DEBATING THE NEW NOTION OF THE MEDIA

IN THE BULGARIAN MEDIA ECOSYSTEM

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ABSTRACT

Since the turn of the century the ICT developments caused significant transformations in contemporary media ecosystem. The convergence of media, however, requires regulation to achieve a balance between access to online content services, consumer protection and competitiveness. As part of the Digital Single Market strategy, the European Commission revised in November 2018 the existing Audiovisual Media Services Directive as a media regulatory framework for the 21st century. The adopted new rules created a fairer regulatory approach for the entire audiovisual sector, including not only the traditional TV broadcasters and video on-demand services but also the video sharing platforms.

The aim of the proposed paper is to determine the extent of the applicability of the criteria and the standards outlined in the Council of Europe’s Recommendation on a New Notion of the Media (2011) in the contemporary communication environment in Bulgaria. In order to do that, quantitative and qualitative social surveys were conducted in December 2018/February 2019 among journalism students, media practitioners and media experts. The main research question was to find out to what extent the global challenges of ICT have impacted the national media performances in the new ecosystem, which encompasses the interaction of all actors and factors for allowing the media to function and to fulfil their role in society. The results of the surveys outline the basis of discussion and analysis of the media trends in the country in multi-layered aspects.

Keywords: Media ecosystem, ICT, CoE CM/Rec(2011)7

1. INTRODUCTION

In the 1930s, Aldous Huxley warned in his Brave New World that time would come when mankind may die uninformed, wallowing in a sea of information (Huxley, 1932). That time may not have come yet, but it is a fact that we find it ever more difficult to deal with the
quantity and quality of information. And all this makes ever more obvious how compression of historical time dictates the new pace of the communication process in the new Babylon tower with the good, the bad and the unexpected challenges of ICT.

Contemporary societies are undergoing significant social, economic, cultural, and political transformations, which correlate with the dynamic developments of the ICT environment. Today, these transformations are being catalyzed by the intense development of the media ecosystem, combining the traditional media with the potential of the blogosphere, the social networks, and the mobile communication technologies. The netizens, i.e. the citizens of the Net (Hauben, 1995) represent the new globalized way of communication. Situated in the context of globalization processes, the media themselves are undergoing multi-layered transformations; they change with the dynamic developments taking place in technologies, business models, regulatory policies, professional practices, and the behavior of the audiences.

Media remain the most important instrument to promote freedom of expression in the public sphere – an irrevocable condition for the democratic order of society. Actuated by their mission to inform, they stimulate public debates, shape public opinion, promote values and strengthen transparency and accountability of the institutions and businesses, offer educational, entertaining and cultural forms of expression. The power of media, however, can be misused to the detriment of pluralism and democracy.

The rapid developments of information and communication technologies greatly influenced the transformation of the media - from linear to non-linear services, and the audiences - from passive consumers to active prosumers (producers and consumers). And if the processes of politicization of the media and mediatization of politics are most closely associated with the traditional media (print, radio and television), the online media space (social networks, blogs, vlogs, etc.) makes the audiences active participants in the communication process. Thus, in the new media ecosystem people can enter an unmediated, direct dialogue. While traditional media can rely on codes of ethics, self-regulation and co-regulation in compliance with professional principles, the content in the online environment can hardly be regulated and it is difficult to organize public correction of the politics (Raycheva, 2014).
Among the multifaceted attention to the democratic functioning of the media, two are the essential documents that are directly relating to their regulation on pan-European level since 1989: The European Convention on Transfrontier Television (ECTT) of the Council of Europe and the Audiovisual Media Service Directive (successor of the Television without Frontiers Directive 89/552/EEC) (AVMS Directive) of the European Union.

The aim of the ECTT and the amending Protocol is to facilitate, among the Parties, the transfrontier transmission and the retransmission of television program services. It lays down a set of minimum rules in areas such as the responsibility of broadcasters in regard to programming matters, including the European content of programming; advertising, teleshopping and sponsorship as well as the protection of certain individual rights. Application of the ECTT mostly relies on mutual co-operation between the Parties (Council, 1989).

The European Convention on Transfrontier Television and the amending Protocol, on the one hand, and the newly adopted Audiovisual Media Service Directive, on another, have similar objectives, although the intention of the AVMS Directive as an instrument of the European Commission is to create a common market in broadcasting.

The AVMS Directive offers an updated and comprehensive legal framework that covers all linear (broadcasting) and non-linear (on-demand) audiovisual media services, as well as provides less detailed and more flexible regulation and modernizes rules on TV advertising to better finance audiovisual content. The AVMS Directive also upholds the basic pillars of Europe's audiovisual model, such as cultural diversity, media pluralism, protection of minors, consumer protection, and intolerance of incitement to racial and religious hatred. It acknowledges that “Audiovisual media services are as much cultural services as they are economic services. Their growing importance for society, democracy – in particular by ensuring freedom of information, diversity of opinion and media pluralism – education and culture justifies the application of specific rules to these services.” In particular, the new Directive underlines the importance of promoting media literacy, development of which can help people “exercise informed choices, understand the nature of content and services and take advantage of the full range of opportunities offered by new communication technologies” (European, 2007). Thus, they will be better able to protect themselves and their families from
harmful or offensive material.

As part of the Digital Single Market strategy, the European Commission revised in November 2018 the existing *Audiovisual Media Services Directive* as a media regulatory framework for the 21st century. The adopted new rules created a fairer regulatory approach for the entire audiovisual sector, including not only the traditional TV broadcasters and video on-demand services but also the video sharing platforms. The member-states have two years to implement these new rules in their national legislature.

The field both of the *ECTT* and the *AVMS Directive* is very flexible and dynamic and the work on their improvement is an ongoing process. Therefore, it is of particular importance in the digitalized modernity to define what is meant by the concept “media”. On September 21, 2011, after an extensive analytical preparation, the Committee of Ministers adopted a recommendation to the member states of the Council of Europe to accept a new, wider concept about the essence of media.

The aim of the proposed paper is to determine what is the extent of applicability of the criteria and standards outlined in the Council of Europe’s *Recommendation on a New Notion of the Media* (2011) in the contemporary communication environment in Bulgaria. Methodologically, in order to do that, quantitative and qualitative social surveys were conducted in December 2018/February 2019 among journalism students, media practitioners and media experts. The main research question was to find out to what extent the global challenges of ICT have impacted the local media performances in the new ecosystem, which encompasses the interaction of all actors and factors for allowing the media to function and to fulfil their role in society. The results of the surveys outlined the basis of discussion and analysis of the media trends in the country in multi-layered aspects.

2. SETTING THE CONTEXT

Late modernity is marked above all by the information revolution and the increasing privatization of services. These traits are built into the foundation of postmodern consumerism (Bauman, 1998). New “risk societies” were born (Beck, 2007), whose reflexivity in the ubiquitous global communication streams is based on the circulation of information through
networks of users and intelligent machines (Lash, 2002). In the framework of transnationality and consumerism, and with the development of nuclear and electronic technologies, what has acquired increasing importance is the marketing and the sale of goods and services – rather than their production.

Entertainment shapes a new show world in which the production of stereotypical images offered by Walt Disney-type industry, or the “McDonaldization” of culture in general and of television in particular, tends to bring about a shift from the traditional values of content towards reduced importance of the aesthetics in audiovisual form. Scholars have begun to compare the effects of globalization and glocalization*. George Ritzer (2007) indicates the difference between these two neologisms, related to the projection of the global on the local in the material, economic, spiritual and aesthetic aspects. Is this not a sort of reference to Max Weber’s “rationalization” (1998), which Weber originally related mostly to politics and economics?

In hypermodern times, when technologies are revolutionizing culture, which “is no longer in the representations but in the objects, the brands and the technologies of information society” (Lash, 2002), information and communication defines the parameters of the mediatized society (Peicheva, 2011).

The modern globalization processes, based on the impetuous development of information and communication technologies (ICT), have confronted humankind with the challenges that arise from social transformations and the impact of those transformations. Until recently, the one-way communication model of traditional mass media (press, radio, and television) was predominant, but now, real alternatives to it are provided by the developing of multi-directional communication models based on the interactivity of the global digital network. The ending of the analog TV broadcasting was accompanied by a number of

* Grobalization (grobalization = growth + globalization) allows the expansion of ideas to fit the norm of the nation in order to increase their power, influence and profits. Glocalization (glocalization = local + globalization) is the interpretation of the global and the local, resulting in unique outcomes in different geographic areas. In: Grobalization vs Glocalization, 2011. http://rickleger.wordpress.com/2011/01/04/grobalization-vs-glocalization/
innovations in the field of communications: Facebook appeared in 2004; Twitter, two years later, in 2006; Instagram, in 2010. You Tube, the most popular site for video sharing until now, was created in 2005. The Smart Phone has been on the market since 2007, and iPad, since 2010. The Y and Z generations of the so-called “digital natives” (according to the classification of Mark McCrindle and Emily Wolfinger), i.e. those born after the 1980s, are setting the new trends of the communication process and its technological platforms.

Provoked by the achievements of the so-called second generation of the web-based service Web 2.0, which includes social networks, blogs, folksonomies, and other instruments of communication for joint work and exchange between users, the interaction and co-participation between multiple new individual producers of content is growing exponentially. In supplying practically unlimited possibilities for commenting and a variety of alternative sources, they are seriously gaining the audience territory of the traditional media organizations. In seeking a balance between different platforms, the parameters of the mutual influence between them and society are yet to become clear.

Gathered virtually, participants in social communities organize themselves horizontally. While there is an evident tendency for demassification of the audiences of the hierarchically structured traditional media, the mediatization of the online contributions of fragmented audiences may vary instantly from mass consolidation to complete breaking apart. The “net”, as defined by Francis Fukuyama, is different from hierarchy because it is based on common informal norms, not on formal leadership relations. In this sense, the net may exist in parallel with formal hierarchy (Fukuyama, 1999). Although it is very hard to attain the objective truth about certain topics in the Internet space, the Web can satisfy even the most whimsical needs of users within some of the four categories of websites classified by Marc Deuze: news; indexation and categorization; metadata and commentary; and sharing and discussion (Deuze, 2003: 356).

In a situation of multi-channel, convergent and cross-media environment, the audiences receive audiovisual materials from different, interacting suppliers. The same content offered through linear and non-linear services reaches users under different conditions of perception. The qualitative and quantitative approaches to the organization and dissemination of this
content, and the modes of formation of its audiences, also differ. The abundance of diverse information offered to users requires a flexible daily response with regard to the content itself and also with regard to how it is communicated both to more compact and to individual audiences. Media convergence is situated in the field of technological innovations, of computer-mediated communication, and of social networks, and it pushes civic participation and transnational cultural dialogues away from the area of the widespread trend of individual communication.

Torn apart between their commercial and political functioning, and restricted by the specificity of their outward form, the traditional media gradually but steadily cede their audiences to the Internet environment. And that environment is changing genealogically.

Among the many definitions of media, the prevalent one defines them as means for transmission of information to multiple recipients. This includes not only the traditional media (radio, television, press) but also films, books, disks, products with wideband technology services and Internet, etc. (Ellmore, 1992).

Dennis McQuail has outlined the structure-defining conditions for a free and healthy media environment. They include: absence of censorship, licensing or other control mechanisms exercised by the executive power; equal opportunities of all citizens for media access; independence from control or intervention by owners, political or economic interests; competitiveness of the system, with restrictions on concentration and cross-media ownership; freedom of the media to acquire information from reliable sources (McQuail, 2005:193).

Manuel Castells asserts that “on the one hand, the media must be close to politics and management – close enough to have access to information, to benefit by regulations, and in many countries, to receive substantial subsidies. On the other hand, they must be sufficiently neutral and distanced to maintain their credibility and act as mediators between citizens and parties in the production and consumption of information streams and images that are at the core of public opinion formation, voting and political decision making” (Castells, 2006).

The specificity of the modern information and communication environment imply a change in the concept of media. In 2009, in his comprehensive report to the Conference of Ministers Responsible for Media and New Communication Services (organised by the Directorate
General on Human Rights and Rule of Law Legal Issues), Karol Jakubowicz outlines the evolution of the concept of media. Thus, in *Recommendation No. R (99) 15 of the Committee of Ministers to Member States on Measures Concerning Media Coverage of Election Campaigns*, only two media are referred to – printed and electronic (Council, 1999). Less than a decade later, in the similar *Recommendation CM/Rec (2007) 15 of the Committee of Ministers to member states on measures concerning media coverage of election campaigns*, special attention is devoted to clarifying the term “media”. This term is said to refer “to those responsible for the periodic creation of information and content and its dissemination over which there is editorial responsibility, irrespective of the means and technology used for delivery, which are intended for reception by, and which could have a clear impact on, a significant proportion of the general public. This could, inter alia, include print media (newspapers, periodicals) and media disseminated over electronic communication networks, such as broadcast media (radio, television and other linear audiovisual media services), online news-services (such as online editions of newspapers and newsletters) and non-linear audiovisual media services (such as on-demand television)” (Council, 2007). The *Directive for Audiovisual Media Services*, in seeking a new, more comprehensive, technologically neutral definition of media, devotes considerable space to defining linear and non-linear audiovisual media services (European, 2007).

In 2011, a *Recommendation on a New Notion of Media* was adopted by the Council of Europe Committee of Ministers responsible for media and new communication services (this recommendation followed the eponymous Council of Europe Resolution of 2009). The *Recommendation* outlines the basic directions for bringing up to date the current views on the nature of the medial environment.

The *Recommendation* addresses the member states that they should “adopt a new, broad notion of media which encompasses all actors involved in the production and dissemination, to potentially large numbers of people, of content (for example information, analysis, comment, opinion, education, culture, art and entertainment in text, audio, visual, audiovisual or other form) and applications which are designed to facilitate interactive mass communication (for example social networks) or other content-based large-scale interactive
experiences (for example online games), while retaining (in all these cases) editorial control or oversight of the contents”.

The Recommendation emphasizes the unchanging goal of the media, or of mass communication services similar to the media, to provide or disseminate information, analyses, commentaries, opinions, and entertainment to a wide audience, and it offers six criteria, together with respective indicators for clearly assessing their parameters: media profile of the Internet; goal and tasks of the media: production and generation of media content; professional standards; dissemination; audience’s expectations. Indicators are also proposed for the standards of media activity in the modern media ecosystem, i.e., for the connection between blogs and the traditional journalism; the indicators are focused on their rights, privileges and prerogatives, as well as on media pluralism and content variety (Council, 2011).

2. METHODS

The aim of the proposed paper is to determine the extent of the perception of the criteria and standards outlined in the Council of Europe’s Recommendation on a New Notion of the Media (2011) in the contemporary communication environment in Bulgaria.

In order to understand the current conceptualisation of media ecosystem, we triangulated different research methods: individual direct closed questionnaire among journalism students, supplemented by open questions on important media issues; a focused interview with open and closed questions to media professionals; and expert’s evaluation.

The individual direct questionnaire among students N=100 was conducted at the Faculty of Journalism and Mass Communication of the St. Kliment Ohridski Sofia University. In addition to the 24 closed questions the students were asked in 4 open questions for their opinion on the specifics of the media ecosystem. The content of these responses has been analyzed in order to understand how young people frame this topic. The most relevant categories of discourse have been discussed with them. The same questionnaires were sent also to journalists from the media and experts. The results of those, who responded, were used to compare with students' responses.
Furthermore, the focused interview with 9 closed and 3 open questions was conducted with media professionals, self-selected on the basis of their spontaneous interest and willingness to participate in the research. Responses were collected from 12 media practitioners: N=3 (press), N=3 (radio), N=3 (TV), and N=3 (online).

The experts’ evaluation was collected from 12 University media professors, media executives, and media regulators.

Among the contributors as experts or journalists are: Dobrinka Peicheva, Petko Todorov, Polya Ivanova, Simeon Vassilev, Valery Marinov, Valeriy Todorov, Vessislava Antonova. The majority of the respondents, however, preferred to express their opinions anonymously.

The individual direct questionnaire, the focused interviews and the experts’ evaluations were conducted in the period of December 10, 2018 – February 10, 2019.

The opinions of all the approached respondents, needed for the analysis of the developments of the media ecosystem in Bulgaria were organized along two strands:

1. Media criteria and indicators – the six criteria of the Recommendation, each supplemented by a set of indicators, needed for identifying media and media activities in the new ecosystem: intent to act as media; purpose and underlying objectives of media; editorial control; professional standards; outreach and dissemination; public expectation.

2. Standards applied to media in the new ecosystem: rights, privileges and prerogatives; media pluralism and diversity of content; media responsibilities.

Although many aspects of the collected information might be discussed, in this paper the analysis is limited only to some of the most relevant issues outlined by the respondents.

According to the I/11 of the preliminary remarks to Part I: Media criteria and indicators of the Recommendation “not all criteria carry equal weight”. That is why the focus of the discussion is put on criterion 2 (purpose and underlying objectives of media), criterion 3 (editorial control), and criterion 5 (outreach and dissemination). Their absence, according to the Recommendation, is considered a good reason “to disqualify a service from being regarded as media, but may carry considerable weight if they are present” (Council, 2011).

2. Regarding Part II: Standards applied to media in the new ecosystem, the discussion is focused on the indicators concerning media pluralism and diversity of content: management
of scarce resources; transparency of ownership, and public service media.

The results of the conducted surveys outline the basis of discussion on the *Recommendation*, as well as the analysis of the media trends in multi-layered aspects.

3. RESULTS

The purpose of the conducted quantitative survey was to determine the extent to which the applicability of the Council of Europe’s criteria and standards for definition of the concept of MEDIA is accepted in the contemporary Bulgarian communication environment.

The majority of responses, for the both parts of the *Recommendation: Media criteria and indicators* and *Standards applied to media in the new ecosystem*, of all respondents tend to the consent with the most of the indicators.

37% of the students, 41% of the journalists, and 48% of the experts state that they accept the applicability of all six criteria and three standards, and respectively 32%, 16% and 41% accept it to a great extent. This means that in the online environment, although with insufficient theoretical training and scarce professional practices, the majority of the students, similar to the journalists and the experts, have the ability to distinguish between different media and recognize the principles of their functioning. Only for 3% of the students and 1% of the experts it is difficult to make this difference. Journalists do not experience such difficulty (Graph 1).

![Graph 1. Media criteria and indicators and Standards applied to media in the new ecosystem](image-url)
Qualitatively, most of the interviewed journalists find that the Recommendation is a timely move to clarify the essential characteristics of the contemporary media ecosystem. Generally, they believe that the applicability of both criteria and standards is possible in practice, although some are skeptical about the policies of the media owners regarding the media independence.

The experts mostly assess positively both criteria and standards of the Recommendation. One expert’s assessment focuses on the commitment to conventional standards as a main measure for relevant affiliation to the media ecosystem. According to the assessment of another expert, the human being, the value system, the information needs should be in its center.

Further on, both in quantitative and qualitative terms, the views of the respondents are represented separately on criteria and standards.

Media criteria and indicators

A universally recognized and undeniable feature of media is their role in society and their impact on it, as well as their attitude towards democratic processes. In fact, all kinds of content provided by the media have a potential impact on society.

The Recommendation sets out six criteria for the impact of the media on society, with the proviso that its assessment may be too subjective and should not be considered a determining factor. The criterions are: intent to act as media; purpose and underlying objectives of media; editorial control; professional standards; outreach and dissemination; public expectation.

Respondents’ responses are very close to each other.

48% of the experts are the most convinced of the applicability of the criteria of the Recommendation and the opinions of the students and journalists are equal – 35%. High are also the preferences for the response “agree to a great extent” - 33%, 24% and 47%, respectively. Disagreement is almost negligible for all – this answer is valid only for 3% of the students and 1% of the experts.

The most convinced - 48% of the Recommendation criteria are the experts, with the
opinions of the students and the professionals equaled - 35% (Graph 2).

Graph 2: Media criteria and indicators

Interesting are the results of the respondents’ comments on the six separate criteria.

1.1. Criterion 1 - Intent to act as media
Although the stated intention to act as media by itself is an important criterion, it alone is not sufficient for a participant or services offered or products to be treated as media. Among the important factors for recognizing the media are: the adoption of editorial policy; commitment to professional or ethical media standards; production or dissemination of a typical media content to the general public (for example information, analyses, opinions/comments, education, culture, art and entertainment) in a textual, audio, visual or audio-visual form.

For the assessment of this criterion the Recommendation specifies 4 indicators: self-labelling as media; typical for media working methods; commitment to professional media standards; practical arrangements for mass communication.

The discrepancy in the responses here is serious. 31% of the experts agree entirely with the applicability of this criterion, placed first in the Recommendation. Their optimism is also reflected in the response: “agree to a great extent” - 63%. Students’ opinions (21%) are close to those of the journalists (25 %). The response “agree to a great extent” for these two groups is respectively 34% and 17%. Media professionals’ responses are as follows: 33% “agree to a
The focused interviews present some more details of the attitudes of the media practitioners towards the applicability of this criterion. For one of the journalists, most important to the functioning of the contemporary media ecosystem are responsibility, credibility and objectivity. For another journalist, most important are transparency and professionalism, pluralism, and respect for ethical standards. A third journalist, however, states: “This criterion is hardly applicable because it implies a high degree of lacking to the guild self-assessment”.

Overall, experts are more positive on the applicability of this criterion. In his assessment of this criterion one of the experts noted: “The intention to act as media requires, above all,
commitment to the professional media standards, the presence of a clear and publicly visible editorial policy, firm upholding of the principles of pluralism, and respect for the professional and ethical standards. Media imply responsibility and transparency”.

1.2. **Criterion 2 - Purpose and underlying objectives of media**

Media are the most important means of freedom of expression. Regardless of the changes in the media ecosystem, the purpose and the resulting media outcomes as a whole remain unchanged, more precisely - the provision and dissemination of content to the general public and the provision of space for different interactive practices.

The *Recommendation* foresees for the assessment of this criterion 4 indicators: produce, aggregate or disseminate media content; operate applications or platforms designed to facilitate interactive mass communication or mass communication in aggregate (for example social networks) and/or to provide content-based large-scale interactive experiences (for example online games); with underlying media objective(s) (animate and provide a space for public debate and political dialogue, shape and influence public opinion, promote values, facilitate scrutiny and increase transparency and accountability, provide education, entertainment, cultural and artistic expression, create jobs, generate income - or most frequently, a combination of the above); periodic renewal and update of content.

Interesting are also the responses for the second criterion (one of the three essential ones for the originators of the *Recommendation*). There is an approximate consensus among all respondents on its applicability: students - 39%, journalists - 33%, and experts - 38%.

The results for those who responded “agree to a great extent” are as follows: students - 33%, journalists - 42% and experts - 56%. The activity with resulting media outcomes is the most essential indicator in the assessment of this criterion by the students. The skepticism of one quarter of the journalists is a bit striking – for 25% of them this criterion is applicable to a moderate extent. Their responses, however, are logical – in fact, they are those who actually work in the conditions of the creation of media content, and these conditions are not clearly outlined in the Bulgarian media reality (Graph 4).
Graph 4. Criterion 2 – Purpose and underlying objectives of media

The focused interviews with some of the journalists clarify the reasons for their doubts about the applicability of this criterion – in recent years there has been a tendency towards the problem of the freedom of expression of the media environment. According to the 2018 Press Freedom Index, Bulgaria ranks 111-th out of 180 countries in the world (Reporters, 2018). One of the journalists states: “This criterion can be fulfilled with a certain degree of success. Purposes are sometimes distorted by the pressure of everyday practices, and the final results cannot always be achieved correlatively to the purpose because of the multiple factors of influence and the fragmentation of the communication process”.

On the contrary, the experts seem more optimistic. For one of them, assessing the modern media ecosystem in Bulgaria, the production, composition and dissemination of the media content is of particular importance. For another expert “the main purpose is to create media content that: contributes to a reliable information to the public about important events and facts, and the resulting opinions; to be a fair mediator and to provide space for public debates along with the relevant analyses; to create prerequisites for dialogue between society and politics in terms of transparency and accountability; to promote values, education and culture; to facilitate communication with platforms and applications”.

1.3. **Criterion 3 - Editorial control**

Editorial freedom or independence is a vital requirement for the media and a direct consequence of the freedom of expression, right to opinion and the right to receive and impart information guaranteed by Art.10 of the ECHR. In that context, according to the *Recommendation*, a provider of intermediary or ancillary service that contributes to the functioning or access to the media but does not itself exercise editorial control and thus has a limited or no editorial responsibility at all should not be considered as media.

Four are the indicators, according to which the applicability of this criterion is verified: editorial policy; editorial process; moderation; editorial staff.

This criterion is also one of the essential ones for the originators of the *Recommendation*. Journalists are strongly convinced of the applicability of this criterion – 67% agree entirely and 33% - agree to a great extent, experts – respectively - 56% and 44%. Still inexperienced media students are more cautious – 37% of them agree entirely and 35% - to a great extent. Among all the respondents only students have doubts about the applicability of this criterion to the editorial policy and the editorial process implementation team qualities. Namely, students mark the editorial process as the most essential indicator for this criterion. (Graph 5).

![Criterion 3 – Editorial control](image-url)

Graph 5. **Criterion 2 – Purpose and underlying objectives of media** Editorial control
The answers in the focused interviews highlight the strong support of the journalists for all four indicators of this criterion. Editorial responsibility is largely accepted as an important criterion for determining the essence of the media functioning.

Similar is the assessment of the experts. In his opinion one of the experts emphasizes that editorial process is the most important for meeting this criterion. For another one “Society must have a clearly stated editorial policy of the relevant media and its carriers in the face of the editorial staff. This is a guarantee of the respect for the professional and ethical standards, as well as for compliance with the media legislation, the principles of pluralism, credibility and accountability and non-admission of censorship”.

1.4. **Criterion 4 - Professional standards**

Of particular importance for the functioning of democracy is the trust in the competence and professionalism of the media.

Four indicators are specified for the assessment of the applicability of this criterion: commitment; compliance procedures; complaints procedures; asserting prerogatives, rights or privileges.

It is noticeable that journalists are not very enthusiastic about the applicability of this criterion: 25% of them accept it fully, to a great extent – 17%, and to a small extent – 3%. This is somewhat odd, considering that they must respect the professional standards as an important mechanism of the self-regulation. Possible cause for their skepticism is the instability and vulnerability of the media environment in Bulgaria where they work. Indicative is also their unwillingness to give any response to this criterion – 17%. Experts are more optimistic – 44% of them agree entirely with the applicability of this criterion and 50% prefer the answer “agree to a great extent”. For students, this preference is 32%, as 31% agree entirely that the criterion is applicable in practice. What kind of metamorphosis would some of them face in the future when they enter the media profession if they begin to falter while respecting the basic requirements for the profession? For them commitment is the most important indicator of the applicability of this criterion in practice (Graph 6).
Commitment of journalists to respect the professional standards is mainly expressed through the mechanism of self-regulation. Interaction with structures of the non-governmental sector in the form of co-regulation also contributes to strengthening the foundations of democracy. Some media have reinforced this trend through their own internal codes of practice. The compliance with professional ethics, deontology and rules is a strong criterion for defining a structure as media. One of the journalists states: “It depends on the degree of application of the indicators specified. If they are established in the public interest and with the necessary financial resources, then the professional standards can be easily covered. Usually this is achieved with good funding”.

The assessment of the applicability of this criterion is generally positive. One of them states: “All these conventional standards are obligatory for the equilibrium of the media ecosystem and for the sustainable positioning of any media in it”. Other expert’ opinion is: “In order to be committed to professional and ethical standards, the media must have a procedure in place to comply with the standards, which includes also a way of dealing with complaints and violated rights”.

1.5. Criterion 5 - Outreach and dissemination

Media or mass communication is referred to as mediated publicly-focused public communication opened to all. According to the Recommendation the outreach or the actual
dissemination (circulation, number of viewers or users) is therefore an important indicator of identifying what a media is and how it is distinguished from private communication, including the one that is carried out in the public space (which is not a media itself but can be incorporated in the media or mass communication in its aggregate). Technologies that enable non-linear or on-demand content delivery, conditional access, separation of electronically transmitted content, personalization of content or unicasting delivery, give a different dimension of the concept and thus give a new dimension of the mass communication. The same ability to maintain the full (one to many, many to many), group (several to several) or private (one to one) outreach of communication with the public has also Internet. But the fact that such communication is developing on the Internet (public space) does not necessarily mean that it is media.

The new ecosystem, variable in its nature, creates the possibility the media to function easily within other media or to superimpose one over the other for platforms, thus sometimes overlapping the boundaries between each other. It is important that their respective roles differ so that their respective responsibilities are also recognized. According to the Recommendation if the outreach and dissemination are limited, the service should not be considered as a media one. That is why it is recommended that for an assessment of outreach, attention should be paid to the aggregated audience, namely all those sharing the platform or common features of the service and who can be reached by the content produced, arranged, selected, aggregated or distributed by the operator, including when the delivery of or access to content is not simultaneous.

Three are the indicators that are essential for the assessment of the criterion applicability: actual dissemination; mass-communication in aggregate; resources for outreach.

This is the third criterion that, according to the originators of the Recommendation, if not implemented, would disqualify the service as a media one. The responses are very different again. The journalists’ opinions about the applicability of this criterion are equally divided among the opportunities for „agree entirely” - 33%, to „agree to a great extent” – 33% and agree to a moderate extent 33%. In general, experts accept this criterion positively. The students’
opinions are the most diverse. They have indicated as the most essential for the applicability of this criterion the indicator relating to resources to achieve the outreach (Graph 7).

Graph 7. Criterion 5 – Outreach and dissemination

The majority of the journalists expressed their opinion in favor of the applicability of this criterion. One of the journalists stated: “With so much feedback, dissemination management and technologies available, this criterion is achievable”. Some of the media professionals, however, were concerned about the sustaining of the copy- and neighboring rights when disseminating content on different platforms.

As for the expert’s assessments they were mostly concentrated around the resources of dissemination as a major prerequisite for actual dissemination.

1.6. Criterion 6 - Public expectation

In general terms, people recognize media and rely to a great extent on them for information and other content, expecting content to be created according to the relevant professional standards. In a democratic, convergent environment, users rely on the existence of multiple sources of information, i. e. of external pluralism and expecting content to be diverse and to match the interests of the different segments of society, i. e. to fulfill the parameters of the internal pluralism. These factors help to win the trust of the audiences. The Recommendation notes that expectations in respect of public service media are higher than in respect of certain other media. People even have expectations as regards content of a commercial nature, which are higher in
respect of media or media content designed for minors. News media will naturally be expected to be regularly updated and disseminated periodically. However, the Recommendation warns that higher levels of expected trustworthiness, standards, transparency and accountability do not necessarily bring about higher outreach, dissemination or impact.

The applicability of this criterion is assessed by 5 indicators: availability; pluralism and diversity; reliability; respect for professional and ethical standards; accountability and transparency.

The experts are the most explicit in the support of this criterion – 75% accept this thesis entirely and the remaining 25% - to a great extent. 51% of the students also choose the response “agree entirely”. For them availability and pluralism and diversity are the two indicators equally important in assessing the applicability of this criterion. Journalists are skeptical again – 27% accept the applicability of this criterion entirely and 27% - to a moderate extent. It is significant that one third of them left this question without any response (Graph 8).

**Graph 8.** Criterion 6 – Public expectation

Most of the answers of the journalists are focused around the applicability of the indicator regarding the respect of professional and ethical standards. For one of them, the most important is the commitment to society and professional ethics, along with the respect for the professional standards at work. For another journalist “this is a subjective criterion – depends on the degree of the desire to be achieved, as well as on the role of the market and, as part of it, on the role of
the niche of the media, and location of the media as factors influenced by the business model and financial flows”.

The media experts mostly support the applicability of this criterion. In his assessment one of them asserts that “apart from accountability/responsibility, pluralism, reliability, transparency, etc., which are important features and requirements for any social ecosystem, for the media one the most relevant are considered to be: the search for and the reflection of the truth, verifiability of the sources, as well as the search for different points of view on specialized topics, including political issues”.

2. Standards applied to media in the new ecosystem

While the criteria outlined in the first part of the Recommendation are expected to meet the challenges of time because of their broad nature, the second part is more pragmatic and can be further developed, adapted or reviewed periodically depending on the changes in the media ecosystem. In principle, media and journalists respect the general rules of the civil, commercial, tax or criminal law. It is possible, however, some general provisions to be interpreted specifically for them (for example: offense and defamation; surveillance and search; state secrecy; corporate secrecy) or their application to be critically monitored to avoid its wrong usage with a view to a covert violation of freedom of expression.

Thus, at the end of 2018, in Bulgaria, amendments are voted to the Law on the Compulsory Deposit of Printed and Other Works and the Announcement of Distributors and Media Service Providers (Bulgarian, 2018). In the basis of the proposed changes to the Law is the introduction of an obligation for media service providers (printed, electronic and online media) to annually declare any funding they received in the previous calendar year, including loans, bank credits, as well as free receipt of cash and property. Declarable are the amount of the funding, its basis and details of the person who provided it. It is also foreseen to declare financing from European funds for the previous year. The Law requires all media service providers to declare also information about the actual owner, as well as whether he/she is a public person/official and whether he/she has a verdict enforced. In the public debate on the draft law, carried out in September, part of the representatives of the smaller and regional media
pointed out that the amount of the sanctions is large and that could lead to bankruptcies of small media. The importers of the law replied that the meaning of the sanctions is not so much to be collected but rather to serve as prevention.

In this part of the Recommendation three standards are outlined: rights, privileges and prerogatives; media pluralism and diversity of content; media responsibilities. The purpose is to provide guidance to those involved in media policy how to apply the media standards in a gradual and differentiated manner regarding the new media reality, new services or new entrants. Permanent basis for the implementation of the Recommendation is proposed so that the Member States to be involved in a dialogue with all the participants in the ecosystem and to be properly informed about the applicable law. Important is also that the media should be helped in their attempts to self-regulation.

Most convinced of the applicability of the standards of the Recommendation overall are the experts (64%), followed by the journalists (45%) and the students (43%). Similarity is observed in the responses “agree to a great extent”, respectively - 29% - for the students, 25% – for the journalists and 27% - for the experts. Disagreement is almost negligible for all – only for 3% of the students and 2% of experts this response is valid. Indicative is that a large proportion (38%) of the journalists left this issue without any response (Graph 9).

![Graph 9 Standards applied to media in the new ecosystem](image-url)
For most of the journalists in the contemporary media ecosystem consisting of professionally content creating and disseminating media, private and public, it is important these to have transparent ownership and provide freedom of speech, pluralism, and respect for ethical standards.

Most of the experts’ opinions were concentrated on media freedoms, editorial independence, and editorial responsibility. One of the experts, however, binds advertising to the transparency of ownership and is skeptical about the functioning of the media according to professional standards in such interdependence.

The respondents’ opinions on the three separate standards provide an interesting material for debate.

2.1. Rights, privileges and prerogatives

Freedom of the media is directly linked to freedom of expression and the right to disseminate content. Respect for editorial independence requires absence of censorship and protection from self-censorship, but also an effective and apparent separation of the ownership or the media control and decision-making regarding the content. This is essential both for the creators and the content disseminators.

The indicators here cover a wide range of media rights: media freedom and editorial independence; freedom from censorship; protection against misuse of defamation laws and risk of chilling effect; right to investigate; protection of journalists and journalistic sources; fair access to distribution channels; intermediaries and auxiliaries.

The discrepancy in the responses here is serious. Experts welcome the possibility of applying this standard, which is placed first in the Recommendation. Half of them (50%) are fully convinced of this. Their optimism is also reflected in the following response – “agree to a great extent” - 43%. Students give balanced responses – 43% agree entirely with the applicability of this standard and 30% “agree to a great extent”. When evaluating the applicability of this standard, they first noted the right to investigate, and second, fair access to distribution channels. Although media professionals are predetermined to comply with the journalistic standards, 38% of them haven’t responded, but 52% accept that this standard is
applicable in practice (Graph 10).

**Graph 10. Rights, privileges and prerogatives**

According to the *Recommendation*, significant is the role of the intermediaries, too. By offering alternative and additional means or channels to disseminate media content in a market of competitive intermediaries and service providers, they broaden the outreach of the audience and can significantly reduce the risk of government intervention. But also there is a risk of censorship in the new media ecosystem, triggered precisely through them. All media should be protected from pressure, politically motivated or resulting from economic interests.

The media professionals assert that media right to investigate and to protect journalists and their sources is essential for their functioning as democratic institutions. Fair access to electronic networks (including hosting services) and ability to rely on the principle of the neutrality of the net should be ensured in the new media ecosystem.

The stress of the assessment of the experts is put on the regulatory framework. One of them states that “all dimensions of the media regulatory framework – media freedom, editorial independence; freedom from censorship; the rights to investigate; protection of journalists and journalistic sources; access to distribution channels, etc. are preconditions for a balanced media ecosystem”. And for another expert important are: cultivation, truth, value.
2. 2. Media pluralism and diversity of content

Three indicators are pointed out for the assessment of the applicability of these standards: management of scarce resources; transparency of ownership; public service media.

It is noteworthy that 33% of the journalists and 25% of the media experts left the question unanswered. This reaction is probably related to the strong feeling about media environment in Bulgaria that is not sufficiently regulated as an ownership and influence. The applicability of this standard was addressed positively by 56% of the journalists, followed by students (38%) and finally – by experts (33%). The latter (42%), together with the students (41%) agree to a large extent with the statement. The importance of the public service media is the most essential indicator for students in assessing the applicability of this standard (Graph 11).

Graph 11. Media pluralism and diversity of content

Although there are many operators, means and platforms for distribution of content in the new media ecosystem, the scarce resources (for example, radio frequency spectrum), according to the Recommendation, should continue to be regulated and monitored according to the public interest. In situations of strong media concentration pluralism cannot be automatically guaranteed by the existence of a large number of mass media communication entities available to people. A dominant position of any of them could be a potential risk to the democratic existence of the ecosystem.
Public service media are the core piece of the European model, which covers the co-existence of the public, commercial and community media. The balanced participation of people of different gender, as well as of representatives of different ethnic and religious groups in the production, editing and dissemination of the media content is a key factor in overcoming stereotypes with regard to all groups constituting the society.

Journalists in general are of great support to this standard. However, some of them are concerned about its applicability. One of them states: “It is achievable, but it again depends on the owners and the media managements, on the goals and the tasks, on the context in which they are placed to work”.

The experts also stress on the need of the transparency of media owners. In her assessment of the modern media ecosystem one of the experts notes: “The diversity of content is at the heart of the interest in the media and media formats. Knowing the owners of the media is as imperative as it is imperative to know the leaders of the parties and the leaders of the power institutions. Being the fourth estate, media are responsible for the implementation of this estate, regardless of its unofficial nature”.

2. 3. Media responsibilities

Critical monitoring of the public and political affairs and of private or business processes of public interest contributes to the free functioning of the media. In the new media ecosystem, the management, the aggregation and use of information and data must respect the right of people for private and family life, protected by Art.8 of the ECHR. It is also important to respect the intellectual property right.

Media responsibilities include abstinence from hostile speech or other content that incites to violence or discrimination. The Recommendation provides that they have to be vigilant regarding the use of expressions motivated by racism, xenophobia, anti-Semitism, hatred towards women, sexism (including towards people with different sexual orientation) or other biases. Their role is also important in presenting a balanced image of the different groups in society and to help the expansion of culture of tolerance and dialogue. In this respect, special attention should be paid to the protection of the dignity, security and privacy of children.
Freedom of expression should also apply to commercial and political advertising, the television market and sponsorship. The new situation may necessitate the simultaneous implementation of regulation, self-regulation and co-regulation.

The applicability of this standard is assessed by the following indicators: editorial responsibility; respect for dignity and privacy; respect for the presumption of innocence and fair trial; respect for the right of property; remedies for third parties; hate speech; rights of children; rights of women; rights of minorities; advertising.

53% of the media experts consider this standard as applicable along with all its indicators and another 25% consider it applicable to a great extent. The opinion of students and professionals is almost uniform, 44% and 43%, respectively. Observing the editorial responsibility and protecting children from inappropriate content are the two indicators identified by the students as important media obligations. Journalists again expressed their skepticism, with 37% of them not responding (Graph 12).

**Graph 11. Media pluralism and diversity of content**

Qualitatively, the responses of the journalists focus mainly on the respect for objectivity and pluralism, of refraining from hate/hostile speech, of respect for the dignity and rights of the individual. One of the journalists states: “this is not a matter of achievability“, but absolute obligations of the media in a normal society“.
The media experts assess positively in general the applicability of such indicators as: editorial responsibility; rights of children, and rights of women of minorities.

The indicators for the presumption of innocence and fair trial; respect for the right of property; remedies for third parties; rights of women; advertising are considered not significant by both journalists and media experts.

4. DISCUSSION
The significant changes in the media ecosystem, caused by the rapid developments in information and communication technologies and their application to mass communication, are determined by the new ways of disseminating content on a large scale. This often happens at considerably lower cost and with and fewer technical and professional requirements. According to the Recommendation these new features of contemporary media environment include unprecedented levels of opportunities for democratic citizenship due to the interaction and engagement by users. The trend is that they are not only prosumers, i.e. active participants and creators of content in online space. Thus, the boundaries between public and private communication are blurring. Therefore media’s intrinsic editorial practices have diversified, adopting new modalities, procedures and outcomes.

The role of the media in a democratic society, despite the transformations in the media ecosystem has not changed. However, specific policy moves are needed in order to assure its proper functioning in line with Council of Europe standards. That is why the Committee of Ministers recommended that member states should: adopt a new, broad notion of media; review regulatory needs in respect of all actors delivering services or products in the media ecosystem so as to guarantee people’s right to seek, receive and impart information; apply the six criteria when considering a graduated and differentiated response for actors falling within the new notion of media based on relevant Council of Europe media-related standards; engage in dialogue with all actors in the media ecosystem; adopt strategies to promote, develop or ensure suitable levels of public service delivery; remain attentive to addressing situations of strong concentration in the media ecosystem; and undertake action, individually or collectively, to promote these approaches in appropriate international fora (Council, 2011).
In the new media ecosystem it is important to identify media and media activities. Although the *Recommendation* outlines six criteria, each supplemented by a set of indicators, it also provides that not all criteria carry equal weight and that the absence of some of them such as purpose and underlying objectives of media (criterion 2), editorial control (criterion 3) or outreach and dissemination (criterion 5) would tend to disqualify a service from being regarded as media (Graph 13).

**Graph 13:** Comparison between Criteria: 2 (Purpose and underlying objectives of media), 3 (Editorial control) and 5 (Outreach and dissemination)

From the focused interviews with journalists and the expert assessment of media professors, media executives and media regulators, several important accents have been revealed concerning the functional characteristics of the modern media ecosystem in Bulgaria. The applicability of the three important criteria set out in the *Recommendation*, as well as the standards applied to the media in the new ecosystem, are of great interest to both the scientists and journalists, as well as to the students - all of them being consumers of media products.

It was found from aggregating the responses and comments of all respondents that the periodic renewal and update of content followed by the production, aggregation and dissemination of media content are the most important indicators for the applicability of criterion 2: Purpose and underlying objectives of media. For criterion 3: Editorial control, the leading indicators are the editorial process and the editorial team. Their importance is underlined by the responses of journalists in particular. Under Criterion 5: Outreach and dissemination, the actual dissemination is the leading one. While the experts' opinion on the
feasibility of all three criteria is relatively high, and for students relatively moderate, journalists see a peak in the editorial control criterion. This shows that journalists as a whole are aware of the importance of journalism's mission to inform audiences according to professional standards.

Leading indicators in the first standard: Rights, privileges and prerogatives, of the second part of the Recommendation: Standards applied to media in the new ecosystem, are: media freedom and editorial independence. Of the utmost importance in the applicability of the second standard: Media pluralism and diversity of content, is the indicator related to public service media. In fact, for the functioning of PSB in the best interest of society, the most rules are adopted and they are loaded with the most anticipated content by the users in their distribution. A significant part of journalists place emphasis namely on this indicator. The indicator of editorial responsibility in the Media Responsibilities standard collects the most support by the respondents. Two other approved indicators are: Respect for the dignity and privacy and Children's rights. Remedies for third parties and Hate speech are the indicators with the lowest support of the respondents. Failure to pay proper attention to the hate speech is a serious sign that the journalistic reflex to intolerance is blunted. As far as the applicability of the standards is concerned, experts are also most optimistic, especially regarding the indicator on public service media performances. For journalists, the second standard: Media pluralism and diversity of content, is particularly important (Graph 14).

**Graph 14** Standards applied to media in the new ecosystem
5. CONCLUSION

The rapid development of information and communication technologies has outstripped the regulatory framework, regulatory practices and theoretical rationalization of the media dissemination process. According to Toffler, this new ‘mosaic culture’ is characterized by demassification of the media and of society itself (Toffler, 1980). It is becoming increasingly difficult in the new ‘hyberspace’ to protect such democratic achievements as diversity of information sources and pluralism of opinions, disseminated information reliability, possibility of informed electoral choice and protection of minors from inappropriate content. The preservation of the sense of individuality of any one person in a crowd, as well as the development of freedom of choice options, are the most important missions of hypermodernity. A new, virtual online culture has been created that, due to its interactive nature, acts as universalizing and integrating while at the same time having an alienating and restrictive impact on people, destroying ‘live communication.

In the modern world, information division displaces ideological opposition. The diffusion of print and electronic media is observed as a result of the intensive development of information and communication technologies. As convergent phenomena, their development follows intensive social, economic and technological transformations. All these processes are subject to multilateral research. Whatever different views may exist, however, the trends show that challenges to the new environment, and in particular to audio-vision, are changing traditional concepts, practices and perceptions of media.

The Council of Europe, with its Recommendation on a New Notion of Media aims to help media policy makers to more effectively and professionally master the transformation processes in today’s media ecosystem. Thus, several trends for its developments in Bulgaria can be identified:

- technological: the territory of distribution of audiovisual content will continue to expand through various communication platforms in a variety of hybrid forms: media, media-like, personal, corporate, etc. More detailed analysis of the emerging technological
means and tools of communication will be needed;

- economic: the convergence of production and distribution of audiovisual content as well as the emergence of a new type of communicators will stimulate the development of new business models. This will imply a more thorough study of this tendency and foreseeing the impact on the content, and thence – impact of audiences;

- legal: increasingly intense updating of the basic and the elaboration of new documents related to the functioning of the globalizing information and communication medium is yet to be done;

- social: technological innovations will bring forth the need of a more serious protection of the fundamental rights and freedoms of citizens (access to information, freedom of expression, diversity of sources, pluralism of viewpoints, protection of minors, etc.), of professional and ethical journalistic standards (provision of informed choice in electoral campaigns, avoidance of hate speech and infringement of personal integrity, etc.);

- professional: the multi-functional requirements to journalists acting in the environment of convergent media will increase. Information and communication technologies applications will lead to the further development of the media ecosystem, i.e. to diffusion of blogs with the traditional journalism genres. New applications will facilitate the users to create audiovisual content as prosumers, and this will affect editorial organization and practice and will enhance the democratization of information exchange. Rationalization of the processes of content hybridization, as well as elaboration of mechanisms for verification and dissemination of information are needed;

- regulatory: public responsibility of producers and distributors of audiovisual media services will have to be ensured by increased efficiency of the combined efforts of regulation, self-regulation and co-regulation while respecting editorial independence and preservation of the public media model. The existing deficiency of self-regulatory mechanisms for the distributed online content will have to be overcome;

- educational: traditional curricula and methods in media specialties will evolve towards the continuing, unlimited by time and space learning. Emphasis should be placed on the development of media literacy and psychology curricula/programs.
Improvement of communication technologies can cause radical changes in society/social order. The meaning of the existence of the nation state is questioned. Indeed, in the new situation, the geopolitical borders are becoming more and more conditional and information superhighways surrounding the planet create prerequisites for global socialization.

New technologies undoubtedly fill up at a very low cost the qualification vacuum and stimulate continuous improvement. “Total technocracy” (Postman, 1992), “technetronic” (Brzezinski, 1982) internationalization of communication processes, however, implies maximum involvement of all the actors of the media ecosystem.

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CONFLICT OF INTERESTS

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https://www.google.com/search?q=Recommendation+CM%2FRec+(2007)+15+of+the+Committee+of+Ministers+to+member+states+on+measures+concerning+media+coverage+of+election+campaigns&rlz=1C1CHMB_bg


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ДЕБАТИРАНЕ НА НОВОТО ПОНЯТИЕ ЗА МЕДИТЕ
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РЕЗЮМЕ
От началото на този век развитието на ИКТ предизвика значителни трансформации в съвременната медийна екосистема. Конвергенцията на медите, обаче, изисква регулиране, за да бъде постигнат баланс между достъпа до онлайн услуги за съдържание, защитата на потребителите и конкурентоспособността. Като част от Стратегията за цифров единен пазар, през ноември 2018 г. ЕК преразгледа съществуващата Директива за аудиовизуалните медийни услуги като регулаторна рамка за медите през 21-ви век. Приетите нови правила създават по-справедлив регулаторен подход за целия аудиовизуален сектор, не само за доставчиците на традиционни услуги и услуги за видео по заявка, но и за платформите за споделяне на видео съдържание.

Целта на настоящия текст е да се определи степента на приложимост на критериите и стандартите, изложени в Препоръката на Съвета на Европа за ново понятие за медите (2011), в съвременната комуникационна среда в България. През 12.2018./02.2019 г. бяха проведени количествени и качествени изследвания сред студенти по журналистика, журналисти и медийни експерти. Основният изследователски въпрос беше да се установи до каква степен глобалните предизвикателства на ИКТ са повлияли на функционирането на медите в новата екосистема. А тя обхваща взаимодействието на всички участници и фактори, които позволяват на медите да функционират и да изпълняват ефективно ролята си в обществото. Резултатите от изследванията очертават основата за многопластова дискусия и анализ на медийните тенденции в страната.

Ключови думи: медийна екосистема, ИКТ, CM/Rec (2011) на Съвета на Европа

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