

Thursday 23 March, 2023

To the Manager Content and Platform Projects Section,

We are pleased to provide this submission to the Australian Communication Media Authority which is seeking feedback on a news measurement framework to monitor levels of diversity and localism across the nation's media landscape. This submission is authored by Deakin University researchers Professor Kristy Hess, Professor Matthew Ricketson, Alison McAdam and research fellow Angela Blakston. We are experts in studying and understanding local news media futures, especially in rural and regional areas.

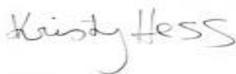
Our team is about to conclude an Australian Research Council Linkage project – Media Innovation and the Civic Future of Australia's Country Press (LP180100813). In March 2023, the research team released a final report into the future of small-town and suburban news providers with a list of 22 recommendations to support the sustainability of this important aspect of the eco-system. It offers urgently needed evidence and strategies to rethink media innovation, inform industry practice and federal communication policy. The full report is available at www.localnewsinnovation.org



From May 2023, we will also lead a second Linkage grant partnering with the Australian Broadcasting Corporation (ABC) and Griffith University to consider ways the nation's key public broadcaster can support struggling areas of the local news ecology into the future (LP220100053). This project aims to understand how Australia's main public broadcaster, the ABC, can best support public interest journalism in rural and regional communities, with a specific focus on fragile and underserved areas of the nation's local news ecosystem. The project will develop new knowledge around media power and how news providers can work together to secure the sustainability of local news.

We believe a news measurement framework is essential to provide transparency as to the health of the nation's news ecologies, to inform and complement our own research and to guide future policy decisions and government interventions to support public interest journalism. It is vital that Australia's media environment provides the conditions for news services to not just survive but to flourish. Given our area of expertise, the focus of our submission is on aspects of localism rather than broader questions around the news measurement framework that relate to issues of pluralism and diversity at a state and national level.

Yours sincerely



Professor (Communication), Deakin University, on behalf of the project team

The research: Media Innovation and the civic future of Australia's country press

This three-year project has involved extensive audience engagement via national surveys, focus groups involving news producers and staff (editors, journalists, advertising managers) and interviews with start-ups and long-serving news proprietors. A PhD project has examined the underlying factors in the sustainability of several Australian local news mastheads that have defied the perceived crisis in journalism. A survey of editors' use of and attitudes towards metrics and analytics was also conducted. There has been extensive engagement with academic literature, policy documents, reports about the news media sector in Australia and internationally. Key findings include:

Audiences value rural and regional news, want more of the 'local' and print isn't dead

Our national survey of almost 4200 local news readers found a preference for accessing news from a local masthead in print and would prefer to read a digital news site that had the look and layout of a newspaper. Significantly, audiences overwhelmingly view their newspaper as an essential service for their community. Audiences believe they should be invited to have a say about government policies and decisions affecting the future of local newspapers. Local newspaper readers indicate they are five times more likely to go directly to a local news website for their local news than Google or Facebook and almost 10 times more likely to go to the local newspaper website over a local council website for their local news and information.. Audiences were not in favour of their newspaper subscriptions being made tax deductible and overwhelmingly indicate that any additional funding for local news should be directed to employing more local journalists to report news, over increasing digital connectivity and digital innovation products. Audiences want more local content, stories about people's successes and achievements and investigative stories.

There is well-intended but at times misdirected government support

In 2020-21, the Federal Government along with states South Australia, Queensland and Victoria collectively spent more than \$450 million on advertising to keep Australians informed about their policies, programs and public awareness/ prevention campaigns as well as public notice advertisements, such as tenders and recruitment. This is a substantial sum of money that provides important revenue for media platforms. However, over the past 10 years this government advertising spend has shifted towards social media giants and metropolitan news outlets with larger digital reach at the expense of small rural and regional outlets serving niche geographic markets in print and digital formats. This has happened across all levels of government (local, state and national) and amid concern about the impact of social media on the quality of public discourse and the importance of providing reliable news and information channels serving as the public record. There too remains a digital divide for parts of rural and regional Australia, which continue to struggle with poor-quality internet and where some (especially older) citizens experience problems with digital access either because they do not have or are not comfortable with using technology. The role of this type of government advertising is a powerful lever that remains largely under-examined in terms of its value for news media providers that invest in public interest journalism. Our research notes there has been, at times, a digital innovation bias attached to subsidies to

support the sector without evidence-informed research to appreciate the contexts in which news circulates in rural and regional areas. We also found there has been inadequate support for small-town news providers with lower turnover and for start-ups, especially in news deserts or areas that may be on the periphery of news zones. These start-ups play a vital role in rejuvenating quality news and information in Australia and ensuring diversity of information in non-metropolitan areas.

Clearer recognition of and support for place-based public interest journalism in a digital era

Any future investigations into media diversity and policies for “local” news should recognise the importance of place-based public interest journalism in rural and regional areas as a first-tier level of local reporting. This involves encouraging news providers to more clearly outline their geographic territory – the area in which they provide a reliable form of public record and quality source of regular civic, social and political information (see Magasic, Hess & Freeman, 2023). Local television licensing arrangements, for example, include ‘local’ geographic areas that can stretch over 800km in diameter, while government advertising agencies also appear to preference news outlets with wide online audiences. This focus on strong digital reach (i.e: the ability to reach a larger audience online and across geographies) can encourage practices such as generating news that produces ‘click bait’ that may not be in the interests of democratic reporting and probably of little value to small-town news audiences. Our research suggests there are ‘goldilocks’ zones in which a small news outlet can feasibly serve audiences with place-based public interest journalism. These news zones tend to cover areas between a 50-100km radius. Most importantly, such zones highlight towns and districts that are on the periphery of a local news outlet’s geographic reach, and which may be more susceptible to receiving poor quality news coverage and may risk becoming news gaps. Zones enable a clearer distinction between types of local media coverage (place-based or tokenistic) and offer opportunities for how other news organisations such as the ABC could best assist rural and regional areas by supporting and amplifying place-based journalism.

Recognising and encouraging collaboration

The importance of working together was a rich theme to emerge from the research and there is a need for small news providers within the Country Press Australia network, the industry partner on this project which serves the interests of about 200 independently-owned local mastheads, to enhance collaborative efforts across regional, state and national levels. This is highlighted in five main ways including: Working collectively to highlight, discuss and advance issues and opportunities for rural and regional Australia through shared investigative and constructive journalism initiatives; The need for a national rural news producers’ community of practice to build relationships, reduce isolation and share problems and opportunities; Coordination to help streamline national and federal advertising across all news providers in the network, especially government public awareness campaigns and big retailers, such as supermarkets and retail; A parliamentary inquiry has recommended Australia’s local sector adopt a BBC-style model of collaboration, which has been touted as a potential solution to supporting the local news crisis in Australia. Our research found some reluctance among news producers to this model, but there is benefit in examining the contexts in which the nation’s public broadcaster can best support local news needs, especially in fragile areas of the local ecology; Collaboration within the media sector, and joined by government and education providers, to promote regional journalism careers and

enhance public attitudes and perceptions about rural and regional careers more generally. A key challenge for Australia's local news media is the recruitment of talent, especially in smaller rural areas. Our research suggests there is a need to shift the focus towards improving perceptions of regional media professions, beyond that of a 'starting ground' or 'stepping stone' to a big city career. We suggest targeted incentives to encourage more experienced journalists into the regions, given small newsrooms in rural areas have struggled to attract and retain cadet journalists, despite significant government support to help cover salary costs.

Mapping work must be more nuanced and complemented by qualitative research

Our ongoing PhD research has been examining in detail some of the factors that influence the sustainability of local news outlets that have maintained or increased their paying audience (across print and digital platforms) over a five-year period, and amidst the COVID-19 pandemic. It is important to acknowledge that some of the factors that broader research and commentary suggest may influence news sustainability – such as demographics (i.e.: older populations), environment and experiences of natural disasters – are not consistent across each site. The average age of populations at each case study location in the PhD research varied considerably (from 42 to 53) and the geographies in which they were located ranged from mountainous to flat, dry farmland, from small island to mountainous regions, to flat dry farmland. There was also no consistency in the frequency or occurrence of natural disasters affecting these locations, suggesting that their sustainability was not dependent on their role as an emergency information provider during times of disaster. This PhD research also suggests that, while mapping as a methodology is a useful visualisation tool for policymakers and wider audiences, it requires qualitative data to contextualise and explore nuances within the local news ecology. Rather than simply mapping where news media is located or not, there are broader factors such as reach, resourcing and visibility that need to be considered.

ACMA consultation response

Our submission focuses on five key questions posed by ACMA in its consultation paper. We will engage with questions 2, 3, 4/5, 10, 11/12 in discussing the scope of the proposed new measurement framework. As highlighted, our focus is on aspects of localism *given our national and international standing/expertise in this area*.

2: Do you consider the framework would be an effective tool in measuring and tracking levels of local news in Australia?

Overall we support the framework and consider it a useful tool in measuring and tracking levels of local news. We feel its value, however, could be enhanced by providing clearer objectives and a stronger statement of intention for its use and application, especially for informing future policymaking about local news provisions. This is necessary to ensure the measurement framework is fit for purpose. We note in the consultation paper there is the intention that "The ACMA's work on the news measurement framework is expected to inform development of the Department's News MAP throughout 2023" (p.5) but this should be clearer. From our vantage point, we see benefit, for example, in the news measurement framework helping to inform future federal and

state government advertising expenditure to ensure more informed and targeted decisions are made around dissemination of public notices and awareness campaign spending, especially in rural and regional areas. The framework may also inform where the ABC might be able to provide assistance to support news sustainability so initial mapping work and development of indicators should reflect this.

The measurement framework should also help to provide greater transparency and accountability when it comes to government intervention by ensuring news providers that receive government support are indeed providing quality, original public interest journalism and that such funds are supporting media pluralism or filling identifiable or potential news gaps.

3: Do you agree with the proposed scope of the news market?

If the framework is to support policymaking into the future and focus on securing public interest journalism, we support ACMA's decision to restrict the scope of local news outlets to 'professional' sources of news that can show a level of connection to the local area and provide a mix of social, political and civic information. This does not mean that the framework cannot be expanded in the future, however, to include sources of news outside these parameters. The framework should include categories distinguishing commercial, not-for-profit and volunteer news organisations. Definitions of 'journalism' should be more clearly aligned to that of a recognisable professional practice rather than aligned solely to any established news organisation, especially in recognition of newer hyperlocals or individual operators.

However, given the urgency for more evidence-informed decisions about how and where to support local news provisions, the news market is appropriately scoped.

Our team, does not consider local government-run newsletters, newspapers or websites as providers of public interest journalism to encourage independence and impartiality from political parties and processes where possible as part of journalism's normative Fourth Estate function.

4 & 5: Do you agree with the proposed key measures of localism, would you suggest any changes or additions?

We support the key measures of localism and associated indicators but make the following suggestions:

- In regards to measuring impact for localism, a more nuanced measure should be considered than merely relying on digital reach metrics (which can encourage click bait). The degree to which a local news outlet leads its community through facilitating conversations, solutions and constructive journalism initiatives, editorials are important to measuring impact. This requires qualitative data and analysis.
- Some effort needs to be undertaken to define 'originality' so that content produced by journalists it is distinguishable from community-contributed content, media releases, paid advertising and artificial intelligence.

- The degree to which a news outlet has received government support (directly via subsidies, indirectly via government advertising) should be considered an important factor “driving healthy local news production in a locality”. That said we believe terms such as ‘health of an ecology’ used in the consultation report is too ambiguous and should be replaced by “quality news provisions”. Quality being determined by availability, originality reliability and relevance of news provisions.
- The extent to which a news provider serves as a reliable public record is paramount to news quality and public interest journalism provisions yet the extent to which a news source invests in the archiving and public accessibility of content is not an indicator.
- There needs to be further clarity around baseline of source and opinion, as highlighted in the measurement framework. It is important that the ACMA does not encourage ‘balanced’ reporting in every story. It is widely documented that this approach can at times give credence and voice to toxic and unconstructive voices and perpetuate a conflict narrative. There is a need to consider the extent to which a news outlet promotes and moderates public discussion as an indicator of impact.

10: What are the most significant outstanding data gaps and how should these be prioritised.

We believe there is a need, first to develop a typology of ‘local’ news provisions in Australia, one which clearly distinguishes, for example, place-based reporting from those services that amplify local issues for broader state and national audiences or engage in one-off pieces of quality investigative or feature reporting. Such a typology recognises the degree to which news is original and regular and the extent to which journalistic resources are provided ‘on the ground’.

We agree that LGAs are the most appropriate geographic indicator for the purposes of the measurement, subject to more nuanced mapping work as recommended above. We suggest one of the biggest oversights in the consultation report is not including LGAs with populations below 10,000. Our preliminary research suggests more than 50% of LGAs in Australia have populations below 10,000. Most of these are in rural and regional areas and some cover vast geographic territories. Some may be more susceptible to news gaps or have experienced a paucity of independent civic information. In the interests of equality and to inform future policymaking, they should be included in the news measurement framework.

We encourage further academic research to provide and guide more nuanced mapping indicators in any preliminary work being undertaken to survey the existing media landscape in Australia. Within LGAs, for example, there should be indicators of feasible resource reach within the geographies a news outlet serves, along with mapping markers that distinguish place-based reporting from other news outlets that provide ‘local’ news. In our most recent ARC Linkage project, we have suggested for example the mapping of goldilocks zones (see appendix 1) to help policymakers and the ACMA identify the optimum zones for place-based local news provisions source and produce original civic, social and political information relevant to a locality. It also highlights the perimeters of these zones in which such services may be more vulnerable. We believe the goldilocks zones have immense practical use defining or categorising local news zones

and measuring the quality of local journalism provided when considering factors like accessibility, relevance, and reliability.

11 & 12 Do you have views on potential pilot projects that ACMA could undertake. What should ACMA's role be and are there opportunities to collaborate with research organisations to help implement the news measurement framework?

It is our strong view that government departments and funded bodies should increasingly look to, and support partnerships with the University sector to solve problems of national significance, especially where there is clear and appropriate expertise. This is especially important at a time when the very value of academic research is increasingly measured against external income and requires the support and confidence of organisations such as the ACMA.

ACMA should look towards academics and promote partnerships between the ACMA and universities with the most appropriate track records to collaborate on pilot projects informing the news management framework.

Gaps highlighted in our response to question 10 are all necessary pilot projects. Further, additional research should be undertaken to inform indicators of Impact/influence: Case study research that determines keystone media (Nielsen, 2017) is valuable. It identifies those outlets that provide news not offered anywhere else but which other media can build on and which influence community progress and conversations in tangible ways.

We also encourage news networks and organisations to work collaboratively with The Public Interest Journalism Initiative and the University sector to provide regular, relevant data needed to inform the news framework.

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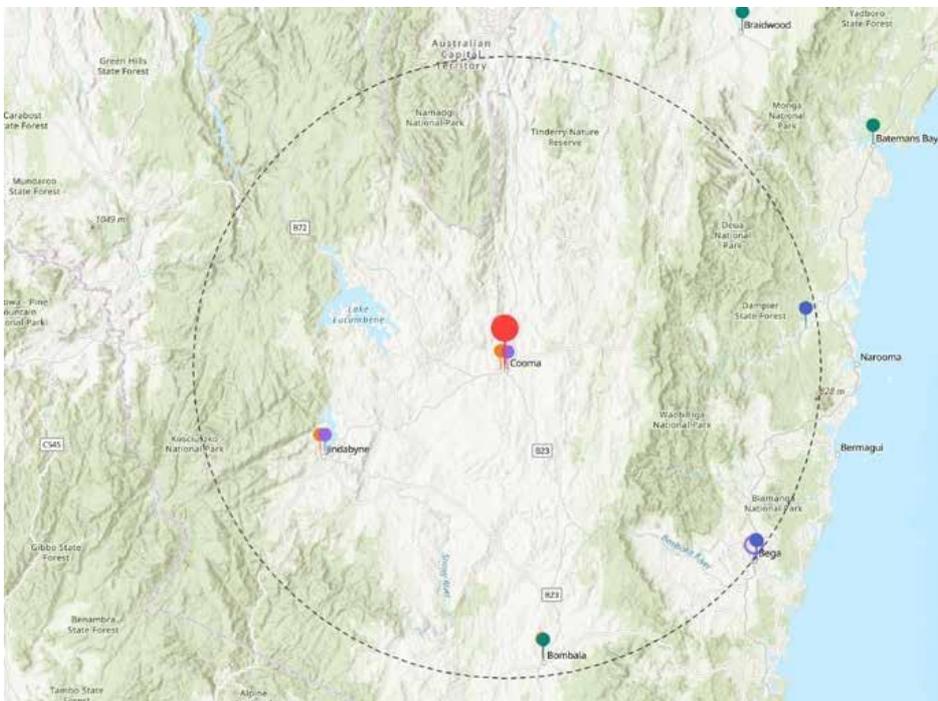
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APPENDIX 1

We suggest there is a need to map what we term ‘goldilocks zones’ in work on media diversity and assessments about local news provisions, an idea borrowed from astronomy and astrophysics, but which has not been applied to media and journalism. In the fairy tale *Goldilocks and the Three Bears*, Goldilocks is looking for certain conditions to be ‘just right’. Astronomers use the term ‘goldilocks zone’ to describe clearly defined areas of our galaxy where conditions and resources are ‘just right’ for life to develop (see e.g., La Bella, 2015). In journalism scholarship, Usher (2021) uses the term ‘Goldilocks’ to describe *newspapers* in the US (metropolitan and regional) that share a financial dilemma because of their size - they are not big enough to have a national audience, but they aren't small or specialised enough to have a niche audience. We, however, borrow from the scientific application of the ‘goldilocks’ *zone* to explore the ideal conditions for quality and original place-based reporting to occur and be supported in an Australian context. We use the term to describe the geographic zones that enable local news providers to feasibly provide place-based resources and print distribution costs in a way that provides news in a meaningful, credible and reliable way for audiences. We suggest a local news provider in rural and regional Australia serving a geographic radius of no more than 100km (or an hour’s drive by car, depending on terrain) around a newsroom’s central operations is the *limit* for a small-town news provider’s ability to serve a locality’s news needs on a day-to-day basis. This, we suggest, is the zone in which news producers can feasibly pay for reporters to travel to ‘cover’ news, be present in place and acquire adequate local knowledge and professional relationships in a region. We suggest the optimum range within this zone is within a 50km radius. These boundaries can shrink, dependant on factors such as limitations on newsroom resourcing, digital connectivity, terrain, population density and how an audience itself perceives ‘localness’.

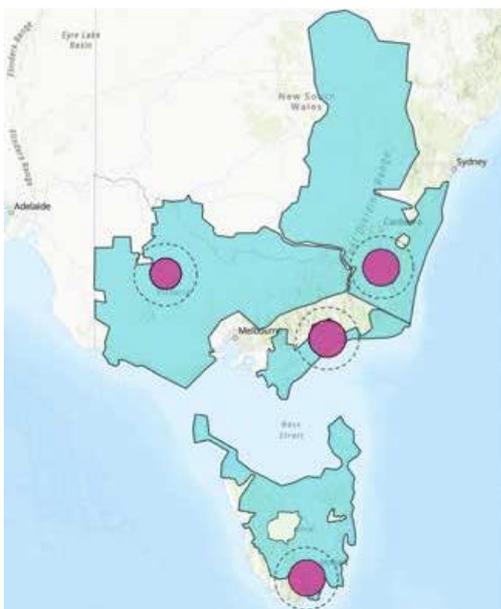


Depiction of a ‘goldilocks zone’ – maximum 100km radius around a masthead (red marker). The other markers on the map show the location of other mastheads, radio stations and community social media pages in the zone, indicating a news ecology (McAdam, 2023).

A 100km radius is significantly smaller than current television licensing arrangements, for example, which can stretch up to 800km in distance. Within these vast geographic zones, licence holders are required to produce at least five news bulletins a week and have a ‘minimum level of material of ‘local significance’ (Australian Government, 2017). Local news producers in this ARC study say that quality news comes from maintaining strong relationships with audiences, news sources and advertising clients, which depends on in-person contact, visibility and local knowledge. Providing physical resources then, can be difficult to sustain across larger distances, with some news producers highlighting that driving more than one hour to a job can be too costly and time consuming. This means that areas on the periphery of a 100km radius are difficult to cover unless content is supplied to a news provider or sources are contacted via digital communication channels.

Of course, we do not discount the role digital technology can play in helping to source news at both the centre and peripheries of these zones, especially in generating contributed content from dedicated volunteers or ‘stringers’. However, given all news providers in our research highlight the importance of presence in place as a way of building legitimacy, such a zone should be considered in any mapping that measures information reliability and quality, along with an assessment on where local journalists are physically ‘based’. Perhaps most importantly, such zones point to areas on the periphery of a news outlet’s boundaries where news coverage may be more limited. In future national work on media diversity, small-town news outlets within such ‘goldilocks zones’ might represent a Tier 1 or primary type of place-based reporting to recognise and appreciate the significance of serving niche geographic audiences. This may also lead to more clearly defined expectations and roles of other media outlets, which may offer a more ‘regional’ or outwards focus to their work.

It is also important to note that local news producers align their ‘imagined community’ boundaries with the edges of towns, cities, suburbs, local government boundaries and typographical features, such as coastline, mountain ranges and rivers. There are instances of local government areas that serve larger land masses being home to several mastheads, and areas where one news provider covers two or more local government areas. Local government boundaries, however, are an important element in shaping how local news providers devote resources to local political coverage.



This map shows four commercial television licences (depicted in blue) that spread across areas of New South Wales, Victoria and Tasmania. For comparison, the map also shows our suggested ‘goldilocks’ zones (shown as pink circles) that have a 50km radius, as well as the outer limits of these zones (100km radius circles, shown as dashed circles).