

19th January 2002, 4 pages

1. Introduction

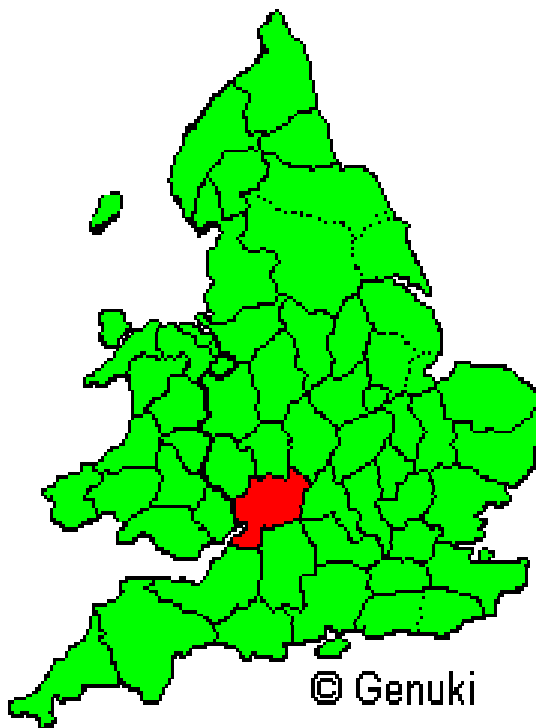
A paper 'Consultation on Media Ownership Rules' has been released for consultation, by the Department for Culture, Media and Sport in association with the Department for Trade and Industry. The paper particularly discusses the role of regulation.

This response document examines the current political nature of regulatory influences on regional anomalies (using Carlton region as example) discussing possible benefits of reduced regulation in media ownership. Also present is a side note about government regional maps and a discussion of the issues of programme clustering. This document ends with a recommendation to remove the political influences on transmitter regions and instead to emphasise the geographical nature of regional programming.

2. The Regions

In preparing this document the author wished to use a map of present UK regions. Although maps prior to the 1974 government reorganisation are easy to locate, UK maps post the 1996 reform of county boundaries do not appear to be available at either the Department of Culture Media and Sport nor The Department of Environment, Transport and the Regions. A search of the office for national statistics found a large map of UK political regions at www.statistics.gov.uk/geography/downloads/gb_cty98_a4.pdf However the map was not available in a format suitable for inclusion in this document

Instead the author is grateful to a web site on genealogy (www.genuki.org.uk) which has a map of UK regions pre 1974, and which has some similarities to the current boundary map and which is useful for illustrative purposes.



The overall region of interest to the author and used for example in this document includes Gloucestershire, Monmouthshire, Herefordshire and Worcestershire, but other regions will have similar issues.

The county of Gloucestershire is shown highlighted in red, Monmouthshire is to the west, Herefordshire to the northwest, and Worcestershire to the north. Local government reorganisation during 1974 merged Herefordshire with Worcestershire, annexed parts of Gloucestershire to Avon, and renamed Monmouthshire as Gwent with some boundary modifications. At this point Gwent was 'officially' brought into Wales, prior to this reference was to 'Wales and Monmouthshire'. Historically it appears Monmouthshire straddled a shifting border between England and Wales, which as can be seen from the map would ideally have continued southwards centrally to the unmarked coastal town of Newport via Abergavenny, a market town often referred to as the Gateway to Wales.

The 1996 Government reorganisation saw the disunion of Herefordshire and Worcestershire, and partition of east Gwent to become a new smaller Monmouthshire including Abergavenny, the rest of Gwent becoming smaller separate areas with borough and county status.

One local Monmouth newspaper 'The Monmouthshire Beacon' illustrates the geographical connections of the region by having the largest section of its readers across the political boundary in the Forest of Dean, Gloucestershire.

Similarly for local radio stations, whereas Radio Gloucestershire and Radio Hereford & Worcester are named after political regions, independent radio station Radio Wyvern is named after the geographical region of the rivers Wye and Severn passing through the area. This means for example that along the northern edge of the Cotswolds Escarpment in Gloucestershire that instead of Radio Gloucestershire, Radio Hereford & Worcester is receivable. However the geographically named station Radio Wyvern is not similarly affected.

This document will now further discuss these regional anomalies and the affects of regulation based on some TV regions.

2. Regulation and Regional Anomalies

The present analogue television system is based on a relatively few broadcast providers transmitting programmes to defined regions. The defined regions are based largely on governmental county boundaries rather than geographical boundaries determined by terrain. Unfortunately the aerials transmitting the television signals are constrained by geographical rather than governmental boundaries. These factors contrive to ensure that many citizens do not receive the regional programming desired. This is referred to as regional anomaly.



Since these regions are presently determined by Government, it is government regulation which appears to prevent broadcasters choosing to broadcast programmes more appropriate to their viewing audience region. It is hoped that output will become more transmitter centric as regulation is relaxed.

2.1. Carlton Central Region Example Anomaly

One example of regional anomaly came to light to the author, when a television news team carried a report about the local public house. Although friends told the author that they had seen the item, it was apparent that it had not been seen by anyone locally. On contacting Central News it was discovered that Carlton Central being a large region, splits its news coverage into three areas. The item had been transmitted from Central South transmitter at Ridge Hill rather than Central West transmitter at Sutton Coldfield. It transpired that coverage maps defined the author's village as being within the Central South region even though for geographical reasons (the hills) most of the village received Central West.



It was found that some control of to which region a particular place belongs was found to be with the regulator the ITC. The ITC was willing to update the region coverage maps, but in this case considered this unlikely as the maps had been in place for a number of years, had been determined by engineers taking readings in the field, and it would be costly and time consuming to investigate a change.

However Carlton were willing to send copies of their coverage maps through to the author. On examination it now appeared that these region maps had been drawn based on county boundaries. This meant that generally the border between Worcestershire and Gloucestershire along the River Avon would determine whether coverage would be Central West or Central South. In practice, many people living in north Gloucestershire on the north facing Cotswold escarpment are only able to receive Central West – nominally the wrong region.



In contrast, every evening Carlton Central transmits weather maps produced for them by Weather Services International. Over the years both companies have received correspondence from viewers and have gradually amended the maps to include these viewers. The three maps to the left from top to bottom show the overall Carlton Central region, and the sub-regions Central West and Central South. It can be seen that the weather regions not only overlap but also spread well past political boundaries particularly into mid-Wales and show the geographical population coverage of the transmitters.

It is also interesting to find the author's village correctly covered by the Central West (as well as Central South) weather map

The author wishes to acknowledge the help of both Carlton and Weather Services International in providing these internet maps.



2.2. Wales

Carlton recently acquired HTV. It was thought that the ownership of adjoining regions could help solve the issues of regional anomaly. The author discussed with a member of the ITC the position on coverage of news from adjacent regions. Initially they indicated that news items from just outside, in an adjacent region could be covered by a region so that viewers would know what was going on 'just down the road' However when the question of the English/Welsh border was raised, the view was that items from just across the border would not be coverable.

By example Hereford hospital has many of its patients from a catchment area a few miles away inside Wales, but reports about Hereford hospital or travel difficulties just over the border are unlikely to make the news in Wales.

And one broadcaster appears to show so little of England on their Wales weather map that it now shows almost the whole of Ireland.

Now that HTV is part of the Carlton group, there may be scope for inclusion of news items on a geographical rather than political basis. However this will depend on the relaxed role of regulation

2.3. Monmouthshire and East Wales

Many people in Monmouthshire and east Wales receive television from Carlton Central. This is explained by examination of the HTV news internet weather map above, which shows the relatively low lying area to the east of the Welsh hills. Unfortunately although Carlton Central weather also covers this region, the news department, apparently restricted by the coverage maps, has not been able to follow.

In recent years an item about a multiple road accident just east of Abergavenny was able to be covered by Central news because one of the victims was from within the Carlton Central West region, otherwise the regulatory coverage maps would rule this out, even though most of the area receives Carlton Central South from Ridge Hill

2.4. Carlton Central South

Carlton Central South actually has a regional anomaly within it. Two transmitters serve this region, one to the West at Ridge Hill for Herefordshire and parts of Gloucestershire (but also including Monmouthshire due to geography), and one to the east at Oxford covering Oxfordshire and also parts of other counties.

Again this means that the people of Hereford receive no news from local places such as Abergavenny, but do receive news (and advertisements) from Milton Keynes and Aylesbury some distance away. Because of this some people say the news does not feel sufficiently local.

This could be a good example of where separation of the transmitter outputs may more closely serve local needs. Ridge Hill transmitter could be used purely for its local geographic region of Monmouthshire, Herefordshire and parts of Gloucestershire. Oxford for Oxfordshire.

2.5. Satellite Television

At the time of writing satellite television also appears to have regional anomaly. The free to air channels are selected by smart card, and the regions selected by the smart card are derived from postcode and the coverage maps. So where their postcode gives people the wrong region card it seems people are either asking their friends in adjacent areas to obtain a spare card for them, or they're utilising software available from the internet which claims to make available all channels.

2.6. Digital Terrestrial Television

Digital television also suffers from regional anomaly. In the author's case the reception maps did not show the north Cotswolds receiving television from Sutton Coldfield so engineers placed a null in the field pattern of the Sutton Coldfield digital transmitter so as to allow Malvern local transmitter to use similar frequencies. Thus until Malvern frequencies are reallocated, which is not anticipated until after analogue switch off, Sutton Coldfield will not be able to transmit digital television to the north Cotswolds escarpment. If geographical rather than political reception maps had been available, then alternate frequencies may have been chosen for Malvern, mitigating the anomaly.

3. Clustering

Clustering is where a number of broadcasters provide the same type of programme at the same time.

For instance presently both BBC and ITV transmit their main television news programme at 10pm. This means that people who like watching news are only able to watch one. And people who don't like watching news, have their choice restricted. Previously one news programme was at 9pm, the other at 10pm. This gave viewers the opportunity to watch none or both.

Similar clustering occurs say with gardening programmes, or diy programmes. Recently the Sunday 8pm slot has been used to broadcast factual programmes simultaneously on BBC2, channel 4 and channel 5. Again for people interested in a particular genre of programme it is not useful to find them all transmitted at the same time. For people not interested in that genre there is the issue of having their choice restricted.

Although the rest of this document has been agreeing reduced regulation for broadcasters, this section on clustering proposes light additional regulation. Somehow a prior booking slot arrangement is required to minimise clustering. Failing that some form of self-regulation. Interestingly the BBC sometimes seems to 'cluster' BBC2 with Radio 4, again usually factual or sometimes science programming.

4. Conclusion

Larger ownership regions should allow broadcasters to consider providing transmitter centric broadcasts. This will allow the broadcasters to disregard the present coverage maps and instead use geographical maps showing where their viewers live. Currently these geographical maps seem to be available from the weather departments, who have over time updated the maps using viewer feedback.

Together with some cross media ownership this will allow broadcasters to discontinue adherence to political boundaries and instead use more useful geographic boundaries. An example in this document was perhaps for Carlton Ridge Hill to provide news coverage to all its viewers across Monmouthshire, Herefordshire and Gloucestershire. Local newspapers are already crossing the political boundaries.

Regulators should allow the broadcasters to overlap regions. Again the weather maps provide a good lead in this, allowing people to know what is going on down the road just outside their transmitter region.

Similarly broadcasters should allow viewers, using digital technology, to select alternate regions as desired rather than attempt to restrict coverage on a postcode basis

Light regulation will be required to reduce clustering of similar programmes at the same time on different broadcast networks. This document highlighted current practice with news and other programmes

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Assistance gratefully received from GENUKI, Carlton, WSI, ITC