

Regulation,  
Regulators, and  
the Crisis of Law  
and Government

# Press Regulation: Taking account of media convergence

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Policy Brief

FLJS

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The Foundation for Law, Justice and Society

in association with **the Centre for Socio-Legal Studies**  
and **Wolfson College, University of Oxford**

**Regulation, Regulators, and the Crisis of Law and Government**

This programme examines the regulatory system in the wake of the global financial crisis, assessing its current weaknesses, the role of legislative and judicial bodies, and identifying measures for future reform of both markets and regulatory regimes. It aims to shed light on the recent failures of regulators, often captive of the very industries they are meant to regulate, and examine ways to improve the accountability and effectiveness of the regulatory system.

The author would like to record that this policy brief draws on two reports prepared for the Reuters Institute for the Study of Journalism: *Regulating for Trust in Journalism: Standards regulation in the age of blended media* and *Regulating the Press: A comparative study of international press councils*.

# Executive Summary

- Press regulation, and debate over its future, cannot be isolated from a wider settlement for media content if regulatory coherence across platforms is to be achieved. Consumers, particularly younger consumers, are engaging with a range of broadcast, print, self-scheduled, and wider online content. Yet the standards (if any) applied to these services increasingly lack consistency and fail to enable citizens to make informed, democratic choices across media platforms.
- Outstripped by technology, media regulation remains essentially static and divided, while media content and delivery are characterized by mutation and convergence. Traditional regulatory leverage is also shifting. For broadcasting, leverage provided by the allocation of analogue spectrum is receding and digital spectrum leverage is limited. For print, time has been called on the self-regulatory framework.
- An analysis of international approaches to press, and wider media, regulation reveals a range of responses to common problems. At the statutory end of the regulatory spectrum (as in Denmark) mandatory rules apply across broadcasting and print. At the purely voluntary end press councils are haemorrhaging members (as in Canada).
- A middle way is to identify the privileges accorded to journalists and then recognize adherence to regulation as an ethical, accountable demonstration that a publication merits those privileges (illustrated in Ireland in relation to defamation defences). Occupation of the regulated space is thereby incentivized and providers can differentiate their content from unregulated material to commercial advantage. Over time, this model of incentivized ethical press regulation could be extended to all non-public service media, including broadcasting.
- Managed transition towards a new settlement for media regulation in the digital age is proposed. This would recognize that the current regulatory framework, attaching regulation to the method of delivery, has run its course. Instead simple, tiered standards marks would denote three categories of provision across media platforms based on the distinction between 'public' and 'private' services. Each would be open to emerging providers on an 'opt-in' basis, and readily distinguishable from unregulated content (subject to the law):
  - TIER 1: comprehensive, statutory requirements for 'public service' providers;
  - TIER 2: voluntary, ethical standards for 'private' content across media platforms, robustly incentivized through statutory recognition;
  - TIER 3: minimum statutory requirements in relation to child protection and hate speech.
- The proposed new regulatory settlement incentivizes transparently signalled standards as a selling point for existing and emerging media providers, and places informed, enabled citizens at its heart.

# Press Regulation: Taking account of media convergence

## Debating press regulation in its wider context

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As Lord Justice Leveson's Inquiry into press standards dominates our headlines and imaginations with a focus on print journalism, it is worth reminding ourselves of the extraordinary breadth of recent attention devoted to the wider future of media regulation. The past year has seen Culture Secretary Jeremy Hunt kick-start the debate on the next Communications Act; a Joint Committee drawn from both Houses of Parliament consider 'the correct balance between privacy and freedom of expression', following the furore over 'super injunctions'; the Lord Chief Justice conduct a consultation on the use of twitter, email, and text messages for court reporting, and the wider question of who should be identified as 'the media' for these purposes; an Independent Review investigate the commercialization and sexualization of childhood in the media; and the House of Lords Select Committee on Communications' *Inquiry into the Governance and Regulation of the BBC*, baffled by the complexity of BBC complaints processes, express concern about the overlapping jurisdictions of the BBC Trust and Ofcom.

The golden thread of journalistic standards runs through each of these separate investigations, consultations, and inquiries, but pull the thread and the whole fabric of media regulation is in danger of unravelling. For while high-profile concerns about specific facets of regulation have surfaced with increasing regularity, and most prominently in relation to phone hacking, underlying regulatory tensions have been developing that threaten long-term public confidence in journalism across the media landscape. Consumers, particularly younger consumers, are accessing and engaging with a range of broadcast, print, self-scheduled, and wider online content. Yet the standards (if any) applied to these services are opaque and confusing and fail to enable citizens to make informed, democratic choices across media platforms.

Press regulation, and debate over its future, cannot be isolated from wider reform of media regulation if regulatory coherence is to be achieved. This poses a considerable challenge, but with it comes a significant opportunity for reformed press regulation to provide the foundations for a new regulatory settlement flexible enough to support existing and emerging media consumers and providers across platforms.

## Converging media content vs static standards regulation and the democratic deficit

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As technologies advance apace, media content and delivery are characterized by mutation and convergence, while the standards regulating them are essentially static and divided. Newspapers are not just printed but online and carry video packages with the look and feel of traditional TV; broadcasters publish websites including text-based articles similar to online print offerings; scheduled programmes are broadcast but also available on-demand, both on digital channels and a variety of websites; user-generated material vies for online audiences alongside professionally produced content; professional and amateur bloggers share the same debates.

Accessed via a PC, smart phone, and tablet devices, regulated and unregulated content, licensed and unlicensed services, are becoming impossible to differentiate. With the advent of internet-connected televisions they sit side by side on the living room TV, fuelling the potential for consumer confusion over whether the content with which they engage is regulated and, if so, to what extent and by whom.

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Some material is subject to comprehensive rules set down by Parliament, some to lighter touch ‘co-regulation’, some to voluntary self-regulated rules, some to no regulatory authority at all. Impartiality, for example, has been at the core of broadcasting requirements, partiality at the heart of newspaper freedom. As the two media converge this distinction begins to appear arbitrary and opaque. Meanwhile, consumers’ assumptions that ‘video on demand’ content is regulated to the same standards as broadcast content are not met by the limited regulation that actually applies.<sup>1</sup> Moreover, younger, converged, consumers do not have the same reference points, such as brand associations, that to some extent assist older consumers in forming expectations around different content, and so differing regulation appears increasingly illogical and ineffectual. At the same time, services providing for diverse communities are challenging notions of generally accepted standards.

The most comprehensive regulation applies to broadcasting, and takes as its starting point the ‘adequate protection’ of the public. Protection of children is of considerable and continuing public concern, but does ‘protection’ continue to be a meaningful ambition in relation to adult consumers, when sources of content are unlimited and widely unregulated (given the context of the online content world)? Is protection a desirable goal when, arguably, singling out broadcast content for comprehensive regulation gives a false sense of regulatory security, and leaves the consumer exposed and unprepared for the limited if not non-existent regulation of other content?

In addition, regulatory leverage is shifting. Democratic imperatives, but also pragmatic approaches, have always underpinned regulation; that is, regulation is imposed where there is leverage over a provider. For broadcasting, the leverage traditionally provided by the allocation of analogue spectrum is receding and digital spectrum leverage is limited. Regulatory leverage was also shifting for print media before the current inquiry into its future. The Press Complaints Commission’s (PCC’s) credibility was undermined not just by the phone-hacking scandal, but by newspaper titles operating with impunity outside its authority, and by the widening gap between the interests and ambitions

of the broadsheet and red-top ends of the market. Consideration of the purpose and practice of regulation across media platforms is required. Occupation of the regulated space may need to be incentivized in the future, to ensure compliance and to prevent migration to unregulated platforms provided online.

Overall, current regulation, and the piecemeal attentions of recent inquiries and consultations, fail to address the democratic value in enabling the citizen to navigate and evaluate a range of journalism and other content — be it partial or impartial; regulated or unregulated; with public service commitments or purely commercial ambitions; and whether derived from broadcasting, print, video on demand, or online. Without a coherent regulatory approach citizens cannot base their expectations of content on any consistent framework; they cannot sensibly evaluate its credibility nor make informed judgements about engagement with it; nor can they differentiate regulated and unregulated content in any meaningful way.

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### **Lessons from overseas: mandatory vs voluntary press regulation and an incentivized middle way**

At the heart of current debate on UK press regulation is the core question of mandatory versus voluntary regulation. Broadcasting is subject to a statutory framework of regulation based on concerns over information scarcity, the potential for the medium to exert a harmful influence, with television and radio traditionally cast as ‘guests in the living room’ pushing content out to audiences. Print journalism, however, does not attract the same protections and this has been justified through a different narrative. Buying a newspaper is seen as a more active expression of choice and one which does not expose the purchaser to the same degree of influence as the broadcast media. Furthermore, calls for statutory regulation bring with them the spectre of licensing the press.

An analysis of international approaches to press, and wider media, regulation provides a useful context for this debate. It reveals not a binary choice but a spectrum of approaches ranging from wholly

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voluntary 'self-regulation' by industry; through 'independent regulation', where representatives of the public provide a significant presence on press councils; through incentivized regulation, where voluntary press council membership is recognized in statute; through to 'co-regulation', which includes elements of statutory compulsion; with many shades of regulation between and beyond.

Voluntary regulation carries with it the threat of publishers pulling publications out of the regulatory body, as notoriously illustrated by Richard Desmond's decision to withdraw his titles from the PCC. Canada is instructive in this regard. In July 2011 its largest newspaper publisher Sun Media Corporation pulled all its publications (twenty-seven out of the thirty-seven daily newspapers in Ontario) out of the Ontario Press Council. In so doing it accused the press council of a 'politically correct mentality ... incompatible' with the editorial direction of its urban tabloids. In Quebec 40 per cent of news publications sit outside the regulatory framework. And in January 2012 the Manitoba Press Council shut down after the last participating newspapers withdrew. Canada offers a stark lesson in what happens when newspapers feel they have no stake in a voluntary system and suffer no consequences from withdrawal.

At the other end of the regulatory spectrum, Denmark provides the example of a co-regulatory combination of mandatory requirements and self-regulatory elements, backed by the sanction of a fine or imprisonment if a publisher or broadcaster fails to publish a decision. However, even in such a context, compliance remains an issue. In February 2012 the Danish Parliamentary Committee on Legal Affairs and Culture issued a statement citing recent egregious errors in the Danish press and failures in relation to prominent publication of Press Council adjudications. The Committee has embarked on a scrutiny of the Press Council, its powers, and its future and will report later this year.

Perhaps the most significant area is the middle ground between voluntary and mandatory regulation. Here Ireland offers a useful example of a regulatory framework in which incentivized, active compliance is voluntary, recognized in statute, and independent both of industry and the state.

Essentially, an incentivized approach to press regulation identifies the privileges and rights accorded to journalists and then recognizes adherence to regulation as an ethical, accountable demonstration that a publication merits those privileges. In Ireland this recognition applies in defamation proceedings where a court can take into account press council membership, and adherence to the Press Council's code and determinations, when considering whether publication of a statement subject to defamation proceedings is fair and reasonable. Interestingly the *Irish Daily Star*, co-owned by Richard Desmond, is, like the majority of the Irish press, a Press Council member.

In New Zealand the Law Commission is considering whether adherence to ethical standards and accountability might be linked more widely to a range of protections and exemptions for journalists such as exemptions from data protection restrictions, rights of attendance in certain court and parliamentary sessions, and protection of sources.

### **A proposed new regulatory settlement: a three-tier structure across media platforms**

In the UK, the current focus of attention on press regulation through the Leveson Inquiry provides the opportunity to establish a model of incentivized ethical press regulation under which membership of, and demonstrable active compliance with, regulation has a legal, commercial, and ethical value. Combined with a clear standards mark demonstrating press council membership, it would allow providers to differentiate their content from unregulated material, and consumers to make informed choices about the journalism with which they engage.

Meanwhile, the next Communications Act faces the difficulty and opportunity of distilling what we value about the public space and regulating it, coherently and proportionately, across platforms. This entails carving out, at the heart of debate on the future communications framework, a democratic agenda. It requires a recognition that the current regulatory framework, attaching regulation to the method of delivery (broadcast, newspapers, video on demand), has run its course.

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The proposal here is for gradual transition towards a framework that instead differentiates between 'public' and 'private' providers. Simple, tiered standards marks would denote three categories of provision across media platforms, each open to emerging providers on an 'opt-in' basis, and readily distinguishable from unregulated content (which would be subject to the law):

***TIER 1: comprehensive, statutory requirements for 'public service' providers across media platforms***

Under the proposed Tier 1 regulation, the current comprehensive statutory requirements for all *broadcasting* would, over time, be redistributed and instead apply to *public service content* across media platforms, i.e., to content in which there is a public interest, through, for example, public ownership, funding, and/or subject to public service obligations. The proposed regulatory settlement would provide a clear, statutory understanding of the value of, and expectations around, 'public' content providers with public service duties and privileges. It would set out 'premium standard' statutory requirements for media providing public service content (the BBC, Channel 4, S4C, and currently ITV<sup>2</sup> and Channel 5) across all media platforms, including related websites and video on demand provision. These 'public' providers would be expected to play a role in supporting consumers in navigating online content and to counter concerns that fragmented new media serve to reinforce prejudices and narrow horizons.

Comprehensive rules, potentially not dissimilar to the current Ofcom Code but based on a principle of enabling citizens and protecting children, would apply. Impartiality requirements would provide access to balanced coverage and a range of viewpoints on issues of particular public significance and debate.

Under the approach proposed, commercial public service providers would be incentivized to continue to maintain their commitment to public service provision through such benefits as electronic programme guide prominence and enhanced access to audiences via the public service multiplexes. Standards requirements would be part of the expectations placed on them, but also a transparent demonstration of excellence and authority,

associating them with media organizations under public ownership, and differentiating their offerings from the rest of the industry.

The rules would be set out in statute and administered and enforced by a regulator with statutory powers. Initially this top tier of regulation could apply across broadcasting. However, a new Communications Act would open up the possibility of other providers, perhaps whose selling point is their impartiality, affiliating themselves with this tier. Over time this could include video on demand services, newspapers, and any other online providers. Similarly, over time, private broadcasters (without public service obligations) could elect to move to either of the two following tiers of regulation.

***TIER 2: voluntary, robustly incentivized ethical standards for 'private' (non-public service) content across media platforms***

It is proposed that a new model of 'independent' voluntary regulation should be introduced and recognized in statute, initially for the press and, as it develops, open to non-public service media across print, broadcasting, video on demand, and wider online provision. This would be a regulatory model in which the press would retain the freedoms and privileges on which its journalism is founded but would also have a voluntary yet clear mechanism for acknowledging the duties and responsibilities that accompany them. It would be incentivized to adhere to robustly enforced standards, as a demonstration of those commitments in print and online, and consumers would be provided with clarity over whether individual titles choose to operate within the regulated or unregulated public space.

Under this approach the following key principles would govern press regulation, in addition to the wider transparency requirement discussed below:

***Independence.*** This second tier of regulation would be independent of both state and industry, recognized by both but beholden to neither. It would be funded, and its rules established, by industry, but the independence of its decision-making and robustness of its sanctions would be assured.

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**Statutory recognition.** The proposed model of regulation would be provided with recognition in statute. This would lay a secure foundation for its authority and independence, including the composition and independence of its board and adjudicating panels, and a recognition of a range of procedures and sanctions. It would not confer statutory powers, since the basis for its authority would be voluntary membership, but would provide a link to a number of significant privileges associated with membership (discussed below).

**Incentivized voluntary participation.** Newspapers, in print and online, as well as independent journalists and bloggers, would have the choice of electing standards as a selling point through this model of regulation and enjoying associated benefits. Conversely, they could choose to operate outside the regulated sphere and simply within the law, as is the case for unregulated online content. Benefits and privileges could include accreditation in relation to court reporting and other privileged access to information, attractive advertising associations, and recognition of affiliation by the courts in any privacy or defamation proceedings. Those newspapers operating outside the regulated sphere would be understood by the public to have rejected such an association and would be unable to demonstrate their ethical standards through this framework and associated standards mark.

**Credible investigations and sanctions.** In return for the benefits of membership, the regulated press would be required to agree and accept a range of sanctions and investigatory procedures at the disposal of the new regulatory body, including suspension and expulsion from its membership and associated benefits.

**Transition.** Over time the proposal would be to extend the model of Tier 2 independent regulation to 'private' media across all platforms, on a voluntary basis. In this way, private media would be incentivized to elect to adhere to voluntary ethical standards drawn up by industry. The standards could be nuanced for the provision of content across broadcast, print, video on demand, and online platforms and apply to any provider seeking to differentiate their offering by adherence to them.

### **TIER 3: Consistency with the European baseline regulation for broadcast and video on demand services**

For providers deciding not to make the commitment to standards set out in Tier 2, statutory requirements would be set out as a baseline of regulation for all 'private' broadcast and video on demand providers consistent with the demands of European agreed standards. Requirements could include protection of the under-eighteens, a prohibition on incitement to hatred, and commercial obligations. These requirements would be compulsory only for broadcast and video on demand services (including any provided by newspapers). However, over time it could be open to newspapers (in print and online) to move down from Tier 2 to Tier 3 (sacrificing associated benefits and privileges); meanwhile currently unregulated online providers could elect to opt in to this level of regulation as a mark of basic standards.

#### **Transparency**

Each regulatory tier would be required to be signalled by a transparent 'standards mark' displayed on electronic programme guides (EPGs), in print, and clearly flagged on websites or other electronic media. The standards mark would provide not just mainstream providers but, significantly, new brands with transparent messaging for the public. It would readily identify providers subscribing to each tier, and also attach to individual content provided via online content aggregators.

#### **An inclusive framework for new media providers**

The ambition of the proposed settlement would be both to manage transition by establishing a framework that first introduces coherent regulation for those providers currently subject to statutory or self-regulation, but secondly provides sufficient flexibility so that the framework can be developed and offered to emerging providers (on a voluntary basis), over time.

It would be open to any media provider not caught by the compulsory regulation of Tiers 1 and 3 to 'opt in' to any of the three tiers of regulation. A blogger could, for example, seek accreditation through voluntary affiliation with a chosen tier. Similarly, a commercial provider subject only to minimal

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requirements could elect to join a tier offering enhanced regulation if that were considered advantageous to their offering. Going forward, newspapers, as their online content becomes an increasingly significant part of their offering, could seek association with any of the three tiers. Broadsheets and tabloids could, for example, elect regulation under different tiers depending on which most closely reflected their values and content. The proposed framework is not limited to audiovisual material, but would be offered to any electronic media provider as the media landscape develops.

### Standards as a selling point

The three tiers of standards regulation, each denoted by an associated standards mark, would target requirements and thereby enable citizens and consumers to access a varied, but coherent, public space across broadcast, print, video on demand, and related online services. This approach takes as its starting point the objective of *enabling*, rather than *protecting*, the public; in addition, it incentivizes providers to see regulation as a selling point — a way of differentiating their offering in an increasingly competitive, global market — rather than as a burdensome constraint.

Consumers would be enabled to access, navigate, and engage with journalism, and wider media content, as active, informed citizens who make choices about media content. A transparent regulatory framework would support them in

differentiating regulated from unregulated journalism and other content; in basing their expectations of a range of regulated content on clear, straightforward signposting across platforms; and in making choices accordingly. In addition, appropriate protections would be provided for the vulnerable, including, most importantly, children.

This would represent a new compact including citizens, journalists and other media providers, regulators, and Parliament in its development. It would recognize that, in order to provide a proportionate and consistent approach to regulation across the media, some current regulatory expectations would be reduced (with a deregulatory approach to non-public service broadcast content) and others developed (incentivizing consistent independent regulation of journalism and other content across online and video on demand, newspaper, and commercial broadcast services). This realigning of provider duties and consumer expectations will undoubtedly present challenges, however its ambition is to provide coherence and clarity. It proposes a gradual redistribution and evening of requirements across a media landscape whose regulation is increasingly characterized, as demonstrated here, by inconsistency and confusion. The ambition is to move towards a new cross-media, tiered regulatory framework that provides for the range of content across the public space, incentivizes transparently signalled standards as a selling point for both existing and emerging media providers, and places informed, enabled citizens at its heart.

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### Notes

1. <http://stakeholders.ofcom.org.uk/binaries/research/tv-research/vod.pdf>

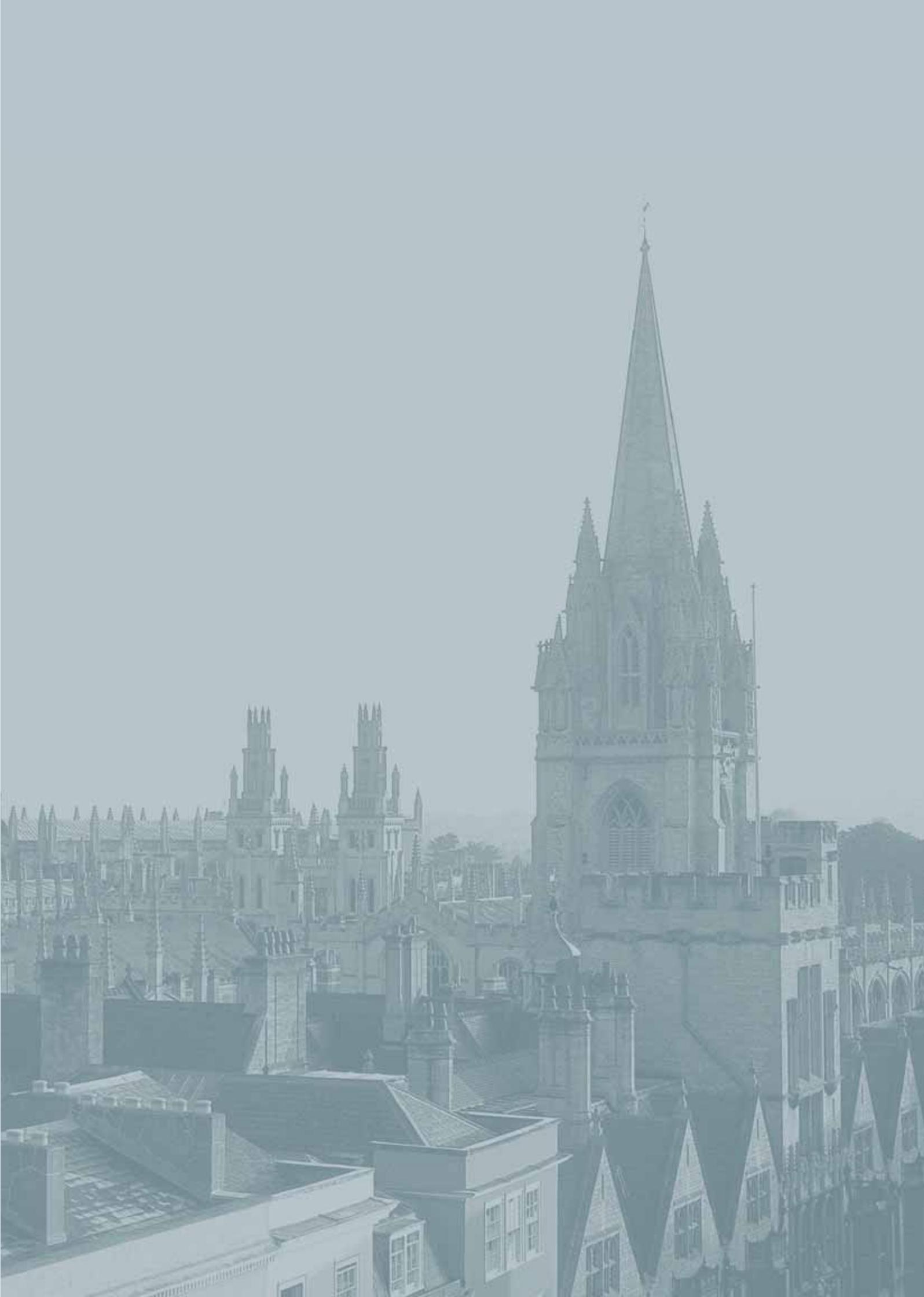
2. Including STV, UTV, and Channel Television.

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## Further reading

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- Bailey, R., *Letting Children be Children* (TSO, 2011)
- Bridcut, J., *From Seesaw to Wagon Wheel: Safeguarding Impartiality in the 21st Century* (BBC Trust, 2007)
- Calcutt, D., *Review of Press Self-Regulation*, (HMSO, 1993)
- Culture, Media and Sport Committee, *Press Standards, Privacy and Libel* (TSO, 2010)
- Currah, A., *What's Happening to Our News* (RISJ, 2008)
- Currie, D., 'The Principles and Objectives of a Converged Communications Regulator' (4th ECTA Regulatory Conference, 2003)
- Czepek, A., Hellwig, M. and Nowak, E. (eds), *Press Freedom and Pluralism in Europe* (Intellect, 2009)
- Eberwein, T., Fengler, S., Lauk, E. and Leppik-Bork, T. (eds), *Mapping Media Accountability – in Europe and Beyond* (Herbert Von Halem Verlag, 2011)
- Essential Research, *The Regulation of Video-On-Demand* (Ofcom, 2009)
- Fielden, L., *Regulating for Trust in Journalism: Standards regulation in the age of blended media* (RISJ in association with City University, Oxford 2011)
- Fielden, L., *Regulating the Press: A comparative study of international press councils* (RISJ, Oxford, April 2012)
- Foster, R., and T. Broughton, *Creative UK: The Audiovisual Sector and Economic Success* (Communications Chambers, 2011)
- Gardam, T. and D. A. L. Levy (eds), *The Price of Plurality, Choice, Diversity and Broadcasting Institutions in the Digital Age* (RISJ, 2008)
- Hargreaves, I. and J. Thomas, *New News, Old News* (ITC/BSC, 2002)
- Information Commissioner's Office, *What Price Privacy? The Unlawful Trade in Confidential Personal Information* (ICO, 2006)
- Koene, D., *Press Councils in Western Europe* (Netherlands Press Council Foundation, 2009)
- Mediadem, *Media policies and regulatory practices in a selected set of European countries, the EU and the Council of Europe* (Mediadem, 2010)
- Murdoch, J., *The Absence of Trust* (MGEITF, 2009)
- Ofcom and GfK, *The Consumer's Digital Day* (Ofcom, 2010)
- Puppis, M., *Organisationen der Medienselbstregulierung. Europäische Presseräte im Vergleich (Organizations of media self-regulation. European Press Councils in Comparison)* (Halem, 2009)
- Purvis, S., *Calling Time on Analogue Regulation: An Agenda for the Next Communications Act* (RTS, 2010)
- Thompson, M., *Leveson Inquiry - Briefing on International Approaches to Press Regulation* (Open Society Media Program, 2011)
- Salomon, E., *Guidelines for Broadcasting Regulation* (CBA/UNESCO, 2008)
- Schmidt, E., *Television and the Internet: Shared Opportunity* (MGEITF, 2011)
- Select Committee on Communications, *Inquiry into the Governance and Regulation of the BBC* (TSO, 2011)



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**Lara Fielden** is a Visiting Fellow at the Reuters Institute for the Study of Journalism (RISJ). Her book *Regulating for Trust in Journalism: Standards regulation in the age of blended media* argues that the current regulatory framework for UK media — separating broadcast, newspaper, and online content — has run its course and sets out proposals for a new regulatory settlement across the media. Her report *Regulating the Press: A comparative study of international press councils* was commissioned by the RISJ as the first comparative study of press regulation to contribute to debate on UK press reform and published in April 2012. Lara's publications are informed by her experience in both journalism and regulation. Between 2005 and 2010 she was with Ofcom where she managed fairness and privacy adjudications and reviews of Ofcom's Broadcasting Code. Prior to Ofcom, Lara spent ten years as a news and current affairs producer with the BBC.

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The logo for the Foundation for Law, Justice and Society (FLJS) features the letters 'FLJS' in a large, light-colored, sans-serif font. A small '+' sign is positioned between the 'J' and 'S'.

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