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COMUNICACIÓN E INFORMACIÓN

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EXECUTIVE SUMMARY

Quality Indicators in Public Broadcasters: A Contemporary Evaluation

Public broadcasting institutions or companies around the world are facing the daily challenge of producing and disseminating quality content that measures up to the real demands of their communities. This is a complex problem because there are no consolidated and rational ways to quantify, measure, and know whether such challenge is being met, according to parameters that are public and easy to understand. Public broadcasters cannot and should not only rely on audience measurement instruments and analyses (ratings), developed according to market criteria. Therefore, defining a set of external indicators is essential. These indicators must make broadcaster and team performance

evaluations more objective, enabling continuous comparisons and quantifiable improvement processes. In sum, the sector needs indicators that enable societies—which, at the end of the day, pay for these companies—to follow-up and assess services rendered to them. This study aims at compiling a large set of indicators, related to such fields as information transparency and use of public resources, broadcaster production diversity, originality, and concern with new languages and platforms, among others. However, the study does not and should not have the ambition of presenting a closed model. On the contrary, it offers indicators that may later be adapted to each institution's specific needs and peculiarities.

RESUMEN EJECUTIVO

Indicadores de calidad de las emisoras públicas Evaluación contemporánea

En todo el mundo, día a día, las empresas o instituciones públicas de radiodifusión deben enfrentar el desafío de producir y difundir contenidos de calidad, que estén a la altura de la demanda real de las comunidades a las que están vinculadas. Se trata de un desafío complejo, especialmente debido a que no existen formas consolidadas y racionales para cuantificar, medir y saber si, según los parámetros públicos comprensibles, se está logrando o no vencer ese desafío. Las emisoras públicas no pueden ni deben contar solamente con los instrumentos de análisis y estudio de audiencias (rating) desarrollados conforme a criterios de mercado. Por este motivo, es imperativo que se defina un conjunto de indicadores externos al mercado, cuyo propósito será encontrar formas de lograr que las evaluaciones de desempeño de dichas instituciones y sus equipos sean objetivas,

de forma que se puedan realizar comparaciones permanentes y procesos de mejoramiento cuantificables. En definitiva, se trata de crear indicadores a través de los cuales la sociedad que, en última instancia, paga por esas empresas pueda monitorear y evaluar la prestación de servicios que recibe. Este estudio pretende compilar un gran conjunto de indicadores relacionados con campos tales como transparencia de la información, uso de los recursos públicos, diversidad en la producción de las emisoras, originalidad, y preocupación por los nuevos lenguajes y plataformas, entre otros. Sin embargo, el estudio no tiene ni debe tener la ambición de presentar un modelo cerrado. Por el contrario, ofrecerá indicadores que podrán luego adaptarse a las necesidades y particularidades de cada institución.

RÉSUMÉ

Indicateurs de qualité des diffuseurs de service public Évaluation actuelle

Partout dans le monde, chaque jour, les entreprises ou les institutions publiques de radiodiffusion doivent relever un défi: celui de produire et de diffuser des contenus de qualité. Ces derniers doivent être à la hauteur de la demande réelle des communautés auxquelles elles sont liées. Il s'agit d'un défi complexe car il n'existe pas une méthode solide et rationnelle afin de quantifier et de mesurer. Ainsi, il est difficile de savoir si le défi sera relevé, à travers des paramètres publics intelligibles. Les diffuseurs de service public ne peuvent pas, et ne doivent pas, utiliser seulement des outils d'analyse et d'étude d'audience (*rating*) développés selon les critères du marché. Ainsi, la définition d'un ensemble d'indicateurs ne tenant pas en compte le marché est impérative. Cela va contribuer à obtenir des évaluations objectives concernant la performance des institutions et de leurs équipes, et d'effectuer des

comparaisons à long terme et de mettre en place des processus d'amélioration quantifiables. En définitive, il s'agit de créer des indicateurs parmi lesquels la société, qui en fin de compte contribue de manière financière, puisse contrôler et évaluer la prestation de services qu'elle reçoit. Cette étude vise à réunir un vaste ensemble d'indicateurs liés à plusieurs champs d'actions : la transparence de l'information, l'utilisation des ressources de l'État, la diversité au niveau de la production de la part des diffuseurs, l'originalité, et notamment l'intérêt pour de nouveaux styles ainsi que pour de nouvelles plateformes de diffusion. L'étude n'a pas l'ambition -et ne doit pas l'avoir- de présenter un modèle fermé.

Au contraire, elle s'intéressera plutôt à des indicateurs susceptibles de s'adapter aux besoins et aux singularités de chaque institution.

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P R E S E N T A T I O N

Public broadcasting remains an essential part of the truly plural, free, and independent media systems. A vigorous public broadcasting structure that complies with international best practices is the ideal complement to the private and community actors that form media ecosystems, which, in turn, is of the utmost importance for democracy.

With such documents as *Media Development Indicators*, and international comparative studies as Toby Mendel's *Public Service Broadcasting: A Comparative Legal Survey* (jointly published recently with EBC—Empresa Brasil de Comunicação—in Portuguese), UNESCO has underscored the main features that define a broadcasting service as “public,” and the key place of public broadcasters in media development.

Although public broadcasting systems in place all over the world are structured according to different models, they share or should share several core attributes: 1) editorial and financial independence; 2) autonomy of the governance bodies; 3) programming plurality, diversity and fairness; 4) a defined public service mandate, established in appropriate legal documents; 5) public accountability and independent regulatory authorities.

Accordingly, those sectors of society that promote and guarantee public media presence are in need of adequate tools. How can we perform an evaluation when the aforementioned criteria constitute an integral part of a country's public broadcasting structures?

There is no easy answer to this question. The chosen strategy could lead to higher subjectivity, and the effort of evaluating a given public broad-

caster with as much objectivity as possible could be lost in an imbroglia of methodological, conceptual, ideological, and political controversies.

For this reason and seeking to increase the capacity of all actors concerned in the improvement of the quality of accountability mechanisms in institutions known as public broadcasters, we have invited three specialists to write a document for debate, about indicators that contribute to a deeper analysis of broadcasters' performance according to international guidelines.

Eugênio Bucci, Marco Chiaretti, and Ana Maria Fiorini, authors of the document, *Quality Indicators in Public Broadcasters: A Contemporary Evaluation*, performed a sound study that offers more than a hundred indicators for discussion. These indicators, taken as a whole, can be a very useful tool to develop an informed dialogue about public broadcasting productions.

These indicators will be valuable for the external actors but also for the broadcasting companies themselves, to implement Corporate Social Responsibility strategies, hold dialogues with the concerned population, and for the work of governance bodies.

The authors made an extended use of the available international literature on the topic, as of Bucci's experience as a manager and specialist in the public broadcasting field. Also, a first draft of the document was debated with the participants of the International Seminar on Public Media, organized by UNESCO and EBT during the first semester of 2011.

This document is one of the many initiatives coordinated by the UNESCO Office in Brazil that seek to provide the Brazilian society with concrete elements for an increasingly broader and more plural debate about the pillars of the media systems. Accordingly, the debates on freedom of expression, freedom of information, media regulation, protection of vulnera-

ble groups, and community and public broadcasting are just pieces of a single jigsaw puzzle.

We hope that this document, and all documents included in the *Debates Series*, are useful for the increasingly deep insights that have gradually circulated in the Brazilian public sphere about a topic of the utmost importance for the strengthening of communications

Communication and Information Unit
UNESCO Brazil

1. Introduction

1.1 Notice to the Reader

Given the broad range of different broadcasters and broadcasting models in the world, it is not possible (and even undesirable) to develop a single group of indicators that resort to mathematical criteria and strict metrics to provide conclusive figures to certify a broadcaster's programming quality and to enable comparison. Such an outcome will be impossible to obtain from figures. Comparisons will be impossible to make with metrics. Broadcasters may or may not develop a relationship with the communities that host and support them and that should benefit from their cultural and news content. These relationships are embedded in culture and in the broadcasting market. Broadcasters also have a political dimension, so those who study or manage them with honest intentions should adopt a perspective whereby quality indicators are seen through the prism of the local historical particularities, be they temporary or permanent, circumstantial or structural. Thus, indicators should be weighted according to the broadcaster's individual circumstances, mission and social, cultural, economic, and political environment. There is no single, closed basket of metrics that could be universally applied to all broadcasters without adaptation.

This does not mean, however, that indicators are superfluous. On the contrary, they are essential, and some indicators might even be universal, after all particularities are taken into account. Such would be the case, for instance, of some audience measures (the audience share of a certain broadcaster, among the general spectrum of public or private

broadcasters; the level of loyalty of certain audience groups, such as children), or the transparency levels of the broadcaster's economic and financial management, among others. Public broadcasters are naturally compelled to accountability, given that they are media institutions with a mandate to educate and inform the citizenship in the name of democratic values, based on human rights and operating with public funds. Unbiased accountability of public broadcasters requires indicators that show improvements and delays in service and management performance, based on rational comparisons. By their own nature, public broadcasters must use indicators as parameters for strategic management (for the medium and the long term) and for day-to-day administration. By this means only can they offer an objective justification to the public, the citizenship and their representatives, of the company's hiring and dismissal policies, adopted and adapted career plans, investments in equipment acquisition, the choice between in-house or independent productions, and other additional actions. In sum, in public broadcasting a lack of indicators results in a lack of transparency and democracy. As we mentioned before, in an era of technology and figure fetishism, indicators should not be deemed a sort of oracle, as it sometimes happens. But indicators remain essential: people who try to disparage their value are simply seeking obscurity and indiscipline. This should not be doubted.

Thus, this document aims at providing support for public broadcasters' transparency policies, offering possible principles for the adoption of an indicator-based management model. Clearly, this doc-

ument does not offer closed and ready formulas, which would only be possible if we were addressing a single broadcaster or broadcasting network, or even a single broadcasting system. But in our case, given the fact that this material will be read by public broadcasting managers from all five continents, it is more reasonable to provide different elements that can be combined in accordance with each particular situation, so that they foster a transparent administration and quality programming that may be measured according to community-valued parameters.

However, the reader should bear the specific intention of this document in mind, which cannot be overlooked when using the tools provided. First, we attempt to strengthen the control held by the citizenship and its democratically elected representatives over public media institutions. We believe that administrations that fail to be systematically accountable to society are neither producing nor disseminating quality public communication. But because stating a belief is not enough, we could always show the numerous pieces of evidence obtained during the twentieth century that can support our argument. Second, we aim to develop instruments that enable a clearer and more frequent participation of society in the evaluation of the services provided by broadcasters. We maintain that part of a public broadcaster's programming quality can be quantified with objective criteria. But this should be taken with care: we are not referring to the overall aesthetic quality, as it is obviously impossible to create a metric to quantify the quality of, say, a work of art. This is not the place for a debate that has already been settled, so we shouldn't devote further time to its discussion. Let us just clearly state that in a democracy there is no way to assess the aesthetic quality of human expression with a number. Such a pretension would not be democratic, but authoritarian, because it requires a single standard to value diversity and that which is mainly made of surprise or revelation. This is not what this document seeks: on the contrary, it aims at measuring with indicators *that element of programming quality which can actually be measured with indicators*. For instance, the degree of diversity in programming, and the number and significance of reporting mistakes may and should be measured with indicators. As we shall see in what follows, in many cases in-

dicators do contribute to assessing quality, and our efforts address these particular cases.

1.2 The Value of Independence

Public broadcasting has given rise to a rich and decade-long international debate that clarifies the rationale for the existence of a public broadcaster and its definition, scope, needs and possibilities. This debate has been more present in democratic countries that began building a public broadcasting network (radio first, television later) during the first half of the twentieth century. These democracies sought to use networks for non-market driven, mass social communications. Thus they achieved a broadly accepted clarification regarding the function of public broadcasters: as mediators in social debates whereby democratic solutions are reached, these organizations could not only be profit-driven. By the same reasoning that public broadcasters were established in the US and in Europe, regulatory agencies were also created in many of these countries, to prevent monopolies and media cross-ownership. The aim has always been to protect diversity of opinions and, at the same time, to shield the market from oligopolistic interests that could hinder a healthy competition.

In short, the same ideas that are at the core of public broadcasting curb the creation of monopolies and oligopolies. From this perspective, broadcasting can only be a public service (even when it is exploited by private companies through public concessions). Thus, in practice, and not only in the letter of the law, broadcasting should offer information and culture, help society access independent information, and foster the free circulation of ideas and the critical thinking of the citizenship. Public broadcasters must lead and must be reference points in these processes, of an almost universal nature.

Today it is no longer reasonable to presume an opposition between public and private broadcasters. Contemporary debates are increasingly and unanimously underscoring the fact that these are two interdependent systems that need each other and that are needed for democracy.

Among other, these debates focus on the concept of broadcaster independence or autonomy vis-à-vis the state or, particularly, the government.

Broadcasters can only be public if they are independent. But for evident reasons broadcasters should also be independent from the market: given their public nature, the communication and programming quality of these broadcasters also originates in their political, administrative and editorial independence. Broadcasters that are servile to power or the market cannot produce quality public programming, and are unable to offer the cultural alternatives they should offer society: programming produced with a critical perspective and that is detached from power and the market. If public broadcasters were an extension of government, they would not be able to generate debates to criticize that power. If they were faithful followers of the rules of the advertising market, broadcasters would not be able or know how to offer programming with a sufficiently critical perspective of the realities of the market.

In this sense, broadcasters' programming quality and their relationship with a target population sector or sectors result from broadcaster independence, and contribute to strengthen this independence. The more independent the broadcaster, the better equipped for quality. The better the quality of programming, the more independent the broadcaster.

Thus, the key point here is understanding the meaning of quality and of independence and autonomy in the realm of public broadcasting. Can these values be measured? Does the public have the means to follow up such appraisal?

1.3 Concept Clarification

Before dealing with the answers to these questions, we must begin expanding on our initial concept. In a democracy (in this document we will consider democracy as a preliminary condition), public broadcasters exist to guarantee society's right to information, culture, the expression of differences, to dealing with deficiencies and potentialities, and to a free flow of ideas. Public broadcasters must guarantee the public's right to criticize power, to imagine a different world, to communicate the progress of their ideas and to use them for their freedom.

The universal right of citizens to information and free communication is particularly applied to the media, including public broadcasters and organizations. For the Inter-American Court of Human Rights, "it is the media that makes freedom of expression a reality." For the European Court of Human Rights, the media are as entitled to disseminate information and ideas about issues of public interest as the population is entitled to receive that information and those ideas. In other words, the former have a right because the latter has a right.

Additionally, when dealing with public broadcasting, three main requirements need to be taken into account. First, from a legal point of view, the *public nature of broadcaster ownership*: by definition, a public broadcaster cannot be owned by private groups. Although it may receive private funding, a public broadcaster cannot be in the hands of private shareholders.

Second, it is essential that the funding of the broadcaster's operations is protected by public regulations compliant with existing legislation and guaranteed by the state. As we shall see later, while public broadcasters cannot be made subject to the government, *their existence and funding should be guaranteed by the current legislation*. The legal system ultimately regulates public broadcasters' sustainability. Thus, although the source of funding could be the households that own a television set (the case of the BBC), it is the legal system that compels that funding and that guarantees that those funds will be safely deposited in the broadcaster's money box.

The origin of the funds should not impose an administrative or editorial line. The core idea of the concept of public broadcaster lies in its full independence.

But yet another point must be made regarding independence: it refers to a vital distancing from state power or from the more or less partisan power that rules over the government and that stretches out to the state and administrative structures. These two power sources, frequently blended and intertwined, share an inclination to reject criticism by making use of the material or symbolic means available.

For public broadcasters, independence cannot be gained without regulation. On the contrary, broadcasters can only be independent when they

comply with state-guaranteed standards. When referring to public broadcasters, independence means *legal autonomy*. Autonomy (i.e., an intransigence about any form of external interference that may lead to censorship) is not equal to lack of regulation. A democratically driven audiovisual and news production contributes to suppressing (or at least to minimizing) the risk of censorship and strengthening a free environment.

It is in this sense that we asserted above that the quality of all types and scopes of radio and television public broadcasters is also under the constant threat of another power: the economic power, or the market. Any media or broadcasting product that must conform to market forces winds up burdened by needs and styles dictated by these forces and that, in the long run, externally impose time, cuts and choices.

What should be clear is that, regarding formal independence from advertisers' demands, autonomous public broadcasters and private commercial broadcasters are not different. All broadcasters that want to survive and gain credibility and bigger audiences seek this distance. In sum, independence is an essential value for all news media. For this reason we have also attempted to refer to market independence in a specialized and distinctive way, as the effort to remain autonomous from the format, time, breaks, and styles determined by advertising, inevitably pervading commercial broadcasters (and this could not be otherwise, as private broadcasters also exist to bring the advertiser's message to the consumer). And precisely because public broadcasters do not follow the logic of the market as their private counterparts are public broadcasters so necessary to society. If they did, they would just be more of the same

1.4 Critical Broadcasters in a Goods-Dominated World

Although the world of goods does not comprehend the whole world, it includes almost all of it. What we usually call cultural goods cannot be deemed simple "goods," and least of all when it comes to public information. From an aesthetic point of view, public broadcasting should aim at destroying the aura of goods. And we contend that, but for this element, public broadcasting could be dispensed with. It is definitely not to strengthen the dominance of goods in society that democracy needs public broadcasting.

When piercing the veil of a sort of "standard credibility" defined by the entertainment industry and ingrained in the collective imagination, the public broadcaster is able to foster language innovation in the face of the language employed by commercial communication. And by so doing, public broadcasting challenges the idea that a multimedia product is only and exclusively meant for individual use and immediate enjoyment. Thus, it does not operate at the same level publicity does. As one of the authors of this document underscored elsewhere, "the business of public broadcasting is not entertainment, and not even television: its business is culture, information, and freedom"¹.

Thus, when thinking about quality indicators, independence could boil down to two different elements. First, vis-à-vis the political structure (state and government), it involves an assessment of the degree of autonomy of the decisions on administrative, contents, programming, and reporting guidelines issues. Second, in relation to the market, although this is somewhat more complex, it involves determining whether public broadcasters are able to offer the audience a perspective clearly detached from typical market-oriented communication.

1. BUCCI, E., É possível fazer televisão pública no Brasil?, en *Novos Estudos*, 88, São Paulo, Cebrap, December 2010. It should be noted that this interpretation includes rather complex nuances, as Omar Rincón mentions in his book *Televisión pública del consumidor al ciudadano* (Public television from the consumer to the citizen). The author is skeptical about what people would do if they watched less television, and believes there exists a "television intelligence," i.e., a television understanding of life and the world that is based on TV stereotypes because of its mass nature. Apart from content, successful television (and public broadcasters would not escape this model) should meet the viewers' desire to watch TV, the need for progress, to make heroes out of ordinary people, to find in TV life's unanswered questions, to bring new topics to daily conversation, and to enable a reflection about the meaning of life in these times of lack of privacy and excess of publicity. Rincón gives importance to calling the public's attention and fostering an active citizenry for the solution of social problems with the available resources. Producing public television without an audience would be meaningless.

1.5 Non-Commercial Communication in Public Spaces

As we already mentioned, in Europe (where there is a broader tendency to social democratic/welfare state models) and the US (with a social communication environment mostly based on a purely commercial broadcasting model), the public space has been defined by the applicability of public regulations for the preservation of multiple voices. Legislators were concerned about protecting the system against the dangers posed by an hyper valorization of ratings and market concentration.

As Toby Mendel mentions,² the Public Service Broadcaster (PSB) system contributes to strengthening a public sphere for the discussion and dissemination of ideas and information that are essential for a democratic society. PSB is the general name given to a public broadcasting system in several countries, such as Great Britain, Japan, and the US (where the name of the public broadcaster network is PBS, *Public Broadcasting Service*). This term is used for a public interest service that meets the following three criteria:

1. Independence, guaranteed by adequate structures such as plural and independent administrative councils;
2. Dependable funding, to meet the public's needs and interests and the promotion of the free circulation of information and ideas;
3. Transparency, which requires broadcasters to be directly accountable to the public, which means that they can be subject to direct and transparent monitoring, particularly regarding compliance with their mission and the use of public funds.

In fact, in the case of public broadcasters the evaluation criteria and metrics are ultimately only valid when shared with the public that defines and pays for them. Thus, transparency becomes a prior condition.

In the book *Broadcasting law: a comparative study*³, Eric Barendt identifies the following six key attributes of public broadcasters:

1. General geographical availability: It would not be appropriate to offer a public service to only part of the population.
2. Concern for national identity and culture: By developing a sense of nationality, belonging and participation in the people, public broadcasters foster democracy and the respect of individual rights. This is a controversial attribute because it may lead to editorial restrictions and chauvinism. However, today it also includes the idea of the promotion of multiculturalism as one dimension of nationality.
3. Independence from both the state and commercial interests: Offering quality programming that meets the public needs is impossible if the public broadcaster has to compete for funding like a commercial broadcaster (which would entail conditioning programming to audience ratings). Thus, funding should not be dependent on commercial interests, even in cases of public-private funding. However, the greatest threat to public broadcasters still comes from government interference in the editorial line and attempting to use broadcasters for propaganda purposes. This is a tension-ridden issue, because the quest for public funding and independence from commercial interests could generate government interference.
4. Impartiality of programmes: This attribute is largely related to independence. Just like the government should not use a public broadcasting service to further its point of view, public broadcasters should also avoid promoting a particular perspective or supporting a particular political party.
5. Range and variety of programmes: Public broadcasters should offer diversity of programming that includes education and information programmes. Here lies the biggest difference with commercial broadcasters, that usually choose low cost programming (films and games programmes). Programming variety is rooted in the right of the public to information. It aims to guarantee public access to information about a wide range of topics and issues.

2. MENDEL, T., *Public Service Broadcasting: a comparative legal survey*, Paris, UNESCO, 2011, p. 3.

3. Cited in MENDEL 2011, op. cit., pp. 6-8

6. Substantial financing by a general charge on users: Not all countries levy this tax, and the common practice is for the legislative assembly to allocate the funds for the public broadcaster. The advantage of a user charge is a more stable funding that is less subject to government changes, although it is the government which ultimately defines, manages and divides this charge amongst the public broadcasters. Thus, one of the disadvantages is the political difficulty of creating this system from nothing, as it may force the institution to compete for an audience to justify the tax instead of focusing on quality and diverse programming.

1.6 Funding and its Effects on Identity

The most difficult aspect to understand about public broadcasting is funding. Specialists question the government's allocation of public funds because they deem it a weakening factor, given that the broadcaster becomes more vulnerable to political influencing, mainly over its editorial line. But funding that comes from the market also entails difficulties. Thus, advertising funds are also taken with caution: when a public broadcaster competes with private broadcasters for publicity, it is also forsaking some of the attributes it should be aspiring to, such as a rhythm and an aesthetic unaffected by advertising breaks. When competing for resources, the public broadcasters are given to behaviors (at different levels) similar to ordinary broadcasters. There is an additional problem about this requirement: when a public broadcaster competes with commercial media for advertisers, it usually benefits from an advantageous situation because part of its budget usually comes from state funding.

In any case, the debate about the funding model is not merely economic. It is also connected with public broadcasting dependence or independence from the state and the market, and it also bears consequences on quality. The debate about funding

also means debating about the legitimacy and purpose of public television, with a focus on programming quality, and internal and external standing regarding other social communication media.

Today public broadcasting is strongest in Great Britain, Germany, and the Scandinavian countries. In the US, France, the Netherlands, Canada, New Zealand, and Australia public broadcasting has met with difficulties, due either to budget cuts or to its relationship with the government⁴. According to Rodney Benson and Matthew Powers, public television faces two main challenges: first, increasing commercial pressure, and second, "the increasing difficulty of balancing demands to simultaneously appeal to large audiences and to uphold public service values such as ... representation of diverse voices and viewpoints⁵.

There are several ways to fund public television, from direct state funding to diverse commercial resources generated by services rendered or dues paid by telecommunications and media companies, to advertising. For instance, most European broadcasters are funded by a fee charged to television-owning households, but there are other similar formats with details that exceed this document. TVN, the Chilean public television (*Televisión Nacional*), is funded by advertising. Many PBS (the US public broadcaster) local stations behave in a totally different way: they supplement their income with voluntary, non-compulsory, individual donations from the citizens.

What is the best recipe? Consensus has not yet been reached. According to Stylianos Papatthanassopoulos, "Direct public or government funding may, in one way or another, seriously affect public broadcasters' independence, or in the best case, the public perception of their independence"⁶. Papatthanassopoulos argues that citizens feel better represented when public broadcasters are funded by fees than when directly funded by the government.

In countries such as Great Britain, Japan, Germany and the Scandinavian nations, where public broadcaster receives more systematic and stable

4. BENSON, R. y POWERS, M., *Public Media and Political Independence: Lessons for the Future of Journalism from Around the World*, February 2011, p. 5. Available from <http://www.savethenews.org/files/public-media-and-political-independence.pdf>. Consultado el 17 de junio de 2011.

5. *Ibíd*

6. PAPANATHANASSOPOULOS 2007, cited in BENSON and POWERS 2011, *ibid.*, p. 12

funding, the fees account for a significant portion of the budget. The British BBC is funded by the viewers, although almost 20% of the broadcaster's global budget comes from BBC World's commercial operations. In Germany, funding from the fee imposed on users (almost 86%) is supplemented with commercial income, such as the sale of programmes and advertising. But commercial advertisements here cannot be longer than 20 minutes of the total daily programming and cannot be broadcasted after 8pm, or on Sundays. 100% income comes from user fees in Japan. In Sweden, Norway, Denmark, and Finland fees account for more than 90% of the public broadcasters' income, and the rest comes from the sale of programmes, sponsors and, in some cases, advertising.

Although a user fee has undeniable advantages, in cases where it is not yet in place, its implementation usually entails a political cost that few governments are willing to pay, and the level of acceptance may vary from one country to the other. Also, in an age of paid television where the speed of the technological changes is leaving behind the paradigm of electromagnetic waves—typical of open signal television—, it becomes increasingly less probable that citizens will accept this solution in countries where fees have not yet been applied.

Advertising in public television is also a contested issue. Among others, Diego Portales Cifuentes argues that “the best alternative seems to be a combination of major advertising funding and state subsidies for certain types of programmes”⁷. Despite acknowledging/conceding that “reaching for an audience immediately created by advertising funding leaves a narrow margin for programme experimentation, innovation, and diversity for broadcasters that are exclusively commercially regulated”⁸, Cifuentes gives priority to the independence of public broadcasters from the state. He believes that “companies that are dependent upon annual approval of a public budget do not have real au-

tonomy, particularly when the budget follows the current downward trend”⁹. By reconciling advertising with state resources, Cifuentes seeks to avoid the disadvantages each of them carries. Also, this is the hybrid perspective adopted by São Paulo's TV *Cultura* (Padre Anchieta Foundation), one of the most important radio and TV stations in Latin America.

However reasonable this strategy might seem, the argument introduced earlier should not be forgotten: when the budget depends on advertising revenue the public broadcaster's very *raison d'être* is eventually eroded, ending up likening a commercial broadcaster. As we already mentioned, a public broadcaster that accepts advertising as a means of funding tends to adopt market criteria in programme evaluation to attract a wider audience. This damages its function as a differentiated broadcaster: instead of standing apart from the logic of the entertainment industry, it ends up taking part of this industry.

But the issue is not simple. In France, a sector of society demands a ban on commercial advertising in public broadcasters for a long time, in an effort to make them more similar to the BBC and offer the French a more purely public alternative that could differentiate itself from TF1, a private network. In 2008 Sarkozy's government announced the decision of banning commercial advertising from public broadcasters. The income lost through this initiative would be compensated with state funds. But instead of praise, this initiative gave rise to criticism: it was read as an effort to weaken public television, that would then become much more dependent on the government¹⁰. When this document went to print almost 40% of the French FR2 came from advertising, as was the case with the Italian RAI and the Austrian ORF. In the case of the Portuguese RTP and the Spanish RTVE, advertising accounted for more than 50% of their income¹¹.

7. PORTALES CIFUENTES, D. “Televisión pública en América Latina: crisis y oportunidades.” In Omar Rincón, *Televisión pública: del consumidor al ciudadano*. Bogotá, Convenio Andrés Bello, 2001, p. 134.

8. *Ibíd.*, p. 111.

9. *Ibíd.*, p. 134

10. BENSON, R., and POWERS, M. *Public Media and Political Independence: Lessons for the Future of Journalism from Around the World*, p. 31.

11. 2007 data, from the European Audiovisual Observatory and quoted in PICARD, R. “The Economics of Plurality: Europe and the USA Compared.” In Tim Gardam and David Levy, eds., *The Price of Plurality: Choice, Diversity, and Broadcasting Institutions in the Digital Age*, Oxford, Reuters Institute for the Study of Journalism/University of Oxford, 2008, p. 201.

To sum up restricting access to commercial resources may increase state dependence. It may also affect the quality of the services, because the budgetary constraints faced by the public sector around the globe may lead to budgetary cuts. On the other hand, public broadcasters with access to the advertising market benefit from an advantageous situation over their commercial competitors, and their philosophy may be influenced by the market. This is apparently one of the two biggest dilemmas of public broadcasting funding.

After analyzing the public broadcasters of fourteen democratic countries, Benson and Powers found four main attributes for public broadcaster autonomous and optimal functioning. It is no coincidence that three of them are related to funding¹².

1. In several countries, funding is established for multiyear periods, lessening the capacity of the government to directly link funding to either approval or disapproval of a particular programme.
2. Public media seem to be strongest when citizens feel that media are responsive to them rather than to politicians or advertisers. Funding structures (user fees) and oversight organizations foster citizen engagement and accountability.
3. In these countries the legal framework establishing public broadcasters emphasizes mandates to provide high-quality programming, and inclusion of a wide variety of opinions. The laws also seek to restrict government influence in programming by introducing technical criteria for funding.
4. Oversight and/or administrative agencies or boards exist in all these countries to serve as a buffer between the public broadcasters and the incumbent government. The independence of such agencies or boards is also protected.

1.7 Ethics, Aesthetics, and Quality

To conclude this brief introduction we will now recapitulate the main ideas. As we have seen, public broadcasters are useful in the public space of a

democratic society because they contribute to opening new perspectives and approaches that generate ideas, information and cultural expressions. They offer alternatives that would not exist if societies had a broadcasting system only dependent on profit. Also, public broadcasting exists to protect the public space from colonization by the economic power, to serve as a buffer to counterbalance the existing forms of communication in the public space. But this does not mean that public and commercial broadcasters are rivals or enemies: each system complements the other. Democracy cannot exist without commercial communication and twentieth century experience shows that the social patterns of information improve with good public broadcasters.

Thus, the quality of the services broadcasters can offer is directly related to how clear their mission is. A truly clear and public mission should be handled through legitimate, legal and transparent procedures, liable for public accountability. Also, it is essential that they are independent. Accordingly, public broadcasting's legal status (and its effectiveness) not only affects the quality of the services rendered: most of the time it *determines* this quality. This is why quality should also refer to management quality and guarantee of independence, because the production, creation, and diffusion of quality content derive from these two attributes.

Hence, in the field of public broadcasting, the ethics of social communication competes with aesthetic quality. As we already mentioned, because no indicator can measure the quality of a work of art, in this document we do not seek to formulate measurements to say whether a program is level A, B, or C. This would be meaningless, if not authoritarian. But there is no doubt as to the direct connection between impersonal, transparent management patterns and the quality of the service, that in some cases can be considered part of the aesthetic quality. These can be measured with indicators, as we will show later.

Finally, the changes in technological patterns point at a possible increasing obsolescence of electromagnetic waves, as the primary means for audio and video signal diffusion. Hence, in the future,

12. BENSON, R., and POWERS, M. Public Media and Political Independence: Lessons for the Future of Journalism from Around the World, pp. 12-13.

state broadcasting frequency allocation could also become unnecessary. One of the several hypothesis argues that radio and TV broadcasters will broadcast directly through the Internet, rendering state allocation pointless. This is a real hypothesis for a situation already ongoing. Another hypothesis for an ongoing situation points at channel propagation through the digital broadcasting of radio and TV signals. This could allow a significant growth in the number of stations within the same region. New technologies will also give rise to adaptations

and changes in the broadcasting regulatory frameworks. Certainly, public broadcaster management should pay attention to this progress. However (and here lies the cornerstone of our argument), none of these changes should alter the public broadcaster's quality patterns of communication and services. Nothing will change their function in the field of information, cultural life and critical education of the citizens. We strongly believe that new technologies neither render quality indicators pointless nor invalidate their application methodology.

2. Preliminary Concepts

Let's begin by defining the main attributes of the concept we deal with in this document, particularly if we consider the indiscriminate uses of the term "public broadcasting." (The term has been used to describe both state radio and TV networks controlled by dictatorships –not strictly public, as they are not controlled by society but by oppressing tyrannies–, and the experience of pirate broadcasters –equally not public because they operate outside the democratic law.) Our basic assumption is that a public broadcaster belongs to the public and is managed according to public, non-state criteria, as we will see in this chapter¹³.

State-owned broadcaster (radio or TV):

- First and foremost, under a democratic regime *all state-owned broadcasters are public*, must be public and be managed as public goods. However, not all public broadcasters are state-owned, and, in fact, they *do not need to be state-owned*. Regarding the first requirement, that *all state-owned broadcasters are public*, it is worth noting that in a democracy, a state-owned broadcaster that is not at the service of the public is out of the question. As any other state entity that is directly or indirectly connected with public administration, the state-owned broadcaster should be guided by universally acclaimed principles such as morality, legality and impersonal-

ity—which renders illegitimate all efforts toward meeting personal, party, family, commercial, or religious interests. A state-owned broadcaster is not—should not be—a party propaganda broadcaster, set on defending the electoral interest of the government in power. Under the rule of law, a broadcaster guided by such principles is against the democratic principles of a free society. In other words, state-owned broadcasters must be public, must serve a public purpose, should not be partisan and should be impersonal. Having made this first point, we can now move to delimitating the definition of a state-owned broadcaster. In this document the definition of a state-owned broadcaster will be used to methodologically distinguish between broadcasters owned by or bound to the state—that are, strictly speaking, public, as in democracy all public administration entities are public—from public broadcasters with no direct or indirect administrative tie to the state. Hence, the definition of a state-owned broadcaster should have attributes: ownership and legal nature of the broadcaster, which binds it to the state, compliant with the country's public administration legislation; daily management, under the authority of one of the three branches of government; and restricted programming, resulting from the first two requirements and making these broadcasters more subject to the dissemination needs of

13. Luís Armando Badin's critical reading was essential to develop this topic. Dr. Badin (PhD in Law, University of São Paulo) should not be held responsible for any possible mistakes made in this document. On the contrary, he has contributed most of the accurate insights.

the state than able to freely reflect the debate and the cultural diversity generated in the typical non-state dynamics of social life.

- **About ownership and legal nature:** the state-owned broadcaster is state property, because it is legally defined as a public (i.e., state) company. This is the case with the Brazilian EBC (*Empresa Brasil de Comunicação*), owner of TV Brazil, or because it is part of the public administration (the case of *TV Justiça*, part of the Brazilian Supreme Federal Court, or *TV Câmara*, part of the Brazilian Chamber of Deputies).
- **About management:** directors and officials in state-owned broadcasters are appointed by bodies from one of the three branches of government. Thus, they are not independent from state power.
- **About programming:** state-owned broadcasters are subject to limitations that are dependent upon the approval or consent of a state authority. Even if content shows some level of diversity, plurality or criticism, parameters are *limited by an external authority*—i.e., external to the broadcaster because that authority is not part of the broadcaster's staff but belongs to a state organ that externally controls the broadcaster.
- **The government broadcaster:** this is a specific kind of state-owned broadcaster. It has an administrative tie with the Executive branch that entails subordination, be it conspicuous or not.
- **The legislative broadcaster:** a state-owned broadcaster directly connected with a chamber of the Legislative branch (federal, state/provincial, or municipal/local).
- **The judiciary's broadcaster:** a state-owned broadcaster directly connected with the judiciary.

Public broadcaster (radio or TV):

- According to the conceptual framework used in this document, a public broadcaster can be defined by the following attributes: first,

by its ownership and legal nature, the public broadcaster is *neither* directly bound to the state compliant with the country's public administration legislation, nor a commercial company, as it is not a for-profit organization and is not funded by the advertising market. As a general rule, the public broadcaster *does not broadcast advertisements* and, in that market, it does not compete with commercial broadcasters. Second, its funding is public, i.e., it is sustained on regular funding from the state or from society. The latter may come from license fees or voluntary donations. In our formulation the key is that these resources are protected by law, so that public authorities cannot reallocate them for other purposes, and that they cannot be made conditional to the discretion of a public officer. Also, the law must clearly establish the absence of a connection between the public broadcaster and any and all external authorities. It is worth noting that the boards of curators, which usually include members of the community and of institutions such as universities, are internal bodies of the public broadcaster. The public broadcaster is not put at risk by boards or community representatives in these boards, but by the tacit, legal or informal subordination to an Executive, government or state authority of any sort. The public broadcaster should not offer any kind of political compensation for the resources received from state powers. What must be clearly understood is that the daily management of a public broadcaster is not subject to the authority of none of the three branches of government, and its programming is not limited by any external authority. To further develop these ideas.

- **About ownership and legal nature,** the public broadcaster may be a Public Interest Civil Society Organization (OSCIP in Portuguese), a legal entity included in Brazilian law, or a private law foundation, as long as there are provisions for verification and oversight mechanisms carried out by the state and the citizens. Although the state has an oversight responsibility, it should not run the public broadcaster.
- **About management,** the top authority in a public broadcaster is an independent board

composed of members of the community. These members may be appointed by state bodies (which, with some variation, is a common practice among several public broadcasters from around the world). But board members do not owe obedience or allegiance to the rulers. They must enjoy express and verifiable mandates and autonomy. The board's composition must be plural—according to different criteria including partisanship, although it should not be a mere party proportional representation, which would just be a coarse extension of a legislative logic—and must stand out for the inclusion of people renowned for their wisdom, intellectual autonomy and ethical behavior. The board is responsible for the selection and appointment of the chief executive officer, who, in turn, and to manage autonomy, will appoint the team under his leadership.

- **About programming**, regarding methodology there are two conceptual requirements. First, even in cases of low-quality programming it must be defined and broadcasted in a clearly autonomous way, free from any kind of approval or consent by an external authority. Second, true public programming (in the sense used here) must be guided by values, principles and goals that prioritize: diversity, language experimenting, critical and independent information, concern for the education of

autonomous citizens, and lack of any kind of commercial, partisan, government or religious purpose. These parameters and others we will introduce later define the public broadcaster.

- Within this document **the community broadcaster** is a subspecies of public broadcaster with a smaller geographical scope. The community broadcaster has to be public—i.e., it must not have a commercial purpose or profile, and it must not be state-controlled. Given these two preconditions, a community broadcaster may adopt countless composition schemes and orientations. Variation is as broad as human communities are diverse.

An additional observation: in its progress, a state-owned broadcaster may reach a high level of editorial and administrative autonomy owing, in part, to the support of the society that legitimates it. In this cases, good state-owned broadcasters may develop a public service vocation in such a degree that they may seek total independence from state power. Likewise, an institution that approximates the formal definition of public broadcaster may show, in programming and management, a voluntary or agreed subordination to a government or a power group. The definitions introduced in this document should serve more as lights that illuminate the debates than straitjackets that attempt to define reality. While these concepts are more or less ideal types, reality is made of hybrid organisms.

3. Guidelines for Indicators Development

Quality indicators for public broadcasters are useful when:

- a. Sectoral public policies are based upon them;
- b. They provide objective criteria and impersonal mechanisms for citizen participation in the evaluation of the behavior of public broadcasters and their management;
- c. Internally, they are the premise for the performance evaluation of public broadcasters' teams, departments, and officers;
- d. From this starting point, we have defined 188 indicators formulated as direct questions that allow an objective and systematic evaluation of the broadcaster's acceptability. These indicators have been classified in the following ten areas:

- Management transparency
 - » Mission and purpose of the company or institution
 - » Resource administration
 - » Quality of dialogue with society
- Cultural diversity
- Geographical coverage and platform offer
- Public pattern (democratic and republican) of journalism
- Independence
- Premises for independence
- Independence of broadcasters' line operations

- Interaction with the public
- The public nature of funding
- Audience satisfaction levels
- Language experimentation and innovation
- Technical standards

Two groups of indicators complement each other. The first group of indicators should be undertaken with simple administrative data and without subsequent evaluations. For instance, the *management transparency* indicators belong to this first type. The second type requires more complex analyses that involve some level of value judgment. So, when seeking to make these indicators more objective, a panel of independent specialists and critics could be created to conduct regular evaluations of language programming, technical requirements of production, teams and their work, relationship with the audience, etc. Hence, the panel of specialists would provide guidelines and comments about the various requirements assessed. *Language experimentation and innovation* indicators belong to this second group. It should be noted that in some cases the two types of indicators may be combined¹⁴.

The following is an example of the method of application for the first type of indicators. For each question there is a set of possible answers, and each answer receives a score from 1 to 5. These indicators could be applied as follows:

14. For the indicators on audience satisfaction levels we have benefited from the contribution of sociologist Fátima Pacheco, a researcher specializing in opinion polls, with a strong professional background in the Padre Anchieta Foundation (the state of São Paulo's network, *TV Cultura*). An interview with Ms. Pacheco served as a guideline for this area. However, the authors bear the sole responsibility for any errors incurred in this document, most achievements resulting from her contribution.

Are balance sheets regularly published?

Answer	Indicator
Yes, very frequently	5
Yes, somewhat frequently	4
Yes, frequently	3
Yes, rarely	2
No	1

At the end of the process for each set of indicators a regular geometric shape is drawn within a circle. The difference between the area of the latter and the former would show the relationship between the values under study and the maximum values. The smaller the difference, the closer the indicators will be to the ideal values.

3.1 Management Transparency

The higher the level of transparency, the better equipped is the institution to offer a quality public service. Only in a transparent environment is society able to participate in management and, particularly, to oversee it. We understand transparency as the free circulation of information about the entity's administration in such a way that the data is easily understandable and accessible, and is expressed in ordinary language. Hence, publishing the annual balance sheet is not enough: it should also be explained. Disseminating the relevant data allows the public to really know the broadcaster and gain a detailed intelligence of the way public resources are being used.

A. MISSION AND PURPOSE OF THE COMPANY OR INSTITUTION

- The broadcaster's mission, values, aims and vision expressed in an official document that serves as a guideline for cultural action?
- Did the public officers participate in the development of those foundations?
- Are those foundations regularly revised and updated in internal meetings with a high level of participation?

- Are the mission, values, aims, and vision truly at the service of the citizens?
- Apart from these foundations, are there general programming guidelines for the different broadcasting times and audiences?
- Are these guidelines widely known, so that the audience can verify the purpose of each programme or group of programmes?
- Does each programme have a specific mission?
- Are these a matter of public knowledge?
- Are there programming criteria?
- Are these a matter of public knowledge?
- Is there a board responsible for these criteria that may evaluate whether they are being complied with by the institution's executive management?
- Is the appointment of board members transparent?
- Are there criteria for team evaluation?
- Are there editorial goals to evaluate the performance of public officers?
- Are these a matter of public knowledge?
- Is there an internal organ that regularly evaluates contents?
- Are these evaluations open to the public, even if they are disclosed a posteriori?
- Are there clear and public criteria for the appointment of the broadcaster's executive officers?
- Is there a professional career plan?
- Is the broadcaster career plan systematically followed?

B. RESOURCE ADMINISTRATION

- Are balance sheets regularly published?
- Are they clearly expressed in informal language or they can only be understood by accountants?
- Are balance sheets audited by external, independent agencies?
- Are balance sheets subject to internal auditing following the same parameters used by the external auditors?
- Is the budget annually published, with a clear indication of how each section is meant to be used?

- Are predetermined criteria for resource use a matter of public knowledge?
- Are there regulations, manuals or guidelines to determine the cost of the produced or acquired content?
- Are these made available or explained to the public?
- Are detailed programming costs published?
- Is the cost of each programme clearly shown at the end credits?
- Can citizens know the cost of each programme?
- Are there vendor registration criteria?
- Are values sustaining those criteria—i.e., sustainability, decent work relationship, etc.—widely known?
- Are these criteria applied and their compliance audited?
- Are directors' wages a matter of public knowledge?
- Are the directors' expenses and benefits a matter of public knowledge?

C. QUALITY OF DIALOGUE WITH SOCIETY

- Can the citizens introduce criticism or make suggestions about the balance sheets, the budget and the resource administration?
- Is citizen participation promoted?
- How are the suggestions received by the institution?
- How does the institution answer to those suggestions?
- Are there objective criteria for citizen participation in the evaluation process?
- Are there Internet-based questionnaires that citizens may complete if they wish to participate?
- How is audience participation internally assimilated and spread?
- Is there an ombudsman or somebody who defends the audience?
- Does he or she have a daily space where audience criticism can be discussed?
- Is there any means for interaction with the audience in newscasts?
- Is there adequate funding for efficient interaction with the audience?

- Are there files with the audience's comments and letters?
- Are responses given within reasonable time?
- Is there interactive communication with viewers or listeners who wish to discuss programming or editorial decisions?
- Does the broadcaster have a permanent presence in the social networks?
- Does the broadcaster have its own webpage in the social networks?
- Do all programmes in the grid have their own webpage in the social networks?

3.2 Cultural Diversity

We understand cultural diversity in a public broadcaster as the need to have a policy and a daily practice of respect for diversity that ensures internal diversity, both in work relations and in broadcast programming. It is essential that, in programming, cultural diversity is not mistaken for simply educational aesthetics aimed at spreading good manners or promoting a civic education, because such is not the function of a public broadcaster. Neither does cultural diversity mean an uncritical acceptance of the politically correct. We believe a solution to diversity is not reached by quotas: on the contrary, cultural diversity is strengthened when programming includes different voices, angles, and viewpoints that reflect social life. Transforming the programming grid in a federation of quotas does not solve the problem. Cultural diversity is not adequately reflected if, for example, we divide Sunday programming in schedules proportional to the number of members of each religion in the city where the broadcaster is and offer each a time slot to develop their activities. On the contrary, the public broadcaster must try to build bridges between religions in common time slots, and seek insights, comparisons and a critical and autonomous education of the audience. Cultural diversity should not be sought through patronizing contents, but a true polyphony that reflects the richness of social life. Accordingly, particular attention should be given to the weakest cultures and cultural expressions.

- Are there programmes for audiences of different age groups?

- Are there programmes for audiences of different geographical regions?
- Does the programming grid reflect the different ethnic, religious, popular, age, sexual orientation, and aesthetic identities in that society? (It should be noted that “reflecting” does not imply “imposing” a series of attributes or quotas artificially defined).¹⁵
- Does programming aim to protect cultural expressions that are “threatened with extinction,” to help preserve the intangible heritage?
- Are there guidelines or a manual on diversity?
- Are these guidelines or manuals applied in practice?

3.3 Geographical Coverage and Platform Offer

In this document indicators on geographical coverage and platform offer help to evaluate whether the public broadcaster achieves its goals regarding spatial coverage. In this sense, the key is that broadcasters give back a useful service to the community that sustains them, making it feel represented in programming. Thus, for example, in the case of municipal broadcasters, their ability to reflect all local human areas should be evaluated. Broadcasters in specific states or provinces should be able to reflect their area’s diversity, and national or binational broadcasters should deliver a service to the entire population that supports them. Although geographical coverage may exceed the region that funds the broadcaster, provided that the regional public interests are reflected quality should be primarily confirmed in relation to the return offered to paying citizens.

- Can the station be tuned in the entire territory where paying citizens live?

- Does the broadcaster have facilities and equipment in all the regions where funding comes from?
- Does programming reflect the geographical diversity it should represent?
- Are the inhabitants of all regions included in programming? Do people from different regions appear in the broadcast programmes?
- Are there journalist reports about the different cities or regions?
- Are cultural productions from the different regions providing funding broadcast?
- Are there broadcaster offices or agents in the different regions?
- Is the cost of those agents justified in terms of productivity?
- Has the broadcaster signed agreements with other national public broadcasters?
- Has the broadcaster signed agreements with other international public broadcasters?
- Are there digital channels?
- Are they freely accessed?
- Can electromagnetic wave signals (from radio stations and over-the-air TV) be tuned in throughout all the geographical area the broadcaster should cover?
- Are there closed-circuit TV channels that broadcast the programmes?
- If these channels are paid, can the reasons for keeping them be justified? (Remember that public broadcasters should be free and universally accessed.)
- Does the broadcaster have one or more Internet web pages?
- Does the broadcaster have applications for mobile devices?
- Does the broadcaster have a clear policy on the use of new technologies and keeps up to date in this area?

15. Regarding this requirement, artificial solutions such as quotas should be avoided. These would simply transform the programming grid in a federation of diverse minorities devoid of identity, whereas the identity of the public broadcaster should be plural and universal. Accordingly, reflecting diversity does not mean assigning time slots to several interest groups: it means making social diversity visible, from the broadcaster’s viewpoint, and giving a voice to the different social sectors without changing the programme identity. Public broadcasting programming is a way of developing diversity, not a simple federation of subsidiary broadcasters distributed among the alleged quotas. In this sense, the public broadcaster should reflect and not be subject to diversity. Public broadcasters give a voice to the different identities and make them visible, showing the whole picture without relinquishing their inalienable condition as mediators in the communication and circulation of ideas. In sum, quotas do not solve the problem. Also, public broadcasters cannot indulge in simply ignoring a sector of society: their quality depends on their constant representation of all sectors of society.

- Does the broadcaster have a collaboration policy with other public broadcasters around the globe?

3.4 Public Pattern (Democratic and Republican) of Journalism

We need a specific item to evaluate journalism, for a very simple reason. There are different kinds of public broadcasters. Some are educational, with a mission to further school or technical education. Some of them serve to disseminate public administration services (e.g., legislative chambers). Others are mainly focused on children's programming. The list is virtually endless. But all these broadcasters share a common attribute: they exist to offer access to public interest information and to culture (in a broad sense) to the citizens. Hence, all public broadcasters are media organizations, as they directly or indirectly carry out journalistic activities, bringing information to the public at large and promoting a debate on ideas—sometimes successfully, other times in a somewhat biased fashion. It is no coincidence that a new public broadcaster always includes the mandates to mediate in public debates and, particularly, to protect them from harmful or foreign interests. This means that public broadcasters carry a journalistic calling in their DNA, even when understood in a broad sense. So regardless of the focus of the broadcaster, the quality of their journalistic role should be evaluated. We understand journalism as all information about facts that is prepared, edited or disseminated by the broadcaster. A documentary is journalism. A programme where ideas are debated is journalism. A news reporting programme is also journalism. Hence, we use the term 'journalism' in a broad sense. This triggers the following questions: Does the press coverage of the broadcaster include the population that supports it, either as an audience or as the main characters in the stories told? Is the press coverage really nonpartisan? (In this case it is worth remembering that attitudes that attempt to benefit the incumbent government are also deemed partisan.) Is journalism truly secular and does it comply with public service republican and democratic standards? Given that journalism is intrinsic to all public broadcasters, these require-

ments should also be subject to verification when quality is evaluated.

- Is there a predefined set of newscasts?
- Does the newscast cover the entire geographical area covered by the broadcaster?
- Does the newscast regularly and thoroughly deal with criteria produced in the different locations of the area covered by the broadcaster?
- Are the citizens and the communities that support the broadcaster the main characters of the news, coverage, documentaries and debates broadcast?
- Are unnoticed errata in press reports or newscasts widely acknowledged?
- Does the broadcaster make a public acknowledgement when proselytist content or political belief disguised as journalism is inadvertently broadcast in press reports or newscasts?
- Are there clear guidelines for editorial standards that seek to avoid religious proselytism disguised as a cultural documentary (e.g., broadcasting ceremonies from a certain religion)?
- Are these guidelines successful in avoiding religious proselytism?
- Are all points of view included when ideas are debated?
- Is journalism objective—i.e., seeking to avoid subjectivity—and independent? (see next question)
- Do the sources included in reporting represent the diversity standards that guide the broadcaster's general programming?

3.5 Independence

The concept of independence encompasses three interrelated areas: financial independence, administrative independence, and editorial independence. Financial independence is achieved with legal mechanisms that guarantee that public funds are provided regardless of the government's will or humor. Administrative independence means that the broadcaster is able to make autonomous executive decisions without being made subject to external authorities in their daily administration (a similar case would be university autonomy). Finally, editorial independence is a subspecies of adminis-

trative independence: it guarantees that the choice of programmes, teams and journalistic guidelines shall be a matter of internal decision, and in no case made subject to the approval of external authorities (notice the particular use of the term “authorities”).

A. REQUIREMENTS FOR INDEPENDENCE

- Is there an Editorial Board—or an analogous body—independent from the government and/or the state organ and/or the government with which the broadcaster may be eventually connected?
- Does the Board have its own regulations?
- Have those regulations been published and are easily accessible to the citizens?
- Are regulations written in a simple, direct and easily understandable language?
- Are the Board’s powers defined in a law or other legal document?
- Are the Board members appointed without government participation?
- Does the Board have the power to appoint the broadcaster’s highest executive officer?
- Does the highest executive officer have a specific mandate?
- Does he or she have the power to hire and dismiss advisers or supervisors?
- Can the Board dismiss the highest executive officer?
- Does the Board approve the company’s annual plan?
- Does the Board approve the company’s budget plan?

B. INDEPENDENCE OF LINE OPERATIONS

- Once the annual plan has been approved, can the broadcaster define the programming grid with autonomy?
- Does the broadcaster enjoy total autonomy to hire officers?
- Does the broadcaster enjoy autonomy to manage its teams?
- Does the broadcaster enjoy autonomy to call for tenders?
- Does the broadcaster enjoy autonomy to choose partners?

- Does the broadcaster enjoy autonomy to produce programmes?
- Do the journalists enjoy autonomy when participating in programmes and/or newscasts?
- Are there independent auditing and criticism bodies within the institution?
- Is there an independent panel of renowned specialists that constantly and regularly evaluate programme content?
- Is the broadcaster free to decide which content is aired or included in programming, without being made subject to state censorship?
- Does the broadcaster enjoy total autonomy to decide what to broadcast (or is it dependent upon the government’s authorization)?
- Are the broadcaster’s web sites free from government or judicial restrictions?

3.6 The Public Nature of Funding

By definition, public broadcasters must be independent (see the previous section), vis-à-vis political power—mainly the state—and economic power—i.e., the market. Accordingly, if the public broadcaster is funded with public money, legal protection against the state administrators of these resources is required. On the other hand, if the broadcaster is funded with advertising, it is necessary to guarantee that it will not be made subject to the market’s demands—which can be achieved when only accepting institutional advertising (not directly “selling” goods or services) and compliant with public rules that stop the advertiser from having a say in programming. Although this is not simple, it can be achieved. Public broadcasters exclusively funded by the advertising market will have great difficulty fulfilling their functions, as they have been outlined in this document. Funding should be public and compliant with public regulations.

- When funding is public, is there a law defining forms of funding?
- Does the law hinder government interference with resource allocation?
- Is the broadcaster protected from contingency and other forms of government pressure?
- Are there funding programmes that involve the public’s direct and voluntary participation (according to the PBS model in the US)?

- When ordinary advertising is broadcast—selling goods or services such as cars or credit cards—, does the broadcaster keep that income below 20% of its total budget?
- Does the broadcaster have official rules to restrict the amount of commercial advertising?
- If the broadcaster only airs institutional advertising, are there regulations that hinder advertiser interference with programming decisions?
- Does the funding department clearly avoid influencing or interfering—or saying it influences or interferes—with the area in charge of making editorial decisions?
- Is the editorial department absolutely and clearly independent from the funding department?
- Is this independence made clear to the public, and is it published in an official document?
- Is the broadcaster well-known and well-respected?
- If the broadcaster's public officers were asked to answer an open-ended questionnaire, would they show clear knowledge of the need for that independence (between the funding department and the editorial area) and the way it works?
- Are processes of partner selection for programme production shielded from commercial or other criteria alien to the public's needs, hopes and rights?
- When talking to private partners or institutional advertisers, does the broadcaster know how to explicitly stand apart from commercial broadcasters?
- Does the broadcaster know how to avoid competition with commercial broadcasters when seeking partnerships or advertising?
- Given that commercial broadcasters cannot benefit from public resources, is the public broadcaster's management aware of the fact that such competition would be unfair?
- Does the broadcaster reject other forms of dissemination of commercial interests from companies or advertisers (public or private) in programming (such as merchandising)?

- Is the public aware of the relationship between the broadcaster's management and its advertisers?
- Is the public consulted about this relationship?
- Does the broadcaster seek the advice of the public about this relationship?

3.7 Audience Satisfaction Levels

Together with quantitative viewer ratings, essential for a quality analysis of the public broadcaster, opinion surveys should look for more subtle information that point to the public's degrees of loyalty and learning through programming, the level of esteem and the emotional bond established with the broadcaster. The audience is ultimately who should sanction or reject the broadcaster's behavior. For this reason, opinion surveys are essential.

- Does the broadcaster's budget include an item for opinion surveys?
- Are there polls for specific topics?
- Are there preliminary audience surveys before a programme is launched?
- Is there an audience tracking process?
- Does the broadcaster have a specific survey analysis area?
- Are programme ratings published?
- Is there an independent research department that serves all programmes broadcasted?
- Is there a feedback process regarding production?
- Is there an internal communication process regarding the survey results?
- Is there a process to criticize survey results?
- Is there an ongoing polling of the target audience of each programme?
- Is there an ongoing survey to measure the average time spent watching the broadcaster's programmes?
- Is the ratio of surveyed programmes to total programming adequate?
- Are the programme maintenance and quality adjustment systems efficient?
- Are there Internet-based questionnaires to assess the opinion of the public at large on the broadcaster's programming?

- Is the Internet used to further the public's choice of the broadcaster's programmes?

3.8 Language Experimentation and Innovation

Public broadcasters must strive for aesthetic innovation. Language experimentation and its dangers are inherent to the public broadcaster's raison d'être. As with the previous section, in this case also indicators can only be appraised through survey techniques (qualitative and quantitative) applied to the public and to specialized audiences.

- Is there a style manual that fosters innovation?
- Are all professionals familiar with the latest audiovisual production techniques?
- Do other broadcasters (public and private) believe the broadcaster has good ideas and good professionals?
- Are there programmes or formats developed by the broadcaster and later adopted by other broadcasters?
- Is programming exported?
- Is the broadcaster considered as a training site for beginning professionals?
- Is programming combined with other broadcasting platforms, such as the Internet?
- Compared with other competitors or similar broadcasters, is the technical staff updated and prepared to face the latest developments in the field?
- Compared with other professionals from the same market and region, are technicians at the forefront of technology?
- Are there groups of critics (assembled by the pollsters) that regularly serve as thermometers of the aesthetic quality of programming?
- Is programming language original or does it repeat well-known patterns?
- Do new programmes follow the basic premise of language originality?
- Is there a regular procedure for programme language analysis?
- Is there a clear procedure for this analysis?
- Is this analysis made by a panel of specialists that includes external specialists?

- Is there a regular feedback process for this analysis that reaches the programme producers?
- Does the broadcaster have programmes that are internationally considered benchmarks, vis-à-vis programmes in countries that share the same level of economic and educational development?
- Is there a programme that may be internationally considered a benchmark for a specific area?
- Does the broadcaster receive national awards with some frequency?
- Does the broadcaster regularly receive international awards?
- Do programmes serve to make specific talent known?
- Do the programmes reveal management talents that receive recognition outside the broadcaster?
- Do the programmes reveal journalistic talents that receive recognition outside the broadcaster?
- In general terms, can it be said that the broadcaster's programmes are a revelation in their specific areas?
- Do the independent press and the specialized critics believe the broadcaster's programmes have originality and aesthetic or cultural value?

3.9 Technical Standards

Undoubtedly, in radio and TV (and, now, also in digital) production there is the underlying anxiety for quality technical standards that are recognized both by the public and by professionals from the field, within and without the broadcaster. These technical quality standards are based on the teams of professionals, on having quality, up-to-date equipment, and on the broadcaster's ability to preserve productions in an organized and accessible way. Hence, we also include indicators to evaluate such standards.

- Is the equipment regularly updated, compared to the competition or other similar institutions in the same region?

- Is the ratio of new to obsolete equipment equivalent to the standards of other companies from the same area and from the same country?
- Are the technology investment standards in accordance with the best practices in the broadcaster's segment?
- Is the software used in the different stages of production state-of-the-art?
- Is there a permanent technical maintenance programme?
- Are professionals qualified to correctly operate the equipment?
- Are professionals regularly trained to correctly operate the equipment?

- Are the studios among the best available in the marketplace?
- Is the editing equipment among the most advanced available equipment?
- Is the image capturing equipment among the best available in the marketplace?
- Is the audio capturing equipment among the best available in the marketplace?
- Is the off-site equipment among the best, compared with other similar institutions?
- Is there an archive system for the material produced by the broadcaster (with the best available technological standards)?
- Is at least the best part of the production archived?

4. Conclusion

The final standards to evaluate a public broadcaster's quality cannot be reduced to metrics. They result from negotiated agreements and involve a complex element of intersubjectivity that, if taken to the extreme, is the same intersubjectivity that defines the nature of the public space and how political agreements and disagreements are reached. However, metrics are helpful indeed. Choosing to ignore them shows arrogance, hidden behind a mask of demagoguery or populism. On the other hand, pretending to transform metrics in the last word in a process that, being cultural, cannot be reduced to mathematics, would also be incurring in a technocratic error.

Inside that wide universe where culture and politics dialogue, culture could be deemed an extension of politics and politics an expression of culture, none totally free from the other, metrics offer an objective presentation of perceptions and a means to reduce (not delete) inaccuracies that are inherent to subjective perceptions. In democracy, metrics contribute to a more accurate understanding about what we agree and disagree. For this reason, metrics can be useful to a public broadcaster.

With this idea in mind, we have presented almost two hundred questions, grouped under different categories, that represent different perspectives—or even cross-sections—to evaluate public broadcasters. As we warned the reader in the first pages of

this document, those questions can be transformed into quantitative indicators using the formula we have introduced above. We believe that the most interesting aspect is the fact that indicators can be adapted. In a specific society, at certain moment, a group of indicators may be given more weight than the others. The way indicators are applied may not only vary according to circumstance: it must vary.

The key is preserving the general sense of the indicator logic. By this logic, political and financial independence in public broadcasters remains an essential premise for quality. However well technically crafted a programme may be, if it serves a dictatorship, it will not create the quality expected from a public broadcaster, because it will not be committed to citizen emancipation and the cause of democracy. At least in the case of public broadcasters, and even indirectly, aesthetics and ethics go hand in hand.

On the other hand, it is clear that some aesthetic dimensions mostly lay outside the sphere of ethics. Indicators should also account for this fact, and we attest to it. The key element to always remember is that public broadcasters should be clearly at the service of the citizens, of society, and not of power or the market. Hence, indicators should reflect this duty.

We hope to have contributed to this effort.

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