[AM] CTR sanctions broadcaster for transmitting films without the necessary rights and failing to ensure Armenian-language accessibility

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On 26 September 2025, the Commission on Television and Radio of the Republic of Armenia (CTR) adopted Decision No. 114-A, imposing administrative fines on broadcaster Dzagedzor TV LLC for repeated infringements of the Law of the Republic of Armenia on Audiovisual Media (Audiovisual Media Law). The broadcaster was found to have transmitted foreign films without documents certifying the right (authorisation of the holder of copyright or related rights) to broadcast them and to have failed to accompany foreign-language films with an Armenian translation, as required by the Audiovisual Media Law.

During a monitoring exercise conducted between 28 July and 1 August 2025, the CTR identified that Dzagedzor TV LLC had broadcast eight foreign-language films – Guns Up, The Unholy Trinity, A Complete Unknown, Karate Kid: Legends, M3GAN 2.0, Dangerous Animals, Mikaela, and Neighborhood Watch – without Armenian translation, dubbing or subtitling. The broadcaster also admitted that these films had been transmitted without any documents confirming the right to broadcast them. No further explanations or justifications were submitted during the administrative proceedings.

The CTR found that the broadcaster had violated Article 6(1) and (2) of the Audiovisual Media Law, which requires that audiovisual information be provided in Armenian (except as otherwise permitted by the Audiovisual Media Law) and that foreign-language programmes be accompanied by an appropriate Armenian translation (dubbing, voice-over or subtitles). It also held that the broadcaster had breached Article 10(3) of the Audiovisual Media Law, which permits the transmission of audiovisual programmes not owned by the broadcaster only if there are documents confirming the right to broadcast them.

Referring to the Law on Copyright and Related Rights (Articles 39(1) and 65(1)), the CTR reaffirmed that any use of protected works required prior authorisation from the rights-holder. In view of the evidence and the broadcaster's written acknowledgment, the CTR concluded that Dzagedzor TV LLC had unlawfully transmitted copyright-protected films in a foreign language without an Armenian translation.

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Since the same broadcaster had been warned for similar violations within the previous year, the CTR considered these acts repeated infringements under Articles 56(1) and 57(2), (14) and (31) of the Law on Audiovisual Media. Consequently, it imposed two administrative fines:

- 112 910 Armenian *dram* (AMD) for the repeated violation of Article 10(3); and

- AMD 600 000 for the repeated violation of Article 6(1)–(2).

The CTR emphasised that broadcasters bore editorial responsibility for ensuring compliance with copyright and language requirements and that repeated disregard of statutory obligations would attract progressively stricter sanctions.

ՀՀ հեռուստատեսության և ռադիոյի հանձնաժողովի 2025 թվականի սեպտեմբերի 26-ի թիվ 114-Ա որոշում

https://tvradio.am/wp-content/uploads/2025/09/114-Ա.pdf

Decision No. 114-A of 26 September 2025, Commission on Television and Radio of the Republic of Armenia

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