

POLICY BRIEF:
FUTURE OF PSB IN MACEDONIA

**PARTICIPATORY MODEL
FOR PUBLIC MEDIA IN MACEDONIA:
REVIVING AN IDEA**

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SUMMARY

One of the main reasons for the failed transformation of the public broadcaster in Macedonia is the political parallelism of the entire media system: the strong and durable links between the political parties and the media. The omnipresent political pressure, also applied on the public broadcaster has turned from modest, subtle and concealed (as was the case in the 1990s) to brutal, direct and unidirectional (as is the case since 2008). The non-transparent, insufficient and irregular financing of the PSB; the strengthened direct clientelistic ties between editors, journalists and political actors; the open threats and intimidations amounting to censorship and self-censorship, have partaken in the overall “politicization” of the PSB’s titular mission - to broadcast in the name of the public interest. Despite this diagnostics, this policy brief claims that PSB in Macedonia has a transformative and a transforming potential by reinvent itself along its four core values: citizenship, universality, quality and trust. We claim that a feasible direction for its development would be a ‘Participatory Public Service Model’ (PPSM) – a model which should be based on a solid and stable connection between PSB and civil society.

INTRODUCTION

Macedonia's political landscape is marked by deep divisions between political actors, a high level of contestation of the legitimacy of the political institutions and a widespread culture of clientelism. This has a direct impact on the media system as a whole and on the public service broadcasting in particular. As the country increasingly moved toward authoritarianism¹, we need to assess the question: where does PSB in Macedonia stand at present and what should be its future. In a nutshell, we claim that the only feasible route for the PSB in Macedonia to follow is towards creating a solid and stable connection with the audiences and even more importantly with "the publics" – a route that would lead to a 'Participatory Public Service Model'. We make a conceptual distinction between the notions of "audiences" and "publics", although they are frequently used interchangeably in literature and in popular discourse... We take audiences to be a "number of unidentifiable people united by their participation in media use"² and we take publics to be self-imagined³ groups whose members inter-act towards creating manifestations of collective action⁴. We might think of audiences as individuals or categories of individuals who *receive* media content, and think of publics as self-aware groups who not only receive but also actively *engage* in participation in public discourse. Those publics who act through the media and social networks in order to advance their agenda on certain issues with respect to their collectively constructed values, are here referred to as Media Active Lay Publics - MALPs⁵. We define the PPSM in terms of four components that empower the public by making channels and protocols of active participation of the civil society in the creation and implementation of public policies: normative, programming, organizational and technological component. It includes an obligation of the PSM editorial staff to critically monitor and assess the implementation of public policies and to actively encourage and incorporate the opinion of diverse publics in formulating its editorial policy.

1 Freedom House, Nations in Transit: Macedonia 2015. Accessed on November 20, 2016: <https://freedomhouse.org/report/nations-transit/2015/macedonia> and Freedom House, Freedom in the World 2016. Accessed on November 20, 2016: https://freedomhouse.org/sites/default/files/FH_FITW_Report_2016.pdf

2 Hartley, J. (2002). Communication, cultural and media studies: The key concepts. London: Routledge 2012.

3 Anderson, B. (1983). Imagined communities: Reflections on the origin and rise of nationalism. London: Verso 1983.

4 Gamson, W. A. (1992). Talking politics. Cambridge university press.

5 Micevski, I. (2014). Distinctions: Audiences, Lay Publics & Media Active Lay Publics. INFOCORE Working Paper, Work Package No. 3 „Media and Publics“. Online available at: http://www.infocore.eu/wp-content/uploads/2016/03/INFOCORE-conceptual-paper_media_active_lay_publics_I.M.pdf.

In this policy brief, we discuss the current challenges of the PSB in Macedonia and explore perspectives for overcoming the obstacles for its transformation by revisiting the four normative principles of the PSB: *citizenship, universality, quality⁶ and trust⁷*. Being central to the idea of PSB, these concepts are revisited in the ongoing debates on PSB in the novice technological setting.⁸ PSB, by definition, has a crucial role in enabling citizens' active participation in the process of social change and in flourishing of a critical and vibrant public sphere⁹. The access to the public sphere should be open in principle to all citizens¹⁰ and it is in the PSB core remit to enable inclusiveness as a crucial democratic principle.

Since in 1991 Macedonia gained its independence from Socialist Federal Republic of Yugoslavia it had undergone three major normative transformations¹¹: Firstly, the 1997 Broadcasting Law and the 1998 Law on the Founding of the Public Enterprise – Macedonian Radio Television, normatively transformed it from a “state broadcaster” to a “public broadcaster”. Secondly, in 2005 the Law on Broadcasting activity completed the legislative process and explicitly defined MRT as a public service, with clear provisions concerning its programming functions, editorial independence and institutional autonomy of its governing bodies: the MRT Council, the Managerial Board and the Executive Director; finally while the 2013 Law on Audio and Audiovisual Media Services normatively guarantees the independence of the broadcaster it decreases the presence of the civil society sector in the MRT Program Council.

Nevertheless, content analysis of the MRTV news broadcasts¹² and research of the routines in the newsrooms¹³, demonstrate that while normatively its functions have been demarcated in the direction of the respect for the public interest, practically it has never in fact been transformed into a public service broadcaster, it failed to produce high-quality programs that reflect the public interest and did not restore public trust. The main disadvantage of all previous attempts for normative transformation of MRT was that they neglected the importance of its relationship with citizens and civil society and left a lot of room for direct political influence. Therefore, our main claim is that the Macedonian PSB has a future only if it moves towards a ‘participatory model’ – one that would use existing technologies and would create new organizational structures that would enable PSBs to enact protocols for inclusion of publics “from below”. This model would enable the PSB to establish an enduring relationship with publics and the civil society as a basic condition for regaining trust and legitimacy in the society.

6 Georgina Born and Tony Prosser, “Culture and consumerism: Citizenship, public service broadcasting and the BBC’s fair trading obligations.” *The Modern Law Review* 64, no. 5 (2001), p.657.

7 Benedetta Brevini. *Public Service Broadcasting Online: A Comparative European Policy Study of PSB 2.0*. Palgrave Macmillan, 2013, p.31.

8 Gregory Lowe and J. L. H. Bardoe. „From public service broadcasting to public service media.“ (2007) and Karol Jakubowicz, „PSB 3.0: Reinventing European PSB.“ In *Reinventing Public Service Communication*, pp. 9-22. Palgrave Macmillan UK, 2010, p.9.

9 Phil Ramsey, „Public service broadcasting and the public sphere: normative arguments from Habermasian theory.“ *Networking Knowledge: Journal of the MeCCSA Postgraduate Network* 3, no. 2 (2010), p. 3

10 Jürgen Habermas, ‘The Public Sphere’ In: Goodin, R. & Pettit, P. (eds.) *Contemporary Political Philosophy*, Oxford: Blackwell, 1997, 105.

11 As it became a member state of the Council of Europe (CoE) in 1995, Macedonia undertook obligations to incorporate in its legislation the basic tenets of the European media policy, including the concept of PSB

12 Trpevska, Snezana and Igor Micevski. “How does the media construct their political bias”, Skopje: School of Journalism and Public Relations, 2013. Accessed on November 25, 2016: http://unescochair-vs.edu.mk/images/attachment/LOCAL-ELECTIONS-2013_ENG.pdf

13 Igor Micevski, Snezana Trpevska and Zaneta Trajkoska. “Media and the non-majority communities in Macedonia: poor resources, low professional standards and ethno-political clientelism.” In *Information in Minority Languages in the Western Balkans: Freedom, Access, Marginalization*, edited by Davor Marko, p.p. 99-122. Sarajevo: Media Plan Institute, 2013.

1.

POLICIES AND TRENDS AT EUROPEAN LEVEL: THE PUBLIC SERVICE MEDIA PARADIGM

To be able to understand what is happening with PSB in Macedonia, we need first to present briefly the wider context of EU-driven policies that influence local policy making as well. Recent debates on the future of Public Service Broadcasting have been marked by contradicting views. On one side, the proponents of the neo-liberal approach argue that PSB has no future and that any regulatory intervention on the free media market represents an unnecessary state paternalism.¹⁴ On the other side, the supporters of the PSB in the new digitized environment, argue for reforms in the direction of the establishment of ‘public service media’.¹⁵ Behind this stance, lies the need of essential transformation of the PSB in order to adapt to technological developments and maintain its basic functions in the new media ecology. Proponents of this approach criticize the neo-liberals by using three main arguments: *First*, the ‘free press model’ makes liberal values dependent on privately owned media; *Second*, neo-liberal views tend to magnify the interests of elites through corporate ownership and control; *Third*, pluralism of voices and interests tend to be marginalised within the prevailing market-driven systems.¹⁶ The PSB mission in such a context would be “...to guarantee provision of electronic media services free from the effect of the profit motive – offering the individual both a ‘basic supply’... and provision of content adjusted to special needs and interests.”¹⁷ However, the supporters of this idea argue that PSB cannot continue fulfilling its basic mission without substantial modernisation and adaptation to the new technological and social context.

14 Sarajevo: Media Plan Institute, 2013.

15 Tony Sampson and Jairo Lugo, “The Discourse of Convergence: A Neo-liberal Trojan Horse” in *Broadcasting & Convergence: New Articulations of the Public Service Remit*, Eds. Gregory Ferrell Love and Taisto Hujanen (Göteborg: Nordicom Göteborg University, 2003), p.84.

16 Bardoel, J. L. H., and Gregory Ferrell Lowe. „From public service broadcasting to public service media: The core challenge.” (2007), p.9.

17 Jonathan Hardy, *Critical Political Economy of the Media: An Introduction*. London: Routledge, 2014.

Jakubowicz, *Public Service Broadcasting: A New Beginning, or the Beginning of the End* (Knowledge Politics, 2007), p. 9

In the last decade, the European Union has developed a new policy reflected in the Audiovisual Media Services Directive (previously Television without Frontiers Directive) which to certain extent was a reflection of the commercial and corporatist pressures to free the media and communication markets from regulatory burdens. The advent of technological convergence was the strongest argument used to call upon a new integrated communication policy. As a consequence of these pressures, the concept of the 'public interest' has been modified to encompass economic and consumerist values, although policy makers often referred to universal service principles while discussing the rise of Internet and new technologies.¹⁸ The universal service rules ensure that every user can access basic communications services at a reasonable quality and an affordable price, even if the market would not provide it.¹⁹ However, despite this shift towards liberalisation in the audiovisual sector, the European Commission has never entirely abandoned the idea of preserving PSB in the new digitized environment²⁰. The remit and programming obligations of PSB at both EU and national levels are defined on the ground of universalistic values which resonate with the values of Western European democracies. These values are best illustrated in the frequently quoted expressions that: PSB it is for everyone and should be freely available to everyone, that the PSB should provide **universal** access to high-quality programs for all citizens, particularly to poor and rural viewers, or that its programs should promote democratic values and be sensitive to the needs and interests of all citizens.

The same universalistic values are embedded in the concept of 'public service media' (PSM) introduced by scholars²¹ and later supported by the European association of public broadcasters – European Broadcasting Union (EBU). In addition to the traditional radio or television, PSM also includes "...digital platforms that meet the changing needs of how audiences consume media today."²² In consistence with the core remit and values defined for PSB, the EBU has adopted a new Declaration aimed specifically at reaffirming its commitment to accept the challenges of digital revolution and to develop new ways to serve the public "...anytime and anywhere, on new, emerging and existing platforms."²³ The retention and further development of these normative values in the new digital environment will enable the public service media to reach the fragmented individuals, to encourage and mobilize them to participate in the democratic dialogue by expressing their views and opinions on the PSM multi-media platforms.

18 Van Cuilenburg, Jan and Denis McQuail, „Media policy paradigm shifts towards a new communications policy paradigm,“ *European journal of communication* 18, no. 2 (2003), p. 200.

19 See more details on the European Commission web site: <https://ec.europa.eu/digital-single-market/en/universal-service>

20 Reference to the Amsterdam protocol and beyond

21 Bardoel, J. L. H., and Gregory Ferrell Lowe. „From public service broadcasting to public service media: The core challenge.“ (2007), p.9.

22 For more information please see EBU – European Broadcasting Union, <http://www3.ebu.ch/about/public-service-media> (Accessed on September 17, 2015).

23 European Broadcasting Union, *Empowering Society: A Declaration on the Core Values of the Public Service Media*, (Geneva: EBU,

2.

THE CONDITIONS AND PERSPECTIVES OF THE PSB IN MACEDONIA

The first step in considering the conditions and prospects for introduction of PPSM in Macedonia should be an analysis of the domestic legislation and practice in terms of the aforementioned four normative principles. Some of these principles are to some extent incorporated in the current Law on Audio and Audiovisual Media Services, but it is necessary to discuss their further normative operationalization in the context of transforming the mission of the PSB in the new technological environment, strengthening the relationship with citizens and raising the level of trust among the public.

The principle of ‘*universality*’ is fundamental for the public service and it should be addressed having regard to dimensions: universality of access and universality of content. Universality of access refers to both technical, social and content aspects²⁴. It means that PSB services should be technically available to all members of society regardless of their geographic or socio-economic circumstances and should be able to cater for the different interests and tastes of society. As such, universality is defined in the current Law only as a general obligation: MRT is obliged to develop and broadcast programs available to the overall public, to plan the program scheme in the interest of all societal segments without any discrimination, taking into account the special groups in the society.²⁵ Available analyses of the regulatory authority and audience research data indicate that MRT services are technically accessible to the audience in the country, but most of the content broadcasted to those services are not viewed at all by the biggest part of the intended audience.²⁶ A clear indicator for that is the overall audience share of the two main TV services offered by MRT in 2016 was 4.1%, the first service having 3.6% and the second 0.5% of the audience share.²⁷ In the context of new technologies and internet, universality of access is no longer reduced to provision of terrestrial program services available to all segments of the population, but also as program offer present on all relevant online platforms. Regarding the use of new technologies to reach larger audiences, it can certainly be said that MRT has not developed so far any strategy for developing a portfolio of new services, both generalist and specialized or tailored for specific audiences.

24 Council of Europe, 2007 Recommendation of the Committee of Ministers to Member States on the Remit of Public Service Media in the Information Society, 31st of January.

25 “Zakon za audio i audiovizuelni medijski uslugi,” [Law on audio and audiovisual media services] Official Gazette of Republic of Macedonia 184/13, 13/14, 44/14, 101/14 and 132/14, Article 110, paragraph 1 and 2.

26 „Izveštaj od analizata na televiziskite programski servisi na javniot radiodifuzen servis MRT (3-9 October 2011)”, [Report from the analysis of the television program services of the public service broadcasting MRT (3-9 October 2011)]. http://www.avmu.mk/images/Analiza_na_TV_programski_servisi_na_JRS_MRT_2.pdf

27 Source: Nielsen Audience Measurements, Macedonia

The second dimension of universality is the requirement for program diversity, (universality of content) which is defined in the Law with regard to all its dimensions: the genres of programs offered, the audiences targeted, and the subjects discussed. For example, MRT is obliged to create and broadcast "...high-quality programs on all political, economic, social, health related, cultural, entertaining, educational, scientific, religious, environmental, sporting and other events."²⁸ However, MRT fails to offer program diversity in its existing program services, neglecting the interests of some important segments of the audience. For instance, informative programs should not be limited to news and current affairs, but should encompass also other specialized programs that critically analyze different topics: legislation in different areas; consumer protection; education, health, social protection, topics from the field of agriculture, environmental protection, public transport, etc. In the analogue environment, Macedonian Television faced serious problems to fulfil its obligation for diversity, primarily due to the fact that there was a lack of frequencies for terrestrial broadcasting. The same conclusion was made by the regulator in its assessment of MRT's 'diversity' obligation: "...the public service needs one more frequency to fulfil its educational function... because one of the crucial shortcomings of its programming is the lack of a serious approach towards children."²⁹ The problem regarding the lack of frequencies could have been solved with the digitalisation process because the new digital transmitters allow distribution of more program services by using one frequency. However, there is still neither vision nor concrete plans made by MRT managing bodies in that direction.

There are many views and definitions on what represents the principle of '*quality*', because this is a concept which varies according to social, cultural and ethical values of different societal systems. However, in the context of the PSB in Macedonia we will emphasize the stance which argues that quality for PSB 2.0 is to be conceived as a relation between its programs and a set of values which promote citizenship and democracy. In that sense, the first aspect of the principle of '*quality*' is the independence of news and current affairs programs which is formally introduced in the Law to ensure that MRT is a forum where ideas, opinions, and criticism can be expressed freely and that MRT programs are independent and protected from any kind of influence from the Government, political organizations or other centres of economic and political power. But in practice, the main news programs of the PSB, both on the First and on the Second TV channel, do not fulfil the basic requirements for balanced reporting reflecting different political views. A content analysis conducted in 2013 revealed how political bias in MTV newsrooms was constructed during election time.³⁰ MTV 1 allocated most of the time in its primetime news for the ruling party VMRO – DPMNE's coalition campaign, airing an "e normous number of news items in which the ministers promote the results of the Government's work and announce investments, infrastructural buildings, investments in industrial zones and a series of other projects."³¹ On the other side, the main news in Albanian language on MTV 2 put the main emphasis on the campaign of DUI, the ruling party of the ethnic Albanians, by directly promoting their achieved results and by using many positive value assessments.³² The newest studies provide evidence on the tremendous political-

28 "Zakon za audio i audiovizuelni medijumski usluzi," [Law on audio and audiovisual media services] Official Gazette of Republic of Macedonia 184/13, 13/14, 44/14, 101/14 and 132/14, Article 110, paragraphs 3 and 4.

29 „Izvestaj o analizi stanja televizivskih programskih servisa javnog radiodifuzijskog servisa MRT (3-9 Oktobra 2011)“, [Report from the analysis of the television program services of the public service broadcasting MRT (3-9 October 2011)], p.19.

30 Snezana Trpevska and Igor Micevski, "How does the media construct their political bias", (Skopje: School of Journalism and Public Relations, 2013).

31 Ibid, p.5.

32 Ibid, p.12.

party grip over the PSB editorial policy³³. A comprehensive qualitative content analysis of the political pluralism in the news programs indicated even synchronization in the daily reporting of the public television and three pro-governmental TV stations – Sitel, Alfa and Kanal 5. In both, the selection of topics, sources cited and the framing of the stories were in favour of the ruling VMRO-DPMNE³⁴. In addition, the analysis showed that the two public TV channels (MTV1 and MTV2) strongly favour VMRO-DPMNE and DUI respectfully.³⁵

There are also other aspects of the principle of quality, but here we will also highlight one that is very important for the Macedonian society which is “divided” along ethnic, religious and ideological lines. The public service has a specific role in this society - to foster social cohesion, to promote tolerance and understanding, respect for differences, the sense of peace, suppression of discrimination and the benefits of the civic society etc.³⁶ However, the consociational aspects of the Macedonian political system are clearly reflected in the development of the media system, which is described as “...a typical segmented plural system in which social cleavages are mapped onto media cleavages”.³⁷ This is also reflected in the organizational structure and program output of the Macedonian Radio and Television, which is divided among the two biggest ethnic communities in the country, while the other or “smaller” ethnic groups receive only minor shares in its division. The newsrooms in Macedonian and in the languages of non-majority communities (especially the newsroom in the Albanian language) function as separate, parallel worlds which primarily focus on their own ethnic community and frame and observe the events predominantly from the point of view of their own community.

There is no doubt that the quality of programming, especially the issues of impartiality and distance from centers of political power, is directly connected with the principle of ‘*trust*’. So far, trust has not been considered as a normative principle (neither at European nor at national level), but rather as one of the consequences of the achieved quality. We believe that this normative principle has to be taken into consideration in any discussion about the perspectives of the PSB in the Western Balkans because it will lead towards the creation of closer connections between the

33 Institute for Communication Studies: REPORT from the Monitoring of the Media Content (23rd of November – 18th of December 2015).

34 Ibid, p.4.

35 Ibid, p.6.

36 “Zakon za audio i audiovizuelni medijski uslugi,” [Law on audio and audiovisual media services] Official Gazette of Republic of Macedonia 184/13, 13/14, 44/14, 101/14 and 132/14, Article 110, paragraphs 6 to 10.

37 Sandra Bašić Hrvatinić, Mark Thompson and Tarik Jusić, *Divided They Fall: Public Service Broadcasting in Multiethnic Societies*, (Sarajevo: Medija Centar 2008), p.30.

public broadcasters and citizens, but also a tool of resistance to political and other pressures. For that purpose, it is of crucial importance to oblige the PSB, on the one hand to adopt internal program standards and on the other, to take into consideration the citizens assessment on the overall program quality and more specifically on the trustworthiness of the PSB news programs. In the current Law there is only one provision that is indirectly related to the principle of trust: the MRT Program Council is obliged to monitor the comments and suggestions of the audience regarding the broadcast program and to ask from the MRT Director "...to adjust the scope, structure and overall quality of the program content."³⁸ However, it has to be emphasized that to determine citizens' trust in news and other programs it is not sufficient to monitor comments and suggestions of the audience but to oblige the PBS to regularly commission and use reliable data produced by independent research organizations. There is no evidence that MRT Council has so far systematically taken into consideration audience perceptions about the program quality.

The principle of '*citizenship*' is defined as comprising of four dimensions of rights: civil, political, social and communication rights³⁹. This definition is based on a conception of democracy which implies that "citizens are given the opportunity to fully participate in politics and therefore are able to renegotiate the common good..."⁴⁰ Communication rights are of crucial importance for the accomplishment of other rights and for citizens' participation in the overall democratic processes. Therefore, we claim that the requirement for promotion of citizens' communicative rights should be incorporated as a key normative obligation of the participatory public service media. All the previous normative models of the PSBs in the Western Balkans did not take into consideration this requirement and this was probably one of the reasons why the attempts to transform state media into genuine public service broadcasters failed. In the current Law on Audio and Audiovisual Media Services, there is only a general requirement for the PSB to "develop and broadcast programs focused on encouraging media literacy"⁴¹ without elaborating what actually media literacy is. Nothing else is mentioned in the legislation in terms of encouraging citizens to create content or to use new online platforms and social networks to promote citizens' participation in the public sphere.

38 Zakon za audio i audiovizuelni medijski uslugi," [Law on audio and audiovisual media services], Article 124.

39 Benedetta Brevini. Public Service Broadcasting Online: A Comparative European Policy Study of PSB 2.0, p.42.

40 Ibid, p.42.

41 Zakon za audio i audiovizuelni medijski uslugi," [Law on audio and audiovisual media services], Article 110.

3.

FUTURE STEPS FOR CONSTRUCTING THE PARTICIPATORY MODEL

The key question we answer here is whether the PSB in Macedonia has any chance for overcoming the obstacles for its transformation given the political and institutional predicaments of the state? How to find a perspective for the future of PSB in Macedonia so it can regain its commitment to *citizenship, universality, quality and trust*? We claim that the only feasible perspective to follow is the one towards strengthening a solid and longstanding connection with the citizenry and civil society, which might lead to a 'Participatory Public Service Model'. This is not a new concept either at theoretical or at policy level⁴², but we claim that this is the only direction to save the public interest idea in the specific societal and political circumstances. PSB, by definition, is envisaged as a space which enables the flourishing of a critical and vibrant public sphere and, therefore, it has a crucial role in enabling citizens' active participation in the process of social change.

Thus we propose a participatory model which is based on the possibility of citizens' stronger participation at various levels – strengthening their partaking not only in supervisory bodies but also in the program assessment and production. The precise modalities of this participatory shift in the organization of the PSB are yet to be formulated with respect to the normative ideas of the functioning of its bodies. However, in this occasion as a starting point we make general suggestions calling upon a reform in three basic areas: *First*, we propose changes in the modes of election, the composition and the functioning of the MRT's Programme Council; *Secondly* we propose changes in programing and in the nomination procedure and obligations of the editorial staff in the PSB, *Thirdly*, we propose changes in the MRT's financing, as a precondition for PSB transformation and *Fourthly*, development of media literacy skills among media publics.

The *first* set of changes entail that the majority of the members of the MRT's Council are to be recruited from the relevant segments of the CSO sector, in order to strengthen its influence on MRT programming principles and standards and on safeguarding the public interest. This set of changes would include obligations for the members of the MRT's Council to organise regular public hearings within constituencies to discuss about the most recent assessments and opinions of the citizens and civil society organisations about MRT's programming and its editorial independence. In addition, MRT's management should be obliged to commission regular analyses and studies about citizens' perceptions and program appreciations which would be submitted to the Council for debate. Interactivity of this sort is an enormous possibility of the digital age- and therefore this is rather a new opportunity than a disadvantage for the PSB.

42 Council of Europe, Strategies of public service media as regards promoting a wider democratic participation of individuals, Strasbourg: 2009. Accessed on November 15, 2016: [https://www.coe.int/t/dghl/standardsetting/media/doc/H-Inf\(2009\)6_en.pdf](https://www.coe.int/t/dghl/standardsetting/media/doc/H-Inf(2009)6_en.pdf)

Second, the participatory shift in MRT's program departments, especially in the newsrooms, implies their obligation to establish and maintain regular connections with its audiences (rather 'Publics') in order to foster their active participation in programming. Again, the digital age is an enabling environment for this sort of interaction with audiences. We propose changes in the legislation in order to oblige the PSB to promote the democratic participation of the citizens in its programming, as part of its remit. Also, the PSB should be legally obliged to develop and adopt specific internal rules on how to encourage interaction with the citizens and how to incorporate citizens' diverse opinions and content in a range of informative, educational, cultural and other programs. Next, the PSB should be obliged to establish a separate department in its internal structure which will regularly contact, collect and analyse citizens' opinions, proposals and complaints with regard to its programming.

The *third* set of changes need to entail transparency in the financing of the PSB so as to enable the break of the clientelistic ties and the party colonisation of the MRT. This would require a serious analysis which would precede a legislative change, mainly to address and regulate the state aid. The current proposals for securing stable and independent funding for MRT are focused on finding an appropriate mixed model, i.e. both from the broadcasting tax and from a legally determined percentage of the state budget that will be automatically transferred to MRT. This proposal seems to be a good long-term solution for MRT's institutional autonomy, but additional rules should be incorporated in the Law on audio and Audiovisual Media Services in order to foster its financial transparency and accountability. Although the current legal provisions incorporate some rules on financial transparency, it is necessary to elaborate more details provisions in order to make MRT's diverse funding sources more transparent.

Finally, the *fourth* area of intervention should be focused on developing general media literacy skills of the publics, especially their communicative and participative skills. This dimension of the media literacy concept is of special relevance for the participatory PSM model, because without such competences the publics cannot use media creatively to express and communicate ideas, information and opinions and will not be able to exercise their democratic rights and civil responsibilities. Communicative and participative dimension implies development of various individual competences: (1) *social relations*, or making and maintaining contacts through media and social media and following trends relayed by the media and peer groups; (2) *participation in the public sphere*, or maintaining participation with group that shares common values, using social media to manage strategically contacts with other groups, adopting appropriate presentations of identity and interacting with multiple institutions appropriately; (3) *content creation*, or sharing commonly created devices, fostering active collaborative work and cooperation, solving problems through active cooperation and collaboration and conceptualizing, creating and producing new media texts⁴³. The development of these competencies would encourage democratic participation, thus transforming the segments of audiences into *Media Active Publics*⁴⁴.

43 DTI - Danish Technological Institute and EAVI - European Association for Viewers' Interests (2011), Final Report "Testing and Refining Criteria to Assess Media Literacy Levels in Europe, page 24. Brussels: European Commission. Available at: <http://ec.europa.eu/culture/media/media-content/media-literacy/studies/final-report-mlstudy-2011.pdf>

44 Micevski, I. (2014). Distinctions: Audiences, Lay Publics & Media Active Lay Publics. INFOCORE Working Paper, Work Package No. 3 „Media and Publics“. Online available at: http://www.infocore.eu/wp-content/uploads/2016/03/INFOCORE-conceptual-paper_media_active_lay_publics_I.M.pdf

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