

# Kluwer Competition Law Blog

## The Bulgarian Competition Authority Published a Sector Analysis of the Media Market in the Country

Zoya Todorova, Radina Tomanova (Dimitrov, Petrov & Co.) · Tuesday, July 10th, 2018

Approximately 3 months after initiation of the sector inquiry into the media market in Bulgaria, the national Commission for Protection of Competition (the Commission) published its report on the conducted investigation.

As intended, the Commission analysed the activities of all media service providers in the sector. The conclusions of the investigation, however, raise certain concerns as to the level of fair competition on the market.

As a first point, the Commission notes certain unfair practices related to the reporting of platform operators' subscribers, resulting in distortion of competition in the market of distribution of TV programs, as well as in the TV content market. In these circumstances, the Commission recommends that improvements of the market environment should be sought in policies to clear the "gray sector".

Next, given the level of concentration and vertical integration on the market, the Commission notes that establishing a special register would have a positive effect. The register should provide information on the beneficial owners of all media and media content providers.

The analysis also focuses on advertising budgeting and the hurdles some smaller media operators face. It is established that a major part of the advertising budgets is provided to big media groups which places smaller media providers at a disadvantage, thus leading to conditions which could easily exclude them from the market. The Commission recommends that any additional financing with public funds (beyond the established funding and/or business model), incl. program funds, should be implemented under clear rules, transparent, non-discriminatory conditions and effective control.

In addition, the report analyses the notes made by some market participants whom the Commission approached related to the lack of reliable information about the circulation and printing of printed media. The competition authority's suggestion is that stakeholders and competent authorities in this field discuss the proposals on printed media circulation made by branch organizations, so that a workable solution for all parties is adopted.

Lastly, it should be noted that the Commission has informed the National Assembly, the Council of Ministers, as well as the respective ministries on its findings in order for those competent

authorities to undertake appropriate measures for improving the media market environment.

---

To make sure you do not miss out on regular updates from the Kluwer Competition Law Blog, please subscribe [here](#).

---

To make sure you do not miss out on regular updates from the Kluwer Competition Law Blog, please subscribe [here](#).

## Kluwer Competition Law

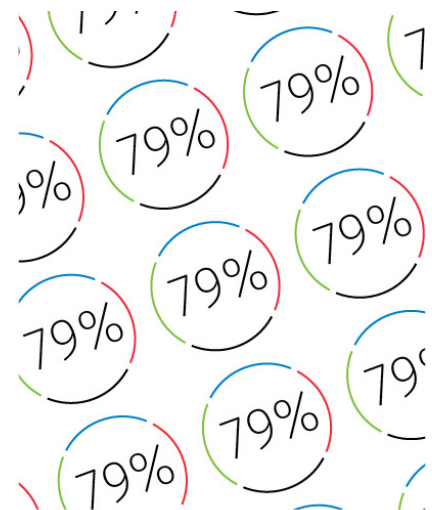
The **2022 Future Ready Lawyer survey** showed that 79% of lawyers are coping with increased volume & complexity of information. Kluwer Competition Law enables you to make more informed decisions, more quickly from every preferred location. Are you, as a competition lawyer, ready for the future?

Learn how **Kluwer Competition Law** can support you.

---

79% of the lawyers experience significant impact on their work as they are coping with increased volume & complexity of information.

**Discover how Kluwer Competition Law can help you.**  
Speed, Accuracy & Superior advice all in one.



2022 SURVEY REPORT  
The Wolters Kluwer Future Ready Lawyer  
Leading change

This entry was posted on Tuesday, July 10th, 2018 at 10:04 am and is filed under [Bulgaria](#), [Media](#), [Sector inquiries](#)

You can follow any responses to this entry through the [Comments \(RSS\)](#) feed. You can leave a

---

response, or [trackback](#) from your own site.