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## Comparing media systems: The European Dimension

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**Summary:** Comparative media studies have become a central research area within academic media research. International comparison of media systems has undergone an impressive development in the last five decades. This article is about the classic contribution to the study of comparative media systems and what this means for Europe. The authors present short description of the major contributions and after that relate them to the European experience.

Starting point of comparative media analysis was the question "Why is the press as it is?" as Siebert, Peterson, and Schramm put it in 1956, when they published their famous comparative study which claimed, not only to explain what the press does and why, but, as the subtitle claimed, What the Press Should Be and Do.

Key words: media systems, globalization, internationalization

Media systems are embedded in their social environment which is both culturally and nationally shaped environment. Thus, they must be considered in the frame of their territorial borders as they are marked by the states. Media systems of different states differ. Why do they differ, in which aspects do they differ? What are the consequences of these differences? What is the dynamics which make media systems change and develop? These are the questions comparative media analyses deals with.

As a counter trend to the boasting comparative media research which is based on a national perspective we offer analysis of media developments which

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try to seize concepts as internationalization, and globalization. While the first still start from the assumption of national media systems and look for processes of transgressing borders, the latter claims that the national characteristics become less and less important. The vision of a globalized media system is at the end point of these arguments.

Comparative media studies are meanwhile a central research area within media academic research. International comparison of media systems has undergone an impressive development in the last 50 years. This contribution will try to draw a line from the fruits of 50 years of comparative media system analysis to the discussion of globalization of media systems. It will identify the analytical tools and theoretical concepts of international comparisons of media systems in order to find out the desiderata and perspectives.

Siebert, Peterson, and Schramm started efforts of media systems classification with their *Four theories of the press* (1956) which is of some influence still today, although it had been criticized for many reasons and overcome by much more refined models. Their central idea was "that the press always takes of the form and coloration of the social and political structures within which it operates" (1956: 1f.). They identified four types of media systems according to their historical appearance. The main categories they found to describe these types are the philosophical foundations, the sort of relationship between state and the individual, the aims media pursue in their performance, the forms of control they are subjected to, and forms of ownership.

Based on these categories they found first the authoritarian model, dating from the 16<sup>th</sup> and 17<sup>th</sup> century, which is mainly characterized by an understanding of media, i.e. at these times the press, which have to promote and support the politics of the authoritarian sovereign. The second model emerging in opposition to the previous one is based on the philosophy of enlightenment. It is the liberal one which mainly turns around the logic of control of its ancestor. Control over the media is now carried out by the market, and the media themselves have the task to control the government.

The concepts of the third and fourth model are strongly influenced by the political conflicts of the 1950's. Some years before, the Hutchins Commission on the Press in the USA had criticized the performance of mass media and claimed that the media need to show more responsibility. According to these ideas, Siebert, Peterson, and Schramm identified a social responsibility model of the press, with main characteristic being the accountability of the media to

the society and that the state entitled to interfere in case when the media do not fulfil this prerequisite. Interestingly enough, this model was never put into practice in the USA, but European academics claim that it had been implemented in Western Europe with the creation of public service broadcasting.

The peak of the cold war led to the identification of a fourth model, which is the communist model. It is marked by the media which are firmly in the grip of the state and controlled by it to serve the communist ideology.

Classification made so far had a strong normative approach. By looking at the rationales and theories behind the press and describing these normative rationales, the description of the models itself had a normative bias as it is founded on an ethnocentric grounded philosophy of freedom. It wanted to explain differences of media systems and press performance, and it ended up in measuring the performance of media system in other countries against the background of the western dominating philosophical mainstream of liberalism. The *Four theories of the press* thus compared ideas behind the press, not the empirical state of the press itself, and it confined itself to few countries, namely the USA, the UK and the Soviet Union.

A central reference to Europe in this approach is the first, authoritarian model as it describes the early media history of the continent. This makes sense, but has little relevance for the understanding of European situation today. The focus during the days when this classification was developed was on the Cold War and the confrontation between East and West. The East was clearly represented by the Communist model that has disappeared with the transformation processes in Eastern and Central Europe (it might have survived in North Korea). On the Western side, the libertarian and the public service models were located. During the 1950's the public service model was absolutely predominant in Europe in broadcasting (only in Britain the policy of ITV had started), whereas in the US the commercial model had virtually conquered the country (even the small public radio and TV sector of today did not exist). The Siebert et al. classification reflects the assessment of the time, that the "West" has more in common and differences are minimal. As such, the American authors did not really understand the specifics of Europe.

This schematic classification of media systems continued in the concept of Ronneberger (1978), who contrasted North/South and East/West systems. The Western model, located in Europe and North America, follows the liberal model of Siebert, Peterson, and Schramm as well as the Eastern followed the

communist model. He adds two models, located in the South, in the developing countries, stating that there is one version with political active media, which are endowed by the government with a guidance function, and a second version, where the media overtake a developing function out of their own will and autonomy, but still in accordance with the governmental support. Again in this concept the Western liberal model is the straightedge of classification and uses the binary code of free and un-free media (Massmann, 2003: 31). It is Ronneberger's credit that he added to the hitherto bipolar consideration the view on developing countries – modernizing theories are consequently in the background of this concept.

Few years later Martin and Chaudhary (1983) segmented the world into three ideological systems, the Western, the communist and the third world, and described important aspects of the media against this background: the nature and treatment of news, the role of mass media, their signification as vehicles of education, persuasion, opinion making and entertainment and looked at mass media economics and press freedom. Thus, the scope of elements was enlarged and a functionalist view came into consideration. But the approach was a top down one – given the ideological differences of these world systems the media existence was analysed in this frame.

Clearly the increased importance of the developing world is reflected in these approaches. It goes together with the fact that the so called Third World became an important independent actor on the global stage, especially in the negotiations of the UNESCO General Assembly that led to the confrontation between the Western position of "free flow of communication" against the "New World Information and Communication Order" with a more controlled and balanced flow, as it was supported by the Second (socialist) and the Third World. As the members states of UNESCO overwhelmingly voted for the NWICO, the United States and Great Britain left the world organization under protest. The continental Western European countries stayed and successfully changed the workings from within. Many years later the U.S and the UK returned; when a vote on the Convention for Cultural Diversity came up in 2000 the US were the sole dissenter (together with Israel). Concerning the role of the British media system, it was at times the entry point for American investment as well as American business models (commercial TV since), but gradually the media are no longer American and Britain is moving more in the European direction (Tunstall).

The contingency model of communication of Wiio (1983), ironically published in the very same volume, marked the effort to abandon this normatively grounded approach as it tried to find categories by which media systems could be described empirically. He differentiated between the openness or closed character of the receiver and the message system, between public and private ownership in combination with centralized and decentralized control of the media, and the right to receive and the right to send information which can be either with the individual or state. Thus he introduced more categories and tried to avoid the hitherto dichotomies of media classification. Although he ended up in identifying two types of communication models, the Marxist models, being sender centred, and the pluralist models, being receiver centred, his approach allowed to look especially at Western media systems not as a monolithic entity but as different types of media systems according to the categories in use. Under the roof of the two mentioned types he proposed twelve models, where Western states found themselves at different places: the controlled mass communication, open mass communication, private communication, directed mass communication, decentralized public model, centralized public model, decentralized private model, centralized private model, authoritarian model, communist model, libertarian model, social responsibility model. The four latter, known from Siebert, Peterson and Schramm are yet only identified with the category of the right to send and to receive; looking at media ownership brings up other models. Thus with Wiio's approach one can look at conditions, circumstances, and situations which are causative for different combinations of internal and external influences on media and their performance.

Instead of using the traditional dichotomies, mainly of free and un-free media, Wiio shows that assessments about media systems are dependent on the considered elements of the media systems and the chosen dimensions of classification but control is existent in all media system. Only the source and degree of control differs.

Convergent elements of different media systems show another approach which immediately followed the one of Wiio. Altschull (1984) looked at purposes of journalism, views on press freedom, articles of faith as they are described by the representatives of the different media systems themselves. Unlike Siebert, Peterson and Schramm, he does not measure the models he finds according to one overruling value system, but looks at the discrepancy of self description and practice in different countries. The common characteristic of

the market model, the Marxist model and the advancing model in his concept is that in all media systems "news media are agents of those who exercise political or economical power" and that for that reason "the content of the news media reflects the interest of those who finance the press" (Altschull, 1984: 298).

Thus, Altschull takes up the idea of Ronneberger to integrate developing countries with their special approach to the media, he considers the ideologies of media systems like Siebert, Peterson and Schramm and he includes, as well as Wiio, the empirical reality of the media.

His contribution to comparative media system analysis was the idea that classification of media systems in communication science has been hitherto reflecting the bloc ideology of the Cold War, that notions as objectivity, press freedom, presentation of truth and the assumption, media service to the right of information of the public are not sufficient for characterizing media systems (Massmann. 2003: 46).

These approaches reflect European perspectives of the 1970's and 1980's. On one side, there was an ongoing experience of the division of Europe, but the Continent was also seen as a common geographical space and increasingly the similarities of societies on both sides of the Iron Curtain were appearing. The theoretical school behind this view is the idea of convergence of industrial societies, no matter if capitalist or real socialist (Galbraith). One could describe Altschull's approach as a media version of the prominent convergence approach.

The binary differentiation of open and closed media systems is revived again nearly ten years later by Weischenberg (1992) shortly after the fall of the Berlin wall – here referring to the theory of social systems. The debate about the collapse of the world political system and the lack of empirical knowledge about the insides of the media systems of the socialist countries is still reflected in his approach, as the categories for describing the closed system of the media in the former socialist countries do not go far beyond the general description that the influence of other social subsystems on the media (except the state) was not existent in these countries. A coherent development of categories to find typologies of media systems, as it was developed by his predecessors, does not take place in this work, which is – admitting for the sake of fairness – presented in a student's textbook.

Again, short after the end of the socialist countries, Kleinsteuber (1994) describes three types of media systems: the Eastern real-socialist type, the West-

ern liberal one and the Third World type, underlining that these are only ideal types of media systems which do not exist with all the described characteristics in the given countries, but which are abstract models showing collective singularities of a greater amount of states. Although he takes the mixed system of public service broadcasting and commercial broadcasting as one important characteristic of the Western liberal type, he marks the commercialization of the media system as a central element of this type and thus introduces an element of dynamics in the static description of media systems He describes the Eastern real-socialist type as a historic type which tends to develop into the direction of the Western-liberal type, thus looking again at the dynamics of media systems.

An important step in comparison of media systems was the publication of Hallin and Mancini who took over the intriguing idea of Siebert, Peterson and Schramm. They use only a small number of discreet models, but claim to have developed better empirically grounded models. Indeed, they developed a very comprehensive scheme to describe the environment of politics and political culture which is shaping a media system. With this ideas they could built upon Blumler and Gurevitch (1995) who looked for criteria that connect the political and the media system. Hallin and Mancini's approach follows a most similar scheme, as they include in their analysis only the countries of the developed capitalist democracies, i.e. countries from Western Europe and North America.

They look for the character of political pluralism in these countries, the ways of parting political power, the role of interest groups, and the role of the state. Concerning the media, historical development of alphabetization and the role of the press, the parallelism of media and political parties, the degree of professionalization of journalists and the degree of state control over the media are the decisive dimensions.

In combination of different occurrences of these dimensions their analysis results in three models:

- the liberal model, being found in Britain, Ireland and North America, characterized "by a relative dominance of market mechanisms and of commercial media";
- the democratic corporatist model, prevailing across northern continental Europe, characterized "by historical coexistence of commercial media and media tied to organized social and political groups"; and

• the polarized pluralist model, prevailing in the Mediterranean countries of southern Europe, being characterized by "integration of the media into party politics, weaker historical development of commercial media, and a strong role of the state" (Hallin and Mancini, 2004: 11).

Thus, Hallin and Mancini fulfilled what many scholars before them were seeking: that comparative media system analysis has to start from empirically grounded categories and not from ideologies and must then develop comprehensive differentiated types. The weak point of this approach becomes evident and is not denied by the two authors: It is an enormous problem of research cost to gather all the required data from different countries in order to draw a precise picture for the models. This is also the reason why they developed a typology fitting only for a restricted political system and a part of the globe, and not being able to describe the media systems in Eastern Europe, Arab countries, Asia or Africa.

Hallin and Mancini seemingly reflect the transatlantic perspective of the early theories of Siebert et al. (to which they also refer), but in fact they moved away from it. Different from the earlier, highly normative approaches, they base their analysis on a careful study of all available material and strictly base their description on empirical data. In the meantime methods of comparative research had been developed and led to a much more downsized typology. This does not mean that the new inventory of models is without problems. The placing of the US with a nearly purely commercial system with Britain and its dual media structure in one cluster is problematic. Also the Northern European model with media systems like Iceland and Germany, Switzerland and the Netherlands is also disputable.

The surprising finding of their analysis is that territorial entities generated similar media systems. World regions have common features in their mediascape. This idea is at the bottom of the concept of Blum (2005), who wants to complete the Hallin/Mancini models. He takes the similarities of mentalities and cultures in a given world region as an explanation for similar media systems of such a region. Therefore he introduces further categories into the analysis in order to be able to describe not only the political system but also cultural features as explanatory variables for different types of media systems. He looked at dimensions like media freedom, media ownership, media funding, media culture and orientation, and combined these dimensions with some of Hallin and Mancini's elements into a synthesis. Thus, he integrated media centred

and policy centred elements into his model. Each of the dimensions can follow either a liberal line, or a regulated line or a line in between.

	A: liberal	B: middle	C: regulated	
1. Government system	democratic	authoritarian	totalitarian	
2. Political Culture	polarized	ambivalent	concurring	
3. Media freedom	no censorship	cases of censorship	permanent censorship	
4 .Media ownership	private	private and public	public	
5. Funding of media	market	market and state	state	
6. Parallelism of media and political parties	low	moderate	high	
7. State control of media	low	moderate	high	
8. Media culture	investigative	ambivalent	concurring	
9. Media orientation	commercial	divergent	public service	

Table 1. Categories for media systems (Blum, 2005)

In the combination of these dimensions and their occurrences he identifies six types of media systems which can be described as follows:

- The Atlantic-Pacific liberal model with A variables in every dimension –
  has a media system which is orientated to commerce and autonomy and
  which is investigative. Typical examples are the USA, Australia and New
  Zealand.
- The southern European clientelistic model with a domination of B variables, which is typical for ambivalence has a commercial-populist orientation of TV and an elitist public-service orientated print sector. Blum finds it in Portugal, Spain, Greece, Malta and Cyprus and might be in Eastern Europe.
- The northern European public service model with a strong mixture of A and B variables has a public service orientation in broadcasting and the print sector. It includes Germany, Scandinavia, the Benelux states and France, as well as, modernized eastern European countries, such as Estonia.
- The eastern European shock model with dominating B variable including a strong state control of the media within a formal democratic frame represents a media system where the government often interferes

and breaches media freedom, as it is the case in Russia, Ukraine, Belarus, Iran or Turkey.

- The Arab-Asian patriot model located between B and C variables postulates that the media are bound for supporting development aims and underlies censorship. Blum names Egypt as typical for that model, and lists also Syria, Tunisia or Morocco and Asian countries like Indonesia.
- The Asian-Caribbean command model with a majority of C indicators

   represents countries in which the government has an absolute control
   over the media except that the market is used for funding them. China
   is representative for that model, which fits as well for North Korea, Viet nam, Burma or Cuba.

Models  Dimensions	<b>Liberalism</b> Atlantic- Pacific	Clientelism Southern Europe	Public Service Northern Europe	Shock Eastern Europe	Patriotism Arabian- Asian	Command Asian- Caribique
1. Government system	A	A	A	A	В	С
2. Political Culture	A	В	В	В	С	С
3. Media freedom	A	A	A	В	В	С
4. Media ownership	A	В	В	В	В	С
5. Funding of media	A	В	В	В	В	В
6. Parallelism of media and political parties	A	В	A	В	С	С
7. State control of media	A	В	A	С	С	С
8. Media culture	A	В	В	В	С	С
9. Media orientation	A	В	С	В	С	С

Table 2. Models of media systems (Blum, 2005)

With these dimensions and the offered typology Blum created a classification for media systems which permits the integration of the majority of countries on the earth. The main problem is if the affiliation of many countries to the typology is adequate. The judging on the specifications is not explained in the model, and it gives the impression of being rather tentative. Further more it is questionable, if not another combination of specification of the dimensions

might create further types. Blum did not explain how he created the models, why no other combination of specification is necessary. This leads back to the problem, which was already discussed with the model of Hallin and Mancini: Comparing the media systems of the world and explaining their differences out of the underlying political culture needs an intimate knowledge of many details of the analysed countries. They will never be concentrated with a single scholar or research group but will necessitate international joint efforts to apply an agreed set of dimensions and operationalization of their specifications to the analysed countries<sup>3</sup>.

Based on the unique experience of Europe and its mixture of many states, big and small (Germany v. Monte Carlo), nation states and those of multinational populations (Denmark v. Switzerland), cultures well protected by a unique language (Finland, Hungary) or part of a much larger language space that means domination by the outside (Austria *vis a vis* Germany) – typologies that look for a geographical section inside the continent (like with Hallin and Mancini) cannot describe the variety. Another approach might look at the size of states: Small countries like Ireland or Austria tend to keep their public service broadcasters strong, as they are concerned about foreign influences. Also they are less attractive for commercial actors that include them in their programmes that cater to a larger language space (the German language space in Switzerland or Austria, the French in Belgium and Switzerland). Other smaller countries gave up and tolerate a much more commercialized and internationalized system (like in Greece).

While most of the authors of the presented classification of media systems tended to reduce their typology to few models, others argue that the diversity of media systems in the world and their development makes it necessary to find more flexible modes of description. It is the question of all model buildings that they have to keep the balance between a degree of abstraction which legitimates the model and a degree of refinement which is adequate for the variety of cases. A lot of further empirical data gathering and modelling will be necessary in this perspective.

One reason for the problem of finding adequate affiliation of the existing countries to the models is that media systems are subject to a strong dynamics and that they influence each other a lot. The transformation of the media systems in Eastern Europe is a blatant example for this dynamic. Although – according to the hitherto existing models – until the collapse of the socialist

<sup>&</sup>lt;sup>3</sup> The first experiment of the author with this model, which she presented to scholars from Southern Asia, proved that many of them did not agree to the affiliation of their countries as Blum put it. A further discussion resulted in a disagreement on the specifications of the dimensions.

political system they belonged to the same types, they adopted very different paths. The transformation of media systems had been clarified in different studies (see Thomass and Tzankoff, 2001), but the reason for changes of media systems had not been modelled theoretically until now.

The situation turned out to be quite different during the breakdown of the Communist regimes in Central and Eastern Europe. The state controlled media had no chance for survival and were either sold to investors (often foreign), re-established as public broadcasters or simply disappeared. Therefore the post-communist democracies passed a much more thorough process of transformation with change in ownership and often foreign investors moving in. Following a long tradition some of the public service broadcasters are still suffering heavy pressure of the political majority (Poland) others enjoy more autonomy (Czech Republic). Also the journalists are an interesting research object. Sometimes they were among the avant-garde of political liberalization (as in Poland) or lagged behind (as in Romania). The transformation process also showed an interesting aspect of gendering, several of the countries showed a tremendous influx of women in the journalistic profession, most eminent in Bulgaria. In all transformation countries Western European media companies have bought up or newly established newspapers and magazines, often clones of what they have successfully done in Western Europe: The Springer Company, the largest in Europe, that produces the best selling tabloid paper of Germany Bild, transferred the concept to Poland, where Fact is now the best selling paper.

Kleinsteuber presented an approach which seizes some central causes of dynamics – those which derive from influences of one media system on another. While comparison of media systems mostly follow a most similar or most different system design, which is marked by the two comparative methods of concordance or difference he proposes four more dimensions to describe results of comparisons (Kleinsteuber, 2003: 86):

- *Diffusion* describes the voluntary transfer of models or ideas which have proved to be successful, e.g. the model of public service broadcasting which was developed in Great Britain and taken over by many countries in Europe and the Commonwealth.
- *Dependence* as given, if a model emerged in dependence on another state, as it had been the case with the media systems in former socialist countries.
- *Temporance* is a notion Kleinsteuber creates for the phenomenon, that a development occurs similar, but with a time lag. Thus, the future of multichannel TV in Europe could be studied in the USA.

• *Performance* describes the phenomenon that similar systems take over positive elements from each other after having evaluated them thoroughly: Within the EU anti concentration regulation is analysed in order to come to a harmonization of the respective laws within the membership.

Again, the transformation of media systems in Eastern Europe could be explained to a deeper comprehension by these types of dynamics. Some countries followed a performance path looking at the media laws of western European countries. Other showed temperance in the sense that they had a boosting media (mostly print) market, which was earlier or later confined by media concentration processes. Dependence might still be given e.g. in the relation of Russia and Belarus.

Changes characterized by a dissolution of borders regarding the national framing of communication media are obvious and numerous. The global significance of the Internet and the impossibility to regulate it – from a national perspective – are the most apparent signs for this development. This dissolution of borders can be considered with regard to economic, legal, political, technical and cultural aspects. Economically speaking, global operating media conglomerates have long a powerful influence on national media markets. This is true for the US-American entertainment majors (Compaine and Gomery, 2000) and as well for global news agencies (Wilke, 1997). Media concentration is crossing national boundaries and it has gained a high degree (Kleinsteuber and Thomaß, 2004). Entertainment formats are sold worldwide on the global TV markets and advertising for branded products experiences a tendency to standardization in an international scope (Dmoch, 1996).

In Europe at least media law has been passed over to a supranational organisation. The EU has obtained a power for legislation which stands above the possibilities for formation of the national state. And communication politics – even if it does not dispose of institutions which have powers to enforce anything on a supranational level beyond the EU – has gained within the UN-ESCO international dimensions (Offenhäußer, 1999).

Regarding media technology worldwide communication streams had been generated already with satellites which eroded cultural self-determination of national states. Above all it is the internet which globalizes communication. Digital information overruns any national border; distances are irrelevant for the perception of world affairs. It seems as if geographic borders and barriers are more and more shrinking because of the media and that the world is becoming a global village with a unitary arena. With regard to the Internet national claims are no longer to be upheld. In fact, international networks try to decide

on standards and to implement them, which sometimes are labelled as a world government (Kleinwächter, 2005).

The rapid diffusion of communication technologies raises fears, that a commercially motivated cultural unification of the world takes place; that consumers' ideas, audiences' preferences and images of the world come close to a "McDonaldization". Even if processes of globalization are again and again thwarted by attempts of regionalization, this trend is highly visible (Kleinsteuber and Thomaß, 2002: 189). Further more, journalistic cultures are approaching to a degree – at least in the western and industrialized world – that national specifics seem to disappear beyond this trend (Weaver et al., 2006).

In the light of these developments, does it make sense to identify national media systems, analyze and compare them and work on their classification?

Media system classification, as it was presented in the tradition of communication scholars until now, starts from the idea, that law, geography, linguistic cultures, the political system, the economic constitution and a given state of media technology and its diffusion are formative factors for the media system, which on their side developed historically within a national frame. This legitimates the analysis of media systems as national ones. Media are embedded within cultural context, which have national as well as international dimensions, and only beginnings of global ones. In fact, media law and media politics, even if their reach is reduced because of globalization, make it possible to identify national media systems. Language and cultural spaces as well — not that clearly as media law and politics — are dominantly bound to national borders. Nevertheless these statements must not obstruct the view that dissolution of borders of the media systems in a global perspective is at full swing.

It is the comparison of specific phenomena in a given media systems which makes it possible to get insight into general tendencies which come into sight crossing borders. National media systems are a clear cut object of analysis which is subject to long term changes caused by globalization. This can be made perceptible by the aid of comparison of media systems. To the degree that processes of globalization influence the national media systems, the above mentioned dimensions of diffusion, dependence, temporance and performance gain importance as categories of comparative analysis. The integration of dynamics into the criteria of analyzing media systems will be able to explain globalization of media in a systematic way. This is the frame comparative media analysis has to develop next.

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