

Media Ownership Rules Review
Ofcom
Riverside House
2a Southwark Bridge Road
London
SE1 9HA

17 September 2009

Dear Sir/Madam,

Media Ownership Rules Review Consultation

Consumer Focus Scotland welcomes this opportunity to respond to Ofcom's consultation on local media ownership rules.

We are not responding in detail on the proposed changes that Ofcom is suggesting, but instead we offer some general comments and feedback on the potential implications that these changes might have for consumers in Scotland.

As a result of devolution a wide range of key political, economic, social and cultural decisions affecting people in Scotland are now taken at Holyrood rather than Westminster. In many policy areas the main focus of political debate for Scottish people is now the Scottish Parliament. This is reflected in the news and current affairs content that is produced in Scotland and which reports on these debates. There is therefore a distinct Scottish media market which provides people in Scotland with in-depth information, coverage and opinion about the key political issues affecting many important areas of their lives.

We recognise the argument set out in the consultation document that commercial radio, television and newspaper providers currently face a range of significant economic challenges, and that these challenges are particularly acute amongst local providers. We therefore understand that the liberalisation of local cross-media ownership rules, and the removal of local radio service ownership rules and national and local radio multiplex ownership rules, may help to consolidate local service provision and improve the viability and sustainability of local providers in the longer-term. This can be beneficial for consumers, who will continue to enjoy access to local news, information and opinion. This is particularly critical in Scotland given the central role that Scottish media providers have to play in informing the Scottish public about the key political debates taking place in Scotland.

However, given the critical role that the Scottish media has to play in informing the Scottish public about these key Scottish policy debates, it is essential that Scottish consumers have a choice of different media providers and can access a variety of sources of news, information and opinion on these issues. It is therefore vital that the impact of any relaxation in ownership rules is closely monitored and is regularly tested, to ensure that Scottish consumers have access to a plurality of providers and can exercise a suitable degree of choice in selecting the local media providers that they use.

Furthermore, we believe that any relaxation of local media ownership rules must be accompanied by closer scrutiny of the content that these providers produce. The relaxation of ownership rules offers local media providers in Scotland the opportunity to consolidate and improve their local term sustainability. However this may reduce competition within media markets in Scotland, and may act as a disincentive for providers to improve the quality of the outputs that they produce. Therefore, if local media ownership rules are to be relaxed, then we ask that Ofcom considers how it can more closely scrutinise the output delivered by local media providers in Scotland, to ensure that what is produced is of high quality and that it represents a plurality of different views and opinions from across Scotland.

I hope that the points made in this submission are helpful. Please do not hesitate to contact me should you wish to discuss any aspect of this submission further.

Yours faithfully,

A handwritten signature in black ink that reads "Martyn Evans". The signature is written in a cursive style with a large initial 'M'.

Martyn Evans
Director