## Comments of the Salt Lake Film Society To the U.S. Department of Justice, Antitrust Division Regarding Review of Paramount Consent Decrees October 3, 2018

We respectfully ask that you maintain the protections set forth in the Consent Decrees by the Supreme Court in *United States v. Paramount Pictures*.

Consent decrees are more necessary than ever before. Changes in the film industry highlight the ongoing justification for the prohibition on block booking. Imposing block booking requirements on exhibitors would hinder our ability to show films based on consumer demand. The repeal of the prohibition on block booking could reduce competition and incentivize anti-competitive behavior, causing further harm to the smallest players in our industry, typically the Mom and Pop shops and the non-profit community arts organizations that give this country a depth of diverse choices.

As John Fithian, president of the National Association of Theatre Owners, et. al, recently said in NATO's Comment filed with the DOJ:

The strength of the American movie industry depends on the availability of a wide assortment of films catering to the varied tastes of moviegoers. Indeed, both global blockbusters and low-budget independent fare are necessary to the financial vitality and reputation of the American film industry. The removal of the prohibition on block booking threatens to undo this system that has enabled our film industry to thrive. If distributors can engage in block booking, exhibitors may be forced to pack their screens with global tentpoles at the expense of targeted programming. Consumers will face increasingly limited choices at the box office, and, without the possibility of a theatrical run, many films will no longer be made, limiting the availability of choices through home entertainment platforms as well. [Emphasis mine.]

The prohibition of block booking supports pro-competitive practices that give small, independent theatre owners and distributors at least a fighting chance to continue to provide beautifully-crafted storytelling and small, important films of artistic merit to those who wish to enjoy them.

I am available to discuss how changes to the Consent Decrees would have disastrous implications for small, independent theatres such as ours.

Thank you for the opportunity to submit our comment.

