

Public Media Autonomy and Accountability: Best and Worst Policy Practices in 12 Leading Democracies

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Public media's contributions to democracy are well established. Less widely known are the specific policies that make these contributions possible. This study finds that professional autonomy and civic accountability in public media are supported by (1) funding established for multiyear periods; (2) legal charters that restrict partisan government influence while also mandating the provision of diverse, high-quality programming; (3) oversight agencies, whose "arm's length" independence from the government in power is bolstered through staggered terms and the dispersal of authority to make appointments; and (4) audience councils and surveys designed to strengthen links to diverse publics. Public media governed by policies that continue and extend, rather than depart from, these best practices will likely be the most successful in maintaining their civic mission online.

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Public media's contributions to democracy are well known (Aalberg, 2015) and have often been demonstrated in the crucible of crisis. For example, the BBC in the United Kingdom and DR in Denmark were far ahead of most commercial media in challenging their governments' policies during the Iraq and Afghanistan wars (Barnett, 2005; Bondebjerg, 2009). Large-scale content analyses consistently show that in northwest Europe and North America, public media tend to offer more in-depth, diverse, and critical public affairs reporting than their commercial counterparts (Aalberg & Curran, 2011; Cushion, 2012; Cushion, Lewis, & Ramsay, 2012; Esser, 2008). Curran, Iyengar, Lund, and Salovaara-Moring (2009) find that robust public media in Denmark, Finland, and the United Kingdom are part of the reason that citizens are better informed in these countries than in the United States, with its highly commercialized media: Strong public service television, they demonstrate, "encourages higher levels of news consumption and

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contributes to a smaller within-nation gap [in public knowledge] between the advantaged and disadvantaged" (p. 22). In their comparative study of Denmark, Germany, Spain, and the United Kingdom, Albæk, van Dalen, Jebbil, and de Vreese (2014) similarly conclude that well-funded, strong public broadcasting is a crucial ingredient in the "right mix" (p. 170) that ensures a constructive relationship between political journalism and democracy.

Although we find these positive assessments generally convincing, it must be acknowledged that some publicly funded broadcasters are less than civically optimal, producing content that uncritically reflects the views of those in positions of power or that fails to attract audiences representative of the citizenry as a whole. Inadequate funding can contribute to such problems, but even more important are the roles played by legal and organizational structures specifying where that money comes from, how it is used, and who decides.

These structural frameworks shape public media's contributions to democracy by strengthening or weakening professional autonomy and civic accountability—two goals that are closely related but not identical. Autonomy has been linked to the flourishing of aesthetic and intellectual creativity and risk taking (Hesmondhalgh & Baker, 2011). Likewise, democratic normative theory highlights the need for media to be civically accountable—that is, to respond to public needs for comprehensive, critical, and diverse content (Christians, Glasser, McQuail, Nordenstreng, & White, 2009). Sociological theory (Bourdieu, 2005) suggests that such civically useful content is more likely to be produced when journalists and other cultural producers have greater autonomy from partisan political and economic pressures; even so, civic accountability often needs to be incentivized and encouraged through specific policy measures (Benson, 2013; Eberwein, Fengler, Lauk, & Leppik-Bork, 2011). These twin goals are captured well in the words of a recent Goldsmiths University of London inquiry on the future of public service television:

The BBC . . . needs governance and regulatory structures that will allow it to exercise a meaningful degree of independence while at the same time ensuring that it can be held to account when it fails to serve its audiences adequately. (Puttnam, 2016, p. 65)

Thus, this study seeks to provide provisional answers to the twofold, interrelated question: What specific policies contribute to professional autonomy and civic accountability in public media?

Although substantial research has been conducted on public media, there exist few comprehensive attempts to synthesize this literature and create a systematic typology of policies relevant to democratic normative concerns of autonomy and accountability. Such a typology is valuable not only for scholars but for policy makers, journalists, activists, and concerned citizens. For national media systems in which public broadcasters face strong challenges, our evaluation can help reframe current debates over media policies. The core question is not *whether* public media have central roles to play in the digital era, but *which* government policies best ensure that they meet democratic normative ideals for professional autonomy and civic accountability.

Data and Methods

What are the concrete policy measures that shield public media from corrupting external influences (professional autonomy) while ensuring their commitment to a civic democratic mission (civic accountability)? To answer this question, we documented and analyzed the policy measures that 12 leading democracies use to support public media. The public media in these democracies display variations in their policy frameworks that together allow us to distill a set of optimal or nearly optimal policies for autonomy and accountability. The selection of these 12 democracies is aimed at separating the best public media (the United Kingdom, Germany, and the Nordic countries) from others that struggle in their civic roles. Therefore, we include in this selection instructive examples of public media grappling with threats to autonomy and accountability (chiefly in the United States, France, the Netherlands, New Zealand, Canada, and Japan). This is admittedly a nonrandom sample weighted toward national media systems in northwest Europe, North America, British Commonwealth countries, and Japan (a country whose public media system was initially heavily influenced by the BBC). Our findings may apply in varied ways to other media systems, but these systems are not included in our analysis, and thus we cannot directly speak to their specific requirements and performance, which have been addressed by other authors.¹

For each nation-state, we examined governmental source documents in order to identify the specific means that policy makers use to promote and protect quality public media, both off-line and online. We complemented these data with a comprehensive review of the scholarly literature on public media in each country, as well as e-mail correspondence to confirm our reading of the documents and literature with 33 scholars and government regulators with expertise on public media in the countries examined.²

Our aim, based on the virtual consensus in the literature that singles out the United Kingdom, Germany, and the Nordic countries for exemplary public media news content outcomes (Aalberg & Curran, 2011; Albæk et al., 2014; Curran et al., 2009; Esser, 2008; McQuail, 2003), is to explore in systematic comparative fashion the kinds of policies that unite these high-performing countries. Tambini's (2015) recent analysis of how public service media around the world are adapting to the digital era lends support to our selection of a best-practices sample dominated by European countries: "Only in Europe are the institutions of independent (public service media) in a strong position" (p. 1420). Best policy practices in the four domains that we analyze contribute to this position, which is most clearly marked (although not uniform) in northwest Europe. Problems encountered by European countries that have departed from these best practices, such as the Netherlands and France, and nation-states outside of Europe, including the United States, New Zealand, Canada, and Japan, are analyzed to provide further depth to our analysis.

¹ For discussions of Spain, Poland, Ireland, and Italy, see Brevini (2013); Hanretty (2011); and Sehl, Cornia, and Nielsen (2016). For a meta-analysis of digital trends across 56 countries, based on the Open Society Foundation's studies of digital transition efforts by private and public media in those countries, see Tambini (2015).

² See Benson and Powers (2011) for a complete list of experts consulted. This article updates and deepens the analysis of that earlier report while also fully incorporating the United States in the sample.

Our study is delimited by sample selection, policy focus, and methodology. Left out of the sample selection are other European nation-states such as Italy and Spain, where publicly funded media have struggled to maintain their autonomy both historically and in present efforts to adapt to a digital future (Brevini, 2013; Hanretty, 2011). It is possible that countries outside of our sample with significantly different policies might also perform well, though in our view probably not to the same high level. In our focus on policy, we do not follow other scholars who have delved into the organizational cultures and varying degrees of professionalism that also shape public media (Hanretty, 2011; Sehl et al., 2016). Finally, the empirical analysis is not exhaustive: Although we note the relevant secondary literature, we do not link policies to new primary data on news content.

Findings

We detail the measures in each of the four public media policy domains—funding, administrative and legal charters, oversight agencies, and audience councils and surveys—aimed at ensuring professional autonomy and civic accountability. Although an “ideal type” public media system could be drawn from these domains, we do not argue that such a system could be created out of whole cloth. Instead, we offer an analysis of these domains as a contribution to policy debates that are shaping contemporary public media and that take different contours depending on local contexts. We conclude by examining how protections in each of these domains can be extended to meet the needs of the public as content platforms, audiences, and civic obligations transition to the digital era.

Funding: Amount, Source, and Length of Time

Per capita public spending for Europe’s most admired and most popular public media outlets (the United Kingdom’s BBC, Sweden’s SVT, Finland’s Yle, Denmark’s DR, Germany’s ARD/ZDF, and Norway’s NRK) ranges from \$100 to \$177 (U.S. dollars). At the other extreme, the worst funded public media systems in our sample, such as those of Canada (\$31), New Zealand (\$25), and the United States (\$3), have had the most difficulties ensuring wide diffusion of independent, civically oriented programming. (See Table 1 for the type and amount of funding as well as television market shares³ for the public media discussed in this article; all funding figures are converted to U.S. dollars.)

Public media receive funding from multiple sources and for varying lengths of time. License fees set for multiple years appear to provide the strongest protection for public broadcasters’ autonomy, because they lessen the capacity of the government to directly link funding to approval or disapproval of specific programs. By contrast, direct government appropriations, especially those set annually, put public media in a more precarious position vis-à-vis government influence. Regular review of spending is required to curb waste, and the public media systems in our study include mechanisms to ensure financial effectiveness and efficiency. When direct government appropriations are the primary means of funding,

³ TV market shares remain crucial given that 86% of European Union residents age 15 and older watch TV daily compared to 60% who accessed the Internet every day (European Commission, 2014). Further research is needed in this area, but Alexa (<http://www.alexa.com/topsites/countries/SE>) Internet audience country rankings also show that public media are often among the most viewed websites.

however, the “arm’s length” relationship between public service media and the state is at greater risk of being compromised.

Table 1. Funding and Audience Shares of Public Media in 12 Leading Democracies.

Country	Total revenue (millions)/ % public funding ^a	Per capita total revenue	Per capita public funding ^b	License fee or equivalent	Multiyear funding	TV audience market share ^c
Norway (NRK)	918 (95%)	185.42	176.60	Yes	No	41.3%
Germany (ARD/ZDF) ^d	12,846 (86%)	157.04	134.70	Yes	Yes	42.9%
Denmark (DR, TV2/Denmark A/S)	1,200 (57%)	215.33	122.57	Yes	Yes	66.0%
Finland (Yle)	627 (96%)	116.25	111.69	Yes	No	41.8%
Sweden (SVT) ^e	1,101 (96%)	116.56	111.35	Yes	Yes	35.3%
Netherlands (NPO)	1,419 (79%)	85.01	67.21	No	Yes	33.6%
United Kingdom (BBC) ^f	10,323 (61%)	163.19	99.96	Yes	Yes	31.0%
Japan (NHK)	5,582 (97%)	44.02	42.59	Yes	No	26.5%
Canada (CBC)	1,711 (64%)	48.67	31.21	No	No	5.5%
New Zealand (NZoA/TVNZ)	381 (29%)	85.18	24.98	No	No	10.5% ^g
United States (CPB)	2,778 (38%)	8.85	3.32	No	No	2.0%
France ^h	6,651 (81%)	101.79	81.98	Yes	No	30.6%

Note. All figures are in U.S. dollars, and currency exchanges have been calculated using Oanda Currency Converter for July 1 of the year for which funding data are available.

^a Funding numbers are derived from the following sources: For all Western European countries, 2011 figures from European Audiovisual Observatory (2012); for Japan, fiscal 2015 budget from NHK (2015a); for Canada, 2013 figures from CBC/Radio-Canada (2013); for New Zealand, 2013 figures from New Zealand TV (2013) and NZ On Air (2013); for the United States, 2012 figures from the Corporation for Public Broadcasting (CPB, 2012).

^b Per capita calculated by dividing total funds by total population as reported by World Bank (2016), except Japan, which was calculated using 2015 total population from Trading Economics (2016).

^c Audience share percentages are derived from the following sources: For Western European countries, 2013 percentages for “public channels” and “total BBC” in European Audiovisual Observatory (2014; daily shares), except for German percentage, which is 2012 daily shares in European Audiovisual Observatory (2013); for Japan, NHK (2015b; NHK’s weekday share of average daily time spent watching TV); for New Zealand, NZ On Air (2013; Radio New Zealand National’s 2012 nationwide share); for Canada, Canadian Broadcasting Corporation’s (CBC’s) 2011–2012 “viewing share” for English-language services, excluding Quebec’s Francophone market, in Canada Radio-television and Telecommunications Commission (2013); for the United States, Noam (2009; “total day shares”).

^d German numbers include ARD, Deutschlandradio, Deutsche Welle, and ZDF.

^e Swedish numbers include Sveriges Radio AB, Sveriges Television AB, and Sveriges Utbildingsradio AB.

^f UK numbers include BBC Group, Channel 4 Group, S4C, The Services Sound and Visions Corporation.

^g New Zealand audience share is for Radio New Zealand. New Zealand has no public TV channel: TVNZ is a commercial channel that airs some publicly funded content from New Zealand On Air, which is comparable to the CPB in the United States.

^h French numbers include ARTE France, Audiovisuel Extérieur de la France, La Chaîne Parlementaire Assemblée nationale (LCP-AN), France Télévisions, Public Sénat, Radio France, and TV5 Monde.

In theory, different types of funding can be mixed and matched in innumerable ways. In practice, three models predominate: first, systems that are funded primarily or exclusively by license fee funds (Japan, Norway, Sweden, Finland, the United Kingdom); second, systems that complement license fees with commercial revenues (France, Germany, Denmark); and, third, systems that mix general tax revenue and commercial revenues (Canada, the Netherlands, New Zealand). The United States constitutes its own category, combining general tax revenues, commercial underwriting (a soft form of advertising), and philanthropy.

License fees are set aside solely for public media, whereas direct government appropriations mean that public broadcasters must compete with other general-tax-supported programs in the national budget. The Netherlands replaced the license fee with direct government appropriations in 2000, with one result being a gradual decline of funding in subsequent years (Papathanassopoulos, 2007): The government has said additional cuts are planned for 2016 and 2017, along with the mergers of several public-broadcasting associations. Finland has also moved away from a traditional television license fee but has replaced it with a dedicated public media tax that citizens pay regardless of device used: Such device-neutral, universally paid fees preserve a "public good" concept of broadcasting and thus can be seen as "an extension of the traditional license fee" (Syvertsen, Enli, Mijøs, & Moe, 2014, pp. 78–79).

Although advertising potentially provides a measure of independence from the state (but at the price of increasing commercial pressures), the license fee is broadly recognized as a guarantor of both autonomy and civic accountability as well as a means to provide a direct link between broadcasters and the public (Syvertsen et al., 2014). As Papathanassopoulos (2007) has argued, in contrast to the license fee, "direct public or government funding may, in one way or another, seriously affect public broadcasters' independence, or in the best case, the public perception of their independence" (p. 156). Despite chronic issues with viewers who avoid paying them (Saikonnen & Häkämies, 2014; Sehl et al., 2016; Syvertsen et al., 2014), license fees historically have had "a social dimension" in that, "by contributing to their national public broadcaster, citizens felt that it was more accountable to them than to the politicians" (Papathanassopoulos, 2007, p. 156).

In the U.S. context, public broadcasters have long argued that direct charitable contributions from local citizens to local stations serve a similar role (Waldman, 2011). An important difference, however, is that the amount of revenues raised by charitable contributions is miniscule compared to that from a license fee. Moreover, only a very small portion of the citizenry contributes, and they tend to be more educated and wealthier than the general population, creating pressures to orient programming

toward this elite subpopulation (Starr, 2001). U.S. public media's reliance on philanthropy has also created pressures to skew content to meet the demands of major donors. In recent years, several funding scandals have revealed the depth of the problem: In 2012, the Public Broadcasting Service (PBS) created a multipart series on the U.S. economy sponsored by Dow Chemical that closely tracked the company's major business interests; in 2013, it created a documentary about drones funded by Lockheed Martin, a drone manufacturer; and in 2014, it created a series entitled *Pension Peril* about the problems caused by public employee pensions, funded by a billionaire investor's personal foundation that was actively lobbying state legislatures to eliminate pension programs (Sirota, 2014). As PBS's ombudsman ruefully admitted: These scandals "shine a light on . . . ethical compromises in funding arrangements and lack of real transparency for viewers caused, in part, by the complicated funding demands needed to support public broadcasting" (Getler, 2014, para. 4). While the federal government provides well under half the funds for most stations and programs, this contribution remains crucial for some of the most hard-hitting investigative programs, such as the documentary series *Frontline*. As one *Frontline* producer publicly remarked, public funding has been decisive, because "corporate sponsorship" or "large significant philanthropic" donors have been even less willing than government to support their critical mission.⁴

Advertising funding tends to dilute the public service mission, thus diminishing the difference between public service and commercial television channels. For instance, research has shown only minor differences between the private TF1 and public France 2 evening news (Benson, 2013);⁵ however, France has attempted to compensate for this blurring of the lines by placing extra public service demands on other public channels that receive less or no advertising, such as France 3 and ARTE (a French-German jointly funded channel).

In addition to the amount and type of funding, the length of funding period is also an important mechanism for protecting professional autonomy. In countries like the United Kingdom, Denmark, Sweden, and Germany, license fee funding is established for multiyear periods, thus reducing the government's ability to directly link funding to either approval or disapproval of programming. The lengths of funding periods vary from two years (Germany) to six (the United Kingdom).

In countries with direct government appropriations, such as the Netherlands (since 2000), New Zealand, Canada, and the United States, appropriations typically are set on a yearly basis. In Canada, the annual appropriation process has kept the Canadian Broadcasting Corporation (CBC) "on a short leash," thus "making long-term planning difficult" (Skinner, 2008, p. 16); annual funding reviews also subject the CBC to a greater degree of partisan upheaval than does the British model of financing via license fees (Trudel & Abran, 1996).

It should be noted, however, that license fees may also be established on an annual basis, as is the case in Japan, Norway, Finland, and France; this is not optimal for funding security, but in practice the

⁴ Remarks by *Frontline* producer David Fanning, Free Press Media Reform Conference, Boston, April 9, 2011.

⁵ The elimination of prime-time evening advertising on French public television, begun under the Sarkozy administration in 2008, does not seem to have shifted this tendency.

mere existence of a dedicated license fee has tended to insulate funding decisions from the political pressures common to direct funding regimes (Syvertsen et al., 2014).

In the United States, no laws or regulations guarantee multiyear funding of the government-established Corporation for Public Broadcasting (CPB), which in turn allocates funding to programs and local stations affiliated with PBS (TV) and National Public Radio. By tradition only, congressional authorization of funding has been on a two- to three-year cycle, but actual appropriations of funds are always annual. Conservative congressional critics have frequently used the annual appropriations process to complain about public broadcasting's supposed liberal bias (e.g., by broadcasting documentaries about global warming; see Russo, 1999, p. 160). This constant criticism from the Right has had a chilling effect on PBS's and National Public Radio's capacity to produce independent, critical reporting of government and politics (Hoynes, 2007). As recently as 2013, multiyear authorization levels were overridden by annual appropriations, resulting in a 5.2% reduction in previously committed funding (CPB, 2013).

Administrative and Legal Charters

Charters establish and protect the central missions of public media by specifying their civic duties and limiting government interference. Strong charters provide a legal basis for non-interference from government as well as clear language that calls for public media to provide content not provided by commercial media in sufficient quantity or quality, such as children's educational and public affairs programming (Curran et al., 2009; Sihvonen, 2015). Though overly constraining charter language is a potential problem, in practice the greater danger has been posed by a particular form of what New Zealand media scholar Peter Thompson (2012) calls "strategic ambiguity": weak mandates with overly generic language that leave public media more vulnerable to the winds of change in government policy.

Most charters and related laws explicitly restrict the capacity of governments to influence programming in partisan directions. Norway's Articles of Association stipulate that the public broadcaster must be able to "operate freely and independently in relation to persons or groups that, for political, ideological, economic or other reasons, wish to exert control on its editorial content" (NRK, 2010, para. 33). This clear delineation of boundaries helps explain why the public broadcaster has been able to combine "strong governmental influence at the structural level . . . with a high level of autonomy in programming" (Roppen, 2008, p. 80). A similar charter in the United Kingdom is established via negotiations between the BBC and government every 10 years. Between these periods, the BBC enjoys significant autonomy from governmental interference.⁶ Sweden's SVT is also governed by a multiyear charter (SVT, 2012). In nearly all countries studied, charters prohibit the top executive or the political party in power from unilaterally appointing or removing the leaders of public broadcasters (with the notable, but temporary, exception of France, as discussed below).

⁶ Remarks by then BBC director general Mark Thompson, "Public Media in a Digital Age," New America Foundation and Free Press, Washington, DC, October 5, 2010. Puttnam (2016), however, calls for getting rid of the charter system and putting the BBC "on a statutory footing through a new act of parliament" (p. 62).

In some countries, charters set forth the technical criteria by which funding is determined. In Germany, an independent commission—the *Kommission zur Ermittlung des Finanzbedarfs der Rundfunkanstalten* (KEF), literally, “Commission for the Determination of the Financial Needs of Broadcasters”—sets the fee based on the budgetary plans of the public broadcasters. Typically, the KEF’s recommendation is enacted through an interstate agreement between the various Länder (German states, which have sole responsibility for culture and media; Bron, 2010). The agreement is almost always pro forma, and the exceptions prove the rule (Humphreys, 1996). In 2004, for example, a number of Länder refused the KEF’s proposed license fee hike, and the issue went to the Federal Constitutional Court of Germany, which ruled in 2007 in favor of the public broadcasters. The German court argued that when the political field begins determining funding, public broadcasters would “no longer be availing themselves of a freedom, but merely be executing predetermined programmes” (Karstens, 2007, para. 3).

Administrative and legal charters also set forth mandates to achieve civic goals, such as providing educational content, supporting cultural programming, and including diverse voices (BBC Trust, 2010). Norway’s NRK is obligated to provide minimum levels of news and current affairs programming as well as specific amounts of children’s content. By law, it must submit an annual report to the Norwegian Media Authority detailing its fulfillment of these mandates (NRK, 2010), though the Norwegian Media Authority has no legal right to intervene directly in NRK’s programming decisions. Most other countries in our sample do not set specific quotas; instead, public broadcasters are required and expected to reach diverse audiences through quality programming.

Even in countries where the public service broadcaster is relatively weak, charters task public media with providing content that is often neglected in commercial media. For example, the New Zealand Broadcasting Act of 1989 established New Zealand On Air (NZoA) as an autonomous government entity with primary responsibility “to reflect and develop New Zealand identity and culture by (i) promoting programmes about New Zealand and New Zealand interests; and (ii) promoting Maori language and Maori culture” (New Zealand Parliamentary Counsel Office, 1989, p. 35). At the same time, Thompson (2012) has noted that policy changes in the wake of Center-Right party triumphs in 2008 resulted in a “further dilution of the media’s civic accountability” (p. 109). These changes included the abolition of the charter for public service broadcaster Television New Zealand, replacing it with vague language about the range and quality of content. Through such ambiguity, TVNZ could be more easily directed by “the government’s transitory policy priorities” (p. 109).

Once again, the United States also provides a mostly cautionary tale. The original Public Broadcasting Act (CPB, 1967) created the private, nonprofit CPB to provide limited coordination of the hundreds of preexisting local public radio and television channels. CPB is charged with facilitating programs of “high quality, diversity, creativity, excellence, and innovation” (p. 23) and making them available to local stations. However, CPB itself is prohibited from owning stations or directly producing programs. CPB’s capacity to implement its mandate is weakened by congressional requirements that most of its funds go directly to local stations, producing a “Balkanization” of the public media network designed to keep it weak (Aufderheide, 1996). As Wick Rowland, public media scholar and former CEO of Colorado Public Television, summarizes: The “complex, inter-institutional bureaucratic negotiation process” required to produce any national programming under this system effectively “saps the vitality, imagination and

daring that otherwise might have become the hallmarks of contemporary public television" (cited in Engelman, 1996, p. 171).

Arm's Length Oversight

All public media outlets in the countries studied have oversight agencies and administrative boards. There are two broad types of oversight agencies. "External" agencies, like the United Kingdom's Ofcom (Office of Communications) and the Norwegian Media Authority in Norway, ensure that public broadcasters meet their public service obligations while also serving as an administrative buffer from political pressures. "Internal" boards—usually comprising independent trusts or foundations—directly oversee management of the public broadcaster. In the United Kingdom, the BBC Trust currently performs this internal function, while leaving day-to-day decision making to an executive board; plans are now under way to join the Trust and the executive board into a new "unitary board."⁷ The Swedish public broadcaster, SVT, is likewise owned by an independent foundation specifically designed to insulate it from both state and market pressures (SVT, 2012).

The independence of oversight agencies or boards is bolstered through various means: staggered terms, dispersed appointment power, and inclusion of members representing various public groups and forms of expertise. In Sweden, the foundation's board consists of 13 members, including the chair, who serves a four-year term; other members' terms last eight years (Förvaltningsstiftelsen, n.d.). Terms are staggered: Half the board leaves every four years. Parliament begins the process with each party recommending members (based on party affiliation but also expertise in the areas of media, law, business, and the arts). Sweden's ruling government then makes appointments from this list. Since 2007, regulations specify that all parties in parliament must be represented on the board.

Additionally, in many of the countries examined the authority to make appointments is dispersed across political and administrative offices. For example, the German KEF consists of 16 members (KEF, 2010). Each Land appoints one expert from a given field (it is prearranged what field the expert must come from—typically, law academia, business, politics, and media); subsequently, the 16 Land premiers decide together on all KEF members.⁸

Diversity of membership is also required for the broadcast councils that internally oversee Germany's public service broadcasters. Such councils are found at each public broadcaster and are responsible for electing broadcasting directors, advising on program design, monitoring compliance with program standards, and approving the budget and annual report (Humphreys, 1996). These councils also set out the general programming guidelines for the public service broadcasters (e.g., the mixture of scheduled programs), consistent with the public service mandate established via treaty among all the regional Länder governments that programming should be comprehensive, including entertainment as well

⁷ Puttnam (2016) raises concerns that this unitary board will place government-appointed members much closer to BBC operations decisions, and thus recommends development of an "independent appointments process" (p. 63).

⁸ E-mail correspondence with Horst Wegner, general secretary of KEF, October 11, 2010.

as news, and that there should be a plurality of opinion (Khabyuk, 2010). Council members typically are representatives of unions, trade and industry groups, churches, universities, and cultural institutions. In the past, many members have had allegiances to particular parties. Due to the federal nature of the broadcasting system, though, it has been difficult for any one party to influence programming decisions, leading Humphreys (1996) to write that “no single party ever enjoyed undue influence over the entire public service broadcasting system” (p. 153).

In contrast to the relatively robust firewalls in the United Kingdom, Germany, and the Nordic countries, France, Japan, and the United States have struggled to maintain protections from partisan political meddling. After being under the state’s thumb during the de Gaulle years, French public television gradually won a measure of autonomy during the 1980s and 1990s. In 2008, however, the Sarkozy administration reasserted presidential authority to directly appoint the public broadcaster’s director. Then, in 2013, the tide turned again when a Socialist Party–controlled parliament reversed this provision and restored the authority of the Conseil supérieur de l’audiovisuel (i.e., High Council for Broadcasting) to name the director of France Télévisions (Conseil supérieur de l’audiovisuel, 2013).

Although Japan’s Broadcast Law prohibits political “interference in programming” (Krauss, 2000, pp. 96–97), Japanese politicians periodically have been accused of attempting to exert influence on NHK news. In 2005, allegations surfaced that portions of a 2001 program on “comfort women” linking Emperor Hirohito to the World War II policy of “sexually enslaving women for the Japanese military” had been removed in response to political pressure (Krauss, 2006). The allegations, though denied by both NHK and other government officials, nevertheless demonstrated NHK’s continuing vulnerability to political interference, given the weak autonomy of its oversight board as well as the broadcaster’s reliance on annually renewed funding levels. More positively, the controversy demonstrated the persistence of journalistic and public expectations that such partisan influence is improper.

In the United States, the president, subject to Senate approval, has sole authority to appoint the nine members of the CPB’s board of directors, each serving six-year terms (with the possibility for one consecutive reappointment). No more than five board members can belong to the same political party (CPB, 1967). The 1992 amendments to the 1967 act specified that board members’ terms must be staggered in two-year increments so that only three members’ terms end in the same year. Historically, however, “board members have been appointed on the basis of political patronage rather than expertise,” thus “compromis[ing] CPB’s capacity to defend the integrity of its programming” (Starr, 2001, p. 26). CPB’s statutory requirement to monitor the “objectivity and balance in all programs or series of programs of a controversial nature” has primarily been wielded by conservatives fearful of liberal bias (CPB, 1967, p. 4). Far from ensuring public media independence and quality, CPB oversight has mostly created a climate of fear and caution among public media journalists (Hoynes, 2007).

Audience Councils and Surveys

All countries in this study have formal mechanisms to link public media to their audiences, though which audiences count the most is sometimes in dispute. These links are forged in myriad ways, including

through boards of citizens and experts as well as national surveys at regular intervals. Well-designed avenues for public input maximize pluralism by allowing a wide range of voices to enter the conversation.

For example, in the United Kingdom, audience councils—established by law in the most recent royal charter—must be “consulted on the BBC’s performance in promoting [its] public purposes” (United Kingdom Department for Culture, Media and Sport, 2006, p. 15). The councils must in turn publish an annual report assessing how well the BBC meets license payers’ needs. In Denmark, an eight-member independent regulatory authority (the Radio and Television Board) must include one person nominated by the Cooperative Forum for Danish Listeners and Viewers Association (Denmark Agency for Culture and Palaces, 2010).

Public surveys are common forms of audience input. Such surveys, in principle, are not the same as commercial marketing research, though the lines can sometimes become blurred. Public media have an obligation to serve a broad, diverse audience that extends beyond advertisers’ desired demographics, and carefully designed surveys can help accomplish this goal. In Canada, a report card based on public surveys gauges how well services fulfill mandates under the Broadcasting Act (CBC/Radio-Canada, 2013). Annual surveys also are conducted in Finland and New Zealand (NZ on Air, 2013; Yle, 2013). Japan’s NHK conducts a nationwide audience survey biannually (NHK, 2015b).

Paying attention to audiences does not have to mean pandering to them. For instance, the small public service media channel ARTE (funded jointly by French and German license fees and other government revenues) fills its television schedule (and website) with 40% documentaries and a range of cutting-edge arts programs precisely because it is committed to serving a variety of underserved niches as well as attempting to create new demand rather than responding only to a preexisting demand (ARTE, 2016).⁹

Audience input in the form of opinion surveys can also provide public broadcasters with an additional buffer against partisan political pressure. Tunstall (2010) writes:

Although many British politicians have tried to steer the BBC in particular partisan directions, most such attempts have been somewhat hesitant and of limited success. Both the relevant politicians and the relevant senior civil servants recognize the BBC usually scores more highly in opinion polls than does the incumbent government. (p. 149)

In the United States, local public broadcasters are required to establish community advisor boards in order to receive CPB funding. Audience members who donate, however, effectively have the most input over programming. With federal dollars making up only 15% of station operating budgets, “it is the audience member with disposable income who must be courted with programs that keep the checks

⁹ Remarks by Elke Blocher, chargée de communication, and Uwe Lothar Müller, rédacteur en chef adjoint ARTE Reportage, ARTE headquarters, Strasbourg, France, June 24, 2016, Rodney Benson field notes.

coming in during the periodic on-air fundraisers" (Avery, 2007, p. 361). In similar fashion, a recent inquiry into the future of the BBC (Puttnam, 2016) expressed concerns that the BBC is moving in a direction that will sacrifice "underserved audiences" (both regional and socioeconomic) while "superserving the literate, articulate and wealthy" (p. 59).

Public Media in the Digital Era

Digital services have become an important battleground for public media. The public media outlets that seem most capable of making the transition are those that have followed similar policy paths from the broadcast era, such as maintaining or adapting funding mechanisms separate from annual government funding, providing content not available on commercial media, and seeking public input.

Funding structures from the pre-Internet era have a significant effect on online expansion efforts. Brevini (2013) found that the BBC's "huge resources" have enabled it to "offer wide-ranging outputs, from educational and cultural programmes for the web, to news, public affairs and interactive forums" (p. 147). Many countries are adjusting their license fee structures to account for the proliferation of digital devices, which provide multiple access points for content. Whereas license fees once were determined simply by the presence or absence of a television in the home, countries such as Denmark have altered this definition to include any device that can display television content (Syvertsen et al., 2014). These policy changes are intended to address increasing costs, which have not been met by proportional increases in license fees or government appropriations, and adapt to shifting media consumption patterns involving access to multimedia content across multiple devices. In 2013, Germany moved to a flat-rate, per-household license fee. The "one residence, one fee" system is promoted as a means of enabling access to content across multiple devices without having to pay multiple fees (ARD, ZDF, & Deutschlandradio, 2015).

While advertising or online merchandising might seem to offer additional means of funding public media's online expansion, public service broadcasters face stiff opposition, both from commercial media and government regulators, which are raising the specter of unfair state-sponsored competition against market actors (Nieminen, 2010). Some commercial owners see public media's access to public funds and even advertising as unfair competition¹⁰ and have portrayed public media as obsolescent in the digital age. Syvertsen et al. (2014), however, show that in Nordic countries public service broadcasters are the only broadcasters providing locally produced, innovative, and experimental content on the extended channel spaces opened up by digitalization. The loss of a commercial broadcaster would have little effect on the overall content mix, yet "if either the main channel or the in-depth channel of a national public service broadcaster went off the air . . . the scope, quality and diversity of the national television output would be dramatically reduced" (p. 81). Public service broadcasters can also play active roles in helping audiences navigate networks in which information is abundant but substantial amounts of civic affairs content can get lost in the noise (Burri, 2015; Helberger, 2015).

¹⁰ E-mail correspondence with Kjersti Thorbjørnsrud and Audun Beyer, University of Oslo, October 5, 2010. See also Puttnam (2016).

Where public broadcasters have not expanded online, it has been largely due to legal constraints stemming from commercial media opposition. For example, in Denmark, associations representing commercial media have gathered strong political backing for banning or restricting public broadcaster DR's online services. With the recent adoption of a media policy agreement for 2015 to 2018, DR's existing online services remain intact, and a panel of experts will be asked to "clarify the future role of public service media" (Søndergaard, 2014, para. 11). Germany's public broadcasters also have struggled with legal and political pressures as well as an organizational culture that perhaps is not as "pro-digital" as those found at public broadcasters like the BBC and Yle, which draw large audiences to their online offerings (Sehl et al., 2016).

Successful transitions online seem to find the right balance between predigital missions emphasizing diverse and civic-oriented content and strategies to take advantage of Internet affordances to expand and enhance offerings. Surveying available studies of the digital roles for public service media in 56 countries, Tambini (2015) found "there are some cases where audience decrease, a tightening of the remit, and funding reductions create a self-reinforcing spiral of decline, and some others in which innovation and new services create a virtuous circle of reform" (p. 1420). Initiatives that extend roles for public service broadcasters online can enable such innovation, helping these broadcasters avoid a catch-22 in which they find themselves competing with commercial broadcasters by producing similar populist content or sticking to old remits that feed perceptions that they are "dull and old-fashioned" (p. 1411).

Moreover, the license fee and similar universally paid fees, such as Finland's Yle tax, remain relatively firm foundations for the extension of public broadcasting into the online media ecosystem (Sehl et al., 2016). Compared to tax exemptions and distribution support, whose benefits to newspapers decline along with drops in circulation, license fees constitute a "partial exception" to Nielsen's (2014, p. 15) warning of the negative consequences of freezing media subsidies in their 20th century forms.

Conclusion

This study used comparative policy research to describe how several leading democratic nation-states foster relatively autonomous and accountable public media. No one right policy solution exists, but our research highlights four crucial domains that can help make a difference: funding, charters, oversight agencies, and audience councils and surveys. Within these domains, we identify the following best practices that promote professional autonomy and civic accountability: (1) funding that is relatively generous, funneled through a dedicated fee rather than general tax revenues, and established for multiyear periods, which lessens governmental capacity to directly link funding to approval or disapproval of programming; (2) legal and administrative charters that restrict government's ability to influence programming in a partisan direction while also mandating the provision of high-quality programming that caters to diverse audiences; (3) oversight agencies that serve as arm's length buffers between public media and the government in power, and whose own independence is bolstered through staggered terms and the dispersal of authority to make appointments; and (4) audience councils and surveys that strengthen links to diverse publics.

Our research highlights the notable strengths of public media systems in the United Kingdom, Germany, and the Nordic countries, all of which are likely to have policy strengths in these four domains. In contrast, public media have been weakened in recent years in the Netherlands and New Zealand due to erosion of procedures for ensuring arm's length autonomy from direct governmental control (e.g., shifting from license fees to direct government funding in the Netherlands; abolishing TV New Zealand's charter). Canada's public media system, already relatively weak, has remained vulnerable to political pressures because of its reliance on direct government funding, which has been cut in recent years. The U.S. public media system likewise continues to struggle with both political party and philanthropic pressures due to its weak institutional autonomy, government underfunding, and reliance on private donors to make up the shortfall. Public media in the United States, Japan, and France have all struggled to preserve their autonomy from partisan political meddling due to relatively weak legal and regulatory protections.

It is important to stress, however, that even in countries where public media operate under less than ideal regulatory and funding conditions, they retain a certain distance from market pressures and thus tend to provide at least some types of valuable content ignored or downplayed by their commercial peers (Benson, 2013). Conversely, even the best public media are far from perfect and do not go as far as many smaller-scale alternative media in criticizing the status quo or giving voice to individuals and groups at the margins (Couldry & Curran, 2003). The funding and administrative procedures we have identified help protect public media from short-term government pressures, but they cannot entirely overcome deeply entrenched long-term influences related to the shared class interests and social networks of many elite politicians, regulators, and public media professionals (Williams, 1973).

Given these caveats, our research helps move the debate about public media beyond the simplistic dichotomy of state versus market—especially in the United States, where the legitimacy of noncommercial public media continues to be contested (Pickard, 2014). The use of self-limiting rational-legal authority (Hallin & Mancini, 2004) helps account for the seeming paradox at the heart of this study: Public media systems that are highly regulated but in clearly stated, nonpartisan terms (as in Germany, the Nordic countries, and the United Kingdom) tend to achieve greater autonomy and accountability than public media systems that are loosely regulated and exposed to greater pressures from the market, philanthropy, and political parties. Our findings provide additional and updated support for Hallin and Mancini's (2004) claims of significant policy differences between public media in democratic corporatist systems and those in liberal (including Japan and New Zealand, which have been most influenced by this model) and polarized pluralist systems, while also calling attention to differences within these systems (including the major exception of the United Kingdom). Given that France is the only polarized pluralist nation-state in our sample, further research is needed to confirm the existence of consistent regulatory and content differences between the democratic corporatist and polarized pluralist models.

Admittedly, we do not explore the full range of external factors—such as levels of societal inequality and accessibility and quality of education—that contribute to stronger or weaker public media in our sampled countries. Future research should explore not only the effectiveness but the efficiency of public media policies: Are public funds being spent in the best possible way? Identification of systematic cross-national regulatory and funding differences is a necessary precondition for answering such important questions.

Are public media doomed to obsolescence in the digital era? Certainly, they face new challenges online (Glowacki & Jackson, 2014). We need to better understand the ways that strong public media interact with private media to either increase, decrease, or maintain diversity in the increasingly interconnected digital media ecology. Although there are considerable pressures to compete directly with commercial outlets and to monetize online platforms and content, most leading public media continue to emphasize their core civic missions, even if in some cases they might do more (Sjøvaag, Moe, & Stavelin, 2012). To date, it seems that the countries that have made the transition most smoothly are those that have extended—rather than drastically changed—their off-line best practices. Whether public media continue to offer unique, civically valuable content to sizable audiences will be up to the policy choices we make now and in the future. We hope that our study will lay the groundwork for future research on public media, both off-line and online, that comprehensively documents the linkages between specific policies, professional practices, news content outcomes, audience engagement, and public opinion formation across a larger sample of European and non-European democratic nation-states.

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