

To whom it may concern

As a background to this submission, I would just like to say that I have never made a 'formal' submission or the like to any government or regulatory body before. However I consider the matter of the proposed NZME-Fairfax merger is of such importance that I want to lend my voice of concern to the issues and implications of such a merger, specifically on the matter of plurality. It's so important that i've come home to write this on a day when i should be very busy with real paid work.

Firstly, I would like to give support to the Commission's draft determination as it relates to concerns over plurality in the New Zealand market and also the conclusions reached in the Foster and Levy Expert Review of the Draft Determination as it relates to plurality.

Although not employed in the industry i have great interest in media and journalism and especially in objective, balanced and concise coverage of local politics and the industry's role in holding to account, those in power without fear or favour.

I believe that corporate, revenue driven media whose income relies in great part on advertising revenue generated from large corporate and multi-national advertisers, has a vested interest in maintaining and promoting the most corporate friendly political parties, policies and governments.

Further to this point, corporate-friendly political parties have a vested interest in at the very least co-operating and colluding with the media operations who might best serve the political party's interests. We have seen much evidence of this in recent years. This scenario is not in the public interest.

The applicants in this case are such corporate media and their merger would create one giant media monolith which would almost completely dominate the print media in this country.

Additionally, the combined resources of their online outlets would dominate available NEW ZEALAND-centric, mainstream online news and current affairs.

Combined with the NZME's flagship radio station, Newtalk ZB (whose newsroom feeds all of NZME's other radio stations nationwide) there is the potential for the combined NZME-Fairfax entity to set the political agenda and control the political narrative to a greater extent than their 'competing' operations already do.

No matter what political views one holds it is ideal that the media, journalists, the fourth estate, should be completely independent. That for a healthy democracy journalists feel free to investigate and criticise politicians, public figures, lobby & special interest groups and big business without restriction or editorial restraint or other outside pressures whether implicit or overt.

I believe that this ideal is getting harder to uphold in the current environment- for example Paula Bennett's Press Secretary called a publication only last week to ask if story "could be made more Government-friendly" The request was turned down but you have to wonder how often these requests are made and how often they might be met with a more sympathetic hearing.

Furthermore one has to wonder how easy it might be for a corporate client with a large advertising account to apply these same pressures, whether overt or implied, to dissuade unfavourable coverage or use their leverage to have 'planted' positive stories, across what will be an integrated print, radio and online conglomerate.

Importantly, the applicants have an increasingly poor record when it comes to plurality and associated standards of fairness, balance and objectivity..

Newstalk ZB is the flagship of NZME'S enterprise, it is in most radio surveys New Zealand's most listened to station, it's combined Newstalk and Herald newsroom select and 'feed' the news to all parts of the country.

NZME sells Newstalk ZB as "News and entertainment", as "the people we can trust to inform us" Set aside the talk-back as we know by its nature this an ego and opinion-driven format.

What i'm concerned with, primarily in the Auckland market but from what I've heard also in NZME's Newstalk operations in the Christchurch and Wellington markets, are prime-time shows in the morning and afternoon 'drive' slots sold and promoted disingenuously as 'hard news and current affairs'

Instead what listeners are bombarded with is 12-15 hours per week from both Mike Hosking in the morning and Larry Williams in the afternoon of pure manipulation. Shows brimming with selective reporting, most often one-sided or giving such weight to one side of an argument as to create the illusion that the host's view is the only reasonable conclusion.

Opinion is fine but for the country's most listened to radio station to consistently and deliberately mislead their biggest audiences by blurring the line between fact and opinion is a great disservice to the public interest.

There is no equivalent of scale in the New Zealand media market on the other side of the political divide to counter the constant right-wing neo-liberal, pro-National narrative espoused by Mike Hosking, Larry Williams, Chris Lynch et al.

Anything which might offer an alternative to the hosts' somewhat skewed world-view is denounced as extreme left and all of these tactics have worked superbly to create New Zealand's largest echo chamber.

In recent times with previous movements in media ownership and with the New Zealand Herald coming under the auspices of it's NZME parent, there has been great co-operation & 'cross-pollination' between the radio arm Newstalk ZB and the print arm of the Herald. This has meant in addition to the platform afforded them by their radio shows, these hosts have also been given the opportunity to espouse their views and promote their agendas in New Zealand's largest circulation newspaper.

In addition the Herald appears to have weeded out some voices of dissent in it's editorial and opinion writing staff.

We have seen the Herald strongly criticised by the Press Council for running a front page story on a waitress who was repeatedly molested by the Prime Minister, after one of their reporters (an acquaintance of the PM) duped the subject of the article into participating in the piece under false pretenses.

The Herald also chose to run a front page featuring a somewhat flattering 'Biography' of the Prime Minister, written by one of it's political editorial staff, just weeks before the last election. A

move that might have been questioned in even the most obsequious quarters of a banana republic.

Finally, the Herald's political coverage seems to have moved from straight down the line, factual reporting to a blend of fact and opinion that obscures the line between and gives greater weight to the speculations of the correspondent.

I know the above probably goes off topic but i'm seeking to illustrate (and I could illustrate it with many more examples) the point that the media's ability to best serve the public interest is already in a precarious position and that the merger proposed by NZME and Fairfax will only give greater voice to those who already have disproportionate sway over political discourse and public opinion.

If allowed to go ahead i believe the merger would have a chilling effect on democracy and that the further reduction in media plurality will ultimately further erode public confidence in the industry itself.

I'm also aware that a large number of journalists are very concerned about the implications of the proposed merger but are unlikely to voice their opposition for fear of jeopardising current or future job prospects.

Neither Newstalk ZB nor the New Zealand Herald have covered themselves in glory of recent times when it comes to investigative journalism and hard-hitting questioning that looks to hold the Government to account. My great concern is that the larger combined corporate megalith would further put profits ahead of genuine quality journalism.

There is a strong likelihood that the larger merged entity would serve the interests of large corporate interests/advertisers and put preserving the corporate-friendly political status quo above any public interest that might be at odds with those objectives.

Yours sincerely

Matthew Edwards