

Response to Ofcom Media plurality measurement framework – call for inputs.

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Summary of key points

1. [Share of reference](#) is a useful indicator, but can be improved by adjusting survey questions. It should be supplemented with other metrics and data to address areas where it is weak.
2. By moving to a [defined news consumption time frame](#), Share of references could better account for the relative importance of news sources and limit ambiguity.
3. Ofcom needs to [clearly define 'news sources'](#) and ensure that all underlying research distinguishes between news providers, gatekeepers and 'conduits'. Failure to do so will result in misleading indicators.
4. The editorial and pseudo-editorial functions of ['intermediaries'](#) and 'platforms' affect the news consumers read (posing potential risks to plurality) and should be adequately measured and taken into account.
5. As the consumer shifts to a complex media ecology with [multiple touch points](#), some outside of traditional news brands and increased frequency, there are no individual data sources or metrics which provide a single true view of consumption and the risks to plurality. Survey data (existing and additional) will have to be considered with new proprietary data and third party sources to get a true picture of consumption habits and risks they entail.
6. [Rapid shifts in consumption habits](#) (and any accompanying risks to plurality) within the online news industry risk being missed without regular monitoring. To prevent market uncertainty Ofcom could increase the scope of its annual news consumption report to better account for these trends.

¹ The author would like to thank Dr Damian Tambini for his contribution towards this response including indispensable advice and comments. All errors are the responsibility of the author.

2. Is Share of reference appropriate to measure cross media consumption? Are there other metrics of particular relevance to measuring cross-media news and current affairs consumption? What are their pros and cons?

Share of reference offers a solid basis for measuring cross media consumption. There are however improvements that can be made. References carry equal weight within the current framework however in reality consumers spend varying amounts of time on different sources. A user who flicks through *The Metro* on their commute for 5 minutes should be distinguished from a reader who reads *The Times* for 45 minutes. One solution would be to move questions to a weekly/monthly frequency rather than 'nowadays' which means different things to different people.

I suggest the following questions:

- How much time do you typically spend consuming news in a day/week/month²?
- What sources of news would you use within this period?
- How much time do you spend on each source within this period?

Each respondent would be able to account for their news consumption time and split this between the channels and providers they use. In aggregate, we would be able to define how the typical news consumer's time is distributed and what share individual sources and brands take. This approach takes account of the relative importance of each source by using time allocated. An additional advantage is it can be interpreted intuitively- Online has a 27% share of references is arguably less intuitive to a wider audience than online accounts for 27% of news consumption time. Time spent could also be used as a proxy for influence.

Secondly, Ofcom needs to clearly distinguish between where a user accesses news and where news originates. Social media, search engines and news aggregators are not sources of news (for the most part)³. Considering them as such will underestimate brands whose content is shared on these platforms. Research from the US suggests as much as [20% of news traffic](#) is referred from social media while The Guardian reports that [50% of their traffic](#) comes from search and social sites. The point is these platforms are often conduits where news content is shared. In 2013 Ofcom reported that social media had a 22% share of reference online⁴ however this is misleading if the majority of news consumption on social media refers to the consumption of news brands. One solution here would be asking users who use social media follow on questions about where the news they consumed originated- news brand e.g. Guardian, Daily Mail or comment by friends/family.

The accuracy of share of references can also be improved by ensuring content from other genres is excluded. Explicitly asking respondents to exclude content which is not directly linked to news and current affairs and providing examples of what does not constitute such e.g. celebrity news and TV listings may suffice here. This holds increasing relevance as news consumption shifts online where news websites often host a multitude of diverse content.

Finally there is established research on user bias in media consumption surveys. Respondents are more likely to recall sources they ideologically align with or believe are socially desirable. Estimates of news viewing from surveys were on average three times as high as Nielsen estimates and up to eight times as high in some demographic groups⁵. Prior (2009) concludes that "self-reports of regular news exposure are reliable measures of how much news people think they watch. As measures of people's actual news exposure, they lack validity" In a converged media ecology, I would contend this bias is unlikely to disappear and may worsen. To correct for this issue Ofcom could attempt to adjust claimed figures- For example comparing BARB or actual online consumption figures to claimed usage figures and adjusting.

² There are logistical questions about whether you use daily (and extrapolate) which might be easy to recall however monthly/weekly publications may be missed. Alternatively a weekly/monthly question may be harder to recall but offer more comprehension on sources.

³ Comment on news of the day by friends may constitute an original news sources on social media

⁴ [Ofcom, 2013 " News Consumption in the UK- 2013 report"](#)

⁵ [Prior M, 2009 "The Immensely Inflated News Audience: Assessing Bias in Self-Reported News Exposure"](#)

3. Are there developments that have had a significant influence on the most appropriate ways to measure plurality in the UK since 2012? How do these developments affect the way in which plurality could be measured? Please provide evidence in support of your views

The most significant impact on the plurality measurement framework has come from developments in the online space namely the rise of digital intermediaries and the shift to mobile.

Digital Intermediaries (search engines, social media platforms and app stores) have become increasingly important gateways to online news even as the internet has taken a larger share of consumer's overall news diets. 41% of respondents used the Internet (up 9% year on year) as a platform for news consumption while TV declined by 5% to 70%⁶. Taking into account the relative youth of the internet and current innovation rate, this shift is unlikely to slow. Digital intermediaries have a very large share of a sector growing in importance to the news industry. Consider that almost half of online news consumers⁷ access their news via search engines and social networks

These trends have implications for media plurality because intermediaries also perform an editorial function. One clear example of this is their use of algorithms to decide what content is 'relevant'. These programmes often use personal web history⁸ or the 'wisdom of crowds'⁹ as a factor to decide on relevance. However deciding which content is relevant by a user's past behaviour or the content that others enjoy while personally useful may not align with the public interest. In other words, this service while very useful to the individual consumer could work against media plurality by encouraging the use of sites/content that align with existing viewpoints and discourage serendipity. Consider Facebook's recent stated desire to "[build the perfect personalized newspaper for every person in the world](#)".

This use of a mobile as channel for consuming online news could potentially present future risks to plurality as well. Here again digital intermediaries play a powerful role. Mobile users claim to rely on news apps¹⁰ more than websites accessed through their browser however the market for apps is dominated by two players. Google and Apple account for 97% of the smartphone [market](#).¹¹ The significance of this is that the news apps users download and thus consume news with are dependent on the conditions of two providers. These actions have a knock on impact in that apps which enjoy promotion or are featured will be downloaded more by users hence earning more advertising revenue allowing them to invest in quality and move further apart from the competition. The suggestion here is not the power resides squarely in the hands of intermediaries to decide which news brands thrive or fail but they play a significant role. Brand reputation and user choice also play a part.

Ultimately the issue here is these intermediaries through their editorial function and control over the mobile market have the power to decide which news content gets seen. Some of this control may raise media plurality concerns but it is difficult to know for certain without further investigation. For instance are users using search engines as a navigational tool to access the news sites they are looking for or as an editorial tool to provide them with the most relevant news website? One way to analyse this would be breaking down 'news' keywords into branded (BBC, Independent) and generic (Ebola, local elections). Does heavy usage of digital intermediaries imply more or less consumption of diverse content. Here Ofcom could split out response from their news consumption survey by users who claim to access news through these sources. Particular attention should be paid to younger demographics where use of internet is higher. 60% of 16-24 year olds claim to consume news through the internet or apps while they are 4 times more likely than older demographic groups to consume news through social media. This group is also more likely to rely on 1 source for their news (23% Vs 20% for the base)¹² How much this is being driven by their use of intermediaries is unknown.

⁶ [Ofcom, 2014 "News Consumption in the UK: research report"](#)

⁷ 46% of online news consumers in the UK claim to access their news via search and social networks – [Reuters Institute, 2014, "Digital News Report 2014"](#).

⁸ [Google Search algorithms uses a users search history where available as one signal to decide on ranking websites:](#)

⁹ [Facebook's Newsfeed determines which content to show by relying on how many likes, comments and engagement a particular post has received from users as whole as 1 signal.](#)

¹⁰ – [Reuters Institute, 2014, "Digital News Report 2014"](#).

¹¹ <http://www.idc.com/prodserv/smartphone-os-market-share.jsp>

¹² [Ofcom, 2014 "News Consumption in the UK: research report"](#)

Current measurement techniques on media plurality may be able to point to concerns for example the BBC has a very high share of references but may struggle in explaining why this is the case and the role of intermediaries here.

4. What are the relevant metrics to quantify the use of online news and current affairs? What are their pros and cons?

To quantify online usage accurately, a distinct count of users across multiple devices and locations needs to be established. This is a difficult challenge which commercial solutions are only beginning to address. Ultimately this is less about the choice of metric than the source of data. As each source has its pros and cons, Ofcom will need to look beyond 1 source and rely on multiple sources drawing from their respective strengths.

Claimed Usage offers a practical way of measuring online activity in a multi device, 'always on' world. There are however serious drawbacks with accuracy. As the numbers of touch points where news is consumed have multiplied, the ability of a consumer to recall and interpret them as news is likely to be impaired [Research](#) suggests that people are consuming more news, more frequently throughout the day but in shorter intervals- so called 'news snacking'. We have already discussed the user bias in surveys. In a more complex news environment, this bias could worsen. Without detailed and exhaustive sub questioning (where accuracy could be further affected) it is often difficult to understand engagement and loyalty from claimed usage data.

Web analytics in this regards offers clear advantages; it can tell how many pages were viewed, what pages and how long was spent on them in precise detail through cookies (small text files dropped on a web browser when they visit a site). Accuracy here is an advantage as this is not claimed but actual behaviour. There are however drawbacks- also with regards to accuracy. The most significant is the visitors vs. browsers discrepancy. Visitors are measured by the unique cookie id dropped in the browser. Any new browser is therefore automatically counted as a new user. However a new browser does not mean a new person. On the contrary in a multi device world where 1 user can access a site from a work pc, mobile, tablet and home laptop, browsers are unlikely to be a reliable indicator of distinct people. In our example, existing methodology would class this as 4 users when in reality this is one person. 39% of online news readers use more than 2 devices highlighting the extent of multi device usage and potential user inflation¹³. Inflation of user counts has knock on impacts on the accuracy of other metrics such as pages viewed per visitor and conversion rates. An inability to measure distinct users accurately has led the industry to adopt the unique browsers metric which in itself does not combat the problem but is more about transparency.

comScore's [Unified Digital Measurement](#) (UDM) methodology aims to counter this drawback by combining panel and census measurement of digital audiences. Proprietary solutions, specifically the [comScore MMX Multi-platform](#) allow de-duplication of users to calculate a total digital audience that is distinct across platforms. So the one user on their smartphone, laptop and tablet is counted as one not three. Undoubtedly comScore's approach presents the cutting edge and the most advanced of these approaches. There are however a few potential caveats. It is based on modelling and assumptions about how individual users use multiple devices. It estimates this by extrapolating multi device activity from assumed single person households and assuming the rest of the population behaves in a similar way. There is no way of verifying if their definition of a single person household is accurate or if individuals in single household are representative of the wider population. Finally it is unclear how it incorporates work pc usage if the unit of analysis is the IP address at the household level? Nevertheless it currently represents the most advanced approach on the market and an improvement on other approaches.

Recommendation

Using a proprietary solution like comScore's MMX to calculate a distinct digital audience offers the best solution to quantify online usage accurately and establish engagement and loyalty metrics such as pages viewed, visit frequency and time spent. There is still a key role for claimed usage data. For example to understand and quantify online news consumption outside of established channels on

¹³ [Reuters Institute "Digital News Report 2014 Tracking The Future Of News"](#)

social media and to understand a user's total news diet. Isolation of news and current affairs content is however a challenge which does not currently have a clear solution. Ofcom should endeavour to work with the biggest news providers to understand how much of their usage is driven by genres outside of news and current affairs and apply adjustments.

5. Does the ongoing evolution of online news consumption create challenges for measuring plurality? How should a measurement framework seek to address these?

The dynamic evolution of online news will provide key challenges to measuring plurality. Media companies can gain significant market share through innovation and investment in content¹⁴. Ofcom¹⁵ suggests periodic reviews of plurality to prevent the market uncertainty that will come with reviews triggered by metrics or discretion. However in a market where players such as BuzzFeed, a 7 year old start up can go from [0 to 10 million UK readers](#) without a UK based presence, [surpassing existing players](#) there is a real danger that material shifts in consumption patterns are missed which may have a knock on impact on plurality. Mobile is an indicative example of this. Driven by advancements in smartphone functionality 24% of UK digital news consumers say their phone is their primary access point for digital news¹⁶. Smartphone users are however more likely to rely on fewer news sources according to the 2014 Reuters Digital News Report. Rapid market developments like this show how consumer shifts with repercussions for plurality can happen in the space of a 2 to 3 year window.

Disaggregation of content i.e. individual articles from a newspaper or brand and the shift to social sharing is encouraging consumption of news outside of established news brands. Whether it is niche blogs or comments on social media, users could just as easily be exposed to opinions and views without visiting traditional news brands. This provides a key challenge as it is much more difficult to track. Users may not interpret a friend's social media post on a "public issue" as news in the traditional sense and may therefore not think to report it.

Similarly the shift to "news snacking"; short bursts of news consumption more frequently could produce problems with user recall and measurement. A user is unlikely to recall and list all their interactions with the news if they are 'always connected'- plugged in receiving a stream of news throughout the day often from different sources? Claimed usage may underreport all but the most loyal of interactions. Accurate measurement across all channels however becomes even more vital if there is a suggestion that some channels may be impeding plurality. This is because we then need to identify and capture a consumer's total news diet accurately before a judgement can be made as to whether that consumer is at a higher risk.

Recommendation:

While a periodic review on balance offers the fairest balance between market predictability and the public interest. Ofcom should expand its annual [measure of news consumption](#) to include questions that explore the consequences on media plurality of new media consumption habits. For example, exploring in greater depth the impact of mobile on diverse news consumption and keeping tabs on players in the online news world. Regular monitoring of key trends will in turn facilitate more in-depth periodic reviews.

There are no silver bullets to gain insights into user behaviour in a multi-platform world. Claimed usage still offers the best practical and cost efficient solution to understand overall news consumption across device and channels. To guard against user bias and improve accuracy Ofcom should supplement claimed usage with data from online panels such as ComScore (see above). To capture news consumption outside of established brands and providers, Ofcom should ask separate questions that explore in-depth usage of social media or utilise third party research.

¹⁴ Crauford Smith R & Tambini D, 2011 "[Measuring Media Plurality in the United Kingdom: Policy Choices and Regulatory Challenges](#)"

¹⁵ Ofcom, Measuring media plurality, 19 June 2012, and Ofcom, Measuring media plurality: Supplementary advice to the Secretary of State for Culture, Media and Sport and the Leveson Inquiry

¹⁶ [Reuters Institute "Digital News Report 2014 Tracking The Future Of News"](#)