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Sally Broughton Micova

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Content Quotas: What and whom are they protecting?

Sally Broughton Micova

INTRODUCTION

When private television started to take off in Europe in the 1980s it confronted an environment in which the role of television and radio in cultural and national identity formation had already been established through national public service broadcasters (Gripsrud, 2007; Price, 1995). Having relied largely on publicly funded television and the film industry to produce such content, European countries lagged far behind the US in terms of their capacity to generate content for television (Esser, 2009; Tunstall and Machin, 1999). The large private television networks and production houses in the US were well situated to sell their content, particularly fiction and entertainment, to the new private channels in Europe.

Most European countries placed requirements on their private television stations, and usually also radio, for certain amounts of domestically produced content. Their individual markets and production industries remained small compared to that of the US, which fuelled part of the reasoning behind the EU's Television Without Frontiers Directive (TWF Directive) and the Council of Europe's Convention on Transfrontier Television that followed. The TWF Directive, since amended and renamed the Audiovisual Media Services Directive (AVMS Directive), aimed to break down national barriers to broadcasting and encourage a common, larger market for television. At the same time it included quotas for *European works* and independent production to be achieved by stations gradually and "where practicable" (art. 16). This non-binding formulation was based on what many countries already had in a more obligatory form at the national level.

Although there is no doubt that such quotas, both national and European, are forms of protectionism, it is less clear what exactly they are protecting. Arguments made in support of quotas often refer to protecting national culture or European cultural

diversity (Iosifidis, et al., 2005). However many claim that they are actually aimed at the economic protection of the production and distribution industries (Harrison and Woods, 2007; Hitchens, 2006; Katsirea, 2003), placing an undue financial burden on television stations and encouraging the spread of lower quality, less culturally valuable content (Anderson et al., 1997; Besio, 2008; Iosifidis et al., 2005), particularly one-off international entertainment formats (De Bens, 2001). Produced in country and in the local language, one-off entertainment formats are some of the *quota quickies* that broadcasters use to meet requirements. With the ever expanding number of channels available and audiences making increasing use of non-linear platforms for accessing audiovisual content, two main questions are important for private television stations struggling to compete. First, what cultural values or industrial interests are content quotas protecting, if any? Second, at what financial cost to the television stations do quotas come?

In order to answer these questions it is important to look at the exact conditions of the quotas, and I argue, the specific national contexts in which they are implemented. This means looking both at the policies in place and to the extent possible at the practice of their implementation. This chapter begins by looking at the European and national, cultural and industrial interests behind quota policies and finds that some of these are not necessarily complementary.

There is little data on the type and quality of programs that broadcasters are using to fulfil quota obligations or the financial impact of quotas on television stations. The second section of this chapter presents some of the evidence available and introduces new data from one national case. Based on the arguments mentioned above on the implications of quotas on the financial health of broadcasters and the quality of programming, I chose to look at programs in what could be considered a potential "worst case scenario": Macedonia, a small state with an economically weak media system. Small states media systems are characterized by small audiences and advertising markets, limited production capacity, and vulnerability to foreign content and capital (Puppis, 2009; Trappel, 1991, 2010). Combined, the evidence indicates that quotas do not appear to be very effective in encouraging pan-European content, but neither can they be convincingly blamed for encouraging lowest common denominator content, nor burdening stations financially.

In the end, regardless of academic debate on whether quotas are good or bad, decisions about whether or not to have quotas or if they should be raised or lowered are taken at the political level. It can easily seem unpatriotic for a government or parliamentarian to argue for reducing national quotas. At the European level the case for quotas, mainly championed by France and opposed by the UK and Germany so far, is framed in other broader struggles between protectionist and neo-liberal approaches (Humphreys, 2005). As European and national policy makers consider the future of quotas for linear television and their potential use in non-linear audiovisual services, I suggest it is important to remember that there are also political interests at stake.

QUOTAS IN POLICY

In Europe, television, even private television, is not treated solely as a business. Debate about television policy assumes that the production and consumption of audiovisual content has an impact on national culture and therefore defending it is linked to the defence of expression of collective identity (Schlesinger, 1997: 372). This assumption, which underlies the logic of protectionist measures such as quotas at the national level, was transferred to the debate around quotas at the European level when the TWF Directive was being negotiated. However, as the EU did not have direct competence in cultural policy the European level quotas were shaped more by industrial or commercial concerns (Harrison and Woods, 2007: 243). Several different formulations of content quotas can be found in national level policy across Europe, but the same tension between cultural concerns and industrial interests are commonly reflected. This section explores the different justifications and types of content quotas, drawing out not only the tension between the goals related to cultural identity and industry, but also that between the European and the national interest.

Above I posed the question of whether quotas are a cultural policy or a form of economic or industrial protectionism. The short answer is that they are usually intended to be both, however they imply two distinctly different policy aims and the extent to which they can be complementary depends partly on the way they are formulated. In other words, the devil is in the details.

Culture or Industry: Justifications for Content Quotas

Quotas for audiovisual works pre-date television. France introduced quotas for French works in cinemas back in 1946 as part of bilateral trade negotiations with the US (Cocq and Messerlin, 2003). It is has been well established that quotas on audiovisual works have been responses to fears about the dominance of the American audiovisual production industry, however this response has been based both on the impact it might have on industry and on audiences (Bekkali, 2006; Dolmans, 1995; Tunstall and Machin, 1999). The perceived threat has been not just to jobs in the production industry, but also to Americanization as a form of cultural dominance.

This was perhaps first and most acutely felt by the US's closest neighbour with a shared language, Canada. In its Broadcasting Act of 1968 Canada defined its broadcasting system as primarily for Canadian expression and for the "maintenance and enhancement of national identity and cultural sovereignty" (Canadian Radiotelevision and Telecommunications Council, 2008; Department of Justice Canada, 2011), leading to the imposition of high quotas for Canadian content on television and radio in the 1970s. The French have been the EU's champion of quotas as a method of protection against American cultural imperialism arguing for them as necessary to protect their way of life in arenas such as the GATT negotiations They have successfully kept their own audiovisual works outside of the scope of free trade rules (Gant, 1995; Schlesinger, 1997), although there remains no general cultural exception for audiovisual works. Domestic content quotas are usually described in policy documents as aimed at promoting national culture and quality (Iosifidis et al., 2005). The kind of language used in Canada decades ago, seems to have reappeared in many of the newer democracies of Eastern and Central Europe and the successor states of Yugoslavia where quotas are common. In Macedonia for instance, the regulatory authority, in its instructions to broadcasters, refers to those provisions as "the articles for the preservation and protection of the national culture and identity" (Broadcasting Council of Republic of Macedonia, 2007: 114-116), although in law they are simply listed among the other programme standards.

Despite the casings of cultural identity at the national level and the fact that it was

primarily France's cultural arguments that led to the establishment of the European quotas (Schlesinger, 1997), many have argued that content quotas are fundamentally forms of economic protectionism for audiovisual production and distribution industries (Harrison and Woods, 2007; Hitchens, 2006; Motto et al., 1997). The preamble to the AVMS Directive states that European independent production quotas "will stimulate new sources of television production, especially the creation of small and medium-sized enterprises; whereas it will offer new opportunities and outlets to the marketing of creative talents of employment of cultural professions and employees in the cultural field" (Council of European Communities, 2007). Protection of the creative industries or audiovisual production sector is explicitly behind some national level quota policies. Canadian content quotas are derived from Article 3 of the Broadcasting Act which refers to "displaying Canadian talent" (Department of Justice Canada, 2011), and the definition of Canadian content is tied to the employment of Canadian production and creative workers (Media Awareness Network, 2010). Other countries directly link their quotas to investment in domestic production or, as in Canada, to programs defined by the engagement of producers, authors or others from the country.

Looking at the language of the European directives, the European Convention on Transfrontier Television, and the arguments made in favour of including content quotas in European policy, it seems that European quotas are intended to protect both European culture and audiovisual production industries. One can assume most national policymakers also would ideally like to achieve both goals. However, the aim of protecting national or European culture implies that the content meets some criteria related to cultural or public interest contribution and quality (Harrison and Woods, 2007), whereas the aim of protecting jobs in the industry emphasises the quantity of production. Both quantity and quality are not always achievable, particularly in small countries with limited production capacity. This means that these two different reasons for implementing quotas, while not necessarily mutually exclusive, might not be complementary either. Most European countries, both EU and Council of Europe members, also have national level quotas, so in order to assess the extent to which cultural and industrial goals are balanced or complementary it is important to look at the details of how the various content quotas are structured.

One Europe, Many Nations: Different Kinds of Content Quotas

The structure of content quotas consists of three conditions: the definition of what qualifies as quota fulfilling content, how the quota is to be measured, and the amount. Definitions may be vague or specific, but it seems that the potential for quotas to be fit for purposes related to culture depends mostly on the latter two conditions.

The Council of Europe defines *European works* simply as "creative works, the production or co-production of which is controlled by European natural or legal persons" (Council of Europe, 1989 art. 2). The definition in the EU's AVMS Directive is more detailed, but still is based upon the place of origin of the production (See Council of European Communities, 2007 art. 1). Those television stations bound by the AVMS Directive are also subject to either allot at least 10% of their transmission time or at least 10% of their programming budget, for European works created by producers who are independent of broadcasters (Council of European Communities, 2007 art. 17). This means that both definitions of European works and the independent production provisions define quota-qualifying content in relation to the characteristics of its production and not of the programme produced.

Definitions of the works subject to national level quotas differ, but can generally be classed into three categories:

- 1. audiovisual works produced domestically, such as in Albania, Ukraine, or the UK, which refers to them as 'original works';
- audiovisual works produced in the national language(s), which is the practice in France and most of the newer EU members or candidate countries such as Croatia, and Macedonia;
- 3. "own productions" or audiovisual works produced in-house, which is often described as made by the television station itself or commissioned by it for its use. Estonia, for example, has a required percentage of in-house production, while Slovenia combines such a provision with a language-based quota.

As in European policy, the types of quotas for in-country or in-house production base the definition of quota compliant content on where programs are produced. As Katsirea (2003) points out a quota policy based on the location of the producers, authors and workers, may meet industrial policy objectives, but does not guarantee the content contributes to culture. While language based policies may appear to have more cultural aims, at least in increasing the use of the national language(s), I suggest that there is essentially little difference. Although there is crossover and co-production potential in the French and German speaking countries, there is little chance that many productions in Slovenian, Macedonian, Hungarian or even Polish are likely to be produced outside the country. This means that the definition of what fulfills the quota requirement is still closely tied to location, therefore what type of content counts, in terms of genre or other characteristics, is largely determined by the way they are measured.

European works quotas, and in most countries the independent production quotas as well, are measured as a percentage of total transmission time, excluding news, sports events, games, advertising, and teleshopping, meaning production in these genres cannot count towards fulfilling the quota. Many countries exclude the same genres of programs in the calculation of total transmission time as the EU provisions. This is especially true for countries in which the laws that contain the quotas were drafted after the TWF Directive or European Convention on Transfrontier Television. The narrow spectrum of genres qualifying for European and most national quotas favors drama, documentary, and entertainment. However, Harrison and Woods (2001; 2007) have argued that the exclusion of news and sports, often produced by stations themselves, indicates that the real aim of such quotas is to protect jobs in the independent production and creative industries, and not to protect the public interest in terms of television content. There is no space here to explore debates about high and low culture, but one could challenge the assumption that a documentary or art film contributes more to cultural cohesion or national identity formation than the evening news or live broadcasts of the national sports team.

Quality is not a condition in any of the quota policies, and dramatic series, films, documentary, and high quality entertainment are expensive to produce or purchase from independent producers. This means that the unit of measure and overall amount of quota will be an important factor in determining the quality of programs with which television stations can fulfil the quotas. European quotas are measured yearly,

whereas national quotas are often measured as percentages of daily, monthly, quarterly or yearly transmission time depending on the country. Yearly quotas allow stations flexibility to meet the quota through seasonal series or periodic programs, which is not the case when quotas must be met on a daily basis.

Television stations are to ensure that more than 50% of their transmission time is made up of *European works*. At the national, level quotas range from 5 to 55%. However, how many unique programs make up those percentages depends on the number of repeats allowed to count towards the quota and how each state determines the total from which the percentage is taken. In all countries obligated by European quotas, their own domestic content also counts towards fulfilling the European quotas. Often the quotas for domestic content make up a large portion of the European 50%. Any European aims would be overshadowed by national interests in Bulgaria where stations must broadcast 50% Bulgarian works or in Croatia where 55% must be in the Croatian language.

Cross Purposes

The fact that European quotas are based on quantity rather than quality, and on the origin of the production and not the characteristics of the product, means that the protection they offer is more to the industry of production, rather than the audiences watching the programme. Which industry they are protecting can be seen in the detail of the policy, which excludes certain genres of programming in the way that transmission time is calculated for measuring European works or independent production quotas. By excluding the daily news or sports coverage among others, the European quotas appear to favour the independent production houses and others in the creative industries rather than the television stations.

This has led some to claim that European level quotas protect the giant production companies of the large European states, such as France, Germany and the UK at the expense of smaller countries (Harrison and Woods, 2001) whose production capacity is limited. However, the European quotas most often run parallel to national level quotas aimed at protecting domestic interests. European quotas are to be implemented "where practicable," which makes them essentially non-binding, whereas domestic

content quotas are almost universally binding obligations for which there are often

penalties for non-compliance. Though they may be more binding, national quotas on

paper also seem to be aimed at protecting industry. However, the next section will

argue that the consequences of quotas can be very different depending on how they

are implemented in the market.

QUOTAS IN PRACTICE

Both European and domestic content quotas are applied to broadcasters, meaning that

it is the television stations that have to implement them. Broadcasters, however, are

both producers and consumers of the content in question. They produce European or

national works themselves, but they also procure the same from independent

producers and from each other. This gives them a significant amount of control over

the supply of content, including its quality. Despite the cultural and public interest

value attributed to them by policy makers and academics, private television stations

are businesses, trying to thrive in an increasingly competitive market.

In the previous section I argued that the industrial policy goals of quotas outweigh the

cultural policy goals because of the way they have been structured. The literature

mentioned above raises questions about both financial and cultural implications of

quotas, so this section will still consider implementation in terms of both industrial

and cultural aims. The first question then to be asked is whether content quotas are

effective in meeting these policy goals. The second is what side-effects of the

implementation of quotas there might be and how they relate to these goals. The

particular position of television stations as both producers and purchasers of content is

a key factor in both of these questions. This section looks at how television stations

use this position to manage the relative benefit or burden of the quotas on their work.

I find that European quotas seem to do little to protect European industry or culture,

but in some cases may contribute to increases in national content. The evidence

presented below also suggests that quota fulfilling content may relate to national

culture even if quality is an issue, and also that the role of politics in each national

context should not be ignored.

Effectiveness: Do Content Quotas Work?

As described earlier, European quotas were established as part of efforts against US domination in audiovisual production and the increasing presence of American content on European television. Europe's largest production industries in Germany, the UK, France, Italy and Spain grew during the 1990s, but have been shrinking since (Esser, 2007). The average percentage of European works shown in EU countries has actually declined since 2000 from a high of 66.95% in 2001 to 63.21% in 2008 (European Commission, 2008, 2010). Though this is still well above the required 50%, Esser (Esser, 2007; 2009) found that overwhelmingly most of what makes up the figures for European works is actually domestic content and that the amount of non-domestic European content has been decreasing.

European quotas, therefore, seem to do little to encourage the trade in European works among European countries or the audiovisual production industries in general. Part of the explanation for the failure of European quotas can be found in the reasons given by countries for non-compliance and the reactions of smaller states. Countries reported that European programs are difficult to find at competitive prices and that a few large players dominated the rights markets (European Commission, 2010: 7). They also reported that the quotas are particularly a challenge in small markets where there is low capacity to produce or commission European works (ibid.). This means that it is not financially feasible for television stations in many small countries to acquire much programming from the large European production companies. However, neither do many of these countries, particularly in Eastern and South East Europe, have an abundance of domestic production companies from which to acquire programs in the genres that qualify. In a 2003 survey of representatives from national regulatory authorities (NRAs) from then EU candidate countries or states in the accession process, several respondents re-iterated this problem and called for news and local sports broadcasts to be included in the EU quotas (Shein, 2004; Shein and Rajaleid, 2003). A lack of capacity in the independent production sector also presents a challenge for meeting national quotas. However, the NRA representatives reported that both EU and national quotas have contributed to increases in the amount of national content (Shein and Rajaleid, 2003). Despite a lack of capacity in the production industry in these countries, television stations are still meeting quota requirements with high amounts of domestic content. But how?

Meeting both EU and national quotas appears to be a challenge for television stations in small countries, which are the majority in Europe. However in the cases of Macedonia and Slovenia I found stations doing two things to mitigate the burden of quotas, which also might explain the high levels of national content used to meet European quotas. First of all they repeat programs, and regulatory authorities tolerate this. Head of the Programme Sector in the Macedonian Broadcasting Council, Emilija Janevska, acknowledged that allowing one or two repeats of the same programme to count towards the fulfilment of the quotas was necessary, and that without it stations would be hard-pressed to meet the requirements (interview, May 2011). Another form of repetition is practiced by regional stations in Slovenia, who re-broadcast each other's in-house programs (interview, Stipe Jerić, Televizija RTS, April 2011). This means that the contribution to quotas in categories such as drama and documentary can be disproportionate to the actual number of programs aired.

The second strategy that television stations in these cases seem to pursue is to rely on cheap to produce, largely in-house production. This is made possible by the vague, broad genres allowed and the lack of reference to other characteristics such as quality. This includes localised versions of international entertainment formats, which Esser (2007; 2009) identified to be a significant portion of domestic programming, and which can garner high rating figures for the television stations. In Macedonia, upon examination of television programme schedules from 2008 and 2009, I found that the programs qualifying for national and European quotas were largely studio-based talk shows. Though split almost equally between informative and entertainment themed shows, the format of guest(s) and host talking in a studio was the same. As Boris Arsov, a member of the Macedonian Broadcasting Council, stated, "filling the quota is easy, you and me sit in a studio and chat for an hour or two and there's your programme" (interview, April 2011). It is easy to call into question the quality of this kind of programming, as Arsov and many of his colleagues do. However, the programs include morning shows with guests from local charities and community groups, political talk shows, and entertainment or lifestyle programs with local musicians and celebrities as guests. Past research has demonstrated that these kinds of programs can play a role in the negotiation of cultural norms and even political views (See Livingstone and Lunt, 1994). This complicates making a simple link between the

quality of programs and their role in contributing to cultural aims. It suggests that maybe even programs of low production quality and one-off formats can still contribute towards the cultural goals for which quotas are instituted.

European quotas do not seem to be doing much to protect the European creative industries, but in combination with national quotas they appear to be increasing the proportion of national content on air in European countries. Though meeting quota requirements could pose a challenge to television stations, particularly in smaller countries, stations use their position as both producer and procurer of content to mitigate the burden as much as possible. They rely on cheap forms of production, namely studio based talk or interview shows and to a lesser extent reality shows and international entertainment formats. Some would argue that such programs are devoid of cultural value and damaging to television ratings, but in Macedonia that was not necessarily the case.

Side Effects: Lowest Common Denominator Content and Politicization

Quotas have been criticized for encouraging the type of cheaper to produce content that stations in Macedonia are using by those who consider such programs to be low quality and less culturally valuable products (Anderson et al., 1997; Iosifidis et al., 2005), contributing to commercialization and the spread of lowest common denominator content. In this case the claim that such content is of lower production quality is upheld, however close examination of the programs making up the quotas in Macedonia revealed that they might still be culturally valuable. Cultural value is a highly loaded, perhaps controversial term, and there is no space in this chapter to explore it more fully. However, in order to code for a program's potential contribution to the stated aims of "protecting and nurturing national culture and identity" (Broadcasting Council of Republic of Macedonia, 2007:114), I accepted the concept of the cultural public sphere (McGuigan, 2005) and the idea that language plays a key role in the imagined community of the nation (Anderson, 1983). Coding for cultural relevance was therefore based on the presence of guests or subject matter related to the arts, music, drama, history, religion, pop culture, literature, and language and only

in the Macedonian language.¹ Despite being largely low quality studio shows, 75% of the programs were coded as culturally relevant, with music playing a very significant role either in the form of musicians as studio guests or broadcasts of concerts and music videos.

With stations fulfilling quotas with cheaper content, some scholars claim that content quotas have another negative side effect in that they drive down ratings (Anderson et al., 1997; Crampes, 2008). Therefore, respecting quotas can negatively impact income for the broadcasters and hinder their ability to invest in future domestic content as producers or commissioners, especially in highly competitive environments (Besio, 2008). Macedonia can be considered a highly competitive market because high penetration rates for cable and other subscription services mean that a multitude of foreign channels are available in addition to the many domestic channels. Nevertheless, when excluding the news programs that rate highest in all 4 of the main private Macedonian language stations, a comparison showed that there was no great difference between the average minute rating (AMR) of programs that fulfill the European and domestic quotas and those that come from outside of Europe or genres not included in the quotas. In two stations quota compliant content had slightly higher AMR than other content and in two it had slightly lower AMR, however the differences were not more than one half per cent in any case.

Macedonia's private broadcasters still fight for very small advertising budgets and operate with minimal income. Nonetheless, they do not seem to be additionally burdened by the imposition of content quotas. Their programs are largely low production value shows, but cannot be classified as lowest common denominator content either as they still demonstrate specificity and relevance to the national culture. Evidence from the Macedonia case seems to counter claims that quotas have the negative side effects listed above, but it also suggests there may be a different one. Sixteen per cent of the programs fulfilling the domestic quota had an overtly political subject matter be it in the form of talk shows, interviews, or other studio-based formats. Since only 29% of quota qualifying programs was informative as opposed to

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¹ The data set for analysis included the 24 hour programme schedules from the third week of January in 2008 and 2009 for the four Macedonian language television stations. The sample contained 2576 individual programmes occurrences to be coded. Inter-coder reliability test conducted on 25% of the sample resulted in 17.5% reliability in coding for cultural relevance, below the 20% acceptable level.

entertainment or music shows, and considering that on average news took up 35% of the programs schedules, this indicates a dominance of political content in non-entertainment programming. Macedonia's national private television stations are all directly or indirectly tied to political parties (Šopar, 2008). I suggest this may be cause for concern, not just in Macedonia but in many other countries in Central, Eastern and South East Europe in which media systems are characterized by political parallelism and clientelism (Jakubowicz, 2008).

Quantity and Quality

European quotas structured to increase the quantity of European works and protect the audiovisual production industry seem to be missing the mark, except in that they may encourage more national content on television. Nor are national quotas likely to be supporting the development of independent production or jobs in the domestic creative industries as television stations appear to meet quota requirements with cheap self-produced production. I suggest that the difficult economic conditions and highly competitive markets in which European television stations find themselves are probably more of a factor in the trend towards cheap formats than content quotas. In the particularly dire media market in Macedonia quota qualifying content seems to have just as much income generating potential as other content, excluding the daily news programs. The Macedonian case also indicates that cheap to produce content is not necessarily devoid of cultural value, though a tendency towards "guest in studio" formats may lead to an overabundance of politicians' appearances and political programs.

CONCLUSION

This chapter has shown that US and transnational domination in audiovisual production is not likely to be thwarted by European or national level content quotas. They fail to protect independent production industries in Europe, largely because television stations are not willing or able to bear the financial burden. The structure of European and most national quotas seems to favour the creative industries through the exclusion of news and local sports coverage, which television stations are unlikely to commission or purchase externally. However the definitions of quota

qualifying works include no mention of quality or characteristics other than location or language of production and use vague genre categories. Combined with other details of quota policy at the national level, such as how they are measured and whether repeats are allowed, this leaves much room for television stations to choose the most inexpensive ways of fulfilling the quotas, in many cases relying on in-house production.

As cultural policy, content quotas may protect national cultures rather than achieve any goals related to European level diversity or identity. European quotas have failed to encourage the diffusion of European works within Europe or create an internal market for content. Perhaps its linguistic and cultural diversity will always inhibit the emergence of a pan-European audiovisual sector – a suggestion supported by localisation trends among transnational broadcasters (see Chalaby, 2009) If anything European quotas have led to an increase of national content as stations increase domestically produced programs as the most cost effective way of meeting the European quotas. As shown in the case of Macedonia, even cheap, low quality content can make a cultural contribution nationally, if only in the use of the language and popularisation of music. However, studio based shows involving local musicians or artists are not products that will be traded across borders. Without the capacity to invest in quality drama or comedy series, content quotas will not help small countries contribute to broader European diversity and cultural identity.

In the end content quotas seem to be not much of a burden commercially, but are also of rather limited benefit. They encourage more national content, which probably contributes in some way to preserving national culture and at the very least maintains the presence of the national language(s) on television. For many small countries with unique languages this may be enough of a justification and it seems that they are still likely to be around for some time. Regardless of the actual utility of content quotas, politicians will always be caught in the position of trying not to appear unpatriotic when considering content quota policies. In a large part of Europe, I suggest, they may not be interested in giving up on provisions that have the side effect of more airtime for them as well. Private broadcasters are likely to face content quotas well into the future and will have to continue to comply in the best way they can manage.

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