

**3 March 2008**

Ms Helen Daniels  
Assistant Secretary, Copyright Law Branch  
Attorney-General's Department  
Robert Garran Office  
Barton ACT 2600

Dear Ms Daniels ,

**Review of sections 47J and 110AA of the Copyright Act 1968**

SPAA wishes to submit its full endorsement of the Screenrights submission to the above review.

The issues raised in the Screenrights response are of vital importance to the sustainability of the commercial audiovisual sector.

In particular SPAA does not support any change to the current operation of section 110AA. The amendments suggested in the issues paper have the potential to undermine the Australian audiovisual sector's sustainability.

Further, to pursue legislative change as proposed in the issues paper conflicts with other areas of Government policy that aim to build a sustainable film and television industry.

On behalf of SPAA I recommend Screenrights position to you.

Yours sincerely

Geoff Brown  
Executive Director  
SPAA