

## Call for Evidence and Consultation response form

### Your response

#### Call for Evidence

Question	Your response
<p>We are seeking views and information on the role and impact of online intermediaries on the news consumption journey of UK consumers and the UK news media landscape.</p>	<p>MG ALBA is concerned about the increasing role of online intermediaries on the media consumption of consumers. This goes beyond news media and has an impact on the consumption of minority language output, which includes news, as the driver for such intermediaries is often focused on populist and mainstream content provision, significantly impacting on the delivery of plurality.</p>
<p>We are seeking views and information on whether the role and impact of online intermediaries gives rise to new media plurality concerns; and, if so, how the regulatory framework might be updated to mitigate such concerns.</p>	<p>Online intermediaries have the potential to dominate the visible pathways to content thereby demoting important but significant media to less visible/accessible spots. It is essential that domination of the pathways is addressed, and mechanisms are found to maintain the plurality of content, which will align with the delivery of public service media.</p>
<p>We are seeking views and information on how the algorithms used to recommend news content to UK consumers work in determining the prominence given to different news providers.</p>	<p>For minority language media it is essential that accessibility and visibility are paramount. The consumer is faced with a wide variety of choice, they should have the ability to choose news sources which are in their language. Prominence is invaluable for minority language media, which due to its constraints, such as funding and audience, will be unable to generate/buy the prominence.</p>
<p>We are seeking views and information on whether the role and impact of algorithms on the news consumption journey of UK consumers and the UK news media landscape.</p>	<p>Algorithms may lead to a reliance on sources, without exposing the consumer to a wide range of media, thereby limiting the consumer and not exposing them to the wide range of sources that are available. This may exclude minority language media, thereby having a detrimental</p>

	<p>impact on the consumer's ability to access information in their language.</p>
<p><b>We are seeking views and information on whether the role and impact of algorithms gives rise to new media plurality concerns and if so, how the regulatory framework might be updated to mitigate such concerns.</b></p>	<p>There are concerns in relation to media plurality as algorithms can allow larger media organisations, who have significant audience engagement budgets, to take precedence as preferred content providers. Rolling news, for example, is not a visible provision on Gaelic media, but this does not diminish the news output, which is essential, therefore it should not lose its status due to an algorithm determining an individual's content priorities.</p>
<p><b>We are seeking views and information on the role and impact of market change, outside the context of a merger, on the news consumption journey of UK consumers and the UK news media landscape.</b></p>	<p>The growth in the online market and the ability of consumers to access content in a wider range sources and formats as dramatically changed the media landscape. The ability of news and content creators to circumvent the traditional platforms, as well as constraints, raises concern about dominance of sources, as well as the role of local/ minority news media and their ability to operate in this space.</p>
<p><b>We are seeking views and information on whether the role and impact of market change, outside the context of a merger, gives rise to new media plurality concerns, and if so, how the regulatory framework might be updated to mitigate such concerns.</b></p>	<p>The importance of media plurality should be underpinned by its ability to ensure that media sources are allowed an equal voice and are not allowed to be marginalised by larger media outlets.</p>

<p>We are seeking views and information on whether there are other features of the UK news media landscape whose roles and impact on the news consumption journey of UK consumers and the UK news media landscape we should consider.</p>	<p>Minority language media, as well as local and regional media, is essential in ensuring that audiences recognise themselves and their community in media output. The importance of these media sources, who may not be able to dominate online media like other sources, should be regarded as priority sources to ensure plurality is achieved.</p>
<p>We are seeking views and information on whether there are other features which give rise to new media plurality concerns and if so, how the regulatory framework might be updated to mitigate these concerns.</p>	<p>No response</p>

## Consultation

Question	Your response
<p>We are seeking views and supporting evidence on our recommendation that the national cross-media ownership rule should be retained in its current form.</p>	<p>No response</p>
<p>We are seeking views and supporting evidence on our recommendation that the appointed news provider rule should be retained in its current form.</p>	<p>No response</p>
<p>We are seeking views on our proposed scope of the term “news creator” and in particular, whether the categories that we have identified as being important to be captured within this new definition are the right ones.</p>	<p>No response</p>
<p>We are seeking views on our proposed modifications to the existing public interest considerations specified in section 58 of the Enterprise Act 2002 to extend these considerations to “news creators”.</p>	<p>No response</p>
<p>We are seeking views and supporting evidence on our recommendation that the restriction on advertising agencies holding any broadcasting licences should be removed.</p>	<p>No response</p>

<p><b>We are seeking views and supporting evidence on our recommendation that the restriction on political bodies and local authorities holding all licences should be retained in their current form.</b></p>	<p>No response</p>
<p><b>We are seeking views and supporting evidence on our recommendation that the restriction on the BBC, Channel 4 Corporation and S4C holding Channel 3 or Channel 5 licences should be retained in their current form.</b></p>	<p>Section 208 Communications Act 2003 also prohibits MG ALBA from providing those services. MG ALBA does not object to the retention of the restriction.</p>
<p><b>We are seeking views and supporting evidence on our recommendation that the general disqualification on grounds of undue influence of political bodies and local authorities should be retained, but the general disqualification on grounds of undue influence of publicly-funded bodies should be removed.</b></p>	<p>No response</p>
<p><b>We are seeking views and supporting evidence on our recommendation that the restrictions on analogue community radio licences should be retained.</b></p>	<p>No response</p>