

## Ofcom consultation: Measurement Framework for Media Plurality

The News Media Association (NMA) is the voice of news media in the UK representing newsbrands - national, regional and local newspapers in print and digital - in the UK. It was formed last year from a merger of the Newspaper Society and the Newspaper Publishers Association. The NS and NMA have responded to Ofcom's previous consultations relating to its consideration of a measurement framework for media plurality.

The NMA therefore confirms our continuing support for the recommendations and views set out by Ofcom at para 2.25- 2.26 of its 2012 advice to the Secretary of State:

*'2.25 For local areas (below the level of a nation) we believe the issues facing local media are more about sustainability than plurality. In our June report, we said that there was a tension between plurality and commercial sustainability that was exacerbated at smaller geographic units. The same may be true of the English regions. In this context, we would not recommend that a periodic review of plurality considered local or regional media except insofar as they contribute to plurality at the level either of the UK or of one or more of the devolved regions.*

*2.26 In making this recommendation, we note that the existing regime to deal with the competition issues raised by local media mergers is widely perceived as being too onerous. This is not the place to address that concern, but we do believe that it is important that it is not exacerbated by the plurality framework. We therefore recommend that the Government considers whether the public interest grounds associated with mergers should be modified so as to have the same focus as the periodic review: namely, on those mergers which might affect plurality at the level of the UK or the devolved nations.'*

We therefore welcome Ofcom's approach in para 4.74 and 4.75. In particular, the confirmation that

*'the scope set by the Secretary of State for the current measurement framework did not extend beyond the UK nations' level*

*4.75 In addition, in our 2012 advice, we did not propose that any periodic review of plurality should assess regional or local media given that the tension between media plurality and commercial sustainability is exacerbated at smaller geographic units, except insofar as they contribute to plurality at the level of either the UK or UK nations.'*

Our central concern remains that a free press must be recognised as a vital contribution to plurality and democracy, not some instrument of detraction from it. The very characteristics of a free press, valued by our members, of absence from specific state controls, independence of state funding, the freedom to be partisan, or to express a range of views, should not count against it in a measurement framework in any way that might result in new restraints upon publishing activities or published content.

Popularity, trust and engagement earned by a commercial news brand, whether with a wide audience or specialist niche, do not undermine plurality, but add to it. A framework intended to measure plurality must not lead to any restriction or restraint of independent commercial media, as a result of their audience reach or commercial success.

Broadcasting restrictions are not prerequisites of plurality. The press should not be unfavourably contrasted with broadcasters and put in jeopardy of new plurality restrictions upon its growth

because of its freedom from licensing requirements, absence of detailed licence conditions, lack of prescribed governance structures and absence of impartiality requirements.

Similar issues arise in relation to measurement of consumption and impact within 'platforms'- the success and popularity of titles and news brands should not be considered as detrimental to plurality, nor as some harmful contribution to the functioning of democratic society.

We welcome Ofcom's continuing acknowledgment that there are many contributors to media plurality, beyond the press, and that a measurement framework should take these into account. We agree that measurement of plurality ought to encompass the BBC, broadcast media, and the number, scale and impact of online services, other than those provided by the press, together with an acceptance of the variety of ways in which they operate and effect. We agree that the influence of 'curators', intermediaries and aggregators, other than news media companies and their news brands, ought also to be recognised.

However, the consultation paper does not make clear how the various different types of measurement would be brought together to arrive at any conclusions. Nor how plurality is to be evaluated, or how that evaluation might be judged, or what use might then be made of it.

We trust that Ofcom will therefore continue to consult upon its approach and publicise the development of its thinking.

We would be happy to discuss any issues further.

News Media Association  
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