

Guardian Media Group response to the Ofcom consultation on a measurement framework for media plurality

About Guardian Media Group

1. Guardian Media Group (GMG) is one of the UK's leading commercial media organisations. Wholly owned by The Scott Trust Ltd, which exists to secure the financial and editorial independence of the Guardian in perpetuity, GMG is one of the few British-owned newspaper companies and is one of Britain's most successful global digital businesses, with operations in the USA and Australia and a rapidly growing audience around the world.
2. GMG's core business is Guardian News & Media (GNM), publisher of theguardian.com and the Guardian and Observer newspapers. As well as being a leading national quality newspaper, the Guardian and The Observer have championed a highly distinctive, open approach to publishing on the web and have sought global audience growth.
3. In 2014, the Guardian was named newspaper and website of the year at the Society of Editors UK Press Awards and is the most trusted news source in the UK (Ofcom digital media report, 2014). In May 2015 it won Website of the Year, Editorial Campaign of the Year, App of the Year and Product Team of the Year at the British Media Awards. Its journalistic excellence was also recognised when it became the first news organisation of non-US origin to receive the Pulitzer Prize for its investigation into NSA surveillance. The Guardian is also known for its globally acclaimed investigation into phone hacking, the launch of its groundbreaking digital-first strategy in 2011 and its trailblazing partnership with WikiLeaks in 2010.
4. According to the latest National Readership Survey Print and Digital Data (NRS PADD + mobile) report, Guardian News & Media's titles - the Guardian, The Observer, and theguardian.com - attract over 16 million readers in the UK each month.
5. In 2011, GMG launched its 'digital first' business strategy, with the aim of transforming itself into a world-leading converged-media company. theguardian.com since has grown to become the world's second largest quality English-language newspaper website in the world, with over 120 million unique browsers each month. Since launching its US and Australia digital editions in 2011 and 2013 respectively, traffic from outside of the UK now represents two-thirds of the Guardian's total digital audience. The Guardian now attracts over 30 million readers in the US, and - two years after opening its Sydney office - commands a 21% share of the Australian news market, as the country's 4th most popular newspaper site brand.

Introduction

6. GMG is delighted to comment on Ofcom's proposed advice to the Secretary of State for Culture, Media and Sport on the measurement framework for media plurality. Below we set out some comments on the indicators that Ofcom has recommended to DCMS to inform the measurement framework to which the Government has committed.
7. As Ofcom recognises, the media industry is currently experiencing rapid change, in part as a result of the impact of digital technology on the business of creating and disseminating journalism. Figures from the Internet Advertising Bureau¹ show that in 2014, Digital adspend continued to show double-digit growth in the first half of 2014 with a new record high of £7.194 billion. Mobile advertising grew 63% to £1.62bn in 2014, accounting for 23% of all digital ad spend and 56% of social media spending marking a significant increase on the 16% figure reported in 2013. Yet at the same time, UK adults are prepared to pay 92p a month to access news websites, less than email, search engines or online video.
8. GMG is pleased that Ofcom has noted the crucial importance of ensuring that any measurement framework is sensitive to this rapid technological change and the proposal that *"the consumption metrics themselves should be reviewed as part of any media plurality review, to take account of other consumption metrics as they become relevant and available"*.²
9. We need a robust and sophisticated measurement framework in order to understand this evolving environment. But GMG also believes that this measurement framework should be part of a greater range of legislative and regulatory measures that promote a diverse and plural media in the United Kingdom.
10. From UK Parliamentary Committees to Ofcom, from senior politicians across the political spectrum to Lord Leveson, many have found fault with the current limited plurality regime and proffered potential remedies. In GMG's response to the Lords Communications Committee Inquiry into Media Plurality (the "Lords Committee Plurality Report") we set out some of the most important analysis and support for reform from UK stakeholders.³

¹ <http://www.iabuk.net/about/press/archive/iab-pwc-study-digital-adspend-up-14-to-record-72-billion>

² <http://www.parliament.uk/business/committees/committees-a-z/lords-select/communications-committee/inquiries/parliament-2010/media-plurality/>

³ <http://www.parliament.uk/documents/lords-committees/communications/Mediaplurality/MediaPluralityEvidence.pdf>

Changes To Plurality Rules

11. Since the publication of the Leveson Inquiry, there has been a lack of clarity about which organisation should be responsible for the development and implementation of policy and what action should be taken to change the rules which govern media plurality. As Ofcom's consultation states, it is for the Government and Parliament to address the question of what constitutes 'sufficient' media plurality. It is also for these two bodies to set out legislation that gives Ofcom the powers and guidance to be an independent protector of plurality.
12. As such, GMG is supportive of the broad tenor of the Lords Committee Plurality Report⁴, which states that there should be changes to the framework for regulating the ownership of media enterprises including a statutory periodic review of the plurality of the media markets undertaken by Ofcom every 4-5 years.
13. Guardian Media Group has previously set out arguments that too much power currently resides with the Secretary of State in media mergers leaving them open to political interference.⁵ GMG has first hand experience of the weaknesses in the current system and the potential for the politicisation of the merger process to result in improper outcomes. In his evidence to the Leveson enquiry on plurality, the Guardian's Editor in Chief, Alan Rusbridger explained that:

"a huge amount of evidence has been laid before the Leveson Inquiry of the private lobbying and social/political contacts aimed, partly or wholly, at securing a favourable regulatory framework for News Corp. In the period before and during the BSkyB bid there were, it now emerges, (and solely because of a public inquiry) thousands of contacts, drinks, meals, phone calls, text messages and personal meetings between senior News Corp staff and executives and senior politicians... In his opening submission for Module 3, on 14 May, News International's counsel effectively invited the Inquiry to disregard what he derided as the telepathy theory of unwritten or unspoken deals. We say the opposite: that it is essential to take account of the likely mutual understanding of matters which did not need to be articulated or written down."

14. GMG supports the proposal in the Lords Committee Plurality Report that Ofcom should take a key role in deciding whether specific media transactions can go ahead in the case of a media merger. The report provides a thoughtful proposal for a new process in which Ofcom and the competition authorities contribute to the transaction assessments, with Ofcom undertaking a plurality review and managing the production of a Public Interest Decision.

Consultation questions

⁴<http://www.parliament.uk/business/committees/committees-a-z/lords-select/communications-committee/inquiries/parliament-2010/media-plurality/>

⁵ In our written submission to the Lords Committee Plurality Inquiry.

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

The benefits and limitations of Ofcom's procedural approach

15. GMG agrees with Ofcom that there are a number of technical and systemic limitations (such as the impossibility of comparing various industry metrics on a like for like basis) in the proposed framework which mean that even the best versions of these indicators are 'imperfect'.⁶ In some areas, these imperfections risk resulting in a very blunt tool indeed.
16. GMG's experience in measuring readership teaches us that statistical headlines and blunt measurement tools can hide important and relevant commercial realities and consumer behaviour. They are likely to be insufficient to properly analyse and understand media plurality in the context of an expanded and complicated, increasingly digital ecology of news and current affairs.
17. It is not clear to us to what extent the measurement framework will rely on consumer survey data or whether it will learn and borrow from other industry tools. In the next section, GMG sets out various pitfalls and inaccuracies that are likely to arise for online measurement if sources such as analytics tools are neglected.
18. Another weakness is that the measurement framework does not differentiate between types of content: for example, left-wing vs right-wing, or 'quality' vs 'tabloid', to use industry differentiators. If the aim is to safeguard a diversity of viewpoints, then it is important that the types of viewpoints represented in content is noted, rather than just the number of sources. A consumer survey approach would be unlikely to make such distinctions, but this might be addressed in the 'Contextual Factors' section.
19. GMG is sympathetic to the real limitations that the consultation outlines, and believes that as a result, any framework based on the current proposals should be presented with a prominent health warning. GMG agrees with Ofcom that, while measuring media plurality is likely to be based on quantitative evidence and analysis wherever practical, "a high degree of judgement is [also] required".⁷
20. It is a truism that the answer to 'Is this framework adequate for its purpose?' depends on what the purpose will be. As a snapshot of the industry, to allow policymakers to 'take the temperature' of a market and allow further investigation, this framework could offer useful insights. However, if the framework is to be used as the basis for the development policies that

⁶ For example, cross media metrics, as described on page 2 of the consultation.

⁷ p21 of the consultation.

seek to intervene in the market, then GMG would be concerned about the flaws which are documented within the consultation itself and in our response.

21. The news media industry is itself currently debating the relevant metrics for measuring its own sector and how to quantify the scale and impact of its content. In October 2014, Newsworks – the marketing body for national news brands – issued a Request for Proposals, inviting a range of research and data analytics providers to bid to supply a new multi-platform measurement system for newspaper and consumer magazine brands with the aim of introducing a new system of measurement across multiple platforms from early 2016. The aim of the new system is to establish a credible, comparable, scaleable, tradeable and transparent set of metrics that work across multiple platforms.
22. Whether or not the methods in the consultation give a sufficiently accurate and useful picture, the framework does not address various issues which are of great importance to plurality in the UK. These are referred to throughout this response and summarised in the ‘Contextual Factors’ section below. In this section we set out two key points: influence over the political process and sport. GMG believes that these should be considered qualitatively under the section called ‘Contextual Factors’.

Influence over politicians

23. Ofcom sets out two methods by which plurality improves the functioning of a democratic society: firstly plurality creates ‘informed citizens’ and secondly it prevents ‘too much influence over the political process being exercised by any one media owner’. Ofcom states that ‘The focus of our work to date has been on the first of these (informed citizens), as this goal helps mitigate the second (influence over the political process) and is also more aligned to our current duties - to further the interest of consumers and citizens in relation to communications matters’.
24. While we recognise that measuring political influence is not as squarely within Ofcom’s traditional role as other elements of this project, this is not a good reason to exclude it from direct assessment as part of the framework. As one of two key objectives of plurality policy, an attempt should be made to directly address this question. Indeed, we note that, under the heading of contextual factors, Ofcom intends to measure “the potential power or editorial control exercised by owners/proprietors within commercial organisations”. Therefore we suggest that using equivalent judgements it should be possible to examine the scale of political influence.
25. Indeed, in his evidence to the Leveson Inquiry Ed Richards, then Chief Executive of Ofcom, said:

“I think we can now see there is another analysis [of measures for media plurality], which is what influence in the political process might I have by virtue of a control of particular media assets. And I think we will also want to look at that, whereas in the past we've tended to concentrate on the former, but I think it's now clear that that needs sufficient attention as well.... I think if we look at those issues [Ofcom's decisions in the News Corp / BSkyB merger] again today, we would place the same amount of emphasis on the diversity and the range of plurality and the provision of media, but I think we would also place more emphasis, in light of events, on the risk to the democratic process of the influence of concentrations of media power. I think it would be impossible for us not to do that, given what has emerged over the last year or two.”⁸

26. Further, various academics and industry figures continue to argue that sections of the newspaper market and individuals within it continue to hold significant power over political parties. For example, Dr. Natalie Fenton, Professor of Media and Communications, Goldsmiths, cites that 60% of the UK national newspaper market's coverage of the election campaign has been pro-Conservative, with only 33% of prospective voters favouring Conservative at that time, and according to contemporary polls. This coincides with the Conservative decision not to include commitments on plurality within their 2015 Election manifesto while Labour and the Liberal Democrats both pledged to act.⁹ These facts alone do not prove political influence. But a report that addresses the influence of media organisations over the political process would not be complete without at least referring to these kinds of commentary and statistics.

Sport

27. The Oliver & Ohlbaum report on Measuring Online News Consumption and Supply (the “O&O” report) examines question of classification of content as news and raises questions about the classification of online news, specifically the exclusion of sport. The O&O report raises the question why the “BBC Sport site – which is essentially news, and indistinguishable in output from the sports sections of many news sites – is not counted”. GMG has consistently argued that a narrow view of news and current affairs that excludes sport underestimates the impact sports coverage has on the ability of news brands to attract and retain audiences to their publications, apps and websites.

⁸<http://webarchive.nationalarchives.gov.uk/20140122145147/http://www.levesoninquiry.org.uk/wp-content/uploads/2012/02/Transcript-of-Afternoon-Hearing-1-February-20121.txt>

⁹<http://www.mediareform.org.uk/get-involved/who-cares-about-excessive-concentration-of-media-ownership-what-do-the-election-manifestos-reveal>

Further analysis from [Loughborough University Communication Research Centre](#) reveals how the Conservative Party has not only had the greatest amount of press attention directed to both the party and its leader but has also been directly quoted the most.

28. In its response to DCMS' 2013 consultation on measuring media plurality, GMG highlighted comments¹⁰ by Chief Executive, Andrew Miller that:

“One of the biggest drivers to the news category is sport... it is the biggest driver of traffic online, and it is one of the biggest drivers to people coming to a newspaper. By buying up rights to sports, one can, rightly, make sure that people come to your brand in a news environment, but that locks others out. That is an economic decision, as an indirect knock-on to plurality... If certain media companies were able to buy all the rights, or negotiations were done and we could not get in there, we could still write about football, I am sure, and we would still have other arrangements but, over time, it would gradually start putting pressure on our audience and on our commercial interests, which would risk reducing our voice.”

29. GMG was among a number of publishers concerned about the content of an article published in Press Gazette in July 2014¹¹ about an exclusive media partnership between Newcastle United and the Sun, which saw the Sun being the “only newspaper to be invited to a press conference...” followed by a “Sun article by the newspaper’s City editor headlined: “Why we should love Mike Ashley”.

30. The potential for large converged media groups to pick up ancillary rights to content as part of larger contractual negotiations (i.e. short near real time clips as part of much larger live Premier League negotiations) and to purchase exclusive access to football grounds should be examined as part of any broader contextual examination of media plurality.

31. A broader and pervasive concern for news media brands is the ongoing effort by leading sports governing bodies to push the European Commission to introduce a new intellectual property right in connection to the reporting of sport. The objective of these efforts appears to be to make it easier for sports governing bodies to effectively exclude news media brands from reporting on sport from within sports grounds and the surrounding environs, and drive greater exclusivity around the reporting of sport.

32. In February 2014 the European Commission published a detailed “Study on sports organisers’ rights in the European Union” which “analysed the right to short reporting as enshrined in Article 15 AVMSD and as implemented in the national regulatory frameworks of the 28 Member States of the European Union.”¹² The study found that “*the case often made by sports organisers for express recognition of a “sports organisers’ right”, which would take the form of a special neighbouring right or sui generis right, is therefore not very strong*”¹³.

¹⁰ <https://www.gov.uk/government/consultations/media-ownership-and-plurality>

¹¹ <http://www.pressgazette.co.uk/sports-journalists-cry-foul-amid-suspicious-sun-has-become-newcastle-united-media-partner>

¹² http://ec.europa.eu/sport/news/2014/docs/study-sor2014-final-report-gc-compatible_en.pdf

¹³ Ibid, page 178

33. Given the importance of sports coverage to the future of news brands at a local, national and global level, it is essential that sport should be included in any measurement framework. We also believe that it is crucial that Ofcom plays an active role during the forthcoming reopening of the AVMS directive in Brussels, to preserve news media's right to short reporting, as enshrined in article 15 of the AVMS Directive.

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

34. GMG is pleased that Ofcom intends to measure consumption of digital news and agree with the various distinctions that Ofcom have drawn in sections 4.26 - 4.31, such as between direct and indirect referral and between content originators ('wholesale' providers) and intermediaries.

35. The digital news ecology is complex, featuring a number of interrelated issues including:

- a. What are the right tools to accurately assess and measure what the consumer experience or behaviour might be?
- b. What are the roles and relationships of the various parts of the new digital economy, including online news content creators, aggregators and digital intermediaries and what is the effect of those roles upon plurality?
- c. To what extent are we able to assess whether digital intermediaries who perform a 'retail' function also exercise an editorial or editorial-like function, and what effect does that have on media plurality?

Measuring online

36. On (a), GMG would welcome further information about which measurement products will be used and what metrics will be used. The consultation does not contain much detailed information about what variables will be measured other than the commitment to rely on 'claimed use from survey data, considered alongside robust web measurement products'.

37. A heavy reliance on consumer survey would be particularly inaccurate for online measurement. GMG's experience is that consumer recall of interactions with specific newsbrands in a digital world can be poor for the purposes of surveys, whereas consumer recall or even over-emphasis of known and trusted brands is much greater. There is therefore a 'long tail' of online players who tend to be ignored in such surveys, or at least underweighted. As such, garnering a true picture of consumption through consumer surveys is difficult.

38. GMG uses a variety of online and combination measurement tools, measuring page views, browsers and users, across the UK and internationally. GMG is able to measure quantitative data about audience loyalty, length spent reading an article and referral patterns, among other things. GMG has highly experienced audience and measurement teams that work with metrics such as Comscore, NRS-PADD, ABC and the Newsworks metric and would be delighted to assist Ofcom in developing its framework if helpful.

The roles of wholesale and retail online

39. On (b), GMG welcomes the decision to measure media consumption around online news content creators, aggregators and digital intermediaries. Growing policy attention is being paid to the relationship between digital intermediaries and news content creators. A number of businesses operating in and around the news media sector in Europe are currently involved in legal action focused on prosecuting the case against Google's alleged abuse of its dominant position in search. As Ofcom will be aware, the European Commission is also undertaking an in depth policy study¹⁴ into the role of platforms as part of its recently announced Digital Single Market strategy.

40. GMG continues to pursue commercial discussions with such intermediaries, such as the recently announced Digital News Initiative with Google, and strives to create shared value for digital news media businesses and search and social platforms. However, this desire to seek commercial solutions does not negate concerns that GMG has about the growing size and influence of digital intermediaries over the way in which digital news media businesses are able to monetise investment in high quality content.

41. By way of background, using GMG analytics tools we are able to see the emerging dependence of news publishers on digital platforms to distribute content. Around 50% of Guardian traffic now comes from search and social platforms, with an overwhelming majority of that traffic coming from the Google and Facebook. Furthermore, as the consumption of news shifts rapidly to mobile devices, this places the likes of Google and Facebook in an even stronger market position.

¹⁴ http://ec.europa.eu/priorities/digital-single-market/docs/dsm-swd_en.pdf

Net Mobile Internet Ad Revenue Share Worldwide, by Company, 2012-2014

% of total

	2012	2013	2014
Google	52.6%	49.3%	46.8%
Facebook	5.4%	17.5%	21.7%
Twitter	1.5%	2.4%	2.6%
Pandora	2.6%	2.1%	1.7%
YP	2.9%	2.1%	1.6%
Millennial Media	0.8%	0.8%	0.7%
Other	34.2%	25.8%	24.9%

Total mobile internet ad revenues (billions) \$8.76 \$17.96 \$31.45

Note: net ad revenues after companies pay traffic acquisition costs (TAC) to partner sites; includes display (banners and other, rich media and video) and search; ad spending on tablets is included; excludes SMS, MMS and P2P messaging-based advertising

Source: company reports, 2012 & 2013; eMarketer, March 2014

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www.eMarketer.com

42. A recent survey by eMarketer.com of the change in global mobile advertising revenues between 2012 and 2014 found that Google and Facebook now account for over 2/3 of the global market. Furthermore, both of these platforms have a far greater end to end understanding of consumers as a result of owning the mobile operating system in the case of Google, and the network effects associated with Facebook's position as the preeminent social network, which places them in an unparalleled position of control over user data and understanding.
43. In a world in which Guardian content is increasingly read outside of an environment that GMG directly controls – so-called off platform consumption of content - GMG is realistic that ultimately we are competing with digital intermediaries in the business of selling advertising against our content.
44. We compete on the basis of two key factors: understanding and scale. Digital publishers are in the midst of a period of experimentation to understand how they can develop a sustainable ad-funded business model in the digital world. As they seek to understand their user base, the presence of the very largest digital intermediaries, who own vast data pools about each individual and a mountain of data about their user base in aggregate, means that digital publishers will only ever have a fragment of the insight that digital intermediaries have about the consumers of digital news media content. Furthermore, the scale of these platforms and their global reach means that they are increasingly offering advertisers efficiency in spending across countries and territories.
45. In a March 2014 paper, the EU Data Protection Commissioner Registrar cited the Google/DoubleClick merger as one where a purely economic assessment could, and should, have been supplemented by considerations around *“how the merger could have affected the users whose data would be further processed by merging the two companies’ datasets, conceivably to provide services, perhaps bundled or even tied to the simple search service, that were not envisaged when the data were originally submitted. ... It therefore neglected*

the longer term impact on the welfare of millions of users in the event that the combined undertaking's information generated by search (Google) and browsing (DoubleClick) were later processed for incompatible purposes.'

46. This theme was picked up again during the pre-appointment hearing of the new EU Competition Commissioner, Margrethe Vestager. Vestager said she *"very much recognise(s) the profile of big data as being the new currency of the Internet. Here we have something extremely valuable because, when you have access not only to one person's data but to millions and billions of data, then you can make analysis which is completely different from what you were able to do five or ten years ago, because you have new tools... I think it is very important for us to stay very sharp and to understand what is actually happening when these markets develop."*
47. Any measurement tool developed by Ofcom must be alive to the plurality implications of further consolidation within the digital world, and the potential impact of such mergers on asymmetric power relationship between digital intermediaries and news publishers who increasingly rely on those intermediaries to distribute and monetise content. It is clear economic regulation alone will not be enough to properly understand the potential implications of the organic growth or mergers of digital intermediaries on the availability of high quality UK content. Ofcom's media plurality measurement tool should capture these concerns in the 'Contextual Factors' section under the heading of 'market trends'. GMG would be delighted to share its experiences with Ofcom should that be helpful.

Digital intermediaries and editorial control

48. In the context of answering (c), digital intermediaries do have editorial control of the content consumed via their platforms. In a speech to the Reuters Institute in November 2014, the academic, former Guardian journalist and current Scott Trust board member Emily Bell suggested that, as opposed to being neutral, "Every time an algorithm is tweaked, an editorial decision is being made." Bell illustrates the power and influence this gives Facebook and other digital platforms over society and democracy by reference to another experiment. The lexicon of editorial control has been replaced by new, more technical, language (for Facebook this is "product policy"), which determines how the relevant algorithms can be tweaked. Whatever language is used, the operators of these platforms have the ability to control and influence the content viewed by its users.¹⁵
49. It is important to recognise that the commercial prioritisation of news media content is already happening, and will become increasingly commonplace as publishers recognise the power of Facebook in aiding the distribution of content. There is growing academic interest

¹⁵ The recent revelations about psychology experiments conducted by Facebook on a proportion of its users demonstrate a latent ability to suppress and promote news content on the basis of unclear subjective criteria. In which certain emotional words were hidden from users' feeds and a demonstrable change in behaviour was observed <http://www.theguardian.com/technology/2014/jul/02/facebook-apologises-psychological-experiments-on-users>

in the concepts of algorithmic power and algorithmic accountability and work is currently underway at the TOW Centre¹⁶ to produce analysis techniques that would allow measurement to be undertaken. The European Commission's recent Digital Single Market proposals outlined plans to digital intermediaries for greater transparency around prioritisation within these algorithms, alongside a deeper look into issues such as vertical integration, leverage, and supplier access to data held by those intermediaries.

50. As the Commission's investigations continue from a Europe-wide perspective, GMG believes that Ofcom should investigate this issue and its influence on media plurality, including its findings in the 'Contextual Factors' section.

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

51. Understanding media ownership is key to the understanding of the question of "influence over the political process... by any one media owner", one of Ofcom's stated tests. GMG agrees that having the flexibility to measure both the retail and the wholesale level, and aggregate news sources with common ownership, is important in understanding the ownership of sections of the value chain. We understand that this includes entities such as aggregators and digital intermediaries.
52. Ofcom intends to measure ownership where a relationship of full control is seen as one where the owner has more than 50% of the voting rights of a news service. However, the relevant indicator here is de facto control rather than a narrow interpretation that focuses on legal voting rights. Notable instances of de facto control could be included in the 'Contextual Factors' section.

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

53. GMG believes that, broadly speaking, Ofcom's creation of a share of references metric provides a useful measure of cross media consumption. Our concerns with measuring online are set out above.

¹⁶ <http://www.nickdiakopoulos.com/projects/algorithmic-accountability-reporting/>
<http://towcenter.org/event/workshop-algorithmic-transparency-in-the-media/>

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

54. As noted above, the framework should include a way of capturing the impact of some news sources upon elites and decision makers in order to address the second goal of plurality under 2.1 of the consultation.

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

55. Above, GMG has set out the following areas which we believe should be referred to as part of the relevant contextual factors:

- a. Type of viewpoint / context (para 8)
- b. Influence over politicians (paras 23 - 26)
- c. Ownership of sports rights (paras 27 - 30)
- d. Present and future developments and convergence in digital and online platforms (39 - 47)
- e. Editorial role of digital intermediaries (paras 48 - 50)
- f. Media ownership (para 52)

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

56. GMG agrees with this approach.