

Dr David Wolfe QC  
Chairman  
Press Recognition Panel  
Mappin House  
4 Winsley Street  
London W1W 8HF

18 August 2016

Dear Dr Wolfe,

1. Thank you for your letter of 16 August 2016 responding to the NMA's letter of 15 August. You say that you will consider the points in our letter. We are not clear whether you are intending to respond to them prior to the meeting on 23 August – your letter does not itself provide a full or satisfactory response. We would be grateful if you could clarify this.
2. We stand by the points made in our letter. Your response does not address them. Just by way of example:
  - 2.1 The lack of consultation on the Interpretation contrasts with the consultation you undertook on a range of matters including the guidance for applicants (**Guidance**) in 2015.
  - 2.2 The Interpretation is obviously directed at IMPRESS's application, which you acknowledge was being scrutinised at the time of publication of the Interpretation, yet it was not published until after the two public calls for information on the application had been closed. Another public call for information would have given us, and others, the opportunity to make submissions in the light of the Interpretation.
  - 2.3 The Royal Charter contains definitions in Schedule 4. Where a term is not defined words should be given their ordinary natural meaning. There is no ambiguity in the particular Recognition Criteria: the Board has no authority to extend or change the literal meaning of the words within those Criteria. Yet that is just what the Board has done in the Interpretation which, if followed, would have the effect of significantly changing some of the Royal Charter Recognition Criteria.

3. We note that when the Interpretation was originally published it was identified as Section 5 of the Guidance and as the Board's "interpretation of some terms and elements in the Royal Charter" (as it was when we wrote to you on Monday). We see that now it is no longer portrayed as part of the Guidance and is described as the Board's "initial indicative view" on those elements. Can you please explain the reason for this change?
4. The PRP has an opportunity now to correct its mistaken 'initial indicative interpretation' of elements of the Recognition Criteria which go to the heart of the deficiencies in the IMPRESS application.
5. Our concerns about the serious flaws, both in the substance of IMPRESS's application and the process adopted by the PRP thus far in considering it, are not allayed. We repeat our request that the PRP properly discharges its public functions and refuses recognition of IMPRESS.

Yours sincerely,



Lynne Anderson  
Deputy Chief Executive  
News Media Association

