



MEDIA POLICY BRIEF 14

Monitoring Media Plurality after Convergence

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KEY MESSAGES

- **MONITORING.** The transition to digital media requires an upgrade in the monitoring framework for media plurality. Regulators need to understand a more complex environment, and Parliament and the public must have access to better evidence about how online and traditional media can shape public opinion formation.
- **RESEARCH.** Traditional data sources on press and broadcasting no longer permit effective monitoring of media pluralism. As a result, regulators, policymakers and the public lack crucial information on the media's impact on the civic life of the nation. Regulators should develop new tools including, but not limited to, surveys, to monitor news markets and to inform merger decisions.
- **TRANSPARENCY.** The largest publishers and digital intermediaries should have new obligations to release proprietary data to a new independent industry body, which respects consumer privacy and commercial sensitivities but which is able to use relevant data and insights which currently lie beyond the reach of academics and policymakers, to inform advice to government and the public on the state of media plurality.
- **THRESHOLDS.** Parliament should set new 'bright line' audience share thresholds at which more in-depth plurality investigations would be triggered. This would improve market certainty and reduce subjectivity in the application of public interest tests.

INTRODUCTION

Mergers & Monitoring: the existing framework in the UK and the EU

Media plurality is essential to a healthy democratic society. In the UK and elsewhere, laws, codes of practice and international treaties aim to ensure that concentrated power over the media does not undermine democracy. These include rules governing media mergers, limits on broadcast licences, and obligations on regulators and public authorities to monitor and report on the media environment.¹

The objective of these rules is to protect democracy. A plurality of views in the media has been seen as vital for a healthy democracy because it:

- (i) Gives citizens a spectrum of news and current affairs they need to make informed and considered decisions and political choices;
- (ii) Encourages citizens to consider issues from varying perspectives, with the result that the potential for polarisation in society is reduced;
- (iii) Reduces the potential for powerful media interests to control or wield undue influence over the political agenda and society at large.

More broadly, having a plurality of voices in the media has also been seen as a way of preventing media misrepresentation and suppression of information, as well as protecting the right to freedom of expression.² **Ofcom**, the UK media regulator, is responsible for monitoring and protecting media plurality and preventing any one media owner or voice having too much influence over public opinion and the political agenda.³

The Enterprise Act has provided the legal basis for the regulation of media plurality in the UK since 2003.⁴ Under an amendment to the Act, the Secretary of State for Culture, Media and Sport can issue an 'intervention notice' when he or she considers that a proposed media merger or acquisition could raise public interest concerns. This intervention notice triggers an investigation by Ofcom into the plurality concerns (and, until April 2014, by the Office of Fair Trading (OFT) into competition issues).

The public interest criteria set out in the Act calls "... for there to be a sufficient plurality of persons with control of the media enterprises."⁵

The intervention into media markets in the UK and Europe to uphold the notion of plurality has been justified because media plurality is seen as vital to a healthy democratic society and freedom of expression.

In addition to providing an evidence base for decisions on whether specific media mergers and changes in broadcast licencing might operate against the public interest in media plurality, Ofcom is responsible for *ongoing monitoring* of media plurality. Under the Communications Act (2003),⁶ Ofcom conducts a

Triennial Review of media ownership rules.⁷ This requirement for ongoing monitoring is shared by other European Union (EU) member states.⁸

In 2015, following the recommendations of the Leveson Inquiry and the House of Lords Select Committee on Communications,⁹ the Government asked Ofcom to develop a new measurement framework for media plurality.¹⁰ Whilst the Government has not made entirely clear the scope of this new framework, **efficiency demands that if Ofcom is developing a new monitoring methodology, this should be used both for transaction reviews and for monitoring.**

Alongside member state level monitoring of media plurality, the European Parliament has established a 'risk based monitoring tool' for measuring media plurality in EU member states (the Media Pluralism Monitor, or MPM),¹¹ which aims to examine potential risks through the analysis of legal, socio-demographic and economic risk factors.¹² The approach of the MPM is to identify risk factors not only in the structure of media markets but also in the legal and institutional checks and balances that are in place. Structural monitoring focuses on indicators of market concentration such that "concentration is normally considered to be high when the major four owners have a market share of above 50%, medium when their market share is between 25% and 50%, and low when it is under 25%."¹³ **Like Ofcom in the UK, the MPM has been examining how this 'risk based approach' can adapt to an environment in which not only traditional media companies, but also new digital intermediaries could be threats to media plurality across the EU.**¹⁴

1. Why new plurality measures are needed

The existing statutory framework for assessing media plurality is longer fit for purpose.

Recent debate and research has made clear that whilst the rise of online media does potentially lead to increased media plurality, it also brings new threats.¹⁵ The apparent lively openness of online distribution may shroud concentration in newsgathering, and new digital intermediaries may adopt powerful bottleneck positions in news distribution. Given these dangers, it is necessary to combine an ongoing 'plurality dialogue' with attempts to improve the evidence base for media plurality through ongoing monitoring.¹⁶ This is because the magnitude of changes in media systems – the dissemination of news and opinion in particular – is so great that the impact of these changes on media plurality remains uncertain. However, whilst expert consensus to this effect has now been supported by Parliament and Government in the UK, and also by the EU institutions, there is little consensus on the best approach to monitoring and evidence. This paper is an intervention in that debate.

According to Ofcom, there are problems with the current framework for monitoring and protecting media plurality including:

1. Public interest tests are only triggered by specific corporate mergers or by acquisitions of media enterprises. However, the risk that one provider may gain too much influence over public opinion or the media also comes from organic growth of audience share with existing or new providers, and from market exits which were not captured under the old framework.¹⁷
2. The rapid adoption of new technologies to access news meant that some material 'providers' did not fall under the old framework. Online news providers which were not also UK TV broadcasters or newspaper groups were not defined as 'Media Enterprises' under the 2002 Enterprise Act, and so did not fall under the scope of plurality reviews.¹⁸

Transaction reviews & ongoing monitoring

Ofcom's public interest test on media mergers¹⁹ and its triennial reviews of media ownership²⁰ are based on existing audience data such as that from Broadcasters Audience Research Board (BARB; TV), Radio Joint Audience Research (RAJAR) and the Audit Bureau of Circulation (ABC; newspapers). Such measures provide independent objective criteria to determine when market intervention becomes necessary, and what that intervention should be. This is important, both to minimise discretion within what can be highly political and controversial decisions,²¹ and to provide a degree of market certainty to media firms making investment decisions that may increase their share of audience.

With rapid changes in media consumption habits, existing measurements are challenged, because they see only part of the picture. On the demand side, the rise of multi-sourcing across channels and brands made possible by new technologies such as mobile and social media platforms has spread individual consumption across media, leading to a need for a new cross-channel measurement approach. On the supply side, media channels are no longer discrete silos. Most major broadcasters and publishers, like the BBC, Sky, and the Telegraph, are active across at least two platforms.²²

A common, converged, methodological approach is therefore required for both transactional reviews and ongoing monitoring, for reasons of consistency and efficacy.

2. Muddying the waters: the impact of online on media plurality

On the surface, online distribution appears to have lowered the barriers to entry within media markets, increasing potential access for consumers to a plethora of media sources and a much wider range of news providers. Whilst lower barriers to entry are indeed a *potential* outcome of online news on the media ecology, in reality, the emergence of new gatekeepers and the digital transition itself may actually result in media concentration, for example in newsgathering. With regard to this, Ofcom research from 2010 noted that most of the popular news brands that dominated the market offline – for example, the BBC, ITV and Sky – were the same brands that accounted for significant shares of the news audience online.²³ In short, it is too soon to reach conclusions about the impact of the digital transition on media plurality and there still exist powerful economies of scale and scope that lead to market concentration in some sectors.

In Ofcom's 2012 report to the Secretary of State on measuring media plurality, the regulator highlighted the ways that online media could affect media plurality.²⁴

On the positive side:

- Lower barriers to entry and virtually unlimited supply has opened up access to a diversity of news and opinions available to consumers, which encourages multi-sourcing;
- Social media, blogs and online commenting have allowed people to actively engage with news content.

On the negative side:

- The disruption to existing business models created by the availability of free online news and the shift of consumption patterns to the Internet has made some traditional publishers, particularly print publishers, go out of business;
- The so-called 'filter bubble' effect, in which personalisation of online news content by online providers and intermediaries has the potential to reduce the diversity of news consumed by individuals²⁵;
- The emergence of digital intermediaries such as search engines, social networks and app stores acting as online gatekeepers and controlling what news and information people see, and therefore potentially influencing public opinion.

The role of online media and its impact on media plurality is disputed by both policymakers and academics.²⁶ On the one hand, online distribution opens up more space for new content and

lowers the barriers traditionally associated with both publishing and reader engagement with news. On the other hand, there is evidence that the economies of scale and scope that underlie a propensity towards media concentration also operate in online news markets, with the result that the same brands dominate both online and offline, and the same risks to media plurality exist.²⁷

Given the range of opinions on this matter, and the lack of evidence to inform public policy, investment in ongoing monitoring of this matter is justified. However, the necessary methods and data to enable such an assessment are not currently available.

3. The challenge of bringing online media into a measurement framework

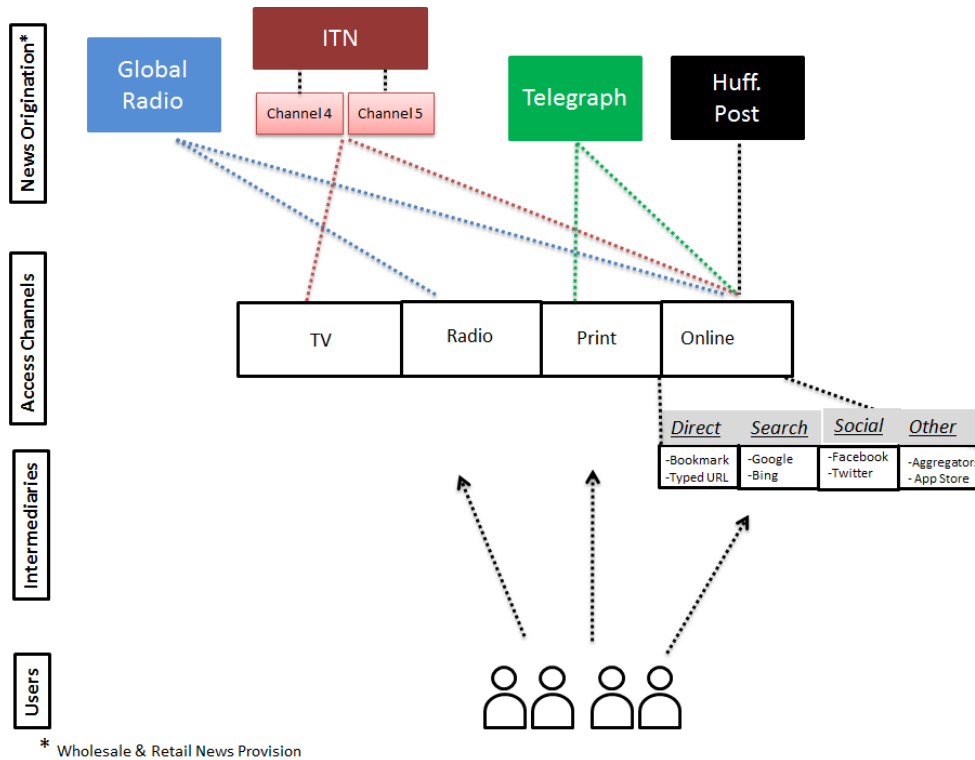


Figure 1: Measuring Consumer Multi-Sourcing.

Source: Authors

The challenges of bringing online media into a measurement framework can be summarised into **two broad categories**.

1. The first relates to the unique properties of online media. While most aspects of news traffic are potentially measurable with census level ‘analytics’, the nature of online usage today - where users spread their consumption across a number of devices - means that while aggregate usage is measurable, linking this back to individual users is increasingly difficult. Regulators and policymakers need to be able to identify plurality concerns at a demographic level, but the nature of internet usage and measurement today means this is a difficult task.
2. The second relates to multi-sourcing. Consumers actively access their news not just across internet-connected devices but also via TV, newspapers and radio, sometimes accessing these more traditional forms of media via an internet connection. Ofcom reported that the average news

consumer in 2014 used just over two platforms while 46% of news consumers used three or more providers.²⁸

Figure 1 represents a simplified version of the current news eco-system. Each dotted line represents a data node which needs to be measured in order to provide a full picture of news plurality.²⁹ News brands today not only deliver their content across multiple channels, but also deliver to other news stations. ITN is a case in point: it delivers wholesale news content to Channel 4 and to 5 News, as well as to online platforms such as Yahoo, MSN and Telegraph.co.uk.

Online news is further fragmented by intermediaries such as news aggregators, search engines and social media. While these entities largely do not produce original news, they do have the potential to impact the visibility of news by choices they make about news selection and presentation, which therefore influences what content is read by users.

Finally, the user interacts with news providers and access points in multiple ways. Users are less likely than in previous years to only watch the evening news bulletin or to regularly buy a particular daily newspaper. Today, consumers can access news via social media and apps on their mobile phone, read a variety of daily or weekly newspapers (in print or digitally), receive breaking news alerts on their mobile device, listen to radio in their car, and watch TV news bulletins in public places.³⁰

Measuring how a consumer interacts with all these different access points for news is necessary in order to get an accurate picture of the audience shares of news brands, and thus to determine whether or not any intervention is necessary in the public interest.

More specifically the challenges to measuring online consumption can be laid out as follows:

- **Different Platforms, Different Methodologies, Same Audience:** In 2013-2014, 73% of consumers accessed their news from more than one provider, while the average news consumer used just over two platforms.³¹ Accurately reporting audience shares requires the measurement of consumption on platforms with different measurement techniques. In the UK, TV audience shares are measured by Broadcasters Audience Research Board (BARB) sampling of UK TV watching households. Online unique visitors are measured via census-based web analytics systems; while radio audiences are measured by Radio Joint Audience Research (RAJAR), which gives respondents listening diaries in which to record their listening habits. To complicate matters further, many major news brands like the BBC, Sky and ITV are active across a number of platforms, so understanding their audience shares requires computing audience share in each medium in which they are active and then combining the results.
- **News Snacking:** Not only are consumers multi-sourcing, but their news consumption habits have changed. The rise of so-called news snacking, in which consumers read news across different providers and sources frequently throughout the day and in short intervals, raises questions

around the reliability of audience recall in measurement surveys.³² News today is more likely to be consumed in a constant online stream as opposed to only at specific times in the day.

- **Online Measurement Discrepancies:** Online visitors are measured by the unique cookie ID dropped in the user's browser when that user visits a website. Any new web browser is therefore automatically counted as a new user. However a new browser does not mean a new person. On the contrary, in a multi-device world where one user can access a website from a work PC, a mobile or a tablet as well as from a home laptop, the number of browsers is unlikely to be a reliable indicator of the true number of individual users. In this example, the existing methodology would class this as four users, when in reality this is one person. 39% of online news readers use more than two devices,³³ which highlights the extent of multi-device usage and the risk of potential inflation in user numbers. Similarly, there are technical challenges with measuring news consumption on mobile social media apps. By some estimates, 25% of links clicked in social media apps such as Twitter or Facebook are not measured accurately.³⁴ As these social media platforms become increasingly popular (28% of online news consumers claim to access their news via social media), there is a danger of omitting an increasingly important way that users are accessing news.³⁵
- **The pace of technological development** within online media companies is rapid. There is a risk that material shifts in consumption patterns are missed, which may then have a knock-on impact on plurality. Mobile is an indicative example of this. Driven by advancements in smartphone functionality, 24% of UK digital news consumers say their phone is their primary access point for digital news. Smartphone users are, however, more likely to rely on fewer news sources, according to the 2014 Reuters Institute Digital News Report.³⁶ These kinds of rapid market developments show how consumer shifts with implications for plurality can happen in the space of two to three years.

Bringing online media into a measurement framework is challenging. Consumer multi-sourcing requires a holistic view of what a user is consuming across different platforms which currently have different measurement methodologies and data sources. Additionally, consumers have much more complex media diets, which undermines the reliability of survey-based measurement. Finally, technical issues with online media measurement may produce significant biases, especially bearing in mind that many consumers rely on multiple devices, while there are also problems with measuring mobile social media use, which is increasingly where news consumption is taking place.

4. Ofcom's proposal for measuring plurality: Share of References

In light of the challenges of accurately estimating audience share when consumer multi-source across brands and channels, **Ofcom developed the bespoke Share of References measure, initially for the BSkyB/NewsCorp public interest test in 2010. Share of References is a unified, self-reported survey: asking a nationally representative sample of people what media they use.** Since then, Ofcom has further refined and developed this survey, including adding a frequency measure and shifting to open-ended questions to capture all news sources.³⁷

Share of References measures the reported share of individual news sources across all platforms. It is calculated by asking people which sources of news they use 'nowadays', and how frequently they use them. Frequency, or the number of times each source is cited, is used to weight the references. The share of each news provider is then estimated as the sum of all its references, expressed as a proportion of all references for all news sources.³⁸

Share of References offers a consistent cross-media metric that can be compared across platforms and brands. According to Ofcom's 2014 news consumption research report, TV had a 42% share of reference followed by the Internet at 27%. At the retail brand level, the BBC had a 43% share of references, followed by ITV at 10%.

Along with Share of References, which measures consumption or the audience share news publishers have, Ofcom's measurement framework measures plurality across three further categories:

- **Availability:** the number of news sources available in the market;
- **Impact:** the potential to influence public opinion, measured by personal importance or the perceived impartiality and quality of a news source;
- **Contextual Factors:** other qualitative factors, such as the internal plurality and corporate governance of an organisation.

While Ofcom has insisted that any assessment of media plurality will not only consider empirical measures but will also take account of other relevant contextual factors and the other categories listed above, the Share of References is arguably the single most important metric. As such, it has attracted scrutiny.³⁹ The main criticisms of the Share of References metric can be laid out as follows. Next to each charge, we have added a recommendation for Ofcom and Parliament to consider implementing to mitigate the particular disadvantage.

Disadvantages	Mitigation
Reporting bias and recall difficulties associated with self-reported usage likely to worsen in a complex converged media ecology. ⁴⁰	Triangulate survey with specific checks for identifiable biases, and control with metrics from established industry metrics such as BARB, RAJAR and web analytics. Ofcom, in its final iteration of the framework, has introduced sector-specific metrics as a sense check on claimed behaviour. ⁴¹
Neglects news flow effects and potential for strong agenda-setting influence of some media such as the press. ⁴²	Examine news flow effects using census data and agenda-setting drawing on existing academic literature. ⁴³ Census data would require more disclosure requirements on intermediaries and news publishers.
Fails to distinguish between news originators and intermediaries at a time when news consumption via intermediaries is becoming more popular.	Improve survey questions by splitting questions focused on news producers and access points such as intermediaries. Supplement with qualitative research. ⁴⁴ Ofcom has introduced a separate categorisation for digital intermediaries in its latest measurement framework. ⁴⁵
Ofcom and/or Parliament has not defined what sufficient plurality is. The absence of 'clear bright lines' brings discretion into the decision-making process. ⁴⁶	Parliament should consider setting bright lines that define the maximum audience shares a single provider could have, after which point Ofcom would be required to carry out a further investigation. ⁴⁷ As an expert advisor to Government, Ofcom should recommend what these thresholds should be.
References carry equal weight within the current framework. In reality, consumers spend varying amounts of time on different news media and discriminate between media on perceived quality. This is not captured by frequency of consumption.	Ofcom might consider asking a national representative panel of users to keep a diary of the news content they consume over a week/month. More in-depth questions could then be asked of this panel, including time spent on news sources, and detailed questions on personal importance of sources. ⁴⁸

Ofcom's Share of References, while bringing a much-needed unified methodology to the measurement of audience shares across different media sources, has also been criticised for its failure to capture the varying influence of different media. With consumers' media diets becoming increasingly fragmented and complex, it also raises questions about how accurate users' accounts of claimed usage will be. Finally, some methodological issues - especially a failure to clearly distinguish between the originators of news and aggregators/intermediaries - could lead to undercounting of the news brands most shared on these online platforms. Furthermore, news consumption on social media and intermediaries is becoming increasingly popular. On the latter point, Ofcom has moved to rectify this by separating out intermediaries from traditional news publishers in the latest version of its measurement framework (Nov. 2015).

5. Charting a way forward: no silver bullets

The search for reliable indices and metrics for media plurality has been going on for some time, and there have been some celebrated failures along the way, including expensive judicial challenges such as the Prometheus Decision in the United States which struck down the Federal Communications Commission (FCC)'s approach.⁴⁹ Therefore it is imperative that a simple and robust method is found. However there are some practicalities related to the new environment for media plurality that make such a task difficult. Firstly, the industry data available is patchy and often not reliable. Publishers and intermediaries are often reluctant to share data due to commercial sensitivities and user privacy. Measurement techniques are often not keeping pace with new methods of consuming news, such as through social media and mobile apps.

No single measure is able to capture news consumption and audience shares in a converged world. Rather, a suite of measures considered together currently offer the most appropriate solution. This basket of metrics would have at its heart a survey-based approach similar to Ofcom's Share of References, although modified to correct the drawbacks that have been highlighted in this policy brief. Despite likely measurement bias, a survey-based methodology still offers the most likely solution, because it unifies different media sources under one central methodology and allows further analysis at the demographic and national level - a key requirement in the UK. Measuring different media sources in one central survey will also help keep consistent any measurement biases.

In November 2015 Ofcom took on board some of these criticisms, ameliorating some of the concerns raised. For example, by separating out intermediaries from other traditional news publishers, it has recognised that the former are only a channel for consuming the latter, a change which should result in more meaningful results. It has also recognised that any self-reported solution is likely to produce non-trivial biases and measurement errors and therefore employed more accurate sector-specific metrics to sense-check claimed survey results. Perhaps most importantly it has recognised that in a dynamic media environment, the measurement framework must be agile, in order to account for new players and consumption patterns. It has therefore rightly pointed out that the framework will be subject to regular review to ensure it remains fit for purpose.

However, it is clear that current measurement approaches have proceeded on the basis of 'muddling through' with inadequate data sources. This is why new rules on data disclosure, to a body independent from government and with duties to respect consumer privacy and confidentiality, are required.

6. Conclusions & recommendations

Media pluralism has historically been crucial to protecting public opinion formation and the legitimacy of democracy. Online media undermine the existing regulatory and monitoring framework in multiple ways. The new framework for regulatory monitoring must both accommodate the complex media ecology of today and pre-empt what is to come in the future, to ensure it is fit for at least the next decade.

On balance, Ofcom's strategy of combining empirical data alongside qualitative factors offers a sound foundation for measuring plurality in what is likely to remain a fast-changing media ecology. There are, however, improvements to its bespoke Share of Reference metric that can be made which would better account for news consumption. Keeping an eye on new advancements in measurement (as well as possible gaps in the current framework), is paramount in this new age, since we can already see how changes in media consumption habits could be missed under the current measurement framework.

There does appear to be a gap between industry - whether news publishers or digital intermediaries - and policymakers, which needs to be addressed. The former have a wealth of data and expertise about the online news eco-system which policymakers need to tap into, to gain a better understanding of online news consumption and distribution, and the risks (both known and unknown) to media plurality. Without more long-term research that goes beyond a strict remit of measuring audience share, there is a danger that risks to media plurality are missed by advances in how media is delivered and consumed by the public.

In summary:

- Share of References currently offers the best way of measuring cross-media consumption. However, this method can be improved with a more defined set of questions and methodology, and with the incorporation of more contextual information. Additional methodological research should be undertaken to understand error margins of recall-based measurement. User diaries of media consumption are likely to help in this regard.
- The nature of editorial and media control and agenda-setting is changing rapidly, and there continues to be controversy about the lack of accountability of new digital intermediaries in the emerging media ecology. There is a rationale to empower an independent regulatory authority such as Ofcom to conduct longer term 'horizon-scanning' research alongside formal monitoring of media plurality, with a view to safeguarding media plurality in the longer term.
- Policymakers should examine the possibility that such an independent regulatory agency should be empowered to request and receive audience, browser and referral data from industry sources,

including publishers and online intermediaries, in order to inform its view both of their role in public opinion formation and the wider news ecology. Such data should be subject to guarantees of confidentiality and released only if European standards of regulatory independence are met.

- Parliament, with advice from Ofcom, should set 'bright line' audience share thresholds at which more in-depth plurality investigations would be triggered. This would improve market certainty and reduce subjectivity in the application of public interest tests.

Notes

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- ²⁷ See for example: Ofcom. 2010. *Report on public interest test on the proposed acquisition of British Sky Broadcasting Group plc by News Corporation*, p. 34
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- ²⁹ For example, regulators would need to measure consumption of Channel 5 news over TV and online while also taking into account the fact that Channel 5 is not a wholesale provider of news. The news it delivers is provided from ITN, which also provides news for other retail networks such as ITV.
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³⁹ Ofcom. 2015. *Measurement framework for media plurality. Ofcom's advice to the Secretary of State for Culture, Media and Sport.*

³⁹ Barnett, S. 2013. *Is Ofcom's "Share of References" Scheme Fit for Measuring Media Power?* [Online]. Available at: <http://blogs.lse.ac.uk/mediapolicyproject/2013/12/04/media-plurality-series-is-ofcoms-share-of-references-scheme-fit-for-measuring-media-power/> [Accessed 12 September 2014].

⁴⁰ Prior, M. 2009. *The immensely inflated news audience: Assessing bias in self-reported news exposure.* Public Opinion Quarterly. nfp002.

⁴¹ Ofcom. 2015. *Measurement framework for media plurality. Ofcom's advice to the Secretary of State for Culture, Media and Sport.*

⁴² Barnett, S. 2013. *Is Ofcom's "Share of References" Scheme Fit for Measuring Media Power?* [Online]. Available at: <http://blogs.lse.ac.uk/mediapolicyproject/2013/12/04/media-plurality-series-is-ofcoms-share-of-references-scheme-fit-for-measuring-media-power/> [Accessed 12 Sep. 2014]; Schlosberg, J. 2015. *Ofcom's Plurality Framework: Protecting the Status Quo?* [Online]. Available at: <http://blogs.lse.ac.uk/mediapolicyproject/2015/11/06/ofcoms-plurality-framework-protecting-the-status-quo/> [Accessed 31 May 2015].

⁴⁴ Asking respondents to recall what brand they consumed via social media is arguably problematic due to recall error. Ofcom should consider undertaking methodological studies to measure likely bias and error in reporting so this can be taken into consideration.

⁴⁵ Ofcom. 2015. *Measurement framework for media plurality. Ofcom's advice to the Secretary of State for Culture, Media and Sport*, p.12.

⁴⁶ Schlosberg, J. 2015. *Half empty or full: The politics of measuring media plurality* [Online]. Available at: <http://blogs.lse.ac.uk/mediapolicyproject/2015/05/20/half-empty-or-full-the-politics-of-measuring-media-plurality/> [Accessed 31 May 2015].

⁴⁷ It is important to look at audience shares over time so as not to capture temporary increases in market share due to external events, such as the publication of an exclusive story or feature, or coverage of a special event.

⁴⁸ Recommended by Professor Steven Barnett at LSE Media Plurality Measurement Workshop in September 2015.

⁴⁹ Federal Communications Commission. 2011. *Prometheus Radio Project v FCC*, 652 F 3d 431 (3d Cir 2011) [Online]. Available at: <https://www.fcc.gov/document/prometheus-radio-project-et-al-v-fcc-usa-no-08-3078-3rd-cir> [Accessed 26 November 2015].

LSE MEDIA POLICY PROJECT

ABOUT:

The Media Policy Project aims to establish a deliberative relationship between policy makers, civil society actors, media professionals and relevant media research. We want policy makers to have timely access to the best policy-relevant research and better access to the views of civil society. We also hope to engage the policy community with research on the policy making process itself. We plan to examine how policy issues emerge on the agenda and how networked communications may aid stakeholder consultation.

MEDIA POLICY PROJECT BLOG:

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