

**From:** [REDACTED]  
**To:** [info@futureofmediacommission.ie](mailto:info@futureofmediacommission.ie)  
**Subject:** Submission on behalf of Sport for Business  
**Date:** Friday 8 January 2021 14:44:40  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)

---

The Future of Media Commission was established by Government last year to look at the ways in which media is developing in an ever more fragmented world, and at how Government support should be directed to ensure we retain a strong independent media with quality journalism.

It is a big question in pretty much every aspect of our lives and never more so when we consider the impact of the kind of political upheaval we have seen to left and right, in geographic terms, over the last four years.

The idea of Fake News, the gradual erosion of respect for media, the control of communication being ever easier to secure without responsibility and at times, without transparency, through social media and the creation of our own bubble of like-minded thinking. All have contributed to a sense that we are being steered further away from independent thought, towards a world where we see what we think we want to see and no further.

In philosophical terms that tears away the very sense of change and original thinking that has guided our development at first slowly, and now at breakneck acceleration through the worlds of technology and medical science.

If we all think the same, or even if we allow ourselves to be corralled into ever narrower lines of experience and imagination, then the end game is difficult to see as a positive in any way, shape or form.

In the past year, we have seen the importance of Government in our lives, as a guide, enabler, decision-maker and creator of the way in which we conduct our day to day lives.

For some, that is a disaster but the reality in a democracy that works is that we do have the power to change direction and to question those making the decisions. Events in Washington over the past two months reached a low point on Wednesday night but the will of right-minded people, eventually, came through. That's right-minded in the 'will of the majority' perspective as opposed to one particular brand of political or economic thought.

As ever, and in a way we understand better than most in sport, it takes two sides to make a game, two sides to abide by a set of rules so that one can emerge as winner and preparations to begin again for the next round of engagement.

So if we accept the importance of those rules and adherence to them, as being for the common good, then how do we influence and direct our political 'servants of the people' to come up with the right rules.

Well, these things do not happen by chance and today we have an opportunity to state our case in the world of media and in particular from our perspective, how that relates in a sporting context.

Everyone can make their own submission, of a few words or a few pages, at the Future of Media Commission website, but the closing date is today.

We have made our submission, taking the template provided as a guide and making our case for a public service media that is supported by the public, backed by Government but with unfettered ability to question the way in which Government operates. We should all have a devil's advocate, to point out errors, rather than just cheer for the good decisions.

Ours is one voice but every chorus is made up of multiple voices, working in collaboration and, in the main, harmony. This is an opportunity to speak out and to listen.

### **Why are we making a submission?**

Sport for Business is a membership organisation consisting of sporting bodies, sponsors, media, agencies, Government departments, local authorities, state agencies and individuals.

We produce a Daily News Digest and host frequent events that tell the story of the collaboration between business and sport and how it can be of benefit to all.

Amongst our membership, we have media companies including RTÉ, Sky, TG4, Off The Ball, Independent News and Media, Joe.ie, Balls.ie, Pundit Arena and many more in production,

broadcast and consultancy.

We have built up a reputation for consistent commentary and understanding of the sporting media here and further afield and we feel as though we have an understanding of the questions being asked now by the Future of media Commission.

### **The Submission from Sport for Business**

#### **Question 1. How should Government develop and support the concept and role of public service media and what should its role in relation to public service content in the wider media be?**

The media is the fourth estate, alongside the other three arms of a working society, those of the Government of the day, the wider political community and the judiciary. Our role is to observe the political and social process and to ensure it is not exploited at the expense of our wider society.

It has to be supported financially and with that comes a necessary compromise, unless the funding comes from pure philanthropy. Commercial media has to sell itself to attract viewers or readers and advertisers. With increasingly large amounts of advertising spend directing towards online media from outside the traditional media channels, that means there is less to be spent on mainstream media and a corresponding drop in either standard or diversity.

Neither is palatable and so Government needs to step in, in the same way as it does in health or education, to provide a baseline of funding that allows for a functioning sector.

It should do so though without central control or political demands, other than to serve the public good. The money set aside for media should be determined by an independent body and paid over by Government on a rolling annual basis with an annual report on where it was spent, what it delivered and how that served the public good.

Consultations like this should be held annually after that report to allow for different voices to

have their say.

### **What can be learned from the evolution of public service media over the last decade?**

There is a danger of recency bias in raising the level of public engagement with the media over the past ten months but imagine if we had been reliant on what's app or Facebook for guiding us through the Covid-19 period.

It has highlighted though, if you choose to look, at how dominant those other areas had become.

In a sporting context, we have seen the fracture of media rights for minor and major competition take increasing hold. Leinster and Ulster will play in the Guinness PRO 14 rugby tournament tonight in front of an empty RDS, and as one of the major sporting events of the weekend, it will be seen only by those who have a subscription to one particular service and even then not if that service was previously channelled through one of the others.

That is a commercial decision taken by individual sports but if that was similarly applied to international matches, to Italia '90 from history, to Katie Taylor's Olympic Gold, then we would be a poorer nation in spirit.

Public Service Media has been on the ropes for the last decade. We 'all' watch the latest release on Netflix and talk about it in person and across social media but 'we' is very much defined by having enough to pay for a monthly description.

### **What systems may be required to support and sustain public service content, e.g. high quality, independent journalism, in an increasingly competitive and consolidated market?**

The model we have in Ireland is a mix where there is a requirement to have a License to consume public service media but also one in which that same media competes for

commercial spend.

The unfairness for commercial bodies is clear but the model need not be torn up to make it fair. Compliance with the license payment would allow for greater flexibility but non-compliance remains at a higher than acceptable level.

Public funding makes possible the kind of programming that would be too niche or too challenging in a commercial space and so is needed to ensure diversity.

There should probably be a portion of the gain from increased compliance going to competitive funding and pitching of ideas from different operators.

### **How might public service media be more effective in promoting the Irish language, sport and culture?**

As outlined above, it is the niche broadcasts that are the least attractive to commercial broadcasters, and the most important to preserve. We do not want a constant diet of US TV Drama, British Pop Music and Top flight European sport, none of which has a stamp of who we are as an independent people.

Our overall audience is small, half the size of London, so the gain to be made from content exclusively appealing to an Irish audience, may not be enough to make it worthwhile if we were to exist in a purely commercial world.

Rugby has survived being pushed to a very large extent behind a paywall but its demographic audience is more financially stable than would be the norm and were it not for the momentum of the national team on national free to air TV, would there be the same affection and extensive coverage in other areas of the media. It is not by accident that over 80 per cent of the IRFU's revenue stream depends on the National side rather than the provinces, a mix that has long been flipped in other sports where the club rather than the country has come to dominate.

### **How might public service media better respond to the needs and expectations of the public?**

A tricky question because the needs and expectations of the public can often be steered too much by what they are told they should like. The advance of Women's Sport was slowed for decades by the suggestion that people would not be interested. They weren't then given the stories and it toiled in the deep shadow on Men's sport. Sometimes it needs the media to step up, run counter to received wisdom and let the public decide.

### **What can we learn from other jurisdictions?**

It is more the danger that can be learned from. During the last FIFA Men's World Cup, we were on holiday in Portugal. The public service media is weaker there and they only showed the opening game, the ones involving Portugal and those involving Brazil. All the other games were on Pay TV. Are we comfortable with the idea that the biggest of events and the greatest of collective sporting engagements should be open only to those who can afford multiple subscriptions?

### **Question 2. How should public service media be financed sustainably?**

**What is the best model for future funding of public service media in Ireland? What approach best supports independent editorial oversight while achieving value for money and delivering on public service aims?**

As above the use of a license model works when there is full compliance.

The most efficient form of public service appears to be the Revenue Commissioners. It should be possible to have a 'Media License' as opposed to a TV license which is part of everyone's contribution either from tax or social welfare, paid on a monthly basis and arguably at a lower rate, perhaps in line with commercial streaming models. People would have an opportunity to opt-out but that itself would provide a more manageable way to check on those who may otherwise slip through the net.

It's the same as any other tax. Those who do not pay make it more expensive for those who do. We still have a strange disconnect between the idea of tax relating to service.

**What opportunities exist to develop and implement business model and organisational changes within the public service broadcasters (RTÉ and TG4)?**

We work closely with many different broadcasters and it generally comes down to people rather than processes. In terms of programme sponsorship, RTÉ is in a strong position with a functioning commercial department active in the market.

Many sporting rights are tied into tournament sponsorships which mean there is more certainty but less market force available to cover the cost of the broadcast. This could be an area of negotiation where subsidiary rights to online and other forms of content could be sold on the open market.

I would say it should be possible to explore the area of micropayments for certain streamed content, in the same manner as GAAGo and WatchLOI so as to open up the possibility of greater accessibility for sports that could then reach out to own sponsors to collaborate on widening the base of viewers.

**How might content commissioning, including by RTÉ, TG4 and the BAI Sound and Vision scheme, be adjusted/improved/reformed to better achieve public service aims?**

It seems like a closed shop for submissions and it may be that a wider understanding of what the schemes could deliver to sporting and wellbeing initiatives, would lead to a greater variety of programming ideas.

**How should public funding or tax reliefs be apportioned to Public Service Content providers?**

As above, the creation of funding without control is important. Transparent pitching for funding and reporting of results, backed up by wider public buy-in on consultation should be possible and would be desirable.

**What does the shift in advertising revenues towards big tech firms mean for the future of print, online and broadcast media?**

A smaller market of revenue in a small market is of great concern. The demands of the free market that people should be able to consume what they want falls down if the channels through which they are consuming lead them down narrower pathways, even if those pathways are determined by the individuals.

The greatest ideas come from where you look the least. Manned flight came about first from Orville and Wilbur Wright and their bicycle shop in Dayton, Ohio. If they were only interested in wheels on the ground, history might have been materially different.

**What role is there for alternative funding models for Public Service Content providers – voluntary, cooperative, crowdsourcing, subscription?**

Through streaming, there is an opportunity to experiment, to learn from the ideas that fail and



to implement new models that have been made possible by technology and connectedness.

**Question 3. How should media be governed and regulated?**

**What regulatory changes at EU or global level might impact on the governance of public service media in the period ahead?**

Big Tech is such an important part of the media and business environment that it will be dangerous in terms of how information is policed as opposed to utilised. Data controls such as those in GDPR have been accepted in the main, though roundly criticised when quirky exceptions arise.

Public awareness of how we can control our own privacy settings is essential, especially when convenience is the reward for being more relaxed about that.

**What challenges are posed to a vibrant, independent public service media by increasing consolidation / declining plurality of ownership in the Irish market?**

A strong public service media should be strong enough to both counter but also allow for, vested interests to control different sections. The editorial stance on politics taken by CNN and Fox Media is extreme compared to our own experience and living in one or other bubble might be equally dangerous to the common good.

Again, financial support without control, and operating on a philanthropic model will always deliver the best outcome.



A picture containing text Description automatically generated

