

Report by Professor Stan Glaser on
Listener Attitude Research undertaken on behalf of the
Australian Communications and Media Authority

10 June 2011

Introduction

I have been asked by Commercial Radio Australia to evaluate two research reports, "Community attitudes to radio content" and "Listener attitudes to advertising, sponsorship and influence on commercial radio", and provide my opinion on the following questions:

1. Do the reports contain any limitations or flaws, having regard to commonly accepted research methodology?
2. If so, what are those limitations and/or flaws?
3. Do those limitations and/or flaws affect the reliance that can be placed on the reports, particularly as a basis for the development of public policy?

Qualifications and Experience

My qualifications and experience are set out in Attachment One. In summary, I hold a Doctorate of Philosophy in marketing and have taught advanced social research methodology, published papers and practised in this field of expertise for 47 years. A bibliography of my published work in this field appears in Attachment One. I have held professorial positions at Macquarie University and the University of Western Sydney. I have been a visiting professor at Cranfield University in the United Kingdom and the Stockholm School of Economics . I have also been engaged by a wide range of clients to provide market and social research studies and advice in both the public and private sectors, across a diverse range of industries and fields of activity.

Approach

I have formed the opinions set out below as an independent expert. I have no connection or association with Commercial Radio Australia, other than my engagement in preparing this report.

All material on which I have relied to prepare this report is referenced in the report.

Summary of Conclusions

The methodologies and questionnaires employed by each study are examined under various research criteria which are explained below. The validity of the findings in first study, "Community attitudes to radio content," are suspect because of considerable shortcomings in questionnaire design. These deficiencies make it highly unlikely that the results can be regarded as an unbiased reflection of community attitudes or behaviour. Hence, I have concluded that the translation of these results into public policy is unwarranted.

In relation to the questions I have been asked, my conclusions in relation to this report are that (using the question numbering set out above):

1. Yes, this report does contain limitations and flaws when evaluated against commonly accepted research criteria.
2. Those limitation and flaws are identified in the body of this report below. In particular, this research has a number of design flaws. My key findings regarding these flaws are:
 - a. Imprecise question wording which makes the responses to questions difficult to interpret;
 - b. A tendency to 'lead' the respondents by failing to establish the salience of issues and provide opportunities for the respondent to offer no opinion;
 - c. An inability to distinguish between socially desirable responses and the respondents' own views; and
 - d. Difficulties in reconciling figures pertaining to what the sample claim to do, with ACMA and other data which show what people actually do.
3. Having regard to those limitations and flaws, it would be unsafe to rely on the report to form any conclusions, particularly as a basis for public policy.

The second report, "Listener attitudes to advertising, sponsorship and influence on commercial radio," provides interesting and empirically established findings on the cues listeners use in discriminating between advertising and other broadcast material. There is also some reasonably firm evidence of the community's concern with the different formats in which advertising is presented. However the findings related to community attitudes to advertising on commercial radio and perception of commercial influence on content, are less firmly grounded. These latter findings are also not strong enough to warrant translation into public policy.

In relation to the questions I have been asked, my conclusions in relation to this report are that (using the question numbering set out above):

1. Yes, this report does contain limitations when evaluated against commonly accepted research criteria, noting that some of these limitations are to be expected in research of this nature.
2. Those limitations are identified in the body of this report below. In summary, these limitations are:
 - a. The influence of social desirability in the respondents views on the influence advertisers have on commercial broadcasters;
 - b. The extent to which this social desirability also affects attitudes to advertising on commercial radio; and
 - c. Hence an the inability of the study to present compelling evidence about community views on advertising and sponsorship
3. Having regard to those limitations, it would be unsafe to rely on the report to form conclusions in relation to community attitudes to advertising on commercial radio, particularly as a basis for public policy, as this research is only partially effective. On the other hand, the research findings in relation to listener responses to particular radio clips is, given the constraints of the survey methodology employed, soundly based and provides reasonably firm evidence in relation to the matters researched.

Background

Commercial Radio Australia asked me to comment on two market research reports which had been prepared for the Australian Communications and Media Authority by Ipsos MediaCT and to provide my opinion on the three questions set out above. The reports in question are entitled “Community attitudes to radio content” (February, 2010) and “Listener attitudes to advertising, sponsorship and influence on commercial radio” (February, 2010).

Method

Both reports were evaluated by on conventional and commonly accepted research criteria, being the adequacy of research design, sampling methodology and the research instruments employed given the objectives of the studies. In undertaking my review, my approach has been tempered by the commercial realities of such research. That is, I have made specific allowance for the trade offs between the costs of social research of this nature and the quality of the resultant data as a basis for public policy.

Structure of this report

Before the Ipsos documents are evaluated a general contextual discussion of the medium of radio is presented. Each report is then considered on the criteria outlined above.

Setting the Context

The modern understanding of the characteristics of different communication media can be traced to Marshall McLuhan (1967). Radio, in particular, was described by McLuhan as a “hot” medium because it extends a single sense. As he wrote, “Radio affects most people intimately, person-to-person, offering a world of unspoken communication between writer-speaker and the listener. That is the immediate aspect of radio. A private experience. radio gives privacy, and at the same time it provides the tight tribal bond of the world of the common market, of song, and of resonance. It contracts the world to village size, and creates insatiable village tastes for gossip, rumor, and personal malice.” (pps. 319, 326)

McLuhan’s views were controversial at the time but research has established the essential veracity of his insights. For example, radio is a “companion”, establishing a personal relationship with the listener; it provides a social “glue” with listeners who use radio brands and personalities to help define their social relationships (hence the notion of the “electronic neighbourhood”) and evokes, in the listener, a strong sense of intimacy (*Brand Audit Report*, 2001; *Understanding the Listener*, 2004). The latter is probably due to the way in which the human voice so powerfully conveys emotion. (Music is similar in this respect, although it has a particular ability to induce, rather than transmit, emotions). Our responsiveness to voice is evident very early during maturation. From the age of about four months the nervous system of infants shows sensitivity to the human voice compared to nonvocal sounds (Grossman et al., 2010). Of all the media radio has the greatest capacity to develop an emotionally close relationship with its audience.

Intimacy is, of course, a fundamental aspect of social relations as it reflects on the emotional distance between people. If radio is such an intimate medium, how is this relationship with the audience established? The growth of personal bonds has a fairly typical pattern that does not vary across cultures. Reisman (1950), who describes this pattern, labels it the “taste exchange process.” What is most striking about this process is the role that brands, products and services play in initiating and maintaining social connectedness.

When two people meet for the first time there is usually dialogue to move towards some common ground. Part of this conversation invariably involves a comparison of tastes, like and dislikes. Consumer goods, movies, brands, current events etc. are put on display to map the territory of personal similarity. For example, if both parties enjoy opera, sport and so on it is assumed they will also have other similar tastes and preferences. This, in turn, will attest to their psychological similarity and hence encourage the exploration of more sensitive and personal topics. Of course, this also highlights the vital role of language in human affairs. As Dunbar (1996. Pp. 78-79) so persuasively argues:

“. . . . language evolved to allow us to gossip It allows you to say a great deal about yourself, your likes and dislikes, the kind of person you are; it also allows you to convey in numerous subtle ways something about your reliability as an ally or friend.”

Conversation, in short, is a form of ‘vocal grooming’ as contrasted to the sort of physical grooming observed in primate communities. Radio, particularly via its talk back programs, is an excellent medium for this very human activity. The commercial nature of these conversations, the fact that products, brands, celebrities etc. figure prominently, is a natural and normal part of the intimacy dynamic of radio.

References

Brand Audit Report and Recommendations. Report prepared for FARB, 2001

Dunbar, R., *Grooming, Gossip and the Evolution of Language*, London: Faber & Faber, 1996

Grossmann, T., Oberecker, R., Koch, S., & Friederici, A., “The Developmental Origins of Voice Processing in the Human Brain.” *Neuron*, March 25, 2010, pp. 852-858

McLuhan, M., *Understanding Media: The Extensions of Man*, London: Sphere Books, 1967

Understanding the Listener: The intimate medium, 2004

Reisman, D., *The Lonely Crowd*, New Haven: Yale University Press, 1950

1.00 Ipsos report “Community attitudes to radio content”

The research objectives of this study were to provide an overview of listening behaviours and preferences and then addressed specific questions related to community concerns about offensive and inappropriate radio content. The focus was on commercial radio services.

Comment The implicit assumption behind the establishment of these objectives is that there is evidence of some community concern about commercial radio content. To check the support for this assumption the ACMA Annual Report for 2009-10 (pp. 203-206) gives data on the number of reported and confirmed breaches in that period. There were thirty reported breaches, fourteen of which were upheld. While not directly comparable there were 3,212 complaints about online content. These data do not demonstrate significant community concern.

The *sampling methodology* appears to be rigorous. A minor point is that while the response rate of 42% is respectable there is no information of how many calls were made to find people “at home.” However there is an increasing stream of findings which indicate that lower response rates do not necessarily impact upon survey accuracy (e.g. Visser et al., 1996)

On the other hand there are various problems with the questionnaire in relation to the opinion and attitude items as contrasted to the classification (listening behaviour, demographics etc.) items. To highlight these problems a number of criteria for evaluating each of the attitudes and opinions questions are presented and the question is then evaluated on each criterion. The criteria are as follows:

Problems of wording: e.g. Is the question a “leading” question? That is, does the question assume that the issue has some salience to the audience? Are there too many words, thus potentially affecting comprehension? Are there potential problems with interpretation of the question?

Problems of flow: Should the question be preceded by a filter question to establish salience? Should the question have additional response categories to allow the respondent more choice in answering?

Filter questions are usually employed to determine whether it is appropriate to ask a further series of questions. For example, during the so called global financial crisis (GFC) a research company had the following introduction to subsequent questions designed to capture changes in household expenditure patterns.

“Now that we are in the middle of the GFC and households are having to spend less”

This assumes all households are experiencing the GFC and that their only response is to decrease expenditure. Both of these suppositions have to be established before the expenditure questions can be asked. So the sample is

“filtered” by way of appropriate qualifying questions. As Payne (1980, p. 178) remarks: “The sample of respondents becomes unrepresentative as soon as we begin eliciting opinions on questions which they and the rest of the public have not been considering.”

The inclusion of “additional response” categories most commonly refers to allowing the respondent to answer “don’t know” (DK) or otherwise indicate they have “no opinion” (NO). If this option is unavailable the effect is to distort the distribution of answers to fit in to the options which are available e.g. only “yes” or “no” forces those who have no opinion or simply can’t answer into a positive response.

Social desirability bias: Does the question encourage the respondent to answer in ways that are considered to be socially desirable? Community responses often reflect media themes, rather than the opinions or behaviour of the respondents themselves e.g. people endorse ecologically safe products without changing their own purchasing behavior.

The Questions

Q3.1 I am now going to ask you about things you might have heard on radio that have concerned or offended you. Please think about **all** the radio stations you listen to. Have you heard anything on radio **recently** that caused you concern or that offended you? By recently I mean in **the last 7 days**.

(IF NECESSARY, SAY ‘I mean something you’ve heard that offended you’)

Wording problem: The question assumes salience (leading question). There is conflation of concern and offended, with a resultant inability to determine whether individual is responding to “concern” or “offended”. The two words are not synonyms.

Flow problem: There should be filter question to establish if there is anything the respondent has heard in the last 7 days that has caught their attention. THEN establish what that is and THEN whether this caused concern/offense. The absence of a filter probably serves to inflate the incidence of positive responses.

No DK (“don’t know”, “no opinion”) category. Respondent forced to nominate in prescribed categories. If this option cannot be freely chosen the distribution of responses is artificially distorted i.e. people are pushed into one of the available categories.

3.2 And have you heard anything on radio in **the last 12 months** that caused you concern or that offended you?

[IF 'YES' ABOVE, THEN SAY "Not including something that offended you in the last 7 days, I mean in the 12 months prior to that"]

Yes

No

Ditto as in Q3.1 but accuracy of 12 months recall is highly suspect. This is also a leading question.

3.3 What was it that caused you offence or concern (on these occasions)? REPEAT PROMPT "Anything else?" UNTIL RESPONDENT PROVIDES ALL RESPONSES. DO NOT READ OUT, MULTI.

RECORD VERBATIM (EACH OCCASION AS **SEPARATE** TEXT VARIABLE)
INTERVIEWER NOTE: IF COMMENT IS ABOUT **ADVERTISING**, PLEASE IDENTIFY.

Social desirability bias: If respondents claimed there was material that caused offense or concern they are now being asked to identify the issue. For some this will come as a surprise, so the inclination will be to manufacture an issue. Because an ex post justification is called for it is more appropriate, in terms of generating higher validity data, to avoid this and establish the issue/s beforehand. However the results indicate the great variability in the responses (Table 3, page 20) which again underscores the heterogeneity of "mass opinion".

- 4.1 I am going to read out a number of statements that people have made about radio generally. I'd like you to think again about all the radio stations you listen to, and tell me whether you agree or disagree to the statements that I read out. Firstly, ... [READ OUT STATEMENT, FOLLOWED BY "Do you agree, disagree or, neither agree nor disagree". IF AGREE OR DISAGREE "Is that strongly?"]

IF NECESSARY, CLARIFY WITH "Do you strongly (dis)agree, or just (dis)agree?"
PROVIDE RATING, 1-5, 98.

1. STRONGLY AGREE
2. AGREE
3. NEITHER AGREE NOR DISAGREE
4. DISAGREE
5. STRONGLY DISAGREE

98. DON'T KNOW

ROTATE STATEMENTS

a	A phone call made by a radio station as an embarrassing joke should only be broadcast with the permission of the person or people involved	1-5, 98
b	There is too much talk about sex on radio these days	1-5, 98
c	The subject matter covered by radio presenters is usually suitable for the time of day it is broadcast	1-5, 98
d	Swearing and coarse language is acceptable on certain types of radio stations	1-5, 98
e	The on-air opinions of radio personalities should be un influenced by their personal sponsorship deals	1-5, 98
f	Some radio competitions encourage behaviour that is dangerous or anti-social	1-5, 98
g	Language that stereotypes certain groups in the community is inappropriate for radio, regardless of how it is presented	1-5, 98
h	There is too much swearing and coarse language on radio at times of the day when children could be listening	1-5, 98
i	Some radio announcers have too much influence over the community	1-5, 98
j	Some radio content in Australia encourages hatred against particular groups in society	1-5, 98
k	Some radio content in Australia encourages violence	1-5, 98
l	Advertising content on radio should be clearly distinguishable from other radio content	
m	Radio content encourages tolerance of particular groups in the community	
n	The language used on radio is always suitable for its audience	

Social desirability bias: All questions. It is difficult to determine if respondent is answering for himself or agreeing that this is a publicly held view, as mentioned in the introduction to questions 4.1 (a)- (n).

Wording problems: These are numerous and make it difficult to know what the respondent is actually agreeing or disagreeing with. E.g (a) “embarrassing joke” and/or “broadcast” and/or “with permission.” (b) “sex” or “sex on

radio”? (d) “swearing” and “coarse language” – not synonyms, is respondent bracketing both or responding to one or the other? What does respondent mean by both terms? (e) “personal sponsorship” What does this mean to respondent? Is it the same as “sponsorship”? (f) “Some radio competitions”? What does this mean? How many? What is a “competition? What is “dangerous”/“antisocial”? Are these synonyms? (g) What is meant by ‘language’? Does this imply “bad” language, “different” languages, accents ? What does “stereotype” mean? Does the sample understand this word at all? Who are “certain groups”? School teachers?

While it is tedious to enumerate all the examples the principle that is violated here is that too many concepts are bundled into the one item. As a result it is impossible to determine what aspect of the question the respondent is actually answering. As a result the questions generate data that are stripped of their meaning. People do not construe such questions in the same way and the more complex the question the greater the variation in meaning. Within the media research context this has been amply documented by Belson (1981). In a study that was funded by the media industry, media researchers and clients Belson tested respondent understanding 29 media survey questions. His results “provided abundant evidence that each (question) had in fact been subject to a great deal of misunderstanding.” (p. 5)

Negatively worded questions are also apparent. See (b), (e), (f), (g), (h), (i), & (j). Research indicates that people are more likely to agree with negatively worded questions than agree to the same question put in a positive light e.g. rephrasing 4.1f so that it reads: “Some radio competitions encourage behaviour which is safe and good for society” is likely to be less frequently endorsed than its negative expression.

Flow problem: There is no DK (“don’t know”, “no opinion”) category. The Respondent is encouraged to nominate in prescribed categories.

- 4.2 That’s the end of the statements. Can you now think about this next question.
Radio stations broadcast their programs with specific target audiences in mind.
Listeners who are outside a target audience may sometimes be offended by material they hear.

Which of the following statements best describe your view about this? Radio content that offends listeners who are outside a target audience ... READ OUT

Is acceptable in all circumstances

Is acceptable only in some circumstances, or with restrictions

Should never be broadcast, if it might offend listeners outside the target audience

None of these [DO NOT READ OUT] 4

Word problems: Technical jargon appears in the question (“target audience”) which will no meaning or different meanings to the sample. Respondents are asked to respond to a hypothetical event, which is always problematic as there is no reality upon which to answer. To obtain a meaningful answer the question would have to describe a specific event. And because the range of possible events is so large attempts to cover this with umbrella terms (“all/some circumstances”) is very artificial and, ultimately, meaningless. If qualitative research addresses a particular group of respondents (say those who answered “acceptable in all circumstances”) there will invariably be objections to some material – “Oh, I didn’t think you meant that sort of thing.” This, in turn, will be strongly affected by the social desirability of the material.

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available.

4.3 Can you describe the circumstances or restriction you were thinking of?

RECORD VERBATIM

Respondents who answered that offence to a target group may be acceptable in some circumstances in Q4.2 were asked Q4.3. This is laudable as it attempts to flesh out the nature of the circumstances. The report (Figure 15, p. 34) tabulates the different categories of response while exemplars of each category are presented on page 30. These items reinforce the variability of ‘meanings’ in any sample of people and the care that must be taken in drawing conclusions from survey data.

4.4 [IF CODE 2 AT Q4.2] And are there any times of the day that would be **suitable** for the broadcast of content that might offend some listeners? I will read a number of time slots out – please indicate which might be suitable. READ OUT, MULTI

Breakfast 6-9 AM	1
Morning 9AM- Noon	2
Afternoon – Noon to 3pm	3
Drive time – 3-6pm	4
Early evening 6-9pm	5
Late evening 9pm to midnight	6
Between midnight and 6am	7
[IF NONE INDICATED ABOVE] Or, no times are suitable for the broadcast of this type of content	8

Don't know – DON'T READ OUT	98
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While the structure of this question is appropriate the response is fairly self evident and reflects upon the overwhelming sense of the question which precedes it i.e. the notion of “offence” As might be anticipated the appropriate time is when most respondents feel fewer people are listening (because they are watching television?) i.e. late evening. But it is comforting to have data which support expectations.

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available.

4.5 [ALL] To what extent, if at all, are you concerned that children under 15 years of age might hear content on radio that is **not suitable** for children? Are you... READ OUT MULTI

Very concerned	1
Moderately concerned	2
A little concerned, or	3
Not at all concerned	4
DO NOT READ Don't know	98

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available.

While straightforward (although there is a social desirability bias), the question is interesting because as a researcher I would anticipate that the bulk of the sample would express concern. And as Table 8, p. 37, shows, this is the case. What is somewhat surprising is that about 26% of the sample say they are “Not at all concerned.” The result neatly demonstrates the difficulty in making sense of survey data. Is their response because they are genuinely undisturbed by a child’s media consumption or because they feel there is no objectionable content on radio or for some other unknown reason ?

4.6 What types of radio content do you think are **not suitable** for children to hear? PROMPT WITH “Anything else?”

RECORD VERBATIM

Q4.6 was asked of those respondents who nominated some concern in 4.5.

There is always a problem about aggregating individual responses into different categories, so some subjective bias is inevitable. This is not a criticism. But the wide range of responses again endorses the diversity of community views (see Fig. 19, p. 39). However while the question does try and focus on “radio content” the answers to the question are almost certainly affected by a social bias i.e. the answers reflect everything that adults would be expected to find inappropriate for children to hear, not just on radio.

5.1 I would now like to ask a few questions about news and current affairs. Can you tell me how important each of the following are **to you** as **sources of news and current affairs** information? Firstly, READ OUT MEDIUM. Is it important to you as a source of news and current affairs information? [IF YES] And is that extremely important, very important, or just fairly important?" [IF NO] And is it not very important, or not at all important to you?"
CONTINUE WITH OTHER MEDIA

(IF NECESSARY, SAY "Commercial radio stations have advertisements")

(IF NECESSARY, SAY "ABC radio includes Radio National, Classic FM, News Radio, and regional or city ABC radio stations"

(IF NECESSARY, SAY "Community radio stations are stations operated by local communities, youth, religious, ethnic or indigenous communities. These stations have sponsorship announcements but not traditional advertising").

ROTATE MEDIA 1-7, LEAVE 8 LAST.

INTERVIEWER NOTE: IF 8 QUERIED, SAY "Here we mean things like blogs, and specialist/independent news, current affairs & discussion sites, e.g. crikey.com, webdiary.com,au and newmatilda.com."

MEDIA	1 EXTREMELY IMPORTANT 2 VERY IMPORTANT 3 FAIRLY IMPORTANT 4 NOT VERY IMPORTANT 5 NOT AT ALL IMPORTANT 98 DON'T KNOW
Commercial radio, via your radio or through the internet	1 – RECORD RATING 1-98
Commercial TV, via your TV set or through the internet	2 – RECORD RATING 1-98
Newspapers, via traditional reading or through the internet	3 – RECORD RATING 1-98
ABC radio, via your radio or through the internet	4 – RECORD RATING 1-98
ABC TV, via your TV set or through the internet	5 – RECORD RATING 1-98
Community radio, via your radio or through the internet	6 – RECORD RATING 1-98
Other radio, TV or newspaper services, including via the internet	7 – RECORD RATING 1-98
And finally, the internet, for accessing internet-only news and current affairs sources from Australia or overseas	8 – RECORD RATING 1-98

Wording problem: The rule of thumb, in designing survey questionnaires, is to keep the questions as short as possible. The aim is to minimise the respondent's cognitive load. This question is long and complex. However the research company is obviously trying to find an acceptable compromise between the cost of obtaining such data and its quality.

6.1 [ALL REGULAR COMMERCIAL AM & FM LISTENERS CODE 1 OR 2 AT Q1.3] For the next series of questions I want you to think only about the **commercial radio stations** you listen to, that is radio stations that have advertisements, and the **current affairs** information they may offer.

So, thinking about **current affairs** programs on commercial radio, and **the content** rather than the advertising that may feature throughout the programming, how important is it to you that the actual **content** of current affairs programs **is free from commercial influence**? Is it... [READ OUT]

(IF NECESSARY) By commercial influence, we mean:
Where promotional deals between advertisers or sponsors and the presenters or radio stations influence the selection of material for broadcast

(IF NECESSARY: Current affairs content includes on-air opinions, interviews, analysis, commentary or discussion about current social, economic or political issues. It includes talkback programs.)

Extremely important	1
Very important	2
Fairly important	3
Not very important, or	4
Not at all important	5
Don't know - DO NOT READ OUT	98

The comments below apply to Qs. 6.1-6.4

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available.

There should be a filter question to determine salience of the issues explored in Q6.1 and following.

Wording problem: The question is long and complicated. Phrases such as “promotional deals,” “current affairs information,” “actual content,” “clear distinction,” “commercial arrangements” etc. would not have a uniform meaning to respondents. Hence there is difficulty in interpreting results.

Social desirability bias: The degree to which the questions tap more general views of advertising and the media is unknown. Hence the direct relevance to commercial radio cannot be specified.

6.7 [TALKBACK LISTENER – IE CODE 1 AT 6.5 OR 6.6] How important to you are radio talkback programs in informing you of social, political or economic matters? Are they...
READ OUT

Extremely important	1
Very important	2
Fairly important	3
Not very important, or	4
Not at all important	5
Don't know - DO NOT READ OUT	98

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available.

Wording problem: It is probably difficult for people to ascribe importance to radio talkback programs in separation from all the other media and non-media influences on their “social, political or economic” impressions.

6.8 [TALKBACK LISTENER – IE CODE 1 AT 6.5 OR 6.6] Radio personalities with personal sponsors **must make on-air disclosures to their listeners when they are discussing material about their sponsors.** Have you heard a disclosure announcement during a talkback program on commercial radio? This might be an announcer or personality saying, ‘Company X is a sponsor of mine’... [READ OUT]

Yes	1
No	0
Don't know	98

Flow problem: There should be a filter question to establish salience. Giving respondents the opportunity to answer “don’t know” is an ex post way of dealing with this.

Wording problem: “Radio personalities,” “personal sponsors,” “disclosures” are probably not uniformly understood. Again, difficult to know which part of

the question is eliciting the response. Indeed the summary of verbatim responses (Figure 27, p. 55) seems to support this.

6.10 [CODE 1 AT Q6.8] And how useful are these on-air disclosure announcements in informing you that what the announcer is saying might be influenced by the interests of a commercial sponsor? Are they... [READ OUT]

Extremely useful	1
Very useful	2
Somewhat useful	3
Not very useful, or	4
Not at all useful	5
Don't know - DO NOT READ OUT	98

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available. This has the effect of “forcing” choice.

6.11 [CODE 1 AT Q6.8 How **important** is it to you that on-air disclosure announcements be made at the **same time** that an announcer mentions a commercial sponsor? Is it... [READ OUT]

Extremely important	1
Very important	2
Fairly important	3
Not very important, or	4
Not at all important	5
Don't know - DO NOT READ OUT	98

Flow problem: There is no DK (“don’t know”, “no opinion”) category. Respondents are not informed that this choice is available. This has the effect of “forcing” choice.

Complaints

7.1 [ALL REGULAR COMMERCIAL AM & FM RADIO LISTENERS – CODE 1 OR 2 AT Q1.3] The next few questions relate to making complaints about inappropriate content on

commercial radio. Which one of the following statements best describes you? READ OUT, ROTATE 1-3 BELOW, SINGLE RESPONSE

I have made a complaint about something inappropriate on commercial radio	1 - CONTINUE
I have thought about making a complaint, but have never gone through with it	2
I have never thought about making a complaint	3 – GO TO Q7.6
None of these – DO NOT READ OUT	4 – GO TO Q7.6

Wording problem: A time period should have been specified in 7.1.1

General comment: This is a straightforward question that asks the respondent to recall one or more past behaviours (7.1.1) or reflecting on the possibility of that behaviour (7.1.2). As such it provides an opportunity to examine the relationship between the results of the survey data with the known level of complaints as recorded by ACMA and commercial broadcasting stations i.e. comparing the responses to 7.1.1 to complaints records. As such it is a rough guide to the validity of the survey data. The survey results show that 4% of commercial radio listeners have, at some time, made a complaint.

However for the purposes of the argument let us take conservative audience figures. The number of metropolitan commercial radio listeners aged 15 years and over in Australia is estimated at 7.0 million (Commercial Radio Australia, 2010). If 4% of this figure registered a complaint the total number of complaints is approximately 280,000 (assuming one complaint per person). To get a more precise estimate 1.3% of survey respondents said they complained to ACMA, which translates to approximately 3,600 complaints. However the survey results indicate that this is probably an underestimate because “within the ‘make a complaint to someone else’ category, a significant number of radio listeners make mention of an *ACMA-like* organisation such as ‘broadcasting media’, ‘authorities’, ‘boards’ “ (p. 29) This figure is estimated to be 9.6% which translates to approximately 26,900 complaints. Even taking a conservative approximation of audience numbers, say 5 million, does not significantly change the magnitude of these estimates.

Complaints figures from ACMA and commercial broadcasters cannot be reconciled with these estimates. The actual number of complaints is so far below extrapolations from the survey findings that the validity of the survey results must be questioned.

A behavioural explanation of these results may lie in the concept of *Acquiescence Bias*, where respondents simply show a tendency to agree to or endorse positions, regardless of the content of those positions. If so this also provides an additional caveat to the overall results of the survey.

7.2 [CODES 1 OR 2 ABOVE] Was your area of complaint in relation to a radio advertisement or other program content?

Radio advertisement	1
Other program content	2
Don't know / can't remember	98

7.3 [CODE 1 AT Q7.1] Were you satisfied with the way your complaint was handled?

[IF MORE THAN ONE COMPLAINT SAY "Were you satisfied with the way your last complaint was handled?"]

Yes	1 – GO TO Q7.6
No	0 – CONTINUE

7.4 [CODE 0 ABOVE] Why weren't you satisfied?

RECORD VERBATIM – GO TO Q7.6

Wording problem: Given that the timing of the complaint is unknown, the ability of the respondent to correctly recall this information is suspect. Similarly the measure of satisfaction in relation to the "last complaint" made by the respondent is problematic. As the report notes the base sizes here are small.

7.5 [CODE 2 AT Q7.1] What were the reasons that you did not go ahead and make a complaint? DO NOT READ OUT, MULTI

I wasn't sufficiently offended or concerned	1
I didn't have time	2
I just forgot about it	3
I didn't think my complaint would be taken seriously	4
I didn't know how to go about making a complaint	5
Just changed stations	6
Just turned the radio off	7
Not worth the effort/trouble	8
Didn't have all/ the right contact information	9
Other [RECORD VERBATIM]	10
Don't know	98

No comments on question design. Results should be evaluated with the caveats mentioned above in mind.

7.6 [ALL] How would you go about making a complaint about inappropriate content heard on a commercial radio station? DO NOT READ OUT, MULTI

Telephone the radio station	1
Write a letter to the radio station	2
Email the radio station	3
Go to station website and fill out an online complaint form	4
Fax the radio station	5
Make a complaint to the Australian Communications and Media Authority (ACMA)	6
Make a complaint to someone else [RECORD VERBATIM]	7
Other [RECORD VERBATIM]	8
Don't know	98
Would not make a complaint	99

Wording problem: The question invites the respondent to think of a hypothetical behaviour in response to a hypothetical event. Such questions have little predictive value.

7.7 [ALL] When listening to commercial radio, have you heard any announcements that tell you about the Commercial Radio Codes of Practice and what to do if you would like to make a complaint about something you have heard? If yes, how recently have you heard it? SINGLE

Yes – within the last week	1
Yes – within the last month	2
Yes – 2 to 3 months ago	3
Yes – faintly remember something	4
No, never heard	5
Don't know	98

No comments on question design.

Summary

This survey was intended to capture a range of data on radio listening behaviour and community concerns about offensive radio content. This makes the a priori assumption that there are grounds for such concerns. As the 2005 Taskforce on Reducing Regulatory Burdens on Business suggests, governments should not act to address “problems” until a case for action has been clearly established (*Review of the commercial radio standards*, ACMA, Feb., 2010, p. 12). The behavioural evidence to support this assumption is questioned.

Using a standard survey methodology a questionnaire is administered, via telephone, to a random sample of Australians aged 15 years and over. The sampling methodology is generally sound. However the questionnaire administered has numerous design flaws. These relate to significant problems in the wording of questions, which make responses to these questions difficult to interpret. The structure of the questionnaire can also lead respondents to answer questions in a way that indicates issues have salience for them when, in fact, they may not. There are other factors, such as the press to give socially acceptable responses, which may have influenced community responses to the questions. These should have been taken into account in designing the questionnaire. In addition, responses in the questionnaire, which indicate a level of community action, are not supported by comparable data of what people actually do.

As a result there are substantive grounds for doubting the validity of the survey results and their translation into public policy.

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2.00 Ipsos report “Listener attitudes to advertising, sponsorship and influence on commercial radio”

The research objectives of this study were to examine the extent to which radio listeners could distinguish advertising and differentiate it from various forms of program material. Views on advertising and sponsorship were also canvassed.

The methodology employed attempted to gain a realistic assessment of audience responses by asking the sample to listen to various audio clips and then measuring each respondent’s evaluation of what he or she heard. This approach stands in contrast to the previous study, “Community attitudes to radio content.” In this study respondents were evaluating abstract and general concepts, such as “radio content”, “offensive” broadcast material etc., whereas in the present study respondents actually heard broadcast material on their computer speakers. Secondly, the data gathering mechanism was an on-line survey questionnaire completed by the respondent. Seven audio clips were embedded in the questionnaire. This meant that there was no interviewer who could contribute to survey error. All respondents were exposed to the same questions, delivered in the same way. An inevitable source of bias is that the respondents are attending to the audio material in a manner that does not reflect their characteristic listening behaviour. As numerous studies have noted, radio is often used as background, while the listener is doing other things. In this study the respondents will necessarily be more vigilant and judgemental than usual. Similarly, the advertisements are not presented within the context of a conventional broadcast. However these are not considered to be critical biasing factors given that the study attempted to estimate population statistics via a large sample.

The sampling methodology was adequate, respondents being drawn from a large consumer panel. While there is obviously self-selection this is also not considered to cause significant bias.

This report will be evaluated on the same criteria offered in Section 1.00 i.e. wording and flow problems and the intrusion of social bias. Each of the questions, other than those used for classification, are considered below.

4.1 Which of the following descriptions do you think best apply to the clip you've just heard?
 You can indicate more than one response. MULTI RESPONSE

ROTATE CATEGORIES

News, information or current affairs	1
Presenter's opinion, commentary or discussion	2
Interview with expert or spokesperson	3
Talkback caller discussion	4
Advertising or sponsor promotion	5
None of the above	6
Unsure/don't know	98

Wording problem: There may be cause for thinking that some of the terms used in this response table may be ambiguous. However Figure 4, p. 15, shows that clip A is overwhelmingly judged to be "advertising or sponsor promotion." Had there been ambiguity a wider spread would be anticipated. So the evidence suggests that the categorisations above are understood.

Flow problems. There is a DK category clearly available to all respondents. A filter question is unwarranted. There are no issues with flow.

Social desirability is also not a confounding factor simply because it is doubtful that a clear social norm exists for this judgement.

4.2 To what extent do you think the **part of the clip** about Darrell Lea chocolates is paid advertising (as opposed to other program material). Please indicate a number from 1 to 5, where:

- 1= The material is **clearly** advertising, and
- 5= The material is **clearly** other (non-advertising) program material

Clearly advertising	1
More like advertising than other program material	2
Could be advertising or other program material / couldn't really tell	3
More like other program material than advertising	4
Clearly other (non-advertising) program material	5
None of the above	6

Flow problem: There might be a case for arguing that people who endorsed "none of the above" or "Unsure/don't know" in the previous question should skip this question. Otherwise the question is straightforward.

4.3 [IF CODE 1 OR 2 ABOVE] What were the **particular features** of that **part of the clip** that led you to describe it as '[INSERT RESPONSE FROM Q4.2 IE EITHER CODE 1 OR 2]'?

PROGRAMMER'S NOTE: INSERT TEXT BOX

4.4 [IF CODE 4 OR 5 ABOVE] What were the particular features of that **part of the clip** that led you to describe it as '[INSERT RESPONSE FROM Q4.2 IE EITHER CODE 4 OR 5]'?

PROGRAMMER'S NOTE: INSERT TEXT BOX

This is an open-ended question where the respondent types in their response. The categorisations of the responses (Table 2, p. 16) seem reasonable and are standard marketing research practice. However, as in the previous discussion (section 1.00) the point of interest is how differently respondents come to the same conclusion.

These questions are repeated six times as the respondent evaluates each of the remaining audio clips.

The methodology for evaluating the clips is fair and reasonable.

Probability

10 To what extent do you believe that advertisers or sponsors use **commercial radio** in any of the following ways... ROTATE STATEMENTS. SINGLE RESPONSE.

1. I believe this happens
2. I believe this is **likely** to happen
3. I believe this is **unlikely** to happen
4. I believe this **does not** happen
98. DON'T KNOW / NONE OF THESE

a	Advertisers or sponsors influence the content of current affairs commentary, discussion or talkback on commercial radio	1-4, 98
b	News stories are omitted from news bulletins on commercial radio to 'please' sponsors or advertisers	1-4, 98
c	Talkback radio presenters on commercial radio are paid by advertisers or sponsors for favourable comments	1-4, 98
d	Talkback callers on commercial radio are screened to favour advertisers or sponsors	1-4, 98

10.1 (IF ANSWERED 3 OR 4 ABOVE FOR STATEMENT **c** ONLY): What are your reasons for believing that talkback radio presenters are paid by advertisers or sponsors for favourable comments [INSERT APPLICABLE: IE EITHER CODE 3 'is unlikely to happen' OR CODE 4 'does not happen']?

Flow problem: A filter question may have been appropriate here to avoid a priming effect. But as the respondent can clearly see the "don't know" category this effect is probably minimal.

Social desirability bias: Response may reflect media attention to these issues.

Otherwise the question seems fair. Note that the report does give results of the open-ended question, probably because of the small base sizes.

Attitudes

11. Please indicate the extent to which you agree or disagree with the following statements about **commercial radio** ... ROTATE STATEMENTS. SINGLE RESPONSE.

1. STRONGLY AGREE
2. AGREE
3. NEITHER AGREE NOR DISAGREE
4. DISAGREE
5. STRONGLY DISAGREE
98. DON'T KNOW

a	Advertising on commercial radio doesn't bother me, because it's a business that relies on advertising to operate	1-5, 98
b	Advertising content on radio should be clearly distinguishable from other radio content	1-5, 98
c	Advertising interrupts my enjoyment of commercial radio	1-5, 98
d	Integrating advertising with other program content on commercial radio is acceptable so long as advertisers are identified at least once during the program	1-5, 98
e	It is annoying when presenters interrupt their programs with disclosure announcements to make listeners aware of their sponsorship arrangements	1-5, 98
f	Blurring of advertising and other program material is inevitable on commercial radio	1-5, 98

My evaluation is similar to Q.10 (above).

Concern

Certain practices may affect the ability of some radio listeners to distinguish advertising from other program material. We're interested in your opinion on a range of practices that may be used by commercial radio to promote products and services.

12.1 Can you please indicate how you feel about each of the following advertising practices on **commercial radio**?

1. NOT AT ALL CONCERNED
2. MODERATELY CONCERNED
3. VERY CONCERNED
98. DON'T KNOW

ROTATE

a	A presenter voices advertising from a script provided by a sponsor in between other advertisements during an ad break	1-3, 98
b	A presenter voices advertising from a script provided by a sponsor in the course of their commentary or discussion on current social, political or economic issues	1-3, 98
c	Interview time with a presenter is purchased by an advertiser to promote their products and services	1-3, 98
d	A guest presenter promotes their business by hosting a program segment on commercial radio (e.g. a travel segment)	1-3, 98
e	A presenter gives favourable commentary about a company or business during a talkback program because it is a contractual obligation for them to do so under their sponsorship arrangement	1-3, 98
f	A traffic reporter voices advertising directly after a traffic report	1-3, 98
g	A company sponsors a news report on commercial radio	1-3, 98
h	A finance report (e.g. stock market report) is fully produced by a bank or other investment institution for broadcast by a commercial radio station as part of a news report	1-3, 98
i	Advertising that is integrated with the content of a program in a way that is not distinguishable from the other content	1-3, 98
j	A sponsor provides products as giveaways to commercial radio listeners	1-3, 98

12.2 [IF CODE 2 OR 3 @ ANY OF (b), (c), (d), (e), (h) or (j) ABOVE

(a) You found the following advertising practices on commercial radio to be 'moderately' or 'very' concerning. Would you be less concerned about these practices if the station or presenter made you aware of the commercial arrangement, not at the time the advertising occurred, **but at some other point in the program?**

	No, this would not change my view on these practices	Yes, my view would change to 'moderately concerned'	Yes, my view would change to 'not at all concerned'
Moderately concerned about... LIST APPLICABLE PRACTICES IN ROWS BELOW IE CODE 2 @ ANY OF (b), (c), (d), (e), (h) or (j) @Q12.1	0		2
Very concerned about... LIST APPLICABLE PRACTICES IN ROWS IE CODE 3 @ ANY OF (b), (c), (d), (e), (h) or (j) @Q12.1	0	1	2

NEW SCREEN

(b) Continuing with the advertising practices you found to be of concern. Would you be less concerned about these practices if the station or presenter made you aware of the commercial arrangement **at the time the advertising occurred?**

	No, this would not change my view on these is practices	Yes, my view would change to 'moderately concerned'	Yes, my view would change to 'not at all concerned'
Moderately concerned about... LIST APPLICABLE PRACTICES IN ROWS IE CODE 2 @ ANY OF (b), (c),	0		2

(d), (e), (h) or (j) @Q12.1			
Very concerned about... LIST APPLICABLE PRACTICES IN ROWS IE CODE 3 @ ANY OF (b), (c), (d), (e), (h) or (j) @Q12.1	0	1	2

Wording problem: When discussing the methodology used in this study the point was made that a particular strength is the way concrete stimuli provide the bases of judgements and attitudes. In 12.1 and 12.2 there is the introduction of hypothetical circumstances and the reappearance (*vis à vis* the material in section 1.00) of ambiguous words (e.g. “current social”) and double-barrelled questions e.g. 12.1e. The simpler questions (e.g. 12.1f and g) allow greater confidence in the interpretation of the results.

Social desirability bias: Response may reflect media attention to these issues.

While these are both strong caveats the methodology used in 12.2 is imaginative.

Summary

The major research objective was to determine the extent to which radio listeners could distinguish advertising from other radio program material e.g. talk back format, live read, commentary etc. The mechanism for achieving this was to embed audio clips into an on-line questionnaire completed by a national sample of commercial radio listeners aged 17 years and over. As a result respondents were answering a standardised suite of questions for each of the seven audio clips presented. Each clip could be regarded as a concrete stimulus in the sense that it was a section of broadcast material selected from a radio program that had gone to air. Respondents were not primarily answering questions about aspects of broadcasting material (e.g. advertising) in general.

A secondary objective was to assess the attitudes to and concerns listeners may have about advertising and sponsorship.

In my view the major objective of this study was achieved. The results provide useful information about the cues listeners use in identifying and discriminating between advertising and other broadcast material.

Questions to answer the secondary objective were partially effective, particularly those addressing the concerns people may have with different formats in which

advertising is presented. However some of the caveats raised about the questionnaire used in the “Community attitudes to radio content” study can also be applied to question construction in the latter parts this questionnaire i.e. the questions designed to measure “probability” and “attitudes.”

Attachment 1

STANLEY GLASER
Curriculum vitae

PROFESSIONAL AFFILIATIONS

Foundation member, Australian Psychological Society.

BOARD POSITIONS (Past)

MGSM Pty Ltd

The Fred Emery Institute

Chairman, Rooster Notification Technology (Aus.)

Present

International Advisory Board, Emerald Group Publishing

EDUCATION

1963 B.A. Sydney University.

1976 Ph.D. University of N.S. W.

POSITIONS HELD

2011 Company director and consultant

2007- 2011 Professor of Marketing, College of Business, University of Western Sydney

2003-2006 Professor of Management and Director of Research, Sydney Graduate School of Management, University of Western Sydney

1999-2003 Company director and consultant

1991-1999 Professor of Management, Graduate School of Management, Macquarie University

1990 Associate Professor of Management, Graduate School of Management, Macquarie University

1979 Senior Lecturer, School of Marketing, Uni. of N.S.W

1970 Lecturer in Behavioural Sciences, School of Marketing, University of N.S.W.

- 1969 Postgraduate Research Scholar, School of Marketing, University of New South Wales.
- 1967 Senior Project Manager, Anderson Analysis Pty. Ltd., Sydney.
- 1966 Senior Research Psychologist, Psychological Research Department, George Patterson Pty. Ltd.
- 1966 Senior Research Executive, William Schlackman Ltd., London, England.
- 1965-66 Research Officer, Beecham Group Ltd., Middlesex, England
- 1963-65 Research Executive, B.E. Thomason Research Pty. Ltd., Sydney

While in the private sector my responsibilities were mainly the design, administration and conduct of applied industrial and social research projects. However with the Beecham Group this extended to advising the pharmaceutical division on the conduct and analysis of clinical trials.

VISITING POSITIONS

- 1986 Fellow, Templeton College, Oxford University, England.
- 1977 Professor of Management, Cranfield School of Management, Cranfield University, England.
- 1976 Professor of Economic Psychology, Stockholm School of Economics, Sweden.

EDITORIAL BOARDS

Past: European Journal of Marketing, Management Cases Quarterly

Present: Management Decision, Journal of Management History

Book review editor: Journal of Management History

CONSULTING

For over forty years I have acted as a consultant to an enormous range of organisations, in both the private and public sector, in Australia and overseas. These have ranged from multinationals, such as Imperial Tobacco, Cadbury, Roche, Geigy, Esso, I.B.M., American Express, to large local firms such as TNT,

Westpac, Communication Credit Union. B.O.C., Wright Heaton, Buspak and various government and semi-government bodies such as the Dept. of Health, National Capital Development Commission, Meat and Livestock Commission (U.K.), Tasmanian Tourist Bureau, TAB (N.S.W. & Vic.), Telstra, etc. This has encompassed market and social research, personnel appraisal and development, stress management, professional training, executive counselling (generally via psychiatric referral), acting as an expert witness for Trade Practices and other commercial matters, strategic assessment and implementation for both private and public sector clients etc.

RESEARCH AND PUBLICATIONS

Major Research Reports

During my career I have written several hundred research reports, the bulk being of a proprietary nature. Some, however, are available through Unisearch Ltd. while others are in the public domain. Some earlier reports are listed below.

Gosford-Wvong Economic Base/Marketing Study. Phase 2: The Industrial Relocation Study. Unisearch Ltd., 1974 (with K. LeLievre).

Gosford-Wvong Economic Base/Marketing Study. Phase 8: The Household and School Leaver Study. Unisearch Ltd., 1974 (with K. LeLievre).

Cost Comparison Study and Market Survey into the Proposed Commercial Exploitation of the Hovapic Excavating Machine. Unisearch Ltd., 1975, (with L. V. O'Neill).

Consumer Attitudes Towards the "Big M" Concept. Unisearch Ltd., 1978.

A Summary of the Attitudes of Major Client Groups Towards the Royal Agricultural Society Unisearch Ltd., 1979.

Self Care and the Consumer- Preliminary Report. Unisearch Ltd., 1980 (with D. Darby & I. Wilkinson).

Reef Tourism: A Socioeconomic and Attitudinal Study. Unisearch Ltd., 1982 (with I. Wilkinson).

Public domain reports include;

Young People and Driving, Queensland Road Safety Council. 1967.

Community Attitudes in North Sydney, prepared on behalf of Plant Location International for the North Sydney Planning Consultants and North Sydney Council. 1971.

The Social Needs of Adolescents, National Capital Development Commission, 1975.

Resident Satisfaction with Medium Density Housing in Canberra and Queanbeyan, National Capital Development Commission. 1975 (research design and questionnaire only).

A Survey of Aspects of the Monitoring of the Safety of Drugs, Adverse Drugs Reaction Advisory Committee, 1984 (with L. Ash).

Marketing Audit Report, Vols. 1 & 2, Tasmanian Department of Tourism, 1984 (with L. Brown).

More recent reports include:

Marketing Audit of State Transit. A report prepared for the State Transit Authority of NSW, June, 1998 (with R. Hall).

An Evaluation of the PwC/Mastercard Cardholder Demand Study. A report prepared for The Reserve Bank of Australia, August, 2002

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BMCC Staff Attitudes Study. A report prepared for the Blue Mountains City Council, November, 2004

The application of value chain management (VCM) in Australian Industry: A focus on the information technology (hardware) industry. A report prepared for AWA Ltd. with a \$45,000 UWS Research Partnerships Program Grant, 2007. (With D. Walters)

BMCC Staff Attitudes Study: Comparing 2004 to 2008. A report prepared for the Blue Mountains City Council, June, 2008

Papers

"Models of the Sales Effects of Advertising", Australian J. Marketing Research, 4, 1971, pp. 40-44.

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"A Study of Health Care in Australia". Proceedings of the 5th General Assembly of the World Federation of Proprietary Medicine Manufacturers, 1979, pp. 32-41 (with D. Darby, R. Layton & I. Wilkinson).

"A Systems Foundation for Alderson's Functionalism". In Fisk, G., Nason, R.W. & White, P.D. (eds.), Macromarketing: Evolution of Thought, Boulder: University of Colorado, 1980, pp. 71-81 (with M. Halliday).

"Everyday Ills - Who Gets What and How Do They Treat It?", The University of New South Wales Quarterly, March, 1980, pp. 8-11 (with D. Darby & I. Wilkinson).

"Organisations as Systems", Human Relations, 33, 1980, pp. 917-28 (with M.I. Halliday).

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"The Stability of a Complex System," Systems Practice, 4, 1991, pp. 151-159 (with M. Halliday).

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