

DECISION

29 June 2016

Ref. No. 16/01344

The translation of the decision was made by Språkservice Sverige AB.

MEDIA SERVICE PROVIDERS (BROADCASTERS)

See distribution list

SUBJECT

Requirements regarding accessibility of television broadcasts for persons with functional impairments

1 THE DECISION**1.1 General obligations**

The broadcasters listed in Enclosure 1 shall, regarding the listed programme services that are broadcast via the terrestrial network, by satellite or by cable during the period 1 July 2016 to 30 June 2020, promote the accessibility of television broadcasts in Swedish for persons with functional impairments. This promotion shall be in the form of subtitling, sign language interpretation, audio description, spoken text or by similar techniques. Use of the technique referred to as audio description for programmes broadcast in languages other than Swedish with Swedish subtitles is also recognised as being a means of promotion.

The broadcasters may themselves decide which of the techniques that are to be used, on which platforms the facilitation of accessibility is to take place and the extent to which the provision is to be made accessible.

The obligation does not include on-demand TV, although a certain degree of crediting may be applied, see below.

Commercial advertisements and other advertisements shall neither be subject to the requirements, nor included in the review of whether or not a provider has fulfilled its obligations.

1.1.2 Crediting of on-demand TV

With regard to programmes that have been broadcast linearly with or without accessibility technique in the terrestrial network, by satellite or by cable during the reporting period in question, and which have also been made accessible to persons with functional impairments in on-demand TV (non-linear) during the period, the provision in on-demand TV may also be credited in order to meet the requirement to promote the accessibility of linear broadcasts in the terrestrial network, by satellite or by cable. However, such provision in on-demand TV may only be credited on the condition that a facilitation of accessibility to some extent also takes place linearly in the terrestrial network, by satellite or by cable.

1.1.3 Annual report

Broadcasters shall on an annual basis, commencing in 2017 and no later than 31 August, report to the Swedish Press and Broadcasting Authority on how the obligations have been fulfilled for each respective programme service.

Broadcasters shall in addition report on how the work on accessibility facilitation has been conducted during the year, what contacts have been made with representatives of the user groups, how the broadcasters intend to strengthen the accessibility of TV programmes and what the plans for accessibility work are in the future.

1.2 Specific obligations to be fulfilled by some of TV4 AB's programme services

1.2.1 Extent of the obligations to be fulfilled by TV4, TV4 Fakta, Sjuan and TV12

For the period 1 July 2016 to 30 June 2020, TV4 AB shall, with regard to the programme services TV4, TV4 Fakta, Sjuan and TV12, make TV broadcasts accessible in line with the following table. The extent of the obligations is specified per technique as a percentage of the total number of broadcasting hours in the terrestrial network, by satellite and by cable.

	Programmes in Swedish				Programmes with translation text
	<i>Subtitling of pre-recorded programmes</i>	<i>Subtitling of live broadcasts</i>	<i>Sign language interpretation</i>	<i>Audio description</i>	<i>Spoken text</i>
Level 1 1 July 2016 – 30 June 2017	100	40	3	3	0.5
Level 2 1 July 2017 – 30 June 2018	100	45	3	3	1
Level 3 1 July 2018 – 30 June 2019	100	50	3.5	3.5	1.5
Level 4 1 July 2019 – 30 June 2020	100	55	4	4	2

The facilitation of accessibility shall take place in the terrestrial network, by satellite and by cable, or in other words on those platforms where the programme services are offered.

Bearing in mind the needs of the current target groups, TV4 AB may determine the detailed division between these platforms. However, a certain degree of accessibility facilitation shall take place linearly on all platforms.

The obligation does not include on-demand TV, although a certain degree of crediting may be applied, see below under Section 1.2.2 *Crediting of on-demand TV*.

Commercial advertisements and other advertisements

Commercial advertisements and other advertisements shall neither be subject to the requirements, nor included in the review of whether or not a provider has fulfilled its obligations.

Spoken text

The requirement for spoken text covers programmes with translation subtitling into Swedish. Use of the technique spoken text with respect to Swedish programmes may also be counted for fulfilment of the requirement. A review as to whether or not there are the preconditions needed in order to increase the quotas for spoken text will be made before the transition to Level 2, which takes place on 1 July 2017.

Cost ceiling

The obligation does not need to be fulfilled to the extent that the cost of fulfilling the obligation exceeds one per cent of TV4 AB's net turnover for the programme service in question for the calendar year preceding the period that the level concerns.

1.2.2 Crediting of on-demand TV

In the case of programmes that have been broadcast linearly with or without accessibility technique in the terrestrial network, by satellite or by cable during the reporting period in question, and which have also been made accessible to persons with functional impairments in on-demand TV (non-linear) during the period, a provision in on-demand TV may be credited to a certain extent in order to fulfil the requirement to make linear broadcasts accessible in the terrestrial network, by satellite or by cable.

The crediting may not exceed 30 per cent of the broadcasting time that is to be made accessible according to the respective level. The possibility of crediting applies only regarding the question of making programmes accessible through sign language interpretation, audio description and spoken text.

1.1.3 Annual report

TV4 AB shall on an annual basis, commencing in 2017 and no later than 31 August, report to the Swedish Press and Broadcasting Authority on how the obligations have been fulfilled. TV4 AB shall at the same time give a detailed description of the way in which the company has considered the needs of the target groups concerned.

1.3 Annual review

The Swedish Press and Broadcasting Authority will on an annual basis, commencing in 2017 and coming into effect from and including 1 July, review whether further programme services should be covered by the requirements, whether one or more of the programme services that are covered by the general obligations under Item 1 should instead be covered by specific obligations under Item 2 and whether one or more of the programme services that are covered by the specific obligations should instead be covered by the general obligations.

If a regulation is introduced during the period in which the decision is valid, which makes it possible to require facilitation of accessibility of on-demand TV provided by cable to persons with functional impairments, the Authority may decide on such requirements.

2 THE SUBJECT

2.1 Current legislation

A media service provider that supplies TV broadcasting, on-demand TV or searchable Teletext shall design the services in such a way that they will be accessible to persons with functional impairments through subtitling, interpretation, spoken text or a similar technique. The obligation does not include on-demand TV by cable. The Authority decides on the extent of the obligations for all players except the public service broadcasters Sveriges Television AB and Sveriges Utbildningsradio AB. In determining how and to what extent the service shall be made accessible for persons with functional impairments, the media service provider's financial situation and the technical development of the accessibility services must be considered. The decisions shall apply for a certain period of time (Chapter 5, § 12 of the Radio and Television Act, 2010:696).

2.2 Previous decisions on requirements for accessibility

In 2011, the Authority decided for the first time on requirements for accessibility to TV broadcasts for persons with functional impairments (Ref. No. 10/01035). The decision applies to the period 1 July 2011 to 30 June 2016 and the Authority has every year also conducted a new review to determine which broadcasters that are to be covered by the requirements for accessibility. The obligations according to the current decision cover TV broadcasts in the terrestrial network, by satellite and by cable (Ref. No. 14/01458). Specific obligations apply in the case of those programme services that have a viewer share of at least one per cent according to Media Survey in Scandinavia MMS AB's (MMS') annual measurement of viewer percentages. These programme services have quantitatively and successively increasing requirements to make sound and pictures accessible. The specific obligations have, during the decision period, covered three and four respectively of TV4 AB's programme services. Those programme services that have a viewer share of less than one per cent have, according to the current decision, a general obligation to facilitate the accessibility of TV broadcasts in Swedish by means of subtitling, audio description, spoken text or similar technique. For a programme service of this type, it is the responsibility of the broadcaster to determine which of the techniques that are to be used and on which platform or platforms the accessibility facilitation is to take place.

2.3 Impact of previous decisions on requirements for accessibility

The impact of the obligations that were decided on by the Authority in 2011, and which apply up to and including 2016, is that many media service providers are living up to the requirement to promote accessibility of programmes and that more programme hours have become accessible to persons with functional impairments.

2.4 Report of the Authority pending a new decision on requirements for accessibility

During Autumn 2015 and Spring 2016, the Authority has been working on a report which, among other things, incorporates a decision-making model for requirements governing accessibility to TV broadcasts for persons with functional impairments that is to apply for the period 1 July 2016 to 30 June 2020 (Ref. No. 15/02751). The decision-making model has been based on the one hand on the results that have been arrived at so far by the application of requirements and the views that have been expressed by organisations that represent the interests of the functionally impaired, broadcasters and other interested parties, and on the other hand on a number of considerations that the Authority has made regarding who should be covered by requirements and how they should be structured in greater detail. A survey has been made in order to acquire information on the structure of the requirements in other countries, and a comparison has also been made with the requirements that are imposed on the public service broadcasters Sveriges Television AB and Sveriges Utbildningsradio AB. A draft of the report was published on the Authority's website in February 2016 and the players, interested parties and stakeholders concerned were given the opportunity to express their views on the draft. In addition, in February 2016 the Authority held a referral meeting to give players and interested parties the chance to ask questions and express their views on the report. The final report, entitled *Requirements for accessibility to TV broadcasts for persons with functional impairments, a decision-making model from and including July 2016*, was subsequently presented in April 2016. The basic input and reasons for the decision are based on this report.

3 GROUNDNS FOR THE AUTHORITY'S DECISION

3.1 Which players should be covered by the requirements?

The obligation to make programmes accessible to persons with functional impairments covers only providers of media services (Chapter 5, § 12, Radio and Television Act). A provider of media services is defined in the Radio and Television Act as the party that has the editorial responsibility for the choice of content in a sound-radio or TV broadcast, on-demand TV or Teletext, and decides on how the content is structured (Chapter 3, § 1, Item 6).

The definition in the Radio and Television Act is related to the AVMS Directive (Directive 2010/13/EU of the European Parliament and of the Council of Europe of 10 March 2010 on the coordination of certain provisions laid down by law, regulation or administrative action in Member States concerning the provision of audiovisual media services) in which a media service provider is defined as the natural or legal person who has editorial responsibility for the choice of the audiovisual content of the audiovisual media service and determines the manner in which it is organised (Article 1d of the AVMS Directive).

The Authority has, in previous decisions on accessibility, in the review of whether a player shall be considered to be a media service provider, given due consideration to whether the audiovisual media services are mass media, or in other words are intended for reception by, and which could have a clear impact on, a significant proportion of the general public. (cf. Reason 21 in the AVMS Directive).

This review resulted in municipalities, county councils, authorities, schools and real estate firms, etc. that make TV broadcasts, but where such broadcasts are not their principal or a significant task, not being regarded as media service providers in the sense of the Radio and Television Act. For this reason, these types of players are not covered by the Authority's currently valid decision on the obligation to make programmes accessible for persons with functional impairments.

The Authority finds no reason at this point in time to make any other judgement. Therefore, municipalities, county councils, authorities, schools and real estate firms, etc. that make TV broadcasts, but where such broadcasts are of a limited and subordinate importance in the operations, should not be covered by the decision.

3.2 Requirements should be made per programme service

In the preparatory work on the Radio and Television Act it can be seen that the requirements should be focused on programme services (*A new Radio and Television Act*, Bill 2009/10:115, page 130 f). A possibility for a programme provider to choose in which of its programme services accessibility facilitation should be applied would probably lead to less accessibility to programmes in general and thereby counteract the purpose of the regulation. The present decision-making model, with requirements per programme service, should therefore continue to apply.

3.3 Different technological solutions may be used in order to facilitate the accessibility of TV programmes

There are different technological solutions to facilitate the accessibility of TV programmes with subtitling, interpretation and spoken text. The Authority is of the opinion that no requirements should be made as to which technological solutions a provider should use for the various techniques.

Sign language interpretation or spoken text that is supplied via a soundtrack in a separate unit such as a cell phone or an eReader, at the same time as a TV programme is being broadcast linearly should, when reviewing whether a programme provider is meeting its obligations, be credited as a form of accessibility facilitation.

3.4 The obligations

When determining the extent of the obligations, consideration should be given, among other things, to the financial preconditions of the respective broadcaster which, among other things, includes viewer time shares (Bill 2009/10:115 page 134). In line with current decisions, a viewer time share of one per cent or more for a programme service should mean that specific obligations can be imposed on the programme company and for programme services that have a viewer share of less than one per cent general obligations should apply. Using a specific limit value of this type gives a clarity and a predictability for the players concerned.

3.4.1 General obligations

The general obligations should have the same scope as per the previous decisions and should incorporate the programme services that are broadcast in the terrestrial network, by cable or by satellite, and which for the year 2015 had a viewer share of less than one per cent.

Those broadcasters that have general obligations should therefore promote the accessibility of TV broadcasts in Swedish for persons with functional impairments, which means that broadcasters should work for and promote the improvement of the accessibility of their TV broadcasts for persons with functional impairments. This promotion should be given in the form of subtitling, sign language interpretation, audio description, spoken text or some other form of similar technique. The use of spoken text for programmes in languages other than Swedish with Swedish translation text should also be approved as a form of promotion.

It should be the responsibility of the broadcasters to decide on the extent to which they have the possibility to make their programmes accessible. During the year, however, a certain number of programmes should be made accessible and the intention is that more programmes shall successively be made accessible during the period in which the decision will apply.

Commercial advertisements and other advertisements should neither be subject to the requirements, nor included in the review of whether or not a provider has fulfilled its obligations.

3.4.2 Specific obligations for TV4 AB

According to MMS' Annual Report 2015, four Swedish programme services had a viewer share of at least one per cent during 2015. These were TV4 AB's programme services TV4, TV4 Fakta, TV12 and Sjuan. The specific obligations should therefore cover these four programme services.

Platforms

It is important for users that programmes are made accessible on all platforms. Therefore, the specific obligations should continue to apply in the terrestrial network, by satellite and by cable, or in other words on those platforms where a programme service is offered. Bearing in mind the needs of the current target groups, TV4 AB may determine the detailed allocation between these platforms. This means that TV4 AB cannot entirely ignore a platform where the current programme service is offered. A certain accessibility facilitation must take place on all platforms.

Requirements should be imposed per technique

In earlier decisions concerning accessibility, the requirements according to the specific obligations have been imposed on sound and pictures. However, the Authority has in its report indicated that these requirements should from now on be imposed per technique. The reasons for this are, among other things, that a decision-making model of this type is clear and predictable as well as comparable with requirements for public service broadcasters, and those companies that have been set up in Great Britain, among others TV5 and TV3, whose broadcasts are addressed to a Swedish audience. By specifying levels for each individual technique, a guarantee is given that all techniques are used to a greater

extent than is the case according to the current decision, and that development of the various techniques is stimulated.

When determining whether or not the levels have been fulfilled, the Authority will start from the total number of hours broadcast in the terrestrial network, via satellite and by cable.

Subtitling of pre-recorded programmes and live broadcasts

Up to and including March 2014, TV4 AB had a condition in the broadcasting licences for all the programme company's programme services in the terrestrial network that all Swedish nationally broadcasted programmes which are not transmitted live should be subtitled. The Authority thus considers that there is still every reason to require that TV4 AB should continue to subtitle 100 per cent of pre-recorded programmes in Swedish.

Subtitling of live broadcasts consumes more resources than subtitling of pre-recorded programmes. Requirements for subtitling live broadcasts should therefore be lower than the requirements to subtitle pre-recorded programmes. On behalf of the Government, the Swedish Post and Telecom Authority (PTS) is at present conducting a pilot project which, inter alia, means that a subtitling of live broadcasts prototype for the transmission of weather forecasts is being developed. The prototype for SVT's weather forecast transmissions will be completed in December 2016 and the entire Government commission by March 2017. As things stand at present, the Authority deems, however, that it is very difficult to determine whether TV4 AB would be able to make use of this kind of technique within the coming decision period, and therefore the Authority has given no consideration to such a development in the quotas for subtitling live broadcasts.

During the first period 1 July 2016 to 30 June 2017, at least 40 per cent of the live broadcasts should be subtitled in order to subsequently gradually increase to 55 per cent in 2019/2020. This can be compared with SVT and UR, which will in 2016 subtitle 65 per cent of the live broadcasts offered in Swedish.

Sign language interpretation

Against the background of the fact that TV4 AB at present has relatively well-developed sign language interpretation operations, three per cent of the total number of broadcasting hours in Swedish should be made accessible with this technique during the first two levels that the decision covers. The programme company should then successively increase its use of the technique sign language interpretation, so that by June 2020 at least four per cent of the broadcasting hours are made accessible by means of this technique.

Audio description and spoken text

As things stand today, TV4 AB has no established technological solution for transmitting spoken text, and has therefore decided to make pictures accessible by, primarily, audio description. At present in Sweden, developments are taking place in the distribution of the techniques spoken text and audio description since broadcasters have, to a greater extent than previously, begun to use a technological solution with one (1) digital box. Users can

switch the box on and off via the remote control, which means that the techniques, as with subtitling, will be selectable. TV3 and TV6 offer audio description in this way to their Viasat customers and SVT is also testing a solution with a digital box for spoken text. However, the technological solution with one digital box has not yet been established to reach a broad public in Sweden, and the user groups do not feel that the technique, which means that two boxes are necessary, is useable.

Another technical solution for spoken text is to provide it via an application for mobile telephones. However, TV4 and other commercial players have not yet developed a technique of this type.

Successively increasing requirements for *audio description* should continue to apply to TV4 AB. In order to give the programme company the opportunity to adapt its operations to the requirements, the quota for audio description should, however, as is the case for sign language interpretation, amount to three per cent during the two introductory periods.

The requirement for spoken text should be based on a lower level than audio description since TV4 AB has not gotten started with this technique. However, also this requirement should increase over time. If TV4 AB cannot find useable automated solutions, the opportunity always exists to offer manually read-in premixed programmes with spoken text, which the company already offers today but to a very limited extent.

However the Authority intends to, during the first year that the decision covers, make a new review as to whether or not the necessary preconditions exist to increase the quotas for spoken text. In a new review of this type, the technological and economic preconditions for TV4 AB will be evaluated. In the Authority's opinion, it is reasonable that the company should in the long term have to meet a requirement which means that 100 per cent of all translation text into Swedish shall be made accessible through the technique of spoken text. TV4 AB's ambition should therefore be to share in the technological development that is taking place and, in dialogue with user groups, develop the service concerned in a suitable way.

Spoken text is primarily intended for translation subtitling and thus in the first instance for programmes in languages other than Swedish. The requirement therefore covers programmes in languages other than Swedish with Swedish translation subtitling. The use of the technique spoken text for programmes in Swedish may also be included in the fulfilment of the requirement.

Content and language

Detailed requirements should not be made concerning the content that is to be made accessible. TV4 AB should decide independently on the content that is to be made accessible, based on the needs of the target groups.

Bearing in mind that the requirements for subtitling and interpretation for public service broadcasters only apply to Swedish programmes, the same should also apply in the case of TV4 AB. On the other hand, the requirement for spoken text should apply in the case of programmes with translation subtitling into Swedish, as well as to programmes in Swedish that are subtitled.

Commercial advertisements and other advertisements should neither be covered by the obligation nor included in the review of whether a provider has fulfilled its obligations.

Cost ceiling

As with the present decision, the obligations do not need to be fulfilled to the extent that the cost of fulfilling them exceeds one per cent of TV4 AB's net turnover for the programme service in question during the calendar year before the period that the level in question concerns.

3.5 Accessibility facilitation in on-demand TV should be credited

It is at present not possible to require accessibility to be facilitated for TV programmes that are supplied via on-demand TV by cable. The Authority is furthermore of the opinion that requirements should not be made for on-demand TV that is made available in any way other than by cable either. There are, however, in the opinion of the Authority no legal obstacles against taking into consideration that accessibility facilitation has taken place in on-demand TV. By taking accessibility facilitation in on-demand TV services into consideration, the Authority is giving due consideration to the growing importance of such services and can to a greater extent meet the needs of the user to be able to view programmes by means of on-demand TV on equal terms. It should be possible for consideration to be given to such accessibility facilitation for broadcasters with general obligations, as well as for broadcasters with specific obligations.

3.5.1 Programme services with general obligations

The accessibility facilitation of programmes in on-demand TV should be possible to credit on condition that the programme has also been broadcast, with or without accessibility technique, in the terrestrial network, by satellite or by cable during the reporting period in question. A provision of this type in on-demand TV may, however, only be credited on condition that accessibility facilitation is also provided to a certain extent linearly in the terrestrial network, via satellite or by cable.

A programme company with general obligations that has promoted accessibility by, for example, having subtitled a number of programmes in the terrestrial network or on cable TV may in other words also include the same or other programmes that have been broadcast linearly in the terrestrial network or cable TV during the period, and which have been provided with subtitling in the provider's on-demand TV service.

3.5.2 TV4 AB's programme services with specific obligations

The techniques of sign language interpretation, audio description and spoken text are technically well suited for accessibility facilitation in on-demand TV. The greater part of the accessibility facilitation should, however, take place in linear broadcasting.

Crediting, however, should not be possible with regard to the subtitling of pre-recorded programmes since TV4 AB, in line with this decision, should be subject to a requirement that 100 per cent of pre-recorded programmes in Swedish are to be subtitled. A crediting of programmes that have been made accessible in on-demand TV would therefore in practice mean a lowering of the requirement and entail a risk of resulting in a lower percentage of accessible programmes, which is undesirable. Nor should it be possible to credit subtitling of live broadcasts, since a programme that is provided through an on-demand TV service - where the user him or herself determines the starting point for the programme - is not a live broadcast. The quota for subtitling of live broadcasts therefore needs to be filled solely by using these techniques in linear broadcasts in the terrestrial network, by satellite or by cable.

In order for a crediting to be possible, there should be a requirement that it must be a question of programmes that have been transmitted linearly with or without accessibility facilitation technique in the terrestrial network, via satellite or by cable during the review period in question, and which have also been made accessible to persons with functional impairments in on-demand TV during the period in question. The crediting may not exceed 30 per cent of the transmission time that is to be made accessible according to the respective level concerned. The possibility of crediting applies only in the matter of accessibility facilitation by means of sign language interpretation, audio description and spoken text.

This can be illustrated with the following example. A programme company with specific obligations which for one of its programme services during the review period has transmitted 4 000 hours in the terrestrial network, by satellite and by cable, respectively, a total of 12 000 hours, shall according to Level 1 have made accessible at least 360 of these hours using the technique of sign language interpretation (3 per cent of 12 000 hours). At most 108 hours of sign language-interpreted programmes (30 per cent of 360 hours) that have been provided in on-demand TV may be credited to fulfil this requirement, however on the condition that the 108 hours refer to such programmes that have also been broadcast linearly within the review period concerned. The remaining 252 hours must be made accessible linearly. The provider may, with due consideration taken to the needs of the target groups concerned, decide on how the 252 hours are to be divided between the platforms terrestrial network, satellite and cable. To a certain extent, however, some form of accessibility facilitation must take place on each of these platforms.

3.6 Annual review of the scope of the obligations

The Authority should continue to review on an annual basis whether new media service providers should be covered by obligations, as well as which players and programme services that are to be covered by general or specific obligations. This means that a review must be made as to whether one or more of the programme services that are covered by the general obligations under Item 1 should instead be covered by the specific obligations under Item 2, and whether one or more of the programme services that are covered by the specific obligations should instead be covered by the general obligations.

In June 2014, the Government appointed a committee with the task to, among other things, analyse the possibilities of imposing the same requirements for on-demand TV provided by cable as for TV broadcasts and on-demand TV provided through other means than cable when it comes to accessibility for persons with functional impairments (Directive 2014:97). If the Committee considers that changes are necessary, it shall submit the necessary legislative proposals. A report will be submitted no later than 1 September 2016.

If a regulation is introduced during the period of validity of the decision, which means that requirements can also be made on facilitating the accessibility of on-demand TV provided via cable for persons with functional impairments, the Authority may decide on such requirements.

3.7 Reporting and follow-up

All media service providers that are covered by the decision should each year, commencing in 2017, report to the Swedish Press and Broadcasting Authority on how they – during the period 1 July – 30 June – have fulfilled their obligations **in order for** the Authority to be able to judge whether or not each individual programme company has succeeded in meeting the requirements that have been set. This report should, in the case of broadcasters with general obligations, also give an account of how the accessibility facilitation work has been conducted during the year, what contacts have been made with representatives of the user groups, how the programme company intends to strengthen the accessibility of TV programmes and what the plans are for future accessibility facilitation.

TV4 AB's report should also contain a detailed description of how the company has taken the needs of the current user groups into consideration.

If a programme company has failed to fulfil the requirements that have been imposed on it, the Authority may order the programme company to do so. An order may be made under penalty of a fine .

3.8 Duration of the decision

When deciding on the duration of the decision, consideration should be given to the needs of the programme companies for clarity and predictability, and the rapid technological

development. The technological development may in time make various forms of accessibility facilitation easier, and at the same time decrease their costs, which could in the end also mean that the Authority can impose more far-reaching requirements regarding accessibility. The Authority finds, with due consideration taken to this fact, that the decision should apply throughout the period 1 July 2016 – 30 June 2020.

For details on how to appeal, reference is made to Enclosure 2.

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The original document, complete with signatures, is in the possession of the Authority.