Advertising Agency Engagement and Regulatory Empowerment in the World of New Media

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Abstract

This paper examines how new media has impacted advertiser behaviours in relation to controversial advertising. This research seeks to explore the extent of advertiser engagement and regulatory empowerment in a new media environment, where an advertiser can show offensive advertising online via new media despite a ban by the self regulatory body in relation to traditional media. Specifically, we conduct ten interviews with members of the advertising industry to develop an understanding of this engagement and empowerment. Findings suggest that advertisers are very aware that new media creates an opportunity for engagement, however, feedback is interpreted subjectively to rationalise continued dissemination of offensive advertising messages and therein advertisers are empowered.

Introduction

There appears to be a growing number of organisations using controversial advertising in an attempt to capture attention and create brand awareness (Pope, Voges, and Brown 2004). More recently, new media environments provide an opportunity for advertiser empowerment as seen with the controversial Tourism Australia advertising campaign 'Where the Bloody Hell Are You' which boasts over one million views of the uncut TV advert streamed on their website, with over 300,000 advertisement downloads, and 15,000 viral postcards being mailed (Tourism Australia 2006). We examine how the proliferation of new media has impacted advertiser behaviours in relation to controversial advertising given that an advertiser can still show offensive advertising online via new media, despite a ban by the self regulatory board in relation to traditional media.

Offensive Advertising and Traditional Advertising Regulation

Offensive advertising can relate to offensive products or offensive execution (Barnes and Dotson 1990) with much academic focus relating to controversial products (Waller 1999; Prendergast, Ho and Phau 2002; Waller 2005) rather than controversial execution. Offensive executions may include depictions of anti-social behaviour, indecent language, nudity, racist, sexist or exceedingly personal material (Waller, Fam and Erdogan 2005). It should be noted that judgement of offensive execution is ultimately found in an individual's ethical opinion (Arthur and Quester 2003; Dean 2005). In most countries, advertising is regulated by a variety of frameworks in order to ensure that it does not offend, mislead or deceive the general public. While these regulatory frameworks range from full government regulation to very minimal intervention, the most widely-used system is advertising self regulation (Boddewyn 1989, Rotfeld 1992, Harker 2004). The traditional process of self regulation means that when the public does not agree with the advertisement they see in the media, they can lodge a formal complaint with the self regulatory body. The board makes a ruling on the complaint, either upholding it or

dismissing it. If upheld, the advertiser is asked to remove the offending advertisement. New media, however, allows advertisers further communication opportunities. Even though an advertisement may be banned in traditional media, the campaign may continue in new media. An example of this is with the *Where the Bloody Hell Are You?* campaign (Tourism Australia) where more than 70,000 website hits were recorded on the day the television advertising was banned in the U.K. and the commercial was downloaded by people in 80% or 156 of the world's 191 nations (Cubito 2006). Certainly, there is a body of case-based evidence suggesting that banning an advertisement actually escalates internet interest.

New Media and Advertising Regulation

While there is no accepted definition for new media, commonly there is an element of digitality in message production or reception (Arola 2007), the medium is interactive and engaging, and messages may be disseminated via viral email, MySpace, You Tube, Facebook, or even Weblogs. Advertising regulatory bodies do not regulate new media and as such, it provides advertisers with an opportunity to sidestep rulings or bans passed by the regulator so that a campaign can have a second life despite traditional media restrictions. For example, Fran Bailey Australian Tourism Minister in reference to the 'Bloody Hell' campaign does not believe the removal of the advertising billboards damaged the promotional campaign, saying "we're not at all concerned about it [the ban], because the ad goes out on television, film, digital and print media and we're still getting the fantastic hit rate and results from the ad" (Anon 2007). Similarly, Waller (2005) notes that there are positive flow-on effects from controversial advertising and that these may include extra publicity, as well as the ability to create buzz triggered by viral and new media campaigns that can be leveraged by the advertiser (Waller 2005). That is, an advertiser facilitates this process by providing material for distribution on You Tube, their website and benefit from the power of publicity.

Research Question and Method

To date, research is silent on advertiser perspectives regarding the use of new media as a proactive or reactive strategy to advertising regulation. From an advertiser or agency perspective, new media enables distribution of original, albeit potentially offensive, advertising executions. These new media are exponentially powerful due to the proliferation of information technology and the fact that new media allow for continuous electronic updates and rapid communication with multiple individuals simultaneously. Therefore, this research asks the question: *What impact is new media having advertiser empowerment in the self regulatory process?* To answer this question, a convenience sample of five advertising agencies based in Sydney and Perth resulted in ten in-depth interviews. Interviews were conducted in the offices with five Creatives, two Media Planners, and three Account Service staff. All interviews were conducted at the informants' place of business. Informants were asked to: describe their monitoring of complaints and feedback regarding their advertising campaigns; discuss the impact of new media on their campaigns; discuss their use of new media as part of their campaigns, and comment on the impact that the general public feedback has on their campaigns. In the first step of the analysis, one author and their research assistant read each transcript individually and recorded the key categories of information. The process was iterative whereby a second and third author also categorised the information independently. In the second step, three authors worked together to discuss and integrate the thematic categories that had arisen from the initial analysis.

Disagreements were explored in detail until agreement could be reached. The analysis follows normal interpretive actions (Strauss and Corbin 1998). Finally, quality controls were enhanced given that two researchers provided independent interpretations of the findings and secondly, colleagues performed independent coding of the transcripts and thirdly, these researchers also conducted all the personal interviews with the advertisers, thereby minimising bias (Lincoln and Guba 1985). Inter-rater reliability was acceptable with a rating of 85%.

Results

Advertising practitioners agreed that engagement is a key benefit of new media where they are able to interact with the general public and assess their brand experience and responses to advertising exposure across both traditional and new media contexts. Advertising practitioners felt that they were more engaged with the general public through client website feedback and through the regulatory body or trade media. It is through these new media that advertisers can view complaints, comments and feedback from advertising campaigns, albeit this is typically a reactive rather than proactive process.

> *'we don't get as much direct feedback from consumers because they always see the ad for the creative and so complain firstly to the media house where they saw the ad such as Channel 9/Woman's Day/ 2Day FM etc. They may find out the name of the creative agency and then complain directly to us'* [Media 2].

Certainly, advertisers felt more connected with the general public based on such access and this was not limited to just a reactive process. Advertisers recognised that there were benefits when they are proactive in their use of new media to create public engagement. Being proactive in seeing this engagement included loading agency creative executions onto Myspace and You Tube, as well as monitoring general public feedback and any complaints by using electronic monitoring of advertising websites such as Adrant, Ads of the World.

> *'We use new media to supplement our campaigns. For example, we have loaded content onto You Tube and this has allowed access to international audiences. We also pick up on some feedback / commentaries that appear in new media such a viral email, Myspace, You Tube, Facebook, Blogs and Moblogs'* [Advertiser1].

Informants consistently observed a closer relationship between the general public and advertisers as a result of new media. Informants noted that they felt closer to the general public because they were privy to what audiences are saying about the brands and the advertisements. The new media forums allow advertisers to listen to conversations between audience members and this can be used as feedback. That is, new media gives consumers a forum in which to discuss anything that they want with a wide community of people.

> *'The biggest thing to realise here is that like it or not, your consumers are talking about your products regardless of whether you are in new media'* [Media 2].

This engagement is enhanced when feedback in not only sought through new media but when the campaign uses some form of new media in the media mix. Informants suggest that channelling advertising through new media enables advertisers to have a quick turnaround in terms of

feedback, allows them to test the waters, and to see the impact of their creative immediately through hits on websites or even if the execution ends up in their own email inbox. For example:

> *'Online media is a fantastic way of measuring your audience responses to a new piece of creative because we can immediately see if anything comes up in blogs, how many hits it gets on You Tube* [Media 2].
> *'When you use new media it brings the consumer [and general public] much closer.* [Creative 2].
> *'... target specific blogs have been a great source of feedback. Websites [that we set up] provide independent feedback lets us know if we are on the right track'* [Media 1].

While new media appears to draw advertisers and the general public closer together, the ensuing impact of general public feedback and complaints by the general public draws mixed responses when asked about actions that result from the feedback. There are varied opinions about being equally responsible and accountable to the target audience as well as the general public. Consistently, informants suggest that while they are engaged with the public and view feedback, however their responses seem to be impacted by their perceptions about whether it is a 'majority' opinion and seem wary of being too responsive without full analysis of the situation.

> *'We have had regulator comments regarding a feminine hygiene product, it is very interesting to then go online and see the passion that has been ignited by consumers. They are blogging about this ad on You Tube and they are creating face book sites such as 'Beavers United' and 'Save the U by Kotex Beaver'. We can see that new media shows us that it is not only the voice of the people writing into the standards boards that we need to take on board, but the voice expressed in new media'* [Media 2].

Clearly, while pushing the boundaries of controversy is appealing because the advertisement is getting noticed, the decision to alter a campaign is determined by the general public as the 'ultimate judge'. The following passage reinforces again, that an advertiser's responsiveness to general public feedback is impacted by their perceived 'majority' rules mindset.

> *'There is no such thing as bad publicity I think. Even if people hate an ad, you have their attention. The general public's response is more important than the clients or the ad executive'* [Creative 3].

Overall, advertisers were positive and felt empowered by new media, albeit noted that you have to be prepared for good and bad feedback that may ensue. Further, the level of empowerment was noted to be category specific. Respondents note that despite the existence of new media, their ability to create controversial executions are still restricted by several factors such as the client and the related product category, as well as agency codes of conduct.

> *'Many of our clients are quite conservative, any complaints or negative feedback is taken into consideration immediately and action is taken and we wouldn't then channel the execution to new media. We cannot afford to be too risqué or ignore feedback as the brands are conservative and need to be seen as a socially responsible corporations'* [Accounts 1].

'As they tend to say, any publicity is good publicity. I would say this largely can be said of any word of mouth that a particular campaign generates (good or bad). I will however caveat that with the point that it very much depends upon the category in which you play' [Media2].

Finally, in terms of responsiveness to complaints, informants noted that nobody is going to be entirely happy or unhappy with your brand, but new media at least allows more balance in the feedback that is being channelled to advertisers. In contrast, traditional complaint mechanisms are perceived to be non representative of the public who are thought to be the ultimate judge rather than a perceived 'minority' group. Overall new media seems to create engagement and advertisers are 'tuning in' when it comes to feedback, but their decision making and response to the feedback is subjective and certainly selective. New media provides not just a feedback mechanism but an outlet and opportunity for continued controversial advertising. New media allows advertisers to hear general public feedback they do not necessarily listen nor take action and when it comes to decisions about controversial advertising, it is the interaction between advertiser, audience, product category and client that appears to impact.

Discussion and Conclusion

For advertising professionals, there is recognition that new media creates an opportunity for engagement with the general public and also creates opportunities to communicate controversial messages. Advertisers believe they are more engaged with the general public for several reasons: they can collect feedback in a timely fashion, and this feedback comes from diverse publics. Advertisers felt that feedback gathered through new media was more reliable than minority complaints that are directed to agencies via regulatory authorities. Further, feedback that is channelled via new media is thought to be more balanced and better able to inform decision making because it includes both positive and negative comments while in contrast regulator feedback revolves solely around complaints.

Beyond engagement, advertisers certainly appear to be empowered by new media as it allows for expanded interaction opportunities with their audiences. Advertisers appear to use feedback to not only assess public opinion but feel they are able to 'tune in' to what diverse audiences and the general public are saying about their campaigns so that they can draw confidence in their executions and rationalise continued dissemination. That is, advertisers appear to be in a win-win situation where they use new media to both project and evaluate their controversial advertising. Their decision making about the controversial advertising is based on their subjective interpretation of the feedback being a 'majority' opinion, and therein are empowered in their decision making about continued dissemination. Advertiser empowerment is attenuated by new media given they can continue to interact with audiences using executions that may banned in traditional media. Advertisers acknowledge that they have the power to distribute advertising, even controversial or banned advertising, through website downloads and sometimes purpose-created websites which bear the name of the advertising campaign. This not only gives them more control of the distribution of advertising, but also gives them access to a free distribution network. An overt strategy to use new media in order to sidestep regulators appears to be moderated by clients and target audiences more than ethical decision making.

Advertisers are aware that new media allows dissemination of controversial executions beyond those permitted by regulatory authorities, and their decision making to create controversial campaigns appears to be bounded by client and product category rather than new media feedback from the general public. Therefore, while advertisers do not function without restraint, they are more powerful in their decision making consequent from new media. Certainly, this research suggests that advertisers are very much empowered in this new media environment, however, research needs to consider the role of new media in terms of audience empowerment perspectives.

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