



ANALYSIS
of the Public Broadcasting in the Republic of Macedonia in the Context
of the European Media Policy

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Introduction

The Macedonian Institute for Media and the School of Journalism and Public Relations commenced a joint project with the Friedrich Ebert Stiftung Office Skopje, with the main objective to contribute to prompting a quality public debate regarding the situation of the media sector in the Republic of Macedonia.

This initiative was motivated by the fact that there is a lack of analytical and researching undertakings, intended for identifying the reasons why the media sector in the Republic of Macedonia and journalism encounter serious problems as well as to provide guidelines and recommendations to assist both the competent bodies that establish and implement the media policy and the media community.

The project consists of conducting four comprehensive analyses, focused on different current issues in the media sector in the Republic of Macedonia, which will be further distributed to all relevant entities and media.

This analysis is the initial one from the cycle of analyses foreseen for 2010, and is completely dedicated to the Public Broadcasting Service in the Republic of Macedonia. The analysis covers all the most significant issues related to the Public Broadcasting Service: the importance of public broadcasting in a democratic society; the program functions; the financing model; the model of management and supervision of its operations and the role of the Public Broadcasting Service in the new digital environment. Thus, an overview of the European standards and recommendations are presented for each of the issues, which is further followed by a review of the provisions in the national regulation and their implementation in practice.

Finally, the analysis contains a summary of conclusions and recommendations for further activities to be taken, so that the Macedonian Radio and Television can be transformed into a real Public Broadcasting Service, to serve the citizens and gain the trust and support from the citizens of the Republic of Macedonia.

The preparation of this analysis included experts from the Macedonian Institute for Media, professors from the School of Journalism and Public Relations as well as independent experts with theoretical knowledge and long-years of experience in broadcasting.

Skopje, June 2010

Summary

Key characteristic of the European Media Policy is the concept of public interest in the media sphere, and its realization in broadcasting is primarily related to the roles and tasks of the Public Broadcasting Service.

The document provides an overview of the European public broadcasting principles and standards and their application in the national regulation, i.e. the problems encountered by the public broadcasting enterprise, Macedonian Radio and Television regarding the realization of the functions as a Public Broadcasting Service.

The analysis is focused on the following issues:

- Does MRT fulfil its mission and program functions as a Public Broadcasting Service?
- Does the manner of financing imply independent and successful MRT operation as a Public Broadcasting Service?
- Does the model of management and supervision of MRT, as specified by law, correspond to the European standards and does it provide for its efficient and independent functioning?
- Which are the perspectives of MRT within the current digitalisation process of the terrestrial television?

The mission and the program functions of the Macedonian Radio and Television are clearly defined in the Law on Broadcasting Activity of 2005; however, it actually has not still realized its role as a Public Broadcasting Service. The Macedonian Radio and Television have been in a financial and production-technology crisis for many years, which cannot be overcome unless we identify the problems that prevent the realization of its role.

Program functions

The Macedonian Radio and Television fulfils the function of universality in terms of technical coverage, however, with regard to its contents, the programs do not reach the whole audience. The poor interest on the part of the audience for the MRT programs is due to the following: lack of quality, poor offer for different genres, lack of programs for certain segments of audience; political influence on the news and informative programs, and etc.

In addition, MRT does not manage to provide genre diversity in the television programs, mainly due to the fact that there is a lack of broadcasting space, once

the third channel was taken over for the parliament's channel. This problem needs immediate resolution within the digitalisation process, so that the second service will be returned to MTV, and provide for the possibility of introducing new thematic services within the framework of its mission.

With regard to the influences, MRT is still not independent from different forms of influence. News and current-informative programs for many years have been under influence of the ruling political structures, so that the trust of the public in their independence and impartiality has been almost completely lost. Nowadays, MRT is neither a "forum for public debate" nor it provides sufficient space for free expression of ideas, opinions or criticism.

The Macedonian Radio and Television programs do not meet the standards for distinctiveness and quality, and actually do not differ from the programs of the commercial broadcasters. Especially, there is a lack of innovative program from own production, new genre forms and production of new quality topics. For many years, MRT does not serve as „example“ for high professional standards, either from the aspect of production-technology, or from the aspect of contents.

Financing

Public Broadcasting Service funding from independent and public sources is the precondition for its institutional and editorial independence. Broadcasting subscription fee is the main way of financing the Public Broadcasting Services in the European countries, because funding from the Budget may jeopardize the editorial independence. Although it contains certain shortages, the model of financing of the Macedonian Radio and Television, as specified by the Law on Broadcasting Activity, corresponds to the model recommended in the European documents. The problem is that the new model did not function neither in the transitional period of six months (in 2006), nor later. This brought MRT into even worse financial situation and made it extremely dependent on the Budget. This also jeopardized its institutional autonomy and the editorial independence.

The documents of the European Broadcast Union underline that „...the amount of the licence fee should not correspond to what politicians regard as being more or less acceptable to their electorate...“, as well as „...The money actually needed to fulfil the public service mission, in all areas and in every respect, is therefore the starting-point for calculating the amount of the licence fee“.

Macedonian Radio and Television is still facing problems regarding the collection of the subscription fee: the register is not fully updated, many payers refuse to pay the bill retroactively, some of the payers completely refuse to pay the fee, there are legal problems regarding the enforced collection of fees, and etc. Another particular problem is that the amount of subscription fee was reduced to 130 MKD monthly under the legislative changes as from August 2008, which is a very low amount to meet the needs for regular functioning and development of MRT.

Model of management and supervision

The editors' independence is guaranteed under the Law on Broadcasting Activity, but this was not sufficient to provide for actual independence due to the inexistence of independent funding and insufficient independence of MRT management bodies. Although the model of MRT management and supervision, as defined in the Law, guarantees certain autonomy of its bodies, yet it contains serious shortages: MRT bodies are not adequately set up, and numerous decision-making levels and inadequate allocation of authorizations exist. In its expertise to the Law, conducted in May 2005, the Council of Europe also indicated to this shortage.

The reason for the unsuccessful transformation of the Macedonian Radio and Television in the period following the adoption of the new Law is also the selection of inadequate staff in the management bodies. People without any experience and knowledge in broadcasting were elected for the managerial positions in MRT, without the necessary trust and reputation by the public, nor dedication towards the realization of the public interest.

Although the Macedonian Radio and Television, in accordance with the Law, is accountable only to the legislative power (annual reports, financial plans, etc.), the practice of direct communication and informal „accountability“ of MRT management to the representatives of the executive branch of power, remained completely unchanged. This further undermined its institutional autonomy and editorial independence.

MRT in the digitalization process

The Council of Europe and the European Union underline that each state should guarantee that the Public Broadcasting Service shall be sustainable also in

the new digital environment. The programs of the Public Broadcasting Service should be present at all technological platforms in order to reach the whole audience, and the Public Broadcasting Service shall have the leading role in the digitalisation process.

Following the above stated guidelines, the Strategy for development of broadcasting activity in the Republic of Macedonia stipulates that the digitalisation process should be conducted in order to provide for and enrich the pluralism in the domestic contents, whereby the Public Broadcasting Service shall have the central role. To that end, the Strategy envisages that primarily in the first half of 2008 the legal framework should be adopted regarding the introduction of digital terrestrial television, so as to regulate the conditions and the procedure for allocation of digital frequencies. The first stage of digitalisation foresaw the allocation of three multiplexes at national level, out of which the first is intended for MRT existing and new TV channels, the second one for broadcast of the existing commercial TV services at national level, and the third one intended exclusively for broadcast of new TV services in DVB-H format.

However, the activities, which were realized as part of the digitalisation process of the terrestrial television, were not implemented in accordance with the European guidelines and the provisions of the Strategy for development of broadcasting activity. Although the Public Broadcasting Service is to be in the forefront in the digitalisation process, so far only the legislative changes have been realized of all the planned activities, whereby the public enterprise MRD was awarded one digital multiplex for broadcasting MRT programs. The process of constructing respective multiplex is delayed, and due to the poor financial situation, the lack of vision and technical and human resources, MPT is lagging behind the other broadcasters.

1. Importance of Public Broadcast in a Democratic Society

The Council of Europe and the European Commission have adopted numerous recommendations, guidelines and other documents, on which basis Member States, i.e. candidate countries, are obligated to develop a media system that guarantees freedom of expression, independence of media and media pluralism and diversity. All these documents are based on the basic principles of freedom of expression as specified in Article 10 of the European Convention on Human Rights, which are the grounds for democratic communication in a society.

European Media Policy is based on the concept of public interest in the sphere of media. In the theory of the media law and media policy, the concept of public interest is related to the „good governance“ and „effective citizen participation“. Effective citizen participation is participation of informed citizens, which implies free circulation of variety of different views in the media, and citizens' access to the media as a primary arena for political and cultural communication. Therefore, public interest as media concept is used in order to denote „...media capacity to enhance the social, economic and political development through improving governance and accountability to the public; building an informed and engaged citizenry; enhancing the inclusion of marginalized groups; and fostering the culture and identity of tolerance, diversity and creativity“ (Buckley et al., 2008: 9)¹.

The realization of public interest in the broadcasting is largely linked to the role and tasks of the Public Broadcasting Service, although the other two broadcasting sectors – commercial and non-profitable, play important role in the democratic media setting and contribute towards efficient citizenry and good governance. The Amsterdam protocol on the System of Public Broadcasting in the Member States of the European Union as from 1997, underlines that public broadcasting is directly linked to the fulfilment of the democratic, social and cultural needs of every society and serves as a factor of cohesion in the society. Its function as a factor of social cohesion implies that it contributes to the integration of all parts of society, that it serves the whole population and not only certain groups. It implies that it satisfies the needs of older and younger people, richer and poorer people, more educated and less educated people, and the groups with special interests (cultural, religious,

¹ Buckley, S., Duer, M. K., Mendel, T., & O'Siochru, S. (2008), *Broadcasting, Voice, and Accountability: A Public Interest Approach to Policy, Law, and Regulation*, Washington: University of Michigan Press.

scientific, social, economic, sporting, etc.) as well as the society as a whole. In other words, the Public Broadcasting Service is not to serve any government, parliament, president, or political parties, or any other centre of power. It MUST be independent from all centres of power and to serve only the interests of the citizens, but as citizens and not as consumers.

The role and the tasks of the Public Broadcasting Service are comprehensively defined in the Resolution Number 1 the Future of Public Service Broadcasting, adopted in 1994 at the Fourth Council of Europe Ministerial Conference on Mass-Media Policy in Prague², and later in Recommendation R (96) 10 of the Council of Europe on the guarantee for the independence of the public service broadcasting. Following these two key documents, the Council of Europe and the Parliamentary Assembly adopted a set of recommendations and resolutions³, which affirm and emphasize the values and principles embedded in the first two documents.

These documents have established the mission and the program characteristics of the Public Broadcasting Service, as well as the preconditions for its independent functioning and operations. Among the most important preconditions for realization of the functions of the public service are as follows: legal framework under which the public service operates, including the tasks and functions as specified by the legal provisions; management mechanism, including the procedure for election of members of the management bodies and executive directors; and financing framework.

2. MRT Program functions

The principles and recommendations for the Public Broadcasting Service as established in the European documents are summarized as four basic functions: universality, diversity, independence and quality. These four functions are mutually intertwined, so that they should be always perceived as a whole. All these program principles of the public service were fully implemented in Article 121 and several

² For more details see:

<https://wcd.coe.int/com.intranet.InstraServlet?command=com.intranet.CmdBlobGet&IntranetImage=411463&SecMode=1&DocId=517420&Usage=2>

³ For more details see: http://www.coe.int/t/dghl/standardsetting/media/Doc/default_en.asp

other legal provisions⁴ in the new Law on Broadcasting Activity (Official Gazette of RM, No.100/05) and, in this regard, the Macedonian regulation has been fully harmonized with the European documents.

Universality

The Public Broadcasting Service should make efforts towards having its programs „completely“ accessible to all citizens, who, regardless of their material and social status, will be able to follow the programs. Accessibility does not refer only to the technical coverage, but also to the aspects of the program contents: it means that everyone can understand and follow the programs of the Public Broadcasting Service.

Several provisions were included in the Law on Broadcasting Activity, in order to enable the realization of this MRT function. The respective provisions that enable technical access to the MRT programs specify the following: MRT broadcasts program services in the territory of the whole country (Article 117), there is guarantee for the broadcast of its services through the PE MRD network (Article 118) and stipulates the obligation for must carry of its services through all public communication networks (Article 110). In the sense of contents, universality is provided through the provisions of Articles 120 and Article 121(1), indents 2 and 3 of the Law, and refers to the MRT program obligations.

From technical aspect, MRT fulfils the function of universality, but for many years MRT has not managed to provide universality from the aspect of content, in particular if we take into consideration the indicators of the overall audience that its programs reach⁵. It seems that the poor interest on the part of the audience in the MRT programs is due to several reasons: lack of quality in its programs; poor genre offer; lack of programs for certain segments of the audience; political influence on the news and informative programs, and etc. Yet, in order to be able to support these evaluations with empirical data, a comprehensive qualitative and quantitative analysis of the program, as well as survey of the audience shall be indispensable⁶.

⁴ Article 120, 122, 123, 124, 125 and part of the provisions referred to in chapter VI of the Law on Broadcasting Activity that refer to the program standards.

⁵ The only publicly available data on the share in the ratings are the ones which have been published by the Broadcasting Council in the Analysis of the broadcasting market for 2008. According to the data, MTV1 share in the overall viewer's rating in 2008 was 7,63%, of MTV2 1,81%, and of the parliamentary channel 2,17%. MR1 share in the overall rating of the listeners in 2008 was 5,6%, and of MR2, 3,04%.

Available at: http://www.srd.org.mk/images/stories/publikacii/analiza_na_pazar_2008_-_Tocka%202.pdf

⁶ Besides this Analysis, it is recommended to look for the Analysis of MRT program, which was conducted by the Broadcasting Council Program Sector in 2010.

Diversity

Programs offered by the Public Broadcasting Service should be diverse in terms of the following: genre structure, target audience and topic and issues included. For instance, informative part the programs should not be limited to news and current-informative programs, but should cover other programs through which the citizens obtain information on different issues in their interest. The „programs of common interest“ may elaborate different topics: legislation in different areas; consumer protection; practical advices on different topics; topics from the field of agriculture, utility services, education, social protection, public transport, etc. It is through such programs that the Public Broadcasting Service gets closer to satisfying particular needs of the citizens.

This obligation of the Macedonian Radio and Television, is defined by the law in Article 120, whereby it is stated that „MRT is obligated to produce and broadcast programs of public interest which reflect the social and cultural pluralism in the country, and which consist of informative, cultural, educational, scientific, sporting and entertaining contents.“ Further more, according to Article 121(1), indent 2, MRT is obligated to „develop and plan the program schedule in the interest of the general public and to produce and broadcast programs for all segments of the society without discrimination, thus taking care of the specific social groups.“

The Macedonian Radio and Television is facing serious problems in the realization of the genre diversity of the television programs, primarily due to the fact that there is a lack of broadcasting space. In order to accomplish the function of diverse programs, all Public Broadcasting Services in Europe is in disposal of at least two TV channels. Thus, the first channel is mainly used for broadcasting news, current-informative and educational programs, whereas the second channel is used for broadcasting sporting events, entertaining programs, films and documentary programs. Macedonian Television used to have three networks, two of which were intended for broadcasting programs in Macedonian language, and the third one for programs of ethnic communities. Since 2005, by amending the former Law on Broadcasting Activity, the third network was taken away from MRT in order to establish the Parliamentary Channel; MRT has continuously faced problems regarding realization of its obligation for diversity of television programs. That was mostly notable in the periods when MRT as member of the European Broadcasting Union was given the rights to broadcast big sporting or other events. Due to the lack

of space, MTB1 regular programs are either postponed or the sporting events are broadcast on the frequency of the Parliamentary Channel, which was often the case in the past five years. Such solution is neither good for MRT as Public Broadcasting Service, or for the parliamentary channel, because it does not allow for the production of well-conceptualised program schedule, nor it can stabilize the audience habits for watching.

The problem regarding the lack of space calls for immediate resolution within the digitalisation process of the terrestrial television, so that MRT will restore the missing space, and this will also open the possibility for broadcasting new thematic services. In other European countries, within the digitalisation process the Public Broadcasting Service is given the possibility to introduce new thematic channels, which fit into their mission and program functions (educational, documentary, informative, except for the entertaining channels). However, one should take into consideration that besides technical conditions it is also indispensable to provide financial means for that purpose.

Independence

Public Broadcasting Service programs should be a „forum“ where different ideas and opinions are freely expressed, or point where information, opinions and criticism circulate. This is possible only if the Public Broadcasting Service is independent from any political or commercial pressures.

There are high expectations and demands from the Public Broadcasting Service regarding the *reporting* due to the fact that it is a public broadcaster, i.e. service which serves the citizens and is also financed by the citizens. Its informative programs should present as much as possible different (political) views, and not only the dominant ones in the society. In addition, informative programs should represent an analytical explanation and examination of all aspects of any event, which implies that professionalism and investigative journalism should be its strongest characteristics.

The Law on Broadcasting Activity clearly stipulates that MRT programs should be independent from any centre of power: „For the purpose of realization of public interest, MRT is obligated to provide that the programs which are produced and broadcast are protected from any influencing by the government, political organizations or centres of economic power“(Article 121(1) indent 1). Article 122 stipulates the following: „With regard to the production and broadcasting of

programs, MRT is obligated to respect professional principles and to provide equal access to different interests in the society, to make efforts towards freedom and pluralism in the expression of public opinion...“.

MRT news and current-informative programs for many years have been under the influence of the political structures in power, so that the trust of the audience in their independence and impartiality continuously declined, which also has impact on the ratings. It has been long since MRT is not recognized for the news and current-informative programs. Great number of experienced and professional journalists from MRT started working for private media, or work as freelance journalists in the framework of independent productions. Part of the professional staff that still work in MRT, cannot express their capabilities and knowledge, both due to the continuous lack of funding, and due to the chaotic manner of managing the enterprise and lack of vision on the part of the management structures suffering from continuous change in the past several years. Accordingly, one may say that nowadays MRT, still does not fulfil its obligation neither to be „forum for public debate“, nor it provides sufficient space for free expression of ideas, opinions and criticism.

Distinctiveness and quality

The Public Broadcasting Service programs should differ from the programs of the commercial broadcasters, thus the audience may clearly distinguish between the qualities. It should be innovative, introduce new genres and new titles, set professional standards, i.e. it should be benchmark for quality for the other media.

In order to realize its function of distinctiveness and quality it is important that the Public Broadcasting Service has its own production. It should not be only an „editor“ of the program schedule comprised of programs produced by others. Its own production would enable the PBS to fulfil its program functions and build its media identity. It is through its own production that it can make investigations, innovations, be creative and set the quality standards.

Quality and distinctiveness encompass the care for national identity and culture. The PBE should: promote linguistic culture; inform on artistic and cultural achievements; present pieces of art and cultural products and support creation of original pieces of art (theatrical performances, concerts, as well as entertaining music and entertaining-musical programs). It implies that PBE programs should contain as many as possible contents of „national“ character, rather than contents from other broadcasters. This obligation refers to all genre categories, and especially

to the feature television production, because in the past several years the audience was flooded with cheap serial and feature programs from foreign production.

The obligation for quality and distinctiveness of the MRT programs is explicitly defined in the Law on Broadcasting Activity, both at the level of general principle and at the level of specific program obligations. At the level of general principle, in Article 121, inter alia, it is stipulated that MRT is obligated for the following:

- *Taking care that throughout the programs it reflects different ideas, nourishes cultural identity of the communities, respects cultural and religious differences and stimulates the culture of public dialogue, in order to strengthen mutual understanding and tolerance, in the function of promoting relations among the communities in a multiethnic and multicultural environment;*
- *Nourishing and developing standards of speech and languages of all communities in the Republic of Macedonia;*
- *Nourishing, stimulating and developing all forms of domestic audio-visual creations which contributes to the development of Macedonian culture, as well as to contribute to the international affirmation of Macedonian cultural identity;*
- *Providing information on regional and local specifics and events in the Republic of Macedonia;*
- *Providing conditions for use and development of modern technical-technological standards for production and broadcasting the program and in a certain time period to design a plan for transition to digital technology in accordance with the established Strategy for development of broadcasting activity in the Republic of Macedonia, and*
- *Providing, keeping and archiving its own radio and television records and other materials and documents about MRT work, as a part of the audio-visual wealth of the Republic of Macedonia.*

The Law also stipulates the MRT concrete obligations regarding the following: broadcasting programs which were genuinely created in Macedonian language or in the languages of the non-minority communities in the Republic of Macedonia (Article 124), obligation to allocate 10% of the annual funds for ordering program which is produced by independent producers (Article 125), as well as obligation of each TV service to provide at least 60% European audio-visual creations of the total time on annual level (Article 123).

From the analysis of a series of data and documents of the Broadcasting Council⁷ and from the results published in analyses and research papers of different organizations⁸, one may conclude that the MRT programs to a low extent meet the standards of distinctiveness and quality, and that in this regard they do not differ much from the programs of the majority of private broadcasters. In the past years, there were several attempts for commercialisation and broadcasting of the programs that do not meet the quality standards of a Public Broadcasting Service at all⁹.

What MRT is especially deficient in is the innovative program of its own production. For many years, MRT is deficient in new genre forms, or production of new quality titles, nevertheless if it is a matter of: informative, documentary, educational, feature programs, or programs in the sphere of culture and art.

In the past several years, MRT no longer serves as an „example“ of high-quality professional standards, whether from the aspect of production-technology or the contents. Indeed, the underlying reasons are multiple: continuous financial crisis; loss of professional staff; lack of vision and incapability of some of the management staff; unfamiliarity with the Law and the program functions of the Public Broadcasting Service; political and commercial influence on its operations, etc.

3. MRT Financing Model

Macedonia is not the only country facing crisis problems of the Public Broadcasting Service. Following broadcasting liberalization and introduction of commercial media, the Public Broadcasting Services in many European countries, also faced financial and organizational problems that generated a profound

⁷The results of the analysis of realization of the program functions of MRT at public broadcasting sector were published in many annual reports of the Broadcasting Council from the past years, as well as in separate publications.

⁸ For more details see: Shopar, Vesna (2008), *Television across Europe – Follow-up Reports 2008, Macedonia*, Budapest: Open Society Institute. Available at: http://www.soros.org/initiatives/media/articles_publications/publications/television_20090313/macedonia_20080429.pdf

⁹ For example, MRT was the only example of public broadcasting service that started broadcasting „reality show“ of the type „Big Brother“, by broadcasting the so-called Balkan show „Toa sum jas“. In the course of 2009 and 2010, MTV started broadcasting American version of the reality show program „Moment of truth“. These types of programs were also broadcasted on the program in Albanian language at the MTV second channel.

production-technological crisis, decline in audience and erosion of their media identity.

Unlike commercial broadcasters, which are funded exclusively from advertising, the Public Broadcasting Service financing model must be well organized in order to provide its efficient financing from independent and public sources. Such funding is a precondition for institutional and editorial independence of the Public Broadcasting Service, both from the state and the political parties and the commercial interests. Accordingly, independent and public sources usually imply the funds collected from the subscription fee, or fee paid by citizens and legal entities in the country.

Recommendation R (96) 10 of the Council of Europe on the guarantee for the independence of the public service broadcasting, underlines that the Member States of the Council of Europe should introduce an adequate, safe and transparent framework for financing the Public Broadcasting Service, which shall provide for sufficient funds for realization of its mission, as well as that the Public Broadcasting Service must be consulted on the amount of the broadcasting subscription, thus considering the increase in the expenses for its activities. Further more, the system for collection of broadcasting subscription fee must be implemented in a manner that guarantees the continuity of its activities on long-termed basis. In the same direction, the Declaration of the Committee of ministers of the Council of Europe on the guarantee of the independence of public service broadcasting, of 27 September 2006, reaffirms the same principles underlined in the previous two documents, thus emphasizing that the Member States are obligated to provide all the indispensable legal, political, financial, technical and other means, in order to guarantee a real editorial independence and institutional autonomy of the public service broadcasting, so to eliminate any risk of political or economic influences. Furthermore, Recommendation Rec(2007)3 of the Committee of Ministers of the Council of Europe to Member States on the remit of public service media in the information society, also underlines that the Member States should provide safe and adequate financing of the public broadcasting service in order to enable the fulfilment of its role in the information society.

According to the document prepared by the Legal Department of the European Broadcasting Union (EBU) in November 2006¹⁰, broadcasting subscription is the main way of financing public broadcasting services in almost all countries in Western Europe (with the exception of Spain and the Netherlands). In most of the countries, besides the revenues from broadcasting subscription, public services also receive funding from other sources, mostly from advertising and sponsorships, but only as additional source of funding that should be invested into the realization of its functions for the program. Compared to funding from state budget, financing of a public broadcasting service from broadcasting subscription has several advantages:

- It is the main guarantee for editorial independence of a public broadcasting service, which, on the contrary, would have to „win over“ the political will of the those who decide on the budget funds;
- Funding is foreseeable in the long run, which is a significant precondition for planning and development of a public broadcasting service;
- Wherever broadcasting subscription exists, it is very important that the administration is done individually by the public broadcasting service;
- The broadcasting subscription is an important psychological link between a citizen payer and a public broadcasting service, which is expected to spend the collected funds exclusively in the interest of the citizens (instead of in the interest of the government or the parliamentary majority).

Further more, the EBU document underlines that „...the *amount* of the licence fee should not correspond to what politicians regard as being more or less acceptable to their electorate, and definitely not to what they regard as not doing harm to commercial broadcasters“. On the contrary, as has been emphasized in many resolutions and declarations of the Council of Europe and the European Commission, it must be ensured that the *overall* revenue of a public broadcasting service constitute „an appropriate and secure funding framework, which guarantees public service broadcasters *the means necessary to accomplish their mission.*“

¹⁰ Broadcast Receiving Licence Fee, European Broadcasting Union, Legal Department. Available at: http://www.ebu.ch/CMSimages/en/leg_p_broadcastreceiving%20licencefee_011106rev_tcm6-50157.pdf

Accordingly, the money actually needed to fulfil the public service mission is the starting point for calculating the amount of the licence fee.

The guidelines, which are stipulated in the European documents regarding financing of a public broadcasting service, were implemented in the new Law on Broadcasting Activity, which is in force as from December 2005. The basic source of MRT funding is broadcasting subscription fee, and additional sources of financing are also the revenue from advertising and sponsorships, programme sale, etc. All operations for register keeping and organization of the collection are conducted by MRT, and the amount of the broadcasting fee, prior to the adoption of the last amendments and supplements to the Law on Broadcasting Activity („Official Gazette of RM“, No. 158, as from 19 August 2008), was determined as percentage of the average net paid salary. This model provides for an independent source of financing for the Public Broadcasting Service, as precondition and guarantee for its editorial independence, and the fact that MRT individually administers the collection of broadcasting fee provides for foreseeing and planning of the revenues in the long run.

What is most important compared to the former Law on Broadcasting Activity is that the grounds for establishing the obligation for payment of broadcasting fee is no longer the possession of radio and or TV set. The broadcasting fee has the status of public charge, which is to be paid by everyone, regardless whether the programs of the Public Broadcasting Services are listened or watched. According to EBU, this model of financing is more appropriate for the importance of the Public Broadcasting Service for the whole society with regard to fulfilment of its democratic, social and cultural needs. The broadcasting fee enables production of programs, which are intended for and available to all citizens, including those that may not use it for a certain period of time. Therefore, the existing model of financing stipulates that the broadcasting fee is a public charge that must be paid by everyone: households, legal entities, hotels and motels, owners of catering facilities, and etc. (Article 145 and 146 of the Law).

Accordingly, the model of financing the Public Broadcasting Service as specified under the Law on Public Broadcasting Activity corresponds to the model recommended in the European documents and in the guidelines of the European Broadcasting Union. However, the problem is that this model did not start functioning following the entry into force of the new Law, which brought MRT in an extremely bad financial situation and made it dependent on the funds provided from the

Budget. The current MRT management staff, since October 2009, has been making efforts to increase the percentage of collection, but it seems that it is still facing many problems: the register is not completely updated; many citizens refuse to pay the bills on retroactive basis; some of the citizens refuse to pay the fee in general, the delivery of bills is not done accurately, etc.¹¹ In accordance with the amendments to the Law on Broadcasting Activity as from August 2008¹², the amount of the fee was reduced to 130 MKD on monthly basis. Although the amount seems sufficiently motivating to stimulate the interest of citizens to pay the broadcasting fee, yet it is very low to meet the needs for regular functioning of the Public Broadcasting Service, whereas the planning of development and digitalisation of MRT cannot be taken into consideration at all¹³.

¹¹ Published analyses or data about these problems and the percentage of collection of the broadcasting fee can be found neither from the Broadcasting Council, nor from MRT. The stated findings were obtained through interviews with the employees in MRT.

¹² Official Gazette of RM No.103 from 19.08.2008

¹³ In the debates on the occasion of reducing the amount of the broadcasting fee at the beginning of 2008, opinions were expressed that there is a lack of comprehensive analysis whether the amount is sufficient to provide complete financing of the Broadcasting Activity. See: „Utrinski vesnik“, 23 February 2008, „The lower broadcasting fee passed the first filter. “ Available at: <http://www.utrinski.com.mk/default.asp?ItemID=75F7EEFA5773B34DA5F1DDD7A5391D80>

4. Model of management and supervision of MRT

Recommendation R (96) 10 of the Council of Europe on the guarantee for the independence of the public service broadcasting, underlines that „the principles of editorial independence and institutional autonomy of the broadcasting organizations should be explicitly implemented in the legal framework that regulates their operations..“. The Law on Broadcasting Activity does not contain explicit provision whereby the institutional autonomy of MRT bodies is guaranteed, and the editorial independence is an issue which is underlined in Article 121(1) indent 1; however, this provision individually cannot provide for the factual independence, unless there is management autonomy and financial independence. Experiences of the past four years following the adoption of the new Law clearly support this conclusion. The system of independent funding failed to function during the initial years, which brought MRT into an extremely dependent position in terms of the Budget, and in addition, the full institutional autonomy was not completely provided.

The institutional autonomy of the Public Broadcasting Service refers to the right of the management bodies to freely organize and administer their activities in the framework of the authorisations specified by law and other internal rules (statutes, rulebooks, and etc.). In fact, institutional autonomy fails to imply that the Public Broadcasting Service management body work must not be controlled by the competent authorities from the aspect of lawfulness of their financial operations and rational management of public funds. Actually, the management model for the Public Broadcasting Service must equally be based on the principles of independence and accountability. On the one hand, this implies providing full independence from the state control, and on the other hand, adequate level of accountability. The balance of these two principles is organisational base for the Public Broadcasting Service and its relations with the government.

There are different models of management of public broadcasting services: in some countries those are corporate bodies (administrative councils, boards of directors, and similar), or individuals with management authorisations (president, general director, executive director, etc.), or both alternatives. The supervision of their work is usually assigned to bodies that represent the public, which are often

called Broadcasting Councils¹⁴. Such bodies may be bodies within the public broadcasting service or some external independent bodies.

The Law on Broadcasting Activity as from 2005 defines the bodies in MRT; however, their competencies or authorizations are not clearly distinguished in terms of division between the managerial and supervisory functions. Article 126 stipulates that MRT bodies are MRT Council, MRT Management Board and the Executive Director. It is not explicitly stated that MRT Council is the body obliged to supervise MRT program operations, although it can be indirectly concluded from Article 133(1) indents 1 and 2 where its competences are listed: „...it shall ensure the realization of public interest in MRT programs on the basis of the principles of editorial independence and autonomy; it shall establish MRT program policy and supervise implementation of the program guidelines... “.

Within the organization of the Public Broadcasting Service operation, clear distinction between the two levels of management should be made: establishment of general policy/long-termed decisions and daily current operations. Management boards or boards of directors (establishing business policy, budget approvals, appointment of executive directors, and etc) should be responsible for running the general policy. On the other hand, executive directors should be responsible for day-to-day management of the material and human resources, decision-making on program realization, and similar. In order to avoid the political influence on the everyday work of the Public Broadcasting Service, the executive director is responsible only to the board of directors, which reports on its activities, by rule to the legislative power. In this way, the board of directors is conceptualised as a kind of barrier between executive directors and authorities.

The analysis of competences or authorisations assigned to the three MRT bodies shows that there is no clear distinction between the levels of management. Some of the functions regarding the running of general policy have been assigned to MRT Council (which is supposed to do the supervision), and the other to the Management Board. On the other hand, it seems that the Executive Director does not have sufficient authorisations to run MRT current operations. To that end, all this creates confusion and inefficiency in the functioning of these bodies, which was actually proved in practice in the past four years. In this context, it is important to remind on the comment made by experts from the Council of Europe and the European Union

¹⁴ For more details see: „Model of the Law on Public Broadcasting Activity of the European Broadcasting Union“. Available at: <http://www.ebu.ch/en/legal/other/psb/index.php>

during the analysis of the draft text of the Law on Broadcasting Activity as from May 2005: „The management board has few authorisations and, it seems that the mediation phase between the Executive Director and the Council is unnecessary. The question is raised whether there is a need for such body and its establishment needs to be re-examined. The Executive Director, i.e. the person being most directly responsible for MRT functioning has least authorisations. It seems that he/she will be able to utter very little with regard to the program, although at the same time such person is usually editor in chief of the organization.“¹⁵ Thus, experiences from other European countries show that directors of the public broadcasting services are people who enjoy highest level of trust and reputation in public, who have extensive experience and knowledge in the sphere of broadcasting and dedication towards realization of public interest. As opposed to this, the transformation of MRT (in the period following the adoption of the new Law) is accompanied by inadequate staffing solutions in the management bodies.

In order to provide institutional autonomy and editorial independence, another important issue is accountability. The Public Broadcasting Service should be accountable to legislative, and not to executive branch of power, in regular (annual) intervals. This enables evaluation of the achieved results and spending of public funds in the respective period. Experiences in other countries show that in practice front people of the Public Broadcasting Service maintain contacts with representatives of the executive branch of power. Most often problems emerge when such frequent „informal“ contacts undermine the principle of institutional autonomy. The condition of accountability is fulfilled under the Law on Broadcasting Activity because MRT is accountable to the Parliament of the Republic of Macedonia. Completely different question is actual autonomy of the managerial staff from the bodies of executive branch of power. In the past four years, following the establishment of the new MRT bodies, the practice of direct communication and informal „accountability“ of MRT managerial staff to the representatives of executive power was not changed at all. The financial dependence of MRT from the Budget funds especially contributed to this situation.

The issue of supervision of the Public Broadcasting Service from the aspect of fulfilment of its functions is not less important. It can be assigned to bodies, which have been established within the Public Broadcasting Service, or to independent

¹⁵ Available at: http://ec.europa.eu/avpolicy/docs/ext/fyrom_en.pdf

expertise bodies. In some countries, regulatory bodies authorised to supervise overall broadcasting activity, are also authorised to supervise programs of the Public Broadcasting Service. In such cases, the Public Broadcasting Service is obligated to be accountable for its operations to those bodies. In this way, they serve as a kind of barrier from the political interference of the government in the Public Broadcasting Service work. The Law on Broadcasting Activity contains certain contradictions in this respect. On one side, MRT Council should conduct such supervision, and on the other side, it should be conducted by the Broadcasting Council. Such dualism in supervision creates confusion regarding implementation of the Law in terms of being unclear which are the authorisations of MRT Council and which are the authorisations of the Broadcasting Council for supervising the programs. Therefore, the analysis of Public Broadcasting Service functions regarding the program is a complex issue which implies serious technical and program capacities, and accordingly it is reasonable that this authorisation should be assigned to an independent regulatory body.

5. MRT role in the digitalisation process

The challenge posed in front of the Public Broadcasting Service in the digital future is to develop and adjust the principles of its existence to the new environment. Many public broadcasting services throughout Europe are already doing that, by introducing innovative specialized channels and Internet services. The Public Broadcasting Service should make use of the new technologies in order to advance and supplement its mission as a Public Broadcasting Service. The selection of new services, which are to be implemented by the Public Broadcasting Service, needs to be carefully performed, within areas that reasonably emerge from its mission (thematic news channels, documentary programs, educational channel, children's channel, and etc.).

Legal acts of the European Union as well as recommendations, resolutions and declarations of the Council of Europe clearly underline the role of the Public Broadcasting Service in the new digital environment and the need for all Member States to provide institutional and financial framework for digitalisation of the Public Broadcasting Service. This is directly linked to fulfilment of the functions of the Public Broadcasting Service in the digital time. Even the Public Broadcasting Service

programs of highest quality shall not fulfil its function of universality, if due to technical reasons they reach only part of the audience. It is known that nowadays, people – especially younger people, increasingly use informative, educational or entertaining contents from the new media, so that the audience gets more fragmented. Therefore, the Public Broadcasting Service needs to make its programs more available and on new platforms that transmit the contents, including services on demand or interactive program services. On the contrary, its role shall be limited to satisfying the needs only of the adult population.

On 28 May 2003, the Committee of Ministers of the Council of Europe adopted Recommendation Rec (2003)9 on measures to promote democratic and social contribution of digital broadcasting. This Recommendation underlines the great importance of existence of numerous independent and autonomous media for modern democratic society, especially media that have the role of public broadcasting services. Introduction of digital technology, especially in the segment of terrestrial television (DVB-T) offers great possibilities to retain and develop pluralism, but it also brings risks in terms of the possibility to jeopardize the public interest. Therefore, this Recommendation underlines that each state should create adequate legal, economic and technical conditions for development of digital broadcasting, which are intended to guarantee access of the audience to as much as possible selection of (domestic) quality programs. In addition, each state should guarantee that the Public Broadcasting Service shall be sustainable in the new digital environment and ensure that it has central role in the transfer towards digital terrestrial broadcasting. The concrete measures that would enable it, are as follows:

- The mission and functions for the Public Broadcasting Service program in the digital environment should be reaffirmed in the legislation, meaning that fulfilment of its function implies provision of new specialized channels for informing, education and culture, as well as new interactive services;
- In order to be able to realize its function of universality in digital environment as well, it is indispensable that legal, economic and technical conditions are provided so that the Public Broadcasting Service can have its programs present also on different digital platforms (cable, satellite, terrestrial, IPTV), with diverse and quality

programs. To that end, legal provisions should contain must carry rules through all platforms;

-Without stable and independent financial framework, in new technological context as well, the contribution of the Public Broadcasting Service towards fulfilment of the democratic and cultural needs shall be even more reduced.

The Strategy for development of broadcasting activity, which was adopted by the Broadcasting Council, is the only document in which the respective guidelines of the Council of Europe were implemented in the Republic of Macedonia. According to the respective guidelines central place in the scenario for digitalisation of terrestrial television, as stated in the Strategy, is given to the protection of media pluralism and to the Public Broadcasting Service. The Action plan on the implementation of the digitalisation foresees that legislation should be adopted initially in the first half of 2008, with precise definition of the conditions to use digital frequencies and definition of a detailed and transparent competition procedure for awarding digital multiplexes.

Digitalisation should be implemented in two stages. Awarding of three multiplexes on national level is foreseen for the first stage¹⁶, first of which being intended for the Public Broadcasting Service TV channels, the second for broadcasting of existing commercial TV services at national level, and the third intended exclusively for transmission of DVB-H TV services¹⁷. The digital multiplex intended for MRT TV services should, without any competition (under adequate legislative amendments) be awarded to the PE MRT. It is foreseen that in the second stage two more multiplexes will be awarded at national level (one for new domestic commercial TV programs, and the second for innovative TV services) and one multiplex intended for the regional TV services. The whole process is to be monitored and guided by the National-coordinative Body for Digitalisation, as an auxiliary body to the competent institutions that should implement the digitalisation.

In addition to these provisions, the part of the Strategy treating the protection of pluralism in broadcasting, also underlines that digitalisation opens great possibilities for MRT development regarding introduction of new thematic services intended to

¹⁶ See item 1.35, page 15 from the Strategy for development of broadcasting activity. Available at: http://www.srd.org.mk/images/stories/publikacii/strategija_za_razvoj_na_radiodifuznata_dejnost_2007_2012.pdf

¹⁷ In the technical standard MPEG4 established in the Strategy, one multiplex can be used for transmission of 8 -10 program services.

fulfil its mission of Public Broadcasting Service. To that end, MRT Council was obliged to adopt a program for long-term programming and technical-technological development as well as to make legislative amendments, so that MRT will be able to open new services¹⁸.

From the above stated provisions in the Strategy related to the digitalisation process and MRT role, so far only amendments to the Law on Establishment of the Public Enterprise Macedonian Broadcasting were adopted¹⁹, whereby this enterprise is awarded one digital multiplex intended for broadcasting MRT programs. The other activities, as part of the digitalisation process of terrestrial television in the Republic of Macedonia, are not being fully implemented and in accordance with the European guidelines and the provisions of the Strategy for development of broadcasting activity:

- The legislation on implementation of the digitalisation process, which will regulate all issues related to the conditions under which multiplexes can be awarded and used, has not been adopted;

- The legislative amendments, in order to reaffirm the role of the Public Broadcasting Service within the digitalisation process and to enable the introduction of new thematic services, have not been made;

- The awarding of digital multiplexes at national level was not conducted in accordance with the Action Plan for digitalisation of terrestrial television, thus considering the fact that national multiplexes were foreseen for broadcasting existing and new commercial TV channels at national level as well as for broadcasting new innovative services, which actually endangers media pluralism as primary goal of public interest in broadcasting;

- Independent and stable funding of the Macedonian Radio and Television has not been provided yet, which endangers its survival and its future in the new digital environment.

¹⁸ Item 4.13, page 57 from the Strategy for development of broadcasting activity.

¹⁹ Official Gazette of RM, No. 48 of 13.04.2009

6. Conclusions

Public broadcasting services in all former socialist countries were facing crisis not only due to systemic and structural reasons but also inadequate legislation. Legal provisions can ideally define the tasks and conditions of a public broadcasting service work; however they are not implemented in practice. The reasons for the crisis of the Public Broadcasting Service in the Republic of Macedonia are both systemic and internal: big number of commercial media and strong competition, fragmentation of the audience, inexistence of an efficient financing model, political influence, poor management, etc.

The Law on Broadcasting Activity as from 2005 comprehensively defines the tasks and functions of MRT as Public Broadcasting Service and guarantees the preconditions for its independent and efficient functioning. MRT financing model, as stipulated in the Law, corresponds to the guidelines of the European Media Policy, but was not implemented in practice for four years following its entry into force. The respective reasons were lack of knowledge and willingness on the part of MRT management staff as well as the climate created with the announcements for amendments to the Law and reducing the amount of broadcasting fee.

There are shortages in the provisions of the Law referring to the model of management and supervision of MRT, indicated by the experts from the Council of Europe and the European Union. There is no clear distinction between the authorisations of MRT bodies, which created confusion and inefficiency in MRT operation in the past years. Moreover, inadequate staff was elected for the key managerial positions, without sufficient experience in broadcasting and without trust and reputation in the public. Although the Law partially guarantees MRT institutional autonomy, yet the practice for MRT managerial staff to be accountable to the representatives of the Government instead of to the public has continued.

Due to these reasons, modern and efficient management principles of one big broadcasting corporation were not introduced, in line with the example of the successful European Public Broadcasting Services. For many years in the past no system exists for production planning of the program in MRT, program and production lines are not clearly defined, and there are no economic and technological parameters in the production of the program, which was not the case in the past.

Poor management, major financial losses and political influence contributed to further expansion of the crisis regarding MRT program identity and even bigger

erosion of its audience. Above all, this generated a crisis of perception of the public regarding the MRT role and need as a public broadcasting service, which was mostly reflected on their refusal to pay the broadcasting fee. Although the Council of MRT is a body supposed to represent the public, yet the audience is excluded from the influence on the programs, i.e. there is no possibility for the audience to express its positive opinion or dissatisfaction.

In the debate about the strongest arguments which justify the need for existence of the Public Broadcasting Service in the modern environment, its advocates most often express the following: pluralistic and diverse programs, objective and impartial reporting, and contents which are not offered by the commercial broadcasters. Nowadays, it is not sufficient to say that the Public Broadcasting Service function is to „inform, educate and entertain“, because commercial media do that as well. The difference is that the Public Broadcasting Service should fulfil these functions at higher quality level than commercial media.

In order to justify the need for its existence, MRT should respond to the above-stated arguments. This is due to the reasons that the topics, which are elaborated in MRT daily-informative program, do not express the pluralism of views and opinions that circulate in the society. Reporting is centralized, i.e. events and topics are usually covered to the biggest extent from Skopje, or only guest speakers from Skopje are invited for debates. MRT reflects neither the pluralism of ideas and opinions on regional and local level in its programs, because it has not developed regional production centres, nor it has sufficiently developed network of correspondents. It should contribute to the development of rural environments, which literally stated are at „informative periphery“.

Editorial policy of different editorial boards is not unified, which is very important from the aspect of MRT role as a factor of social cohesion. MRT is multilingual and multicultural Public Broadcasting Service, which additionally complicates its internal organization and functioning with respect to three basic components: editorial policy, and human and technical resources. In order to accomplish its role of cohesion in the society, MRT needs generally accepted and transparent standards of single editorial policy. MRT must not create divided audience, or effects of the so-called „mutual indifference“, i.e. the audience in Macedonian language is not concerned with the audience in other languages, and vice versa.

In order to be a relevant informative medium, MRT should develop network of correspondents. For example, MRT should have its correspondence centres in

Brussels, Washington and other important centres for international politics, since, in order to ensure relevant reporting on EU and NATO, it should come „from inside“, and should not be brought down to reporting on our desire to be part of the Euro-Atlantic integration processes; for instance, how much are the citizens informed that the principle of economic competition is functioning in EU?

The selection of domestic and foreign TV channels nowadays offered to the Macedonian audience is so big that there are almost no contents on the MTV channels that can attract attention of the audience. In the past years, it appeared that in the competition with commercial televisions, MTV started to abandon the characteristics of Public Broadcasting Service and entered into commercialisation of its programs²⁰. For a certain period of time, there was a prevailing opinion in MRT that there is no need for own production, i.e. there was an opinion that MRT should produce its programs in co-production with independent producers. Therefore, steps were taken to suspend some editorial boards, which produced own quality programs for many years in the past, and on the other hand, there was an influx of ideas for private co-production projects of suspicious value. The production of educational, scientific, documentary, children's and feature programs was reduced at the account of such projects.

Since 1990, although it became Public Broadcasting Service of independent Republic of Macedonia, MRT, is still marginalized at regional and European level, and it is neither capable to stimulate nor to accept initiatives for regional cooperation, or co-production with European service broadcasting that used to cooperate with in the past (RAI, BBC). Cooperation with foreign informative radio-services is an example of faulty editorial policy, because the Macedonian Radio is the basic source/producer of its own programs in Macedonian language. Thus, in many cases there is essential difference in the Macedonian Radio reporting and foreign service broadcasting about same events that happened in the country. The broadcasting fee, which is paid by the citizens, cannot be used for re-broadcasting of foreign news and informative programs, but primarily it should be used for creation of domestic programs.

²⁰ Most characteristic example for this is broadcasting of the so-called „reality show“ programs („Toa sum jas“, „Moment of truth“), or a range of talk-music shows with low production value.

7. Recommendations

- Future legislation should encompass changes with regard to explicit guarantee for institutional autonomy and editorial independence of MRT as well as precise definition of authorizations of its bodies. The minimal principles of MRT internal organization should also be included in the Law, so as to clearly define the production-technology and editorial structure. In order to be a modern media corporation in the new competitive environment, MRT must clearly define organizational structure regarding all three segments: program, technical equipment and production.

- Good Public Broadcasting Service in Macedonia cannot exist without sufficient funding. Competent state institutions should provide all necessary mechanisms and measures for smooth functioning of MRT, especially with regard to the collection of broadcasting fee. The current amount of the broadcasting fee, under the assumption that it is collected from all the payers, will not provide sufficient funds to fulfil MRT functions regarding the programs. The European Broadcasting Union Recommendation needs to be implemented and it is necessary to re-examine the possibility for quarterly reconciliation of the fee amount, on the basis of the real MRT needs. If that is not feasible, a way should be identified to offset the lack of funds, but from stable and independent sources (independent budget) and through implementation of transparent procedure. These sources should also provide funds for the beneficiaries of social welfare who are not able to pay the fee, as well as for the digitalisation of MRT. MRT bodies should provide complete transparency in their work, especially in the part that refers to financial operations. The broadcasting fee should be used for MRT current operations, whereas the funds for its developmental needs and digitalisation should be provided from additional funds from RM Budget. Thus, care needs to be taken for the respect of MRT institutional autonomy and editorial independence.

- Nowadays, MRT is functioning in a competitive – both national and regional – media environment, thus its program and corporation functions should be adjusted to the new environment. In order to be economically efficient, it is indispensable that MRT restores the introduction of program-

production planning and to introduce all principles of economic organization of the production-technology process.

- MRT bodies should insist that the legally guaranteed editorial independence is also realized in reality: MRT programs to be free from any form of political or economic influence. Political interests and influence must be excluded from MRT bodies. Persons with experience, knowledge and reputation in public should be elected in MRT bodies.

- It is indispensable to redesign MRT services program concept, in order to provide presence of diverse programs intended for all parts of the audience and to fulfil its legal functions as Public Broadcasting Service. MRT cannot completely satisfy its functions as Public Broadcasting Service until the second program service is returned to MRT. This calls for immediate resolution by digitalisation of its programs.

- The parliamentary channel should further remain under MRT editorial responsibility; however it should be exclusively intended for broadcasting contents related to the Parliament activities. It is not recommended that separate legal entity should be established by the Parliament, due to the possibility for political influence on its contents, and because it is irrational to spend money and resources for establishment of a new enterprise when the Public Enterprise Macedonian Radio and Television already exists. The Council can further take care of the parliamentary channel and participate in the conceptualising the program for this channel, along with the editorial team of the Macedonian Radio and Television.

- Prior to the design of parliamentary channel new program concept, it would be indispensable to make a comparative analysis of the organizational set-up and the editorial profile of the parliamentary channels in other European countries. The analysis should offer conclusions, recommendations and proposals about the future organizational set-up of the parliamentary channel in the framework of the domestic broadcasting regulation and its program objectives.

- With regard to annual planning of the programs, MRT should first consider the needs of different social groups and provide versatile programs. Thus, the main objective should be offer of quality programs, which are produced according to the highest editorial and production standards.

- The biggest part of MRT program should be comprised of own production. It should develop production of programs that are missing in Macedonia and programs that are not offered by commercial media, in particular: feature and serial films, dramas, children's program, educational program, etc.

- MRT should introduce a system of regular communication with the public and citizens. In line with the example of some European public broadcasting services, it is recommended to introduce an „ombudsman“, or some other body that takes care of responding to complaints and reactions from the audience.

- It is indispensable that wide debate is initiated with the general public regarding the importance of the Public Broadcasting Service, which shall include all relevant organizations and entities. Accordingly, the Broadcasting Council should have an important role, main legal competence of which is to take care of realization of the public interest in broadcasting.