



Response from the Centre for Cultural Policy Research (CCPR),

University of Glasgow

to

Ofcom Consultation on Ownership and Plurality in the UK Media

What are the options for measuring media plurality across platforms? What do you recommend is the best approach?

Identifying an appropriate measure of media plurality requires as first step an agreed definition of the term. Once the meaning of plurality across platforms is clear a range of possible approaches towards assessing it is possible. For example, a Study on Media Pluralism Indicators carried out for the European Commission and published in 2009 provides one possible tool for monitoring and measuring levels of pluralism based on evaluating a very comprehensive range of potential risk factors including levels of ownership, content diversity and existing regulations in the market in question - see http://ec.europa.eu/information_society/media_taskforce/pluralism/study/index_en.htm

We recommend the best approach is to focus on levels of diversity of ownership and control of the main avenues through which media content is consumed. A relevant measure would be owners' share of voice (as measured by time and money spent by consumers) on the main delivery platforms for media – television, radio, newspapers and the internet.

Given the pivotal role of media in sustaining political careers, it seems doubtful whether any system of regulating ownership which is based on discretionary judgments or interventions by a government minister will be effective. Therefore a system based on clear, equitable and transparent upper limits on ownership by platform offers the best approach.

Is it practical or advisable to set absolute limits on news market share?

In view of the role played by news provision in sustaining democracy, levels of market share in news provision deserve specific attention to ensure at least minimal levels of diversity. However the need for pluralism is based not only on political but also cultural and social concerns. Part of the rationale for ensuring a pluralistic system of media provision is in order to ensure access to diverse representations of culture and to promote tolerance and social cohesion. Therefore a focus on news markets alone is not sufficient to ensure media plurality.

As discussed above, we believe it is practical and advisable to set clear absolute upper limits on ownership share of media by platform.

What could trigger a review of plurality in the absence of a merger, how might this be monitored and by whom?

Once a new framework of regulation to promote and sustain media plurality is agreed, a review of plurality and of compliance with the regime should be carried out by Ofcom immediately and at periodic intervals thereafter. A timeframe of five years between reviews seems reasonable. The purposes should be to ensure compliance and that measures to protect plurality remain up-to-date.

Could or should a framework for measuring levels of plurality include websites and if so which ones?

Yes – the focus needs to be on the main avenues for consumption of media and this now includes the internet. Share of voice could be measured through evaluating owners' proportionate share of total time spent on the 100 most popular media-related websites.

Whether or how it should include the BBC?

The activities of PSBs generally play a helpful role in extending diversity and therefore promoting pluralism. Even so, any framework used to assess levels of media plurality would be incomplete unless it were to take into account the share of voice of the BBC in relevant markets. Therefore the BBC should be included for purposes of assessing the total extent of the radio, television and online markets. But, on account of its exceptional public service status and role, the BBC should not be subject to the restraints on share of voice which apply to commercial media providers.

CCPR, October 28, 2011