

Question 1: Do you agree with our proposed measurement framework for media plurality? What, if anything, should be added to the measurement framework?:

My comments in response to the consultation concentrate on the issue of media impact and in respect of which I suggest a somewhat modified approach. I propose focussing predominantly on measuring the final desired outputs in terms of the public awareness of key political viewpoints. Those measurements can then be used as the basis of iterative approaches for tackling, as necessary, the challenge of ensuring that the public is made aware of and able to consider those viewpoints. This is as opposed to an approach to the measurement of impact which would attempt to unpick how media may, as one factor among a host of others, have some effect on the views of individuals at any one point in time. This latter approach would require a much wider and more detailed study than is being contemplated by Ofcom at this time.

In contrast, in large part I agree with Ofcom's approach to measuring availability and consumption.

Question 2: Do you agree with our approach to online content? If not, how could it be improved?:

The main point I would underline here is that it is necessary to focus Ofcom's efforts on the news sources making up the large majority of on-line generated media content over any delivery platform. The "Long Tail" of small scale media providers and individuals will provide diverse and niche content and should not generally be a source of concern in terms of their level of influence over political views.

Question 5: Do you agree with our approach to measuring impact? If not, how could impact be better captured?:

Typically, where it appears difficult to arrive at any measurement or estimate, that is because the subject of the measurement has not been defined sufficiently precisely.

In order to assess media impact therefore it is necessary to define the term impact, and furthermore it is necessary to define it in a way that can be addressed within the scope of the Ofcom study.

While I do not see a precise definition within the consultative document for impact, it seems to me that Ofcom may be trying to assess among other things what impact the media has on political support at any one point in time. If that is the case it would be a definition of impact that would require a wider study than Ofcom is undertaking and moreover represent an extremely ambitious exercise.

A wider study than the one being undertaken by Ofcom would be required because factors other than the media do, naturally, play an important role in affecting public opinion and indeed those other factors may often be more significant in terms of influencing opinion. For example, the views of one's peer group, and the history of political support exhibited at the family level. During the recent General Election much was also made of the apparent correlation between coalfield locations and voting outcomes which, if proven, seems likely to

be a peer group effect.

In addition, and as Ofcom seems to infer, people may not be sure themselves of the reasons for having certain political views. In this respect there is also plenty of evidence in the public domain that people's opinions can be influenced without them realising it. Therefore, assessing how much influence is exerted by a particular factor on public opinion would probably also involve a neurological study. An investigation in to how the full range of major factors influencing public opinion affect people's state of mind at any one point in time including neurological components, and unpicking how much of that state of mind is a result of media outlet influences, is clearly outside the scope of Ofcom's exercise.

Given the narrower focus of Ofcom's consultative process, which does not attempt to measure all major factors affecting public opinion, and given that people may not in fact know what influenced their opinions, I suggest that it may be better to measure outcomes only. Consequently, media impact could be defined simply as the extent to which media changes the level of awareness that people have of the opinions of the main political parties on the key issues of the day.

Concentrating on people's level of knowledge of political viewpoints is more achievable than an approach that seeks to determine to what extent the media influences people's opinions. Using a knowledge based definition of media impact will make it possible to arrive at a measurement of impact via a time series of surveys.

Question 6: Do you agree with the use of contextual factors as part of the framework?:

While contextual factors may appear attractive to consider, many such possible factors may have little if any affect in terms of an influence on people's political opinions. Attempting to investigate them all could then serve to distract Ofcom from the factor or few factors that are making most difference. In terms of the contextual factors the most significant one in terms of determining the media content consumed by the public may be behaviour of those employees in the main media outlets who are directly in charge of producing news programmes and content. Ofcom has captured this contextual factor under the heading Editorial Policy I believe. Again, however, rather than trying to start by looking at these contextual inputs it seems to me that it would be better to look at outcomes first by randomly sampling news and political programmes to assess them for impartiality. If bias is in fact revealed, based on a pre-determined set of impartiality criteria, it would then be possible to consider whether particular forms of action should be taken and how they should be directed.

I think it goes without saying that media outlets that control a significant proportion of media consumption should be subject to impartiality controls as a back-stop measure. However, impartiality requirements do not mean necessarily that impartiality will exist in fact. Therefore, as stated, I would suggest starting with a measurement of whether the outcomes in terms of the content delivered demonstrate impartiality or not. The mere existence of impartiality requirements themselves should not automatically be considered by to indicate a measure of satisfactory media delivery.

Finally, let me add that I think there will be an ongoing tension between attempts to impose impartiality requirements and the content that many people like to consume and therefore that many media outlets are therefore incentivised to deliver to them. This is because presenting

material in an entirely impartial way, and giving equal weight to every side possible, may result in content that many people will find boring or at least less interesting. That may make many people less likely to consume or pay attention to some or all of it. People often enjoy opinions that concur with our own and may pay less attention to those that do not - this is recognised as confirmation bias. Further, many people may often prefer to listen to clear one sided opinions rather than very balanced expressions of opinion. Consequently, viewing figures, and the success of a media outlet publicly and economically, may often be greater if it presents biased material targeted at a particular audience, or provocative material, in which case it will be driven to do just that. That kind of behaviour matters greatly if a media outlet controls a significant share of total media consumption and underlines therefore that the behaviour of such media houses needs to be scrutinised more carefully than others.