

**Submission to the Australian Communications and Media Authority**  
**Discussion Paper *Impartiality and commercial influence in broadcast news***

**10 March 2020**

## **1. Executive Summary**

- ASTRA acknowledges the importance of maintaining high editorial standards in the preparation and presentation of news and current affairs. This is important to our viewers, and trusted and reliable news and information is an important part of the product offering and value proposition of subscription television.
- This is why the ASTRA Codes of Practice contains robust standards to uphold community expectations regarding impartiality and commercial influence. Existing requirements for disclosure of cross-media ownership arrangements are also working well.
- Historical data demonstrates that subscription television news and current affairs providers comply with these standards. Should there be a failure to adhere to the standards, the ACMA already has the ability to investigate compliance with those standards and apply remedies, including levy of substantial penalties.
- There is nothing in the ACMA's discussion paper that provides evidence that these standards are failing or that there is a groundswell of consumer concern regarding the quality and integrity of news and current affairs on subscription television.
- The ACMA's paper includes reference to consumer research which has significant shortcomings as an evidence base for policy-making in that it fails to differentiate between sources of media and between concern about perceived problems and the actual occurrence of those problems.
- There is also repeated reference to third-party research that takes in all sources of media. Given the role of the digital platforms and social media networks in the distribution of fake news and disinformation, it is extremely concerning that the ACMA has sought to include these studies in their evidence base regarding regulated platforms.
- Of considerable concern, the ACMA has sought to minimise the importance of the evidence provided by complaints and investigations data which demonstrates compliance by industry with existing Code and legislative obligations and low levels of consumer concern.
- In 2019, subscription TV provided over 113,000 hours of high quality news and current affairs , all produced to an extremely high standard, ensuring subscription TV remains a trusted source for Australian consumers in an environment in which unregulated sources of news and information proliferate

## **2. Background**

ASTRA is the peak industry body for subscription media in Australia. ASTRA was formed in September 1997 when industry associations representing subscription (multichannel) television and radio platforms, narrowcasters and program providers came together to represent the new era in competition and consumer choice. ASTRA's membership includes the major subscription TV operator, as well as over 20 independently owned and operated entities that provide programming to these platforms, including Australian-

based representatives of international media companies, small domestic channel groups and community-based organisations.

ASTRA's members provide a diverse range of news, information, sport and entertainment programs which deliver significant social benefits to a broad cross-section of the Australian community. In 2020, one third of Australians subscribe, along with millions more who watch subscription content in public venues.

### **3. Introduction**

ASTRA welcomes the opportunity to respond to the ACMA's Discussion Paper *Impartiality and commercial influence in broadcast news*. ASTRA's members include providers of 24-hour news and information channels, providing a diverse array of news, information and current affairs programming.

In 2019, subscription TV provided over 113,000 hours of news and current affairs, all produced to an extremely high standard, ensuring subscription TV remains a trusted source for Australian consumers in an environment in which unregulated sources of news and information proliferate.

As acknowledged by the ACCC in the Final Report of its Digital Platforms Inquiry, the production and delivery of news and information is under pressure from seismic changes in the competitive landscape.

Therefore we are strongly of the view that this should lead to a conclusion that industry regulation needs to be flexible and responsive to achieve policy objectives, in order to ensure trusted local news sources continue to be supported by commercial models.

It should not, as it appears to in the discussion paper, lead to a proposition that further restrictions are required on how trusted local news media can respond to sustained pressure from unregulated competition.

As acknowledged by the ACCC in the Final Report of Digital Platforms Inquiry, regulated media face a substantial competitive disadvantage compared to digital platforms given the regulatory disparity across platforms. It is regrettable that the ACMA appears to be considering intervention to entrench that disparity, by contemplating an increased regulatory burden on the already regulated platforms that are already held to – and meet-high standards.

That the ACMA is basing this proposition on a deficient evidence base is of even greater concern.

This submission is structured as follows:

Section 1	Executive Summary
Section 2	Background
Section 3	Introduction
Section 4	ACMA commissioned research
Section 5	Third-party research
Section 6	Investigations and complaints data
Section 7	Conclusion

## 4. ACMA commissioned research

ASTRA, jointly with Free TV, commissioned a review of the research materials released by the ACMA in conjunction with the Discussion Paper. That analysis, conducted by Resolve Strategic ([Attachment A](#)), demonstrates significant shortcomings in the research material such that it cannot be relied upon to properly inform policy-making in relation to impartiality and commercial influence in news and current affairs. Resolve's conclusion is that "the research study does not yet provide a complete or reliable evidence-base on which to determine" regulatory action.<sup>1</sup>

Key among the shortcomings identified were that the research does not:

- Conduct any content analysis to assess the nature, prevalence or severity of instances of impartiality, or commercial influence
- Assess any specific safeguards or instances of compliance
- Include expert views of industry practitioners on industry practices
- Very rarely differentiates between news and current affairs, or between channels, platforms, providers or programs; and
- Does not clearly define either impartiality or commercial influence.<sup>2</sup>

Resolve undertook an analysis of the three key streams of ACMA research – the literature review undertaken by the Centre for Media Transition, the qualitative research and the quantitative research. It is worth considering Resolve's assessment of these three streams separately.

### 4.1 Literature review

Resolve considered the literature review conducted for the ACMA by the Centre for Media Transition and noted that review demonstrated a lack of recent and relevant studies specific to the topics being considered by the ACMA. Because of this, Resolve has concluded that the literature review is limited in its ability to address the questions posed by the ACMA – the research simply does not exist in a recent form for Australia.<sup>3</sup> Resolve also noted that very few of the sources it considered breakdown consumer expectations and opinions by media source.

Indeed, the literature review highlights significant research and knowledge gaps which were not addressed by the further quantitative and qualitative research commissioned by the ACMA:

- What role do personal biases have on perceived impartiality?
- How important are perceived commercial influence and impartiality in people's lives?
- In the context of reduced revenues and downsizing in traditional media (broadcast and print), is there any change in public attitudes towards commercial content if it is deemed critical to the ongoing provision of these frequently used channels?
- Do consumers perceive any value or derive benefits from commercial content, including information and funding for other content?

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<sup>1</sup> Resolve, p 11

<sup>2</sup> Resolve, p 7

<sup>3</sup> Resolve, p 17

- To what extent, if at all, is the rise of ‘news’ delivered by digital and social media colouring views of the news media generally?
- In the context of the topical debate surrounding free speech in Australia, what is the appetite of Australians for further regulation and enforcement in the area of impartiality?<sup>4</sup>

## 4.2 Quantitative research

Resolve considered the quantitative research commissioned by the ACMA and identified a number of concerns which combine to severely constrain the usefulness of the data in a policy discussion.

Resolve notes the survey questions appear to have been designed in isolation from the desk and qualitative research. Resolve also notes that:

- only five questions were asked
- the questions collect information about perceptions of impartiality and commercial influence, not the reality
- the questions of perception were not bounded by time limits
- the questions were based on unreliable perceptions of hypothetical scenarios, and
- that the results were not broken down by source of media.

Resolve concludes that “these limitations will impact [the data’s] ability to reliably address key information gaps needed for evidence-based policy making” and that interpretation is therefore problematic.<sup>5</sup>

Of primary concern, again, is the lack of any breakdown of the data in terms of sources of media. As noted elsewhere in this submission, people use multiple media sources and have differing expectations and experiences of each. Research findings which include perceptions and attitudes to all media lead to uncertainties about whether people are answering on behalf of specific sources or media in general, or about the best of worst they have experienced, or an amalgam of them. It would be extremely problematic to base policy discussions for specific media platforms on general results for all media.

We also highlight that the research questions did not ask whether impartiality or commercial influence problems are actually taking place. Instead, they ask about concerns in a hypothetical sense. Resolve also note that the questions do not limit responses in time and could be measuring concerns across all channels over the lifetime of the respondent.<sup>6</sup>

Whilst there was one question in the survey regarding change in commercial influence, Resolve suggests caveats should be placed on asking respondents to rate changes over long periods of time due to false recall effects. “It is far more preferable to track such opinions over time so that respondents are answering on the basis of current experience at two times.”<sup>7</sup>

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<sup>4</sup> Resolve, p 19

<sup>5</sup> Resolve, p 26

<sup>6</sup> Resolve, p 29

<sup>7</sup> Resolve, p 31

### 4.3 Qualitative research

A key finding of Resolve's review of the qualitative research commissioned by the ACMA was that the consumers that took part were not able to reliably identify impartiality and commercial influence, suggesting they are probably not best placed to determine its prevalence, nature of severity.

Another notable aspect of this research was that no questioning around the adequacy of existing safeguards was undertaken, which means we are not in a position to judge public opinion of their adequacy.<sup>8</sup>

Resolve also noted that the research found that some consumers are already taking steps themselves to deal with perceived commercial influence, which implies the need for further safeguards is reduced.<sup>9</sup>

Perhaps most notable, however, is that the research can be interpreted as showing a low level of concern regarding commercial influence. In fact, the ACMA commissioned research found that commercial influence was 'rarely spontaneously mentioned as an issue', and even when presented with potential instances of commercial influence, consumers "were not able to reliably identify them and often did not care even when they perceived some level of commercial content. We must therefore conclude that this is a lesser priority for the public."<sup>10</sup>

## **5. Third-party research**

ASTRA is concerned that the third-party evidence and research cited by the ACMA in building a case for possible further regulation is ill-suited to that purpose. None of the third-party evidence and research cited by the ACMA pertains specifically to subscription television, or even to the regulated platforms deemed by the ACMA to be within 'scope' of its Discussion Paper. Many of the sources cited measure consumer sentiment towards all forms of media.

Consumers can be expected to have different views regarding the content they see and hear on different platforms and this limits the extent to which such generalised research can be used to support the contemplation of regulation on one or two subset platforms.

As an example of the extent to which consumer perceptions of platforms vary, we note research conducted by the ABC for its 2019 Annual Report, which shows greatly differing perceptions of the quality of television programming between the ABC and commercial television.<sup>11</sup>

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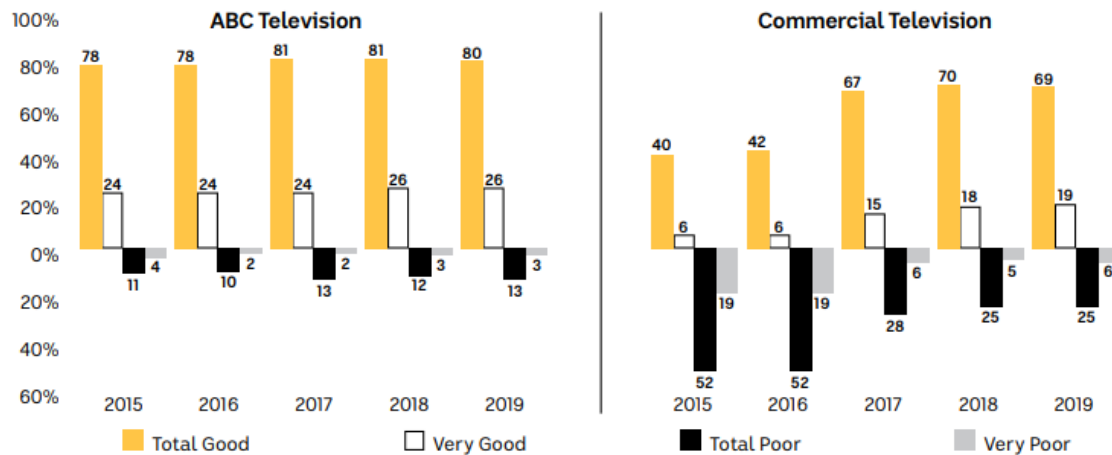
<sup>8</sup> Resolve, p 37

<sup>9</sup> Resolve, p 39

<sup>10</sup> Resolve, p 38

<sup>11</sup> <https://about.abc.net.au/wp-content/uploads/2019/10/ABC-Annual-Report-201819v2.pdf>

## ABC Television: quality of programming



2015-2016 Source: Based on those aged 14 years and over who ever watch television. Does not include 'Don't Know' or 'Poor' responses. Newspoll, ABC Appreciation Survey 2015; OmniPoll, ABC Appreciation Survey 2016.  
 2017-2019 Source: ABC Corporate Tracking Program, 2017 (n=2,546), 2018 (n=4,564), 2019 (n=4,583), online methodology, people aged 18-75 years.

Whilst this does not pertain directly to news and information, it does show that viewers have differing attitudes to different sources of media.

It is troubling therefore to see research sources referenced in the ACMA paper that take in all sources of media and are inappropriately used to bolster or support proposals concerning a more specific segment of the media. In particular, any research which considers news and information and which takes in online, digital platform and social media sources must be treated extremely carefully, given the stark differences in the standards and quality of those sources, compared to regulated, broadcast media.

Several jurisdictions internationally have expressed the highest level of concerns regarding the level of disinformation on digital platforms and social networks, with the UK House of Commons concluding that “democracy is at risk from the malicious and relentless targeting of citizens with disinformation.”<sup>12</sup> Any research that takes in these sources is going to provide a skewed illustration of standards and consumer attitudes.

For example, the ACMA has made several references to the ACCC’s Digital Platforms Inquiry, and the Roy Morgan research undertaken as part of that inquiry. The inquiry and its research are referenced in support of a general argument that Australians are losing confidence in news sources.

Given the clear focus of that inquiry on the digital platforms, its use by the ACMA in attempting to build a picture of some sort of deficiency with regulated platforms such as subscription TV and commercial free-to-air TV is concerning. It is erroneous to connect the very serious problem of news and disinformation purveyed by digital platforms and establishing a case of a regulatory deficit on subscription television.

Further in this section of the ACMA’s Executive Summary, there is reference to the ACCC Roy Morgan research, which states that 23 per cent of Australians have actively avoided news in the past week. Apart from the fact that this means that 77% of Australians did not, this research took in all sources of news and cannot credibly be cited as evidence of a problem on subscription television.

<sup>12</sup> <https://www.parliament.uk/business/committees/committees-a-z/commons-select/digital-culture-media-and-sport-committee/news/fake-news-report-published-17-19/>

Further, we note that the Roy Morgan research lists the main reason people are avoiding news is due to wanting to avoid the bad ‘mood altering’ effects of news (48%). That is, people don’t like bad news. This has nothing to do with regulatory failure. We note that bias and accuracy were also cited as reasons for avoiding news, but again note that the Roy Morgan research takes in all news sources. It is not possible to use this research to attribute these concerns to a particular platform (in the 23% of people who do avoid news).

Several references are also made to the 2017 Digital News Report and findings about media independence. It is not noted in the paper but the Digital News Report series looks at consumer experiences of all media. These reports are of little use in building an evidence base for regulatory failure on the subset of platforms which are regulated and purportedly the subject of the ACMA Discussion Paper.

### 5.1 Other aspects of the Executive Summary

There are a number of other troubling statements in the ACMA Executive Summary that are worth considering in detail, given that the ACMA’s underlying hypothesis of regulatory failure is primarily outlined in this section of the paper.

For example, reference is made to broadcast news as a format having undergone recent changes. This is indisputable, and is evidence of the challenges faced by media companies who are faced with an increase in competition from unregulated sources of news and information. It is also true that consumer preferences change over time, and it is evident that industry needs to be responsive and agile in adapting to these changes.

However, the inference appears to be that these changes have led to stress on regulatory standards and that they in some way justify a reconsideration of existing regulation. However, no evidence is presented which suggests that these changes have led to a degradation in quality or adherence to regulatory standards. As set out further in this submission, we do not believe there is any evidence of regulatory failure.

The ACMA Executive Summary also notes data that shows that television and radio remain highly popular sources of news in Australia. It is not clear, however the inference appears to be that this means that generalised concerns measured in relation to all news sources are able to be attributed to television and radio because they are popular platforms. We do not believe this is a valid conclusion to draw. Indeed, an alternative interpretation would be that television and radio remain popular because they are the most trusted platforms for people attempting to source news and information they can rely on.

The Executive Summary goes on to list other findings from the ACCC Roy Morgan research, including noting the importance of neutrality, unbiased reporting and independence are important for Australian adults. The issues reported as being of concern were stories being made up for political or commercial reasons, followed by misleading news commentary. ASTRA agrees that these are important standards, which is why we have robust regulation in place through the Codes of Practice.

The question that should be asked, is whether those Codes are being adhered to and are capable of meaningful enforcement should broadcasters fail to uphold them. The paper presents no persuasive evidence to suggest that subscription television broadcasters are not upholding the standards which are already in place. There is also



no evidence that the standards are insufficient to support the maintenance of the principles the public believes are important.

The clear fact is that ASTRA members adhere to these standards, as is shown by our exemplary compliance record (see below). This is in contrast to the digital platforms and social sources of news of information, which were within the scope of the Roy Morgan research.

Indeed, as noted by the ACMA themselves, the Roy Morgan research showed the 6 in 10 digital platform users have had a bad experience of news. It is not clear why the ACMA has included this in the context of its general hypothesis of a regulatory problem on regulated platforms, however it reinforces the fact that any research sources which take in all media cannot be used as evidence of a problem on a subset of platforms.

Further, in the Executive Summary, it is stated that “in a context of industry disruption, many Australians are losing confidence in news sources”. We contest the accuracy of this statement, – particularly that there is nothing in the research cited by the ACMA that enables a conclusion that Australians are losing confidence in news on subscription television.

## **6 Investigations and complaints data**

### **6.1 Relevance and probity of data**

While ASTRA accepts that it is not a sole consideration, it expressly rejects the proposal that the history of complaints, complaint management, investigations undertaken by the ACMA and published reports may not be a reliable indicator of community concern or awareness.

The ACMA argues that since complaints are made against Codes, complaints figures may not identify matters that aren’t addressed by the Code. However, the issues raised in the ACMA’s Discussion Paper (impartiality, distinguishability) are covered by the ASTRA Codes and hence consumer feedback on ASTRA members’ compliance with these provisions is directly relevant.

There is also an unsubstantiated claim that consumers may not pursue a complaint where the matter is an issue of general public interest. There is no evidence provided for this claim. It is not sufficient grounds on which to exclude from consideration the very low levels of consumer complaint regarding news and current affairs on subscription television.

ASTRA notes that subscription television has a direct customer relationship with its viewers and feedback is encouraged. In our experience it is very reliable indication of the views of our subscribers.

It would be unfortunate if the ACMA had sought to exclude consideration of the very low levels of complaint because the data did not support its overall proposition of regulatory failure.

Putting to one side the ACMA’s unsubstantiated dismissal of complaints and investigations data, closer examination of the information included in the report demonstrates there is minimal consumer concern regarding news and current affairs on

subscription television, and no evidence that the current Codes are failing to uphold community standards.

## 6.2 Investigations data

ASTRA is concerned regarding the manner in which investigations and complaints data is presented in the ACMA paper, as it has the potential to create a misleading impression of regulatory compliance and the nature of consumer concerns.

For example, the ACMA paper makes reference to 70 investigations into impartiality, commercial influence and related issues. However, our analysis indicates that the ACMA appears to have counted each head of investigation separately, even where they were contained in the one individual investigation report. Our analysis, based on data supplied by the ACMA upon request, suggests there were only 40 investigation reports published in the relevant period, a number which gives a substantially different impression of the level of regulator activity in that time period.

See Attachment B for a review of the ACMA investigations referenced in the Discussion Paper.

Of considerably greater concern, however, is the fact that these figures include investigations into complaints made against the ABC and SBS. This is not disclosed by the ACMA in its paper, despite the ACMA specifically excluding the ABC and SBS from the 'scope' of this project.

This is concerning for two reasons.

Firstly, the way the information is presented in the paper leads one to infer that there were 70 investigations against commercial free-to-air television and subscription television, given that these are the platforms deemed to be in 'scope' of the ACMA's paper. In actual fact, there were, as noted above, only 40 investigation reports, 26 of which (more than 50%) concerned the ABC and SBS. Hence the presentation of the information gives rise to a misleading impression of regulatory compliance by the two regulated platforms of commercial free-to-air television and subscription television.

Secondly, the fact that 65% of the investigations related to the national broadcasters suggests there is actually a substantial level of consumer concern regarding the national broadcasters that is not being considered by the ACMA in its project. Whilst it is acknowledged that the ABC and SBS write and approve their own Codes of Practice, and that the ACMA does not have a role in this process, perhaps the adequacy of this arrangement should be an issue that is considered by the ACMA in its project, given the prevalence of investigations activity.

A consideration of regulatory standards around impartiality in Australian media that doesn't take in the ABC and SBS would appear to be fatally incomplete. We also note that whilst the ABC and SBS Codes are not approved by the ACMA, they are, evidently, empowered to investigate compliance with them and hence should be in an ideal position to consider the adequacy of those regulatory standards.

In any event, of the 70 heads of investigation, or 40 investigation reports, only one related to subscription television (Russia Today – BI-418) in which the breach finding related to complaints handling requirements, with no finding on the impartiality aspect of the investigation.

Hence it is clear that subscription television news and current affairs providers are complying with the rigorous standards which already exist in the ASTRA Codes of Practice. There is no evidence of significant numbers of complaint or of the ACMA being faced with complaints and broadcaster behaviour that they have struggled to investigate or find appropriate regulatory standards to apply.

### 6.3 Complaints/contacts

ASTRA is also concerned regarding the presentation of data regarding consumer complaints/contacts received by the ACMA during the relevant time period.

The ACMA makes reference to 313 contacts it received since 2015 regarding impartiality-related matters. However, upon request the ACMA was unable to provide a breakdown of these contacts by broadcaster, so it is not clear if and how many of these contacts related to the ABC and SBS, who are deemed by the ACMA to be out of scope of the paper. One would not ordinarily presume that out of scope data would be deliberately included in a paper of this kind, however as noted above, investigations relating to the ABC and SBS were included by the ACMA in the data presented on impartiality and commercial influence investigations. Hence it would seem reasonable to assume that the 313 contacts could include contacts regarding the public broadcasters.

Before this data can be used to support a case that the regulatory standards on particular platforms are failing, it must be made clear whether the data in fact covers other platforms.

### 6.4 Complaints regarding subscription television news and current affairs

Data collected by industry demonstrates there is a very low level of concern amongst viewers of subscription television news and current affairs programs regarding impartiality and commercial disclosure.

In the period since 2015 to end-2019, Foxtel has received 28 Code of Practice complaints relating to impartiality and disclosure which were resolved without the involvement of the regulator. In that time, Foxtel has broadcast over 500,000 hours of news and current affairs programming. That equates to approximately one complaint for every 20,000 hours of content, which demonstrates an exceedingly low level of concern.

As this feedback relates directly to news and current affairs on subscription television, it is a far more reliable and robust indicator of the level of public concern regarding the platform than are the various research reports referenced by the ACMA which take in all sources of media.

## **7 Conclusion**

ASTRA takes very seriously its obligations to ensure community standards are upheld and that regulatory requirements are adhered to. This compliance culture is evidenced by the very small number of complaints and minimal regulatory infraction.

ASTRA acknowledges the importance of ensuring that, regulatory standards remain set at appropriate levels, and the importance of assessing community standards and expectations regarding media content.

The evidence put forward by the ACMA contains several critical flaws and cannot be used as a basis for further regulatory intervention. It is also contradicted by complaints and investigations data.

Therefore we do not support the contemplation of further regulatory intervention when it is based on such insufficient and/or misleading evidence.

At this time we can see no case has been made out for any changes to the existing regulatory framework.

## **ATTACHMENT A**

[Resolve Strategic report provided as separate file]

## ATTACHMENT B

The Discussion Paper references 70 published ACMA investigations into impartiality, commercial influence and related issues. Upon request ACMA provided copies of 40 of these investigation reports to broadcasters (which excluded one withheld investigation report on privacy grounds). An analysis of those 40 investigations is provided below. Of the 40, 25 were broadcast on the ABC, 1 on SBS, 12 on Free TV and 1 on West TV open narrowcast. Of the 40, there were only 4 breach findings, 3 in relation to the ABC and 1 in relation to commercial free-to-air television broadcasters (Nine).

Out-of-scope (ABC)		Out-of-scope (SBS)		Commercial FTA (No Breach)		Commercial FTA (Breach)		Subscription television (breach)	
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ACMA INVESTIGATIONS – IMPARTIALITY AND COMMERCIAL INFLUENCE RELATED ISSUES										
	Investigation No	Year	Impartiality	Fairness	Balance	Right of Reply	Diversity	Distinguishability / CI	Broadcaster	Breach?
1	3347	2015	X		X				ABC	No
2	BI-31	2015	X	X					Seven	No
3	BI-46	2015	X				X		ABC	No
4	BI-49	2015				X			ABC	No
5	BI-50	2015				X	X		ABC	No
6	BI-55	2015		X					Nine	No
7	BI-123	2015		X					ABC	No
8	BI-159	2016	X		X				ABC	No
9	BI-162	2016	X						4CA	No

10	BI-163	2016	X						ABC	No
11	BI-170	2016	X		X		X		ABC	No
12	BI-172	2016	X	X					Nine	No
13	BI-198	2016	X		X				ABC	No
14	BI-221	2016	X	X					ABC	No
15	BI-222	2016	X		X				ABC	No
16	BI-227	2017	X	X				X	Nine	Yes
17	BI-228	2016	X		X				ABC	No
18	BI-240	2016	X	X					Seven	No
19	BI-257	2016	X		X				ABC	No
20	BI-270	2017	X						ABC	No
21	BI-273	2017	X	X					TEN	No
22	BI-305	2017	X	X		X			ABC	Yes
23	BI-309	2017		X					Nine	No
24	BI-311	2017	X						ABC	No
25	BI-319	2017	X	X	X	X			ABC	No
26	BI-329	2017				X			ABC	No

27	BI-330	2017	X	X		X			ABC	No
28	BI-428	2018	X		X				ABC	No
29	BI-418	2018	X						Russia Today	No (impartiality)
30	BI-407	2018	X						ABC	No
31	BI-411	2018	X						ABC	No
32	BI-405	2018		X					Seven	No
33	BI-403	2018	X	X					Seven	No
34	BI-396	2018	X						ABC	No
35	BI-360	2018	X		X		X		SBS	No
36	BI-347	2018	X	X					ABC	Yes
37	BI-356	2018						X	Seven	No
38	BI-346	2018	X						WIN-Ten	No
39	BI-456	2019	X						Seven	No
40	BI-442	2019	X						ABC	Yes
	<b>TOTAL</b>		<b>32</b>	<b>15</b>	<b>10</b>	<b>6</b>	<b>4</b>	<b>2</b>		