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INTRODUCTION

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Abstract / What is so special about small media systems? The following article touches upon their structural peculiarities, arguing that the small states perspective in communication science is not limited to Western Europe: small production and sales markets, dependence on and the high penetration with foreign media make the operation of domestic media organizations in small states more difficult. In some countries, this problem is intensified by giant next-door neighbours sharing the same language. The main claim of this article is that size has an impact on media regulation as well. It is suggested that small states, in order to protect and promote media diversity, are inclined to an interventionist approach of media regulation. They may even revert to protectionist measures undermining the goal of media diversity.

Keywords / communication science / diversity / Europe / media policy / media regulation / media system / small states

Analysing small media systems is not a new phenomenon. Small states were an important research topic in the late 1980s and the early 1990s, albeit research focused mainly on Western European countries. In the last 10–15 years, however, small states have almost completely disappeared from the research agenda. More recent examinations and typologies of media systems rarely consider size. One example is the well-known typology of Hallin and Mancini (2004), distinguishing the *liberal or North Atlantic model* (US, Canada, UK, Ireland), the *democratic corporatist or North/Central European model* (German-speaking, Nordic and Low Countries) and the *polarized pluralist or Mediterranean model* (France, Italy, Spain, Portugal, Greece). In all three models we can identify small states (Ireland in the liberal model, Portugal and Greece in the polarized pluralist model and all the countries aside from Germany in the democratic corporatist model). As valuable this typology is as a framework for analysing North America and Western Europe, it neglects the size of media systems. The same is true for research focusing on media systems and their transformation in Central and Eastern Europe. The frequently used category of post-socialist countries is blind to the issue of smallness too.

In this article it is argued that a small states perspective remains important for the analysis of media systems. This perspective is not limited to Western Europe but applies to countries across Europe and in other world regions as well. Small media

systems share some structural peculiarities that have implications for their media landscapes and that affect media regulation in small states. The first section broadens our understanding of small states by referring to research in political science, sociology and economics before discussing structural peculiarities of small media systems and their implications for the media landscape. How smallness may affect media regulation – specifically regulatory measures aimed at protecting and promoting media diversity – is touched upon in the second section.

Small States and Small Media Systems

Not surprisingly, there is no widely accepted *definition* of what a small state is. Mostly, an absolute measurement like geographic size, population or gross national product is considered. This absolute approach to smallness involves two difficulties. First, there is the problem of which criteria to use. Territory, population and economic indicators are often independent of each other. Thus, a small state may hold a top position in one or another (economic) variable. Second, the problem remains of where to draw the line between small and big states. This boundary will always be arbitrary (Baehr, 1975: 459; Christmas-Møller, 1983: 43; Mouritzen and Wivel, 2005: 3; Thorhallsson and Wivel, 2006: 654).

The attributive and the relational approaches to smallness offer an alternative (Geser, 1992: 629–31; 2001: 89–98). The attributive approach rests upon the perception of smallness (Thorhallsson and Wivel, 2006: 654). For instance, Keohane (1969: 296) defines a small state as one 'whose leaders consider that it can never . . . make a significant impact on the system'. However, the problem of operationalization is obvious (Baehr, 1975: 460; Christmas-Møller, 1983: 44). Finally, the relational approach defines smallness in relation to bigger and more powerful countries. Accordingly, the smallness of a state is not determined by some absolute measurement but by a state's position in a certain context or issue area (Mouritzen and Wivel, 2005: 3; Thorhallsson and Wivel, 2006: 654–5, 664). Defined in this way, even Canada can be a small state – at least compared to its bigger neighbour (Siegert, 2006: 194).

Despite the necessity to consider relational and attributive features of smallness, population size is a common and simple measurement. It is safe to assume that the size of a country's population not only influences the other substantial variables but relational and attributive dimensions as well (Geser, 1992: 631). Moreover, with respect to media systems, population size seems a useful indicator since it directly influences the size of media markets.

It is possible to distinguish between small states and microstates with a few thousand inhabitants. There exist quite a few of them (in Europe, for instance, Andorra, Liechtenstein, Monaco, San Marino and the Vatican). It is more difficult to decide on the upper limit (Abt and Deutsch, 1993: 22; Geser, 1992: 631; Waschkuhn, 1993: 10). For Europe, usually all countries aside from France, Germany, Italy, Poland, Romania, Spain and the UK are considered small states. Here, I follow Pelinka (2005: 175), who suggests using the term small state for countries with a minimum of 100,000 and a maximum of 18 million inhabitants. This range allows for the inclusion of the Netherlands – admittedly a giant among the small ones.

Small States between Economic Flexibility and Political Stability

The roots of small states research are not in communication science, however, but in political science and partly in sociology and economics. For a long time, research in political science focused on the lack of military power of small states with respect to their security and survival in international relations. Today, at least in Europe, this seems less relevant (Baehr, 1975: 258; Christmas-Møller, 1983: 36–7, 50; Thorhallsson, 2000: 5; Thorhallsson and Wivel, 2006: 654; Väyrynen, 1983: 100; Waschkuhn, 1991: 138; 1993: 8). Later research on the matter centred on politics and policy formation within small states (Klöti and von Dosenrode, 1995; Knudsen, 2002: 182). More recently, the role of small states in the European Union has been analysed (Goetschel, 1998; Hanf and Soetendorp, 1998; Thorhallsson, 2000). In addition to these political issues, economic aspects began to arouse interest as well (Christmas-Møller, 1983: 38): 'economic studies tend to focus on drawbacks, whereas the political ones focus on specific advantages' (Grisold, 1996: 487).

With respect to politics and policy formation, the importance of consensus built in circles of a small elite has been emphasized. The smallness of a country implies the smallness of its elite. A small number of persons not only facilitates *collaboration and consensus* but is also a strong incentive to avoid conflicts. Thus, the reconciliation of interests is of high importance in small states, which helps in explaining the existence of consociational or consensus democracy and democratic corporatism (Grisold, 1996: 487–8; Klöti and von Dosenrode, 1995; Pelinka, 2005: 173; Waschkuhn, 1991: 139;1993: 8).

From the economic point of view, dependencies of small states in the world economy are of interest. Rothschild (1993: 80–1) demonstrates that a small population involves not only higher production costs but also a smaller domestic sales market. These economic downsides can – at least partly – be overcome by export activities. However, a small home market does not allow for a complete self-supply but requires the import of goods (Waschkuhn, 1991: 139). This higher openness and interdependence in foreign trade (relative to big countries) results in a higher dependence on world markets and in a higher vulnerability regarding external disruptions. In sum, small states need to be *highly flexible on the economic side* (Grisold, 1996: 487; Pelinka, 2005: 173–4; Waschkuhn, 1991: 139). This flexibility, though, is not an independently chosen option but born out of the necessity to make the best out of dependency (Trappel, 1991a: 362).

Only a few attempts have been made to link the economic and the political perspectives. In his study *Small States in World Markets*, however, Katzenstein (1985: 29) argued that small states have succeeded in maintaining their economic flexibility 'by taking into account both the economic and the political requirements of rapid change'. Insofar as internal consistency constitutes a counterbalance to economic flexibility, the successful adjustment of small states to economic change is based on a *balance of economic flexibility and political stability*. Through a variety of economic and social policies they compensate for the costs of change with a solid welfare system (Grisold, 1996: 488; Hicks, 1988: 134–5; Katzenstein, 1985: 24, 29; Thorhallsson, 2000: 1–2; Waschkuhn, 1991: 152; 1993: 8).

For Katzenstein (1985: 30–7), *democratic corporatism* is the basis for balancing economic flexibility and political stability. Despite the important contribution his study made to the analysis of small states, the postulated equation of smallness with democratic corporatism should be re-examined (Hicks, 1988: 136; Thorhallsson, 2000: 234). First, while small states tend to avoid political conflicts in favour of consensus, democratic corporatism is not the only answer. In addition, his explanation of corporatism as a result of economic flexibility is considered the approach's weak spot (Thorhallsson, 2000: 234). Second, all the countries analysed match Hallin and Mancini's (2004) aforementioned democratic corporatist model. Katzenstein (1985: 21) excluded non-corporatist small states like Ireland and some Mediterranean countries from his study for practical and historical reasons. Third, his conception of corporatism is not widely shared (Hicks, 1988: 137). Big countries, e.g. Germany, may have a democratic corporatist tradition. While this critique does not diminish the value of Katzenstein's results for the countries analysed, one has to take into account that not all small states – not even in Western Europe – share the corporatist tradition. Additionally, commercialization, globalization and digitization, bringing new actors to the stage, have the potential to change policy-making in corporatist countries (Trappel, 1991a: 363). Hence, I argue that particularly the economic realities in small states (i.e. the small domestic market limited by population size) are of importance and have implications for the media system. This dissociation from corporatism allows for extending the scope of the small states perspective to countries outside Western Europe.

Structural Peculiarities of Small Media Systems

Small states have small media markets. Given that media markets are language markets, media markets are even smaller in countries with different language communities (e.g. Switzerland or Belgium). Generally, four structural peculiarities of small media systems can be distinguished (Bonfadelli and Meier, 1994: 71–2; Humphreys, 1996: 188–9; Meier and Trappel, 1992: 130–5; Puppis, 2007: 109; Siegert, 2006: 195–6; Trappel, 1991a: 358–63; 1991b: 26–34, 250–3, 269–72):

1. *Shortage of resources:* Small media markets face limitations on the production side. Shortage of resources occurs not only with respect to capital, but also with respect to know-how, creativity and professionals in the media. This impedes the successful establishment of a domestic audiovisual industry.
2. *Small audience markets and small advertising markets:* Small media markets are also limited on the sales side (advertising and audience). While the production costs are roughly the same in small and in big markets, audience markets in small states are too small to realize economies of scale. This results in very costly media production. Additionally, the small size of the audience sets limits to the revenues realized from advertising (despite high advertising expenditures per capita). Export does not offer a solution either because media productions from small countries are too culturally specific (Burgelman and Pauwels, 1992: 173).
3. *Dependence:* First, small media systems are strongly affected by developments

like commercialization or globalization but are less able to influence these developments than big countries. Second, political decisions of bigger neighbour states and the EU tend to influence the media systems and the media regulation of small states without taking their peculiarities into account. Media regulation in small states is therefore judged as rather reactive and as relying on ad hoc decisions instead of deliberate strategies (Meier and Trappel, 1992: 141; Trappel, 1991b: 37). One example often referred to is the liberalization of broadcasting markets: 'Victims of the wide scale "imported deregulation", in fact, most small countries, bowed during the 1980s to the inevitable and introduced their own deregulation and liberalisation designed to encourage a response from indigenous commercial interests' (Humphreys, 1996: 189). Domestic private television was thought to defy foreign channels – a goal obviously in conflict with economic realities. The liberalization was heavily criticized for devaluing public service: 'it is our conviction that a small country can only viably affirm its audiovisual identity and produce quality programming by defending the role of public service' (Burgelman and Pauwels, 1992: 174).

4. *Vulnerability:* Small media systems are vulnerable in three different ways. First, there is a threat of foreign takeover of media companies, implying a declining domestic influence over the media (Siegert, 2006: 196; Trappel, 1991a: 361). Second, national media tend to conform to foreign media. And third, foreign media products are present in the media markets of small states. This is true for the press, but especially for broadcasting: National sovereignty in broadcasting is vulnerable due to the overspill of foreign television channels via satellite and highly developed cable networks (Burgelman and Pauwels, 1992: 173).

Small production and sales markets, dependence and the high penetration with foreign media obviously have implications for the media landscapes of small states. Together, these structural peculiarities complicate the maintenance of a local media culture. The production of indigenous programmes and of content referring to national peculiarities lacks resources and is difficult to refinance due to restricted sales potentials and competition from abroad. This is seen as a threat since foreign channels do not deliver a domestic perspective. Multicultural countries are especially concerned with the effects of a strong orientation towards foreign media for national cohesion (Bonfadelli and Meier, 1994: 80–1; Siegert, 2006: 200, 204).

The Impact of Giant Next-Door Neighbours

The implications for the media system are reinforced in small states with a giant next-door neighbour who shares the same language (Grisold, 1996: 489; Puppis, 2007: 109; Siegert, 2006: 198–9; Trappel, 1991a: 363–5). Some small states share the same language or languages with their giant neighbour(s) (e.g. Austria, Belgium, Ireland, Luxembourg and Switzerland). Language can protect small states from foreign influence or degrade them to being part of a larger (foreign) media market. In small states with giant neighbours foreign channels achieve high market shares whereas domestic channels from other language regions are insignificant. In some

small states, offshore operations circumventing domestic regulation (e.g. TV3 in Scandinavia and the Baltic states) or channels from neighbouring countries with closely related languages are controlling a part of the market. In big countries and in small states featuring an exclusive language (e.g. Finland, Greece, Hungary or Portugal), however, their presence in negligible (see Figure 1).

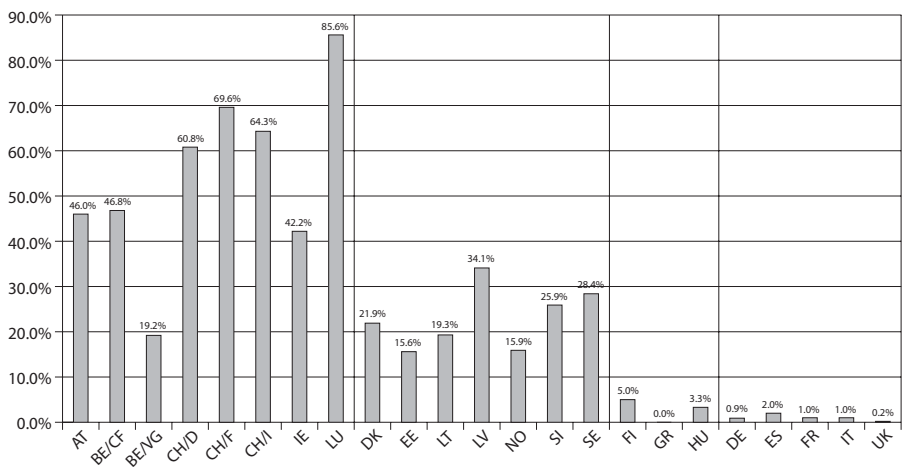
The strong position of foreign channels involves fierce competition for domestic public service broadcasters and commercial channels alike (Bonfadelli and Meier, 1994: 82–3; Puppis, 2007: 110). The foreign programmes are strong rivals, endowed with a higher budget than any domestic station. Competition is not limited to audience markets. Advertising revenues flow out to commercial broadcasters abroad as well (mostly without them producing specific programming for the small states), causing tough conditions for the formation and the existence of domestic private broadcasters.

Media Regulation in Small States

The presence of foreign media in small states has an immediate effect on domestic public and private broadcasters and is often perceived as a threat. Thus, it can be

FIGURE 1

Audience Market Share[a] of Foreign Television Channels, 2004



[a] Data refer to the whole day not just to audience share during prime-time.

Source: European Audiovisual Observatory (2005: 68) and, for the Austrian data, Medienforschung ORF (2006).

Key: AT: Austria; BE/CF: Belgium/Wallonia; BE/VG: Belgium/Flanders; CH/D:Switzerland/German-speaking region; CH/F: Switzerland/French-speaking region; CH/I: Switzerland/Italian-speaking region; DE: Germany; DK: Denmark; EE: Estonia; ES: Spain; FI: Finland; FR: France; GR: Greece; HU: Hungary; IE: Ireland; IT: Italy; LT: Lithuania; LU: Luxembourg; LV: Latvia; NO: Norway; SE: Sweden; SI: Slovenia; UK: United Kingdom.

assumed that this situation influences media regulation as well. In the following I focus on regulatory measures aimed at protecting or promoting media diversity.

Media Diversity as a Key Objective of Media Regulation

Media diversity 'constitutes one of the key objectives in the name of which arguments are made in both theoretical and political debates' (Karppinen, 2006: 53). Diversity helps securing important democratic values (van Cuilenburg, 1999: 197–8; McQuail, 1992: 143–4). However, diversity not only refers to media content but to media structure as well; media structure is assumed to influence the performance of media organizations 'in the sense of the type and amount of media content produced and offered to audiences' (McQuail, 2005: 277):

> *Policies designed to enhance source diversity . . . are not implemented purely for the sake of enhancing source diversity. The assumption that a greater diversity of sources leads to a greater diversity of content has been implicit in virtually all these source diversity policies. (Napoli, 1999: 14)*

Regulating media structure is an attempt to influence media content indirectly. A diversity of sources is thought to provide the conditions necessary for a diversity of ideas, issues and genres. Content diversity, however, does not necessarily generate exposure diversity or diversity of use (McQuail, 1992: 157; Napoli, 1999: 24–9; see the article by d'Haenens et al., this issue, pp. 53–4).

Two different regulatory approaches to media diversity can be distinguished: the competition or market approach, endorsing economic regulation to prevent market failure, and the interventionist or public regulation approach, involving an active media policy (Grisold, 1996: 505; Karppinen, 2006: 58). Thus, on the one hand, it is possible to equate diversity with freedom of choice and a so-called free marketplace of ideas (Karppinen, 2006: 57). From this perspective, diversity is best achieved when people can freely enter this marketplace without any governmental constraints – a concept based upon classical economic market theory (van Cuilenburg, 1999: 193). On the other hand, however, the interventionist approach relies on a different interpretation of diversity, highlighting the importance of various political views and cultural values (Karppinen, 2006: 57). In contrast to the competition approach the interventionist approach goes beyond the economic (see Table 1).

In line with the interventionist approach, in many countries public service broadcasters were institutionalized and the licensing of private broadcasting is often subject to certain conditions. Furthermore, possible regulatory measures include press subsidies, support programmes for the audiovisual industry and the funding of public service broadcasting. In addition to competition law, it is possible to specifically regulate media concentration and to restrict cross-ownership. The regulation of distribution not only allows for access requirements but also for must-carry obligations. Finally, regarding content, specific requirements might aim at enhancing diversity as well (e.g. quota regulations). In sum, the interventionist approach allows for a variety of regulatory measures aimed at protecting or promoting media diversity.

TABLE 1
Regulatory Measures Aimed at Enhancing and Promoting Diversity

Domains of media regulation	Competition approach	Interventionist approach
Organization	Licensing of private broadcasters	Institutionalization of public service broadcasting; conditions for private broadcasting
Funding	–	Press subsidies; support programme for audiovisual production; funding of public service
Ownership	Competition law	Media-specific regulation of concentration and ownership
Distribution	Access to network providers with significant market power	Must-carry obligations
Content	–	Content requirements

Source: Based on Puppis (2007: 292) and Puppis et al. (2007: 67–8).

Small States – Different Goals?

Considering the structural peculiarities of small states, and assuming that diversity is a regulatory goal at all, it is first suggested that *small states tend to the interventionist approach*. The competition approach with its free marketplace of ideas fails due to the economic realities in small media markets. Achieving diversity through competition between several domestic media organizations is not possible given the small audience and advertising markets. Thus, media regulation plays an important role: 'as the media in small countries face more difficulties in fulfilling their cultural and social obligations than the media in bigger countries, all kinds of political regulation and control concerning the media become crucial' (Siegert, 2006: 202).

While small market size forms an obstacle, small states with an exclusive language are less vulnerable and less exposed to competition from abroad. Thus, a protection against foreign influence through media regulation seems especially important for small states that are part of a bigger language market. Therefore, it is secondly suggested that small states with giant neighbours might even *develop a tendency to subordinate media diversity to pursue other goals*, in particular protectionism. A protectionist media regulation may just be better suited to preserve a national media culture and/or a strong and competitive media industry. As subsidies and support programmes demonstrate, protectionism does not have to be incompatible with media diversity. However, conflicting goal might emerge. To guarantee the existence of domestic media providing indigenous programmes and local news, small states may choose to preserve a public service monopoly resulting in a rather late introduction of private broadcasting. Or they may allow for cross-media ownership and do without regulation of media concentration in order to foster a

strong domestic media industry. Viewed in this light, the desire to have domestic and internationally competitive media might undermine the protection and promotion of diversity. Protecting local media culture against foreign media companies could become a more important policy goal than media diversity.

Conclusion

A small states perspective detached from corporatism remains important in the analysis of media systems across the globe. Widely used typologies disregard the significance of the structural peculiarities of small media systems. Keeping small production and sales markets, dependence and the high penetration of foreign media in mind helps us to understand how small states regulate the media and cope with globalization, commercialization and digitization.

The following articles, focusing on different Western and Eastern European small states, examine the ways in which small media systems are special. Specifically, the authors look at the connection between smallness and regulation, paying special attention to the propositions presented in this introduction regarding interventionism and protectionism.

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