MEDIA DIVERSITY AND OWNERSHIP – SCOPING OUT AN AGENDA

Prepared by Raashied Galant – FXI

1. **Why and what is diversity?**

Diversity of the media is considered to be vital for guaranteeing pluralism of opinions [the market place of ideas]; adequate and multiple political representation and a citizen's participation in a democratic society. It is the broad belief that (the) media should reflect different interests, values and cultures in society, and provide access to the widest possible range of voices. While diversity and pluralism are linked, the terms are not used inter-changeably, but I'll come to those definitions later.

The notion of media diversity has long been articulated by media activists in Southern Africa. Some quick reminders are given here about this discussion; the efforts that have been devoted to it; and the issues involved.

Going back 20 years to the Windhoek Declaration of 1991, the development discourse was about "fostering an independent, pluralistic and free *press*" (own emphasis). The Declaration speaks exclusively about the press and doesn't use the term *media*, but I assume here in good faith that we can extend it to mean media in general (pg298 MISA.pdf). Notwithstanding that the media in general at that point in time in Southern Africa's history was a different (and smaller) kettle-a-fish to what it is now in 2011.

The Declaration's explanation of its tri-description of media is one that is free and "independent from governmental, political or economic control or from control of materials and infrastructure essential for the production and dissemination of newspapers, magazines and periodicals" (Point 2, pg298, MISA.pdf).

It goes on to say that a pluralistic media means "the end of monopolies of any kind and the existence of the greatest possible number of newspapers, magazines and periodicals reflecting the widest possible range of opinions within the community" (Point 3). And it goes on and on.

All-in-all though, it says that this type of media environment "is essential to the development and maintenance of democracy in a nation, and for economic development" (Point 1).

Between 1991 and now, the media throughout this continent, bar only a few countries, has altered significantly with the rise and rise of commercial press, broadcasting and Internet. South Africa, Kenya, Ghana, Nigeria and Egypt, are the poles of expansion when it comes to private, commercial, and community media in Africa (AMDI.pdf). Within these countries the media enjoy varying degrees of independence from government, political and economic control, or from control of materials and infrastructure. But that's another story.

While the notion and development of community media the world over has featured prominently in the debates around media diversity, the march of private, commercial and independent [from government control] media has dominated the discourse of diversity, particularly in Africa. In this context, it has been about numbers and platforms. Stuff like how many newspapers, radios, televisions, journalists, printing presses, telephones, cellphones, computers and internet access per capita in the country (AMDI.pdf; Berger.doc). This stems from a deep-seated ideological conviction and virtual "common-sense" stance that private, independent, commercial media are an essential

component of the development project in Africa. The mantra being: private media = democracy = development and/or democracy = private media = development.

Stemming from this, we have the discussions and proposals around the sustainability of the media, evidently to strengthen and advance the sector. Once again discussion is divided by community media considerations on the one hand, and development of the private, commercial sector on the other hand. Support for particularly the latter has led to the establishment over the past 20 years of regional media support and development organisations such as the Southern African Media Development Fund (SAMDEF), the West African News media and Development centre (WANAD), the Southern African Media Training Trust (NSJ), Southern African Media Trainers Network (SAMTRAN), the Institute for the Advancement of Journalism (IAJ), and locally-focused in South Africa – the Media Development and Diversity Agency (MDDA) and the National Community Radio Forum (NCRF). Except for the last two, their focus and support has largely been on supporting private commercial media.

The buzzwords around sustainability of the media is the "enabling environment". The environment in which this idealised diverse and plural media can thrive and survive. In broad strokes the discourse around this amounts to the creation of an enabling environment that consists of:
- strengthening regulatory frameworks to effectively separate government from state-funded media;

- the fair provision and allocation of licences and frequencies;

- the protection of journalists;

- regulations guaranteeing freedom of expression and access to information;

- fostering conditions for the growth of private media;

- strengthen existing media training programmes and courses at universities and other training institutes; and most notably from the media industrialists

- enacting access to information legislation, ending state monopolies of broadcasting, ending government control over telecommunications, industry as opposed to government regulation of the media and, legal reforms around defamation and insult laws to prevent criminalisation of content.

(See Declaration on Principles of Freedom of Expression in Africa, pg306, MISA.pdf; & AMDI.pdf)

Given all this, what has also happened in the past 20 years, is that media theorists *and* activists have made some new observations about the role, power and influence of media in society. And this brings us to the crux of the new dilemma around media diversity that we must grapple with in the 21st Century in *South Africa*.

Some of the various observations are that private, commercial media:

➔ **Are generally not free and independent of any government controls and regulations the world over**;
➔ **Will not serve the information needs of the people, but only those of a very small and privileged section of society.** [In *Manufacturing Consent* (1988), Ed Herman and Noam Chomsky show that because media is firmly imbedded in the market system, it reflects the class values and concerns of its owners and advertisers. They hold that the media maintains a corporate class bias through five systemic filters: concentrated private ownership; a strict bottom-line profit orientation; over-reliance on governmental and corporate sources for news; a primary tendency to avoid offending the powerful; and an almost religious worship of the market economy, devaluing alternative beliefs. These filters limit what will become news in

society and set parameters on acceptable coverage of daily events. See also Naom Chomsky's *Necessary Illusions – Thought Control in Democratic Societies* (1989).]

➔ **Will persistantly hide the continuous social contradictions and oppression of people and divert attention from it.** [Underwood D. 1995. *When MBAs Rule the Newsroom*. Crouteau, D. and Hoynes, W. 2001. *The Business of Media: Corporate Media and the Public Interest.*]

➔ **Will naturally move towards monopolization as opposed to pluralism and diversity.**

➔ **Will succumb to bottom line pressures and competition for larger audiences, the first casualty of which is a reduction [in some instances, wholesale] of in-depth and investigative journalism.** [McChesney provides a good chronicle of this process in American media. The net effect of this is that it militates against the media's potential to play both a watchdog role and provide a "voice for the voiceless", particularly against powerful corporate interests. And then also shift to tabloidization involving sensationalism, scandal, gossip, sex.]

➔ **Can effectively muscle-out views, voices, identities and discourses from public view, as it develops an homogenized audience and/or panders to the most viable audiences.** [Crouteau & Hoynes' *The Business of Media – Corporate Media and the Public Interest* (2001) systematically demonstrates how this occurs in a commercial corporatized environment. The opposite of this has been shown to occur with respect to community media, see Greyfelder.pdf & Vanzyl.pdf]

➔ **Will have nothing to do with any attempt to orchestrate structural change in society unless it is for the survival of the economic elite.** [Selected references from South Africa which show that this has already happened: Duncan.pdf; Jacobs.pdf ….exception – Venezuala, see Gollinger.doc)

➔ **Can manufactur and/or sustain or inflame social conflicts such as sexism, racism, homophobia, tribalism, violence against women, xenophobia and religious conflict (this can go for other media as well, but has largely been proven in private media).** [Among others - Rwanda; Serbia; Norway; South Africa]

Given all of this, the "common-sense" notion of media as an integral part of development in Africa remains the dominant paradigm through which the role of the private media is viewed. Furthermore, this notion has been tied to the discourse around the fundamental human rights of freedom of speech, freedom of expression and access to information. The notion is sustained trump-like and notwithstanding the above observations, on the basis of arguments around the idealised performance of the media in serving the information needs and interests of citizens by:

1. Playing a watchdog role to prevent government excesses (the celebrated "fourth estate" role);
2. Serving as a platform for a diversity of voices and to communicate citizens' needs, demands and concerns to government;
3. Providing a "voice for the voiceless" in the face of powerful corporate interests or intrigues; and
4. Facilitating the social cohesion and harmony of a democratic nation.

Diversity, multiplicity, pluralism and variety – defining the terms as they are used in this paper. Diversity and multiplicity concern mainly platforms, while pluralism and variety are mainly about content.

Diversity refers to the available media platforms or titles that citizens can choose from, and multiplicity is about the range of formats or programme types that can be utilized or accessed on the different platforms. Diversity in media ownership refers to the range and number of different owners.

Pluralism is about the range of socially-stratifying content (voices, opinions, ideologies, genres etc.) available across the media sector. Variety concerns the range of content types within a sub-sector or specific media title. Pluralism in ownership refers to the socially diverse nature of ownership.

2. Media types and definitions

South Africa enjoys a highly diverse and by world standards, very mature media environment. What is the measure of maturity? Who knows, but for me, it's the fact that we have several Apple stores in this country. What it means is that we have the full gamut of media types and platforms that is possible in a media society in this day and age. I list here platforms and some types of media available in South Africa

Platforms -

| Print | General daily newspapers, including tabloids weekly newspapers weekend papers small commercial local independent community free sheets ad sheets bi-weekly and monthly business papers grassroots local media consumer, celebrity and TV magazines local current affairs magazines independent, non-profit titles Magazines (select few) business to business titles (clicks club; edgars, woolworths, TV times) international titles local fashion and consumer titles niche titles / special interest independent titles (namaste, amandla | |

	•	
Over-the-air Radio	• public commercialised radio • private commercial radio • community radio • religious radio •	
Open television (Afrimap.pdf pg31).	• public commercialised • private commercial • community TV	

Pay television	• Includes open television
	• Movies
	• Special interest
	• Sport
	• Documentary
	• News
	• Music
	• Religious
	    • Country
	    • Language
	    • Culture
	• Business to business TV	

News agencies	Public commercial (SABC) private commercial (SAPA, EWN,) independent commercial (African eye, East Cape, West Cape news) non-profit (genderlinks; health-e) international bureaus (DPA; CNN; Reuters; AFP)	
Internet and mobile devices	All the types above, and more (with most weekly papers moving to daily); - International sites - local commercial (gumtree; kalahari; bizcommunity) - independent commercial and non-profit (ngo-pulse, pambazuka,	Social media

	amandla, - commercial blogs - mobile sites (mobytribe;	
Book publishing		
Distribution		
Printing		
Television production		
Radio production		
Cinema film production		
Cinema film distribution		
Music recording and distribution		
Advertising agencies		
Outdoor media		

All the above = communicative power in South Africa = communicative abundance
What are the new forms of power, exclusion, dominance and concentration emerging in/from this environment?

3. Measuring Diversity

The dilemma around media diversity is making the decisions around diversity of what content and which media. Up until now, the singular strategy for ensuring a diverse media environment has been to ensure a good mix of public, private and community media. Stemming from this have been the regulations, including that around ownership, informed largely by this policy.

But what is diversity then? (workshop)

Is it guaranteeing:

1. pluralism of opinions;
2. adequate and multiple political representation and;
3. a citizen's participation in a democratic society.

All of this is about the market-place of ideas.

Formula's for diversity -

- ✘ ownership diversity – source diversity
- ✘ market share
- ✘ viewership share
- ✘ ad revenue share / market share
- ✘ content diversity
    - ✘ programme / type

- ✖ demographic
- ✖ idea / viewpoint
- ✖ workforce diversity – source diversity
- ✖ horizontal exposure – distribution of audiences across content options / per company
- ✖ vertical exposure – diversity of content consumption with individual audience members

What about:

- Cultural (or is this vertical)
- Political

- Ideological

- Variety & creativity –
  - Citizen media imply that collectivities are enacting citizenship by transforming the mediascape, contesting legitimized identities and introducing new communication practices contrary to the mass, homogenized, uniform cultural categories – pg11 White.pdf
  - Citizens' media tend to be local, about supposedly everyday events, produced by people in the local groups for their own discussion or for exchange with other groups. Often citizens' media are not directly questioning power relationships but simply celebrating local culture and local people. The building up of confidence about the value of one's culture lays the groundwork for legitimating contestatory action. Pg11
  - Recent programmes of community radio, community video production and popular theatre have enabled women to reject hierarchical discourses and create a new mediated discourse in which their identities become part of the discourse. This can radically change accepted 'media languages' (Rodriguez, 2001:109–28). - pg12

- Opportunity & business – the language of the MDDA

The premise of ALL the above, is the market place of ideas. Ultimately though, while much of the debate on media pluralism deals with market structure or media ownership, the fundamental concern is usually with media content, or more precisely, with what people actually see and hear in the media (14). [Is this our concern too? What about government? What about media players? What about the mdda?]

4. What we know and what we don't know

We have a highly diverse media environment with a multiplicity of platforms and a great variety of media types. However, there is very little, if any, plurality around all of this. It is an old story.

References:
1. MMDA.pdf (*Trends of Ownership and Control of Media in South Africa)*
2. OMD.pdf (*South African Media Facts 2010*)
3. AMDI.pdf (*Africa Media Development Initiative – South Africa Report*)
4. Afrimap.pdf (*Public Broadcasting in Africa Series – South Africa*)

The growth in variety of media options has not been accompanied by a comparable growth of independent, diversely owned competitive communications services and media voices. The trajectory has been towards the increased concentration of ownership of individual media in fewer and fewer hands, as well as the development of integrated ownership patterns across several media.

Practically, it means a relatively small number of individuals decide on television programmes, newspaper leads, media investigations, and ultimately what will be reported. Agenda-setting and framing studies over the years have proven conclusively that the mass media, by emphasizing certain attributes of an issue, tell us "how to think about" this issue as well as "what to think about" (pg55 Cooper.pdf).

In the newspaper, magazine, pay-TV, book publishing, cinema film distribution, music, and outdoor media sectors, we find both concentration of ownership *and* concentration of market-share. Across the board, except radio and open TV, the sector is overwhelmingly white owned.

With respect to the sector that comprises small commercial papers, local independents, community free sheets and grassroots local media, in 2005 Justin Arenstein warned about the "Borg" syndrome [the Borg syndrome = "Resistance is futile. You will be assimilated."]:

> *Community print is...the only (print) advertising sector to show dramatic year-on-year growth over the past five years. In 2004, conglomerate community media posted a 51% increase, earning R605-million from above-the-line advertising revenue alone – and excluding revenue from inserts or other revenue streams. ...[The] old gentleman's agreement among the conglomerates around territorial spheres of interest and language markets has broken down.*

> *The conglomerates are aggressively challenging each other's dominance in the more lucrative provinces, in under-serviced regions, and in poorer rural regions that are predicted to be the target for future government development funding or major retail expansion. The stellar ad performance, the growing imperative to grow new markets, and the rise of vernacular media have all sparked a feeding frenzy that includes buy-outs, new titles and aggressive headhunting of successful entrepreneurial publishers and skilled production staff.*

> *Grassroots publishers are caught in the crossfire, or are being squeezed out of existence because they are unable to compete with the resulting heavily discounted ad rates and saturation distribution. Many of the larger grassroots publishers report being presented with ultimatums: sell or face direct and targeted competition from the conglomerates.*

> *...Caxton's establishment of its "Urban Newspapers" portfolio with plans for 11 new titles (most in Soweto), its buyout of the Rising Sun gr   oup in Kwa-Zulu-Natal, the expansion of its existing Gauteng motoring and property supplements to KZN, and the launch of the first in a planned network of 20 "community" magazines are perhaps the most notable indicators of the trend.*

> *KZN, in particular, is the scene of an escalating three-way turf war between Caxton, Media24, and Independent Group (IG). The Rising Sun Group of six newspapers and the North Coast Courier (in Ballito) purchases by Caxton appear to have prompted Media24 (through its local Witness Group) to purchase the South Coast Fever and Herald Group of newspapers – which in turn appears to have sparked an unusual alliance between Caxton/IG to launch a new freesheet in Pietermaritzburg in direct opposition to Media24's local neighbourhood titles. Caxton has also launched the first of its 20 new Get It community magazines in KZN's Newcastle district.*

> *The KZN turf war is mirrored in the neighbouring Eastern Cape, where Johncom and Media24 appear to be facing off following Media24's incursion into the Bisho and Umtata districts. Johncom has countered by launching an aggressive buying spree,snapping up ownership of 10 of the province's oldest, most credible, and/or most vibrant grassroots titles, including Talk of the Town and Grahamstown's Shoppa. Caxton expects to have launched all 11 of its planned new Soweto titles by the end of October, is*

buying out smaller independents in Mpumalanga (Lydenburg News and Barberton Times), as well as creating new community titles in the province (Mpumalanga Mirror and Corridor Gazette) and neighbouring Mozambique, and is also experimenting with a new concept provincial title targeting government and parastatal advertising and that is inserted into the group's existing network of community titles (thereby ensuring that existing ad revenues are not undermined).

Very little qualitative information is available, no formal research is being done, and little is being reported publicly on the trend. (own emphasis) (Arenstein.pdf)

Apologies for the lengthy quote, but it was a fascinating and spot-on description of what was happening on the ground. What has happened since then is that formal research has been conducted and we do have qualitative information and they confirm everything described above. We are in the age of the Borg!

MDDA report: pages 42, 44, 48, 52,
SA Media Facts : pg 26

What else do we know? Going back to some of the diversity formulas:

- ownership diversity (source diversity) - captured fully in MDDA report.
- market share / readership – OMD.pdf pages 21; 22; 24-30;
- viewership share - OMD.pdf pages 17; 20; 21
- listenership – OMD.pdf pages 22-23
- ad revenue share / market share - OMD.pdf pg 18
- content diversity
    - programme / type – for radio and TV see Afrimap.pdf pages 180-183
    - demographic – **NOT SURE**
    - idea / viewpoint – these would likely be from academic studies around agenda-setting and framing. Cursory glances for some topics/ideas/viewpoints are predictable, but in most cases it is not clear cut.
- workforce diversity (source diversity) – Genderlinks studies; Employment equity figures
- horizontal exposure (distribution of audiences across content options / per company) – For television, OMD.pdf pg 20
- vertical exposure – diversity of content consumption with individual audience members – OMD.pdf pg 17

What we don't know:
- idea / viewpoint / ideological diversity. Perhaps it is captured in the new book from Tomaselli Et el.
- Media corporations and business interlock – See AN & JIN.pdf (*Interlocking of newspaper companies with financial institutions and leading advertisers*) for a study in America on this.

Information on media diversity in South Africa is neither hidden nor unavailable.

In a classic case, and along the predictable lines of market logic, South Afria is seeing the *refeudalisation of its public sphere*. In short, this happens at the behest of the commercialisation of communication, and where information becomes a commodity for citizen consumption. Hence,

audiences = consumers and not citizens. Can there possibly be any sites of redemption within this refeudalised public sphere?

5. Conclusion

Can content diversity sprout from competition? Noting that the potential for competition is not equal to competition itself. Can we rely on markets to create media diversity?

In the current market-discourse the belief is that "competing content suppliers individually offer higher diversity as an economic good to outshine each other" (pg278 Fu.pdf).

Can we place the hope for diversity in the basket of community and public media? Would this be fair to our nation?

What about the remit of the MDDA? More media, more platforms, more types? Is this really in the national interest?

Regulating Diversity

In most respects, the focus of regulations have largely been on broadcasting. In the print media, by far the largest sector in the media environment, the discourse of pluralism and diversity is around ownership.

Types of regulation to ensure media diversity:

A) three tiers of broadcasting
- public,private and community media;
- This has been articulated very well over the years;
- See on dvd: Afrimap.pdf (pg43); Amarc.pdf (pg15; 17); Thorne.pdf (pg34)

B) regulating media ownership (cross media; anti-trust; anti-monopolies)
- South Africa has legislation on:
    - cross-media ownership [between broadcasting and print; daily print and local print and; within region or locality]
    - generally-applied competition law; [not sure if this covers anti-trust and anti-monopoly laws]
    - any more …
- precedents; there's enough legislation and regulations around the world (and I will reference some below) but by far the most enforceable and menacing are those imposed by the World Trade Organisation and its facilitated declarations:
    - which is why I reference this first, LA TIMES.doc;
    - variations around the world: Berger.doc (pg1 – as recorded in 1997);
- variously in Europe and America, there is legislation and/or regulations establishing market-ownership ceilings around -
    - the projected audience reach in a specified area (geographic or demographic); Amarc.pdf (pg14); Mcewen.doc (pg11)
    - the projected or established revenue of media titles in a specific area;

the market-share of media titles (geographic; sectoral or cross-sectoral); Mcewen.doc (pg4; 5; 8)
- ownership of any media across sectors: Wikipedia.doc (pg11), Mcewen.doc (pg9-14)), Barnett.pdf (pg19; pg12-13); Djankov el al.pdf (pg16-17)
- individual owners' shares in media enterprises: Djankov et al.pdf (pg16), Mcewen.doc (pg13-14);
- foreign ownership of media;
- state-owned media (?);
- how it is measured: Mcewen.doc (pg15); Wikipedia.doc (pg3-4); Cooper.pdf (pg139-181);

C) Content regulation
- local content regulations in broadcasting
- restriction on foreign content in broadcasting and film (See regulations from France, Rinaman.doc & Bornon.doc)
- public service quotas

Rethinking Media Pluralism

(This section is largely a synthesis of <u>Kari Karppinen (2010), Rethinking Media Pluralism – A Critique of Theories and Policy Discourses, University of Helsinki</u>. Karppinen.pdf. The number references are the page numbers in this document)

The underlying rationale for regulating media ownership generally lies in the fear that concentration may limit the number of voices that have access to the media. It rests on the assumption that free market entry and effective competition (amongst media and between different media structures) are naturally the best guarantees of pluralism. (100) This is also the discourse of the MDDA.

Even in the community media sector, whose members are generally under no illusion about commercial media's ability to serve the information needs of all citizens, the discourse of competition rears its head in talk around sustainability (re: not being able to compete effectively due to commercial media practices or dominance; or requiring subsidies in order to compete effectively in the market).

However, despite the assumption in media policy-making circles that media pluralism is related to competitive markets, the exact nature of the relationship between market competition/concentration and media content is contested. Studies on media ownership concentration and content are either merely sketchy and descriptive (i.e. providing a count of language or cultural representation) or have failed to empirically show a causal link between content and ownership. (101)

So for example – empirical evidence in South Africa is that print media is overwhelmingly white-owned. But dare you accuse the media of containing or reflecting only white people's opinions, values and discourse. Another scenario could be if a study finds that a particular linguistic group (say for e.g. isiVenda) is unrepresented in print media and Media24 or Caxton decide to add in isiVenda supplements in their titles in those areas. Diversity addressed notwithstanding concentration?

Another dilemma when diversity and pluralism is coupled to descriptive counts of content, is the clearly limiting remit to public and community service media to be responsible for content that is not profitable or not taken care of by the market.

On the question of ownership, those in position of power in the media obviously downplay this in general, arguing that the real power belongs either to individual journalists, the market at large, or consumers (see also, Berger.doc pg4, point 3(11)). Still others argue that the root problem is market competition and commercialization. After all, even if they are not part of chains or large conglomerates, all media are increasingly guided by the same commercial logic that relies on the standardization of contents and formats. (101)

Hence, **does ownership matter at all?** When cognisance is taken of power structure in society, it certainly doesn't (recall, the questions posed at the end of section 2 of this paper).

The point is, it is entirely possible that competitive markets enhance the number and variety of programme types and genres available to the public, but at the same time narrow the range of political views or even exclude some contentious issues altogether (102). An inherent contradiction of communicative power is the simple fact that some social actors are always better placed than others, both materially and culturally, to express their views and participate in public life through the media (72). Hence, the metaphor of the "market place of ideas" implies that the marketplace itself provides a natural and neutral logic for the operation of the media, but ignores the ways in which the market itself acts as a form of censorship that privileges some voices and excludes others (17).

The liberal panacea in response to these inherent and/or inevitable contradictions of communicative power are the professional standards of balance and objectivity they proclaim and, the notion of the "economic good" of competition dictating high standards of content (73). The latter notion subsists in the realm of "individual consumer choice" - i.e. the "freedom" to tune in or tune out. The rhetoric of "free choice" has even been adopted in part by some advocates of public service media as they re-frame their arguments in terms of consumer satisfaction rather than public interest and social benefits (76).

In light of this, the more realistic and practical question for media activists to pose is – if the battles and polemics around media diversity is about, among others, guaranteeing pluralism of opinions and ideas – **can we ever have pluralism of opinions and ideas?** The idealisation of free choice in the polemics of media pluralism would like us to believe it is possible, but honestly, it is not.

As we thus grapple with the concepts of pluralism and diversity at this point in time in South Africa – and given the evidenced trajectory of the commercial media market – we have to understand these terms within the context of the power relations between different social actors, and not in terms of multiplicity and variety as such (71). It rests on the problem of unequal cultural and economic power that arise from the cultural forms produced by a minority for large, dispersed audiences (72).

Hence, while the media may speak truth to power, power also rests within the media. The media are not only powerful social actors in their own right, but are also gatekeepers on which other powerful social actors depend to a lesser or greater extent. Even when guided by norms of balance or objectivity, all media institutions act selectively as filters of topics and voices, which endows them with the power to define problems, set agendas and mark the limits of legitimate public discussion. Furthermore, as the media are never completely independent from other powerful influences, such as pressures from government, interest groups and media owners, that power will always be strategically used to influence the agendas and framing of public issues (73).

The comfortable bubble of media pluralism and diversity as something linear, calculable and indeed achievable on the barges of multiplicity and variety, needs to be burst. No doubt multiplicity and variety reels in choices, but it remains unclear whether greater choice actually gives consumers greater control over the type of products (or media contents) that are made available, and indeed whether greater choice is something to be valued in the first place (77). In this sense, media pluralism cannot be about the idealization of free choice, unrestricted communication or the illusion of balanced representation through regulated pluralism, but rather a dynamic contestation and levelling of the unequal distribution of power in society (204).

In centralizing the notion of power relations and the inherent contradictions of communicative power in the debate on media pluralism and diversity, we have to admit that these are essentially political and ideological questions that imply a dialogue between different values and different conceptions of democracy (203). Moreover, for this conception of media pluralism to be compatible with the struggle against inequality [as well as the struggle for environmental sustainability] we will have to acknowledge that there are limits to pluralism, and that drawing those limits will always entail political choices (68).

When it comes to media policy, this would then be best conceptualized as a shift from one mode of regulation and one form of power structure to another, and not as a dichotomy between freedom and constraint, as the discourse of liberalization or deregulation would have us believe (77-78).

Despite the rhetorical appeal of deregulation and free markets, it is useful to think of all media as regulated in one way or another. Stuart Hall argues that there are at least two reasons to resist the articulation of markets with freedom. First, markets do not operate on their own. Contrary to the language of the free marketplace of ideas where the market is seen as a self-regulating and spontaneous mediator, the market is a politically designed institution, not a homogenous, unstructured and unregulated natural entity that emerges spontaneously from civic society. The "liberalization" of the market has therefore often meant a re-regulation and proliferation of rules and regulatory cultures that aim to safeguard the "freedom" of the market. Secondly, and more importantly, the market itself regulates. It allocates resources, rewards certain modes of action, and creates winners and losers. In effect, the market creates incentives that induce certain forms of conduct and discourage others. Any market imposes its own criteria of pre-selection and censorship. In other words, all markets necessarily limit the range of public choices, yet all of them have a tendency to present this process of pre-selection as neutral or natural, while in truth their criteria are inevitably political, in the broad sense of the word (77).

And finally, Zygmunt Bauman explains that throughout modernity, the principal tool of "setting the agenda for choice" or pre-selection has been legislation. The fact that political institutions are now increasingly abandoning this tool does not necessarily mean that freedom of choice is expanding, but that the power of pre-selection is being ceded to other than political institutions, above all to the markets themselves. Consequently, the code or criteria of pre-selection are changing, and among the values towards which choosers are trained to orient their choices – short-term pleasure, hedonism, entertainment and other market-generated needs come to occupy a superior place. According to Bauman, the late-modern emphasis on freedom of choice and individual autonomy has not really increased individual freedom, but led instead to "unfreedom", to the transformation of a political citizen into a consumer of market goods (77).

Media pluralism thus shouldn't be seen as a measurable linear variable, or a concrete state of affairs, but as a critical orientation that can provide new alternatives and new forces of pluralization. At this point in time, it should be occupied with the questions of **how to reclaim the citizens' freedom and de-feudalize the public sphere.**

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6. Overall observations and recommendations

1. The information on media diversity and pluralism in our media sector is available and accessible in all the different ways, methodologies and formulas.
2. The need to advance, expand and empower the public and community media sectors, remains crucial.
3. However, it will be a great disservice to the nation for these sectors to see their struggle as unique and distinctive and requiring myopic attention (i.e. we do our thing to get stronger and serve the community as far as possible, and well, the other media are just our neighbours in this environment and have to do their thing).
4. Community media activists need a more encompassing agenda, over and above their own wellbeing, and which involves a contestation of the private media status quo because of the dislocation of power which arises from this.
5. We need to be increasingly open to the idea of regulating the media, and get down to the drawing board to develop more and unambiguous regulations.
6. The MDDA discourse and remit needs to be seriously reviewed to incorporate the "critical orientation" of media diversity as opposed to the linear / measurable construct of diversity.