

Mass media and media policy in Western Europe

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European public-service broadcasting systems

Until recently a public-service monopoly, or duopoly in Britain's case, has characterised nearly all the broadcasting systems in Western Europe (Luxembourg being the significant exception). Within this public-service paradigm, however, there long existed important national differences in the way broadcasting systems were traditionally organised and controlled. This chapter looks first at the 'universal' principles of public-service broadcasting developed in Western Europe, then more closely at distinctive national variations. It will show that the different national models can be explained, to an important degree, by reference to the different political contexts – historical, cultural and institutional – in which they have been embedded. A marked congruence can be demonstrated between structures of broadcasting and the particular character of the respective political systems. In the past at least, politics has played a key role in defining the shape of national broadcasting systems and, not infrequently, in intruding upon the broadcasters' freedom. The next chapter will examine how this primacy of 'politics', in the shape of different patterns of public regulation and state intervention, is giving way to the primacy of markets. For reasons of space, the focus will be on television; it should be pointed out, though, that the more historical content of this particular chapter refers to radio.

The three rationales for public regulation

Radio broadcasting developed during the early part of this century; television became a mass medium after World War II. The main dif-

ference, from a public policy perspective, between the broadcast media and the press has been that both radio and television have been subjected – more or less from the beginning – to comprehensive and strict regulation. The broadcasters have been controlled and licenced by the public authorities. Moreover, from the very start, broadcasting has been regarded as an entirely legitimate field of public policy intervention. There are essentially three sets of reason for this: one is technical, another economic, and the third is political.

The technical rationale for regulation

Radio broadcasting in Europe commenced as a mass-medium during the 1920s following the huge stimulus that the radio industry had received from the use of radio during the Great War. In some countries – such as Britain, Belgium, Norway and Denmark – radio broadcasting was started by the private sector as in the United States (where it has remained a private sector activity ever since). In Switzerland, on the other hand, it was launched by a number of smallish public corporations serving distinct localities and based in the larger cities. In Sweden too, radio broadcasting began as an exclusive public service monopoly of the Swedish Broadcasting Corporation. In some cases, most notably Germany, radio developed under the auspices of very tight state control. This was also true of the state radio service in France, although in that country an unofficial private radio sector was tolerated alongside it until the post-war period. Whatever the case, though, there was one common denominator. Since radio as a technology grew out of telephony and telegraphy, it remained very much under the influence of state postal, telegraph and telephone authorities (PTTs). Moreover, the state (through the PTTs) 'owned' and administered the airwaves.

European PTTs were quick to draw the lesson from the United States experience where, so rapid and uncontrolled was the growth of private radio stations there soon resulted a chaotic overcrowding of the airwaves. Accordingly, European PTTs commonly took steps to control access to the medium through the power they retained to award broadcasting licences if they did not control the broadcasters outright. In Britain, for example, the Post Office took the decision in 1922 to establish the British Broadcasting Company as a cooperative venture owned by the radio industry. By this means, it was hoped at

first to permit the continuance of commercial enterprise and at the same time to avert the free for all that characterised the United States. The Post Office successfully obtained the compliance of the private radio concerns by employing carrot and stick tactics. The stick was its power to withhold broadcasting licences; the carrot was its ability to grant monopoly rights to this private commercial 'cooperative' that was the BBC in its early days. Moreover, as elsewhere in Europe, it offered the blandishment of generous and assured funding from the broadcasting licence fee payable by all citizens who owned radio sets. The main point, however, is that, whether the state immediately established a public monopoly or not, one important rationale for closely regulating broadcasting was technical: the need to ration access to the medium because of the relative 'scarcity of frequencies'.

The monopoly rationale for regulation

Clearly, once a monopoly is granted or market access is rationed there arises a powerful economic rationale for public regulation. It was necessary to ensure universality of service provision and to avoid a situation where only densely populated areas were provided for. Further, the press could be granted its exceptional freedom from regulation precisely because it was characterised, at least in principle, by a free and competitive market. The situation with broadcasting was obviously very different. The listeners, and later the viewers, were captive audiences. Public intervention was therefore required to guard against all the familiar abuses of market dominance, most notably monopoly pricing and the retailing of 'inferior products'. Clearly, the broadcast media established a relationship of dependency on the part of the consumers. The latter could not pick and choose among a wide range of products to the same extent that they could with regard to their newspapers and magazines. There was therefore a powerful public interest rationale for public regulation of media content in order to ensure the quality and diversity of programmes. In the 1930s, and for some time after the war as well, regulation held the broadcasters accountable to what the authorities and traditional elites deemed to be suitable public taste. From the 1960s onwards, the broadcasters obtained more freedom and it was considered crucial that a wide range of social groups and categories would be catered for.

Finally, the media obviously had the ability powerfully to influence people's behaviour. One very important aspect of broadcasting's behavioural impact was its evident ability to influence consumer buying habits; it was a marvellous medium for advertising. In a monopolistic or quasi-monopolistic context there was clearly an economic rationale for an important measure of regulation, and not merely to govern advertising standards and practices. Since broadcast advertising represented a potentially serious threat to the publishers' main source of revenue, the public authorities soon faced a militant demand from the press sector – typically a very influential lobby indeed in view of its commercial size and its customary political connections – for a very strict regulation of the broadcasters. In Austria, Sweden and Switzerland, for instance, the press lobby has even been a key insider actor in the broadcasting policy community, granted very privileged rights to co-determine official policy. Indeed, not least for this reason, European broadcasters have long had to content themselves with strict limits – sometimes even a complete ban – on carrying advertising. As will be seen later, this situation is changing dramatically now.

The political rationale for regulation

The behavioural impact of broadcasting was obviously not limited to consumer buying habits. It quickly became clear to those who wielded, or contended for, political power that the broadcast media had a very effective capacity to focus public attention, to contribute to the creation of public opinion, to legitimise (or de-legitimise) public policy, and even directly to influence voting behaviour. Politicians and public administrators soon became aware that, unchecked or unconstrained, the medium presented a potential threat to their public authority. Enlightened elites were equally alert to the medium's vulnerability to political misuse (not least since the state rationed the air-waves). Indeed, the Nazis' misuse of the medium for the purposes of almost 'total' social control, led those who reconstructed West German broadcasting to stress the need to safeguard the medium's independence from politicians, from overbearing state officials or indeed from any holder of social power. Whether before or after the war, because of its political saliency and extraordinary powers of persuasion, European broadcasting came typically to be subjected to strict regulation according to principles of impartiality

and political pluralism. It became a fundamental ideal of public broadcasting that democratic pluralism should be upheld: that the public-service broadcasters should reflect a range of democratic viewpoints. Yet, the public broadcasters would still have to be held democratically accountable and this requirement was bound to constrain their political independence. Therefore, in practice, as we shall see, European broadcasting exhibited a questionable closeness to the political power holders; in some cases executive dominance was striking, in others politicisation of broadcasters was more balanced. In fact, during the early days of broadcasting, there emerged clearly different national patterns with regard to this key relationship between the medium and the political realm. In this brief historical section, it is useful to examine two contrasting cases: those of Germany and Britain.

In Germany, endowed with Prussia's 'strong state' tradition and its legacy of nineteenth-century authoritarianism, the degree of control of radio broadcasting enjoyed by the political executive was striking from the start. During the liberal-democratic Weimar Republic (1918–33), the *Reichspost* (PTT) not only allocated broadcasting licences but also owned and controlled all the country's transmission facilities. In 1925 this state control was increased even further by the establishment of a centralised Imperial Broadcasting Company in which the *Reichspost* held a majority share of the capital. In these early days of the medium, there were none of the carefully crafted public-service broadcasting laws that have come to be associated with that country in the post-World War II period. Instead, there existed a complex web of regulations and franchises that ensured that the state remained overwhelmingly in control of the medium. The Interior Ministry also exercised a large degree of influence over the medium, not least of all because of its tutelage of the government's central information office upon which the broadcasters were compelled to rely for their news and information. Therefore, the definition of public service that developed in Germany during this early period of the century was one that stressed the role of broadcasting as a function of public administration rather than as an independent self-regulating social activity. The state's grip on the medium had become almost absolute even before Hitler came to power and misused it for Nazi propaganda purposes (Humphreys, 1994, pp. 124–125).

By contrast, in Britain, with its 'weak state' and strong liberal tra-

ditions, a very different understanding of public service regulation emerged during exactly the same period. In 1926 the Crawford Committee – an official government inquiry into the future structure of broadcasting – recommended that the BBC should be run as a public monopoly free from governmental interference. In 1927 the private monopoly of radio concerns mentioned above was duly transformed into the public corporation that we know today. Significantly, the British Broadcasting Corporation was granted a Royal Charter rather than set up by Act of Parliament, precisely in order to establish the principle of its freedom from political dependence. Although the 1926 General Strike showed that the BBC was ultimately compliant to government, the Corporation still 'emerged from the crisis with an ethic of political neutrality ... that was to have profound consequences for politics' (Curran and Seaton, 1991, p. 143). During the inter-war years, under John Reith's leadership, the BBC was a rather autocratic institution that certainly presented a one-sided, Establishment-biased view of politics and society. All the same, through its status as an independent public corporation the BBC was protected from becoming simply a submissive instrument of the political power-holders and public administrators in the German mould. The BBC's war-time role, ironically as purveyor of propaganda and upholder of public morale, served only to heighten its institutional status which, in turn, underpinned its post-war relative autonomy.

Thus, clearly, there was considerable scope for variation among the political rationales for regulating broadcasting. That broadcasting actually required much stricter regulation than the press, both on high moral political grounds and for the sake of political expediency, was beyond serious question. In addition to technical and economic necessity, squarely political determination played an important role.

Is there a model of public service broadcasting in Europe?

Some mixed public/private systems endured until the end of World War II. This was the case, for instance, in France and Belgium. Mixed systems re-emerged fairly early on in the post-war period too in Britain and Finland, but now their commercial elements were constrained within a developed public-service paradigm. The negative experience of the media under Fascism or Fascist occupation had served only to reinforce the need for principled public-service regu-

lation. What, then, constituted this 'public-service' mould? Already we have gained a brief insight into how interpretations of the concept could vary considerably: according to different patterns of institutional development and political tradition. As with the press sector, European countries' broadcasting systems have been shaped by other factors too, such as (market) size, language community, socio-political cleavage structure, and the lessons of history (eg. in the German case). In what ways these various factors produced distinctive features among the national systems will be examined in the course of this chapter. First it is necessary to consider commonly shared public-service features.

Two conceptual models provide helpful guidance (see Table 4.1). Blumler (1992, pp. 7–21) has suggested that a European public-service model can be defined, in contradistinction to the market-oriented American model, by six shared features. Blumler's six features are a very clear statement of the existence, at least at a general level, of a distinctive European public-service model. Another helpful, and much cited, guide to understanding the public service model has been provided by the Broadcasting Research Unit (1986). This latter study refers specifically to the British broadcasting system. Nevertheless, it is still useful to apply it to other European broadcasting systems. According to the Broadcasting Research Unit there are eight principles of public-service broadcasting. It is, of course, important to emphasise that different systems may fulfil these criteria rather differently. Indeed, it is interesting to note that the BRU's 'British' model stresses the broadcasters' independence from government while Blumler's more general model points to their closeness to the political realm.

Blumler's first criterion is what he calls an 'ethic of comprehensiveness', meaning omnibus services supplying educational and informational as well as entertainment programmes (as is well known, the latter predominate in the United States). The BRU's model extends this notion to the idea of geographic universality. This is important. It excludes the notion of 'pay-TV' where services are limited to those who pay a subscription. Public-service broadcasting aims to deliver a wide ranging quality service to the whole population. The monopoly character of the services explains Blumler's second criterion: the requirement that the broadcasters adhere to what he calls 'generalised mandates'. These may assume various forms – for instance, a charter or an act of parliament, a licence or a concession,

Table 4.1 Characteristics of public-service broadcasting: two similar models

Blumler's criteria	<i>The Broadcasting Research Unit's criteria</i>
Ethic of comprehensiveness	Geographic universality – equal access to same services
Generalised mandates	Catering for all interests and tastes
Diversity, pluralism and range	Catering for minorities
Cultural vocation	Catering for national identity and community
Non-commercialism	Universality of payment: system funded by users (i.e. licence fee) Competition to produce good programming rather than audience size Guidelines to 'liberate' programme makers, rather than restrict them Independence from vested interests and government
Place in politics	

Note:

Here, the criteria are not reproduced in the original order.

Sources: Jay Blumler 'Public Service Broadcasting before the Commercial Deluge', Chapter 2 in J. Blumler (ed.), *Television and the Public Interest*, London: Sage, 1992, pp. 7–21; BRU, *The Public Service Idea in British Broadcasting – Main Principles*, BRU, 1986.

– but whatever the case, European broadcasting systems are commonly bound by general statements of their public service mission. Moreover, the broadcasters' compliance with their 'generalised mandates' is policed by special regulatory bodies, either within the broadcasting organisation itself (as in the case of the BBC) or placed above them (like the IBA, which regulated ITV). Blumler suggests that in most European countries these bodies are composed of political appointees. However, as we will see, there may well exist strict legal rules specifying the exact make up of their membership and providing for political pluralism within them. Blumler also notes that, inside the parameters defined by these 'generalised mandates', European broadcasters have had a 'considerable amount of freedom and authority': they have been 'allowed to plot their own courses, so long as they did not steer too closely toward dangerous political reefs

and sensitivities' (1992, p. 9). The BRU's suggestion that the guidelines should 'liberate' programme makers, rather than restrict them, makes creative and innovative freedom a particular specification.

Typically, these 'generalised mandates' provide in one formulation or another the requirement to supply diverse programming, to respect cultural, religious and political beliefs, to cater to cultural variety, to be objective, impartial and balanced in their reporting, to respect principles of democratic pluralism, and so on. In fact, all this is covered by Blumler's third criterion, commitment to 'diversity, pluralism and range' and his fourth criterion, the 'cultural vocation' of European broadcasters. The BRU's model draws attention to essentially the same features: the requirement to cater to all interests and tastes, to cater for minorities, and to cater for national identity and community. These features do not refer only to the programmes. As suggested, a number of European broadcasting systems have elaborate rules providing for pluralistically composed membership of regulatory bodies. As we will see, some countries go to great lengths to ensure that their diverse cultural communities are fairly represented and that their communication needs are met.

Interestingly, Blumler (1992, p. 10) suggests that 'the pluralistic model contrasts with the more majoritarian model of television provision that is fostered by advertising'. Here Blumler is clearly not referring to political majoritarianism whereby election winners 'take all' in terms of state power (including whatever state influence may exist over broadcasters). He is, nonetheless, pointing towards an important way in which a broadcasting system may cater to a social 'majority' rather than a diversity of minorities. In the United States, for example, broadcasting was geared towards audience maximisation: broadcasters sought to deliver the largest possible audience to the advertisers. This state of affairs conflicted with the goals of pluralism, diversity and cultural provision that defined the European public-service model. So 'non-commercialism' was Blumler's fifth criterion. He cast this rather more broadly than the BRU's specification for direct public funding. This was because many European public channels came to carry advertising. However, here advertising was regarded as a supplement to the licence fee and confined to strict limits. These restrictions 'existed to ensure' that the public service broadcasters were 'not compromised in [their] ability to serve the public interest by [their] need to seek revenue' (Lorimer, 1994, p. 81). Luxembourg was the exception to this rule but, as already men-

tioned, Luxembourg did not conform to the European public service model. The main point is that, during the long period of public-service supremacy in Europe, reliance on supplementary advertising was not allowed to 'marketise' the broadcasting system. The British duopoly broadcasters, as the BRV noted, did not compete for the same revenue source; allowing them to compete for quality.

Blumler's final feature is concerned with the European broadcasters' 'place in politics'. He refers to the broadcasters as 'creatures ultimately of the state' rather than of the market as in the United States. He notes that the European public service broadcasters have tended to have a very close relationship with the political realm. There are some very positive aspects of this feature. Blumler acknowledges that broadcasters have contributed much to the 'health of the political process and the quality of discourse generated within it'. They have accorded a very important place to news, current affairs and political reporting generally; and they are bound by their generalised mandates to maintain a stance of strict impartiality and balance. Careful rules have been elaborated to govern party political broadcasts and the broadcasters' conduct during elections has typically been subject to strict supervision by their regulatory bodies. More broadly, the concept of public-service includes the normative goal of contributing to the democratic process and providing an important check on the political system, for instance by exposing any abuses of political authority.

However, there has also certainly been a negative side to this feature: the tendency to politicisation of the European public-service broadcasters. They may be prone to direct state intervention. The composition of regulatory authorities may reflect a particular political bias; appointments within the broadcasting organisations, even down to the level of producers and journalists, may be politically determined. Blumler certainly characterises them as 'highly politicised organisations' (p. 12). As we will see, this evaluation is unquestionably generally true of European broadcasting systems. Indeed, in the Dutch case it might be said to have been a deliberate choice, even seen for a long time as a positive virtue of that country's system rather than an unwelcome intrusion of the politicians as in so many other cases. However, as Blumler notes it is important to realise that the patterns and extent of politicisation differed considerably across Europe. In this connection it is interesting that the BRU's model stresses instead the broadcasters' independence from vested interests

and government. Here the distinction is partly explained by the fact that the British broadcasters have been generally much more independent of the politicians. Another explanation is that the BRU model is more normative, while Blumler's is more descriptive. Nevertheless, whatever the system, as Etzioni-Halevy (1987, p. 7) has explained in an interesting comparative study of political pressures on broadcasting, broadcasters were always likely to come under some pressure; this arose from the fact that they 'were expected to be both politically independent and politically accountable'. This fundamental tension reflected a 'deep-seated ambiguity ingrained in the role-definition of broadcasting in a democracy' (p. 37). Since we are mainly concerned with the relationship between politics and the media, much of this chapter will be concerned to examine this particular question.

These two lists are not exhaustive. We might add the public-service commitment to professionalism; this includes quality programming and the maintenance of high standards of journalism and artistic production. Indeed, commitment to quality and creativity are implied by the BRU's stress on competition to produce quality programming rather than audience size. This quality aspect is also implicit in Blumler's fourth criterion, the 'cultural vocation' of European broadcasters. Sepstrup (1989, pp. 30-31) adds that this includes obligations to 'produce a substantial part of the programmes nationally' and 'to support the national production of cultural products' (by supporting national artists, maintaining orchestras, etc.). For Western Europe's public broadcasters, to help sustain national and regional cultural production was a very important obligation.

We should also include the principle of accountability to the citizenry. Accountability here is intended in a more generous sense than the simple existence of mechanisms for researching audience preferences and dealing with viewers' complaints. Such mechanisms are important but generally they leave power in the hands of the broadcasters. In addition, therefore, there should be scope for a public input into broadcasting decision-making: whether through the representation of diverse 'socially significant groups' within the broadcasters' governing bodies (as in Germany or Sweden, for example); by giving a regulatory role to a Council of Viewers and Listeners (as in Austria); or by regular efforts to consult the public and to invite comment from social organisations (as in Britain where this has been done by the broadcasters themselves and by special Committees of

Inquiry). Finally, it should be pointed out that from its earliest days public-service broadcasting has played an important role as an agent of national and societal integration and stabilisation. During the dangerous 1930s, under the Director Generalship of John Reith, later Lord Reith, the BBC pursued a deliberate paternalistic mission to maintain public confidence in the values of the liberal British Establishment (of which, under Reith, the BBC itself became very much a part). In the words of Tom Burns (1977, p.41), the BBC could be seen as 'a kind of domestic diplomatic service, representing the British or what he [Reith] saw as the best of British to the British'. President de Gaulle – who had once used the BBC to rally the war-time French – later used the state controlled broadcast media in France as a political instrument to spread support for the French Fifth Republic and to unify the country during a particularly turbulent period in its post-war history. His successor Georges Pompidou referred famously to the state broadcasters as the 'Voice of France'.

Bearing all these broad features and goals in mind, we can now turn our attention to an empirical examination of European broadcasting systems. As suggested already, there is considerable scope for national variation within the paradigm of public-service broadcasting. We will begin by looking at these systems' various structures of ownership and finance and the ways they achieved non-commercialism. Then we will examine some distinctive attempts to cater to diversity and fulfil the cultural vocation. Different kinds of institutional safeguards for pluralism will be explored. Finally, we will consider the important matter of their relationship with the political realm. In each respect, the focus will be on special cases. In other words, particular models will be examined wherever they depart from, or wherever they reflect in a particularly distinct manner, any of these general features.

Ownership and finance

With respect to ownership and finance, Western Europe has displayed a diversity of structures. Brants and Stune (1992, pp. 102–103) have usefully distinguished between what they refer to as: 'pure' public monopolies funded solely by the licence fee; 'mixed revenue' public monopolies drawing on licence fees and advertising; and 'dual' systems where a public sector coexists with a private com-

mercial one. These were certainly the main structural alternatives for the public service model. Yet, within these parameters there existed some interesting variation. For instance, Sweden's 'pure' public monopoly was quite singular. In every other respect a thoroughly 'public' broadcaster, the Swedish Broadcasting Corporation was actually a joint-stock company, its shares divided between interests from the press (20 per cent), other business (20 per cent) and popular movements/voluntary groups (60 per cent). This mix of private commercial interest and social group ownership was very distinctive indeed (Hultén, 1984, p. 38; Gustafsson, 1992, p. 208). Among the 'mixed revenue' systems, Spain's model was unusual in that the public broadcasters were financed almost entirely by a mixture of advertising and direct state subsidy rather than by the usual licence fee. In fact, Spain was the only case of direct state subsidy (although this was reduced to next to nothing over the course of the 1980s). The Finnish 'dual system', too, was different to the familiar British understanding of this version of the public-service model. The monopoly of the Finnish Broadcasting Company (YLE) was relaxed in 1959, when a private commercial station (MTV) was allowed to operate alongside it. However, the private television service was delivered via air-time it still had to buy from YLE, the public broadcasting corporation (Tapper, 1992, p. 51; Lorimer, 1994, p. 82). The Italian 'dual system' was very different yet again. It is very important to note that Italy's model did not constitute a public-service duopoly like Britain's. Rather, the commercial pillar was very largely unregulated. It came about because of a sudden proliferation in the 1970s of local television stations exploiting a loophole in national regulations. Very much against the spirit of the law, these local stations then became organised into a number of national commercial networks. During the course of the 1980s the three main networks were then allowed to fall into the hands of a single entrepreneur, Silvio Berlusconi. Italy's system, therefore, was characterised by a regulated public sector and a largely unregulated private sector. Finally, yet another distinction deserves mention, which bears crucially on the question of 'closeness to the political realm' to be explored later. Although most broadcasting companies were publicly owned, there were very important differences between those that were unambiguously state organisations like the French broadcasters, those that were independent public corporations like the British BBC and the German ARD member stations and ZDF, and those in

which social groups played a key role as in Sweden (see above) and especially as in the Netherlands (as we shall see soon).

There existed, of course, yet another alternative: that of exclusively private commercial broadcasting (see Table 4.2). As suggested, Luxembourg stood out conspicuously among Western European countries because it never developed a public-service model of broadcasting. A tiny country, with hardly more than a third of a million citizens, Luxembourg was strategically situated right at the heart of Western Europe. The 'reach' of its broadcasters extended, very widely for radio and not insignificantly for terrestrial television, into neighbouring countries. Luxembourg's policy makers very soon perceived the advantage of granting a concession to a private sector monopoly, the CLT (*Compagnie luxembourgeoise de télédiffusion*) so that it might 'collect advertising revenue from [these] neighbouring countries', as it has been bluntly put (Lange and Renaud, 1989, p. 30). Although the CLT remained subject to considerable state influence, particularly with regard to keeping it under national control (it was part-owned by Belgian and French interests), its public-service obligations were few and only 'loosely worded' (Hirsch, 1992, p. 147). The 'Luxembourg gambit' was also played by commercial interests using two tiny principalities on the borders of France – namely, Andorra (in the Pyrenees, population 5,000) and Monaco (near Nice, population 20,000) – as bases from which to provide francophone radio services from beyond French regulatory jurisdiction. As a result of competition from these so-called 'peripheral' radio stations as well as from Radio Luxembourg, the three official French state radio networks were never able to enjoy much more than half of the national listening audience. (In actual fact, the so-called 'peripheral' radio stations fell largely under the control of a French state holding company called Sofrad). As we shall see, this model of commercial media 'havens' using their strategic geographical position to provide commercial radio access to wider European markets, was destined to become far more significant in the age of transfrontier television broadcasts by cable and satellite (see Chapters 5 and 6).

Why some systems embraced advertising

Mixed revenue systems, some might be inclined to argue, are by definition not as 'non-commercial' as pure public-service systems

Table 4.2 Types of broadcasting system, 1980

Pure public	Belgium, Denmark, Norway, and Sweden
Mixed revenue	Austria, France, Germany, Greece, Ireland, Netherlands, Portugal, Spain, and Switzerland
Dual system	UK (private sector established in 1954); Finland (in 1959); and Italy (from 1976 onwards – see next chapter)
Pure commercial	Luxembourg, Monaco, Andorra

Source: Adapted from Kees Brants and Karen Siune, 'Public Broadcasting in a State of Flux', in K. Siune and W. Truetschler (eds), *Dynamics of Media Politics: Broadcast and Electronic Media in Western Europe*, London: Sage, 1992, p. 104.

financed exclusively by public funding (i.e. via the licence fee). Thus, Sepstrup (1989) has distinguished between 'commercial public-service broadcasters' which ran adverts, and 'non-commercial public-service broadcasters', which did not. Neither of these, though, were profit-motivated and therefore Sepstrup stresses that they could still be easily distinguished from 'private commercial broadcasters' which drew profits from operating advertising-based or pay-TV services. The crucial point is that both kinds of public-service broadcaster faced no competition for the same sources of finance. Whether those public-service channels that depend to some extent on advertising revenue are more vulnerable to commercialisation when suddenly confronted with competition for this revenue is an interesting question that will be explored in Chapter 7. This was not the case during the period of public-service monopoly.

The 1950s and 1960s were a period of broadcasting expansion with first the arrival of television, then of colour television. As more and more people bought television sets, then colour sets, income from the licence fee increased measurably and steadily. However, this era of rapid growth ended just as that of inflation arrived in the 1970s. Also, broadcasting costs tended to outstrip the general rate of inflation. Therefore, governments were faced with a difficult choice. They could simply raise the licence fee on an 'inflation plus' basis. The problem was that the licence fee was widely perceived as a tax. Few citizens appreciated that it actually represented a very small price to pay for the range of service provided (compare with current rates for subscription television whose very attraction much depends

on rights to programmes previously carried by the public broadcaster(s). Ever wary of incurring popular displeasure, governments sometimes failed to raise the licence fee even enough to cover the ordinary rate of inflation. (In Britain there occurred a discussion about replacing the licence fee altogether). Through the 1970s into the 1980s, across Europe the real income from the licence fee was allowed to decline or at least to stagnate (Lange and Renaud, 1989, p.150 and p. 154; Blumler, 1992, p. 16; Booz, Allen and Hamilton, 1988, p. 6).

Advertising represented a particularly attractive supplementary source of income for the public broadcasters since it was an 'invisible' burden on the viewer. As a consumer the viewer still carried its costs, though unwittingly since they were covered by the retail prices of the products advertised. From the viewer's perspective advertising-based broadcasting appeared to be entirely 'free'. It was therefore politically speaking a very attractive policy option to cover the increasing costs of television. Some countries had introduced it during comparatively early days of the medium. Sepstrup (1989, p. 36) cites both the Netherlands and West Germany as cases of 'high quality public service broadcasters' which had long carried strictly regulated advertising. An important reason why they had been able to do so without suffering any appreciable adverse effects on programme quality was because the monopoly status of the public broadcasters precluded commercial competition for advertising funds. Moreover, within the public-service monopoly framework the demand for advertising far exceeded its supply; the broadcasters therefore had the whip hand and did not have to pander to the advertisers' interests in audience maximisation above other programming criteria. Advertising could be said to have had an additional attraction: the less the public broadcasters depended on income from the licence fee, the greater were their resources of independence from political pressure (since the politicians always decided the level of the licence fee). The view gained currency that the funding mechanism for public broadcasting mattered much less than that it should receive adequate resourcing. From the 1960s onwards, under pressure from the advertising lobby, a number of countries chose the path of introducing advertising as a supplementary source of funding for public-service broadcasting. By the mid-1980s, advertising revenue accounted for a significant percentage of the total income of many European broadcasters (see Table 4.3 below).

This broadcast advertising was commonly subject to strict control

Table 4.3 Advertising as a share of total income of European public broadcasters 1985/86

Country/broadcaster	%
Austria (ORF)	36.7
Finland (YLE)	23.0
France (A2)	62.0
(FR3)	18.0
Germany (ARD)	12.4
(ZDF)	37.0
Greece (ERT1)	21.2
(ERT2)	80.8
Italy (RAI)	32.7
Ireland (RTE)	33.0
Netherlands (NOS)	35.1
Portugal (RTP)	43.9
Spain (RTVE)	97.6
Switzerland (SSR)	26.2
UK (ITV)	97.0

Note:

Belgium's broadcasters were drawing negligible amounts by now too. Also note that France's TF1, privatised in 1986, became wholly dependent on advertising and cannot be here included as a public broadcaster — see next chapter.

Source: European Institute for the Media, *Europe 2000: What Kind of Television?*, Report of the European Television Task Force, Media Monograph No. 11. Manchester: EIM, 1988, p. 49.

regarding content and standards. There were other strictures too. Most of Europe's public-service corporations did not broadcast sponsored programmes. In Austria, where they did, the promoter was prevented from exercising American-style control over the programme (Sandford, 1976, p. 149). Most European countries set the amount of advertising air-time far below what was allowed in the United States (Luxembourg's and Italy's private channels were the exceptions to this rule). Moreover, some countries had very strict ideas about when and how television advertising should be scheduled. Thus, Germany's public broadcasters were limited to running only twenty minutes per day (averaged through the year) and they were banned from advertising on Sundays and national holidays.

Also, advertising was restricted to pre-announced blocks early in the evening; adverts could not break programmes. Similar rules applied in Austria: a maximum of twenty minutes of advertising per day, confined to early evening blocks, not to be broadcast on national or religious holidays. Switzerland, too, specified a daily limit of twenty minutes in four blocks. Almost as strict was the Netherlands with its advertising ceiling of thirty minutes per day, Sundays excluded. Dutch adverts were concentrated in blocks before and after the news. This approach contrasted with Britain's more relaxed regime where 'spot advertising' could interrupt programmes, albeit in 'natural breaks', every day of the year. ITV was allowed to run an average of seven minutes per hour and slightly more in peak periods. It is worthy of special note that Germany and Britain came to loggerheads within the Council of Europe and the European Community during the 1980s over the issue of 'block advertising' and the principle of non-interruption of programmes (see Chapter 8, pp. 274-275).

Britain's duopoly model

The British duopoly deserves special mention not least because with the passage of time it earned considerable acclaim and in so doing it helped to overcome considerable West European prejudice against privately owned television. During the 1980s its high quality was held up by European proponents of commercialisation to strengthen their case for deregulating broadcasting (see next chapter). In fact, this line of argument was specious. The British model showed that private ownership could be reconciled with public-service broadcasting by regulatory means. It is true that ITV actually came into being because a very successful commercial pressure group campaign prevailed upon a Conservative government to abridge the BBC's broadcasting monopoly (Wilson, 1961). However, in marked contrast to the Luxembourg model, the British commercial sector (ITV since 1955 and ILR since 1973) was subjected to statutory obligations and close hands-on regulation by the Independent Broadcasting Authority (IBA).^{*} Indeed, the IBA drew its guiding principles from the very same public-service ethos and tradition that the BBC had developed

during its period of monopoly. The IBA presided over a 'federal system' of fifteen commercial independent television (ITV) companies serving fourteen regional areas (London had two companies, one broadcasting at the week-end, the other during weekdays) and since 1973 a much greater number of commercial independent local radio (ILR) stations. The IBA allocated their franchises. In performing this task, it was not simply concerned with commercial considerations. It selected franchise-holders according to strict criteria of programme standards and schedules, and the 'public interest'. The process itself involved prior public consultation, although the IBA conducted its actual business of decision-making behind closed doors in what critics have described as an atmosphere of impenetrable secretiveness (for an account see Briggs and Spicer, 1986). The IBA also had authority to withdraw or fail to renew the broadcasters' franchises. This latter power was exercised on occasion (notably in 1967) and it therefore exerted a powerful discipline over the ITV companies. Their programming policies had continuously to take account, not simply of commercial criteria, but also of the need to retain their franchises in the next franchise round. The IBA also had considerable interventionist powers: it co-determined and had the last say about programme scheduling; it could prohibit the transmission of programmes it did not like, and it regulated advertising (content, quality, amount, etc.).

In order to provide further protection for the public-service nature of the duopoly, the financial bases of the ITV/ILR and BBC were kept strictly separate. The BBC continued to be funded from the licence fee while the commercial ITV companies financed their operations and made their profits from limited spot-advertising, which was carefully regulated by the IBA to conform to strict codes of conduct. Although there certainly was competition for audiences (the ratings battle), the deliberate avoidance of structures of direct competition for the same source of revenue between the BBC and the ITV sector, limited the incentives for broadcasters to subordinate standards of public service to commercial demands. The same principle was also operative, albeit in a different guise, within the ITV sector itself. Direct commercial competition between the ITV companies, and the corresponding negative effect that this would have had on programming standards, was precluded by the fact that each ITV company held a franchise giving it a regional monopoly (until the 1980s there was no competition from cable or satellite). When

^{*} At first this was called the Independent Television Authority (ITA); the IBA has been now replaced by the lighter touch Independent Television Commission (ITC).

the system was expanded by the addition of the 'minorities channel' Channel 4 in 1982, care was taken to prevent this development from entailing commercial competition. To this end, ownership of Channel 4 was conferred wholly upon the IBA. Moreover, Channel 4 was financed not by competitive advertising but instead by an annual subscription set by the IBA and paid by the ITV companies, who sold the advertising for the channel. Moreover, the ITV companies also sold their own advertising on Channel 4 and retained the profits therefrom. As a result of these carefully crafted structures, the duopoly functioned in a uniquely symbiotic fashion; its various channels competed to produce quality programmes as well as simply for audiences. As much as was possible in any system, standards were protected from open market competition; the duopoly was most decidedly not a 'free' market. The British case demonstrated how public-service regulation and in particular protection from commercial competition – the absence of competition for the same source of revenue – were more important than public monopoly ownership of the broadcasting services.

Organisational and regulatory arrangements providing for pluralism, diversity and accountability

As mentioned, it was also a fundamental axiom that public-service broadcasting systems should provide a universal service catering to democratic pluralism and social diversity. This aim was written into their 'generalised mandates' (see above) and practised within their programme schedules by all public service channels; the Germans called this 'internal pluralism'. From the 1960s onwards, with the expansion of television, quite often a special remit was given to particular channels as well. Thus in Britain, for instance, the more high-brow BBC 2 was introduced in 1964 so that BBC 1 could become more popularly orientated and compete with ITV. Nearly twenty years later, in 1982, Channel 4 was established with the remit to cater specifically to a wide range of different cultural tastes and to serve social minority interests as well as to run quality entertainment programmes (its minority orientation went rather further than BBC2's). In Germany, the function of providing both highbrow and other kinds of minority programming was given to the so-called 'Third Channels', set up during the 1960s and operated by the country's

regional broadcasting corporations (individually or jointly). Public-service radio stations tended to specialise more than television. The public broadcasters offered distinct classical music and pop, light entertainment and serious channels (e.g. devoted to current affairs). Increasingly in the 1970s and 1980s, minority and local services were introduced as well; for instance, in corporatist Sweden the public broadcasters' monopoly was relaxed when voluntary organisations were allowed to operate non-commercial neighbourhood radio. In general, the 1960s and 1970s were decades of great change in the context of West European broadcasting – all within the context of enduring monopoly (or duopoly) structures. The latter's broadcast services were now characterised by greater liberalism and permissiveness, and less deference to tradition and authority (clearly the degree of freedom varied according to the system – see later). The introduction of minority channels and greater concern to schedule for minorities helped to meet a growing demand – from the libertarian Left, from special interests, and from a whole range of single issue movements – for increased minority representation and for more 'media democracy'. (In the 1980s, however, this libertarian theme was hijacked by a libertarian Right arguing that media pluralism would be best served by abolishing public-service monopolies in favour of the 'free market' – see next chapter).

A commitment to provide equal services to all parts of the country governed the expansion of both television and radio. Indeed, catering to regional diversity was considered to be a vital ingredient of the public-service model. Both BBC and ITV were required to provide regional services; respect for regional diversity had been one of the principal rationales for ITV's decentralised construction from the outset in the 1950s (franchises for fourteen regional areas). Both the BBC and the IBA had broadcasting councils for Scotland, Wales and Northern Ireland; the BBC had set up ten regional councils as well. In France, regional diversity was the business of the third channel, *France Régions 3*, launched in 1972. This policy was not restricted to the larger, highly populous countries. Norway was very fragmented, cleaved by strong centre-periphery tensions as well as by many diverse dialects. To respond to these demands, NRK started transmitting regional broadcasts in the 1950s, devoting considerable resources to this end from the 1970s onwards. A number of other countries – notably Switzerland and Belgium – decentralised broadcasting to cater to linguistic and cultural fragmentation (see below).

Partly because of its history, Germany's commitment to decentralised public broadcasting was special. During the post-war occupation public broadcasting was deliberately (re)constituted upon an entirely regional basis. This reflected the concern of the Allied occupiers to protect broadcasting structures against any future recurrence of despotic central control. The decentralisation of broadcasting was also congruent with the federal construction of the Federal Republic (this too, of course, was a hedge against any return of centralised dictatorship). To this end, the 1949 constitution (actually called the 'Basic Law') consigned jurisdiction of cultural policy, which included broadcasting apart from its telecommunications aspects, to the republic's constituent regions or 'states' (the *Länder*). Over the period 1948 to 1956, these *Länder* enacted their own broadcasting laws (individually or in some cases jointly) providing for nine regionally decentralised public-service broadcasting corporations (unification in 1990 added two more). Legally autonomous corporations governed under public law, they were supposed to be independent from the state. Joining together in the Association of Public Broadcasting Corporations in Germany (the ARD) they operated a joint television network, the so-called 'first channel' (DF1), consisting of programmes they each provided according to their size and resources (both of which varied considerably). In the 1960s, a second channel, the ZDF (literally, the 'second German television' service), was set up alongside the ARD network. ZDF was a centralised national channel but it was not under central control. In accordance with the federal nature of broadcasting, ZDF was introduced by an inter-state treaty of all the *Länder* and it remained subject to their shared jurisdiction. As mentioned, the 'third channels' were a regional initiative (for detail, see Humphreys, 1994, pp. 132–169).

Linguistic diversity, too, was reflected in decentralised structures of public-service broadcasting. Thus, in Belgium there were separate radio and television services for each of the country's three linguistic groups, the French speakers, the Flemish (Dutch) speakers and even the small minority of German speakers. Similarly, the Swiss Broadcasting Corporation provided a full service for that country's French, German and Italian linguistic communities. In Spain, during the 1980s, a number of 'third channels' began operating to cater to the Basques, Catalans, and Galicians (as well as other regions). In Britain, a separate fourth television channel for Wales, called S4C, was launched alongside Channel 4 in the 1980s. Also, by the 1980s,

public broadcasters were providing some air-time for ethnic minority and 'guest worker' communities (and the expansion of local community radio and also cable television was making a key contribution as well).

As already suggested, the need to respect the principles of pluralism and diversity was also reflected in the public broadcasters' regulatory structures and accountability mechanisms. In this matter, however, practice varied considerably across Europe. In Britain, the regulators could hardly be described as being socially representative. They were officially chosen, in an opaque manner, from the ranks of a social elite (they were often referred to as the 'Great and the Good'). These Establishment figures were served by advisory councils that were more socially representative, but authority clearly lay with the social elite. In liberal Britain, the regulators were at least independent of government in contrast to statist France (see later). Somewhat greater social representativeness and accountability were evident in Europe's corporatist countries. In these cases, unsurprisingly, certain organised interests gained an important say within the broadcasters' regulatory bodies. In Austria, for example, there existed a quasi-official Council of Viewers and Listeners. This body did not merely have an advisory or lobbying role like Britain's similarly named pressure group. It was actually accorded representation within the regulatory body – called the Board of Trustees – which supervised the Austrian public broadcasting corporation (the ORF). Moreover, in typical corporatist fashion, so too were the ORF's employees. In Austria, direct political appointees outnumbered these organised interests within the Board of Trustees, but the latter were appointed according to the *Proportz* principle – that is in proportion to the party balance both in the government coalition and in the parliament. This effectively gave authority in broadcasting regulation to a restricted party 'cartel' of Social Democrats and Christian Democrats. Nevertheless, as we shall see, this politicisation was fairly commonplace in Europe. Choosing the regulators in a way that reflected genuine social pluralism was far less so.

The German system resembled the corporatist Austrian case but ensured rather wider social representation and more open democratic accountability; the regulatory bodies were supposed to be politically independent. (Again, the German model of regulatory body was explicable by the country's history and the concern to learn from it). All of (West) Germany's broadcasting corporations

were governed by independent broadcasting councils (*Rundfunkräte*)* These broadcasting councils were supposed to reflect what were referred to as the 'socially significant groups'. According to the various *Land* broadcasting laws, these bodies were largely composed of delegates nominated directly by the social groups concerned. This system gave representation to diverse social groups like the parties, business and labour organisations, churches, universities, teachers, women, and so on. Representation was also given to figures from the fields of journalism, culture, the arts and science (see Humphreys, 1994, p. 143). Formally much more democratic than the British model, the regulators still proved to be much closer to the realm of party politics than was true in the elitist British case (see later).

Yet another interesting kind of institutional arrangement – to safeguard media pluralism – was Italy's adoption of 'Garantor' responsible for ensuring that media interests comply with the law and fulfil their special duties. Italy's adoption of this particular institution could be explained, in large measure, by the country's history of slack enforcement of media control and by the seemingly chronic failure of the parties ever to reach consensus themselves on media issues. A parliamentary commission that was supposedly responsible for supervising the broadcasters had amounted to little more than 'the parties' agency for political control' and had been 'rarely distinguished for its interventions in overt defence of viewers' rights and interests' (Mazzoleni, 1994, p. 129). Therefore a Broadcasting Act of 1990 extended to the 'Garantor' ultimate authority over broadcasting regulation (this was ten years after the same provision had been applied to the press sector). A single individual, typically a magistrate, appointed by the chairmen of both houses of the Italian parliament, the Garantor was a 'monocratic authority' with a wide range of regulatory duties. These included keeping ownership structures under review and making sure that the broadcasters respected the interests of the viewers as outlined in the Broadcasting Act. Attached to the Garantor's office was a Viewers' Advisory Council staffed by members of the various viewers' associations and media experts.

* With national re-unification in 1990, West Germany effectively took over East Germany and its media system was reconstructed on West German lines – Humphreys, 1994, Chapter 7.

Despite this innovation, Mazzoleni (1994, p. 133), suggests that 'political rather than social accountability of the media seem[ed] more characteristic of the Italian case'.

Pluralism, elitism and broadcasting policy styles

Unsurprisingly, broadcasting policy reflected distinctive national policy styles and traditions. Italy's broadcasting policy style could best be described as 'immobilist', like the country's political system itself. In most Northern European countries policy-making was corporatist, consensual and incremental. In France it tended to be more majoritarian and prone to radical leaps. French policy-making could be termed *dirigiste*. In Germany it was highly legalistic. Britain's traditional broadcasting policy style, too, was distinctive.

In keeping with the British administrative tradition, important decisions about broadcasting were customarily made only after an 'institutionalised consensus' had been reached through widespread consultation of the relevant interests (Humphreys, 1991, p. 205). An important mechanism for achieving this consensus was the independent committee of inquiry. These were headed by an Establishment figure, but composed carefully along pluralistic and meritocratic lines. At regular intervals of about twelve years during the post-war period, British governments enjoined these ad hoc committee to seek ways of accommodating public broadcasting to changing social needs. These committees then invited submissions from interested individuals and groups, held public hearings, and on the basis of evidence and opinion gathered in this way, produced reports that were both weighty and highly influential, giving direction to subsequent reform. Thus, the Beveridge Report (1949) criticised the BBC's old fashioned paternalism and a minority report opened the way for the introduction of ITV. The Beveridge report also mooted the idea of decentralising broadcasting, an idea that was implemented both by the BBC and in the shape of the ITV system. The Pilkington Report (1962) was highly critical of the early experience of ITV and helped to ensure that the new commercial sector soon conformed to the public service model. Its recommendation that the powers of the IBA (then called the ITA) be increased, were accepted. (If anything the Pilkington report was too critical of ITV – see Seaton in Curran and Seaton, 1991, Chapter 12). Later, the Annan Report (1977), pointed

to the need for more diversity, greater expression of minority concerns, and new ideas and experimentation. This prepared the ground for the introduction of Channel 4. (However, the Annan report rejected the view that the broadcasters' regulatory bodies should be made more socially representative.) Between these special commissions of inquiry, parliamentary committees – such as the Select Committee on the Department of National Heritage – provided another channel of accountability. Elite commissions and special committees concerned with broadcasting policy were not a uniquely British phenomenon. They played a key role at times in other countries too, particularly when the 'new media' of multi-channel cable and satellite television began to be seen as a matter of great public policy import in the 1980s (see next chapter). Nevertheless, the regularity and the authority of these major British inquiries – and not least their reports' character as classic documents of public service broadcasting principles and debates – marked them out for distinction. The reports were the product of a liberal elite that viewed broadcasting's public-service nature as a very serious business indeed; yet they were practically informed by the wider policy community. This balance helped to explain the capacity which British broadcasting policy makers displayed for pragmatic and adaptive, yet sometimes inspired innovative change (the duopoly's careful structures, Channel 4, etc.).

Statist France provided a great contrast. As Minc (1993) has described, crucial policy decisions were all too often taken upon executive whim without an effort to canvass public opinion and without allowing policy to be guided by the broadcasting community. All too often, the only voices that the executive seemed to listen to, were the technocrats and engineers. As a result, policy tended to reflect a narrow mix of political and technocratic criteria; it also tended to be highly voluntaristic. A classic example of this policy style was the manner in which de Gaulle decided that France should pursue its own SECAM colour television standard in the 1960s despite the fact that the German PAL standard became the West European norm. This decision burdened French industry with comparatively high costs, which translated into high prices for broadcast equipment, which adversely affected consumers, resulting in a slower diffusion of the equipment. Through isolating France, though, the standard consolidated the state's control of broadcasting. Again, in the 1980s, this *dirigiste* approach led to the adoption of a number of statist and technocratic projects – for the development of cable and

satellite television – which similarly proved to be over-ambitious technically (cable) or largely superfluous to market demand (satellite). However, not all voluntaristic broadcasting policies were disappointments. A pay-TV channel called Canal Plus, launched in the mid-1980s, went on to become a market leader in Europe. The fact remains that French broadcasting policy was a rather closed technocratic business, beyond which it was dictated more by the comings and goings of governments than by anything else. Between 1959 and 1986 French broadcasting underwent no fewer than five organisational reforms, three of which were major ones as will be seen. As Sorbets and Palmer suggest (1986, p. 90) 'it [was] symptomatic that any new regime ... result[ed] in a more or less thorough reform of audiovisual law and regulations'.

In Germany, by contrast yet again, the main parameters of broadcasting policy were ultimately decided by – and pluralism underpinned by – constitutional-legal means. In Germany constitutional law played a very special role in broadcasting policy. There were several reasons for this particular characteristic feature of the post-war German system. In the first place, Germany had an old *Rechtsstaat* tradition.* This tradition could be traced back to the nineteenth century. In the second place, the Nazi dictatorship had showed how necessary were constitutional underpinnings of democratic pluralism in the media field. During the post-war period, therefore, no lesser body than the Federal Constitutional Court quickly established the objective parameters of broadcasting policy-making. Policy in Germany was guided by what has been described as 'broadcasting constitutionalism' (Humphreys, 1991 and 1994). The court, which like the US Supreme Court was the highest authority in the land, was first called upon to defend the cultural sovereignty of the *Länder* in 1961. This intervention was prompted by a blatant attempt by the federal Chancellor Konrad Adenauer to launch a second channel which, though commercial, was clearly intended to be controlled by the federal government (i.e. Adenauer). The Court's famous 1961 ruling served as a kind of 'Magna Carta' for the public-service system, confirming unequivocally the independent cultural jurisdiction of the *Länder* and therefore their responsibility for regulating broadcasting services. It also seemed to entrench the public monopoly, pointing

* The translation of this as 'a state within which law plays a very special role' conveys the sense rather better than the commonly encountered 'state ruled by law'.

explicitly to the distinction between broadcasting and the press. While the press provided pluralism and diversity through the market, broadcasting was restricted to a limited number of services by factors of a technical (scarcity of frequencies) and economic nature (the high costs of becoming involved in broadcasting operations). This, it was argued, provided the rationale for the public monopoly. Later, in the 1980s, it was the Constitutional Court that opened the way up for the introduction of private commercial broadcasting (the 'scarcity of frequencies' having meanwhile been overcome by technical change). At the same time, however, it stipulated that the very precondition for this should be the safeguarding of the basic public-service role of broadcasting. The Constitutional Court's deliberations always tended to range well beyond the narrow legal issue in dispute, to consider the broad questions of broadcasting as a social institution. In this regard, the court – a legal 'Establishment' – could be said to have played a quite similar role to the British commissions of inquiry just mentioned. Within the parameters decided by the court, the *Länder* enacted their own broadcasting legislation. Whenever national regulations were called for (eg. for satellite broadcasting), they had to come to collective agreements in the form of inter-state (inter-*Land*) treaties. This was another key feature of the German broadcasting policy process that made for consensual, or at least incremental and bargained, rather than majoritarian, policies.

To a point, the German policy style also shared a marked feature of Northern Europe's small states: namely, corporatism. In the Scandinavian countries, Austria and Switzerland, it was most uncommon for major media policy decisions to be taken without a determined attempt to arrive at a consensus between the relevant organised interests (in Sweden, Austria and Switzerland, this included the press). As will shortly be seen, in the Netherlands and Belgium, a very high premium indeed was placed on consensus. In all these countries, executive voluntarism was definitely not the norm. The networks, commissions, working groups and so forth, where policy was formulated, typically involved all the relevant 'social partners'. The media policy community would play an important role in influencing legislation. However, it is noteworthy that this corporatistic policy style has been eroded in the 1980s. In broadcasting policy-making, certainly, the new tendency has been towards direct – and successful – lobbying of government by powerful commercial interests (Trappel, 1991; Meier and Trappel, 1992).

Structures of broadcasting in culturally 'plural' societies: the Dutch and Belgian cases

Nowhere, perhaps, was *congruence* between the characteristics of the political system and those of the media system more striking than in the case of those culturally plural societies with 'consensual' political systems (Lijphart, 1984 – the term 'consociational' has also been used, but this concept proved to be controversial among political scientists). In different ways the Netherlands and Belgium illustrate this point neatly. In both cases, the structures of broadcasting, like the macro-political structures in which they were embedded, were designed specifically to cater to the countries' social and political heterogeneity. In such societies, majoritarian decision-making styles and institutional structures were wholly unsuitable. Instead, national integration was best served by mechanisms making for elite accommodation and consensus. Among these mechanisms were the principle of proportionality in electoral systems, appointments in the bureaucracy, distribution of resources, and so forth; and the granting of a crucial degree of autonomy for the different subcultures. These key features – proportionality and subcultural autonomy – were the main characteristics of the structures of broadcasting. As we shall now see, the Dutch case provided for years an excellent example of catering to marked social 'pluriformity' (McQuail, 1992a, p. 100) through a non-territorial kind of 'sociological federalism' (Lijphart, 1984, p. 185). In Belgium's case, the linguistic cleavage was catered for by a federalism that was mainly, but not entirely, territorial in view of the fact that the Brussels region of the country was a mixed community and also the fact the German-speakers were catered for by broadcasting structures even though they did not gain a political regional entity of their own. Usefully, Lijphart suggested that for the decentralisation of cultural affairs in Belgium – which includes broadcasting – the term 'corporate' federalism was more apt than territorial federalism (Lijphart, 1984, p. 184).

The Netherlands

The Netherlands was the largest of the small West European countries in terms of population size, with around fifteen million inhabitants. For much of the twentieth century, Dutch politics and society presented an image of 'segmented pluralism' or socio-political 'pil-

larisation' (*Verzuiling* in Dutch). From their earliest mobilisation in the last century, Dutch social movements, voluntary associations and political parties were all organised within the distinctive encapsulated 'pillars' that were formed by the religious and ideological cleavages that vertically segmented Dutch society and politics. Two religious groups – Calvinists and Catholics – had a cross-class appeal within their two pillars, while the secular 'pillar' was itself divided by class cleavage. With the extension of the mass suffrage, this pattern resulted in a multi-party system. No less than three religious parties (until they united in the Christian Democratic Appeal in 1974) faced on the Right a conservative Liberal party (the VVD), and on the Left a Socialist labour party (PvdA). Despite 'de-pillarisation' since the 1960s, there has still never been a majority party. Coalition government was the norm. During much of this century, large areas of Dutch public life reflected this pillarisation, including the public administration, the education system, and the media system. Indeed, hardly had radio broadcasting commenced in the Netherlands than the 'pillars' took over. By the 1930s the radio spectrum had been legally shared out exclusively between corporations closely tied to the different political pillars of Dutch political society: the Catholics, Protestants, Socialists and Liberals (ideologically conservative). In the post-war period, a 1969 Act served to make the rigidly pillarised system more flexible and open. There followed a limited expansion of the range of broadcasting organisations. The Act also allowed a number of smaller bodies to receive small amounts of air-time (eg. party political broadcasts for small parties, 'open access' type broadcasts, etc.).

The 1969 Act also established a new public service body, the Dutch Broadcasting Corporation (*Nederlandse Omroep Stichting*, NOS), to administer, regulate and coordinate these various broadcasters. The high premium placed on reaching consensus was faithfully reflected in the composition of the supervisory board of the NOS which was generally representative of the range of broadcasting organisations. NOS took over the provision of technical services and provided a balance of general consumption programme fare (eg. news, current affairs, sports, etc.) amounting to some 20 per cent of total air-time. Perhaps rather bizarrely to an outsider, the remainder of the air-time available, on three national television channels, was meticulously allocated on a ratio of 5:3:1, calculated according to the size of relevant social group membership (membership being con-

ferred either through payment of a simple fee or by subscription to the broadcasting magazines that the groups each produced). Air time on *Nederland 1* was largely reserved to VARA (socialist), KRO (Catholic) and NCRV (Protestant), these all being deemed 'class A' broadcasters. The majority of air-time on *Nederland 2* went to three more 'class A' broadcasters: AVRO (conservative), TROS and VOO (ideologically neutral, popular, entertainment-orientated). There were two 'class B' broadcasters: VPRO (liberal-progressive) and EO (evangelical). No groups fell into the 'class C' category (see Tables 4.4 and 4.5).

Table 4.4 Air time allocation in the Netherlands public broadcasting system, 1991

Broadcaster	Group membership threshold	Television (hours p.w.)	Radio (hours p.w.)
'A'	450,000	12	65
'B'	300,000	7	39
'C'	150,000	n/a	n/a

Source: Calculated from data in Kees Brants and Denis McQuail, 'The Netherlands', in Bert Østergaard (ed.), *The Media in Western Europe: The Euromedia Handbook*, London/Newbury Park/New Delhi: Sage, 1992, pp. 152–166, pp. 158–159.

Table 4.5 Broadcasting associations in the Netherlands

Broadcaster	Established	Political identity	Status
AVRO	1928	Liberal/conservative*	A
EO	1967	Evangelical	B
KRO	1925	Catholic	A
NCRV	1924	Protestant	A
TROS	1964	Neutral	A
VARA	1925	Socialist	A
VOO	1973	Neutral	A
VPRO	1926	Liberal/progressive	B

Note:

* Nominally neutral.

Source: Kees Brants and Denis McQuail, 'The Netherlands' in Bert Østergaard (ed.), *The Media in Western Europe: The Euromedia Handbook*, London/Newbury Park/New Delhi: Sage, 1992.

Though they were free to provide ideologically biased programming, all these 'corporations' were strictly speaking required by law to offer a balanced mix of information (25 per cent), culture (20 per cent), amusement (25 per cent) and education (5 per cent). *Nederland 3* was used for NOS's news, sports and cultural programmes, and to grant air-time to numerous smaller organisations (Brants and McQuail, 1992, pp. 158–159).

So we can see very clearly indeed, in the Dutch case, an example of more or less exact congruence of structures of the political and the media system. This congruence reflected the traditional 'pillarisation' of Dutch society into distinct political cultural communities and the consequent attempt to achieve a consensual political balance within the structures of broadcasting. Clearly, the shaping of these structures along the lines of social and political community meant that they were politicised. Historically, as Brants and Jankowski (1985, p. 74) have put it, 'the media, as the core propaganda organs of the pillars, constituted core elements in the politics of control'. McQuail (1992a, p. 99–100) has observed that some ideologically biased programming was 'even a positive expectation'. On the other hand, the system did provide for 'external pluralism': in other words, there was choice across the various services (as distinct from 'internal pluralism' within each programme service). Moreover, the Dutch system was not under the government's thumb. 'The various broadcasting organisations, to a certain extent, broadcast what they wished' (Nieuwenhuis, 1992, pp. 204–205).

It should be noted, too, that from the 1960s onwards Dutch society became progressively fluid and decreasingly segmented; it became 'de-pillarised'. Viewers no longer felt tied to any particular broadcaster. Increasing numbers, particularly the young, now preferred instead to 'view around'. The secular loosening of religious and ideological ties led to a corresponding 'de-pillarisation' of the media system, if not in structure at least in consumer behaviour and programme content. A loosening of political/consumer loyalties, and increased competition within the media system for readers and viewers, had the *de facto* effect of secularising and commercialising media patterns, shifting the balance of media fare towards a more de-ideologised entertainment function. This has been referred to as a 'TROs-ification' process, as the traditional broadcasting organisations felt compelled to copy the popular entertainment programming style pioneered by TROS. By the close of the 1980s over half of the

overall programme fare of Dutch public broadcasting was of this kind. For VARA and VOO it was over two-thirds. Moreover, by now the Netherlands found itself in 'turmoil' as a result of competition from commercial channels introduced in neighbouring countries, most notably a Dutch language offspring of Luxembourg's CLT, called RTL 4. This latter development will be explored in the following chapters (Brants and Slaa, 1994, pp. 13–14; McQuail, 1992; Nieuwenhuis, 1992).

Belgium

In Belgium 'pluriformity' translated into federalism along the lines of linguistic community. The country's ten million population divided between Dutch-speaking Flemish (57 per cent), French-speaking Walloons (42 per cent) and a small German-speaking community. Historically there was also a milder version of the Dutch kind of pillarisation. Accordingly, in the earliest days of radio a number of stations were sponsored by ideological organisations reflecting the Catholic, secular Liberal (ie. conservative), Socialist and Flemish nationalist political communities. After World War II, a unified public service monopoly was established. However, in order to counter an intensification of the linguistic cleavage, from the 1960s onwards a series of reforms led eventually to the federalisation of the country. This was mirrored in new broadcasting structures. In 1960 the main language communities were granted their own autonomous broadcasting corporation, each responsible for the functions of transmission, administration and finance: the RTBF for the francophone Walloons and the BRT for the Dutch-speaking Flemish. These broadcasting organisations fell within the jurisdiction of the cultural communities. They were each governed by highly politicised boards that reflected the prevailing 'political arithmetic on the regional level' (Hirsch, 1986, p. 22) and that 'stifled the broadcast system' (de Bens, 1992, p. 19; for a detailed account, see Burgelman, 1989). Much later in 1977 an additional small broadcasting service, the BRFF, was established for the country's German speaking minority.

Closeness to the state and the question of politicisation of the broadcasters

The politicisation of public broadcasting was by no means a feature of these systems alone. Far from it. From the 1950s expansion of mass television onwards, the broadcast media were increasingly perceived to be crucially important for politicians seeking both electoral support and popular legitimacy for their policies. In the interests of balanced pluralism, paid political advertising, as occurred in the United States, was disallowed (Italy's private channels were an exception). Undoubtedly, this reflected the much greater strength of the Left in Europe; it also followed from the European Left's comparatively weaker links to business sponsors. Instead, all of Western Europe's democracies developed rules governing electoral broadcasting. These rules were concerned with ensuring equality or at least 'equitability' of a limited amount of free access before and between elections. In Denmark, Finland, France and the Netherlands, this came to be allocated on an equal basis to all parties. In Britain, there was equality for the two major parties. Elsewhere, it was worked out in relation to party strength, on some kind of a proportional basis. For such broadcasts, the choices about content was left in the hands of the politicians alone. Important as they were, however, such formal rules had little bearing on the most controversial aspect of the relationship between broadcasting and politics: the extent to which politicians were able to exercise control over the broadcasters themselves and thereby continuously to influence the agenda of other political broadcasting, notably news and current affairs.

Western Europe's public-service broadcasters generally enjoyed certain safeguards designed to protect them from being creatures of the state and politicians. In the first place they were normally granted the legal identity of autonomous corporations. Secondly, they were regulated by special boards internal to the organisation (as in the case of the BBC and the German broadcasting councils) or by special bodies external to them (like the IBA) or sometimes by both (the case in Sweden). Thirdly, although the level of the licence fee was determined by government or parliament, broadcasters usually had a degree of autonomy over their finances. However, there were exceptions and weaknesses in all of these respects, as we shall see. In fact, the extent of politicisation of the public-service broadcasters varied very considerably. Different political systems presented varying

opportunities for it to occur and encouraged different manifestations of it. The most obviously dominated broadcasting systems were those closest to the state. Indeed, in marked contrast to consensual and corporatist systems, statist systems presented the political executive, rather than a balance of social forces, with scope for direct media control. As will be described shortly, France's statist public broadcasting 'monolith' provided a good example. Where the broadcasters were at an important remove from the state, by dint of being self-regulating public corporations, like the BBC or the German corporations, the scope for state domination was much less.

However, there remained avenues for political influence. Firstly, politicians could exert pressure through their control over the user licence fee. Rarely was the business of setting the level of this mainstay of the broadcasters' income not directly in the hands of government, though the German Constitutional Court has recommended giving this authority over to a genuinely independent body. Moreover, governments could exert pressure through proposals to introduce advertising or subscription as in Britain under Thatcher (Franklin, 1994, p. 82; Ezrioni-Halevy, 1987, p. 74; Jones, 1991, p. 217). The broadcasters' ultimate dependence on the state for finance, then, was an obvious weak link in the public-service model. Clearly, privately funded broadcasters could be more securely independent in this regard. However, even here governments might retain the right to grant franchises or else to exert such pressure through their influence on the franchising bodies (see next chapter). Secondly, governments determined media policy: this allowed them to change, or threaten to change, the rules of the game to the advantage or disadvantage of the broadcasters. This too could be a potent source of 'blackmail'. Thirdly, as with the 'free press', governments could invoke security requirements to censor the broadcasters. Constraints on the reporting of Northern Ireland by the British broadcasters were a good case in point (Franklin, 1994, pp. 79-81; Jones, 1991, p. 217). Fourthly, as with the press, governments could manage the news by various means (see Chapter 2). They could even use the media to advertise their policies under the guise of public information programmes. In Britain, for example, during the 1980s government advertising leapt from £35 million of expenditure to £200 million (Jones, 1991, p. 206). Finally, responsibility for appointing the regulators usually lay with the politicians. Even where law or convention provided for a pluralistic composition of such bodies, the fact that

regulators were political appointees remained a weak link in the public-service model. Moreover, the politicians might be in a position to 'colonise' the broadcasting corporations by making strategic appointments to their management structures. This kind of politicisation – and its effects – would then percolate downwards in the organisation.

France: a highly politicised 'statist monolith'

In France political control of the broadcast media was the subject of intense controversy throughout the whole of the post-war period. French political culture was part of the explanation. Public broadcasting had always been seen as the official 'voice of France'. France also had a marked 'strong state' or *étatiste* tradition; centralised statism was the constant of French history, providing a bureaucratic antidote to the centrifugal social and political forces that historically had often seemed to threaten the country with instability. Finally, in the modern era, during the generally stable Fifth Republic, the political system usually functioned in a distinctly 'majoritarian' executive-centred fashion; periods of 'cohabitation' apart, the political power centre was the presidency. Whoever won the presidency disposed of extensive powers of patronage including in the field of broadcasting; the president's government held all the levers of power. Even cohabitation (the state of affairs when the president lost his parliamentary support base) merely transferred uncommonly strong executive powers in most policy fields – including broadcasting – to the prime minister and his cabinet. Parliamentary constraint was feeble; the Fifth Republic had one of the weakest legislatures among Western democracies. Quite simply, all this 'afforded opportunities for political propaganda which [were] consistently ... used and often abused by successive governments' (Vaughan, 1985, p. 20). As Kuhn (1985a, p. 47) puts it 'the two most salient features of broadcasting in France ... [were] first its legal status as a state monopoly and, secondly, its use for partisan political purposes by the government of the day'.

The Liberation government not only tightened up the state's formal monopoly of broadcasting, it transformed the broadcasters into state servants, thereby placing them under effective political control. Throughout the Fourth Republic *Radiodiffusion-Télévision*

de France (RTF) remained a highly centralised organisation, its director-general being directly appointed by the government and the state exercising total control of its budget. An organisational reform was introduced with the change of regime to the Fifth Republic as the result of which the RTF gained a degree of nominal financial autonomy. However, the director-general, his deputy and the directors of the various broadcasting services, all remained government appointees. Change occurred again in 1964 when another administrative reorganisation saw the RTF transformed into the *Office de Radiodiffusion-Télévision Française* (ORTF). This reform created a 'pluralistic' board of management (*conseil d'administration*) but this body was allowed very little autonomous authority. As Minc (1993, pp. 15–17) has remarked, a kind of tacit agreement appeared to exist between the political power-holders and the broadcasters whereby the latter accorded to the former omnipotence over information in return for protection of their corporate interests. The broadcasting monopoly guaranteed the state's political control; the broadcasters' compensation was their virtual monopoly of broadcasting production. Information control was exerted through a complex network of official links so that through successive organisational reforms the medium remained under constant political tutelage. Minc even described French broadcasting executives as 'prefects responsible for information and entertainment' (analogous to the state *préfets* that, since Napoleonic times, had been the central state's principal regional agents). Kuhn (1995, p. 5) has employed the same analogy, suggesting that 'centralised state control of television by the Gaullists ... was intended to reinforce the legitimacy of the one and indivisible (Fifth) Republic as the embodiment of the national will, just as the prefectural system of 150 years previously had been used to bind the nation under the control of the Napoleonic Empire'.

With the arrival in power of president de Gaulle – and the establishment and consolidation of the majoritarian Fifth Republic – the state broadcasting monopoly was wielded for political purposes in a very blatant manner indeed. During the 1960s and early 1970s, the ORTF was literally packed with Gaullist appointees. One result, as Kuhn (1985b, p. 53) tells us, was that 'prior to 1965, opposition spokesmen, such as François Mitterrand, were kept off the screen or suffered from malicious editing'. Even after principles of political balance and impartiality were formally enshrined in the ORTF statute in 1964, the Ministry of Information continued to fix the

agenda of radio and television news programmes and even to indulge in direct censorship. It is true that with de Gaulle's demise political control of information became more discreet. Following Giscard d'Estaing's assumption of the presidency in 1974, a new broadcasting law was enacted that confirmed the state monopoly but broke up the ORTF into seven separate, supposedly autonomous, public enterprises: three television channels, TF1, Antenne 2 and the regional service, FR3; the radio service, Radio France; the technical and transmission service, TDF; the production service, SFP; and finally the archival and research institute, INA. The organisational reform did little to reduce the statist grip. The state continued to own and to direct all seven services. The Giscardians claimed that, under them, the broadcasting system was now neutral. Certainly the 'excesses of the Gaullist period were now out of fashion'. Under the presidency of Giscard d'Estaing 'overt ministerial censorship became the exception rather than the rule'. However, 'controls were [now] largely internalised within the television companies' (Kuhn, 1995, pp. 158-159). As Minc (1993, p. 18) has explained, Giscard's presidency merely replaced overt hierarchical dominance with a more diffuse kind of influence, exerted through his powers of patronage. Vaughan (1985, p. 20) noted how 'the list of appointees ... showed a clear shift towards Giscard's retinue'. Similarly Flichy (1984, p. 232) concluded that 'the main change between the 1960s and the 1970s was that the government no longer controlled the release of daily information but instead, chose journalists sympathetic to its political beliefs'.

It is, then, hardly surprising that the Left came to power, following Mitterrand's victory in the presidential election of 1981, with a firm commitment to 'liberate' the broadcast media from a majoritarian spoils system which had patently worked to their disadvantage for over two decades in opposition. One of their first acts was to establish, by a particularly radical broadcasting law of 1982, a High Authority for Audiovisual Communication (*Haute Autorité de l'Audiovisuel* – see next chapter). Formally at least, the government's power to make political appointments in the broadcasting organisations was now removed and given over – for the first time – to an independent IBA-type authority. The body was also charged to ensure the right to reply to governmental statements; to watch over political broadcasting generally; and, more narrowly, to regulate programmes broadcast during election campaigns. Yet the Left too was soon accused of having conducted a customary witch hunt

through the public service broadcasting organisations. Despite the Socialists' reform initiatives, which without any question significantly shifted the organisational framework of French broadcasting away from centralised state monopoly control (see next chapter), there remained distinct traces of surreptitious politicisation about the system. In particular, there were serious controversies surrounding the appointment of director generalships of the public-service television channels. The appointment of Socialist sympathisers to these key jobs seemed to illustrate 'the tenacity of certain longstanding traditions' (Kuhn 1985b, p. 54; Kuhn, 1995; Quatropoint *et al.*, 1987, pp. 13-154).

Britain: a paradigm of broadcasting independence?

Britain's duopoly system has often been held up as a counter-model of comparative independence of the broadcasters; in Britain, government's influence has been of the 'arm's length' kind. Again political traditions can be adduced to explain this state of affairs; in particular, Britain's long-standing liberal, 'weak state' tradition. The corollary of this weak state tradition was Britain's development of strongly entrenched, autonomous institutions of civil society, like the BBC and later the IBA. To the extent that this model character of British broadcasting held true, political traditions must be considered to have been very important. Post-war British broadcasting certainly benefited from an uncommon willingness on the part of government to respect the principle of the broadcasters' independence even if this did not preclude all manner of subtle (and not always so subtle) manoeuvres to exert external pressure on them. All the same, the parties did exercise restraint; there existed a clear 'gentlemen's agreement' between the political parties to desist from any overt politicisation of the media. The British broadcasters' 'relative autonomy' also unquestionably reflected the uncommonly strong institutional authority and independence established over the years by the BBC itself which rubbed off later on the ITV/IBA sector. The most obvious point of contrast with the French case was that the broadcasters were not directly state organisations: the BBC was a public corporation and the ITV companies were privately owned. In neither case were the broadcasters state servants. Further, both parts of the duopoly were governed according to the 'trusteeship' mode of

regulation. Both the BBC's Board of Governors and the IBA (super-vising ITV) were formally autonomous and powerful regulatory bodies, charged with the task of ensuring that the broadcasters respect the principal of political impartiality and fulfil their many other public service obligations. The members of each supreme regulatory body may have been government appointees but they were regarded as trustees of the public interest. They were there to 'shield' the broadcasters from outside pressure and to 'protect' them from from politicians and pressure groups, 'more than the other way round' (Seymour-Ure, 1991, p. 63).

However, as Negrine (1985, p. 17) has suggested, the BBC's Board of Governors and the IBA could be seen either 'as a buffer between the state and the broadcasters or as an indirect mechanism by which the state [could] exert control over broadcasting'. The fact that both bodies were effectively composed of government nominees might lead sceptics to expect the latter. Nevertheless, the fact remains that even the most radical critics of the British model have accepted that (at least until the 1980s) the system was not at all party politicised. Thus, for Stuart Hood (1983, pp. 39–52) the regulators, appointed from the ranks of the Great and the Good, 'represent[ed] the ideas and values shared by some of the most important groups within the British ruling class'. Yet, Hood still acknowledged, the regulators were 'not appointed on a party basis'. Similarly, a respected British academic marxist, Ralph Miliband (1969, p. 200), conceded that the broadcasters 'preserve[d] a fair degree of impartiality between the Conservative, Liberal and Labour parties' though he went on to emphasise how undemocratic the system really was. Echoing Hood, Miliband noted that the trustees of British broadcasting were 'Establishment figures, whether Conservative, Liberal, Labour or "non political"' (p. 209).

Britain's trusteeship model was certainly elitist and socially unrepresentative. Further, the broadcasting independence that it upheld was excessively reliant on political cultural safeguards. There was an absence of the constitutional-legal guarantees that, for instance, the German broadcasters enjoyed (in fact, the legal status of the BBC's independence was quite ambiguous). As everyone knows, political culture can change; 'gentlemen's agreements' can go out of fashion. It has been suggested that the BBC's Board of Governors did become more politicised during the Thatcher era (Milne, 1988, p. 82; Franklin, 1984, pp. 78–79). An interesting academic study by Etzioni-

Halevy (1987) found that, although British broadcasting was not internally 'colonised' by parties or governments, it was far more vulnerable to external political pressures than expected. These pressures, Etzioni-Halevy noted, intensified during the 1980s. The 'casualisation' of working conditions within the corporation actually rendered BBC journalists more vulnerable to pressure than their counterparts in Germany where politicisation was the rule but where more broadcasting journalists also enjoyed job security. A strong argument could be made for democratising Britain's elitist version of 'trusteeship' regulation by increasing the representativeness and accountability of the regulatory bodies and underpinning this in law. Indeed the German variant of trusteeship does suggest itself as a potentially more pluralist model. The problem, as we will now see, was that in practice it was also effectively a party politicised one.

Germany: a more democratic model?

During the Third Reich, the Nazis had used the notorious 'People's radio' as a powerful instrument of propaganda and social control. Therefore, the post-war German elites were above all concerned to uphold principles of fairness and impartiality within the public broadcasting system. When liberal democracy was restored after World War II, under the watchful guardianship of the Western Allies the electronic media system was profoundly reorganised and democratised. The influence of politicians was supposed to be confined to public policy aspects of the media; editorial control was taken out of their hands. The country's post-war political system was far less majoritarian than Britain's or France's (under the Fifth Republic). West German government was decentralised and executive power was dispersed. Key constraints were placed on the central political executive by the federal nature of the political system and by the legalistic political culture. As emphasised already, a vital role in public policy was played by constitutional law.

These features were faithfully reproduced in the organisation and control of the broadcasting system. Each broadcasting service was supervised by an internal broadcasting council. As already described, these councils were composed according to the principle of regulatory power-sharing by the socially significant groups. In most cases, too, these councils chose the service's director-general (called the

Intendant). This system was supposed to ensure diversity, ideological balance, and so forth, within each service (rather than across a number of biased services as in the Dutch case). Germans referred to their system as one of 'internal pluralism' (as opposed to Dutch-style 'external pluralism'). However, despite its model character, the self-consciously pluralistic West German broadcasting system all too soon became wracked by bitter controversies about the extent to which it had become effectively party politicised (rather than state dominated). The main question, in the German case, was whether or not the politicisation worked to benefit one political party more than another. That the system was politicised was a matter of common agreement, among political parties, media researchers, academics and all concerned. Not only were regulatory authorities composed of party members and sympathisers, the politicisation extended to party card carriers being appointed to key jobs within the corporations, even down to middle management, producers and journalists (the links between broadcasting and party politics in Germany is explained by *inter alia*; Williams, 1976; Kleinsteuber, 1982; Etzioni-Halevy, 1987; Porter and Hasselbach, 1991; and Humphreys, 1994).

This party politicisation may seem paradoxical, in view of the aforementioned determination to safeguard the broadcasting corporations from the negative influence of the state. The explanation was in part historical/political cultural. In the immediate post-war context of the Cold War and the lost legitimacy of other elites, the democratic political parties in West Germany soon acquired an over-weening presence in many areas of social life. German political scientists referred to the emergence of a 'party state' (*Parteiensaat*). Like the bureaucracy, the notionally independent broadcasting corporations quickly fell victim to this extensive reach of the democratic parties' influence (Dyson, 1977). The broadcasting system also had an institutional weakness. The regulatory bodies may have been composed more democratically than in the British version of the trusteeship model, with detailed laws carefully apportioning representation pluralistically to the 'socially significant groups'. The problem was that, on the one hand, seats in these bodies were also given to parliamentarians; and on the other hand, these 'socially significant groups' (eg. trade unions, business associations, etc.) usually had clear political allegiances. This notwithstanding, the German case contrasted with the French. Firstly, it is important to note that the 'socially significant groups' were not simply party instruments. Even

if all too often they had close party identifications and links, they remained important agents of genuine public accountability and pluralism. They had their own views, made their own input, and did feel bound to respect the public interest. Secondly, an important measure of democratic pluralism was guaranteed by a factor which was both political, cultural and institutional in nature: namely, the German respect for 'proportionality' (*Proportional*). This principle was also characteristic of a number of other northern European democracies. As seen, it was to be found in the Netherlands, Belgium and in Austria; it contrasted directly with the strongly majoritarian ('winner takes all') model of France. In the latter case, after elections the new government reaped all the 'spoils' of victory, including control of broadcasting. In the West German case, by contrast, *Proportional* accorded a share of political influence within the regional broadcasting corporations to the loser of the relevant *Land* election. All the same, an important measure of political influence was gained in the regional broadcasting corporations by the winners of *Land* elections. However, this is where federalism provided another safeguard against majoritarian dominance of the entire system. Taking the country's broadcasting system as a whole, there were important regional counterbalances, reflecting the country's variable political geography. Since both main party parties had their heartlands, there were certainly some regional corporations where the Social Democrats tended to be in the ascendant, and others dominated by the Christian Democrats. Political bias was often quite clearly reflected in the regional 'third' channels. However, since the other programmes of the regional corporations were networked by the ARD there was still a systemic confrontation and counterbalance of political orientations in the first national channel. The second national channel, the ZDF, as a collective organisation of all the *Länder*, similarly displayed this systemic balance. All these factors meant that no single political party ever enjoyed undue influence over the entire public-service broadcasting system. In Germany, Left and Right each gained 'their share' of the broadcast media.

Italy: the 'partyocratic' model

Italy presented an interesting variant; its broadcasting system moved from a lengthy post-war period of majoritarian, one-party domi-

nance to a state of multi-party politicisation lasting from the late 1970s through the 1980s. In the 1990s it then reverted to a brief state of executive dominance before this model too was thrown into question. That broadcasting was politicised reflected what the Italians themselves called *partitocrazia* or 'partyocracy'. This was a rather extreme version of the German 'party state' or *Parteienstaat*. Through patronage networks, positions of influence in all areas of Italian public life, including the public-service broadcasting channels, were allocated according to party loyalties. For a long period, this assured the predominant Christian Democrat party (the DCI) a large measure of control over the state broadcasting service, the RAI. However, as Mazzoleni (1992, p. 81) has described, in 1975 a reform of the system 'opened up control over RAI to a plurality of political forces, supplementing the Christian Democratic influence with lay and democratic socialist elements'. Control of RAI now became the responsibility of a parliamentary commission composed of forty representatives drawn from all the parties. However, consensus between them was very elusive. Under these circumstances, control was divided between the main political parties on a channel by channel basis. This produced a kind of 'external pluralism'. The Christian Democrats remained most influential within RAI 1, but the Socialists dominated RAI 2, and the Communists the rather 'highbrow' RAI 3. In effect, (not unlike the Dutch case) the Italian viewer could choose the ideological flavour of the news and current affairs programmes that s/he watched (Barile and Rao, 1992, p. 262).

For years this remained the pattern. However, in 1994, briefly, a return to executive dominance seemed likely. The old parties of the Establishment, the Christian Democrats and Socialists, collapsed in the wake of grave corruption scandals. Into the vacuum now stepped the media baron Silvio Berlusconi who deployed his virtual monopoly of private commercial broadcasting – this having been steadily acquired during the 1980s – in order to set up a new 'party' of the Centre-Right. *Forza Italia* was far more a media-created social movement than a conventional party. It derived its strength from the support it gained from Berlusconi's three national commercial television networks rather than from any developed organisational base. Nevertheless, backed by a very partisan media campaign, it won the 1994 elections. Berlusconi was able to head a government in alliance with the 'post-fascist' National Alliance and the ideologically mixed northern Italian regionalists. Amid controversy, the RAI board

resigned and was replaced with new political appointees. Managerial changes ensued within RAI. A controversial plan to run a series of information slots advertising the government's programme was blocked by the media Guarantor. All in all, the question of media control in Italy caused huge political rows. However, Berlusconi's premiership proved to be very short-lived. His coalition lacked ideological or programmatic cohesion and it collapsed in the last days of 1994. Thereupon, Italy's President Scalfaro was called upon to appoint a new 'technocratic' caretaker government which soon let it be known that it would attempt to curb Berlusconi's media power. Italy's constitutional court, too, ruled in favour of a popular referendum on whether Berlusconi should be divested of his private broadcasting monopoly. For a brief moment, in the early 1990s, the politicisation of Italian broadcasting had promised to emulate that of Gaullist France. Nonetheless, the Italian people voted in 1995 to allow Berlusconi to keep his channels.

Towards a classification of patterns of politicisation of public-service broadcasting

This survey clearly has not covered all countries in Western Europe. Yet it points to some interesting patterns. French public broadcasting stood out as being conspicuously prone to capture exclusively by the party or parties forming the presidential majority. This could be explained in large measure by the fact that the French broadcasters operated within a centralised, statist and majoritarian polity (in the sense that 'winners took all' after elections). Certainly, it might be pointed out, Britain's political system was no less majoritarian (and given the two-party system arguably more so). However, in France electoral majoritarianism was combined with an intense rivalry, an historic polarisation, between the countries' parties. As a result the parties had consistently proven themselves incapable of producing consensual 'rules of the game'. As Kuhn (1995, p. 9) has explained, 'the post-war British concept of a consensual middle ground cutting across the two-party division and underpinning a public service approach by broadcasters to political coverage has been an alien one in French party politics'. It is interesting that public broadcasting in 1980s Greece arguably much resembled the situation in France under de Gaulle. Following the end of military rule in 1975, Greece opted

for a centralised quasi-presidential system along French lines. Moreover, the party system produced a distinctly majoritarian system of government. As historically was the case in France, polarisation between the political parties presented little scope for reaching a British-style 'gentlemen's agreement' over broadcasting. Given the *dirigiste* state tradition, the absence of a self-regulatory tradition, and the marked culture of patronage politics, it was unsurprising that Greece's public broadcasters were subjected to excessive executive domination (Katsoudas, 1985; Papathanassopoulos, 1990).

By contrast, countries with institutional mechanisms and political traditions geared more towards political 'power-sharing' provided pluralism, even if they were politicised. The Dutch model was even predicated on a degree of politicisation, yet it counterbalanced bias with an external pluralism of programmes. Majority domination was impossible. In different ways, a number of other of Europe's more consensual systems combined politicisation with political pluralism. The case of Germany has been highlighted. Austria and Belgium have also been mentioned; Meier and Trappel (1992, p. 135) refer to the 'massive political influence in personnel decisions' in these two cases (see also Trappel, 1990, p. 33). In both, however, there existed a tradition of inter-party cooperation and a respect for political proportionality (*Proportz*). The Scandinavian democracies also deserve a mention. They were countries with a distinctively consensual corporatist political culture. They had strong traditions of open government and parliamentary accountability as well. Among them, Denmark's broadcasters were the most vulnerable to party politicisation. Its broadcasting council (regulator) even became known as the country's 'mini-parliament', its politically appointed members as 'radio politicians'. Nevertheless, the council was composed largely to reflect the party balance in parliament; the executive's representation was weak. Sweden resembled Britain's model of broadcaster 'relative autonomy' or 'arm's length influence'. Controversy over political bias in programmes was fairly rare. In strongly corporatist Sweden, the 'popular movements' – voluntary organisations and socially relevant groups – actually owned a 60 per cent majority stake in the broadcaster's parent company. This acted as an important shield between state and the programme companies. Again, the regulators reflected broadly the party political balance in parliament.

The Italian case was highly idiosyncratic; it veered from one model to another. However, this could be explained by reference to

Table 4.6 A classification of some Western European public broadcasting systems according to patterns of politicisation

<i>Executive or single party dominated</i>	<i>Arm's length influence</i>	<i>Multiparty/group dominated</i>
France	Britain	Germany
Italy (until 1975)	Sweden	Austria
Italy (1994)		Italy (post-1975)
Greece		Denmark
		Netherlands
		Belgium

squarely political factors. In the first place, the political culture was very different to the northern European countries just mentioned. It shared with the other countries of Mediterranean Europe a culture of clientelism. This was rooted in historic patron-client networks but it clearly persisted throughout the post-war period of democracy in the shape of the 'partyocracy'. However, only two parties were strong: the Christian Democrats and the Communists. For a long period the system was polarised between them. The Christian Democrats dominated Italian government, while the Communists were effectively excluded from the system as pariahs. Under such conditions, as in Gaullist France, the spoils of power – including control of broadcasting – flowed exclusively to the Christian Democrats. Over time, though, the Italian system moved shakily towards a more consensual model; at least the polarisation diminished. In particular, the Christian Democrats became reliant on their main coalition partners, the Socialists; and the Communists became more or less fully legitimised within the system. This explained the shift from majoritarian-style dominance of public broadcasting towards a pattern of multi-party dominance. However, in Italy consensus was always fragile; stable compromises between the parties remained difficult to attain. Power was not easily shared. What then was more natural than to share out the channels between the main parties? This created a semblance of consensus. When finally the partyocratic model collapsed from its own corruption, briefly a media tycoon assumed office.

Berlusconi, it should be recalled, arguably owed his political career to the fact that since the mid-1970s he had acquired a quasi-

monopoly of private commercial television. Elsewhere in Western Europe the public-service broadcasting monopoly (or duopoly) prevented this kind of political entrepreneurship by rich and powerful citizens. The broadcasters may have been subject to bureaucratic party pressures, but generally there existed a degree of political pluralism. This section of the chapter's focus on the 'closeness to the political realm' of public broadcasters should not overshadow the undoubted achievements of public-service broadcasting. Social minorities were provided for, at least more than in commercial systems. Cultural standards were also maintained. Localism, regionalism and linguistic communities were certainly catered for. Accountability mechanisms, although they were bureaucratic and aloof from the average viewer, marked the public service model out as distinct from the commercial media. All the same the price for these achievements seemed to be a vulnerability to political influences that ranged from the discreet power of an establishment in Britain to outright dominance by the political executive as in France. In between, lay the European norm of politicisation by 'party cartel' (Katz and Mair, 1995).

Guide to further reading

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