UvA-DARE (Digital Academic Repository)

Introduction

McGonagle, T.; van Eijk, N.

Publication date
2016

Document Version
Final published version

Published in
Regional and local broadcasting in Europe

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1. Introduction[1]

Tarlach McGonagle and Nico van Eijk, IViR

1.1. The importance of regional audiovisual media[2]

The media play a number of crucial roles in democratic society, most notably the role of public watchdog; the role of creating channels for the circulation of information and ideas; and the role of providing forums for public debate. The media's forum-providing role is particularly important for fostering participatory democracy because the media can open up shared spaces for discussion and debate on matters of public interest. Such discursive spaces can be created at different geographical levels, which exhibit different features.

Media operating at the regional level have special democratic significance as the relationship between regional media and persons from the areas and communities they serve tends to be closer than equivalent relationships at, for e.g., the national or international levels. That proximity is often evident in audience/readership/user statistics and in levels of participation in the media.

The special democratic significance of regional media can also be gauged by the nature and focus of regional journalism. This is due, firstly, to regional journalism's coverage of regional politics and issues that are either underrepresented in, or absent from, national journalism. It is also useful to point out that while regional media are the primary outlet for regional journalism, regional media are not necessarily or exclusively concerned with journalistic activities. It should also be recognised that emergent trends of collaborative or so-called citizen journalism show significant similarities with news-related community media activities.

Secondly, regional journalism also fosters public discussion of, and engagement with, regional politics and issues. The proximity of regional media to their target communities is therefore also political in character. This extends to social media (e.g. Facebook and Twitter) because they are an increasingly important source of information and tool for engagement when it comes to regional politics and issues, particularly during the run-up to regional elections or referenda.

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[1] This text is an abridged and reworked version of a 2014 study by the same authors which was used for the Council of Europe's Congress of Local and Regional Authorities as the Explanatory Memorandum to its Resolution 374 (2014) of 15 October 2014 on the role of regional media as a tool for building participatory democracy, and to its Recommendation 364 (2014) of 15 October 2014 on the role of regional media as a tool for building participatory democracy.

[2] For a more extensive exploration of the theoretical and conceptual framework governing regional media, see *ibid*.

The communicative space created by regional media allows regional identities (including cultural, linguistic and religious identities) to be explored, developed, sustained and promoted to a greater extent than is usually possible at the national level. Regional identities and languages are sometimes marginalised by dominant/mainstream national media, which underscores the importance of regional media as alternative discursive forums. Regional languages are a case in point: their vibrancy in society is often dependent on the availability and accessibility of regional media operating in those languages.

The shared nature of the communicative space created by regional media also facilitates inter-cultural dialogue, understanding and tolerance and thus contributes to the pre-emption and countering of hate speech.

Well-designed regulation and policy – at the European and national levels - can create an enabling environment for regional media. Various bodies of the Council of Europe have adopted standards, some legally-binding, some politically influential, that seek to create such an enabling environment. However, the overall body of relevant standards is not coherent and their value and impact are, to a large extent, contingent on the adequacy of corresponding or complementary standards at the national level. Part I of this publication provides an overview of relevant standards and markets at the European level, while Part II explores in detail the standards and market situations at the national level.

1.1.1. Terminology

The term "regional media" is open to multiple interpretations or definitions and in principle covers print, broadcast and digital media. For the purposes of this publication, though, the focus is on regional audiovisual media. This term is understood and used broadly as comprising a range of different types of audiovisual media operating at different sub-national levels. It includes public service, community, commercial, local and even, in certain circumstances, transfrontier audiovisual media. In practice, it can be difficult to distinguish between regional and local media, particularly in comparative or cross-country analyses. Sub-national media are subject to different regulatory frameworks and are characterised by different organisational structures. In the absence of clear consensus about the demarcation of regional and local media this publication has opted for a pragmatic approach. It therefore avoids trying to pin down "regional audiovisual media" in a hard definition and instead emphasises commonalities and differences between regional and local audiovisual media as appropriate and as required by differences of terminology in different countries.

1.2. Council of Europe framework

This section examines how the theories, concepts and definitions discussed in the previous section are articulated in relevant European standards. It provides an overview and analysis of a selection of relevant Council of Europe standards. The Council of Europe has developed an elaborate system of standards and mechanisms that seek to create an enabling environment for freedom of expression and media freedom.

1.2.1. European Convention on Human Rights

Article 10 of the European Convention on Human Rights, which guarantees everyone the right to freedom of expression, is at the heart of the Council of Europe's system. In its interpretation of Article 10, the European Court of Human Rights has repeatedly stressed the instrumental importance of journalists and the media for enhancing public debate in democratic society. The media can make important contributions to public debate by (widely) disseminating information and ideas and thereby contributing to opinion-forming processes within society. As the Court consistently acknowledges, this is particularly true of the audiovisual media because of their reach and impact. The Court has traditionally regarded the audiovisual media as more pervasive than the print media and now considers the Internet to be a medium with "no less powerful an effect than the print media".[3] The media can also make important contributions to public debate by serving as forums for discussion and debate.[4] This is especially true of regional media, by virtue of their close physical proximity to their audiences. It is also especially true of new media technologies which hold considerable potential for high levels of individual and group participation in society.[5] The Court recently strengthened its traditional support for individual participation in public debate[6] by expressly referring to the notion of "citizen journalism".[7]

Although the Court only has limited case-law dealing specifically with regional media, many of its more general principles concerning pluralism, participation, the media and democracy are also relevant for regional audiovisual media.[8]

1.2.2. Framework Convention for the Protection of National Minorities (FCNM)

The FCNM sets out a range of rights to be enjoyed by persons belonging to national minorities. Article 9 concerns the right to freedom of expression and access to the media and Article 6 concerns, inter alia, tolerance and intercultural dialogue. The Advisory Committee (AC) that monitors the FCNM frequently focuses on the impact of geographical, technological and market-related factors on the effectiveness of national minorities' access to the media. Such focuses imply consideration of whether the geographical reach of particular media targeting a particular minority group matches the actual demographic concentration of that minority. Useful distinctions in this regard include: sub-national (i.e. local and regional), national and transfrontier reach. Another consideration is the suitability of the means of distribution for media content. In other words, is the distribution platform in question accessible to, and widely used by, members of the target minority group? Finally, as regards market-related factors: media output catering for the interests of national minorities and/or in their languages is often less lucrative than mainstream equivalents. This can make it difficult for media to secure investment capital and advertising, which in turn makes it difficult for them to

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[3] *Fatullayev v. Azerbaijan*, no. 40984/07, § 95, 22 April 2010.

[4] *Társaság a Szabadságjogokért v. Hungary*, no. 37374/05, § 27, 14 April 2009.

[5] *Ahmet Yıldırım v. Turkey*, no. 3111/10, § 49, ECHR 2012.

[6] *Steel and Morris v. the United Kingdom*, no. 68416/01, ECHR 2005-II.

[7] *Cengiz and Others v. Turkey*, nos. 48226/10 and 14027/11, § 52, ECHR 2015.

[8] See, for example, *Gorzelik and Others v. Poland* [GC], no. 44158/98, § 92, ECHR 2004-I.

operate independently and efficiently. Such difficulties militate against the growth of minority (language) media, thereby maintaining access opportunities at a low level.[9]

The AC also tends to distinguish between access to different types of media, e.g. public-service, community and commercial, each of which can serve the expressive and informational needs and interests of persons belonging to national minorities in different ways. Given that the media comprise content, structures and processes, regulation tends to be both behavioural and structural. The AC therefore monitors prescriptions of particular types of content (e.g. broadcasting quota and percentages of programming budgets), such as that produced by or for minorities, including in their own languages. It also monitors the allocation of time-slots for minority programming with a view to determining whether they are long enough, frequent enough and scheduled at appropriate times. Subtitling and dubbing practices are also routinely monitored on account of their potential for making content accessible to a wider audience comprising varied linguistic backgrounds. The need for broadcast licensing processes to recognise and accommodate the needs, interests and situational specificities of national minorities is another recurrent priority theme. The general question of the official recognition of national minorities and their languages (to the extent that the applicability of media laws and policies is conditional on the enjoyment of official status) is often addressed as well.

1.2.3. The European Charter on Regional or Minority Languages (ECRML)

The central purpose of the ECRML is to protect and promote regional or minority languages in Europe. It recognises that regional or minority languages are a "threatened aspect of Europe's cultural heritage" and therefore merit protection and promotion.[10] The Charter's dual strategy is to focus on (i) non-discrimination as regards the use of regional or minority languages, and (ii) measures offering active support for such languages.[11] The promotional measures set out in the Charter concentrate on the use of regional or minority languages in specific spheres of public life. The contemplated promotional measures – in a range of pertinent contexts – are seen as a means through which regional or minority languages may be "compensated, where necessary, for unfavourable conditions in the past and preserved and developed as a living facet of Europe's cultural identity".[12] As such, the objective of cultural and linguistic diversity also informs the Charter's approach.[13]

In terms of scope, the Charter covers "regional or minority languages", which are defined as languages: "(i) traditionally used within a given territory of a State by nationals of that State who form a group numerically smaller than the rest of the State's population; and (ii) different from the official language(s) of that State".[14] Furthermore, "dialects of the official language(s) of the State or the languages of migrants" are not included in the definition of regional or minority languages.[15]

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[9] See generally: Mike Cormack & Niamh Hourigan, Eds., *Minority Language Media: Concepts, Critiques and Case Studies* (Clevedon, Multilingual Matters Ltd., 2007).

[10] Explanatory Report to the European Charter for Regional or Minority Languages, para. 10.

[11] *Ibid*.

[12] *Ibid*.

[13] *Ibid*., para. 11.

[14] Article 1(a), ECRML.

[15] *Ibid*. For further explanation, see the Explanatory Report to the Charter, *op, cit*., paras. 30-33.

Article 11 is the Charter's principal article concerning the right to freedom of expression and the media.[16] It opens with an acknowledgement that national public authorities have varying levels of competence in respect of media regulation and oversight, and a call for the principle of "the independence and autonomy of the media" to be respected (Article 11(1)). The main substantive focuses of the Article are:

- public service radio and television (Article 11(1)(a));

- radio and television generally (Article 11(1)(b) and (c), respectively);

- production and distribution of audio and audiovisual works (Article 11(1)(d));

- newspapers (Article 11(1)(e));

- funding for media/audiovisual production (Article 11(1)(f));

- support for the training of journalists and media professionals (Article 11(1)(g));

- freedom of direct reception and non-opposition of retransmission of radio and television broadcasts from neighbouring countries (Article 11(2));

- non-restriction of free circulation of information in the written press (Article 11(2)), and

- representation/taking into account of interests of regional or minority language speakers within bodies with "responsibility for guaranteeing the freedom and pluralism of the media" (Article 11(3)).[17]

States Parties are required to choose and apply at least one paragraph or sub-paragraph from Article 11. Most of the paragraphs and sub-paragraphs contain internal choices between commitments of varying degrees of onerousness. The extent of the available choice is widened further by recurrent reliance on the formula "to encourage and/or facilitate" [particular measures]. For instance, Article 11(1)(a) offers States a choice between the following options in respect of their public service broadcasting systems:

1) to ensure the creation of at least one radio station and one television channel in the regional or minority languages; or

2) to encourage and/or facilitate the creation of at least one radio station and one television channel in the regional or minority languages; or

3) to make adequate provision so that broadcasters offer programmes in the regional or minority languages.

The ability to make internal choices within paragraphs therefore clearly offers States a high degree of flexibility in determining the precise focus and extent of their commitments in respect of the media.

Many of the key issues identified by the Advisory Committee on the FCNM are also regularly flagged by the Charter's Committee of Experts. Engagement with these issues is similar to the

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[16] See further, Jean-Marie Woehrling, *The European Charter for Regional or Minority Languages: A critical commentary* (Strasbourg, Council of Europe Publishing, 2005), pp. 200-214, and very comprehensively, Tom Moring & Robert Dunbar, *The European Charter for Regional or Minority Languages and the Media* (Strasbourg, Council of Europe Publishing, 2008).

[17] It should be noted that each of these focuses pertains specifically to regional or minority languages.

engagement under the FCNM, but predictably with extra scrutiny of their linguistic dimension.[18] Also, as one would expect, there is systematic attention paid to the impact of general language policy on media activities in regional or minority languages. The impact of the media on the public profile, prominence and prestige enjoyed by regional or minority languages is also a recurrent issue. Arising from Article 11(3) of the ECRML, the representation of interests of speakers of regional or minority languages in media regulatory/monitoring authorities is frequently addressed. Article 11(3) addresses an additional dimension to the questions of representation and participation in the media discussed at the beginning of this chapter. Ensuring that the interests of the users of regional or minority languages are taken into account in bodies charged with guaranteeing freedom and pluralism of the media is a very important and potentially far-reaching policy goal. It strives for the institutional incorporation of minority interests in bodies which often have considerable influence on law and policy-making. Such policies can be regarded as outgrowths of more general democratic principles and they greatly enhance the likelihood that future regulation and policy will reflect and cater for the needs and interests of linguistic minorities.[19]

1.2.4. Non-treaty-based standard-setting

As mentioned above, the case-law of the European Court of Human Rights dealing specifically with distinctive features of regional media is limited. In practice, the FCNM and ECRML compensate for that – to an extent – by focusing on minority-specific and linguistic issues that are relevant for (some) regional media. Other standard-setting work, for instance by the Committee of Ministers, the Parliamentary Assembly and the Congress of Local and Regional Authorities, complements the treaty-based approaches by spelling out the relevance of the Court's general principles for regional media.

1.2.4.1. Committee of Ministers

Several texts adopted by the Committee of Ministers merit special mention in this connection. The first focuses on the role of community media in promoting social cohesion and intercultural dialogue and two others focus on different – but related – aspects of media pluralism and diversity of content and concentration of ownership.

The Committee of Ministers' 2009 Declaration on the role of community media in promoting social cohesion and intercultural dialogue[20] explains in detail the distinctive characteristics of community media and their functional importance to society. It recognises "community media as a distinct media sector, alongside public service and private commercial media" and stresses the need to examine ways in which legal frameworks could be adapted in order to facilitate the development and optimal functioning of community media. It favours allocating a sufficient number of (analogue

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[18] See further: Tom Moring & Robert Dunbar, *The European Charter for Regional or Minority Languages and the Media*, op. cit.

[19] See further, Tarlach McGonagle, "Introduction to and Summary of the Survey of State Practice: 'Minority-Language Related Broadcasting and Legislation in the OSCE'", in George Jones, Sally Holt & John Packer, Eds., 8 *Mercator Media Forum* (2005), pp. 84-99, at p. 95. For an analysis of the practical shortcomings of Article 11(3), ECRML, see: Robert Dunbar, "Definitively interpreting the European Charter for Regional or Minority Languages: the legal challenges", in Robert Dunbar, Gwynedd Parry & Simone Klinge, Eds., *The European Charter for Regional or Minority Languages: Legal Challenges and Opportunities* (Regional or Minority Languages, No. 5) (Strasbourg, Council of Europe Publishing, 2008), pp. 37-61, at pp. 50-51.

[20] Declaration on the role of community media in promoting social cohesion and intercultural dialogue, 11 February 2009, https://search.coe.int/cm/Pages/result_details.aspx?ObjectID=09000016805d1bd1.

and digital) frequencies to community media and ensuring that community media are not disadvantaged by the digital switch-over. It advocates educational and vocational measures geared towards maximising all communities' use of available technological platforms.

The Declaration also "[S]tresses the desirability of":

■ exploring various funding possibilities for the community media sector;

■ promoting good practice in community media, *inter alia*, through conducting studies, exchanging information and programmes and other collaborative projects;

■ facilitating appropriate capacity-building and training of community media workers;

■ "encouraging the media's contribution to intercultural dialogue", *e.g.* by establishing networks on which to exchange information.

As such, this Declaration is very much in the tradition of earlier standard-setting work by the Committee of Ministers that emphasises the important social and democratic contributions that can be made by the media, especially as regards the promotion of societal tolerance.[21] The particular role of community media in fostering societal cohesion and intercultural exchanges and understanding at the regional and local levels is largely explained by their participatory objectives and accessibility to the communities they serve.

For its part, the Committee of Ministers' 2007 Declaration on protecting the role of the media in democracy in the context of media concentration[22] is very forthright in its recognition of the symbiotic relationship between media freedom, pluralism and democracy. It underscores the importance of the media in facilitating effective participation in democratic processes and the development of a "democratic and participatory public sphere". The Declaration acknowledges "the opportunities offered by the development of new communication services and of phenomena such as multimedia, alternative media, community media and consumer-generated content on the Internet, but aware also that their opinion-shaping impact is often dependent upon their content being carried in or reported by mainstream media". Based on that insight, it stresses that "policies designed to encourage the development of not-for-profit media can be another way to promote a diversity of autonomous channels for the dissemination of information and expression of opinion, especially for and by social groups on which mainstream media rarely concentrate".

The Committee of Ministers' 2007 Recommendation on media pluralism and diversity of media content[23] is also cognisant of "the crucial contribution of the media in fostering public debate, political pluralism and awareness of diverse opinions, notably by providing different groups in society – including cultural, linguistic, ethnic, religious or other minorities – with an opportunity to receive and impart information, to express themselves and to exchange ideas". It recommends that media ownership rules "should be adapted to the size and the specific characteristics of the national, regional or local audiovisual media and/or text-based media market to which they would be applicable" (para. 2.2). It also calls on Council of Europe member states to "take any financial and regulatory measures necessary to protect and promote structural pluralism of audiovisual and print

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[21] See, for example, Committee of Ministers' Recommendation Rec (2003) 9 on measures to promote the democratic and social contribution of digital broadcasting, 28 May 2003 and Recommendation No. R (97) 21 on the media and the promotion of a culture of tolerance, 30 October 1997.

[22] Declaration on protecting the role of the media in democracy in the context of media concentration, 31 January 2007.

[23] Recommendation CM/Rec(2007)2 on media pluralism and diversity of media content, 31 January 2007.

media" (para. 6.1). In the general spirit of the Recommendation, this would have particular consequences for regional media.

1.2.4.2. Parliamentary Assembly

The Parliamentary Assembly has traditionally been a strong supporter of regional and local newspapers and radio. More recently, it has drawn attention to the regional dimension of public service broadcasting and in particular the need to support it with adequate funding.[24] Another more recent focus has been the need to promote the use of minority (and/or regional) languages via the media.[25]

1.2.4.3. Congress of Local and Regional Authorities

The Congress of Local and Regional Authorities' approach to regional media was for some time set out primarily in its Recommendations and Resolutions on the state of regional print media in Europe – Pluralism, independence and freedom in regional press (2002) and on regional media and transfrontier co-operation (2005).[26] These texts are less widely known than Committee of Ministers' texts, but their sharp focus on regional media, coupled with the detailed, tailored nature of the measures they propose to different stake-holders, means that they can play an important role in bridging more general Council of Europe standards and policy and practice in Council of Europe Member States.

As their title suggests, the Recommendation and the Resolutions on the state of regional print media in Europe – Pluralism, independence and freedom in regional press, examine the economic situation of the regional press and the implications of financial precariousness and concentrations of ownership for pluralistic democratic society. Both the Recommendation and the Resolutions put forward a range of measures that could usefully be pursued by a variety of stake-holders in order to ameliorate pluralism among regional media.

In 2014, the Congress re-invigorated its approach to regional media in its Recommendation and Resolution on the role of regional media as a tool for building participatory democracy.[27] In its Resolution 374 (2014), the Congress invites regional authorities of Council of Europe Member States to, *inter alia*:

a. *recognise the role of regional media in promoting participatory democracy, and revise the existing regional regulatory frameworks to adapt them to the new media environment […];*

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[24] The Funding of Public Service Broadcasting, Recommendation 1878 (2009), Parliamentary Assembly of the Council of Europe, 25 June 2009.

[25] The 2003 guidelines on the use of minority languages in the broadcast media and the Council of Europe standards: need to enhance cooperation and synergy with the OSCE, Recommendation 1773 (2006), Parliamentary Assembly of the Council of Europe, 17 November 2006.

[26] Resolution 145 (2002) on the state of regional print media in Europe – Pluralism, independence and freedom in regional press, 6 June 2002; Recommendation 119 (2002) on the state of regional print media in Europe – Pluralism, independence and freedom in regional press, 6 June 2002; Resolution 203 (2005) on regional media and transfrontier co-operation, 2 June 2005; Recommendation 173 (2005) on regional media and transfrontier co-operation, 2 June 2005.

[27] Resolution 374 (2014) on the role of regional media as a tool for building participatory democracy, 15 October 2014; Recommendation 364 (2014) on the role of regional media as a tool for building participatory democracy, 15 October 2014.

b. *ensure continued support for regional public service media, enjoying independent editorial control and organisational autonomy and providing distinctive content on all services and platforms;*

c. *support and facilitate the development of non-profit media, especially community media, in particular by avoiding licensing regimes for new media, ensuring sufficient frequency allocation and exploring various funding possibilities […];*

These priorities stress the need for regulation to facilitate the operation of regional media – especially public service media and community media - in a changing media environment.

In Recommendation 364 (2014), the Congress asks the Committee of Ministers to invite Member States of the Council of Europe to, *inter alia*:

c. include regional media within the existing media subsidies and use specific subsidy schemes for the promotion of regional journalism;

d. support regional efforts to maintain regional public service media, and to develop non-profit media, in particular community media;

e. take financial and regulatory measures necessary to protect and promote structural pluralism of audiovisual and print media, seeking greater transparency in media ownership rules;

f. support measures to bridge the 'digital divide' and promote media literacy at the regional level […].

These priorities acknowledge that besides suitable regulation, financial support is also crucial for the continued viability of regional media, especially public service media and community media.

1.3. Structure of publication

The principal goal of this publication is to collect the often disparate information concerning regional audiovisual media in Europe and present and analyse it in a comprehensive and coherent manner. It aims to serve as a first reference point or port-of-call for those interested in exploring the legal and operational dynamics of regional audiovisual media in detailed fashion.

Part I opens with an overview and analysis of the main features of regional media; their societal importance; the European-level law and policy frameworks governing them; and the markets in which they operate. Particular attention is paid to the importance of regional audiovisual media for democracy, pluralism and cultural life. This section includes an overview of recent and ongoing law and policy developments concerning the regional audiovisual media throughout Europe.

Part II examines similar themes and angles across a selection of national perspectives. Building on a wider geographical canvas provided by Chapter 2, this section presents more in-depth studies of a number of country situations: Germany, France, Italy, the Netherlands, Spain, Switzerland and the United Kingdom. Each of the case studies reveals particular features concerning how regional media are regulated and how they operate.

These countries have been chosen largely because of the distinctive or interesting features that their (regulatory) approaches to regional (and local) audiovisual media exhibit.[28] In most cases, the influence of the administrative organisation of the State in shaping the landscape for regional audiovisual media is evident.

In the German system, the ARD, as an association of nine independent public service broadcasters, provides a nationwide programme. In addition, each *Land* broadcaster has its own regional programming. As described in Chapter 5 (and also in Chapter 2), the use of regional windows is of particular importance in Germany, and detailed legislation and case law dealing with the use of regional windows for both programming and advertising purposes has proven influential in shaping the regional audiovisual media sector.

In Italy, the PSB is subject to legislative and contractual obligations to guarantee an adequate service of information at a regional and provincial level. The PSB channel *RAI 3* uses regional windows for broadcasting local information and programming, and its approach includes strategies for the dissemination of some regional content beyond its target area (see further, Chapter 6).

Recent legislative changes in the Netherlands provide for the establishment of a new, centralised body (*Regionale Publieke Omroep* – RPO) to be responsible for public service regional broadcasting in the country (thereby replacing the foundation that until now played a facilitative role *vis-à-vis* regional broadcasters). The RPO will be awarded an exclusive concession for 10 years to provide regional public service broadcasting; Chapter 7 sets out the conditions and review mechanisms governing the operation of the RPO.

Historically, the French audiovisual landscape has featured a highly centralised model favouring national channels with local variations rather than a rich offer of local and regional channels. This tendency began to be reversed in the early 1980s in parallel with the process of territorial decentralisation and more particularly the development of terrestrially-broadcast digital television (DTTV), which made a real boom in local and regional channels possible in France (see Chapter 8). The Spanish system for regional audiovisual media is influenced by the country's political structure of autonomous communities. An interesting feature of the Spanish system, resulting from legislative changes in 2012, is the provision that allows the autonomous communities to provide for public service broadcasting or alternatively to issue a call for tenders to award the licences to commercial broadcasters. This creates space for the exploration of public-private models for regional broadcasting. The Spanish system has also been defined in recent years by the sweeping financial cutbacks that have been a major factor in the closure of regional and local broadcasters (for details, see Chapter 9).

In Switzerland, reflection and discussion on the future of public service media, including at the regional level, are advanced. As is set out in detail in Chapter 10, local and regional audiovisual media in Switzerland are subject to various obligations relating to their coverage area and concerning information transmissions during primetime. They enjoy must-carry status and as a result of a recent legislative amendment, they have been given an increased share of the revenue generated by the broadcasting licence fee.

In the United Kingdom, the regional broadcasting system is structured around the devolved nations - Northern Ireland, Scotland and Wales - and the nine government administrative regions in

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[28] For a more comprehensive overview, see: EPRA, "Ad hoc Working Group 3: Local/Regional TV: Financing Models - Background Comparative Document", December 2015,
http://epra3-
production.s3.amazonaws.com/attachments/files/2718/original/Local_regionalTV_financing_models_WG3_final.pdf?1450254242.

England. Regional broadcasting is assured first by BBC 1 – a networked channel throughout the regions comprising BBC Northern Ireland, BBC Scotland, BBC Wales and 12 regional windows in England. It is governed by the Royal Charter, which is currently under review. Regional broadcasting is assured secondly by ITV/the so-called Channel 3 licences: private broadcasting licences that contain a number of public service obligations, including regional production. In addition, S4C broadcasts nationally in Welsh and in Scotland, BBC Alba - a joint venture between the BBC and MG Alba – broadcasts in Scottish Gaelic. As explained in Chapter 11, legislation also provides for electronic programme guides to give prominence to local television services.

Part III focuses on the challenges facing regional audiovisual media, in particular their quest for continued sustainability in the context of expanding technologies and diminishing income. The conclusions bring together and consolidate the various strands of the publication.