroactivity

SOCAN seeks the certification of a Tariff that reaches back over 10 years to activities commencing January 1, 1996. Over that period, the courts rejected SOCAN's proposed tariff structure and SOCAN has repeatedly changed its royalty requests. In these circumstances, as a matter of law, the Tariff cannot be certified for the period prior to January 1, 2006 and, alternatively, should be certified in only a nominal amount for that period. No interest should be

¹³ See, for example, the Board's decision regarding NRCC Tariff 3 (Background Music) (2003-2009) at para. 140.

levied on payments for any period prior to certification; alternatively, interest should be levied at reduced rates.

The tariff proposal currently before the Board is fundamentally different from the Tariff formerly proposed by SOCAN for the period 1996-2004. Key differences include the Tariff targets and the nature of the use to which the Tariff was designed to apply. The current proposal targets “Sites or Services” instead of “telecommunications services” and applies to communications to “Users” instead of to “subscribers”. It is beyond the Board’s jurisdiction to apply the current Tariff request to prior periods where to do so would prejudice users who acted on the strength of SOCAN’s prior inconsistent proposals. The CAB will elaborate on these issues further when it files its legal brief.

Alternatively, given the lapse of time and the confusion in SOCAN’s initial approach, it would be unfair to website operators to levy royalties reaching back in excess of 10 years. In a sector marked by rapid developments in both technology and business models, broadcasters face enormous impediments in reviewing up to 10 or more years of Internet operations to recreate their activities for royalty calculation purposes.

Moreover, as noted above, SOCAN changed its tariff structure because its original tariff was ill founded. It changed its formal fee proposal as well. In fact, SOCAN has dramatically changed its fee proposal again in its Statement of Case. Its current requests, while still excessive, reveal the cavalier approach taken by SOCAN to making fee requests in its annual filings with the Board. Potential users of music under SOCAN Tariff 22, in retrospect, have had no reliable basis upon which to make business decisions in this regard. In this context only minimum payments (if any) should be payable for historical periods.

5. WITNESSES

(a) Radio Panel

- Sylvain Langlois, Vice-président and directeur général, CITE RockDétente, Astral
- Paul Larche, President, Larche Communications Inc.
- Earl Veale, Director of Operations, Splice Interactive (the on-line division of Corus Radio)

The Radio Panel will discuss the matters described in their Witness Statement (Exhibit CAB-2), and provide demonstrations of radio station websites.

Estimated time in chief: 1.5 hours.

(b) Television Panel

- Maria Hale, Vice President, Content Business Development, CHUM
- Lucie Lalumière, Vice President and General Manager Interactive, Television, Corus Entertainment
- Jed Schneiderman, Director, Business Development, Digital Media, CTV Inc.
- David Stevens, Vice President, Sales Strategy and Emerging Media, Dose (a division of CanWest Interactive)

The Television Panel will discuss the matters described in their Witness Statement (Exhibit CAB-3), and provide demonstrations of television station websites.

Estimated time in chief: 1.5 hours.

(c) Jeff Vidler, Solutions Research Group

Mr. Vidler will present his expert report entitled *Use and Content of Canadian Broadcaster Websites* (Exhibit CAB-4).

Estimated time in chief: 1 hour.

(d) Jeff Osborne, Callaghan-Osborne

Mr. Osborne will present his expert report entitled *Advertising on the Internet* (Exhibit CAB-5).

Estimated time in chief: 45 minutes.

(e) Professor Frank Mathewson, U of T and Charles River Associates

Professor Mathewson will present his expert report, entitled *Opinion on Economic Issues in SOCAN Tariff 22* (Exhibit CAB-6).

Estimated time in chief: 2 hours.

6. EXHIBITS

Tab	Document	Exhibit Number
1	CAB Statement of Case	CAB-1
2	Radio Panel Witness Statement	CAB-2
3	Television Panel Witness Statement	CAB-3
4	Solutions Research Group Report - <i>Use and Content of Canadian Broadcaster Websites</i>	CAB-4
5	Osborne Report – <i>Advertising on the Internet</i>	CAB-5
6	Mathewson Report - <i>Opinion on Economic Issues in SOCAN Tariff 22</i>	CAB-6
7	SOCAN Responses to Objector Interrogatories 1, 6, 22, 26, 32, 34, 36, 37, 40, 41, 42, 47, 60	