

Measurement framework for media plurality

A consultation on Ofcom's proposed advice to the Secretary of State for Culture, Media and Sport¹

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This public document, as a respond to the Ofcom consultation, is prepared by Ms. Kinga Incze, CEO&owner of Mrs. White Media Consulting Ltd. (Budapest, Hungary), founder of Whitereport.hu mediabrowser (www.mediabrowser.eu) on 20th May 2015

Introduction

Mrs. White Media Consulting is an independent strategic media consulting company in Hungary since 2002, working for local an multinational players of the media industry, with a team of senior media advisors and researchers with media agency and media background.

We are proud to be the founder and operator of **an innovative cross-media data base platform called [Whitereport.hu mediabrowser](http://Whitereport.hu_mediabrowser)** („mediabrowser”)², accessible via www.mediabrowser.eu or www.whitereport.hu for subscribers.

We developed the mediabrowser as the media market is getting more and more fragmented in all over the world, so it is important to discover, „register” and monitor the complete media supply, including even the long tail of classic media – some of the „hidden” media might have much migher impact on opinions as we suppose.

The mission of our service is to **create full transparency on the media market** by delivering a **user friendly platform and quick, regular, factual** (not self-reported!) descriptive data on every single media, content provider and owner(s) of content provider, to make the media market searchable and monitorable.

In Hungary the mediabrowser works as an industry tool used by advertisers, media owners, agencies, authorities – including NMHH, the Hungarian Media Authority).

Currently the mediabrowser is used to support media optimisation, market analysis on macro-level, by segments, as well as to provide ownership data for analysis, merge&acquisition purposes.

Our objective is to present that our mediabrowser solution could also serve as a standard tool for measuring and monitoring certain aspects of media pluralism (e.g. diversity, media ownership), and could be used in other countries, as well.

We would like to take this opportunity to respond to the consultation call of Ofcom on media pluralism, hoping that our work would support the goals of Ofcom.

¹ http://stakeholders.ofcom.org.uk/binaries/consultations/media-plurality-framework/summary/Media_plurality_measurement_framework.pdf

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We represent a pragmatic, problem-solving approach, so this document will focus on those questions where we hope to deliver additional thoughts, value.

Please note that our definitions might not always follow the UK standards.

Consultation questions listed by Ofcom

1. Do you agree with our proposed measurement framework for media plurality? What, if anything, should be added to the measurement framework?
2. Do you agree with our approach to online content? If not, how could it be improved?
3. Do you agree with our approach to media ownership? If not, how could media ownership be better captured?
4. Do you agree with our approach to measuring cross-media consumption? Are there other metrics which might better capture cross-media consumption?
5. Do you agree with our approach to measuring impact? If not, how could impact be better captured?
6. Do you agree with the use of contextual factors as part of the framework?
7. Do you agree with our approach to measuring plurality in the UK nations? If not, how could plurality in the nations be better measured?

Q & A

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

In general

a) What is the sample of measurement?

In terms of type of content: we agree to monitor and measure news and current affairs type of media (exact definitions required!³).

In terms of media types: from methodology point of views it is recommended to separate

- i) classic, „ATL⁴“-type content provision (content of tv, radio, print, online media brand - in their cases media pluralism and ownership can be measured via a cross-media mediabrowser-view and measurement system.
- ii) from all other content distributed by aggregators, social media platforms, user generated content or any other content created on digital platforms - in their cases digital content analysis tools⁵ might be the right way to measure media pluralism and ownership.

However we believe that in longer term „cross—cross-media“ measurement should be worked out between ATL and other digital contents, the first step is to introduce a system for ATL media. So we will focus on ATL now.

b) Set of indicators

The Ofcom proposal includes a full range of metrics (see table below copied from the consultation material), that was further developed according to the March 2015 Ofcom document.

We only point out certain parts of the framework, to which would like to add new aspects:

- in category „Availability“ we recommend
 - o our mediabrowser-approach to reliably list all news related media including the thousands of hidden long tale ones (e.g. local goventments / community print, online media, or tv, radio) with detailed descriptive parameters of them, updated the data-base regularly – see below
 - o a few diversity indicators based on the collected data – see below
- in category „Consumption“ to present the Goldfish⁶-method that is a cross-media measurement and analytical system, already works in Hungary, as well. See more details below.

³ Do tabloid newspapers, magazines or site belong to current affairs? Do weeklies, monthlies of local government belong to current affairs? What about church media, party media, etc.

⁴ Above-the-line. Please note that ATL includes outdoor and cinema, as well, which has market importance, but for measuring pluralism they are less important having no news content (however from advertising point of view outdoor should be considered).

⁵ There are many tool already developed globally, but we would consider dealing with them after the basic media pluralism methodology is worked out.

⁶ [Goldfish by Whitereport.hu & Ipsos](http://Goldfish.by.Whitereport.hu) – a common service for measuring and optimising local media on a city-vele in a cross-media way.

The proposed measurement framework by Ofcom (further developed in a few points)⁷

Category		Metrics	Description	Source	What it indicates
Availability	Availability and consumption metrics to be calculated at retail and wholesale levels to allow analysis of media ownership	Number of providers	A count of the number of entities providing news sources	Industry data → Mediabrowser	An indication of the potential for diversity of viewpoints → Diversity indicators below
Consumption		Reach	By platform – TV, Radio, Newspapers, Internet	Industry measurement systems, consumer research	An indication of the various viewpoints disseminated
			By provider within platform	Consumer research	As above. Cross media reach establishes the capability for each provider to reach the population regardless of platform. → Goldfish-method below
		Share of consumption	By platform – TV, Radio, Newspapers, Internet	Industry measurement systems, consumer research	An indication of the potential concentration in patterns of consumption. Note: This would be calculated from time spent for each platform as measured by the industry measurement systems.
			By provider within platform HHI within platform	Consumer research	As above. Note: this can be in the form of Ofcom's bespoke share of reference metric that captures the reach and frequency of consumption.
Multi-sourcing		By platform and cross-platform	Consumer research	An indication of the extent to which consumers are sourcing their news from one or a range of sources	
Impact	Personal importance	By platform By provider	Consumer research	Provides one proxy for measuring the potential to influence opinion	
	Perceived impartiality, reliability and quality	By platform By provider	Consumer research	Provides additional context to the metric of personal importance	
Contextual factors	A range to be considered depending on the situation	Qualitative factors relevant to a consideration of plurality that explain and add to the understanding of the quantitative metrics	Multiple sources. Examples of relevant factors include, but are not limited to: Internal plurality Internal governance processes Editorial policy Impartiality requirements Market trends and future market developments	Elements relevant to an understanding of plurality that are not able to be quantified by metrics.	

Category „Availability” – the mediabrowser approach

In order to have a standard media measuring system it is recommended to list all media existing, selecting news / public affair type of media that you can analyse. In order to measure and monitor ownership, we also need to know factual information. The data base has to be independent (not self-reported), regularly updated and detailed enough to build certain analysis, indicators on it. In case the data base is not complete (missing long tail media: tv, radio, print, online), not fact-based, the indicators might show misleading results.

⁷ Source: http://stakeholders.ofcom.org.uk/binaries/consultations/media-plurality-framework/summary/Media_plurality_measurement_framework.pdf#page=16&zoom=auto,-82,548. page 13.

Let us briefly present how Whitereport.hu mediabrowser works for the Hungarian media scene in order to illustrate how a cross-media data base could serve as a solid base for pluralism indicators in the Availability category.

Based on our the data collection know how developed for the mediabrowser, we collect all television, radio, print, online media, cinema and outdoor sites available in Hungary and save them in the mediabrowser software since 1st half 2010 (the service opened in 2011). Only independent information sources are used to know if a certain media exist or not, so quarterly we collect / check the availability of a given media brands. We add some very important descriptive info (data sheet) to every single media brand:

- In the Universe modul (updated quarterly) of the mediabrowser you can list
 - o full name, name versions of media brand (tv or radio or print or online or cinema)
 - o operator (content provider) – validated info from the hardest info source
 - o type of operator (by The Classification of Units by Legal Forms) – so you can count and analyse how many companies, churches, etc. operate media
 - o main activity (by NACE-codes, which is the Statistical Classification of Economic Activities in the European Community , a European industry standard classification system consisting of a 6 digit code)
 - o owner(s) of operator (hard facts by company registry data bases)
 - o language of content
 - o technical platform (e.g. analogue terrestrial broadcast radio, online radio etc.)
 - o themes („type of content" by Ofcom terminology)
 - o type of content (public, commercial, community etc)
 - o frequency of appearance etc.
- In the Financial modul (updated annually) of the mediabrowser you can get key company figures such as
 - o annual net revenue
 - o profit after tax
 - o number of employees etc.
 - o annual net advertising revenue
 - o annual net distribution revenue etc.

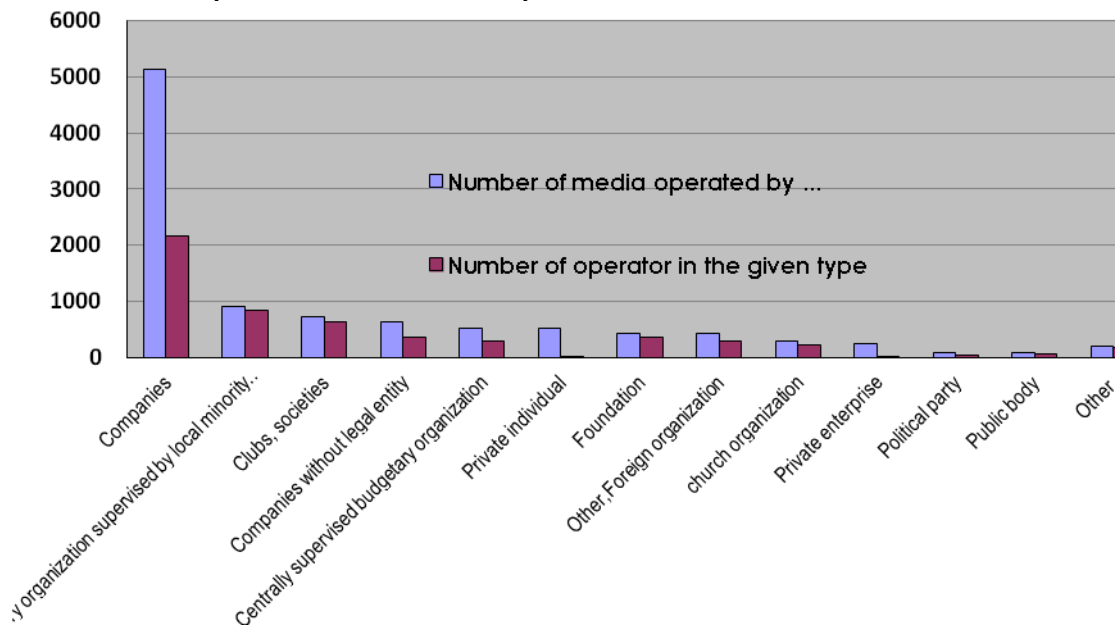
By the sytem briefly described above, the mediabrowser provides a searchable, independent cross-media data base with „hard data". Since 2010 mediabrowser quarterly monitors the complete media scene in Hungary, including changes of ownership, platforms, supply of media brands by types, languages, revenues, profitability for more than 11.000 media and 6000+ content providers.

Why did we describe it? Because the mediabrowser allows us create Diversity Indicators, and after defining them, practically browse the answers quickly.

Example 1. : ownership patterns in Hungary.

Media brands (not only news type) operated by different types of organisations in Hungary.

Source: Whitereport.hu mediabrowser, q3 2012



Please find below a few recommendations for indicators, to be used for news & public affairs media (so not the complete data base). Please note these are only initial thoughts, and probably more experienced theoretical professionals should challenge it.

Diversity indicators

No. of media / owner	By languages	Regionality (national vs regional vs local)	Type of operators (content providers)	Number of operators (content providers) ⁸
• tv				
• radio				
• print				
• online				
TOTAL	A : B : C	National regional : local	Companies : Parties : Chuches : Budgetary organisations... : Foundations	Concentration level⁹

Diversity indicators can easily present how fragmented the news/c.a. content is at a given time period, and how it changes time to time. Can monitor if there is any negative trend that makes diversity narrower, e.g in language diversity or locality or fall in certain operator types.

⁸ Please note that based on the mediabrowser's aggregated financial data of media companies further ownership indicators can be developed. Here we only focus on number of operators.

⁹ Can be investigated in more complex ways (HHI, etc.), this is just a very basic check point.

Example 2. Referring to some of the suggested Diversity indicators above, the Hungarian media landscape looks like this way (not only for news media):

- Language diversity in q2014: low
 - o No. of Hungarian media vs non-Hu: 96% : 4%
 - o Non-Hu language ratio could also be counted.
- Ownership diversity in q4 2014
 - o On operator level: diversified (6700 entities operate more than 11,000 media in Hungary)
 - o On owner level: diversified
- Regionality diversity in q4 2014: diversified
 - o 40% national : 40% local or regional : 20% not identified

Category Consumption – the Goldfish approach

Consumption indicators can also regularly monitor the weights of media groups, and might call attention for concentration issues.

Following our wider cross-media approach, we also believe that tv, radio, print, online (and cinema) media consumption should be measured all in one. As the commercial media market is strongly based on the media type specific, „currency” measurements - separate television viewing, radio listening, print readership, online media etc. measures -, the cross-media measurement should be an additional measurement to complete the line from an additional point of view to support media ownership monitoring by comparable consumption data. Opposite to the frequent currency measurements we suggest to conduct cross-media research for pluralism check only annually or in every second year.

However, the cross-media measurement should be closer to the currency measurements to be „harder” than „how often do you ...” type of data.

We find the best approach to this is the „the after” type of quantitative survey (well-known in non-tv media audience research), that provides comparable daily reach by media for tv, radio, online and dailies, weekly reach for weeklies etc.

By the Goldfish method, data can be used in optimisation and analytical softwares so cross-media consumption by media, cumulated reach by owners and many other type of analysis can be made. This would result a very solid base for measuring cross-media consumption.

Example 3: Goldfish for local cross-media measurement

For Hungary we developed a local media tool called [Goldfish by Whitereport.hu & Ipsos](#). The name comes from our preconcept that local media - except a few big bish like county newspapers – are small in terms of reach. However we were aware of the number of local media by the mediabrowser (more than 100-100 media on average in each county city), and that in Hungary people are local patriots, we did not suppose that long tail media could be as strong as the measurement proved.

In the so far measured 11 county towns it became clear that the cross-media portfolios of local governments can reach very significant ratio of local people, getting competitors of professional print-online publishers. Some independent local radios and sites also proved to be competitive. This suggest again *not to underestimate the impact of long tail media on influence.*



We suggest to investigate the Goldfish way to apply for national media consumption measurement. It might be complementary measure for media pluralism purposes, on the top of the industry currency researches.

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

We agree to include online content to include in the measurement of media pluralism. See Point 1.

3. Do you agree with our approach to media ownership? If not, how could media ownership be better captured?

Measuring media ownership also starts with listing and monitoring media brands, their providers and owners of the providers in a wide, cross-media approach and updated regularly – see mediabrowser part at Point 1, as the Hungarian mediabrowser provides such info in minutes in a structured way.

There might be additional indicators applied in this area.

Let us emphasize it again that it is important to collect both for-profit and not-for-profit media with their providers, because both types might have high reach of population, strong influence on opinions.

4. Do you agree with our approach to measuring cross-media consumption? Are there other metrics which might better capture cross-media consumption?

Please see point 1.

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

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

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7. Do you agree with our approach to measuring plurality in the UK nations? If not, how could plurality in the nations be better measured?

Please see Point 1.

Thank you for your attention!

Contact

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