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**Revision of the activities classification:
Comments on the ISIC Rev 4. draft**

Magali Demotes-Mainard, INSEE, France
magali.demotes-mainard@insee.fr

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SUMMARY

During the second quarter of 2004, INSEE and the French Government statistics services organised a series of consultations with the representatives of professional organisations to find out their opinion on the detailed ISIC draft, and to prepare for the discussions on the revision of the NACE and its French version.

This document presents the main points raised on this occasion in the market services sectors within sections G (trade), J (accommodation and food services), K (information and communication), M (real estate, rental and leasing activities), N (professional, scientific and technical activities), O (administrative and support services), R (arts, entertainment and recreation) and S (other services) of the May 2004 draft.

1. Trade (section G)

Trade and repair of motor vehicles (division 42)

1.1 Professionals in the sector are satisfied this division is being maintained. They are not worried about the exclusion of the retail sale of fuel since this activity is separate within retail trade. To improve the proposal, they would like the trade and repair of motor vehicles other than private vehicles (lorries, coaches, buses, etc) to be separated from activities related to private vehicles, in the same way as a specific class exists for the trade and repair of motorcycles. In the current state of the draft, this would require two new subclasses:

- the distinction between the trade of cars and the trade of other motor vehicles,
- the distinction between the repair and maintenance of cars and the repair and maintenance of other motor vehicles.

They would be happy with these two subclasses, even though they would prefer the trade and repair of these other vehicles to be grouped in the same class since these two activities are often associated.

The professionals are not asking for the distinction to be made between wholesale trade and retail trade for motor vehicles, but would like to maintain this distinction, which exists in the French classification, for motor vehicle parts and accessories.

Proposal:

42 Trade and repair of motor vehicles and motorcycles

421 sale of private cars

4210 sale of private cars

422 repair and maintenance of private cars

4220 repair and maintenance of private cars

423 sale and repair of other motor vehicles

4230 sale and repair of other motor vehicles

424 sale of motor vehicle parts

4241 wholesale of motor vehicle parts

4242 retail sale of motor vehicle parts

425 sale and repair of motorcycles and parts

4250 sale and repair of motorcycles and parts

Wholesale trade (division 43)

1.2. The first comment, supported by several professional organisations, relates to the title of this division, deemed to be out of date and which leads to misunderstandings as it does not reflect current practices. The professionals would like it to be replaced by, or at least include, the words "Inter-business trade" or "business to business trade", which corresponds better to the definition of the content of this division, as defined by the explanatory notes.

Proposed title for division 43 and its various subdivisions:

"Inter-business trade" or "Business to business trade" instead of "Wholesale trade"

1.3. The jewellery, clocks and watches professionals would like their wholesale trade activity to be differentiated by a specific class, including on an international level: due to offshoring, in France imports outweigh manufacture which currently has a specific class in NACE. This would allow a better overview of the whole jewellery, clocks and watches industry.

This comment suggests that in general, it should be ensured that the breakdown of industrial activities and that of inter-business trade (which includes importers) remain consistent for products where imports supply a large proportion of the domestic market.

1.4. The creation of group 436 "wholesale of electronic and telecommunications parts and equipment", which includes the wholesale of ICT goods divided in current classifications, was generally approved.

- 1.5. Without citing a specific class, the professionals raised the question about the distinction between trading activities for new products and those relating to second-hand goods. They stressed that the latter activity is gaining in size and that it differs from the wholesale trade of new goods in that it proceeds in line with supply and demand, and is not based on ranges.

Retail trade

- 1.6. In France, within the retail sale in non specialised stores with food predominating class, there is a fairly general agreement to differentiate between the various activities according to the sales area of the stores, using a three-level split: mini-markets, supermarkets and hypermarkets. Some (but not all) professionals would however like to increase the size thresholds which are the current references (120 m², 400 m² and 2 500 m²).

However, this request only relates to the national level: given the risk of adopting a different segmentation on a European or international level, the professionals do not want the retail sale in non specialised stores with food predominating class to be divided up any further for the NACE and the ISIC.

In particular, the professionals represented do not want a division which would isolate hard discount stores: to them, their definition is based on a subjective assessment of the marketing policy, which is also not of a perpetual nature.

- 1.7. Given not only the decline in this activity but also its specialisation (generally focussed on household textiles and furnishing fabrics), the French professionals believe that the retail sale of textiles would be better placed alongside the retail sale of household goods rather than the retail sale of personal consumer goods. Within the same logic aiming to differentiate between personal items and household items, the sale of haberdashery items should also come within household goods.

Proposal:

- 4441 remove the retail sale of textiles and haberdashery, knitting and embroidery items*
4444 include the retail sale of textiles and haberdashery, knitting and embroidery items

- 1.8. The draft lists the retail sale of wallpaper and floor coverings under item 4469 "other retail sale in specialised stores": this activity would sit very naturally in class 4443 "Retail trade of hardware, paints and glass", alongside the sale of paints, lacquers and varnishes.

Proposal:

- 4443 include the retail sale of wallpaper and floor coverings*
4469 remove the retail sale of wallpaper and floor coverings

- 1.9. Professionals and statisticians believe that the proposed split into four classes of the retail sale of high-tech equipment and related goods (computers and software / telecommunications equipment / audiovisual equipment / music and video recordings) will cause boundary problems, given the likely changes in digital technologies. Furthermore, the size of some of the resulting isolated sectors (given that it covers specialised stores only) may be small. A split into a maximum of two classes appears preferable:

- computers, software and telecommunications equipment;
- audiovisual equipment, music and video recordings.

Proposal:

- 445 retail sale of high-tech equipment and related goods in specialised stores*
4451 retail sale of computers, software and telecommunications equipment
4452 retail sale of audiovisual equipment and music and video recordings

The same reasons lead to the proposal to group the repair and maintenance of computers and communications equipment together.

Proposal: a single class in group 851
8510 repair and maintenance of computers and communication equipment

1.10. Furthermore, telephone outlets which are increasing in number with the rise of the mobile telephone achieve most of their turnover from the sale of contracts, even if they also sell telephones and associated equipment. Some of these shops depend directly on telecommunications companies, but others may be independent and receive commission for the contracts they sell. In this case, where should these units be classified? In the current classification, in which section G (Trade) is limited to transactions relating to goods, these units would undoubtedly be classified either in "other reservation services" (7220) or "other support activities" (7539).

1.11. Concerned professionals are satisfied that it is proposed to separate the retail trade of sports goods in the ISIC: the content of the class, which also includes leisure equipment, is globally suitable. It is important that this class also covers hunting and sporting firearms, which come under "other retail sales in specialised stores" in the draft.

Proposal:
4463 include hunting and sporting firearms
4469 exclude hunting and sporting firearms

1.12 Regarding retail sales not in stores, the large overlap (current and future situation) between retail sales by mail order and retail sales by Internet was brought to light: there is a general agreement to request these be grouped into a single class, even if some units mainly specialise in Internet sales.

1.13. It is important that the notes specify that sales through mail order houses (by normal mail or by Internet) must cover goods so that the units in question are classified in retail sales. However, the current wording of the explanatory notes is slightly ambiguous at present: reference is made to the sale of "any kind of product", which could be applied to the sale (or reservation) of services (hotels, tickets, rental, etc.).

Proposal:
449 retail sales not in stores
4491 mail order
4492 retail sales via stalls and markets
4499 other non-store retail sale

Explanatory notes for class 4491:

This class includes:

- retail sale of any kind of goods by mail order, telephone, over the Internet or any electronic mean. The goods purchased may be physically sent to the buyer or (in case of goods that can be digitalised) downloaded from the Internet.

This class also includes:

- Internet retail auction

The classification of retail sale intermediaries, and more specifically those who operate via Internet only, is not mentioned in the ISIC draft and needs to be stated.

2. Accommodation and food services (section J)

Accommodation (division 51)

- 2.1. The main criteria to distinguish between activities from group 511 (or class 5110) "hotels and similar accommodations" and activities from group 513 (or class 5130) "holiday accommodations" is not clear: for group 511, the explanatory notes focus on the associated services, for group 513 on the possibility of preparing and having lunch and dinner in the rented rooms. Besides, the daily cleaning of the rooms is not mentioned among the associated services although it is an essential characteristic of the hotel accommodation service. The other services are not characteristic of hotel accommodation services and should not be put at the same level.

The possibility of preparing and having meals in the rooms may be the main distinction criteria between those two groups. If so, the mention of the "apartment hotels" in the description of group 511 may appear ambiguous, some of these establishments providing flats with kitchens.

- 2.2. In the ISIC Rev. 4 draft, the explanatory note for the "hotels and similar accommodations" class (5110) states that this class "includes accommodation provided by [...] hotels with spas, hotels with convention facilities, casino hotels [...]". This statement seems unnecessary and does not comply with the principle of not setting a convention and using a value added criterion to classify the units: the notes must describe the accommodation services, not the unit which provides this service, and which may offer its customers several activities. If the wording of the explanatory note of class 5110 is merely ambiguous, insofar as it says it includes the "accommodation service", the wording of the notes of class 8200 is then clearly unsatisfactory since it says it excludes casino hotels, i.e. units are mentioned rather than activities.

To remove this ambiguity, any reference to multi-activity units should be deleted from the explanatory notes, given that the general principle for determining the main activity is sufficient to classify these units in a relevant manner.

Proposal for the explanatory notes of class 5110 "Hotels and similar accommodations":
[...] Units classified here provide furnished accommodation in guest rooms and suites, with daily room cleaning service, sometimes with kitchenettes. They may offer guests a range of additional services such as food and beverage services. [...]
[...] This class includes accommodation provided by:
- hotels
- resort hotels
- motels
- motor hotels.

Proposal for the explanatory notes of class 8200 "Gambling and betting activities":
Delete the reference excluding casino hotels

- 2.3. According to the ISIC draft, the distinction between groups 511 "hotels and similar accommodations" and 512 "inns, pensions and similar establishments" comes from the size of the establishments with group 512 being reserved for "small stand-alone units, generally run by the owner, who lives on the premises". The French terms to describe this type of accommodation are "chambre d'hôtes", "gîtes" or "pensions de famille". However, the word "auberge", which is normally translated by the English word "inn", does not correspond at all to the definition described by group 512: this word is used indifferently in the names of restaurants or hotels (of group 511), generally in a rural location. The French translation of the title of group 512 should therefore not use the term "auberge".

Proposal for the French title of group 512 and class 5120:
"Gîtes et chambres d'hôtes"

- 2.4. The proposal made by the ISIC of separating holiday homes from non tourist accommodation within accommodation other than hotels is welcome.

2.5. Class 5140 of the ISIC draft "recreational vehicle parks, trailer parks, recreational camps and campgrounds" is supposed to cover accommodation units located in reserved sites: in France, this would essentially cover outdoor accommodation and mountain shelters. The problem that we have with this class is therefore essentially linked to its description. The title effectively highlights the recreational nature of the accommodation site, which does not really mean much in a country such as France. However, the reference to outdoor accommodation or in natural surroundings is a good match to the definition given by the explanatory notes, and would most likely suit the actual situation in a larger number of countries.

Likewise, the hierarchy of the items listed in the explanatory note should be reviewed.

Proposal for the title of group 514 and class 5140:
"Outdoor accommodation and in natural surroundings"

Proposal for the explanatory note:
This class includes the provision of space and facilities in campgrounds, recreational camps, fishing and hunting camps, operating trailer parks, for short stay visitors.

In France, it would certainly be desirable to isolate campgrounds within this list. However, it is not possible within campgrounds to differentiate between the provision of pitches only and those for mobile homes or chalets, these two services being increasingly linked.

Food service activities (division 52)

2.6. The current French classification differentiates between two types of restaurant:

- traditional type restaurants, where the customer is served at the table,
- take-away type restaurants, where the customer is served at the counter.

During discussions about the classification revision, some professionals would have wanted a division depending on whether or not the food is prepared on the premises from fresh produce (i.e. not frozen), but this distinction seemed difficult to implement by the statisticians. As a result, retaining the current split is desirable in the French classification.

2.7 Everyone is in agreement to recognise that two types of service coexist within catering, corresponding to very different operating methods: collective catering under contract (which is based on a long term contract) and the organisation of events (which essentially corresponds to one-off services). To be relevant, international comparisons must be able to differentiate between the two activities. Furthermore, within collective catering, it would also be useful to differentiate between canteens and company restaurants which welcome customers and manage the premises, and businesses which cook and prepare meals, deliver them (and therefore have to organise the logistics) but do not serve them.

Proposal for the breakdown of group 552 "catering and food services contracting":

522 catering and food services contracting
5221 canteens and company restaurants
5222 other collective food services
5223 organisation of events

Explanatory notes:

Class 5221:

This class includes the supply and, possibly, the preparation of meals and drinks, generally at reduced prices, to clearly defined groups of people who are linked in a professional capacity: company or public establishment canteens, school canteens and university refectories, military messes, etc.

This class also includes the activities of central kitchens which prepare meals designed for a closed group of canteens.

Class 5222:

This class includes the preparation of meals in central kitchens on behalf of a third party supplying these meals: canteens, company restaurants, university refectories and transport companies.

This class does not include the activities of central kitchens which prepare meals designed for a closed group of canteens.

Class 5523:

This class includes:

- the preparation of meals or cooked dishes delivered to and/or served at home.

- the organisation of wedding receptions, banquets, cocktail parties, buffets, lunches and various receptions at home or in premises chosen by customers.

2.8. The current ISIC draft is planning to limit "beverage serving activities" (class 523) to the distribution of alcoholic drinks: this distinction seems unworkable and has no meaning in France where most establishments serving drinks without meals consist of "cafés" which sell both alcoholic and non alcoholic beverages, and would be unable to distinguish between the income from one compared with the other.

2.9. Where the service provided includes both a food service and another service (e.g. music or dancing), a criterion could be proposed which would be used to ascertain the classification of the service: the activity is classified as a function of the service which defines the pricing. This criterion is also used, according to the explanatory notes, to exclude "restaurants and night clubs that provide live entertainment in addition to the sale of food and beverages" from entertainment activities (division 80) in order to classify them in food services (section J). Under these conditions, the sentence "These activities can also be combined with some other forms of entertainment" should be deleted from the explanatory note of division 52 "food services": multi-activity units will therefore be classified in accordance with the general rule.

Likewise, it should be clear that establishments which charge for beverages should be classified in the "beverage serving activities" group, even if they also offer customers musical or dancing entertainment. However, establishments which charge an entrance fee to access the entertainment will be classified under entertainment activities, if these entrance fees form the majority of their income (or more specifically provide more than half of their value added). If this principle is used, neither night clubs nor discotheques should be mentioned in the explanatory notes of the "beverage serving activities" sections, since these involve, depending on the case and the country, establishments which can operate with one or other system, under the same name.

Proposal for the explanatory note for division 52:

Delete: "These activities can also be combined with some forms of entertainment"

Proposal for the explanatory note for class 5230:

This class comprises the activity of preparing and serving beverages for immediate consumption on the premises.

Proposal for the explanatory note for class 8329:

*This class includes activities related to amusement and recreation (except amusement parks and theme parks) not elsewhere classified: [...], dancing cruises, dancing places.
(without reference to discotheques)*

3. Information and communication (section K)

Publishing activities (division 53)

- 3.1. Professionals and statisticians confirm their support for the current version of the draft in which no distinction is made within publishing depending on the nature of the medium. However, the classification of software publishing is questioned: its reintegration within information technology services is requested, due to its similarity with customized software development activities.
- 3.2. Publishing of videotapes, publishing of multimedia and publishing of video games encompass several activities: these are publishing activities in the audiovisual domain which involve the use of computers. The professionals are asking for them to be included in a specific class, to come within division 54.
- 3.3. To obtain a better balance in the homogeneity of divisions 53 and 57 respectively, we propose to move the news agencies into division 53 (see § 3.6 to 3.10). Furthermore, the class reserved by the draft for news agencies could be expanded to cover all intellectual information processing activities, i.e. by grouping news agencies (5731 in the draft), independent journalists and photojournalists (included in 8010) and "other information services" (5739). The title of the division could then be "publishing and information processing activities".

Proposal:

53 *Publishing and information processing activities*
531 *publishing*
5311 *book publishing*
5312 *publishing of newspapers and periodicals*
5313 *other publishing (excluding software and videos)*
532 *news agency activities and journalists*
5320 *news agency activities and journalists*

Explanatory notes for class 5320 :

This class includes :

- *news syndicates and news agency activities furnishing news, pictures and features to the media,*
- *activities of independent journalists and photojournalists,*
- *telephone based information services*
- *information search services on a contract or fee basis*
- *news clipping services, press clipping services, etc.*

Audio-visual activities (division 54)

- 3.4. The professionals like the fact that audiovisual production activities are grouped in the same category. They would like to see within international classifications the distinction currently made in France with the production on the one hand and technical services for cinema and television on the other.
- 3.5. Due to the small size of the proposed class 5422 (music publishing activities, separate from sound recording production), there seems to be no point in splitting group 542 "sound recording activities" in two.

Proposal:

54	<i>Audio-visual activities</i>
541	<i>motion picture activities</i>
5411	<i>motion picture production for cinema, television and video</i>
5412	<i>technical services for cinema and television</i>
5413	<i>motion picture, and television programme distribution activities</i>
5414	<i>motion picture projection activities</i>
542	<i>video publishing, multimedia and video game publishing</i>
5420	<i>video publishing, multimedia and video game publishing</i>
543	<i>sound recording activities</i>
5430	<i>sound recording activities</i>

Radio and television broadcasting (division 55)

- 3.6. Within this division, the ISIC draft differentiates between activities using a set of criteria: direct broadcasting or by a third party, free or fee-based broadcasting, general interest or thematic programmes. Closely linked to the North American situation, this division does not appear to be very clear for French people: it would be better if an international classification did not include a breakdown in this division.

Proposal:

55	<i>Radio and television activities</i>
550	<i>Radio and television activities</i>
55500	<i>Radio and television activities</i>

Information technology and other information services (division 57)

- 3.7. The inclusion of libraries and even more of archives in this division seems to rely on a very theoretical approach of what these activities are: professionals and representatives of the concerned fields (the field of information technology as well as the field of document preservation) do not see any rationale in this grouping. Due to the kind of units conducting library and archives preservation activities, their inclusion close to the museums in division 81 (which thus would keep the scope of the present group 923) would seem much more relevant.
- 3.8. Furthermore, it would be better to classify Internet service providers within telecommunications (division 56) rather than within information technology services. Service providers essentially provide a communications gateway service: European directives relating to telecommunications also include Internet service providers.
- 3.9. In the same way, web search portals and data processing and hosting would also benefit from being included in group 571 of information technology services.
- 3.10. Under these conditions, division 57 would cover information technology services on one hand, and news agencies and similar activities on the other, which would make this division very

heterogeneous: a better solution would be to combine the news agency and journalists group with the publishing. Thus division 57 would be restricted to information technology services, as the present 72 division.

Proposal:

- 56 *Telecommunications*
 - [...]
 - 564 *other telecommunications services*
 - 5641 *Internet service providers*
 - 5642 *telecommunications services n.e.c.*
- 57 *Information technology services*
 - 570 *information technology services*
 - 5701 *software production*
 - 5702 *software publishing*
 - 5703 *computer consultancy*
 - 5704 *facilities management*
 - 5705 *web search portals*
 - 5706 *data processing and hosting*
 - 5407 *other information technology services*

4. Real estate, rental and leasing activities (section M)

Rental and leasing (division 63)

- 4.1. Motor vehicle rental companies would like the distinction between short and long term rental to be maintained on a French level, and if possible, included on an international level. Furthermore, the rental of linen is an activity close to industrial laundry services: it is important to continue to differentiate it, as is currently the case in the French classification.

Proposal:

- 63 *Rental and leasing*
 - 631 *renting of transport equipment*
 - 6311 *short term renting of motor vehicles*
 - 6312 *long term renting of motor vehicles*
 - 6313 *renting of other land transport vehicles*
 - 6314 *renting of water transport equipment*
 - 6314 *renting of air transport equipment*
 - 632 *renting of other machinery and equipment*
(no modification proposed)
 - 633 *renting of personal and household goods*
 - 6331 *rental of sports and recreational equipment*
 - 6332 *rental of linen*
 - 6339 *rental of other personal and household items*

5. Professional, scientific and technical activities (section N)

Architecture and engineering activities (division 66)

- 5.1. The ISIC draft groups these activities into a single class. French professionals and statisticians would like architecture activities to be separated from engineering activities. The classification for building inspection services and surveying and mapping services would need to be decided upon: with one or other of these two classes, or in a specific class. Some boundary problems exist which need to be overcome regarding surveyors and construction economists.

Proposal for architecture and engineering activities:
661 <i>architecture and engineering activities</i>
6611 <i>architecture activities</i>
6612 <i>(building inspection services, surveying-mapping)</i>
6613 <i>engineering, technical studies</i>

Scientific research and development (division 67)

- 5.2. The ISIC proposal plans to separate biotechnological research, which assumes that an agreement is reached on the definition of this domain: it seems there is an international definition, which might define the boundary with medical research and agricultural science research. Nevertheless, the interest of separating this item within a classification of economic activities seems slightly secondary to specialists in this domain, with the biotechnology field not being specific enough regarding the actual research activity.

Advertising and market research (division 68)

- 5.3. The ISIC draft, like the current NACE, includes a single class for all activities linked to advertising. For the professionals, the distinction between the management of advertising media and advertising agencies is a traditional analysis grid which should be mirrored, at least on a European level.

Proposal:
681 <i>advertising</i>
6811 <i>management of advertising media</i>
6812 <i>advertising agencies, consultants</i>

6. Administrative and support service activities

Investigation and security activities (division 73)

- 6.1. The professionals represented firstly mentioned the incorrect terminology used in the ISIC draft: the description of the activity should not be limited to transport in armoured cars, since the profession also organises the transport of valuable items in normal vehicles. Instead of "armoured cars", they are proposing the "logistics of valuable items".

Furthermore, within the division, the draft differentiates between "investigation, guard and armoured car services" on the one hand and "security systems" on the other. This division does not reflect the way in which professionals analyse the various activities: if this section has to be divided, a class relating to private security (bodyguard services, logistics of valuable items, electronic security system services) and a class for investigation and detective activities should be included.

Proposal:

73 *Investigation and security*
731 *private security*
7311 *bodyguard services*
7312 *logistics of valuable item*
7313 *electronic security system services*
732 *investigation and detective services*
7320 *investigation and detective services*

6.2. The professionals did however comment that the "investigation and detective services" class would be better placed near to consultancy activities.

6.3. The electronic security systems services included in division 73 must be limited to systems used for the security of people and goods, with the exclusion of systems for the remote monitoring of technical equipment: this point might be mentioned in the explanatory notes.

Proposal for the explanatory note for the "security systems" part:

[...]

This class excludes:

[...]

- the monitoring and remote monitoring of technical equipment.

Other support activities (division 75)

6.4. The general opinion is that the way this division is split is not very clear. Firstly, according to the explanatory notes, "day to day office administrative services" are included in 751: this criterion seems to be the one used to differentiate between activities in group 751 and those in group 753. However, if this is the case, "debt collection services" (7531) should really be included within group 751.

Furthermore, the boundaries between classes 7511 (administrative services), 7512 (business services activities), 7519 (other business support services) and 7539 (Other support activities n.e.c.) do not correspond to a very clear distinction: thus for example billing would come under class 7511, secretarial services under 7512 and stenographic and stenotype recording in class 7519. This confusion is also reflected in the titles: "Other support activities" is used for division 75, for group 753 and for class 7539.

A less detailed structure for division 75, but with a clearer dividing line between groups and classes, would be preferable.

Proposal:

75 *Administrative services and other support activities*
751 *administrative services and general services*
7511 *secretarial and administrative services*
7512 *debt collection agencies*
7513 *mailing services*
752 *call centres*
7520 *call centres*
753 *other support activities*
7531 *packaging activities*
7539 *other support activities n.e.c.*

7. Arts, entertainment and recreation activities (section R)

Entertainment activities (division 80)

7.1. In terms of entertainment activities, the main request from the professionals is to distinguish between live performances and other entertainment activities. Within live performances, the distinction could be made between the artistic activities of the live performance, the technical services and associated services, and the operation of live performance halls.

Other artistic activities cover the production of intellectual art and plastic arts: a more detailed division might subsequently make the distinction in line with these two sets of activities.

Proposal:

80	<i>Dramatic arts, music arts and other arts and entertainment activities</i>
801	<i>live performances</i>
	<i>artists and performers</i>
	<i>technical services and services associated to the live performance</i>
	<i>operation of live performance halls</i>
802	<i>other artistic activities</i>
	<i>plastic artists</i>
	<i>other creation activities</i>

Sports activities (division 83)

7.2. The French specialists from the sports industry are satisfied with the general outline of division 83 of the ISIC Rev. 4 draft, especially the inclusion on the one hand of fitness activities and horse riding centre activities on the other. However, under these conditions, the proposed title seems too restrictive and it would be preferable to name this class "physical and sports activities".

Proposal for the title of division 83 and class 8303:

83	<i>Physical and sports activities</i>
8319	<i>other physical and sports activities</i>

7.3. Furthermore, given that the "Education" section has been defined in a very broad manner, all sports instruction (not just that provided with a view to achieving an official qualification) is excluded from the activities linked to sports. If more accurate criteria are not defined to specify the boundary between coaching, training, instruction and education, where this boundary is not always very clear (or very relevant) in some sports disciplines, the classification of units may have no meaning.

7.4. A better definition of the distinction between activities coming under division 80 and those falling in division 83 might be given in the explanatory notes. In particular, the boundary between "other entertainment activities" included in class 8010 and "other amusement and recreation activities" (8329) should refer to the fact that in the first case, unlike the second, the public are spectators at an event, organised and rehearsed in advance. It might also be useful to state that the organisation of bullfights should be included in class 8329. The exclusion of ballrooms mentioned in the explanatory notes is ambiguous from this point of view: was this just meant to cover dance performance halls?

7.5. Furthermore, the question is raised whether it would not be better to class ski lifts within physical and sports activities (8319), alongside the other activities linked to the sport.

Proposal for the explanatory note for class 8329 "other amusement and recreation activities":

This class includes:

[...]

- *bullfights, fairs and shows [...]*

+ *delete the reference to ski lifts*

This class excludes:

- *performances organised and rehearsed in advance (see 8010)*

- *ski lifts (see 8319)*

Proposal for the explanatory note for class 8329:

This class includes:

[...]

- *ski lifts*

8. Other service activities (section S)

Membership organisation activities (division 84)

- 8.1. Including a separate class 8493 "automobile clubs and travel clubs" has no relevance in France, since the membership of this type of club is very little widespread, while leaving a general "activities of other membership organisations" class is fairly incongruous in comparison.

Proposal for membership organisation activities:

849 *other membership organisation activities*

8491 *religious organisation*

8492 *political organisations*

8493 *membership organisations n.e.c.*

Furthermore, we wondered where membership federations and heads of membership networks are classed: rather than in class 8499 of "membership organisations n.e.c.", some would prefer class 6613 "head offices" (or in a similar class, as class 6612 "holding" would probably not be suitable).

Other service activities (division 86)

- 8.2. Since the idea of classifying industrial washing and dry cleaning services within support activities (even though it consists of an activity resulting from the outsourcing of a function by businesses) has not been retained, it seems essential to differentiate it from "retail" washing and dry cleaning services.

Proposal for the division of class 8601:

8601 *industrial washing-dry cleaning*

8602 *washing-dry cleaning for general public*

Explanatory notes:

Industrial washing-dry cleaning:

This class includes :

- *laundering and dry-cleaning, pressing, etc. of all kind of clothing (including fur) and textiles for industrial or commercial clients ;*

- *laundry collection and delivery,*

- *carpet and rug shampooing and drapery and curtain cleaning, whether on clients' premises or not.*

This class also includes repair and minor alteration of garments or other textile articles when done in connection with cleaning.

Washing-dry cleaning for general public:

This class includes :

- *laundering and dry-cleaning, pressing, etc. of all kind of clothing (including fur) and textiles provided by mechanical equipment, by hand or by self-service coin-operated machines for the general public*

- *depository for clothing and textiles to be laundered or dry-cleaned, opened to the general public.*

