

CHILE

INTERNATIONAL INTELLECTUAL PROPERTY ALLIANCE (IIPA) 2011 SPECIAL 301 REPORT ON COPYRIGHT ENFORCEMENT AND PROTECTION

Special 301 Recommendation: IIPA recommends that Chile remain on the Special 301 Priority Watch List in 2011.

Executive Summary: The copyright industries are very concerned about inadequate legal reform and high piracy levels in Chile. Amendments to the copyright law adopted May 4, 2010, show some promising developments for efforts to address online piracy, but generally do not meet the standards required for proper implementation of Chile's FTA copyright protection and enforcement obligations, now several years past due. Hard goods piracy remains at steady levels while Internet piracy continues to grow, a major obstacle for the development of a new digital economy. Industry cooperation with Chilean copyright enforcement authorities generally is good; however, additional resources are still needed to address the low number of street actions, and increased attention on the part of the judiciary is needed to follow through on the positive efforts of the Carabineros and Civil Police. At the end of the day, few copyright prosecutions are undertaken and even fewer result in deterrent sentencing, due largely to inadequate minimum penalties in the law.

The first U.S. trading partner in Central and South America to sign a Free Trade Agreement (FTA) with the United States, Chile has ignored key deadlines for implementation of its FTA obligations. Despite several years of work on copyright- and enforcement-related legislation, the resulting amendments take steps to establish a new voluntary notice system to address online piracy, but on the whole fail to establish adequate tools for the copyright industry and enforcement authorities to enforce against the full spectrum of infringement, especially in the online environment. Nor do the amendments address Chile's FTA obligations on Technological Protection Measures ("TPMs"), a deadline long overdue. Overall, significant changes are needed to improve the legislative protections and enforcement measures for copyrighted works in Chile.

PRIORITY RECOMMENDED ACTIONS FOR CHILE IN 2011¹:

- Further amend the copyright law to fully satisfy FTA obligations with respect to: effective Internet Service Provider (ISP) liability provisions, deterrent-level civil and criminal sanctions for copyright infringement, an effective civil *ex parte* search remedy, and the establishment of statutory damages.
- Satisfy FTA and WIPO Internet Treaties obligations to adopt TPMs legislation and enforce anti-circumvention provisions (both criminal and civil).
- Take immediate steps to complete and fully implement the 2001 government software legalization decree, and adopt provisions to regulate the acquisition and management of software by government agencies.
- Through increased resources and coordination, place greater priority among administrative and enforcement authorities on anti-piracy actions, particularly on the Internet and in the streets of Santiago.
- Improve the speed of civil copyright infringement litigation and afford an effective and TRIPs-compliant civil *ex parte* search remedy, both in the law and in-practice.
- Launch a national Internet anti-piracy campaign led by the Ministry of the Interior, setting goals for specific enforcement efforts, improved interagency cooperation, regular reporting on administrative and judicial Internet actions, and enhanced public awareness.
- Strengthen border enforcement with better tracking mechanisms and coordination with rights holders.

¹For more details on Chile's Special 301 history, see IIPA's "History" appendix to this filing at <http://www.iipa.com/rbc/2011/2011SPEC301HISTORICALSUMMARY.pdf>, as well as the previous years' reports, at <http://www.iipa.com/countryreports.html>. For a summary of IIPA's 2011 global issues, see our cover letter at <http://www.iipa.com/pdf/2011SPEC301COVERLETTER.pdf>.



COPYRIGHT PIRACY IN CHILE

Widespread “street piracy” has not abated in Chile, and illegal downloading is pervasive and largely unchecked. Although the country is emerging as a sophisticated digital market (broadband is now available to 50 percent of the population, according to www.internetworldstats.com), without effective anti-piracy mechanisms to keep pace with the increase in Internet users and available bandwidth, legitimate online distributors of copyrighted materials face enormous challenges. Internet piracy takes the form of illegal hosted sites, peer-to-peer (P2P) files sharing of infringing content, illegal use of cyberlockers, hyperlinks to infringing materials and, increasingly, illegal mobile and smart phone downloads.

Optical disc piracy, street piracy and border issues: As most of the pirate music consumers in Chile have migrated to the Internet, today street vendors (“*ambulantes*”) primarily sell DVD’s containing movies and music videos. The recording industry, however, reports that optical discs still face a 50% piracy rate of the total market in Chile. Vendors cover their pirate wares with big towels printed with the cover image of movies, games, music, or software. A buyer asks for the product, the seller makes a phone call, and in a few minutes a runner appears with the pirated product. Police actions against the street vendors are frequent but produce only transitory changes in the street piracy situation. The film, music and business software industries continue to report a recent development in street piracy, called “in-house piracy.” This trend in Chile is driven by street purchasers who seek illegal copies of films, games, and software from individuals with access to copying equipment at work. These in-house vendors use catalogues distributed by email or on paper, receive the requests, fulfill orders and then receive payment from a distributor. Finally, Chile is a major port of entry for blank optical disc media coming from Asia. The illegal importation and smuggling of pirate goods from Peru seriously affects the northern cities of Arica, Iquique, and Antofagasta. Some products are imported through the Port of Iquique, falsely identified, and re-exported to other countries.

Business software piracy: The Business Software Alliance (BSA) reports that, overall, business software piracy neither rose nor fell in Chile during 2010. End-user piracy (the unauthorized use and copying of software by businesses and other enterprises) remains a problem and currently causes the greatest damage to the business software market in Chile. Other significant forms of software theft include unauthorized pre-installation of software by hardware retailers, in-house and external IT advisors who often load unauthorized copies of software onto computers or networks, and Internet piracy. The PC software piracy rate in Chile remained steady in 2010 at 64%, based on preliminary data.² This translates to a commercial value for pirated U.S. vendor software of \$161 million.

Because end-user piracy of business software occurs in public agencies as well as private businesses, adopting appropriate provisions to regulate the acquisition and management of software by the government is a critical solution, and one required by the FTA. The new administration in Chile has the opportunity to complete and fully implement the 2001 government software legalization decree. In 2011, BSA plans to increase the number of cease and desist letters it issues and also run more judicial raids at commercial and educational organizations in order to produce more awareness about the need to protect software and halt piracy.

Piracy of music and sound recordings: The recording industry, led by its national group (IFPI Chile), reports that the level of piracy of optical discs remains stable at 50% of the market, while online music piracy is growing. Physical piracy, primarily in the form of pirate CD-Rs and DVD-Rs, is highest in the cities of Santiago, Concepción, Iquique, and Valparaiso. Internet piracy is growing quickly, now exceeding the hard goods problem significantly, as legitimate sales of physical product decline. There were over 8.36 million Internet users in Chile in

²BSA’s 2010 statistics are preliminary, representing U.S. software publishers’ share of commercial value of pirated software in Chile. They follow the methodology compiled in the Seventh Annual BSA and IDC Global Software Piracy Study (May 2010), <http://portal.bsa.org/globalpiracy2009/index.html>. These figures cover packaged PC software, including operating systems, business applications, and consumer applications such as PC gaming, personal finance, and reference software – including freeware and open source software. They do not cover software that runs on servers or mainframes, or routine device drivers and free downloadable utilities such as screen savers. The methodology used to calculate this and other piracy numbers are described in IIPA’s 2011 Special 301 submission at www.iipa.com/pdf/2011spec301methodology.pdf. BSA’s final piracy figures will be released in mid-May, and the updated US software publishers’ share of commercial value of pirated software will be available at www.iipa.com.

2010 (according to www.internetworldstats.com), but the market for digital music is nearly out of reach for the recording industry. Internet piracy is estimated at 90% of all music consumption in the country. The majority of legitimate music sales over the Internet are downloaded to smart phones. IFPI Chile reports that the recording market for physical copies in Chile suffered a decrease of 1% in 2010. In turn, digital sales increased by 18% mainly due to "mobile" music consumption. Digital sales to computers continue to be heavily affected by piracy, especially via P2P exchanges and links posted on blog, social, and forum websites.

The most common form of Internet piracy is the exchange of illegal files through P2P networks (especially ARES, Gnutella and Limewire) and links to cyberlockers containing infringing content posted on social sites such as Chilecomparte. Pirated copies on the Internet are readily available for download and are used as source materials to burn CDs/DVDs for distribution in the streets. During 2010, ESA vendors detected more than one million connections by peers participating in unauthorized file sharing of select member titles on P2P networks through ISPs located in Chile.³ Breakdowns by ISP show that Terra Networks Chile S.A. and VTR Banda Ancha S.A. subscribers account for approximately 65% of this activity occurring in Chile.

The recording industry estimates that about 25% of all downloading and burning is done in Internet cafés. It is addressing this problem by working with local cyber-crime units to raid Internet cafés contributing to illegal downloads, and is considering alternative actions against individual uploaders.

Another growing problem is the cyber links posted on forums and social sites. A clear example of this is the site "Chilecomparte," one of the most popular social communities on the Internet in Latin America, which allows registered users to post and exchange thousands of music files. Three years ago, IFPI Chile submitted the case to the competent authorities for criminal investigation; the Special Prosecutor's Office has not pursued it. Today Chilecomparte remains the biggest threat to the music industry in Chile because of the thousands of illegal music links posted in its musical communities.

Camcord piracy: In 2008, the Motion Picture Association (MPA) also saw the first pirated videos to originate from illegal filming in Chilean movie theaters. Known as camcord piracy, this activity was the subject of trainings subsequently conducted for cinema employees on how to spot illegal camcording among moviegoers. MPA is currently supporting a case against an individual arrested in 2009 for camcording in a Chilean theater.

The independent film and television segment of the motion picture industry (IFTA) reports that online and physical piracy remains a significant export constraint for independent producers and distributors, the majority of which are small- to medium-sized businesses. Independent producers partner with local authorized distributors to finance and distribute their films and programming. These authorized distributors find it almost impossible to compete with the pirates. Producers and distributors confirm that DVD sales have been particularly impacted since pirated digital copies are offered for free online and with the same quality viewing experience as a DVD. Unable to compete with free, legitimate distributors are unable to commit to distribution agreements or offer drastically lower license fees which are inadequate to assist in financing of independent productions.

COPYRIGHT LAW ISSUES IN CHILE

A much anticipated set of amendments to the copyright law went into effect in May 2010, addressing two areas of high importance to rights holders: ISP liability and deterrent criminal penalties. The ISP liability provisions of the new legislation provide a mechanism for a voluntary notice system, and rights holders are monitoring how this system will be tested in the courts. Judicial review requirements for the ultimate removal of infringing content have the potential to undermine the effectiveness of the law. Unfortunately, in other key areas, the legislation was a step backward in efforts to bring copyright protection and enforcement in Chile into the digital era. Also, while maximum

³These figures do not account for downloads that occur directly from hosted content, such as games found on "one-click" hosting sites, which appear to account each year for progressively greater volumes of infringing downloads.

criminal penalties for repeat offenders were increased to deterrent levels, minimal levels are still available and continue to be favored by Chilean judges. The law establishes a number of exceptions and limitations to copyright that could undermine important copyright protections, and fails to resolve gaps in copyright protection and enforcement in areas including *ex parte* searches and statutory damages. Provisions for the protection of TPMs have not been adopted. Finally, government software legalization has not been adopted. Given each of these shortcomings, Chile is not in compliance with its FTA obligations.

The U.S.-Chile FTA:⁴ Since the U.S.-Chile FTA went into force on January 1, 2004, Chile has failed to meet the bulk of its obligations that were due under a series of transition period deadlines, all of which have passed. Each of the following obligations remains outstanding:

- Provide adequate protection to temporary copies (Articles 17.5.1 and 17.6.1).
- Adopt effective provisions on limitations of liability for ISPs and efficient notice and takedown measures (Article 17.11.23).
- Provide for a right of communication to the public and non-interactive digital transmissions (Article 17.6.5).
- Provide for legal remedies for rights management information (Article 17.7.6).
- Provide for pre-established damages (statutory damages) in civil judicial proceedings (Article 17.11.9).
- Provide for civil remedies, including seizures, actual damages, court costs and fees, destruction of devices and products (Article 17.11.12).
- Provide for various border measures (Articles 17.11.17 through 17.11.21).
- Provide for the protection of technological protection measures (TPMs) and enforce anti-circumvention provisions against circumvention, including preparatory acts (Required by FTA Articles 17.7.5.a and c, as well as the WIPO Internet Treaties).

IIPA and its members strongly support the FTA and for many years have urged Chile to fully and promptly comply with its FTA and international obligations.⁵

Copyright law reform adopted in 2010: Chile has been working on legislation to amend its copyright law since 2007 to address some (but far from all) of the FTA issues cited above. Local copyright industry representatives repeatedly raised concerns with Chilean officials and Members of Congress over the years that followed, yet the text originally drafted by the Ministry of Culture moved through the Senate and the House largely unimproved. The Constitutional Court approved amendments to the Chilean Copyright Law on March 31, 2010. The amendments entered into force as Law No. 20.435 upon publication in the Official Journal, dated May 4, 2010. As adopted, the amendments contain significant gaps in the following areas:

- ISP liability: Chile's copyright law as amended creates a "notice plus notice" architecture for hosted content that lacks the threat of any real consequences for typical online piracy, falling short of the "notice and takedown" procedures required by the FTA (the taking down of material is currently only possible with court involvement). It also fails entirely to deal with piracy over P2P networks, a prevalent form of piracy in Chile. Specifically:
 - Chapter III on "Internet Service Providers Limited Liability Provisions" generally tracks the safe harbors in the FTA (articles 85-L to 85-N). However, the new law requires that ISPs have "effective knowledge" before voluntarily removing infringing content – and under Article 85-N such knowledge must be based on notification from a court of law rather than from a right holder. This structure

⁴The U.S.-Chile Free Trade Agreement is posted on USTR's website at http://www.ustr.gov/Trade_Agreements/Bilateral/Chile_FTA/Final_Texts/Section_Index.html. For an earlier review by IIPA of the U.S.-Chile FTA IPR Chapter, see IIPA's Submission to the U.S. International Trade Commission on the U.S.-Chile Free Trade Agreement, May 8, 2003, available at http://www.iipa.com/rbi/2003_May8_ChileFTA_ITC.pdf.

⁵Past IIPA Special 301 submissions have detailed the history of Chile's FTA implementation, and are available at <http://www.iipa.com/countryreports.html#C>.

severely limits the possibility of the voluntary cooperation between ISPs and rights holders that is needed for an effective response to online piracy.

- Article 85-O requires ISPs to have a contractual policy to cancel the subscriptions of infringers, but only when those subscribers have been convicted twice for copyright infringement. Considering the infrequency of prosecutions in Chile, this condition will likely never be met in reality, and is unlikely to have any deterrent effect.
- Article 85-U requires ISPs to inform subscribers of notifications from rights holders within five days of receipt, but the law fails to ensure compliance with this notification requirement through any incentives or penalties.
- No civil *ex parte* remedy or statutory damages: No provisions are included to strengthen the civil *ex parte* search remedy, nor are there any provisions establishing statutory damages.
- Overbroad exceptions to protection: The law as adopted contains certain exceptions that appear to be incompatible with the FTA. For example, provisions on reverse-engineering are too broad: the exception is not limited to the circumvention of TPMs, does not cover research and development activities within that exception, and is not restricted to achieve interoperability (which is the FTA standard). Exceptions involving libraries could allow libraries to reproduce entire works in digital form without any restrictions on further use, reproduction or distribution. Finally, all enumerated exceptions and limitations to Chile's copyright provisions must be consistent with the three-step test set forth in the FTA, ensuring that exceptions and limitations are not overbroad.⁶
- Low minimum criminal sentences: As adopted, the amendments achieve new maximum prison sentences and fines, which can reach US\$140,000 (2,000 *Unidades Tributarias Mensuales* ("UTMs")) for repeat offenders. The law does not, however, increase the minimum sanctions for infringements. As a result, the copyright industry fears that most judges, who usually apply only the lower limits, will continue to apply these low levels of sanctions. Efforts in separate legislation (discussed below) may go part of the way toward implementing more deterrent criminal sanctions for piracy. Sanctions should clearly apply in cases involving Internet piracy, especially involving those who upload protected copyrighted materials.
- No protection for Technological Protection Measures: Rights holders remain extremely disappointed that Chile continues to ignore its obligation under Article 17.5 of the FTA to provide adequate legal protection for TPMs used to control access or otherwise restrict unauthorized acts with respect to a protected work.

Trans-Pacific Partnership FTA: Chile is an initial TPP negotiating partner. IIPA views the TPP negotiations as an opportunity to make progress on Chile's outstanding IPR obligations under the U.S.-Chile FTA.

COPYRIGHT ENFORCEMENT IN CHILE

The copyright industries report good cooperation with Chilean criminal and civil enforcement authorities. However, additional resources are needed to raise street actions to an effective level, and increased attention on the part of the judiciary is needed to follow through on the positive efforts of the Carabineros and Civil Police. Authorities need to take enforcement actions with greater frequency against Internet sites distributing infringing products. Prosecutions for copyright crimes are too infrequent and rarely result in deterrent sentencing, and civil actions face procedural obstacles and delays.

⁶Specifically, Article 17.7(3) of the U.S.-Chile FTA provides that "Each Party shall confine limitations or exceptions to rights to certain special cases which do not conflict with a normal exploitation of the work, performance, or phonogram, and do not unreasonably prejudice the legitimate interests of the right holder."

Along with the priorities found in the Executive Summary, IIPA highlights these additional recommended enforcement actions for 2011:

- Instruct the police (Carabineros) to give priority to copyright anti-piracy actions, especially in the cities of Santiago, Iquique, Concepción, and Valparaiso.
- Instruct the civil police and administrative authorities to take actions prohibiting the sale of pirated materials in the streets of major cities.
- Assign more resources to the cyber-police departments of Carabineros and Civil Police in order to double the number of Internet anti-piracy actions.
- Create a coordination authority in the Finance Ministry in order to coordinate all efforts against Copyright Piracy in the country, especially among customs, international airports, seaports, border areas (free-zones), and private sector organizations.
- Pursue more prosecutions and impose deterrent-level criminal sentences.
- Chilean Customs should establish a system to track blank optical media imports, coordinate with rights holders to ensure accurate invoicing, limit the entry of blank media, institute a reference price for CDRs and DVD-Rs, and create an approved importers' register.

Public-private cooperation: The local anti-piracy coalition (known as CONAPI, Comisión Nacional Anti-piratería) was created in 2001 and is composed of members of both the private sector and public agencies. Its 20+ members include the sound recording, software, publishing and audiovisual industries, and maintain a close relationship with the local chamber of commerce. Tax and customs authorities participate as non-voting observers in order to remain current on industry concerns. CONAPI played a useful role in its first years, promoting more anti-piracy actions and calling the attention of the government to major issues affecting copyright industries in Chile. However, in recent years CONAPI lost energy and became a forum for rhetorical discussions. In particular, CONAPI failed to address the concerns of the copyright industries in the recent Intellectual Property Law reform, and does not adequately address the Internet Piracy problem.

Inadequate civil *ex parte* actions and slow civil cases: Inadequate preparation and training on intellectual property issues for many judges and their staff remains a major problem, along with weak civil provisions. Although the problem has diminished slightly over the years, there is much room for improvement to raise the capacity of the judiciary to understand the nature of copyright cases. BSA believes that this incremental improvement is due to continued training and public awareness that all the industries are providing in Chile, as well as better information among Chilean agencies about their international and bilateral trade and intellectual property obligations.

BSA continued to bring only civil actions in Chile last year, conducting almost 50 actions in 2010. Civil *ex parte* actions are a critical remedy for the business software industry. BSA reports that in 2010, Chilean judges continued to improve their response to civil complaints and accepted more BSA requests for *ex parte* raids, which is a commendable achievement. However, despite this progress, BSA is still struggling with a very difficult provision of Chilean law regarding *ex parte* proceedings in civil cases. When *ex parte* search requests are filed, they are registered in a public electronic register, where target companies may learn about a search request before the inspection takes place. This notice violates TRIPS Article 50, and it undercuts the effectiveness of the remedy. BSA continues to move forward on this issue and is hopeful that with the new copyright law, the judges (including the judicial police's IPR branch, BRIDEPI) are improving their understanding of IP issues and software piracy specifically.

Criminal anti-piracy enforcement: There are three overwhelming problems in getting effective criminal enforcement in Chile. First, the national police (Carabineros), the Prosecutor's Office and the Judicial Police suffer from a lack of sufficient human resources. The Carabineros, particularly the organized crime investigations department, continue to be a major support for anti-piracy actions in Chile. However, raids are limited to requests from rights holders. Second, the IPR prosecutor's office is not dedicating the time and resources to understand and build Internet piracy cases, while the National Prosecution Office lacks a special branch to investigate intellectual property cases. Finally, even with higher penalties available under the 2010 amendments, judges continue to impose

the minimum available penalties, which are not deterrent. Under the new Chilean Criminal Procedure System, judges continue to follow the principle of *in dubio pro reo* ("when in doubt, for the accused"), typically preferring the lower of the range of penalties. Compounding the problem, the Criminal Procedures Code and the Penal Code treat copyright piracy as a misdemeanor, empowering prosecutors to enter into agreements with the accused to effectively substitute community services and a probationary period for criminal penalties. The General Attorney's office needs to prioritize copyright cases and instruct prosecutors to file criminal charges in important infringement cases.

The recording industry has an active criminal anti-piracy campaign in Chile, but reports disappointing results in 2010. The recording industry's anti-piracy group (IFPI Chile) assisted the police last year and reports that hard goods raids continue to be focused in Santiago and Valparaiso. Most of these raids are requested by the industry rather than being initiated by the local authorities. Flea markets such as Bio-Bio in the outskirts of Santiago are still plagued with pirate product. There have been more than 20 procedures with the direct participation of IFPI. The police are taking *ex officio* actions in cases of street piracy and some laboratories. Customs also works on its own but eventually requests a complaint from the right holders. The recording industry reports that 177 raids on physical piracy were carried out during the year (slightly more than the previous year), and 296,340 pirate copies along with 2,010 CD/DVD burners were seized in the operations. However, police operations rarely result in the arrest of responsible individuals and almost never in effective prosecutions. One individual was arrested and only two individuals were convicted in 2010 for music piracy. These figures reflect the very weak attention of Chilean authorities to the piracy problem.

Internet piracy and cybercrime cases: Chile's Judicial Police created a specialized, dedicated force to investigate Internet crimes. The Cyber Crime Brigade has been active and helpful on many Internet anti-piracy actions, but obtaining follow-through by prosecutors remains difficult. During 2010, through the efforts of IFPI Chile, a total of 143,231 infringing cyberlocker links, 1,991 P2P links and 1,029 forums post were removed. 457 pirate products were also removed from virtual auction sites and 2,318 pre-release music files were removed. As with physical piracy, the industry hopes to continue fighting piracy through local teams. The Specialized Prosecutor's Office continues to show very little interest in prosecuting the social site Chilecomparte for its dedicated pirate music and video components, despite the fact that Chilecomparte is the biggest local online source for unauthorized distribution of pirate music.

The entertainment software industry indicates that www.h2zone.cl, which is hosted in Chile, is a leading purveyor of circumvention devices, such as game copiers and mod chips. Because Chile lacks adequate legal protection for TPMs, remedies against such distributors are unavailable. Unfortunately, the easy availability of circumvention devices serves as a catalyst for further online piracy, as such devices are needed for games illegally downloaded from the internet to play on a game console.

ISP cooperation: With respect to online hosted infringing content, the recording industry reports that the voluntary notice procedures implemented in the recent copyright law amendments are working adequately to foster cooperation between rights holders and ISPs in cases where content is hosted on the ISP's server. These provisions have just begun to be tested with the first wave of notifications in early 2011, and the willingness of enforcement authorities to reinforce ISP cooperation will be crucial in this effort. In the meantime, no cooperation from ISP's is provided against P2P exchange.

Inadequate border enforcement: Chile's Iquique port is a transshipment point for blank media from Asia entering Colombia, Peru and Bolivia. The main problem that occurs is smuggling. In addition, the northern cities of Arica, Iquique and Antofagasta often serve as an entry point for blank optical disc media that is coming from Southeast Asia. To better track imports of blank media, the government should establish a customs policy whereby all blank CD shipments must pass through "red light" proceedings. This procedure would require that every shipment of optical media be inspected for price and classification accuracy as well as legitimacy of exporters and importers. To simplify such an operation, Chilean Customs may want to consider limiting the number of ports of entry for blank optical media, as in programs already implemented in Mexico and Paraguay. The creation of an importers' register

would also improve disclosure; such a system should also involve rights holders. There was no progress at all on these issues last year, and the interested industry will be reevaluating their strategy on this issue in view of the new government in Chile.

Trainings: The copyright sectors stand ready to provide trainings to Chilean enforcement personnel. Specifically, BSA has twelve years of experience conducting software anti-piracy actions in Chile and is prepared to work with the competent authorities there to combat copyright infringement. The local music recording industry group, IFPI Chile, regularly participates in training seminars for Carabineros and the Civil Police.