# FEASIBILITY OF USING AUDIENCE MEASURES TO ASSESS PLURALISM

**Position Paper** 

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## **1. INTRODUCTION**

This Position Paper completes a review of audience measures for television, press and radio within the EU and offers a definitive statement on the application of audience measures as indices of pluralism. It continues from an earlier study of audience measures within the EU, for which an internal report was submitted to DGXV in September 1993.

The present line of enquiry has been instigated by the Green Paper on "Pluralism and Media Concentration in the Internal Market". This opened the discussion by proposing to take audiences as the main criterion for setting restriction thresholds on media ownership. Such a step appeared suitable because it possessed two advantages. "First, it takes the consumer as the point of reference and would therefore be of maximum effectiveness in relation to one of the objectives sought, namely that of serving the interests of the media consumer. Second, it does not use abstract criteria which, because they apply automatically and disregard the market, could penalize economic operators."

But, could the "audience" approach be made to work in practice?

To answer this question, DGXV commissioned an internal report, whose main objectives were to:

- Describe audience measurement practice for television, press and radio across EU member states;
- Review international and national audience surveys with regard to (a) their comprehensivity, (b) their evenness of treatment of media, and (c) within each medium, the comparability of measures across different surveys;
- Assess provisionally the feasibility of employing audience measures in order to construct audience maps of pluralism.

The internal report concluded that it was feasible to attempt to use audience measures in this way, and recommended the following measures by medium:

Television - Audience share Press (national and regional newspapers) - Circulation share Radio - Listenership share

The objectives of the Position Paper are to:

- Supply precise definitions of the measures being looked at;
- Specify the terms under which the measures are to be applied.

The lay-out is in four parts.

Section 2.1. establishes the terms of reference. Namely, the conclusions are qualified in so far as feasibility is judged purely with reference to the audience measures. Other factors will also affect the feasibility of the audience approach. It is, for example, a necessary condition that media controllers can be identified precisely. This is a distinct and separate issue from the application of audience measures, and therefore not part of this paper. Section 2.1. mentions the main extraneous factors that will affect the successful use of audience measures to assess pluralism, and states the point of view taken on them by the Position Paper.

Section 2.2. recapitulates the main points of discussion contained in the internal report, with a view to arguing the terms under which audience measures can be used. The point that needs to be established is the precision with which audience measures can be used. Whereas a shareholding of 40% can be calculated exactly, an audience measure of 40%, by contrast, is always estimated from a population sample, with an associated sampling error. In addition, no two surveys monitoring the same audiences are likely to produce the same results, nor are they likely to produce exactly the same measures. Such factors have to be taken into account in framing rules governing pluralism.

How much the margins of error or the lack of comparability between different surveys matter depends very much on the content of the rules which seek to employ audience threshold criteria The object of this exercise, however, is not to comment on the rules themselves, but simply to indicate in broad terms what the audience measures can do, and the limits of their application.

Section 2.3. specifies the precise measures being used for the construction of audience maps in television, press and radio. Press circulation measures are covered in greater depth than the measures for television or radio, as the internal report concentrated on readership measures.

Section 2.4. discusses the application of audience measures for multimedia analyses of pluralism. This was not covered by the internal report; however, both the Green Paper and several responses to it assert the necessity for having composite measures.

Finally, Section 3 summarizes the main conclusions of sections 2.1. - 2.4. and provides a definitive view on the application of audience measures.

## 2. APPLYING AUDIENCE MEASURES TO MEASURE PLURALISM

## **2.1. Terms Of Reference**

Conclusions about the feasibility of audience measures are presented here purely in terms of the measures; however it is important to mention other factors affecting feasibility, and the position taken with regard to each. Three, in particular, stand out.

#### 2.1.1. Defining Pluralism

The Green Paper observes that, "outside the legal context, pluralism is used in a broad, general sense." Furthermore, there is no common understanding of the concept, taking into account the variety of national expressions employing the word, pluralism. The Green Paper is nonetheless able to establish the existence of a common legal concept of pluralism and ends its discussion with the statement that, "In this report, the term "pluralism" will be used to mean the objective, that is "diversity of information" in the broad sense."

This study has espoused the definition contained in the Green Paper, but it only begs the question, what is the right audience measure of diversity? This has two aspects: how on the one hand to define the media source, and how on the other hand to decide what is the right measure in theory or in practice.

The Green Paper has answered the first question by partitioning the spectrum of choice by media controller (see 2.1.2. below). As to the second question, the internal report observed that no one audience measure will be the single right one to choose. Rather, it proposed one measure for each medium that (a) appeared most appropriate in light of the discussion in the Green Paper, and (b) could be applied throughout the EU. This does not mean that other measures would not yield fruitful results; or that more than one audience measure by medium does not represent the best long-term solution. As both the Green Paper and some responses have expressed their views, pluralism needs to be assessed in relation to multiple criteria.

#### 2.1.2. Definition of Media Controller

Page 20 of the Green Paper states that "the question of control is essential, for it is necessary to know who controls what". The Green Paper does not attempt an operational definition of media controller that would serve to pinpoint the controller of each and every channel or title, although it notes that the concept of majority shareholder is insufficient, because there is sometimes more than one majority shareholder.

For the purposes of this study, the precise definition of media controller is a is not an issue.

#### 2.2.3. Defining Reference Zones

A critical issue for assessing pluralism is definition of the reference zone(s), whose two main dimensions may be termed:

- 1. Geographic scope (EU, supra-national language zone, member states, regions, departments, communes, etc.);
- 2. Media content (news, politics, sport, gardening, etc.).

These and other (e.g. linguistic) dimensions need to be identified and addressed, since the concept of pluralism as "diversity of information (sources)" implies considerations of share, and therefore of reference zones. Ideally, the point of reference is each and every person to whom the media are addressed; "but, as this is impossible, it is necessary to focus on the notion of consumption area and determine the choice of media offered in such areas (which may not be precisely delineated or homogeneous)" (cf. Green Paper, page 21).

The thrust of any EU initiative will, if it comes about, be at the national level (with a view to harmonization, reducing/eliminating disparities, etc.), and/or at the supra-national level (creation of the single internal market). Accordingly, the Position Paper concentrates on the national and supra-national perspective.

Although, the evolution of the single market may foster the growth of international media as well as multinational ownership of national media, the former currently represent a very small collective audience share (well under 1% of total media consumption), whilst the latter are still quite restricted in scope, except in consumer magazines, which lie outside national laws regulating media concentrations. Most media markets are strongly national in orientation, and language zones are important in restricting the size of overspill audiences. Accordingly, the Position Paper concentrates on analysis of pluralism at the levels of (a) EU member states and (b) language zones.

As for media content, the aim of the Position Paper is to explore the general principle of applying audience measures to assess pluralism. It is sufficient to examine the issues from the perspective of the whole rather than specific segments (e.g. news, sports, etc.).

### 2.2. Review Of Audience Measures In The EU - Main Conclusions

How far audience measures can be used to assess pluralism within national or supra-national markets, depends on the quality and comprehensivity of the surveys in use. In an ideal world, surveys would measure every single television and radio channel, and every single newspaper title uniformly and with equal precision and accuracy. across the EU. But, nothing is perfect, and the practical question is whether they are good enough to be used at all. The following list sets down the main criteria for taking into consideration, with a brief assessment of how well EU surveys perform.

#### 2.2.1. Existence of Surveys

A necessary condition for using audience measures is the existence of regular surveys. This is hardly a problem as all EU member states, with the exception of Luxembourg, possess their own national surveys for television, press and radio. In the case of Luxembourg, the only gap is television audience data, since the Belgian multimedia CIM survey, which collects audience data for press and radio, also covers Luxembourg. Occasional discontinuities have occurred in the Southern European countries, such as the absence of a national radio listenership survey in Italy during 1992 and 1993. However, they are exceptional.

International media are usually surveyed once every two or three years, but in general, the vast majority of channels and titles with significant audience are surveyed every year, and the results are published annually or over shorter intervals. The frequency of reporting and delays in making the audience data available vary substantially by medium, and this may be a consideration in framing rules on pluralism. In principle, though, the data exist for constructing audience maps.

#### **2.2.2. Continuity of Collecting Survey Data**

Continuity of data collection is potentially important, as it risks biased measures owing to seasonal and other factors.

If the problem exists, it is very minor. Within each calendar year, all current television surveys collect audience data on all days of the year, eight out of twelve press surveys reviewed in the internal report collect data across at least ten months of the year, the remainder across 170 days or more, and likewise, nine out of the thirteen listed radio surveys are continuous through ten months or more of the year.

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#### 2.2.3. Comprehensivity of Media Coverage

It is essential that audience surveys are comprehensive in their coverage of the media. With regard to each medium:

 National television surveys measure viewing to all channels, although there exist restrictions over reporting. These are most significant in smaller countries like Ireland and Belgium, which share the same languages as their bigger neighbours. As a result, supra-national analyses of language zones and national analyses within those zones are limited to some extent.

A further specific limitation of television audience measurement is the restriction of all national surveys to measuring viewing in the home, albeit some measure guest viewing and treat it as a substitute for outof-home television viewing in other TV homes.

 The main drawback of press readership surveys is their limited coverage of titles. In the case of newspapers, readership surveys invariably cover all the national distributed titles, but there are some big gaps in the coverage of regional titles - at one extreme the French 1992 CESP readership survey did not research any regional titles (N.B. the PQRN survey, which has superseded the earlier CESP survey, does measure readership for regional titles). By contrast, circulation data are quoted for almost every newspaper, and virtually all are audited (see Section 3). This was one reason for preferring circulation figures to readership figures in studying pluralism.

All readership surveys measure reading, wherever it occurs.

• The one instance where a radio survey appeared to give well below full coverage of stations was the Dutch Intomart survey, which excluded the non-commercial local stations. Likewise, the Portuguese Bareme survey, though not their IAR survey, also omits a substantial number of regional/local stations. It is not certain how significant these discrepancies are. They are probably minor.

As with press readership, radio surveys measure listening, wherever it occurs.

#### 2.2.4. National Coverage - Universe Definitions

Ideally, national surveys should measure media consumption across national universes. All the surveys listed in the internal report do so, but for the Greek AGB Hellas (television), which covers urban areas only, the

Portuguese Bareme (press and radio), which covers mainland Portugal, and the Portuguese IAR (radio), which covers Lisbon and Oporto only. Geographical restrictions, as between urban versus rural areas, could have a significant affect on measures of total audience, where significant variations exist in media availability that coincide with the geographic restrictions. The problem really only arises for some media in Greece and Portugal.

#### **2.2.5. Evenness of Treatment**

The use of audience measures would be undermined if surveys applied methodologies containing distortions, whereby some channels or titles returned over- or under-estimates of audience size relative to others. The internal report identified where the distortions might occur, and discussed the extent to which they were deliberate (i.e. introduced by the main controllers of the surveys) or inevitable (i.e. an inevitable consequence of the methodologies being employed). In general, the report argued that distortions of the measures (a) were most likely to occur as an inevitable consequence of the methodologies employed, but (b) were fairly insignificant overall. Mostly, they appeared to affect minor, or specialist channels and titles most, for which the audience measures were inherently less stable.

#### 2.2.6. Comparability of Measures

This is the issue of harmonization. It is important for supra-national framework legislation that audience measures are comparable across borders.

The internal report concludes that comparability, or rather, the lack of it, is not a significant obstacle for the construction of audience maps.

First, national surveys within each media category all employ the same fundamental concepts of media consumption, even where the methodologies vary (as with Recent Reading and First Read Yesterday measures of reading). Although televisions surveys are divided between those which treat viewing as presence in room with TV set switched on and those which require individuals to be present and watching, the end differences are almost certainly negligible. Meanwhile, practically all readership surveys ask their interviewees whether they have "read or looked at" at such-and-such a publication, or words very similar, and radio surveys simply measure listening.

Second, whilst there exist clear grounds for supposing that different surveys yield different absolute estimates of audience size, this may not

be important for the measures under consideration for monitoring pluralism. To take each medium in turn:

• The main measure proposed for television is audience share. It is a relative measure, which will be completely unaffected by lack of comparability over estimates of absolute audience size as long as the differences are evenly distributed across channels. There will, of course be some distortions. For example, supposing a young person's music station, such as MTV Europe, were particularly likely to be viewed in friends' homes, a survey which excluded guest viewing would penalize it both in terms of absolute audience size relative to other channels, and in terms of audience share. However, share would be less affected, and examples of this kind are likely to be very few, and insignificant within the overall context of viewing.

Another important television audience measure is daily average reach (see Section 2.4. on multimedia analyses). Like share, it too is hardly affected by the lack of comparability over different estimates of absolute audience size, nor is it likely that different survey definitions of daily channel reach, will matter (see Section 2.3.).

- Press readership measures show lack of comparability both across countries, and within countries, where the German experience has shown that different research institutes employing identical methodologies will yield consistently different patterns of results over time. Again, it matters less if a "share of readership" measure is used. Meanwhile, the main recommended measure of pluralism in press is share of circulation. The comparability of press circulation measures is not covered by the internal report, but is discussed in Section 2.3., which follows.
- Similar remarks apply to radio as television. Surveys may differ appreciably over their estimates of absolute audience size, however, share and reach measures are unlikely to be significantly affected.

#### 2.2.7. Compatibility of Measures

Lack of compatibility is a further impediment to cross-border or crossmedia comparisons, but chiefly the problem occurs at finer levels of analysis, where specific target groups are being examined. The present requirements are for broad averages, in which respect the main barrier of compatibility concerns the variations over universe definition, where surveys vary slightly over their selection of age and housing criteria for defining universe size. But these variations are (a) small (in the order of a percentage point or two), and (b) will have an even smaller affect on the chosen audience measures.

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#### 2.2.8. Equivalence of Measures Within Media

The Green Paper, and several responses to it, have emphasized the need for equivalent measures across all media in order to measure the **full** extent of pluralism. The measures recommended by the internal report are not equivalent; rather they have been proposed as the best candidates for analyzing pluralism within each medium - television, newspapers and radio. For purposes of synthesizing share figures across media, Section 2.4. introduces the concept of "share of daily contacts", the basis of which are reach figures for television and radio, and readership figures for press. It is argued that they represent equivalent measures, and their application for assessing media pluralism is justified.

#### 2.2.9. Conclusion

In conclusion, there exist a number of differences between different national surveys, which will impair the precision of audience measures of pluralism. However, the surveys probably measure the great majority (i.e. 90%+) of daily media consumption of television, newspapers and radio. And, whilst they may vary appreciably over their estimates of absolute audience size (also impossible to assess exactly), the measures selected for studying pluralism will not be greatly affected. This is not to say that all differences are trivial. For example, the restriction of the Greek TV universe to urban homes, where the penetration of private channels is greatest, needs to be taken into account when assessing pluralism in Greece. However, instances like this must count as exceptions within the overall context of audience measurement in the In our view, the application of audience measures is broadly EU. feasible.

### **2.3. Definitions Of Audience Measures**

The objective is to confirm the use of standard definitions, indicating where differences might arise.

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This has been done by sending short questionnaires to the research companies, audit bureaux, joint industry bodies, or other expert parties involved with supplying the data to users. After their completion and return, the tabulated answers have been sent back for checking. The main information is summarized in Tables 1-12 at the end of this section.

#### 2.3.1. Television

The key measure for monomedia analyses is audience share; but also the multimedia analyses require a measure of daily reach. In addition, the questionnaire collected information about definitions of total daily average viewing, daily average viewing by channel, and channel penetration.

In summarizing the information, Tables 1-4 have treated North and South Belgium as separate national universes, and regional universes are regions within North and South Belgium respectively. Likewise, the Greek universe, which covers urban areas only, is also treated as a national universe.

All systems offer comparable broad measures of television audiences. The broad measures are readily obtainable for those channels which are reported.

*Channel Share* (Table 1): The standard definition of channel share is its "share of total TV viewing over a defined time period for a population." All countries use this definition, or a variant which comes to the same thing. The one minor point of divergence is the interpretation of total TV viewing, with countries about equally divided between those who include TV channels only within the total viewing figure, and others who include other uses of the TV set as well, such as for watching videocassettes, or playing video games. Extraneous use will diminish the reported audience shares of TV channels; however, the total effect will equal a few percentage points only, and it is a simple matter to re-profile channel share figures on to the base of all TV channels. The BARB practice of reporting consolidated ratings probably makes a marginal difference to the balance of channel attribution.

Mostly, channel share figures are reported against regional as well as national universes (about half the respondents report channel share

figures against additional universes). Almost all are available (inter alia) as monthly and annual figures, and against the main target audiences of adults and individuals.

Channel Reach (Table 2): The standard definition of daily reach is "the cumulative percentage of a population who have viewed a channel at least once over a defined time period". All systems are able to report both daily and weekly estimates of reach. The main variation concerns their choice of thresholds. The majority base their daily and weekly reach estimates on any viewing (usually defined operationally as "one or more assigned minutes"), though some, such as Gallup TVR in Denmark, employ longer thresholds (viz. at least five minutes). The more stringent thresholds could have a significant effect for minor channels with small, "dip-into-and-dip-out-of" audiences; however, it will have little effect on our measure of "share of daily contacts", and, as various contributors have pointed out, it is very easy to change thresholds for special analyses.

Total Daily Average Viewing (and Daily Average Viewing by Channel) (Table 3): The standard definition is "total daily average viewing per head, expressed in minutes for a population". All systems are able to output total daily average viewing as defined here, although one or two systems (e.g. Auditel in Italy and AGB Hellas in Greece) use more than one measure, and mean something else by "daily average viewing" (e.g. in Italy, "total daily average viewing" is the equivalent of Auditel's "average time spent viewing"). The calculations may also differ in terms of computer software routines, however, this ought to have a negligible effect on the measures.

Like channel share, the total daily average viewing measures are not fully comparable, depending on whether they include other uses of the TV set. Each system employs the same procedures for reporting channel share and total daily average viewing. Except for Ireland, where there is very limited availability of broad audience figures, the same restrictions are found for total daily average viewing and total daily average viewing by channel as for channel share.

*Channel Penetration* (Table 4): All systems provide channel penetration data, mostly on an annual basis. The sources vary - mostly, penetration figures are taken from establishment or multimedia surveys employing larger samples, which ought to give more stable estimates - and systems tend to divide between those reporting penetration against all individuals and those choosing homes/TV homes as the basis for reporting. There will be slight discrepancies from "true penetration" values, depending on the representativeness and recency of sampling, and on the thoroughness of the questioning. As discussed in the internal report, they will affect the minority channels most; however, viewing figures are

hardly affected by such discrepancies, for penetration figures are rarely used by any system as panel controls or weights.

#### 2.3.2. Press (Newspapers)

The internal report has recommended share of circulation measures for mapping pluralism in the press. The key measure for defining a media of controller's position in the market is audience share.

As far as we are aware, just about every daily and weekly paid for newspaper releases circulation data. Furthermore, national audit bureaux exist in many countries, whose main function is to check the accuracy of the released figures. Except in Greece and the Netherlands, each EU member state has its own national body. The Greek and Dutch newspapers are nonetheless audited by independent bureaux, as are international publications. For instance, the June 1993 ABC report from the United Kingdom reports audited figures for three Pan European press titles.

All national bureaux within the EU belong to the International Federation of Audit Bureaux of Circulations (IFABC). The criteria of eligibility for membership of the IFABC are that the bureaux should:

- Have tripartite constitution by advertisers, advertising agencies/buyers and publishers;
- Use internally standardized terms and definitions for reporting their circulation figures;
- Be non-profit-making;
- Publish fact and not opinion about circulation;
- Encourage active participation by all potentially interested parties.

IFABC's own literature expands on its role and on the activities of its members. The coverage of national bureaux is mostly very comprehensive, especially, it seems, with regard to newspapers. We have not checked the comprehensivity; however, the EU bureaux provide some supporting evidence in the 12th Edition of "Circulation Auditing Around the World', published in May 1992. Thus, the Belgian CIM audits 95% of newspaper titles, corresponding with 99% of circulation; 99% of the daily and weekly German press is affiliated to the IVW; and in France, every publisher with more than 30,000 average issue circulation is obliged by law to release figures, which are audited by the OJD. Not all are quite as comprehensive as this. For example, the Spanish OJD

claims to audit 86% of newspaper and magazine circulation, and the Italian ADS covers 85% of the newspaper sector, falling to 50% if when magazines are included. In such cases where total coverage of print media is not comprehensive, it appears that the over-riding cause is the magazine sector. By way of further illustration, depending on the category of newspaper, the British ABC audits between 92% and 100% of newspaper titles, compared with 72% of business publications and 54% of magazines.

After comprehensivity, an important issue is the degree of comparability. This has two aspects. On the one hand, the issue of methodology concerning such questions as: How frequently are the audits carried out? With what degree of thoroughness? With how much staff training? By what means? And so on, and so on. On the other hand there is the question of external standardization of reporting measures. Whereas it is not for this report to comment on variations over methodology, it is in its domain to identify where bureaux differ over what they include within their circulation figures.

It appears from one conversation we had with a bureau, that sizeable deviations from the true figures could occur as easily with circulation as with readership figures; however, this appears much more likely to occur with smaller publications, and with magazines or business publications rather than newspapers. In addition, the statistic we are after is share of circulation rather than straight circulation, where we would expect the variations to be subdued. In other words, we do not see lack of absolute comparability as a significant issue for newspapers.

Tables 5-10 summarize the information gathered from our press guestionnaire sent to national audit bureaux within the EU.

Basis of Circulation Estimates (Table 5): Table 5 identifies the national audit bureaux in EU member states, and show the types of circulation measures that they publish. "Gross print run" on the far left represents the most inflated criterion of circulation, whilst "Net print run" on the far right represents the most stringent criterion and is the broad measure wanted for pluralism, for which emphasis must be placed on the "contacted population". With the exception of Portugal, all bureaux publish net distribution measures. They may also publish softer measures of gross distribution or print run. It is hard to say how much on average print run estimates will exceed distribution estimates. Some examples we have met with from the French OJD show margins ranging from approximately 25% - 100% increase of net print run over net distribution.

*Components of Net Distribution Measures* (Table 6): Within net distribution, the main distinction is between paid and unpaid circulation. As far as pluralism goes, net distribution measures ought ideally to

include all sales at full and reduced price, and also free copies, so long as they represent bone fide external distribution to the general public. With the possible exceptions of Belgium, Italy and Spain, this is what most attempt to supply. In all cases the bureaux set criteria for defining paid for circulation, which will include some or all reduced price sales above a certain threshold (from greater than zero to 75% for Germany). The rest are treated as free. There is wide variation between countries, which will at least partly reflect the differing structures of each national market. Our impression is that free and reduced price subscriptions below the more stringent thresholds, which some bureaux set, are a relatively minor component of average issue circulation. Leaving aside the other, methodological issues (see above), we doubt whether the average difference between the laxest and most stringent methods of estimation is more than 10%. Possibly, it is a good deal less. Even in the "laxer" cases (e.g. Italy), it is possible to subtract components of the total average issue circulation, as most bureaux break out the audited figures into separate categories. Except for the question of unsold returns, we do not consider the lack of precise standardization to be a significant issue.

*Foreign Circulation* (Table 7): Except for Denmark, where foreign sales are held to be very small (under 1% of circulation), all countries include foreign distribution in the total circulation figures. However, they can be broken out, albeit CIM (Belgium) and OJD (Spain) set threshold criteria for doing so.

CIM (Belgium) and ABC (Ireland and United Kingdom) provide some break-out of foreign sales. In addition, ABC now (from beginning of 1994) offers customized break-outs of foreign and domestic distribution should this be asked for. The three international publications quoted in the June 1993 report - The European, The Wall Street Journal, and USA Today - have audited circulation figures for the EU as a whole. More detailed break-outs may become available in the future. Failing that, publishers' statements, which are unaudited, could be tried as a source of country-by-country break-outs.

But for the Belgian, Irish and British qualifications, it is impossible to tell from the foreign sales figures where the newspapers were distributed, or even how much distribution was inside the EU. Nor, to our knowledge, is there any case of a national bureau auditing the sales within its borders of a foreign newspaper. The raison d'être of the national audit bureaux is to cater for national advertising markets. At the same time, only the international newspapers require international circulation data for advertising sales.

(By contrast with newspapers, leading magazine titles frequently have significant distribution in several or more countries, and are audited

separately within each; but then the whole invariably comprises autonomous or semi-autonomous ventures, which are treated as indigenous titles within their local patches. Even among genuine international publications, like Time, recent years have seen a drift towards more national split editions for the sake of improving advertising sales.)

*Time Periods for Publishing Figures* (Table 8): All bureaux publish circulation figures (consisting of a mixture of publishers' statements and audited figures) annually or over shorter intervals.

*Regional Break-Out of Circulation Figures* (Table 9): Newspaper distribution has a much more pronounced regional structure in some countries than others. Corresponding perhaps with the degree of regionality, some bureaux offer highly detailed break-outs, even down to the level of arrondissements and communes in the case of France.

*Circulation Audits for Smaller Publications* (Table 10): But for some very minor differences, the same auditing procedures are applied alike to all newspapers regardless of size.

#### 2.3.3. Radio

Ideally, the same choice of measures - ie audience share for monomedia analyses, and daily reach for multimedia analyses of media concentrations - would be made for radio as for television. But, as the internal report indicated, not all national surveys of radio listenership measure the total amount of listening, though they do all supply reach measures. Accordingly, the daily reach measure has been elected for both monomedia and multimedia analyses. Tables 11-14 confirm the definitions employed and the opportunities for analysis.

Definition of Listenership (Reach) (Table 11): The standard definition of listenership is the percentage (or numbers) of a population who are counted as having listened to the station within a specified period. All national radio surveys subscribe to this definition. Most base their estimates on diary or recall data, and only the Greek Hellas survey employs a frequency question instead. There is very little consistency over the time intervals for which reach data are reported, except for daily reach. Three surveys supply nothing more than daily reach figures. Although the British RAJAR survey does not publish daily reach figures, they can be accessed from the diary data. That leaves the Greek Hellas survey as the only one which does not supply daily reach figures, although it does at least supply weekly estimates from which daily figures could probably be arrived at by modelling.

Listening Threshold (Table 12): The data in Table 12 simply emphasize that the criteria for listening vary from survey to survey, with countries divided between those asking for any listening within a set period (usually 15 minutes) and those setting threshold criteria within them of varying degrees of severity. The toughest criteria is set by the Belgian CIM. It will almost certainly cause substantial under-estimation of station reach over short time periods of an hour or two, but it is questionable whether it will make a significant difference over 24 hours.

*Regional Break-outs* (Table 13): As with press circulation data, a wide range of regional break-outs is possible in most countries, which probably reflect the specific market conditions in each instance.

*Other Audience Measures* (Table 14): Table 14 confirms that reach measures provide the only widespread indices of total audience for radio.

### 2.4. Multimedia Maps Of Pluralism

The Green Paper states the need for multimedia as well as monomedia analyses of pluralism.

Measures were chosen for the monomedia analyses on the grounds that they were the most diagnostic of pluralism and/or were most practicable or feasible for the medium in question. However, there is no possibility of combining television audience share with newspaper circulation with radio reach because the three measures differ fundamentally from one another.

Nevertheless there exists a common ground where surveys for the three media yield measures which are nearly identical. Namely, they all measure the total number of contacts with each channel or publication, or what may be termed as average daily contact. We define this as the average number or percentage of a population who have at least one contact with a channel or title each day.

The concept of average daily contact is net of duplication. That is to say, each person counts once and once only in each daily total from which the averages are taken, regardless of the number of viewing, reading or listening occasions to each channel or publication. Similarly, it takes no account of the duration of contacts

In essence, average daily contact is a pure reach measure, being none other than the average daily cumulative audience.

For television and radio, average daily contact - in other words daily average reach - employs the same criterion of media consumption; that is to say, any viewing or any listening. As we have seen, virtually all television and radio surveys either output this measure or are capable of it (more a potential practical issue for television, where channel reach is not a key statistic for advertising sales).

National readership surveys likewise employ a more or less equivalent measure of any reading. Moreover, the average issue readership estimates for daily newspapers (ie number of readers during the publication interval, which is one day in this instance) is virtually the same as daily average reach. It is not literally the same, at least for the Recent Reading methods, which predominate in the EU. This is because the Recent Reading model contains two built-in sources of error, known respectively as "parallel reading" and "replicated reading". We have discussed them in greater depth in the internal report. In brief, parallel reading refers to the reading of more than one issue within the publication interval, thereby giving rise to under-estimation; whilst replicated reading refers to reading of the same publication across more

than one publication interval, thereby giving rise to over-estimation. The errors will compensate to an extent, and our impression is that the overall effects are very small for titles with short publication intervals, such as daily newspapers.

Lastly, the issue of publication interval. The great majority of newspapers are daily, and readership estimates for them may be treated as equivalent to daily reach, or, more specifically, what we have termed average daily contact. Weekly newspapers present a slight problem because they have a longer publication interval. The solution we propose is the same as for circulation: namely, to divide their (weekly) readership estimates by seven. Their actual daily average reach, or daily average readership, will be higher than this as some readers will read them on more than one day out of the publication interval. However, this does not matter from our point of view, since (a) the affects on the audience maps will be very small indeed, and (b) we are interested in counting each reader once only.

## **3. CONCLUSIONS**

The question we have addressed is the feasibility of using audience measures to assess pluralism.

We have taken pluralism to mean diversity of media sources in the broad sense, to which the public is exposed.

Pluralism is easily confused with media competition by virtue of the fact that competitive forces are important in determining the diversity of media sources. More than this, the close links between pluralism and competition may encourage the idea that it is appropriate to employ economic criteria of turnover in order to measure the former. The idea is perhaps the more seductive because of the tendency to think of money as a tangible substance that can be expressed in solid figures.

If so, the idea is mistaken on two counts.

First, no matter how close the causal links between pluralism and media competition, they remain logically distinct concepts. Pluralism concerns audience issues of choice and consumption. As such, it has nothing to do with the economic performance criteria of the media sources. Only audience measures are appropriate for evaluating pluralism.

Second, audience measures may appear less tangible than economic measures of turnover, but they are no less real. Just as there is only one correct answer to the question of how much revenue did a TV station earn during an advertising break, so there is only one correct answer to the question of how many pairs of eyes watched that commercial break. What matters is the accuracy of the measures, granted that their use can be justified. In this respect, there is no reason why financial figures extracted from companies should be any more accurate than audience estimates derived from sampling TV viewers and radio listeners, or from counting the circulation of daily newspapers.

In other words, the evaluation of pluralism requires audience measures, and the question we need to answer is, are the measures that exist up to this task?

In the course of our investigations we have identified six principal conditions, which audience measures must satisfy if they are to be used in international legislation within the EU.

1. Equivalent measures must exist across EU member states.

- 2. Within each member state, surveys must be comprehensive in their coverage and reporting of media properties (i.e. television channels, radio stations, or newspaper titles).
- 3. Surveys must be even in their treatment of media properties.
- 4. Surveys need to be comprehensive in their geographical coverage.
- 5. Surveys need to be conducted regularly across all member states.
- 6. The selected measures output by different surveys must be comparable and compatible by medium.

In our opinion, current national systems of audience measurement fulfil these conditions satisfactorily.

Inevitably, there are some rough edges concerning the availability and comprehensivity of audience data. For example, little audience measurement is conducted in Luxembourg. Or, there are occasional gaps, as with recent two-year interval between Audiradio 1993 in Italy. But, either the effects are small (the population of Luxembourg is about 0.2% of the total population of the EU), or they are exceptional and can be taken into consideration when circumstances arise in which they are needed.

With regard to the measures themselves, we have distinguished between monomedia audience maps, where only one medium is under review, and multimedia audience maps, where television, daily newspapers and radio are combined.

We have recommended the following basic measures for constructing monomedia audience maps.

Television - Audience share: share of total TV viewing time.
 Newspapers - Circulation share: share of daily average number of copies of each issue circulated to the public.
 Radio - Listenership share: share of daily average reach - the average number of listeners listening to a station at least once a day.

Multimedia maps place the additional requirement that the measures are equivalent across media. For this, we have recommended using the daily average contacts. As a result, the radio measure of listenership share remains unchanged, but alternative measures are required for television

and newspapers. We have recommended the following as the equivalent of daily average contacts for television and newspapers:

Television	-	Daily average reach: the average number of viewers viewing a channel at least once a day.
Newspapers	-	Daily average readership: the daily average number of readers per issue.

We have left open the final precise operational definitions, such as what to include within total TV viewing, or which circulation figures to prefer (whether or not to include unpaid for copies, etc.). At this stage, we are only concerned with establishing the broad framework for audience analyses, and the feasibility of the approach.

The method we propose for constructing maps is (a) to identify all the media properties belonging to a media source, (b) find out the audience measures for each, (c) add them, and (d) calculate the share for that media source as a percentage of the total for the medium or media under examination.

We have examined the feasibility of our proposals for some member states of the EU. It seems that there will be no special difficulties in constructing national audience maps or supra-national maps for language zones. We observe that such variations as may exist from country to country over the detailed specification of measures (e.g. universe definitions, composition of circulation measures, etc.) make almost no difference to the share estimates. The measures we have chosen are robust.

Then there is the question of accuracy. It is impossible to assign an exact figure for the accuracy of audience data; however, we are confident that our approach yields highly accurate results at a national level. If, for example, an audience map for television shows a 30% share for media controller (or media source) X, the true figure may be one or two per cent more or less, but it is extremely unlikely to be out by more than that margin. For newspaper circulation the margins of error appear even lower.

Accuracy becomes more of an issue for supra-national audience maps on account of the possible lack of comparability of different absolute measures. Yet, the presumed lack of comparability between audience measures has to be very substantial before it makes a significant difference (say, of two or more percentage points) to the share figures for individual media controllers.

In short, we consider the audience approach to be sufficiently accurate for the legislative purposes that are envisaged. The more important issue is the qualified interpretation of audience maps. In particular:

- The evaluation of audience maps needs to take into account the recency of the figures and intervals during which they were collected.
- Share figures for radio and multimedia maps need to take into account the comprehensivity of the surveys. This is because daily listenership and average daily contacts are based on reach measures, whereby it is only practically possible to estimate the grand total by adding together the individual reach figures for every media property. Audience surveys cover the main media properties, and they will invariably account for the bulk of the reach totals; however, there will always be a shortfall, which needs to be taken into consideration when it comes to interpreting the maps.

In addition, we recommend that:

- 1. Audience maps are based on data from primary sources.
- 2. Where possible, the data cover a period of 12 months. This is to improve the stability of the figures and to take account of seasonal variations in performance.
- 3. The appropriate 12 month interval to choose for analysis is the most recent 12 month interval for which data are available.

These are all broad recommendations aimed at establishing the framework of an audience-based approach for examining pluralism at the level of national and supra-national analyses. Provided the data exist in the appropriate form, our method is equally suited to regional analyses. In considering the elaboration of more detailed rules, we think it necessary for the approach to remain flexible, taking into account the specific media characteristics and needs of each member state. Nor,' as we have already indicated, do we consider that the precise measures have to be identical from country to country for the approach to remain valid. For example, slight discrepancies in the circulation measures between any two countries (e.g., whether or not they include foreign sales) will make almost no difference to the appearance of the audience maps. In short, the approach needs to remain flexible, and it does not need to be over-rigid.

Lastly, we think it important to establish the correspondence between different national definitions of daily newspapers that are used by the sources of circulation data, and the correspondence between them and the definition that the Commission intends to use. We do not expect this to be a significant issue, but it needs to be checked.

In conclusion, the use of audience measures to examine pluralism is both valid and practically feasible. For those who are familiar with audience data this should not come as a surprise. After all, the national sources of audience data, which are the foundations of this approach, are with rare exceptions widely accepted by public service and commercial media alike.

**TABLE 1 : TELEVISION - CHANNEL SHARE** 

Standard Definition: Share of total TV viewing over a defined time period for a population

					<b>Availabi</b>	ity Of Channe	el Share Data		
			Geograph	ic Scope	Time	Period		Tanget Audie	DCê
Country	Standard Defintion	Base of Total Viewing (see code)	National	Regional	Month	Year	Adults	Individuals	TV Homes
North Belgium	YES	Ľ	YES	YES	YES	ON.	YES	YES	YES(main shopper)
South Belgium	YES	Е	YES	ON	YB	YBS	YES	YES	Q
Denmark	YES	× · · ·	YES	YES	YES	YES	YES	YES	YES
France	YES	V	YES	NO	SEK	YES	YES	YES	YES
Germany	YES	V	YES	YES	Sar	YES	YES	YES	YES
Greece	YES	E	YES	YES	SAY	ON	YES	YBS	NO
Ireland	YES	V	SEIX	YES	NO	ON	YES	YES	ON
Italy	YES	V	SEX	YES	YES	ХES	YES	YES	YES(all homes)
Netherlands	YES	E	YES	YES	YES	YES	YES	Say	NO
Portugal (AGB)	YES	E	YES	YES	YES	YES	YES	YES	ON
Portugal (Ecotel)	YES	A,B	YES	YES	YES	YES	ON	YES	YES(all homes
Spain	YES	A	YES	YES	YES	YES	YES	YES	YES(all homes)
United Kingdom	YES	c	YES	YES	YES	YES	YES	YES	0N

Base of Total Viewing

A - All TV Channels only

B - A selection of TV channels (eg main channels)
C - A selection of TV channels delayed viewing by video timeshift
D - A selection of TV channels including delayed viewing by video timeshift
E - All TV channels plus all other uses of TV set (eg video games, pre-recorded videos)

**TABLE 2: TELEVISION - CHANNEL REACH** 

Standard Definition: The cumulative percentage of a population who have viewed a channel at least once over a defined time period

						Availabi	lity Of C	hannel Ru	each Data			I
			Geograph	nic Scope		Time P	eriod			Target Audience		
Country	Standard Definition	Reach Threshold*	National	Regional	Daily	Weekly	VDA	WDA 	Adults	Individuals	TV Homes	
North Belgium	YES	Any Viewing	YES	ON	YES	YES	ON	ON	YES	YES	ON	
South Belgium	YES	Any Viewing	YES	ON	YES	ON	YES	YES	YES	YES	ON	
Denmark	YES	5 Minutes	YES	YES	YES	YES	on	ON	YES	YES	YES	
France	YES	Any Viewing	YES	ON	YES	ON N	YES	YES	YES	YES	YES	
Germany	YES	Any Viewing	YES	YES	YES	YES	YES	YES	YES	YES	YES	
Greece	YES	Any Viewing	YES	YES	YES	YES	YES	YES	YES	YES	YES	
Ireland	YES	Any Viewing	YES	ON	YES	YES	YES	YES	YES	YES	YES	
Italy	YES	Any Viewing	YES	YES	YES	YES	YES	YES	YERS	YES	YES	
Netherlands	YES	Any Viewing	YES	ON NO	YES	YES	O N	ON	YES	YES	.ON	
Portugal (AGB)	YES	Any Viewing	YES	YES	YES	0N N	YES	YES	YES	YES	NO	
Portugal (Ecotel)	YES	Any Viewing	YES	YES	YES	YES	YES	YES	YES	YES	All Homes	
Spain	YES	Any Viewing	YES	YES	YES	YES	ON	YES	YES	YES	All Homes	
United Kingdom	YES	3 consecutive minutes	YES	ON	NO	YES	YES	ON N	ON	YES	ON .	ł
* Any Viewing	r denotes th	e minimum p	veriod for	channel re	gistratio	n. This	varies fi	tom syst	em to system	n, but the thr	esholds will	all be one

minute or less. \*\*WDA - Weekly Daily Average . \*\*\* MDA - Monthly Daily Average

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TABLE3: TELEVISION - TOTAL DAILY AVERAGE VIEWING\*

Standard Definition: Total daily average TV viewing per head expressed in minutes for a population

	•				<b>Availability Of</b>	Total Daily A	verage Viewing	g Data	
			Geograph	uic Scope	Time	Period		Target Audie	DCC
	Standard	Base of Total			,				
Country	Definition	Viewing (see code)	National	Regional	Month	Year	Adults	Individuals	TV Bomes
North Belgium	YES	ш	YES	YES	YES	ON	YES	YES	YES(main shopper)
South Belgium	YES	Е	YES	YES	YES	YES	YES	YES	ON
Demark	YES	A	YES	YES	YES	YES	YES	YES	YES
France	YES	A	YES	ON	YES	YES	YES	YES	YES
Gemany	YES	A	YES	YES	YES	YES	YES	YES	YES
Greece	YES	٤E	YES	YES	YES	ON	YES	YES	ON
Ireland	YES	V	YES/NO	ON	YES/NO	ON	ON	YES/NO	YES/NO
Italy	YES	A	YES	YES	YES	YES	YES	YES	YES(all homes)
Netherlands	YES	Э	YES	YES	YES	YES	YES	YES	ON
Portugal (AGB)	YES	Е	YES	YES	YES	YES	YES	YES	ON
Portugal (Ecotel)	YES	A, B	YES	YES	YES	YES	NO	YES	YES(all homes)
Spain	YES	A	YES	YES	YES	YES	YES	YES	YES(all homes)
United Kingdom	YES	С	YES	YES	YES	YES	YES	YES	ON

**Base of Total Viewing** 

A - All TV Channels only

B . A selection of TV channels (eg main channels)

C . A selection of TV channels delayed viewing by video timeshift

D - A selection of TV channels including delayed viewing by video timeshift E - All TV channels plus all other uses of TV set (eg video games, pre-recorded videos)

\* In completing the table, YES means YES for both total daily average viewing and total daily average viewing by channel. Similarily, NO means NO for both measures. YES?NO mean YES for total daily average viewing and NO for total daily average viewing by channel. Again, NOMES would denote the opposite.

**TABLE 4 : TELEVISION - CHANNEL PENETRATION** 

Households VIIV g ξĮ, g Ŕ XEX S Ŕ Ŕ 202 202 2 2 Ň Ř Households 0 Z 0 Z Ŕ 9 Z 9 Z 02 2 ស្ត Ŕ 2 YES **YES** 02 2 Target Audience Availability Of Channel Penetration Data ÷ Individuals SE SE Ŕ 02 XB Ŕ Ŕ X9X 2 0 Z Si YES Ϋ́Ε Adults YES 0Z Ř Ŕ SEX X g 02 02 YES 02 2 YES 202 Regional Ŕ Ŕ 02 Ŕ Ŕ Ŕ Ϋ́ Ŕ Ř YES Х Ю XIX S Kes Geographic Scope National **K** XBS Ř **K**is Ŕ ξĘ, XBS YES YES Ś YES Ŕ YES Frequency of Updating Continuous Continuous Continuous Annual Amual Amual Annual Monthly Annual Annual Amual AJULA Amual Data (see code) Penetration Source of U ß 2 < < < < ∢, 4 Q m æ ∢ (Individuals) Standard Definition Ŕ Ř Ř Ŕ Ŕ Ŕ ରିର୍ଷ YES 5 SEX YES United Kingdom Portugal (Ecotel) North Belgium South Belgium Portugal (AGB) Netherlands Denmark Germany Country Ireland Greece France Spain Italy

Standard Definition: Proportion of <u>homes</u> within the universe/sub-uiverse, which can receive a channel, expressed as a percentage

Base of Total Viewing: (A) Establishment Survey

(B) Multimedia Survey

(C) Panel

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**TABLE 5 - PRESS: BROAD MEASURES OF AVERAGE ISSUE CIRCULATION CLOSEST BROAD MEASURE** 

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Country	Audit Bureau	Net Print Run	<b>Gross Distribution</b>	Net Distribution
Belgium				ΥES
Denmark				ΥES
France	-	YES		YES
Germany		YES		YES
Greece				
Ireland	, .			YES
Italy		YES	YES	YES
Netherlands				
Portugal		YES		
Spain		-		YES
United Kingdom				YES

Gross Print Run: All printed copies Net Print Run: Gross print run less spoiled copies Gross Distribution: All externallly distributed copies Net Distribution: Gross distribution less returns

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TABLE 6 - PRESS: COMPONENTS OF CIRCULATION FIGURES

	FULI	L PRICE	REDUCI	ED PRICE *		FREE CO	PIES		UNSOLD
Country	News-stand	Subscription	News-stand	Subscription	Permanent Subscription	Compliment aries	Vouchers	File Copies	Returns
Belgium	YES	YES	YES	YES	YES	ON	NO	ON	ΥES
Denmark	YES	YES	Some (50%)	Some (50%)	Some **	ON	NO	ON	NO
France	YES	YES	Some (50%)**	Some (50%)**	Some **	ON	ON	ON	
Germany	YES	YES	ON	Some (75%)**	YES	YES	ON	.ON	ON
Greece									•
Ireland	YES	YES	Some (20%)**	Some (20%)**	Some **	NO	NO	ON	NO
[taly	YES	YES	YES	YÈS	YES	YES**	YES**	YES**	YES
Netherlands									
Portugal	YES	YES	YES	YES	YES			- -	ON
Spain	YES	YES	YES	YES	YES	YES	YES	YES	YES
United Kingdom	YES	YES	Some (20%)**	Some (20%)**	Some **	NO	ON	ON	ON

\* Figures in brackets denote threshold for treating reduced price as paid for circulation. Copies paid for below threshold treated as "Free."

\*\* France: (i) Threshold of reduced paid circulation set at 50% of basic price. (ii) Only requested free subscription is included.

\*\* Denmark: All "free" circulation copies treated as miscellaneous, with limits on number which can be included as part of total AIC. Allowance ceilings are in order of 0.5%-2% of circulation, being lower proportionately for high circulation titles. Further criteria define what can be included as "miscellaneous." \*\* Germany: 1% bulk subscription with at least 75% of full subscription are accepted as subscription but regarded separately.

\*\*Ireland and United Kingdom: Reduced subscriptions are broken out into 3 bands: (a) 50% + (of cover price), (b) 20%-49%, (c) below 20%. (a) and (b) are included in the total AIC figures. (c) is excluded for nationals, but for some regionals. Permanent free subscriptions are only included if the requests are proven. \*\* Italy: Grouped as miscellaneous.

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**TABLE 7 - PRESS: FOREIGN CIRCULATION** 

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Country	Inclusion of Foreign Sales	Break-out of Foreign Circulation
Belgium	ΥES	(a) Luxembourg; (b) Others more than 5% of the total population
Denmark	ON	NA
France	YES	All "Foreign"
Germany	YES	All "Foreign"
Greece		
Ireland	YES	(a) United kingdom (b) Other "foreign"
Italy	YES	All "Foreign"
Netherlands		
Portugal	YES	All "Foreign"
Spain	YES	Any country in Europe or America where distribution > 1% of total population
United Kingdom	• YES	<ul><li>(a) Eire</li><li>(b) Other "foreign"</li></ul>

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TABLE 8 - PRESS: AVERAGE ISSUE CIRCULATION - TIME INTERVALS - PERIODS FOR WHICH FIGURES ARE GIVEN

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Country	Calendar Month	Quarter	Half Year	Year	Other
Belgium				YES	
Denmark	YES	· · · ·	YES	YES	
France	YES	ON	ON	YES	ON
Germany	ON	YES	ON	ON	ON.
Greece				1	
Ireland	YES (National)		YES (Regional)		
Italy	YES	ON	ON	YES	12 monthly rolling averages including April and August
Netherlands					
Portugal			••		
Spain				YES	
United Kingdom	YES (National)		YES (Regional)*		

Ireland and United Kingdom: Nationals are also reported monthly as six-month rolling averages.

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TABLE 9 - PRESS: REGIONAL BREAK OUTS OF A VERAGE ISSUE CIRCULATION

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Country	Population (m)	Large Regions	Smaller Regions
Belgium		ON	ON
Denmark		3	11 Areas
France		9 UDA (=E INSEE Regions): 21 INSEE	99 Departments
Germany		16 Lander	Local districts, communities with 3,000 inhabitants
Greece		-	
Ireland		ON	ON
Italy		20	94 Provinces
Netherlands	ť		
Portugal			
Spain		17	52 Provinces
United Kingdom		ON	ON

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TABLE 10 - PRESS: CIRCULATION AUDITS FOR SMALLER PUBLICATIONS

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Country	Treatment of Smaller Publications (If Different)
Belgium	NA
Denmark	NA
France	Local Newspapers. (1) Total circulation split by department and arrondissement. (2) O.J.D optional. Paid circulation split by arrondissement and communes, with population and number of households
Germany	None
Greece	
Ireland	None, but slightly different criteria applied for inclusion in AIC totals*
Italy	NA
Netherlands	
Portugal	None
Spain	None
United Kingdom	None, but slightly different criteria applied for inclusion in AIC totals*

Ireland and United Kingdom: See table 1 notes for treatment of reduced price copies sold below 20% of cover price.

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**TABLE 11 - RADIO: DEFINITION OF LISTENERSHIP** 

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Standard Defintion: Percentage (or numbers) of a population (eg adults, individuals), who are counted as having listened to the station within a specified period.

Country	Standard Definition	Average Day	Average Week	Average Month	Specific Month	Specific Quarter	Specific Half-year	Full Year	Other
Belgium	ΥES	YES				YES			
Denmark	YES	YES	YES	YES	YES	YES	YES	YES	
France	YES	YES	YES		·	YES		YES	
Germany	YES	YES							
Greece	¥ES*		YES	-			•		
Ireland	ΥES	YES	YES	YËS			YES	YES	
Italy	ΥES	YES		· · ·			•		
Netherlands	YES	YES	YES						YES*
Portugal	YES	YES				YES		ΥES	
Spain	ΥES	YES							
United Kingdom	YES	*ON	YES						

\* Greece: Based on frequency question

\* Netherlands: Quarter, half year & year reach figures provided on tape as probabilities. Other intervals are available on request.

\* United Kingdom: Day reach figures are not published, but can be accessed from the data.

TABLE 12 - RADIO: LISTENING THRESHOLD AS PROPORTION OF REPORTING INTERVALS

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Country	Unit Reporting Interval (Mins)	Threshold Criteria (Mins)	Threshold Proportion Of Listening (%)
Belgium	15	10	66-7%
Denmark	15/60	ANY	%0
France	. 15	ANY	%0 .
Germany	15	ANY	%0
Greece	ΑΝΥ	ANY	%0
reland	15	8	53.3%
taly	15	2	2
Vetherlands	15	8	53.3%
Portugal	5	ANY	%0
Spain	15	ANY	%0
United Kingdom	15	З	33.3%

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TABLE 13- RADIO: REGIONAL BREAK-OUT OF STATION LISTENERSHIP

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Country	National	I arger Regions	Smaller Regions	Station Recention
				Universe
Belgium	YES	5 Nielsen	43, & 24 cities North/South	ON
Denmark	YES	15	276 communes	YES Combination of communes
France	YES	20	60, & 98 main cities in regions and departments	ON
Germany	YES	YES	YES	YES
Greece	ON	2 (Athens, Salonica)		ON
Ireland	YES	7	24 Station franchise areas	ON
Italy	YES	4	. 19	ON
Netherlands	YES	5	. 25	YES
Portugal	ON	6 Marktest Areas	To be defined	ON
Spain	YES	17 Comunidad Autonoma	-	ON
United Kingdom	YES			YES Station defines own areas

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**TABLE 14- RADIO: OTHER TOTAL AUDIENCE MEASURES** 

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Country	Other Measure
Belgium	ON
Denmark	NO
France	YES - Audience cumulation (national radio panel early 1993)
Germany	ON
Greece	ON
Ireland	ON
Italy	ON
Netherlands	NO (Probabilities) see earlier table
Portugal	ON
Spain	
United Kingdom	YES - Hours of listening - absolute '000s / - hours per listener - Audience share of all listening in defined area

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