To whom it may concern,

Please accept this as my submission to the Commerce Commission on its draft determination on the proposal to merge Fairfax NZ and NZME Ltd.

I am Fairfax NZ's Taranaki regional editor and I feel compelled to submit this following the release of your draft determination.

I was extremely disappointed to read the draft determination and there are points I feel I have to address.

I do understand your concern around plurality of voices. However, in Taranaki, we already operate in an area where competition is already minimal at best. I can assure you we run as an independent editorial voice for our region, despite already being part of a large media multi-national. There are no political or commercial considerations that impact the ability of my team to report the news from Taranaki as we see fit. We are encouraged to strive for quality journalism, using our local knowledge and news judgement to make daily editorial decisions on behalf of the company.

I saw no evidence to suggest any change to this environment under the proposed merger and I welcomed the proposal, mostly because of the other point I want to address, which is the commercial reality in which we operate.

The commitment by a commercial company to maintain a newsroom in the Taranaki region (up to 30 journalists, 20 of whom are 'my team', the remainder working for various other Fairfax departments), is reliant on the company remaining commercially viable and sustainable.

As I understand, the proposal to emerge the companies would significantly strengthen the commercial viability of the merged company, and therefore its ability and commitment to maintaining a strong newsroom in Taranaki.

I accept that part of that strengthening commercial viability may involve "rationalising" throughout the new company. In my now coming up to 10 years with Fairfax, there has been almost constant restructuring and streamlining and redundancies, but the team of front line journalists (reporters/visual journalists, not production staff) in our newsroom has remained at close to the levels they sat when I started. I would expect the rationalisations of the new company to continue in this vein.

Should the merger not be approved however, I expect that further cutbacks may be made sooner rather than later, and they would begin to impact directly and significantly on my team in Taranaki and in other regional and community newsrooms around New Zealand.

In my view this would be disastrous for the people of Taranaki and other regional communities. As journalist numbers reduced, the focus of the remaining journalists would by necessity shift to stories of 'national significance.' Fewer journalists on the ground would dramatically reduce the amount of community news covered, and the focus such coverage took.

Fewer people on the ground would also greatly reduce the ability of a team to scramble resources when a major news event happened. The best example of a Fairfax team in action was during the recent Kaikoura earthquake coverage and the sterling role played by the

Marlborough Express. Such a response is only possible by having a strong team of journalists on the ground and in the community.

The proposed merger would serve only to strengthen the ability of a new company to keep its resources in a region, while rejecting the proposal would only speed up the need for the further rationalisation that I expect would soon begin to impact my team.

The Taranaki Daily News has a long and proud history as the premier - and only major - source of local news in our community. What was once termed "the print media" is now in a highly challenged commercial environment. But at the heart of everything I do, I am committed to ensuring my news team retains its position in my community, continuing to tell its stories, and representing its people and their diverse opinions.

I strongly encourage the Commerce Commission to reconsider the position taken in the draft determination as a merged company would only serve to assist with that commitment. Continuing on the course indicated is likely, to seriously threaten, if not destroy, it.

At the end of the day, the plurality of voices you seek to protect will become endangered and possibly irrelevant if one, or both, of the major current voices is no longer a sustainable and viable commercial entity.

Ryan Evans

Fairfax NZ - Taranaki regional editor

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Taranaki regional editor