

*“Working for quality
and diversity in
British broadcasting”*

Founded in 1983 by Jocelyn Hay CBE



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**Voice of the Listener & Viewer Response to
Ofcom’s call for inputs to
the media plurality measurement framework**

27 November 2014

Voice of the Listener & Viewer

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INFORMATION ABOUT THE VLV

The Voice of the Listener & Viewer (VLV) is an independent, non-profit-making association, free from political, commercial and sectarian affiliations, working for quality and diversity in British broadcasting. VLV represents the interests of listeners and viewers as citizens and consumers across the full range of broadcasting issues. VLV is concerned with the structures, regulation, funding and institutions that underpin the British Broadcasting system.

INTRODUCTION AND GENERAL COMMENTS

1. The VLV welcomes this opportunity to respond to Ofcom's request for input on its proposals for a media plurality measurement framework.
2. VLV believes this work is vital if Ofcom is to be able to assess media plurality adequately and thus fulfil its primary duty to further the interests of citizens and consumers in communications matters.
3. It is crucial that such a framework is in place so that any future issues of media plurality can be assessed against accepted and established criteria, rather than as an 'ad hoc' response to a particular set of circumstances.
4. VLV wishes to stress the importance of maintaining a plurality of free-to-air provision within the broadcasting ecology. This is essential if citizens in the UK are to have access to affordable media platforms where there is available a wide range of information, opinions and content relevant to their lives.
5. VLV only partly agrees with Ofcom's contention that news and current affairs output is the primary genre which should be used to test media plurality (1.3). We would also assign considerable significance to other genres, such as drama, children's programming, sport and factual programmes because it is crucial that audiences are offered a range of representations of issues and themes relevant to our culture. It is VLV's view that the public should not have to pay a subscription to be able to view a range of children's output or sporting coverage. The provision of a diverse range of such content, aimed at different audiences, should be one of the tests to measure media plurality.
6. We welcome the fact that Ofcom has been asked to develop a suitable set of indicators to inform the measurement framework and to decide on the metrics that are most appropriate for each of these indicators. We agree that one of the indicators should be focused closely on media ownership.
7. We also agree that it is crucial no organisation or news source should have a share of consumption that is so high as to create a risk that consumers are exposed to a narrow set of viewpoints.

8. VLV welcomes Ofcom's concern to include viewers' behaviour and interaction with broadcasting (1.22).
9. VLV supports Ofcom's decision to include online news content and its view that a periodic review of plurality would provide the best approach in relation to a trigger. We welcome Ofcom's desire to produce a framework which would enable future market analysis (1.11,1.12).
10. We accept the rationale for BBC news and current affairs being included in the framework; but we would note that as a publicly funded, not for profit organisation, with a governance structure designed to protect the public interest, it has a unique role in the ecology of news provision which distinguishes it from other news providers. Any media plurality measurement framework needs to acknowledge that the BBC is not competing with other broadcasters for advertising revenue.

Whilst traditionally it has been the BBC which set standards, it is an important aspect of the national broadcasting ecology that there are other broadcasters, such as Channel 4, to offer high quality alternatives which are free at the point of access. We assume this will be one of the key aspects of any measurement of media plurality.

11. Whilst VLV welcomes additional provision of programme content by subscription only services and wishes these to be included within the proposed framework, our concern is primarily to retain the existing level of Public Service Provision which is free at the point of access.
12. Given VLV's particular concern with the quality of Public Service Broadcasting, we would particularly endorse one of the proposed criteria (1.14), namely:

Overall investment and commercial returns that are sufficiently high to ensure sustainability and support high quality coverage, extensive newsgathering and investigative journalism.

13. We agree that contextual factors such as regulation, governance and internal plurality within organisations should be considered when drawing conclusions about media plurality.
14. We also agree that the influence of online news aggregators have a significant impact on choice and should be considered when assessing which companies are exerting control over the media we use.

REPLIES TO QUESTIONS

VLV accepts the reasoning behind the questions proposed in the document, but only wishes to comment on selected questions which relate to our concerns because our expertise lies in broadcasting rather than in online content platforms.

Question 1

With regard to the metric of *Availability* the VLV is concerned that any framework measuring the plurality of the news media market should distinguish between content which is free at the

point of access and subscription only content. It is crucial that content which is free at the point of access should be measured separately from content which is subscription only.

Question 5

VLV questions whether the key issue relating to the provision of online news is not so much measuring plurality as looking at the different systems of financing online news. Where the BBC and other broadcasters use online platforms as another means of distribution, other commercial news media companies, at national, regional and local levels, have been concerned with the loss of revenue from print journalism and the difficulty of monetising online news. If the ultimate aim is to ensure a variety of high quality news services at national, regional and local levels then there may need to be some new system of financial support offered to news providers.

Question 9

VLV believes that the retail and wholesale measurements Ofcom used in its previous work remain relevant to this framework discussion in assessing the role and influence of different media owners. VLV believes that it is crucial to support the existing public service broadcasters in the face of increasing competition from commercial providers, primarily because the public service broadcasters are subject to a regulatory process which ensures quality content.

With regard to media ownership, VLV is concerned by the current trend for the purchase of independent production companies by overseas interests. It has even been rumoured that ITV might be bought by a foreign investor. VLV is concerned to ensure that Ofcom will be able to enforce the requirement for the commercial PSB networks to continue to provide a large proportion of their content from UK/European sources. VLV is anxious to ensure that current levels of investment of UK-produced content are maintained, regardless of the nationality of the company which may own a production company/platform. We believe that it has been the strict rules over the percentage of broadcast content which has to be UK produced which have safeguarded UK broadcasting in contrast to the historical dominance of the British film industry by its much larger Hollywood rivals.

Question 10

With regard to news and current affairs organisations operating in part of the value chain other than the retail and wholesale levels, VLV believes that it is important to explore whether it is possible to include aggregators of online news and social media platforms in a framework for media plurality. We accept that this may be a very difficult task but from cases in the recent past involving the use of social media to attack individual women who had been involved in gender campaigns, it is clear that such social media can no longer be seen as a matter of individual communication. It may be that this area is one for possible regulation because social media platforms have an increasingly strong influence on the dissemination of news.

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