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Sound and audiovisual private copying

Recommendation No. R (88) 1
adopted by the Committee of Ministers
of the Council of Europe
on 18 January 1988
and explanatory memorandum



Forty years
Council of Europe

Strasbourg 1989

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RECOMMENDATION No. R (88) 1
OF THE COMMITTEE OF MINISTERS TO MEMBER STATES
ON SOUND AND AUDIOVISUAL PRIVATE COPYING

*(Adopted by the Committee of Ministers on 18 January 1988
at the 414th meeting of the Ministers' Deputies)*

The Committee of Ministers, under the terms of Article 15.b of the Statute of the Council of Europe,

Considering that the aim of the Council of Europe is to achieve a greater unity between its members for the purpose of safeguarding and realising the ideals and principles which are their common heritage and facilitating their economic and social progress;

Having regard to the need to safeguard properly the interests of the owners of copyright and neighbouring rights faced with the new media technology, in particular the technology used for sound and audiovisual private copying;

Bearing in mind at the same time the need not to hamper the development of this technology, which is of considerable importance for the dissemination of works of the mind;

Taking note of the fact that the copyright obligations between Council of Europe member states are governed by the Berne Convention for the Protection of Literary and Artistic Works (the Berne Convention) and that many of the member states are also party to the International Convention for the Protection of Performers, Producers of Phonograms and Broadcasting Organisations (the Rome Convention);

Considering that Article 9, paragraph 1, of the Berne Convention (Paris Act, 1971) grants authors an exclusive right of reproduction of their works and that Article 9, paragraph 2, provides that exceptions to that exclusive right are allowed under national law only in certain special cases, and provided that such reproduction does not conflict with a normal exploitation of the work and does not unreasonably prejudice the legitimate interests of the author;

Considering also that Article 15 of the Rome Convention allows for exceptions under national law to the protection granted under that convention as regards private use, but that, as the protection granted under the convention must not in any way affect the protection of copyright in literary and artistic works, such exceptions would in practice be possible only under the same conditions as those prevailing in respect of protected works;

Bearing in mind Article 3, sub-paragraph 1.c of the European Agreement on the Protection of Television Broadcasts, which allows for exceptions to the protection under the agreement where the fixation, or the reproduction of the fixation, of such a broadcast is made for private use;

Considering that present-day technology for the reproduction of protected works, contributions and performances allows for such reproduction, in particular as regards musical and cinematographic works and related contributions, on a scale which was not possible when the provisions of the above-mentioned instruments were drawn up;

Recalling its Recommendation No. R (86) 9 on copyright and cultural policy of 22 May 1986;

Concerned to promote the broadest possible harmonisation of the legal approaches of member states to copyright and neighbouring rights in relation to sound and audiovisual private copying;

Considering that the Council of Europe is particularly well suited to elaborate and recommend principles in this field at European level,

Recommends that the governments of member states examine the questions concerning copyright and neighbouring rights which arise in relation to sound and audiovisual private copying and, in so doing, be guided by the following principles:

1. States should, in their legislation on copyright and neighbouring rights, limit exceptions to the exclusive rights of right owners, according to the letter and spirit of the relevant provisions of the Berne Convention;
2. States should, having regard to Article 9 of the Berne Convention, carefully examine whether sound and audiovisual private copying in their respective countries is not done in a way and to an extent that conflict with the normal exploitation of works or otherwise unreasonably prejudice the legitimate interests of right owners, including at least authors, performers and producers of sound and audiovisual recordings. Such a conflict or prejudice should be taken as established if sound and

audiovisual private copying occurs on such a scale as to amount to a new form of exploitation of protected works, contributions or performances;

3. In case of such conflict or prejudice, states should seek solutions in accordance with the following paragraphs, with a view to providing appropriate remuneration to right owners:

a. The situations in which the reproduction of protected works, contributions and performances for private purposes does not require the authorisation of the right owners should be defined as closely as possible;

b. As regards those copies the making of which does not require the authorisation of the right owners, states should take note of the fact that, in a number of states where sound and audiovisual private copying has been found to be incompatible with the obligations under the international conventions on copyright and neighbouring rights, a royalty-type levy on blank recording media and/or recording equipment has been introduced and that the experience of states in which such systems are already in operation would indicate that they are an effective solution to the problem;

c. When considering the introduction of a right to remuneration, states should include amongst those entitled to remuneration at least authors, performers and producers of sound and audiovisual recordings. Insofar as these categories of persons do not already possess reproduction rights, such rights should be awarded to them.

EXPLANATORY MEMORANDUM

I. Introduction

During the last twenty-five years new techniques have been developed which enable individuals to reproduce protected works, contributions and performances for private purposes without remuneration of the right owners. The power of reproduction — previously in the hands of professional industries alone — has been shifted in part to non-professional users. This is true for printed matter as well as for sound recordings, videograms, broadcasts and computer software.

This situation has given rise to concern not only on the part of the right owners but also of governments and of intergovernmental organisations responsible for the protection of intellectual property, such as the World Intellectual Property Organisation (WIPO) and the United Nations Educational, Scientific and Cultural Organisation (Unesco), as well as, with regard to neighbouring rights, the International Labour Office (ILO).

In 1978, sub-committees established by the Executive Committee of the Berne Convention for the Protection of Literary and Artistic Works, the Intergovernmental Committee of the Universal Copyright Convention and the Intergovernmental Committee of the Rome Convention for the Protection of Neighbouring Rights, discussed — amongst other legal questions concerning videograms — the problem of the private reproduction of videograms. Further, in 1984 a group of experts met under the auspices of WIPO and Unesco to discuss unauthorised private copying of recordings, broadcasts and printed matter. The findings of these sub-committees and the group of experts — which were subsequently forwarded to their respective parent committees — were taken into account when the present Recommendation was drawn up.

The problems arising from the reproduction for private purposes of protected works, contributions and performances have become particularly pronounced in the sound and audiovisual spheres. The Committee of Ministers of the Council of Europe first addressed these problems in its Recommendation No. R (86) 9 on copyright and cultural policy of 22 May 1986, and the present Recommendation reinforces

those earlier provisions. The Recommendation has been prepared on the basis of an assessment of the present situation as regards the private copying of sound and audiovisual recordings and of broadcasts containing protected material (so-called "home taping") in the member states of the Council of Europe. The intention is to lay the basis for appropriate steps aimed at mitigating any negative effects of home taping felt in these states.

In order to ensure that all relevant views on the subject of home taping were tabled and duly considered, the Council of Europe's Committee of Legal Experts in the Media Field (MM-JU) invited interested international non-governmental organisations to a hearing on 12 September 1985. The hearing brought together associations representing owners of copyright and of neighbouring rights (that is, performers, producers and broadcasters), the tape industry, manufacturers of consumer electronics, consumer interests and trade unions.¹ The hearing revealed the following basic positions:

— On the one hand, it was argued that, as a result of the means of reproduction now available to the general public, home taping occurred on a considerable scale; moreover, the copies made were of very high quality. In short, a new means of exploiting protected works had arisen which went well beyond the limits of the exceptions to the exclusive rights of authors provided for by the international conventions on copyright. This situation, it was felt, was in itself sufficient to justify the introduction of a system of remuneration of the owners of copyright and neighbouring rights. However, there was in addition clear evidence that home taping resulted in substantial economic loss for the right owners. In this regard, it was stressed that in the interests of maintaining creativity it was essential to provide right owners with appropriate remuneration for the use made of their works, contributions and performances.

— In reply, it was argued that, far from causing economic harm to right owners, home taping had, on the contrary, been beneficial to them; it had led to a more widespread diffusion of music and images than otherwise would have been the case, which in turn helped to generate sales of pre-recorded material. By way of example, it was pointed out that the total sales of pre-recorded music was increasing significantly, not decreasing. Further, it was commented that to provide remuneration

1. The proceedings of the hearing are available on request from the Secretariat of the Council of Europe.

for right owners via a levy on blank tapes and/or recording equipment would be unfair, since such tapes and equipment were frequently used for purposes which did not involve infringement of intellectual property rights. Attention was also drawn to the already high level of taxation on the relevant equipment; additional charges could slow down the development of new technology and the markets it helped to create, which in the long run would prove detrimental to right owners.

The point of departure of the Recommendation is that new technological developments — in whichever field they are introduced — form part of modern daily life and in principle are to be welcomed; the uses that can be made of them should not be limited unduly. However, governments must ensure that such developments do not cause inordinate harm to the economic rights of copyright and neighbouring rights owners in their works, contributions or performances. Safeguarding the legitimate interests of right owners is ultimately in the interests of society as a whole; indeed, if the economic basis for the production and publication of literary and artistic works were ever to be undermined, this would clearly have a harmful effect on output, both qualitatively and quantitatively.

Before the provisions of the Recommendation are commented upon, it should also be stressed that private copying is to be carefully distinguished from piracy. While private copying only serves for the use of the person who makes an unauthorised copy, piracy in the field of copyright and neighbouring rights is commonly understood as the unauthorised duplication for commercial purposes (that is, sale or hire) of protected works, contributions or performances. This Recommendation does not deal with the problem of piracy, which is the subject of another Recommendation of the Committee of Ministers (see Recommendation No. R (88) 2).

II. Commentary on the provisions of the Recommendation

General remarks

Copyright law, as incorporated in the international copyright conventions such as the Berne Convention¹ and the Universal Copyright Convention¹, accords to the author of a literary, scientific or artistic work the economic fruits of his creation. While the rights set out in the

1. References to both conventions relate to their respective Paris Acts of 1971.

Berne Convention are minimum rights which states parties to the convention must grant to authors from other states parties, the Universal Copyright Convention obliges states which ratify it to introduce into their national laws the rights stipulated in the convention. All Council of Europe member states are members of the Union established by the Berne Convention, and the Recommendation is based on the principles of that convention since it provides the higher level of protection.

Under the Berne Convention (and the Universal Copyright Convention) the author's proprietary interests are preserved by reserving to him the exploitation of his works. The author's exploitation rights include the right to make copies of the works, in whatever manner or form. This right is in principle — as are all exploitation rights — an exclusive right, that is, the author alone can authorise or prohibit its exercise, authorisation generally being subject to remuneration.

However, the author's exclusive right as regards the making of copies of his works is subject to certain restrictions. According to Article 9, paragraph 2, of the Berne Convention, national legislation may permit the reproduction of protected works in certain special cases, provided that such reproduction does not conflict with a normal exploitation of the work and does not unreasonably prejudice the legitimate interests of the author.

Mention should also be made of the Universal Copyright Convention, which is relevant to relations between Council of Europe member states and those non-European states which are not states parties to the Berne Convention. Article IV *bis*, sub-paragraph 2, of the Universal Copyright Convention allows contracting states to provide within their national legislation for exceptions to the author's rights which do not conflict with the spirit and provisions of the convention. However, states whose legislation so provides are obliged to grant a reasonable degree of effective protection to the rights to which exception has been made.

Most national legislations take advantage of the possibility offered by the conventions to allow certain exceptions to the author's exclusive right of reproduction and, on the assumption that such exceptions neither conflict with a normal exploitation of the work nor unreasonably prejudice the legitimate interests of the author, do not grant remuneration for this use. One of the most important exceptions commonly made is that which allows the making of copies for private use without the author's consent. Similarly, the international conventions for the protection of neighbouring rights allow exceptions to the protection they grant as regards private use.

However, in recent years it has become obvious that the assumption that private copying in the sound and audiovisual spheres does not conflict with the normal exploitation of an author's work cannot be sustained; and a comparable situation exists in so far as neighbouring rights are concerned. Existing technology enables the making of high-quality copies both quickly and cheaply; home taping has in fact been continuously on the increase since the invention of the tape, and has grown particularly since the introduction of the blank tape cassette. Further, as a result of steadily falling prices for equipment, the majority of households now own recording equipment.

A study made by the International Federation of Phonogram and Videogram Producers (IFPI) at the request of the Council of Europe gives figures on the underlying factual situation concerning home taping. The figures given corroborate what is obvious in daily life. Faced with this situation, several countries have introduced a system of remuneration for home taping. In other countries, the question of whether and to what extent home taping should be allowed, and of how the right owner's economic interests can be protected, is under examination.

The present Recommendation calls upon member states of the Council of Europe to examine the questions concerning copyright and neighbouring rights which arise in relation to sound and audiovisual private copying and establishes certain principles which are designed to help member states strike a balance between the different interests at stake.

Principle 1: Preservation of the exclusive rights of right owners

This principle stresses the need to limit exceptions to the exclusive rights of right owners, according to the letter and spirit of the provisions of the Berne Convention. The principle refers to the Berne Convention because in practice it will be the standards of that convention which apply.

Copyright is based on the exclusive nature of authors' rights, and preservation of this basis is essential given that only the possession of exclusive rights enables authors to negotiate the use of their works and thereby obtain adequate remuneration for it. Legal licences entitling third persons to use an author's work without his consent and without remuneration deprive him *inter alia* of his fundamental right to the economic fruits of his work. Even if the author is granted remuneration, a legal licence still amounts to a limitation of his rights, as he only receives a remuneration fixed by others and not one freely negotiated by himself.

Principle 2: Examination of the impact of home taping on right owners' interests

In order to safeguard the economic rights of authors and neighbouring rights' owners in their works, contributions and performances, the situation regarding home taping should be verified by each member state.

Although it cannot be assumed that for each copy of a work that is reproduced by home taping a pre-recorded copy would have been bought or rented if the equipment required for home taping had not existed, it can certainly be assumed that many more industrially made sound recordings and videograms would be sold or hired if the present technological means for home taping were not available. However, the fact that not every home-taped copy is a substitute for a purchased or rented pre-recorded copy has given rise in certain quarters to the opinion that authors and other right owners suffer no loss as a result of this practice and that therefore remuneration for home taping is not justified.

However, this view does not square with the letter and spirit of the copyright conventions. An infringement of the latter does not lie in a mathematical correspondence between the number of copies made by home taping and the reduction in the number of pre-recorded records, cassettes and videograms that are sold or hired. Rather, the issue of compatibility with the conventions is dependent on the reply to the following question: does home taping remain copying for private purposes occurring on a small scale or has it instead taken on such a dimension that it has evolved into a new form of exploitation of protected works? Indeed, as a result of technical development, the traditional manner of copying has been superseded by far more efficient methods, and the point to be examined under these conditions is whether the customary exceptions to the exclusive right of reproduction have been exploited to create a branch of production beyond the control of right owners. In short, has home taping in a given country developed into a market in its own right for the use of intellectual property? If this question were to be answered in the affirmative, then one would be in the presence of a situation which conflicts with the letter and spirit of the Berne Convention, the latter entitling the author to negotiate the use made of his works unless it is of minor importance.

When ascertaining whether a new market for the use of intellectual property has developed, states could *inter alia* take into account the sales figures of blank recording media, as they are indicative of the extent of home taping.

A number of countries have already reached the conclusion, following an examination of the situation, that measures have to be taken to mitigate the consequences of home taping. Should other states reach the same conclusion, *inter alia* because they consider that home taping has attained the quality of a new form of exploitation of protected works, they should seek solutions which guarantee the economic rights of authors and other right owners in their works, contributions or performances, by allowing home taping within appropriate boundaries and providing adequate remuneration for the right owners. The provisions of Principle 3 of the Recommendation provide guidelines as to how this should be done.

Principle 3: Solutions in the event of home taping being found to be harmful to right owners' interests

When tackling problems arising from home taping, two distinct steps are to be considered. The first concerns the identification of those situations in which home taping does not require the authorisation of the right owners; the second concerns the granting of remuneration to the right owners in respect of the copies made in such situations.

Paragraph a: The boundaries of reproduction by means of home taping without the authorisation of the right owners

At the outset, the first step has to be considered carefully, as every right to use a right owner's intellectual property without his consent involves an interference with and a diminution of his economic rights in that he is deprived of the capacity to negotiate his consent to use the intellectual property concerned in return for a remuneration which he considers adequate.

Paragraph a stipulates that the situations involved should be defined as closely as possible. Above all, it should be made clear that home taping without the authorisation of the right owner is restricted to making copies for strictly personal use; the distribution of such copies to the public or their use for a public performance should be prohibited.

Paragraph b: Remuneration for home taping

As regards the second step, it should be noted that several countries, amongst them member states of the Council of Europe, have already legislated on remuneration for home taping. In 1966, the Federal Republic of Germany introduced a levy on recording equipment; by an amendment to the Copyright Act which came into force on 1 July 1985,

this levy on equipment was replaced by a combined system providing for a levy on equipment and on blank recording media. Iceland, Portugal and Spain introduced a levy on both equipment and blank recording media in 1984, 1985 and 1987 respectively. Austria introduced a levy on blank recording media in 1980, and France in 1985. Under these different national legislations, the level of the levy has been set as follows (as at 1 January 1988):

Austria: audio tapes, 2.40 AS per hour of playing time; video tapes, 4.20 AS per hour of playing time;¹

France: audio tapes, 1.50 FF per hour of playing time; video tapes 2.25 FF per hour of playing time;

Federal Republic of Germany: audio tapes, 0.12 DM per hour of playing time; video tapes, 0.17 DM per hour of playing time; audio and video equipment, flat fee of 2.50 DM and 18.00 DM respectively, per piece of equipment;

Iceland: audio tapes, flat fee of 10 IKR; video tapes, flat fee of 30 IKR; audio and video equipment, 4% of the manufacturer's or importer's price;

Portugal: levy level not yet set;

Spain: levy level not yet set.

Paragraph *b* recalls that the way which a number of states have chosen to follow as regards remuneration for home taping is a system of royalty-type levies on blank recording media and/or recording equipment, and indicates that such systems have proved an effective solution to the problem.

That the levy should be of a royalty-type is based on the fact that the contractual clearance of rights between right owners and users is governed by civil law; this being so, the claim a right owner has for the use of his intellectual property under a legal licence should be subject to civil law as well. This implies that the right owners would be entitled to the full benefit of the remuneration raised by a royalty-type levy on

1. A one-third rebate is granted to manufacturers or importers who sign a contract with the collecting society involved based on a model contract established by the collecting societies and industry associations.

blank recording media and/or recording equipment. Such a levy is a copyright remuneration based on the Berne Convention, in so far as it affords the beneficiaries a claim for the individual use made of their intellectual property. The individual character of the levy remains notwithstanding a collective administration of the claim.

A royalty-type levy as described above is to be distinguished from the taxation of blank recording media or recording equipment. Even if the right owners were to receive part of a tax raised on blank recording media or recording equipment, this would not be remuneration for the use of their intellectual property but would instead amount to a subsidy granted by the state.

Paragraph c: Entitlement to remuneration (and certain other practical aspects)

Paragraph c stipulates who should be entitled to receive remuneration. According to the Berne Convention, authors, that is copyright owners, are entitled to remuneration. As all Council of Europe member states are members of the Union established by the Berne Convention, the allocation of remuneration to authors does not cause difficulty. With regard to neighbouring rights, the Recommendation stipulates that performers and producers of sound and audiovisual recordings should also receive remuneration in respect of the use made of their performances and contributions through home taping. In this connection the Recommendation indicates that performers and producers should be awarded rights of reproduction if this has not already been done. Other categories of right owners might equally be taken into consideration, depending on national legislation. It is for this reason that the expression "at least" authors, performers, and producers of sound and audiovisual recordings, is employed in paragraph c.

*

* *

In the interests of making available existing experience in the field of home taping to those states which are considering legislation on the subject, it was felt appropriate to add the following remarks.

When introducing a system of remuneration for home taping, the greatest practical difficulty concerns the manner of realising the claim. Home taping takes place in the private sphere, and hence no control

over it is possible ; further, systems based on voluntary licensing, that is, under which the user was voluntarily to buy a licence and thereby acquire the right to home-tape, were not effective.

In the previously mentioned legislation of certain member states of the Council of Europe, models for the realisation of the claim for remuneration have been developed which have proved successful. Under them the manufacturer and the importer of blank recording media and/or recording equipment pay by way of a levy on their products. The justification for this system lies in the fact that the producers of blank recording media and of recording equipment enable the user to carry out the copying, the effects of which might amount to an infringement of the basic copyright provisions. It is precisely this possibility of making copies, that is of using blank recording media and recording equipment for home taping, which gives these products their marketing chances and their economic value.

For foreign products which are sold in a country possessing such legislation, the importer should be liable to pay the remuneration, to substitute the claim against the foreign producer. On the other hand, a copyright levy should not be imposed on exported products by the country of origin, as the products are not used in that country.

Similarly, products which clearly are not or cannot be used for the purposes of home taping should be exempted from the levy. This applies, for example, to equipment which, by virtue of its technical features, size or price, can only be used for professional purposes or for dictating cassettes.

Finally, the question arises of how to administer the collection of the remuneration. Those countries which have already legislated on home taping have made the right to remuneration subject to collective administration. Indeed, it is obvious that this is the only practical way to collect and distribute the remuneration.

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