

# The World Situation of Public Service Broadcasting: Overview and Analysis

**Marc Raboy**

Department of Communication  
University of Montréal  
Montréal, Québec, Canada

## **Introduction**

This international Round Table on the cultural and educational functions of public service broadcasting comes at a fortuitous time, as the changing environment of broadcasting is on various agendas, from the Council of Europe to the numerous national states grappling with the challenges to their national communications systems; from the G7 and its grand design for a global information highway to the burgeoning number of non-governmental organizations active in the field of mass communication. At the heart of these debates is the question of the present and future status of public service broadcasting.

Meeting in Prague in December 1994, the Council of Europe's 4th European Ministerial Conference on Mass Media Policy identified the safeguarding of independent, appropriately-funded public service broadcasting institutions as essential to the functioning of the media in a democratic society. The Council's draft resolution on the future of public service broadcasting included a nine-point mission statement reiterating, in a particularly European perspective, the traditional objectives of public service broadcasting.' Such statements, for all their worth, also point to the obstacles faced by conventional public service broadcasting in the current global context. In the contemporary debates on the changing environment of mass communication, there is no shortage of earnest outlines of goals and objectives for media with aims other than business or propaganda. There is no shortage of good will, or good ideas, but the realization of the ideals of public service broadcasting is rendered problematic by a series of political, economic, technological, ideological and developmental constraints.

In many parts of the world, the problem is still totalitarianism, and the equation of the public interest with the particular interests of the national state. Where totalitarianism has been overcome, the problems facing media in the transition to democracy are often the best example of the problems of democratization generally. In Eastern Europe, in most of Africa, and in much of the rest of the transitional world, public service broadcasting is a distant ideal, not yet a working reality. In those countries where the leadership has embraced that ideal, the lack of a receptive political and professional culture is often the next hurdle. Where neo-totalitarian or neo-colonial governments seek to retain power at all cost, the lack of autonomy of national media is also a problem of political will.

In the heartland of traditional public service broadcasting, Western Europe (and in countries with similar systems such as Canada, Australia and Japan), the vogue towards liberalization and market reform mixed with a lack of official faith in the continued importance of public service broadcasting leads to a syndrome where precious experience is being washed away. Problems of financing, problems of mandate, interpretations of purpose point, here too, to a more fundamental problem of political will. What is there in common between a country such as Cambodia, seeking to build a national broadcasting system virtually from scratch, and the G7 member seeking to trim its deficit by attacking the tax base of public service broadcasting? On the surface very little. But in fact, national peculiarities apart, questions concerning the structures of broadcasting are

increasingly global ones. In the new broadcasting environment, the issue of public service broadcasting reduces to: what is it to do, and how is it to be paid for? Or put another way, what social and cultural goals attributed to broadcasting require a specially mandated, non-commercially driven organization, publicly owned, publicly funded to the extent necessary, and publicly accountable?

Broadcasters, politicians, media professionals and creative people, community activists and scholars world-wide are wrestling with these questions today. While the diagnosis is global, the prescriptions are necessarily context-specific. When we put them together, however, we find in the range of models, examples and ways of framing the issues, the basis for their global portrait, and a sketch of a solution.<sup>2</sup>

### **Changing Structures of World Broadcasting Systems**

Fifteen years ago, when the International Commission on the Study of Communication Problems chaired by the late Sean MacBride reported to UNESCO, the structure of the world's broadcasting systems was a relatively unproblematic affair. The subject occupied a mere two pages in the MacBride Report, where public service broadcasting did not even require a separate index entry (UNESCO, 1980).

In 1980, national broadcasting systems could be typed according to the prevailing political systems in each of the countries concerned. Most European countries had a single monopoly broadcaster - although operating according to very different sets of principles in the West and in the East. In Africa, too, national broadcasting was strictly government owned and operated. At the other extreme, the American free enterprise model of broadcasting was operational in most of Asia and the Americas (with notable exceptions). The number of countries with "mixed" systems was small (the MacBride report mentioned the UK, Japan, Australia, Canada, and Finland). Where it existed, community broadcasting was a strictly local, marginalized phenomenon with few links to the mainstream. In 1980, the letters CNN did not have the evocative authority they do today.<sup>3</sup>

Since that time the world has changed. The evolution of broadcasting has been marked by the following three sets of parallel developments:

1. the explosion in channel capacity and disappearance of audio-visual borders made possible by new technology;
2. the disintegration of the state broadcasting model with the collapse of the socialist bloc and the move towards democratization in various parts of the world; and
3. the upsurge in market broadcasting and the introduction of mixed broadcasting systems in the countries with former public service monopolies.

Far from being distinct from one another, these phenomena are in complex interrelationship with respect to the emergence of new forms of broadcasting, locally, nationally and internationally. The consolidation of a world broadcasting market has been abetted by the collapse of the iron curtain, just as that process was accelerated by the technological obsolescence of attempts to control access to information and the means of communication. At the same time, the re-evaluation of welfare capitalism — spurred on by an uneasy marriage of ideological and economic considerations — coinciding with the arrival of the new generation of broadcasting technologies, has further strengthened the market model. It also undermined the view that broadcasting is a sphere of activity analogous to education or health care — that is to say, a primarily social and cultural rather than an economic or political activity (Servaes, 1993: 327).

As *The Economist* magazine put it in a major report in 1994, television has changed the world but the world has not (yet) changed television:

*Television is a one-way conduit for entertainment, sports and news, broadcasting in real time to a passive, mass audience. It plays, you watch. If what is on does not appeal, you change channels; if nothing appeals, you are out of luck. Satellites do nothing to alter this model of television. They just transmit it to more people in more places (The Economist, 1994: 4).*

Until the 1980s, television was mainly limited to the OECD and Soviet bloc countries. Since then, the number of sets has tripled, although still unevenly distributed, and the number of satellite stations has gone from 0 to 300 (although there are still only two really global channels, Turner's CNN and Viacom's MTV).<sup>5</sup> In 1980, there were 40 channels in Europe, today there are 150. In 1993, every American home paid \$30 per month for its free television, via the cost of advertising passed on to consumers; the new broadcasting industry economics will be a dog's breakfast of advertising, subscription, and pay-per-view. But people only watch around seven channels, so the more choice there is, the less likely it is that any particular one will be among them. This is not heartening news for broadcasters.

One of the characteristics of the current context which easily leads to confusion is the blurring of distinctions between formerly distinct activities: broadcasting and narrowcasting, broadcasting and telecommunication, public and private broadcasting. The 1994 policy debates surrounding the new information superhighway have seen a flurry of new alliances and repositioning of broadcasting industry players nationally and internationally, private and public. Broadcasting will henceforth be evolving in a more complex multimedia environment, and its previous subdivisions into distinct 'domains' such as terrestrial, cable and satellite broadcasting are quickly becoming obsolete. Questions concerning the future of public service broadcasting will be played out and resolved in a broader policy framework. This means both greater constraints as well as new possibilities, but the principal normative question will remain: "What should be the public function of broadcasting in a democracy?" (van Cuilenburg and Slaa, 1993).

The context of technological convergence and the accompanying policy debates can help clarify the concept of public service with respect to media generally – and hence, to develop a more appropriate conception of public service broadcasting. In telecommunication, the concept of universal public service has been much more clear and straightforward than in broadcasting. The principle of universality has been tied to the operational provision of affordable access (not an issue in broadcasting as long as the main means of transmission was over-the-air, but increasingly so with the addition of various tiers of chargeable services).

The displacement of universal service by subscriber-based and pay-per-view services is the strongest factor favouring a shift towards the consumer model in broadcasting, and needs to be countered by policy measures and institutional mechanisms to promote the democratic function of broadcasting. This can only come about through a rethinking of what we mean by public service broadcasting.

Broadcasting may be the quintessential cultural industry (Sinclair, 1994), it is increasingly the closest thing we have to a universal cultural form (Collins, 1990). Until recently, national broadcasting systems were seen to be the main vehicles for ensuring that the national culture was reflected in broadcasting, and with the obvious exception of the USA, success in this respect was tied to a national public broadcasting system. National broadcasting systems are now for the most part more broadly constituted, and at the same time, national broadcasters control a decreasing share of every country's audio-visual space (Caron and Juneau, 1992). But are their messages any less prominent in national consciousness? This is an extremely difficult question to answer with any degree of certainty.

One important aspect of this question is to recognize the problematic nature of national identity itself. Identity today is increasingly multifaceted and national identity is a particularly contested issue in many countries, even among some of the most politically stable. This poses another challenge to broadcasting, which has traditionally been organized at the national level. Where public broadcasting has been well-established, it has almost invariably been through the presence of a strong, often highly centralized national public broadcaster. It is not only the external pressures of globalization that challenge this model today, but also the internal pressures brought about by the fragmentation of traditional notions of nationhood (see Pietersee, 1994). If public service broadcasting is to speak to the real concerns of its public, it has to rethink its approach to one of its most cherished objectives, the cementing of national unity. This may be especially difficult for politicians to accept. Traditionally, public service broadcasting has been expected to represent the national as opposed to the foreign. It maybe time to refocus these conceptual categories, in terms of the local and the global. There is a certain universal appeal to the products of Hollywood-based mass culture - that is, ultimately, the only possible explanation for their success. At the same time, specific publics will be interested in specific types of broadcasting programming. The global cultural industry recognizes this by developing products targeted to “niche markets”. Public broadcasting has a different role, principally by conceiving its audience as a public rather than a market. Some programmes may speak to a particular national public, but on any given national territory there will be less-than-national broadcasting needs to be fulfilled. National networks, publicly or privately owned, can no longer be expected to be forces of cohesion; they can, however, be highly effective distribution systems for programmes of importance to the communities they serve. For this to occur, we need a new definition of public service broadcasting, suitable to a new public culture, global in scope and experienced locally.◦

The idea of public service broadcasting is not intrinsically tied to that of nationhood, rather with that of the public, and broadcasting, as a form of communication, with that of community (Carey, 1989). Therefore, we need to take a fresh look at public service broadcasting in the context of a changing role for the still present, still formidable (for lack of a structure to replace it) nation state. As the alternative to the state becomes the market, the alternative to public service broadcasting is construed as private sector broadcasting; this is logically flawed as well as politically short-sighted. The globalisation of markets is both global and local (global products are usually produced in a single place, distributed world-wide and consumed locally, everywhere). As the nation state is left marooned between the global and the particular (Ellis, 1994), so is public service broadcasting. This might explain the success of speciality services, and the economies of scale justified by global products in search of small local markets;

but it is false to assume this means there is no longer a social need for public service broadcasting; it rather demands redefinition, for as Ellis (1994) has stated, only public service broadcasting “puts a social agenda before a market agenda”.

In this context, the idea of public service broadcasting stands out more boldly than any of the existing structures set up to manage broadcasting in its name. This chapter shall look at three dimensions of this subject. The first is conceptual, and asks the question: what is public service broadcasting? The second is descriptive and analytical and establishes the portrait of the current world situation, as reflected in a typology of existing models. In the third part, we will try to refocus the issues facing public service broadcasting by suggesting a series of structural approaches that could be useful to promoting the ideal of public service broadcasting in the present economic, political and technological environment.

### **What is Public Service Broadcasting?**

The idea of public service broadcasting is rooted in the enlightenment notion of the public and of a public space in which social and political life democratically unfolds (Habermas, 1989), as well as in the tradition of independent, publicly organized broadcasting institutions created to deliver radio programmes to audiences in the period between the two world wars.

In some cases, public service broadcasting refers to one or more institutions, while in others, it is an ideal (Syvertsen, 1992).

Thus, in some countries, public service broadcasting refers to a particular organization or sector of the broadcasting system, while in others, the entire system may be viewed as a public service.

In some cases, public service broadcasting is seen as a developmental goal to be achieved. While in many cases public service broadcasting may indeed be in “crisis” (Rowland and Tracey, 1990), the ideal that it represents is certainly very much alive.

It is unnecessary here to review the origins of public service broadcasting, except to recall that both the institution and the ideal (or a certain conception of it) originated in the experience of the BBC and its founder Sir John Reith (see McDonnell, 1991).

The BBC still stands as the quintessential model of public service broadcasting world-wide, particularly in the view of national governments seeking to establish or to revitalize their broadcasting systems. It is indeed often impossible to separate the idea from the practical example of the institution, but do that we must.

While the BBC is probably still the most successful example of a national public service broadcaster, and the UK among the most successful at anticipating and adapting to the new context of the 21st century, it is not necessarily an appropriate or easily transportable model for many situations. The ideal, on the other hand, is a universal one – to the extent that democratic values can be said to be universal.

There is no easy answer to the question “What is public service broadcasting”, but a reasonably thorough attempt was made

some years ago by the UK's now defunct Broadcasting Research Unit, in a pamphlet first published in 1985 (BRU, 1985/1988. See also Barnett and Docherty, 1991).

The BRU document presented those elements of public service broadcasting which “should be retained within whatever systems are devised to provide broadcasting as new communications technologies come into use. It is not therefore a defence of the existing public service (broadcasting) institutions as they are today or as they may become; it is concerned with the whole landscape...” (emphasis added).

The BRU approach supported the view that broadcasting should be seen as a comprehensive environment. Its “main principles” can be summarized as follows:

1. universal accessibility (geographic);
  2. universal appeal (general tastes and interests);
  3. particular attention to minorities;
  4. contribution to sense of national identity and community;
  5. distance from vested interests;
  6. direct funding and universality of payment;
  7. competition in good programming rather than for numbers;
- and
8. guidelines that liberate rather than restrict programme makers.

As public service characteristics, the list also points to the inherent pitfalls of such an exercise. While some of the characteristics (i.e., accessibility) are straightforward enough, certain others (i.e., contribution to a sense of national identity) are highly problematic, insofar as in many states (including the British) the question of nationhood itself is not fully resolved. Distance from vested interests implies an ideal situation where the broadcasting institutions do not have their own vested interests. A notion such as good programming begs the question of taste: good, according to whom?

The real problem, however, is not how to improve the list but rather how to apply any such set of principles. Indeed, the exercise points to a need to return to even more fundamental values regarding broadcasting and its role in society (Blumler, 1992).

“Traditional value judgments concerning the objectives of public broadcasting provide inadequate guidance to broadcasters and policy makers about how to decide what resources should be allocated to public broadcasting as a whole and to the different components of public broadcasting”, concluded Robin Foster on the basis of the British debate, in a 1992 report to the David Hume Institute (Foster, 1992: 24). Foster’s analysis led to the suggestion that viewers and listeners should be consulted regarding the level of resources to be put into particular types of programmes – a proposal not likely to be endearing to broadcasters or policy-makers, although logical and coherent with respect to both public policy objectives for broadcasting and the prevailing discourse of consumer sovereignty. “As an input into determining the public broadcasting contract, ways should be found of establishing what the public wants public broadcasting

to be; giving the public involvement in deciding what is provided” (Foster, 1992: 31). This raises another important issue: what do we mean by ‘the public’?

Numerous authors have been engaged with the need to redefine our conception of the public in light of the changing nature of late 20th century mass media (See, for example, Curran, 1991; Garnham, 1992; Dahlgren 1994). If this is relatively straightforward for certain actors in the sphere of broadcasting – advertisers, for example, who conceive of their target as a market, or ratings-driven broadcasters who quantify it as an audience - it is not so evident for public service broadcasters and the makers of public policy. Smith (1991) has noted:

*Broadcasting takes place in the public sphere and we come to it both as consumers and as citizens. There is no fixed definition of the public service dimension in broadcasting. It changes with the altering circumstances of politics and social conceptions of need... In the context of the burgeoning market-place of programmes, and of channels public service itself changes in emphasis, without diminishing the salience of its earlier meanings, which originated with the scarcity of frequencies but also in the nature of the medium of broadcasting itself. Where commercial broadcasting is linked to the social world by means of markets, public service derives its legitimacy from the role its viewers play as citizens.*

The notion of citizenship has severe implications for broadcasting. Citizenship can not be passive. Citizenship is political. Citizenship evokes the image of Tom Paine and the unfinished

struggle for “liberty, equality, fraternity” (Keane, 1991, 1994).

When public service broadcasting is linked to the idea of citizenship, it must logically be decoupled from the authoritarian power of the state. At the same time, it can not be commodified. This is not a question of principle but of purpose. The main point of distinction between public service and private sector broadcasting is that the latter is only commercially-driven, while the former, despite the various shapes and forms it assumes from time to time and place to place, is necessarily propelled by a different logic. It is critical to understand the subtleties inherent in this distinction. Within the realm of conventional public broadcasting, there are two schools of thought regarding commercial activity. One has it that commercial and public service objectives are wholly incompatible and cannot be combined within a single service. The other view is that they can coexist and public and private broadcasting can compete in the advertising marketplace to the mutual benefit of both. Without seeking to resolve this dilemma, I would like to suggest that there is a third conceptual and structural approach to this question: assuming that certain activities of broadcasting can be financed commercially and others can not, why not redistribute the benefits of the commercial sector to finance the non-commercial sector? This systemic approach is partially recognized in some countries which legally define their national broadcasting systems as public services, thus legitimating the regulatory intervention of the state; but it is not operationalized

anywhere through the appropriation of the fruit of lucrative activity to subsidize the rest. It is just assumed – with no basis in logic, only in ideology - that commercially viable broadcasting should be left in the private sector and unprofitable broadcasting activity should be subsidized in some other way. On the other hand, one could just as logically argue that, insofar as the social basis of broadcasting is public service, the profits of the lucrative sector should be redistributed within the system. If this is an unlikely formula, it is not because of any conceptual flaw, but because of broadcasting's capture by private industry.

Indeed, the leaders of the global broadcasting industry have turned this idea on its head by claiming that the product they are selling is a public service. As early as 1960, CBS Executive Frank Stanton proclaimed that “a programme in which a large part of the audience is interested is by that very fact... in the public interest” (quoted in Friendly, 1967: 291). More recently, Rupert Murdoch has stated: “Anybody who, within the law of the land, provides a service which the public wants at a price it can afford is providing a public service” (quoted in Ellis, 1994: 1). To the extent that ‘the public’ is just another way of describing the aggregate consumer market for broadcasting, they are of course correct, which is why, once again, it is important to get the terminology straight. Meanwhile, the idea of public service broadcasting has been undermined by the erosion of the public commitment to the service that has been provided by actually-existing public broadcasting institutions. In many cases, this erosion has been egged on by the abuse of the term by national governments seeking to use broadcasting for a higher national purpose, claiming that this is in the public interest.

As Ellis (1994) points out, the continuing role of the nation state is not to act as the bearer of national unity or the essence of national identity, but to negotiate antagonisms and set the limits of acceptable communal behaviour. In this context, there exists a need to establish a consensus that holds civil society together, regardless of the disparate elements making it up. Such a consensus can only be based on shared conventions, relying increasingly on the rituals of communication. The role of public service broadcasting in this context is to provide a space in which social antagonisms can be explored and worked out, not cater to accentuating difference, as commercial multi-channel broadcasting has a tendency to do. “No longer an agent of national unity, public service broadcasting can provide the forum within which the emerging culture of multiple identities can negotiate its antagonisms”, notes Ellis (1994: 14). Exploring new possibilities for consensus rather than imposing it, is the opposite of the former role of public service broadcasting - which goes quite a way to explaining why the traditional strategies of the major national public service broadcasters no longer work, and why they are in trouble as they seek to accommodate a new *raison d'être*. “We have been so preoccupied by the challenges to Public Service Broadcasting from within broadcasting that we have failed to notice the profound

changes that have taken place in the public whom broadcasting is supposed to serve” (Ellis, 1994: 16).

Public broadcasting is first of all a public good (Garnham, 1994), and “public goods are goods which cannot be appropriated privately. If such a good is supplied, no member of the collectivity can be excluded from its consumption. Therefore, public goods must be produced by institutions other than a market economy and distributed by a mechanism different from markets” (Berger, 1990: 128). The first step is determining what makes public broadcasting a public good; this is not immediately self-evident, which is what Yves Achille (1994) means when he writes that public service broadcasting is suffering from a crisis of identity. Achille refers to a triple crisis of public service broadcasting: identity, financing and functioning. If the identity crisis could be resolved, the financial problem – essentially a question of political will – could then be addressed. As to the fictional question, in countries with an established public service broadcasting tradition, nothing less than a zero-based review of existing institutional structures can bring public service broadcasting into the 21st century with a hope of building public and political support for its new role.

In a broadcasting environment that treats the public as a body of clients or consumers, the role of public broadcasting is to address people as citizens. Public broadcasting can do this only if it is seen as an instrument of social and cultural development, rather than as a marginal alternative service on the periphery of a vast cultural industry (see Raboy, *et al.*, 1994).<sup>7</sup> This implies a freshly conceived role for the state, which must see itself more as architect than as engineer: that is to say, the role of the state is to design and facilitate the functioning of a multi-faceted national broadcasting system, rather than as the directive patron of a dedicated national broadcaster.

“The crucial choice”, as Graham Murdock has written, “is not, as many commentators suppose, between state licensing and control on the one side and minimally regulated market mechanisms on the other. It is between policies designed to reinvigorate public communications systems which are relatively independent of both the state and the market, and policies which aim to marginalise or eradicate them” (Murdock, 1992: 18). The object is to create “a new kind of public communicative space, rooted in a constructive engagement with emerging patterns of political and cultural diversity” (Murdock, 1992: 40).<sup>8</sup>

One of the most difficult conceptual new fields to open is that which seeks to look beyond the exclusivity of traditional institutions to imagine new vehicles for meeting public service objectives. Here, a progressive approach to public broadcasting can take a page from experiences with development. Indeed, strategic intervention in broadcasting can take a page from the sustainable development model. Development theory, once built around the idea that the introduction of full-blown communication systems to traditional societies would hasten “modernization” and hence economic, social and political development,

has gradually adjusted to the notion that small-scale horizontal communication operating at the grassroots level can be more beneficial in fostering autonomy and endogenous development (O Siochru, 1992).

In this context, small scale media technologies, opportunities for indigenous cultural expression through such means as theatre, puppetry and video, exchanges between communities via computer, telecommunication and broadcasting, can often be more appropriate for meeting the objectives of democratic communication than conventional broadcasting institutions centrally organized at the national level. In countries where these do not even exist, it can be more politically fruitful to conceive of meeting public service broadcasting objectives at the community level. This does not obviate the need for national broadcasting, but as with so many development issues, the choices to be made involve strategic priorities. In fact, the social demand for local and regional broadcasting is pronounced even in the most developed countries, and one of the most bitterly expressed criticisms of the dominant national public service broadcasters is their tendency to abandon local and regional needs as they retrench around high-profile prestigious national services.

### **Public Service Broadcasting: the World Situation**

In this section, I shall develop a typology of the various existing models of broadcasting one encounters in the contemporary broadcasting environment. Such an exercise is necessarily fraught with pitfalls, and requires some indulgence on the part of the reader. The typology is meant to be inclusive rather than exhaustive, insofar as it aims to provide an accurate portrayal of existing types, without pretending to cover every particular situation. Let me first of all distinguish between two general levels, which I call the 'systemic' and the 'institutional'. To clarify this distinction, a mixed broadcasting system in which one finds both public service and private commercial broadcasters is a type of systemic model; a national public service broadcaster, a private enterprise broadcaster, or a community broadcaster is an institutional model.

Despite the rapid movement towards globalization, broadcasting is still legally constituted within the confines of national borders. Although there is a great variety in degree of attention by the world's 200-odd national states, every state must at some point take some fundamental decisions about broadcasting, if only to consider the allocation of frequencies to which it is entitled by international conventions. The immediate result of these decisions is a national broadcasting system in every country, made up of one or more component parts.

Despite the great variety from one country to the next, we can essentially identify three types of 'core' system, that is, systems which while possibly encompassing other forms of broadcasting, are essentially built around a 'core' constituted by a particular institutional model. The notion of 'core' includes a strong historical

component, because as we shall see, in many cases the current context is marked by an important movement away from the traditional basis of national broadcasting, towards something else which may not yet be easy to define. At present, we can identify three principal types of broadcasting system, namely (i) 'public service core systems', (ii) 'private enterprise core systems', and (iii) 'state core systems'. The latter category is further characterized by sub-divisions that we can identify as 'residual', 'emergent' and 'transitional'.

### **Public Service Core Systems**

These systems have evolved around the former public service monopolies (most of Western Europe), or where independent public service broadcasters have historically occupied the centre of the system (Canada, Australia, Japan). The dominant model in Western Europe until the 1980s, public service monopolies were characterized by their strong public service remits and the lack of direct competition, as well as a relative degree of autonomy from the state, varying from country to country according to national tradition. Nearly all of these have become "mixed" ownership systems today, and some would argue that traditional public broadcasting is becoming increasingly peripheral with the rise of the market sector in many of these countries, to the point that it can even be considered a residual form on its way out. This is doubtless too apocalyptic a view, especially if one considers that in some of these same cases, the system as a whole is still legally constituted as a public service. In any event, no country has done away with conventional public service broadcasting, and wherever it exists no important development in broadcasting can fail to take it into account.<sup>9</sup>

Mixed public-private ownership systems were pioneered in Canada and Australia in the era of radio. In Europe, Britain and Finland have had television 'duopolies' since the 1950s. Increasingly the dominant model in Western Europe, and a more-or-less explicit goal in many other parts of the world, mixed systems are characterized either by the economic insulation of one sector from the other (as in Australia, the UK or Sweden, where public service broadcasting is out of the advertising market), or by competition for advertising (the extreme example being Spain, where public television is exclusively financed by advertising, the same as the private sector). As public broadcasters become providers of subscription-based services, this area is opening up to financial competition as well. Mixed systems are characterized by strong competition for audiences and, in the older systems with strong public service traditions, by regulatory requirements to ensure that private sector broadcasting contributes to the overall welfare of the community and to the social and cultural objectives of broadcasting.

We can also distinguish between the 'mature' mixed systems of the older, more stable democracies with relatively strong economies, and the 'immature' ones of emergent and transitional

societies. Mature mixed systems, such as Canada's, are also characterized by various forms of cross-subsidization leading to an increasing hybridization of both public and private broadcasting (for example, the presence of advertising, or the availability of public funding for broadcast production, equally available to both public and private sector broadcasters). Competition tends to be more severe in the 'younger' mixed systems (for example, France or Sweden), but is generally leading to a disturbing flattening of the recognizable distinction between public and private broadcasting (Atkinson, 1993; Paracuellos, 1993; Achille and Miège, 1994). To some analysts, however, the mixed ownership structure is still a far preferable guarantee of broadcasting pluralism and diversity than the private enterprise core model that is held up as the alternative (Syvertsen, 1994).

### **Private Enterprise Core Systems**

These are those national systems built around commercial broadcasting practices, where the role of the state has traditionally been limited to frequency allocation and regulation of privately-owned broadcasting undertakings. The most important example of such a system is obviously the United States. Private enterprise core systems are the rule in most of Latin America and parts of Asia, and have played an important role historically in cross-border commercial broadcasting originating from countries such as Luxembourg. A private enterprise core system is not necessarily incompatible with attempting to regulate broadcasting in the public interest, as the US Federal Communications Commission experience illustrates. In most countries where the mainstream of broadcasting is in the private sector, alternative forms have arisen to provide the range of programming that would not normally find its way into the schedules of commercially-driven broadcasters. The best example of this is the US itself, and its National Public Radio and Public Broadcasting System. In much of Latin America, the main alternative to private enterprise broadcasting is community-based.

### **State Broadcasting Core Systems**

These systems include the 'residual' systems of countries which have not yet broken with the tradition of a single, monolithic national broadcaster, as well as 'emergent' systems which, although built around a state-owned and controlled broadcaster, are opening up to alternative commercial and community voices, such as one finds in parts of Asia and Africa where democratization is on the agenda. Many countries in those regions are seeking to develop new models appropriate to their particular needs, and emergent systems are currently experimenting with various combinations of public, private and community elements in a perspective that views broadcasting as a resource for social development. South Africa, where a nominally public service broadcaster was for so many years one of the main political instruments of the

apartheid state, provides one of the more stunning examples of what we call an emergent broadcasting system.<sup>11</sup>

The former Soviet-bloc countries of East-Central Europe and the ex-USSR provide a particular sub-group here which we would describe as 'transitional', insofar as they seem to be more inclined towards the existing dominant models. Here, pluralistic broadcasting systems are being established on the foundations of former state authoritarian monopolies. These vary widely at the present time, and are evolving so rapidly that any attempt at detailed classification is bound to be quickly eclipsed by events. Generally, all of these countries have introduced some form of private sector commercial broadcasting and retained some form of government-owned broadcasting that could be plotted more or less on a continuum from state control to arm's length. Some have also grappled with the objective of setting up West European style public broadcasters, as well as allowing space for a 'civic' or community sector.<sup>12</sup>

One of the striking characteristics of the current world situation is the remarkable cross-fertilization of various broadcasting forms, resulting in a rapid shrinking of systemic differences across the core systems that have just been described. Indeed, it is obvious

that we are moving towards a global media system – requiring that broadcasting issues be addressed, eventually, in a global political forum.<sup>13</sup> But there are still vast differences between specific types of broadcasting undertakings, which makes it important for us to address the second level of our typology: institutional models.

By institutional models, we mean the particular forms of broadcasting one finds across the range of existing core systems. These are characterized by different forms of ownership and control, mandate, modes of financing, types of content and relationship to their audience. Institutional broadcasting types are not autonomous of the systems in which they develop, and often exist in symbiotic relationship with their neighbors. The main general categories are as follows: (i) national public service broadcasting; (ii) alternative public broadcasting; (iii) privately-owned commercial broadcasting; (iv) multiple ownership services (public-public or public-private partnerships and joint ventures); (v) community broadcasting; and (vi) state broadcasting.

While certain systems and institutions could prove difficult to categorize precisely, this typology is sufficiently inclusive to enable us to determine the main trends and tendencies in broadcasting in the world today. In addition, recognizing the different institutional models can be of important suggestive value to broadcasting planners and policy makers.

### **National Public Service Broadcasting**

This model is characterized by a more or less independent status *vis-à-vis* the national state; more or less because, in spite of a legal arm's length relationship to the government of the day, crucial aspects such as funding and administrative structure are still subject to political decisions.<sup>14</sup> National public service broadcasters

exhibit a wide range of sub-types distinguished by funding, mandate, and relationship to the commercial sector (Paradis, 1994).

Theoretically, funding can come from either a licence fee, a direct government subsidy, advertising, subscription, or some combination thereof. In Europe, the BBC, for example, is funded strictly by licence fee, while Spain's TVE is exclusively advertising-based. Canada's CBC and the Australian ABC receive annual parliamentary appropriations, supplemented in the Canadian case by television advertising. Japan's NHK is financed mainly by a voluntary contract with television-owners. In all of these countries, the continued purpose and legal remit of the conventional national public service broadcasters is at the heart of the debate on the future of public service broadcasting, but it is crucial to distinguish between the critique of the role of the traditional national public broadcasters and continued support for the idea of public broadcasting.<sup>15</sup> An important by-product of the critique of public broadcasting institutions has been the proliferation of new types of public broadcasting services, especially since the 1980s.

### **Alternative Public Broadcasting**

In this category we can group the 'second services' spun off of the national public broadcasting institutions in many countries with public service core systems. These are usually specifically mandated, for example, to serve minority taste cultures, or regional broadcasting needs, or in some cases (example, Sweden), were created simply to provide a second programme choice in the days of the public service monopoly. More interesting examples as a distinct model are the more recent cases, such as Britain's Channel 4, the Australian Special Broadcasting Service (SBS), or the French-German cultural channel ARTE.<sup>16</sup> These are all examples of independent broadcasters with distinct public service remits set up by national governments outside of the institutional structures of the main public broadcasting organizations.

The political peculiarities of certain countries with public broadcasting traditions have also resulted in structures created by 'less than national' public authorities, such as the Canadian provincial educational television services, or the channels based in Spain's autonomous regions (Garitaonandia, 1993). The existence of a range of services – distinguished by type of ownership, control, financing, mandate, and target audience – usually adds significantly to overall programme diversity and is a good indicator of systemic balance between generalist and specifically targeted forms of public broadcasting. The American PBS service, although created as an alternative to mainstream commercial broadcasting in the prototypical private enterprise core system, should also be included here.

### **Privately-owned Commercial Broadcasting**

Increasingly universal, insofar as it is now to be found everywhere

outside the monolithic state-core systems (Switzerland being a rare exception), private enterprise broadcasting is nonetheless characterized by important differentiation according to scope, type of service, and ownership. Channel proliferation, globalization and narrowcasting are quickly making the conventional US network model archaic, even as it is only being introduced in many parts of the world. Conventional advertising-based broadcasting is being squeezed by the arrival of subscriber-based and video-on-demand services. 'The response has been the wave of mergers between broadcasters, production companies and owners of distribution networks (cable and satellite companies), and the tendency towards internationalization and the creation of global multimedia conglomerates. At the same time, commercial broadcasting is subject to local regulation which varies greatly from country to country, and in some countries private broadcasters are required to make specific contributions to meeting national objectives in broadcasting. In the emergent and transitional former state core systems, commercial broadcasting is often at the cutting edge of shaping the new systems, especially where it is driven by independent local forces.

### **Multiple Ownership Services**

The hybridization of broadcasting services that has accompanied channel proliferation has also given rise to new partnerships between public broadcasters and private companies. Various speciality services in Canada, or the BBC's new global broadcasting channels in partnership with Pearson PLC are examples of this. In Russia, the conversion of Ostankino into a 51-49% joint venture of the Russian state and private enterprise may become a prototype for the creation of new public broadcasting services in transitional systems (although the extent to which such services can be considered 'public' remains dubious; see Richter, 1995). One should also include in this category a number of unique examples of multinational services with public service briefs, such as the international Francophone Channel TV5 or the previously-mentioned ARTE.<sup>17</sup>

### **Community Broadcasting**

Often too quickly dismissed as marginal, community broadcasting encompasses the proliferation of autonomous, often highly localized undertakings which have neither a commercial motivation nor the backing of state authorities as principals (while exhibiting characteristics of both private and public broadcasting, sometimes constituting vital alternatives to dominant monopolistic forms). In some situations, community broadcasting enjoys official legal status and is entitled to space in the system – provided it can find the necessary resources. Community broadcasting generally has little access to conventional funding sources, being of limited interest to advertisers (where regulation does not exclude it from the advertising market),

and coming far behind conventional public service broadcasting as a priority for public funding. Nonetheless, community broadcasting is often an appropriate vehicle for combining democratic, grass-roots participation and public policy objectives, notably in the area of development. Autonomous community broadcasting can usually count on broad public support, but this is not always sufficient to enable sustained activity. Since the mid-1980s, community radio and video producers have established themselves globally through organizations such as the World Association of Community Radio Broadcasters (AMARC) and the international video association Vidéazimut. Along with free enterprise broadcasting, community broadcasting is probably the most widespread model, found nearly everywhere in a wide variety of forms (see for example, Thede and Ambrosi, 1991; Girard, 1992; Jankowski, Prehn and Stappers, 1992; Lewis, 1993; Rushton, 1993).

### **State Broadcasting**

As opposed to models based in the private sector or in independent public sector institutions, a range of countries still retain close control over broadcasting activities - with a greater or lesser degree of autonomy for actual broadcasting systems. But state broadcasting can refer to a broader range of activities, including national broadcasting in state core systems of the emergent and transitional types described above, and international broadcasting aimed abroad by countries using broadcasting as an instrument of foreign policy, as well as broadcasting in general in countries with monolithic media systems. State broadcasting is not only antithetical to public service broadcasting, it is too easily confused with the idea of state intervention at the legislative or regulatory level in order to provide a public interest framework for broadcasting activity, particularly by critics arguing for the free market model.

### **Prospective for Public Service Broadcasting**

Having reflected on the idea of public service broadcasting, and developed a typology of the main systemic and institutional broadcasting models to be found in the world today, it is now time to clarify our conception of public service broadcasting in the new world context, the role that could be played by a range of broadcasting institutions with public service briefs, and strategies for dealing with various previously identified constraints. By linking the idea of public broadcasting to the notion of citizenship, we saw that it was necessary to guarantee its delinking from both the political authority of the state and the economic arbitrage of the market. The key to this is not so much a particular structure or funding formula, but a set of objectives and practices, based on democratic principles and the view that broadcasting can be a means of social and cultural development. Our overview of the world situation enabled us to appreciate the wealth of the experience of actually-existing broadcasting. It

also hints that there is no perfect model for public service broadcasting, but some models are closer than others to enabling the fulfilment of public broadcasting ideals.

I would now like to suggest some approaches to a number of contemporary broadcasting issues. These are not 'proposals', which would imply a dose of pragmatism that I prefer to leave to others for the moment, but rather, a way of looking at and thinking about public broadcasting, which suggests measures that, independent of their political feasibility, might actually make sense.

The history of broadcasting everywhere up to and including the present has shown that only through sustained public policy action can the medium begin to fulfil its potential. Historically, a combination of public pressure, enlightened self-interest and a favorable socio-political moment led governments in a number of mainly European countries to create public broadcasting institutions, placing them at arm's length from politics and sheltering them from the effects of commerce. Wherever this model was followed, public broadcasting became the central institution of the democratic public sphere, taking on increasing importance as broadcasting came to occupy more and more public space and time, and playing an important role in the democratization of public life.

Independence from politics and autonomy from the market have become the leading criteria for the definition of public space, but these have become relative values as broadcasting has spread and developed world-wide. No broadcasting organization today can function obliviously to market pressure and if politics is more acutely present in some situations than others, it is never far from the centre. More significantly, public broadcasting has had to face a rising tide of skepticism and political will, and its recent evolution has been characterized by a "struggle over decline, change and renewal" (Tracey, 1994).

At the same time, however, the limitations of market broadcasting, wonderful as a delivery vehicle for popular mass entertainment, have become strikingly evident (Garnham, 1994). The multi-channel environment provides a double-barrelled challenge for public broadcasting, obliging conventional broadcasters to adapt and opening the way to new possibilities (Avery, 1993). In the emerging democracies, particularly, the balancing act is to juggle the structural difficulty of creating new public broadcasting institutions and the pressures for integration to the global broadcasting market.

Broadcasting was conceived for commercial purposes, but public broadcasting was introduced for purposes of cultural development and democratization. By creating appropriate institutions and developing public policy accordingly, various state authorities placed broadcasting in the public interest. There is no reason why this can not continue to be done today.

For this to occur, every jurisdiction first of all needs to have clear public policy objectives for broadcasting. Next, authorities

need to recognize the necessity of independence for broadcasting organizations. Broadcasters, in exchange, need to accept accountability mechanisms which ensure the responsible exercise of their mandates (Blumler and Hoffmann-Riem, 1992). Finally, the broadcasting environment needs to be organized and structured in such a way as to maximize the use that can be made of all the resources flowing through the system.

This would require something akin to the socialization of the broadcasting sector. There is no justification for the removal of surplus value from the lucrative branches of broadcasting activity so long as public interest broadcasting objectives can not be met without public subsidy. Private sector broadcasting should have statutory obligations to contribute to overall systemic objectives, and public broadcasters should be allowed to engage in commercially lucrative activities – without being obliged to compete with themselves in order to make ends meet.

Especially given the new technological context of the multichannel environment, it is possible to organize broadcasting to encompass both market activities and public service, to maximize both consumer choice and citizenship programming. People watch programmes, not channels, and consequently the appropriate point for competition in broadcasting is the point of programme supply, with independent production companies vying for programme contracts from public service broadcasters.

Construction and maintenance of technical infrastructure can remain in the market sector but delivery service should be subject to regulated tariffs.

On the other hand, programming should be done by public corporations, in consultation with representative users councils. Suppose that in a given jurisdiction, there were two public broadcasting corporations. Corporation A would have a mandate of doing generalist public interest programming, while Corporation B's mandate would be to seek large audiences. Corporation A's work could be subsidized by the profits generated by Corporation B. Thanks to the availability of multiple channels and video recording and playback technology, the public interest objectives of both citizenship and consumer sovereignty could be met without the information and resource loss brought on by public-private competition. Yet there would be room in such a system for a private sector of regulated carriers and competitive content providers. There would also be room for a variety of public services from the national to the local levels.

Since the early 1980s, broadcasting has been a site of ideological conflict between opposing models of society, a clash of concepts of democracy as well as notions of culture and economics (Rowland and Tracey, 1990). According to one side in this conflict, the general interest demands that there be public institutions mandated to intervene strategically to guarantee quality, diversity and independence in broadcasting that other institutional arrangements can not ensure; the other view holds that regulation

and public policy regarding media are neither necessary nor legitimate. Advocates of the public service approach to broadcasting must demonstrate concretely what institutional arrangements can be expected to meet their objectives and why these are possible only through regulation and public policy (Hoffmann-Riem, 1992). First of all, they must demonstrate what public service broadcasting should do in the new broadcasting environment, and especially, what distinguishes public from private sector broadcasting (see for example, Wolton, 1992a).

Private broadcasting, it may be argued, can also fulfil public service goals. However, it is unlikely that it would bother to try, if it were not pushed in that direction by the competition and example of public broadcasters. This points to one of the most subtle arguments in favour of public broadcasting: public broadcasting sets the overall tone of the market, acts as a catalyst and serves as an example to all broadcasting services (Hultén, 1995). It also points to the need to conceptualize broadcasting as an ecological environment, requiring a healthy diet of balanced offerings as well as nurturing and protection (Raboy, 1993). Balance has until recently been guaranteed by the distinction between public and private services, but it is now threatened by two phenomena: the systemic disequilibrium shifting strongly towards private commercial services and the effects of commercialization on public services.

This shift can only be counterbalanced by an opposite one: creation of more public service mandated organizations, and removal of the pressure to meet commercial criteria. Overriding this is the legitimization of legally framing broadcasting as a public service, and consequently, considering the overall broadcasting framework as a public service environment. It is at this level that one should look at political developments such as the Council of Europe resolution referred to at the start of this Chapter. However, one has to go further to foresee a specific role for public service institutions. It is private sector broadcasting that should be conceptualized as the complementary form, providing services that public institutions can afford to abandon, not vice versa as at present. We need a world declaration situating broadcasting as a public service, comprised of different elements each with specific structural arrangements and purposes, but all dedicated to the improvement of humankind. On the basis of such a global position, individual political units could legitimately set public policy for broadcasting on their territory.

All broadcasting, to be successful, must be programme-driven. But public broadcasting is policy-motivated while private broadcasting is profit-motivated. Public broadcasting is broadcasting with a purpose: to enhance the quality of public life, empowering individuals and social groups to participate more fully and equitably. Profit-motivated broadcasting is only interested in large audiences. Policy-motivated broadcasting is interested in reaching the largest possible audience the most effectively, in light of the specific objective of the programme concerned.

Broadcasters have their own technical language for measuring this: private broadcasters, they say, are concerned with audience share, the number of people watching or listening at any point in time, while public broadcasters are concerned with reach, the number of people who tune in over a period of time. There is another characteristic to consider, but it is difficult to measure: the intensity of the experience, and its impact on one's life. Public broadcasting aims to touch people, to move them, to change them. Private broadcasting, by nature, aims to put them in the mood to consume and above all, to consume more of what private broadcasting has to offer.

This may appear to be a crude set of distinctions, but more important to consider is the extent to which existing public broadcasting has integrated the objectives of private broadcasting. Indeed, a common lament in countries where broadcasting is the most developed, is that it is increasingly difficult to distinguish the programmes of public from those of private broadcasting. This is especially the case where both sectors provide advertising. Legislators and policy makers are more to blame than broadcasters for this state of affairs. By obliging public broadcasters to compete with private broadcasters on their terrain, the quest for the mass audience, we have flattened the difference. To the contrary, where private broadcasting has been obliged to compete with public broadcasting on the terrain of quality programming, the overall quality of broadcasting service has been raised.

A fundamental aspect of broadcasting as public service is universality of access. This is increasingly problematic as broadcasting evolves towards a pick-and-choose model analogous to the news-stand, where a variety of services are offered and the consumer selects and pays for his or her choice. In this context, it is essential that public broadcasting provides first of all a generalist programme service available to all and, ideally, free of charge to the user. As we move towards newer and more elaborate signal delivery systems, public authorities will have to ensure that everyone has access to the systems where public service is provided. At the same time, systems will have to be organized so as to avoid creating situations where better, more interesting, more rewarding, and ultimately more empowering services are available on 'higher' broadcast tiers at prices which exclude users on the basis of ability to pay.

This is the basis of the arguments for a public lane on the information highway that public interest groups and non-government organizations are putting forth in national and international debates on the new information infrastructures. The issue is larger than broadcasting, but broadcasting is at the cutting edge. Technological convergence is going to require new conceptual and operational models for content-based electronic communication, but regardless of the future of conventional broadcasting in this context, the promotion of the public interest can only come through regulation guaranteeing system access for all those with something to communicate as well as for receivers.

Where is the money to come from? First of all, to the extent that political authorities, with public support, are prepared to make broadcasting a priority, it can come from the collective resources of society itself. In Canada, one recent proposal estimated that the shortfall in projected budget cuts to public broadcasting could be met by reducing a projected increase in military spending by 1%. As stated at the outset of this Chapter, it is a question of political will. There is no escaping the necessity of public subsidy for public service, but even so, major portion of the required funding can come from within the system itself. If broadcasting is recognized as a public service, the redistribution of benefits from commercial activity to subsidize the rest is a legitimate measure.

### **Concluding Remarks**

In the context of globalization, and the development of a global infrastructure for information and communication, the question of public broadcasting takes on a new international dimension as well. According to the head of the International Telecommunications Union, in the area of information infrastructures, “the gap between the information rich and the information poor is several orders of magnitude wider than in the area of basic service” (Tarjanne, 1995). In the context of the information highway, all the more reason to emphasize public services, as an equalizer, a leveller of the playing field, and an essential component of communication policies for development (see, for example, *L’Afrique face aux autoroutes de l’information*, 1995). Alongside the calls for national and global infrastructures emanating from the centre of the world media and economic system, we are starting to hear calls for a “public information infrastructure” geared to the democratic rights of citizens, as well as for a “global sustainable development infrastructure” (Schreibman, Priest and Moore, 1995).

The question of public service broadcasting is at the heart of contemporary media politics (Siune and Truetzschler, 1992). It preoccupies those who would still ascribe a social purpose to mass communication but fear that such a mission has been bypassed in the new world order dominated by unrelenting technological and market forces. But this is the short view. The question of public service broadcasting cries out for new approaches that look beyond the obvious and do not shrink from challenging received wisdom (Gustaffson, 1992). The challenge is not to defend any particular institutional territory, as it is often framed. It is rather how to invent something new, remembering that broadcasting service is first of all a public good.

### **Notes**

1. Summarized, the nine points state that public broadcasting should provide: (i) a common reference point for all members of the public; (ii) a forum for broad public discussion; (iii) impartial news coverage; (iv) pluralistic, innovative and varied programming; (v) programming which is both of wide public

interest and attentive to the needs of minorities; (vi) reflection of the different ideas and beliefs in pluri-ethnic and multi-cultural societies; (vii) diversity of national and European cultural heritage; (viii) original productions by independent producers; and (ix) extended viewer and listener choice by offering programmes not provided by the commercial sector (Council of Europe, 1994).

2. See Raboy (1996) which reports on a study undertaken jointly by the World Council for Radio and Television and the Communication Policy Research Laboratory (Department of Communication) of the University of Montreal with the support of UNESCO and the Canadian International Development Agency.

3. The Cable News Network was founded in Atlanta in 1980, and launched its international satellite channel five years later.

4. Writing and critical concern about broadcasting tends to focus on television, and that is reflected here. When we speak about broadcasting in this chapter, however, we are referring to both radio and television.

5. The 1 billion television sets in the world in 1992 were distributed roughly as follows: 35% Europe (including former USSR) 32% Asia; 20% North America (and Caribbean); 8% Latin America; 4% Middle East; 1% Africa. Set ownership was rising at a rate of 5% a year, and world spending on television programmes was \$80 billion (The Economist, 1994, based on UNESCO figures).

6. The paradoxical by-products of globalization in broadcasting are countless. Here is just to consider: the US public broadcasting service (PBS) has a larger audience share per capita in Canada than in the United States (Paradis, 1994).

7. By cultural development, I mean “the process by which human beings acquire the individual and collective resources necessary to participate in public life” (Raboy, Bernier, Sauvageau and Atkinson, 1994: 292).

8. Conceptualizing the public as citizen also requires a less paternalistic attitude towards the citizen as consumer. John Reith would no doubt recoil at the suggestion of his countryman Alan Peacock that public funding be used “in ways which encourage consumers to widen their experience of cultural activities and which promote freedom of entry into the ‘culture market’ so that cultural innovators can challenge well-established institutions” (Peacock, 1991: 11). In other words, invest public money at the point of consumption as well as production, in the hope of stimulating demand and letting the market mechanism replace bureaucratic choice. This is not likely to enamour the public broadcasters – but it could have a salutary effect on public broadcasting.

9. The UK still provides in many respects the most stimulating model of this type, in the system’s adaptiveness to new public service needs, a comprehensive funding formula, evident public support, and resistance to the domineering tendencies of various government agendas, be they economic or political.

10. There is deliberately both a value judgement and an element of prognosis in our characterization of these systems as residual.

11. The perils of such systems of classification become evident, however, as soon as one studies specific cases. India is an example which defies simple classification because of the particular historical role of the national broadcaster Doordarshan. Some might wish to debate whether India’s should be considered a public service or a state broadcasting core system and if the latter, whether it should be considered ‘emerging’ or ‘residual’. For that matter, there is often a fine line between public service and state broadcasting in every country, particularly in time of political crisis, and it could be argued that the ultimate legal authority of the state over broadcasting extends to the private enterprise core systems as well. Suffice it to say that a typology may be useful for general analytical purposes, but detailed examination of cases is bound to be more revealing.

12. See Kleinwachter (1995). Kleinwachter describes an ideal “participatory model” which Central and East European media activists sought to implement in the period immediately following the events of 1989. Such a

model would have combined US First Amendment freedom of expression rights; the British concept of broadcasting as public service; Germany's constitutional legal guarantees of broadcasting freedom; France's protection of national culture and language; international notions of the right to communicate; Dutch pluralism; Scandinavian approaches to local broadcasting and state subsidies without government control; and Luxembourgian economic liberalism. The evolution of broadcasting in these countries has taken a less idealistic path, however, which Kleinwachter breaks into four stages: (1) awakening to the new media freedoms; (2) disillusionment; (3) political struggles over control of media, especially national television; and finally, the present stage, (4) the building of new institutions, public and private, based on law, independent of government control, competing under market conditions, and seeking to integrate into translational European broadcasting frameworks and structures. Varying from one country to the next, the basic thrust is the replacement of monopolistic state-owned, party-controlled systems with independent ones but, in general, "... the new broadcasting systems in the former East bloc, confronted with the realities of daily life, now have the choice between domestic governmental control and foreign commercial control" (Kleinwachter, 1995: 44).

13. In Europe, it is also possible to identify an international (or regional in global terms) broadcasting system, to the extent that the European Union seeks to influence broadcasting development, but broadcasting is still legally constituted and regulated nationally by each member state, albeit with respect to Union regulations (see Venturelli, 1994).

14. See the German Constitutional Court decision of February 1994, ruling that the funding of public broadcasting should be constitutionally guaranteed and insulated from the variable humour of political decision-making. The Court bases its argument for enshrining the financial independence of public service broadcasting in law on the position that private broadcasting alone can not fulfil the public service mission of broadcasting (Eberle, 1994).

15. See Syvertsen (1992). In Scandinavia particularly, the broadcasting debate is tied to the general critique of the welfare state bureaucracy. See Hultén, 1992; Prehn and Jensen, 1993; Sepstrup, 1993.

16. Regarding this 'second channel' model, see Chaniac and Jézéquel (1993). Generally, the legitimating logic of this type of channel is audience reach rather than share. The issue of mainstream generalist versus specialized 'cultural' programming is of considerable polemical debate among advocates of public service broadcasting in some countries; see for example, the exchange between Dominique Wolton (1992b) and Jérôme Clément (1992) in *Le Monde* on the occasion of the launching of ARTE.

17. Interestingly, one finds in this category examples of national, international, and global broadcasting services. While the definition of national service is obvious enough, we can consider an 'international' service to be one based on participation by at least two countries, and a 'global' service as a broadcast undertaking emanating from a single centre and aimed at a world-wide audience.