

From: [REDACTED]
To: [ATR-LitIII-Information](#)
Cc: [REDACTED]
Subject: Comments Regarding The Review of Paramount Consent Decrees
Date: Thursday, October 4, 2018 11:36:27 PM

I'm respectfully submitting the following comments [REDACTED]
[REDACTED] in response to the US Department of Justice Antitrust Division's review of the Paramount Consent Decrees.

The Rouman Amusement Company, Inc is an independent, family owned movie theater circuit which owns and operates ten screens in two locations in Rhinelander, Wisconsin (population 7,589) and is celebrating 97 years of business in 2018.

[REDACTED]
[REDACTED]

I believe that removing the Decrees would have a profoundly negative impact on smaller theater owners like myself, for the following reasons:

Price Fixing: Theater owners should be free to set our own ticket prices since we know our local market conditions best. In my region of northern Wisconsin with a lower median income and residents with less disposable income, the possibility of an arbitrarily assigned minimum ticket price mandate could result in higher admission prices in order to maintain our currently established business model. This could significantly affect the number of times our residents are willing to visit and/or the amount they are willing to spend in our facilities.

Overbroad Clearances: While I currently do not have direct competition in my smaller market, the idea of wider regional clearances would be of great concern. The regular availability of studio content to play on our screens is our business, and this must be maintained. We already contend with existing practices such as the requirement of playing titles for a minimum number of weeks (which can restrict the amount of other content a smaller facility can show) and limited print runs (which can eliminate smaller communities from playing a title due to lack of market size and/or lower screen counts).

Block Booking: As the owner/operator of a small-market theater with only six screens, the requirement of playing an entire slate of titles (or even just a few) from one studio/distributor would reduce my ability to provide content effectively to my market and maximize revenue. There are many more studios or "distributors of content" now since the Decrees came into existence and if this prohibition was removed it would be impossible for me to offer effectively varied programming to my market. In addition, I fear that some content forcibly programmed in this way may not be appropriate for certain markets. There is much more diversity in content created today to meet global or regionalized demand, but we should be free to identify appropriate content and program it accordingly.

Studios/Movie Distributors Owning Theaters: If studios/distributors/content-creators are allowed

to own theaters it could create an environment where those locations would be preferred and/or given more favorable terms. It could potentially eliminate the ability of some titles to be released wider to smaller markets like mine, or to even be released outside of their own locations at all.

Finally- many small town theaters remain in existence today due to these protections. If the Decrees were removed and these theaters were forced to close, it would leave many small towns across the country with no movie theater at all. With the constant consolidation in our industry resulting in fewer small circuits, it's highly unlikely that any larger circuits will enter these very small markets – and the theaters will be lost.

I respectfully urge you to maintain the enforcement of the Paramount Consent Decrees.

Best Regards,

[REDACTED]

Rouman Amusement Company, Inc.

Rhineland, WI

[REDACTED]

[REDACTED]

[REDACTED]

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