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The Limits of Empirical Indicators: Media Pluralism as an Essentially Contested Concept

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Introduction

As the chapters in this book illustrate, the notion of media pluralism has become an increasingly central, yet contested, part of media policy debates in both academic discourse and policy practice around the world. The reasons for the topicality of media pluralism as a policy issue are many, ranging from political and ideological trends to changes in the media landscape itself. Apart from the inherent value of pluralism and diversity as key notions of liberal democracy, one practical reason for the resonance of pluralism and diversity in current media policy debates may also lie in their apparent measurability and the illusion of ideological neutrality they imply. In contrast to value-laden notions such as media quality, freedom or social responsibility, pluralism and diversity seem at least in principle measurable and therefore more objective as media policy objectives.

The fact that media pluralism has emerged as a common aim, shared by almost all sides in media policy debates, however, does not mean that media policy no longer involves conflicting values and interests. As recent media policy debates clearly illustrate, there are various opinions on the meaning and nature of media pluralism as a theoretical, political or empirical concept, and the concept can easily be adjusted to different political purposes (see Karppinen 2013).

In the European context, for instance, this has become abundantly clear in the inability of the European Union (EU) to develop a common regulatory framework for media pluralism at a European level (e.g. Klimkiewicz 2009). Within the EU, one response to such political obstacles has been to shift the focus from binding regulations to the ostensibly uncontroversial aim of developing better tools for monitoring and measuring media pluralism. The tool developed within the EU for this purpose, the Media Pluralism Monitor (MPM), for instance, promises to bring 'a stronger evidentiary basis to define priorities and actions for improving media pluralism' and to

'ensure a uniform basis for dealing with pluralism issues and provide a more objective basis for the often heated political and economic arguments' (KU Leuven – ICRI et al. 2009, p. 3).

Such aims to ensure a more objective, evidentiary basis for media policy debates are not limited to the European debates but can be seen as part of a broader tendency to ground public policy-making in objective empirical information, rather than rhetorical appeals to public interest or other abstract political objectives. While empirical indicators may seem a convenient means to bypass political disputes and bring greater objectivity into policy debates, I argue in this chapter that adopting a more empirical approach to assessing media pluralism is not without its problems and limits either.

First, empirical indicators are hardly neutral in a sense that not all aspects of media pluralism are equally amenable to empirical measurement. Any empirical definition of media pluralism will entail choices about which of its aspects are deemed important and which criteria are considered valid for its assessment. The choice of empirical indicators and criteria, therefore, inevitably raises questions as to what political rationalities and assumptions the measuring efforts rest on, what implications they have, and what aspects of media pluralism they possibly ignore.

Secondly, the empirical approaches also raise broader questions about the relationship of facts and values in media policy-making. Understood as a broad normative value that refers to the distribution of communicative power in the public sphere, media pluralism can be seen as an example of an 'essentially contested concept' (Gallie 1956), whose interpretations remain inherently political and dependent on different normative conceptions of the role of media in society. While the use of empirical indicators by no means prevents such normative debate, there is arguably a danger that increasing reliance on 'objective' empirical data in media policy-making may end up veiling normative choices and thus, closing off alternatives from political debate.

The argument in this chapter is not directed against the use of empirical data in media policy as such. The monitoring and evaluation of the effects of policies and changes in the media are undoubtedly essential for both public debate and policy-making. Instead, I argue that the use of empirical data should also be seen as political: it does not offer a means to evade the normative questions raised by different conceptions of media pluralism or relieve policy-makers from the difficult choices associated with the aim of promoting media pluralism.

The demand for empirical evidence in media policy-making

Despite disagreements about the exact meaning of media pluralism as a policy objective, it is typically not treated in contemporary policy discussions merely as a matter of opinion. Instead of viewing it as a justification

for policy initiatives or another abstract dimension of media freedom, there is a clear tendency in media policy to treat pluralism and diversity as tangible, empirically measurable concepts.

The reliance on empirical evidence can be seen as part of a broader tendency to rely on what policy-makers see as more reliable quantitative methods. According to Des Freedman's (2008, pp. 97–8) interviews with American and British policy-makers, for example, there is a sentiment among policy-makers that 'decision-making about the media, like any other area of public policy, should be guided by scientific, rather than abstract principles and by objective, not politicized sources of information'. The reliance on empirical evidence is thus commonly seen as a safeguard against vested political interests or as a tool for more objective decision-making.

In line with the growing demand for objective, empirical data and performance metrics in public policy-making, there is also a mounting body of academic research that addresses media pluralism and diversity as measurable concepts (e.g. Napoli 2007). In practice, this includes a wide variety of empirical approaches used in different contexts to measure media pluralism and diversity. Typically, the measures employed in policy-making have focused mainly on market structures, measuring the number of sources available, or on relatively rough calculations of content diversity, such as program type diversity in television (e.g. McDonald and Gimmick 2003; Van Cuilenburg and Van der Wurff 2007). More elaborate measures of the ideological or institutional diversity or voices and viewpoints in news coverage have also been developed (e.g. Benson 2009), but such interpretative approaches have been much less used in actual media policy-making.

However, it remains fair to say that no common definitions of what media pluralism or diversity mean, and how different indicators relate to these definitions, have emerged in the literature on empirical indicators. This has understandably also invoked criticism of empirical approaches to media pluralism and diversity. Edwin C. Baker (2007, p. 77), for example, has argued that the empirical measurement of diversity 'represents a misguided but increasingly common empiricist belief that quantifiable facts can give answers to normative questions – and can do so without any coherent explanation for how the quantified facts even relate to the normative questions'.

In the absence of commonly accepted definitions or frameworks for evaluating media pluralism, empirical indicators have so far been easy to criticize for being either arbitrary or politically purpose-oriented. A well-known example of this is the Diversity Index, developed by the United States (US) Federal Communications Commission (FCC) in conjunction with the reform of media ownership rules in the early 2000s (discussed in more detail by Philip Napoli in Chapter 7). At the time, the use of empirical evidence to justify the deregulation of media ownership rules ignited an unexpected

storm of criticism, which also generated a continuing debate on the proper ways to empirically measure and conceptualize diversity and pluralism in the media (e.g. Howley 2005; Wildman 2007).

Besides the problems associated with reducing the complexities of media diversity to a mechanical index, the critics of the Diversity Index have argued that the empirical index was designed with a specific purpose in mind (justifying the deregulation of ownership restrictions) and that the studies used in the process employed only economic or management perspectives and ignored alternative, social or cultural perspectives, including the protests of concerned citizens (Freedman 2008, p. 99). Interestingly, the FCC has since given up its attempts to measure diversity by means of a single index, because 'there are too many qualitative and quantitative variables in evaluating different markets and combinations to reduce the task at hand to a precise mathematical formula' (FCC 2008, p. 43).

The experience of the Diversity Index in the US thus provides a warning example of the problems and pitfalls associated with seeing pluralism and diversity as linear values that can be measured or quantified to justify media policy choices as 'objective' or 'scientific'. Interestingly, in the context of the Media Pluralism Monitor (MPM) and the more recent European attempts to develop empirical indicators for measuring media pluralism, many of these warnings also seem to have been recognized. In contrast to the Diversity Index, the process of drafting the MPM has indeed been based on very different premises and objectives.

In comparison to most other empirical metrics of media pluralism and diversity, the MPM takes a much more comprehensive and holistic approach. By bringing together a variety of quantitative and qualitative indicators that relate to different aspects of media pluralism (such as political, cultural and geographic pluralism) and various stages of the media value chain (supply, distribution, use), the MPM can claim to 'offer a multi-faceted approach to media pluralism' and to produce 'a complete and correct analysis' of media pluralism in all its complexity (KU Leuven – ICRI et al. 2009, p. 21).

The MPM also emphasizes the transparency of its methods and their scoring. The monitoring tool is designed to be used not only by regulators but also non-governmental organizations, academic scholars and other stakeholders. The authors of the study also emphasize that the monitor is a dynamic tool that can be updated and further developed based on stakeholder comments and experiences from its use. Given the flexibility of its approach and the sheer number of indicators, the MPM is obviously an improvement from previous attempts to assess media pluralism based on any single criterion, such as media ownership concentration or program type diversity only.

In practice, different types of empirical indicators inevitably have different biases and flaws, which of course is a good argument for approaches, such as the MPM, which combine different types of quantitative and qualitative

indicators rather than placing too much weight on any one type of metrics. Given the ambiguity of pluralism as a media policy objective and the variety of perspectives from which it can be assessed, however, it is doubtful if any empirical measures of media pluralism can ever claim to be fully neutral or comprehensive.

Even with such a broad and inclusive approach, questions remain if all aspects of media pluralism are equally amenable to empirical measurement and how different indicators are prioritized and interpreted. Furthermore, while the MPM repeatedly emphasizes that it offers a diagnostic, not a prescriptive tool, and that it does not advocate specific remedies or policy responses (KU Leuven – ICRI et al. 2009, p. 6), there remains ambiguity about the relationship between empirical indicators and the political and normative questions that they are intended to inform.

In the following, I further elaborate on these two types of problems, or limits, involved in the empirical measurement of media pluralism. First, I discuss the choice of empirical indicators deemed relevant for assessing media pluralism and the biases that different empirical approaches may entail. Second, I address the broader question of the relationship between empirical evidence and political value judgments and their relative balance in media policy-making. Although the MPM is used here as an example, the issues discussed are not specific to the MPM but also concern empirical measurement of media pluralism more broadly.

What to measure? Dimensions of pluralism and the biases of empirical indicators

In its broadest sense, media pluralism refers to some of our most taken-for-granted assumptions about media and democracy: the broad belief that the media ought to reflect different interests, values and cultures in society, and provide public access to the widest possible range of voices. On closer analysis, it becomes clear that the concept has multiple dimensions and that it can be analysed on several levels. Attempts at a systematic definition of media pluralism are further complicated by the seemingly contradictory or even paradoxical relationship of its different aspects to one another (e.g. van Cuilenburg 1998). An increased number of media channels or outlets, for instance, can mean more choice for consumers, but this does not necessarily translate into better provision for minorities or a fairer distribution of communicative power in any broader sense. Increasing competition in the media market can lead to more diverse media content or further homogenization, depending on the perspective. Attempts to promote one form of pluralism through ownership or content requirements may well undermine other forms of pluralism.

In many ways, the ambiguity of media pluralism as a descriptive and evaluative concept has only been amplified by technological developments

and the proliferation of new media forms. This also raises the legitimate question of whether media pluralism really amounts to anything more than an empty catchphrase. As Denis McQuail (2007, p. 42) notes, arguments for pluralism or diversity 'sound at times like arguments on behalf of virtue to which it is hard to object' – yet the inclusiveness and multiple meanings of the concept also expose some of its limits, so 'we should perhaps suspect that something that pleases everyone may not be as potent a value to aim for and as useful a guide to policy as it seems at first sight'.

The use of 'objective criteria' in policy decision-making easily misses the fact that there are contradictory goals that imply different definitions of pluralism. The fact that different aspects of pluralism may be at variance with one another also raises some inherently political and normative questions as to what kind of pluralism it is that we are really looking for.

This of course is a question that can be endlessly debated theoretically and philosophically. However, it can be argued that the success of political ideas and concepts to gain specific meanings in contemporary policy debates often relies not on grand ideological or theoretical clashes, but on their ability to become institutionalized and embedded in the norms, standard practices and calculations of policy-making (see, e.g. Rose and Miller 1992; Hay 2004). In this sense, it can be argued that empirical measures of media pluralism not only reflect different definitions of media pluralism but also work as part of the intellectual machinery that serves to translate the abstract concept of media pluralism into the realm of political calculation and action.

All empirical approaches, of course, involve inherent oversimplifications that result from the translation of complex political issues or concepts into objective empirical measures. While everyone understands that empirical measures cannot give a complete picture of the complex issues involved, measuring exercises can become in a sense self-fulfilling prophecies. As Baker (2007, pp. 19–23) notes, the relevance of empirical evidence and the type of evidence needed for any media policy inquiry depends entirely on the issue at hand. However, as some issues are obviously less amenable to measurement by empirical indicators than others, there is the risk that the availability of particular objective data arbitrarily determines what issues are debated. In other words, there is a danger that conceptual classifications made for empirical and practical purposes will start to guide our understanding of media pluralism as a political and normative objective. It is necessary therefore to analyse critically what kind of empirical data would be relevant for debates on media pluralism and what kind of explanations of evidence can and cannot be drawn from that data.

As not all aspects of pluralism are equally amenable to empirical measurement, one obvious danger of focusing too much on empirical data is that those aspects of media pluralism that cannot be empirically measured are suddenly marginalized in public debate. A typical bias in empirical

approaches to media pluralism arises from the fact that while the market definition of pluralism as consumer choice is rather easily quantified and measured, the more qualitative and multifaceted ideals associated with the concept are clearly not. The remit of public service broadcasting, for example, is especially intangible and normative, embedded in the ideas of public sphere, citizenship, pluralism, creativity and national culture – all values that are notoriously difficult to define in an unambiguous way, let alone measure empirically (Coppens 2005).

Consequently, it can be argued that the reliance on empirical measurements tends to skew policy-making towards market-driven objectives and prejudice against intangible cultural and social objectives, which tend to be by nature abstract and more difficult to quantify. The arguments typically promoted by the media industry, for instance, tend to be easier to articulate in terms of economic and empirical measurements than those of civil society or critical academics. Furthermore, less well-resourced actors in the policy process may also lack the resources of industry to gain access and influence the data that will be used in policy-making, such as large-scale statistical evidence (Napoli and Seaton 2007). The emphasis on objective scientific data, instead of political arguments, can thus function to marginalize the public from the policy process by reserving it exclusively for the experts, lawyers and lobbyists who are usually in prime position to supply the sort of information that policy-makers demand. Freedman (2008, p. 101) also notes that the hostility to ‘abstract ideas’ involved in the tendency to rely on objective empirical data has also meant that many of the critical academics are excluded from policy circles.

Empirical evidence and political judgment

Apart from the inclusion or omission of particular perspectives or indicators, it can thus be asked if seeing media pluralism as an empirically measurable variable involves a more systematic bias. The representation of media pluralism as a measurable variable, instead of a contested political value, may imply a shift from the normative and political questions to more narrowly defined technocratic and instrumental definitions of media and culture, a move that itself is not without normative and political implications. In this sense, the problem of empirical indicators is not only that they are insufficient, but that they create an illusion that questions of media pluralism or media performance are conceptually unambiguous problems that can be solved by technical means.

Appeals to empirical evidence or objectivity are also popular rhetorical tools in media policy. As Maria Michalis (2007, p. 17) notes in her study of European media policy, although governance is always a political affair, ‘its portrayal as apolitical, technocratic and objective enhances its chances of being accepted’. Similarly, Napoli and Seaton (2007) acknowledge that

rather than necessarily bringing greater objectivity, a greater reliance on empirical research also involves the possibility of biased analyses being injected into the policy process by stakeholders with vested interests in specific policy outcomes. Consequently, it is not always clear if reliance on supposedly objective metrics makes the outcome less or more arbitrary.

Overall, there is little reason to assume that the evidence-based approach is automatically impartial or free from bias or political influence. Instead, at worst it can mean that tensions between different policy objectives, or different political rationalities, are increasingly veiled in the discourses of expert assessment and empirical criteria instead of being presented as genuinely contrasting political choices.

Instead of an objectively measurable concept, I have elsewhere argued for a critical notion of media pluralism that relies on a more holistic approach that places the media in a broader social context and recognizes the wider economic, political and cultural relations of power (Karppinen 2013). In short, the main point of such an approach is that media pluralism is about social relations and about the role of the media in the overall distribution of power in society, not about multiplicity of choices as such. From this perspective, the danger of seeing media pluralism exclusively as an empirical notion is that broader democratic and political ideals, and the mode of discourse they involve, become marginalized in policy-making.

None of this, of course, implies that empirical indicators and data would not have a place in media policy-making. Even if pluralism is understood more broadly in terms of power relations and communicative inequalities, there is a need for policy-relevant empirical information. The identification of various forms of exclusion and power relations inherent in the structures of the media is also by and large an empirical question. Instead of dismissing the relevance of empirical evidence, the argument here is that we need to critically reflect on the relationship between value questions and factual questions. When discussing the justification of policies and contradictory policy objectives, it is important to make sure that the terms and scope of policy debates are not totally determined by the availability of empirical evidence. Also, the increasing demand for empirical data makes it crucial to consider the political implications of different types of measures and to openly debate the most useful ways of employing these tools.

In order to discuss the relationship between empirical measures and their underlying values and principles, media policy research also needs richer intellectual resources, which include not only different empirical approaches but also recent debates in political philosophy and democratic theory.

Furthermore, clarifying the values and principles at stake does not necessarily mean that there has to be a consensus on the meaning of abstract objectives, such as media pluralism. Like other normative concepts in political thought, media pluralism remains an ideal whose specific

meaning and proper realization will probably always remain open-ended and indeterminate.

From the perspective of empirical measurement, contestability and conceptual ambiguity are seen as problems, but from the perspective of democratic politics, the ongoing contestation of normative principles, such as media pluralism, can also be viewed as desirable. As with notions like democracy, justice or freedom of speech, there is no single technical solution to the problems of media pluralism; it is not something that can be realized in any definitive or perfect sense.

Conclusion

Given these limitations of empirical approaches to media pluralism and their claims of objectivity or comprehensiveness, the empirical indicators of media pluralism should be seen more as an addition to the media policy debate, rather than as objective instruments that bring closure to political contestation. All empirical approaches require critical self-reflection on the concepts, indicators and criteria they employ. In addition to developing new criteria of assessment, we need to ask what aspects are emphasized by the different criteria, what their premises are, and what possible political consequences they have.

To be fair, the people who develop and employ empirical indicators, such as the Media Pluralism Monitor, are often well aware of these problems. Despite the rhetoric of neutrality and objectivity, the MPM, for example, does not claim to offer an ultimate solution to the challenges of media pluralism. Apart from its aim to provide an objective and evidentiary basis for media policy-making, the MPM is also presented as a practical and evolving instrument that can be used to stimulate public debate about media pluralism.

In the end, the most valuable contribution of the MPM, and other such empirical indicators of media pluralism, is therefore not that they would objectively settle political disputes and disagreements, but on the contrary, that they stimulate new debates about the meaning of media pluralism and different threats to it. If nothing else, the fact that the MPM contains no less than 166 indicators illustrates the complexity of media pluralism as a policy objective and questions some of the more reductionist uses of the concept. Even if these indicators fail to bring closure to political debates about the definition of media pluralism, they can hopefully help keep the issue of media pluralism on the media policy agenda.

References

Baker, C.E. (2007) *Media Concentration and Democracy: Why Ownership Matters* (New York: Cambridge University Press).

- Benson, R. (2009) 'What Makes News More Multiperspectival? A Field Analysis', *Poetics*, 37, 402–418.
- Coppens, T. (2005) 'Fine-tuned or Out-of-key? Critical Reflections on Frameworks for Assessing PSB Performance', in G.F. Lowe and P. Jauert (eds) *Cultural Dilemmas in Public Service Broadcasting*, 79–100 (Göteborg: Nordicom).
- FCC (Federal Communication Commission) (2008) *Report and Order and Order on Reconsideration*, FCC 07–216.
- Freedman, D. (2008) *The Politics of Media Policy* (Cambridge: Polity Press).
- Gallie, W.B. (1956) 'Essentially Contested Concepts', *Proceedings of the Aristotelian Society*, 56, 167–198.
- Hay, C. (2004) 'The Normalizing Role of Rationalist Assumption in the Institutional Embedding of Neoliberalism', *Economy and Society*, 33(4), 500–527.
- Howley, K. (2005) 'Diversity, Localism and the Public Interest: The Politics of Assessing Media Performance', *International Journal of Media and Cultural Politics*, 1(1), 103–106.
- Karppinen, K. (2013) *Rethinking Media Pluralism* (New York: Fordham University Press).
- Klimkiewicz, B. (2009) 'Is the Clash of Rationalities Leading Nowhere? Media Pluralism in European Regulatory Policies', in A. Czeppek, M. Hellwig and E. Nowak (eds) *Press Freedom and Pluralism in Europe: Concepts and Conditions*, 45–74 (Bristol: Intellect).
- KU Leuven – ICRI, Jönköping International Business School – MMTTC, Central European University – CMCS, Ernst & Young Consultancy Belgium (2009), *Independent Study on Indicators for Media Pluralism in the Member States – Towards a Risk-Based Approach* (Final Report and Annexes: User Guide, MPM, Country Reports, prepared for the European Commission) (Brussels: European Commission), <http://ec.europa.eu/digital-agenda/en/independent-study-indicators-media-pluralism> ('EU MPM Study').
- McDonald, D. and J. Dimmick (2003) 'The Conceptualization and Measurement of Diversity', *Communication Research*, 30(1), 60–79.
- McQuail, D. (2007) 'Revisiting Diversity as a Media Policy Goal', in W. Meier and J. Trappel (eds) *Power, Performance and Politics: Media Policy in Europe*, 41–58 (Baden-Baden: Nomos).
- Michalis, M. (2007) *Governing European Communication: From Unification to Coordination* (Lanham, MD: Lexington Books).
- Napoli, P.M. (2007) 'Introduction', in P.M. Napoli (ed.) *Media Diversity and Localism: Meaning and Metrics* (Mahwah, NJ: Lawrence Erlbaum).
- Napoli, P.M. and M. Seaton (2007) 'Necessary Knowledge for Communications Policy: Information Asymmetries and Commercial Data Access and Usage in the Policymaking Process', *Federal Communications Law Journal*, 59(2), 295–330.
- Rose, N. and P. Miller (1992) 'Political Power Beyond the State: Problematics of Government', *British Journal of Sociology*, 43(2), 173–205.
- van Cuilenburg, J. (1998) 'Diversity Revisited: Towards a Critical Rational Model of Media Diversity', in K. Brants, J. Hermes and L. van Zoonen (ed.) *Media in Question*, 38–50 (London: Sage).
- van Cuilenburg, J. and R. van der Wurff, (2007) 'Toward Easy-to-Measure Media Diversity Indicators', in E. de Bens (ed.) *Media Between Commerce and Culture*, 99–113 (Bristol: Intellect).
- Wildman, S. (2007) 'Indexing Diversity', in P.M. Napoli (ed.) *Media Diversity and Localism: Meaning and Metrics*, 159–176 (Mahwah, NJ: Lawrence Erlbaum).