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**What's wrong with media monopolies? A lesson from history and a new approach to media ownership policy**

**Steven Barnett**

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**Steven Barnett** ([s.barnett@wmin.ac.uk](mailto:s.barnett@wmin.ac.uk)) is Professor of Communications and a prominent writer and broadcaster on media issues. He specialises in media policy, regulation, history and journalism, and has been adviser to the House of Lords select committee on Communications for its inquiries into News and Media Ownership (07-08) and the Film and TV Industries (09-10). He is currently working on an AHRC funded project on media ownership, journalism and diversity. His immersion in media policy analysis goes back 25 years, during which time he has advised a number of government and opposition spokespeople, given evidence to parliamentary committees and the European Parliament, and has directed numerous research projects on the structure, funding, and regulation of broadcasting in the UK and other countries.

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# What's wrong with media monopolies? A lesson from history and a new approach to media ownership policy <sup>1</sup>

Steven Barnett

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## ABSTRACT

It is almost universally accepted within advanced industrial democracies that concentration of media ownership within too few hands contradicts the basic tenets of democracy, threatening diversity of expression and risking autocratic control of communicative spaces. Although these principles of diversity and pluralism have routinely underpinned American and European policy statements on media ownership, recent policy initiatives have moved inexorably in the opposite direction, towards relaxation of restrictions and hence greater consolidation. These trends have been exacerbated over the last two years by a sustained economic recession, allied to structural shifts in advertising revenue, which have left hard-pressed media enterprises lobbying intensively for even greater deregulation. This paper argues that the dire state of the media industry, which threatens the very existence of public interest journalism, may demand a more benign response to arguments for corporate consolidation than traditionally articulated by critical scholars. It suggests that the focus of regulatory intervention should switch from structural regulation which prevents greater concentration of ownership to content regulation which imposes substantial public interest obligations on the output of media businesses in return for a less restrictive corporate environment. It examines the early monopoly days of commercial television in the UK, and argues that the clear regulatory imperatives then imposed on monopolistic licensees offers a policy benchmark for permitting greater consolidation today while safeguarding vital public interest content. While a broad legislative framework currently exists, the paper argues that it would require a significantly more ambitious range of public interest requirements rooted in a normative vision of journalism's contribution to a healthy democracy.

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## **MEDIA OWNERSHIP: THE THEORY**

Why is concentration of media ownership so routinely condemned? It has been axiomatic since the emergence of a press that is not irredeemably allied to the interests of the State or to party political factions that plurality of media ownership is an essential element of a healthy democracy. The fewer owners or gatekeepers, goes the argument, the fewer the number of voices and the more damaging the consequences for diversity of expression. Not only will fewer interests be represented but there will be fewer opportunities for elites to be held properly to account: less opportunity to 'tell truth to power'. Scholars traditionally root their arguments in enlightenment philosophy. Hume, for example, emphasised the connection between distrust of government and the freedom of the press, which provided a bulwark against the arbitrary exercise of power (Holmes, 1990). To this watchdog or critical function of the press has been added both the informative function and the representative function: furnishing citizens with the information they need to participate knowledgeably in a democracy; and providing a two-way communicative mechanism which conveys the collective or competing wishes of electorates to elite groups and vice versa (Meiklejohn, 1960).

Traditionally, again in the spirit of post-enlightenment thinking, these arguments have focussed mostly on institutions of government: in the context of media ownership, interpretations of democracy have thus been couched in terms of fostering a clash of ideas and providing opportunities for conflicting world views or competing policy initiatives. Influenced partly by the oppressive power of the state and military apparatus during the 18<sup>th</sup> and 19<sup>th</sup> centuries, and more recently by the brutal extinction of freely constructed debate in authoritarian regimes which emerged in Germany and Italy as well as South American, African and Middle Eastern countries, the emphasis in debates around media concentration has been firmly on the need to promote diversity and prevent autocratic control of communicative spaces (Keane, 1991). Most recently, the seemingly unfettered media control of Italian Prime Minister Silvio Berlusconi has served as a warning of the dangers of undue media concentration.

In the United States, arguments have tended to focus more on the corporate world-view being expounded by a tiny group of oligopolistic industrialists, whose efforts at global dominance have been accelerated by their cosy relationship with succeeding administrations. In describing the five 'global-dimension' conglomerates which dominate the American media

landscape Bakdikian (2004: 4) declares that '[n]o imperial ruler in past history had multiple media channels that included television and satellite channels that can permeate entire societies with controlled sights and sounds'. McChesney (2000: 2) takes the argument further by stating that the media have become a significant *anti*-democratic force in the US (and beyond) by stifling civic and political involvement, and that '[t]he wealthier and more powerful the corporate media giants have become, the poorer the prospects for participatory democracy'. As well as more generalised charges of commodification and corporatisation of public media spaces, American critical scholars have over the years produced a number of stories about some of the consequences of oligopoly and centralisation, such as a Clear Channel 'local' radio station missing a major nuclear dumping story because its journalism had been delocalised (McChesney, 2000).

These generally descriptive approaches have been eloquently encapsulated within a more analytical and critical framework by Edwin C. Baker who propounded three main reasons for opposing ownership concentration. First, is the argument for a more democratic distribution of communicative power. This does not rest on empirical verification because '[w]hether ownership dispersal actually leads to such content or viewpoint diversity turns out to be a complex and contextual matter' (Baker, 2007: 15). Baker refers back to an important decision by the US Federal Communications Commission in 1975 when it argued, in rejecting an application for combined ownership of a local newspaper and TV station, that 'it is unrealistic to expect true diversity from a commonly owned station-newspaper combination.'. The US Court of Appeals observed, in concurring with the decision, that 'diversity and its effects are...elusive concepts, not easily defined let alone measured without making qualitative judgements objectionable on both policy and first Amendment grounds'<sup>2</sup>. The principle here is one of egalitarianism and fairness, as with democratic systems of voting, whether or not one can adduce supporting empirical evidence.

The second argument Baker describes as 'democratic safeguards'. This is partly the familiar protection against a single individual or ideology wielding unchallenged, autocratic power. Even without the empirical and historical evidence of the terrible consequences of such untrammelled power, argues Baker, and even if such power were seldom realised 'the democratic safeguard value amounts to an assertion that *no democracy should risk the Banger*' (2007: 16, emphasis in original). Further democratic safeguards were an increase in

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<sup>2</sup> Both quotes are taken from SINCLAIR BROADCAST GROUP v. F.C.C , 284 F.3d 148, US Court of Appeal, 2002.

the number of decision makers in a position to commit resources to 'watchdog' journalism; and a reduction in the risk of co-option of media operations by powerful political or economic interests.

His third argument revolves around the relentless focus on profitability which tends to be most marked among the larger publicly quoted conglomerates. The drive for higher profit margins places downward emphasis on operating costs which, in turn, drives down investment in journalism. These structural pressures are an inevitable consequence of large, centralised corporations but are less acute and less visible in non-profit institutions, private foundations or charitable organisations.

## **HISTORY OF UK MEDIA OWNERSHIP POLICY**

Policy makers in the UK have followed the spirit of these diversity arguments for at least 50 years. Part of the rationale for the establishment of a commercial television network in 1955 was a reaction against the BBC's monopoly voice in broadcasting, despite its established reputation for impartial coverage. According to one liberal economic analysis of the pre-competition BBC, '[c]riticism of the monopoly was largely based on the threat to freedom of speech and expression which was thought to be implicit in the monopoly' rather than on competition as a means of improving programmes (Coase 1950, quoted in O'Malley 2009: 23). And the subsequent structure of commercial television itself, divided into first 17 and later 15 separate franchises, was predicated to a large extent on the desirability of reflecting local and regional diversity. The Independent Television Authority (ITA), which had statutory responsibility for overseeing the new commercial channel, could have chosen a unitary system for operating the new channel, inevitably centred on the metropolis. Instead, in the words of the Pilkington Committee which was set up to review the future of broadcasting in 1960:

The Authority chose the "plural" system because it wanted to realise the benefits of a decentralised form of organisation: that is, to encourage the development of a service which would tend to portray a variety and diversity of character and attitude, rather than to concentrate on those of London and the Home Counties (1962: par 533).

A crucial consideration of the Pilkington Committee, raised in the House of Commons in February 1961, was the question of concentrated ownership across different means of

communication and, in particular, whether there was an implicit threat to democracy for control over newspapers and television stations to be vested in the same hands. The committee's report specifically addressed the potential danger:

The threat is thought to reside in the fact that, because two of the media of mass communication are owned in some measure by the same people, there is an excessive concentration of power to influence and persuade public opinion; and that, if these same people are too few or have broadly the same political affiliations, there will be an increasingly one-sided presentation of affairs of public concern. There might, too, be a failure to present some of these affairs sufficiently or at all (ibid: par 627).

Section 12 of the subsequent Television Act of 1964 conferred on the ITA the power to suspend operation of an ITV franchise if any newspaper shareholdings 'has led or is leading to results which are contrary to the public interest'. While not in themselves particularly draconian, these provisions were interpreted by the ITA – and by its successor regulator the Independent Broadcasting Authority – as effectively debarring significant simultaneous press and TV interests.<sup>3</sup>

Discretion stayed with the regulator until legislation enshrined in the 1990 Broadcasting Act restricted any interest by a national newspaper owner to 20% of a terrestrial TV licensee. In the 20 years since then, Britain has seen two major government policy statements on media ownership from either side of the political spectrum. Each has laid great rhetorical emphasis on the fundamental importance of pluralism and diversity of voice to a democracy. In 1995, the then Conservative government published its proposals for a partial deregulation of media ownership in which it was unequivocal about the importance of avoiding too much concentration:

A free and diverse media are an indispensable part of the democratic process. They provide the multiplicity of voices and opinions that informs the public, influences opinion, and engenders political debate. They promote the culture of dissent which any healthy democracy must have.... If one voice becomes too powerful, this process is placed in jeopardy and democracy is damaged. (Department of National Heritage, 1995: 3).

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<sup>3</sup> The ITA's robust interpretation of this provision was demonstrated at the end of 1970 when it prevented Rupert Murdoch – by then owner of the popular national *Sun* and *News of the World* newspapers – from effectively taking over the lucrative London weekend franchise (Docherty, 1990: 69-75; Shawcross, 1992: 157-8). It was a rare setback for News Corporation.

This statement of principle reflected a commitment within government to protecting a 'market-place of ideas', which ministers did not believe could be secured through wholesale deregulation (personal interview, 2009)<sup>4</sup>. The subsequent 1996 Broadcasting Act therefore allowed for a measure of consolidation in anticipation of digitalisation and new technologies, but deliberately prevented investment in terrestrial television by major newspaper proprietors.

Five years later, the succeeding Labour government published its own consultation on media ownership rules in which it again emphasised the importance of diverse media sources in fostering public debate in a democratic society: 'We want a plurality of voices, giving the citizen access to a variety of views.... A healthy democracy depends on a culture of dissent and argument, which would inevitably be diminished if there were only a limited number of providers of news'. (DCMS, 2001:7). This, too, was followed by legislation which further relaxed restrictions on consolidation within ITV and, for the first time, allowed major newspaper proprietors to own a terrestrial television channel.

Thus, despite a policy rhetoric which consistently emphasises pluralism, the UK has seen an inexorable shift towards a relaxation of ownership restrictions resulting in greater permitted concentrations. This trend follows similar experiences not just in the US but throughout Europe (Ward, 2004), and I have examined elsewhere the confluence of three identifiable causes of this policy shift: increasing financial muscle of global corporations, constantly seeking new expansion and investment opportunities; emergence of a dominant free market ideology which has emphasised liberalisation and deregulation while opposing state intervention; and a technological convergence of computer, screen and print, driven by digitalisation, leading policy-makers to question the efficacy of any cross or intra-media regulation (Barnett, 2003).

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<sup>4</sup> Interview with Lord Inglewood, Minister for Broadcasting 1995-6, 18 November 2009. The desirability of a 'balanced approach' was shared by the then Secretary of State, Virginia Bottomley, though fiercely opposed by some neo-liberal Conservative MPs. Greater deregulation was also supported, ironically, by the opposition Labour Party seeking to ingratiate itself with Rupert Murdoch (Barnett and Gaber, 2001:69-70)



## **THE CONTEMPORARY POLICY ENVIRONMENT**

These pressures have been exacerbated over the last two years by three further factors. First, a recessionary environment which has left media companies facing the most fundamental transformation in their history, and which has particularly afflicted journalism enterprises at local and regional level. Over the last two years, redundancies have been announced on virtually every national newspaper in the UK as well as most of the major regional groups. Second, this cyclical pressure has been compounded by a structural shift of advertising revenue from traditional media – especially press – to the internet. Third, audiences in the electronic media are fragmenting in response to digital profusion and (albeit slowly) moving away from non-linear patterns of consumption. The end result is an unprecedented global transformation in the news business (Currah, 2009; Fenton, 2009).

It is thus scarcely surprising, in an industry which routinely demands opportunities for expansion in economic boom times, that its leaders should be pleading for further consolidation as a means of salvaging media businesses. The argument, based both on economic and democratic grounds, was recently put in stark terms to the Office of Fair Trading by an economic consultancy which advises a number of media companies:

The risk is that titles will be closed without exploring consolidation as a solution simply because of the merger regime, and the result will be a needless loss of jobs and local news, as well as plurality since there is no replacement for local media once the shutters have been closed for good. The internet have-nots, such as the elderly and the low income, could lose the vital lifeline provided by local media in terms of the information that really matters to them (Enders Analysis, 2009).

It is equally unsurprising that both government and regulator should be more receptive to industry demands in such straightened times. In a consultation document for its second triennial review of media ownership rules in July 2009, Ofcom emphasised the 'need to consider the pressures on sustainability of businesses for delivering news content. If businesses are struggling to be sustainable and the rules are hindering their ability to respond to market conditions, then there may be a case for recommending a change to the rules.' (Ofcom, 2009b: 29). Its provisional recommendations included removal of local radio ownership restrictions, and liberalisation of local media cross-media restrictions to allow simultaneous ownership of any two from local newspapers (with 50% plus local market share); a local radio station; and a regional Channel 3 licence. It proposed no change to national ownership or cross-ownership restrictions nor, crucially, any revision of the media

public interest test which allows the government to intervene on plurality grounds. Unsurprisingly, these recommendations were confirmed in Ofcom's final recommendations in November 2009, where liberalisation at the local level was considered to be 'the correct balance between allowing greater flexibility for industry while retaining protections for plurality' (Ofcom, 2009c: 21). These recommendations will almost certainly be implemented by the government.

## **RETHINKING THE CRITICAL RESPONSE – A HISTORICAL ANALOGY**

The traditional response from critical scholars to further liberalisation proposals is to condemn them unequivocally as antagonistic to pluralism and diversity. Given the unique economic and industrial circumstances outlined above, I believe it is time to rethink these instinctive objections and to reconfigure the nature of the critical debate. For it is becoming increasingly difficult to refute the argument that the very existence of professional, well-resourced journalism is under threat, and that some form of radical intervention is not just inevitable but essential. To put it bluntly, there is little point in clinging to structural solutions for preserving pluralism, when the very structures themselves are in danger of extinction – carrying with them all meaningful forms of journalistic endeavour. Given that the alternative may be no journalism at all, now may be the time for scholars to switch the focus of their attention from *structural* regulation to *content* regulation as a means of securing diversity of media output.

Before elaborating on this argument, it is perhaps important to establish how – despite the persuasive counter-arguments outlined by Baker above – it may be possible to countenance less structural diversity without prejudicing the public interest, as long as certain very specific institutional and regulatory conditions are met. The early, monopolistic years of commercial television in the UK offer a potential model for sustaining democracy-enhancing journalism without structural diversity.

This is not the place to delineate a history of the statutory, regulatory and institutional structures which governed that monopoly (see among others Curran and Seaton, 2010; Fitzwalter, 2008; Seymour-Ure 1996; Sendall 1982). There were, however, two crucial elements of relevance to contemporary policy. First, from its founding in 1955 to the birth of

Channel 4 in 1982, ITV was granted a monopoly of television advertising<sup>5</sup>. After some difficult early years, commercial television established itself with both audiences and advertisers: revenues flowed and profits soared. As late as 1986 this arrangement, far from being condemned, was being described as one of the fundamental principles of public service broadcasting: competition for audiences based on principles of quality and diversity, rather than competition for the same source of revenue (Broadcasting Research Unit, 1985).

Second, with the privilege of monopoly, came a series of responsibilities enshrined in statute and implemented by a regulator obliged to act in the public interest. Through successive acts of Parliament and through regulatory fiat, ITV was obliged to carry a mandated television news service to compete with the BBC; regional news and current affairs funded by each contractor; and current affairs journalism resourced and funded across the network. When the programme companies tried to circumvent their news responsibilities, the ITA laid down requirements about length, timing and quality of news bulletins. In 1967, it was the regulator who dictated to the ITV programme companies that they should have a half hour peak-time news bulletin, that it should start at 10 p.m. and that it 'should be heavily illustrated with still pictures and film' (Lindley, 2005: 87). ITV's independent news contractor ITN, which rapidly challenged the BBC in its scope and professionalism if not its scale, owed its existence and growth to a combination of regulatory intervention and the generous revenues facilitated by a private monopoly (Sendall, 1982; Cox, 1995).

Legislation also mandated peak-time current affairs, and regulation ensured that it was implemented and properly resourced. The result was ground-breaking, long-running television journalism in series such as *This Week* and *World in Action*, in return for a continuing monopoly. In the words of one historian: 'The commercial owners of the companies had not abandoned their aim of maximizing profits, but were very satisfied with their monopoly over advertising. It was a secure settlement which gave confidence to those who wanted to develop social and informational programming' (Holland, 2006: 58). In other words, current affairs on commercial television had both cash and commitment from the sponsoring companies; and although there was plenty of competition in programming from the BBC, the absence of competition for revenue allowed a generous – sometimes indulgent – investment in outstanding journalism (see also Fitzwalter, 2008; and Goddard et al, 2007). With the advent of free market politics, channel proliferation and competition for revenue,

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<sup>5</sup> In fact, its monopoly of advertising sales lasted until 1993; until that point, ITV was also responsible for selling Channel 4's airtime and thus retained its monopoly over television advertising.

that framework was progressively relaxed. Its legacy can still be seen today, in news if not in current affairs, in the requirement of the 2003 Communications Act that all the commercial public service channels should have an adequately resourced peak-time news presence. Beyond that, however, there remain very few journalistic imperatives in commercial television.

## **PROTECTING THE PUBLIC INTEREST IN A NEW MONOPOLY**

These precedents were established in very different political and economic times, but the driving forces were not dissimilar: fostering an environment where private sector profit was being channelled into journalistic enterprise according to public interest principles of democratic and civic value. The notion of a monopolistic 'quid pro quo' was a recognised part of a social democratic settlement. In today's straightened economic circumstances which threaten the essential democratic functions of journalism – though the concept would certainly offend free market ideologues – such a settlement could again be acceptable to mainstream political thinking.

In fact, the legislative framework already exists, albeit couched in wholly inadequate terms. It followed attempts by the Labour government in 2003 to relax ownership restrictions further, allowing major newspaper proprietors to own the commercial Channel Five and abolishing any restrictions on non-EU ownership of terrestrial TV licences (thereby permitting American corporations to buy ITV and Channel Five). In response, the House of Lords mounted a highly effective cross-party campaign, and ensured that new clauses were added during the parliamentary passage of the Communications Bill. These give the government powers to intervene in media mergers on specific public interest grounds.<sup>6</sup>

These 'safeguards' consist of two types of public interest consideration: one for newspaper mergers, and one for broadcasting or cross-media mergers. In both cases, the provisions are drawn in vague and non-specific terms which bear little relation to any normative understanding of journalism's role in a democracy.<sup>7</sup> In its report on media ownership last

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<sup>6</sup> Section 375 of the Communications Act inserted detailed, new provisions into section 58 of the 2002 Enterprise Act.

<sup>7</sup> More specifically, the newspaper test takes into account the need for 'accurate presentation' of news, for 'free expression of opinion' in the merging newspapers, and for a 'sufficient plurality of views' in the relevant newspaper market. The cross-media test assesses the need for 'sufficient plurality' in the relevant market; for high quality and a wide range of material; and for commitment to the harm, offence and impartiality requirements laid down by the Communications Act (Ofcom, 2009b: 80; Feintuck and Varney, 2006: 96).

year, the House of Lords Communications Committee recommended that the public interest test should be amended 'to refer specifically to a need to establish whether a merger will impact adversely on news gathering' (HL Communications Committee, 2008: par 243). This, however, is still too opaque and generalised. As I have argued elsewhere, 'the test as it stands appears to have very little to say about the relationship between the public interest, democracy and journalism' and a more detailed set of aspirations and regulatory requirements related to the practice of and investment in journalism is what is required to revitalise the democratic functions of journalism – especially if it is to act as a public interest safeguard within a more consolidated corporate structure (Barnett, 2009: 14). In other words, a set of detailed requirements would be laid down within an established regulatory framework – as existed during the monopoly days of commercial television – which would constitute the quid pro quo for further consolidation.

These requirements would be framed by a normative vision of how diverse and well-resourced journalism contributes to a healthy democracy, and would be designed to accommodate Baker's theoretical objections to consolidation outlined above. Requirements would include, for example, demonstrable safeguards for editorial freedom, written into employment contracts; guaranteed investment in training, with schemes and costs subject to auditable scrutiny; professional standards secured through formal commitment to codes of journalistic conduct; commitment to diversity of output and news agendas and, in particular, to investment in long-term investigative and accountability journalism.

It is the inexorable decline of this kind of watchdog journalism which most urgently demands remedial action. During 2009, the UK saw two national newspapers – despite their financial and readership struggles – playing a vital role in exposing wrong-doing in two major institutions. The Daily Telegraph's revelations about MPs' expenses, detailing how accounting rules were being systematically (and possibly fraudulently) exploited by Members of Parliament to supplement their salaries, have exposed serious constitutional weaknesses in the accountability system of elected representatives. And The Guardian's demolition of police claims about the death of Ian Tomlinson during G20 protest in the summer, including publicly released footage of the victim apparently being beaten by a police officer, has led to a major enquiry into the circumstances surrounding Tomlinson's death and more generally into police tactics for managing major demonstrations.

Meanwhile, at local level, less well publicised but nonetheless democratically vital campaigns continue to be fought despite the dire economic circumstances. In November 2009, a provocative article by George Monbiot in *The Guardian* claimed that most local journalism, far from being bastions of local democracy, 'exist to amplify the voices of their proprietors and advertisers' and actually contribute to 'the entrenched power of local elites.' And while the problem may be exacerbated by consolidation within powerful media corporations, argued Monbiot, the inherent problem for the local press is that 'they defend the powerful because the powerful own and fund them'. Within 48 hours, nearly 300 online comments had been posted, many from outraged local newspaper journalists giving concrete examples of successful if unacknowledged watchdog journalism at the local level<sup>8</sup>. Even those who acknowledged some truth in Monbiot's accusations argued that lack of resources and staffing was a far more credible explanation than corporate and editorial cowardice (Monbiot, 2009).

This critical function of journalism is also the most resource-heavy. It can be salvaged by allowing greater intra- and cross-media agglomeration, but only if allied to public interest obligations properly scrutinised and enforced. This is part of the logic behind current government proposals for Independent Funded News Consortia (IFNCs) outlined in the Government's 2009 policy statement *Digital Britain* which would allow regional news enterprises to bid for public funding to fill the regional news programme slots being vacated by ITV. A consortium could include 'newspaper groups or other newsgathering agencies', and contracts are to be awarded against public interest criteria including commitments to original and investigative journalism (DCMS/DBIS, 2009: 156-7). It is also the logic behind counter proposals backed by the Conservative opposition for 80 new Local Multi-media Companies (LMCs) which would combine the platforms of television, radio, print and web within cities or large towns but whose realisation is constrained, the report argues, by 'outdated' ownership restrictions (Parry, 2009: 4).

Neither proposal, however, attempts to articulate how these structural proposals, designed to liberate much-needed resources for investment in journalism and entailing substantial relaxation of local media ownership rules, are to be tied to content regulations which ensure that the civic and democratic values of journalism will be prioritised above the interests of share-holders and corporate profits. This is not an impossible task, either conceptually or in

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<sup>8</sup> These included campaigns to maintain funding of local hospitals; campaigns against major development projects opposed by local residents; and critical reporting of local councillors, local employers, local police chiefs, schools and local housing associations.

empirical realisation. As I have tried to show, historical precedent demonstrates that with sufficient political will it is possible to legislate for a prescriptive set of principles and practices which enshrine public service values – in this case, the values and objectives of well-resourced journalism. With a journalistically strong BBC providing structural plurality at both national and local level, and with sufficient safeguards maintained at the national level to avoid unrestrained abuse of media power, a substantial and detailed public interest test could safely allow greater media consolidation as a means of reinvigorating the critical and informational functions of journalism.

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The Editor of the series is Robin Mansell. The Deputy Editor is Bart Cammaerts. The editorial board is made up of other LSE academics and friends of Media@lse with a wide range of interests in information and communication technologies, the media and communications from a variety of disciplinary perspectives (including economics, geography, law, politics, sociology, politics and information systems, cultural, gender and development studies).

### **Notes for contributors:**

Contributors are encouraged to submit papers that address the social, political, economic and cultural context of the media and communication, including their forms, institutions, audiences and experiences, and their global, national, regional and local development. Papers addressing any of the following themes are welcome:

- Communication and Difference
- Globalisation and Comparative Studies
- Innovation, Governance and Policy
- Democracy, Politics and Journalism Ethics
- Media and Identity
- Media and New Media Literacies
- The Cultural Economy

Contributions are welcomed from academics and PhD students. In the Michaelmas Term each year we will invited selected Master's students from the preceding year to submit their dissertations which will be hosted in a separate part of this site as 'dissertations' rather than as Working Papers. Contributors should bear in mind when they are preparing their paper that it will be read online.

Papers should conform to the following format:

- 6,000-8,000 words (excluding bibliography, including footnotes)
- 150-200 word abstract
- Headings and sub-headings are encouraged
- The Harvard system of referencing should be used!
- Papers should be prepared as a Word file.
- Graphs, pictures and tables should be included as appropriate in the same file as the paper.
- The paper should be sent by email to:

Dr. Bart Cammaerts, Deputy Editor, Media@LSE EWP-Series ([b.cammaerts@lse.ac.uk](mailto:b.cammaerts@lse.ac.uk))  
Department of Media and Communications  
Houghton Street  
London  
WC2A 2AE

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