

Our Ref: SR/BB16

27th June 2007

Peter Davies
Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA

Dear Mr Davies,

The Newspaper Society represents the regional newspaper industry. A number of our members also have radio interests, including the 28 radio stations owned by local newspaper companies.

Regional newspaper publishers have been instrumental in the development of commercial local radio from its earliest days. The Newspaper Society led the regional newspaper industry's case for liberalisation of cross-media ownership rules to allow local newspaper companies to own local radio stations in their titles' core circulation areas. The industry therefore welcomed the Government's progressive relaxation of the cross-media restrictions in successive Broadcasting Acts and the Communications Act 2003, in recognition of the changing media landscape.

However the speed and intensity of those communications changes now warrant further legislative reform. As Ofcom has acknowledged, any local media company already faces fierce competition from a multitude of rivals for the attention of the local audience and local advertisers. Its competitors extend far beyond the editorial and commercial activities of other national, regional and local newspaper and broadcast media companies. It is competing with the activities of private individuals, community groups, global, international, national, regional and local commercial companies and even of national, regional and local government and other public bodies. The local press or local radio station has a huge range of competitors, also intent upon the production of locally focussed editorial and advertising services through ever developing internet services, broadcasting services, mobile services, free and paid for newspapers, magazines, directories, niche publications, direct marketing via mail, telephone, household distribution, outdoor advertising and numerous other marketing services. Moreover, some of its competitors will be financing their operations with the assistance of public funds. This diverse competition will continue to develop and to intensify.

The industry believes that Ofcom should be pursuing more radical review than the cross-media ownership changes proposed in the Future of Radio. There is no need to handicap the traditional media by special media ownership controls. The local newspaper/local radio controls should be abolished. The multitude of information

sources means that plurality can now be sustained without any such specific regulation. Competition law is sufficient to deal with any commercial concerns.

The Newspaper Society and our members have raised these issues in our past discussions with Ofcom. We would be happy to arrange any meeting with interested members on this point, if you would find it helpful.

Yours sincerely,

Santha Rasaiah
Political Editorial and Regulatory Affairs Director