

Analysis of the Competition Landscape of Philippine Mass Media

Ramonette B. Serafica and Queen Cel A. Oren

Philippine Institute of Development Studies

Conversations on Media, Communication and Development

13 November 2025

Discussant: Carlos Vega

Synopsis

1. The paper looks at the media sector in the Philippines, assessing competition using CR4, HHI and MOCDI – which is supposed to capture diversity of voice alongside concentration proposed by Noam and the International Media Concentration Collaboration (2016)
2. With the backdrop of digitalization of mass media, it gives a rundown of the relevant regulatory instruments that govern media markets and provides a summary of data on trends.
3. The paper finds that radio broadcasting is generally less concentrated and with more diverse voice while TV broadcasting and newspaper publishing are highly concentrated.
4. Challenges include (i) regulatory barriers, eg legislative franchise requirement, (ii) declining ad revenues for traditional media, (iii) high costs associated with transition into digital media, (iv) influence of social media, big tech and AI on content distribution, (v) poor connectivity and digital literacy

Comments

1. The combination of consumption moving towards online platforms and poor internet connectivity (outside NCR) underscores the importance of understanding competition
2. Consider defining market boundaries (along product and geographic dimensions) according to the extent services are substitutes – demand side discussion on customer switching behavior.
3. Characterization of competition in PH media markets – non-price competition particularly along the lines of content development and innovation – possibly situating this alongside other countries (possibly those with extensive digital shift and/or better connectivity)
4. $HHI = \sum s_i^2$ vs $MOCDI = \frac{\sum s_i^2}{\sqrt{n}}$ conceptually may be problematic if applied to anti-trust analysis. A relevant market (where HHI is used to measure concentration) presumes "similarity" of goods/services to the extent that they are substitutable, while MOCDI attempts to capture the degree of "difference" within the same market. Way around this could be looking at the deltas.

Simulations, HHI vs MOCDI

Consolidation in a market: the disappearing fringe voice

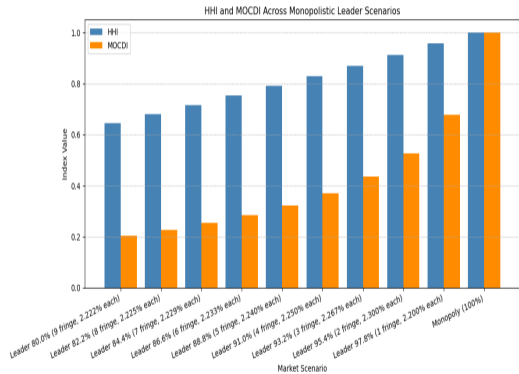


Figure 1: HHI, MOCDI Levels

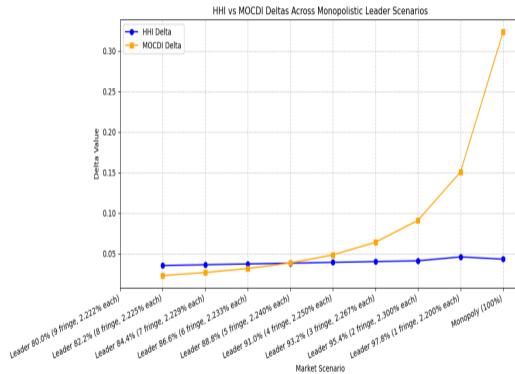


Figure 2: HHI, MOCDI Deltas

Questions

1. Does the computed MOCDI for the Philippines consider UPE ownership?
2. When a daily/station is reported as operating in a geographic area, say NCR, does this mean it has its official headquarters there? How are operations that extend to other areas reflected in the findings?
3. In the 4 layer model, how does it incorporate the multi-sided nature of platforms – advertisers, consumers, content creators (for some)
4. Would standard theories of harm need to be revisited with the incorporation of diversity of voice ? Does the observation that media owners have cross sector interests and are often motivated by amenity potential mean that theories of foreclosure are more likely? Can this lead to non-standard theories like “political foreclosure”?

Thank you for the opportunity to discuss this paper!