



Department
for Culture
Media & Sport

Media Ownership and Plurality

Consultation

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Overview

Media plurality is about the information that people consume on a daily basis, which informs their views and perspective on the world.

In the past, policy on media plurality has focussed on ensuring that there is a wide-range of viewpoints available. On the face of it, this is less of an issue in the digital age. Anyone with access to television in the UK now has access to over 40 channels, and anyone with access to the internet has access to many providers of news and information, as well as a whole host of other forms of digital content. However, appearances may be deceiving – a large number of outlets for news do not necessarily help to maintain plurality, if all the content originates from one company (e.g. a newswire like Reuters). Equally, there may be a diverse range of content being produced, but people may choose to access it from a particular source – for example the BBC accounts for 25% of TV news minutes broadcast, but 73% of TV news viewing¹. This will be exacerbated if the algorithms of search engines like Google mean that only some content is easily discoverable, limiting the opportunity for a wide-range of voices to be heard.

The focus of the debate around media plurality has tended to be centred on concerns about excessive influence. This is far more difficult to define, measure and address, because it is concerned not only with what is available, but also what people choose to consume – as it is this which drives the growth of media organisations.

This is further complicated by the difficulty in defining what constitutes media in the increasingly connected and converging online world. It was once easy to identify media as being available in newspapers, on TV and on the radio. But with the increasing amount of content accessed online, the lines that distinguish these once separate media are blurring. These media are also becoming harder to distinguish from personal and social content, which is often accessible on the same platforms like YouTube and Facebook.

¹ Lords Communications Committee Inquiry on Media Plurality BBC Response
<http://www.parliament.uk/documents/lords-committees/communications/Mediaplurality/MediaPluralityEvidence.pdf>

Lord Justice Leveson considered these issues in the context of his inquiry into the Culture, Practice and Ethics of the Press. Given the broad constraints of the work that the inquiry had to undertake, there was not sufficient time to look at these matters in detail. As such Lord Justice Leveson made a number of recommendations “at the level of desirable outcomes and broad policy framework, rather than the technical means of achieving these outcomes”.

Taking Lord Justice Leveson’s recommendations as the starting point, this consultation seeks views on the scope of a measurement framework for media plurality, specifically:

- the types of media it should include;
- the genres it should cover;
- the types of organisation and services to which it should apply;
- the inclusion of the BBC; and,
- the audiences with which it should be concerned.

In light of the views expressed, we will commission the development of a clear measurement framework, to be worked up in partnership with industry, and the completion of the first ever market analysis of plurality in the UK. This will provide a ‘state of the nation’ view of the true extent of plurality in the UK today.

Lord Justice Leveson also recognised that there is currently no mechanism for addressing plurality concerns which arise as a result of organic change in the media. The evidence gathered will inform the Government’s response to Lord Justice Leveson’s recommendation on organic change, including whether or not periodic media plurality reviews or reviews triggered by a metric would effectively respond to these concerns.

What do we mean by media plurality?

Media plurality is concerned with ensuring the public are exposed to a range of different opinions, views and information from a variety of sources. There is no definition of media plurality in statute; however, in advice to the Department in 2012, Ofcom provided a useful definition of the desired outcomes of a plural market:

- Ensuring that there is a diversity of viewpoints available and consumed across and within media enterprises.
- Preventing any one media owner or voice having too much influence over public opinion and the political agenda.

Lord Justice Leveson noted in his report that this approach to both the diversity of views available and the influence wielded seems to be generally accepted.

While it is clear that neither Government nor any other body can compel people to consume a range of media voices, or control the impact that these voices have on public opinion, the principle remains that the Government should seek to promote the availability and consumption of a range of media voices.

Background to the debate

The UK's regulatory framework seeks to ensure the existence of a range of media voices in three main ways:

i) Media mergers and the public interest test:

The Enterprise Act 2002 provides that the Secretary of State may intervene in media mergers², where there is a public interest concern relating to:

“the need, in relation to every different audience in the United Kingdom or in a particular area or locality of the United Kingdom, for there to be a sufficient plurality of persons with control of the media enterprises serving that audience;”³

To date there have been public interest interventions in only three cases: Sky / ITV, News Corporation / Sky and Global Radio / GMG Radio.

ii) Media ownership rules

At present, there are three main statutory restrictions⁴ on media ownership.

- “The 20/20 rule” - preventing a person who runs a national newspaper group with a national market share of 20% or more from controlling licences to provide a regional or national Channel 3 service or Channel 5.

² Section 58 of the Enterprise Act provides for the Secretary of State to intervene in relevant mergers, but the Secretary of State may also intervene in media mergers on the grounds of public interest where no ‘relevant merger’ situation has arisen (engaging Section 56).

³ The definition of media enterprises does not include providers of internet content, or wholesalers of broadcast content, who do not hold a broadcast licence.

⁴ The *Code of Recommended Practice on Local Authority Publicity* regulates the publicity issued by local authorities. Provisions in the Local Audit and Accountability Bill will strengthen that statutory code to prevent the independent press being undermined by unfair competition by local authority ‘newspapers’.

- The prevention or restriction on TV or radio licences being granted to particular types of person whose influence might cause concern (for example, advertising agencies)
- The requirement for Channel 3's appointed news provider not to be excluded by the above rules and to be suitably well remunerated.

iii) Obligations on Public Service Broadcasters

Public Service Broadcasters are required (through the public service broadcasting framework) to ensure certain levels of content provision, including in news, and Ofcom regulates Channels 3, 4 and 5 through licence conditions designed to promote the purposes of public service television. These conditions are mostly concentrated on news and current affairs programming.

A further safeguard against potential influence on the news agenda by media owners are the requirements for due accuracy and impartiality in television and radio news. These standards – amongst others for broadcast TV and radio - are set out in the Broadcasting Code, overseen by Ofcom, and in the case of the BBC, in its Editorial Guidelines. In 2007, the BBC published a report on safeguarding impartiality in the 21st century.⁵ Drawing on the views of BBC staff, the report noted that what might be expected in a large organisation – a 'groupthink' – is not peculiarly absent at the BBC, which could lead to certain opinions being under-represented. The report set out 12 guiding principles to complement the impartiality sections in the BBC's Editorial Guidelines.

Ofcom also has a duty under the Broadcasting Acts 1990 and 1996 to be satisfied that any person holding a broadcasting licence is, and remains, fit and proper to do so. In 2010, Ofcom revoked the licence of Bang Channels limited, on the basis that it *"no longer considered that the Licensees were fit and proper persons to hold a licence"* as a result of *"serious and repeated breaches of the Ofcom Broadcasting Code."*

Broadcasting content over the internet is subject to the Broadcasting code, and since 2010, regulations have applied to video-on-demand services like LOVEFILM or 4oD. These regulations focus on the prevention of harm to children, material likely to incite hatred and

⁵ http://www.bbc.co.uk/bbctrust/news/press_releases/2007/impartiality.html

commercial relationships. They include rules preventing sponsorship and product placement in news and current affairs programmes.

Newspapers self-regulate, and at present the Press Complaints Commission is responsible for enforcing an industry code of practice and dealing with complaints.

Wider internet content is not subject to regulation beyond the general law.

A new approach

There are good reasons for wanting to look again at this approach.

The media market has moved on considerably in the decade since the passage of the Communications Act 2003. New technologies, from tablets to smartphones, enable us to access a range of different content – from last night’s TV to podcasts and TED⁶ talks, the latest twitter debate to news headlines and the views of bloggers. The internet provides access to a greater range of information, news and opinion than ever before. The increasing dynamism of this sector is illustrated by the fact that Google News and Facebook, which were founded in 2002 and 2004 respectively, have now become two of the three most-used online sources for news after the BBC. Yet, our current regulations do not recognise this. They were designed at a time when the scarcity of analogue spectrum limited the number of TV channels, and there were high barriers to entering the newspaper market.

Public interest interventions in relation to plurality are limited to media mergers; the definition of a ‘media enterprise’ in the public interest test does not include providers of internet content, or wholesalers of broadcast content who do not broadcast themselves; and, the 20/20 rule is concerned with the circulation of national newspapers – despite the fact that we increasingly access their content online.

In the context of the Public Interest Test carried out in response to the proposed merger of News Corp and BskyB, Ofcom recommended that the UK Government consider undertaking a wider review of the current media plurality system. In September 2011, the Government

⁶ TED (Technology, Entertainment & Design) is a global set of conferences offered for free viewing online.

commissioned Ofcom to provide advice on this matter, which was then considered by Lord Justice Leveson, as part of his inquiry into the Culture, Practice and Ethics of the Press.

Lord Justice Leveson subsequently set out 8 recommendations in relation to media plurality in his report, on issues such as measurement, periodic reviews and organic growth, which were “at the level of desirable outcomes and broad policy framework, rather than the technical means of achieving those outcomes”:

1. The particular public policy goals of ensuring that citizens are informed and preventing too much influence in any one pair of hands over the political process are most directly served by concentrating on plurality in news and current affairs. This focus should be kept under review.
2. Online publication should be included in any market assessment for consideration of plurality.
3. Ofcom and the Government should work, with the industry, on the measurement framework, in order to achieve as great a measure of consensus as is possible on the theory of how media plurality should be measured before the measuring system is deployed, with all the likely commercial tensions that will emerge.
4. The levels of influence that would give rise to concerns in relation to plurality must be lower, and probably considerably lower, than the levels of concentration that would give rise to competition concerns.
5. Ofcom has presented the Inquiry and the Government with a full menu of potential remedies, and it has not been argued or suggested that any of them are inappropriate in principle. Each of them might be appropriate in a given set of circumstances and the relevant regulatory authority should have all of them in its armoury.
6. The Government should consider whether periodic plurality reviews or an extension to the public interest test within the markets regime in competition law is most likely to provide a timely warning of, and response to, plurality concerns that develop as the result of organic growth, recognising that the proposal for a regular plurality review is more closely focussed on plurality issues.

7. Before making a decision to refer a media merger to the competition authorities on public interest grounds, the Secretary of State should consult relevant parties as to the arguments for and against a referral, and should be required to make public his reasons for reaching a decision one way or the other.
8. The Secretary of State should remain responsible for public interest decisions in relation to media mergers. The Secretary of State should be required either to accept the advice provided by the independent regulators, or to explain why that advice has been rejected. At the same time, whichever way the Secretary of State decides the matter, the nature and extent of any submissions or lobbying to which the Secretary of State and his officials and advisors had been subject should be recorded and published.⁷

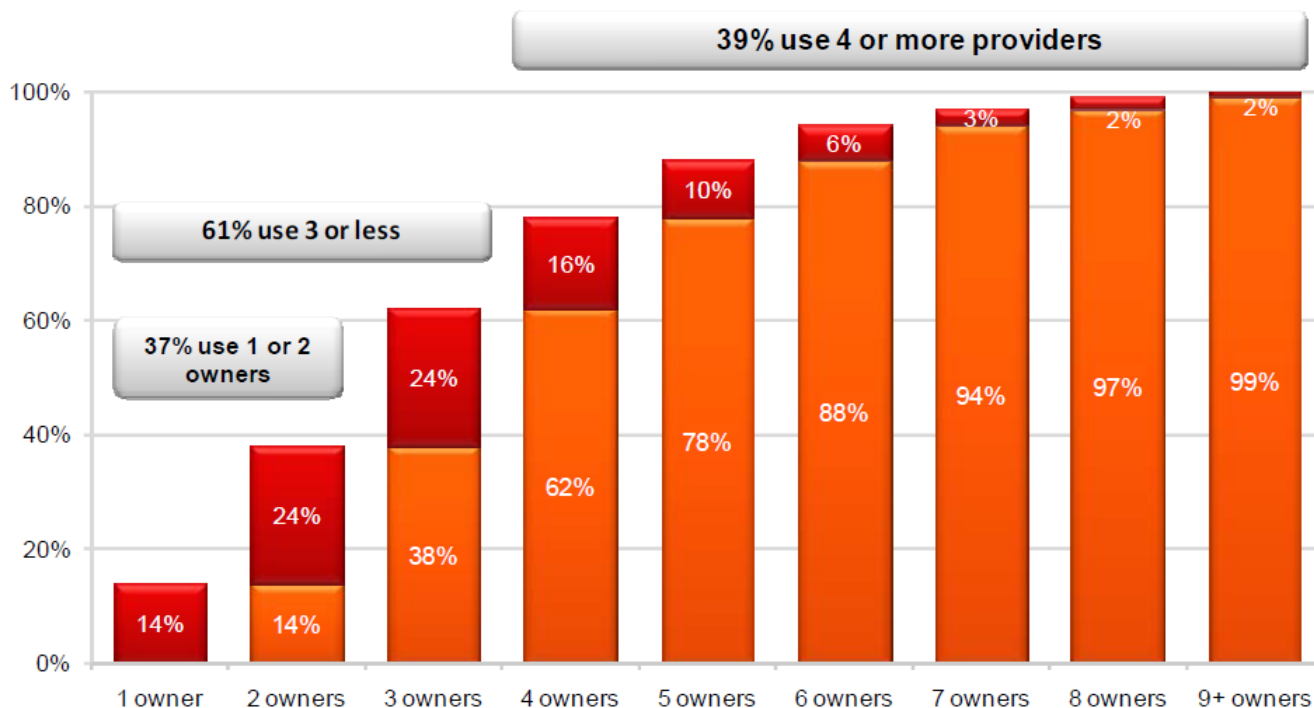
⁷ <http://www.official-documents.gov.uk/document/hc1213/hc07/0779/0779.pdf>

Statistics - where do we get our news from?

News providers

People are increasingly using a range of providers for their news content. The graph below shows that, in 2012, 39% of people use four or more providers of news.

Figure 1 – Number of Providers used at retail level⁸



Source: Kantar Media quantitative research study (Feb/March 2012)

Base: All who use a news source nowadays (2244)

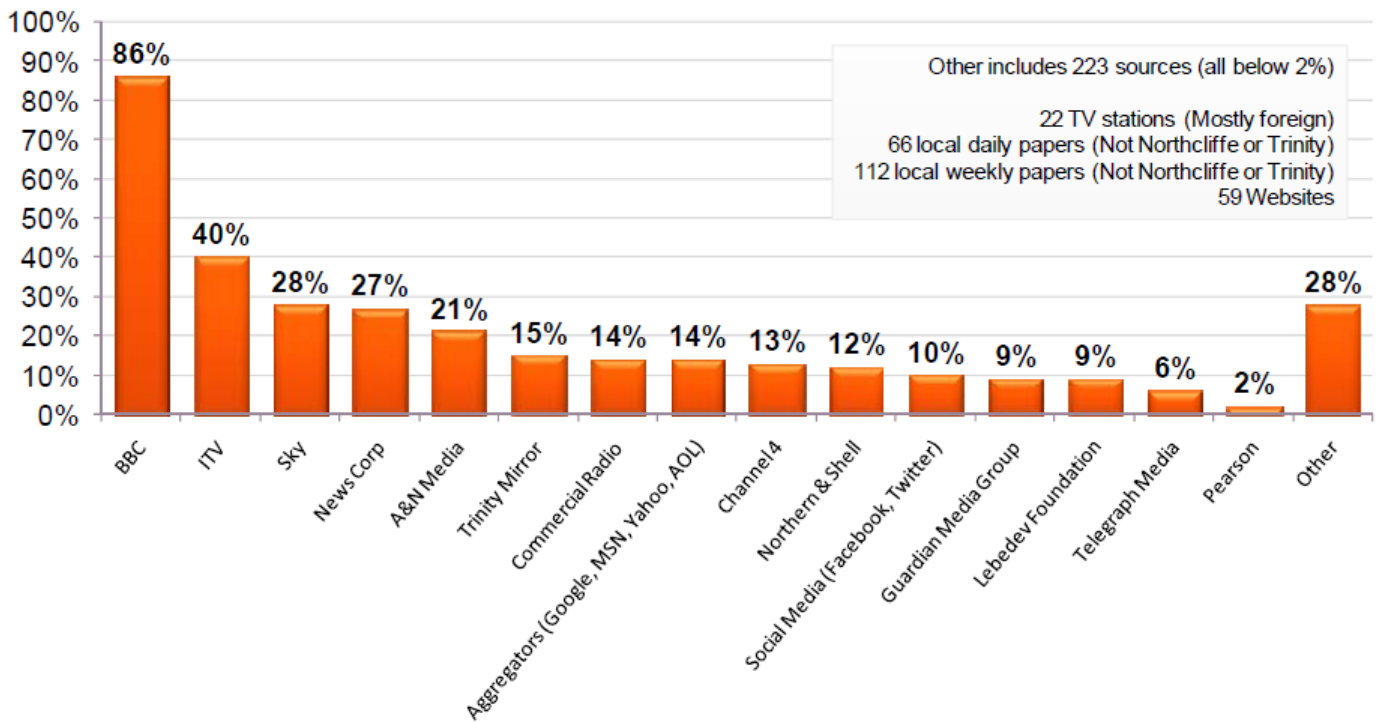
⁸ Ofcom, News consumption in the UK, June 2012

<http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex4.pdf>

Audience reach

Below we can see that the BBC has substantial reach across all its news sources. In 2012, this equated to 86% of all adults who follow the news nowadays.⁹

Figure 2: Cross platform audience reach for news – retail level



Base: All who use a news source nowadays (2254)

Source: Kantar Media quantitative research study (Feb/March 2012)

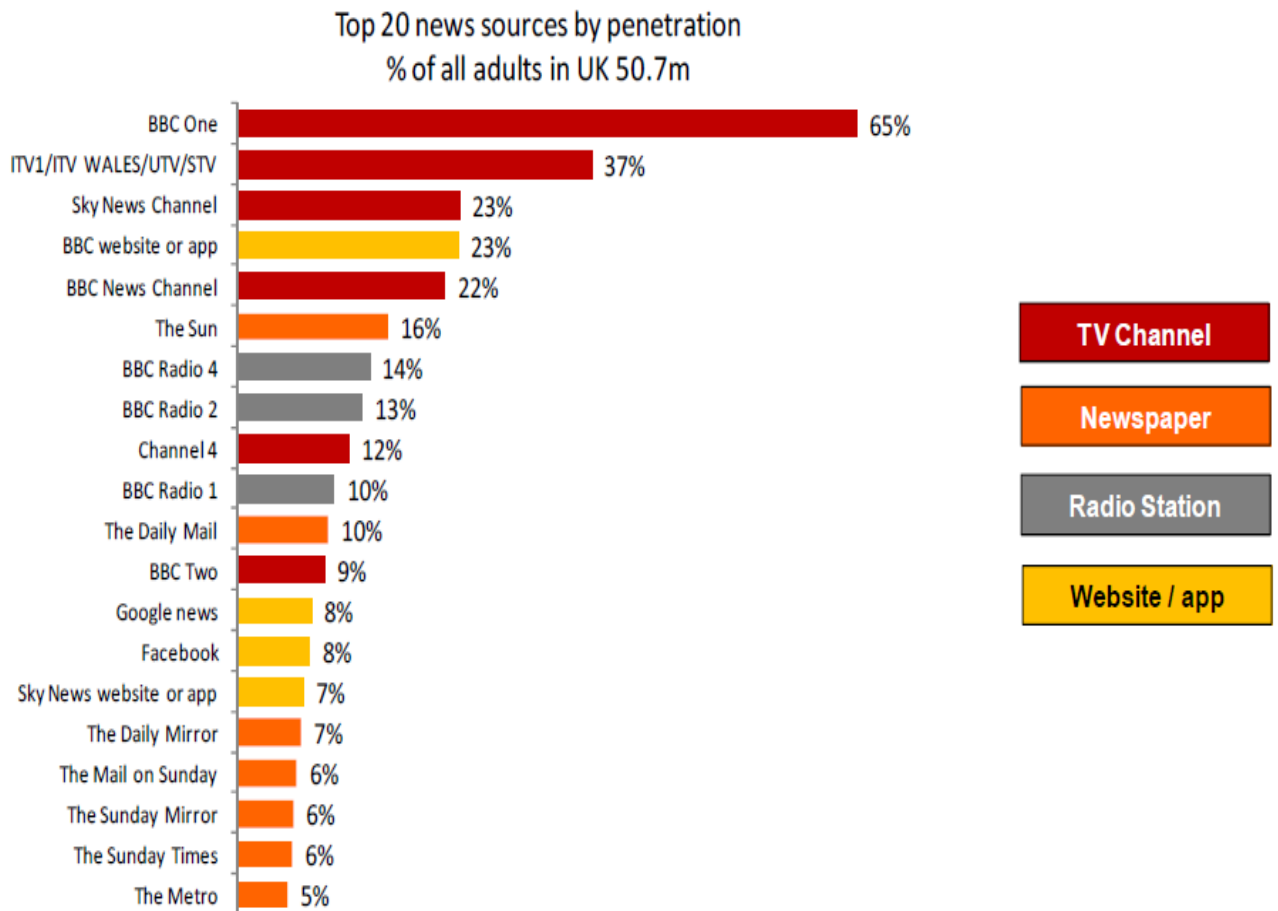
⁹ Ofcom, News consumption in the UK, June 2012

<http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex4.pdf>

News Sources

As demonstrated by the graph below, the top five sources used nowadays are BBC One, ITV, Sky News, the BBC Website and BBC News.¹⁰

Figure 3: Top 20 News Sources (2012)



Source: Kantar Media quantitative research study (Feb/March 2012) Q5a-f) Thinking specifically about <Source> which of the following do you use for news nowadays? Base: All adults 16+ in UK (2379)

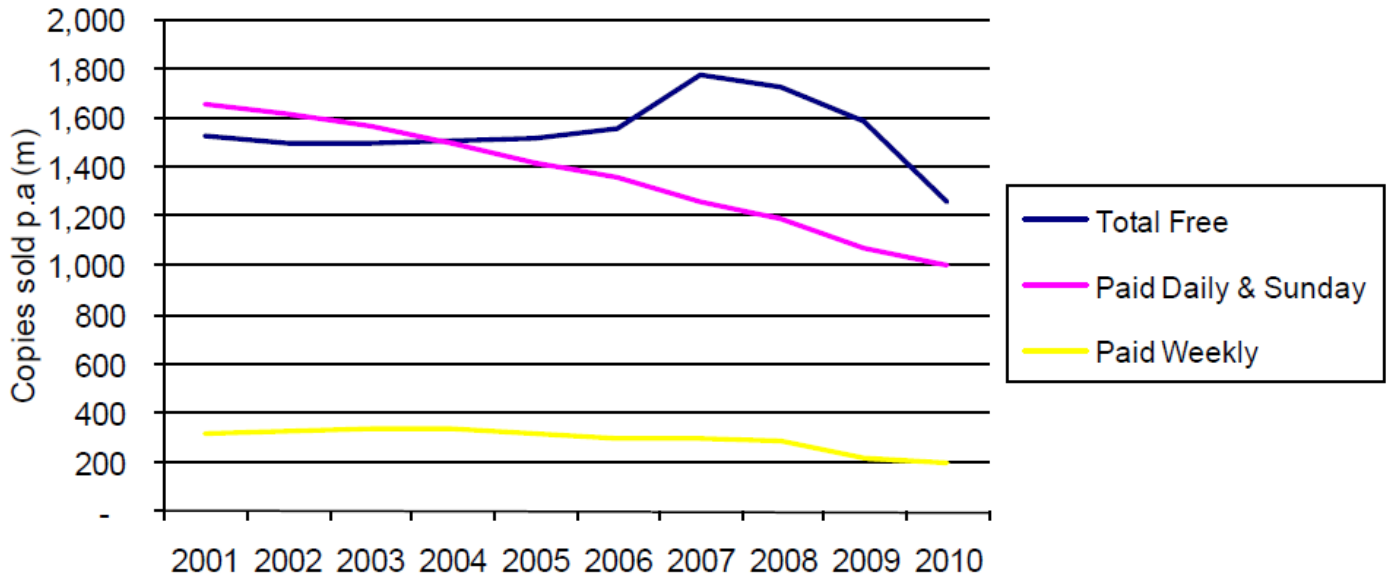
¹⁰ Kantar Media report for Ofcom, April 2012

<http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex5.pdf>

Decline of newspaper circulation

The graph below shows the decline of newspaper circulation since 2001:

Figure 4: UK circulation of local & regional newspapers¹¹



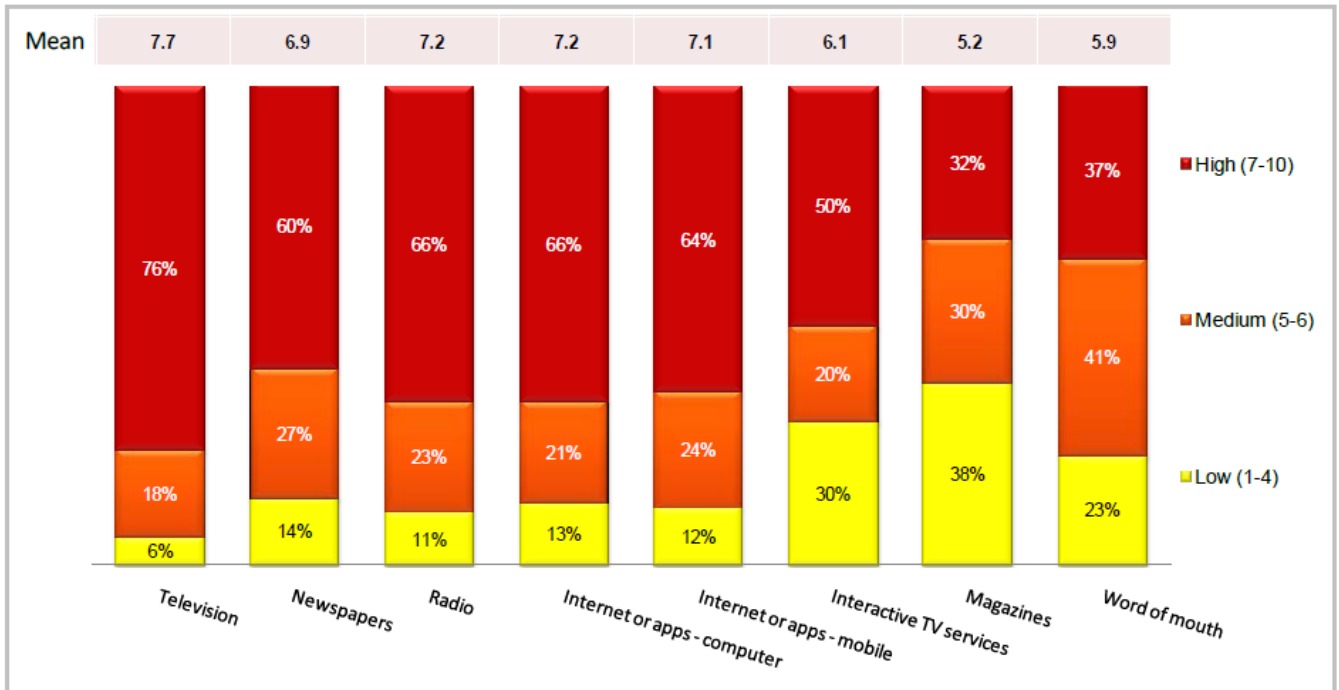
Source: AA/ABC/Newspaper Society

¹¹ http://stakeholders.ofcom.org.uk/binaries/research/local-media-assessments/northcliffe_media.pdf

Importance of news platforms amongst users

The graph below shows that television is considered the most personally important platform for news.

Figure 5: Personal importance of news platforms across users of each platform¹²



¹² Ofcom, News consumption in the UK, June 2012
<http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex4.pdf>

About the consultation

In line with Lord Justice Leveson's recommendations, the Government will be commissioning the development of a clear measurement framework to be worked up in partnership with industry, and the completion of the first ever market assessment of plurality in the UK today.

This evidence base will benchmark the degree of plurality in modern Britain today. It will inform views on the level of plurality that is sufficient, provide a means of securing timely warning of plurality concerns arising from organic change, and how best these might be addressed.

At this stage, the purpose of this consultation is to hear your views on the scope of the measurement framework:

- the types of media it should include;
- the genres it should cover;
- the types of organisation and services to which it should apply;
- the inclusion of the BBC; and,
- the audiences with which it should be concerned.

Each section takes Lord Justice Leveson's recommendations as the starting point and seeks your views on what this means in practice for the scope of a measurement framework for media plurality.

This will inform the commissioning of a measurement framework, which will be used to produce the first ever market analysis of plurality in the UK.

How to respond

If you would like to submit to us any comments on the issues raised in this paper, we would ask that you do so by 22nd October 2013, to either:

- MediaPlurality@culture.gsi.gov.uk

or by post to:

- DCMS Media Team
100 Parliament Street
London SW1A 2BQ

Publication:

Please note that we may publish your submissions on the DCMS website, unless you ask us not to do so. However, under the Freedom of Information Act 2000 all information in responses, including personal information, may be subject to publication or disclosure. If any correspondent requests confidentiality this cannot be guaranteed, and will only be possible if considered appropriate under the legislation. Confidentiality disclaimers generated by your IT system in e-mail responses will not be treated as a request not to release information.

Section 1: Which Media?

The current media ownership rules only apply to newspapers, television and radio. They do not extend to other media organisations that only operate in the online sphere – such as the Huffington Post.

Yet in terms of news consumption, 41% of adults in the UK now regularly access news via the internet, this has grown from just 15% in 2002 (Ofcom, News consumption in the UK, 2012). Of course, much online content is generated by media organisations that used to reach their audience via another medium e.g. Newspaper or TV. However, the internet has also created an outlet for new voices to reach the public, including a myriad of individual, smaller voices that can be heard, for example through blogs.

As recommended by Lord Justice Leveson, we consider that online publication should be included within the scope of any new measurement framework for plurality.

Question:

- 1. Do you agree that online should be included within the scope of any new measurement framework?**

Section 2: Which Genres?

Television, radio, newspapers and the internet all provide a variety of different types of content: news and current affairs, sport, light entertainment, drama, factual and cultural output and a range of other genres. All of these, it can be argued, influence opinions, shape outlooks and condition the political discourse.

As noted by Lord Justice Leveson, Ofcom and other regulatory authorities have, to date, concentrated their consideration of media plurality on news and current affairs (although they are not required by the current regulatory framework to do so). Lord Justice Leveson supported this approach, recommending that “*the particular public policy goals of ensuring that citizens are informed and preventing too much influence in any one pair of hands over the political process, are most directly served by concentrating on plurality in news and current affairs. However, the focus should be kept under review*”.¹³

In their media plurality report to the Secretary of State in June 2012, Ofcom also stated that “*the unrestricted dissemination of a diverse range of information, opinions and arguments about the day’s news and events provides the greatest potential to inform citizens and ensure an effective democratic process.*”¹⁴ Arguably though, moral issues, views and expressions of opinion can arise in many genres such as drama, light entertainment, factual and ‘reality’ programming, and written comment, with the way that issues are presented influencing the way in which people engage with democracy. And, in a multi-media, internet age, it is more difficult both to delineate what constitutes news and current affairs, and establish the extent to which people rely on traditional news media to gather their information and ideas. For example, there may be some debate about whether TED talks are news and current affairs.

¹³ <http://www.official-documents.gov.uk/document/hc1213/hc07/0779/0779.pdf>

¹⁴ <http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/statement.pdf>

If the content scope is to be wider, there is a question as to how this might be defined: to include all content, or to seek to limit it, for example to all factual content rather than fictional.

There is also a question about the extent to which social media content should be within scope of a measurement framework for plurality. Social media enables individuals and special interest groups to publicise their views and opinions more easily, and can be a first source of breaking news. For example, some major news stories in recent years, such as the American forces' raid on Osama Bin Laden and the announcement of the Royal Wedding, were broken first on Twitter. It has also been argued that a tweet is more like a broadcast than an email and as a consequence is subject to the law of libel in the same way.

Questions:

- 2. What type of content is relevant to media plurality?**
- 3. Do you believe that scope should be limited to news and current affairs, or be widened to consider a wider cultural context?**
- 4. If so, how might a wider context be defined?**

Section 3: Which Organisations and Services?

Having defined the type of content that we think a measurement framework should include, we need to identify the organisations and services - from production to point of access - that should be within scope of a measurement framework.

Role of organisation

Regardless of platform, a range of organisations are involved in bringing content to audiences. The table below details the different types of organisation and services provided.

Role		Definition	e.g.
Originator		Gather news independently. Retail supplier of news.	Reuters, BBC
Wholesaler		Third party news coordinated centrally for wider distribution.	ITN
Retailer	Broadcaster	TV, Radio - Transmits messages audibly or visually, has editorial control.	Sky, Channel 4
	Publisher	Newspaper, website - Publicly issues written information, has editorial control.	The Guardian, Mail Online
Aggregator		Consolidated source of third-party content.	Google News
Search Engine		A website that allows the user to search for information available on the Internet, usually using key words.	Google
Social Media		The means of interactions among people in virtual communities and networks.	Facebook, Twitter

The classic model of media retail is based on an approach where a publisher or broadcaster of news content acquires content from a varied range of sources. The two primary sources are: content produced in-house (retail content) and content sourced from third parties (wholesale content). For example, ITV and Channel 4 source news content and programming from ITN which acts as a wholesale news provider. In contrast, most national

newspapers and the BBC produce a significant amount of news content in-house, acting as both wholesaler and retailer.

A media supply chain based on this model might look like this:



However, the internet has created the opportunity for a range of new services that can not only create and sell content, but also affect its availability and discoverability. As with so much in the connected world, these distinctions are blurred, with many organisations providing services that fall into multiple categories, or that are a hybrid of two or more types. There can be a complex and changing mixture of content that is provided by algorithms, social recommendations, and also curated original or third party material. For example, many popular applications and websites like Flipboard and YouTube have been a success precisely because of their seamless integration of social and third party originated content. Likewise, Google's News aggregator and related search functionality use algorithms that can include user information like location and news search history. Even more traditional news organisations like the BBC Website and Guardian Online will provide links to third party and social content in order to support their coverage, particularly of breaking live events.

With the number of users who access content through aggregated, social and search websites such as Google News and Facebook increasing (in 2011 they were the 13th and 14th most popular news sources respectively¹⁵), there is the potential for these organisations to exert a degree of control over the content that is made available to their users. Whether content is delivered to audiences on the basis of social recommendations, a curated service or pure algorithms, it is possible that a service may give prominence or improved discoverability to content originating from certain news sites over others.

¹⁵ Ofcom, News consumption in the UK, June 2012
<http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex4.pdf>

As recommended by Lord Justice Leveson, we feel that it is important that online publication is included within the scope of any new measurement framework. However, we want to consider the extent of this: should 'online' include only publishers of content, such as online newspaper sites, or should other media organisations in the news value chain be included, for example wholesalers such as ITN news? Should 'aggregators', search engines, social media or forums and 'sharing' websites such as YouTube be considered in scope? The question of content as discussed above is, of course, relevant to this. If we are considering a wider scope in terms of genre, then the provision of online content other than news and current affairs has to be considered.

Questions:

- 5. What sorts of organisations and services are relevant to media plurality?**

- 6. Do you believe that scope should be limited to publishers or include services that affect discoverability and accessibility?**

Section 4: The BBC

The BBC is estimated to have spent c.£430m on news and current affairs output during 2011 – more than the remaining UK television and radio news broadcasters combined. It is the market leader in each of the three platforms where it has a news presence (73% of television news hours; a high (though unquantifiable) proportion of radio news output and 46% of all page views amongst the top 50 online news providers)¹⁶. In Ofcom’s advice to the Secretary of State on measuring media plurality in 2012, it concluded that “The BBC’s significant scale and leading position in three of the four platforms mean that it must be fully included in any assessment.” Lord Justice Leveson noted this, and the BBC agrees that any review will need to take into account consumption of BBC news.

The inclusion of the BBC in a measurement framework is distinct from the question of whether the BBC should be subject to any new plurality regulation. There are strong views on either side of this debate. On the one hand, it is considered that the BBC’s overriding requirement to be both independent and impartial, the fact that it is subject to extensive and detailed editorial and governance controls, and that it is tied to serving the public interest through its charter and through the high expectations of, and accountability to, licence payers mean that it should sit outside any new regulation.

On the other hand, it is pointed out that the BBC is not alone amongst news organisations in having a reputable brand, high audience expectations and detailed governance and editorial processes. There is also a body of research suggesting that broadcast impartiality is challenging despite strong governance arrangements. For example, the BBC Trust’s most recent review of the breadth of opinion reflected in the BBC’s output, found that the complexity of some issues and arguments related to the EU means that limits of time and space have inhibited the BBC’s ability to give profile to a full range of opinions¹⁷. The same report also highlighted that the BBC was slow to reflect the weight of concern in the wider

¹⁶ Ofcom, News consumption in the UK, June 2012
<http://stakeholders.ofcom.org.uk/binaries/consultations/measuring-plurality/statement/Annex4.pdf>

¹⁷ http://downloads.bbc.co.uk/bbctrust/assets/files/pdf/our_work/breadth_opinion/breadth_opinion.pdf

community about issues arising from immigration. An earlier Trust report in 2011 identified shortcomings in the BBC's science coverage, due to an at times 'over-rigid' application of the impartiality guidelines¹⁸, which resulted in 'undue attention to marginal opinion', for example on the safety of the MMR vaccine, GM crops or the existence of man-made climate change.

As a major player in the market, the BBC also has a significant impact on the overall range and scale of provision. This scale makes it important that the BBC is internally plural as well as impartial: the two are not synonymous. Ofcom's advice to the Secretary of State noted that while the BBC adopts different approaches across its news programmes and services as it seeks to serve all demographic groups, this does not guarantee that any individual is subject to a sufficient diversity of viewpoints. As such, we consider that a measurement framework should assess the BBC's impact on plurality.

Questions:

- 7. Do you agree that the BBC's impact on plurality should be assessed as part of a plurality review?**

¹⁸http://www.bbc.co.uk/bbctrust/assets/files/pdf/our_work/science_impartiality/science_impartiality.pdf

Section 5: The Audience

Lord Justice Leveson considered plurality primarily in the context of a UK wide media market, although he acknowledged that sufficiency will certainly be variable in different markets.

To provide a complete picture of the true extent of plurality across the UK, we consider that a measurement framework will need to take into account the specific circumstances of local media. This is important in terms of ensuring lively democratic debate in our local communities.

The existing merger regime sits within the general competition law framework, so is a reserved matter, but it makes clear *“the need, in relation to every different audience in the UK, in a particular area or locality of the UK, for there to be a sufficient plurality of persons with control of the media enterprises serving that audience”*.

Many areas have established local newspapers, which are often complemented by an online presence. Regional news is broadcast by the BBC (which also has regional pages on its website) and ITV, and 2014 will see the launch of local TV stations in 19 areas. Many people will listen to a local radio station (both from the BBC and commercial stations) which will include local news items and stories. In many areas, ‘hyperlocal’ websites are beginning to appear, sometimes where there may be gaps in provision of news or information from other sources, these can receive high user figures and become a key source of information for people in specific communities. However, the amount, quality and type of information that people are able to and actively do access in regions and local areas can differ enormously.

In a converged world, we think there may also be merit in considering the extent to which there is plurality in the media serving other audiences – for example different demographic groups, or communities of interest. We would be interested in your views.

Questions:

- 8. Are there specific factors that you think a measurement framework needs to capture in order to provide a picture of plurality in local communities?**

- 9. Do you agree that a measurement framework should also seek to assess the plurality of media serving other audiences or communities of interest? If so, which ones?**