

# **REPORT ON OWNERSHIP AND CONTROL OF MEDIA BUSINESSES**

# IN IRELAND 2015-2017

#### Introduction

Section 28M (1) of the Competition and Consumer Protection Act 2014<sup>1</sup> ("the 2014 Act") requires the BAI to prepare a report (the "Report") that:

- i. describes the ownership and control arrangements for undertakings carrying on a media business in the State;
- ii. describes the changes to ownership and control arrangements of such undertakings over the past three years and
- iii. provides an analysis of the effects of such changes on plurality of the media in the State as defined in the 2014 Act.

The BAI must furnish the Report to the Minister for Communications, Climate Action and the Environment ("the Minister") who shall lay it before the Houses of the Oireachtas and publish it on the internet.

In accordance with this statutory requirement the BAI submits this Report on Ownership and Control of Media Businesses in Ireland 2015-2017 to the Minister for consideration. This is the second such iteration of the Report, following on and building on the "Report on Ownership and Control of Media Businesses in Ireland 2012-2014".<sup>2</sup>

Section 28M (4) of the 2014 Act also requires the BAI to carry out further periodic methodological research in relation to plurality and to publish the results of such research. The BAI, in partnership with the Reuters Institute for the Study of Journalism and with Dublin City University (DCU), has been involved in the development and publication of The Reuters Institute Digital News Reports (Ireland) on an annual basis since 2015. This research tracks the changing ecology of news consumption in Ireland and is part of a larger international study covering 36 countries. It remains the largest ongoing global comparative study of news consumption in the world and is the only cross media news consumption tracker available for Irish news and current affairs content. The

http://www.irishstatutebook.ie/eli/2014/act/29/enacted/en/html

- <sup>2</sup> BAI Report on Ownership and Control of Media Businesses in Ireland 2012-2014, https://www.dccae.gov.ie/en-
- ie/communications/publications/Documents/60/BAI%20%20Report%20Ownership%20Control%20Medi a%20Businesses%202012-2014.pdf

<sup>&</sup>lt;sup>1</sup> Competition and Consumer Protection Act 2014,



latest iteration of the report was published on  $22^{nd}$  June 2018 and has been used extensively to inform this Report.<sup>3</sup>

Pursuant to the BAI's Strategy Statement theme of "Promoting Diversity & Plurality", the BAI has committed to continuing to articulate an informed policy position on Media Plurality in Ireland that is supported by relevant research. The Reuters Institute survey is a key strategic deliverable in this context. Additionally, the BAI has adopted an Ownership and Control policy<sup>4</sup> to inform its decision-making functions in relation to changes of ownership and control in broadcasters. This policy is currently under review and a revised policy is expected to be published in 2019. In addition, the BAI is currently developing a Plurality Policy that will set out its overall approach in relation to this important statutory and regulatory objective. Both the BAI Plurality Policy and the revised BAI Ownership and Control Policy will be the subject of public consultations in Quarter 4 2018.

This Report is structured as follows:

Section 1	The Report Methodology
Section 2	The Research Findings
Section 3	Conclusion
Appendix One	Communications Chambers' Report on Ownership and Control of Media
	Businesses in Ireland 2015-2017

<sup>&</sup>lt;sup>3</sup> Reuters Institute Digital News Report (Ireland), <u>http://www.bai.ie/en/download/132964/</u>

<sup>&</sup>lt;sup>4</sup> BAI Ownership and Control Policy (2012), <u>http://www.bai.ie/en/download/128645/</u>



## 1. Report Methodology

The 2014 Act's definition of plurality encompasses "diversity of ownership" and "diversity of content", and provides a definition of a relevant "media business". The 2014 Act also provides relevant criteria for assessing the impact of a proposed media merger and the Minister has issued *Guidelines on Media Mergers*<sup>5</sup> which deal with how these criteria are implemented in practice. Consultants Communication Chambers (the "Consultants") were appointed by the BAI to undertake research (the "Research") to aid in the preparation of this Report, as they did similarly for the 2012-2014 Report. This Research is attached at Annex 1. The BAI has also drawn on its own experience in relation to plurality in the preparation of this Report, such as in the administration and approval of changes in the ownership and control structures of broadcasters as well as providing advice to the Minister in the context of the 2014 Act.

A key challenge during the development of the 2012-2014 Report was to define the scope of research to be carried out and to establish a methodology. In preparing this Report for the 2015-2017 period a similar research methodology was adopted. This has ensured that the findings of the 2012-2014 Report can be built on and comparisons more effectively drawn.

The scope of services covered by this Report therefore includes media businesses that publish newspapers (traditional and online); transmitters, re-transmitters or relayers of broadcasting services; providers of programmes consisting substantially of news and current affairs material to a broadcaster; and businesses providing online material consisting substantially of news and current affairs and which are under the editorial control of the provider. Under the 2014 Act, such undertakings must either have a physical presence in the State or, failing that, have made sales of at least €2m in Ireland within the previous year.

Focusing narrowly on changes in the ownership and control of media businesses that strictly meet the criteria provided for in the 2014 Act would not present a comprehensive picture of plurality. Such media businesses do not operate in isolation, and, in practice, operate in the same market and are influenced by undertakings that do not strictly meet the statutory criteria in the 2014 Act. A more comprehensive picture of the effect on plurality of changes in ownership and control can be achieved by looking at how these media businesses operate in the context of the wider market.

<sup>&</sup>lt;sup>5</sup> Finalised Guidelines on Media Mergers, <u>https://www.dccae.gov.ie/en-</u>

ie/communications/publications/Documents/59/Finalised%20Guidelines%20on%20Media%20Mergers.p



The Research notes that individuals synthesize their opinions from a variety of sources.<sup>6</sup> A wider perspective of plurality can therefore be obtained by looking at outlets of news and current affairs content from a so-called "cross media" perspective i.e. by looking at how different forms of media interact with one-another rather than, for example, viewing newspapers and television in isolation. The trust and influencing power of different kinds of media and brands also varies based on the individual.

Technological developments in how media is delivered to consumers are also relevant. This iteration of the Report focuses on the impact online intermediaries have on plurality in greater detail (within the limitations of the data currently available). This was warranted given the importance of such services as intermediaries (evident in the annual Reuters Digital News Reports (Ireland) over the period) and how this might have impacted plurality. While these intermediaries themselves did not appear to fall under the definition of media businesses under the 2014 Act between 2015 and 2017, given current trends in the audiovisual market it is foreseeable that this might be the case in later iterations of the Report.

Another key methodological development has been to undertake a wider consultation with various stakeholders. This was a useful exercise and valuable contributions from industry and civil-society were used to supplement the Research and have informed our findings in this Report.

It is important to note that the Act does not require the BAI to report on the *sufficiency* of plurality. This Report therefore makes comments on plurality and its measurements as well as factual findings on changes, but no conclusions on whether the starting point or end point of the review period represented a sufficient level of plurality.

In addition to identifying the relevant media businesses and providing a comment on their ownership, the Research provides a database of all scoped media businesses in the State; the ultimate owners of these media businesses by top 3 shareholders and an overall breakdown of entities owned by individuals and/or ultimate holding companies. This database is included in the Research and is also available as a searchable Excel spreadsheet as an information source for the Minister, the BAI and all other stakeholders.

<sup>&</sup>lt;sup>6</sup> Communication Chambers Report on Ownership and Control of Media Businesses in Ireland 2015-2017, Page 10 (the "Research"), attached at Annex I



## 2. Research Findings

Overall the Research concludes that there has not been a significant change in plurality due to changes in control in the 2015-2017 period. This is based on an analysis of consumption trends and a review of the relevant ownership and control changes that took place in the period under review.

## 2.1 Trends in Consumption

Whereas in the 2012-2014 period TV was the largest source of news content by audience, the Research indicates that online news is now the leading source. Radio follows TV in third place which is then followed by print media in fourth. However, the most popular sources of online news are those with traditional media holdings (RTÉ, INM/Communicorp and the Irish Times when viewed collectively account for over 50% of total online news consumption).<sup>7</sup> The most significant online only provider is the Journal.ie.<sup>8</sup>

RTÉ has retained its cross-media leadership position in TV and in radio for Irish news at the end of the 2015-2017 period and in terms of share of voice has almost doubled consumption rates of its online news and current affairs content since 2014.<sup>9</sup> Communicorp and INM, when viewed together,<sup>10</sup> continue to be the second largest player in terms of cross-media consumption, having significant shares in online, radio and national papers.

RTÉ retained its position as the most important Irish news source due to the importance given by the Research to TV as a source of news and current affairs content and RTÉ being the most trusted provider out of all media categories.<sup>11</sup> Consistent with the 2012-2014 period, TG4 was again not statistically material when analysing TV consumption of news and current affairs content, notwithstanding the instrumental role it played as a source of Irish language content and hence in terms of the "diversity of content" element of plurality. TV3 (now Virgin Media Television) was the second most important provider of television news and modestly grew its consumption from 2014. As in the 2012-2014 period, TV viewing in the 2015-2017 period fell overall.

Overall radio listenership has declined by a small amount in the 2015-2017 period. RTÉ leads in market share in radio, followed by Communicorp and the Wireless group. The market shares of

<sup>&</sup>lt;sup>7</sup> See table on Pages 3 and 39 of the Research,

<sup>&</sup>lt;sup>8</sup> DCU, Reuters Institute Digital News Report (Ireland) 2018

<sup>&</sup>lt;sup>9</sup> BAI Report on Ownership and Control of Media Businesses in Ireland 2012-2014

<sup>&</sup>lt;sup>10</sup> Mr. Denis O'Brien currently holds a controlling interest in Communicorp (100%) and a significant interest in INM (29%)

<sup>&</sup>lt;sup>11</sup> DCU, Reuters Institute Digital News Report (Ireland) 2018



radio stations have remained broadly consistent in the period with some exceptions. Podcasting consumption has also grown in the 2015-2017 period but remains niche.

Radio again remains a key source of news for audiences, particularly on a regional basis. As in the 2012-2014 period, when examining audiences in terms of radio groups, RTÉ is the lead player in radio news and current affairs but local commercial radio, when viewed in aggregate, performs well on a regional basis.<sup>12</sup>

Newstalk continues to provide national and international news to commercial radio stations on a wholesale, so-called "rip and read" basis or through the provision of bulletins for rebroadcast, especially in off-peak periods and at weekends. However, it remains the case that editorial responsibility rests with each individual station, and as a practical matter, stations make their own judgements about story selection, running order and the drawing on of additional sources in the broadcast of news in peak time.

International news is provided by Irish media but there is also a very strong presence of sources from abroad within the Irish market. The BBC again features highly as a source of news in traditional and digital sources.

The steady decline of print media circulation has continued in the 2015-2017 period.<sup>13</sup> The relative market share among the daily newspapers has remained broadly consistent in the period. INM titles' share of circulation has likewise remained broadly the same. The decline in print readership has been offset somewhat by an uptake in consumption of newspapers' online outlets.

In the 2015-2017 period online news became the largest source of news and current affairs content for Irish people. While leading brands that are traditionally "offline" such as RTÉ and the Independent have performed well, "digital native" brands such as the TheJournal.ie and BreakingNews.ie have significantly grown their share of consumption. New digital native market entrants such as Her.ie/Joe.ie have also performed well.

News is now being increasingly consumed through online intermediary services such as Facebook, Google News and Twitter. Usage has grown moderately in the 2015-2017 period, with 16% of respondents to the Reuters Institute Survey indicating that social media was their main source of news. Facebook is one of the main online sources for news content.<sup>14</sup>

<sup>&</sup>lt;sup>12</sup> Page 15, the Research

<sup>&</sup>lt;sup>13</sup> Pages 13-14, the Research

<sup>&</sup>lt;sup>14</sup> Page 17, the Research



The increased role of online intermediaries as a means to distribute news and current affairs content has had effects on the wider media market, with likely implications in terms of plurality. The Research notes that:<sup>15</sup>

- editors are reshaping their content to ensure it is distributed to a larger audience on intermediaries' services;
- the news "agenda" set by editors is gradually diminishing in importance;
- news stories on traditional media may be driven by social media;
- the news media is being disintermediated e.g. politicians are now using social media to speak directly to people, rather than through traditional news outlets;
- intermediaries facilitate multi-sourcing, which gives citizens exposure to multiple perspectives and the ability to cross-check sources (thereby, in the opinion of the Consultants, reducing the influence of any one source);

While the BAI agrees with the Research in terms of its findings that the above-mentioned factors are occurring, we remain cautious in this Report about drawing conclusions about their effect on plurality in the absence of further information, particularly in relation to how such services are used in practice by consumers. It is difficult to reach definitive conclusions for the 2015-2017 period on the implications of online intermediaries for how news and current affairs content is consumed and the related effects this has on plurality. Further information about how these services are used will be a focus for BAI supported research over the coming years.

#### 2.2 Ownership and Control Changes of Media Businesses

As outlined in the Research, fifteen mergers in the 2015 to 2017 period have been notified to the Minister in accordance with the 2014 Act. Thirteen of these were approved and completed as follows: <sup>16</sup>

- 1. Discovery Networks Asia-Pacific PTE acquired Setanta Sports Asia Limited. No key Irish media assets were acquired in the transaction.
- 2. Southbank Media, whose parent company Scripps provides channels such as HGTV and the Food Network, acquired N-Vision B.V. No key Irish media assets were acquired in the transaction.
- 3. Nikkei Inc. acquired the Financial Times Group and now controls the Financial Times newspaper.

<sup>&</sup>lt;sup>15</sup> Pages 17-19, the Research

<sup>&</sup>lt;sup>16</sup> A Full table is accessible at page 29-30 of the Research, attached at Annex I



- Virgin Media Limited acquired the TV3 Group, thereby leading to ownership of the TV3, TV3+1
  & 3E television channels (as they were then named).
- 5. Trinity Mirror Plc., owner of the Irish editions of the UK *Mirror* and *People*, acquired Local World Holdings Ltd. No key Irish media assets were acquired in the transaction.
- 6. ITV Broadcasting Ltd acquired UTV Ltd, thereby acquiring the UTV and UTV Ireland channels.
- Eircom Ltd. acquired Setanta Sports Channel Ireland Ltd and certain assets & business of Setanta Sports Hibernnia S.à.r.l, thereby leading to control of the Setanta Ireland and Setanta Sports 1 television channels and related sports broadcasting rights.
- 8. INM Ltd acquired Greer Publications, granting control of key Irish assets such as Ulster Business, Hospitality Review NI, Ulster Grocer and Northern Women.
- News Corp acquired Wireless Group plc, leading to control of six Irish radio stations: Q102, FM104, 96FM, C103, Live 95FM and LMFM.
- 10. Virgin Media Limited acquired UTV Ireland Ltd,, thereby gaining control of the UTV Ireland television channel (as it then was).
- 11. BBC Worldwide Americas and ITV SVOD Holdings acquired Britbox, a new joint venture. No key Irish media assets were acquired in the transaction.
- 12. The Color Company Limited acquired certain assets of Teilifis Mhaigh Eo Teoranta.
- Landmark Digital Limited, which owns interests in the *Irish Examiner*, 11 local papers and the radio stations WLR FM & Beat 102, acquired Benchwarmers Limited, gaining control of Benchwarmers.ie

Two transactions were approved but not completed:

- 1. Twenty-First Century Fox, Inc. was granted approval to acquire Sky plc. This would have given Twenty-First Century Fox control over a range of channels including Sky News.
- 2. Independent News and Media Holdings Limited (INM) was granted approval to acquire CMNL ltd, which would have granted control of 7 regional newspapers.

The Research concludes that the completed mergers did not have a material impact on plurality in the State and the BAI supports this conclusion. The BAI notes that the overall position in terms of the "share of voice" for the most influential media groups in the State has not been significantly altered by the above changes or other changes in the media landscape in the period under review. The basis for this is set out in Section 7 and Section 8 of the Research. The BAI also notes that the Research indicates that the overall impact of the listed mergers, in terms of individual or collective impact on plurality, does not appear to be materially different in the period under review from that envisaged when the approval was granted.



## Section 3 - Conclusion

This Report is the second produced in the context of the new 2014 Act and is a retrospective examination of the changes of control of media businesses in the state and their related effect on plurality. The BAI agrees with the conclusions of the Research that there has not been a significant change in plurality of media in the State over the period as a result of the relevant changes in ownership and control.



APPENDIX 1

Robert Kenny & Robin Foster

Ownership and control of media businesses in Ireland, 2015-17 26 September 2018



#### Disclaimer

The opinions offered in this report are purely those of the authors. They do not necessarily represent the views of the BAI, nor do they represent a corporate opinion of Communications Chambers.



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# **1. Executive Summary**

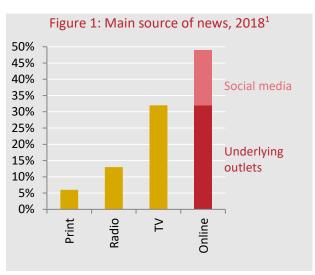
The Competition and Consumer Protection Act 2014 requires that the BAI provide every three years a report on the ownership of media businesses in Ireland, "changes to the ownership and control arrangements", and "the effects of such changes on plurality of the media". The Act says that "plurality of the media' includes both diversity of ownership and diversity of content". The focus is primarily on news provision, though cultural diversity is also relevant.

To address the Act's requirement for a report, this paper (commissioned by the BAI from Communications Chambers) undertakes a detailed investigation of ownership of Irish media businesses and also considers wider developments in the media market.

#### The media landscape

In line with other markets, Ireland has seen a steady fall in newspaper circulation (down at an average annual rate of 6.9% over the last three years).<sup>2</sup> This has been partially balanced by a growth in online consumption of newspaper sites, now at 44% of adults. Radio consumption has been broadly steady. Consumption of Irish TV news is down 9%.

According to the Reuters Institute survey, online is now the leading source of news in Ireland by some margin, with roughly half of people saying is their main source. (Figure 1)



This is a change from 2015, when roughly equal percentages said online or TV was their main source (41% and 37% respectively). Just 6% say that print newspapers or magazines are their main source (though this rises to 22% when their online editions are included). Within online, both traditional and non-traditional sources (such as Twitter, Facebook and Journal.ie) have grown in importance.

Looking at news providers within different media, RTÉ leads by a wide margin in TV (for Irish news), and also leads in radio. INM leads in print and amongst underlying providers online, and Communicorp has a strong position in radio. However, for the purposes of plurality a cross-media assessment is required, since in forming their opinions

<sup>&</sup>lt;sup>2</sup> ABC. Daily national titles. Excludes the UK Times, only recently tracked by ABC



<sup>&</sup>lt;sup>1</sup> YouGov survey for Reuters Institute, 2018. Note that this survey was conducted online, and therefore may somewhat overstate the importance of online sources

citizens synthesise news from various media. On this basis RTÉ's very strong position in TV, and the importance of TV overall, suggests that RTÉ has the largest 'share of voice' in the Irish news media landscape. It is followed by INM/Communicorp and then TV3.

Figure 2: Sector shares of selected media groups, 2017 <sup>3</sup>					
	Irish TV	Online		National	
	news	(excl SM)	Radio	Papers	
RTÉ	84.3%	14.7%	32.8%		
INM/Communicorp		31.0%	19.0%	43.8%	
TV3	15.3%	2.9%			
News Corporation		6.7%	12.5%	16.7%	
Journal Media		15.5%			
Irish Times		10.1%		15.3%	
Landmark Media		9.7%	2.8%	6.9%	
Other	0.4%	9.5%	33.0%	17.4%	
	100.0%	100.0%	100.0%	100.0%	

## Changes in media ownership and impact on plurality

This picture of the strength of different groups is not substantially different from that of 2014. However, there have been two significant changes of control of news providers which have strengthened acquirors:

- News Corporation's acquisition of the Wireless Group (with its portfolio of local radio stations)
- Virgin's acquisition of TV3 and UTV Ireland (renamed be3)

However, even allowing for the effect of these mergers, the acquirors are each still significantly behind RTÉ and INM in terms of share-of-voice.

In addition, the Irish Times announced its acquisition of Landmark Media in December 2017, though the transaction was completed in July 2018 and is thus strictly out of scope for this review. (Taking it into account, the combined group is of a scale with TV3).

Aside from these mergers, there have been several changes of control of outlets, particularly local newspapers and local radio. However, since these did not involve a consolidation of news, current affairs and/or cultural content, their impact on plurality of media in the state is not likely to be significant.

<sup>&</sup>lt;sup>3</sup> Sources per FN 77

There have also been a number of closures – TX FM and seven local newspapers. While not a result of changes in media ownership, these will have reduced plurality of local news in the relevant markets.

Finally there have been a range in shifts of consumption. For instance, TheJournal.ie has seen appreciable growth over the period, and now has the highest reach of any online news provider. This reflects the dynamic nature of the market.

#### Conclusion

Media mergers in the period have been subject to the new media merger regime, and thus were all subject to a ministerial finding that they would not be contrary to the public interest in plurality, based on best information and analysis at the time.

While some consolidation in news provision has occurred at the margin, at the end of 2017 consumers in Ireland could and did still access a broadly similar range of providers as three years prior, and the relative importance of the main news providers was little changed.

Based on the evidence set out in this report, we therefore conclude that there has not been a significant change in plurality of media in the State over the period as a result of changes ownership and control.



# 2. Introduction

The Competition and Consumer Protection Act 2014 ('the Act') specifies that:  $^{\rm 4}$ 

The Broadcasting Authority of Ireland shall, not later than one year from the date of the commencement of this section, and every 3 years thereafter, prepare a report which shall—

(a) describe the ownership and control arrangements for undertakings carrying on a media business in the State,

(b) describe the changes to the ownership and control arrangements of such undertakings over the previous 3 years, and

(c) analyse the effects of such changes on plurality of the media in the State

The first such report was prepared in 2015, covering the period 2012-2014.<sup>5</sup> To support the 2018 review for 2015-17, the BAI has commissioned this paper, which sets out ownership and how it has changed, and discusses the effect of these changes and wider market changes on plurality.

The first report established a methodology for meeting the Act's requirements, and we adopt the same approach for this paper. In particular, the BAI took the view that the plurality impact of changes of control (used as shorthand for 'changes of ownership and control arrangements') cannot be looked at in isolation. This was for several reasons:

- The scale of the media business in question matters. The acquisition of an obscure niche title by an existing major player might have little impact on plurality whereas the acquisition of a leading national newspaper clearly would
- Changes of control are not the only driver of changes in plurality. For instance, a major shift in share to an already large player could reduce plurality without any change in control
- Changes in cross-media patterns of consumption are important for plurality. For instance, the decline of print newspapers and the rise of online consumption are significant

<sup>&</sup>lt;sup>4</sup> §74 28M, Competition and Consumer Protection Act 2014

<sup>&</sup>lt;sup>5</sup> BAI, <u>Report on ownership and control of media businesses In Ireland 2012-2014</u>, 22 June 2016

Thus while this paper's main focus is the impact of changes of control, we will also address these wider issues.

There is one important change of context for this second review. The Act established a regime for Media Mergers, and in particular allows the Minister for Communications, Climate Action and Environment to block mergers that are believed to be contrary to the public interest in plurality.<sup>6</sup> The first review of plurality covered 2012-14, and thus predated the new regime. In the period of this report (2015-17) media mergers have all been notified to the Minister, and have been subject to review in accordance with Part 3A of the Act and under the statutory *Guidelines on Media Mergers*, issued by the Department of Communications, Energy and Natural Resources in June 2015.<sup>7</sup> (These Guidelines outline how the public interest test will be applied by the *Minister*).

Thus any mergers approved in this period were deemed - at the time - not to be contrary to the public interest. (See section 6 for a review of the operation of this regime in the period 2015-17.). This provides some comfort that the impact of changes of control on plurality may not be problematic.

However, there remains the possibility that the outcome of a change in control was very different from that anticipated at the time of the approval, or that the aggregate impact on plurality of all the transactions is more than the sum of the parts.

Note that this paper does not seek to assess the sufficiency of media plurality in Ireland – that is, whether there is enough diversity of ownership and content. Such an assessment is beyond the requirements of the Act, which (as noted above), calls for a review of changes of ownership and their impact on plurality, not a bottom-up assessment of the overall level of plurality.

The paper draws both on substantial desk research and on responses to a written consultation of stakeholders. We are grateful for the input of those parties who chose to make submissions.

<sup>&</sup>lt;sup>7</sup> DCENR, *Guidelines on Media Mergers*, June 2015



<sup>&</sup>lt;sup>6</sup> Details on the regime are available at DCCAE, <u>Media Mergers</u>

# 3. The concept of plurality

While many countries seek to protect plurality, there is little agreement as to how it should be defined, measured and secured. In this section we set out some of the key conceptual issues, and (where appropriate) how they are addressed in Irish statute and regulation. Key instruments in this context are the Competition and Consumer Protection Act 2014 and the associated *Media Merger Guidelines*.

# The focus of plurality

Generally, plurality has been seen as an antidote to any one media owner having too great an influence, particularly on political discourse. While many types of content can influence this discourse, news and current affairs are clearly particularly important. It is also hoped that plurality of news providers might support a wider range of opinions and perspectives on the news.

Thus many countries focus their plurality interventions on this genre. This may be implicit in the scope of regulations, such as limits on the ownership of newspapers but not magazines. Or it may crystallise in how more broadly drawn rules are implemented. In the UK, for example, the relevant statute does not specify a particular focus on news, but Ofcom has consistently focused its analysis on this genre.

## The statutory definition of plurality in Ireland

Ireland's Competition and Consumer Protection Act says:<sup>8</sup>

"'plurality of the media' includes both diversity of ownership and diversity of content"

These two forms of diversity are defined as follows:

"'diversity of content' means the extent to which the broad diversity of views (including diversity of views on news and current affairs) and diversity of cultural interests prevalent in Irish society is reflected through the activities of media businesses in the State including their editorial ethos, content and sources;

"'diversity of ownership' means the spread of ownership and control of media businesses in the State linked to the market share of those media businesses as measured by listenership, readership, reach or other appropriate measures;"

<sup>&</sup>lt;sup>8</sup> §74 28A (1), Competition and Consumer Protection Act 2014

Both forms of diversity are anchored on 'media businesses', which the Act defines as:

"the business (whether all or part of an undertaking's business) of—

- (a) the publication of newspapers or periodicals consisting substantially of news and comment on current affairs, including the publication of such newspapers or periodicals on the internet,
- (b) transmitting, re-transmitting or relaying a broadcasting service,
- (c) providing any programme material consisting substantially of news
- (d) making available on an electronic communications network any written, audio-visual or photographic material, consisting substantially of news and comment on current affairs, that is under the editorial control of the undertaking making available such material".

Except for transmission, each of these categories refers to news. Publishers (print or online) and broadcasters who do not provide news or current affairs may be outside the strict scope of plurality for the Act.

Thus the primary focus of interest in an assessment of plurality in Ireland should be news, though we note that diversity of content incorporates a reflection of the "diversity of cultural interests prevalent in Irish society". The *Guidelines* point in particular to the need to "have regard to any impact of the proposed merger on the Irish language".<sup>9</sup>

#### Categories of news

Within news it is also important to distinguish between local, national and international news. Plurality within each is useful, but is not a substitute for lack of plurality of the others. For instance, Ireland enjoys wide diversity of coverage of international affairs, including from international providers such as the BBC, Sky, CNN and so on. However, this does not obviate the need for plural coverage of Irish issues from an Irish perspective (which is arguably more important).

<sup>&</sup>lt;sup>9</sup> ¶5.4, DCENR, <u>Guidelines on Media Mergers</u>, June 2015

## **Types of plurality**

Plurality has a number of strands.

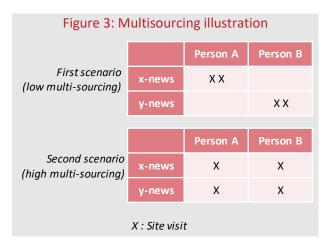
External plurality is plurality delivered by diverse ownership. Two outlets with different owners may be less likely to have the same editorial line or news agenda (though certainly different ownership is no guarantee of this). The *Guidelines* refer to a similar concept, 'external diversity', which it says "may be evident in the range of public, private and community media of various types in a particular locality or market".<sup>10</sup>

Internal plurality is diversity of perspective from within a given outlet. A newspaper may have both left- and right-wing columnists, for example. Internal plurality may be less secure than external plurality, in that the proprietor or simply a new editor might quell one perspective or the other, resulting in homogeneous output from that outlet. However in practice internal plurality does contribute meaningfully to overall plurality – many outlets offer diverse opinions within their service. Again, the *Guidelines* have a similar concept, 'Internal diversity', which "may be evident in, for example, the nature of particular media content and sourcing methods of media organisations".<sup>11</sup>

Plurality of consumption is the extent to which audiences are in practice exposed to multiple outlets and viewpoints. A market with many media outlets may nonetheless lack plurality if the vast majority of consumption is of a single provider.

An important aspect of plurality of consumption is multisourcing – the extent to which the average citizen consumes news from multiple outlets.<sup>12</sup>

This is a vital additional perspective to market share. Consider two scenarios. In the first scenario, person A visits website x-news.com twice per day, and person B visits website y-news.com twice per day. In the second scenario A and B each visit x-news.com and y-news.com once per day. The two scenarios are identical in volume of consumption and the market share of the two sites. However, the second scenario is more plural in that



<sup>&</sup>lt;sup>10</sup> ¶5.4, DCENR, *Guidelines on Media Mergers*, June 2015

<sup>&</sup>lt;sup>11</sup> Ibid

<sup>&</sup>lt;sup>12</sup> See page 15 for a discussion of levels of multisourcing in Ireland

each person is exposed to a diversity of views. There is less risk they will be 'spoon fed' a particular perspective by a site they are solely dependent on.

The practical relevance of this is that the internet has made a positive contribution to overall plurality by encouraging multisourcing. Several mechanism drive this:

- Online, additional traditional sources are readily available (for example, international titles)
- New online-only outlets (such as TheJournal.ie) are available
- Free news online encourages consumption from multiple sources (as opposed to purchasing a single print title)
- Social media prompts consumers to look at sources they might not have considered otherwise

As a result of such factors, the Reuters Institute Survey found that the average consumer of online news drew on 3.7 unique sources, whereas those not using online news drew on just 2.4.<sup>13</sup>

# **Cross-media plurality**

The value of plurality is in its ability to ensure an informed citizenry, and their exposure to a diversity of views. Different media do have distinct roles; may enjoy different levels of trust from citizens; and so on. However, an individual ultimately synthesises these inputs into a single perspective. Individuals do not divide their worldview up by media – the brain is not split into 'things I learned from TV' and 'things I learned from newspapers'. There is simply knowledge and opinion. If a citizen is exposed to a fallacious argument in a newspaper, it does not matter whether that argument is rebutted by another newspaper she reads or a TV programme she sees. What matters is that the argument has been rebutted.

Thus the principal perspective in a review of plurality should be crossmedia, rather than undue focus on (say) dominance of newspapers.

Such an approach is implicit in the Guidelines, which state:

"The more [media] sectors in which an individual or entity has a significant interest, the lower the threshold for it to be considered to have an adverse effect on plurality."<sup>14</sup>

In other words, individual media types should not be considered in isolation, but rather on a cross-media basis.

<sup>&</sup>lt;sup>13</sup> Communications Chambers analysis of YouGov survey for Reuters Institute, 2018. Unique source refers to (say) RTÉ, regardless of whether consumed via radio, TV or online. Sources have not been de-duplicated for common ownership <sup>14</sup> ¶5.2, DCENR, *Guidelines on Media Mergers*, June 2015

## **Measurement of plurality**

However, this creates a particular problem for the measurement of plurality. If plurality is to be considered across media, then ideally there would be a 'common currency' so that newspaper readership could be combined with TV viewing, web usage and so on.

However, the standard consumption metrics for these media are very different – circulation (or readership) for newspapers, versus hours of listening for radio, for instance. Further, the nature of the news products are different. For example, newspapers may include celebrity news, restaurant reviews, puzzles and so on, which have limited relevance for plurality.

Various metrics have been proposed as such a common currency, including 'time spent', 'outlet revenue' and 'share of references' (a measure derived from consumer research, based on how often consumers cite different outlets as being important news sources). None of these are entirely satisfactory, but 'share of references' seems most likely to correlate with influence (and a version of it was used in the previous three-year review).

The *Guidelines* note the importance of market share within media, and also the importance of a cross-media perspective, but do not mandate a particular approach to the cross-media assessment.<sup>15</sup>

A further complication is that different media operate under different regulations (as recognised by the Act and the *Guidelines*). For instance, Irish radio and television news must be impartial in news and current affairs coverage. Newspapers have no impartiality obligation (though most are signed up to a Code of Practice<sup>16</sup> which requires truth, accuracy, a distinction between fact and comment and so on). Some online outlets are effectively unregulated. Thus even if (say) a broadcaster and a newspaper were deemed to be equally influential, their flexibility to deploy that influence is rather different. A newspaper can advocate for a particular party in an election, for instance.

Finally, while the level of consumption of an outlet is clearly fundamental to its influence, there may also be indirect forms of influence at work. For example, one outlet may help set the news agenda for other outlets.

<sup>&</sup>lt;sup>15</sup> ¶5.2, DCENR, *Guidelines on Media Mergers*, June 2015

<sup>&</sup>lt;sup>16</sup> Press Council of Ireland, Code of Practice for Newspapers and Magazines – Handbook, January 2014

## 'Sufficient' plurality

If the measurement of plurality is challenging, so too is deciding how much is enough. There is no clear practice or benchmarks for sufficiency, unlike (for example) in competition law, where there are recognised thresholds for the Herfindahl-Hirschman Index which indicate insufficient competition.

Further, sufficient plurality may depend on the wider context. For instance, if social media is diminishing the power of traditional media (as we discuss in more detail later), then concentration of ownership of traditional media may be somewhat less concerning. For example, if politicians make substantial use of social media to speak directly to citizens, then traditional media's 'gatekeeper' role is diminished, and hence ownership of traditional media may be less critical.

There is also the question of how much plurality is 'affordable'. A highly plural market is also a highly fragmented one, which may create economic challenges for the news providers. For some types of news a highly plural market may simply not be viable. For example, a country may be able to support multiple providers of national and international news, but a particular town may struggle to support more than one local newspaper. In practice regulators have been willing to accept much lower levels of plurality for local news within individual markets than they have expected for national news.

Different countries have responded differently to these various challenges in determining sufficiency. Some have established 'bright line' tests. In France, majority ownership of a broadcaster with 8% viewing share is disallowed.<sup>17</sup> In Italy no entity can own more than 20% of the number of national TV channels, or have more than 20% of the revenues of the 'integrated communications system'. Such tests have the advantage of clarity, but inevitably they are somewhat blunt instruments.

Other markets have taken a more flexible (and perhaps ambiguous) approach. The UK's Communication Act cites as a public interest "the need, in relation to every different audience in the United Kingdom .... for there to be a sufficient plurality of persons with control of the media enterprises serving that audience". However, what this means in practice is left as a judgement for the Secretary of State.

The structure established by Ireland's Competition and Consumer Protection Act 2014 is closer to the UK discretionary approach, as opposed to France or Italy's 'bright line' approaches.

<sup>&</sup>lt;sup>17</sup> With an exception for France Télévision



# 4. Trends in news media consumption

In this section we consider trends in consumption of different news media; the share of different outlets within each medium; and the importance of different media to consumers as a source of news.

We focus on news both because (as set out above) we believe it to be the prime focus of Ireland's plurality regime, and because we believe there have not been material developments regarding cultural diversity as a result of mergers, nor have there been radical changes of output.

#### Newspapers

#### Print circulation and share

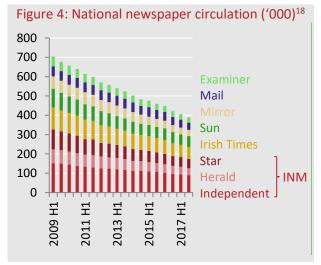
In common with other markets, Ireland has seen a steady and substantial decline in newspaper circulation<sup>19</sup>, at an average rate of 6.9% per year over the last three years. In that period, national daily circulation (including the *Herald*) has fallen from 483,000 to 390,000.<sup>20</sup> As a consequence, printed newspapers are of diminishing importance as a source of news. The DCU/Reuters Institute Survey found that those using print newspapers fell from 49% in 2015 to 35% in 2018.<sup>21</sup>

Market share amongst dailies has been

broadly steady over the period. The *Irish Sun* has been the biggest gainer over the last three years (up 2.3 percentage points) and the *Irish Daily Mirror* the biggest loser (down 1.4 pp). The *Irish Independent* has the highest share, at 23.1%. Overall INM titles (including the 50% owned *Star*) have a 44.9% share, down 0.8 pp over the last three years.

Sunday circulation is higher than daily, with a total of 568,000 copies distributed in H2 2017 (down from 713,000 three years earlier). On Sundays the *Sunday Independent* has a 31% share, followed by the *Sunday World* with 24%. Overall INM Has a share of 55% on Sundays, down 2.2 pp over the last three years, due in particular to declines at

<sup>19</sup> Note that absent an updated JNRS survey, we are unable to report on newspaper readership trends. However, circulation and readership trends are generally highly correlated, since readers-per-copy is usually quite stable
 <sup>20</sup> 2017 figure excludes the UK *Times*, only recently tracked by ABC. H2 2017 circulation for the Times was 10,000
 <sup>21</sup> Fig 22, DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018



<sup>&</sup>lt;sup>18</sup> NewsBrands Ireland/ABC

the *Sunday World*. By contrast, News Corp (via the Irish editions of the *Sun on Sunday* and *Sunday Times*) is up 2.8 pp to 22.8% share.

The above discussion addresses general interest papers. However, the *Irish Farmers Journal* has a weekly (Saturday) circulation of 61,000, which would rank it fifth amongst weekend newspapers.

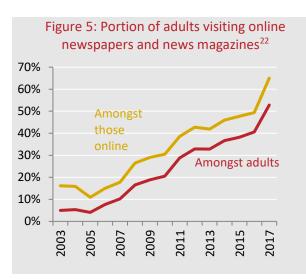
#### Online consumption of newspapers

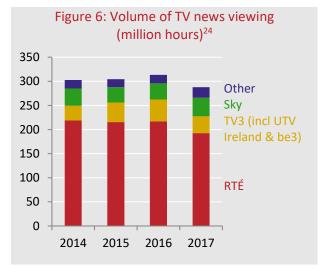
While print readership has been falling, this has been partially offset growing consumption of newspapers online. According to European Commission research, 53% of those aged 16-74 report visiting newspaper and news magazine websites. Usage is growing in part because of increased internet adoption, but it is also rising amongst those online, suggesting that growth will continue even as internet penetration reaches saturation. (Penetration now stands at 81% of individuals).<sup>23</sup>

## Television

After a period of decline, the volume of TV news consumption stabilised and even grew slightly through 2016. However, this may have been due to a set of one-off events, notably the launch of UTV Ireland in 2015 and the general election in 2016. Viewing fell back sharply in 2017 (Figure 6), and as a result is down 9% over the period.

Amongst the Irish channels, RTÉ continues to have a significant lead, with an 84% share of news viewing hours to this group in 2017.





<sup>&</sup>lt;sup>24</sup> Nielsen TAM, Communications Chambers analysis



<sup>&</sup>lt;sup>22</sup> EC, *Digital Agenda Scoreboard*. Figures are for those aged 16-74, and includes those downloading such titles

<sup>&</sup>lt;sup>23</sup> EC, *Digital Agenda Scoreboard*. Individuals who have used the internet in the last three months

#### **Radio & podcasts**

Radio listenership has seen a slight decline, with minutes per adult per day falling from 232 to 228 (2%) between 2014 and 2017.<sup>26</sup> That said, reach remains high, with 82% of adults listening to radio on a typical weekday.

This covers all radio. News will generally be within bulletins of a few minutes per hour, though with some longer programming on some stations.

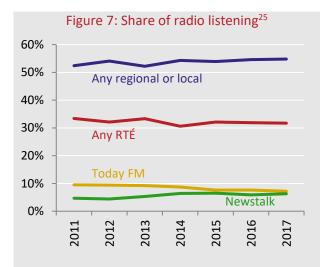
Market share has been broadly stable over this period, albeit with continuing losses for Today FM.

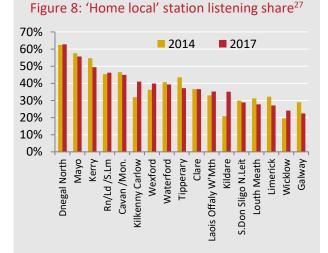
In each area it is generally the local commercial station which picks up the bulk of non-national listening (Figure 8). Overall they capture 40% of total listening (compared to 15% for all other local and regional). While there has been some local variation, this share has been stable since 2014.

Figure 9 shows the share of overall listening for the different groups of stations. RTÉ leads, followed by Communicorp and Wireless (owned by News Corporation). Communicorp has seen material loss of share, primarily due to the decline of Today FM.

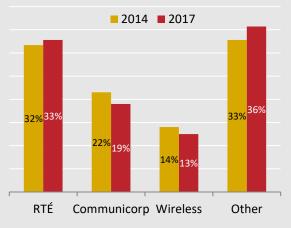
We note two caveats to these share figures. First, share of listening does not correspond directly to share of radio news consumption, not least because Communicorp's Newstalk will have news as a higher percentage of its output than most stations.

Second, Newstalk provides national and international news to all commercial radio stations on a wholesale basis.<sup>29</sup> News may be









<sup>&</sup>lt;sup>25</sup> JNLR reports for relevant calendar year. Listening from 7am to 7pm

<sup>&</sup>lt;sup>26</sup> Ibid

<sup>&</sup>lt;sup>27</sup> JNLR, Communications Chambers analysis

<sup>&</sup>lt;sup>28</sup> JNLR, Communications Chambers analysis. Figures are for Q4

<sup>&</sup>lt;sup>29</sup> Jack Power, <u>"Communicorp renews contract for local radio news bulletins"</u>, Irish Times, 11 May 2018

provided on a 'rip and read' basis (text prepared by Newstalk is read out by staff of the relevant station), or in the form of bulletins for rebroadcast. However, editorial responsibility remains with the station, and as a practical matter stations will make their own judgements about story selection, running order and so on. They may also draw on other sources in addition to Newstalk in preparing their own news programming.

While podcast consumption has been growing, it remains a niche activity. Only 12% of those online in Ireland had listened to a news or politics podcast in the last month.<sup>30</sup>

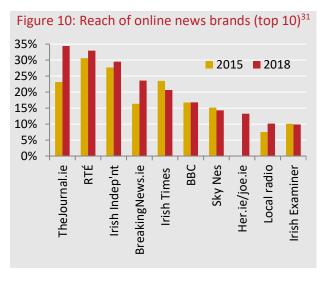
## **Online news**

#### Underlying news sources

Above we discussed online consumption of newspapers, but this is just part of online news consumption. Other traditional media (not least RTÉ) also provide news online. The internet also allows access to traditional news sources that previously would have been difficult to obtain, such as international newspapers and broadcasters. Finally, the internet has enabled completely new news providers, such as TheJournal.ie and BreakingNews.ie. News from all these sources may be consumed directly (via the outlet's website or app), or via intermediaries such as social media.

Figure 10 shows reported use of news brands online in Ireland, according to the 2018 Reuters Institute survey. Leading offline brands – notably RTÉ and the Independent – are strong. But so too are 'digital native' brands, such as TheJournal.ie and BreakingNews.ie. Moreover, these brands appear to be enjoying stronger growth online than traditional brands – TheJournal.ie has moved up from #4 to #1 over the period.

Compared to 2015, Yahoo! and the Mail have dropped out of the top 10, replaced by Her.ie/joe.ie and local radio.<sup>32</sup>



<sup>&</sup>lt;sup>32</sup> Setting aside Google News, which Reuters treated as an underlying source in 2015 but not 2018



<sup>&</sup>lt;sup>30</sup> DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018

<sup>&</sup>lt;sup>31</sup> YouGov surveys for DCU/Reuters Institute, Jan/Feb 2015 & 2018. Note that joe.ie/her.ie was not reported in the 2015 survey

In addition to the top 10 brands shown, there is a long tail of other brands used. Reuters found that a total of 29 brands had penetration of 3% or more.

#### **Online intermediaries**

Online audiences frequently consume news either on or via intermediaries such as Facebook, Google News and Twitter. Of respondents to the DCU/Reuters Institute Survey, 53% said they used social media for news, and 16% said it was their main source.<sup>33</sup> In both cases this was second only to TV. Further, 38% report using Facebook for news, a higher figure than for any other online source, and second only to RTÉ overall. However while usage of social media for news is important, it has grown only moderately over the period.<sup>34</sup>

Such intermediaries do not appear to be 'media businesses' for the purpose of the Act.<sup>35</sup> The relevant definition is an undertaking which makes "available on an electronic communications network any ... material, consisting substantially of news and comment on current affairs, that is under the editorial control of the undertaking making available such material". (Though we note that some argue that the design of algorithms to prioritise content and increasingly active vetting of content may constitute editorial control). As such, the ownership of these intermediaries is outside the statutory scope of this report. However, we believe the intermediaries are relevant to a consideration of news plurality, since they have had a number of effects which act to redistribute influence.

In particular:

• Editors are reshaping their content to meet the imperatives of distribution via intermediaries. According to Emily Bell and Taylor Owen of the Tow Center for Digital Journalism:

"Publishers are making micro-adjustments on every story to achieve a better fit or better performance on each social outlet. This inevitably changes the presentation and tone of the journalism itself. ... [T]the central role of audience strategists and social platform editors in deciding which stories are commissioned is increasing. One publisher said that

<sup>&</sup>lt;sup>35</sup> For the avoidance of doubt, this is not a legal opinion



<sup>&</sup>lt;sup>33</sup> YouGov survey for DCU/Reuters Institute, Jan/Feb 2018

<sup>&</sup>lt;sup>34</sup> Fig 32, DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018

if their audience team doesn't think a story will perform, it may not be assigned".<sup>36</sup>

The news agenda set by editors is gradually diminishing in importance. When a consumer sees news on Facebook (say) she does not see a slate of stories selected and prioritised by an editor. Instead she sees a set of stories that results from the outlets she follows; the items her friends have shared<sup>37</sup>; and the newsfeed selection and ordering generated by Facebook's algorithm. Thus news consumed via intermediaries is 'atomised', with individual stories each having their own delivery path to a particular user. According to Mediatique:

> "[D]iscoverability has been transformed by the role of social media in driving traffic directly to specific content rather than to branded home pages".<sup>38</sup>

The composition and prioritisation of stories consumed in this way will be very different from that imagined by an editor composing a front page or determining the running order of a bulletin. In effect, intermediaries provide and enable a multiplicity of news agendas, and this may dilute the power of the underlying news providers. In Emily Bell's view "news publishers have lost control over distribution".<sup>39</sup>

Indeed, 'algorithmic' news discovery (via social media, search or aggregators) is now the leading form online, with 47% of respondents to the DCU / Reuters Institute survey saying this was the main way they came across news, compared to 39% going direct to a news provider app or website.<sup>40</sup> (However, consumer understanding of the role of algorithms is still limited – just 28% of respondents correctly identified that Facebook news story choices were the result of 'computer analysis of what stories might interest you').<sup>41</sup>

 News stories on traditional media may be driven by social media. A tweet or Facebook post by a politician or a celebrity may be deemed newsworthy and reported more widely, or tweets may be used as a form of vox-pop, for example

<sup>&</sup>lt;sup>41</sup> Fig 13, DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018



<sup>&</sup>lt;sup>36</sup> Emily Bell & Taylor Owen [Tow Center for Digital Journalism]. <u>The platform press: How Silicon Valley reengineered</u> journalism, April 2017. Note that the paper primarily addresses US media

<sup>&</sup>lt;sup>37</sup> Per the DCU / Reuters Institute survey, 41% of Facebook users reported sharing or liking a news story in the past week

 <sup>&</sup>lt;sup>38</sup> Mediatique [for the BBC], <u>The provision and consumption of online news – current and future</u>, December 2014
 <sup>39</sup> Emily Bell, <u>"Facebook is eating the world"</u>, Columbia Journalism Review, 7 March 2016

<sup>&</sup>lt;sup>40</sup> YouGov survey for DCU/Reuters Institute, Jan/Feb 2018

- The news media is being disintermediated, with politicians (and others) speaking directly to consumers. Leo Vardakar has 170,000 followers on Twitter, and 36,000 on Facebook. This compares to the 90,000 circulation of the *Independent*. Donald Trump has said that Twitter is "like having your own newspaper".<sup>42</sup> If news media is being disintermediated, then this diminishes the influence that ownership of traditional news outlets brings.
- Intermediaries facilitate multisourcing (consumption of news from different sources, as discussed above). This gives citizens exposure to multiple perspectives and the ability to cross-check, thereby reducing the influence of any one source.

Thus while the intermediaries may not be 'media businesses' under the Act, they nonetheless are having impact on plurality, diminishing the power of news outlets and their owners.

However, the relationship between the intermediaries and outlets is complex and contentious, with debate over customer ownership, ownership of data, revenue splits, copyright, referral traffic, fake news and so on. It is a rapidly developing area, with constant changes of strategy by commercial players on both sides. For example, Facebook is reducing news items' share of Newsfeeds from 5% to 4%.<sup>43</sup>, There is also the possibility of (further) intervention by regulators and policy makers. As such, it is difficult to predict the future impact of the platforms on plurality.

#### Importance of different media for news

Next we consider the relative significance of different media for news, from the Irish consumer's perspective. We consider consumers' views of importance, and also at which sources consumers trust. (All else being equal, a trusted source is likely to have greater influence). Our sources are the Eurobarometer, DCU / Reuters Institute and Virgin Media surveys.

#### Eurobarometer

The Eurobarometer survey asks respondents where they "get most of your news on national political matters? Firstly? And then?". The 2017 survey found that TV continues to be the most important

<sup>&</sup>lt;sup>42</sup> Donald Trump, <u>Tweet</u>, 17 October 2012

<sup>&</sup>lt;sup>43</sup> Mark Zuckerberg, *Facebook post*, 19 January 2018

source, with almost half of consumers reporting it is their primary source, and 77% reporting that it one of the sources they use.

As a *primary* source, the internet<sup>45</sup> is now the second most important medium, with 22% citing it, compared to 18% for radio. However, a greater number say that radio is *one of* the sources they use for news (58% vs 43% for the internet).

The press is now the least used medium, both as a primary and secondary source – just 7% say it is their main source, down from 12% in 2014.

Note however that this doesn't necessarily imply that the influence of newspapers is

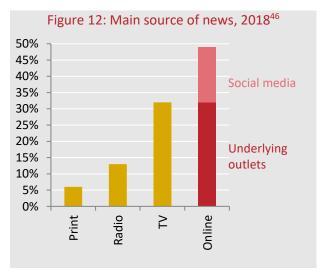
falling – a material part of the online consumption is of content from the newspapers.

Eurobarometer also asked about trust. Radio was the most trusted medium, with 71% saying they 'tend to trust' it, followed by 63% for TV. The written press stood at 50% and the internet at 34% (though it seems likely that specific sources online might be much more trusted than this average).

#### **Reuters Institute**

The Reuters Institute survey (conducted online) asked respondents which media was their *main source* of news. Forty-nine percent stated online was their main source, well ahead of television at 32%. Of the 49%, 17% said social media was their main source, with 32% citing underlying news providers online (such as RTÉ.ie).

Reuters' high share for online news contrasts with the Eurobarometer survey, which asked specifically about political news rather than (implicitly) general news. This contrast may

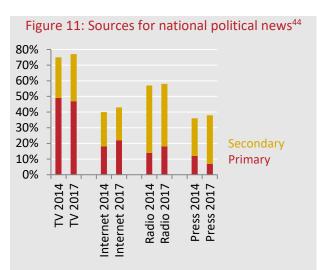


also in part be because the Reuters survey was conducted online, and so inherently excludes those with no access to the internet (16% of

<sup>45</sup> The survey asks respondents if they use 'websites' and 'online social networks', and these two responses are summed to give an internet figure. As a result, the survey may miss usage via apps

<sup>&</sup>lt;sup>46</sup> YouGov survey for Reuters Institute, 2018. Note that this survey was conducted online, and therefore may somewhat overstate the importance of online sources





<sup>&</sup>lt;sup>44</sup> EC, Standard Eurobarometer 88 Annex, December 2017. EC, Standard Eurobarometer 82 Tables of Results, 2014

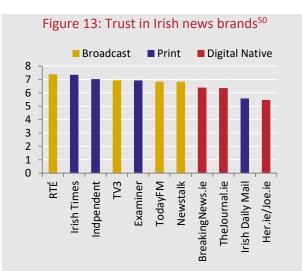
adults)<sup>47</sup>, and may also exclude less regular users (who may be less likely to be survey respondents). That said, Eurobarometer consistently reports lower figures for the importance of internet news consumption compared with other surveys, whether those were conducted online or not.<sup>48</sup>

Thirteen percent reported radio as their *main* source, but 45% have used radio in the last week, a notably high figure by international standards. The EU average is 36%, and in the US it is just 20%.<sup>49</sup>

Consistent with Eurobarometer, the Reuters Institute found print newspapers to be the least important of the four sources. However, 22% said that newspapers were most important when their online editions were included. This compares to 42% citing TV broadcasters (on TV or online).

Note that there are significant demographic variations within these overall averages. For example, of those age 55+, 58% say TV broadcasters are their most important source, and 27% cite online (compared to 49% overall).

DCU / Reuters Institute did not report trust by media, but did record levels of trust in different brands. This suggests that consumers draw sharp distinctions between different brands operating in the same medium (compare the *Irish Times* and the *Irish Daily Mail*, for instance). It also shows that digital native brands have not yet risen to the levels of trust enjoyed by premium traditional brands.



<sup>&</sup>lt;sup>50</sup> DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018



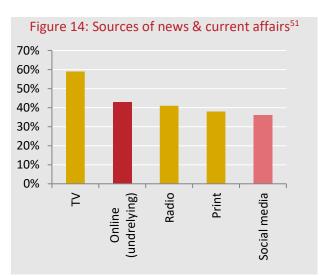
<sup>&</sup>lt;sup>47</sup> CSO, Statistical Yearbook of Ireland 2017

<sup>&</sup>lt;sup>48</sup> For instance, when compared to surveys reported in Crowe Horwath [for BAI], <u>Review of Funding for Public Service</u> <u>Broadcasters</u>, 23 May 2013, and Ofcom, <u>News Consumption in the UK: 2018</u>, 21 June 2018

<sup>&</sup>lt;sup>49</sup> DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018

#### Virgin Media

In 2016 Virgin Media surveyed Irish consumers on their digital habits, including which sources of news they used. As with the Reuters survey, this was an online survey and so will not be entirely nationally representative. Virgin found that TV was the most widely used source. However, it treated underlying news sources online and social media as distinct categories. If these were combined, it seems likely that internet news usages would be not far behind TV.



#### Conclusions

While the details of the surveys are different, on balance the evidence suggests:

- TV is a critical source for national news
- The internet is not far behind, and may now even be ahead (though it is not yet as widely trusted as other media)
- Radio is ranked third
- Print newspapers are now fourth, and are waning

## **Multisourcing**

Finally we consider multi-sourcing – the degree to which consumers each take news from multiple sources, ensuring exposure to diverse viewpoints. The Reuters Institute survey allows us to calculate the number of organisations from which the average person has seen news in the last week. For national and international news, the average was 4.8.<sup>52</sup> However, this figure includes a number of international outlets, such as the BBC and CNN, which might be expected to give less coverage to Irish national news. Focusing just on Irish outlets, the average person sees news from 3.5 organisations each week (excluding local newspapers).

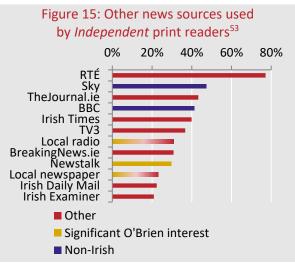
While changes in the Reuters survey mean that these figures can not be precisely compared to prior years, the equivalent figures for 2014 were 4.5 and 3.1, suggesting multisourcing is increasing.

<sup>&</sup>lt;sup>51</sup> Virgin Media, *Digital Insights Report 2016*, September 2016

<sup>&</sup>lt;sup>52</sup> Communications Chambers analysis of YouGov survey for DCU/Reuters Institute, 2018. For this purpose Newstalk and INM have been treated as a single entity, given Denis O'Brien's significant interest in both. For technical reasons related to the presentation of Reuters data, it is not possible to treat Today FM similarly, and it is excluded from our calculation

The Reuters Institute survey also allows an assessment of other sources seen by users of a given outlet. We take as an example readers of the *Irish Independent* in print (Figure 15). Almost 80% of *Independent* readers also consume news from RTÉ. Forty percent see the *Irish Times*, either in print or online.

In total, the average *Irish Independent* print reader sees news from 5 other news organisations. If we exclude organisations in which Denis O'Brien<sup>54</sup> also has a significant interest (such as Newstalk and local radio), the



average *Independent* print reader sees news from 4.7 other sources, of which 3.5 are Irish.<sup>55</sup>

<sup>&</sup>lt;sup>55</sup> Since Reuters does not provide a station or local newspaper level breakdown, we have simply assumed that 50% of each of these categories is associated with Communicorp and INM respectively



<sup>&</sup>lt;sup>53</sup> YouGov survey for DCU/Reuters Institute, 2018

<sup>&</sup>lt;sup>54</sup> Mr O'Brien owns 100% of Communicorp and 30% of INM, which in turn owns a range of newspapers including the *Independent* and *Herald* 

# 5. Approach to understanding ownership

The Competition and Consumer Protection Act 2014 requires this report to "describe the ownership and control arrangements for undertakings carrying on a media business in the State". This is defined as follows:

'carries on a media business in the State' means, in relation to a media business-

(a) having a physical presence in the State, including a registered office, subsidiary, branch, representative office or agency, and making sales to customers located in the State, or

(b) having made sales in the State of at least €2 million in the most recent financial year;

•••

'media business' means the business (whether all or part of an undertaking's business) of-

(a) the publication of newspapers or periodicals consisting substantially of news and comment on current affairs, including the publication of such newspapers or periodicals on the internet,

(b) transmitting, re-transmitting or relaying a broadcasting service,

(c) providing any programme material consisting substantially of news and comment on current affairs to a broadcasting service, or

(d) making available on an electronic communications network any written, audio-visual or photographic material, consisting substantially of news and comment on current affairs, that is under the editorial control of the undertaking making available such material;

## Scope

These definitions have a clear focus on news (and current affairs). With the exception of those transmitting, re-transmitting or relaying a broadcast service, all other types of media business carry a news qualification.

Notwithstanding the focus on news, the scope is nonetheless wide, in part because the €2m threshold only applies to those without a physical presence in the state. At its broadest, the definition could be taken to include every Irish blogger and local newsletter producer. However, identifying and determining ownership for all such entities would be a substantial undertaking. Moreover, we believe it would not be commensurate, given the relatively small contribution any such undertaking makes to overall media plurality. According to the DCU/Reuters Institute Survey, fewer than 7% of respondents said



they looked at any blog for news, and only 0.25% said they were their main source of news.<sup>56</sup>

We have therefore focused our efforts on:

- TV channels providing news
- Radio stations
- National and local newspapers
- Websites providing news, with at least 3% reach amongst those online<sup>57</sup>
- Entities providing transmission, re-transmission and relaying of broadcast services (hereafter 'transmitters')

Within the set of identified media businesses, there remains the question as to whether each passes the first, 'in the State' test. In most cases it is self-evident that an outlet (or more strictly the legal entity which owns it) passes the test – clearly Irish newspapers, radio stations and broadcasters will meet the 'physical presence' component.

However, for overseas entities providing news to Ireland, such as BuzzFeed, it is hard (outside a merger situation) to determine if they have a physical presence, and – if they do not – what level of revenue they accrue from Ireland. We have therefore erred on the side of inclusion – we have not excluded any of the media businesses in the categories above on the basis of the 'in the State' test. One consequence of this is that the list of media businesses we provide below may (in a small number of instances) include entities which do not in fact carry on a media business *in the State*.

#### **Identifying outlets**

In building the database of media businesses, we have started from media outlets – individual newspapers, channels and so on. For the current exercise we built on the outlets identified for the 2012-2014 report, but updated it and increased coverage of smaller local papers. Our sources included annual reports of media groups, the Press Council, MediaLive, NewsBrands Ireland, BAI licensed broadcasters and the Reuters Institute. This enabled us to identify 192 media outlets serving Ireland. This list is not necessarily exhaustive, but certainly includes the great majority of outlets of each type, and the largest of each type.

<sup>&</sup>lt;sup>56</sup> YouGov survey for DCU/Reuters Institute, 2018

<sup>&</sup>lt;sup>57</sup> Per YouGov survey for DCU/Reuters Institute, 2018

#### **Identifying owners**

From the list of media outlets, we then sought to identify the legal owner of each outlet. This was not always a trivial exercise, particularly when identifying historic ownership. Sources included outlet websites (including archived versions via the Wayback Machine), website registration records, the CCPC, press reports, press releases, and so on. Not all these sources were definitive, and we came across a small number of conflicts. Where appropriate we used our judgement.

The result was a set of 117 media businesses which do (or, in 2014, did) directly own a media outlet. However, this is still not a complete set of media businesses. If a newspaper is owned by XYZ Ltd, and XYZ Ltd is in turn owned by ABC Ltd, then both XYZ and ABC are media businesses under the Act (as will be ABC's parent, if the corporate chain continues upwards).

As a practical matter, it is the ultimate holding company that is of most interest. If XYZ is fully controlled by ABC, then its existence has minimal impact on plurality. It is ABC (and the other media outlets it may control) which is the relevant focus for discussions of plurality.

In order to identify these holding companies (and other shareholders), we again relied on a variety of sources. B1s were the most important. Irish limited companies must file an annual B1 form, setting out their shareholders. We used the forms filed closest to end-2014 and end-2017.

However, even for Irish entities the B1s were not comprehensive. In some cases companies were not up-to-date with their filings, or filed data that appeared to inaccurate. In a small number of instances, a company's shareholders were so numerous that they had been filed on a CD rather than via a form, and so were not readily accessible via the CRO.

For non-Irish entities (notably UK and the Channel Islands) we used the local equivalent filings, where available. We also made use of public accounts of holding companies, which in some jurisdictions list ownership of subsidiaries. On occasion we made use of reliable press sources.

For each entity we considered, we captured the three largest shareholders, on the basis that a fourth-largest shareholder was unlikely to have much ability to influence the output of the organisation in question. For many entities, the top three shareholders represented 100% of the share capital. However, there



were two main categories of exception – public companies (which may have thousands of shareholders) and radio stations, for which corporate structures are often complex and shareholding diffuse.

Most companies had a single class of shares, so that shareholders' share of voting rights was the same as their share of ownership. (Since we are interested in control of media businesses, it is voting rights that are most important to our exercise).

Some entities had more than one class of share, raising the possibility that voting rights were not pro-rata to ownership. Where information on different voting rights for different share classes was readily available, we calculated voting shares for different owners. (One example is Twenty-First Century Fox, where the majority of the public float is non-voting Class A shares. Class B shares, which *do* have voting rights, are owned roughly 39% by the Murdoch Family Trust.). Absent information on different voting rights, we assumed different classes of shares had equivalent rights.<sup>58</sup>

An additional challenge in determining control from shareholdings is that some entities may be controlled by family groups, where not all family members share a surname, and hence are not readily identifiable from the share register. Where we are aware from other sources (particularly press reports) that there is family control, we have noted this.

<sup>&</sup>lt;sup>58</sup> Note that there are various reasons to have different classes of shares apart from different voting rights. For example, a particular class may have priority to receive funds in the event of a liquidation or sale of the business



# 6. Operation of the ownership regime, 2015-2017

#### **Results of merger reviews**

For most of the period covered by this review, media mergers have been subject to the regime set out by the Act and the *Guidelines on Media Mergers*. Fifteen mergers have been notified. Of these:

- Thirteen were approved and completed;
- One (Twenty-first Century Fox's acquisition of Sky) was approved but is still pending; and
- One (INM's proposed acquisition of CNML) was recommended for approval by the BAI subject to certain conditions, but did not complete as a result of INM withdrawing its offer

Details of notified mergers are shown overleaf.

When notified of a media merger, the Minister for Communications, Climate Action and Environment has the discretion to approve it after an initial analysis (a Phase 1 Review), or to refer it to the BAI for more detailed analysis (a Phase 2 Review) before making his final decision. Only the INM/CNML transaction was subject to a Phase 2 Review.

This reflects the reality that many of the mergers were evidently not going to have a material impact on plurality in the State. Indeed, for six of the mergers, only one party had media operations in Ireland.

In addition to review under the media merger guidelines, mergers involving licensed broadcast services may be considered under the BAI's Ownership and Control Policy<sup>59</sup> (as a distinct process from any BAI Phase 2 review). However, in the period under consideration, no merger has been blocked or had conditions applied under this policy.

<sup>&</sup>lt;sup>59</sup> BAI, <u>Ownership and Control Policy 2012</u>, 26 April 2012



### Notified media mergers, 2015-17

Merger	Acquirer	Acquirer's key Irish media assets	Target	Target's key Irish media assets	Notification	Determination	Review phases	Outcome
2015-01	Discovery Networks Asia- Pacific Pte	Parent co (Discovery) provides channels such as Eurosport, Animal Planet etc	Setanta Sports Asia Limited	[None in the State]	26-Mar-15	12-May-15	1	Approved
2015-02	Southbank Media	Parent co (Scripps) provides channels such as HGTV and Food Network and has stake in UKTV	N-Vision B.V	[None in the State]	15-May-15	25-Jun-15	1	Approved
2015-03	Nikkei Inc.	[None in the State]	Financial Times Group	Financial Times	02-Oct-15	05-Nov-15	1	Approved
2015-04	Virgin Media Limited	Virgin Media cable network. In addition John Malone is a significant indirect shareholder of both Virgin and Discovery	TV3 Group	TV3, TV3+1 & 3e	12-Oct-15	30-Nov-15	1	Approved
2015-05	Trinity Mirror Plc.	Irish editions of the UK Mirror and People	Local World Holdings Ltd	[None in the State]	09-Dec-15	24-Jan-16	1	Approved
2016-01	ITV Broadcasting Ltd	ITV channels	UTV Ltd	UTV Ireland and Northern Ireland channels	13-Jan-15	18-Feb-16	1	Approved
2016-02	eircom Ltd.	eir Vision and telecoms network	Setanta Sports Channel Ireland Ltd, certain assets & business of Setanta Sports Hibernia S.à.r.l	Setanta Ireland, Setanta Sports 1 and assorted sports broadcasting rights	09-Feb-16	24-Feb-16	1	Approved
2016-03	INM Ltd	Member of INM Group, which operates 17 newspapers in the State, including the <i>Irish</i> <i>Independent</i>	Greer Publications	Ulster Business, Hospitality Review NI, Ulster Grocer & Northern Woman	08-Apr-16	24-May-16	1	Approved
2016-04	News Corp	Irish editions of UK <i>Times &amp; Sun</i> . In addition the Murdoch Family Trust holds a 39% stake in both News Corp and 21CF (which in turn holds 39% of Sky, which operates Sky News and other channels)	Wireless Group plc	Six radio stations: Q102, FM104, 96FM, C103, Live 95FM and LMFM.	05-Aug-16	22-Sep-16	1	Approved
2016-05	Virgin Media Limited	Virgin Media cable network and TV3 channels. In addition John Malone is a significant indirect shareholder of both Virgin and Discovery	UTV Ireland Ltd	UTV Ireland	21-Sep-16	15-Nov-16	1	Approved



Merger	Acquirer	Acquirer's key Irish media assets	Target	Target's key Irish media assets	Notification	Determination	Review phases	Outcome
2016-06	Independent News and Media Holdings Limited	Member of INM Group, which operates 17 newspapers in the State, including the Irish Independent	CMNL Ltd	7 regional newspapers	21-Nov-16	[Transaction terminated prior to Minister's decision]	1&2	BAI recommended conditional approval, but transaction did not proceed
2017-01	BBC Worldwide Americas and ITV SVOD Holdings	BBC and ITV channels	Britbox, a new JV to be established by the parties	[None in the State]	30-Jan-17	14-Mar-17	1	Approved
2017-02	The Color Company Limited	[None in the State]	Certain assets of Teilifís Mhaigh Eo Teoranta	Irish TV channel	22-Mar-17	25-Apr-17	1	Approved
2017-03	Twenty-First Century Fox, Inc.	Broadcast channels including FOX, National Geographic and YourTV. In addition the Murdoch Family Trust holds a 39% stake in both 21CF and News Corp (which owns the Wireless Group, and the UK Sun and Times)	Sky plc	Range of channels including Sky News. The Sky DTH platform	10-Apr-17	23-Jun-17	1	Approved, but transaction pending
2017-04	Landmark Digital Limited	Irish Examiner and 11 local papers. Radio stations WLR FM & Beat 102	Benchwarmers Limited	Benchwarmers.ie	15-May-17	16-Jun-17	1	Approved

Notes: Information on common shareholdings provided purely for reference Asset lists are not exhaustive, and are summaries of those held at the time of the notification Online assets ancillary to those shown, or aimed at other countries, have not been listed



# Significance of approval in the context of the plurality review

The Minister grants approval if he or she is of the opinion that "the result of the media merger will not be contrary to the public interest in protecting plurality of the media in the State". Note that this is not the same as an opinion that the merger will not reduce plurality. For example, a merger may reduce plurality, but be approved on the basis that even after the merger plurality would be ample.

Further, like most discretionary regulatory or policy decisions, the Minister's decision to approve a merger is necessarily based on a forward-looking view – what is likely to be the outcome of approval? As with any forward-looking view, the outcome may be different from that anticipated. A merger that was expected to have limited impact on plurality might turn out to be more significant. For example, a merger of two small outlets might – retrospectively – come to be seen as more significant if both outlets grew substantially and consequently, as a combined entity, were a threat to plurality.

For these reasons, it does not seem right to assume – simply because all media mergers in the period in question have been approved – that there has been no change in plurality as a result of any one of those mergers. By extension, it is certainly not right to assume that there has been no *aggregate* impact on plurality as a result of the combination of mergers

Such assumptions would obviate the need for the periodic reviews required by the Act. However, in contrast the Ministerial reviews of individual transactions, the periodic reviews are retrospective (thus with the benefit of hindsight) rather than prospective; and aggregated rather than transaction-specific.

However, for the avoidance of doubt, the fact that a hypothetical merger had turned out to be more threatening to plurality than anticipated at the time of the Minister's review would not provide justification for a retrospective reversal of the initial approval, and no such mechanism exists in the Act.

Further, situations where the outcome is materially different from that anticipated are likely to be exceptional, and we do not believe such a situation has arisen for the mergers in the period under review.

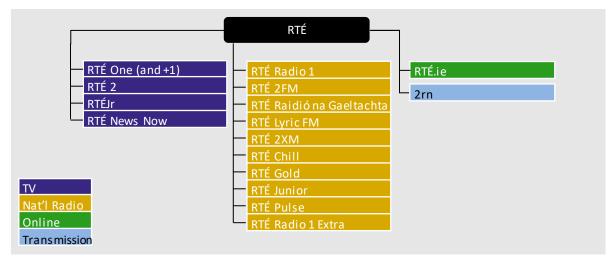


# 7. Ownership of media groups

Our findings regarding ownership are set out in detail in the Appendix (see page 44 onwards). However we here focus on the structure and outlets of a number of the larger media groups, and changes since 2014. We also consider changes to ownership more generally.

Note that in the following diagrams, for simplicity we omit:

- Some outlets that are part of media businesses, but which are not significant news providers (and are thus not media businesses in their own right) or which do not make an obvious contribution to cultural diversity (in particular the Irish language)
- Outlets with immaterial consumption in Ireland
- Some 100% owned intermediary holding companies



#### RTÉ

RTÉ has a substantial presence across TV, radio and online.

Its channels capture approximately two-thirds of TV news viewing and 84% of Irish news viewing (down 3 percentage points over the period). Its radio stations have been steady at just over 30% of listening (though potentially a lower share of *news* listening).<sup>60</sup> RTÉ.ie is the #2 online news site by reach (after TheJournal.ie), used by onethird of those online.<sup>61</sup> The ownership and news outlets of RTÉ are unchanged since 2014.

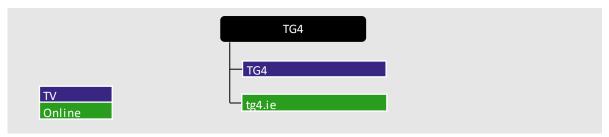
60 JNLR Q4 2014

<sup>61</sup> Fig 50, DCU, Reuters Institute Digital News Report (Ireland) 2018, June 2018

RTÉ's channels and stations also make a significant contribution to cultural diversity, through the provision of programming made in Ireland, including Irish language content.

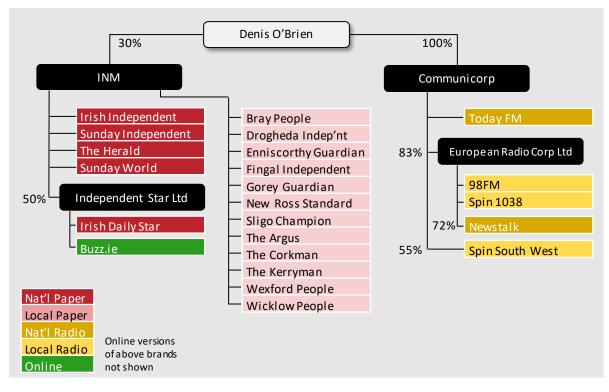
RTÉ also owns a transmission business, 2rn, which provides DTT distribution for its own and other channels and radio broadcast services.

#### TG4



TG4 has a relatively small presence in news, with just 0.4% of TV news consumption.<sup>62</sup> That said, it has particular importance as a news provider to native-Irish speakers, and contributes to cultural diversity and the need to support the Irish language.





<sup>&</sup>lt;sup>62</sup> Nielsen TAM, Communications Chambers analysis

Denis O'Brien has significant interest<sup>63</sup> in two entities, Independent News & Media [INM] (29.9%) and Communicorp (100%), in each case unchanged over the period. INM is major national newspaper owner, owning the *Irish Independent* (the most widely read title), the *Herald*, their Sunday titles, and half of the *Star* (co-owned with Express Newspapers). As of H2 2017 the daily titles have a 45% share of national circulation, down slightly from 46% three years previously.<sup>64</sup> However, in absolute terms the circulation of INM's daily titles is down by a fifth in this period.

INM also holds 12 local titles. (It no longer controls the *Carlow People*, which is now part of Informed Voice Media).

INM's traditional outlets also operate websites. The Independent online has the third highest reach of any online news site, at 30% (slightly ahead of its 28% reach in 2015).<sup>65</sup> In the period INM also launched one standalone website, buzz.ie, which (like the *Star*) is co-owned with Express Newspapers

Communicorp controls a significant portfolio of radio stations, including the two national stations Newstalk and Today FM. At the beginning of the period Communicorp also had a minority stake in TX FM 105.2 (Dublin Rock Radio Ltd), but this closed in 2016. The Communicorp stations captured 19% share of listening in 2017, down from 21% in 2014.<sup>66</sup> Its share of news listening is likely higher, since Newstalk (6% share) has a much higher concentration of news than other stations. Newstalk is also a provider of wholesale news services to all other commercial radio stations

65 Fig 50, DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018

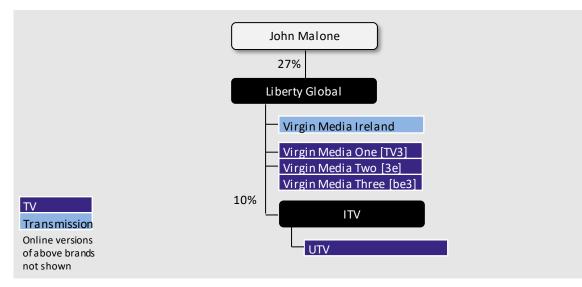
<sup>&</sup>lt;sup>66</sup> Communications Chambers analysis of data from JNLR. Q4 for each year



<sup>&</sup>lt;sup>63</sup> The DCCAE <u>Guidelines on Media Mergers</u> state that "A holding or voting strength of more than 20% or more of the voting power (directly or indirectly) will generally constitute a significant interest." In the context of the Phase One review of the INM/CMNL transaction, the DCCAE took the view that Mr O'Brien's holding in INM was indeed a significant interest. DCAEE, <u>CMNL Limited & Independent News and Media Holdings Limited - Phase One Examination Review</u>, 4 Jannuary 2017

<sup>&</sup>lt;sup>64</sup> ABC

#### **Liberty Global**



Liberty Global is the parent of Virgin Media Ireland. Virgin acquired TV3 from private equity group Doughty Hanson in 2015. Since Virgin did not operate other news outlets, this did not represent a consolidation of news provision in Ireland. However in 2016 Virgin further acquired UTV Ireland, which it rebranded be3. (A further rebrand followed in August 2018, when the TV3 stations became Virgin Media One, Two and Three).

At the time UTV Ireland's acquisition, its TV news viewing share was 3%.<sup>67</sup> In 2017 TV3 and be3 had an aggregate share of Irish news viewing of 15%.

Regarding cultural content, Virgin Media One and Two operate under a programme policy statement agreed with the BAI. This discusses news provision, levels of original Irish programming, Irish language content and so on. The policy statement was unaffected by the change of ownership of TV3. (In 2017 more than 50% of the TV3 channel's schedule was produced in Ireland, compared to a licence requirement of 25%).<sup>68</sup> Virgin Media Three operates under a licence agreed with the BAI in 2014.

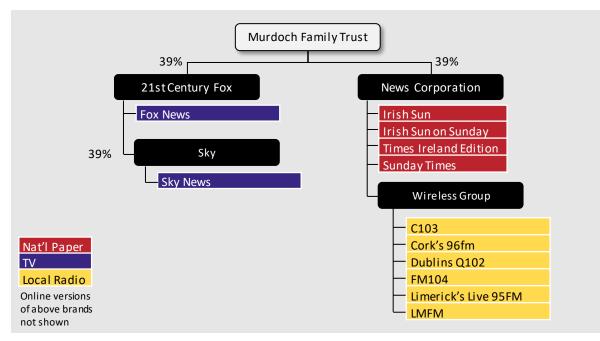
Liberty Global also has a 10% stake in ITV plc, which has a portfolio of channels available in the State, though most do not carry news. UTV (acquired by ITV in 2016) offers UK and Northern Irish news, but is not available on the main platforms in the State. It is however available via Freeview on a 'spillover' basis in border regions.

<sup>&</sup>lt;sup>68</sup> <u>TV3 evidence to a Meeting of Joint Committee on Communications, Climate Action</u> <u>and Environment</u>, 3 October 2017



<sup>&</sup>lt;sup>67</sup> Communications Chambers analysis of data from Nielsen/TAM

#### **Murdoch Family Trust**



The Murdoch Family Trust owns approximately 39% of two public companies with media outlets in Ireland  $-21^{st}$  Century Fox (21CF) and News Corporation.

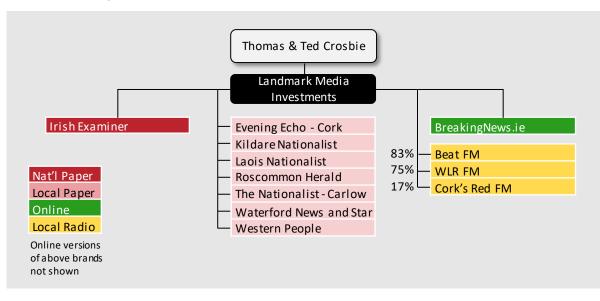
21CF operates Fox News, and also has a 39% holding in Sky plc (and hence Sky News). These channels offer international rather than Irish news. 21CF has bid for the remaining shares of Sky it does not own, but at time of writing this transaction has not completed.

News Corporation owns the UK *Times* and *Irish Sun*. The *Times* launched Irish digital and print editions in 2015 and 2017 respectively. The *Sun* and *Times* have an Irish daily circulation share of 17%.<sup>69</sup> In 2016 News acquired Wireless Group, which operates six local radio stations in the State (as well as a number of stations in the UK). These six stations have an aggregate listening share of 12%.<sup>70</sup> Wireless Group was previously named UTV Media plc, but changed its name on selling its TV assets to ITV.

<sup>69</sup> ABC

<sup>&</sup>lt;sup>70</sup> Communications Chambers analysis of data from JNLR.

#### **Crosbie Family**



At end 2017, Thomas and Ted Crosbie controlled 100% of Landmark Media Investments (via Rinvery Ltd). Landmark owned a portfolio including the *Irish Examiner*, a range of local newspapers, BreakingNews.ie and controlling stakes in Beat FM and WLR FM. Previously Landmark operated the *Enniscorthy Echo*, the *Wexford Echo*, the *Gorey Echo*, and the *New Ross Echo*, but these were closed in June 2017.

The *Examiner* has a 7% share of daily circulation.<sup>71</sup> BreakingsNews has a 24% reach amongst those online.<sup>72</sup> The two radio stations have an aggregate share of listening of 3%.<sup>73</sup>

However, in the period after that under review, the Crosbie family have exited the media business. In December 2017 Landmark reached an agreement with The Irish Times DAC to sell its media assets. This media merger was approved by the Minister for Communications, Climate Action and Environment on 15 June 2018 and completed in July 2018. <sup>74</sup> The merger brings together the above assets with the *Irish Times*, giving with The Irish Times DAC (for example) a share of daily newspaper circulation of 23%, roughly on a par with the *Irish Independent*.<sup>75</sup>

<sup>&</sup>lt;sup>75</sup> ABC



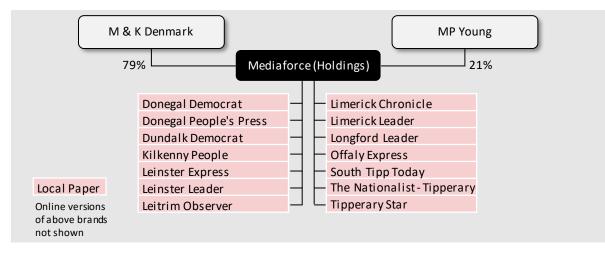
<sup>&</sup>lt;sup>71</sup> ABC

<sup>72</sup> Fig 50, DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>, June 2018

<sup>&</sup>lt;sup>73</sup> Communications Chambers analysis of data from JNLR

<sup>&</sup>lt;sup>74</sup> DCCAE, <u>Merger 2017 4</u> [accessed 11 August 2018]

#### **Mediaforce**



Mediaforce is a UK-based group controlled by Malcolm Denmark and family. It holds a portfolio of Irish local newspapers via Iconic Newspapers Ltd, acquired from Johnston Press for £7.2m in 2014.

#### Changes of ownership

The scope of the two largest news providers, RTÉ and INM/Communicorp, are largely unchanged over the period (though both have seen consumption changes). However, below this level there has been aggregation, with News Corp adding local radio stations to its newspapers and TV3 and UTV combining under Virgin. Further, after the period the *Irish Times* has been combined with the Landmark portfolio of assets.

In many cases these mergers and closures are the result of a challenging environment for both print and broadcast Irish media, even in the context of a relatively benign macroeconomic context.

As well as the mergers, there have been a number of instances where outlets have changed hands (or levels of shareholdings have varied), particularly amongst local newspapers and radio. However, since the acquirers did not hold other media assets, plurality issues are less likely, and a media merger notification was not required.

There have also been a number of outlets closed. In addition to TX FM and the four 'Echo' newspapers shut down by Landmark, at least three further local titles have ceased publication – the *Cork News*, the *Galway Independent*, and the *Lucan Gazette*.<sup>76</sup> While not a consequence of media mergers, these closures will clearly have had impact on the plurality of local news in the local markets in question.

<sup>&</sup>lt;sup>76</sup> The last has been folded into the *Dublin Gazette* 

# 8. Share of voice for media groups

In this section we consider the 'share of voice' for different media groups for national and international news – how much they are consumed, both at the level of individual media and at a cross media level.

For this purpose we consider national newspapers, radio, TV and online, though we note that local newspapers will carry some national and international news. For TV and online we primarily focus on those outlets based in the Republic of Ireland. We set aside the BBC and Sky, for example. While overseas outlets are undoubtedly important, particularly for international news, they are unlikely to make a significant contribution to media plurality regarding Irish affairs. Community media is also an important resource for Irish audiences, but they are very rarely used as a primary source of news and are similarly unlikely to make a significant contribution to plurality. They too are therefore set aside in this analysis.

#### Share by sector

Across the four main sectors, the shares of leading national media companies are as follows:

Figure 16: Sector	shares of s	elected med	ia groups, 2	2017 <sup>77</sup>
	Irish TV	Online		National
	news	(excl SM)	Radio	Papers
RTÉ	84.3%	14.7%	32.8%	
INM/Communicorp		31.0%	19.0%	43.8%
TV3	15.3%	2.9%		
News Corporation		6.7%	12.5%	16.7%
Journal Media		15.5%		
Irish Times		10.1%		15.3%
Landmark Media		9.7%	2.8%	6.9%
Other	0.4%	9.5%	33.0%	17.4%
-	100.0%	100.0%	100.0%	100.0%

In 2017 RTÉ was the leading player in TV and radio, and INM is the leading player online and in national newspapers. Note that these figures do not include any adjustment to Communicorp's radio share

<sup>&</sup>lt;sup>77</sup> *TV:* Share of viewer hours for news from Irish broadcasters 2017, per Nielsen, Communications Chambers analysis and estimates. Includes current affairs programming. *Online:* Share of Irish news minutes, per SimilarWeb, Communications Chambers analysis and estimate.s for July 2018. *Radio:* JNLR, Communications Chambers analysis for Q4 2017. *Newspapers:* Share of national weekday circulation, per ABC for H2 2017.



to reflect the heavier news content in Newstalk, nor a treatment of Communicorp's provision of wholesale news to other radio stations.

If we were to include international outlets, they would take 21% share of TV news consumption and approximately one-third of online consumption, reducing the shares of Irish outlets pro-rata.<sup>78</sup> Offline Sky and the BBC rank #2 and #3 in terms of reach in Ireland (only behind RTÉ), and online they rank #7 and #6 respectively.<sup>79</sup>

#### **Cross media share**

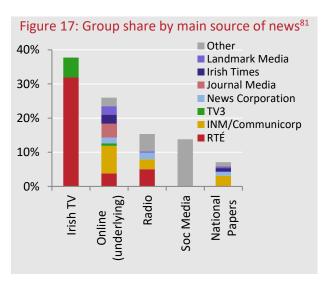
As we discuss above<sup>80</sup>, plurality is best considered at a cross-media level, since most consumers will consume news from multiple media and synthesise across them.

We here provide such a cross-media perspective, based on the importance of different media in consumers' eyes, as measured by the Reuters Institute's recent research. We emphasise that measurement of cross-media plurality is a highly contentious area, and we do not offer this analysis as the best or only way to approach the issue. It is intended as illustrative only.

As we have seen, the Reuters Institute research asked consumers which media they regarded as their main source. In the chart below, we split those citing a given media as their main source by the market share of the providers of that media.

(Note that we have adjusted the Reuters Institute figures to reflect the fact that the research was conducted online, and thus overstates somewhat the share of the overall population who see online sources as most important.<sup>82</sup>)

This analysis gives the results shown in **Error! R eference source not found.**. Given the importance of TV (and, to a lesser extent radio) as news sources RTÉ dominates overall.



<sup>&</sup>lt;sup>78</sup> Nielsen, Similarweb, Communications Chambers analysis and estimates

<sup>79</sup> DCU, <u>Reuters Institute Digital News Report (Ireland) 2018</u>

<sup>&</sup>lt;sup>80</sup> See page 6

<sup>&</sup>lt;sup>81</sup> YouGov survey for Reuters Institute, 2018; Shares per footnote 77; Communications Chambers analysis

<sup>&</sup>lt;sup>82</sup> For example, 32% of the (online) respondents said that online news from underlying outlets (ie not social media) was their main source. However, only 81% of the overall population is online, suggesting that 26% of the total population would have online news from underlying outlets as their main source

INM/Communicorp's strength derives as much from online consumption as offline, given the waning importance to consumers of print consumption.

However, these media have an important difference. TV and radio operate under impartiality regulations, whereas newspapers and online news are free to be partial. RTÉ dominates impartial media, whereas INM/Communicorp has a strong position in media without an impartiality obligation.

The cross media position of each of RTÉ and INM/Communicorp is broadly similar to that three years ago. Both the declining importance of TV and loss of share to TV3 have diminished RTÉ, though this has been partially offset by growth of consumption of RTÉ online. For INM/Communicorp, the decline of newspapers and radio share loss have been largely offset by the growth of online.

The third player is TV3, which has benefited from the acquisition of UTV Ireland (now be3), with increased TV share. However, this analysis reflects the situation as of end 2017. Taking into account the Irish Times / Landmark, this combined group would be of a similar scale to TV3.

#### Local media

The above analysis looks only at share of voice at a national level. An analysis of share and plurality in each local area is beyond the scope of this document. However, we note that there has been very little consolidation of ownership of local media outlets, and hence little change to plurality deriving from ownership changes.<sup>83</sup> That said, there has been some loss of plurality due to closures in certain markets.

<sup>&</sup>lt;sup>83</sup> The only minor exception is the combination of the *Carlow People* with the *Dublin Voice* and *Wicklow Voice* under Informed Voice Media



# 9. Conclusions

Our terms of reference do not ask us to evaluate the sufficiency of plurality in the state: and we note that the answer to this question is notoriously difficult to arrive at and should usually lie in the hands of those with democratic accountability for the overall policy. Instead, we were asked to report on changes of ownership, and the impact these changes have had on plurality in the period.

Media mergers in the period have been subject to the new media merger regime, and thus were all subject to a ministerial finding that they would not be contrary to the public interest in plurality, based on best information and analysis at the time.

For our review, we have examined the effect of those changes in control in aggregate and over time, set in the context of other significant changes in the nature of news provision and consumption in Ireland. While some consolidation in news provision has occurred at the margin, at the end of the period consumers in Ireland could and did still access a broadly similar range of providers as three years prior, and the relative importance of the main news providers was little changed. Similar logic applies to cultural plurality – there has not been a material diminution in the period.

Based on the evidence set out in this report, we therefore conclude that there has not been a significant change in plurality over the period as a result of changes in control.

However, we offer the following general observations about the overall nature of the news market in Ireland, drawing on the analysis contained in this report:

- In common with all other news markets, the importance of the printed press continues to decline. Conversely, the importance of online continues to grow, albeit at a slowing rate
- The ownership of *local* media radio and press remains quite diverse (though inevitably is more concentrated within individual areas)
- At a *national* level, there are two clear cross media leaders: RTÉ and INM/Communicorp. Between 2014 and 2017 RTÉ has seen a slight decline in its importance as a news provider, whereas INM has been roughly stable
- At the next tier down, there has been a measure of consolidation:
  - TV3's combination with UTV Ireland

COMMUNICATIONS CHAMBERS

- Wireless Group with the Irish editions of the *Sun* and *Times*
- The post-period combination of Landmark and the *Irish Times*
- It could be argued that *any* consolidation is bad for plurality. However, a strengthening of players in this second tier may allow them to better balance the strength of the very largest groups
- Moreover, consolidation may be necessary to secure a more stable financial footing in a challenging environment. Print advertising declined at an annual rate of 6% over the period. TV advertising was flat, but contested by more channels.<sup>84</sup> (Such challenges have resulted in redundancies and restructuring across Irish news media, quite apart from any consolidation. In some cases these may have led to a loss of internal plurality)
- Beyond news outlets, online consumption (including social media) continues to make an important contribution to plurality by enabling disintermediation, supporting multisourcing and diffusing the power to set the news agenda
- That said, the advent of the internet has contributed to the economic challenges facing news provision, and the financial viability of newspapers and other providers is a significant concern
- Further, if news consumption is increasingly via a small number of intermediaries, and these intermediaries take on more of a quasi-editorial role, then this may represent a threat to plurality in future. Conversely, if there is a larger number of intermediaries then this may facilitate multisourcing, which could enhance plurality in the future.

<sup>&</sup>lt;sup>84</sup> Core, <u>Outlook 2018</u>, February 2018

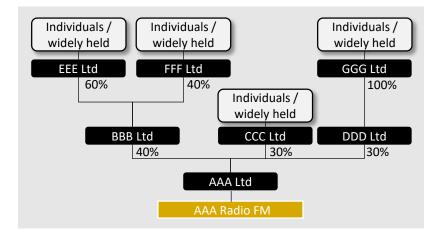


# 10. Appendix: Ownership of media businesses

In the following pages we set out various 'cuts' of the ownership database developed for this report. These cuts enable:

- Identification of who ultimately controls a given media outlet - that is, the 'ultimate holding company' and its shareholders
- Conversely, identification of all the outlets controlled by an ultimate holding company
- For all the shareholders we have identified, their holdings in various legal entities with media interests.

We use 'ultimate holding company' (UHC) to mean the top legal entity in a hierarchy of owners of a media outlet, always travelling up via the largest shareholder of any individual entity. For example, in the diagram below EEE Ltd is the UHC for AAA Radio FM. AAA Radio FM is owned by AAA Ltd, of which the largest single shareholder is BBB Ltd. EEE Ltd is in turn the largest shareholder of BBB Ltd.





#### **Ultimate Holding Company by Outlet**

For the 192 media outlets we have identified, this table provides the media they operate in (TV, national radio and so on); their UHC in 2014 and 2017; the UHC's interest in that outlet; and the UHC's shareholders in 2014 and 2017.

The UHC's interest reflects the hierarchy of ownership. If the outlet is owned outright, the interest will show 100%. However, if it is owned via one or more partial holdings, these will be shown, working 'up'. For instance, in the example above, EEE Ltd's interest in AAA Radio FM would be shown as 40%/60%.

Where there has been a change in ownership of an outlet, that row is highlighted in red.

Note that because the Act's definition of media businesses refers to those "providing any programme material consisting substantially of news and comment on current affairs to a broadcasting service", our list of outlets does not include TV channels (such as the Setanta sports channels) which do not offer such content. See page 24 for a more detailed discussion of the scope of the database.



					Outlet	type(s	)								
	Prime	Nat	Reg	т٧		Reg		Mag Trans			UHC Int in				
Outlet	Platform	Paper	Paper		Radio	Radio				Ultimate holding company	outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
4FM	Radio	1			х		х		2014	Bay Broadcasting Ltd	99%	Kevin Branigan	50% Mike Ormonde	50%	
									2017	Bay Broadcasting Ltd	99%	Kevin Branigan	50% Mike Ormonde	50%	
98FM	Radio					х	х		2014	Communicorp	100%/83%	Denis O'Brien	100%		
		1			-				2017	Communicorp	100%/83%	Denis O'Brien	100%		
Anglo Celt	Print		х				х		2014	Celtic Media Ltd	100%	Frank Mulrennan	36% Frank Long	26% Jonathan Wood	13 '
									2017		100%	Frank Mulrennan	38% Frank Long	27% Jonathan Wood	14
Argus	Print	1	х				x		2014		100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5
		1								Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6
Athlone Advertiser	Print		х				х			Community Newspapers Ltd	94%	R O'Gorman	100%		
								-	2017		84%	R O'Gorman	57% Peter Timmins	12% Joe Hynes	7
Athlone Topic	Print	1	х						-	Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10 %	
					1					Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10 %	
Avondhu Press	Print		х				х			Avondhu Press Ltd	100%	Liam & Maureen Howard	100%		
	TV								< <u> </u>	Avondhu Press Ltd	100%	Liam & Maureen Howard	100%		
BBC	TV	1		х			х	-		BBC	100%	UK Government	100%		
					1					BBC	100%	UK Government	100%		
be3	TV			Х			х	-		Wireless Group Ltd [ex UTV Media PLC]	100%	Fidelity Worldwide	10% Old Mutual	6% Blackrock	6'
Beat FM	Radio					х	х		5	Liberty Global Landmark Media Investments	100% 83%	John Malone T & T Crosbie	27% 100%		
Beat FIN	Radio					^	· ·		2014		83%	T & T Crosbie	100%		
Bray People	Print	1	x		1		x		< · · ·	Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5
Bray People	Print		^				^		2014	the second se	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond] 29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	5
Breaking News.ie	Online						x		201/		100%	T & T Crosbie	100%	15% Farringdon	0
Dreakingivews.ie	Onine						^		4	Landmark Media Investments	100%	T & T Crosbie	100%		
Business Plus	Print				1		x	x		Nalac Ltd	100%	Nicholas Mulcahy	89% Siobhan O'Connell	10% Ann O'Neill	1
D 4311633 1 143							^	~		Nalac Ltd	100%	Nicholas Mulcahy	89% Siobhan O'Connell	10% Ann O'Neill	1
Buzz.ie	Online				1		X		<	[Not in operation]	100%	[Not in operation]	100%		
Dullino	C.I.I.I								2017		50%	Denis O'Brien	29.9% IU Nominees [Dermot Desmond]	15% Farringdon	6
Buzzfeed	Online						X			BuzzFeed Inc	100%	[no data]			
										BuzzFeed Inc	100%	Comcast	25%		
C103	Radio				1	x	X		2014		100%	Fidelity Worldwide	10% Old Mutual	6% Blackrock	6
		1					-		2017	News Corporation	100%	Murdoch Family	39%		
Carlow People	Print		х				X		2014	Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5
· · · · · ·									2017	Informed Voice Media Ltd	100%	Graham O'Neill	57% Galmor Ltd	31% Maria Nulty	13
Carrigdhoun	Print		х		-		х		2014	Carrigdhoun News Ltd	100%	Vincent O'Donovan	100%		
					-		-		2017	Carrigdhoun News Ltd	100%	Vincent O'Donovan	100%		
Channel 4	TV			х			х		2014	Channel Four Television Corporation	100%	UK Government	100%		
									2017	Channel Four Television Corporation	100%	UK Government	100%		
Clare Champion	Print		х				х		2014	Fuinseog Holdings Ltd	100%	John Galvin	63% David Galvin	18% Clare Champion Ltd	181
					-				2017	Fuinseog Holdings Ltd	100%	John Galvin	51% David Galvin	18% Clare Champion Ltd	18
Clare Courier	Print		х				х		2014	Courier Publications Ltd	100%	Eugene McCafferty	50% Catherine McCafferty	50%	
									2017	Courier Publications Ltd	100%	Eugene McCafferty	50% Catherine McCafferty	50%	
Clare FM	Radio					х	х		2014	Clare Community Radio Holdings PLC [ex Clare Comm	100%	Gael Linn	8% Golden Vale Investments Ltd	8% Galvin, Anthony	6
					-					Clare Community Radio Holdings PLC	100%	Gael Linn	8% Golden Vale Investments Ltd	8% Galvin, Anthony	6
Clare People	Print		х				х			Clare College News Ltd	100%	Domhnal Slattery	100%		
									2017	Clare College News Ltd	100%	Domhnal Slattery	100%		
Clondalkin News	Print		х				х		2014		100%	Elizabeth Russell	90% Anthony Russell	10 %	
		-			-					Motoring Life Magazine Ltd	100%	John Russell	50% Sarah Brooks	50%	
CNN	TV						х			Time Warner	100%	ZZ Widely Held	100%		
									2017	Time Warner	100%	ZZ Widely Held	100%		



					Outlet	type(s)									
Outlet	Prime Platform	Nat Paper	Reg Paper		Nat Radio	Reg Radio	Online	Mag Trans		Ultimate holding company	UHC Int in outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
Connacht Tribune	Print		х	1			x		2014	The Connacht Tribune Ltd	100%	TINaughton	30% Peter Allen	15% Brian O'Reilly	7%
									2017	The Connacht Tribune Ltd	100%	JNaughton	30% Peter Allen	15% Brian O'Reilly	7%
Connaught Telegraph	Print		х				х		2014	Celtic Media Ltd	100%	Frank Mulrennan	36% Frank Long	26% Jonathan Wood	139
									2017	Celtic Media Ltd	100%	Frank Mulrennan	38% Frank Long	27% Jonathan Wood	14 %
Cork Independent	Print		х				X	X	2014	Independent Free Newspapers Group Ltd	100%	Declan Dooley	50% Jarlath Feeney	50%	
										Independent Free Newspapers Group Ltd	100%	Jarlath Feeney	100%		_
Cork News	Print		х				х			Cork News and Media Ltd	100%	Daniel Carey	80% Christopher Dineen	10% Susan Dineen	10 %
										[Not in operation]	100%	[Not in operation]	100%		4
Cork's 96fm	Radio					х	×			Wireless Group Ltd [ex UTV Media PLC]	100%	Fidelity Worldwide	10% Old Mutual	6% Blackrock	6'
										News Corporation	100%	Murdoch Family	39%		_
Corkman	Print		х				х			Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5
										Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	69
Cork's Red FM	Radio					х	х			Vienna Investments	69%	Jim Mulqueen	50% Deirdre Kiely	50%	
										Vienna Investments	69%	Jim Mulqueen	50% Michael Shelley	50%	
Derry Journal	Print		х				x			Johnston Press PLC	100%	Usaha Tegas	19% Cazeno ve Capital Management	8% Orbis Investment Management Ltd	
	0.11									Johnston Press PLC	100%	Custos Equity	20% Usaha Tegas	11% Crystal Amber Fund	10 %
Donegal Daily	Online						x			Donegal Daily Ltd	100% 100%	Brenda O'Neill Brenda O'Neill	50% Stephen Maguire	50% 50%	
Denegal Democrat	Print		х				х			Donegal Daily Ltd	100%	Malcolm Denmark	50% Stephen Maguire 73% M P Young	21% K Denmark	69
Donegal Democrat	Print		~				^			Mediaforce (Holdings) Ltd Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young 73% M P Young	2 1% K Denmark	6
Donegal News	Print		х				x		201/			Austin Lynch	23% Gerard Lynch	14% Nora Egan	149
Donegar News	FILL		^				^			The North-West of Ireland Printing & Publishing Co Lt		Nora Egan	15% Gerard Lynch	14% Veranne Lynch	14 129
Donegal People's Press	Print		х							Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6
Donegan copie si ress			~							Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	69
Donegal Post	Print		х				х			River M edia Newspapers Ltd	100%	Fitzpatrick Family	75% Tim Collins	13% Padraig O'Dwyer	13 9
Donogai i ost			~							River Media Newspapers Ltd	100%	Fitzpatrick Family	88% Anne Sykes	13%	10.
Drogheda Independent	Print		х				х			Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5
									2017		100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	69
Drogheda Leader	Print		х							Viaduct Publishing Ltd	100%	And rew Gates	50% Desmond Grant	50%	
										Viaduct Publishing Ltd	100%	And rew Gates	50% Desmond Grant	50%	
Dublin Gazette	Print		х				х		2014	Gazette Group Newspapers Ltd	100%	D'Olier Investments Ltd	64% Mary Leane	13% Michael McGovern	129
									2017	Gazette Group Newspapers Ltd	100%	Thomas Kelley	35% Mary Leane	25% Bill Kelley	209
Dublin Voice	Print		х				x		2014	[Unknown]	100%	[Unknown]	100%		
									2017	Informed Voice Media Ltd	100%	Graham O'Neill	57% Galmor Ltd	3 1% Maria Nulty	13 9
Dublins Q102	Radio					х	х		2014	Wireless Group Ltd [ex UTV Media PLC]	100%	Fidelity Worldwide	10% Old Mutual	6% Blackrock	69
									2017	News Corporation	100%	Murdoch Family	39%		
Dundalk Democrat	Print		х				х		2014	Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	69
									2017	Mediaforce (Holdings) Ltd	100%	M alcolm Denmark	73% M P Young	21% K Denmark	69
Dundalk Leader	Print		х						2014	Oriel Leader Ltd	100%	Peter Keirans	75% Viaduct Publishing Ltd	25%	
										Oriel Leader Ltd	100%	Peter Keirans	75% Viaduct Publishing Ltd	25%	
Dungarvan Leader	Print		х							C. & L. Publications Ltd	100%	Colm Nagle	50% Linda Nagle	50 %	
										C. & L. Publications Ltd	100%	Colm Nagle	50% Linda Nagle	50 %	_
Dungarvan Observer	Print		х							Dungarvan Observer Ltd	100%	James Lynch	90% Mary Lynch	10 %	
										Dungarvan Observer Ltd	100%	James Lynch	90% Mary Lynch	10 %	
East Coast FM	Radio					х	х		2014		78%	Sean Ashmore	100%	500	
										Heart Media Ltd	47%	Sean Ashmore	50% Ciara O'Connor	50%	
East Cork Journal	Print		х				x			Nals Ltd	100%	Louise Wilson	100%		
Esha (Dehlia)	Delet		v				v			Nais Ltd	100%	Arnis Svageris	100%	0000 Decede Marshier	-
Echo (Dublin)	Print		х				x			Kennedy Echo Publishing Ltd	100%	Emma Kennedy	33% Peter Kennedy	33% Brenda Mockler	339
		8		1				1	2017	Kennedy Echo Publishing Ltd	100%	Emma Kennedy	33% Peter Kennedy	33% Brenda Mockler	33



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Calway Advertiser      Print      X      X      X      X      X      Z      Z      St Caruy Fox      00%      Murdoch Family      33% Capital Research & Management Co      10%        Galway Advertiser      Print      X      X      X      Z      Z      Commuty Newspapers Lid      94%      R O'Gorman      70%      Peter Timmins      12%        Galway Bay FM      Radio      X      X      X      Z      Z007      Commuty Newspapers Lid      94%      R O'Gorman      70%      Peter Timmins      12%        Galway Independent      Print      X      X      X      Z      Z007      The Connecht Tribune Lid      100%      J Naugiton      30% Peter Allen      5%        Galway Independent      Print      X      X      X      Z      Z007      Canneth Co, Inc      100%      J Naugiton      30% Capital Research & Management Co      10%        Ganett Litles      Print      X      X      X      Z      Z007      The Connecht Tribune Lid      100%      J Naugiton      30% Capital Research & Management Co      10%      207	á
Selvery Advertiser    Print    N <td></td>	
And No.	6 TCI Fund management
Galway Bay FM      Radio      L      L      X      X      X      X      X      Z      2014      The Conracht Tribune Lid      00%      T Naughton      30% Peter Allen      19%        Galway Independent      Print      X      X      X      X      X      X      Z      Z017      The Conracht Tribune Lid      00%      T Naughton      30% Peter Allen      19%        Galway Independent      Print      X      Z      Z014      Ganett Co, Inc      100%      Z2 Widely Held      100%      Z      Z014      <	
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Gorey Echo    Print    X    X    X    X    2017    Alphabet Inc    100%    ZZ Widey Held    100%      Gorey Echo    Print    X    X    X    2017    Landmark Media Investments    100%    T& T Crosbie    100%    100%      Gorey Guardian    Print    X    X    Z    Z017    [Not in operation]    100%    Not in operation]    100%    15%      Guardian    Print    X    X    Z    Z017    Independent News and Media PLC    100%    Denis O'Brien    29.9% IIU Nominees [Dermot Desmond]    15%      Guardian    Print    R    X    Z    2017    Guardian News and Media PLC    100%    Scott Trust    100%    15%      Guardian    Print    R    X    Z    2017    Guardian News and Media Ltd    100%    Scott Trust    100%    10%	Media Dev't Investment Fund
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Gorey Guardian    Print    X    X    2014    Independent News and Media PLC    100%    Denis O'Brien    29.9% IIU Nominees [Dermot Desmond]    15%      Guardian    Print    C    A    2014    Independent News and Media PLC    100%    Denis O'Brien    29.9% IIU Nominees [Dermot Desmond]    15%      Guardian    Print    C    A    2014    Guardian News and Media Ltd    100%    Scott Trust    100%    100%    100%    100%    100%    100%    10%	
Cuardian  Print  Print  Cuardian  X  2017  Independent News and Media PLC  100%  Denis O'Brien  29.9% IIU Nominees [Dermot Desmond]  15%    Guardian  Print  Cuardian  X  2014  Guardian News and Media Ltd  100%  Scott Trust  100%  100%    her.ie  Online  X  2014  Guardian News and Media Ltd  100%  Scott Trust  100%  100%	6 Anthony O'Reilly (Sir)
Guardian    Print    X    2014    Guardian News and Media Ltd    100%    Scott Trust    100%    100	6 Farringdon
Image: Construction of the second s	3 Fairinguon
her.ie Online X 2014 Maximum Media Network Ltd 100% Niall McGarry 73% Jerry Flannery Jr 10%	
	6 Gary Mernagh
	6 Jerry Flannery Jr
	Anthony O'Reilly (Sir)
	6 Farringdon
	6 Maureen Rabbitt
	6 Maureen Rabbitt
	6 Jim Fitzpatrick
	6 Jim Fitzpatrick
Huffington Post Online X 2014 AOL 100% ZZ Widely Held 100%	
2017 Verizon Comms Inc 100% ZZ Widely Held 100%	
Independent (UK) Print X 2014 Independent Print Ltd 100% Lebedev family 100%	
	Justin Shaw 2
	6 Anthony O'Reilly (Sir)
2017 Independent News and Media PLC 100% Denis O'Brien 29.9% IIU Nominees [Dermot Desmond] 15%	6 Farringdon



				01	ıtlet type(	s)						
	Prime	Nat Paper	Reg Paper	TV N		Online Mag Trans		UHC Int in				0110.01
Outlet	Platform	гарег	гарег	Kat			Ultimate holding company	outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
Inish Times	Print		х			х	2014 River Media Newspapers Ltd	100%	Fitzpatrick Family	75% Tim Collins	13% Padraig O'Dwyer	13 %
							2017 River Media Newspapers Ltd	100%	Fitzpatrick Family	88% Anne Sykes	13 %	
Inishowen Independent	Print		х			Х	2014 D & D M edia Ltd	100%	PJ M cDermott	40% Donal Campbell	30.0% Damian Dowds	30.0%
							2017 D & D M edia Ltd	100%	PJ M cDermott	40% Donal Campbell	30.0% Damian Dowds	30.0%
iRadio NE	Radio				х	Х	2014 Highcross Communications Ltd	47%	John Mannion	99% Highcross Holdings Ltd	1%	
							2017 Highcross Holdings Ltd	48%	John Mannion	100%		
iRadio NW	Radio				Х	х	2014 Highcross Communications Ltd	47%	John Mannion	99% Highcross Holdings Ltd	1%	
							2017 Highcross Holdings Ltd	48%	John Mannion	100%		
Irish Daily Mail	Print	х				х	2014 DM GT plc	100%	Viscount Rothermere	100%		
		1					2017 DM GT plc	100%	Viscount Rothermere	100%		
Irish Daily Mirror	Print	Х				Х	2014 Reach PLC [ex Trinity Mirror]	100%	ZZ Widely Held	100%		
							2017 Reach PLC	100%	ZZ Widely Held	100%		
Irish Daily Star	Print	х				х	2014 Independent News and Media PLC	50%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
							2017 Independent News and Media PLC	50%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
Irish Examiner	Print	Х				Х	2014 Landmark Media Investments	100%	T & T Crosbie	100%		
							2017 Landmark Media Investments	100%	T & T Crosbie	100%		
Irish Farmers Journal	Print	х				х	2014 The Agricultural Trust	100%	[n/a]	100%		
							2017 The Agricultural Trust	100%	[n/a]	100%		
Irish Independent	Print	Х				Х	2014 Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
							2017 Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
Irish Mail on Sunday	Print	Х				x	2014 DM GT plc	100%	Viscount Rothermere	100%		
							2017 DM GT plc	100%	Viscount Rothermere	100%		
Irish Sun	Print	Х				Х	2014 News Corporation	100%	Murdoch Family	39%		
							2017 News Corporation	100%	Murdoch Family	39%		
Irish Sun on Sunday	Print	Х				х	2014 News Corporation	100%	Murdoch Family	39%		
		1					2017 News Corporation	100%	Murdoch Family	39%		
Irish Sunday Mirror	Print	х				Х	2014 Reach PLC [ex Trinity Mirror]	100%	ZZ Widely Held	100%		
							2017 Reach PLC	100%	ZZ Widely Held	100%		
Irish Times	Print	х				х	2014 Irish Times Designated Activity Company [ex Irish T		Irish Times Trust Ltd	100%		
		1					2017 Irish Times Designated Activity Company	100%	Irish Times Trust Ltd	100%		
ITV	TV			Х		Х	2014 ITV plc	100%	Liberty Global	6% Blackrock	5%	
							2017 ITV plc	100%	Capital Group	10% Liberty Global	10%	
joe.ie	Online					х	2014 Maximum Media Network Ltd	100%	Niall McGarry	73% Jerry Flannery Jr	10% Gary Mernagh	5%
		1					2017 Maximum Media Network Ltd	100%	Niall McGarry	50% First Names Trust Co (Ireland) Ltd	26% Jerry Flannery Jr	13 %
KCLR 96FM	Radio				х	Х	2014 CK Broadcasting Ltd	100%	John Purcell	20% Irish Radio & Media Holdings Ltd	17% Independent News and Media PLC	12%
							2017 CK Broadcasting Ltd	100%	John Purcell	20% Irish Radio & Media Holdings Ltd	17% Independent News and Media PLC	12%
Kerryman	Print		х			Х	2014 Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
		1					2017 Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
Kerry's Eye	Print		х			Х	2014 Kerry's Eye Ltd	100%	Brendan Kennelly	50% Padraig Kennelly Snr	50%	
							2017 Kerry's Eye Ltd	100%	Brendan Kennelly	50% Padraig Kennelly Snr	50%	
KFM	Radio	0			х	X	2014 Co. Kildare FM Radio Ltd	100%	Dermot Weld	39% County Kildare Broadcasting Ltd	20% David Mongey	14 %
							2017 County Kildare Broadcasting Ltd	59%	David Mongey	35% Sean Ashmore	25% Clem Ryan	25%
Kildare Nationalist	Print		х			Х	2014 Landmark Media Investments	100%	T & T Crosbie	100%		
							2017 Landmark Media Investments	100%	T & T Crosbie	100%		
Kildare Post	Print	8	х			х	2014 River Media Newspapers Ltd	100%	Fitzpatrick Family	75% Tim Collins	13% Padraig O'Dwyer	13 %
		-					2017 River Media Newspapers Ltd	100%	Fitzpatrick Family	88% Anne Sykes	13%	
Kilkenny People	Print		Х			х	2014 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
							2017 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Laois Nationalist	Print	8	х			х	2014 Landmark Media Investments	100%	T & T Crosbie	100%		
		1	1		8		2017 Landmark Media Investments	100%	T & T Crosbie	100%		1



#### Ultimate holding company by outlet

				(	Outlet t	ype(s)								
	Prime	Nat	Reg	тν	Nat	Reg	Online Mag 1	ns		UHC Int in				
Outlet	Platform	Paper	Paper	R	ladio R	Radio			Ultimate holding company	outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
Leinster Express	Print		Х				х	20	4 Mediaforce (Holdings) Ltd	100%	M alcolm Denmark	73% M P Young	21% K Denmark	6%
								20	7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Leinster Leader	Print		х				х	20	4 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
								20	7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Leitrim Observer	Print		х				х	20	4 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
								20	7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Letterkenny Post	Print		х		8		х	20	4 River Media Newspapers Ltd	100%	Fitzpatrick Family	75% Tim Collins	13% Padraig O'Dwyer	13%
								20	7 River Media Newspapers Ltd	100%	Fitzpatrick Family	88% Anne Sykes	13%	
Limerick Chronicle	Print		х				х	20	4 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
								20	7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Limerick Leader	Print		х		8		х	20	4 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
					8			20	7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Limerick Post	Print		х				х х	20	4 Carnbeg Ltd	100%	William Ryan	97% John Ryan	3%	
								20		100%	William Ryan	100%		
Limerick's Live 95FM	Radio					X	X	20	4 Wireless Group Ltd [ex UTV Media PLC]	100%	Fidelity Worldwide	10% Old Mutual	6% Blackrock	6%
								20	7 News Corporation	100%	Murdoch Family	39%		
LMFM	Radio					X	x	20	4 Wireless Group Ltd [ex UTV Media PLC]	100%	Fidelity Worldwide	10% Old Mutual	6% Blackrock	6%
								20	7 News Corporation	100%	Murdoch Family	39%		
Longford Leader	Print		х			2	x		4 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
								20	7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Lucan Gazette	Print		х				х		4 Gazette Group Newspapers Ltd	100%	D'Olier Investments Ltd	64% Mary Leane	13% Michael McGovern	12%
									7 [Not in operation]	100%	[Not in operation]	100%		
Lucan News	Print		х			-	x	20	4 Local Press Ltd	100%	Elizabeth Russell	90% Anthony Russell	10%	
									7 Motoring Life Magazine Ltd	100%	John Russell	50% Sarah Brooks	50%	
Mallow Star	Print		х				х		4 VSO Publications Ltd	100%	Mary Morrissey	50% Jeremiah Morrissey	50%	
									7 VSO Publications Ltd	100%	Mary Morrissey	50% Jeremiah Morrissey	50%	
Mayo Advertiser	Print		х			2	x		4 Community Newspapers Ltd	94%	R O'Gorman	100%		
								20		84%	R O'Gorman	57% Peter Timmins	12% Joe Hynes	7%
Mayo News	Print		х				х		4 Mayo News (Holdings) Ltd	100%	Dermot Berry	100%		
									7 Mayo News (Holdings) Ltd	100%	Dermot Berry	100%		
Meath Chronicle	Print		х				x		4 Celtic Media Ltd	100%	Frank Mulrennan	36% Frank Long	26% Jonathan Wood	13 %
					8			20	7 Celtic Media Ltd	100%	Frank Mulrennan	38% Frank Long	27% Jonathan Wood	14%
Meath Topic	Print		х						4 Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10%	
									7 Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10%	
Mid West Radio	Radio					х	x	20	4 County Mayo Radio Ltd	100%	Chris Carroll	29% Paul Claffey	29% North Connaught Farmers Co-op	27%
					8			20	7 County Mayo Radio Ltd	100%	Chris Carroll	29% Paul Claffey	29% Co Op Society Ltd Aurivo	27%
Midland Tribune	Print		х				х	20	4 Tontine Rooms Holding Co Ltd	100%	John Taylor	33% Robert Todd	29.6% Mary Taylor	19%
								20	7 Tontine Rooms Holding Co Ltd	100%	John Taylor	33% Robert Todd	29.6% Mary Taylor	19%
Midlands 103	Radio					х	x	1-1	4 Midland Community Radio Services Ltd	100%	Ray Tindle	100%		
									7 Midland Community Radio Services Ltd	100%	Ray Tindle	100%		
MSN	Online						х		4 Microsoft Corp	100%	Vanguard Group	5% State Street	4% Capital World	4%
									7 Microsoft Corp	100%	Vanguard Group	7% Blackrock	4% SSgA Funds Management	4%
Mullingar Advertiser	Print		х	1		1	x		4 Community Newspapers Ltd	94%	R O'Gorman	100%		
J									7 Community Newspapers Ltd	84%	R O'Gorman	57% Peter Timmins	12% Joe Hynes	7%
M unster Express	Print		х				х		4 The Munster Express Ltd	100%	Keiran Walsh	80% Priscilla Walsh	20%	
									7 The Munster Express Ltd	100%	Keiran Walsh	83% Priscilla Walsh	17%	
Nationalist - Carlow	Print		х	1		1	x		4 Landmark M edia Investments	100%	T & T Crosbie	100%		
								20		100%	T & T Crosbie	100%		
Nationalist - Tipperary/Clonme	el Print		х				x		4 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
									7 Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	2 1% K Denmark	6%



		_				type(s)									
Outlet	Prime Platform	Nat Paper	Reg Paper	тν	Nat Radio	Reg Radio	Online	Mag Trans		Ultimate holding company	UHC Int in outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
Nenagh Guardian	Print		х				x		2014	Nenagh Guardian Ltd	100%	Patrick Ryan	48% Ann Spring	48% Mark Hassett	3%
Ū				1			-		2017	Nenagh Guardian Ltd	100%	Patrick Ryan	48% Ann Spring	48% Mark Hassett	3%
New Ross Echo	Print		х				x		2014	•	100%	T & T Crosbie	100%		
									2017	[Not in operation]	100%	[Not in operation]	100%		
New Ross Standard	Print		х				х		2014		100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
				1			-		2017	Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
New York Times	Print						х		2014	The New York Times Company	100%	Carlos Slim	17%	-	
									2017	The New York Times Company	100%	Carlos Slim	10% Darsana Capital Partners	9%	
Newstalk	Radio				х		х		2014	Communicorp	63%/100%83%	Denis O'Brien	100%		
									2017		72%100%83%		100%		
Northern Sound Radio	Radio					х	X		2014		100%	Denis Kelliher	11% Halstead Enterprises	11% Ardfert Christian Media Trust	11%
									2017	, ,	100%	Denis Kelliher	11% Radio Phobail Chiarrai Teoaranta	11% Ardfert Christian Media Trust	11%
Northern Standard, Monagha	Print		х				х		2014		100%	Colette Smyth	20% Cathal Smyth	9% Ann Waterson	9%
									2017		100%	Colette Smyth	20% Cathal Smyth	9% Ann Waterson	9%
Northside People East	Print		х				x			North Dublin Publications Ltd	100%	Robin Webb	64% Peter Butler	36%	
									2017		100%	David Mahon	50% Robin Webb	50%	
Northside People West	Print	1	х	1			x		2014	1	100%	Robin Webb	64% Peter Butler	36%	
Northalder copie weat			~						2017		100%	David Mahon	50% Robin Webb	50%	
Ocean FM	Radio					х	х			North West Broadcasting Ltd	100%	Padraig O'Dwyer	24% Martin Reilly	15% Tim Collins	15%
	rtuaro					~	î.		2017	•	100%	Padraig O'Dwyer	24% Martin Reilly	15% Tim Collins	15%
Offaly Express	Print	1	х	1			х		2014		100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Onaly Express	FINA		^				^		2017		100%	Malcolm Denmark	73% M P Young	21% K Denmark	6%
Offaly Independent	Print		х				х		2014		100%	Frank Mulrennan	36% Frank Long	26% Jonathan Wood	13 %
Onaly independent	FINA		^				^		2017		100%	Frank Mulrennan	38% Frank Long	27% Jonathan Wood	13 %
Offaly Topic	Print		х	1					201/		100%	Richard Hogan	90% Thomas Kiernan	10%	14 /0
onaly ropic	FINA		^	1						Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10%	
Oireachtas TV	TV			x					201/		100%	Irish Government	100%	10 70	
Oneachtas TV	IV			^					2014		100%	Irish Government	100%		
Phoenix	Print		х				х		201/		100%	Aengus Mulcahy	100% Brigid Mulcahy	0%	
FIDEIIX	FILL		^				^		2014		100%	Aengus Mulcahy	100% Brigid Mulcahy 100% Brigid Mulcahy	0%	
Radio Kerry	Radio					х	х		201/		100%	Denis Kelliher	11% Halstead Enterprises	11% Ardfert Christian Media Trust	11%
Radio Relly	Raulo					^	^		2014	, ,	100%	Denis Kelliher	11% Radio Phobail Chiarrai Teoaranta	11% Ardfert Christian Media Trust	11%
Radio Nova	Radio					х	х		201/ 2014		37%	1	50% Mike Ormonde	50%	TI%
Radio Nova	Radio					^	^	-	2014		38%	Kevin Branigan	50% Mike Ormonde	50%	
Dathas als 8 Concert Name	Print		х				x			Local Press Ltd	100%	Kevin Branigan Elizabeth Russell		10%	
Rathcoole & Saggart News	Print		^				^						90% Anthony Russell		
De construction de la constructi	Print		v				v		2017		100% 100%	John Russell	50% Sarah Brooks	50%	
Roscommon Herald	Print		х	1			х	-	2014		1	T & T Crosbie	100%		
									2017		100%	T & T Crosbie	100%	500/	
Roscommon People	Print		Х				х		2014		100%	Fiona Healy	50% Paul Healy	50%	
o té					v				2017		100%	Fiona Healy	50% Paul Healy	50 %	
RTÉ	Broadcast			х	х		х	x	2014		100%	Irish Government	100%		
							1		2017		100%	Irish Government	100%		_
Shannonside	Radio					х	х			Radio Kerry Holdings Ltd	100%	Denis Kelliher	11% Halstead Enterprises	11% Ardfert Christian Media Trust	11%
									2017		100%	Denis Kelliher	11% Radio Phobail Chiarrai Teoaranta	11% Ardfert Christian Media Trust	11%
Sky News	τv			х			х	x		21st Century Fox	39%	Murdoch Family	39%		8
										21st Century Fox	39%	Murdoch Family	39% Capital Research & Management Co	10% TCI Fund management	7%
Sligo Champion	Print		х				х			Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
									2017		100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
Sligo Weekender	Print		х				х			Datascope Ltd	100%	Kevin Mitchell	60% The Trustee Company Ltd	40%	8
		1		1			5		2017	Datascope Ltd	100%	Kevin Mitchell	60% The Trustee Company Ltd	40%	8



					Outlet	tvpe(s)								
	Prime	Nat	Reg	т٧	Nat	Reg	Online Mag Trans			UHC Int in				
Outlet	Platform	Paper	Paper		Radio	Radio			Ultimate holding company	outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
South East Radio	Radio	1				х	х	2014	Filbeck Ltd	32%	Eamon Buttle	33% Norman Buttle	33% Corrmuda Ltd	339
								2017	Filbeck Ltd	32%	Eamon Buttle	33% Norman Buttle	33% Corrmuda Ltd	339
South Tipp Today	Print		х				х	2014	Mediaforce (Holdings) Ltd	100%	M alcolm Denmark	73% M P Young	21% K Denmark	69
		8						2017	Mediaforce (Holdings) Ltd	100%	M alcolm Denmark	73% M P Young	2 1% K Denmark	69
Southern Star	Print		х				Х	2014	Southern Star Ltd	100%	Lisa Collender	20% Fiona Field	20% Breffni Horgan	20%
								2017		100%	Lisa Collender	20% Fiona Field	20% Breffni Horgan	20%
Southside People	Print		x				X	2014	North Dublin Publications Ltd	100%	Robin Webb	64% Peter Butler	36%	
								-	North Dublin Publications Ltd	100%	David Mahon	50% Robin Webb	50%	
Spin 1038	Radio					х	х	2014		100%83%	Denis O'Brien	100%		
		1						-	Communicorp	100%83%	Denis O'Brien	100%		
Spin South West	Radio					х	х	-	Communicorp	45%	Denis O'Brien	100%		
									Communicorp	55%	Denis O'Brien	100%	49%	
Sunday Business Post	Print	х					х		Mallcot Ltd Mallcot II Ltd	71% 68%53%	Conor Killeen Conor Killeen	51% Mary Killeen 100% Mary Killeen	49%	
Sunday Independent	Print	x					x	201/	Independent News and Media PLC	100%	Denis O'Brien	29.9% IU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
Sunday independent	FILL	^					^	-2	Independent News and Media PLC	100%	Denis O'Brien	29.9% IU Nominees [Dermot Desmond]	15% Farringdon	69
Sunday Times	Print	х					X	-	News Corporation	100%	Murdoch Family	39%	10% Farmguon	07
Sunday Times	FIUK	^					^		News Corporation	100%	Murdoch Family	39%		
Sunday World	Print	х					x	2014	· ·	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	59
		~					~		Independent News and Media PLC	100%	Denis O'Brien	29.9% IU Nominees [Dermot Desmond]	15% Farringdon	69
Sunshine 106.8FM	Radio					х	x		Bay Broadcasting Ltd	46%	Kevin Branigan	50% Mike Ormonde	50%	
									Bay Broadcasting Ltd	46%	Kevin Branigan	50% Mike Ormonde	50%	
Tallaght News	Print		х				X	2014	Local Press Ltd	100%	Elizabeth Russell	90% Anthony Russell	10%	
, in the second s									M otoring Life M agazine Ltd	100%	John Russell	50% Sarah Brooks	50%	
Telegraph	Print						х	2014	Telegraph Media Group Ltd	100%	Barclay Brothers	100%		
								2017	Telegraph Media Group Ltd	100%	Barclay Brothers	100%		
TG4	TV			х			х	2014	Teilifís na Gaeilge	100%	Irish Government	100%		
		1						2017	Teilifís na Gaeilge	100%	Irish Government	100%		
TheJournal.ie	Online						Х		DM L Capital Ltd	93%	Brian Fallon	50% Eamonn Fallon	50%	
									DM L Capital Ltd	89%	Brian Fallon	50% Eamonn Fallon	50%	
Times Ireland Edition	Print	х					x		News Corporation	100%	Murdoch Family	39%		
									News Corporation	100%	Murdoch Family	39%		
Tipp FM	Radio					х	Х		Clare Community Radio Holdings PLC [ex Clare Comm		Gael Linn	8% Golden Vale Investments Ltd	8% Galvin, Anthony	69
									Clare Community Radio Holdings PLC	71%/48%	Gael Linn	8% Golden Vale Investments Ltd	8% Galvin, Anthony	69
Tipperary Star	Print		х				х	2014	Mediaforce (Holdings) Ltd	100%	Malcolm Denmark	73% M P Young	21% K Denmark	69
Tirconaill Tribune	Print	1	х						M ediaforce (Holdings) Ltd Tirconaill Tribune Ltd	100% 100%	Malcolm Denmark Francis Diver	73% M P Young 50% John M cAteer	21% K Denmark 50%	69
TIrconalii Tribune	Print		~							100%			50%	
Today FM	Radio				x		x	2017	Tirconaill Tribune Ltd Communicorp	100%	Francis Diver Denis O'Brien	50% John McAteer 100%	50%	
TODAY FIN	Raulo				^		^		Communicorp	100%	Denis O'Brien	100%		
Tuam Herald	Print		х				x		Herald Printing and Publishing Co	100%	John Burke	46% Mary Burke	36% Alpha Publications Ltd	17%
- our - lor ara			~						Herald Printing and Publishing Co	100%	John Burke	46% Mary Burke	36% Alpha Publications Ltd	179
Tullamore Tribune	Print		х				x		Tontine Rooms Holding Co Ltd	100%	John Taylor	33% Robert Todd	29.6% Mary Taylor	199
			~				· ·		Tontine Rooms Holding Co Ltd	100%	John Taylor	33% Robert Todd	29.6% Mary Taylor	19 %
TV3	τv			x			x		TV3 Television Network Ltd	100%	Tullamore Beta Ltd	100%		
									Liberty Global	100%	John Malone	27%		
TX FM 105.2	Radio					х	x		Communicorp	34%	Denis O'Brien	100%		
								2017		100%	[Not in operation]	100%		8
Vale Star	Print		х				х		VSO Publications Ltd	100%	Mary Morrissey	50% Jeremiah Morrissey	50%	
								2017	VSO Publications Ltd	100%	Mary Morrissey	50% Jeremiah Morrissey	50%	



#### Ultimate holding company by outlet

					Outlet	type(s)										
Outlet	Prime Platform	Nat Paper		τv		Reg	Online	Mag	Trans		Ultimate holding company	UHC Int in outlet	S'Holder 1	SH1 % S'Holder 2	SH2% S'Holder 3	SH3 %
Virgin M edia	Transmissio								x	-	Liberty Global	100%	John M alone	28%		
											Liberty Global	100%	John Malone	27%		
Waterford News and Star	Print		х				х				Landmark M edia Investments	100%	T & T Crosbie	100%		
				1							Landmark Media Investments	100%	T & T Crosbie	100%		
Waterford Today	Print		×				×		-	-	Galmor Ltd	100%	Patrick Gallagher	85% Nial Morrissey	14% John Morrissey	2%
Weekly Observer	Print	-	х	1			х		-		Dackar Ltd VSO Publications Ltd	100% 100%	lan Glass Mary Morrissey	71% The Glaoine Partnership Ltd 50% Jeremiah Morrissey	29% 50%	
Weekly Observer	Print		^				^		-					· · · · · · · · · · · · · · · · · · ·	50%	
West Cork People	Print		х	1					-	4	VSO Publications Ltd West Cork People Ltd	100%	Mary Morrissey Mary O'Brien	50% Jeremiah Morrissey 50% Sheila Mullins	50%	
West Cork People	Print		^						-	-	West Cork People Ltd	100%	Mary O'Brien	50% Sheila Mullins	50%	
Western People	Print	1	х				x		-		Landmark M edia Investments	100%	T & T Crosbie	100% Shella Mullins	50%	
western People	PIIII		^				^			2014		100%	T & T Crosbie	100%		
Westmeath Examiner	Print	1	х	1			х	1	-	<	Celtic Media Ltd	100%	Frank Mulrennan	36% Frank Long	26% Jonathan Wood	13%
WestmeathExaminer	FILL	8	^				^		-		Celtic Media Ltd	100%	Frank Mulrennan	38% Frank Long	27% Jonathan Wood	13 %
Westmeath Independent	Print		x				х			5 i i i i i i i i i i i i i i i i i i i	Celtic Media Ltd	100%	Frank Mulrennan	36% Frank Long	26% Jonathan Wood	13%
westmeatringependent			~				^				Celtic Media Ltd	100%	Frank Mulrennan	38% Frank Long	27% Jonathan Wood	13 %
Westmeath Topic	Print		х				х	1		6	Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10%	1470
Westmean ropic		8						1	- F	-	Topic Newspapers Ltd.	100%	Richard Hogan	90% Thomas Kiernan	10%	
Wexford Echo	Print		x				х				Landmark Media Investments	100%	T & T Crosbie	100%	10 10	
										2017		100%	[Not in operation]	100%		
Wexford People	Print		х				х	1		2014		100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
		8							E E	2017		100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
Wicklow People	Print		х				х			2014	Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Anthony O'Reilly (Sir)	5%
·										2017	Independent News and Media PLC	100%	Denis O'Brien	29.9% IIU Nominees [Dermot Desmond]	15% Farringdon	6%
Wicklow Times	Print		х							2014	North Wicklow Times Ltd	100%	James Fitzmaurice	50% Miriam Fitzmaurice	50%	
										2017	North Wicklow Times Ltd	100%	James Fitzmaurice	50% Miriam Fitzmaurice	50%	
Wicklow Voice	Print		х				х			2014	[Unknown]	100%	[Unknown]	100%		
										2017	Informed Voice Media Ltd	100%	Graham O'Neill	57% Galmor Ltd	31% Maria Nulty	13%
WLR FM	Radio	8				х	х			2014	Landmark Media Investments	75%	T & T Crosbie	100%		
										2017	Landmark Media Investments	75%	T & T Crosbie	100%		
Yahoo	Online						х			2014	Yahoo Inc	100%	ZZ Widely Held	100%		
										2017	Verizon Comms Inc	100%	ZZ Widely Held	100%		
Youghal News	Print		х				х			2014	Flanagan Print & Graphics Ltd	100%	Margaret Flanagan	50% Gerald Flanagan	50%	
		8		-				1		2017	Flanagan Print & Graphics Ltd	100%	Margaret Flanagan	50% Gerald Flanagan	50%	8



For the 103 UHCs we have identified, this table provides the relevant outlets together with the UHC's interest in each of those outlets (in the same format as before).

Outlets are split into 'lost' (those for which the entity was the UHC in 2014 but not 2017), retained (UHC in 2014 and 2017) and 'gained' (UHC only in 2017).

Note that 'lost' entities may still be owned by the entity in question, if that entity is no longer a UHC. For example, C103 is shown as a 'lost' outlet for Wireless Group. While Wireless Group continues to own the station, it is no longer a UHC – C103 is now shown against News Corporation, which acquired Wireless Group<sup>85</sup> in 2016.

Outlets are predominantly lost or gained via disposals and acquisitions, but also include instances where an outlet has been closed or launched in the period in question. Thus fora.ie (launched in 2016) is shown as a gained outlet for DML Capital (which owns 89% of Journal Media).

Also shown are the shareholders of the UHC in 2014 and 2017, with changes marked in bold.

Note that a shareholder may have an interest in more than one UHC (as Denis O'Brien does in Communicorp and INM, for example).

<sup>85</sup> Formerly named UTV Media PLC OMMUNICATIONS HAMBERS

UHC	Lost outlets	Retained outlets	Acquired outlets		Shareholder 1		Shareholder 2		Shareholder 3	
21st Century Fox		Fox News 100%		2014	Murdoch Family	39%		0%		0%
		Sky News 39%		2017	Murdoch Family	39%	Capital Research & Management Co	10%	TCI Fund management	7%
Agora SA		Gazeta (Poland) 100%		2014	ZZ Widely Held	100%		0%		0%
0				2017	PTE PZU SA	16%	Agora Holding	11%	Media Development Investment Fund	11%
Alphabet Inc			Google News 100%	2014 2017	[n/a] ZZ Widely Held	100% 100%		0% 0%		0% 0%
AOL	Huffington Post 100%			2014 2017	ZZ Widely Held Verizon Communications Inc	100% 100%		0% 0%		0% 0%
Avondhu Press Ltd		Avondhu Press 100%		2014 2017	Liam & Maureen Howard Liam & Maureen Howard	100% 100%		0% 0%		0% 0%
Bay		4FM 99%		2014	Kevin Branigan	50%	Mike Ormonde	50%		0%
Broadcasting Ltd		Radio Nova 38% Sunshine 106.8FM 46%		2017	Kevin Branigan	50%	Mike Ormonde	50%		0%
BBC		BBC 100%		2014	UK Government	100%		0%		0%
				2017	UK Government	100%		0%		0%
BuzzFeed Inc		Buzzfeed 100%		2014	[no data]	0%		0%		0%
				2017	Comcast	25%		0%		0%
C. & L.		Dungarvan Leader 100%		2014	Colm Nagle	50%	Linda Nagle	50%		0%
Publications Ltd				2017	Colm Nagle	50%	Linda Nagle	50%		0%
Carnbeg Ltd		Limerick Post 100%		2014 2017	William Ryan William Ryan	97% 100%	John Ryan	3% 0%		0% 0%
Carrigdhoun		Carrigdhoun 100%		2014	Vincent O'Donovan	100%		0%		0%
News Ltd				2017	Vincent O'Donovan	100%		0%		0%
Celtic Media Ltd		Anglo Celt 100% Connaught Telegraph 100% Meath Chronicle 100% Offaly Independent 100% Westmeath Examiner 100% Westmeath Independent 100%		2014 2017	Frank Mulrennan Frank Mulrennan	36% 38%	Frank Long Frank Long	26% 27%	Jonathan Wood Jonathan Wood	13% 14%
Channel Four		Channel 4 100%		2014	UK Government	100%		0%		0%
Television Corporation				2017	UK Government	100%		0%		0%
CK Broadcasting Ltd		KCLR 96FM 100%		2014 2017	John Purcell John Purcell	20% 20%	Irish Radio & Media Holdings Ltd Irish Radio & Media Holdings Ltd	17% 17%	Independent News and Media PLC Independent News and Media PLC	12% 12%
Clare College News Ltd		Clare People 100%		2014 2017	Domhnal Slattery Domhnal Slattery	100% 100%		0% 0%		0% 0%
Clare		Clare FM 100%		2014	Gael Linn	8%	Golden Vale Investments Ltd	8%	Galvin, Anthony	6%
Community Radio Holdings PLC		Tipp FM 71%/48%		2017	Gael Linn	8%	Golden Vale Investments Ltd	8%	Galvin, Anthony	6%
Co. Kildare FM Radio Ltd	KFM 100%			2014 2017	Dermot Weld County Kildare Broadcasting Ltd	39% 59%	County Kildare Broadcasting Ltd David Mongey	20% 14%	David Mongey Clem Ryan	14% 10%
Communicorp	TX FM 105.2 34%	98FM 100%/83% Newstalk 72%/100%/83% Spin 1038 100%/83% Spin South West 55% Today FM 100%		2014 2017	Denis O'Brien Denis O'Brien	100% 100%		0% 0%		0% 0%



UHC	Lost outlets	Retained outlets	Acquired outlets		Shareholder 1		Shareholder 2		Shareholder 3	
Community		Athlone Advertiser 84%		2014	R O'Gorman	100%		0%		0%
Newspapers Ltd		Galway Advertiser 84% Mayo Advertiser 84% Mullingar Advertiser 84%		2017	R O'Gorman	57%	Peter Timmins	12%	Joe Hynes	7%
Cork News and	Cork News 100%			2014	Daniel Carey	80%	Christopher Dineen	10%	Susan Dineen	10%
Media Ltd				2017	[n/a]	100%		0%		0%
County Kildare			KFM 59%	2014	Dermot Weld	49%	David Mongey	18%	East Coast Radio Ltd	13%
Broadcasting Ltd				2017	David Mongey	35%	Sean Ashmore	25%	Clem Ryan	25%
County Mayo		Mid West Radio 100%		2014	Chris Carroll	29%	Paul Claffey	29%	North Connaught	27%
Radio Ltd				2017	Chris Carroll	29%	Paul Claffey	29%	Farmers Co-op Co Op Society Ltd Aurivo	27%
Courier		Clare Courier 100%		2014	Eugene McCafferty	50%	Catherine McCafferty	50%		0%
Publications Ltd				2017	Eugene McCafferty	50%	Catherine McCafferty	50%		0%
D & D Media Ltd		Inishowen Independent 100%		2014	PJ McDermott	40%	Donal Campbell	30%	Damian Dowds	30%
				2017	PJ McDermott	40%	Donal Campbell	30%	Damian Dowds	30%
Dackar Ltd			Waterford Today 100%	2014	[n/a]	100%	The Charles Destaughts Ltd	0%		0%
Determent Ltd		Cline Meekender 100%		2017	Ian Glass	71%	The Glaoine Partnership Ltd	29%		0%
Datascope Ltd		Sligo Weekender 100%		2014 2017	Kevin Mitchell Kevin Mitchell	60% 60%	The Trustee Company Ltd The Trustee Company Ltd	40% 40%		0% 0%
DMGT plc		Irish Daily Mail 100%		2017	Viscount Rothermere	100%	The Trustee Company Ltd	40%		0%
Dividit pic		Irish Mail on Sunday 100%		2014 2017	Viscount Rothermere	100%		0%		0%
DML Capital Ltd		TheJournal.ie 89%	Fora.ie 89%	2017	Brian Fallon	50%	Eamonn Fallon	50%		0%
Divit Capital Ltu		mejournalile 85%	1014.16 0576	2014	Brian Fallon	50%	Eamonn Fallon	50%		0%
Donegal Daily		Donegal Daily 100%		2017	Brenda O'Neill	50%	Stephen Maguire	50%		0%
Ltd		bonegar bany 100%		2017	Brenda O'Neill	50%	Stephen Maguire	50%		0%
Dungarvan		Dungarvan Observer 100%		2014	James Lynch	90%	Mary Lynch	10%		0%
Observer Ltd				2017	James Lynch	90%	Mary Lynch	10%		0%
Filbeck Ltd		South East Radio 32%		2014	Eamon Buttle	33%	Norman Buttle	33%	Corrmuda Ltd	33%
				2017	Eamon Buttle	33%	Norman Buttle	33%	Corrmuda Ltd	33%
Flanagan Print &		Youghal News 100%		2014	Margaret Flanagan	50%	Gerald Flanagan	50%		0%
Graphics Ltd				2017	Margaret Flanagan	50%	Gerald Flanagan	50%		0%
Fuinseog		Clare Champion 100%		2014	John Galvin	63%	David Galvin	18%	Clare Champion Ltd	18%
Holdings Ltd				2017	John Galvin	51%	David Galvin	18%	Clare Champion Ltd	18%
Galmor Ltd	Waterford Today			2014	Patrick Gallagher	85%	Nial Morrissey	14%	John Morrissey	2%
	100%			2017	City Post Ltd	100%		0%		0%
Gannett Co, Inc		Gannett titles 100%		2014	ZZ Widely Held	100%		0%		0%
				2017	ZZ Widely Held	100%		0%		0%
Gazette Group	Lucan Gazette 100%	Dublin Gazette 100%		2014	D'Olier Investments Ltd	64%	Mary Leane	13%	Michael McGovern	12%
Newspapers Ltd	Coords Nove 4000/			2017 2014	Thomas Kelley	35% 55%	Mary Leane	25% 0%	Bill Kelley	20% 0%
Google Inc	Google News 100%			2014 2017	Larry Page & Sergey Brin Alphabet Inc	55% 100%		0%		0%
Guardian News		Guardian 100%		2017	Scott Trust	100%		0%		0%
and Media Ltd		Guardian 100%		2014	Scott Trust	100%		0%		0%
Heart Media Ltd		East Coast FM 47%		2017	Sean Ashmore	100%		0%		0%
		Last coast 1 W 4776		2014	Sean Ashmore	50%	Ciara O'Connor	50%		0%
Herald Printing		Tuam Herald 100%		2017	John Burke	46%	Mary Burke	36%	Alpha Publications Ltd	17%
& Publishing Co				2014	John Burke	40%	Mary Burke	36%	Alpha Publications Ltd	17%
Highcross	iRadio NE 47%			2014	John Mannion	99%	Highcross Holdings Ltd	1%	, upila i ubileutiono Etu	0%
Communications	iRadio NW 47%			2017	Highcross Holdings Ltd	100%		0%		0%
Highcross			iRadio NE 48%iRadio NW	2014	John MannionJohn	100%		0%		0%
Holdings Ltd			48%	2017	Mannion	100%		0%		0%



UHC	Lost outlets	Retained outlets	Acquired outlets		Shareholder 1		Shareholder 2		Shareholder 3	
Houses of the Oireachtas		Oireachtas TV 100%		2014 2017	Irish Government Irish Government	100% 100%		0% 0%		0% 0%
Independent Digital News and Media Ltd			Independent (UK) 100%	2017 2014 2017	[n/a] Evgeny Lebedev	100% 100% 47%	Sultan Muhammad Abuljadayel	0% 30%	Justin Shaw	0%
Independent Free Newspapers Group Ltd	Galway Independent 95%	Cork Independent 100%		2014 2017	Declan Dooley Jarlath Feeney	50% 100%	Jarlath Feeney	50% 0%		0% 0%
Independent News and Media PLC	Carlow People 100%	Argus 100% Bray People 100% Corkman 100% Drogheda Independent 100% Enniscorthy Guardian 100% Fingal Independent 100% Gorey Guardian 100% Herald 100% Independent.ie 100% Irish Daily Star 50% Irish Independent 100% Kerryman 100% New Ross Standard 100% Sligo Champion 100% Sunday Independent 100% Sunday World 100% Wexford People 100%	Buzz.ie 50%	2014 2017	Denis O'Brien Denis O'Brien	30% 30%	IIU Nominees [Dermot Desmond] IIU Nominees [Dermot Desmond]	15% 15%	Anthony O'Reilly (Sir) Farringdon	5% 6%
Independent Print Ltd	Independent (UK) 100%			2014 2017	Lebedev family Lebedev family	100% 100%		0% 0%		0% 0%
Informed Voice Media Ltd			Carlow People 100% Dublin Voice 100% Wicklow Voice 100%	2014 2017	[n/a] Graham O'Neill	100% 57%	Galmor Ltd	0% 31%	Maria Nulty	0% 13%
Irish Times Designated Activity Company		Irish Times 100%		2014 2017	Irish Times Trust Ltd Irish Times Trust Ltd	100% 100%		0% 0%		0% 0%
ITV plc		ITV 100%		2014 2017	Liberty Global Capital Group	6% 10%	Blackrock Liberty Global	5% 10%		0% 0%
Johnston Press PLC		Derry Journal 100%		2014 2017	Usaha Tegas [Ananda Krishnan] Custos Equity	19% 20%	Cazenove Capital Management Usaha Tegas [Ananda Krishnan]	8% 11%	Orbis Investment Management Ltd Crystal Amber Fund	8% 10%
Kennedy Echo Publishing Ltd		Echo (Dublin) 100%		2014 2017	Emma Kennedy Emma Kennedy	33% 33%	Peter Kennedy Peter Kennedy	33% 33%	Brenda Mockler Brenda Mockler	33% 33%
Kerry's Eye Ltd		Kerry's Eye 100%		2014 2017	Brendan Kennelly Brendan Kennelly	50% 50%	Padraig Kennelly Snr Padraig Kennelly Snr	50% 50%		0% 0%



UHC	Lost outlets	Retained outlets	Acquired outlets		Shareholder 1		Shareholder 2		Shareholder 3	
Landmark Media Investments	Enniscorthy Echo 100% Gorey Echo 100% New Ross Echo 100% Wexford Echo 100%	Beat FM 83% BreakingNews.ie 100% Evening Echo - Cork 100% Irish Examiner 100% Kildare Nationalist 100% Laois Nationalist 100% Nationalist - Carlow 100% Roscommon Herald 100% Waterford News and Star 100% Western People 100% WLR FM 75%		2014 2017	T & T Crosbie T & T Crosbie	100% 100%		0% 0%		0% 0%
Liberty Global		Virgin Media 100%	be3 100% TV3 100%	2014 2017	John Malone John Malone	28% 27%		0% 0%		0% 0%
Local Press Ltd	Clondalkin News 100% Lucan News 100% Rathcoole & Saggart News 100% Tallaght News 100%		10 100	2014 2017	Elizabeth Russell [n/a]	90% 100%	Anthony Russell	10% 0%		0% 0%
Mallcot II Ltd	, in the second s		Sunday Business Post 68%/53%	2014 2017	Elizabeth Russell [n/a]	90% 100%	Anthony Russell	10% 0%		0% 0%
Mallcot Ltd	Sunday Business Post 71%		00,00,00,00	2014 2017	Conor Killeen Conor Killeen	51% 51%	Mary Killeen Mary Killeen	49% 49%		0% 0%
Maximum Media Network Ltd	10317176	her.ie 100% joe.ie 100%		2017 2014 2017	Niall McGarry Niall McGarry	73% 50%	Jerry Flannery Jr First Names Trust Company (Ireland) Ltd	10% 26%	Gary Mernagh Jerry Flannery Jr	5% 13%
Mayo News (Holdings) Ltd		Mayo News 100%		2014 2017	Dermot Berry Dermot Berry	100% 100%		0% 0%		0% 0%
Media People Ireland Ltd		Roscommon People 100%		2014 2017	Fiona Healy Fiona Healy	50% 50%	Paul Healy Paul Healy	50% 50%		0% 0%
Mediaforce (Holdings) Ltd		Donegal Democrat 100% Donegal People's Press 100% Dundalk Democrat 100% Kilkenny People 100% Leinster Express 100% Leinster Leader 100% Limerick Chronicle 100% Limerick Leader 100% Longford Leader 100% Nationalist - Tipperary/Clonmel 100% Offaly Express 100% South Tipp Today 100% Tipperary Star 100%		2014 2017	Malcolm Denmark Malcolm Denmark	73% 73%	M P Young M P Young	21% 21%	K Denmark K Denmark	6% 6%
Microsoft Corp		MSN 100%		2014 2017	Vanguard Group Vanguard Group	5% 7%	State Street Blackrock	4% 4%	Capital World SSgA Funds Management	4% 4%
Midland Community Radio Services Ltd		Midlands 103 100%		2014 2017	Ray Tindle Ray Tindle	100% 100%		0% 0%		0% 0%



UHC	Lost outlets	Retained outlets	Acquired outlets		Shareholder 1		Shareholder 2		Shareholder 3	
Motoring Life Magazine Ltd			Clondalkin News 100%Lucan News 100%Rathcoole & Saggart News 100%Tallaght News 100%	2014 2017	Ann Garland John Russell	50% 50%	Mark Herbert Sarah Brooks	50% 50%		0% 0%
Nalac Ltd		Business Plus 100%		2014 2017	Nicholas Mulcahy Nicholas Mulcahy	89% 89%	Siobhan O'Connell Siobhan O'Connell	10% 10%	Ann O'Neill Ann O'Neill	1% 1%
Nals Ltd		East Cork Journal 100%		2014 2017	Louise Wilson Arnis Svageris	100% 100%		0% 0%		0% 0%
Nenagh Guardian Ltd		Nenagh Guardian 100%		2014 2017	Patrick Ryan Patrick Ryan	48%	Ann Spring Ann Spring	48% 48%	Mark Hassett Mark Hassett	3%
News Corporation		Irish Sun 100% Irish Sun on Sunday 100% Sunday Times 100% Times Ireland Edition 100%	C103 100% Cork's 96fm 100% Dublins Q102 100% FM104 100% Limerick's Live 95FM 100% LMFM 100%	2014 2017	Murdoch Family Murdoch Family	39% 39%		0% 0%		0% 0%
North Dublin Publications Ltd		Northside People East 100% Northside People West 100% Southside People 100%		2014 2017	Robin Webb David Mahon	64% 50%	Peter Butler Robin Webb	36% 50%		0% 0%
North West		Ocean FM 100%		2014	Padraig O'Dwyer	24%	Martin Reilly	15%	Tim Collins Tim Collins	15%
Broadcasting Ltd North Wicklow Times Ltd		Wicklow Times 100%		2017 2014 2017	Padraig O'Dwyer James Fitzmaurice James Fitzmaurice	24% 50% 50%	Martin Reilly Miriam Fitzmaurice Miriam Fitzmaurice	15% 50% 50%		15% 0% 0%
Drangold Ltd		Highland Radio 100%		2017 2014 2017	Gerry Rabbitt Gerry Rabbitt	66% 66%	Tim Rabbitt Tim Rabbitt	10% 10%	Maureen Rabbitt Maureen Rabbitt	10% 10%
Oriel Leader Ltd		Dundalk Leader 100%		2014 2017	Peter Keirans Peter Keirans	75% 75%	Viaduct Publishing Ltd Viaduct Publishing Ltd	25% 25%	Waareen habbitt	0%
Osnovina Ltd		Hot Press 100%		2017 2014 2017	Niall Stokes Niall Stokes	47%	Mairin Sheehy Mairin Sheehy	36% 36%	Jim Fitzpatrick Jim Fitzpatrick	5% 5%
Penfield Enterprises Ltd		Phoenix 100%		2017 2014 2017	Aengus Mulcahy Aengus Mulcahy	100% 100%	Brigid Mulcahy Brigid Mulcahy	0% 0%	Jim nepatiek	0% 0%
Radio Kerry Holdings Ltd		Northern Sound Radio 100% Radio Kerry 100% Shannonside 100%		2014 2017	Denis Kelliher Denis Kelliher	11% 11%	Halstead Enterprises Radio Phobail Chiarrai Teoaranta	11% 11%	Ardfert Christian Media Trust Ardfert Christian Media Trust	11% 11%
Reach PLC		Irish Daily Mirror 100% Irish Sunday Mirror 100%		2014 2017	ZZ Widely Held ZZ Widely Held	100% 100%		0% 0%		0% 0%
River Media Newspapers Ltd		Donegal Post 100% Finn Valley Post 100% Inish Times 100% Kildare Post 100% Letterkenny Post 100%		2014 2017	Fitzpatrick Family Fitzpatrick Family	75% 88%	Tim Collins Anne Sykes	13% 13%	Padraig O'Dwyer	13% 0%
RTÉ Group		RTÉ 100%		2014 2017	Irish Government Irish Government	100% 100%		0% 0%		0% 0%
Southern Star Ltd		Southern Star 100%		2014 2017	Lisa Collender Lisa Collender	20% 20%	Fiona Field Fiona Field	20% 20%	Breffni Horgan Breffni Horgan	20% 20%
Feilifís na Gaeilge		TG4 100%		2014 2017	Irish Government Irish Government	100% 100%		0% 0%		0%
Telegraph Media Group Ltd		Telegraph 100%		2017 2014 2017	Barclay Brothers Barclay Brothers	100% 100%		0% 0% 0%		076

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## **Outlets by Ultimate Holding Company**

UHC	Lost outlets	Retained outlets	Acquired outlets		Shareholder 1		Shareholder 2		Shareholder 3	
The Agricultural		Irish Farmers Journal 100%		2014	[n/a]	100%		0%	i	0%
Trust				2017	[n/a]	100%		0%		0%
The Connacht		Connacht Tribune 100%		2014	T I Naughton	30%	Peter Allen	15%	Brian O'Reilly	7%
Tribune Ltd		Galway Bay FM 100%		2017	J Naughton	30%	Peter Allen	15%	Brian O'Reilly	7%
The Munster		Munster Express 100%		2014	Keiran Walsh	80%	Priscilla Walsh	20%		0%
Express Ltd				2017	Keiran Walsh	83%	Priscilla Walsh	17%		0%
The New York		New York Times 100%		2014	Carlos Slim	17%		0%		0%
Times Company				2017	Carlos Slim	10%	Darsana Capital Partners	9%		0%
The Northern		Northern Standard, Monaghan		2014	Colette Smyth	20%	Cathal Smyth	9%	Ann Waterson	9%
Standard Ltd		100%		2017	Colette Smyth	20%	Cathal Smyth	9%	Ann Waterson	9%
The North-West		Donegal News 100%		2014	Austin Lynch	23%	Gerard Lynch	14%	Nora Egan	14%
of Ireland				2017	Nora Egan	15%	Gerard Lynch	14%	Veranne Lynch	12%
Printing &										
Publishing Co										
Ltd										
Time Warner		CNN 100%		2014	ZZ Widely Held	100%		0%		0%
				2017	ZZ Widely Held	100%		0%		0%
Tirconaill		Tirconaill Tribune 100%		2014	Francis Diver	50%	John McAteer	50%		0%
Tribune Ltd				2017	Francis Diver	50%	John McAteer	50%		0%
Tontine Rooms		Midland Tribune 100%		2014	John Taylor	33%	Robert Todd	30%	Mary Taylor	19%
Holding Co Ltd		Tullamore Tribune 100%		2017	John Taylor	33%	Robert Todd	30%	Mary Taylor	19%
Торіс		Athlone Topic 100%		2014	Richard Hogan	90%	Thomas Kiernan	10%		0%
Newspapers Ltd.		Meath Topic 100%		2017	Richard Hogan	90%	Thomas Kiernan	10%		0%
		Offaly Topic 100%								
TV3 Television	TV3 100%	Westmeath Topic 100%		2014	Tullamore Beta Ltd	100%		0%		0%
Network Ltd	103 100%			2014 2017	Liberty Global	100%		0%		0%
Verizon			Huffington Post 100%	2017	[n/a]	100%		0%		0%
Communications			Yahoo 100%	2014	ZZ Widely Held	100%		0%		0%
Inc			1000 100%	2017	22 Widely Held	100%		0%		0%
Viaduct		Drogheda Leader 100%		2014	Andrew Gates	50%	Desmond Grant	50%		0%
Publishing Ltd				2017	Andrew Gates	50%	Desmond Grant	50%		0%
Vienna		Cork's Red FM 69%		2014	Jim Mulqueen	50%	Deirdre Kiely	50%		0%
Investments				2017	Jim Mulqueen	50%	Michael Shelley	50%		0%
Voice Publishing		Finn Valley Voice 100%		2014	Eileen Griffin	25%	Celine McGlynn	25%	Catherine McGovern	25%
Company Ltd				2017	Eileen Griffin	25%	Celine McGlynn	25%	Catherine McGovern	25%
VSO Publications		Mallow Star 100%		2014	Mary Morrissey	50%	Jeremiah Morrissey	50%		0%
Ltd		Vale Star 100%		2017	Mary Morrissey	50%	Jeremiah Morrissey	50%		0%
		Weekly Observer 100%								
West Cork		West Cork People 100%		2014	Mary O'Brien	50%	Sheila Mullins	50%		0%
People Ltd				2017	Mary O'Brien	50%	Sheila Mullins	50%		0%
Wireless Group	be3 100%			2014	Fidelity Worldwide	10%	Old Mutual	6%	Blackrock	6%
Ltd	Cork's 96fm 100%			2017	News Corporation	100%		0%		0%
	C103 100%									
	Dublins Q102 100%									
	FM104 100%									
	Limerick's Live									
	95FM 100%									
Vahaalaa	LMFM 100%			2014	77 M/stab. U.a.d.	100%		00/		001
Yahoo Inc	Yahoo 100%			2014 2017	ZZ Widely Held Verizon Comms Inc	100% 100%		0% 0%		0% 0%
	1			2017	venzon comms inc	100%		0%		U%



We have identified 321 entities (both individuals and companies) which are 'top 3' shareholders in Irish media businesses, in 2014 and/or 2017. The following table provides the companies these 321 entities hold shares in, and the level of that shareholding. Where there has been a change in ownership the row is highlighted in red.

We also provide the media businesses *directly* owned by a company. For example, Denis O'Brien is shown as owning 100% of Communicorp, and against his entry in the database Today FM is shown as a Communicorp outlet, since it is 100% owned by that company. Against Communicorp's entry, that company's subsidiaries (such as European Radio Corp and Spin South West Ltd) are shown, and *their* respective directly owned outlets.



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
21st Century Fox	Sky plc	39%	Sky News	Sky plc	39%	Sky News
Active Link Co-operative Society	County Tipperary Radio Ltd	17%	Tipp FM	County Tipperary Radio Ltd	19%	Tipp FM
Adrian Acosta	Journal Media Ltd	3%	TheJournal.ie	Journal Media Ltd	3%	Fora.ie, TheJournal.ie
Aengus Mulcahy	Penfield Enterprises Ltd	100%	Phoenix	Penfield Enterprises Ltd	100%	Phoenix
Agora Holding				Agora SA	11%	Gazeta (Poland)
Alan Dunne	Fox Radio Ltd	15%				
Alpha Publications Ltd	Herald Printing and Publishing Co	17%	Tuam Herald	Herald Printing and Publishing Co	17%	Tuam Herald
Alphabet Inc				Google Inc	100%	Google News
Andrew Gates	Viaduct Publishing Ltd	50%	Drogheda Leader	Viaduct Publishing Ltd	50%	Drogheda Leader
Ann Garland	Motoring Life Magazine Ltd	50%				
Ann O'Neill	Nalac Ltd	1%	Business Plus	Nalac Ltd	1%	Business Plus
Ann Spring	Nenagh Guardian Ltd	48%	Nenagh Guardian	Nenagh Guardian Ltd	48%	Nenagh Guardian
Ann Waterson	The Northern Standard Ltd	9%	Northern Standard, Monaghan	The Northern Standard Ltd	9%	Northern Standard, Monaghan
Anne Sykes				River Media Newspapers Ltd	13%	Donegal Post, Finn Valley Post, Inish Times, Kildare Post, Letterkenny Post
Anthony O'Reilly (Sir)	Independent News and Media PLC	5%	Argus, Bray People, Carlow People, Corkman, Drogheda Independent, Enniscorthy Guardian, Fingal Independent, Gorey Guardian, Herald, Independent.ie, Irish Independent, Kerryman, New Ross Standard, Sligo Champion, Sunday Independent, Wexford People, Wicklow People			
Anthony Russell	Local Press Ltd	10%	Clondalkin News, Lucan News, Rathcoole & Saggart News, Tallaght News			
Ardfert Christian Media Trust	Radio Kerry Holdings Ltd	11%	Radio Kerry	Radio Kerry Holdings Ltd	11%	Radio Kerry
Arnis Svageris				Nals Ltd	100%	East Cork Journal
Austin Lynch	The North-West of Ireland Printing & Publishing Co Ltd	23%	Donegal News			
Baloughera Ltd				Dreamglade Ltd	18%	



**Big News Nettwork FZ-LLC** Bill Kelley Blackrock

Shareholder Barbara Tucker **Barclay Brothers** Bay Broadcasting Ltd

Breffni Horgan Brenda Mockler Brenda O'Neill Brendan Kennelly Brian Fallon Brian O'Reilly

Brigid Mulcahy Broadcast Investments Ltd Capital Group Capital Research & Management Co **Capital World Carlos Slim** Caroline Desmond Cathal Smyth Catherine McCafferty Catherine McGovern **Cazenove** Capital Management Celine McGlvnn

Chris Carroll
Christopher Dineen
Ciara O'Connor
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	2014
Entity	Holding
Eagle Island Holdings	33%
Telegraph Media Group Ltd	100%
Choice Broadcasting Ltd	99%
Classic Rock Broadcasting Ltd	37%
Star Broadcasting Ltd	46%
Wilton Radio Ltd	9%
ITV plc	5%
Sky plc	5%
Wireless Group Ltd	6%
Southern Star Ltd	20%
Kennedy Echo Publishing Ltd	33%
Donegal Daily Ltd	50%
Kerry's Eye Ltd	50%
DML Capital Ltd	50%
The Connacht Tribune Ltd	7%
Penfield Enterprises Ltd	0%
Star Broadcasting Ltd	46%
Microsoft Corp	4%
The New York Times Company	17%
Ronmall Unlimited Company	72%
The Northern Standard Ltd	9%
Courier Publications Ltd	50%
Voice Publishing Company Ltd	25%
Johnston Press PLC	8%
Voice Publishing Company Ltd	25%
County Mayo Radio Ltd	29%
Cork News and Media Ltd	10%
Broadcast Investments Ltd	50%

014	
Holding	Directly owned Outlets
33%	
100%	Telegraph
99%	4FM
37%	Radio Nova
46%	Sunshine 106.8FM
9%	iRadio NE, iRadio NW
5%	ITV
5%	Sky News
6%	be3, C103, Dublins Q102, FM104, Limerick's Live 95FM, LMFM
20%	Southern Star
33%	Echo (Dublin)
50%	Donegal Daily
50%	Kerry's Eye
50%	
7%	Connacht Tribune, Galway Bay FM
0%	Phoenix
46%	Sunshine 106.8FM
4%	MSN
17%	New York Times
72%	
9%	Northern Standard, Monaghan
50%	Clare Courier
25%	Finn Valley Voice
8%	Derry Journal

6	Finn Valley Voice	
6	Mid West Radio	
6	Cork News	
6		

	2017	
Entity	Holding	Directly owned Outlets
Eagle Island Holdings	33%	
Telegraph Media Group Ltd	100%	Telegraph
Choice Broadcasting Ltd	99%	4FM
Classic Rock Broadcasting Ltd	38%	Radio Nova
Star Broadcasting Ltd	46%	Sunshine 106.8FM
Wilton Radio Ltd	10%	iRadio NE, iRadio NW
Gazette Group Newspapers Ltd	20%	Dublin Gazette
Microsoft Corp	4%	MSN

Southern Star Ltd	20%	Southern Star
Kennedy Echo Publishing Ltd	33%	Echo (Dublin)
Donegal Daily Ltd	50%	Donegal Daily
Kerry's Eye Ltd	50%	Kerry's Eye
DML Capital Ltd	50%	
The Connacht Tribune Ltd	7%	Connacht Tribune, Galway Bay FM
Penfield Enterprises Ltd	0%	Phoenix
Star Broadcasting Ltd	46%	Sunshine 106.8FM
ITV plc	10%	ITV
21st Century Fox	10%	Fox News

The New York Times Company	10%	New York Times
The Northern Standard Ltd	9%	Northern Standard, Monaghan
Courier Publications Ltd	50%	Clare Courier
Voice Publishing Company Ltd	25%	Finn Valley Voice
Voice Publishing Company Ltd	25%	Finn Valley Voice
County Mayo Radio Ltd	29%	Mid West Radio
Heart Media Ltd	50%	

		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
City Post Ltd				Galmor Ltd	100%	Waterford Today
Clare Champion Ltd	Fuinseog Holdings Ltd	18%		Fuinseog Holdings Ltd	18%	
Clare Community Radio Holdings PLC	Dreamglade Ltd	45%		Dreamglade Ltd	48%	
	Spin South West Ltd	15%	Spin South West	Spin South West Ltd	15%	Spin South West
Clem Ryan				Co. Kildare FM Radio Ltd	10%	KFM
				County Kildare Broadcasting Ltd	25%	
Co Op Society Ltd Aurivo				County Mayo Radio Ltd	27%	Mid West Radio
Colette Smyth	The Northern Standard Ltd	20%	Northern Standard, Monaghan	The Northern Standard Ltd	20%	Northern Standard, Monaghan
Colm Nagle	C. & L. Publications Ltd	50%	Dungarvan Leader	C. & L. Publications Ltd	50%	Dungarvan Leader
Comcast				BuzzFeed Inc	25%	Buzzfeed
Communicorp	Dublin Rock Radio Ltd	34%	TX FM 105.2	European Radio Corporation Ltd	83%	
	European Radio Corporation Ltd	83%		Spin South West Ltd	55%	Spin South West
	Spin South West Ltd	45%	Spin South West			
Community Newspapers Ltd	Galway Advertiser Ltd	94%	Athlone Advertiser, Galway Advertiser, Mayo Advertiser, Mullingar Advertiser	Galway Advertiser Ltd	84%	Athlone Advertiser, Galway Advertiser, Mayo Advertiser, Mullingar Advertiser
Conor Killeen	Mallcot Ltd	51%		Mallcot Ltd	51%	
	Mallcot II Ltd	60%		Mallcot II Ltd	100%	
Corrmuda Ltd	Filbeck Ltd	33%		Filbeck Ltd	33%	
County Kildare Broadcasting Ltd	Co. Kildare FM Radio Ltd	20%	KFM	Co. Kildare FM Radio Ltd	<b>59%</b>	KFM
County Media Ltd	Radio County Sound Ltd	100%		Radio County Sound Ltd	100%	
Crystal Amber Fund				Johnston Press PLC	10%	Derry Journal
Custos Equity				Johnston Press PLC	20%	Derry Journal
Dackar Ltd				Jarls Investments Ltd	100%	
Damian Dowds	D & D Media Ltd	30%	Inishowen Independent	D & D Media Ltd	30%	Inishowen Independent
Daniel Carey	Cork News and Media Ltd	80%	Cork News			
Daniel Healy	Irish Radio & Media Holdings Ltd	33%		Irish Radio & Media Holdings Ltd	33%	
Darsana Capital Partners				The New York Times Company	9%	New York Times
Datascope Ltd	Sligo Weekender Ltd	100%	Sligo Weekender	Sligo Weekender Ltd	100%	Sligo Weekender
David Galvin	Fuinseog Holdings Ltd	18%		Fuinseog Holdings Ltd	18%	
David Mahon				North Dublin Publications Ltd	50%	Northside People East, Northside People West, Southside People
David Mongey	Co. Kildare FM Radio Ltd	14%	KFM	Co. Kildare FM Radio Ltd	14%	KFM



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
	County Kildare Broadcasting Ltd	18%		County Kildare Broadcasting Ltd	35%	
Deborah Fagan	Irish Radio & Media Holdings Ltd	33%		Irish Radio & Media Holdings Ltd	33%	
Deborah Kelly	Jarls Investments Ltd	33%				
Declan Dooley	Independent Free Newspapers Group Ltd	50%				
Declan Heavey	Yeoman International Group Ltd	0%		Yeoman International Group Ltd	0%	
Deirdre Kiely	Vienna Investments	50%				
Denis Desmond	Ronmall Unlimited Company	28%				
Denis Kelliher	Radio Kerry Holdings Ltd	11%	Radio Kerry	Radio Kerry Holdings Ltd	11%	Radio Kerry
Denis O'Brien	Communicorp	100%	Today FM	Communicorp	100%	Today FM
	Independent News and Media PLC	30%	Argus, Bray People, Carlow People, Corkman, Drogheda Independent, Enniscorthy Guardian, Fingal Independent, Gorey Guardian, Herald, Independent.ie, Irish Independent, Kerryman, New Ross Standard, Sligo Champion, Sunday Independent, Wexford People, Wicklow People	Independent News and Media PLC	30%	Argus, Bray People, Corkman, Drogheda Independent, Enniscorthy Guardian, Fingal Independent, Gorey Guardian Herald, Independent.ie, Irish Independent, Kerryman, New Ross Standard, Sligo Champion, Sunday Independent, Wexford People Wicklow People
Dermot Berry	Mayo News (Holdings) Ltd	100%	Mayo News	Mayo News (Holdings) Ltd	100%	Mayo News
Dermot Weld	Co. Kildare FM Radio Ltd	39%	KFM			
	County Kildare Broadcasting Ltd	49%				
Desmond Grant	Viaduct Publishing Ltd	50%	Drogheda Leader	Viaduct Publishing Ltd	50%	Drogheda Leader
Desmond Whelan	South East Broadcasting Co Ltd	25%	WLR FM	South East Broadcasting Co Ltd	25%	WLR FM
	WKW FM Ltd	17%	Beat FM	WKW FM Ltd	17%	Beat FM
DMGT plc	DMG Ireland	100%				
DML Capital Ltd	Journal Media Ltd	93%	TheJournal.ie	Journal Media Ltd	89%	Fora.ie, TheJournal.ie
D'Olier Investments Ltd	Gazette Group Newspapers Ltd	64%	Dublin Gazette, Lucan Gazette			
Domhnal Slattery	Clare College News Ltd	100%	Clare People	Clare College News Ltd	100%	Clare People
Donagh O'Doherty				Sunrise Media Ltd	10%	
Donal Campbell	D & D Media Ltd	30%	Inishowen Independent	D & D Media Ltd	30%	Inishowen Independent
Dreamglade Ltd	County Tipperary Radio Ltd	56%	Tipp FM	County Tipperary Radio Ltd	71%	Tipp FM
Dunfermline Press	Celtic Media Group	10%				
Eamon Buttle	Filbeck Ltd	33%		Filbeck Ltd	33%	



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Eamonn Fallon	DML Capital Ltd	50%		DML Capital Ltd	50%	
East Coast Radio Ltd	Broadcast Investments Ltd	25%				
	County Kildare Broadcasting Ltd	13%				
Eileen Griffin	Voice Publishing Company Ltd	25%	Finn Valley Voice	Voice Publishing Company Ltd	25%	Finn Valley Voice
Elizabeth Russell	Local Press Ltd	90%	Clondalkin News, Lucan News, Rathcoole & Saggart News, Tallaght News			
Emma Kennedy	Kennedy Echo Publishing Ltd	33%	Echo (Dublin)	Kennedy Echo Publishing Ltd	33%	Echo (Dublin)
Enagh Lane Invesments Ltd				KC II Ltd	7%	
Estate of Deirdre Romanes	Celtic Media Group	51%				
Ethel Walsh				County Tipperary Radio Ltd	6%	Tipp FM
Eugene McCafferty	Courier Publications Ltd	50%	Clare Courier	Courier Publications Ltd	50%	Clare Courier
European Radio Corporation Ltd	Radio Two Thousand Ltd	100%	98FM, Spin 1038	Radio Two Thousand Ltd	100%	98FM, Spin 1038
Evgeny Lebedev				Independent Digital News and Media Ltd	47%	Independent (UK)
Express Newspapers	Independent Star Ltd	50%	Irish Daily Star	Independent Star Ltd	50%	Buzz.ie, Irish Daily Star
Farringdon				Independent News and Media PLC	6%	Argus, Bray People, Corkman, Drogheda Independent, Enniscorthy Guardian, Fingal Independent, Gorey Guardian, Herald, Independent.ie, Irish Independent, Kerryman, New Ross Standard, Sligo Champion, Sunday Independent, Wexford People Wicklow People
Fessenden Ltd				East Coast Radio Ltd	47%	East Coast FM
Fidelity Worldwide	Wireless Group Ltd	10%	be3, C103, Dublins Q102, FM104, Limerick's Live 95FM, LMFM			
Filbeck Ltd	Corrmuda Ltd	32%	South East Radio	Corrmuda Ltd	32%	South East Radio
Fiona Darcy	Siteridge Ltd	6%	Cork's Red FM	Siteridge Ltd	6%	Cork's Red FM
Fiona Field	Southern Star Ltd	20%	Southern Star	Southern Star Ltd	20%	Southern Star
Fiona Healy	Media People Ireland Ltd	50%	Roscommon People	Media People Ireland Ltd	50%	Roscommon People



		2014			2017	
Shareholder First Names Trust Company (Ireland) Ltd	Entity	Holding	Directly owned Outlets	Entity Maximum Media Network Ltd	Holding <mark>26%</mark>	Directly owned Outlets her.ie, joe.ie
Fitzpatrick Family	River Media Newspapers Ltd	75%	Donegal Post, Finn Valley Post, Inish Times, Kildare Post, Letterkenny Post	River Media Newspapers Ltd	88%	Donegal Post, Finn Valley Post, Inish Times, Kildare Post, Letterkenny Post
Francis Diver	Tirconaill Tribune Ltd	50%	Tirconaill Tribune	Tirconaill Tribune Ltd	50%	Tirconaill Tribune
Frank Long	Celtic Media Ltd	26%	Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner, Westmeath Independent	Celtic Media Ltd	27%	Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner, Westmeath Independent
Frank Mulrennan	Celtic Media Ltd	36%	Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner, Westmeath Independent	Celtic Media Ltd	38%	Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner, Westmeath Independent
Frontline Asset Management Ltd	Benster Ltd	99%		Benster Ltd	99%	
Fuinseog Holdings Ltd	Clare Champion Ltd	100%	Clare Champion	Clare Champion Ltd	100%	Clare Champion
Gael Linn	Clare Community Radio Holdings PLC	8%	Clare FM	Clare Community Radio Holdings PLC	8%	Clare FM
Gaiety Investments Group Holdings Ltd	Gaiety Investments Unlimited Company	100%				
Gaiety Investments Jersey Unlimited	Gaiety Investments Unlimited Company	0%				
Gaiety Investments Unlimited Company	Dublin Rock Radio Ltd	33%	TX FM 105.2			
Galmor Ltd				Informed Voice Media Ltd	31%	Carlow People, Dublin Voice, Wicklow Voice
Galvin, Anthony	Clare Community Radio Holdings PLC	6%	Clare FM	Clare Community Radio Holdings PLC	6%	Clare FM
Gary Mernagh	Maximum Media Network Ltd	5%	her.ie, joe.ie			
Gerald Flanagan	Flanagan Print & Graphics Ltd	50%	Youghal News	Flanagan Print & Graphics Ltd	50%	Youghal News
Gerard Lynch	The North-West of Ireland Printing & Publishing Co Ltd	14%	Donegal News	The North-West of Ireland Printing & Publishing Co Ltd	14%	Donegal News
Gerry Rabbitt	Orangold Ltd	66%		Orangold Ltd	66%	
Golden Vale Investments Ltd	Clare Community Radio Holdings PLC	8%	Clare FM	Clare Community Radio Holdings PLC	8%	Clare FM



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Graham O'Neill				Informed Voice Media Ltd	57%	Carlow People, Dublin Voice, Wicklow Voice
Halstead Enterprises	Radio Kerry Holdings Ltd	11%	Radio Kerry			
Heart Media Ltd	East Coast Radio Ltd	78%	East Coast FM	Broadcast Investments Ltd	100%	
				Fessenden Ltd	100%	
Highcross Communications Ltd	Wilton Radio Ltd	47%	iRadio NE, iRadio NW	Wilton Radio Ltd	48%	iRadio NE, iRadio NW
Highcross Holdings Ltd	Highcross Communications Ltd	1%		Highcross Communications Ltd	100%	
Howard Block	Fox Radio Ltd	43%				
Hyper Trust Ltd	News 106 Ltd	19%	Newstalk	News 106 Ltd	19%	Newstalk
lain Romanes	Celtic Media Group	27%				
lan Glass	City Post Ltd	0%		City Post Ltd	0%	
				Dackar Ltd	71%	
IIU Nominees [Dermot Desmond]	Independent News and Media PLC	15%	Argus, Bray People, Carlow People, Corkman, Drogheda Independent, Enniscorthy Guardian, Fingal Independent, Gorey Guardian, Herald, Independent.ie, Irish Independent, Kerryman, New Ross Standard, Sligo Champion, Sunday Independent, Wexford People, Wicklow People	Independent News and Media PLC	15%	Argus, Bray People, Corkman, Drogheda Independent, Enniscorthy Guardian, Fingal Independent, Gorey Guardian, Herald, Independent.ie, Irish Independent, Kerryman, New Ross Standard, Sligo Champion, Sunday Independent, Wexford People, Wicklow People
Independent Communications	Independent Star Ltd	50%	Irish Daily Star			
Independent Free Newspapers Group Ltd	Cork Independent Newspapers Ltd	100%	Cork Independent	Cork Independent Newspapers Ltd	100%	Cork Independent
	Galway Independent Newspapers Ltd	95%	Galway Independent			
Independent News and Media PLC	CK Broadcasting Ltd	12%	KCLR 96FM	CK Broadcasting Ltd	12%	KCLR 96FM
	Independent Newspapers (Ireland) Ltd	100%		Independent Newspapers (Ireland) Ltd	100%	
	INM Regionals Ltd	100%		Independent Star Ltd	50%	Buzz.ie, Irish Daily Star
	Sunday Newspapers Ltd	100%	Sunday World	INM Regionals Ltd	100%	
				Sunday Newspapers Ltd	100%	Sunday World
Independent Newspapers (Ireland) Ltd	Independent Communications	100%				



Entity

Houses of the Oireachtas

CK Broadcasting Ltd

Shareholder Irish Government

Irish Radio & Media Holdings Ltd Irish Times Trust Ltd

#### J Naughton

James Fitzmaurice James Lynch Jarlath Feeney

Jarls Investments Ltd Jeremiah Morrissey

#### Jerry Flannery Jr

Jim Fitzpatrick Jim McGettigan Jim Mulqueen JKMS Holdings Ltd

#### Joe Hynes

John Burke	
John Connolly	
John Galvin	
John Killeen	
John Malone	
John Mannion	

John McAteer John Morrissey John Purcell

RTÉ Group	100%	RTÉ
Teilifís na Gaeilge	100%	TG4
CK Broadcasting Ltd	17%	KCLR 96FM
Irish Times Designated Activity Company	100%	Irish Times
North Wicklow Times Ltd	50%	Wicklow Times
Dungarvan Observer Ltd	90%	Dungarvan Observer
Independent Free Newspapers Group Ltd	50%	
City Post Ltd	100%	
VSO Publications Ltd	50%	Mallow Star, Vale Star, Weekly Observer
Maximum Media Network Ltd	10%	her.ie, joe.ie
Osnovina Ltd	5%	Hot Press
East Coast Radio Ltd	13%	East Coast FM
Vienna Investments	50%	
Herald Printing and Publishing Co	46%	Tuam Herald
The Connaught Telegraph Ltd	67%	
Fuinseog Holdings Ltd	63%	
KC II Ltd	55%	
Liberty Global	28%	Virgin Media
Highcross Communications Ltd	99%	
Highcross Holdings Ltd	100%	
Tirconaill Tribune Ltd	50%	Tirconaill Tribune
Galmor Ltd	2%	Waterford Today

2014

Holding

100%

20%

KCLR 96FM

Directly owned Outlets Oireachtas TV

	2017	
Entity Houses of the Oireachtas	Holding 100%	Directly owned Outlets Oireachtas TV
RTÉ Group	100%	RTÉ
Teilifís na Gaeilge	100%	TG4
CK Broadcasting Ltd	17%	KCLR 96FM
Irish Times Designated Activity Company	100%	Irish Times
The Connacht Tribune Ltd	30%	Connacht Tribune, Galway Bay FM
North Wicklow Times Ltd	50%	Wicklow Times
Dungarvan Observer Ltd	90%	Dungarvan Observer
Independent Free Newspapers Group Ltd	100%	
City Post Ltd	100%	
VSO Publications Ltd	50%	Mallow Star, Vale Star, Weekly Observer
Maximum Media Network Ltd	13%	her.ie, joe.ie
Osnovina Ltd	5%	Hot Press
East Coast Radio Ltd	13%	East Coast FM
Vienna Investments	50%	
KC II Ltd	29%	
Community Newspapers Ltd	7%	
Galway Advertiser Ltd	5%	Athlone Advertiser, Galway Advertiser, Mayo Advertiser, Mullingar Advertiser
Herald Printing and Publishing Co	46%	Tuam Herald
Fuinseog Holdings Ltd	51%	
Liberty Global	27%	Virgin Media
Highcross Holdings Ltd	100%	
Tirconaill Tribune Ltd	50%	Tirconaill Tribune
CK Broadcasting Ltd	20%	KCLR 96FM



[71]

John Russell  Motoring Life Magazine Ltd  50%  Clondalkin News, Lucan News, Rathooke & Saggart News, Tallaght News    John Sheridan  KC II Ltd  3%  Limerick Post    John Sheridan  KC II Ltd  3%  Tontine Rooms Holding Co Ltd  33%    Johnston Press PLC  Johnston Press Ireland Ltd  100%  Tontine Rooms Holding Co Ltd  33%    Johnston Press PLC  Johnston Press Ireland Ltd  100%  Celtic Media Ltd  10%    Johnston Press PLC  Johnston Press Ireland Ltd  100%  Celtic Media Ltd  14%  Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Independent  20%  Independent (UK)    KC II Ltd  Post Publications Ltd  12%  Sunday Business Post  Sunday Business Post    KC II Ltd  Post Publications Ltd  12%  Sunday Business Post  Sunds Media Ltd  6%    Keith Wood  Muland Radio Group Ltd  10%  Northern Sound Radio, Shannonside  Spin South West Ltd  100%    Keith Wood  Midland Radio Group Ltd  6%  Exerce Ltd  6%  Spin South West Ltd    Keith Wood  Midland Radio Group Ltd  6%  Exerce Ltd  6%  Spin South West Ltd <th></th> <th></th> <th>2014</th> <th></th> <th></th> <th>2017</th> <th></th>			2014			2017	
King Handan  King Hund  King Hund  King Hund    Johnston Press Fledand Ltd  33%  Johnston Press Fledand Ltd  33%    Johnston Press Fledand Ltd  100%  Johnston Press Fledand Ltd  33%    Johnston Press Fledand Ltd  100%  Johnston Press Fledand Ltd  10%    Johnston Press Fledand Ltd  10%  Anglo Celt, Connaught  Celtic Media Ltd  14%  Anglo Celt, Connaught    Johnston Press Fledand Ltd  10%  Keine Konners, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Saminer, Westmeath	Shareholder John Russell	Entity	Holding	Directly owned Outlets			Clondalkin News, Lucan News, Rathcoole & Saggart News,
John Saylor  Tontine Rooms Holding Co Ltd  33%  Tontine Rooms Holding Co Ltd  33%    Johnston Press Feland Ltd  100%  Johnston Press Feland Ltd  100%    Johnston Press Feland Ltd  100%  Cellic Media Ltd  10%    Lonathan Wood  Cellic Media Ltd  13%  Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Isaminer, Westmeath Isaminer,  Cellic Media Ltd  10%  Anglo Celt, Connaught Telegraph, Meath Chronicle, Offaly Independent, Westmeath Independent    Journal Media Nominees  Cellic Media Ltd  6%  Fora.le, TheJournal.le    Kt I Ltd  Mediaforce (Holdings) Ltd  6%  Independent Digital News and Media Itd  6%    Kt I Ltd  Post Publications Ltd  12%  Sunday Business Post  Independent Ltd  6%    Keira Malsh  Mediaforce (Holdings) Ltd  6%  Sunise Media Ltd  68%    Keira Malsh  Midland Radio Group Ltd  100%  Northern Sound Radio, Shannonside  Spin South West Itd    Keira Midan  Bay Broadcasting Ltd  50%  Evening Echo - Cork, Irish Paramer Publications (Cork) Ltd  10%    Keira Midan  Starting Echo - Cork, Irish Paramer Publications (Cork) Ltd  100%  Kildare Nationalist, Staionalist - Carlow    Keiri Midan  Stering Ethol  100%  Kildare Nationalist - Carlow  10%	John Ryan	Carnbeg Ltd	3%	Limerick Post			
Johnston Press PLC      Johnston Press Ireland Ltd      100%      Johnston Press Ireland Ltd      100%        Loonathan Wood      Celtic Media Ltd      13%      Anglo Celt, Connaught Telegraph, Meath Chronicle, O'flay independent, Westmeath Examiner, Westmeath Independent      Celtic Media Ltd      14%      Anglo Celt, Connaught Telegraph, Meath Chronicle, O'flay independent, Westmeath Examiner, Westmeath Independent      Celtic Media Ltd      14%      Anglo Celt, Connaught Telegraph, Meath Chronicle, O'flay independent, Westmeath Examiner, Westmeath Independent      Journal Media Ltd      6%      Forale, TheJournal Lee Orale, TheJournal Lee Orale, TheJournal Lee Media force (Holdings) Ltd      6%      Independent Digital News and Media Itd      6%      Forale, TheJournal Lee Orale, TheJournal Lee Orale, TheJournal Lee Media Itd      6%      Forale, TheJournal Lee Orale, TheJournal Lee Orale, TheJournal Lee Orale, TheJournal Kedia Ltd      6%      Forale, TheJournal Lee Orale, TheJournal Kedia Ltd      6%      Forale, TheJournal Lee Orale, TheJournal Kedia Ltd      6%      Forale, TheJournal Kedia Ltd      6%      Sunday Business Post      Sunday Bus	John Sheridan	KC II Ltd	4%				
ionathan Wood  Celtic Media Ltd  13%  Anglo Celt, Connaught Telegraph, Meash Chronicle, Offay Independent, Westmeath Examiner, Westmeath Examiner, Westmeath Independent, Westmeath Independent Independent Digital News and Norther Sound Radio, Shannonside  20%  Independent U(x)    Kein Wash Kein Wash Kein Branigan  Midland Radio Group Ltd  100%  Norther Sound Radio, Shannonside  Shannonside    Bay Broadcasting Ltd  50%  Examiner  Examiner, Examiner Publications (Cork) Ltd  100%  Fereing Echo - Cork, Irish Examiner    Irish Examiner Ltd  100%  Kildare Nationalist, Laois Nationalist, Nationalist - Cariow  Nationalist A	John Taylor	Tontine Rooms Holding Co Ltd	33%		Tontine Rooms Holding Co Ltd	33%	
Independent, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Examiner, Westmeath Independent, WestMedia Itd    Journal Media Itd    Gene    Independent (Uk), Media Itd    Media Itd    Media Itd    Media Itd    Gene    Independent (Uk), Media Itd    Media Itd    Gene    Independent, WestMedia Itd    Geneint, Secondia Itd    Gene	Johnston Press PLC	Johnston Press Ireland Ltd	100%		Johnston Press Ireland Ltd	100%	
itid    Media force (Holdings) Ltd    Media force (Holdings	Jonathan Wood	Celtic Media Ltd	13%	Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner,	Celtic Media Ltd	14%	Telegraph, Meath Chronicle, Offaly Independent, Westmeath Examiner,
K Demark    Media force (Holdings) Ltd    6%    Media force (Holdings) Ltd    6%      KC II Ltd    Post Publications Ltd    12%    Sunday Business Post    Sunrise Media Ltd    68%      KC II Ltd    Rost Publications Ltd    80%    Munster Express    Sunrise Media Ltd    68%      Keirin Walsh    The Munster Express Ltd    80%    Munster Express    83%    Munster Express      Keirin Walsh    Midland Radio Group Ltd    100%    Northern Sound Radio, Shannonside    Midland Radio Group Ltd    100%    Northern Sound Radio, Shannonside      Kevin Branigan    Bay Broadcasting Ltd    60%    Eagy Broadcasting Ltd    60%    Sinanonside      Kyran MCStay    Catscope Ltd    60%    Examiner Publications (Cork) Ltd    100%    Ferening Echo Ltd    60%    Evening Echo Ltd    60%    Evening Echo - Cork, Irish    Irish Examiner    Irish Examiner    Irish Examiner    Irish Examiner    Nationalist, Laois    Nationalist, Leinster Times Ltd    100%	Journal Media Nominees Ltd				Journal Media Ltd	6%	Fora.ie, TheJournal.ie
KC II Ltd    Post Publications Ltd    12%    Sunday Business Post    Sunrise Media Ltd    68%      Keiran Walsh    The Munster Express Ltd    80%    Munster Express    5pin South West      Keiran Walsh    Midland Radio Group Ltd    100%    Northern Sound Radio, Shannonside    Spin South West Ltd    10%    Spin South West      Kevin Branigan    Bay Broadcasting Ltd    50%    Bay Broadcasting Ltd    50%    Bay Broadcasting Ltd    50%      Kevin Mitchell    Datascope Ltd    60%    Examiner Publications (Cork) Ltd    10%    Ferning Echo - Cork, Irish Examiner    Datascope Ltd    60%    Evening Echo - Cork, Irish Examiner    Firish Examiner    100%    Evening Echo - Cork, Irish Examiner    100%    Kildare Nationalist, Laois Nationalist, Nationalist, Carlow    Irish Examiner    100%    Kildare Nationalist, Laois Nationalist, Nationalist - Carlow    Nationalist & Leinster Times Ltd    100%    Kildare Nationalist, Laois Nationalist, Nationalist - Carlow    Roscommon Herald Ltd    100%    Roscommon Herald      Siteridge Ltd    17%    Cork's Red FM    South East Broadcasting Co Ltd    10%    Roscommon Herald      Siteridge Ltd    17%    Cork's Red FM    South East Broadcasting Co Ltd    75%    WL	Justin Shaw					20%	Independent (UK)
Keiran Walsh Keith WoodThe Munster Express Ltd80%Munster ExpressThe Munster Express Ltd83%Munster ExpressKeith WoodMidland Radio Group Ltd100%Northern Sound Radio, ShannonsideSpin South West Ltd100%Spin South WestKevin BraniganBay Broadcasting Ltd50%Midland Radio Group Ltd100%Northern Sound Radio, ShannonsideBay Broadcasting Ltd50%Kevin Mitchell Kyran McStayDatascope Ltd60%Bay Broadcasting Ltd50%Kandmark Media InvestmentsExaminer Publications (Cork) Ltd100%Evening Echo - Cork, Irish ExaminerDatascope Ltd60%Irish Examiner Ltd100%Evening Echo - Cork, Irish Examiner100%Kildare Nationalist, Laois Nationalist, Laois Nationalist, Carlow100%Kildare Nationalist, Laois Nationalist, CarlowRoscommon Herald Ltd100%Roscommon Herald100%Roscommon Herald Ltd100%Roscommon HeraldSouth East Broadcasting Co Ltd7%WLR FMSouth East Broadcasting Co Ltd7%WLR FM	K Denmark	Mediaforce (Holdings) Ltd	6%		Mediaforce (Holdings) Ltd	6%	
Keith Wood    Midland Radio Group Ltd    100% Northern Sound Radio, Shannonside    Spin South West Ltd    100% Northern Sound Radio, Shannonside      Kevin Paraigan    Bay Broadcasting Ltd    60%    Bay Broadcasting Ltd    50%      Kevin Mitchell    Datascope Ltd    60%    Bay Broadcasting Ltd    60%    Datascope Ltd    60%    East Broadcasting Ltd    100%    Evening Echo - Cork, Irish Examiner    Evening Echo - Cork, Irish Examiner    100%    Kildare Nationalist, Laois Nationalist, Laois Nationalist, Laois Nationalist, Laois Nationalist - Carlow    Nationalist, Nationalist - Carlow    Nationalist & Leinster Times Ltd    100%    Kildare Nationalist - Carlow    Roscommon Herald Ltd    100%    Roscommon Herald	KC II Ltd	Post Publications Ltd	12%	Sunday Business Post	Sunrise Media Ltd	68%	
Kerry Acquisitions Ltd    Midland Radio Group Ltd    100%    Northern Sound Radio, Shannonside    Midland Radio Group Ltd    100%    Northern Sound Radio, Shannonside      Kevin Branigan    Bay Broadcasting Ltd    50%    Bay Broadcasting Ltd    50%      Kevin Mitchell    Datascope Ltd    60%    Bay Broadcasting Ltd    50%      Kevin Mitchell    Datascope Ltd    60%    Datascope Ltd    60%      Kyran McStay    KC II Ltd    36%    Examiner Publications (Cork) Ltd    100%    Keving Echo - Cork, Irish      Investments    Fish Examiner Ltd    100%    Evening Echo - Cork, Irish Examiner    Evening Echo - Cork, Irish Examiner    100%    Irish Examiner      Nationalist, & Leinster Times Ltd    100%    Kildare Nationalist, Laois Nationalist, Nationalist - Carlow    Nationalist, Nationalist - Carlow    Nationalist, Nationalist - Carlow      Roscommon Herald Ltd    100%    Roscommon Herald Ltd    100%    Roscommon Herald Ltd    10%    Roscommon Herald      South East Broadcasting Co Ltd    75%    WLR FM    South East Broadcasting Co Ltd    75%    WLR FM	Keiran Walsh	The Munster Express Ltd	80%	Munster Express	The Munster Express Ltd	83%	Munster Express
Kevin Branigan    Bay Broadcasting Ltd    50%    Bay Broadcasting Ltd    50%    Bay Broadcasting Ltd    50%    Eanononide      Kevin Mitchell    Datascope Ltd    60%    Eandmark Media    100%    Examiner Publications (Cork) Ltd    100%    Evening Echo - Cork, Irish    Evening Echo - Cork, Irish    Irish Examiner Ltd    100%    Evening Echo - Cork, Irish    Irish Examiner Ltd    100%    Kildare Nationalist, Laois    Nationalist & Leinster Times Ltd    100%    Kildare Nationalist - Carlow    Nationalist, Nationalist - Carlow    Roscommon Herald Ltd    100%    Roscommon Herald Ltd    10%    Roscommon Hera	Keith Wood				Spin South West Ltd	10%	Spin South West
Kevin Mitchell    Datascope Ltd    60%    Datascope Ltd    60%      Kyran McStay    KC II Ltd    36%    Datascope Ltd    60%    Evening Echo Ltd    100%    Evening Echo - Cork    Investments    Irish Examiner Publications (Cork) Ltd    100%    Evening Echo - Cork, Irish    Evening Echo - Cork, Irish    Evening Echo - Cork, Irish    Investments    Irish Examiner Ltd    100%    Kildare Nationalist, Laois    Nationalist & Leinster Times Ltd    100%    Kildare Nationalist - Carlow    Nationalist, Nationalist - Carlow    Nationalist & Leinster Times Ltd    100%    Roscommon Herald Ltd    100%    Roscommon Herald Ltd    100%    Roscommon Herald Ltd    100%    Roscommon Herald      South East Broadcasting Co Ltd    75%    WLR FM    South East Broadcasting Co Ltd    75%    WLR FM	Kerry Acquisitions Ltd	Midland Radio Group Ltd	100%		Midland Radio Group Ltd	100%	,
KC II Ltd    36%      Landmark Media Investments    Examiner Publications (Cork) Ltd    100%    Evening Echo - Cork, Irish Examiner    Evening Echo Ltd    100%    Evening Echo - Cork, Irish Examiner      Irish Examiner Ltd    100%    Evening Echo - Cork, Irish Examiner    Irish Examiner Ltd    100%    Irish Examiner      Nationalist & Leinster Times Ltd    100%    Kildare Nationalist, Laois Nationalist, Nationalist, Nationalist, Carlow    Nationalist & Leinster Times Ltd    100%    Kildare Nationalist, Laois Nationalist, Nationalist, Carlow    Roscommon Herald Ltd    100%    Roscommon Herald Ltd    10%    Roscommon Herald Ltd    1%	Kevin Branigan	Bay Broadcasting Ltd	50%		Bay Broadcasting Ltd	50%	
Landmark Media InvestmentsExaminer Publications (Cork) Ltd100%100%Evening Echo - Cork, Irish ExaminerEvening Echo Ltd100%Evening Echo - CorkIrish Examiner Ltd100%Evening Echo - Cork, Irish ExaminerIrish Examiner Ltd100%Kildare Nationalist, Laois Nationalist, Nationalist, Nationalist, Nationalist - CarlowIrish Examiner Ltd100%Kildare Nationalist, Laois Nationalist, Nationalist, Nationalist - CarlowRoscommon Herald Ltd100%Roscommon Herald100%Roscommon Herald100%Roscommon HeraldSouth East Broadcasting Co Ltd75%WLR FMSouth East Broadcasting Co Ltd75%WLR FM	Kevin Mitchell	Datascope Ltd	60%		Datascope Ltd	60%	
Investments      Irish Examiner Ltd      100%      Evening Echo - Cork, Irish Examiner      Irish Examiner Ltd      100%      Irish Examiner        Nationalist & Leinster Times Ltd      100%      Kildare Nationalist, Laois Nationalist, Nationalist, Sationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Kildare Nationalist, Laois Nationalist, Nationalist, Carlow      Nationalist & Leinster Times Ltd      100%      Kildare Nationalist, Laois Nationalist, Nationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Ridare Nationalist, Laois Nationalist, Nationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Ridare Nationalist, Laois Nationalist, Nationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Ridare Nationalist, Laois Nationalist, Nationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Ridare Nationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Ridare Nationalist - Carlow      Nationalist & Leinster Times Ltd      100%      Roscommon Herald        Siteridge Ltd      10%      Roscommon Herald Ltd      10%      Roscommon Herald      10%      Cork's Red FM        South East Broadcasting Co Ltd      75%      WLR FM      South East Broadcasting Co Ltd      75%      WLR FM	Kyran McStay	KC II Ltd	36%				
ExaminerNationalist & Leinster Times Ltd100%Kildare Nationalist, Laois Nationalist, Nationalist, Nationalist, CarlowNationalist & Leinster Times Ltd100%Kildare Nationalist, Laois Nationalist, Nationalist, Nationalist, CarlowRoscommon Herald Ltd100%Roscommon Herald100%Roscommon Herald100%Roscommon HeraldSiteridge Ltd17%Cork's Red FMSiteridge Ltd17%Cork's Red FMSouth East Broadcasting Co Ltd75%WLR FM	Landmark Media Investments	Examiner Publications (Cork) Ltd	100%		Evening Echo Ltd	100%	Evening Echo - Cork
Nationalist, Na		Irish Examiner Ltd	100%	<b>.</b>	Irish Examiner Ltd	100%	Irish Examiner
Siteridge Ltd17%Cork's Red FMSiteridge Ltd17%Cork's Red FMSouth East Broadcasting Co Ltd75%WLR FMSouth East Broadcasting Co Ltd75%WLR FM		Nationalist & Leinster Times Ltd	100%	Nationalist, Nationalist -	Nationalist & Leinster Times Ltd	100%	Nationalist, Nationalist -
South East Broadcasting Co Ltd  75%  WLR FM  South East Broadcasting Co Ltd  75%  WLR FM		Roscommon Herald Ltd	100%	Roscommon Herald	Roscommon Herald Ltd	100%	Roscommon Herald
		Siteridge Ltd	17%	Cork's Red FM	Siteridge Ltd	17%	Cork's Red FM
WKW FM Ltd83%Beat FMWKW FM Ltd83%Beat FM		South East Broadcasting Co Ltd	75%	WLR FM	South East Broadcasting Co Ltd	75%	WLR FM
		WKW FM Ltd	83%	Beat FM	WKW FM Ltd	83%	Beat FM



Shareholder Larry Page & Sergey Brin Lebedev family Leonard Ryan Liam & Maureen Howard Liam O'Shea Liberty Global

Linda Nagle Lisa Collender Live Nation Duse Wilson M P Young Mairin Sheehy Malcolm Denmark Mallcot II Ltd Mallcot Ltd Margaret Flanagan

Margaret O'Dwyer Maria Nulty

Mark Hassett Mark Herbert Marketing Network Ltd

Martin Block

Martin Reilly Mary Burke Mary Buttle Mary Feeney

Mary Killeen

Mary Leane Mary Lynch

Mary Morrissey

Mary	O'Brien
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	2014
Entity	Hol
Google Inc	
Independent Print Ltd	1
Setanta Radio Ltd	
Avondhu Press Ltd	1
Dreamglade Ltd	
ITV plc	
C. & L. Publications Ltd	
Southern Star Ltd	
Principle Management Ltd	1
Nals Ltd	1
Mediaforce (Holdings) Ltd	
Osnovina Ltd	
Mediaforce (Holdings) Ltd	
Post Publications Ltd	
Flanagan Print & Graphics Ltd North West Media Ltd	
North West Media Ltd	
Nenagh Guardian Ltd	
Motoring Life Magazine Ltd	
Star Broadcasting Ltd	
Fox Radio Ltd	
North West Broadcasting Ltd	
Herald Printing and Publishing Co	
Corrmuda Ltd	
County Tipperary Radio Ltd	
Mallcot Ltd	
Mallcot II Ltd	
Gazette Group Newspapers Ltd	
Dungarvan Observer Ltd	
VSO Publications Ltd	
West Cork People Ltd	

4	
olding	Directly owned Outlets
55%	Google News
100%	Independent (UK)
50%	
100%	Avondhu Press
28%	
6%	ITV
50%	Dungarvan Leader
20%	Southern Star
100%	
100%	East Cork Journal
21%	
36%	Hot Press
73%	
71%	Sunday Business Post
50%	Youghal News
50%	
3%	Nenagh Guardian
50%	
2%	Sunshine 106.8FM
43%	
15%	Ocean FM
36%	Tuam Herald
15%	South East Radio
13%	Tipp FM
49%	
40%	
13%	Dublin Gazette, Lucan Gazette
10%	Dungarvan Observer
50%	Mallow Star, Vale Star, Weekly Observer
50%	West Cork People

	2017	
Entity	Holding	Directly owned Outlets
Independent Print Ltd	100%	
Setanta Radio Ltd	50%	
Avondhu Press Ltd	100%	Avondhu Press
Dreamglade Ltd	22%	
ITV plc	10%	ITV
TV3 Television Network Ltd	100%	be3, TV3
C. & L. Publications Ltd	50%	Dungarvan Leader
Southern Star Ltd	20%	Southern Star
Principle Management Ltd	100%	
Mediaforce (Holdings) Ltd	21%	
Osnovina Ltd	36%	Hot Press
Mediaforce (Holdings) Ltd	73%	
KC II Ltd	53%	
Flanagan Print & Graphics Ltd	50%	Youghal News
Informed Voice Media Ltd	13%	Carlow People, Dublin Voice, Wicklow Voice
Nenagh Guardian Ltd	3%	Nenagh Guardian
North West Broadcasting Ltd	15%	Ocean FM
Herald Printing and Publishing Co	36%	Tuam Herald
Corrmuda Ltd	15%	South East Radio
Mallcot Ltd	49%	
Mallcot II Ltd	0%	
Gazette Group Newspapers Ltd	25%	Dublin Gazette
Dungarvan Observer Ltd	10%	Dungarvan Observer
VSO Publications Ltd	50%	Mallow Star, Vale Star, Weekly Observer
West Cork People Ltd	50%	West Cork People



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Mary Taylor	Tontine Rooms Holding Co Ltd	19%		Tontine Rooms Holding Co Ltd	19%	
Maureen Rabbitt	Orangold Ltd	10%		Orangold Ltd	10%	
Media Development Investment Fund				Agora SA	11%	Gazeta (Poland)
Mediaforce (Holdings) Ltd	Iconic Newspapers Ltd	100%	Donegal Democrat, Donegal People's Press, Dundalk Democrat, Kilkenny People, Leinster Express, Leinster Leader, Leitrim Observer, Limerick Chronicle, Limerick Leader, Longford Leader, Nationalist - Tipperary/Clonmel, Offaly Express, South Tipp Today, Tipperary Star	Iconic Newspapers Ltd	100%	Donegal Democrat, Donega People's Press, Dundalk Democrat, Kilkenny People, Leinster Express, Leinster Leader, Leitrim Observer, Limerick Chronicle, Limerick Leader, Longford Leader, Nationalist - Tipperary/Clonmel, Offaly Express, South Tipp Today, Tipperary Star
Michael McGovern	Gazette Group Newspapers Ltd	12%	Dublin Gazette, Lucan Gazette			
Vichael O'Rourke	Setanta Radio Ltd	50%		Setanta Radio Ltd	50%	
Michael Shelley				Vienna Investments	50%	
Mike Ormonde	Bay Broadcasting Ltd	50%		Bay Broadcasting Ltd	50%	
Miriam Fitzmaurice	North Wicklow Times Ltd	50%	Wicklow Times	North Wicklow Times Ltd	50%	Wicklow Times
Murdoch Family	21st Century Fox	39%	Fox News	21st Century Fox	39%	Fox News
	News Corporation	39%	Sunday Times, Times Ireland Edition	News Corporation	39%	Sunday Times, Times Ireland Edition
News Corporation	News Group Newspapers Ltd	100%	Irish Sun, Irish Sun on Sunday	News Group Newspapers Ltd	100%	Irish Sun, Irish Sun on Sunda
				Wireless Group Ltd	100%	C103, Dublins Q102, FM104 Limerick's Live 95FM, LMFN
Nial Morrissey	Galmor Ltd	14%	Waterford Today			
Niall McGarry	Maximum Media Network Ltd	73%	her.ie, joe.ie	Maximum Media Network Ltd	50%	her.ie, joe.ie
Niall Stokes	Osnovina Ltd	47%	Hot Press	Osnovina Ltd	47%	Hot Press
Nicholas Mulcahy	Nalac Ltd	89%	Business Plus	Nalac Ltd	89%	Business Plus
Nora Egan	The North-West of Ireland Printing & Publishing Co Ltd	14%	Donegal News	The North-West of Ireland Printing & Publishing Co Ltd	15%	Donegal News
Norman Buttle	Corrmuda Ltd	22%	South East Radio	Corrmuda Ltd	22%	South East Radio
	Filbeck Ltd	33%		Filbeck Ltd	33%	
North Connaught Farmers Co-op	County Mayo Radio Ltd	27%	Mid West Radio			



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Old Mutual	Wireless Group Ltd	6%	be3, C103, Dublins Q102, FM104, Limerick's Live 95FM, LMFM			
Orangold Ltd	Donegal Highland Radio Ltd	100%	Highland Radio	Donegal Highland Radio Ltd	100%	Highland Radio
	Highland Media & Communications Investment Ltd	100%		Highland Media & Communications Investment Ltd	100%	
Orbis Investment Management Ltd	Johnston Press PLC	8%	Derry Journal			
Padraig Kennelly Snr	Kerry's Eye Ltd	50%	Kerry's Eye	Kerry's Eye Ltd	50%	Kerry's Eye
Padraig O'Dwyer	North West Broadcasting Ltd	24%	Ocean FM	North West Broadcasting Ltd	24%	Ocean FM
	North West Media Ltd	50%				
	River Media Newspapers Ltd	13%	Donegal Post, Finn Valley Post, Inish Times, Kildare Post, Letterkenny Post			
Patricia Folan	Galway Independent Newspapers Ltd	3%	Galway Independent			
Patrick Gallagher	Galmor Ltd	85%	Waterford Today			
Patrick Halpenny	Irish Radio & Media Holdings Ltd	33%		Irish Radio & Media Holdings Ltd	33%	
Patrick McDonagh	Classic Rock Broadcasting Ltd	19%	Radio Nova	Classic Rock Broadcasting Ltd	20%	Radio Nova
Patrick Ryan	Nenagh Guardian Ltd	48%	Nenagh Guardian	Nenagh Guardian Ltd	48%	Nenagh Guardian
Paul Claffey	County Mayo Radio Ltd	29%	Mid West Radio	County Mayo Radio Ltd	29%	Mid West Radio
Paul Connolly	European Radio Corporation Ltd	17%		European Radio Corporation Ltd	17%	
Paul Cooke	Post Publications Ltd	17%	Sunday Business Post			
Paul Healy	Media People Ireland Ltd	50%	Roscommon People	Media People Ireland Ltd	50%	Roscommon People
Peter Allen	The Connacht Tribune Ltd	15%	Connacht Tribune, Galway Bay FM	The Connacht Tribune Ltd	15%	Connacht Tribune, Galway Ba FM
Peter Benson	Wilton Radio Ltd	17%	iRadio NE, iRadio NW	Wilton Radio Ltd	17%	iRadio NE, iRadio NW
Peter Butler	North Dublin Publications Ltd	36%	Northside People East, Northside People West, Southside People			
Peter Keirans	Oriel Leader Ltd	75%	Dundalk Leader	Oriel Leader Ltd	75%	Dundalk Leader
Peter Kennedy	Kennedy Echo Publishing Ltd	33%	Echo (Dublin)	Kennedy Echo Publishing Ltd	33%	Echo (Dublin)
Peter Timmins	Galway Advertiser Ltd	5%	Athlone Advertiser, Galway Advertiser, Mayo Advertiser, Mullingar Advertiser	Community Newspapers Ltd	12%	
				Galway Advertiser Ltd	10%	Athlone Advertiser, Galway



P M Commath  D & D Media Ltd  40%  Instrumen Independent    D & D Media Ltd  40%  Instrumen Independent  D& D Media Ltd  40%  Instrumen Independent    Point Publications Ltd  Dublin Rock Radio Ltd  33%  TX FM 105-2  The Munster Express  14%    Principle Management Ltd  Dublin Rock Radio Ltd  33%  TX FM 105-2  The Munster Express  17%  Munster Express    PTF E2D SA  Community Newspapers Ltd  100%  Community Newspapers Ltd  100%  Community Newspapers Ltd  10%  Community Newspapers Ltd  10%  Community Newspapers Ltd  10%  Kerry Acquisitions Ltd  11%  Radio Kerry Holdings Ltd  11%  Radio Kerry Holdings Ltd  11%  Radio Kerry Holdings Ltd  10%  Kerry Acquisitions Ltd  10%  Media Atom  10%  Kerry Acquisitions Ltd  10%  Kerry Acquisitions Ltd  10%  Media St 10%  Minor St 10%  Mi			2014			2017	
Part Publications Nominees tid Principle Margement LID Principle Margement LID RO'Gorman Radio Courty Sound LID Radio Kerry Holdings LID R	Shareholder		Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Nomines LidPrinciple Management LidDubli Rock Radio Lid334TX H 105.2Principle Management LidDubli Rock Radio Lid336TX H 105.2PTE P2U SACommunity Newspapers Lid200Munster Express Lid106Radio Community Newspapers LidCork's 96fmCork Media Enterprises100Cork's 96fmRadio Community Newspapers LidCork's 96fmCork Media Enterprises100Cork's 96fmRadio Noval LidKerry Acquistions LidRery Acquistions Lid100%Kerry Acquistions Lid100%Radio Noval LidMaypril Lid100%Maypril Lid100%News J06 Lid72%News J06 LidRadio Tvon ToulesMidland Community Radio Services Lid100%Nidland S J3Nidland S J3Nidland S J3Radio Tvon ToulesToule Newspapers Lid100%Nidland S Community Radio Services100%Nidland S J3Radio Tvon ToulesToule Newspapers Lid100%Nidland S J3Nidland S J3Nidland S J3Radio Tvon Toules Roomaght Filegraph Lid72%Northide People Kast, Southide People Kast, Mayo Advertiser, Galway Advertiser Lid10%Southide People Kast, Southide People Kast, S	PJ McDermott	D & D Media Ltd	40%	Inishowen Independent	D & D Media Ltd	40%	Inishowen Independent
Principle Management Ltd Principle Management LtdDublin Rock Radio Ltd33% 33% TX FM 105.2 Muster ExpressFM 105.2 Muster ExpressThe Manster Express10% Agra SAThe Manster Express10% Agra SAThe Manster Express10% Agra SAThe Manster Express10% Agra SACommunity Newspapers Ltd10% South Self Enterprises10% Cont Media Enterprises10% Cork Media Enterprises10% Cork Media Enterprises00% Cork Media Enterprises00% Mediand Community Media Community Redio Services00% Midland Community Redio Services00% Cork Media Enterprises00% Midland Community Redio Services00% Midland Community Redio Services00% Cork Media Enterprises00% Midland Community Redio Services00% Cork Media Enterprises00% Community Redio Services00% Community Redio Services00% Cork Media Enterprises <td>Post Publications</td> <td></td> <td></td> <td></td> <td>Sunrise Media Ltd</td> <td>14%</td> <td></td>	Post Publications				Sunrise Media Ltd	14%	
Priscila Walk PTE PUS AL R O'Gorman Radio Cont Westigner Ltd20% Low Subisitions LtdMunster Express Low Solution17% Munster Express Munster Express Munster Express Agora SA16% Socatel (Poland)Radio Conty Sound Ltd Radio Phobal Chirard Teoarnata Readio Fuery Holdings LtdCork Westigners Marker Machanishions Ltd100%Cork S 96fmRadio Phobal Chirard Teoarnata Readio Two Thousand LtdMaypril Ltd100%Cork S 96fmRadio Phobal Chirard Teoarnata Radio Phobal Chirard Teoarnata Radio Marker Maland Community Radio Services Ltd100%Maypril Ltd100%Radio Two Thousand Ltd Radio Phobal Chirard Teoarnata Radio Two Thousand LtdMaypril Ltd100%Maypril Ltd100%Radio Two Thousand Ltd Radio Phobal Chirard Teoarnata Radio Marker Maland Community Radio Services Ltd100%Maypril Ltd100%Maypril Ltd100%Radio Two Thousand Ltd Radio Marker							
PTE PZU SA  Agora SA  16%  Gazeta (Poland)    R O'Gorman  Community Newspapers Ltd  100%  Community Newspapers Ltd  57%    Radio County Sound Ltd  Cork Media Enterprises  100%  Cork Media Enterprises  100%    Radio Charral  Kerry Acquisitions Ltd  100%  Cork Media Enterprises  100%    Radio Phoball Charral  Maypril Ltd  100%  Radio Kerry Holdings Ltd  100%    Radio Two Thousand Ltd  Maypril Ltd  100%  Maypril Ltd  100%    Radio Two Thousand Ltd  Maypril Ltd  100%  News 106 Ltd  72%    Radio Community Radio Services Ltd  100%  Midlands 103  Midland Sorvices  100%    Richard Gillespie  The Connaught Telegraph Ltd  17%  News 106 Ltd  72%  News 106 Ltd  72%    Robin Webb  Tontine Rooms Holding Co Ltd  30%  Athione Topic, Meath Topic, Offaly Topic, Westmeath Topic  Tontine Rooms Holding Co Ltd  30%  North Dublin Publications Ltd  90%  Athione Advertiser, Alway Advertiser, Multingar Advertiser, May Advertiser, Multingar Advertiser    Ronald O'Gorman  Galevy Investments Group Holdings Ltd  100%  Southside People East, Northside People East, Northside People East, Northside People East, Northside People May Advertiser, May Advertiser, May Advertiser, May Advertiser, May Advertiser, May Advert		Dublin Rock Radio Ltd		TX FM 105.2			
R O'Gorman  Community Newspapers Ltd  100%  Cork Media Enterprises  100%  Radio Cork Media Enterprises  100%  Radio Kerry Holdings Ltd  10%  Maypril Ltd  100%  Radio Kerry Holdings Ltd  10%  Midland Community Radio Services  100%  Midland S 103  North Sole Ltd  72%  Newstalk    Radio Kerry Holdings Ltd  100%  Midland S 103  Midland Community Radio Services  100%  Midland S 103  North Midland Community Radio Services  100%  Midland S 103  North Sole Media Enterprises  100%  Midland S 103  North Sole Media Services  100%  Midland S 103  North Sole Media Services  100%  North Sole Media Service		The Munster Express Ltd	20%	Munster Express			1
Radio County Sound Ltd  Cork Media Enterprises  100%  Cork's 96fm  Cork Media Enterprises  100%    Radio Korry Holdings Ltd  100%  Servery Acquisitions Ltd  100%  Radio Kerry Holdings Ltd  100%    Radio Korry Holdings Ltd  Maypril Ltd  100%  Servery Acquisitions Ltd  100%    Radio Korry Holdings Ltd  Maypril Ltd  100%  Maypril Ltd  100%    Radio Korry Holdings Ltd  Maypril Ltd  100%  Maypril Ltd  100%    Radio Korry Holdings Ltd  100%  Maypril Ltd  100%  Newstalk    Radio Roman Interprises  Midland Community Radio Services Ltd  100%  Maypril Ltd  100%    Richard Gilespie  The Connaught Felegraph Ltd  17%  Tindle Newspapers Ltd  100%  Athone Topic, Meath Topic, Meath Topic, Origi Newspapers Ltd  100%  Athone Topic, Meath Topic    Robin Webb  Galway Advertiser Ltd  30%  Athone Topic, Meath Topic, Outling Co Ltd  30%  Northside People East, Northside People East, Northside People Meast, Northside People West, Southside People Meast, Mathone Advertiser, Malvand Advertiser, Malvand Advertiser, Malvand Sarah Brooks  Mathone Advertiser, Radio Mada Ltd  Soff    Ronaull Unlimited  Galway Independent Newspapers Ltd  10%	PTE PZU SA				Agora SA	16%	Gazeta (Poland)
Radio Kerry Holdings Ltd  Kerry Acquisitions Ltd  100%  Radio Kerry Holdings Ltd  100%    Radio Kerry Holdings Ltd  Maypril Ltd  100%  Radio Kerry Holdings Ltd  11%  Radio Kerry    Radio Two Thousand Ltd  Maypril Ltd  100%  Maypril Ltd  100%  Maypril Ltd  100%    Ray Tindle  Midland Community Radio Services Ltd  100%  Midlands 103  Midlands 103  Midlands 103    Richard Gillespie  The Connaught Telegraph Ltd  100%  Midland Community Radio Services Ltd  00%  Athione Topic, Meath Topic, Offaly Topic, Weath Topic, Southside People East, Northside People East, Southside People East, Mullingar Advertiser, Mayof Advert	R O'Gorman	Community Newspapers Ltd	100%		Community Newspapers Ltd	57%	
Radio Phobail Chiarrai Teoaranta  Radio Kerry Holdings Ltd  11%  Radio Kerry    Radio Two Thousand Ltd  Maypril Ltd  100%  Maypril Ltd  100%    Radio Two Thousand Ltd  Maypril Ltd  100%  Maypril Ltd  100%    Radio Community Radio Services Ltd  100%  Midland Community Radio Services  100%  Tontice Rooms Holding Co Ltd  30%  Northside People Kast, Northside People Kast, Northside People Kast, Northside People  North Side People  Northside People  Northside People Kast, Northside People Kast, Nor	Radio County Sound Ltd	Cork Media Enterprises	100%	Cork's 96fm	Cork Media Enterprises	100%	Cork's 96fm
Tecaranta  Image: Constraint of the c	Radio Kerry Holdings Ltd	Kerry Acquisitions Ltd	100%		Kerry Acquisitions Ltd	100%	
News 106 Ltd63%NewstalkNews 106 Ltd72%NewstalkRay TindleMidland Community Radio Services Ltd100%Midlands 103Midland Community Radio Services100%Midlands 103Richard GillespieThe Connaught Telegraph Ltd17%Tindle Newspapers Ltd.10%Tindle Newspapers Ltd.10%Tindle Newspapers Ltd.10%Tindle Newspapers Ltd.10%Tindle Newspapers Ltd.10%Topic Newspapers Ltd.10%Topic Newspapers Ltd.10%Topic Newspapers Ltd.10%Topic Newspapers Ltd.10%Topic Newspapers Ltd.9%Athlone Topic, Meath Topic, Offaly Topic, Westmeath TopicTopic Newspapers Ltd.9%Athlone Topic, Meath Topic, Offaly Topic, Westmeath TopicTopic Newspapers Ltd.9%Northside People East, Northside People East, Northside People East, Northside People West, Southside Weether Wewt West, Weather Weether Weet	Radio Phobail Chiarrai Teoaranta				Radio Kerry Holdings Ltd	11%	Radio Kerry
Ray Tindle  Midland Community Radio Services Ltd  100%  Midlands 103  Midland Community Radio Services  100%  Midlands 103    Richard Gillespie  The Connaught Telegraph Ltd  10%  Athone Topic, Meath Topic, Offaly Topic, Westmeath Topic, Offaly Topic, Westmeath Topic, Offaly Topic, Westmeath Topic, Offaly Topic, Westmeath Topic  Topic Newspapers Ltd.  90%  Athone Topic, Meath Topic, Offaly Topic, Westmeath Topic, Offaly Topic, Westmeath Topic, Offaly Topic, Westmeath Topic  Topic Newspapers Ltd.  90%  Athone Topic, Meath Topic, Offaly Topic, Westmeath Topic, Offaly Topic, Westmeath Topic  Topic Newspapers Ltd.  90%  Athone Topic, Meath Topic, Meath Topic, Offaly Topic, Westmeath Topic  Topic Newspapers Ltd.  90%  Athone Topic, Meath Topic, Meath Topic, Offaly Topic, Westmeath Topic  Topic Newspapers Ltd.  90%  Athone Topic, Meath Topic, Meath Topic, Offaly Topic, Westmeath Topic    Robert Todd  Tontine Rooms Holding Co Ltd  30%  North Sublin Publications Ltd  90%  Northside People East, Northside People East, Northside People  North Sublin Publications Ltd  50%  Northside People West, Southside People    Roomall Unlimited  Galeway Advertiser Ltd  100%  Athone Advertiser, Galway, Advertiser, Galway, Advertiser, Galway, Advertiser, Galway, Mulingar Advertiser, Mayo Advertiser, Mayo Advertiser, Galway, Mulingar Advertiser, Galway, Galway Independent Newspapers Ltd	Radio Two Thousand Ltd	Maypril Ltd	100%		Maypril Ltd	100%	
Index  Idd    Tapic Newspapers Ltd  100%  Tindle Newspapers Ltd  10%    Richard Gillespie  The Connaught Telegraph Ltd  17%  Topic Newspapers Ltd  00%  Athlone Topic, Meath Topic, Offfaly Topic, Westmeath Topic  Topic Newspapers Ltd  90%  Athlone Topic, Meath Topic, Offfaly Topic, Westmeath Topic    Robert Todd  Tontine Rooms Holding Co Ltd  30%  Tontine Rooms Holding Co Ltd  30%  Tontine Rooms Holding Co Ltd  30%    Robert Todd  Tontine Rooms Holding Co Ltd  30%  Northside People East, Northside People East, Southside People West, Southside West, Wes		News 106 Ltd	63%	Newstalk	News 106 Ltd	72%	Newstalk
Richard Gillespie    The Connaught Telegraph Ltd    17%      Richard Hogan    Topic Newspapers Ltd.    90%    Athlone Topic, Mesth T	Ray Tindle	Midland Community Radio Services Ltd	100%	Midlands 103	•	100%	Midlands 103
Richard HoganTopic Newspapers Ltd.90%Athlone Topic, Meath Topic, Offaly Topic, Westmeath Topic Offaly Topic, Westmeath TopicTopic Newspapers Ltd.90%Athlone Topic, Meath Topic, Offaly Topic, Westmeath TopicRobert ToddTontine Rooms Holding Co Ltd30%Tontine Rooms Holding Co Ltd30%Tontine Rooms Holding Co Ltd30%Robin WebbNorth Dublin Publications Ltd64%Northside People East, Northside PeopleNorth Side PeopleSoft Soft Soft Soft Soft Soft Soft Soft		Tindle Newspapers Ltd	100%		Tindle Newspapers Ltd	100%	
Robit Webb    Tontine Rooms Holding Co Ltd    30%    Tontine Rooms Holding Co Ltd    30%      Robin Webb    North Dublin Publications Ltd    64%    Northside People East, Northside People    North Dublin Publications Ltd    50%    Northside People West, Southside People      Ronald O'Gorman    Galway Advertiser Ltd    10%    Athlone Advertiser, Galway Advertiser, Mayo Advertiser, Mullingar Advertiser, Mullingar Advertiser, Mayo Advertiser, Mullingar Advertiser,	Richard Gillespie	The Connaught Telegraph Ltd	17%				
Robin WebbNorth Dublin Publications Ltd64% 64% Northside People East, Northside People West, Southside People Malingar Advertiser, Galway Advertiser, Mayo Advertiser, Mullingar Advertiser, Mayo Advertiser, Mullingar Advertiser, Mullinga	Richard Hogan	Topic Newspapers Ltd.	90%		Topic Newspapers Ltd.	90%	
Anald O'Gorman    Galway Advertiser Ltd    Northside People West, Southside People    Northside People West, Southside People      Ronald O'Gorman    Galway Advertiser Ltd    10%    Advertiser, Mayo Advertiser, Mayo Advertiser, Mullingar Advertiser, Mullingar Advertiser    Image: Company and Company    Galway Independent Newspapers Ltd    100%    Image: Company    Image: Company <td>Robert Todd</td> <td>Tontine Rooms Holding Co Ltd</td> <td>30%</td> <td></td> <td>Tontine Rooms Holding Co Ltd</td> <td>30%</td> <td></td>	Robert Todd	Tontine Rooms Holding Co Ltd	30%		Tontine Rooms Holding Co Ltd	30%	
Advertiser, Mayo Advertiser, Mullingar Advertiser    Advertiser, Mullingar Advertiser      Ronmall Unlimited Company    Gaiety Investments Group Holdings Ltd    100%	Robin Webb	North Dublin Publications Ltd	64%	Northside People West,	North Dublin Publications Ltd	50%	Northside People West,
Company    And the set of the set	Ronald O'Gorman	Galway Advertiser Ltd	1%	Advertiser, Mayo Advertiser,			
Sarah BrooksGuardian News and Media Ltd100%GuardianMotoring Life Magazine Ltd50%Clondalkin News, Lucan News, Rathcoole & Saggart News, Tallaght NewsScott TrustGuardian News and Media Ltd100%GuardianGuardian News and Media Ltd100%GuardianSean AshmoreBroadcast Investments Ltd25%County Kildare Broadcasting Ltd25%County Kildare Broadcasting Ltd25%East Coast Radio Ltd6%East Coast FMEast Coast Radio Ltd37%East Coast FMHeart Media Ltd100%100%ToomationHeart Media Ltd50%	Ronmall Unlimited Company	Gaiety Investments Group Holdings Ltd	100%				
Scott Trust  Guardian News and Media Ltd  100%  Guardian  Guardian News and Media Ltd  100%  Guardian    Scott Trust  Guardian News and Media Ltd  100%  Guardian  Guardian News and Media Ltd  100%  East Coast Radio Ltd  25%  Telest Coast Radio Ltd  25%    Heart Media Ltd  100%  100%  100%  Telest Coast Radio Ltd  37%  East Coast FM	Rory Tyson	Galway Independent Newspapers Ltd	2%	Galway Independent			
Sean Ashmore  Broadcast Investments Ltd  25%  County Kildare Broadcasting Ltd  25%    East Coast Radio Ltd  6%  East Coast FM  East Coast Radio Ltd  37%  East Coast FM    Heart Media Ltd  100%  Meart Media Ltd  50%  Meart Media Ltd  S0%	Sarah Brooks				Motoring Life Magazine Ltd	50%	Rathcoole & Saggart News,
East Coast Radio Ltd6%East Coast FMEast Coast Radio Ltd37%East Coast FMHeart Media Ltd100%Heart Media Ltd50%	Scott Trust	Guardian News and Media Ltd	100%	Guardian	Guardian News and Media Ltd	100%	Guardian
Heart Media Ltd  100%  Heart Media Ltd  50%	Sean Ashmore	Broadcast Investments Ltd	25%		County Kildare Broadcasting Ltd	25%	
		East Coast Radio Ltd	6%	East Coast FM	East Coast Radio Ltd	37%	East Coast FM
Star Decoderation Ltd 20/ Supplies 406 0EM		Heart Media Ltd	100%		Heart Media Ltd	50%	
Star Broducasting Ltu 276 SUBSNINE 106.8FM					Star Broadcasting Ltd	2%	Sunshine 106.8FM



		2014			2017	
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Sean Lyne	Benster Ltd	1%		Benster Ltd	1%	
	Frontline Asset Management Ltd	100%		Frontline Asset Management Ltd	100%	
Sean Miniter	Frontline Asset Management Ltd	0%		Frontline Asset Management Ltd	0%	
Setanta Media Holdings Ltd	News 106 Ltd	18%	Newstalk			
Setanta Radio Ltd	Spin South West Ltd	10%	Spin South West	News 106 Ltd	9%	Newstalk
Sheila Mullins	West Cork People Ltd	50%	West Cork People	West Cork People Ltd	50%	West Cork People
Siobhan O'Connell	Nalac Ltd	10%	Business Plus	Nalac Ltd	10%	Business Plus
SSgA Funds Management				Microsoft Corp	4%	MSN
State Street	Microsoft Corp	4%	MSN			
Stephen Maguire	Donegal Daily Ltd	50%	Donegal Daily	Donegal Daily Ltd	50%	Donegal Daily
Sultan Muhammad Abuljadayel				Independent Digital News and Media Ltd	30%	Independent (UK)
Sunrise Media Ltd				Post Publications Ltd	100%	Sunday Business Post
Susan Daly	Journal Media Ltd	2%	TheJournal.ie			
Susan Dineen	Cork News and Media Ltd	10%	Cork News			
Sydney Glass	Jarls Investments Ltd	33%				
T I Naughton	The Connacht Tribune Ltd	30%	Connacht Tribune, Galway Bay FM			
TCI Fund management				21st Century Fox	7%	Fox News
Terence & Gabriel Mangan	Dreamglade Ltd	28%				
The Connacht Tribune Ltd	Western Community Broadcasting Services Ltd	100%		Western Community Broadcasting Services Ltd	100%	
The Glaoine Partnership Ltd	Jarls Investments Ltd	33%		Dackar Ltd	29%	
The Irish Times Ltd	D'Olier Investments Ltd	100%		D'Olier Investments Ltd	100%	
The Trustee Company Ltd	Datascope Ltd	40%		Datascope Ltd	40%	
Thomas E and Thomas P Crosbie	Landmark Media Investments	100%	BreakingNews.ie, Enniscorthy Echo, Gorey Echo, New Ross Echo, Waterford News and Star, Western People, Wexford Echo	Landmark Media Investments	100%	BreakingNews.ie, Waterford News and Star, Western People
Thomas Gillespie	The Connaught Telegraph Ltd	17%				
Thomas Kelley				Gazette Group Newspapers Ltd	35%	Dublin Gazette



	2014			2017		
Shareholder	Entity	Holding	Directly owned Outlets	Entity	Holding	Directly owned Outlets
Thomas Kiernan	Topic Newspapers Ltd.	10%	Athlone Topic, Meath Topic, Offaly Topic, Westmeath Topic	Topic Newspapers Ltd.	10%	Athlone Topic, Meath Topic, Offaly Topic, Westmeath Topic
Tim Collins	Eagle Island Holdings	67%		Eagle Island Holdings	67%	
	North West Broadcasting Ltd	15%	Ocean FM	North West Broadcasting Ltd	15%	Ocean FM
	River Media Newspapers Ltd	13%	Donegal Post, Finn Valley Post, Inish Times, Kildare Post, Letterkenny Post			
Tim Rabbitt	Orangold Ltd	10%		Orangold Ltd	10%	
Tontine Rooms Holding Co Ltd	Alpha Publications Ltd	100%	Midland Tribune, Tullamore Tribune	Alpha Publications Ltd	100%	Midland Tribune, Tullamore Tribune
Tullamore Beta Ltd	TV3 Television Network Ltd	100%	TV3			
UBS				Sky plc	7%	Sky News
UK Government	BBC	100%	BBC	BBC	100%	BBC
	Channel Four Television Corporation	100%	Channel 4	Channel Four Television Corporation	100%	Channel 4
Usaha Tegas [Ananda Krishnan]	Johnston Press PLC	19%	Derry Journal	Johnston Press PLC	11%	Derry Journal
Vanguard Group	Microsoft Corp	5%	MSN	Microsoft Corp	7%	MSN
Veranne Lynch				The North-West of Ireland Printing & Publishing Co Ltd	12%	Donegal News
Verizon Communications				AOL	100%	
Inc						
				Oath, Inc	100%	Huffington Post
				Yahoo Inc	100%	Yahoo
Viaduct Publishing Ltd	Oriel Leader Ltd	25%	Dundalk Leader	Oriel Leader Ltd	25%	Dundalk Leader
Vienna Investments	Classic Rock Broadcasting Ltd	37%	Radio Nova	Classic Rock Broadcasting Ltd	38%	Radio Nova
	Siteridge Ltd	69%	Cork's Red FM	Siteridge Ltd	69%	Cork's Red FM
Vincent O'Donovan	Carrigdhoun News Ltd	100%	Carrigdhoun	Carrigdhoun News Ltd	100%	Carrigdhoun
Viscount Rothermere	DMGT plc	100%	Irish Daily Mail, Irish Mail on Sunday	DMGT plc	100%	Irish Daily Mail, Irish Mail on Sunday
Web Radio Ltd	Radio Two Thousand Ltd	0%	98FM, Spin 1038	Radio Two Thousand Ltd	0%	98FM, Spin 1038
William Ryan	Carnbeg Ltd	97%	Limerick Post	Carnbeg Ltd	100%	Limerick Post
Wireless Group Ltd	County Media Ltd	100%		County Media Ltd	100%	
Yeoman Investments SA	Yeoman International Group Ltd	100%		Yeoman International Group Ltd	100%	

