



Consultation on Media Ownership

An IPA response to
the DCMS/DTI request for views
on the future regulation of ownership in
UK media

January 2002

Executive summary

1. At its simplest, the UK advertising industry seeks only two things from broadcast legislation:
 - the promotion of good quality programming to attract the audiences we would like to address;
 - the protection of an open and competitive market in which to buy the media required to reach these audiences.
2. In this context, we should ideally like to have retained the current ownership rules - in as far as they have preserved effective competition in the media sales marketplace for the last six years and more.
3. Having said this, we recognise the market has changed/is changing in the face of technology, a world trend to consolidation and, in particular, as a result of the decisions made by the Competition Commission with regard to the take-over of United News and Media by Granada.
4. In drafting its papers, the Government has addressed itself to what it considers the "big issues" in ownership:
 - diversity of content;
 - plurality of ownership;
 - the health of the broadcasting sector.
5. Alongside these objectives, the Government has been perceived to view the needs of advertisers and the advertising industry as important - but by no means the key determinant in ownership matters.
6. Having said this, advertising *is* a key force in the economy, in employment terms and in funding over 50% of the nation's viewing and reading.
7. Thus, while advertisers and the advertising industry may not be the key driver in broadcasting policy, *neither can we be ignored* - providing what we seek is deliverable and compatible with Government's overall public policy objectives.

8. Our proposal is therefore that we should leave the debate on the proposals on ownership to others, and instead concentrate on ensuring appropriate competition in that area where the Government must recognise the industry's needs are critically important *i.e. the actual sales process.*
9. In this context, rather than looking for guarantees of *ownership levels* within and across media, the IPA would seek to ensure the minimum number of *selling points* that should represent these owners to enable fair competition, proposing the following:
 - within any single medium, a minimum number of four sales players (*i.e. the old 25% of revenues level after which the competition authorities would begin to view company activities more closely*)
 - across media, a minimum of seven players, with a maximum revenue share each of around 15%
10. While organic growth would be permissible, if this, or a merger were to result in an owned sales point growing larger than these levels, then the media owner would be required to have an appropriate percentage of sales handled by a separately and independently run sales point to ensure proper competition is maintained.
11. The concept of independent sales houses has been shown to work in this market in the past and would enable the media owners to enjoy the benefits of consolidation, while preserving the levels of sales competition, which we believe are critical to maintaining the effectiveness of the advertising industry.
12. At the same time, Government would be able to pursue its key public policy goals without jeopardising the interests of those advertisers on whose expenditure the public's enjoyment of commercial broadcasting and publishing is principally based.

Consultation on media ownership

The IPA welcomes the opportunity to submit views to the DCMS/DTI on the above consultation.

1 About the IPA

- 1.1 The Institute of Practitioners in Advertising has been the trade association and professional institute for UK advertising agencies since 1917. It represents all those companies concerned primarily with providing strategic advice on marketing communications, creating and/or placing advertising. The IPA's 209 corporate members represent the major part of the UK's advertising agency business, handling work with an estimated value of around £7 billion in 2000 (over 80 per cent of the advertising placed by agencies). They also play a pivotal role in advising the nation's companies on how they should deploy their total marketing communications spend of £17 billion.
- 1.2 The appropriate and cost effective placement of media is as critical to the success of an advertising campaign as the development of the advertising message itself. Thus the IPA's objective since its foundation has been to secure for its members, and for British business as a whole, a favourable media environment. This is one which is both attractive for the audiences with which we wish to communicate, and sufficiently open and competitive to ensure that advertising time and space can be bought at a fair market rate. To this end, it has therefore lobbied for two principal goals:
 - 1.2.1 To maintain a high standard of programme output capable of attracting substantial audiences of wide diversity from across the entire demographic and socio-economic spectrum.
 - 1.2.2 To secure and maintain a competitive marketplace for the sale of advertising space and airtime.
- 1.3 Since media ownership will impact directly on both the above, it is of vital importance to us - and it is against these two criteria that the

observations and recommendations which follow are made.

2 **The format of our response**

2.1 In order to preserve the flow of our thoughts, this paper has been divided into two sections:

- the main document which concerns itself with the thrust of the consultation on a macro level, the needs of advertising agencies and a possible solution to their concerns arising from a consolidation in media ownership;
- an appendix which - as and where relevant to advertisers - addresses the issues on which the Government is seeking specific comment.

2.2 In this way, it is hoped we will be able usefully to restate and clarify our overall position to Government, while answering its more detailed requests.

3 **The nature of the current consultancy**

3.1 The opening chapter of the Consultation on Media Ownership Rules spells out the Government's key objectives with regard to communication regulation.

3.2 Under the overall theme of "how can governments both safeguard democracy and encourage an open and competitive market," it cites three principal goals:

3.2.1 To ensure *diversity of content*, thereby allowing the public to enjoy a wide range of different programmes, publications and services;

3.2.2 To ensure a *plurality of sources of content*, so allowing the public access to a "variety of different views, that, in a competitive market, maintain their own balance";

3.2.3 To help *maintain and improve the overall health of the market* by adopting a deregulatory approach, leading to "further consolidation, greater efficiency, more scope for investment and a more significant

international presence".

3.3 All these are goals or "bigger issues" - which the UK advertising industry agrees would be generally desirable to address. As has been pointed out on numerous occasions, the interests of the public and advertisers overlap significantly - what is good and attractive for viewers, readers and listeners is good and attractive for those who wish to communicate with them.

3.4 Having said this, the advertising industry does have its own set of specific needs, which alongside the "bigger issues" outlined above may - at first sight - appear parochial. While we do not expect these requirements to be the linchpin around which Government policy on ownership revolves, we would nevertheless underline their critical importance - not simply in terms of the business health of those manufacturing and services companies whose messages we deliver, but to the structure of the media market itself and to the ability of the public as a whole to access its news and other content on an equal basis.

4 **The needs of the UK advertising industry**

4.1 To recap on points made earlier, irrespective of the final format of any regulatory system, advertisers need three core things to promote their products successfully:

4.1.1 **Quality media which attract substantial high quality audiences**

This, in turn, will require:

- high quality, involving and enjoyable programmes;
- a wide cross-section of channels from the large main market to the niche;
- an equally wide range of programme types to call for all tastes and interests.

4.1.2 **Open access to these channels**

Advertisers need to be able to deliver their messages to the audiences attracted by the

above conditions, requiring:

- Media to be open to advertising;
- Media that are accessed (and accessible) by the overwhelming majority of the UK.

4.1.3 **An open and competitive market for space and airtime**

Audiences need to be accessible at fair and reasonable prices, requiring:

An open and competitive market.

4.2 Ownership regulation will impact critically on each of the above. It is apparent from public statements by the media owners (and underlined in all their historical submissions to the DTI/DCMS on the subject) that removal of current internal and cross media ownership constraints will signal a general move to consolidation across the media marketplace.

4.3 From the reader/viewer/listener's point of view this may not be a major concern. We are inclined to favour those arguments which suggest that rather than inhibiting choice, consolidation might provide media owners with the incentive (and the necessary financial muscle) to offer their public a wider range of entertainment options within their fields in order to maximise their audiences and their income.

Having said this, we note the adverse impact that an almost totally de-regulated market has had on the quality and diversity of programming in New Zealand. Thus we respect the Government's desire to retain some element of content regulation, though we should want to see this exercised on a macro level only, mindful that while the BBC retains the quality of its output, this will - of itself - set a benchmark for commercial programming standards.

4.4 From the media owners' point of view there may also be benefits from consolidation - most immediately in cost terms but potentially from increased international presence (though here we would highlight that the level of disparity

between consolidated UK media and operations like AOL/Time Warner and Bertelsmann would continue to see British companies as minnows in the world market).

4.5 However, from the advertiser's viewpoint, there are immediate causes for alarm in any major consolidation trend - with over-concentration leading to inevitable fears of sales dominance and exploitation.

4.6 Historically, the advertising industry's problem has been how to reconcile these legitimate concerns with:

- an overall trend toward media ownership consolidation not only in the UK but across the world;
- the impact of new technology which through convergence will - in the longer term at least - render media-specific ownership regulation meaningless;
- the "bigger issues" aimed at protecting the bases of democracy, with which the Government is rightly concerned.

5 Why advertisers needs are still important

5.1 While all contributors to the ownership debate will stress the importance of their sector and why their views should be heard, there is a real case for treating the needs of the advertising industry as fundamental to the entire UK media landscape - and vital to the economy as a whole.

5.2 The basis for this argument is three-fold:

5.2.1 The role of advertising on a macro basis, in helping to fuel the success of manufacturers, distributors, retailers and service industries.

5.2.2 Its role in financing the activities of the majority of commercially based media, which - without advertising revenues - would be forced into subscription/paid for funding.

5.2.3 Its role in maintaining free-to-air broadcasting and accessible cover prices - and thereby ensuring that society does not break down into those who can afford to be information and entertainment rich and those who cannot.

5.3 Although, surprisingly, advertising may still be viewed as an unnecessary extravagance in some circles, the reality is that responsible commercial communication forms a key factor in the success of the "Great Britain plc". It informs, educates and entertains; it promotes healthy competition and as the IPA's own Effectiveness Awards have underlined over the last 22 years, it provides a vital element to the business mix which can determine the growth and prosperity of whole corporations. To this extent, advertising is a vital component in ensuring the health of UK business and through this, employment and the health of the economy as a whole.

5.4 Although, directly, UK advertising agencies may employ only 14,000 people - according to the DCMS' own figures, this figure will rise to approximately 93,000 when supplier and media companies are included - and when applied to the economy as a whole, could justifiably be said to play a role in the employment of the nation's entire work force of 27 million.

5.5 Advertising is, for example, the key stimulus in the activities of the 5,000 call centres currently operating in the UK. According to the Health and Safety Executive, these centres now employ more than 400,000 people or about 2% of the working population - more than the coal, steel and car manufacturing industries put together. This is an enormously important - and growing - sector, with industry estimates indicating that employment in call centres will rise to 665,000 by 2008. Having said this, this sector is highly dependent on favourable conditions for marketing companies. In a digital age, companies can easily contract for their call operations elsewhere in the world.

5.6 However, advertising is not only responsible for employment, its revenues are also critical in funding a significant proportion of the nation's sources of entertainment and news. Advertising

revenues presently directly fund the majority of non-BBC broadcasting and are key in the maintenance of current cover prices in the press. Without advertising revenues, commercial free-to-air broadcasting in the UK would simply cease to exist.

- 5.7 Finally, advertising helps ensure diversity. It is still too early to assess the extent and speed with which subscription and pay-per-view services within television will finally develop. Having said this, they have both grown significantly and have the potential to threaten other parts of the market. This threat will manifest itself in the potential loss of major programming and events to subscription or pay-per-view channels - creating a significant gap between viewing opportunities for those who can afford subscriptions and those who cannot.

The BBC alone cannot be responsible for preventing a slide into a country of the information rich and poor.

As matters stand, the financial success of ITV and Channels 4 and 5 depends on a delicate balance of investment in quality programming capable of attracting significant audiences - and airtime costs which are deemed fair for accessing these viewers.

Should the landscape of this market alter adversely as a result of owner consolidation, advertisers could face a situation in which they would be forced to seek potentially less effective alternative solutions to their advertising needs. In television terms, this could result in an increased reliance on "paid for" channels in advertising - or more likely sponsorship, reducing revenues for "free-to-air" services and so creating a downward spiral in which lower revenues lead to lower programme investment, resulting in lower audiences, leading in turn to lower advertising investment etc etc.

- 5.8 It is against this backcloth that Government must examine the needs of advertisers in a consolidating marketplace.

6 Our attitudes to media ownership

- 6.1 As indicated above, the advertising industry firmly believes that there should be healthy and constructive competition both across media and within each medium.
- 6.2 In an ideal world, we should have preferred to have kept the current ownership rules intact - in that they have been effective in maintaining competition levels in the marketplace for the last six years.
- 6.3 Having said this, we are realists and recognise that in the light of:
- the increasing likelihood of media convergence through digital technology;
 - the world trend toward media consolidation;
 - the repercussions of the Competition Commission's ruling to permit the Granada take-over of United News and Media;
 - the Government's perceived acceptance of the media owners' efficiency and international competitiveness arguments;

the maintenance of this position is probably no longer possible.

- 6.4 Along with the Incorporated Society of British Advertisers (ISBA), the IPA would like to see in their place, regulation to ensure a minimum of four owners within any single medium and seven owners across all media as the most appropriate numbers to ensure adequate levels of competition. However, the basis of calculating the maximum size of individual players in these situations is more difficult.
- 6.5 Within individual media, this could be achieved fairly simply via a "share of voice" calculation based on viewership (TV), listenership (radio), circulation (press), or - in the case of outdoor - the number of panels held by a single owner. (We would assume that the BBC would be excluded from any of the calculations in the commercial markets

in which ownership rules would be applied.)

- 6.6 The situation with regard to cross-media ownership, however, is far more complex. We are not convinced by proposals that would aim to create a common currency across media by estimating the relative impact value of each individual medium. Different media work in different ways at different times and in different combinations - and to attempt to assess the relative power of - say - TV vs the press would be as impossible as it would be meaningless.
- 6.7 Faced with this, it is possible that the calculation of ownership could be based on advertising revenues to provide an alternative route and a common currency. However given the major issues of diversity and plurality which the Government is concerned to protect, we are unsure whether this basis is realistic.
- 6.8 Our experience to date has shown that while the Government has viewed the needs of the advertising industry and of British advertisers as important, they have not been seen as critical - and certainly not the key determinant - in ownership matters.
- 6.9 Rather than seeking to have the advertising tail wagging the public policy dog, we should therefore leave final recommendations on media ownership to others - and instead concentrate on seeking a guarantee of appropriate competition for the advertising industry in that area in which the Government must recognise advertisers' needs are critically important - i.e. the actual sales process - and *more especially the number of sales points required within and across the media.*

7 **Proposals on ownership of advertising sales**

- 7.1 Regardless of the final approach taken towards overall media ownership, we believe that regulating safeguards must be introduced to address the danger of concentrations in media advertising sales, with their inherent risks of price fixing and/or restricted access.
- 7.2 We believe this can be achieved by setting thresholds for referral to the regulator based on

share of media advertising revenue.

- 7.3 Based on accepted market practice the thresholds defining the scope of the regulators' discretion within each medium should be 25% of sectoral advertising and for cross-media sales control, 15% of total UK media advertising revenue.
- 7.4 Where overall media ownership exceeds 25% of sales revenues within a specific medium (or 15% across media), the media owner should be required to operate that percentage of his sales above the 25/15% limits through an independent sales company.
- 7.5 In this context, ownership of sales should be defined as ownership of the sale of advertising and the advertising revenues this represents. Advertising revenue should be defined as those monies secured from all forms of paid-for advertising to include sponsorship, advertorials and inserts, as well as traditional airtime and space.
- 7.6 In those cases where the current sectoral shares exceed 25% (eg TV, press and cinema - see Appendix II) IPA acceptance of these positions would be conditional upon:
- media owners' undertakings not to exploit their dominant positions;
 - no further increase in these shares except through organic growth, achieved as a result of successful sales of media stock;
 - a block on growth through mergers, acquisitions or the appointment of new contracts.
- 7.7 On a cross-media basis, analysis reveals that the proposed 15% ceiling on ownership of sales is not currently exceeded.
- 7.8 In addition, we should seek the introduction of specific rules governing the ownership of sales in key/sensitive regions in the country.
- 7.9 These should be determined by medium to take account of fair and proper competition by region,

with the following applying as a minimum:

- A minimum of two London ITV sales companies until such a time as ITV falls to or below 25% of total television advertising revenue;
- A minimum of three commercial radio sales companies by area in the UK;
- A minimum of two regional newspapers in key regions/cities of the UK, except for those where one or none currently exist;
- A minimum of two poster contractors/sales companies in key regions/cities in the UK, except for those where one or none currently exist.

8 **The structure of the proposed independent sales companies**

8.1 While the IPA recognises that there are problems associated with the separation of sales from the ownership of media, we do not believe these are insurmountable. Indeed, separate and independent sales houses have operated across a number of UK media in the past, and there are current examples of similar arrangements.

In this context, it is possible to cite the Scottish Media Group's (SMG) relationship with Carlton TV, which handles SMG's airtime sales, while the Discovery Channel's sales are now handled by Sky and were previously the responsibility of Carlton. (Although these parallels may not be exact, they serve to show that such arrangements are possible and the IPA would be happy to give a fuller explanation, with more detailed examples of separate media sales operations and how these might work, if required.)

8.2 In the event that it should become necessary to separate some of the advertising sales from the media owner, the following rules should apply.

8.2.1 The rules and enforcement of the rules should be the responsibility of the overall regulatory body (Ofcom) or its appointed committee.

- 8.2.2 Ownership of the independent sales operation should be a minimum of 81% entirely separate from the media owners.
- 8.2.3 The media owners should have no board representation within the sales company.
- 8.2.4 The media owners should be given no 'market sensitive' information (either written or verbal by the sales company) which relates to the media market unless the media owner does not operate sales in that or any other media market.
- 8.2.5 Any sales incentives that might be operated by the media owner for the sales company must relate entirely to the performance of the sales company in competition with all other sales organisations within the media market including the other sales organisation either owned or appointed by that media owner.
- 8.2.6 It would be essential that the media owner and its appointed independent sales company are accountable for adhering to the above rules. As already stated, the regulatory body should have responsibility for this and also be responsible for policing and enforcing the rules and imposing penalties if they were not properly applied.

9 **Conclusions and recommendations**

- 9.1 The IPA recognises the importance of media ownership and cross-media ownership issues in the Government's proposals for the future of broadcasting.
- 9.2 Faced with the requirement to ensure diversity and plurality for the public we do not believe that it is realistic to expect Government policy on these issues to be determined solely by individual sectoral interests.
- 9.3 Having said this, we believe that it is the duty of Government to protect and enhance the interests of key market players where these can be achieved without jeopardising its overall goals.

- 9.4 As has been demonstrated in this paper, and on numerous occasions before, the advertising industry plays a critical role not only in ensuring the availability to the public of commercial free-to-air broadcasting and accessible cover prices, but in stimulating and maintaining the health of the economy as a whole.
- 9.5 To this extent, the needs of advertisers cannot be ignored without seriously endangering the current media landscape and the business health of the country.
- 9.6 In general, the requirements of advertisers for good and attractive media content are simple and coincide with those of the public.
- 9.7 Where the industry's needs are more specific, however, we believe they can be accommodated via specific regulation within the Broadcasting Bill relating to the way in which advertising, in its broadest sense, is sold.
- 9.8 The implementation of the proposed 25% sector specific and 15% cross-media ceilings on media sales by single sales companies is simple, transparent and easily policed. Moreover, its concept of independent sales operations has been shown to work in this market in the past.
- 9.9 Through such an approach, we believe it will be possible to ensure the free and open competition for media sales which we believe critical to maintaining the health of our industry.
- 9.10 At the same time, we believe it will allow the freeing-up of overall media ownership to allow more general economies and an improved ability to compete on the international stage.
- 9.11 In this way, it is hoped that the needs of the public, the media owners and the advertising industry can all be successfully accommodated.

Appendix I

Detailed comments
on the questions raised
in the consultation paper

1. **General prohibitions (page 17)**

The IPA notes the Government's proposals to revoke the rules preventing local authorities and advertising agencies from owning media companies, but to maintain the prohibition on ownership by political organisation.

As citizens, we appreciate the dangers of removing the last prohibition; with regard to the ownership of media by local authorities, this would only be of concern to us should such ownership lead to anti-competitive behaviour, which seems unlikely.

By contrast, the ownership of media by advertising agencies is strictly forbidden to IPA members as part of the Institute's Memorandum and Articles.

This requirement is designed to ensure that our members plan and implement campaigns for their clients independently and purely in their customers' best interest.

Regardless of statutory abolition, this prohibition would continue to form a cornerstone of IPA membership.

2. **Foreign ownership (page 17)**

While we can understand why for macro economic reasons, the Government may wish to keep the current prohibitions on non-EAA ownership of broadcasters, from an advertising standpoint the nationality of ownership is immaterial, in as far as our interests are served by good and attractive programming and fair pricing regardless of the location of a broadcaster's head office.

3. **Religious ownership (pages 18/19)**

Again, from an advertising standpoint, we have no views on the above - other than, perhaps, that any resulting licences should be capable of attracting advertising revenues rather than relying on subscriptions or pledges for their operation (ie that they should widen the opportunities for advertisers rather than inhibit them).

4. **TV - single ownership of London ITV licences (page 19)**

Historically, the IPA has opposed single ownership of the two London ITV licences. Despite the recent erosion of ITV's overall revenue share, the capital still accounts for c28% of ITV expenditure, which would give any single broadcaster enormous and unacceptable power with regard to the purchase of airtime sales,

unless specific action were taken to ensure competitiveness at the sales level (see Section 7 of our main paper for the IPA's proposals in this area).

In addition, it is our belief that, without such safeguards, this share would undoubtedly rise still further, adding to an imbalance which would impact on competing broadcasters' ability to invest in programming and so exacerbate an already dangerous situation.

5. **The 15% limit on share of TV audience (page 19)**

As above, we have historically championed the 15% limit on share of TV audience and would only countenance its removal, if other safeguards were in place in addition to competition law.

6. **News provision (page 21)**

We have no particular view on the ownership of news provision other than that any consolidation should, indeed, lead to more dynamic investment rather than a loss of independence and an increased vulnerability to short-term management. Reducing the number of share holders from five to three would seem to achieve this.

7. **Radio (pages 23, 24 and 25)**

The IPA has already gone on record in support of the Radio Authority/ CRCA's proposals to abolish the current archaic points system for radio ownership while upholding the Government's policy objectives of local plurality and diversity.

Just as in other media, we are concerned that the simple application of competition law to radio ownership could lead to the emergence of worrying local monopolies both within radio and across media.

For this reason, we support the view that OFCOM should be responsible both for ensuring that in every local area, there are at least three owners of ILR services/sales points in addition to the BBC and for instituting a scheme that similarly ensures at least three owners of local digital sound programme service licences in each area and plurality of ownership of multiple licences. Moreover we would go further in this area to endorse the Radio Authority's detailed proposals to restrict cross-media ownership between radio and newspapers and radio and commercial television (see the Radio Authority's submission to the proposed White Paper on Communication Reform, June

2000).

With regard to the prevention of the onward sale of licences for a two year period after their award, however, we should urge caution. If the character of a service resulting from an earlier "beauty-parade" method of allocating licences has led to its demonstrable market failure, we see little point in perpetuating this situation. Instead, we believe it should be sold on at the earliest opportunity, allowing the consumer to judge whether any change of character is in his or her best interests.

8. **The Press (page 27)**

To date, we believe the press has been subject to a degree of ownership regulation which has been based more on the perception of its power to influence public opinion than its actuality in a multi-media society.

Press owners, uninhibited by the statutory requirements of the broadcast media to present "balanced" views, have sought to stress their importance and, in so doing, have attracted a level of intervention which is significantly greater than other media.

To this extent, we are in favour of liberalising the current regime.

Having said this, the IPA is as concerned to retain a real level of sales competition in this market as in the broadcast media.

This is particularly the case in local/regional press, where traditional monopolies in "paid for" titles appear to be growing across regions and into freesheets.

Combining this with potential ownership of other local media like radio and posters, could lead to real concerns that entire regions might become the "property" of single companies - hardening rates to the detriment of local, regional and national advertisers alike.

9. **Cross-media ownership (page 30)**

(See the main document for our thoughts in this area.)

10. **Review of ownership rules (page 31)**

While the IPA would wholeheartedly agree with the concept of a regular review of media ownership rules by

OFCOM, we should question a frequency period of two years. Although it is clearly desirable to be able to respond quickly to changing circumstances, the danger of a review every 24 months would be a period of almost continuous lobbying from all parties which would be both expensive and time consuming for all involved. For this reason, we should suggest such a review take place at a minimum of a three to four yearly interval.

Advertising revenue shares

By Owner

1. TV

	2001 %
GMS	31.0
Carlton	26.1
Channel 4	20.3
Sky	8.7
Channel 5	6.4
Flextech	4.2
GMTV	1.9
Others	1.1
S4C	0.3

Source MV Jan-Dec 2001 Estimates

Advertising revenue shares

By Owner

2. Newspapers and magazines

a. Newspapers

	2001 %
Associated	25.8
News International	20.1
Telegraph	14.1
Trinity Mirror	12.1
Northern & Shell	10.4
Financial Times	9.5
Guardian Media	4.4
Independent News	3.7

b. Magazines

	2001 %
IPC	18.0
EMAP	13.1
National Magazines	8.9
Conde Nast	6.2
BBC Worldwide	4.2
H Bauer	3.3
Dennis Publishing	2.2
Future Publishing	2.0
Redwood	1.6
Hello	1.3
DC Thompson	1.0
Readers Digest	0.8
Attic Futura	0.8
John Brown	0.3
Cabal	0.3
I Feel Good	0.2
Others measured by MMS	35.8

*based on MMS and estimated figures

Source: MMS Medialog

Advertising Revenue Shares

By Owner

3. Radio

	2001 %
Opus	28.1
Capital	22.0
Emap	18.0
Chrysalis	8.9
SIRS	8.0
Impact	4.9
Virgin	4.9
CCRS	4.0
Atlantic	0.9
Fusion	0.3

Source: MMS/MV Jan-Dec 2001 Estimates

4. Cinema

	2001 %
Carlton Screen Advertising	72.1
Pearl & Dean	27.9

Source: MV Jan-Dec 2001 Estimates

Advertising Revenue Shares

By Owner

5. Outdoor

	2001 %
Clear Channel	22.0
Viacom	17.0
Decaux	15.0
Maiden	14.0
Score	4.0
Others	28.0

Source: Poster Publicity Estimates 2001

For further comment and information, please contact:

Jim Marshall Chairman, IPA Media Policy Group Jim.Marshall@mediavest.

Hamish Pringle Director General hamish@ipa.co.uk

Geoff Russell Director for Media Affairs geoff@ipa.co.uk



Institute of Practitioners in Advertising
44 Belgrave Square, London SW1X 8QS
telephone: 020-7235 7020 *fax:* 020-7245 9904