Media policy for small emerging democracies : distinctiveness, vulnerabilities, and development

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**MEDIA POLICY FOR SMALL EMERGING
DEMOCRACIES: DISTINCTIVENESS,
VULNERABILITIES, AND DEVELOPMENT**

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**WEE KIM WEE SCHOOL OF COMMUNICATION AND
INFORMATION**

2018

**Media Policy for Small Emerging Democracies:
Distinctiveness, Vulnerabilities, and Development**

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LEGISLATION

BHUTAN

Bhutan Telecommunications Act (1999)

Bhutan National Radio Regulations (1999)

Bhutan Information, Communications and Media Act (2006)

Constitution of the Kingdom of Bhutan (2008)

National Radio Rules (2011)

Bhutan Telecommunications and Broadband Policy (2013)

Right to Information Bill (2014)

Social Media Policy of the Royal Government of Bhutan (2015)

TIMOR-LESTE

Constitution of the Democratic Republic of Timor-Leste (2002)

Media Act of Timor-Leste (2014)

SLOVENIA

Constitution of the Republic of Slovenia (1991)

Mass Media Act (1994)

Mass Media Act (2001)

Digital Broadcasting Act (2007)

Law on Audiovisual Media Services (2011)

MACEDONIA

Constitution of the Republic of Macedonia (1991)

Broadcasting law (1997)

Law on Electronic Communications (2005)

Civil Defamation Law (2012)

Law on Media (2013)

Law on Audio and Audio-Visual Media Services (2013)

Amendments of the Law on Media (2014)

Law on Electronic Communications (2014)

ABSTRACT

Media would be expected to play a functional role. Crucial to proper functioning of communication media, independence is determined by several factors. How media are financed may determine whether they may or may not avoid interference. However, media in small emerging democracies face multiple obstacles caused by “smallness” and the state of “late democratization.” “Smallness” raises the question of how to develop financial independence in these countries. “Late democratization” gives rise to the challenge of maintaining political independence. In general, small emerging democracies lack an environment that can enable a culture of independent media.

This study selected two Eastern European countries—Slovenia and Macedonia, with a population of about 2 million each, and two Asian countries—Bhutan and Timor-Leste, with populations of around 740,000 and 1.2 million respectively. They all emerged in the “Third Wave” of democratization and were characterized by features of underdeveloped political institutions, insufficient public discourse, and financial vulnerability according to the previous scholarly work (Kennedy, 2009; O’Donnell, 1999).

Based on literature review, the researcher found that smallness, along with confounding factors of national identity and economic context, shapes the way media policy is envisioned and developed. Three research questions were posited to study how cultural context and media economics shape media policy in small emerging democracies. The ultimate objective is to provide a

conceptual framework to guide the study and development of media policy in countries with similar concerns.

Using a mixed methodology of interview and documentary research, the researcher found that the reaction of small emerging democracies to the sudden social and political changes tended to have patterns, although they differed in the paths to democratization. Furthermore, the role of media as a watchdog is undermined by the financial dependence on the government of the day. With respect to media governance, the four countries are all marked by the hierarchical mode of governing. This casts light on the fact that media policy should be constructed with input from private sectors and civil societies. A conceptual framework provided by this study can work as an analytical tool for researchers who are interested in studying similar-sized countries. Therefore, researchers could take a cautious step in drawing experiences and models from other countries and ultimately ensure that media may perform their functional role in a particular context.

CHAPTER ONE INTRODUCTION

One critical function of media is to play the role of watchdog. To maintain a meaningful bark, a precondition of this role is to keep a distance from the entity the watchdog is keeping an eye on. In practice, autonomy for a media watchdog requires financial and political independence.

Crucial to functioning of media, independence is determined by several factors. How media are financed may determine whether they may or may not avoid interference. Most media are financed through diverse sources, including advertisers, consumers, public or private foundations and charities, private investors, and the government (McQuail, 2010). That media ownership may ultimately decide the nature of media is recognized as the “second law of journalism” (Altschull, 1984). If the major source of finance comes from the government, for example, government leaders and functionaries will be tempted to exercise power over the media and consequently intervene in media independence.

Models of Media and Political Systems

The most current models of the relationship between media and political systems come from Hallin and Mancini (2004), who developed three models based on a study of 18 developed capitalist countries in North America and Western Europe. The three models are the Liberal Model, the Democratic Model, and the Polarized Pluralist Model (Hallin & Mancini, 2004). The Liberal Model derives from Britain and United States and is marked by the weak role of the state in media, high professionalization, and low press-politics

parallelism. The Democratic Model, seen in European countries, is characterized by a strong role for the state in media, high professionalization, and high press-politics parallelism. The Polarized Pluralist Model is marked by high political parallelism and strong state intervention, in countries where this model applies, an independent role for media is questionable.

Hallin and Mancini (2004) did not explore cases in emerging democracies. When *Comparing Media Systems* (Hallin & Mancini, 2004) came out, many scholars discussed how the three models could apply to the rest of the world. Hallin and Mancini (2012) began to enlarge the range of cases by inviting scholars who studied media systems outside Western Europe and North America to ensure that a wider range of countries have been represented. By following the conceptual framework of *Comparing Media Systems* (Hallin & Mancini, 2004), scholars from 12 different contexts reflected upon the applicability of the three models for their own media systems. The reflection from scholars addressed different difficulties in applying three models to countries. Factors of cultural tradition, historical context, political changes, and national security were taken as perspectives to analyze the applicability of the three models. Some (Jakubovicz, 2007) concluded that the Polarized Pluralist Model could be used to describe countries categorized by late democratization, having found that these countries are characterized by a weak rational legal authority and tumultuous political life. However, no formal model has been developed for emerging democracies.

On first impression, one would think that media in emerging democracies are more inclined to reflect rather than to challenge a government's policy, since they lack supporting institutions to keep political

independence. There are seven components of democracy, adopted by the United Nations General Assembly (Meyer-Resende, 2011). Emerging democracies are those where these seven elements are not fully formed. Supporting institutions, especially an independent judiciary and a pluralistic system of political parties and organizations, are not yet well established in emerging democracies. The seven elements of democracy will be elaborated upon later in this Chapter. Because of emerging democracies' late development and fragility, they will not be similar with the European democracies in 19th century, which achieved components of democracy in gradual historical progression (Schmitter & Karl, 1991). Schmitter and Karl (1991) also commented that new democracies must live in "compressed time." On the one hand, they have developed some characteristics of democracy, but not at a full scale; on the other hand, they cannot expect to acquire all or most of the components as did their predecessors in such a short period.

Because they often splinter from larger entities, these emerging democracies tend to be small in population. Just as it is challenging to maintain political independence, it is also challenging to be financially independent in a small media market. Because of late democratization and the constraints on realizing economies of scales in a small sovereignty, the lack of an environment that can enable a culture of independent media leads to difficulties. In other words, media in small emerging democracies face the twin challenges of maintaining political independence because they operate in an emerging democracy where supporting institutions are not fully formed and of developing financially independence because of their small market. The problem of how to ensure that the media function in small and emerging democracies, where

financial and political independence is challenging, is the starting point of this thesis.

As mentioned above, the Polarized Pluralist Model is a type of media system marked by strong political intervention. The term “media system” comprises a set of mass media in a given society and the structure that links elements. Media system, in the context of studying it, is a term that mainly refers to traditional media, which do not include the Internet. The rules and regulations are basically targeted at traditional media. Media policy, as identified by Des Freedman (2008, p. 14), is “the development of goals and norms leading to the creation of instruments that are designed to shape the structure and behavior of media systems.” It consists of a body of laws and regulations that ensure rights and freedoms as well as obligations and limits (McQuail, 2010). Technically, a media system derives from the goals and arrangement of media policy principles. In this sense, media policies must be devised to ensure that function and operation according to norms and values within the context. Media in a small country in early years of democratization may encounter obstacles in the way of independence from two factors. One is the lack of the enabling environment for the creation of a culture of independent media. This is substantially determined by the transition context of this country. The other factor is the small size that contributes to the difficulty if not impossibility of financial independence: the smaller the media market, the lower the media industries’ revenue. High first-copy costs characterize this industry, so that, all other things being equal, a media market that is twice the size of another is more than twice as profitable as the other (Picard, 2011). Thus, it is necessary to look at media policy in countries characterized by

“smallness” and “new democracy,” since these two factors may influence the independent role of media.

For years, it has been taken for granted that experiences of big countries are worth modeling (Lowe & Nissen, 2011). It just seems commonsensical that recently developing countries will follow the footsteps of countries that are more developed. Yet the transplantation of media policy from developed countries is unlikely to suit a context where media structures are completely different. As explained above, media policy determines how to design goals and norms leading to instruments that are able to organize the media system. The Polarized Pluralist Model, based on the study of France, Greece, Italy, Portugal and Spain, reflects a strong role of the state and high presence of press-politics parallelism. Unfortunately, the Polarized Pluralist Model cannot cover features of small emerging democracies exhaustively, since most of representative countries are mature democracies whose scenario differs from smaller, newer states. Behind the scenes of media systems, rules and principles of media policy are in play.

Research Goals

This thesis questions the assumption that a unitary framework of media policy can be applied or adapted to all countries. It argues that to ensure the media function in a democracy, certain features of media policy must be adapted to suit the small media market in an emerging democracy. The characteristics of small countries in general must be taken into account when devising media policy, because small countries share peculiarities in their media markets (Meier & Trappel, 1992; Trappel, 1991). Despite some academic interest in

such countries as early as the 1990s (Trappel, 1991), to date the systematic research has neglected the distinctiveness of these countries.

In the present research, the researcher will use the term “small emerging democracies” as a category to identify and study small countries whose governments are moving toward democracy. How this category was constructed will be elaborated upon in the sections that follow.

The role of media is essential in determining when, how, and to what extent democratization takes shape in the transition, even if media did not cause the former regimes to break down (Gunther & Mughan, 2000). Ultimately, media policy should enable media to be independent in order to enable their proper functioning. The relationship between media and democracies is never unidirectional. This study focuses on media policy in small emerging democracies. First, key terms used in the dissertation will be defined, followed by criteria for choosing countries for study.

Defining Key Terms

Smallness

In this study, “smallness” functions as the restrictive precondition in which media operate. Smallness, as a characteristic feature of a country, determines a country’s freedom to maneuver (Meier & Trappel, 1992). In a similar vein, media enterprises in such small markets cannot be financially and politically independent.

Most studies of media systems have been on those of large countries. The United States, with the population of 318.9 million, is much larger than most countries, but it receives most attention from scholars and is used as the

model in this field. In fact, they are not the most common case in the world. Representatives of large countries, such as the United States and Canada, are categorized as the Liberal Model. They are characterized by the weak role of the state in media, high professionalization, and low press-politics parallelism.

Scholars have used different parameters to measure the size of a country depending on the subjects and purposes of their studies (Chowdhury, 2012; Thorhallsson & Wivel, 2006; Vital, 1971). Population size and Gross National Product (GNP) are regarded as “hard” facts in defining “smallness,” yet these characteristics alone do not identify “smallness” across disciplines. For the purpose of this study, the most important criterion in defining “smallness” is the small media market size resulting from the country’s population. In media policy study, Trappel (1991) employed three characteristics of “smallness” in Western Europe: the limits of media size, the dependence of the media market, and democratic corporatism. However, these features fail to accurately reflect small countries in the context of emerging democracies, because such countries differ from Western European countries in terms of economic conditions and social structure.

Puppis and d’Haenens (2009), guest-editing a special issue of the *International Communications Gazette* focusing on small-states communication studies, argued that structural peculiarities of small states affect media regulation. However, the relation between smallness and media regulation remains unclear (Hallin, 2009) and as does the notion of “small states.”

To select appropriate countries for study, two criteria were specified: population size and economic conditions. Population size has significance for media because of its direct relationship with a mass market (Picard & Wildman,

2015). Another parameter is the economic conditions prevailing in the country, which largely determine the viability and sustainability of media.

Population Size

Implications and significance of population size vary among subjects that have been studied. In the literature of international relations, population size is widely used as an indicator for analyzing and predicting countries' behavior in the international system (Chowdhury, 2012; Thorhallsson & Wivel, 2006; Vital, 1969). With regard to media policy, some scholars have challenged the notion that population is a useful variable (Hallin, 2009), but most agreed that population is a relevant variable in defining smallness because it relates to the size of the media market (Puppis, d'Haenens, Steinmaurer & Künzler, 2009). Most importantly, population size determines the resource constraints, survival, and profitability of media industries (Charles, 1997).

What is the number that divides between small and not-small?

American political economist and statistician Simon Kuznets (1960) argued that countries with a population below 10 million should be identified as small states; agricultural economist Demas (1967) said that a country with a population of five million or less is a small country. The criterion used by Puppis and d'Haenens (2009) in the Editorial of the *International Communication Gazette* is less than 15 million inhabitants. As selected by the Commonwealth (2016), a coalition of 53 countries ranging in size from Canada to island nations, small states are countries with a population of 1.5 million or fewer. The editors of *Small Among Giants* (Lowe & Nissen, 2011) chose 20 million as their dividing line because they believed this would “achieve critical

mass in TV as a medium.” Thus no universal criterion or definition of “small countries” exists.

The critical factor in the definition of “smallness” in this study is independence. So what is the “tipping point” at which countries above that population size have a financially viable media system and those below that number do not? Taking Singapore as a case, the newspaper industry is viable but more or less as a monopoly; the television industries struggle (Kuo & Ang, 2000). Singapore has a population of about 5 million. Interestingly, the 5 million figure divides the world ranked by population into roughly two halves. Of the roughly 200 countries, Norway with a population of just a shade above 5 million ranks 121; Singapore ranks 114 (U.S. Central Intelligence Agency, 2015c). And indeed, Norway’s media system receives subsidy from the government (George, 2008). In this sense, countries with the population around 5 million technically survive financially especially within the context of small wealthy countries. The extent to which small population becomes an issue in supporting media’s viability, profitability, and independence should be considered with the economic conditions and maturity of social development.

The largest country by population in this study is Macedonia, with a population of about 2.1 million followed by Slovenia with 2.07 million. Timor-Leste has a population of 1.3 million and ranks 159; Bhutan has 0.79 million and is ranked 165 in population size (U.S. Central Intelligence Agency, 2015a).

Economic Conditions

The hypothesis that country size is important for devising media policy in European countries is not completely supported by findings reported by Lowe

and Nissen in *Small Among Giants* (2011). Critical factors such as a country's economic wealth and political culture should also be considered when identifying small countries. A country's economic conditions decide factors such as advertising revenue, the variety of programming, and the diversity of media products (Lowe & Nissen, 2011). The present study therefore focuses on those countries where media industries struggle to survive.

Summary

The concept of a small state is not determined by some absolute measurement but by a state's position in a certain context or issue area (Thorhallsson & Wivel, 2006). The definition will vary according to the context in which it is utilized. For this study's purpose of investigating the media policy in emerging democracies, developing countries with population of about 2 million or fewer are recognized as small countries.

Emerging Democracies

By definition, democracy means "a system of government by the whole population or all the eligible members of a state, typically through elected representatives" (Oxford University Press, 2015). Schmitter and Karl (1991) defined democracy by using 11 components in *What Democracy Is...And Is Not*. A matrix of potential combinations is developed to produce different democracies. In 2004, The United Nations General Assembly adopted a resolution in aiming to promoting and consolidating democracy by outlining seven "essential elements" of democracy (Meyer-Resende, 2011). Endorsed by 172 states, the resolution represents a consensus on the definition and function of "democracy." The seven essential elements are as follows:

- Separation and balance of power;
- Independence of the judiciary;
- A pluralistic system of political parties and organizations;
- Respect for the rule of law;
- Accountability and transparency;
- Free, independent, and pluralistic media; and
- Respect for human and political rights.

Components of democracy are addressed from two distinct aspects: vertical and horizontal accountability. The former denotes the relation between a state and its people, which has been recognized as the prerequisite for a democracy; while the latter relates to how state institutions interact. Although components are indispensable to democracy's presence, these are insufficient for a democracy to exist. Specific procedures must be followed to make a democracy possible (Schmitter & Karl, 1991). Robert Dahl (1971) offered the theory of polyarchal democracy and termed the "procedural minimal": the procedures assert an element of accountability and control over government decisions and entitle citizens to rights. There are seven conditions of the procedures that must be present for democracy, which he replaces with "polyarchy", to thrive.

The media play an essential role in this mix of procedures and conditions in a democracy by creating an open society and a transparent system of government, as well as by safeguarding fundamental human rights (Meyer-Resende, 2011). Media help to establish democracy, not only in causing or triggering the regime transition that occurred at the beginning of a democracy

(or at the end of an authoritarian regime), but also by participating in the process of consolidating the democracy. After the transition to democracy is set in motion, the role of media remains significant; for example, in familiarizing the public with new parties, agendas and policies (Gunther & Mughan, 2000).

The existing literature provides no conclusive description on the relationship between democracy and development, despite some academic attempts to conceiving “democracy” in degrees (Kennedy, 2009). In Latin America, many countries that became political democracies continued under authoritarian rule and some later failed to satisfy the conditions of democracy. They presented a combination of the coexistence of political freedom with weak horizontal accountability (O’Donnell, 1999). Optimally, the ideal model of democracy is fully functional, but no nation can acquire all the desired elements.

In summary, democracy is achieved through a process rather than as a result. In all the countries surveyed, it was clear that the regulators had, at least initially, hoped for regulations that would enhance their fledgling democracy.

There is no official definition of “emerging democracies” as their situations are complex and may vary from country to country. Emerging democracies in the current study refer to countries at the incipient stage of democratization, in which they may not necessarily fully obtain all the UN-defined essential elements. Emerging democracies were defined by time (in the “Third Wave” of democratization) and characterized by features of underdeveloped political institutions, insufficient public discourse, and financial vulnerability according to the previous scholarly work (Kennedy, 2009; O’Donnell, 1999). Former President of Ghana Jerry John Rawlings

(2013) defined emerging democracies as countries that “have emanated a perceived legitimate democratic electoral process but are still saddled with complexities of dominant political parties and poorly applied rule of law.” It indicates that features of emerging democracies comprise vulnerability, unsettlement of political institutions, and room for improvement. Vulnerability mainly refers to economic, cultural, and sovereign vulnerability. Media that are financially vulnerable will have difficulty being independent. And the turmoil in political institutions means that it will be difficult to avoid political interference.

In the “Third Wave” of democratization that began in 1974, many small countries became democracies, at least in form. This democratic transition occurred across Latin America, Eastern Europe, East Asia and Africa (Voltmer, 2013). Some scholars suggested that the “Arab Spring” was the “Fourth Wave” (Howard & Hussain, 2013).

Figure 1.1 Percentage of Electoral Democracies in the World (Puddington, 2014)

As Figure 1.1 shows, the percentage of electoral democracies as a proportion of the total number of countries in the world increased sharply

between 1973 and 1993. According to Freedom House, 41% of countries were electoral democracies in 1989; 24 years later, in 2013, the proportion was 63%.

Choice of Countries for Study

Background

The researcher was fortunate to witness the dramatic social changes and the process of rectifying media policy in Bhutan in June 2012. Four years earlier, Bhutan deliberately transformed its government from a monarchy to a democracy. By 2012, Bhutan was facing diverse challenges in economic development and political consolidation, compounded by “cultural threats” from its bigger neighboring countries, China to the north and India to the south. Media played a crucial role in ensuring the vibrancy of this new democracy. However, media organizations found it difficult to survive financially and to remain independent, given a small media market. The conundrum is that media are trapped by constraints of small size just as society foists its high expectations upon them.

At its advent as a democracy, Bhutan intentionally promulgated various laws and policies to ensure that the media, information, and communication would adopt global best practices to help guide the country’s development into a democracy. The incipient stage of development in media legislation allows more room to improvement. Thus, they are more open to suggestions and recommendations. However, the implementation of media policy did not succeed when it was translated in the context of Bhutan. My interest in small emerging democracies emerged from the concerns of countries such as Bhutan.

Choices of Countries

Emerging democracies, defined as having established the legitimate democratic electoral process but are still struggling with poorly applied rule of law. To limit the research to a manageable size, selection was limited to countries that became independent between 1989 and 2013. In addition, the incipient regimes are characterized by “horizontal inequalities,” and a contested political settlement and politicized civil service (Menocal, 2013). Based on the specified criteria of “smallness” and “emerging democracies,” a set of guidelines were established for this study:

- 1) Small developing countries with the population of around 2 million or fewer;
- 2) In Asia, Bhutan and Timor-Leste were selected because they are newest democracies;
- 3) In Europe, the researcher looked to find a counterpart to make comparison with Bhutan and Timor-Leste. There was a thesis on Macedonia and Slovenia. The thesis titled *Small and Resistant: Europeanization in Media Governance in Slovenia and Macedonia* (Broughton-Micova, 2013) exploring the reality resulted from Europeanization provide the researcher the context of doing research so that the researcher had previous study to build upon;
- 4) The selected countries are faced with concerns on media’s financially sustainability and independence, and desiring to reform their media policy.

These criteria and interest of research led to the choices of Slovenia and Macedonia from Eastern Europe and Bhutan and Timor-Leste from Asia (Table

1.1). They stand at a transformative stage where dramatic social and political changes have taken and continue to take place. In addition, they encounter shared concerns of improving media policy. They are in common in terms of small size, countries at the incipient stage of democratization, characterized by features of underdeveloped political institutions, insufficient public discourse, and financial vulnerability according to the previous scholarly work (Kennedy, 2009; O'Donnell, 1999). They differ in historical background, cultural context, and the path to democracy, which will be elaborated in the later section.

Table 1.1

Four Small Emerging Democracies Selected for Case Study (U.S. Central Intelligence Agency, 2015a, 2015b, 2015c, 2015d)

Country	Year of Independence	Location	Area (sq km)	Population (2016)	Press Freedom Ranking (2017)
Slovenia	1991	Southern Central Europe	20,273	2.0648 million	37
Macedonia	1991	Central Balkan peninsula in Southeast Europe	25,713	2.0812 million	111
Timor-Leste	2002	Maritime Southeast Asia	15,410	1.2687 million	98
Bhutan	2008	South Asia	38,394	797,765	84

Slovenia and Macedonia were selected as subjects not only because of their similar geographical size (Table 1.1), but because they both had been part of the former Yugoslavia. They are located in Europe, but few publications

addressed issues in media and media policymaking in central and southeast Europe previously. The thesis titled *Small and Resistant: Europeanization in Media Governance in Slovenia and Macedonia* (Broughton-Micova, 2013) exploring the reality resulted from Europeanization, was one of a few publications focusing on influences brought by international and regional organizations. They are in common in terms of small size, countries at the incipient stage of democratization, characterized by features of underdeveloped political institutions, insufficient public discourse, and financial vulnerability according to the previous scholarly work (Kennedy, 2009; O'Donnell, 1999). They differ in historical background, cultural context, and the path to democracy.

The researcher was attracted by the fact that media development in the two countries was deeply linked with political power (Zei, 2004), but the two countries' paths to democratization differed. Slovenia, already the most prosperous of the Yugoslav republics, proceeded peacefully to pluralist rule and became a stable democracy; Macedonia transited at a slower pace with bloody revolutions (Gunther & Mughan, 2000). This was reflected in the fact that political elites were reluctant to relinquish control over media systems. Instead, they attempted to maintain the old order, wielding their power to influence and limit media independence (Broughton-Micova, 2014). In this sense, they are both marked by the lack of an independent role of media. They are also similar in not revising Western practices, characterized by liberalization and de-monopolization, when they ought to devise a new model based on their own reality (Broughton-Micova, 2014).

Timor-Leste experienced a long history of Portuguese colonization and Indonesian occupation. It was the first country to become independent in the 21st century. Bhutan is the newest democracy among the four, with the smallest population but largest geographic area. It was a monarchy until its fourth king stepped down the throne and turned it into a democracy in 2008.

Thesis Chapters

The thesis consists of seven chapters. Chapter 2 introduces three models of media systems and then extensively reviews previous study on media policy in small states. Relevant literature on media policy in emerging democracies is also discussed. Research questions and hypotheses are raised based on the literature review and research objectives. Chapter 3 presents the process of research design and methodology followed by the process of data collection. Chapters 4, 5, and 6 focus on key media-related issues on the national context and on media economics of small emerging democracies, and provide legislative solutions at last. Chapter 7 summarizes the major findings of this study and the implications for new frameworks for studying media policy in small emerging democracies, and acknowledges the limitations of this study.

CHAPTER TWO LITERATURE REVIEW

Introduction

Communication studies as a new discipline developed in the 20th century, driven mainly by rapid changes in technology and interest in the relationship between democracy and communication. During World War II, some studies investigated the use of propaganda, but communication studies research took off in earnest after the war (Rogers, 1994). It was a time of optimism of the possibility that media could help developing nations throw off their yokes of colonialism. Perhaps the most prominent of these studies was Daniel Lerner's (1958) *The Passing of Traditional Society*, which gave communication a central role in a country's development.

In hindsight, the optimism was set in a context of the Cold War, with the USA and Western Europe on one side and China and the Soviet Union on the other: capitalism and democracy on one side, and communism and socialism on the other. It was in this historical context that Siebert et al.'s (1956) *Four Theories of the Press* was published. Viewed retrospectively, the book appears not so much as to have captured theory as a slice of history—while political systems determined media systems, there were only four broad models. And so the four-model theory remained for half a century. As the Cold War ended, however, it was apparent that the approach needed reconceptualising. Responding to increasingly sophisticated data and developing communications research, Hallin and Mancini's seminal work *Comparing Media Systems* (2004) extracted three fundamental models of media systems to describe the

relationship between media systems and democratic political systems in the Western context.

Today, we understand that a significant problem of the authoritarian model is that because the government can intervene in the name of national development there is no self-correcting mechanism to ensure that the press can report accurately, objectively, and fairly. In contrast, American and Western European media policy aims for a press free from both government and business intervention; the approach is categorized as the Liberal Model by Hallin and Mancini (2004), marked by low state intervention and high professionalization. In brief, the press must be politically independent and financially self-sustaining (Coyne, 2009). While the Hallin and Mancini's (2004) approach improves on Siebert's (1956), one is left wondering if even their conception of media policy is set in a slice of time.

To be politically independent and financially self-sustaining, media industries must be situated in countries that are large enough to enable them to be politically and financially viable. This does mean a democracy of a certain size. Because media have high first-copy cost, media industries in small markets tend to struggle financially, more so than their counterparts with larger markets. And indeed, on reflection, the countries where communication studies and media theory were developed tend to be sizeable in terms of their media markets. Political independence and financial sustainability could also be affected by the lack of essential components of democracy (Meyer-Resende, 2011), including fully formed institutions, separation and balance of power, and independence of judiciary.

Thus, one would expect that smaller economies, particularly those of emerging democracies, would find it a challenge to apply the current theory of media policy to their context. This insight becomes evident in a review of the media policy of Bhutan, a country with a population of 750,000 and an adult literacy rate of around 52.8% (Ministry of Information and Communications, 2013). It is served by 12 newspapers, most of which are concentrated in the capital.

This chapter reviews the peculiarities of this and similar small media markets. It reviews the relationship between the media and the state, then compares media systems in the context of emerging democracies and analyzes the role of media in the process of democratic transformation across regions. Besides investigating the relationship between the media and “emerging democracies,” the study also reviews the impact of “smallness” on media markets. It is worth noting that previous studies on media policy in small states focused mostly on European countries, without looking at a transitional context.

The Relationship between the Media and the State

The relationship between the media and the state varies by the type of governmental regime, depending on the nature of the state, its political systems, social values, and economic conditions. It also depends on the development stage of the particular state. Today, this relationship is mostly discussed in the context of democracy. Throughout the 20th century, media were brought to the center as they became the major source of political information to mass public and shaped the way citizens structure their attitudes towards politics (Gunther & Mughan, 2000a). This role of media is seen as the “connective tissue” of a

democracy. As reported by Mughan and Gunther (2000), the biggest contrast in the roles of the media is rooted in the democratic and nondemocratic political systems.

In nondemocratic regimes, whether authoritarian or totalitarian, political elites assert control over the media; they understand how to clothe information with an objective outer form (Neuman, 1991). Media in such regimes are characterized by strict censorship, selective information dissemination to the public, and repression of journalistic liberty.

In contrast, two characteristics of democratic media systems guarantee that information will serve the public more fairly and equitably: constitutional guarantees to ensure the free access to political information, and the absence of arbitrary exercise of political power over the media (Mughan & Gunther, 2000).

In practice, the relationship between regimes and the media is more complicated and diverse than the theorized models suggest. Media in democracies are not fully free from government intervention, as might be expected, while media in nondemocratic regimes are not necessarily always suppressed. Mixed features are commonly seen in both democracies and nondemocratic regimes. Thus there is no clean-cut “dichotomy.” Even in mature democracies in North America and Western Europe, the relationship between the media and the state varies among different countries. This is evident in the three models of media systems distilled by Hallin and Mancini (2004). The three models were developed from the study of 18 developed capitalist countries and classified by distinctive characteristics into four dimensions: structure of media market, political parallelism, professionalization, and the role of the state in the media system. The

relationship between the media and the state is reflected in the three models with different characteristics shown in Table 2.1.

Table 2.1

The Three Models: Media System Characteristics (Hallin & Mancini, 2004, p. 67)

	Polarized Pluralist Model	Democratic Corporatist Model	Liberal Model
	France, Greece, Italy, Portugal, Spain	Austria, Belgium, Denmark, Finland, Germany, Netherlands, Norway, Sweden, Switzerland	Britain, United States, Canada, Ireland
Structure of Media Market	Low newspaper circulation;	High newspaper circulation;	Medium newspaper circulation;
	Elite politically oriented press	Early development of mass-circulation press	Early development of mass-circulation commercial press
Political Parallelism	High political parallelism; External pluralism;	External pluralism;	Internal pluralism;
	Commentary-oriented journalism;	Historically strong party press; shift toward neutral commercial press;	Information-oriented journalism; Neutral commercial press;
	Parliamentary or government model of broadcast governance-politics-over-broadcasting systems.	Politics-in-broadcasting system with substantial autonomy.	Professional model of broadcast governance-formally autonomous system.
Professionalization	Weaker professionalization; Instrumentalization.	Strong professionalization; Institutionalized self-regulation.	Strong professionalization; Non-institutionalized self-regulation.
Role of the State in Media System	Strong state intervention;	Strong state intervention but with protection for press freedom;	Market dominated (except strong public broadcasting in Britain & Ireland)
	“Savage deregulation”	Press subsidies Strong public-service broadcasting	

With market-dominant media, the state’s role in the Liberal Model is “limited government.” This model describes the media system in Britain,

United States, Canada, and Ireland and is characterized by medium-circulation press, information-oriented journalism with internal pluralism, strong professionalism, and market-dominated media. The “media logic” in the Liberal Model follows the rule of a market economy and professionalism rather than a “political logic” focusing on the needs of political elites and governments. In the Liberal Model, disconnectedness from the political sphere is an improvement for media because it makes them structurally and financially independent. On the other hand, commercialization integrates the media into the economic sphere. The more the media are integrated into the economic sphere, the more they rely on the commercialization, which can be harmful ultimately, too (Curran, 2011; Hallin & Mancini, 2004).

Hallin and Mancini’s categorization of the four countries has been criticized by Curran (2011) who pointed out the limitations of excluding salient features of the American media system and political context. He noted that the model overlooks the facts that U.S. politics is driven by money, that America is an imperial power, and that its society is unequal. In the United States, money-driven politics is typified by national politicians, either Republican or Democrat, who are beholden to the wealthy and powerful for funding and influence to run successful election campaigns (Curran, 2011, p. 40). Unlike the other three countries, which apply some restriction on political advertising, America imposes no limit on the amount of television political advertising expenditure (Curran, 2011, p. 42). America has become globally influential by exporting its culture and values. American media have supported American invasions of other countries, about which media coverage rarely provides critical perspective. In addition, American society is marked by low social

spending and limited redistribution, making it a *market democracy*. This is different from the *welfare democracy* in Britain, Ireland, and Canada (Curran, 2011, p. 37). In sum, Curran (2011) argued that Hallin and Mancini's models (2004) failed to capture critical features of American political system.

In the second model, the Democratic Model, the state has a more active interventionist role. Represented by European countries, this model is characterized by a high-circulation press, external pluralism, strong professional associations, and a well-established professional culture, and strong public service broadcasting. As welfare democracies, these states are expected to accomplish various collective goals related to political parallelism and the improvement of democratic life (Hallin & Mancini, 2004). The state and the media work more closely by the way of supporting press freedom than is seen in the Liberal Model. Nevertheless, Britain and Ireland, placed in the Liberal Model, have strong public broadcasting, which is characteristic of the Democratic Model. This suggests the blurring of the boundaries between the two models in some facets of media. The distinction between the Liberal Model and the Democratic Model replicates some of the differences between liberal democracies and welfare state democracies (Hallin & Mancini, 2004).

The representative countries under the Polarized Pluralist Model are relatively younger "emerging democracies," with the exception of France. This model is characterized by a low-circulation press directed mainly to the elites, high political parallelism, a weaker professional culture, and strong state intervention. The Polarized Pluralist Model has become a catch-all category in classifying media systems that emerged in the "third wave" of democratization (Veltmer, 2012). In this sense, most countries outside of Western democracies

will fall into this category. This model, however, simplifies the diverse patterns within emerging democracies and thereby undermines the significance of the three models as analytical tools in examining media systems in countries outside Western democracies. As a consequence, the characteristics of media systems in emerging democracies are not captured and conceptualized. Thus, Voltmer (2012) suggested that one must “break down the broad category of hybrid media systems with the aim of identifying specific constellations that might constitute distinct models of media systems other than the three suggested by Hallin and Mancini (2004).” For the study of countries outside the Western world, further categorization of media systems is necessary. If one wants to study emerging democracies that could not be found in any particular geographical areas where breed three models, the categories of three models must be refined and expanded.

Three Models of Media Systems and Emerging Democracies

Hallin and Mancini (2012) have said that the three models were not intended to become a universalizing approach used without any adaption. With regard to the “third wave” of democratization (Huntington, 1991), Voltmer (2012) raised the question of how far media systems can travel. If one were to categorize emerging democracies into one model within Hallin and Mancini’s typology, one might find that the Polarized Pluralist Model seems most suitable as the model captures features such as low newspaper circulation and high political parallelism of emerging democracies (Jakubovicz, 2007). However, this catch-all category cannot describe all emerging democracies accurately based on four dimensions distilled from the context of well-established democracies.

New democracies did not follow the same transformation pattern in their development but varied according to the political and cultural traditions. Political science transition research distinguished three pathways of democratization: communist oligarchy in Eastern Europe, military dictatorship in Latin America, and one-party dictatorship in Asia and Africa (Hollifield & Jillson, 2000; Whitehead, 2002). Four dimensions used by Hallin and Mancini (2004) as the foundation in comparing media systems are: patterns of the structure of media market, political parallelism, professionalization, and state-media relationship. Voltmer (2012) concluded that categorizing new democracies into one of the existing models leads to conceptual overstretching, because emerging democracies encompass the mixed elements of the past regime and the new regime. The relationship between the media and political, economic, and cultural environment in such countries indicates that emerging democracies should develop unique types of media systems based on their broad variations (Voltmer, 2008, 2013). Four dimensions used in classifying different types of media systems in mature democracies may not best capture features of new democracies (Voltmer, 2012).

The ideological distinction of left and right, a distinction that arguably makes sense in Europe, is inadequate to explain the relationship between the media and the political environment in emerging democracies where regional identities, religions, ethnic, clientelistic loyalties, economic conditions, and political tradition are more important to media systems (Voltmer, 2012). In this case, the relationship between the media and politics could be described as “liberal ideals of a free press with the trajectories of the past, indigenous values, and the constraints and experiences of transition” (Voltmer, 2008).

Some scholars believe the ultimate goal for emerging democracies is to adopt the Western model of operation, preferably the Liberal Model focusing on the deregulation of the media market. Many international organizations proclaim to help new democracies build a healthy and free media in order to secure the fruit of democratization (Hadland, 2015, p. 48). Evidence from the new democracies that intend to adopt such political institutions and regulations indicate that none of them result in uniformity, let alone convergence toward the Liberal Model (Hadland, 2015, p. 23).

Voltmer (2008) concluded that because the existing models had been conceived in a Western context, fitting emerging democracies into any of them is no easy task. The present study takes a similar stance: while recognizing that Hallin and Mancini's models are a systematic and analytical tool in examining media systems, it will also re-examine the applicability of the models. Among the areas given second thoughts are the structure of media market, political parallelism, journalistic professionalization, and the state-media relationship.

To summarize this section, few or no emerging democracies fit into the three existing models (Voltmer, 2012). The tendency to model them in the category of the Polarized Pluralist category risks superficial analysis of these countries. The researcher has compared four countries across different regions to investigate whether they share similarities across regions, to what extent they encompass similar elements, and on what basis these similarities were formed.

Key Features of the State-Media Relationship in Emerging Democracies

Emerging democracies often encounter political instability and economic unsustainability when they replace the old regime. Simultaneously, they have

faced pressures from the rapid transition and an irresistible trend toward globalization (Hadland, 2015). In this sense, state-media relations in new, emerging democracies are different from those in more mature states, although state-media relations in these countries vary due to their diverse and contextual backgrounds. Against the backdrop of emerging democracies, the media aim to play a pivotal role in consolidating the new regime and raising people's awareness of democracy (Veltmer, 2006). In the context of the transition, the state-media relationship is marked by key features in emerging democracies, including the disconnect between the rule and the practice, the influence of elites in emerging democracies, and media fragility in the face of state intervention (Hadland, 2015). These key features differentiate the emerging state-media relationship from that of mature democracies.

Emerging democracies experience various societal changes concurrently and rapidly. The crucial transition begins with the change to a free-market economy, a change that alone may cause destabilization (Paris, 2004). At the same time, citizens may have a weak understanding of the concept of "democracy" (Hadland, 2015). The citizenry awareness has not reached what it potentially should or what is required by democracy. In other words, as Dahl (1994) argued, "democracy cannot be justified merely as a system for translating the raw, uniformed will of a popular majority into public policy." Paradoxically, then although the term "democracy" is defined as "the government by people," there may be no adequate manner for people to enjoy or assert these rights. On the one hand, "the government by people" could not be simply understood as people will get what they want, or what they think it is best for them. People should be informed, educated, and enlightened, at least to

some degree (Dahl, 1994). On the other hand, people are not provided any manner to realize their rights. The new state may tailor the national discourse to its favor. As a consequence, the relationship between the state and the media could be described as having strong state intervention against a backdrop of weak, fragile and vulnerable media.

The rapidity of change and centralized power has another profound effect on the state-media relationship. This is a critical dimension that has seldom been reflected in the analysis on the mature democracies as they are unlikely to have to confront the drastic and sudden change as emerging democracies do. For emerging democracies, the old regime could be overthrown overnight, but the media cannot automatically slip into a democratic role on the day the country turns into a democracy. At a minimum, media legislation and policy need to be updated. However, it usually took years for emerging democracies to implement new media legislation or revise an old one. In the words of Voltmer (2013), “the democratization of the media remains incomplete and deficient” in these countries. As Schedler et al. (1999) stated, post-authoritarian states are characterized by two features: weak rule of law and frail system of public accountability. In this sense, it takes time for emerging democracies to arrive at “normalization,” that is, behaving as other “normal” countries do (Voltmer, 2013).

Rapid change also results in a disconnect between constitutional guarantees and the practice in reality. For example, in Latin America, constitutionally protected rights failed to engender any autonomy for the media from political interference (Hadland, 2015). Although freedom of expression has been protected in constitution in many new democracies, it does not mean

that new democracies could guarantee the rights since they are still vulnerable to the old patterns and cleavages. Thus, there may be a period in which media operate in a “lawless vacuum,” where the nondemocratic rules are swept aside and media are left to function in an unregulated and insecure environment (Voltmer, 2013). The anticipated participation in public discussion does not happen because the enabling laws are not put in place (Diamond, Plattner, & Chu, 2013). Therefore, there are no procedures are set to guarantee public discussion could take place.

The development of political institutions tends to lag behind social and economic development (Huntington, 2006). When transplantation of constitutions and legislations took place in Latin America, Asia, and Africa, it created a gap between the laws and their application (O’Donnell, 1999). O’Donnell (1999, p. 36) called it the “visible gap between *pays légal* and the *pays réel*,” referring to the difference between formal rules and norms and what people actually do. These countries are also featured by feeble horizontal accountability. It means that, although the electoral dimension of vertical accountability exists, the internal mechanism is very weak. Even in some formally institutionalized new democracies, there are some skeptical notes on the degree to what extent these elections truly perform as an instrument (O’Donnell, 1999). This is not restricted to new democracies, but also some old democracies such as Colombia and Venezuela (O’Donnell, 1999).

The adoption of models from mature democracies with which new democracies are unfamiliar has led to institutional insecurities (Hadland, 2015). For emerging democracies in Africa, the Middle East, and Asia, the “state” is seen as an “imported phenomenon,” a pattern to organize institutions and

politics that have never been fully accepted (Porter, 1994). As Sørensen (2004) explained, new democracies always have “a thin layer of democratic coating upon a system of corrupt, patron-client rule without major change in the basic features of the old structure.” In other words, the fractures and cleavages that existed prior to the democratization in a country still exist and might play a significant role at the transitional stage, since they were embedded in the political, cultural, and social structures (Hadland, 2015). It means that externally these states have fixed and coherent entities, but internally they are still in the turmoil and flux (Sørensen, 2004, p. 10).

The symbiotic relationship between political elites and the media is not unique to democracies, mature or otherwise. However, in emerging democracies political elites have an even more intimate relationship with the media. On the one hand, they treat the media as a means to sustain their vested interests and maintain their benefit in the new regime. On the other hand, in some states, such as Chile and Brazil, media owners become part of the system of power. This creates further obstacles to diversity of the press and the media governance (Curran, 2002). For example, the old elites in Macedonia and Slovenia had new positions in the new regime (Broughton-Micova, 2014). However, the regime change did not change their attempts to maintain the old order and manipulate the media with the “thin layer of democratic coating upon a system of corrupt, patron-client rule without major change in the basic features of the old structure” (Sørensen, 2004, p. 56). It seems a paradox that media independence is premised on the maturity of a democracy, while a new democracy, by definition, would most likely not possess the capacity to foster

development of media, for it would have more pressing issues such as economic development to deal with (Price, 2002).

On the bright side, emerging democracies may have the opportunity to leapfrog over mistakes of long-established democracies and, especially in the initial flush of optimism and enthusiasm, emerging democracies are more open to new ideas and suggestions.

The Role of Media in Democratic Transformation

Media are seen as the lifeblood of democracy (Gunther & Mughan, 2000b). As discussed above, the functioning of media in emerging democracies fundamentally differs from their role in any Western democracy, and their situation is more complex: the media are expected to assume responsibilities in state building by creating national identity and stability and playing the role of watchdog to consolidate the new democracy.

The comparative study in *Democracy and the Media* (Gunther & Mughan, 2000a) presents an in-depth examination of the relationship between democracy and the media in 10 countries at different stages of democratization. Some were in the period of transition to democracy, such as Spain, Russia, Hungary, and Chile, where authoritarian controls over communication flows were largely relaxed and media contributed to the breakdown of authoritarianism. Some, such as Italy, the United States, Japan, Netherlands, Great Britain, and Germany, have had a longer period of democracy. In these cases, the situation was much more complicated than implied by the conventional wisdom of “minimal effects” (Mughan & Gunther, 2000). In

contrast, media, especially television broadcasting, can have a moderate even highly significant impact on political structures (Gunther & Mughan, 2000b).

In a Communist one-party system, media are used as instruments of the party's propaganda and ideological persuasion. During democratization, media tended to be more independent, pluralistic, and democratic (Sükösd, 2000). For instance, media played important roles in Hungary's transition by setting the democratic agenda and disseminating democratic values when citizens were eager to know about social and political issues, by facilitating the development of civil society and by presenting the new generation of leaders to voters (Sükösd, 2000). The functioning of media at this special point in Hungary's history illustrates the role of media in Eastern Europe, where topics of wide concern that might cast the regime in negative light used to be avoided entirely in public discussion.

The relationship between the media and political system is not unidirectional. Changes in cultural and political spheres also affect media, while media in turn can influence the transformative process. The basic principle of this relationship as stated by Siebert et al. (1956) is that "the press always takes on the form and coloration of the social and political structures within which it operates. Especially, it reflects the system of social control where the relations of individuals and institutions are adjusted." This is demonstrated in the case of Chile (Tironi & Sunkel, 2000). It has been suggested that when a democratic regime changes from a closed economy to an open market economy, the early years will be marked by the reciprocal relationship between the media and the state (Tironi & Sunkel, 2000). A given political system may affect the modernization of the media. At the time of Chile's transition, restructuring of

the media system took place under an authoritarian regime, so it avoided dramatic breaks with the past. As a result, unlike several European countries, such as Spain, Portugal and others, there was no discontinuity in the media system following the end of authoritarian regime and at the beginning of the consolidation of democracy.

In sum, this comparative study provides us a new perspective to examine the relationship between the state and the media. It suggests that the relationship between the two does not differ fundamentally from one nondemocratic regime to another (Gunther & Mughan, 2000b). The government's intention to control political news dispensed to the public is ever-present, whether in democracies or non-democracies. Perhaps the only significant difference is that the laws prohibit acting out such intentions in a democracy, whereas nondemocratic regimes labor little, if at all, under such prohibition or inhibition. It also suggests that in both old and new democracies, effective communication between the governors and the governed is shaped more by political factors than by technological factors (Gunther & Mughan, 2000b).

Literature on Media Policy in Small States

Most emerging democracies are small in terms of population and economy (Hadland, 2015). Because of their small size, many might have a "serious sovereignty deficit" or insufficient power resources to challenge restrictions placed on them (Agnew, 2005). After a review of the features of the state-media relationship and the role of media in the particular context, this section will examine the peculiarities of small media markets. Review of the constraints in

the media market will facilitate a better understanding of challenges arising from being small. Special attention should be paid to the fact that four peculiarities are concluded from studies based in established democracies. The reason is that “smallness” is rarely discussed in the context of studying emerging democracies.

Peculiarities of Small Media Markets

Population size correlates with the size of the media market (Puppis, d'Haenens, Steinmaurer, & Künzler, 2009). Small media markets are marked by resource constraints and survival issues. Since emerging democracies tend to be small states (Hadland, 2015), a discussion of the characteristics of the small media market will provide a better understanding of the market mechanism within the small states and followed by the impact derived from the peculiarities, which are the shortage of resources, market size, dependence, and vulnerability (Trappel, 1991).

The Shortage of Resources and Diversity

Shortage of resources refers to the availability of capital, know-how, creativity, talent, competence, and a professionally trained workforce in the media (Meier & Trappel, 1992). Small states tend toward relatively homogeneous products, rather than the differentiated manufacturing that occurs in big states (Davis, 1997; Helpman & Krugman, 1987; Venables, 1987). In brief, larger markets with greater resources can afford diversity of output to a greater degree than smaller markets (Balcytiene, 2009). Similarly, a small market is disadvantaged in promoting media product diversity because diversity in programming and content is a “luxury” (Puppis, 2009).

Under these circumstances, it is therefore rational to buy foreign programs rather than to produce local ones. Importing foreign programs has also become a “byproduct” of globalization; it is especially manifested in small states that share a language with bigger neighbors. However, importing foreign programs comes at the cost of cultural identity, especially when the neighboring countries are economically and culturally powerful (Burgelman & Pauwels, 1992; Steinmaurer, 2009). The cultural identity of citizens of small states is critical to their survival, because culture and history are the means and end of their existence (Smith, 1988).

For a country or a society, culture is a means of referring to their way of life, including identities, values, traditions, norms and meanings (Hodkinson, 2011). It is ordinary that it is embedded in details of everyday life, yet it is extraordinary in special artifacts that distinguish one nation from another. It is a complex concept as it is used either in a sense to refer to “mediated forms and practices of expression” (Hodkinson, 2011) or, as Williams (1988) put it, “the works and practices of intellectual and especially artistic activity”. For example, in Bhutan, the distinctiveness is most evidently reflected in the dress, language and institutions. The distinctiveness also extends to classical Bhutanese music as well as the arts.

Faced with external cultural challenges, cultural identity is the key to protecting identity from dilution. Cultural identity contains the persistent characteristics that can be used to trace a people and a nation. It is described as “an anchor in a sea of change” (Ura & Kinga, 2004). In addition, in facing globalization, proliferating new forms of media and culture while creating cultural homogenization that advances the interest of US, the importance of the

specialty of cultural identity of small emerging democracies is highlighted and dramatized (Kellner & Durham, 2006).

The difficulty small states face in identity tends to be compounded by a national policy that has weakened public service broadcasting and supported commercial television initiatives in affirming their cultural identity (Burgelman & Pauwels, 1992). This issue is more critical for small states with a larger neighbor sharing the same language. They are vulnerable especially facing with strong neighbors, both in the manner of political power and cultural advantage, and have lower chances to safeguard cultural diversity (Steinmaurer, 2009).

The Market Size

Population size determines market size. A limited market poses a question for survival and profitability for the media as enterprises in small states (Burgelman & Pauwels, 1992). The media industry is marked by high fixed costs but low marginal costs (Grisold, 1996). The first copy is expensive to produce, but once the first copy is printed, it is cheap to print multiple copies. Therefore, the larger a media market, the larger the profit for media companies; conversely, the smaller the media market, the smaller the profit for media companies. Market size also influences the openness of small states. Small states face stronger incentives to remain open, while large states can “afford” to be closed (Alesina & Wacziarg, 1998). Similarly, the media in small states may depend on “international trade” with larger neighboring countries to supply programming and news reporting. The size of the market also defines the influence it can exert on neighboring countries, or, conversely, the influence they can exert on it (Iosifidis, 2007).

Dependence

Small states fear economic dominance by their larger neighbors (Davis, 1997). They are more likely to depend on development by big countries, and they find it more difficult to maintain cultural sovereignty in local broadcasting because of the overspill of foreign television programs. In terms of media regulation, small states tend to be reactive to decisions made by big states (Meier & Trappel, 1992; Trappel, 1991). When they are part of a larger language market, they will inevitably be affected by commercialization and internationalization. For small European countries, Europeanization is becoming more and more important for media systems and implies new strategies for media regulation (Steinmaurer, 2009). Surprisingly, however, a recent study (Broughton-Micova, 2013) suggests that small size and a close relationship between political elites and media tended to support resistance to Europeanization. Small states were resisting the adoption of a common European Union media policy, suggesting that the conditions of media market and market players were crucial factors in the process of Europeanization.

Vulnerability

Besides economic and cultural vulnerabilities, the media in small states also feel threatened in their sovereignty. In television, broadcasters in such states face limited program choices and ownership (Puppis, 2009). Given that the survival of small-state media is prerequisite for development, economic vulnerability represents the most urgent problem. The threat of foreign takeover of media companies is more likely to arise in small states sharing a language with a larger neighbor (Meier & Trappel, 1992).

This was most evident in Bhutan. Given that the preservation of culture is crucial to the identity of Bhutan and therefore to its survival, Bhutan has a strong interest in keeping its identity distinct from that of its neighbors. As Indian and Western popular culture becomes more prevalent, particularly among the young, Bhutan faces a risk of foreign content “diluting” its distinctive culture.

Previous Study on Media Policy in Small States

The study of small states’ media has a long history, but it has occurred in a fragmented and unsystematic way. Continuing constructive research on small states has not been evident (Meier & Trappel, 1992). By the end of the 20th century, few scholars were focusing on research on small states. Indeed, “small states” were defined in various ways depending on the subjects and disciplines, such as international relations, economy, politics, and communication. To introduce a pragmatic analytical tool for media policy study, Trappel (1991) listed three characteristics of “smallness”: the limit of the market size, the dependence of the media market, and democratic corporatism. Establishing these features for small countries’ media provided perspective for investigating, thereby guiding further research. To help European countries avoid becoming “losers” in the international sphere, Trappel (1991) gave different suggestions that applied under different circumstances. Enhancing the regional identities of small states in Europe was one suggestion.

Researchers have also observed that because small Western European states live in the shadow of bigger neighbors, small states should face their own

limits, make good use of the existing resources, and adapt themselves to changes caused by the predominating interests of bigger states (Trappel, 1991).

Four models of policymaking in electronic media were identified by analyzing the characteristics of dependence, shortage of resources, market size, vulnerability, and corporatism of small states (Meier & Trappel, 1992): “Protectionism,” which emphasizes the role of state rather than market mechanisms; “Wait and See,” in which new concepts are still discussed and new models remain to be designed; the “Experimental Position Model,” which refers to gaining experience in competition; and the “Regulated Market,” in which state control is limited to the minimum. The four characteristic features of small-state media systems identified by Meier and Trappel (1992) encouraged further study by providing the aspects of analyzing small-state media systems. Still, there were no clear criteria in placing the 10 Western European countries into the different models. No explicit criteria were applied in categorizing these countries.

At this point, the relationship between smallness and media regulation was far from clear, and, although this was definitely an important issue in media policy, only a few publications had addressed small states (d’Haenens, Antoine, & Saeys, 2009). In 2009, d’Haenens and Puppis edited a special issue on small states based on a panel session for the 2007 conference of the International Communication Association in San Francisco. Each article was written about a geographic context where media policy and regulations were taken into account, with an emphasis on European small states.

Lund and Berg (2009) argued that co-regulation of the press by Denmark, Sweden, and Norway had created institutional conditions that favor national services based upon hybrid combinations of private and public funding, resulting in moderate competition and a relatively high degree of diversity in media output.

As argued by Balčytienė (2009), media regulation in the Baltic countries (Lithuania, Latvia and Estonia) can be characterized as economically very liberal and market-oriented, but the journalistic professionalism and democratic performance of the media are questionable, as there is no strong free-press tradition in the Baltic countries. This is distinct from the situation of media in the Scandinavian countries, where professional journalism and editorial independence are crucial factors of the Democratic Model. They do not share the same language with a large neighbor.

Some small countries, such as Switzerland, applied weak media concentration regulations to promote the media diversity. Although the policy seemed paradoxical, it could be interpreted as a protectionist approach (Künzler, 2009; Puppis & d’Haenens, 2009). The aim of preserving media diversity was additionally supported by distributing license fees in regions without a strong economic basis. However, the strategy led to a concentrated media landscape, which was regarded as a high cost for protecting media diversity.

In the book *Small among Giants: Television Broadcasting in Smaller Countries*, Lowe and Nissen (2011) enriched the study of media policy in small states from the perspective of television broadcasting, not only by affirming that

size matters in television broadcasting in various ways but also by suggesting that the issue is more complex when it comes to a specific socially, culturally, and historically situated context. They also concluded that the way television broadcasting is regulated is not solely related to size. The maturity of a country's political culture and its economic conditions are crucial factors. Recent research looking at more than two decades of data has concluded that small media systems face the limitation of a small advertising market and the low production capacity (Broughton-Micova, 2014).

Overall, the research has suggested that first, small states can provide a useful perspective in analyzing media systems and second, in considering the differences in culture and society within European small states, scholars need to look beyond the national level (Puppis & d'Haenens, 2009). To take media policy research to the next level, new frameworks of globalization and Europeanization should be developed (Puppis, et al., 2009).

Summary

The pioneering research has established the endeavor of studying the state-media relationship and the role of media in emerging democracies. It also demonstrates that attempts to categorize small emerging democracies in the Polarized Pluralist Model will most likely fail, because this model does not include key features of media in emerging democracies, particularities of small media markets, and characteristics of the transition context as indispensable components.

Media in emerging democracies and media policy in small states were reviewed separately, because the literature lacks a holistic and systematic

analysis of small emerging democracies that could yield a better understanding of media policy at a conceptual level. There is no study that, for example, broke the bounds of geography and compared countries across different regions. Nevertheless, studying emerging democracies across regions is important, as in the four states selected for the present study, because that it can shed light on the research beyond national boundaries and extend the existing theories on media systems by studying the media policy. Previous comparative research on media systems points out that the four dimensions used as the foundation for comparing the relationship between media systems and political systems in the 18 countries in Hallin and Mancini's work (2004) do not apply to emerging democracies because this framework overlooks the context of transition.

Media policy, as the guidance and framework for the arrangement of the media sector, should be contextualized within the cultural perspectives, historical trajectories, economic constraints, and particular limitations in which the media policy is promulgated. These factors will drive media policy into different pathways. Media policy should be based on sound knowledge of the society's needs, the role of media in the society, and the development of media technology. Different historical, cultural, geographic characteristics of countries will cause media policy to develop differently. Metaphorically, these characteristics are the genes encoded in the lifeblood of a society. Faced with particular challenges and chances, what type of media policy is anticipated and demanded in small emerging democracies?

Given the distinctiveness of the historical background and characteristics of the state-media relationship of small emerging democracies, the framework of media policy should be differentiated from that of established

democracies. Review of the literature raises the research questions this thesis will explore.

Research Questions

Based on key features of the state-media relationship, the researcher established that the cultural context comprising a state's historical and political background likely plays a crucial role in shaping media policy aiming to promote functional media in small emerging democracies. In addition to this factor, the framework of media policy should consider the viability and profitability of media within the transitional context. The ultimate research objective is to provide a framework to guide researchers to study media policy in order to build a coherent structure of the media system in small emerging democracies. With these goals in mind, this study frames three research questions:

RQ 1: How does national identity shape media policy in small emerging democracies?

RQ 2: How does media economics shape media policy in small emerging democracies?

RQ 3: What framework for studying media policy could guide researchers to study small emerging democracies?

As the previous research suggests, the cultural context constituted by the historical trajectories, preceding political background, and national identity plays a role in shaping the way media have operated and how media policy has regulated the media in emerging democracies. However, the disconnect between rules and application requires more investigation. Since the media of

small emerging democracies experience challenges to their viability and to their profitability, addressing the problem of how to survive financially while also serving as a watchdog is vital. How media economics shapes media policy in the four countries will be examined. Based on the similarities across different regions, a framework for studying media policy emerging democracies will be provided to suit the current situation.

CHAPTER THREE RESEARCH DESIGN AND METHODOLOGY

Introduction

Four small emerging democracies in Asia and Europe were chosen for the study, based on several factors. The four had small populations and were in similar states of transition. This chapter describes the process of research design, the methodology, and the strategies for data collection and analysis for examining the three research questions.

Choice of Methodology: Mixed Methodology

The choice of method was determined primarily by the research objective and research questions. The review of the literature in Chapter 2 presented three research questions:

RQ 1: How does national identity shape media policy in small emerging democracies?

RQ 2: How does media economics shape media policy in small emerging democracies?

RQ 3: What framework for studying media policy could guide researchers to study small emerging democracies?

To address the research questions would require data and information about the political and historical background in democratization, the role of the media in democratization, the cultural identity of each country, media

professionals' interpretation of cultural identity, and, for each country, media market analysis in the context of current media laws and policies.

Previous research has posited that no single theoretical models could describe key features of the state-media relationship in small emerging democracies. RQ 1 asks how the cultural context shapes the media policy in small emerging democracies. Since the national identity of small states represents the means and end of their existence (Smith, 1988), the characteristics of the transitional context must be understood as the premise for rethinking the role of media and media policy in these countries. RQ 1 is associated with attitudes, feelings, and understanding of key media stakeholders in each country as they experienced the social and regime changes in the transitional period, and the degree to which they knew how the state-media relationship shaped the way media operated and how the state's media policy regulated its media. Identifying these elements requires in-depth interviews with media practitioners who can share their understanding of values, social norms, national identity, and people's mindset in each specific country. The structure of a semi-structured interview leaves abundant room to reveal unanticipated facets of the media situation. In addition to interviews, accounts of the process of democratization and how media played the role in the four countries' transition will also be used.

To answer RQ 2 and RQ 3, secondary data were used to supplement the in-depth interviews, so as to provide a richer picture of media landscape and economics. Thus, a *mixed-methodology* research design was employed to provide extensive and detailed information. Guided by the three research questions, secondary data were collected from government reports, assessments

of media markets conducted by various international organizations, and media development reports done by media professionals or nongovernmental organizations. This method of triangulation, designed to obtain an efficient corroboration of any crucial account, involves seeking accounts from three or more perspectives (Pierce, 2008). The mixed-methodology approach provides multiple ways of knowing (Greene, 2007, p. 24) and presents a way to validate the quality of data gathered in the interviews.

In this study, the research subject is the country. Bhutan, Timor-Leste, Slovenia and Macedonia were selected because they met the criteria of “smallness” and “emerging democracies” defined in Chapter 1. They are at a transitional stage and have a demonstrable market change. These circumstances offer a good opportunity to study other changes democratization brought about in the countries’ media industries. Through preliminary contacts, the researcher ensured that media professionals in these countries were willing to share their viewpoints on the media landscape and development. The rapport between the interviewer and interviewees was built up months before commencing the interviews. Given the multiple locations of this project, the researcher also made sure that it was practical to complete the entire project on time.

This study is not aimed at comparing media systems, but rather proposes an alternative framework for researchers to study media policy in small emerging democracies based on an investigation of the relationship between democratization and media in specific contexts. In addition to considering the contextual factors, the impact of smallness must also be woven into the conceptualization of media policy.

In-depth Interview

This study relied heavily on semi-structured in-depth interviews, supplemented by secondary data and documentary data. The interviews were to understand beliefs, social norms, and values of media practitioner, to gather insights of the role of media in the transition period, and to obtain perspectives toward media development and the update of media policy (Broughton-Micova, 2013). This qualitative method provided an in-depth understanding of the relationship between social actors and the situation (Gaskell, 2000, p. 39).

According to the interview guidelines, each interview began by introducing the interview's purpose, which consisted of six major elements. The researcher used a *structured focused* comparison (George & Bennett, 2005) by asking a common set of questions across four countries. However, some questions differed between the two versions to accommodate two sets of media stakeholders, as will be explained below. Before proceeding to the core parts of the interview, the researcher started by establishing each interviewee's understanding the content of conversation would be used for research purpose solely and obtaining consent that to use the results for that purpose. Part 2 of the interview focused on the context in a broader manner. To avoid superficial commentary, the researcher intentionally asked questions that fit the interviewees' position and capability. This stage in the interview process covered the interviewees' institutes, the role of media from media practitioners' perspectives, and journalistic professionalism as it was pertinent to the current situation. Part 3 is concerned with national identity and its reflection in the media. The researcher's intent was to learn how interviewees distinguished themselves from their counterparts in neighboring countries and how their

media served to protect their national identity. Because legislation tends to lag behind social and economic development (Huntington, 2006) and because the transplantation of constitutions and legislations that took place in Latin America, Asia, and Africa resulted in a gap between the laws and application (O'Donnell, 1999), the researcher asked whether the journalists' constitutionally protected rights were actually ensured in practice. This was the main purpose of Part 4. For example, because media law in Timor-Leste had been reviewed in 2014, questions were specifically designed to elicit interviewees' personal opinions of the law and its possible influence in the near future. Part 5 aimed at understanding the viability and profitability of the media, whether media were struggling and if so, the factors behind it. Part 6 emphasized ways that the media regulator could keep an independent role. Table 3.1 shows four major themes of the interview and the essence of interview questions.

Table 3.1

Themes and Questions in Designing Topic Guideline

Themes	Essence of questions	Research Questions
Cultural context of the country	Brief introduction to media industry in your country	RQ1 & RQ3
	Role of media in new democracy and any improvement achieved	
	National identity through media (language, cultural, historical or social content)	
	Major differences with neighboring countries	
Freedom of Expression	Access to information	RQ1 & RQ3
	Freedom of expression in practice	
	Platform for free expression	
	Difficulty of realizing the right in small countries	
Media economics	Financial situation of media	RQ2 & RQ3
	Criteria for allocating advertisements	
	Biggest advertisers	
	Media survival & sustainability	
	Independence of regulator	RQ3

Media governance	Governance of advertising	
	Comments on media legislation	

Interviews can capture a viewpoint that is not captured in the official documents, as they are accompanied with fieldwork, which includes observation on media people and the situation of society. Reading documents cannot provide the context of how media policy was devised. Without feeling it by oneself, the real situation might be covered by appearance presented by the government or reflected in available documents. For example, there was no other ways to know the issue of freedom of expression until the researcher talked to journalists in Macedonia. Freedom of expression in Macedonia was more strictly constrained than what appeared in documents. The political power played a bigger role in local media enterprises. The political elites who owned media also had other businesses to support their media. This type of information could not be known other than talking to local media practitioners.

In addition, interviews with media practitioners can capture the most updated information regarding media development and media policymaking at that time. They represent different media organizations and industries, where the researcher can obtain diverse perspectives from multiple sources.

Another advantage is that interviewees' viewpoints can be triangulated among themselves. In some cases, interviewees may comment based on their impression or personal experiences. It is highly important to validate comments across different interviewees to avoid any personal bias. Talking to media people can allow the researcher to have real feelings about their careers and concerns of future. The researcher, as an outsider, had an opportunity to view

their perception more objectively as the researcher does not have any conflict of interests in their local media industries. More critically, the researcher has the chance to observe people and the country more closely compared to where appeared in documents.

Based on the main topics, two versions of interview guidelines were developed, one for media practitioners in press/radio/TV and the other for media regulators. The comparison between accounts from different media stakeholders helped to provide a deeper understanding of the media landscape.

Documentary Research

The advantage of documentary research is that it can span a great length of time so that the long-term consequences of events and decisions can be captured (Vartanian, 2011). To ensure reliability, the researcher sourced data from reputable organizations.

Multiple sources of secondary data were collected and used. To build background knowledge, much of this information was collected before the visit to the four countries. The documentary research served several purposes. First, it added “one layer of data to another to build a confirmatory edifice” (Fine, Wies, Weseen, & Wong, 2000, p.118). Second, it provided insights into the social norms and cultural context in each country. Third, it represented different opinions of the necessity and applicability of media policy when a given state became a democracy. Different organizations and institutes discussed the effectiveness of media policy if it came into force, and they held different views based on their interest and positions. The variety of viewpoints facilitated a

deeper understanding of the underlying relationship between the media and the state.

Data Collection: In-depth Interview & Documentary Study

Selection of Media Institutions and Interviewees

“Purposeful sampling,” a method commonly used in qualitative research for selecting informational cases (Lincoln & Guba, 1985), was used in the process of interviewee selection. It is mainly based on subjective or selective rather than statistical considerations. The requirement of “purposeful sampling” in the context of this study meant that three specific criteria must be fulfilled in the selection of interviewees: first, given that this study focuses at media policy level, media practitioner who could represent a media enterprise, media organization, or media governing agency, which were among key players, organizations, and departments in the media market, were preferable. Second, the selected interviewees should represent diverse media outlets. Third, interviewees should show interest and willingness to participate in the research. Table 3.2 illustrates the influential media institutions in four countries. The selection of interviewees concentrated on the leadership to achieve the perspectives from a policy level.

In particular, the researcher selected interviewees in the four categories of government, business, civil society, and academia to help ensure a diversity of voices:

- Government. The ministry of communication and information in the four countries are largely involved, except Slovenia, where the researcher was unable to access government officers. Interviewing

officers from the ministry allowed the researcher to understand media landscape in a holistic way;

- Business. Diverse media industries, such as TV and radio broadcasters, press media, and film companies, could provide diverse information and viewpoints of media practitioners in the industry. For example, *Timor Post* was one of the most popular newspapers in Timor-Leste so that it had high circulation. *Kuensel* in Bhutan, was the first government bulletin, founded in 1967.
- Civil society. Media practitioners from civil society offer an independent voice that could not be replaced by other institutes. Their perspectives were unique in terms of their motivations, missions, and goals of their organizations. They were passionate and positive with future of media although facing unpleasant environment nowadays. It was manifested in Timor-Leste and Macedonia, where journalists and reporters were optimistic about media development although their expression was restricted by government;
- Academia. The viewpoints of academics who follow the development of media would be helpful.

Table 3.2

List of Media Institutions in Bhutan, Timor-Leste, Slovenia, and Macedonia from which Interviewees were Selected

	Bhutan	Timor-Leste	Slovenia	Macedonia
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Media Regulator	Bhutan InfoComm Media Authority (BICMA)			Agency for Audio and Audiovisual Media Services
Government	Department of Information & Media, Ministry of Information & Communications	Center for Radio Community (CRC)		
Media Industries	Bhutan Broadcasting Service	Radio-Televisão Timor-Leste (RTTL)	Val 202	Metamorphosis Foundation for Internet and Society
	<i>Kuensel</i>		Infonet	
	<i>Bhutan Observer</i> (kept online version only since August 2013)			
	<i>Bhutan Times</i>			
	<i>Bhutan Today</i>	<i>Independente</i>		
	Motion Picture Association of Bhutan			
University			University of Ljubljana	International Balkan University
				Macedonian Institute for Media (MIM)
Media Organization		Timor-Leste Media Development Center		Association of Journalists of Macedonia (AJM)
		Timor Lorosa'e Journalist Association		Independent Trade Union of Journalists and Media Workers
		Asosiasaun Radio Komunidade		Media Development Center (MDC)

		Timor-Leste (ARKTL)		
		Institute of Communicati on Studies		
		Media Trust Fund Foundation		Balkan Investigative Reporting Network (BIRN)

One purpose of qualitative data collection is to gather a wide range of opinions and presentations about an issue to attain richness and depth of information (Kuzel, 1992). Thus, it is unrealistic to decide the exact number of participants required; instead, the sample size depends on the topic and the resources available (Gaskell, 2000). In the study of media policy, researchers are more concerned with how media law works in practice, whether there are factors, perhaps social, legal or political, that impede the implementation of media law. From this study's perspective, the main considerations were that participants could best represent the voices of media practitioners and that they could best contribute to the research questions. The major media institutions in each country were largely represented in the list from which leading media professionals were selected.

In good qualitative research, the sample is reached when the interviews are "saturated." In the principle of "saturation" (Guest, Bruce, & Johnson, 2006), the quality of qualitative research is determined by its richness, complexity, and depth of data sources rather than by a "formula" providing the "correct" sample size (Powell & Connaway, 2004). It means that the researcher continues to collect data until research questions are sufficiently answered or

until further collecting provides no more new nuances or critical issues, showing that the sampling is fully saturated (Marshall, 1996).

Given the specific criteria in selecting interviewees, the researcher deliberately selected media practitioners whose positions were at higher levels in particular media organizations or enterprises, taking into account their availability and feasibility. The researcher selected interviewees with the following considerations:

- Snowball sampling was used in the selection of interviewees.

Initially, the researcher had access to a handful of media people from each particular country. They were at a higher level in particular media industries or organizations. The researcher introduced the purpose of study to them via email and these potential interviewees showed interest in this topic and willingness in participating in interviews. In addition, the researcher recruited more interviewees through the initial informants' social networks. They were basically recommended by the initial informants because of their potential contribution to this research. Of the 40 potential interviewees contacted, the researcher managed to schedule 37 interviews eventually.

- By emails, the researcher also received some pieces written by potential interviewees. It provided the chance to get a better understanding of the society background, the background of the institute where interviewees are from, and validity of this source. More importantly, they are willing to share their perception and viewpoints in an authentic manner.

The complete list of interviewees is shown in Appendix C.

Collection of In-depth Interview Data

In accordance with the requirements of the University, ethics approval was sought from the Institutional Review Board (IRB) at Nanyang Technological University on 26 March 2014 and approved on 28 April 2014. The application form, consent form, and guidelines of interview for application are attached as appendices A & B.

As four countries across East Asia and Eastern and Central Europe were selected in this research, the challenge in collecting data was to make sure interviews would be arranged during the short stays in each country. Constrained by time and budget, the researcher scheduled 21 days in Bhutan, eight days in Timor-Leste, five days in Slovenia, and five days in Macedonia. Fieldwork in the four locations was supported by different grants. The one for Bhutan was sponsored by the Ministry of Information and Communication of Royal Government of Bhutan, since my supervisor, Professor Ang Peng Hwa, was invited as a media consultant for media policy. The research in Timor-Leste was supported by the Wee Kim Wee School of Communication and Information with a S\$3K Grant. The one in Slovenia and Macedonia was sponsored by the Academic Research Fund (AcRF) Tier 1 Grant 2014. To guarantee the scheduled interviews could be fully conducted, the researcher contacted interviewees in advance. However, some of the appointments in Slovenia were canceled because the interviewees were unavailable.

In total, the number of interviewees from the four countries totaled 37. They are tabulated in Appendix C along with their occupations and employers.

Collection of Secondary Data

Secondary data collection started months before the interviews. It helped the researcher uncover the details of history and politics, devise the interview guidelines, and also validate the content of interviews during the data analysis phase.

In the process of data collection, the researcher followed the four criteria offered by Scott (2014) in *Matter of Record: Documentary Sources in Social Research*: authenticity, credibility, representativeness, and meaning.

Authenticity is a fundamental criterion of social research and is concerned with genuineness (Scott, 2014). Basically, the sources of the secondary data mainly comprised media-related government agencies, regional independent media organizations, civil society groups, international organizations, and nongovernmental organizations. The origin of secondary data was unquestionable. For example, *Media Integrity Matters* (Petković & Trbovc, 2014) is a book addressing obstacles to the democratic development of media systems in South East European countries. Five countries including Macedonia were investigated in Petković and Trbovc's project. It was part of the regional project that was a joint effort of seven civil society organizations from seven countries. The researcher used this book to know the different stages of development and implementation of media policy after the independence of Macedonia. Similarly, the researcher relied on equivalent books that were also a part of regional project – South East European Network for Professionalization of the Media (SEENPM) – to get a better understanding of Slovenian media market and its historical background in the 1990s. The selected documents, *Media Policy in Slovenia in the 1990s* (Hrvatín & Milosavljević, 2001) and *You*

Call This a Media Market (Hrvatin & Petković, 2008), provided the systematic examination of Slovenian media and the relationship between the media and state. Many of these documents were recommended and provided by authors who were also interviewees. Regarding secondary data of Bhutan and Timor-Leste, documents were not collected as systematically as in Macedonia and Slovenia, where media research was better developed. The understanding of the media landscape of Bhutan relied mainly on the interviews. Besides the interviews, *Media Development Assessment 2010*, conducted by the United Nations Educational, Scientific and Cultural Organization (UNESCO), was considered as an official source and was deemed to have more credibility than others. For the same reason, *Bhutan Information and Media Impact Study 2013*, presented by United Nations (UN), was also used to supply important secondary data.

To maintain consistency in secondary data collection in each country, the researcher attempted to search the secondary data generated from equivalent sources. In practice, the goal of having equivalent similar sources proved to be unrealistic, because different countries place different departments in charge of media.

Data Analysis

The present study consists of four countries while each one is an individual study. The researcher approached four countries with the same strategies and gathered the same types of data.

At the end of 2014, interviews were transcribed, and after reviewing all the transcripts, the researcher returned to the coding scheme. The interviews in

four countries totaled over 50 hours. It took approximately five hours to transcribe a one-hour interview. Therefore, about 250 hours were spent on transcribing recordings, with transcripts totaling 324,800 words. Given that the amount of raw data was so large, the researcher chose one out of 37 transcripts to show the raw data in Appendix D.

Unlike quantitative coding, which is intended to reduce data, qualitative coding is about data retention. Coding is not merely labeling all parts under some topics; it is intended to bring them together so that they can be reviewed thoroughly (Richards, 2009). The coding is inductive, as it was conducted manually with markers and paper. The coding scheme was originally generated from the themes of the interview guidelines. In practice, interviewees deepened and broadened the themes based on their experiences and opinions, since the semi-structured interview left some room for extending the range of topics. Accordingly, the coding scheme was revised after the researcher delved into the transcripts, and new codes were added. This allowed a richer data analysis in the following step. Four tables were generated separately for reorganizing interviewees' comments in line with codes.

In this research, data comprised interview transcripts and secondary sources that consisted primarily of documents obtained by the researcher from various sources. They mainly included open-access documents published online and government reports provided by interviewees, as could be seen in the case of Bhutan and Macedonia. The researcher was conscientious in gathering secondary materials in each country. The researcher found it very difficult to keep an exact evenness in the number of interviewees and the amount of secondary data across four countries, two of which had hardly been touched by

other researchers before (Bhutan & Timor-Leste). With the assistance from interviewees, the researcher secured access to a number of the government documents and on-going policy drafts. Thus, the data of four countries were extended and deepened. Furthermore, the data analysis on secondary data served as triangulation on interviews, as the main measure of *reliability* lies in the *consistency* (Pierce, 2008).

This research consisted of extensive fieldwork that required much empirical evidence, not only from the discourse of interviews but also from direct observation. The secondary data complemented the in-depth interviews, but it could not replace the importance of the first-hand data. The interviews were crucial to the purpose of the present study and obviously they provided richer information than expected, which will be presented in the following chapters.

CHAPTER FOUR

CULTURAL CONTEXT AND THE MEDIA IN BHUTAN, TIMOR-LESTE, SLOVENIA, AND MACEDONIA

National identity can be defined from different perspectives. From a geopolitical perspective, national identity represents relations between nations or territories and is connected with the creation of foreign policy (Dijking, 1996, p. 11). This concept of national identity has a strong feeling of belonging to a group. National identity can also be viewed with the following factors in mind: historical territory, historical memory, language, a common economy and common legal rights for all members (Smith, 1991, p. 14). Language is most commonly seen as the focus of national identity (Schlesinger, 1991). Language is also a significant factor in nation-building. The language choice at the advent of one country's independence cannot be taken lightly, as it relates to construction of a national identity (Molnar, 2010). For small emerging democracies, characterized by smallness and features of underdeveloped political institutions and financial vulnerability, national identity is key to their existence. As discussed in Chapter 2, small media markets are marked by economic and cultural vulnerability, especially when they are part of a larger language market (Meier & Trappel, 1992; Trappel, 1991). On the one hand, they are more likely to depend on development by bigger countries; on the other hand, this will put small countries under pressure of preserving their national identity.

This chapter discusses national identity in the four countries with a focus on how democratization took place and how language and history

influenced the media and policymaking. The chapter addresses Research Question 1: How does national identity shape media policy in small emerging democracies?

Introduction

The relationship between media and political and socioeconomic spheres is not unidirectional. Changes in the political-cultural spheres affect the media just as the media influence the process of democratization.

Bhutan

Bhutan is a small country in Southern Asia, sandwiched between two giant neighbors—India to the south and China to the north. It has a small population of 741,919 (U.S. Central Intelligence Agency, 2014a). It is one of the poorest countries in the world, with a GDP of US\$5,096 per capita in 2011, ranking 140 out of 199 countries in the UN’s Human Development Index (Jahan & Jespersen, 2015).

Surrounded by the Himalayas and largely isolated from the rest of the world for hundreds of years (Bhutan Media Foundation, 2012), Bhutan is one of the two countries in the region that have never been conquered by other countries (Rose, 1977). The other country is Nepal. Bhutan is marked by picturesque landscape and steep mountains. Bhutan’s national symbol is the “druk,” which in Dzongkha, the official language of Bhutan, means the “thunder dragon” of Bhutanese mythology. Druk Yul, known as “land of the thunder dragon” in Dzongkha, represents the spirit of embracing a balance between nature and mankind. Bhutanese are proud of their distinguished national identity and history (Smith & Kingsley, 2015).

The mountainous geographic features once formed a natural barrier insulating Bhutan's values and culture from the outside world and from such influences as capitalism and globalization. Ultimately, though, the desire to modernize the country by introducing cable service overrode the aspiration to keep the national identity intact (The Guardian, 2003).

Regime Change and the Media in Bhutan

Many paths to democratization have been seen in history, but Bhutan's path was unique in its cause and in the form that it took. The change was neither initiated by international pressure nor triggered by an internal economic crisis (Turner, Chuki & Tshering, 2011). The unusual aspect lies in the fact that the fourth king of Bhutan, the country's previous authoritarian leader, was the one who introduced democracy. He spent years in persuading and preparing Bhutanese who were apprehensive about democracy and finally "imposed" democracy in Bhutan. Unlike the bottom-up revolution that has occurred elsewhere, Bhutan's regime transition was introduced and imposed from the top (Sinpeng, 2007).

Among those countries in the third wave of democratization, Bhutan formed a special—if not unique—case. In 1957, King Jigme Dorji Wangchuck established a national legislature, setting the country on a path toward a qualified form of democratic representation. Twelve years later, he created the Royal Advisory Council, and three years after that, a cabinet. At the end of 2007, the Bhutanese participated in their first national election to choose two component bodies of the new parliament (Turner et al., 2011). Shortly afterwards, Bhutan adopted its first written Constitution on 18 July, 2008, shifting the country's governance from absolute monarchy under King Jigme

Dorji Wangchuck to constitutional monarchy under his son and successor Bhutan's fourth king, Jigme Singye Wangchuck. The Constitution was also signed by designated representatives of the Bhutanese people, signalling a smooth transition from a monarchy to a democracy. Given the growing realization that reform was necessary for development, the new constitution explicitly described the fundamental rights for Bhutanese citizens (Ministry of Foreign Affairs of Denmark, 2015). Jigme Singye Wangchuck said, "I'm trying to be a good king who loves his people. But I can't say that all the successive kings will be good. To ensure long-term happiness for Bhutanese people, we must promote democracy, because an effective political system is more important than a throne" (Fan, 2008).

This peaceful transition from absolute monarchy to democracy has several noteworthy points. First, the elements that normally could contribute to the fall of an absolute leader, such as repression, gross incompetence, and corruption, were absent in Bhutan (Turner et al., 2011). Second and especially interesting is that the political transformation was proposed as a "royal directive" by the monarchy rather than initiated by the public. King Jigme Singye Wangchuck exhibited vision and courage in initiating the democratization from his position as the leader of a kingdom. Third, besides the royal decree, the country's relative isolation and the high level of consensus among the people made democratization easier for Bhutan (Sinpeng, 2007).

The top-down transition and peaceful democratization provided good conditions for developing media in Bhutan. First, the government played a positive role in promoting the media when the King decided to move to a democracy instead of keeping the status quo as a monarchy. It was the

government's decision to empower the media. The Royal Government encouraged media development by liberalizing the rules that had hitherto barred the entry of newspapers, since the government recognized the role of media as an important pillar of a vibrant democracy. The first government bulletin was published for public information in 1967. Between 2006 and 2009, five private newspapers were launched, dedicating themselves to the role of a watchdog to ensure the accountability and transparency of the new government. Along with the advent of private newspapers, new radio stations were launched.

Second, the top-down transition to democracy meant that people who never had any reason to participate in public discourse must be educated and informed to do so in future. It also implicated that media were provided with the opportunity to facilitate participation from the public by reporting news, views, and even critical comments on the government. On the one hand, media were encouraged by the government as essential pillar of a democracy; on the other hand, media were desired by people who never had such rights and opportunity to express themselves before. The managing director of the leading newspaper the government-owned *Kuensel*, Chenchu Tshering (June, 2012) was to point out, "Bhutan has the most diverse media the country has ever seen. . . . [T]here might be too many of them for such a small media market mostly concentrated on the capital city, Thimphu." Given the small media market, the diversity of media in Bhutan was witnessed by the researcher in 2012. More important, Bhutan has "the most critical press in the world" as commented by an officer of the Department of Information and Media. Tsewang (June, 2012) remarked that: "We might have the most critical press in the world and they are able to criticize anything of the government. They can even call the prime

minister at night” Yet a potential threat confronted the new media establishment: a low literacy rate among adults (63%) limited the market for the relatively large number of newspapers (National Statistics Bureau, 2012). The sustainability of the media is discussed in detail in Chapter 5.

Emerging democracies have some shared characteristics such as inchoate institutions, lack of rule of law and transparency. Bhutan stands as an exceptional case in emerging democracies in terms of independence of judiciary and transparency. According to *Corruption Perceptions Index 2016*, Bhutan ranked 27th among 176 countries/territories around the world (Transparency International, 2016). This places it in the top 15% of countries/territories surveyed, a ranking that is impressive even among developed countries. The transparency of the civil service system and asset declaration has been seen in Bhutan since 2008 (Dorji, 2016). Bhutan ranked 6th in Asia and was recognized as the cleanest country in the region. The well-formed rule of law and transparency of Bhutan are unusual among emerging democracies.

Market Change and Its Influence on the Media in Bhutan

Television and the Internet were introduced in 1999. With affordable household subscriptions, viewers were provided with 46 channels of entertainment, mostly from Rupert Murdoch’s Star TV network (The Guardian, 2003). The sudden introduction of television posed a tension between traditional Bhutanese values and identity and Western values. The widespread materialism and capitalism portrayed in modern commercial television went counter to Bhutanese culture (The Guardian, 2003). Dasho Kinley Dorji (June, 2012), the Secretary of the Ministry of Information and Communications of Bhutan, said, “The sudden start of TV caught the society by surprise, but the understanding of [the] impact

of media only starts now. Some negative impact has been witnessed.” By that, Dasho Dorji meant that in indiscriminate adoption of foreign culture would lead to the erosion of the Bhutanese culture. Although there was no causal relationship between the introduction of commercial media and the crime rate, social problems, such as cases of drug abuse, theft and even murder, were regarded as the consequences of imitating the media. The widespread belief was that it posed a challenge to media policymakers: what countermeasures could be applied to curb this situation?

Besides the negative effect from media, telenovelas and movies took the fascination for the outside world to an unprecedented degree. Not surprisingly, Bollywood movies were warmly welcomed by Bhutanese, especially the young (Stancati, 2011). In addition, South Korean pop culture changed the way the youngsters dressed, from hairstyles to skinny jeans, not to mention the dancing moves (Gurung, 2014). Media Officer Tsewang (June, 2012) said, “The youngsters nowadays act and dress like they are Korean. None of them are willing to continue wearing the traditional costumes.”

Debates about the risks of diluting the kingdom’s national identity and values have been widespread (Mathou, 2000). Aware of these concerns, the Royal Government aimed to incorporate Bhutan’s well-known concept of Gross National Happiness (GNH) into the guidelines of the media policy. This cultural guideline aims to maintain the balance between material and nonmaterial values.

The National Identity of Bhutan

The national identity is reflected in Bhutanese daily practice, such as the wearing of the *gho* by men and the *kira* by women, traditional ceremonies, and the distinctive windows and eaves of traditional Bhutanese houses. The ongoing quest for practices that reflect its distinct national identity may be seen in the introduction of Pedestrian Day in Thimphu. When it first began in June 2012, no vehicles except for taxis and emergency vehicles were allowed in downtown Thimphu every Tuesday (Bhutan Broadcasting Services, 2012). While laudable as it promoted more walking, it also created some inconvenience as a major connecting road went through the downtown. A survey by the National Environment Commission found that more than 63% of respondents supported this holiday, while 19% were against it (Business Bhutan, 4 August 2012). With elections looming, however, the Cabinet decided to change Pedestrian Day to the first Sundays of each month beginning December 2, 2012, and held it also on June 5 to mark World Environment Day (Dorji, 2012).

Besides these outward manifestations of the country's culture, the nation's identity is distilled in the best-known notion of Bhutan: Gross National Happiness (GNH). Bhutanese traditional values, as a major part of the country's historical heritage, have always been shaped by Buddhist concepts (Françoise, 2006) and GNH is no exception. The interpretation of "happiness" extends beyond the conventionally understood meaning of a good feeling in emotion. Happiness is perceived in a serious manner and emphasized in all walks of life. The well-known systematized concept of Gross National Happiness (GNH) is a proof that Bhutan treats happiness not only as a spiritual value, but also as a practical philosophy (Ura, Alkire, Zangmo, & Wangdi, 2012).

The focus on “happiness” was first written in Bhutan’s legal code of 1729:

If the government cannot create happiness for its people, then there is no purpose for government to exist.

The term “Gross National Happiness” was coined in 1972 by the fourth king, Jigme Singye Wangchuck, who stated that “Gross National Happiness is more important than Gross National Product.” It is written in the new Constitution of Bhutan (Royal Government of Bhutan, 2008):

The State shall strive to promote those conditions that will enable the pursuit of Gross National Happiness.

Given the possible threat to its identity from imported media content, aligning media development and policy in line with the objectives of GNH was important to the leadership and also logical. It was important that Bhutan distinguish itself in its national identity in order to maintain sovereignty and uniqueness, and also to differentiate itself from the two largest nations in the world—India and China—which sandwich it. Cultural distinctiveness is seen as having intrinsic value, useful for the preservation of the sovereignty of a nation faced with asymmetry of power with its neighbors (Ura & Kinga, 2004).

Bhutan’s fifth and current king, Jigme Khesar Namgyel Wangchuck, gave more weight to GNH, saying that fulfilling the vision of GNH would be one of the four main responsibilities of his reign. To operationalize GNH, an index was created by the Centre for Bhutan Studies in 2008 based on data collected in a nationwide representative survey (Ura et al., 2012). This first

version was simplified and updated in 2010. The GNH Index involves a set of 33 indicators under nine domains that capture the common aspirations of Bhutanese people.

GNH is reflected in the 2013 Media Policy of the Royal Government of Bhutan. It stipulates in section 3.7 Preservation of Culture:

. . . Media should produce content that promote GNH values but in a way that also interests and grabs viewers and readers (3.7.1).

Enhance promotion and development of local content by incentivizing media organizations to create more local content (3.7.2).

This distinguishes Bhutan from other countries that prioritize different values in the enactment and implementation of media policy. GNH is not only a part of national identity, but is also intended to be a cultural ballast, to counter-balance the negative effect of opening up to the world.

Timor-Leste

Timor-Leste is also known as East Timor, as it is located in the eastern part of Timor, an island in the Indonesian archipelago. After Indonesia, Timor-Leste's closest neighbor is Australia, which is about 400 miles to the south.

Its geography and history, especially the Portuguese colonization, have led to its complexity of languages. Tetum is the mother tongue of Timorese and is widely spoken in its capital Dili. Because of its close geographic relationship with Indonesia, Indonesian, along with English, is one of the working languages under the Constitution. In addition, Tetum and Portuguese are recognized as official languages. The diversity of indigenous languages has

been seen in remote districts of Timor-Leste. The influence of Portuguese colonization still reflects in some dialects (U.S. Central Intelligence Agency, 2014c).

It has a population of 1.2 million, of whom more than 200,000 live in the capital city, Dili. The adult literacy rate was 64.07% in 2015 according to UNESCO (2015). In September 2002, after gaining independence the previous May, it joined the UN as the 191st member state. It is one of the poorest countries in the world, with a per-capita GDP of \$1,393 and ranking 134 out of 199 countries in the UN's Human Development Index in 2011 (U.S. Central Intelligence Agency, 2014c). Although the economy has improved in recent years, poverty and high unemployment still persist (Klugman, 2011). In contrast to Bhutan's independence, Timor-Leste's was the product of combined international and domestic forces that worked together to enable a regime change. Pre-independence Timor-Leste experienced a prolonged history of colonization and invasion. Conflicts within communities still threaten the peace.

After independence in 2002, Timor-Leste had a major political crisis every two years; the most serious one took place in 2006 and almost brought the country to collapse again (Centre of Studies for Peace and Development, 2012). The root of the crisis was weak governance, absence of reliable information and limited platforms for communication, and a largely disempowered population (Brady & Timberman, 2006). This reflected in the demonstrations by "petitioners," consisting of 594 dismissed soldiers from the FALINTIL-Forças de Defesa de Timor-Leste (F-FDTL). Petitioners, most of whom came from the west, felt they were treated discriminately by senior

officers, who came from the east. The demonstrations by petitioners caused widespread conflicts subsequently. This consequence is largely attributed to the underdeveloped political institutions and the absence of public discourse.

Regime Change and the Media in Timor-Leste

Timor-Leste's media development is substantially shaped by the long and complex history of Portuguese colonization, the invasion by Indonesia, struggles between internal powers, and persistent conflicts in different districts. Portuguese colonization of Timor-Leste dates back to the 16th century (U.S. Central Intelligence Agency, 2014c). In 1975, following the election of a socialist government in Portugal, the dominant political party, FRETILIN (The Armed Forces for the National Liberation of East Timorese), declared the independence of the Democratic Republic of Timor-Leste on November 28, 1975. This occurred with the blessing of the Portuguese government (Government of Timor-Leste, 2016). But it was the period of the downfall of Vietnam and fear of the Red Tide. So when Indonesian troops invaded in December 1975, the Western world and Southeast Asia closed an eye. Among members of Association of Southeast Asian Nations (ASEAN), only Singapore, as a small state, stood by Timor-Leste, while the remainder supported Indonesia in opposing a UN General Assembly resolution in East Timor (Desker, 2015). Indonesia engrossed East Timor as its 27th province—Timor Timur—without recognition by either the East Timorese or the United Nations. From 1975 to 1999, Timor-Leste experienced a 24-year period of Indonesian “custody.” During this period, FRETILIN troops never stopped fighting against the occupiers. During the first year of occupation, some 60,000 to 100,000 Timorese were killed (Molnar, 2010).

After years of turbulence, the United Nations Mission in East Timor (UNAMET) stepped in to conduct an independence referendum on August 30, 1999. The referendum received enthusiastic support among the 450,000 registered voters (U.S. Central Intelligence Agency, 2014c). It was the first time in their modern history that the Timorese could decide their own fate. Not surprisingly, 78.5% of Timorese voted for independence; 21% of Timorese voted for special autonomy within Indonesia (Martin, 2001). Indonesia took umbrage when the announcement was made, and its military destroyed more than 70% of buildings and infrastructure in a “scorched earth” policy (Soares, 2000). To bring an end to the violence, on September 15, 1999, the UN Security Council dispatched the International Force in East Timor (INTERFET), a peacekeeping force of 7,000 troops under the command of Australian Major-General Peter Cosgrove. The peace-keeping force comprised troops from 22 nations (including Australia & New Zealand). In February 2000, INTERFET turned over military operations to the United Nations Transitional Administration in East Timor (UNTAET), which restored peace and order (Molnar, 2010).

Different from the smooth transition of Bhutan, the path of Timorese democratization was marked both by the international pressure and internal crisis. They differ in the cause of democratization and the attitude of the government towards media. Where democracy was introduced by the former authoritarian leader in Bhutan, Timorese democratization was the mixed product of international pressure and internal crisis. Bhutanese government encouraged the media to nurture citizens. However, Timor-Leste had its imperative to rebuild peace and security for citizens to restore their confidence.

As Leach and Kingsbury (2013) explained, “Timor-Leste remains strongly tied to its past, both through the persistence of custom and the memory of conflict.” Already poor and with the major portion of its infrastructure destroyed, nation-building was no easy task for this new democracy. Complicating matters, state-society relations were dominated by populism, patronage, and political clientelism (Centre of Studies for Peace and Development, 2012).

Democratization is an ongoing process, rather than a consequence of the former sacrifice and efforts. As discussed in Chapter 2, new democracies tend to exhibit “a thin layer of democratic coating,” but the old structure often does not change much, at least not quickly (Sørensen, 2004). Particularly in democracies such as Timor-Leste, which has complex conflicts, struggles, and persistent forces from the old elites, the consolidation of democracy will take extraordinary effort. Timor-Leste’s media policy requires more attention on the importance of national cohesion to the creation of a viable nation (Leach & Kingsbury, 2013). Although a democracy, it remains weak in security services, institutional transparency, rule of law, and economic development (Margesson & Vaughn, 2009).

In these circumstances, the media were expected to nurture citizens with democratic values and norms, engage involvement of citizens in political life, and provide effective means for citizens to hold governments accountable. However, this expectation was undermined by the destabilization caused by the transition from an underdeveloped country that was affected by long history of disturbance and unsettlement. As much of the communication infrastructure was devastated by the Indonesian military when they left, it had to be built from the ground up. According to *Timor-Leste Communication and Media Survey*

(Soares & Dooradi, 2011), 16% of the population had no access to any form of media (radio, television, newspapers, internet or mobile phones) until 2010. When the researcher conducted fieldwork in August 2014, overall economic conditions were reflected in the poor road conditions and half-completed construction projects. The lack of infrastructure and the challenging conditions for transportation had a direct impact on the media: the print media are centered in the capital Dili.

Although significant progress has been made in rebuilding infrastructure, the quality and level of service still fall short of what is needed. In interviews with different stakeholders, the researcher found another factor contributing to the fact that the media did not properly play the hoped-for role: the UN and the Timorese government focused more on “hardware construction” than on “software construction” such as emphasizing the importance of media in promoting responsible citizenship and the collective national identity. This was partly attributable to international aid, which often came in the form of tangible material goods as opposed to less tangible but sometimes even more important support services.

In the *Corruption Perceptions Index 2016*, Timor-Leste ranked 101th of the 176 countries/ territories assessed, among the bottom half of this index. However, this was Timor-Leste’s best score since 2012 (Transparency International, 2016). This improvement of its governance was achieved by building a culture of accountability and openness by the Sixth Constitutional Government (Government of Timor-Leste, 2017).

Market Change and Its Influence on the Media in Timor-Leste

Prior to 1999, there was no community radio stations in Timor-Leste. They were established by international organizations and NGO donors after Indonesia destroyed its broadcast infrastructure. The radio system was therefore built from scratch. Eight community radio stations were set up between 2000 and 2002 by the Community Empowerment Program of the World Bank. There were 15 community radio stations set up in all 13 districts. Radio continues to be the most popular medium with a high coverage of 90% of population (BBC News, 2015b).

Besides the high coverage of radio, newspapers and television broadcasters served as an important role in Timor-Leste as well. By 2015, there were seven newspapers in Timor-Leste and one television broadcaster, all based in the capital city Dili. There was not much distribution outside Dili because of the high cost of delivery, low literacy and low demand. Newspaper circulations are small and not independently audited. This could be attributed to the high price of newspaper, low purchasing power and small population. Despite the low circulation of newspapers, the most popular newspaper *Timor Post* was profitable because of the high advertising cost. This will be further discussed in Chapter 5.

The advantage of the support from international organizations and NGOs is that they helped Timorese media immediately; the disadvantage is that after the system was set up, the existent human resource could not guarantee the sustainability of community radios. This resulted in most practitioners at community radio stations working on a voluntary basis. The introduction of community radio solved the short-term problem such as building the

infrastructure. It did not address the long-term problem of financial sustainability. This will also be discussed in Chapter 5.

The National Identity of Timor-Leste

Timorese national identity is reflected in their “Sacred House,” *uma luli*, a distinctive feature of traditional Timorese culture (Hicks, 2013), which has been called a house society. Houses are symbolic of a social group and thus of group identity. Therefore, it is easy to understand the lack of national cohesion, since Timorese identity is based on indigenous cultural conceptualization. Some interviewees said that although Timorese national identity may be difficult to trace in Dili, it was preserved well in remote districts. Dance, handicrafts, traditional buildings, and traditional ceremonies are still part of life. However, the protection of national identity is not emphasized in the Timorese media.

Interviewees were asked, “What is your national identity? How do you define yourself as Timorese?” They described themselves as “barefoot people,” from the Portuguese term indicating unassimilated native Timorese. They regarded themselves as strongly nationalist. They were very proud that after fighting for independence for years, they ultimately did become an independent nation.

Since 2002, the national languages, as spelt out in the constitution are Tetum and Portuguese; the working languages are Indonesian and English. The national language choice is tied to economic, cultural, and political interests of power holders. In Timor-Leste, Portuguese was chosen as the national language for complex reasons. On the one hand, as Molnar’s (2010) critiqued in *Timor Leste: Politics, History, and Culture*, the choice of Portuguese favors political

elites who master Portuguese, but ignores the majority of the population who cannot speak Portuguese. The national language has nothing to do with interests of Timorese people who are governed, but benefits people who govern.

Although native speakers of Tetum mix some Portuguese words and phrases into their daily conversation, many are not fluent in Portuguese. On the other hand, as Joel Maria Pereira (August, 2014), the media advisor to Timor-Leste's deputy prime minister, said, "Timor-Leste also thinks about the political side." When Timor-Leste was invaded by Indonesia, only two countries stood out to protest the invasion: Portugal and Singapore.

In daily conversation, Tetum, mixed with Portuguese, is used by the majority of population. Although the medium of instruction in schools is Portuguese, few teachers are qualified to teach Portuguese, according to interviewees. Suzana Cardoso (August, 2014), the Director of FFM (Media Trust Fund Foundation) remarked, "The government provided teachers with trainings to enable them to teach official languages and scientific knowledge, but many of teachers are not qualified to teach students since they are not very clear about languages themselves." The Ministry of Education created the National Institute for Training of Teachers and Education Professionals (INFORDEPE) in January 2011 in an attempt to equip teachers with academic qualifications (Government of Timor-Leste, 2012). Interviewees said that the training was apparently not effective because "many primary students cannot read in any language" (Cardoso, August, 2014).

For the media, the choice of language is a significant and sensitive issue reflecting the language policy and deliberation that a country has chosen. The

issue is not only about audiences—the media target; it also has the political, social, and ethical dimensions (Rowe & Wright, 2001). In Timor-Leste, the largest audience would be for content in Tetum, the mother tongue. It is also regarded as key to distinguishing Timorese from Indonesian, which was imposed on Timor-Leste while Indonesia occupied the country.

Tetum programming on television, however, is miniscule. There is only one national television broadcaster—Radio-Televisão Timor Leste (RTTL). The one must-watch program is the 8 p.m. newscast in Tetum. The news airs again in Portuguese. No commercial advertisements are allowed 15 minutes before the news and 15 minutes after the news. The 15 minutes of news in Tetum is the only Tetum content for the day. Although media advisor Pereira (August, 2014) said the government intended to focus on how to develop maintain their national identity, an objective observer can only conclude that RTTL does not emphasize the Timorese national identity. Some interviewees explained that the major reasons for this situation included lack of motivation for producing high-quality programs, ease of receiving signals from Indonesia, and lack of personnel trained to produce high-quality programs (Filipe, August, 2014).

Timor TV re-broadcasts programs from Portugal, often in the Portuguese language, the language of the elites. The researcher saw hours of Portuguese dance on Timorese TV. Not surprisingly, Timorese often turn to Indonesian TV, which is culturally more proximate.

Pereira (August, 2014), the media advisor to Timor-Leste's deputy prime minister, said: "We are more concerned with the Portuguese culture, so it does make our media slightly different from other countries." Most

interviewees thought they were influenced to some degree by the colonization. When asked about their identity, they responded that it was demonstrated in Tetum, their unique language. The absence of concrete examples to show how Timor-Leste's media preserve the national identity supports the argument that social cohesion and national identity were neglected when UN and local government strongly focused on the institutional and functional components of post-conflict democratization.

Indonesian content is cheap and easily available. Because of geographic and cultural proximity, Indonesian television programs including soap operas, comedies, and cartoons are very popular across the generations in Dili, but especially among youngsters. With the long history of colonization and widespread exposure to Indonesian TV, Indonesian is widely spoken. But for those who lived through it, Bahasa Indonesia is the language of the colonizers who scorched Timor on their way out.

English is not as popular in Timor-Leste as in other countries. The advantage of adopting English in the media is the wide availability of content. But English-speaking countries such as Australia, the USA or the UK did not stand with Timor during the period when they were colonized.

In Timor-Leste the language policy appears unlikely to change, for practical reasons, notwithstanding the policy's negative impact on national cohesion. For a nation that lacks unity and cohesion, this choice of language policy is a hurdle to be overcome on its path to being a viable nation and developing a national identity. For many small emerging democracies, it is an ongoing challenge to build a cohesive nation while restoring the independence.

For Timor-Leste, protection of national identity is even more critical for building a viable state under the circumstance of dynamic interaction between local, national, and international.

Slovenia

From being a republic of the Socialist Federal Republic of Yugoslavia, Slovenia transited relatively smoothly to a democracy in 1991 (McBride & Damjan, 2011). Its tourism campaign slogan, “The Sunny Side of the Alps,” describes the most impressive progress that Slovenia achieved among the countries once part of Yugoslavia. Slovenia shares a border with four larger countries: Austria, Hungary, Croatia, and Italy. It became a UN member in 1992, at the very beginning of independence, and joined the European Union and NATO in 2004. Slovenia has been regarded as a model to those who aspire to become peaceful and democratic societies (Fedotov, 2012).

Regime Change and the Media in Slovenia

Prior to the 1990s, the media were state-owned and subordinated to the Communist Party and were quite financially successful. The political changes in 1990s profoundly affected the relationship between the media, the state, and the civil society (Milosavljević & Vobič, 2012; Zei, 2004). Under the influence of economic and political change, the role of media has evolved from state mouthpiece to privatized media (Zei, 2004). Sabrina P. Ramet and Danica Fink-Hafner, editors of *Democratic Transition in Slovenia: Value Transformation, Education, and Media*, suggested there was a “time-lag” between political system transformation and the development of political culture (Fink-Hafner &

Ramet, 2006). Additionally, the deficiency of democratic culture was mixed with the residues of authoritarianism among the leaders of parties.

Market forces conflicted with political interference as Slovenian media made the transition from state-owned to private businesses. However, the media market was still in the hands of a few local owners, instead of being “invaded” by foreign companies (Hrvatin & Milosavljević, 2001).

Media deregulation and liberalization in Slovenia, especially in the news media, began in the 1980s (Hrvatin & Milosavljević, 2001). Interviewees expressed a general opinion that Slovenia had the most westernized and strongest economy in the former Yugoslavia. Therefore, they were committed to following the Western model of the media and held the view that “there is no other form other than capitalism” (Štular, October, 2014). Like many other Eastern and Central European countries in transition, Slovenia embarked on transforming state regulation into market regulation. The government left the media to the market by discontinuing aid to the media, forcing media entities to compete for survival. Market forces started to play the main role in deciding the fate of the media. Without government subsidy, many newspapers subsequently folded in the competitive environment (Hrvatin & Milosavljević, 2001). Media deregulation prevailed, leading to discussion of the need for a framework of media law and regulation of the media sector. The first decade of the deregulated media landscape was marked by endless debates over the need for establishing media law. During that time, no consensus was reached on a media law.

Surprisingly, membership in EU did not influence Slovenia very much in terms of Europeanization and governance. Broughton-Micova (2013) attributed this to the industry's small size and the relationship between media and political powers.

Under pressure from the public and from democratization, the allocation of frequencies was deregulated. Mirko Štular (October, 2014), editor of national public service broadcaster Radio Val 202, attributed this phenomenon to two causes. First, people were eager to express themselves when the media were unfettered from authoritarian rule. Second, people desired to seize the chance to start their own business. He said that the turning point was 1990: "The number of radio stations got higher and higher, and in five to seven years, it really burst out of the radio stations, particularly as a consequence of the regulation, really." At the end of 2014, there were 86 radio stations serving a population of 2 million (Štular, October, 2014).

On the one hand, the large number of radio stations demonstrated media pluralism. On the other hand, because the cost of opening a radio station was low, the result was a "one man playing music" mode of broadcasting. This, interviewees said, did not contribute to the media democratization. They argued that a strong liberal policy was not applicable to Slovenia's case, especially given the country's limited resources. Because of the liberalization of the media market, the number of radio stations is still very high compared with United Kingdom and other developed countries. According to *The Communications Market* (2015), there were 567 radio stations in the UK in May 2015. There were about 86 radio stations, including national and regional ones, in Slovenia (Oblak, October, 2014). It shows that there were 8.8 radio stations per million

people in UK, whereas there were approximately 43 radio stations per million people in Slovenia.

Although Slovenia's media was better situated than other Yugoslavian countries in freedom and independence, issues of transparency of ownership and state funding continue to loom large (Milosavljević, 2014). The Protection of Media Plurality and Diversity of the Mass Media Act of 1994 specified the restrictions on ownership (Article 39). The owners of public media or pertaining to the public nature must publish their sources of financing and changes in stock capital at the beginning of each calendar year in the Official Gazette (Article 42). Additionally, the Law on the Protection of Competition is intended to guard against the concentration of the media (Article 43). However, the law did not translate into practice timely. In fact, the lack of sanctions for violations of the Act resulted in ineffective outcomes. The transparency of media ownership is still an issue at the time of this writing.

The National Identity of Slovenia

The national identity shared by all Slovenes contributes significantly to the sense of unity that distinguishes them from other countries, especially from Western cultures (McBride & Damjan, 2011). Slovenes see themselves as a people of poets. The rich cultural and historical heritage that distinguishes them from other countries also works to create cohesiveness. Slovenia ranked fifth in a study in 19 European nations on the basis of cultural homogeneity in similarity of cultural value orientations (McBride & Damjan, 2011).

Slovene is a national language, spoken by 2.1 million people and one of 24 official and working languages of the European Union. Since Slovene is not

mutually intelligible with the languages of most surrounding states and the media function through language, Slovenia has a small media market that is limited to the country itself. Professor Milosavljević (October, 2014) said: “As you can imagine it is difficult to sell Slovenian content abroad, including TV; not just shows, but like dramas, movies, and so on. Exporting the programs becomes impossible because of using a different language from the neighboring countries.”

However, this is not to say that Slovenia feels no influence from neighboring countries. For example, Slovenia is always under the influence of Italian and Austrian broadcasting and culture. Viewers who live near the border buy MPEG-2 decoders to access Austrian, Italian, or Croatian digital television channels (Milosavljević & Vobič, 2012). This raises concerns that the growing penetration of foreign programs could erode the national identity of Slovenia.

Language use in Slovenia media is regulated. Media industries are required to use the Slovenian language. Fear of foreign influence has engendered rules limiting the proportion of ownership shares in media companies, lest foreign owners politicize Slovenian media (Hrvatín & Milosavljević, 2001). As a result, media outlets have been concentrated in the hands of a few local owners.

Slovenia was westernized even before independence; thus the smooth transition differentiates Slovenia from other small emerging democracies. At the advent, deregulation and liberation of media prevailed in Slovenian market. Deregulation plus the fact that radio could make people’s voices heard at a low

cost led to an explosion in the number of radio stations. Therefore, Slovenia's media situation is more optimistic than others.

Macedonia

Like Slovenia, Macedonia was a part of the former Yugoslavia. Macedonia, however, differs from Slovenia in so many ways in its transition to democracy. It transited more slowly and with some bloody fights (Gunther & Mughan, 2000). Economic development lagged behind that of the Balkan region because of corruption and the weak rule of law (U.S. Central Intelligence Agency, 2014b). After 14 years of independence, Macedonia is a candidate for accession to European Union. But its dispute with Greece over the name "Macedonia" and the strained relationship with Bulgaria has put accession on hold.

Regime Change and the Media in Macedonia

Political transformation brought about liberation for the media. The Western liberal model was introduced as the foundation upon which to build the media system (Trpevska & Micevski, 2014). At the outset, the prevailing belief was that the country had no need to adopt a media law. Policy makers took the position that freedom of expression was affirmed in 1991 by the constitution and that this was sufficient for media policy. The significance of media policy to guide media development was underestimated. After extensive discussion among representatives from civil society and the academic community, the Broadcasting Law came into force in 1994.

The period between 1997 and 2005 has been characterized as having a greater degree of pluralism and freedom than exists today. When the VMRO-DPMNE party won the election in 2006, optimism about the media changed.

Media professionals interviewed for the present study said that media freedom has been curtailed dramatically since 2006 (Trpevska, October, 2014; Sekulovski, October, 2014). A new broadcasting law was drafted for the benefit of the VMRO-DPMNE party in 2007 (Trpevska & Micevski, 2014). When the researcher conducted the interviews at the end of 2014, interviewees said it was the worst time for media practitioners in Macedonia. Sükösd and Bajomi-Lázár (2003) said that “propaganda was considered the major and legitimate force of social transformation” (p. 14).

The two terms “pro-government” and “anti-government” were frequently mentioned in the interviews (Marusic, October, 2014; Stojanovski, October, 2014). In the eyes of the ruling party, consolidation of the regime is more crucial than freedom of expression. In such a small country as Macedonia, people are intimately connected with know each other and so feel that they may be reported when they criticize the government. People who criticize the government in front of others are likely to be tagged as “anti-government.” The label can affect people negatively at work and in daily life. As the researcher observed, there were many cafés, but people could not talk about politics freely in public places. Everyone has been “labeled” with different “tags” (Stojanovski, October, 2014).

More than 80% of Macedonians thought they could not trust their neighbors, according to a survey by the International Republican Institute. This suspicion was nourished by constant media propaganda from the government, which not only affected interaction between people, but also labeled individuals as undesirable citizens or public servants, leading to threats of loss of their jobs. Filip Stojanovski (October, 2014), a program director at Metamorphosis

Foundation, told the researcher: “Basically, it is this atmosphere of fear, and this term is called the *spiral of silence* in sociology. We are now at probably the worst stage of this *spiral of silence*. Moreover, the atmosphere of control from the political parties is over the lives of the citizens.”

He also pointed out that the Metamorphosis Foundation’s project was a media fact-checking service, which focused on examining current work of the media in Macedonia. Additionally, the Foundation provides expert opinions by experienced journalists and other analysts on what is done and what should be done in order for media to be the real guardians of democracy. His approach was basically to bring knowledge to people and facilitate connections among people. He noticed that people always felt isolated from the larger world and they had only very small and closed networks. Although Macedonia has been a democracy for more than 20 years, the environment for free public discussion and the access to public information is still not satisfying, according to interviewees’ reports.

The National Identity of Macedonia

National identity is a confusing concept to Macedonians, compounded by the “naming dispute” with Greece, which challenged the country’s right to call itself Macedonia. Greece demanded that the country’s name includes a qualifier such as “North Macedonia,” to avoid confusion with a region in Greece called Macedonia. (The larger and busier airport had been renamed the Skopje Alexander the Great Airport in 2006; the Greeks also protested as the Kavala International Airport in the Greek region of Macedonia had been called Alexander the Great.) The quarrel gradually escalated to international mediation, and Greece blocked Macedonia from joining NATO and EU. After a

24-year “naming dispute” with Greece, the Macedonian Prime Minister in 2015 said he was willing to reopen the conversation with Greece (Smith & Kingsley, 2015).

To enhance its national identity, in 2011 the Macedonian government built a monument consisting of a fountain with a statue of Alexander the Great in Skopje’s Macedonia Square. It led to controversy. Some thought it did not enhance the national identity but rather benefited government cronies, because the project was costly (Babunski, October, 2014). Some pointed out that “the national identity should be demonstrated in the economic progress and the well-being of citizens instead of the monuments” (Petkovska, October, 2014). Others felt humiliated that this conspicuous luxury should be advanced to promote the identity of a country with high unemployment and poor economic conditions (Georgievski, October, 2014; Sekulovski, October, 2014).

Some interviewees harshly criticized the investment in building projects. Biljana Petkovska (October, 2014) said, “Such glamorous buildings and sculptures are ironic, because unfortunately we cannot brag a lot about our healthcare system, our social benefits, and other necessities that we are receiving from the state. The level of poverty is quite high.”

Given the current situation, Dr. Klime Babunski (October, 2014) concluded: “The government is making totally unimportant things important, and important things unimportant.” This reflected disappointment of the government in not effectively promoting the identity of Macedonia. However, another group admired the government’s strategy. As Dragan Sekulovski, the executive director at the Association of Journalists of Macedonia (AJM)

observed, “We have two groups of people, one of them harshly opposing this, and they are quite aware of the whole idea, the expense to the economy, and other targets. The other group [is] completely admiring the whole concept. And this is not good because it fosters the division between the people even more.” In Macedonia’s case, monuments cannot represent its identity as expected by the government. Based on the evidence from the fieldwork, the media’s role in emphasizing identity to protect the means and ends of such a small country is missing.

Language use in Macedonia is regulated in the Constitution. Macedonian is the official language throughout the Republic of Macedonia. Albanian, spoken by about 27% of the population, is also an official language used in the parliament and the municipalities. Albanian community is the second biggest ethnic community in Macedonia (Trpevska, October, 2014). In terms of the media, language use is quite diverse to serve different ethnic groups in Macedonia. Nearly every ethnic group— Bosnian, Roman, Bulgarian, Croatian etc.— uses its own language in its private media (Trpevska, October, 2014). In this circumstance, people are confused in their identity. That it leads to a splintering of the media market. As remarked by Dr. Trpevska (October, 2014), Macedonia is different from America, a melting pot. It includes diverse ethnic groups, which have their own traditional and cultural heritage. Interviewees conveyed that “we are confused with our identity and it is really tough to find the mechanism to protect our national identity (Georgievski, October, 2014).”

Discussion

This chapter opened with Bhutan, whose national identity is partly based on the concept of GNH—Gross National Happiness—an idea that helps guide media policy. From “landlocked” to “land-linked,” Bhutan is faced with more and more temptation from the materialistic world, whose values conflict with the Bhutanese ethic reflected in GNH. As increasing volumes of media content contradict the values of GNH, that country’s media must follow the principle of GNH and play a more conscious role in regard to imported programming. Bhutan presents a special case in how democratization took place and how national identity shaped the way media policy was drafted. As democracy was introduced by the former authoritarian leader, media was encouraged to inform people and played the role as a watchdog. The political environment was conducive for media development. However, the social environment for the other three countries are not as favorable as that in Bhutan, although they are all small emerging democracies.

Media serve to protect national identity in any country. However, in small emerging democracies, where regime change took place not long ago, with restraint of size, it was not an easy task to protect national identity. The regime change always was accompanied with market change, which also shapes the way media policy is formulated.

Language and history are the major factors of the national identity (Smith, 1991, p. 14). For small emerging democracies, the national identity is essential in maintaining their existence. Media play an important role in protecting national identity, especially in the countries faced with sudden social

and political change. In small emerging democracies, the path of democratization influenced how media were developed and how media policy was formulated. Furthermore, whether the media emphasized the national language also influenced the sense of national identity. It is very difficult to imagine how one could examine the media policy without reference to the history and language use. The important lesson learned from these countries is that media policies and regulations are shaped by the path of democratization of the given country and language use in that media market in the following ways:

The regime change provided room for media to grow as the states liberalized their media markets at the outset of democracy. This applies to the four countries studied. There is a necessity to nurture and inform citizens. Media development in the four countries took different ways as the governments reacted differently towards the media. The Bhutanese government promoted private newspapers before the first election so as to nurture citizens to realize their rights in a democracy. Influenced by the Western countries, Slovenia and Macedonia followed the Liberal Model immediately after they embarked on democratic transformation. Additionally, the governments stopped subsidizing the media and left them to the market-oriented economy. Deregulation prevailed among the Eastern and Central European countries in transition. To avoid having media ownership fall into foreigners' hands, the media market in Slovenia remained in the hands of local owners. In Timor-Leste, which was faced with international pressure and internal crisis, the application of the Western model in the media market was not as evident as seen in the other three countries. Because of the difference in the cause of regime change, Timor-Leste suffered from lack of communication

infrastructures and “know how” in establishing their media. Moreover, the heavy reliance on international organizations and donors led to difficulty of being independent and sustainable.

The path of democratization taken by the government determines the development of the media. The four countries in the present study show three paths of democratization. The peaceful top-down transition taken by the Bhutanese government provided favourable conditions for the media. The Royal Government of Bhutan promoted private newspapers before the first election so as to nurture citizens to realize their rights in a democracy. The second path is exemplified by Timor-Leste, where the change was neither peaceful nor top-down but where international organizations played an influential role in the regime change. Communication infrastructure was poor because of the turbulent history. The government prioritized economy development and enhancement of national cohesion. Slovenia and Macedonia were part of Yugoslavia and became independent when Yugoslavia fell apart. They were mostly influenced by Western values and the way in policymaking. They both liberalized the media market at the advent of democratic transformation and faced the question of the necessity of media law. They did not recognize the Liberal Model learnt from the Western world would not work as well as where it was born. It raised questions of media’s sustainability and financial independent, which will be further discussed in Chapter 5.

The language use reflects the degree of protection of national identity and the political purposes. The four countries differed in the degree of preserving their national languages. This also was reflected in language policy and media content. Bhutan protects its national identity by creating media

content in the national language and applying GNH in maintaining sovereignty and uniqueness. Timor-Leste took the political side in consideration when deciding language policy, while Slovenia set clear guidelines in using Slovene in media. Macedonia uses multiple languages as official languages in the parliament and the municipalities. It also led to some confusion about their national identity among citizens.

However, the differences in appearance cannot cover the similarities in nature that arise when cultures are faced with a sudden social and political change. The reaction of small emerging democracies tends to have patterns. According to their distinctive backgrounds, they show these patterns to different degrees (Table 4.1).

Table 4.1

National Identity and Media Policy in the Four Countries

COUNTRY	NATIONAL IDENTITY	REGIME CHANGE	MEDIA DEVELOPMENT & POLICY
BHUTAN	<ul style="list-style-type: none"> • Bhutanese traditional values • The well-known concept of GNH 	<ul style="list-style-type: none"> • From monarchy to democracy • From closed market to open market • Fragility and lack of recognition of democracy 	<ul style="list-style-type: none"> • Press media boom • Media transfer different values from outside world • Media policy prioritizes GNH
TIMOR-LESTE	<ul style="list-style-type: none"> • Dynamic interaction between local, national, and international 	<ul style="list-style-type: none"> • The mixture of international pressure and internal crisis • Fragility and instability 	<ul style="list-style-type: none"> • Restoring hardware constructions with consideration of the lack of unity • Problematic language policy

	<ul style="list-style-type: none"> • Turbulent history and unstable political context 	<ul style="list-style-type: none"> • Lack of unity and cohesion 	
SLOVENIA	<ul style="list-style-type: none"> • Rich cultural and historical heritage • Full membership of EU 	<ul style="list-style-type: none"> • From communist country to democracy • Strong integration between media and political elites 	<ul style="list-style-type: none"> • Too many radio stations • Deregulation and liberation of media • Questioning the necessity of media law • Strict language policy
MACEDONIA	<ul style="list-style-type: none"> • Naming dispute with Greece • Candidate of EU membership 	<ul style="list-style-type: none"> • From communist country to democracy • VMRO-DPME election won in 2006 • Strong integration between media and political elites 	<ul style="list-style-type: none"> • Deregulation and liberation of media • Questioning the necessity of media law • Reduction of media freedom since 2006

With regard to economic condition in small emerging democracies, it is challenging for their media to sustain and survive. Constrained by the small size, shortage of resources, and the incipient stage of economic development, media have to figure out how to play a functional role in fostering democracy under such economic circumstances, which are not comparable to their counterparts in developed countries. Chapter 5 will elaborate on the media economics in small emerging democracies where the smallness of market relates to the survival and sustainability of the media.

CHAPTER FIVE MEDIA ECONOMICS IN SMALL EMERGING DEMOCRACIES

For small emerging democracies that have recently experienced regime change in which the economy has been less than satisfactory and the political environment is unstable, media have been expected to play an important role in consolidating the new democracy. Much as governments and citizens are aware of the critical role of media, in the four selected countries, the survival of the media was under threat. The independence of media struggling to survive is questionable. The economics of the media in small emerging democracies therefore plays a crucial part because the smallness of market bears strongly on the survival and sustainability of the media.

This thesis adopts the position that for media to play a functional role, whether in fostering democracy or promoting national development, the media must be financially independent (Psychogiopoulou, 2014). It is possible to have newspapers that are funded by the government, as happens in China, but such a model would be difficult to defend in theory and to apply in practice. An important related issue is that emerging democracies are often not as wealthy as advanced democracies. Doyle has suggested that the level of advertising expenditure is positively associated with economic wealth in any country (2002, p. 48). Small emerging democracies have a lower level of national advertising expenditure compared with their counterparts in developed countries.

Media policymaking is a process of analyzing media development and policy responses by various approaches— social, cultural, and political and

economic (Picard, 2011a). Through this approach, the characteristics of media markets in small emerging democracies are explored in light of similarities and differences among them, addressing and positing answers to RQ2:

How does media economics shape media policy in small emerging democracies?

In this case, media economics is used as the means of providing available alternatives in the present context to achieve the ultimate desired policy outcomes: making media financially independent and ensuring that media can play a functional role in the developing democracy.

Key Economic Characteristics of Media in Small Emerging Democracies

Throughout the past three decades, media economics has become an identifiable field of study. It combines the principles of both communication and economics with examination of them in applications in media firms (Alexander, Owers, Carveth, Hollifield & Greco, 2004, p.4). The term “media economics” has been defined from different perspectives as it is broad and covers so many aspects. From the perspective of “allocation,” it is concerned with how the media industries allocate resources to create content to meet the needs of audiences and advertisers (Picard, 1990). From the perspective of “business,” it refers to business operations and financial activities of various media industries.

As the present study focuses on small emerging democracies where small media market is the salient precondition for media industries, the term “media economics” here focuses on the scale economies, characteristics of media market, the relationship between different actors, and product

distribution. The reason is that small size of small emerging democracies only relates to a few aspects of the term “media economics.” For example, a small population means fewer audiences, fewer viewers, fewer listeners etc., but with the same cost of media products, especially the first-copy cost. This raises the question of financial sustainability of media industries in these countries. With emphasis on characteristics of small emerging democracies, only related aspects of “media economics” will be discussed and analyzed in the present thesis.

Why is media economics so special? Commercial media have “dual products”: content and audience. For many media companies, audiences are the main currency, because the access to them can be priced, packaged, and sold to advertisers (Doyle, 2002). In this sense, small markets with smaller audiences have an inherent disadvantage.

Advertising is a major source of revenue for many media companies (Doyle, 2002). Most media companies rely partly on the sales of advertising content and partly on the sales of audience exposures (Hoskins, McFadyen, & Finn, 2004). This gives advertisers considerable power to influence the content of media by threatening to discontinue their business. Almost 90% of editors at U.S. daily newspapers reported experiencing pressure from advertisers and 37% reported capitulating to advertisers’ pressure (Soley & Craig, 1992). This phenomenon is worse in small emerging democracies and observably so in the countries studied because the governments were among the biggest advertisers. This poses the question of how media can maintain independence, both financially and politically. The conflicted role of the government in one market, both as an advertiser and a regulator, gives rise to the questions on editorial ethics and integrity. On the one hand, media are eager to play the role of a

watchdog to the government; on the other hand, media freedom shrinks commensurately with the financial weakness of media found in most emerging democracies.

Encouraged by deregulation and democratization of media, the number of media industries in the four countries increased quickly at the advent of a new regime. Given what one now sees as struggling media organisations, why then were they started? This posed an initial concern: how can an industry survive against so many media competitors but such limited audiences? At the outset, media in these small markets seem doomed to fail financially. That many businessmen embarked on media industries was not incidental. This happened at the advent of independence when the media were disentangled from the authoritarian government. The reasons of newspapers' downfall were complex, ranging from financial and political to staff-related ones (Hrvatín & Milosavljević, 2011). First, driven by profit and enthusiasm for a democracy, businessmen would not know they were at the high risk of failure prior to entering and saturating the market. Second, because media legislation had yet to adapt to the new circumstances, the time lag of legislation made the media business lucrative business for a while. The legislative lag, however, also resulted in opaque media ownership and eventually caused concentration of the media. Without any restrictions, supervision, and sanctions, these malpractices could not be arrested. The media legislation in the countries studied will be discussed in detail in Chapter 6.

The small size of the media audience means that the industry's revenue will be small. Compounding the problem is a high first-copy cost that characterizes the media industry (Picard, 2011b). First-copy costs of a given

service tend to be equal, regardless of audience size and or so, *ceteris paribus*, economies of scale apply, as larger audiences mean more revenue. In other words, the first-copy cost of a newspaper in a small country with 2 million people does not differ from the cost in a large country with 20 million people. With larger audiences, media companies in a big market are able to spread the first-copy cost over more customers (Straubhaar, LaRose & Davenport, 2014). As the audience of media products expands, marginal returns will be enjoyed (Doyle, 2002). Any additional paying consumer of the media product adds to the profit. Yet in small states, this is very difficult to realize.

Profits come from overcoming the fixed costs. After that, the larger a media market, the larger the profit for media companies; conversely, the smaller the media market, the smaller the profit for media companies. As concluded by Straubhaar, LaRose, and Davenport (2014), “Economies of scale result when unit costs go down as production quantity increases.” Economies of scale matter critically. Like first-copy cost, the overhead costs in providing a service tend to be equal too. In the economic context of small countries, especially for those that have a large number of media outlets, the difficulty in achieving economies of scale is an inherent disadvantage.

Economies of scope are also a common characteristic of media industries. They may be gained by multi-product production and are always associated to large-scale distribution, advertising, and purchasing (Lipsey & Chrystal, 1995). This is an effective way to gain savings and efficiencies by making use of one product in different forms. For example, an interview could be recorded, reformatted, and repackaged into a radio program or news program to give rise to economies of scale. Media industries in the selected countries are

small-scaled and, because of small audience size, are not associated with large-scale distribution. It is still unclear whether economies of scope could be achieved in the context of small emerging democracies. This chapter will delve into this question through the case study.

Generally speaking, the globalization and digitalization of media markets provide great opportunity for media companies to exploit economies of scale by expanding product sales to overseas markets. Additionally, there are three major strategies by which media companies may grow: *horizontal*, *vertical*, and *diagonal expansion*. In general, the supply chain of media comprises creation of media content, packaging media content, and distribution. Given this chain, *horizontal expansion* refers to an advantageous strategy that allows firms at the same stage of supply chain to expand their market share and ultimately gain economies of scale (Doyle, 2002). This creates an expansion of existing operations, rather than establishing new ones. *Vertical expansion* means that expansion goes either forward to the succeeding stages or goes backward to the preceding stages. *Diagonal expansion* develops the business diagonally into different areas. For instance, a newspaper publisher could expand diagonally into television broadcasting. The advantage of such integration is that it can make good use of specialized resources and expertise across different sorts of products and help achieve economies of scale (Doyle, 2002).

The present study will consider the feasibility of these expansion strategies and whether they are realistic in small emerging democracies. Although integration between different stages of the supply chain and different areas of the media business is theoretically feasible, given the small size and

unstable economic condition of small emerging democracies, one or another of the strategies may be difficult to accomplish. This will be specifically discussed in media industries in each country's scenario.

Another concern arising from small emerging democracies is that the market's small size will restrict the diversity of media products. As observed in Chapter 2, it is almost impossible for small states with limited resources to afford diversity of output. Where media products are concerned, diversity in content is a "luxury" for small states (Puppis, 2009).

The diseconomies of scale existing in small markets suggest that if market failure is inevitable, policymakers must take corrective countermeasures. Such an intervention, however, raises questions as to what extent that the media can play its watchdog role in promoting democracy.

This section focuses on concerns in media economics for each of the four countries. Based on interviews and analysis of secondary data, the researcher delved into the common causes of the countries' current situation and whether any differences exist. The ultimate research goal is to provide alternative strategies to meet the desired policy outcome: ensuring a functioning role of media in small emerging democracies.

Concerns of Media Economics in Small Emerging Democracies

From the observed phenomenon of media's unsustainability, the researcher realized concerns of media economics in these countries are rooted in relationships between the state, market players (media companies), and audiences.

The state's entire economic condition largely decides the budget that may be channeled to media. It also determines citizens' purchasing power in buying media devices and consuming media products. In general, emerging democracies, whether large or small, are not economically strong. As illustrated in Table 5.1, Bhutan and Timor-Leste ranked at 168 and 166 respectively in GDP (U.S. Central Intelligence Agency, 2014a; U.S. Central Intelligence Agency, 2014c). Timor-Leste ranked at 163 in per-capita GDP, the lowest rank among the four countries (U.S. Central Intelligence Agency, 2014c). Slovenia and Macedonia, once communist countries, transited to capitalism in 1991 but with very limited wealth (Tunstall, 2008). Nevertheless, Slovenia had the strongest economy compared with other countries that used to be part in the former Yugoslavia. Macedonia's economic development has lagged behind the Balkan region, because of the country's the weak rule of law (U.S. Central Intelligence Agency, 2014b).

Table 5.1

Comparison of GDP and GDP-Per capita among Four Countries (in USD)
(U.S. Central Intelligence Agency, 2015a, 2015b, 2015c, 2015e)

Country	GDP in US\$ billion (purchasing power parity) (2015 est.)	Country rank in world	GDP - per capita (PPP) (2015 est.)	Country rank in world
Bhutan	\$6.383	168	\$8,200	148
Timor-Leste	\$7.101	166	\$5,800	163
Slovenia	\$63.6	100	\$30,900	58
Macedonia	\$28.89	131	\$14,000	114

For Bhutan and Timor-Leste, low purchasing power resulted in low consumption of media products. In remote areas, many still have no access to

any form of media. According to the *Timor-Leste Communication and Media Survey* (Soares & Dooradi, 2011), only 61% of households in that country owned a mobile phone. The survey found that 45% of people thought the phone was too expensive, while 56% said the service cost too much (Soares & Dooradi, 2011). Half of the population earned less than US\$10 per month when the survey was conducted in 2011, but the price of a newspaper was US\$1 a copy. In 2012, the minimum nominal monthly wage was raised to US\$115 (International Labour Organization, 2013). Low purchasing power was considered the primary reason for low sales of newspapers (International Labour Organization, 2013). Interviewees reported that their family members could not afford the price of a newspaper. Perhaps just as importantly, no widespread reading habit had been established in Timor-Leste (Soares & Dooradi, 2011).

The time-lag in legislation is a given in any country, but when it comes to media in small emerging democracies, it has profound implications. During the transition phase towards democratization, the four selected countries focused on consolidating the respective new regime. Deregulation and liberalization of the media prevailed, leading to free entry into the market. Media were finally disentangled from the authoritarian regime, and entered the free market and adopted the “watchdog” role. However, the presence of many media companies worked against financial viability. The media in Bhutan, Timor-Leste, and Macedonia could not survive without the state advertising that had formed a major source of their revenue. In the absence of financial independence, the influence of the political power was amplified. Slovenia did not rely on state advertising as much as the other three countries, for it was

Westernized even before the independence. It is the most progressive country in economic and political development among countries that were part of the former Yugoslavia. The dominant role of the government will be discussed in detail in the sections addressing each country.

Literacy, a prerequisite for consumption of press media, was and is low in both Timor-Leste and Bhutan; Slovenia and Macedonia have high literacy rates even among European countries (99.7% and 97.4%, respectively) (UNICEF, 2013). The Timorese literacy rate was 64.07% in 2015 (UNESCO, 2015), while Bhutan's was even lower at 52.8% (Ministry of Information and Communications, 2013). Unlike the two European countries that are rich in reading culture, Bhutan and Timor-Leste have barely established the reading habit.

In this chapter, various factors contributing to the media economic dilemma will be explored. Nevertheless, four small emerging democracies, differing in national identity and historical contexts, reflect these factors in similar ways.

Media Economics in Bhutan

Overview of Media Market in Bhutan

Bhutan is marked by its diverse media outlets, almost all of which are centered in the capital city, Thimphu, whose population is 100,000 (Ministry of Information and Communications, 2015). *Kuensel*, the first government bulletin, was founded in 1967 and was the only national newspaper of Bhutan until 2006, when, in line with democratization, *Bhutan Times* and *Bhutan Observer* were launched. The Bhutan Broadcasting Service (BBS) radio

launched its broadcasts in 1973. With the introduction of television channels in 1999 by BBS TV, the media landscape became diverse and robust. Internet services were also introduced in 1999; as of 2013, Internet subscribers totaled 349,116 (Ministry of Information and Communications, 2015). To bridge the digital divide between rural and urban dwellers, the government built 185 community centers with Internet facilities by March 2015 (Dorji, 2015).

According to the 2015 *Annual Info-Comm and Transport Statistical Bulletin*, there were 11 newspapers, seven radio broadcasters, one television station, and six magazines, all based in Thimphu (Ministry of Information and Communications, 2015) (See Table 5.2), but on closer investigation, that most of these private media companies are on the verge of closure. Senior government official Dorji said that “if forcing some of newspapers to close is good for the future, it is worth doing so, and it would also benefit media in the long run” (June, 2012).

Table 5.2

Media Landscape in Bhutan (Ministry of Information and Communications, 2015)

Media	Title	Date Started	Number
Print Media	Kuensel	1967	11
	Bhutan Times	30 April, 2006	
	Bhutan Observer	2nd June, 2006	
	Bhutan Today	30 October, 2008	
	Business Bhutan	26 September, 2009	
	The Journalist	20 December 2009	
	Druk Nyetshuel	29 August 2010	
	Druk Yoezer	19 February, 2011	
	Druk Gyalyong Sharshog	12 November, 2011	
	The Bhutanese	21 February, 2012	
	Druk Melong	20 May, 2012	
Radio	Bhutan Broadcasting Services (BBS)	November, 1973	7
	Kuzoo FM	1 September, 2006	
	Radio Valley	12 April, 2007	
	Centennial Radio	21 September, 2008	
	Sherubtse Community Radio	8 May, 2009	
	Radio High	5 August, 2010	
	Radio Wave	10 December, 2010	
TV	Bhutan Broadcasting Services (BBS): BBS 1 and BBS 2	2 June 1999	1
Magazines	Yewong	1 October, 2009	6
	Druk Trowa	November 2009	
	Student Digest	October 2010	
	Bhutan Timeout	11 April 2012	
	Voyager	9 August 2013	
	The Raven	October 2012	

Table 5.2 shows the diversity of media for a small country with population of about 798,000 (U.S. Central Intelligence Agency, 2016). Editors and journalists interviewed expressed their concern about the future of their media organizations because the competitive environment meant that virtually all are in the red. One of the most influential newspapers, *Bhutan Observer*, the first private bilingual newspaper, discontinued its print version after 1 August 2013 because of its unsustainability, but kept an online version. On the same day the *Bhutan Observer* ended its print version, the first editor-in-chief, K.B. Lama, published an article in the online version of the *Bhutan Observer* titled “Private Media in Death Throes” (Lama, 2013). He wrote:

If the decision of *Bhutan Observer* to close down its print version is anything to go by, then it’s obvious that the disease is indeed deeper than just temporary ailment. Most of the newspapers in the kingdom are only just surviving, by resorting to such measures as downsizing its editorial and other relevant divisions.

The *Bhutan Observer* and *Bhutan Times* were launched in April and June of 2006 respectively, before Bhutan became an independent democracy. The *Bhutan Times* was the first private newspaper, starting the first edition with an exclusive interview with Jigme Khesar Namgyal Wangchuck, the prince of Bhutan at that time. Because of its business difficulties, it became an online weekly from 24 May 2015. The two publications were the first private newspapers that generated the free and fair discussion in order to bring about informed decisions (Lama, 2013). In such a competitive business environment, the *Bhutan Observer* and the *Bhutan Times*, together with other newspapers, were trapped in unsustainability. The *Situation Assessment of Journalists in*

Bhutan, a report by the Journalists Association of Bhutan, stated that private newspapers were on the verge of bankruptcy because they were reliant on government advertising that had been negatively affected by the government's budgetary deficit since 2012 (Journalists Association of Bhutan, 2014).

Figure 5.1 The Number of Media Outlets from 2006 to 2014 in Bhutan
(adapted from Bhutan: Freedom of the Press 2006-2014)

Figure 5.1 shows media development, especially among the press media, from 2006, the infancy of media, to 2014. The number of newspapers gradually increased, even as some folded from economic difficulties (e.g., *Bhutan Youth*). Despite the national public service broadcaster, started in 1973, six private radio stations were launched from 2006. The state-owned television network, Bhutan Broadcasting Services (BBS), was the only television broadcaster with two channels, BBS1 and BBS2. The overall financial fragility continues, posing challenges to private media enterprises in Bhutan.

Role of Government in Media Market

The dominant position of Bhutan's government was vividly by the case in which government advertising accounted for 85% to 90% of newspapers' total revenue. What caused the heavy dependence on the government advertisements? First, the low circulation of newspapers did not attract advertisers. Second, private enterprises felt no need for advertising. In Bhutan, the major business mode is business-to-business; for the individual consumer, word-of-mouth advertising is felt to suffice (Vucinic, 2014).

In 2012, when data were being collected by the researcher, government advertising in newspapers was handed out on a rotation basis, regardless of circulation. Newspapers did not compete for more advertisements; instead, they waited for the allocation from the government. Perhaps more importantly, the lack of circulation auditing made it difficult for advertisers to know the reach of their advertisement (Tshering, June, 2012; Norbu, June, 2012; Tenzin, June, 2012). Dasho Kinley Dorji, the permanent secretary of the Ministry of Information and Communication, said, "Advertisers should know which media reaches the targeted audience and the circulation audit will help them find that out (*Bhutan Observer*, 2012)."

If media's financial sustainability and viability was under question, there was no possibility for function as a watchdog of the government (Vucinic, 2014). The existence of a real market was raised by a private newspaper owner (Wangmo, 2012). According to the report of the Ministry of Finance, the adspend was 59.34 million BTN (US\$950,000) in the fiscal year 2011-2012 (Figure 5.1). More critically, the figure published by the Ministry of Finance was less than the actual amount of money allocated to newspapers (Vucinic,

2014). The total amount received by nine newspapers in operation at that time amounted to 124.3 million BTN (US\$2 million) (Vucinic, 2014). It implied that the government did not keep a good record of the real official government spending on advertising. Unfortunately, the researcher was unable to obtain more accurate data. In 2013, adspend rose slightly, to 64.56 million BTN (US\$1.03M). It decreased to 54 million BTN (US\$865,000) in the year 2013-2014 (Figure 5.2). Based on the report of the Ministry of Finance's, only 43.8 million BTN (US\$700,000) was actually spent on advertising. The total amount was tiny compared with other countries, but in fact, there was much more money channeled from the government to newspaper advertising.

Figure 5.2 Bhutanese Government Adspend 2011-2014 (in million BTN)

(Vucinic, 2014)

Notably, there were no criteria for the government advertisements' allocation. Instead, advertisements were placed equally on a rotating basis without accounting for circulation of newspapers. In order to frame a clear advertising policy to set criteria for allotment of advertisements, the Ministry of Information and Communication (MoIC) initiated the first press media

circulation audit in November 2010. However, many newspapers opted out of the audits because of concerns about fairness. Nevertheless, *Kuensel*, the incumbent “government newspaper,” and the *Bhutan Observer* opted for the circulation audit in 2010. In the February 2014 circulation audit, a total of eight newspapers opted for the audit but three of these were not auditable (Pem, 2010; Dorji, 2014). The result of the 2014 newspaper circulation is displayed in Table 5.3. The newspaper circulation and reach audit was conducted by the Department of Information and Media with the collaboration of the Audit Bureau of Circulations (ABC) in Mumbai, India.

Table 5.3

Newspaper Circulation Audit in Bhutan in February 2014 (Tshering, 2014)

Newspapers	Frequency of Publication	Result
Kuensel	Daily	7,159
The Bhutanese	Daily	1,712
Kuensel’s Dzongkha	Daily	1,300
Bhutan Today	Bi-weekly	1,291
Business Bhutan	Weekly	848

The fear of Bhutanese private newspapers has its root in advertising policy. Firstly, the auditing body should be independent, trustworthy and reliable. For example, ABC Singapore is a non-profit organization and it is a member of International Federation of Audit Bureau of Circulations (IFABC) (ABC, 2012), unlike Bhutan’s auditing body (See Table 5.4). More importantly, ABC Singapore is well accepted by industry because of its truthfulness and professionals. Conversely, the government-associated body of auditing might raise the question of fairness and impartiality. Secondly, ABC Singapore

conducts auditing by using a standard, while the MoIC does not provide any directives. Last but not least, ABC Singapore issues the certificate to media companies that participate. However, private newspapers in Bhutan, especially the small private ones are afraid of being disfavored by the government in advertisements. As circulation audit is not mandatory for newspapers, many private newspapers in Bhutan opted out.

Table 5.4

Circulation Audit of Press Media in Singapore & Bhutan (ABC, 2012)

Country	Audit Organization	Nature of Audit Organization	Basis of auditing	Year Started
Singapore	Audit Bureau of Circulations Singapore (ABC)	Not-for-profit organization	Standard audit procedures	January 2007 (established in 1984 as Media Circulations Services (MCS))
Bhutan	Department of Information and Media (DoIM) of the Ministry of Information and Communications (MoIC)	Ministry	No directives	2010

The dual roles of the government are conflicted in Bhutan, which threatens young private media in terms of impartiality and reliability. As the biggest advertiser in Bhutan is the government, the outcome of circulation auditing largely determines the amount of allocation of advertisements from the government. In contrast, ABC Singapore aims to protect advertisers, advertising agencies and the subscribers from false claims (ABC, 2012).

Media Economics in Macedonia

Overview of Media Market in Macedonia

The environment for Macedonian media is not optimistic either. According to the latest report of *Freedom of the Press 2016* by Freedom House (2016), Macedonian media freedom declined from “partly free” to “not free.” This decline was primarily due to corrupt ties between media owners and political interests, threats and attacks on media professionals, and more seriously, government wiretapping journalists on a large scale (Freedom House, 2016). These phenomena have been manifest in Macedonian media market where the government took control over media. The corrupt ties between media and political interests became the major obstacle for media to gain an independent role.

There were more media outlets at the beginning of independence from former Yugoslavia in 1991 than currently. With the relaxation of the licensing regulations on commercial broadcasting upon independence, many commercial broadcasters popped up (Broughton-Micova, 2014). The number of broadcasters at independence was estimated to reach 250 at that time. But they began to close as they became financially unviable. By May 2016, there were 55 TV stations, 31 radio broadcasters, and seven newspapers, according to the state Agency for Audio and Audiovisual Media Services (AAAVMS, 2016). Table 5.5 paints the media landscape in Macedonia in 2015. According to Dr. Snezana Trpevska (October, 2015), a senior lecturer at the Institute of Communication Studies, the total circulation of all newspapers was about 60,000 to 70,000 in 2015.

Table 5.5

Media Landscape in Macedonia (BBC News, 2015)

Media	Title	Ownership	Note	Number
Press	Dnevnik	Private	Daily	7
	Vecer	State-subsidized	Daily	
	Urinski Vesnik	Private	Daily	
	Nova Makedonija	State-subsidized	Daily	
	Vest	Private	Daily	
	Lajm	Private	Daily (in Albanian)	
	Forum	Private	Weekly	
Television	MTV	State-owned	3 national networks and satellite network	5
	Sitel TV	Private	National	
	Kanal 5	Private	National	
	Telma	Private	National	
	Alsat-M	Private	National (in Albanian)	
Radio	Macedonian Radio	State-owned	National	4
	Kanal 77	Private	National	
	Antenna 5	Private	National	
	Metropolis Radio	Private	National	

Government exerted a bigger impact on media outlets than the overall economic condition of this country. Indeed, the close association between media ownership and political control raised the problem to a new height. Macedonian media profitability deteriorated with the adverse political

environment. At an individual level, media professionals were poorly paid and faced more threats than ever before (Georgievski, 2015).

Besides the large number of media outlets, the small audience size made survival even harder. The saturated media market raised the issue of how to achieve media sustainability. In the *Europe and Eurasia Media Sustainability Index 2015* (Georgievski, 2015), Macedonian media was regarded as an unsustainable media system (see Figure 5.3). The assessment tool included five objectives in shaping a sustainable media system:

- 1) Free speech is protected in a good social and legal environment,
- 2) Journalism meets the professional standards,
- 3) Plurality of news sources provide citizens with reliable news,
- 4) Media enterprises are well-managed, and
- 5) Supporting institutions function in a good manner.

Figure 5.3 Media Sustainability Index: Macedonia (2010-2015) (Georgievski, 2015)

Based on the six-year media sustainability index (See Figure 5.3), Macedonia had made considerable progress in terms of supporting institutions and plurality of news sources. Improvement was witnessed in other objectives except the business management. However, there was no objective associated with economics standard in the Media Sustainability Index. In fact, financial sustainability is a critical objective in shaping a functional media system. Given the backdrop of economic degradation in the last few years, media enterprises inevitably were trapped in dismal financial conditions. Many journalists were not well-paid, even unpaid. Some emerging media outlets folded because of political pressure. As analyzed in the report on the *Media Sustainability Index 2015* (Georgievski, 2015), the unsustainability of Macedonian media was the result of a combination of factors, including degradation of economy, the overcrowded market, the low purchasing power, and the lack of practical

business model etc. The saturated market was one of the key factors that has led to media unsustainability.

Role of Government in Media Market

Macedonian media are a special if not unique case in terms of advertising allocation. Some interviewees alleged that advertising was not allocated according to the audience measures but political eligibility (Sekulovski, October, 2014). Not surprisingly, media were labeled as either pro-government or anti-government. The one favored by the government was “favored” for government advertisements as well. Television remained the most influential form of media in Macedonia (Nikodinoska & Grozdanovska-Dimškovska, 2015). Government advertising frequently ranked among the Top 5 advertisers on TV from 2008 to 2013 except 2010 (see Table 5.6). However, there were no reliable figures published on the share of state advertising in the newspapers (Trpevska, October, 2014). Moreover, no official data were available on the rank of government among advertisers in 2014. Although there were no accurate official numbers published, it was pointed out in the report *Media Freedom Curbed with Public Money* (Nikodinoska & Grozdanovska-Dimškovska, 2015) that the funds allocated to media increased over recent years. The Director of Macedonian Institute for Media (MIM) Petkovska (2014) commented:

There is a lot of self-censorship, non-functional media market in the country, quite a lot of dominance on the government itself, and the ruling political party, on advertising market for media.

Table 5.6

The Ranking and Share of Government Television Advertising in Macedonia

(Trpevska & Micevski, 2014)

Year	Rank of Government Advertising Among All Advertisers on TV	% of Total Advertising on TV
2008	2	4.45
2009	5	2.57
2010	18	1.23
2011	4	2.56
2012	1	4.03

State advertising increased significantly during the election period when some media gave large discounts (almost 90%) to political advertisements (Trpevska & Micevski, 2014). The amount of money will be shown as donations on the account of the particular political party. Discounted political advertisements were intended to garner state advertising after elections.

Journalists, directors, and professors interviewed in Macedonia shared the view that the ruling party played a decisive role in the media market (Petkovska, October, 2014; Sekulovski, October, 2014; Trpevska & Micevski, 2014). They added that the dominance of the government over the media has intensified since the ruling Internal Macedonian Revolutionary Organization–Democratic Party for Macedonian National Unity (VMRO-DPMNE) came into power in 2006 (Ordanoski, October, 2014; Trpevska & Micevski, 2014). The dominance was achieved through the successful “colonization” of 90% of media market through various means including taking over print and digital media outlets that are pro-government and spending millions of Euros of public money on propaganda campaigns (Georgievski, 2014; Ordanoski, October,

2014). Unfortunately, the public campaigns initiated by the government and its ministries turned out a failure in terms of propaganda. Most interviewees expressed reservations of the government's campaigns. Sekulovski (October, 2014), the Executive Director at the Association of Journalists of Macedonia (AJM), said:

...it is very interesting to see that the ruling party is willing to interfere in the media by using governmental campaigns. You know, there wouldn't be a problem if the public interest was actually here and if the amount [of money in advertising] was not that much. But we have a situation where basically the amount of money here is a lot, and plus [in] most of the campaigns there is no public interest...

The influence of the government permeated the media market completely in Macedonia. Political elites realized their political and economic interest through the control of media. Corruptions occurred under various covers and one of them is the media ownership. Director of Macedonian Institute for Media (MIM) Petkovska (October, 2014) commented:

Political elites who had been in power would like to use media for their own political purposes. Corruption occurred. When you have so much influence from the government directly on the media market, it is obvious that it is not very healthy for the development of the media system...

The major concern was that the amount of budget allocated to such campaigns was high, relative to Macedonia's economic status. During the field visit at end-2014, unemployment was 30% for the adult population, rising to 50% for youths and young adults (Georgievski, 2014). Many of those

interviewed said the public money should have been used in promoting employment rate and living standard instead of intensifying the political influence in media (Petkovska, 2014; Sekulovski, 2014; Caushidis, 2014). In other words, the government may have achieved dominance over the media at the cost of social benefits (Georgievski, 2014).

The state-financed advertising in Macedonia was highlighted in the 2014 European Commission report that investigated the progress of the country in joining the European Union (“The former Yugoslav Republic of Macedonia Progress Report,” 2014). State-financed advertising became another obstacle to Macedonia joining the European Union.

With the increased funds allocated to media, the corruption and clientelist relationships grew stronger. The government created various ways of controlling media in financial manners. It labelled media as pro-government or anti-government based on their attitudes towards the government. It demonstrated the need for clear and precise criteria in a transparent mechanism to allocate advertising in order to curb political interests. However, this could be really difficult to break the “tradition” of funding media in different ways. Government advertising was only one of patterns that could secure government’s control over the media. The other two included receiving government funding by favorable editorial policy and receiving money directly from the government (Nikodinoska & Grozdanovska-Dimškovska, 2015).

The heavy reliance on state-financed advertising brought about two dilemmas to Macedonia. First, instead of playing a proactive and promotive role in democratization, media remained a vehicle to achieving political

interests. Furthermore, media could not survive without funding, in different patterns, from the government. This made the new democracy no different from its authoritarian past. Second, this contributed to difficulties to joining EU.

Media Economics in Timor-Leste

Overview of Media Market in Timor-Leste

After independence, television and public radio became pervasive in Timor-Leste's media market. In addition, community radio stations, most supported by international funding, also played an important part in the media landscape (Freedom House, 2015). By 2015, there were seven newspapers, one television broadcaster, and four radio stations (See Table 5.7), all based in the capital city Dili with a population of 193,563 (Freedom House, 2015). There was a lack of distribution outside Dili. For press media, the circulations were small and not independently audited, a situation that resembled Bhutan. *Timor Post*, the most popular newspaper in Timor-Leste, had an average daily circulation of 1,700, hitting 1,850 on its best day ever (Garcia, August, 2014). This phenomenon resulted from the high price of newspaper, low purchasing power, small population, and low literacy rate of 64.07% (UNESCO, 2015).

Table 5.7

Media Landscape in Timor-Leste (BBC News, 2015)

Media	Title	Ownership	Note	Number
Press	Suara Timor Lorosae	Private	Daily	7
	Diario Nacional	Private	Daily	
	Timor Post	Private	Daily	
	Jornal Independente	Private	Daily	
	Tempo Semanal	Private	Weekly	
	Business Timor	Private	Weekly	

	East Timor Centre for Investigative Journalism	Private	News website	
Television	Televisao de Timor-Leste	Public	National	1
Radio	Radio Timor-Leste (RTL)	Public	National	4
	Association of Community Radio Stations	Private	National	
	Radio Maubere	Fretilin party	National	
	Radio Timor Kmanek (RTK)	Catholic Church radio	National	

A distinction of Timor-Leste was that despite the low circulation, some newspapers can be profitable because of the high cost of advertising against the backdrop of low cost of production. The advertising cost was high at US\$600/page in the most popular newspaper *Timor Post*, said by an owner of the *Timor Post* Rosa Garcia (2014). With an average daily circulation of 1,700, this worked out to US\$352.95 cost per thousand (CPM).

In contrast, the *Guardian*, the most expensive non-financial daily charged £85 or US\$132 CPM (Jackson, 2012); the *USA Today* charged US\$114 CPM (USA TODAY, 2015). The efficiency of the advertising spend was therefore three to four times lower in Timor-Leste. Hugo Fernande (August, 2014), a program manager in Asia Foundation in Timor-Leste said:

If you look at the newspapers every day, some are publishing 18, 24, or 22 pages.... I did some analysis before. Half of total pages are advertisements.

Meanwhile, a senior reporter made US\$300 a month. That meant that one full-page advertisement covered the cost of two reporters. Unlike their

counterparts in Bhutan, Timorese newspapers were not in a desperate situation, and the more established ones were profitable. Up to 70% of publication costs can be covered by advertising revenue (Seapa, 2013).

The most popular medium was radio and it had a coverage of 90% of population (BBC News, 2015b). With the support of NGOs, 15 community radio stations were set up from the advent of the democracy in 13 districts in Timor-Leste. There were around 16 or 17 community radio stations in Timor-Leste as at August 2014 (Filipe, August, 2014). Because much of the broadcast infrastructure was destroyed by Indonesia before they left, the radio system was started from scratch. Funding by the international organizations such as the World Bank and the Canadian International Development Research Centre (IDRC) at the advent of independence in 2002 went for community radio. As the director of the Center for Radio Community (CRC) Luis Evaristo Soares (2014) told the researcher, CRC was established to support the community radio projects. Many international donors funded the launch of community radio. But once established, the community was expected to continue running it. Without adequate human resource, the project closed down in 2004 (Soares, August, 2014). Furthermore, technical difficulties limited the reach to rural areas and left many without access to any form of media (Freedom House, 2015). As at 2010, there were 16% of residences without access to any form of media (Soares & Dooradi, 2011).

Community radio stations faced many challenges that the CRC helped overcome: lack of equipment, know-how, and professionally trained staff. The CRC helped them to obtain funding from state administrations. During the data collection visit, this researcher learnt that many staff worked in community

radio stations for free. The president of the Assosiasaun Radio Komunidade Timor-Leste (ARKTL), Prezado Ximenes said he had been working for six years for free (2014). Notwithstanding their passion and commitment to their career, this is not a sustainable way for community radio stations. The only state-owned radio is the Radio Television Timor-Leste (RTTL), which was launched in 2002.

The major obstacles for Timorese media—in shortage of communication infrastructure, know-how, and media professionals—were rooted in the country's under-developed economic environment. However, the improvement would take years to take place in media landscape since this was largely dominated by the whole economic performance. In addition, there was also a paradox in press media. In the case of most popular newspaper *Timor Post*, with the low circulation, it made profits with charging advertising cost as high as US\$600/page. The following section would elaborate on the causes of this paradox.

Role of Government in Media Market

In Timor-Leste, the government was the top advertiser, contributing 25% to 30% of adspend (Santos, August, 2014). Besides advertising from the government, business and the international community were also major advertisers (Betteridge, 2014). In addition to government advertising, the government bought newspapers and distributed them to government offices in rural areas (Garcia, August, 2014; Mendel, 2011). However, this did not result in a promotion of distribution of newspapers to rural areas, said interviewees. The reasons lie in the fact that no one really cared about whether newspapers had been delivered to remote districts or whether Timorese were informed or

inspired, according to Oliveira (2014), a human right activist and senior media observer.

The Executive Director of Fundasaun Fundu Media (FFM) Suzana Cardoso (August, 2014) said that the government bought 600 copies of newspapers of each title daily. Using *Timor Post*'s best day as an example, it means that a third of the circulation was bought by the government; for lower circulating papers, the proportion of sales to government would be even higher.

The dominant role of the government in media market resulted in the subordinate role of media. In order to attain government supports through advertising, media had to entertain politicians instead of playing the designated watchdog role. *Tempo Semanal* exposed a number of corruption and faced the threat of closure in 2014 because the government refused to support it. The international NGOs that tried to help it were stymied by the government. The owner of *Tempo Semanal* Belo, a well-known outspoken activist who contributed to press freedom independent journalism criticized those who put their own interests ahead of media independence and ethics (Betteridge, 2014). At an international anti-corruption conference, he said:

The government chokes us like a chicken's neck, the national and international business community here are too scared to advertise with us because they get all their contracts from the government, and the donor community is too scared to support us because they are afraid by doing so they will undermine their cozy relationship with Government.

To meet requirements of government, many media outlets including the state-owned put more focus on the coverage of ceremonial events that were not controversial (Betteridge, 2014).

In this case, the government was a dominant and, often, the leading advertiser. Because of the financial clout, the government can largely influence media coverage and content. Interestingly, the government officer interviewed for this study had a positive view toward the role of government in media market. Media Advisor Pereira (August, 2014) told the researcher:

.... don't say that the media here survive only because of advertising. Not only because of the subsidy. The government started to subsidize and help the media distribution last year. They just gave this solution in buying from news agency, but in terms of the way they distribute it to the rural areas, to the government institutions in general....

His response conflicted with that of Jose Luis de Oliveira (August, 2014), a human rights activist. At base, their perspectives derived from different hierarchies. From the government's perspective, the role of government for media was "trying to regulate good rule here" (Pereira, August, 2014). Government representatives and advocates saw nothing wrong with the existing system.

When asked whether his office advertised on newspapers, Pereira (August, 2014) denied it:

That's not an obligation. Don't miss that. At least, my office, I never buy advertising. If my institution has money, then I can buy advertisement.

The dominance of the government's role in the media market was demonstrated by government advertising, subsidies, and by the fact that the government purchased newspapers and delivers them. There were no criteria for proper and fair auditing among different publications; on the contrary, newspapers that were critical to the government were refused support. Furthermore, news outlets met interference in seeking sources of advertising revenue from business and international communities, because these were negotiated through contracts with the government.

Media Economics in Slovenia

Overview of Media Market in Slovenia

Freedom House (2015) assessed the status of Slovenian media as “free.” Nevertheless, although Slovenia was regarded as a good example to other former Yugoslavian states, its media remained under strong state control, and there were more media outlets than needed in the marketplace. There were 1,396 media outlets (including newspapers, radio stations, TV stations, and websites) in 2012 (Milosavljević & Vobič, 2012). According to Professor Marko Milosavljević, Head of the Department of Journalism in the Faculty of Social Sciences at the University of Ljubljana, there were about 1,500 registered media outlets in Slovenia by the end of 2014 (Bona, 2014). The rapid increase in number could be seen over the prior two years.

Table 5.8

Media Landscape in Slovenia (BBC News, 2015)

Media	Title	Ownership	Note	Number

Press	Dnevnik	Private	Daily	9
	Delo	Private	Daily	
	Vecer	Private	Daily	
	Slovenske Novice	Private	Daily	
	Finance	Private	Daily	
	Nedeljski dnevnik	Private	Weekly	
	Mladina	Private	Weekly	
	Primorske Novice	Private	Regional daily	
	The Slovenia Times	Private	Weekly (English)	
Television	RTV Slovenia	State-owned	Operating two national TV channels and regional services	4
	Pop TV	Private	National	
	Kanal A	Private	National	
	TV3	Private	National	
Radio	RTV Slovenia	Pubic	Operating national radio stations A1, Val 202 and Ars, regional services and a tourist station with news in English and German	3
	Radio Hit	Private	National	
	Radio City	Private	National	

Most of those media outlets were run by small media companies and literally practised “copy-paste journalism” (Bona, 2014). Thus, the increase in the number of media outlets did not contribute to the quality of media. Conversely, as Professor Milosavljević (October, 2014) explained, “It [the large number of media outlets] is pushing the quality down. The paradox is the more

media companies, the lower the quality of journalism in this country.” This viewpoint was also supported by Mirko Štular (October, 2014), the editor of national public service broadcaster Radio Val 202. He said that even if “some of media owners, editors, or media people . . . really wanted to give something completely new to make our media landscape richer . . . they didn't really make huge success out of it.” Many of those who started radio stations did so out of passion and interest rather than professional knowledge or experience, and the quality of the outlets varied (Milosavljević & Vobič, 2012). Many entrepreneurs did not care about professional standards and ignored the fact that media products were characterized by culture. Some aimed to use the media to exert their own influence on the media, said Leo Oblak (October, 2014), the CEO and owner of the leading and most profitable radio network Infonet.

As shown in Chapter 4's analysis, deregulation and commitment to following the Western model also contributed to a saturated media market, especially in the 1990s, when newspapers were very profitable and newcomers desired to earn easy money out of media outlets (Bona, 2014). There were too many media companies competing for limited economic incentives in such a small market (the population is around 2 million). The Slovenian language is not mutually intelligible with the languages spoken in neighboring states. Although that is a good thing from the perspective of protecting national identity, it limits Slovenian media market to the country itself.

Only national media will survive, said broadcast editor Štular (October, 2014). He added that cross-media ownership—a local radio station owning a newspaper—could survive a crisis. On the future of the multitude of media companies, CEO Oblak said, “Some of them will merge, some of them will

collapse, and some of them will probably close down for some other business in media In the end, the cross-ownership could be a solution (2014).”

At the time of the fieldwork in late 2014, Slovenia was experiencing an economic recession that was expected to get worse. Indeed, the recession did force the financially weaker players to capitulate, leading to a shakeout of the media industry.

Role of Government in Media Market

Slovenia presented a special case in the role of the government in media market. In the mid-1990s, the major advertisers in the Slovenian market were almost all Western companies, which started to saturate the Eastern and Central European market with packaged goods (McBride & Damjan, 2011). In 2005, of the global marketers in Slovenia, two Slovenian advertisers, namely Pejo Trading and Telecom, ranked 3rd and 4th respectively among the biggest advertisers (McBride & Damjan, 2011). In recent years, some state-owned companies, such as Telekom and Petrol, have emerged as the biggest advertisers (Bona, 2014). Although a mere 1% to 2% of advertising came from the government (Milosavljević, October, 2014; Oblak, October, 2014), the state still exerted influence through state-owned companies like Telekom and Petrol, because they were biggest advertisers. Media companies faced the threat of “economic blackmail” from state-owned companies should criticize the government (Bona, 2014).

Even when Slovenia was part of Yugoslavia, it was the most developed among the former Socialist Federal Republic of Yugoslavia states (McBride & Damjan, 2011). Economically, it was the most prosperous country that emerged

from Yugoslavia. Incorporation in the European Union (EU) in 2004 brought more investment and opportunities to Slovenia (European Union, 2015).

Thanks largely to the accession into the EU and to privatization that has taken place over the years, advertising boomed in Slovenia (McBride & Damjan, 2011). Gross advertising spending in 2014 was estimated at 786 million Euros (US\$839 million) (“Slovenia fastest growing digital ad market in Europe in 2014,” 2015), more than double the 2006 estimate of 300 million euros (US\$320 million) (McBride & Damjan, 2011).

Some interviewees (Štular, October, 2014; Oblak, October, 2014) commented that it was necessary to keep a balance between advertising from the government and from the private sector because heavy reliance on either government or private advertising may result in insufficient media independence. The positive situation in Slovenia could be attributed to the country’s better economic environment and its highly privatized media market.

Discussion

At the outset of democratization, spurred by the liberalization of the media market, the media sector reformed and witnessed unprecedented development. Private media industries burgeoned in the capital cities of Bhutan, Timor-Leste, Slovenia, and Macedonia. On the one hand, they contributed to the consolidation of each country’s democracy by representing multiple voices at the grassroots level; on the other hand, the democratic transition also provided room for media to grow. These are implications from the analysis of media economics in the four countries. It does not only present commonality across

these countries in the cause of financial unsustainability, it also shows differences in the form they took when faced with democratic transition.

The state of economy in these countries was not optimistic at the transitional stage. The four countries, except Slovenia that is prosperous relatively, all face with poor economic condition. Furthermore, the small size of media's audiences led to difficulty in achieving financial sustainability. With these preconditions, media industries faced the market saturation and severe competition that had threatened their survival. This was demonstrated in the four countries studied. The deregulation and liberalization of media market at the advent provided great opportunities for media to grow rapidly on one side, it also gave rise to a few questions: how many media industries are enough for a country considered small? How could they compete fairly? This situation calls for rules for fair competition in these countries.

The role of the government in the four countries is similar in the dominance in the market, but differs in the format the government took to exert its influence. The government was the major source of advertising revenue in Bhutan, Timor-Leste, and Macedonia (Vucinic, 2014). In Slovenia, the government ranked among the top 10 advertisers. Advertisers were powerful and influential in deciding the media coverage and the destiny of media, especially when the major advertiser was the government. The state-owned companies gradually exerted more power indirectly from the government on media market in Slovenia. This is considered as a different format taken by the government dominance (indirect) in the market.

Although the dominant role of the government cannot be changed immediately, the advertising audition can be an alternative solution to be done immediately. Advertising was not based on auditing in these countries, but some other “unwritten rules.” Advertising in Bhutan relied heavily on government, and was allocated without any allocation criteria but instead based on rotation. In Macedonia, some media may persuade the ruling powers to regard them as pro-government media so more profitable benefit will be channeled to them. In Timor-Leste, the government favored the media by buying newspapers and sending them to offices. Besides, the government also advertised with the media in Timor-Leste, which led to a subordinate role of media. At the end, it resulted in the lack of media independence and ethics of media. Heavy reliance on the government resulted in the lack of independence of media, which in turn renders the media even more reliant on government funding. Given this fact, it implicates the necessity of objective advertising placement criteria based on circulation and reach of particular media.

With the increasing number of media companies, the quality of journalism declined in the countries studied. Even in Slovenia, which had much better economic performance and less state control compared with its counterparts in the other three countries, quality dropped when the number of media outlets increased (Milosavljević, October, 2014). In the other three countries, the poor quality of journalism is also due to poor working conditions for journalists and insufficient training. This is most manifest in Timor-Leste where the communication infrastructure were restored after their destruction and only with considerable support from international organizations.

Market failure had not been corrected in a timely manner, as was evident in the fact that new players were still driven by political opportunism. They expected either the continuation of government subsidies without allocation criteria, as was the case in Bhutan, or that the ruling power may regard them as pro-government media and so obtain financial support as was the case in Macedonia. Media in Timor-Leste also tried to entertain the government to avoid any interference when they sought sources of advertising revenue from business and international communities. This was also evident in Slovenia where media market was filled with media with limited original content that did not contribute much to culture. To avoid this situation, with so many financially unsustainable media in a small market, the government should take the distinctiveness of small media market into account, instead of transplanting media regulations from developed countries.

Within such small markets, sharing facilities could be one solution to save the cost, but it requires the cooperation among different institutes and organizations. This is an issue common across the four countries. It is worth trying as sharing facilities can increase the efficacy of media industries. It is a win-win plan that media industries can benefit from, in terms of saving the cost and avoiding investing on the repeated communication infrastructure. However, the reality did not go smoothly as in theory. When the researcher conducted interviews in Bhutan, the Managing Director Tshering of Kuensel (June, 2012) suggested that they could supply printing to other newspapers and in fact they had provided this suggestion to other newspapers. But, as remarked by CEO Wangmo (June, 2012) of Bhutan Observer, it was too expensive to print at Kuensel so that they would rather print on their own. When the researcher

raised the suggestion of sharing facilities in the other three countries, interviewees either showed interest about this solution or admitted that they had thought it before but it was never implemented due to complex reasons: bad economic conditions, lack of cooperation spirit, poor infrastructure conditions, lack of an independent regulator etc. One update from Bhutan is that it passed the Media Act in 2016 that empowered the Bhutan InfoComm and Media Authority (BICMA) as regulatory authority to “regulate interconnection or sharing of infrastructure and facilities between or among ICT facility providers.” This reflects the progress in media policymaking in Bhutan and their long-term plan in promoting sustainable and viable media.

Table 5.9 shows the ranking and share of the state advertising in each country, based on accessible figures. It shows a considerable share of advertising expenditure from the state budgets in Macedonia, Bhutan, and Timor-Leste. Slovenia is an outlier in terms of the role of the government in the advertising.

Table 5.9

The Rank and Share of the State Advertising of Total Advertising in Macedonia, Bhutan, Timor-Leste, and Slovenia (Trpevska & Micevski, 2014; Vucinic, 2014; Santos, October, 2014; Milosavljević, October, 2014; Oblak, October, 2014)

Country	Year	Rank	State Share of Total AdSpend on TV (%)	State Share of Total AdSpend on Newspaper (%)
Macedonia	2008	2	4.45	NA
	2009	5	2.57	NA
	2010	18	1.23	NA
	2011	4	2.56	NA
	2012	1	4.03	NA
Bhutan	2014	1	NA	85-90

Timor-Leste	2014	1	NA	25-30
Slovenia	2014	NA	NA	1-2

In Chapter 6, media governance will be discussed in a broad sense. The process of media policymaking in the selected four countries will be investigated and analyzed.

CHAPTER SIX MEDIA GOVERNANCE IN BHUTAN, TIMOR-LESTE, SLOVENIA, AND MACEDONIA

Democratization of the media works as a magnifying glass through which achievements and drawbacks of media legislation may be observed very clearly. At the advent of any democracy, media legislation have yet to adapt to the new circumstances. With few exceptions, it usually takes years for a new government to establish or at least revise the country's media legislation (Voltmer, 2013). In most cases, media will continue to operate in an insecure regulatory environment for years, until new legislation became effective, although reasons vary according to different circumstances. In some cases, they copied the laws and practice from Western countries where have had a longer period of democracy, as in Slovenia and Macedonia. Because enabling laws are not in place, the anticipated participation from public did not happen immediately after democratic transition. This phenomenon is one of the key features of the state-media relationship in emerging democracies (Hadland, 2015).

The "lawless vacuum" period, where the former rules are swept aside and media are left to an unregulated and insecure environment (Voltmer, 2013), was evident in the early years of independence among the four countries that the researcher examined. This delay occurred for complex reasons, including questioning the necessity of having media law, as represented by Slovenia and Macedonia in the first few years, using media laws borrowed from other countries (Indonesian media laws), as displayed by Timor-Leste, and taking time to understand the market and their needs, as shown by Bhutan. Old

patterns and cleavages of the previous regime still existed and played a critical role in political institutions. Some scholars (Porter, 1994; O'Donnell, 1999; Huntington, 2006) argued that even though transplantation of constitutions and legislations took place in Latin America, Asia, and Africa, a gap resulted between enactment of the laws and their application. Addressing the dilemma presented by the hiatus between media law's establishment and its application, this chapter will introduce media governance as a tool to discuss, analyze, and compare the process of media legislation in these countries. First, the concept of "media governance" will be identified.

Definitions and Uses of Media Governance

Governance may be studied from multiple points of view: economics, politics, and other social sciences (Kersbergen & Waarden, 2004; Levi-Faur, 2012). From the perspective of economics, governance is used to reduce transaction costs. In political science, governance is used to resolve problems beyond the jurisdiction of a single state, as in international organizations, agreements, and regimes (Kersbergen & Waarden, 2004). With such a variety of viewpoints, the concept of governance is ambiguous, seemingly a "catch-all" word.

Media governance, as Freedman (2008) stated, refers to "the sum total of mechanisms, both formal and informal, national and supranational, centralized and dispersed, that aim to organize media systems" (p. 14). In this view, media governance encompasses all patterns of rules and regulations that organize the media systems. However, the concept of media governance alone does not provide a new perspective on either the entirety of media policies and regulations or the relationship between media and society. Puppis (2010) took

the concept of media governance to another level. He used an integrated view that is not only restricted to the government, but that also could be horizontally extended from media regulation (at the national level) to self-regulation, and vertically extended from national statutory regulation to a global level (Figure 6.1). In this sense, media governance could be used as an analytical and regulatory tool in describing, explaining, and criticizing rules and regulations.

As an analytical tool, Puppis's model allows for discussion of the interplay between different levels of regulations (statutory regulations and self-regulations), between national and regional levels, and between the private sectors and the public sectors.

Figure 6.1 Media Governance as Horizontal and Vertical Extension of Government (Puppis, 2007)

Based on Puppis's work (2010), Ginosar (2013) suggested that “media governance” is a term that is broader than media policy and regulation. It serves as a conceptual and analytical framework that can be used to analyze and classify characteristics of a specific communication system. Thus, engaging previous public policy literature (Christians, Glasser, McQuail, Nordenstreng, & White, 2009; Curran & Park, 2000; Hallin & Mancini, 2004, 2012), Ginosar proposed a conceptual framework including six components, within which there is more than one possible feature (Table 6.1).

Table 6.1

A Conceptual Framework of Media Governance (Ginosar, 2013)

Media Governance	Components of Governance	Possible Features of Each Components
	Modes of Governing	Market
		Hierarchy
		Pluralism
	Institutions	Formal
		Informal
	Levels	National
		Subnational
		Supranational
	Stakeholders	Industrial
		Societal
		State
	Mechanisms	Competition
		Delegation
		Deliberation
		Negotiation
		Regulation
	Policy Products	Command & Control
		Agreements
		Arrangements

The six components comprise modes of governing, institutions, levels, stakeholders, mechanisms of control, and products of the policy process. The modes of governing mainly refer to norms and values in guiding policymaking. Specifically, there are three categories under modes of governing: hierarchy, market, and pluralism. The hierarchical mode is characterized by a strong role for government and a weak role for civil society (Ginosar, 2013). In contrast, the market mode is built on the strong positions of private corporations. In both cases, there is no cooperation between the government and the private sectors in the particular society. In the pluralism mode, however, the government and the private sector cooperate. The second component, “institutions,” refers to entities through which institutions’ governing activity takes place. The term “formal institutions” refers to state regulatory authorities, while “informal institutions” include industrial and societal organizations. The levels of policy activity indicate the level at which governing activity takes place. Such activity may take place in any phase of governing, such as formulation, surveillance, enforcement, and implementation of policy activity. The “stakeholders” component is distinctively associated with the pluralistic mode of governance, since there is only one stakeholder in either the hierarchical mode or the market mode. This suggests that the mechanism is decided by the modes of governing. In the hierarchical mode, “command and control” is the mechanism, while in market mode, “competition” is the only mechanism. Various mechanisms could exist only in the nonhierarchical mode of governing. Lastly, the “policy products” include compulsory state policy, formal agreement, and informal agreement.

Varied integration and combination of different factors will generate a large number of communication system types. The researcher used the media governance framework to analyze and compare the process of media policymaking from the outset of independence to the present to attain a holistic view over media policy development in the four countries.

Research Goal for This Chapter

In the prior chapters, national identity and media economics in four countries were discussed. Based on the analysis of their characteristics of media economics and the way they took to protect national identity in the four countries, the implications could also be reflected in the recommendations for their media governance. The structural problems these sovereignties encountered could be attributed to the theoretical framework from which they drew. In this chapter, the researcher will use Ginosar's framework of media governance as an analytical tool to describe, analyze, criticize, and compare existing media policies and regulations in Bhutan, Timor-Leste, Slovenia, and Macedonia. By comparing the differences and similarities among four countries in formulation, surveillance, enforcement, and implementation of policy activity, this chapter is intended to highlight the mode of governing of them, to shed light on other small emerging democracies in a similar dilemma.

Media Governance in Bhutan, Timor-Leste, Slovenia, and Macedonia

Bhutan

Bhutan's first media legislation, the Bhutan Telecommunications Act, was passed in August 1999. The Act permitted Bhutan Telecommunications to operate as a public corporation. Also, in 2000 the Bhutan Telecommunications

Authority (BTA) was established to operate as a regulator in the country (Wangchuk, 2008, p. 140). The National Radio Regulations (1999) were enacted following the establishment of the first broadcasting law. These regulations apply to all types of radio communications devices. The Bhutan Information, Communications and Media Act (2006) liberalized media outlets and issuance of media licenses, allowing more media players to enter the market (Freedom House, 2013, 2015). However, government advertising became the major source of media outlets' revenue. This resulted in the heavy reliance on the government and finally led to financial struggles for these media outlets. The Communications and Media Act (2006) was also criticized for lacking protection for journalists. In accordance with the provisions 25 and 80 of this statute, BICMA issued the National Radio Rules in 2011. Besides these media legislations, the Constitution adopted in 2008 shifted the country's governance mode from absolute monarchy to constitutional monarchy, which guaranteed fundamental rights for Bhutanese citizens, such as freedom of speech, opinion and expression and right to information. For the media, the Constitution guaranteed freedom of the press, radio and television and other forms of dissemination of information, including electronic (Royal Government of Bhutan, 2008). This was the first written Constitution in the history of Bhutan, representing the biggest democratic reform for the media.

The free flow of information is important in informing political debate. The right to information is a safety value in a democratic society. As observed by Lord Steyn in a recent English case¹, the right to information guarantees the

¹ R. v. Secretary of State for the Home Department Ex P. Simms, (2000) 2 LR 115(AC).

right to accessing the information held by a public authority, facilitates the exposure of errors in the governance and administration of the country, and prevents the abuse of power by public officials.

Prior to the Right to Information Act, accessing information held by a public authority in Bhutan was difficult. The 1992 National Security Act prohibited criticism of the king, as well as “words either spoken or written that undermine or attempt to undermine the security and sovereignty of Bhutan by creating or attempting to create hatred and disaffection among the people” (Freedom House, 2015). This kept people from discussing sensitive topics by acclaiming that these will undermine the national security and sovereignty.

A draft Right to Information Law was published 2013 to guarantee the transparency of the government. The Law was passed in 2014 after extensive public debate. It stipulated that government officials and agencies must release information that is important to the public. This represents significant progress in Bhutan’s media regulation development. Since democratization was introduced by the third king to Bhutan, it was the government’s intention to enact laws that could protect people’s rights to a higher degree. Given this fact, it shows that the path of democratization can also determine how legislation will be formed and what values can be transferred from the law. Prime Minister Tshering Tobgay said he intended to make his office more accessible to the public; therefore, the Social Media Policy of the Royal Government of Bhutan (Social Media Policy) was passed in February 2015 to strengthen government transparency (Freedom House, 2015). The major processes of media policy activities are shown in Table 6.2.

Table 6.2

The Progress of Media Policymaking in Bhutan

Year	Title	Level	Institution	Outcome of policy
1999	Bhutan Telecommunications Act	National	Bhutan Telecommunications Authority Ministry of Communications	Allows the Bhutan Telecom to operate as an autonomous corporation; Confirms the Bhutan Telecom Authority (BTA) as the regulator.
1999	Bhutan National Radio Regulations	National	Bhutan Telecommunications Authority Ministry of Communications	Regulate the technical aspects of radio communications services in Bhutan.
2006	Bhutan Information, Communications and Media Act	National		Liberalizes media outlets and the issuing of media licenses. However, it lacks specific protections for journalists.
2008	Constitution of the Kingdom of Bhutan	National	The Constitution Drafting Committee	Guarantees fundamental rights for Bhutanese citizens
2011	National Radio Rules	National	BICMA	NA
2013	Bhutan Telecommunications and Broadband Policy	National	MoIC	NA
2014	Right to Information Bill	National	MoIC	Strengthen the transparency of government information to public
2015	Social Media Policy of the Royal Government of Bhutan	National	MoIC	Make important information more accessible to the public

In 2003, the BTA was renamed the Bhutan Communications Authority (BCA), under the supervision of the newly established Ministry of Information and Communications (MoIC). When the Bhutan Information Communications and Media Act was enacted in 2006, BCA was again renamed, as the Bhutan InfoComm and Media Authority (BICMA), and later, at the beginning of 2007, it was officially delinked from MoIC. The delinking demonstrates that

Bhutanese media regulatory authority became an independent regulator that could keep a distance from the government's control. The changes in this media regulator are shown in Figure 6.2.

Figure 6.2 Changes of the Media Regulator in Bhutan

Comparing BTA, BCA and BICMA, the researcher found that they differed in the way the director was appointed and in the major responsibilities in their mandates (see Table 6.3). BTA was established to ensure that the objectives of the government's policies are implemented. The Director of BTA was appointed by the Minister of Communications. Because of the media regulatory authority's affiliation with the government, the authority was put in a conflict of interest, in which it might favor the government instead of serving the public and media by protecting freedom of expression. That the BICMA delinked from the MoIC signaled its purpose of becoming an independent regulator. The Bhutan Information, Communications and Media Act explicitly regulates the establishment of the media regulatory authority and the appointment of its director and members. Unlike the director of BTA or BCA, the director of BICMA is elected from members of the Authority. The members

are appointed by the minister of MoIC on the advice of the Royal Civil Service Commission. However, the appointment of the director is still indirectly made by the government, and BICMA must follow directives from the government. Moreover, BICMA is funded by the government. The heavy dependence on the government in terms of finance and appointment of the Director undermines BICMA's function as a media regulatory authority.

Table 6.3

Comparison of Regulatory Authorities in Bhutan

Year	Regulatory Authority	Appointment of Director of Media Regulator	Major Mandates	Notes
2000	Bhutan Telecommunications Authority (BTA)	Appointed by minister of communications	Ensure that the objectives of the government's policies; Ensure that the National Telecom Policy (1999) is implemented.	
2003	Bhutan Communications Authority (BCA)	Appointed by Ministry of Information and Communications (MoIC)	Not much changed from the major mandates of BTA	Under MoIC
2007	Bhutan InfoComm and Media Authority (BICMA)	Elected by the Authority among members of the Authority. The director should serve as the member secretary of their meetings. (The members shall be appointed by the minister on the advice of the Royal Civil Service Commission.)	Ensure the professional development of the ICT and media sector; Ensure the freedom and independence of media.	Delinked from the MoIC; The Authority is independent from the ministry, the cabinet, and any individuals.

Based on the data above, the researcher noticed that the Bhutanese mode of governance is hierarchical. Participation of civil society has been improved, as shown in the public discussion on the Social Media Policy. However, it has

room to be improved because the opinions from private sector did not really reflect in laws and regulations. When the researcher did the fieldwork, the hearings and discussions were always held in Thimphu. This presents that the top-down democratization gives the government more power. In addition, the Bhutan Telecommunications and Broadband Policy adopted a community involvement and ownership model while providing public services. The major institutions involved in media governing are the national media regulatory authority and Ministry of Information and Communications. Bhutan's policy activities suggest that Bhutan demonstrates a successful model among the developing countries in terms of transparency of government, freedom of expression, and press freedom.

Timor-Leste

The process of media policymaking of Timor-Leste is slower compared with Bhutan because of turbulence and unsettled political institutions. The protection of journalists and involvement of civil society remains limited. The media legislative reform began with the enactment of the Constitution of Democratic Republic of Timor-Leste in 2002. After years of Indonesian occupation and internal conflicts, for the first time in history, the Constitution confirmed the self-determined will for independence (Government of Timor-Leste, 2002). Sections 40 and 41 guaranteed freedom of speech, press and mass media and information. However, Section 40 ("Every person has the right to freedom of speech and the right to inform and be informed impartially") implicitly restricts freedom of speech as it raises the question: what if the expression is not impartial? Should it be protected? In this sense, this provision fails to conform

fully with the international standards that requires no obligation on speakers (Mendel, 2011).

The right to information, which is fundamentally important in guaranteeing the open access to the information held by public bodies, has not been included in the development of legislation. As government data are not transparent to the public, the researcher found it difficult to obtain data on the progress of media policymaking and outcomes of it on the official website of Ministry of Public Works, Transport and Communications. In this case, the researcher largely relied on the data from face-to-face interviewees, *Assessment of Media Development in Timor-Leste* (Mendel, 2011), and reports on Timor-Leste from Freedom House. Here, transparency of the government is determined by how much the government wants to reveal to the public, and how the government wants to show its image in the international arena. If the democratization was much relied on the external forces, as occurred in Timor-Leste, the government will be reluctant to provide better conditions to people. On contrary, the government in Timor-Leste, tried to hold back information.

The Timorese government prioritizes the legislation of media law among other laws, because media, from the government's perspective, may play a stronger role in the near future (Fernandes, August, 2014; Cardoso, August, 2014). This is different from Bhutan where media was encouraged to promote public discourse and freedom of expression. The Media Act was passed in 2014, but many interviewees expressed dissatisfaction with the law (Garcia, August, 2014; Fernandes, August, 2014). Without participation of journalists and civil society in its drafting, the Media Act failed to address journalists' concerns on protection of freedom of expression. This

notwithstanding that the “involvement of civil society organizations” was generally accepted by the Timorese government (Mendel, 2011). Prior to its passage, the draft was only submitted to the parliament with the agreement between the government and the United Nations Development Programme (UNDP), rather than any civil society organizations. Besides the lack of involvement, the procedures of the formulation, enforcement, and implementation of the law are not tabulated on the website of Ministry of Public Works, Transport and Communications. Only 26 articles addressed issues that related to journalists’ rights. Instead, the parliament inserted 17 articles that restricted journalists’ freedom of expression and the right to information. The focus was on licensing, company management, and criteria for punishment and fines. Based on the comments of interviewees’, the fines were quite heavy for journalists, whose monthly pay averages US\$120 (Fernandes, August, 2014). The processes of policymaking are shown in Table 6.4.

The Media Act created the Press Council, financed by the government, to operate as the regulator. The Act empowers the Press Council to fine journalists. Without financial independence, the autonomy of the Press Council is questionable. Additionally, the Act sets high requirements, including the academic qualification and internship, for those who desire to be a journalist. Journalists who want to practice in Timor-Leste must be accredited by the Press Council. These may seem reasonable as an attempt to raise minimum standards but it is too demanding for an emerging democracy like Timor-Leste. More realistically, instead of setting high threshold for journalists, the government should provide more opportunities for students majoring in journalism. As remarked by Cardoso (August, 2014), the director of Media Trust Fund

Foundation, it was very difficult for them to have journalists who are good in writing and reporting. Therefore, she provided trainings to fresh graduates who would not otherwise qualify to be journalists.

Table 6.4

The Progress of Media Policymaking in Timor-Leste

Year	Title	Level	Institution	Outcome of policy	Notes
2002	Constitution of the Democratic Republic of Timor-Leste	National	The Constituent Assembly	Guaranteed freedom of speech and information, and freedom of the press and mass media	It put restriction on the freedom of speech.
2009	Penal Code	National	Ministry of Public Works, Transport and Communications	Decriminalized defamation	Before the Media Act, Timor-Leste applied Indonesian media law.
2014	Media Act	National	Ministry of Public Works, Transport and Communications	It has undesirable provisions: Creates the government-sponsored Press Council with the power to fine journalists; Academic qualification and experience requirements of journalist, which are unrealistic for Timor-Leste).	

After the parliament approved the law, the government offered cash subsidies at around 30,000 to 50,000 in USD in an attempt to promote the quality of journalists (Fernandes, August, 2014). However, there was no criteria on monitoring the money use which left the room for corruption and misuse. Notwithstanding these circumstances, journalists that the researcher interviewed remained optimistic about the Media Act because they expected that the judges would not follow the unconstitutional articles (referring to the

articles that prevent journalists from enjoying their rights), but they would apply other related laws or precedents. This view was generally held by Timorese journalists. However, this phenomenon also poses the questions of “rule of law” if the enforcement of the Media Act mainly depends on the judges’ will. Generally, this Media Act constitutes of part of broader threat to Timorese democracy.

It is evident that Timorese mode of governance is hierarchical. The participation of civil society has been strictly limited. In the development of the Media Act, the participation of civil society was not guaranteed. The Media Act does not ensure journalists’ rights as expected, on contrary, it impedes the freedom of expression. The major institutions involved in media governing are media regulatory authority and Ministry of Public Works, Transport and Communications. In this case, multiple stakeholders’ participation in the development of laws and regulations is necessary. The mode of governance should be changed to allow multiple stakeholders’ participation. The path of democratization in Timor-Leste was neither smooth nor top-down. This path largely decides the way the legislation is formed and the way the government treats media. This also represents as an example contrary to the Bhutan case.

Slovenia

The Constitution of the Republic of Slovenia (1991) guarantees the freedom of expression in a broader way compared with the other three countries studied. Protecting “freedom of expression of thought, freedom of speech and public appearance, of the press and other forms of public communication and expression”, it fundamentally grounded the basic human rights in free speech prior to the enactment of media law. It took four years from independence to

pass the Mass Media Act (1994). However, it lacked the ownership restriction rules and sanctions of violation on concentration. Thus, the phenomenon of media concentration became inevitable. Furthermore, the Mass Media Act (1994) did not prohibit sales of broadcast channels. The act had no sanctions against violators. In this case, the act had no “tooth” to prevent potential violations in the first place. If the cost of breaching the law is so low, the law cannot deter future violators. Instead of focusing on the interests of citizens, it focused on the interests of the state. Table 6.5 shows the process of establishing media legislation in Slovenia.

Additionally, there was a misunderstanding of interplay between the state and the market mechanism. The force of political control over media was overlooked as it emerged in a “soft” and “indirect” form. Media ownership was centered on a few local players who were related with political elites (Hrvatín & Milosavljević, 2001). The political power could guarantee their interests by distributing resource in broadcasting to a few small local players (Broughton-Micova, 2013). Another problem was insufficient transparency of ownership.

The new Mass Media Act was established in 2001 with the focus on media plurality and diversity. To address media diversity, this act stipulated the restrictions on concentration. For example, a newspaper owner who has 20% or more than 20% of the share or voting rights must not be an owner of a radio or television broadcaster. However, the Radio and Television Corporation Act of Slovenia (2005) was regarded as a step backwards in legislation. The restriction on ownership was abolished and extended “the right of correction.” Specifically, anyone who feels offended by whatever was written or said could request a “correction.” This article largely eroded the editorial independence

and press freedom. The major processes of media policy activities in Slovenia are shown in Table 6.5.

Table 6.5

The Progress of Media Policymaking in Slovenia

Year	Title	Level	Institution	Outcomes of policy	Notes
1991	The Constitution of the Republic of Slovenia	National	The National Assembly of the Republic of Slovenia	Freedom of expression of thought, freedom of speech and public appearance, of the press and other forms of public communication and expression is guaranteed	
1994	Mass Media Act	National	The Broadcasting Council	1. The law cannot prevent the sale of broadcast channels; Non-transparent media concentration; 2. No ownership restriction rules; 3. No sanctions of violation on concentration of the media.	
1997	The first changes to the Mass Media Act (1994) were proposed.	National	The Broadcasting Council	1. No change in ownership restriction rules; 2. No sanctions of violation either.	It focuses more on the interests of the state but not the interest of citizens.
2001	Mass Media Act	National	The Broadcasting Council	Protection of diversity and pluralism (art. 56 & 57); Restriction on the maximum ownership share (art. 54)	State's attitude towards media deregulation was brought in.
2005	Radio and Television Corporation Act of Slovenia	National	The Broadcasting Council	1. Abolishing the restrictions on ownership; 2. The right of correction.	
2007	Digital Broadcasting Act	National	The Broadcasting Council		
2011	Law on Audiovisual Media Services	National	The Broadcasting Council		

Based on the data above, the researcher concluded that the mode of governance in Slovenia is hierarchical. The freedom of expression and speech was largely protected by the Constitution. However, participation of civil society has been limited in the development of laws.

Macedonia

In the latest report of Freedom House (2016), Macedonia's press status declined from "partly free" to "not free" because of the government's illegal activities, corrupt ties between officials and media owners, and threats to media professionals. The situation for journalists is not optimistic in Macedonia.

There was no broadcasting law until 1997 in Macedonia. The first Broadcasting Law was discussed for years before it became effective. It laid the foundation of new democratic media systems. Also, it established the public service broadcasters and endorsed private media (Georgievski, 2006). Freedom of public expression and of speech was protected by Article 4 of this law. There was a popular view that media law was not necessarily needed, since "freedom of speech, public address, public information and the establishment of institutions for public information" had been guaranteed in the Constitution of the Republic of Macedonia (1991).

In 2012, the Civil Defamation Law was passed. It was in fact a parallel change to the Penal Code in removing the defamation. Although defamation was decriminalized by the Penal Code, reports, editors, and media owners remained open to large financial claims in the Civil Defamation Law (2012).

The Law on Media and the Law on Audio and Audio-Visual Media Services were passed by parliament on 25 December 2013 and amended a

month later on 25 January 2014. The Law on Media created a new government-dominated media regulator Agency for Audio and Audiovisual Media Services to replace the Broadcasting Council (Freedom House, 2015). The new regulator was empowered to impose large fines. However, there were no explicit provisions that stipulated the criteria of charging fines. Interests were vaguely defined as “public order.” This suggests that implementation of the law was problematic because of undue political influence.

In 2014, the Amendments of the Law on Media was adopted. It created another mechanism for the government to fund pro-government media in the name of subsidizing content production for national television broadcasters (Freedom House, 2016). The progress of media policymaking is shown in Table 6.6.

Table 6.6

The Progress of Media Policymaking in Macedonia

Year	Title	Level	Institution	Outcome of policy	Notes
1991	Constitution of the Republic of Macedonia	National	The Assembly of the Republic of Macedonia	The freedom of speech, public address, public information and the establishment of institutions for public information is guaranteed	
1997	Broadcasting Law	National	The Broadcasting Council	Laid the foundation of new democratic media systems	
2005	Law on Electronic Communications	National	The Broadcasting Council		In line with the EU (2002) legal and regulatory framework
2012	Civil Defamation Law	National	The Broadcasting Council	Authorized large fines for reporters, editors, and media owners up to	

				€27,000 (\$34,000)—€2,000 for the reporter, €10,000 for the editor, and €15,000 for the outlet owner.	
2013	Law on Media	National	The Broadcasting Council	Created a new government-dominated media regulator Agency for Audio and Audiovisual Media Services to replace the previous Broadcasting Council	
2013	Law on Audio and Audio-Visual Media Services	National	The Broadcasting Council		
2014	Amendments of the Law on Media	National	The Agency for Audio and Audiovisual Media Services	Exempted online outlets from regulation, minimized the obligations of print media, allowed the ZNM to nominate one of the regulator's seven council members, and inserted language to ensure that all future content rules comply with standards set by the European Court of Human Rights (Freedom House, 2016).	
2014	Law on Electronic Communications	National	The Agency for Audio and Audiovisual Media Services		In line with the EU (2009) legal and regulatory framework

The political ideology that built on the new social and economic structures treated the media and journalism as a tool for achieving political and corporate interests of the emerging elites, instead of seeing them as a means for effective citizen participation.

The Council of Europe and the European Commission played a positive role in the development of first two broadcast laws, but enforcement and implementation of laws was very weak. Generally, there is no rule of law in this society. It suggests that the mode of governing in Macedonia is hierarchical, where the government took the dominant role, instead of market or pluralism. The government could intervene in the name of national safety and health. Further, access to public information was not ensured consistently by the government. It selectively enforced the open access in accordance with the government's own interests. It usually delayed responses and shunned independence of media outlets.

The situation for journalists declined to the lowest point in 2015. The press status of “not free” was largely attributed to illegal behavior of the government. Specifically, the government committed wiretapping operation that targeted more than 100 journalists (Freedom House, 2016). There are a number of death threats and forms of intimidation left unprosecuted (Freedom House, 2013).

As laws and policies were mostly initiated by the government, it is concluded that the governance mode is hierarchical.

Discussion

Using the framework of media governance (Ginosar, 2013), it was found that little state control was enforced on media markets when liberalization of media markets began, but the political interference was not avoided in the implementation of laws and regulations.

None of the four countries established a platform for the government and the private sectors to have an open dialogue. Multiple voices should be heard to avoid any possible bias and impartiality. It could only be achieved through the collaboration among political and economic elites, media owners, media professionals, and the public (Hrvatin & Petković, 2011). Bhutan provided more room for the participation of civil society since the democratization was introduced from the top, which will be discussed in later part. The insufficiency of cooperation among multiple stakeholders has been demonstrated across the four countries. On contrary, private sectors financially relied on the support from the government. Therefore, the cooperation could not happen if the media is not financially independent.

The path of democratization partly decides how the legislation will be formulated and implemented. It is manifest in the case of Bhutan. The Right to Information Law 2013 shows the motivation of the government that it wants to be overseen by public to ensure the fairness and transparency. The top-down revolution has more positive impact on the legislation. Bhutan was introduced with democracy by the former authoritarian leader, which is also reflected in the legislation. The more positive attitude the government held, the better result this country will gain. However, not every country's leader can implement this method, since the path of democratization differs from country to country. In a country where democratization was brought by international forces, like Timor-Leste, it did not have the internal forces for a change in their political institution and mechanism of the governance. In such case, it is more likely that the government treats media as tools to protect political elites, as learnt from features of state-media relationship in emerging democracies and the facts in

Timor-Leste. The researcher noticed that it was even harder for these countries to change the political elites' mindset. It represents that the path of democratization decides the choices of the government in changing laws and regulations.

The deficiency of the media law was criticized when it was established. This was evident in Slovenia and Macedonia. When the media law was enforced, however, it faced new criticisms on its deficiency. The deficiency included the absence of ownership restriction rules and sanctions against media ownership concentration. Without sanctions, the law is toothless and has no effects of threatening and preventing potential violators in the first place. This resulted in more media concentration.

As the prerequisite of any legal action, transparency of media enterprises must be established. In most European countries, information of media business is used as the basis of analyzing and intervening of the government. In this research, the information of media business, public expenditure on state advertising, ownership structure etc. is not appropriately and sufficiently disclosed (Trappel & Meier, 1998; Trpevska & Micevski, 2014). Transparency of legislative procedures, finances, and management is of great importance for public interest and furthermore, it is essential for a democracy.

Based on the investigation on the four countries, the researcher found that the emerging democracy experienced peaceful and top-down democratization was more likely to have transparent rules and cooperation among multiple stakeholders. The country that had a more turbulent history

tended to have more restricted rules on journalists and to treat media more like tools, as in Timor-Leste. Media governance of the four countries is compared in Chapter 7.

CHAPTER SEVEN CONCLUSION

In the present study, the researcher selected four small emerging democracies, namely Bhutan, Timor-Leste, Slovenia, and Macedonia, to investigate how can the media in such countries function when their smallness precludes financial independence. Following previous research on state-media relationship in emerging democracies, peculiarities of small media markets, and studies on small states' media policy, the researcher posed three research questions:

RQ 1: How does national identity shape media policy in small emerging democracies?

RQ 2: How does media economics shape media policy in small emerging democracies?

RQ 3: What framework for studying media policy could guide researchers to study small emerging democracies?

These research questions were raised in an attempt to learn what caused the current situation in each country's media landscape, how their media may be guided to a sustainable situation, and ultimately how to ensure that media may function in the context of small emerging democracies.

National Identity and Media in Small Emerging Democracies

Besides facing pressure on the political and economic fronts, small emerging democracies also face the question of national identity. While media serve as a means to preserve national identity, the language use and historical background, as main factors of national identity (Smith, 1991, p. 14), also affects the way media policy is formulated in small emerging democracies. The

goals of media policy differ from country to country, but small emerging democracies share a common desire to protect national identity with the aim of addressing national language and sovereign in the trend of globalization. These democracies share commonalities since they were similar in the transitional stage and with the restraints of small size. It was common for them that the path of democratization influenced the way of developing media and formulating media policy in their countries, although they differed in pathways of democratization.

It is no coincidence that among the four countries studied Bhutan and Slovenia were the two most able to preserve their national identity. They share similarities in the peaceful and top-down democratic transition so they could set explicit goals of protecting national identity. This priority has also been projected in their media policy as well. Bhutan articulated the aim of protecting its culture in devising the concept of Gross National Happiness (GNH) and used this construct as a guide in media policy. This distinguishes Bhutan from countries that put priority on other material goals. Also, Bhutan shows a special case in how democratization took place, which was introduced from the former authoritarian leader, and how national identity shaped the media policymaking, as it was included in 2013 Media Policy. Slovenia regulated language use in media and developed rules limiting the proportion of foreign ownership in media companies (Hrvatín & Milosavljević, 2001) as the national language is an important factor in the construction of national identity (Molnar, 2010). Although Slovene is not mutually intelligible with most surrounding states, it feels the influence from of Italian and Austrian broadcasting. Thanks to the

regulation on language use in Slovenia, it largely maintained the sense of belonging and national identity.

In Timor-Leste, where democratic transition was not carried out in a peaceful and top-down way, the government chose Tetum and Portuguese as their national language for complex historical reasons. Although most Timorese cannot speak their national language, nevertheless, the government chose Portuguese as the country's national language for political reasons: most members of the ruling elites speak it and when Timor-Leste was invaded by Indonesia, only Portugal and Singapore stood out from the international community in protesting the invasion. On the one hand, it reflected the political consideration of the country at the transitional stage; on the other hand, this choice partly impeded Timor-Leste in becoming a coherent and viable nation.

Macedonia experienced the top-down transition with some bloody fights. Although Macedonian is the official language, other languages are used within ethnic groups as well (Trpevska, October, 2014). It led to a splintering of the media market as well as confusion in the national identity in Macedonia. From the above cases, it would appear that it is necessary to consider the national language seriously in media policymaking as it has an impact on the national identity.

In all the four countries, regime change afforded the opportunity for media development. The countries liberalized media markets at the beginning of democracy. The ways the government liberalized media market included deregulation prevailing among the Eastern and Central European countries, including Slovenia and Macedonia, and promoting private newspapers prior to

the transition, as in Bhutan. For Timor-Leste, although significant reconstruction on communication infrastructure had been made with support from the UN and NGO donors, this could not help media much to develop further than infrastructure. This is partly due to the focus on tangible material goods rather than know-how and professionals. Slovenia and Macedonia intentionally applied the Liberal Model to the media market to shake off the media's subordinate role to the state. This resulted in an initial media boom in both countries. On the one hand, media diversity was seen in both countries; on the other hand, the saturated market could not sustain so many market players in such small media markets. This raises a key question: was plurality in reality attained through the increasing number of outlets? As observed by Professor Marko Milosavljević (October, 2014), whatever the practical effect of the large number of outlets on the country's development and politics was, the quality of media content suffered.

Based on data from the four countries, there are different types of democratic transitions and they appear to have an impact on media policy. Peaceful transition describes how Slovenia and Bhutan's democratization happened. Non-peaceful transition refers to what happened in Macedonia and Timor-Leste. There are another two types of transitions characterized by what drove the country to a democracy — top-down and bottom-up transitions. Top-down transition is exemplified in Slovenia, Bhutan, and Macedonia, and bottom-up by Timor-Leste where democratization was characterized by internal and external force. Internally, Timor-Leste remained weak in the rule of law, security services, institutional transparency, and economic development (Margesson & Vaughn, 2009). Externally, it needed assistance from the

international community, coming through the United Nations, to establish the new state; hard infrastructure construction was given much attention, without sufficient focus on the importance of media in promoting responsible citizenship and the collective national identity. Bhutan's democratization was marked by peaceful and top-down transition, promoted by a visionary king of the formerly authoritarian state. Its government intentionally encouraged private newspapers to play a functional role in consolidating the new regime as well as overseeing the transparency and accountability of the new government. The path of democratization and any substantial change in the economy of an emerging democracy largely determine the relationship between the media and the state, a fact that is made manifest in Bhutan's unusual journey from absolute to constitutional monarchy. Ultimately, such factors decide the direction the media policy development in a given country.

Two states Slovenia and Macedonia shared a number of commonalities deriving from the same "vein" of the former Yugoslavia. Media in Slovenia and Macedonia were significantly affected by political changes, especially with independence in the 1990s (Hrvatín & Milosavljević, 2001). Their media systems were marked by strong integration between media and political elites, partisanship of the media, and weak professionalism (Spichal, 1994), but they differed in the extent to which they liberalized their media. The differences could be attributed to other social and political contexts. In Macedonia's case, since the Macedonian ruling party, VMRO-DPMNE, came into power in 2006, conditions for media independence have worsened. It was evident that the media's independence was affected in various ways. At the outset of independence, a view prevailed in Macedonia and Slovenia that because

freedom of expression had been guaranteed in the Constitution any law to regulate media would be unnecessary. Because of the geographical advantage in touching the prevailing Western model, Slovenia and Macedonia struggled more in adopting media law than the other two countries. In Slovenia, adoption of media law had been discussed for four years, from the onset of independence; whereas in Macedonia, it took Macedonia seven years to adopt its first broadcasting law in 1997 (Trpevska & Micevski, 2014).

A regime can be changed overnight but not the mindset of people. People inevitably carry over old habits and legacy without recognizing why they are doing so. A population's mentality does not change on the day democracy is established. This was observed in all four countries. In Bhutan, people were passively exposed to the concept of democracy when the king decided to step down from the throne. The absence of the components that usually could contribute to the consolidation of a new democracy resulted in an open-ended project in the democratization of the Bhutanese media. Timor-Leste, on the other hand, saw the unfortunate results of destabilization, international forces, and lack of knowledge of democratic values and effective means for citizens to hold their government accountable. A relatively fresh and underdeveloped democratic culture was also seen in Slovenia and Macedonia, where investigative journalism was almost impossible and where problems were compounded by the countries' small size. Too, members of the old elites resisted relinquishing their influence over all social sectors, including media. They reappeared with new titles in positions of power over institutions that were never fundamentally restructured when regimes changed. The concentration of the political powers led to placement of media ownership in a

few elites' hands. In this situation, especially in small states where political power was particularly influential, personal judgments played a bigger role in the media market. The result was especially clear in the case of Macedonia, where people were tagged with labels of "pro-government" or "anti-government" as adjudged by the ruling party. The degree of understanding of the features of democracy, among the public as well as among the leadership, will influence the implementation of policies. There is a gap between what the country is supposed to be and what the country is.

Media Economics: The Structural Weakness

The understanding of media economics is crucial to small emerging democracies because the size of a market bears strongly on the survival and sustainability of media. The issue is further complicated when the political environment is not as stable as those of mature democracies. In the four countries studied, the survival of the media was threatened by their inability to be financially independent. In exploring the characteristics of the four countries' media markets, the researcher found that similar elements contribute to the structural weakness of media economics in small emerging democracies.

The commonality lies in that the government dominates in the media market across the four countries. The only difference is the form taken by the government in exerting its influence on the market. In Bhutan, Timor-Leste, and Macedonia, the government was the major source of advertising revenue. Bhutan's government was the biggest advertiser in the newspaper market, with its advertisements accounting for 85% to 90% of the newspapers' total revenue (Vucinic, 2014). In Macedonia, the government was among the biggest

television advertisers from 2008 to 2013, except in 2010 (Trpevska & Micevski, 2014). A media outlet regarded as pro-government would be favored with government advertisements as well. Besides advertising in the newspapers, Timor-Leste's government also purchased 600 copies of each title and distributed them to government offices in rural areas daily (Garcia, August, 2014; Mendel, 2011). In comparison with the three counterparts, Slovenia stands out as an exception in regard to the government advertising. A mere 1% to 2% of advertising comes from the government. Influence on media was exerted indirectly through state-owned companies, such as Telekom and Petrol, which have been among the biggest advertisers in recent years (Bona, 2014). Therefore, no matter what formats were taken by the government, it does not change the nature of the dominant role of the government in small emerging democracies.

The heavy financial reliance of media on the government is the seedbed of unfair and unhealthy competition, ultimately threatening the media's watchdog role. Under this circumstance, rules for fair competition are primary in these countries. With increased government support, media become less enterprising, with fewer investigative journalists assigned to controversial subjects (Trpevska & Micevski, 2014). The role of media as a watchdog is undermined by the financial dependence on the government of the day. More critically, it may result in financial unsustainability for the media players. In this scenario, media professionalism becomes questionable because journalists are underpaid and the profession was not well respected. An independent public body is needed for allocating advertising on a professional and transparent basis. The public body could be formed by civil societies, media professionals,

and scholars in a manner of greater representativeness, who are not tied to political influences.

The four selected countries are marked by their diverse media outlets, which are all centered in capital cities. Because of the small size of audiences (readers/viewers) in their capital cities, most private media companies are on the verge of closure. This was evident in Bhutan, Timor-Leste, and Macedonia. Liberalization and the absence of media legislation at the outset of democratization allowed many entrants into the market. The root cause is the absence of media legislation at the beginning of democratization, which would have helped draw up some ground rules for the relationship between the state and the media in the context of regime change. These ground rules would minimize government interference in such financial matters as advertisement allocation and circulation.

With considerable constraints in market size and economy condition, small emerging democracies should explore alternative solutions to develop a healthier media market, where media can be financially sustainable and free of political interference. For example, objective advertising placement criteria could be provided based on circulation and reach of particular media. Facilities, such as printing presses or the distribution network, could be shared to save on the duplicated infrastructure.

Media Governance: The Framework of Media Legislation

One key feature of the state-media relationship in emerging democracies is that rapid change results in a disconnect between constitutional guarantees and practice in reality (Hadland, 2015). Media legislation and policy may take years

to come up to speed in a new democracy, as evident in Slovenia and Macedonia. As Voltmer (2013) observed, “normalization” takes time. Over time, media legislation that was promulgated then proved deficient.

As described in Chapter 6, the researcher found that Ginosar’s (2013) six-component framework covered the process of creating media policy as a whole. To recap, the six components are:

1. Modes of governing (values and norms in guiding policy);
2. Institutions (through which governing activity takes place);
3. The level of activity (at what level governing activity takes place);
4. Stakeholders (the main subjects: state institutions, supranational institutions, and private sector etc.);
5. The mechanisms of operation (how to achieve policy goals); and
6. The outcome of the policy (see Table 6.1).

After reviewing the whole process of creating media policy in the four countries, the researcher found that they shared more commonalities than differences in policy formation.

There are three main categories under modes of governing: hierarchy, market, and pluralism. The modes of governing refer to the ideology regarding governance. The hierarchical mode is characterized by a strong role of the government and a weak role of civil society in policy processes (Ginosar, 2013). On the other hand, the market mode is built on the strong positions of private corporations. In these two modes, either the government or the market plays the essential role in the policy formation. None of these two modes takes

the input from other stakeholders into account. Only in the mode of pluralism, is there cooperation between the government and the private sector.

Policy process in the four countries are all marked by the hierarchical mode of governing. Although the Bhutan case reflects some participation from the private sector, a platform for the government and the private sectors to talk was missing. At the advent of independence, Slovenia and Macedonia, like many other Eastern and Central European countries in transition, embarked on transforming state regulation into market regulation. The ensuing discussion over the necessity for media legislation in Slovenia and Macedonia proved contentious and dragged on for years, with the result that media governance relied on market forces by default rather than on legislation. Liberalizing the media market resulted in a media boom as many media players entered the market. This was not anticipated by the policymakers until the market was saturated with newcomers. Accordingly, Slovenia and Macedonia promulgated media legislation to restore government control over media.

In Bhutan and Timor-Leste, the governments also played the dominant role in policymaking by formulating media laws with little consideration of other stakeholders such as media professionals and media owners. This casts light on the fact that the dominant role of government in media market could reflect in media policy governing as well.

Regarding the institutions through which governing activities take place, there are three main categories: formal institutions, informal ones, and a combination of both. Ginosar (2013) stated that “informal institutions can consist of both formal and informal members’ institutions.” It means that formal

as well as informal institutions can serve as the platform for discussing mutual values, “formulating joint and agreed policies,” and even implementing policy, in some cases (Ginosar, 2013). In the case of these four countries, the dominant role of governance is taken by the formal institution: state regulatory authority. There was little to no cooperation between formal and informal institutions such as civil societies and media organizations to solve controversies based on their mutual interests.

A good governance of the media must involve greater participation of other stakeholders in the policy processes (Bardoel & D’Haenens, 2004). This is to ensure that media owners, media professionals, and the public could contribute in the policymaking by criticizing the existent policy, providing input and so on. Only the freedom of expression allows constructive input in the policy formulation process (Hrvatín & Petković, 2011). In the present study, the hierarchical mode of governing, in which the government plays the dominant role in policymaking, has no mechanism for input from multiple stakeholders, which is vital for small emerging democracies.

In small countries, the relationship between politicians and media tends to be close. This was most evident in Macedonia, where dominance over media has increased through government campaigns and other financial dependence. The social environment for freedom of expression and press freedom is worsening in Macedonia, which reflects in the fact that the press status declined from “partly free” to “not free” in 2016 (Freedom House, 2016).

A Conceptual Framework for Studying Media Policy in Small Emerging Democracies

Based on the research findings above, the researcher proposes a conceptual framework for studying and analyzing media policy in small emerging democracies (Table 7.1). As noted, the four countries tend to have the similar patterns regarding media economics and media governance, although they vary in their pathways to democratization and national identity. Categorizing new democracies in one of the existing models leads to conceptual overstretching (Voltmer, 2012). The proposed framework, taking into consideration the four countries' crucial features (their state-media relationship at the transitional stage, media economics, and media governance), is intended to provide an analytical tool for researchers to describe, study, and compare countries that share the same concerns over media policymaking. Based on characteristics suggested by the present study, the researcher raises three dimensions (national identity, media economics, and media governance); each dimension contains several important values and principles found in the present case study.

Based on research findings in Chapter 4, although media landscapes of the four countries vary according to the historical background and are influenced by elements of former regimes, their reaction to the sudden social changes tends to have patterns, reflecting crucial elements of national identity. The researcher chose democratic transition, protection of national identity, liberalization of media market, and professionalism as values and principles because these are critical to the policy choices. The type of democratic transition decides how the government will treat media. Peaceful top-down democratization, exemplified by Bhutan and Slovenia, provides room for media

to grow. When the language use was involved in laws, it also reflected the side of political consideration. At the outset of democracy, small emerging democracies are more likely to learn from the Liberal Model to open their media market, as in the four countries studied. The government provides favorable conditions for media by deregulating the market and promoting them to grow. Instead of setting high threshold for journalists, as in Timor-Leste, more trainings should be provided to journalism students who are passionate in pursuing this career.

In Chapter 5 as shown in Macedonia's case, the dominant role of government in advertising resulted in escalating corruption and clientelist relationships between the government and media. The lack of a real market mechanism, combined with the governing mechanism of "control and command" from the government, made it even harder for media to play a functional role in a given society. The diversity of media outlets contributed to the consolidation of each country's democracy by representing multiple voices at the grassroots level. However, the small size of the media's audiences led to market saturation and severe competition, thereby threatening the media entities' survival in these countries. Media in the four countries are financially unsustainable. The governments in these countries dominate in media market in different formats, but it does not change the fact of unsustainability. A healthy and fair market is the premise for media. The "unwritten rules" of allocating resources to media should be replaced by "written rules" of fair competition and objective criteria based on independently audited figures.

The framework of media governance, adapted from Ginosar's (2013), has three values and principles based on data collected in the present study.

They are platform for participation from multiple stakeholders, independent regulator, and transparency of legislation process. Three of the cases, not Slovenia, exhibited values of the hierarchical mode of governing. Cooperation among diverse stakeholders is seldom seen, because there is no mechanism that ensures multi-actor and multilevel governance. In such case, an open dialogue among multiple stakeholders is needed. Bhutan and Slovenia show that the top-down democratic transition has positive influence on the process of legislation, as they are more transparent on the process and provide relatively more space for discussion. If the country's democratic transition was initiated by external forces (e.g. Timor-Leste), it lacked the internal forces for a change in both political institutions and political elites' mindset.

Table 7.1

A Conceptual Framework for Studying Media Policy in Small Emerging Democracies

Dimensions	Values & Principles	Media's Responses & Policymaking				Implications for Small Emerging Democracies
		Bhutan	Timor-Leste	Slovenia	Macedonia	
National Identity	Democratic transition	Peaceful & top-down	Non-peaceful & bottom-up	Peaceful & top-down	Non-peaceful & top-down	Peaceful top-down democratization offers room for media to grow.
	Protection of national language	Value & national language protected in policy	Tetum & Portuguese as national language	Language use regulated	Language use regulated	Language use reflects protection of national identity and political purposes.
	Liberalization of media market	Private newspapers encouraged to grow	Communication infrastructure restored	Deregulation	Deregulation	Government should provide favorable conditions for media at the advent of democratization.
	Professionalism	Insufficiency due to young democracy	Insufficiency due to young democracy	Professional but need platform to participant	Professional but need platform to participant	Trainings should be provided to journalists instead of setting high threshold for them.
Media Economics	Financial sustainability	Financially unsustainable	Financially unsustainable	Financially unsustainable	Financially unsustainable	Government is dominant in market, but differs in form.
	Fair competition	Insufficiency	Insufficiency	Insufficiency	Insufficiency	Fair competition rules needed.

	Transparency of ownership	Good	Not achieved	Not achieved	Not achieved	Rules disclosing information on media ownership needed.
	Criteria of allocating resources	Rotation without auditing the circulation	Pro-government media	Not clear	Pro-government media	Advertising placement rules based on objective criteria such as circulation and reach should be instituted.
Media Governance	Platform for participation from multiple stakeholders	Relatively more than its counterparts in the other three countries	Limited	Limited	Limited	Top-down democratic transition has more positive impact on the process of legislation. If the country's democratic transition was initiated by external forces (e.g. Timor-Leste), it lacked the internal forces for change.
	Independent regulator	Bhutan InfoComm and Media Authority	Press Council	Agency for Communication Networks and Services of Slovenia	Agency for Audio and Audiovisual Media Services	The independence of media regulators is questionable because of the way of financing and appointment of the director.
	Transparency of legislation process	Good	Not good	Good	Not good	Transparency shows the motivation of the government.

In small emerging democracies, media morphed from functioning as the propaganda tool of the authoritarian state to being unfettered. The common phenomenon in all the four countries studied—Bhutan, Timor-Leste, Slovenia, and Macedonia—was that media tended to be a hotly contested arena during and after the transitional period. With the opening of the media market, new players entered the free market in hopes of financial or political gain. Many investors were also encouraged by freedom of expression. Soon, without noticing that the media market was saturated, too many media players were struggling for survival. This phenomenon was evident in the four countries studied, where media companies could hardly be financially self-sustaining in small markets with small population. This basically describes the origin of the puzzle in media landscape in four countries.

The tardy development of media policy aggravated the disorder in media market, a common factor in four countries. Even where the legislation has been promulgated, there is likely to be a delay between legislation and initial implementation; that is, there is a difference between formal rules and norms and what people actually do (O'Donnell, 1999). Usually, when a country turned democratic, legislation in almost all social sectors was left behind at the advent. Even if freedom of expression has been guaranteed by constitution in some countries, the rights and responsibilities of journalists may be disputed (Veltmer, 2013). For some countries, although they have passed new media legislation, what has been put into practice is not as anticipated, partly because of the inadequate preparation of the society and partly because of poor execution (Trpevska & Micevski, 2014).

Contributions

Although the results are tantalizing and do suggest a revision of the models of media systems contributed by Hallin and Mancini (2004), more empirical work and of more countries are required to arrive at a generalizable model for small emerging democracies.

Based on fieldwork data from four small emerging democracies, the researcher observed that three crucial factors, specifically national identity, media economics, and media governance, are important in deciding media policymaking in such countries. In this regard, this study not only critiques the existent models used, but also contributes in conceptualizing a framework to guide researchers for studying media policy in small emerging democracies.

Based on three models of media systems and media governance framework (Hallin & Mancini, 2004; Ginosar, 2013), the researcher proposes a conceptual framework for media policy in small emerging democracies with consideration of their characteristics marked by “smallness” and “emergence.” This framework intends to enable a better understanding and deeper analysis of these countries’ media development in order to draft media policy that better fits their specific state circumstances. Besides, the researcher provided implications on media policymaking. This has the practical meaning when some countries are in the similar situation. The findings, to some extent, fill the knowledge gap of media policy research that seldom concentrates on small emerging democracies. Also, the framework of media policy offers an analytical tool in describing, criticizing, and comparing media policy in different countries.

Little previous research focuses on this group of countries- small emerging democracies. For researchers who are interested in media policy for small emerging democracies, this study could serve as a useful perspective to looking at media landscape of the four countries. Additionally, this study highlights crucial elements of these countries' media development and provides a distinctive conceptual framework of media policy to analyze and compare countries sharing similar concerns. The followings are specific contributions made by this study:

The present study has confirmed and tested the existing framework of media governance of Ginosar's (2013). It shows that mode of governance in small emerging all falls in the hierarchical mode of governing. Informal institutions and formal institutions in these countries have not formed an arena for discussing, formulating, and implementing media policy. Cooperation among multiple stakeholders is missing, since the missing role of mechanism that ensures multi-actor and multilevel governance.

This research raises a need to look at media policy in a different way, which is media policy should be adapted or adjusted to ensure the media function in small emerging democracies as well. The small size and other characteristics of these countries should be taken into account. Values and principles for formulating media policy are identified and provided as implications to guide other countries as well. This research also serves as a new perspective of studying media policy to look beyond the unitary framework.

Rules of competition are as important as values of freedom of expression for countries at the advent of democratization. Media deregulation

and liberalization on media market was prevailing across the countries studied that followed the Western model of the media (Štular, October, 2014). However, it could not be borrowed entirely without considering the restraints as of small size and incipient of stage of democratization. Based on data showed in previous chapters, this study raises the attention for other researchers on the importance of fair competition.

Rules of advertising placement should be clarified and specified based on this study. The four countries lack the criteria of placing advertising. This is not only the case in Bhutan, where the government allocated advertising by rotation, rather than auditing on circulation and reach of media, this is also the case in Slovenia, Macedonia, and Timor-Leste, where no criteria could be referred to when allocating resources by the government. This should be highlighted in the formulating of media policy at the beginning of a democracy.

Based on the mode of governance raised by Ginosar (2013), the researcher raises that pluralism, characterized by cooperation between formal and informal institutions and participation of multiple stakeholders (civil society, private sector etc.), is demanded in the countries with the same concerns. As these are small developing countries, the open process of discussing, formulating, and implementing media policy among diverse stakeholders can ensure the equity and transparency of process and therefore a better outcome of policymaking eventually.

From a practical perspective, this study may have far more implications. Policymakers could formulate media legislations to ensure the platform for the public to attain input from different stakeholders, from which the country could

benefit in a long run. Lessons could be learnt from cases that the researcher described and criticized. Some successful policy initiatives could be drawn on.

Limitations

This study is based on fieldwork in Bhutan, Timor-Leste, Slovenia, and Macedonia. They are small emerging democracies in East Asia and Southern and Central Europe in the “third wave” of democratization. Although this research extensively considered the common peculiarities of small emerging democracies, some findings may not be applied wholesale to other regions, where the context might be different. Recommendations are likely to require adjustments before application in other regions.

Data collection from four countries was not congruent because of difficulty in access. The researcher had tried to contact potential interviewees from media organizations, media enterprises, and the government. However, the imbalance among the number of interviewees from different countries could not be avoided. Mixed methodology was therefore used to supplement in-depth interviews in the countries with less available interviewees. Fortunately, the result of the textual analysis on policies, media legislations and government documents accorded with findings.

The difficulty in accessing official statistics for state advertising and annual reports makes it impossible to accurately evaluate the role of the government in advertising in each country. The finding that smaller countries are more likely to be dependent on government advertising could do with more definitive and accurate data for confirmation.

Future Studies

With limited resources of time and finances, only four countries could be covered in this research. More countries could be included in the future research to broaden the width and depth of the study on media policy.

APPENDICES

Appendix A. Guideline of Interview (Newspapers/TV/Radio) (Timor-Leste)

Opening of Interview:

- ✓ Brief introduction of the interview purpose:
 - Thank you for your time and for your help. Your participation will be valuable to our study. The aim of our interview is to gather the information regarding media development in Timor-Leste. Your name and relevant information will be kept confidential and will not be released by us. If you find you don't want to answer any of the questions, please let me know and we can stop at any moment;
- ✓ Clarification of doubt if any;
- ✓ Signing the Interview Consent Form.

1. General Background of Interviewees

- ✓ Welcome and thank you for accepting this interview.
- ✓ Shall we start it with your name and occupation? Could you please briefly describe your job for us? When did you start working here?

2. Context

- ✓ Would you please briefly introduce the newspaper/TV station/Radio station to us?
 - When did the newspaper/TV/Radio start?

- Is it state-owned or private?
 - How many people are working here?
 - What is the circulation of your newspaper (for newspaper only)?
- ✓ What **role** do media play in this new democracy?
- ✓ What is the **education background** for most journalists in Timor-Leste?
- Do you have any ethical code for journalists to follow?
- ✓ Do you have any **training** that is designed for journalists? Do universities in Timor-Leste have the major of communication and information?

3. Culture

- ✓ How do you **see yourself** as Timorese? How do you distinguish yourselves from neighbouring countries? What is the **major difference** between you and your neighbouring countries?
- ✓ What **language** do you mainly use **in your newspaper/TV/Radio**? What language do you use **at school**?
- ✓ What is the **major content** of your newspaper/TV/Radio? What kind of content of your newspaper can give people **a sense of national identity**?
- ✓ Is the protection of national culture **one theme** of your newspaper/TV/Radio? How does your newspaper/TV/Radio emphasize the **history and culture**?
- ✓ What is **the penetration of the Internet**? Do you think in what form has the Internet enhanced the value of national culture?

4. Freedom of Expression

- ✓ How do you get *access to information* in Timor-Leste?
 - What biggest obstacle in accessing the information?
 - Has the circumstance been improved during the past few years?
- ✓ As freedom of expression has been guaranteed in the Constitution, how does it work in practice? Can journalists express their viewpoints freely?
- ✓ Do you have a *platform* for people to realize their rights to expression?
- ✓ Since Timor-Leste is a *small country* with around one million people, everyone has a high chance to know everyone. Do you think people would be reluctant to talk freely? Do you think the smallness of a country will influence the extent to which people express themselves?
- ✓ Since the *draft media law* was passed, do you have any comment on it?

What do you think is the influence towards *journalists*?

 - Do you think the draft law *restrict the freedom* for everyone to access, receive and distribute information?
 - Since *freelance and independent journalists* have been excluded from professional journalists according to the draft law, what do you think the influence of the draft law to them?
 - Many people argued that it limits the rights to information to “*citizens*”. How do you think about Article 3?
 - Someone is worried that the proposed Press Council has been given excessive power such as punishing journalists

or media organizations. What is your opinion to this issue?

5. Economics of Media

- ✓ Is the newspaper/TV/Radio *profitable*? Who is the *biggest advertiser*?
- ✓ What do you think is the influence towards the newspaper as the government is the biggest advertiser? Does the government follow any rules to allocate benefit?
- ✓ How do you play the role of *watchdog* under such circumstance?
- ✓ Where are the newspapers printed? Do you have your own *printing plant*? (for newspaper only)
- ✓ Do you have the intense *competition* in newspaper market? What do you think leads to this situation (for newspaper only)?
- ✓ Is media concentration an issue in Timor-Leste due to its small size and limited number of media players?
- ✓ Having so many projects and *international donors*, do you think the achievement of independently *sustainability* possible?
- ✓ Because of the small size of the Timor-Leste market, it may sense for companies to share some *common resources*. For example, **TV companies** could share broadcast towers; **mobile phone companies** could share mobile communication towers; **newspaper companies** could share printing and distribution facilities. *How likely* do you think it would be for the media and telephone companies in Timor to cooperate?

6. Governance

- ✓ Many people would say that it is important for the media to be independent and so a regulator is needed to ensure its independence.

What do you think?

- ✓ Is the media regulator independent?
- ✓ As Timor is a small place and everyone knows everyone, how possible is it for the media regulator to be made independent?

Guideline of Interview (Media Officer) (Timor-Leste)

Opening of Interview:

- ✓ Brief introduction of the interview purpose:
 - Thank you for your time and for your help. Your participation will be valuable to our study. The aim of our interview is to gather the information regarding media development in Timor-Leste. Your name and relevant information will be kept confidential and will not be released by us. If you find you don't want to answer any of the questions, please let me know and we can stop at any moment;
- ✓ Clarification of doubt if any;
- ✓ Signing the Interview Consent Form.

1. General Background of Interviewees

- ✓ Welcome and thank you for accepting this interview.

- ✓ Shall we start it with your name and occupation? Could you please briefly describe your job for us? When did you start working here?

2. Context

- ✓ Would you please briefly introduce Timorese media to us? Who are the major players in the media market? What challenges do Timorese media face?
- ✓ Would you please briefly introduce ***your role*** in media for us? How does your department function? Could you briefly explain
- ✓ What ***improvement*** has media made since the independence of Timor-Leste?
- ✓ What is the ***education background*** for most journalists in Timor-Leste? Do you have any ethical code for journalists to follow?
- ✓ Do you have any ***training*** that is designed for journalists? Do universities in Timor-Leste have the major of communication and information?

3. Culture

- ✓ How do you ***see yourself*** as Timorese? How do you distinguish yourselves from neighbouring countries? What is the ***major difference*** between you and your neighbouring countries?
- ✓ What ***language*** do you mainly use in ***media***? What language do you use ***at school***?

- ✓ What is the *content* of TV programme? What kind of programme do you think can give people *a sense of national identity*?
- ✓ I know that music and dance of your country is important in building national identity and reflecting your history, so does TV play any music and dance programme emphasizing your history and culture? What kind of media products do you *import* to Timor-Leste?
- ✓ What is *the penetration of the Internet*? Do you think in what form has the Internet enhanced the value of national culture?
- ✓ There is spill-over of TV signals from Indonesia and Australia. These would have higher production quality. How attractive are these programmes for Timorese? How is Timorese culture affected? How do you try to *maintain Timorese culture*?

4. Freedom of Expression

- ✓ How do you get *access to information* in Timor-Leste?
 - What *biggest obstacle* in accessing the information?
 - Has the circumstance been improved during the past few years?
- ✓ As freedom of expression has been guaranteed in the Constitution, how does it work *in practice*? Can journalists express their viewpoints freely?
- ✓ Do you have a *platform* for people to realize their rights to expression?
- ✓ Since Timor-Leste is a *small country* with around one million people, everyone has a high chance to know everyone. Do you think people would be reluctant to talk freely? Do you think the smallness of a country will influence the extent to which people express themselves?

- ✓ Since the *draft media law* was passed, do you have any comment on it?

What do you think is the influence towards *journalists*?

- Do you think the draft law *restrict the freedom* for everyone to access, receive and distribute information?
- Since *freelance and independent journalists* have been excluded from professional journalists according to the draft law, what do you think the influence of the draft law to them?
- Many people argued that it limits the rights to information to “*citizens*”. How do you think about Article 3?
- Someone is worried that the proposed Press Council has been given excessive power such as punishing journalists or media organizations. What is your opinion to this issue?

5. Economics of Media

- ✓ Is the newspaper *profitable*? Who is the *biggest advertiser*?
- ✓ What do you think is the influence towards the newspaper as the government is the biggest advertiser? Does the government follow any rules to allocate benefit?
- ✓ Where are the newspapers printed? Do they have their own *printing plant*?

- ✓ Do you have the intense *competition* in newspaper market? What do you think leads to this situation? Is media concentration an issue in Timor-Leste due to its small size and limited number of media players?
- ✓ Having so many projects and *international donors*, do you think the achievement of independently sustainability possible?
- ✓ Because of the small size of the Timor-Leste market, it may sense for companies to share some *common resources*. For example, *TV companies* could share broadcast towers; *mobile phone companies* could share mobile communication towers; *newspaper companies* could share printing and distribution facilities. *How likely* do you think it would be for the media and telephone companies in Timor to cooperate?

6. Governance

- ✓ Many people would say that it is important for the media to be independent and so a regulator is needed to ensure its independence. What do you think?
- ✓ Is the media regulator independent?
- ✓ As Timor is a small place and everyone knows everyone, how can the media regulator be made independent?

Appendix B. Consent Form

Consent Form

Dear Participant,

Thank you for agreeing to participate in this research. Your participation is highly appreciated. Before the interview starts, I would like to point out the following things:

1. Your participation in this interview is entirely voluntary.
2. You are free to refuse to answer any question at any time.
3. You are free to withdraw from the interview at any time without suffering any disadvantage.
4. The interview will last approximately one hour or less.
5. The interview will be audio-recorded for research purpose, and the interview data will be kept highly confidential.

I would be grateful if you would sign this form to show your consent to participating in this interview.

Yours Sincerely,

Ang Peng Hwa & Cao Yuanyuan

☐ I consent to participating in this interview.

☐ I do not consent to participating in this interview.

Participant's Name & Signature

Date

Appendix C. Tables of Interviewees

Interviewees in Bhutan

Name	Occupation	Email	Mobile
Dorji, Dasho Kinley	Secretary Ministry of Information and Communications		
Dorji, Tenzin	Managing Director <i>Bhutan Today</i>	ten.doxin@gmail.com	975-02-336806
Dorji, Thinley	Managing Director Bhutan Broadcasting Service (BBS)	thinley.dorji@bbs.com.bt	975-02-323580
Gyeltshen, Sherub	General Secretary Motion Picture Association of Bhutan	gsmpab99@gmail.com	975-02-331715
Norbu, Namkhai	Managing Director <i>Bhutan Times</i>	nnamkhai@hotmail.com	975-02-351276
Phuntsho, Sonam	Director Bhutan InfoComm Media Authority	sphuntsho@bicma.gov.bt	975-02-322346
Tenzin, Ugyen	Editor <i>Bhutan Today</i>	uktenzin@hotmail.com	975-02-336806/4
Tsewang, Monira A. Y.	Chief Information & Media Officer Department of Information & Media Ministry of Information & Communication	monira@doim.gov.bt	975-02-331299
Tshering, Chencho	Managing Director <i>Kuensel</i>	md@kuensel.com.bt	975-02-323043
Wangmo, Phuntsho	Chief Executive Officer <i>Bhutan Observer</i>	ceo@bhutanobserver.bt	975-02-334891

Interviewees in Timor-Leste

Name	Occupation	Email	Mobile
Cardoso, Suzana	Director Media Trust Fund Foundation (FFM)	azanatl@gmail.com	+670 7724 2944
Costa, Tito de Jesus Filipe da	President Timor Lorosa'e Journalist Association	tierna201@yahoo.com	+670 77327265
Evaristo Soares, Luis	Director Center for Radio Community (CRC)	levaristosoares@gmail.com	+670 77230126
Fernandes, Hugo	Senior Media Observer Timor Lorosa'e Journalists Association Director of Public Policy Program The Asia Foundation	hfernandes@asiafound.org	+670 7723 0926
Garcia, Rosa	Journalist Editor <i>Timor Post</i>	rosa_cia@yahoo.com	+670 7723 8278
Lopes, Mouzinho	Director <i>Jornal Independente</i>	mouzinholopez@gmail.com Independente.Redasaun@gmail.com	+670 7726 3752
Oliveira, Jose Luis de	Human Rights Activist and Senior Media Observer	lurumata@gmail.com	
Silva Gari, Francisco da	Director Timor Leste Media Development Center TLMDC	francisco@tlmdc.org	+670 7723 5163
Silva Guterres, Julio Gil da	Executive Director The Mirror for the People (LABEH: Lalenok Ba Ema Hotu)	gil.silva@labeh.org	+670 7728 9198 +670 7330 9444 (private)
Silva Guterres, Virgilio da	Senior Media Observer Past chair Timor Lorosa'e Journalists Association	lamukan@gmail.com	7796 1515 73111128
Ximenes, Prezado	President Radio Community Association of Timor- Leste	prezado_revolta@yahoo.com	+670 7723 9945
Pereira, Joel Maria	Media Adviser to the Deputy Prime Minister of RDTL (Democratic Republic of Timor- Leste)	joel.riko@gmail.com	+670 7723 0160

Interviewees in Macedonia

Name	Occupation	Email	Mobile
Anonymity 1	Professor International Balkan University	info@ibu.edu.mk donakp@gmail.com	00389 (02) 3214-831 00389 (75) 395410
Babunski, Dr. Klime	Assistant researcher ISP JR	klimeb@ispji.ukim.edu.mk	00389 (02)3061 119
Caushidis, Tamara	Independent Union of Journalists	tamaramak@yahoo.com ;	00389 (02) 2671-201 00389 (75) 353-353
Georgievski, Dejan	President Media Development Center (MDC)	dejan@mdc.org.mk	00389 (02) 3136-340
Marusic, Sinisa- Jakov	Journalist Balkan Investigative Reporting Network	office.macedonia@birn.eu.com	00389 70 214 970
Petkovska, Biljana	Macedonian Institute for Media (MIM)	bb@mim.org.mk	00389 (02) 3090-144
Sekulovski, Dragan	Executive Director Association of Journalists of Macedonia (AJM)	dragan.sekulovski@gmail.com	00389 (02) 3298-139
Sopar, Vesna	Professor Communication School of Journalism and Public Relations	soparv@gmail.com	00389 (70) 506-763
Stojanovski, Filip	Program Director Metamorphosis Foundation	filip@metamorphosis.org.mk	00389 (02) 3109-325
Trajcevski, Zoran	Agency for Audio and Audiovisual Media Services	contact@avmu.mk	00389 (02) 3103-400 Private: +38970401310
Trajkoska, Zaneta	Director School of Journalism and Public Relations Institute of Communication Studies	zanat@vs.edu.mk	+ 389 2 3090 004
Trpevska, Snezana	Senior Lecturer Institute of Communication Studies	strpevska@vs.edu.mk	00389 (02) 3090-004

Interviewees in Slovenia

Name	Occupation	Email	Mobile
Milosavljević, Marko	Chair Department of Journalism Faculty of Social Sciences University of Ljubljana	marko.milosavljevic@fdv.unilj.si	
Oblak, Leo	Chief Executive Officer Infonet Media	Leo.oblak@infonet.si	+386 1 242 56 30
Štular, Mirko	Managing Editor VAL 202 Radio Slovenija	mirko.stular@rtvslo.si	

Appendix D. An Example of Interview Transcripts

Interviewee: Dr. Petkovska, Biljana

Location: Macedonian Institute for Media (MIM)

Time: 29 Oct 2014

PH: Ang, Peng Hwa

Y: Cao, Yuanyuan

B: Petkovska, Biljana

PH: 5 million is still a very small market. Singapore has 5 million, it's a very small market. Which means that actually the media policy from the west are not applicable to almost half of the countries in the world. Media policy in the west says that we should be financially free and all that. But even places like Scandinavian countries, they subsidize the media. It became interesting. Bhutan was first. Then we went to Timor Leste, population was 1 million, literacy was very low, 50 percent kind of thing. The best newspaper charges \$600 for full-page advertisement. But circulation was 1850 on a best day. Subscription plus news stand sales. So it's very expensive, the most expensive in the world. \$600 for 1850. So that's what we're trying to see. We looked around. We met Sally Broughton, so I met her last year, on a project, she was talking about this as well. Let's connect, Macedonia, that's why we kind of followed up. And then she was from Slovenia. So we have projects looking at media policies of small countries. Singapore is also a small country, 5 million. But I can see some of the issues that are there are not controlled directly, not intentional, but simply because of the size of the market.

B: In fact, in the region there is even one country which is smaller than the two of us, it's Montenegro.

PH: We were surprised. But Montenegro is not part of Serbia, isn't it?

B: No, it's an independent state. It has around 700,000 citizens in total for the whole country. All this region used to be part of a big country, Yugoslavia, so now they're very small countries. I think I sent you a link to this media observatory, they're some information...

Y: Media integrity matters?

B: Yes yes. There are some aspects there that are interesting. But these are general trends of the media systems in the countries, in this part of the world. During 2015 and 2016, it will be Turkey, Montenegro, and Kosovo, which is also a very small, I mean it has problems with... Is it really a country, is it not? But as a part of the region, they will also be included in this research to continue to work on for the media integrity.

PH: Was Slovenia included because...

B: No, Slovenia was managing the whole process, but the research is not cover Slovenia because they're part of European Union. But it requires that they are actors of EU member state, which are involved in the process, but research cannot be done to cover EU countries. It is covering what is called the EPA region, for you mean the enlargement region, the countries which are candidates to join the European Union.

PH: So tell us about your institute, it started in 2001, so what was the media training before 2001? How were journalists trained?

B: Before that, there was not an organized approach, nor specialized training institution in the country that could provide training for media professionals.

PH: Was there no university?

B: There were universities, but then it was pure academia.

PH: You mean you don't teach journalism writing.

B: The thing is many journalists working in the newsroom do not have formal education in journalism, it's not a requirement. That is why there is a need for specialized training institution to provide training in journalism and other types of media professionals. And there was a broad consensus in the media sphere that such an institution should be set up. And we have a lot of support from the Danish school of journalism in Denmark. And in a way the institute was set according to the format of the Danish school of journalism, but of course, adapted in a way accommodated to local circumstances.

PH: What are some of the distinctive characters of the Danish school?

B: Danish school quite an important institution in Denmark that provides training for journalists, but also for other segments within the media... newsroom for technical staff, more advanced positions, editors, directors, a lot of profiles within the media, within the newsrooms. They are in a way, how should I say, they are like a state supported institution. And it's profile of institution that is known for providing on-hands, very practical education, not so much academia, without very scientific approach.

Y: Did you provide training for journalists from 2011? Your institute?

B: Yes. First we have created a pool of local trainers, who went for programs to train the journalists. These programs were delivered mainly by the experts from the Danish school of journalism. But also we had some American people coming.

Y: So you have very close relationship with the Danish school? So this is not a university for journalism?

B: The institute is not a university for journalism, but it's a non-profit organization which is registered. But like Non-Governmental Organization. So we provided, we still provide, although now in a very limited scope, a lot of trainings for journalists. Once we built these capacities for the trainers. We organized a lot of trainings first, in the beginning the trainings were of shorter format, very focused one on particular issue. After second period of time, it was concluded from the experience and the research we did that it was needed a more professional program with longer programs, that last like 6 months or 1 year to be established. And then we developed such program. There was quite a lot of interests among the media community to attend those programs. They were interested. The most successful was one diploma program in journalism which we created, and on this program, we had participants like people who already worked in the media, but didn't a proper education in journalism before. Maybe they finished some other types of universities, but are interested to work as journalists.

Y: Their major might not be journalism?

B: Yeah.

Y: So what are the educational backgrounds of journalists here in Macedonia?
Are they all coming from journalism school?

B: No, there are different types of educational background. Some journalists have major in journalism. It's either from the state university or school of journalism, but that's not I would say a dominant trend, because there are many who either have formal education in some other disciplines, like history, philosophy, literacy, languages, and they have decided to work as journalists. But also you can find people who unfortunately don't have a proper high education. They have not completed their high education but instead, well, they were students, they have started to work as journalists, and unfortunately they have never completed education.

Y: Different various background? So how many different journalists have you trained in your institute?

B: I cannot tell you now the exact number, but considering that...

Y: Is the number growing year by year?

B: Yes, it was growing year by year, until you have to have in mind that the institute Macedonia media institute, was more focused on the training. And training was its main occupation since it was established in 2001 to 2008, when we established the school of journalism and PR. So most of the training one is provided by the school. And the institute now, although we still provide trainings, the trainings we do are not always strictly related to journalism, although we still keep that. We also provide training to students in high schools, basic schools, on let's say integrated education using multimedia tools to bring

closer people with different ethnic backgrounds, to overcome stereotypes, prejudice, because this is one of the challenges of our society, we're pretty much mixed in terms of ethnical composition of the people and that sometimes causes troubles.

PH: It's not media per se. I mean the issue of ethnic relations. It's not really media. So, how is that funded?

B: Well, it's politicians for making the mess, usually. But that has a reflection on the... Because they're setting role models and these role models sometimes xxx (13:35), negative impact on the way young people especially perceive diversity. And sometimes there are problems, meaning that some students let's say from Macedonia, Albania, these are the two dominant ethnic groups, refuse to sit in classroom. That is not a trend, but it happens, unfortunately it happens. Language is a barrier, because there is a huge difference between the Albanian and Macedonian language. Macedonians generally do not speak Albanian.

Y: But Albanian can speak Macedonian?

B: Yes. Well, Albanian communities smaller, around 25 percent, Macedonians is 60 something. These kind of projects we do, but lately because the Macedonian media situation has become a bit complicated for the past few years. We are trying to contribute to solving the ongoing issues. And we are now more focused on the analyzing lobbying, advocating, for changes related to the way the whole media situation in the country operates. And for that you can find more in the media integrity book. You will see that in general we, although we have good laws related to the media, unfortunately the reality and the practice is not so favourable for quality journalists. There is a very sort of absurd trend

which says that while the country is getting closer formally to EU standards, because integration in the EU is highly on the agenda of the country. So while legislation is improving, so on, the practice is something different. There is a lot of self-censorship, non-functional media market in the country, quite a lot of dominance on the government itself, and the ruling political party, on advertising market for media. They are among the top five advertisers in the broadcasting media.

PH: But if you do cut... Let's talk about cutting government advertising for the campaigns. But if you do cut that, it will mean a smaller media market. So the journalists will be affected.

B: Yeah, anyway journalists are affected. You see if you have a look at the market in our country, it's a small poor market, very small, very poor, but with a lot of media in terms of media number. It's not sustainable definitely. There is absence of transparency, real transparency.

Y: Of the media ownership?

B: Media ownership, also sources of funding are problematic. The expansion of internet media is also a problem, because there is a lot of... There is non-existent of transparency there. And you see, there is this challenge while how to put this balance when you have absence of transparency by all segments, meaning funding, ownership, from one one hand. And on the other hand, when you have so much of governmental influence in the media market, which is a confirmed even in the European Union progress report for Macedonia, which was released a couple of weeks ago. You can find it on the website of the delegation of European Union. And there are findings on the media situation.

The European Union is every year publishing the progress reports of the countries who would like to join the EU. And then assess according to their criteria where we stand. And this year the progress report related to the media is pretty much negative. The European Union is pressing that this is now one of the biggest problems and challenges for the country, together with the rule of law, where we also saw a lot of problems unfortunately. This is a fact that we have an unsustainable media market and the problem is not since yesterday, since not this government came in power, it is because, I would frankly say, that the political elites that we have, they never had understanding for providing conditions for proper development of the media market according to best worldwide standards, European practices, and driven potentially from the need that you really need to have media that would support democracy, respect for human rights and so. But instead, almost political elites we have had in power, and we still had it, would like to use media for their own political purposes. There is corruption. When you have so much influence from the government directly on the media market, it is obvious that it is not very healthy for the development of the media system.

PH: You were talking just now about the transparent, non-transparency in funding, ownership. But ownership, I thought ownership is clear. Is it not clear? Or is it hidden?

B: They are hidden owners. The laws are requesting that ownership data are regularly updated by the agency of media. But they are... You will see that there is a lot of hidden ownership behind what is stated. And then fortunately the agency for media until now did not provide proven records that they are dealing with this issue. Although, this problem is more relevant for internet

media, not so much for broadcasting media. It is more for internet media, but internet media in here...

PH: But internet media is very small, I mean I know it can be hidden, but they are very small in terms of impact.

B: That is true, but sometimes they can really make troubles.

PH: No one has mentioned that, you are the first person. But we keep on asking about social media, and everyone said no impact.

B: I wouldn't ignore that because on Internet media... I'm not talking about social, like portals online. They are used here very often by various influential groups, political and economic, but dominantly political, sometimes you know to defocus public discourse, for labelling or offending people, for putting blame on a political counterpart without arguments. But there were tendencies that these parties are also regulated with the new law on media, which we introduced at the end of last year. But there was strong opposition on this proposal from the journalistic community, because they are afraid of further governmental influence on this content, because generally it is considered that these media despite their deficiencies in terms of professionalism and ethical principles, they really have a lot of problems with that. But on the other side, they are considered to be one of the oasis of free journalism, investigative journalism and so on.

Y: So how long have you been here? How long have you been at this position in this MIM?

B: I'm working for MIM since its establishment from the very beginning.

Myself and the PERSON'S NAME (23:56), she's the director of the school of journalism, you met her a day ago. The two of us were involved in setting the institute in 2001. Before that...

Y: So you were director since 2001?

B: No, she was director, and I was a program manager, I was managing programs, reports, and all that stuff. But when we established the school, she moved there to be head of the school, and then I took over the position of director of MIM.

Y: Since 2008?

B: Yes. And I'm on the position since 2008.

PH: Why did you all start this?

B: I completed journalism.

PH: Why did you start the institute? What was the reason?

B: We thought it's very innovative, and useful idea that can bring benefit to the journalists and media in the country. It is something that has not exist before, and we very much believe that it is very much needed. And we are lucky to find partners who help us like the Danish school of journalism.

PH: You give a long impressive list of people.

B: Yes, we worked with a lot of.. We used to work, and we still work with all relevant partners, which have some you know, important in media-related issues. From the whole world, we have worked with a lot of them yes.

Y: And as you talked before, actually the public is controlled by the government, by the state. So we heard that the fear of the government is widely spread actually over the public. How do you see this issue? People think that they don't have the freedom of expression but can we talk in private?

B: To me, the problem is mainly with the fact that there are no proper conditions that real journalism can be pursued, can be further developed. Institutions of the country and the state system are not supporting this. They don't recognize the value of journalism. This is the trend that is dominating in the last couple of years, especially after one very big unfortunate case we had in 2010 when the government decided to shut down the biggest and most influential TV station in the country, the A1. And that was made on the basis of a criminal its owners made. That is okay, dealing with criminal is fine, but unfortunately, the government from the very beginning when they started these actions against A1, they said that A1 is not our target, but it is the owner, but at the end the owner was put in jail and TV station was closed down.

PH: Was it because if A1 was profitable...

B: It was very profitable, but this guy was also had problems with his criminal activities. He was avoiding paying taxes. Also he was unformally owner of a printed media. And that was against the law. But unfortunately, the politicians were tolerating for him for many years, because his media was very influential, and they wanted to have him on their side. But after some years, he also set up his own political party, and wanted to be partner of the government. They had quarrels there. And then who is most powerful? Of course it's the Prime Minister. They couldn't reach obviously an agreement how to deal with this

political partnership. So the government decided to open the case, and there was a trial, investigation, they found evidences based on which he was sent to prison. And with the group of many other people who worked for him as well. And unfortunately the TV station was closed down, along with these couple of newspapers that were owned by him. This is the point where Macedonia media system lost turn into a totally new era, I would say. That was since 2010, and for the last four years, it is really difficult. This affected the whole media system. It restructured it because A1 and these newspapers close to A1 were leading on the market. And of course there were a lot of appetites from other TV stations to take over this leading position. But the thing is that, the next two, Sitel and Channel 5, which are also national TV station with biggest influence, they are also owned unformally by politicians. The law forbids that a person that is holding important position in the society, in the state institutions like member of parliament, member of government...

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