

Global Media Journal

German Edition

Vol. 4, No.2, Autumn/Winter 2014

URN:nbn:de:gbv:547-201400801

From the Field: Windows of Opportunity – The Transformation of State Media to Public Service Media in Kyrgyzstan, Mongolia, Moldova and Serbia

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Abstract: The transformation of state media to public service media (PSM) is one of the most ambitious endeavors in the field of media development. Not many efforts to free the national media from government control have succeeded in the past decades. In this paper the comparatively promising cases of Kyrgyzstan, Mongolia, Moldova and Serbia are discussed. The PSM in these countries all have a new legal basis, including a public service remit and a relatively independent governing body in which civil society is represented. The services delivered to the public by these media are analyzed according to a number of societal functions which are assembled under two general headings: “creating a public sphere” and “supporting integration”. Based on this analysis, a differentiation between “PSM in initial transformation” and “PSM in advanced transformation” is suggested. In all cases studied, different actors successfully used windows of opportunity: general political agendas to reform the media, a specific engagement from the management as well as support from the population and civil society. Media development actors here helped to advance the processes of change in different ways. Recommendations for future media development include strategic planning, inclusion of local actors, the pooling of legal expertise as well as structured processes of organizational development and capacity building.

Keywords: public service media, public service broadcasting, transformation, media development, Kyrgyzstan, Mongolia, Moldova, Serbia

Introduction

One of the most ambitious endeavors in the field of media development over the past two decades has been the transformation of state media to public service media (PSM).¹ It is a challenge to work with state media that are controlled by the government and effectively act as its mouthpiece, and to support them on their way to

¹ In this paper we shall speak of public service media (PSM) instead of public service broadcasting (PSB) in order to include both the broadcasting media and interactive internet media.

becoming independent media, working on the public's behalf. In order to succeed, a change in paradigm within the media organization is required towards a public service remit – a concept that is often not established in the respective countries either. After all, the concept of PSM, for which the British Broadcasting Corporation (BBC) is often cited as a model or even “prototype”, is deeply rooted in the history and political discourse of Western Europe only (Woldt 2005: 293).

Since the 1990s, an increasing number of efforts have been made to transform state media, in different regions of the world. The hope was that in the wake of major changes in political systems it would be feasible to reinforce such fundamental reforms in the media sector (Jakubowicz 2005, 2007; UNDP 2004; Stiles & Weeks 2006; Bussiek 2013). But not all the ambitions and dreams could be realized. The initiatives and programs that were introduced were idealistic but largely unsuccessful. Hrvatin (2002: 83-84) sees many post-communist formerly state-owned media in Central and Eastern Europe in a state of crisis. The problems “range from haphazard media legislation, political pressures, financial and organizational difficulties, and management crisis to identity crisis and loss of public support”. Jakubowicz (2005, 2007) sees a lack of social embedding of the idea of PSM. He argues that state-owned media would have required long-term help from international media aid for the transformation into public media. Several other authors (see UNDP 2004; Stiles & Weeks 2006; Wakili 2013: 257; Bussiek 2013) also question whether such an extraordinary commitment was ever provided by the international actors.

This paper aims to show that the picture is not completely bleak. We discuss four cases of former state media where the intended transformation processes can in some regards be called successful. Based on a broad search for positive cases in developing countries and emerging economies we have chosen to analyze the development of PSM in Kyrgyzstan, Mongolia, Moldova and Serbia. In doing so, we do not attempt to lessen the critique cited above. Our aim is simply to provide additional insight and use the few positive cases to expand the debate and the practice of media development.

To achieve this, we first need to clarify what can possibly be expected of former state media and what can be achieved through media development. We therefore discuss a theoretical concept of PSM and their functions in society which allows for a broad analysis of the different services a media outlet may offer to the public. We also introduce a strategic model for media development which enables us to better understand the different interventions carried out. In the empirical part of this paper we assess, in the form of case studies, the status of the four PSM and the development they have undergone in the past years. We analyze and compare the functions they deliver to their public. And we assess the supporting work done by the media development actors as part of these change processes. Finally, based on these findings we make some recommendations.

Functions of Public Service Media

The range of Public Service Media (PSM) worldwide is varied and complex. There is no standard definition. Nevertheless, numerous attempts have been made in the academic world as well as in the media policy debate to define the core of PSM or, to use the older term, Public Service Broadcasting (PSB) and to describe their characteristics (see Taussig 2006: 62). Generally the different models were developed as an alternative to the models of state-controlled and profit-oriented commercial media (UNESCO 2005: 13). But the terms PSB and PSM are perceived differently in different languages and cultures: 'Public' may be perceived as 'national', 'state' or even 'governmental' in many parts of the world. So often this linguistic difficulty is a first obstacle to an understanding of the concept (see Rumphorst 1998). And authoritarian regimes tend to only label their state media as public service media.

UNESCO and the World Radio and Television Council emphasize four principles of PSM: universality, diversity, independence and distinctiveness (UNESCO / WRTC 2001). In practice most PSM have a threefold *mission* (or mandate): to inform, to educate and to entertain. The scholarly literature gives both content-oriented approaches (Blumler 1993: 405-407) and organizational/management approaches (Kiefer 1996: 9; Siune & Hultén 1998: 24-25). The primary focus here is on the structure of the media organizations and on the quality of their output.

Nissen (2006: 22) instead develops an audience-oriented approach and puts the individual citizen at the centre of his considerations, demanding that identities and citizenship should be strengthened through PSM. In doing so he emphasizes the cohesive role of PSM for society. He speaks of PSM as a cultural, social and political "glue". Ideally, this glue nourishes civic aspects, such as citizenship, empowerment of minorities and the disadvantaged, cultural expression and common values, and it promotes innovation.

According to Woldt (2005: 301), the integration of society through the media may differ from country to country and yet he suggests that there may be some basic elements or principles that are universal. He stresses that PSM have – despite all differences in the details – an outstanding "social function". Wakili (2013) speaks of a specific "integrative function" of PSM in the case of nations which are faced with the challenge of integrating different ethnic and/or religious groups.

For this paper we therefore consider overarching social functions of PSM. These can, according to Burkhart (2002), be identified on three different levels: on the social level (e.g. entertainment, orientation), the political level (e.g. critique and participation) and the economic level (e.g. advertising, market information). We choose to focus on two key functions here because they are crucial for a society (Donges & Meier 2001): We define as overarching "general functions" of the media:

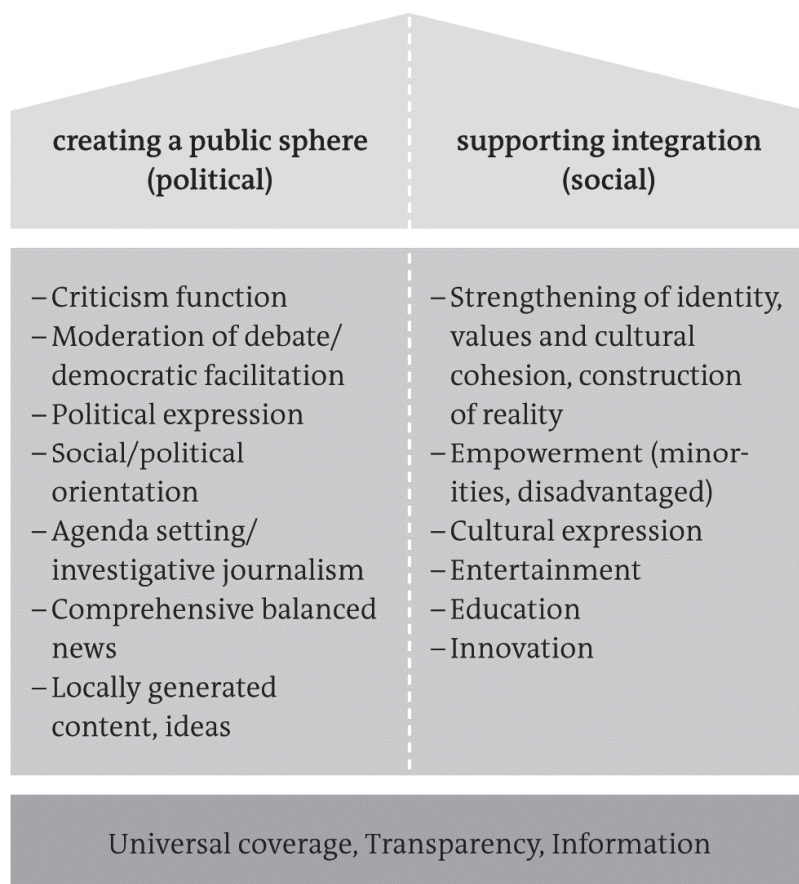
1. *Creating a public sphere* as a function on the political level, and
2. *Supporting integration* as a function on the social level.

1. *Creating a public sphere* is one of the main functions media need to fulfil in pluralistic societies that are based on democratic principles. A public sphere is supposed to be the breeding ground for political expression, for criticism and democratic facilitation. It provides social and political orientation as well as space for investigative journalism and comprehensive, balanced news. An important factor here is that programs should be generated locally within the country, so that the public sphere can in fact become a sphere for the people. And besides the classic media, the new media open up additional spaces within the public sphere and enable new forms of participation.

2. The second general function, *supporting integration*, is equally fundamental. A society needs to be held together by various cultural elements in order to build and sustain common identity, values and knowledge. Only based on this common ground can local, regional and national communities live together. And here, again, new digital media hold the potential to support these processes in new ways.

We choose to treat these two general functions in distinction although they are overlapping. Vlastic (2004) shows that there is a close link between the public sphere and integration. He provides a typology of five traditional models of integration through mass media: 1) supply of common topics, 2) enabling of representation, 3) creation (or constitution) of a (political) public sphere, 4) transmission of common norms and values, 5) construction of reality. In our approach we assemble the functions associated with journalism under the general function of *creating a public sphere* and the other functions that are related to social integration under the general function of *supporting integration*. (see figure 1). On top of these we find that there are three specific functions, which are fundamental to both general functions: universal coverage, transparency and information. We therefore place them at the bottom in figure 1.

Figure 1: Functions of public service media subdivided by two general functions: creating a public sphere and supporting integration



Media Development – The DW Akademie Model

In order to specify development policy and country strategies, Deutsche Welle Akademie (DW), in consultation with the German Ministry for Development (BMZ), has developed a strategic model for media development (see Figure 2) (DW Akademie 2014: 29). It serves as a guiding structure for the set-up of media development programs. Managers of DW Akademie use this model to plan and implement projects aimed at strengthening sustainable structures in the media sector. It is founded on a human rights approach towards media development.² The principal aim here is not to strengthen the media sector for its own sake but to foster a basic human right as described in Article 19 of the Universal Declaration of Human Rights and the UN International Covenant on Civil and Political Rights (ICCPR): the right to freedom of opinion and expression and access to information and ideas. People in developing countries are to be supported in recognizing their choices, expressing publicly and in dialogue with their governments their hopes, needs and demands, and in successfully

² The guiding principles of this approach are participation and empowerment, non-discrimination and equal opportunities, transparency and accountability.

enforcing these rights. At the same time, government stakeholders should be encouraged to fulfil their role as guarantors of these rights, i.e. to respect, protect and advance the elements of Article 19.

Figure 2: Four key areas of the strategic model by DW Akademie



Article 19 forms the centrepiece in the strategic model (see Figure 2). Around it four areas of strategic action are placed: *Political and legal framework*, *qualifications*, *professionalism and economic sustainability of the media sector*, and *social participation*. Around these areas a ring is placed: “digital change”. This stands for the fact that in all four strategic areas new developments related to digital technologies need to be taken into account.

This model can now be applied to projects around PSM and their transformation. The bottom area in the model “Professionalism and economic sustainability of the media sector” is where the functional elements related to content and organization can be placed. Many projects try to improve the organizational structure and economic model of the media as well as the content it provides. But the other areas also need to be considered: The political and legal framework for public service media is of course of particular importance and needs special attention. Equally the question of capacity building of media experts within the public broadcasting system but also in

journalism schools and universities should not be neglected. Another key area is the role civil society plays in participating in the different programs as interviewees, protagonists and participants in discussion – but also as actors in observing, steering and advancing public media as such. All the elements mentioned above are assembled in table 1. In our case studies they are assessed for each of the selected media outlets.

Table 1: Public Service Media System

Key areas in the DW Akademie model	Media Development towards a Public Service Media System
Political and legal framework	<ul style="list-style-type: none"> • Media laws • The application of these laws in daily practice • Bodies controlling the media outlet • Ethics codices, newsroom guidelines set up by the outlet
Capacity building	<ul style="list-style-type: none"> • Journalism education, offered to the staff of the media outlet • General structures for capacity building
Professionalism and economic sustainability of the media sector	<ul style="list-style-type: none"> • Sources of revenue of the media outlet • Payment of staff • Organization of the outlet, newsroom structure (including regional offices) • Technological situation of the outlet, coverage (including service in rural areas) • Human resources management • Professional self-concept of journalists
Social participation	<ul style="list-style-type: none"> • Civil society organisations engaged in a public service ethos, and PSM • Participation, voice, empowerment (minorities, disadvantaged)
Change in the digital age	<ul style="list-style-type: none"> • Innovation (technical as well as content-related)

The two theoretical approaches – the general functions of PSM and the strategic model – serve as a guiding structure for our case studies. They allow us, in a first step, to assess both the structures of the PSM in their national media landscape and also the functions they deliver to the public. And then, in a second step, we can study what change in former state broadcasters could be achieved through media development.

Methods

The four case studies assembled in this paper are part of a broader research project conducted by DW Akademie in the course of which a total of twelve state media

outlets, PSM, private and community media are studied (Lublinski, Wakili & Berner 2014). All cases were selected based on a literature review and initial interviews with development and media experts. The four cases assembled for this paper had originally been suggested by experts from various major media development institutions (BBC Media Action, DW Akademie, International Media Support and Internews) as potentially promising practices.

Each case study is based on seven to nine guided interviews with people that were involved with the PSM in question as well as experts observing the developments in the media sectors of the country in question: employees of the media, civil society representatives, media experts and people involved in media development and consultancy.³ A guide for the interviews was used by all interviewers. According to the experience and expertise of the interviewees they were allowed to lay special emphasis in selected areas. In addition, documents related to the PSM in question were collected and analyzed later.

The authors of this paper are experts in media development but they were not involved in the media development projects in question during this research project. They had occasion to visit the media outlets for observation. Based on this overall broad research the authors deliver an appraisal of the different public service functions the media outlet in question may fulfill. So instead of actually measuring the media functions, which would be a major research effort even for only one media outlet, the authors here document their understanding of the situation. It goes without saying that these insights and judgments are preliminary and that the issues in question are subject to change. But they do yield valuable and complementary information on the media in question and the change processes. This approach is also incomplete in that the information given on the audiences is rather limited: we rely on the expert judgments from our interviews, some project documents and the expert-based surveys conducted by IREX (2013, 2014), but not on audience research as such. Therefore no analysis of the media consumption or media acceptance can be made in this paper. Also no assessment of the professional self-concept of journalists (and its changes) is possible here.

It should also be mentioned that the approach and perspective of this paper stems from global media development practice. The four cases discussed here are from South East Europe and Central Asia because they have a lot in common as far as the media in question and the media development initiatives are concerned. At the same time an effort was made to take the different cultures and contexts into account by treating every case individually before comparing across different countries and interventions.

We will begin the empirical part by summarizing findings on the situation of the four media outlets and the changes they have undergone in the past years. More details on these cases and further literature and sources used can be found in the full documentation of this project (Lublinski, Waliki & Berner 2014).

³ For a list of interviewees and documents used see: Lublinski, Wakili & Berner 2014.

Case Study Kyrgyzstan: OTRK

Kyrgyzstan is the only country in Central Asia whose main former state broadcaster (OTRK) has had its status changed to that of public service media, formally finalized in 2010. OTRK consists of three TV channels (main channel, children's channel and music channel), all broadcasting in Kyrgyz and Russian. A fourth channel for cultural content is still in the planning phase. OTRK radio runs five stations; the online only Radio Dostuk (Friendship Radio) provides content in six minority languages, though produced by non-professionals, and aims to increase the number of languages to ten. However, Uzbek language programming does not exist within the Kyrgyz PSM-system although Uzbeks make up around 14 percent of the population as a whole, rising to 40 percent in the southern regions. Thus, Kyrgyz PSM are neglecting a very important part of the integrative function, all the more important since the ethnic strife of June 2010.

The April 2010 Decree of the Provisional Government of the Kyrgyz Republic "On Creating a Public Broadcasting Service in the Kyrgyz Republic" assigned public broadcaster status to the Public Broadcasting Corporation of the Kyrgyz Republic and established a new Supervisory Board, which monitors the transformation to PSM. Its members are selected by a parliamentary Committee for Education, Science, Culture and Sport.

A fully reformed media law has yet to be formulated. The Media Act of 1992 is generally agreed to be relatively liberal but outdated and a working group is currently formulating a new Media Act. This is proving difficult, though, due to conflicting interests of parliamentarians within the working group. Consequently, while access to information is well-legislated, there is still a lack of specific spelling-out of a remit for PSM in Kyrgyzstan.

Like the other two public radio and TV outlets, ElTR and Yntymak, OTRK is also subject to the regulation of the abovementioned Supervisory Board. This governing body, whose 15 members include five members from government, five from parliament and five from the civil society, is widely seen as one of the success stories of transformation in Kyrgyzstan and as such, attempts to politically undermine it rarely get far.

OTRK is financed primarily by the state, via a budget which is still under the control of the Ministry of Finance. This is the primary reason why many observers and some OTRK employees regard the broadcaster's claims to independence with scepticism. Apart from funding through the state budget, there is also some revenue from advertising and funding from international donors and development partners, though the advertising industry in Kyrgyzstan is weak. However, thanks to the input of experts (provided by Internews and others) OTRK is now in a better position to negotiate its case with the ministries and work towards more autonomy in the budget planning.

OTRK's program quality, particularly of news, is mostly described as relatively poor. The news is sometimes biased and not current enough (see also IREX 2014). On the other hand OTRK broadcasts a bulletin style news program produced by the independent Kyrgyz Kloop Media, and it rebroadcasts BBC World News on a daily basis. Despite the existence of regional studios as well as a mobile studio, there is a lack of regional content and regional facilities are only used when members of the government or other important persons visit. Overall, however, there have been some relevant achievements within the transformation process. This has been mainly supported by the US American media development organization Internews, whose strategy has focused on management, organizational and financial assessments, lobbying work in the political sphere and recently also audience research. Among the positive developments is the creation of an in-house journalism center; up until now capacity building was largely left in the hands of donors. Further, the use of mobile and internet communication has increased: OTRK has a website presence with live streaming and also runs a Facebook page and Twitter account. Moreover, OTRK's response to the needs revealed through audience research has been rapid: a lot of programming has been changed, which has resulted in rising ratings.

Case Study Mongolia: MNB

The media landscape of Mongolia, one of the largest and at the same time least densely populated countries in the world, is characterized by large disparities between the capital Ulan Bator and the rural provinces. With the adoption of the new Law on Public Radio and Television in 2005, the former National Public Television and National Public Radio, which used to be state-run and mouthpieces of the Soviet system, were formally transformed into the public service broadcaster Mongolian National Broadcaster (MNB). MNB consists of two nationwide TV channels and four radio channels. In 2011, MNB television's second national channel was established, which broadcasts in minority languages. MNB radio also has a nationwide channel for minorities as well as a youth-oriented and overseas station. Despite MNB's diverse programming, the focus on the capital remains high. MNB only has a few correspondents in the countryside and there are not enough regional programs about the issues of the rural population.

The legal framework for MNB is generally evaluated positively; the Law on Public Radio and Television assigns MNB a clear public service remit. It stipulates that the broadcaster is a non-profit legal entity, which "serves only for public interests, holds responsibility before them, and carries out its operation under the public control". However, experts argue that amendments are needed with regard to the regulations on financing, advertising and the nomination of members of the National Council (NC), MNB's governing body. Its lack of independence and transparency with regard to the nomination process are among the biggest challenges that MNB faces. Although the law prohibits nominating politicians and other officials, the influence of politics within the NC is obvious.

Another problem for MNB is its financing; officially, the broadcaster has three main sources of funding: direct government subsidies, license fees and advertising or sponsorship. In reality, MNB is heavily dependent on direct state subsidies, because due to the small Mongolian population and the fact that a high percentage still live a nomadic lifestyle, the income through license fees is too low. Further, commercial advertising is completely forbidden by the law, which results in MNB's dependence on paid-for programs.

Although MNB has an online presence and broadcasts – its youth programming, for example – via the internet as well, the broadcaster is not known for being innovative. Digitalization was planned for 2014, but neither a realistic strategy nor financial security exist. Young viewers in particular perceive the broadcaster's programming as rather old-fashioned.⁴

In general the quality of the news is not perceived as very high, not only because of paid-for news items but also due to a general lack of professional skills. Most programming is focused on the capital, very little regional information is given.

In nine years of transformation, MNB has nevertheless made significant achievements. A decisive factor for this was the continuous and long-term collaboration with Radio Sweden and SIDA, which concentrated on capacity building. Today, numerous MNB journalists have reached a basic level of professionalism, though further knowledge especially at the management level is needed. Moreover, MNB does not have proper newsroom guidelines or an ethics code yet. Overall, despite the remaining problems, MNB has a good reputation among Mongolian citizens and is still the broadcaster with the best ratings (Press Institute 2013a).

Case Study Moldova: TRM

In terms of language, Moldova's media landscape is as divided as the country as a whole. The media report in Romanian and in Russian, often content is even produced in Romania or Russia – a fact that hinders the media in fulfilling their functions of creating a national public sphere and supporting social integration. After having served as a propaganda instrument of the ruling Communist party for years, Teleradio-Moldova (TRM) was legally turned into a 'national public institute' in 2004. However, it only entered into an actual transformation process towards public service broadcaster when a pro-European coalition came to power in 2009. Today, TRM consists of one nationwide TV channel, three radio channels (news, youth and music) and its news website.

The legal framework for TRM is set by the Broadcasting Code of the Republic of Moldova (BCC), which was adopted in 2006. The law is generally evaluated positively

⁴ This information is based on interviews with experts inside and outside MNB. See also Press Institute 2013b.

by the different experts interviewed (see also IREX 2010: 175). It assigns TRM with a clear public service remit. The BCC defines TRM as a public company with an independent editorial board that is “to assure the right of information of all categories of citizens of the Republic of Moldova, including national minorities”. Controversial aspects of the law are the financing of TRM and the political selection process for the Council of Observers (CO), TRM’s highest governing body. Although in theory the CO should consist of 9 members, chosen from civil society with professional qualifications in different domains, in reality party politics have a large influence on the body. The fact that its members are selected by Parliament results in a persistent likelihood that political affiliations play a role in their election.

Although the law stipulates that “Parliament guarantees that financing is secure and corresponds to the needs of the activities of the company”, financing remains a difficult question for TRM. The broadcaster is funded by the state budget, sponsoring and advertising. In reality, it has always lacked sufficient funding. Further, the fact that TRM’s funding is assigned on an annual basis from the state budget makes the broadcaster prone to political influence in various regards. However, at present experts do not believe that political influence has been exerted through the financing of the company so far.

Overall, TRM has managed to fulfil some of its public service functions through organizational reform – a process supported by DW Akademie over many years. The reform process has been open to civil society and various media NGOs assumed a critical and constructive role in it. The content of TRM’s news and current affairs programs has become much more balanced and independent. Regional structures within the broadcaster exist and reporting from rural areas is ensured. Part of the reform process was further the creation of an online presence; today, TRM’s website offers a mobile version as well as podcasts. The broadcaster also offers its content via Facebook and Twitter. The management is planning the installation of a training center within TRM. To date, employees are mainly trained by agents outside the company, mostly donors. Within TRM ethics codices exist and comply with international standards. The case of TRM shows that media development can assist in assuring some basic information services to the public - through processes of organizational reform.

Case Study Serbia: RTS

With more than 1000 media outlets, Serbia has one of the highest per-capita media saturations in Europe. The country’s public service media sector consists of the national public broadcaster Radio Television of Serbia (RTS) and RTV, which is the public broadcaster of the Serbian province of Vojvodina. RTS, which was the propaganda instrument of the authoritarian Milošević regime – and even a declared military target during the NATO bombings in 1999 – had formally transformed into a public service broadcaster in 2006. Today, the national media network consists of three nationwide TV channels (main channel; educational and cultural channel; and

RTS Digital), four national radio channels and its website.

RTS is regulated by the Broadcasting Law, which was adopted in 2002. However, since this law is outdated and does not provide sufficient cover, three new laws for the regulation of the Serbian media landscape are being drafted and it is expected they will be adopted in late summer 2014: the Law on Public Information, the Law on Electronic Media and the Law on Public Service Broadcasting. The current Broadcasting Law stipulates that RTS's programs should be free from political and economic influences and provide content for all parts of society. The new Law on Public Service Broadcasting will also include provisions for a clear public service remit. RTS's regulatory body is the Republic Broadcasting Agency (RRA), which appoints the broadcaster's board of directors, its governing body. Although there are specific criteria both for RRA's council and RTS's governing body (e.g., they have to be experts and must not be politicians), the criteria are often not taken seriously, so that in practice the members are no real experts. However, irregularities regarding the nomination process are not common.

Officially, RTS has two main sources of funding: License fees and advertising. However, since the percentage of households paying the fee has significantly decreased in the last few years (to 25%), RTS received 50 million Euros from the state budget in 2014. This dependence on state financing makes RTS vulnerable to political pressure. In the context of the drafting of the new media laws a new financing model for RTS has been developed, which will hopefully guarantee the broadcaster's sustainability through license fees and advertising. The regional offices, like the broadcaster in general, are overstuffed. Nevertheless, despite the existence of over 30 correspondent offices in all regions and major cities, the media coverage focuses on the capital Belgrade and too few reports address the concerns of the rural population.

Overall, the case of RTS shows that a successful transformation from a former state media outlet to a public service broadcaster is possible. Today, RTS fulfills the main public service functions, i.e. it offers balanced and objective news, ensures participation, gives Serbian citizens a voice, moderates the public debate and offers social orientation and criticism. Moreover, it no longer suffers from strong political pressure. The British media development organization BBC Media Action in particular supported this process, concentrating on a systematic strategy of capacity building at all levels. As a result, the majority of RTS's employees are equipped with a good level of professionalism, though no ethics codes or newsroom guidelines exist. Further, RTS has a generally good reputation among citizens; its news program *Dnevnik* has the highest ratings and RTS enjoys high credibility within the Serbian population.⁵

⁵ Television Audience Measurement by the Nielsen Company for 2013, document provided by Jovanka Matic. Additional document on ratings for 2014 provided by Djordje Vlajic. The judgement on the credibility of RTS is based on our expert interviews.

Table 2: General Function „creating a public sphere“ in comparison.

Function	Kyrgyzstan – OTRK	Mongolia – MNB	Moldova – TRM	Serbia – RTS
<i>Information: comprehensive, balanced, objective – and also regional news.</i>	<p>Rating: o Level of program-making in general is relatively poor: News items are repeated without checking sources, hearsay often replaces sound research. Very little coverage of regional developments, rural audiences and ethnic minorities are largely ignored. Bulletin style news programme by the independent Kloop Media. Daily rebroadcast of 10 mins. of BBC (world) news in English.</p>	<p>Rating: o MNB is the broadcaster with the most extensive coverage. Its programming is more diverse and professional than private TV channels. However, on average the quality of news is not very high – not only because of paid-for news items but also due to a general lack of professional skills. Most programming is focused on Ulan Bator, very little regional information.</p>	<p>Rating: + Information is presented overall in a balanced and impartial way.</p>	<p>Rating: + The quality of RTS’s news has significantly improved; today, the broadcaster provides generally balanced and objective news. However, a slight pro-government tendency is sometimes criticized. The coverage focuses on Belgrade despite numerous regional offices.</p>
<i>All political parties have the opportunity to speak in the program and are present in interviews, sound bites, etc.</i>	<p>Rating: o There is a slot from parliament, some parliamentary debates are broadcast live; once a week. OTRK also rebroadcasts <i>Inconvenient Questions</i>, a highly popular political talkshow from Radio Azattyk (Kyrgyz service of Radio Free Europe/Radio Liberty)</p>	<p>Rating: + Though the voices of the ruling party dominate in the news, all political parties are given a say. But journalists interview predominantly government representatives.</p>	<p>Rating: o In parliamentary debates all parties are present in sound-bites. However, government policies are explained without the critical voice of the opposition. The same applies to talk shows.</p>	<p>Rating: + In RTS’s news programs as well as in political talk shows, all political parties have the opportunity to speak.</p>

<i>Criticism of political actors (government, administration, other political actors)</i>	Rating: - The balanced and objective representation of the entire political spectrum is laid down in the constitution – but not often put into practice. Bad journalistic habits are still too ingrained, and self-censorship is often automatic.	Rating: - Criticism of opposition party only, no criticism of the ruling party and government.	Rating: o Criticism of political actors takes place without barriers in talk-shows and in parliamentary debates. However, TRM rarely puts critical topics on the national agenda.	Rating: o Although there is public criticism of political actors, the journalists are careful when they criticize the government.
<i>Societal criticism (social actors, individuals, problems in society)</i>	Rating: o Self-censorship means that journalists will stay away from topics that might be uncomfortable for daily politics to deal with. Radio Azattyk's <i>Inconvenient Questions</i> may be the only program that doesn't shy away from tackling touchy subjects.	Rating: o Problems in society are criticized very cautiously and quite generally.	Rating: o See above.	Rating: + Generally, criticism of social actors is possible and social problems are reported on. However, RTS tends to cover topics mainly when a scandal or crisis exists and lacks follow-up and background coverage.
<i>Moderation of debate/ democratic facilitation</i>	Rating: o Coverage of parliament; Radio Azattyk's <i>Inconvenient Questions</i> – debate is a form still very much in its infancy in radio and TV	Rating: + In general MNB offers a wide range of programs that try to enhance public debate on various issues.	Rating: + TRM's talk shows create a public sphere that fosters debate. They offer discussions between politicians, experts with questions from the audience.	Rating: + RTS with its news and information programs moderates the public debate. Political talk shows are given considerable importance.

<i>Social/political orientation</i>	Rating: o OTRK's relationships with audiences have been improving thanks to recent focus group research: audience feedback is being taken on board, it is likely that this will result in more programs on social/political issues being provided.	Rating: o MNB offers a wide range of programs that help citizens gain an overall understanding of the issue or situation, even though some of these programs are somewhat biased.	Rating: + TRM's talk-shows pick up important social and political topics and offer orientation. The same applies to its news programs.	Rating: + RTS offers a range of programs that help citizens gain an overall understanding of political and social issues.
<i>Agenda-setting/ investigative journalism</i>	Rating: - Investigative journalism is very weak in Kyrgyzstan. Agenda-setting at present is most likely to come from foreign news sources, although the Kyrgyz online news agencies are fairly on-the-ball.	Rating: - Overall, in Mongolia investigative journalism is underdeveloped. MNB publishes only very few investigative stories. However, since the broadcaster runs the most important news program it definitely has the potential to set the agenda of public topics.	Rating: - TRM limits itself to its informative function. It does not set the agenda proactively, nor does it engage in investigative journalism.	Rating: - Since RTS runs the most important news program it has the potential to set the agenda of public topics. However, investigative journalism is under-represented within RTS.

Table 2: General Function „creating a public sphere“ in comparison. Comparison of four Public Service Media (Kyrgyzstan: OTRK, Mongolia: MN, Moldova: TRM, Serbia: RTS) N.B. All the information given in the table above is based on the interviews, observations and document analysis made by the authors. It provides only very rough summaries of the findings. Many of the issues mentioned here are, of course, subject to change.

RATING: function fulfilled: “-“= No, “o”=partially, “+”=yes

Table 3: General function „supporting integration“ in comparison

Function	Kyrgyzstan – OTRK	Mongolia – MNB	Moldova – TRM	Serbia – RTS
<i>Participation, voice, empowerment, (e.g. programmes where the citizen can voice an opinion, programmes with the participation of minorities in their languages)</i>	Rating: o Social minorities and the disempowered (handicapped, LGBT groups, women) are completely underserved; ethnic minorities, particularly the Uzbek, continue to be sidelined; rural populations are occasionally heard, and get to air their issues when the mobile studio comes around, or if a VIP turns up on their doorstep.	Rating: o Both MNB television and MNB radio have a separate channel that broadcasts in minority languages. Further, there are programs for young audiences. However, there are too few regional programs that deal with the issues of the population outside the capital. Therefore, their participation and voice is limited.	Rating: + TRM offers programs for minorities, young audiences, rural population and families. Although the quality of some of these programs is rather poor, they still give a voice to those groups and empower them by giving information vital to them.	Rating: o RTS offers a few programs for minorities in minority languages, e.g., <i>Citizen</i> . Although it ensures participation and gives citizens a voice, the general focus lies more on political and institutional voices.
<i>Cultural expression, strengthening of identity, values and cultural cohesion (e.g. cultural programming including music, dance, coverage of traditional</i>	Rating: o There is increasing effort to include cultural and historic content. The inauguration of the new TV culture channel should hopefully improve the situation.	Rating: + MNB's programming puts a strong focus on the Mongolian culture and traditions. The function is fulfilled through a wide range of programs that convey traditional and modern knowledge and cultural practices to the public.	Rating: + A lot of Moldovan media content is produced either in Russia or in Romania. Therefore, TRM plays a vital role in strengthening cultural cohesion.	Rating: + RTS 2 and Radio Belgrade 2 in particular provide cultural programs that deal with values and traditions, among other things, and this helps strengthen the national identity.

<i>events but also modern culture, documentaries in minority languages)</i>				
<i>Entertainment</i>	Rating: + The majority of OTRK's programming is entertainment, whether sports, nature shows or films and the occasional soap.	Rating: + 10% of MNB's programming are entertainment shows and 27% movies and documentaries. However, critics say the entertainment shows often lack quality.	Rating: o TRM does offer entertainment but its programs often cannot compete with those of its commercial competitors.	Rating: + RTS provides domestic TV series, which are very popular with the general public; in this they differ from private channels, which mainly buy international entertainment programs.
<i>Education</i>	Rating: + The new children's channel, <i>Balastan</i> , prides itself on offering a balanced mix of entertainment and educational programming, 11.5 hours daily.	Rating: o MNB provides various specific educational programs. But their quality is questioned and programs for political education are missing.	Rating: o TRM does have some educational programs. Furthermore, it plans to set up a podcast service for children's radio.	Rating: + The second channels in particular provide specific educational programs.
<i>Innovation</i>	Rating: o <i>Balastan</i> is the first and only specialist children's channel in Kyrgyz television – the initiative is to be supported, quality could be improved.	Rating: - MNB has no reputation as an innovation driver on the Mongolian media scene. Generally, MNB is still perceived as	Rating: - TRM is not very innovative.	Rating: o RTS has digitalized various facilities and is still in the process of digitalization. Further, it runs a website and smartphone apps that provide content.

	OTRK gets audience feedback via internet, has improved its use of social media and is currently working towards the use of mobile applications.	traditionalist and rather old-fashioned.		
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Table 3: General function „supporting integration“. Comparison of four Public Service Media (Kyrgyzstan: OTRK, Mongolia: MN, Moldova: TRM, Serbia: RTS) N.B. All the information given in the table above is based on the interviews, observations and document analysis made by the authors. It provides only very rough summaries of the findings. Many of the issues mentioned here are, of course, subject to change.

RATING: function fulfilled: “-“= No, “o”=partially, “+”=yes

PSM in transformation: Creating public spheres and supporting integration

In the following we compare and discuss different public service functions provided by the four PSM. A rough overview of the status of the different functions according to our theoretical approach is given in tables 2 and 3.

As far as the general function of creating a public sphere is concerned, the Mongolian media outlet MNB and also Kyrgyzstan's OTRK have made major progress over the past years. In particular all political parties have opportunities to speak and be heard in the news programmes. As far as debate is concerned, MNB offers a wide range of formats, and OTRK at least rebroadcasts the popular political talkshow "Inconvenient Questions" produced by *Radio Azattyk* (Radio Free Europe/Radio Liberty).

At the same time there are also downsides in both cases: the quality of the news still has a lot of room for improvement, the ruling party, the government and the president are not criticized, there is self-censorship and only minimal agenda setting and in-depth research by the journalists of the former state media. The reporting on regional issues is rather limited.

That notwithstanding, the general function of supporting integration is fulfilled in many ways in these PSM; MNB, for example, offers a high share of domestically-produced content on traditional culture and values. OTRK, too, has moved in that direction. However, both outlets need to do more to let the people in the regions participate. Furthermore, there is a distinct lack of Uzbek language programming within the Kyrgyz PSM-system although Uzbeks make up around 14 per cent of the population as a whole, in the southern regions around 40 per cent.

A comparably higher performance with respect to public service functions is delivered by the two media outlets, TRM in Moldova and RTS in Serbia. They have undergone a more profound structural reform than OTRK and MNB in the past years. And they generally offer balanced and objective news, democratic debate, general orientation and criticism in society. However it still seems somewhat difficult for these organizations to criticize the government and its administration. Also agenda setting and serious journalistic research are rare. Both fulfil the general function of supporting integration although they are not the most innovative media outlets.

Related to the general functions is the question of whether the people in a country and civil society value these services and actively support their public service media. The information we collected through expert-interviews overall indicate rather different relationships here. In Mongolia and Moldova both PSM seem to enjoy a good reputation among citizens, particularly in rural areas (Institutul de Politici Publice 2013: 23-29; Press Institute 2013b). Civil society is also officially part of the governing bodies. But in Mongolia the government has recently made the nomination process for the National Council less and less transparent, and in Moldova party politics have a strong influence on the nomination of candidates.

RTS in Serbia is more advanced in this respect: it seems to enjoy a good reputation among the audience, despite its history as a propaganda instrument. Today,

independent actors from civil society are represented in the governing body. In Kyrgyzstan civil society organisations are particularly active on behalf of OTRK. Its supervisory board is one of the success stories of this transformation.

Based on these cases we can develop the hypothesis that there is a correlation between the structural transformation of a former state media, including its governance and newsroom structure, and the functions it serves: the more politically independent and professional the structure of the organization becomes, the more it can act according to the two general functions by creating a public sphere and by supporting integration.

Overall we can differentiate between two different types of media here. From our analysis the Mongolian outlet MNB and the Kyrgyz OTRK can be called *PSM in initial transformation*. They offer basic information services, forums for public debate and several integrative functions.

Meanwhile Moldovan TRM and Serbian RTS can be identified as *PSM in advanced transformation*. They offer, in addition to the above, objective and independent news journalism in acceptable professional quality, societal orientation and some criticism. But this category does not imply that all public service functions are fulfilled. For TRM and RTS there is certainly room for improvement: these media organisations can be encouraged to become more independent and act as the fourth estate, and they could become more innovative in their service to the public. All four media organisations studied here are cases where the transformation from state media was sufficiently successful for them to be called Public Service Media (PSM). They deliver a considerable part of the two general public service functions.

The role of media development actors

As our four cases have proven to be to some extent successful transformations of state media, the next question is what role media development organizations played in this process. They certainly were not the only actors in place; surely many others influenced the changes that took place, as well. As media development generally is part of large and complex overall social processes, we can only tentatively point to some processes without attributing the changes to media development actors only. In the following we summarize information from our case studies where changes in the media took place and where, at the same time, media development organizations were active in one way or another. We do this along the guidelines of strategic action of the DW Akademie model. In doing so we discuss the particular support strategies used by the media development actors.

Political and legal frameworks: Media development actors have in some of our cases helped to advance legal reform processes: In Mongolia, Kyrgyzstan and Serbia they have cooperated with civil society groups and other political actors and thus made more or less direct contributions to lawmaking processes and the establishment of more independent governing bodies controlling the media

outlets. Kyrgyzstan has shown particularly promising practice in this respect. Civil society here has achieved a lot and the director general of OTRK managed to advance reform: Long-term strategic consultancy provided by Internews and based on solid information gathered in various surveys certainly played a role throughout.

In many other cases this kind of work has been neglected. Media development organisations can only play a support role in the transformation process. In the highly politicized sphere of public broadcasters in transformation, the process can only be supported through joint efforts with strong local partners and a general political climate that is in favour of PSM. In the countries mentioned above this was the case and important opportunities were seized.

Qualifications: The poor qualification of the staff of former state broadcasters is a major obstacle in the transformation process towards PSM. Media development actors are traditionally very strong in this strategic area. But most of their activities in the past were short-term training projects without any systemic approach. And it is uncertain what was eventually achieved through them. An exception was the engagement of BBC Media Action at Serbia's RTS where a very broad capacity-building intervention was conducted over more than two years. The whole project, which was not simply a series of training workshops but a broad capacity-building and consultancy effort within the organization, had a long-term effect also on the organizational structures and eventually the quality of the content produced. The key to success here seems to have been that, before the intervention, a new legal framework paved the way for reform and also acted upon the will within the media outlet to change the way it operated. So in this case a media development organization came at the right time to offer a broad programme of capacity building. The services were developed through joint planning with the broadcaster according to the identified needs.

Generally most of the capacity building is provided by the media development organizations themselves. Only in a few cases did they attempt to build sustainable structures in the country for journalism capacity building: In the case of Kyrgyzstan the broadcaster was encouraged to set up its own training center, and in Moldova the management is at least planning to establish such a department. In Mongolia the NGO "Press Institute" was supported in its efforts to offer journalism training by the Western organizations. Serbia's RTS has introduced a mentoring programme to support young journalists in their work. So overall the key to sustainable success for media development in this domain is to establish mechanisms for staff capacity building with the media organizations early on. The example of RTS shows how important it is to lay a solid methodological basis at the beginning of the process.

Professionalism and economic sustainability of the media sector: In all cases, the programming structure of the former state broadcasters did not correspond with the obligations of public service media in terms of audiences addressed and content. Therefore, the work of media development actors in several cases focused

on new journalistic formats and on organizational and management reform. New programs and formats were created and with them new teams and departments: dedicated radio channels for minorities were built (Mongolia), news and current affairs departments were restructured (Serbia, Moldova), networks of regional correspondents were set up or revitalized (Serbia), youth radio and children's programs and new multimedia departments were launched (Moldova). In Mongolia and Serbia structural reform in the media organization was achieved, mostly based on new concepts in programming or ideas for professional capacity building. In Kyrgyzstan, Serbia and Mongolia technical support was provided.

But generally these PSM bureaucracies are not very fast at putting new ideas or technologies into practice. Some of them struggle with the provision of elementary equipment like computers just as with the introduction of new workflows. And they are completely at a loss with regard to major challenges like the upcoming digital switchover in the TV sector. The cases of the multimedia department in Moldova and the internet and mobile services in Kyrgyzstan and Serbia show however that some innovative approaches have been realized. Media development actors overall can do more here, it seems, by integrating innovation, technological support and sustainable media development into broader PSM strategies.

The question of media financing and economic sustainability was generally not the focus of the media development work although it is a crucial issue. In the case of Kyrgyzstan at least, financial audits were made to make better use of the budget and identify new ways of funding. And in some cases the media organizations and their governing bodies themselves undertook a process of restructuring their financial strategies, as in the case of Mongolia.

General human resources management in PSM has also so far been a smaller issue in the interventions. This finding is a surprise, given the fact that the large size of the staff and the usually rather limited financial means is one of the major problems of many (former) state media organisations.

Needless to say, this issue is one of the difficult ones in the transformation process. Even if it is legally or socially impossible to sack a large number of the staff, other paths need to be identified. For example the staff's ownership of change processes within PSM has mostly not been dealt with adequately. People working in a large organization need to be given the opportunity to understand and actively take part in reform. Overall, media development has so far managed to introduce fully-fledged processes of organizational development only in a very limited number of cases.

Social participation: In the cases we assessed here, some PSM have made efforts to increase the participation of citizens. We can differentiate two areas here: First, the participation of citizens from different population groups in the media. And second, the appearance and participation of civil society in the media.

In our case studies a number of new participatory formats for minorities, and also for the public at large, were developed with the support of media development organizations. The case of Moldova shows that the development of a new multimedia department that allows for new forms of interaction is ultimately

feasible. Overall however, the journalistic skill involved in including ordinary people in the reporting and giving them a voice, for example through sound-bites, story-telling or discussion formats, remains a challenge. A lot more can be done in this domain, not only with journalism training but also through capacity building of staff with regard to PSM and its obligations. Kyrgyzstan's OTRK has installed feedback channels both on- and offline and viewers' criticism is acted upon.

As far as the strengthening of civil society is concerned, we only see progress in the case of Kyrgyzstan. In Moldova civil society has been active on the governing board but was overall disappointed by the slow transformation process. Here again, more fundamental work by media development actors is needed. After all, a transformation process without an active role for civil society seems hardly possible.

In sum, media development was able to successfully enhance the professional capacity of part of the journalist and technical staff in the four cases studied here. This often went along with the restructuring of newsrooms and the development of new formats for journalistic content. But international media experts have provided the training and consultancy themselves most of the time, instead of supporting capacity-building and human resources structures in or near the supported media outlets.

Generally it seems that a large part of the more complex structural processes were pursued and advanced by the partners in the countries themselves, such as the legal reforms and the various activities of the governing board, and the organizational changes within the media. At best, media development actors should be able to take over the role of catalysts and moderators of these processes. But in our examples they came in rather late - after many hurdles had been taken already.

We can conclude that media developers and their partners have successfully used windows of opportunity for cooperation: In the four cases studied several elements came together: a general political agenda to reform the media, a specific engagement from the management of the media and some support from the population and civil society. In this situation media development actors seemed to have advanced the processes of change by offering their specific services.

But it should be mentioned that these processes were also to some extent hindered or slowed down by lack of political will, lack of leadership within the organization, bureaucratic structures and limited engagement for change by the staff. And yet the window of opportunity was open long enough for at least some important changes to pass through and be sustained.

Outlook: The Future of Media Development for PSM

Our four cases suggest that media development actors can play an important role in the transformation of state media. These transformed media outlets are able to fulfill a number of important public service functions and therefore can be called

Public Service Media. But at the same time it should be stressed that these four are the most promising cases that we could identify through our research.

A first lesson is that one should not expect too much from state media transformation. A PSM in initial transformation can at best deliver some elementary media functions, such as letting all political parties speak and offering forums for debate - while many other sizeable problems remain. Meanwhile, promising and important paths for journalism remain untrodden, and potential for further social integration remains undiscovered. Also major obstacles related to the legal basis, control and financing of the PSM may remain.

And yet very fundamental and important steps have been successfully taken if a state media outlet has become a PSM in transformation. The outlet has been oriented structurally towards more service to the public and less to the state, and the concept of public service media has been merged into civil society discourse.

Advancing things further will in most cases require perseverance. In the past, many promising beginnings were followed by major setbacks, such as changes in government media policy. Transformation can only prove successful if windows of opportunity are effectively used and efforts are made to sustain the change. Generally a broad intervention seems justified if, in a given country, there is a general will on the part of both political and civil society actors for a change process. An agenda of cooperation and a strategic plan for reform then need to be developed. In this a maximum of local expertise needs to be included as well as a continuous coordination of all stakeholders.

As described in our hypothesis above: if the structural transformation is advancing then the delivery of the different functions of the PSM can be improved, too.

In the past, media development organizations have too often limited themselves to capacity building and newsroom consultancy only. Instead, three other areas need to be considered and worked on from the outset: the legal frameworks, the question of economic sustainability and the organizational development of the media. Improvements in legislation and regulation are – ideally - established at the inception of such a broad change process. But often this is only done partially or never gets beyond the planning stage. As a consequence media outlets as well as media development struggle with adverse and unclear situations. Long-term work is needed here on the part of several actors, towards special laws that guarantee freedom of information and expression, the independence of PSM and their governing bodies, laws for community media, fair and transparent licensing procedures, etc. For media development it is important that they support local experts for media law, coalitions for advocacy, lobbying and communications, and develop processes for the supply of legal knowledge and advice.

The question of economic sustainability of the media outlet in question should also be made an issue from the outset. Financial questions as well as issues related to human resources need to be dealt with in conjunction with technical and programming changes. Media development has made advances in this direction over the past years but more work needs to be done.

And thirdly, for the transformation processes related to large media outlets a broad organizational development approach has to be planned and carried out systematically.

As for the practice of media development and the work on the content produced by the aspiring PSM, the question often arises in which area to invest the available resources. In the past, often “flagship”-projects have been created that yield some impressive results and, ideally, lead the way for other departments. But the building-site for such a flagship needs to be carefully chosen. It may not always be a good idea to change TV news departments first of all, as they are highly political and thus difficult departments to deal with.

If one nevertheless chooses to work with the news departments, small steps are important: The use of sound-bites from both the opposition and government constitutes a major achievement. Even in comparably advanced PSM it is difficult to criticize the government. Media development actors should facilitate the discussions on what is possible and what can be done to improve the news.

Major advancements have also been achieved in departments that produce other formats like public debate, educational soap operas or specialized programs on economic, health or environment issues. And, last but not least, the strengthening of regional offices and minority programs is often another potential success.

In all this, capacity building should be understood in a much broader sense than hitherto: It should reach beyond journalism to other areas, particularly management capacity in media outlets, for example, and the legal and advocacy capacities within civil society organizations. And capacity building should be part of a human resources strategy. Media development actors should be there, not only to build capacities but also to enable structures for capacity building.

Overall for more successful strategies in this domain, media development actors need to engage in broad processes of learning themselves. This means, first of all, an engagement in research, monitoring and evaluation. They need to work towards well-grounded strategic criteria on why they choose a particular process in a given situation. And they might even foresee earlier when a window of opportunity begins to approach and what can be done to open it even further.

It might also help to bear in mind that even the BBC model was not installed in one single move. In the United Kingdom the idea and realisation of independent broadcasting in the public service needed to be developed and defended.⁶ And in Germany, first after World War II and then after the fall of the Berlin Wall in 1989, PSM was not established in an ideal democratic process (Diller 1999: 148-159; Hoffmann-Riem 1997; Kilborn 1993; Hanfeld 2014). This great idea has always had to survive major conflicts. It needs to mature, gradually, over the decades.

⁶ <http://www.bbc.co.uk/historyofthebbc/resources/bbcandgov/> (download 24.08.2014).

Acknowledgements

We would like to thank Dr. Gabriele Geier of the German Ministry for Development (BMZ) for inspiring this research. We also thank the following media experts for their advice: Susan Abbott, James Deane, Simon Derry, Corina Cepoi, Dr. Toby Mendel, Dr. Mary Myers, Julia Glyn-Pickett, Bettina Ruigies, Biljana Tatomir, Michael Tecklenburg, Mathis Winkler and Mark Walsh. Finally we would like to thank our colleagues at DW Akademie's research and development department, Esther Dorn-Fellermann, Richard Fuchs, Peter Deselaers, Simon Didszuweit, Lina Hartweg, Dr. John Kluempers, Alexander Matschke and Yordanka Yordankova. This research was funded by BMZ.

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Jan Lublinski is the head of the Research and Evaluation team at DW Akademie. He has trained and consulted in numerous media outlets in Africa and the Arab world, and he is an expert in monitoring and evaluation frameworks in media development projects. Jan Lublinski started his career as a journalist with the daily newspaper Frankfurter Rundschau and worked 20 years as a freelance reporter for various print media, including the magazine GEO, as well as for German Public Radio and Television (ARD). He has won several journalism awards for his work, among them the Holtzbrinck Prize for Science Journalism (2011) and the German Development Media Award (2010). For his PhD in journalism studies, he conducted newsroom research in a project at the TU Dortmund University.

Laura Schneider works as project manager for DW Akademie. Her area of expertise is media freedom measurement, particularly international press freedom indices. Her PhD thesis provides ideas for a new instrument for assessing media freedom globally. Ms. Schneider has been a consultant for UNESCO, an analyst for Freedom House, and project coordinator at the International Media Center in Hamburg. She has worked as a journalist for several German media outlets such as Spiegel Online and the German press agency dpa, and was a radio and newspaper reporter in Mexico. Laura Schneider completed her BA and MA degrees in journalism, media and communication science, and Latin American studies at the universities of Hamburg, Guadalajara (Mexico), and Sydney.

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Jackie Wilson-Bakare has been a broadcaster and journalist for over 25 years, many of which were spent working – as freelance editor and producer, newscaster, and studio host – for Deutsche Welle, Germany’s international broadcaster. She has worked in West Africa, in Southern Africa and in Central Asia, and has more recently brought her considerable experience and acquired skills to bear on the fields of training and research. Having worked with journalists from all over the world, Ms. Wilson knows from personal experience how vital a confident and skilled media community is at all stages of societal development.

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