

Title:

Mr

Forename:

Stephen

Surname:

Crowther

Representing:

Organisation

Organisation (if applicable):

UK Independence Party

Email:

What additional details do you want to keep confidential?:

No

If you want part of your response kept confidential, which parts?:

Ofcom may publish a response summary:

Yes

I confirm that I have read the declaration:

Yes

Additional comments:

Question 1: Which of the approaches described above do you think is the appropriate framework within which Ofcom should assess the evidence of parties? past electoral support and current support in Great Britain-wide elections? If you do not agree with any of these approaches, please explain why and, if appropriate, suggest an alternative.:

UKIP believe that Option 1 is appropriate. Over the past four years, particularly in European Elections, but also in local elections and Westminster by-elections, UKIP have shown

ourselves to have significant support across the United Kingdom: enough to warrant inclusion as a major party both at European and local election level. Furthermore we believe that the growth of our support in the three home nations is sustainable, and should therefore be recognised as such in the allocation of PEBs. Continuing opinion polls, and weekly by-election results, bear this out.

We support Option 1, but with the caveat that in Scottish polls that specifically talk about the European elections UKIP are polling significantly higher than the 3.8% cited in the consultation. In this instance OfCom is comparing apples (Westminster polling) with pears (European Parliamentary support).

Question 2: Do you have any comments on Ofcom's current preliminary views in paragraphs 2.36 to 2.42 above on the effect of the application of the various methodologies to decide the Ofcom list of major parties ahead of the 22 May 2014 elections?:

We feel that the methodology used at present by OfCom has the impact of driving out newcomers and provides a political inertia bias. Whilst Ofcom recognises that UKIP has, in the last two European elections, come 2nd and 3rd in a national vote, it still feels the need to point out that we are not a major party, and it is in some way generous to include us as such. OfCom also makes clear that it is keen to return to the status quo ante immediately after the European Parliamentary elections, dismissing UKIP from the top table as soon as is practical.

We believe that the range of elections in the last two years, including the County Council elections of May 2013, and a series of Westminster by-elections, have shown that when real votes are cast we outperform the opinion polls, often by at least 10%. This is noticeable particularly in council by-elections over the period, where, even including Scottish by-elections, UKIP are averaging over 20%.

To that end we feel that your methodology significantly downplays the current political reality. UKIP's actual electoral support has been consistently underestimated for many years (with actual results running ahead of polling predictions) due to weighting methodologies which constantly refer backwards. In the Eastleigh and South Shields by-elections, our 28% and 24% of the vote respectively showed that we can achieve around 25% of the vote in both the North and the South. This was echoed in the 2013 County Council elections (24%) and has been consistently replicated week-by-week in local authority by-elections throughout the year. However, almost all national polling organisations failed to predict this level of support and continue to do so.

The breadth of our support across the country puts us at a significant disadvantage against parties whose support is patchy and regionally biased. This should not be a reason to handicap a party which is currently representing the views of between a fifth and a quarter of British voters.