Comparative Media Systems and the Public Sphere

This essay will start with a short summary of the economic and political factors that enabled early mass media systems like the printing press to enable itself as a 'fourth estate' within society and therefore as an organ of public opinion before introducing the three media models provided in the comparative analysis of Hallin and Mancini's 'Comparing Media Systems' in order to arrive at a comparison between a radical-constructivist versus a consensus-based approach towards an analysis of media models to provide an answer to the question in how far a comparative analysis can provide an increased understanding of socio-political contexts in relation towards media systems.

According to Jürgen Habermas (1989), the context of the mass media has always been a social and political one since the press established itself as a fourth estate, apart from the initial "dualism of the ruling estates and of the prince" (1989:27) from the thirteenth century on. What Habermas calls the 'bourgeois sphere', constituted firstly of private people who were somehow involved in a process of production and trade and whose gatherings served to form a public body which was directed towards the monarch. The 'public' assemblies at the courts served to discuss matters of conduct and leadership of the monarch, who still was the sovereign in the very beginnings of a 'public' debate, but they also began to question his absolute sovereignty. After some transformations within the 'bourgeois sphere', this questioning of power took on the form of a reasonable debate although the initial motivation for its emergence was largely economical (1989:14).

As a consequence of this development, the economy that previously was entirely based on a system of feudal organization of agricultural production was now transformed in two distinct ways. First, due to the existence of a commercial trade economy, the process of economic production of every family had gained a central role in their means of existence. The commodities that now were produced on a private scale began to matter in a broader sense, since they also represented the constituents of the commodity market and therefore became of general interest in terms of the mode and quantity of economic production.

Due to the nature of long-distance trade, it also was necessary for the merchants to acquire information about non-local events. This information had to be provided steadily and became more frequent as the commodity traffic increased.

"From the fourteenth century on, the traditional letter carrying by merchants was for this reason organized into a kind of guild-based system corresponding to their purposes. The merchants organized the first mail routes, the so-called ordinary mail, departing on assigned days." (1989:16)

Thus, with the support of the early mail system, a continuous traffic of information came into being. Technically, it was only a small step from the first handwritten letters addressed to certain individuals to printed versions of commodity market information, although this alone is not enough to speak of the emergence of a press, since this form of communication was still private information. The mercantilist form of early capitalism needed to undergo further developments until a phase was reached that can be compared to the modern understanding of 'public' and 'state'. Although the private merchants gained a lot of influence, they harvested on the pre-established modes of production without fundamentally transforming the system of its governance. This only happened to a time when the businesses of commodity traffic changed their mode of organization to a model that incorporated the expansion of markets, what also meant that they had to undertake risks in order to open up new markets. For this reason, those companies became to be organized as stock companies. Apart from that, it was also necessary to create a form of political security in order to ensure the continuity of the new markets. Thus, the companies became both economically and politically institutionalized and transformed their model of economy based in a local community towards a national economy based on territories.

The feudal state system alone was no longer able to cover the expenses that were needed to sustain an expansionist economic system. For that reason, taxation was created and it was administered by the bureaucracy that governed the treasury. At the basis of this transformation was the separation of the monarch's personal possessions from the belongings of the state which included the control of local administrations by state bureaucracy.

"The reduction (…) of the estate based authorities by those of the territorial ruler created room for another sphere known as the public sphere in the modern sense of the term: the sphere of public authority. The latter assumed objective existence in a *permanent* administration and a *standing* army. Now continuous state activity corresponded to the continuity of contact among those trafficking in commodities and news (…)." (1989:18)

In this sense, the actual policy of the state corresponded more towards a balance of the conditions of trade relations. Not only did the early capitalist trading system change the modes of politics, but also the modes of production, which can be regarded as an early capitalist one, because the measurement of wealth did not only concentrate on the accumulation of goods, but also on an increase of employment. Parallel to that, the political systems that developed around a territory based economy were likely to take on various forms, according to the initial conditions that could be found within a certain nation and according to the specific historical events and changes the nation underwent.

The increased development of information traffic connected to the commodity trade and the final publication of formerly private business

information can be considered as an effect of the commodification of the information itself. It was the commercial news who first provided the technical framework and the logistics necessary to create and distribute 'mass' information, but with the emergence of the first political journals by the beginning of the early seventeenth century it became obvious that they also served representational aspects of the state administration. The editors of those journals mostly started out as private intelligence agencies and gained financial support from advertisers. These advertisers were mostly under state-contract and in this way, the administrative state apparatus was able to influence the information provided in the journals. Within this mixture of market laws and political influence, the first obvious relationship between politics and the early precursors of modern mass media came into being. This also had effects on the on the composition of the 'bourgeois sphere'. A new stratum of state administrators joined the existing strata of the capital owners who were interconnected with the early commercial system like banking, manufacture and trade. It is also important to mention that the new members of this sphere did not only differ from the rest of the population in terms of financial and political power, they also became increasingly literate. The aristocracy as a guarantor of power was about to lose its influence since pure status alone could not ensure the sustainability of individual influence within the 'bourgeois sphere'. This now had to be achieved by a constant flow of information and knowledge and rational-critical debate (1989:24).

Habermas further outlines a shift in the tasks of the public sphere, which, after being primarily engaged in civic political matters now moved towards a concern in civic social matters, that is, the regulation of civil society. Before this shift, the debate over absolute sovereignty was the main objective of a 'bourgeois sphere', but after certain stages of a transformation of power regulation took place, the knowledge and the procedures that were previously established in a polemic exchange of opinions now were introduced into the body of civil society. In order to distinguish this new form of polemic from the traditional one, a legal basis had to be created that ensured an engagement of this kind in a general and abstract context of norms. They had to be universally valid and had to ensure a certain degree of permanence. This helped to develop a concept of civil society which asserted itself as the legitimate basis of those norms. In the terms of the radical constructivism, the legitimacy of the system of civil society gained a level of *autopoiesis*, meaning that the basis of sustainability of its legitimacy now lies in the system itself and is no longer dependent on outside sources, with the underlying assumption of a difference between a system and its environment.

"The function of the mass media lies after all that in the directing of self-observation of the social system –by which we do not mean one specific object amongst others, but a way of splitting the world into system (that is, society) and environment. (…) What is also involved is an observation which itself generates the conditions for its own possibility and in this sense occurs autopoietically. (…) This means that also the impetus for

further communication is reproduced within the system itself and cannot be explained anthropologically, as a drive for knowledge, for example." (Luhmann, 2000:97)

In other words, to trouble the terminology of Max Weber, the civil society now gained what he calls *rational-legal authority*. In this sense, it had to be ensured that the administrative apparatus that regulated civil society adhered to universal principles and rules, meaning that the key components were bureaucracy and legality. Within the shift from political to social governance in the public sphere, the state apparatus had developed principles with which it could enable itself to embed the actions of governance into a legitimate framework that every member of civil society could agree on.

This development was the crucial basis for a further transformation of the role of the press. It was only under those circumstances that the 'mass' media could engage in a role of a public organ, establishing itself as an institution of a critical debate between the state and civil society. As soon as news journals could develop the social and political authority to confront the government, the press became a fourth estate, after the division of the property owners and the monarch as the first two estates and the public sphere as a body of regulation and governance as the third. Keeping this in mind, a comparative analysis of media systems can offer distinct views on media systems. Only with a genealogy of the public importance and institutional role of the mass media can differences in countries be properly addressed and examined.

In their book 'Comparing Media Systems' Hallin and Mancini seek to develop criteria with which the relation between the mass media and politics can be described in terms of a comparative analysis. It is not surprising that they ascribe major importance to the historical existence or non-existence of mass circulation press in a specific country, since this seems to provide first approach to examine the relation between the media and the state and also between the different forms of mass media. In order to arrive at their concept of three models of media systems, they outline preliminary ideas present in media studies in order to explain their selection of criteria, but also to outline their mode of analysis within this context.

Firstly, they try to emphasize the effect of what they call 'political parallelism' on the media, since the argument goes along the lines of the Habermasian argument, that

"From the beginning of the print era, particularly from the time of the Reformation, political advocacy was also a central function of print media, and by the late eighteenth to early nineteenth century, when the newspaper began to emerge as a force in political life, this became its principal function (...)" (Hallin and Mancini, 2004:26)

Political parallelism consists of several criteria in order to make statements about its degree in a specific case. It refers to the content of

the media as well as to analogies on the level of organization between media and political party systems. Also, the term can be used in order to examine in how far the media personnel is involved in any kind of political activism and if this is related to personal success of individuals within the media system itself. Furthermore, the issue of partisanship can also be addressed within the context of political parallelism, in terms of how strong the political 'bias' of the audience is. Also, the notion of pluralism plays a role in the analysis of political parallelism, namely the distinction between external pluralism, which can be exemplified in terms a different political bias from one media company towards another competitor (press, television, etc.) in the same country and internal pluralism which might be located within the same company among the editors, for example.

It is necessary to point out that a form of bias is not an intrinsic feature in mass media systems in general. By the beginning of the nineteenth century, there has been an ideological shift within the mass media systems from sheer partisanship to a more objective form of coverage, driven by commercial forces rather than political influence. This idea of 'objective journalism' was most successful in the Northern American countries and it becomes obvious in the study of Hallin and Mancini that other European countries are in the process of adapting this 'Liberal Model'.

Another criterion to define media systems is their degree of professionalization, which Hallin and Mancini develop first under the aspects of autonomy, meaning in how far journalists have a possibility to control their process of work within the institution. Secondly, there is the aspect of distinct professional norms, such as ethical principles, estimating the worthiness of information to publish or norms of allocating professional prestige and judging the quality of journalistic practice. At last, it should be a criterion of professionalism to determine the orientation towards a public service role, whether or not the media themselves are concerned with the matter of public trust and if there are some self-regulatory, institutional mechanisms within the media system.

The concept of professionalization can be threatened by what Hallin and Mancini call 'instrumentalization', whether it will be of political of commercial nature, or both at the same time. It is to some degree obvious that the development of a professional understanding is, on one hand, dependent on historical factors and, on the other hand, can change them. In a social environment where political parallelism is strong, it might be harder for professionalism to develop, but once it does, it is likely that it will diminish the consequences or at least the occurrences of political parallelism, although Hallin and Mancini find forms of coexistence between the two in various European countries.

Having discussed all preliminary considerations, it is now possible to introduce the three media models of Hallin and Mancini. First, there is the 'Mediterranian' or 'Polarized Pluralist' model. They subsume most of the countries in South-Western Europe under this model, hence the term 'Mediterranian'. All of them are characterized by ideological and political conflicts of a large scale and a relatively late arrival at a system of liberal

democracy. Features of the 'Polarized Pluralist' model are a press with low mass-circulation and an emphasis on electronic media like television and radio. The degree of political parallelism is relatively high and the media often gets 'instrumentalized' by various groups of interest, such as the government or influential capital owners. The degree of state regulation of broadcasting is high, although the success of this regulation is not always truly efficient. Overall, the development of a rational-legal authority in the Weberian sense is comparatively low. Hallin and Mancini count Spain, Portugal, France, Italy and Greece into this model.

By looking at the history of the Southern European countries, it becomes obvious that

"(…) liberal institutions, including both capitalist industrialism and political democracy, developed later. The forces of the *ancien régime* – the landholding aristocracy, the absolutist state and the Catholic and Orthodox Church were stronger here and liberalism triumphed only after a protracted conflict that continued in many cases well into the twentieth century. One important legacy of this history is the fact that the political spectrum remained wider and political differences sharper than in Southern Europe than in Northern Europe or North America" (2004:89)

Seen in this historical background, it is not really surprising that the media in the countries of Southern Europe were often exploited to support the politics of the various and often long-lasting conflicts. Because of this, the mass media today are regarded as a means to support political activism and their emphasis in news coverage is rather on comment or ideological valuation than on a neutral presentation of information. This is also due to a relative underdevelopment of a commercial media market which in turn forces the prevalent media to be dependent on institutions outside the media industry, like political or religious groups of interest. Although Habermas (1989:14) and Hallin and Mancini (2004:90) point out that the first commercial press emerged in the city states in Northern Italy in the Mercantilist era, it never got the chance to develop into a real mass circulation press. The Counter-Reformation of that time contributed to prevent the development of the full potential of the Mercantilist press and the centre of mass publication became Amsterdam in Northern Europe.

Also, the members of the public sphere were not so much affiliates of the bourgeoisie but more aristocrats and therefore, the literates of the public sphere at that time were characterised by a form of elitism, not only in an intellectual sense but also in terms of status and prestige. Early and prolonged elitism in a context of public media and strong dependence on external interest groups diminished the possibilities for an onset of a mass circulation press. In the twentieth century, a strong party press developed in France and Italy, just after the Mussolini dictatorship with its massive media censorship and shortly before television should bring linguistic standardization to Italy, whereas in France, the commercial press had developed to some degree in the late nineteenth and early twentieth century, just to be interrupted by the Nazi occupation during

WW II. In both countries, the Communist party press had a strong circulation, reaching its climax in Italy in the 1960s and in France just after the end of the war. Although there has been a phase in France where the liberal idea of journalism served as a model for the local press, but during the war years, the politicization of the press was reinforced by dictatorships and fascist regimes, in both France and Italy. In the years after the second World War, the conditions for electronic media began to emerge and this led to a displacement of the press in favour of the newer media like television and radio.

"The only true mass media of Southern Europe are electronic media, and their importance for the information of mass public opinion is therefore particularly great." (2004: 97)

Although the overall tendency in Southern Europe has been a decline in political parallelism in the most recent decades, there are exceptions like the case of Spain in which its relatively young democracy experiences an ideological division in the local media landscape, mostly driven by interests of competing media conglomerates who are trying to dominate a comparatively undeveloped market. In Italy, the change of the political party system in the 1990s and the rise of Berlusconi's 'Forza Italia' are some of the most prominent examples in political parallelism, since Silvio Berlusconi owns most of the media industry in Italy, but is at the same time legally holding the highest political office in the state.

"In all of the Mediterranian countries political logic tends to play a large role in broadcasting, particularly in news and public affairs programming. This is perhaps most clearly illustrated by the fact that the news agenda is not considered to be governed purely by journalistic judgements of "newsworthiness" but is a question of political policy" (2004: 109)

It becomes obvious that the state plays a relatively large role in the influence of the media in the Polarized Pluralist model, although its potential to successfully regulate media ownership and public broadcasting is limited due to insufficient resources and a high degree of political polarization, but also due to power structures that are outside the area of the public sphere, with certain interest groups bargaining power relations in elitist circles, which leads to a structuring of the public sphere that is different from the structure of the liberal model, with much communication about public governance located outside of the public discourse. Nevertheless, the economic growth and a tendency towards a European integration can be regarded as counter-forces towards this structure, which might result in a reinforcement of liberal values in terms of the media industry and public governance.

As a second model, there is the 'North/Central European' or 'Democratic Corporatist' model. The countries in this model experienced an early development of a mass circulation press and accordingly, the degree of freedom of the press and newspaper consumption by the

population is relatively high. Although the media those countries had a high degree of political parallelism in the past, this tendency is now diminishing and a mixture between a more 'liberal' idea of journalism, that is, objective news coverage and an orientation towards neutral presentation of information, and a 'residual' commentary-oriented form of journalism and moderate external pluralism within the media landscape. Nevertheless, the degree of professionalism among journalists is quite high and formalized organizational institutions are quite common. The 'public role' of the media is not only expressed by the work ethic of the journalists, but also by institutions like broadcasting councils. Along with the idea of a welfare state, the rational-legal authority is also strongly developed. In the category of this model would fall Germany, Austria, Switzerland, the Netherlands, Belgium, Denmark and the Scandinavian states.

A distinct feature of this model, according to Hallin and Mancini, is the fact that it incorporates three sets of features of a media system which seem to be contradictory at first, but engage in a mutual relationship of influence. Firstly, there is coexistence between a relatively high degree of political parallelism compared to the liberal model, but this goes hand in hand with a healthy market for commercial media and a high newspaper regulation. Secondly, the high level of political parallelism is accompanied by an equally strong degree of professionalization among journalists and governing institutions for those standards and also a strong emphasis on autonomy, which is also reflected in the third coexistence, in terms of the early development of press freedom along with an active form of state intervention in terms of public broadcasting and the influence of public interest groups (broadcasting councils, etc.), all oriented towards a model of welfare-state intervention.

In historical terms, the development of a mass circulation press was facilitated through the Reformation and the emergence of the trade cities like Amsterdam, as mentioned above. The power of the *ancien régime* was not as strongly developed as in Southern Europe and gave way earlier to ideas of liberalism. It was in the Northern European countries that the press finally developed as a public organ into a political climate characterized by the earliest forms of rational-legal authority in which the public sphere was more 'bourgeoise' and less aristocratic than in Southern Europe, connected to a high degree of historically early literacy among the populations of those countries, which began with the onset of the Reformation and turned into a form of mass literacy by the beginning of the industrial revolution.

Nevertheless, this region of Europe was also characterized by conflicts in its history, mostly of ideological or theological origin, as the conflict between Protestantism and Calvinism, which contributed to an emergence of partisanship in the mass circulation press.

"One of the most important characteristic of the Democratic Corporatist countries is their strong division into political and cultural subcommunities, a pattern often referred to as segmented pluralism." (2004:151)

Accordingly, the press developed as a means of identity and organization which was necessary for the individual groups but it also contributed to further arguments, ideological division and social conflict. In this context, it is possible to understand how the party press came into being in the Democratic Corporatist model. Fuelled by traditional conflicts, the polemic mode of representation of those conflicts found its manifestation in press partisanship as the rational-legal authority of those countries began to develop further into the early democracies of the twentieth century, like the Weimar republic in Germany, in which a third of the press was linked to political parties and of which Hallin and Mancini refer to as "one of the classic examples of polarized pluralism" (2004:155). During the WW II, Germany suffered a setback in terms of rational-legal authority under the Nazi regime which reinforced banning and censorship of media content, but also witnessed the first European media conglomerate of Alfred Hugenberg, who owned the party-press papers as well as the commercial papers of that time and also was involved in radio broadcasting. As a supporter of the Nazi party, his media empire was completely exploited by the Nazis. After the war, the allied forces sought to support a media system in Germany that served the means of a 'denazification' or re-education of the population. For this reason, party-press parallelism was re-emerging, but it found itself in a comparatively healthy climate among other commercial press publications in the progressing post-war era. As a consequence of the recent German history, the level of professionalization among journalists began to strengthen, although the orientation towards political ideologies prevailed. Nevertheless, the role of the media is not so much regarded as an instrument for political support, but more as a public institution with some degree of responsibility, which is true for all countries in this model.

"(...) the social role of the press, (...) which tend to be seen in the Democratic Corporatist countries not simply as a private commercial enterprise but as a social institution for which the state has an important responsibility. This tradition is manifested in media policy in several ways: the system of the subsidies, in stronger regulation of media industries than is found in the Liberal countries and in strong institutions of public broadcasting." (2004:161)

Those subsidies for the press Hallin and Mancini talk about are existent in all countries except Switzerland and Germany in the form of direct state subsidies, which are especially important for newspapers with small circulations. Although those subsidies exist, the trend in the Democratic Corporatist countries also goes towards a more liberal, market-oriented model and so-called 'catch-all' media which try to structure their content under aspects of commercial success rather than ideological values. Nevertheless, a strong tradition of public broadcasting governance still prevails. The regulation aims at a form of pluralism which seeks to ensure a level of diversity in the media landscape. This diversity should be

incorporated in the governing system itself in order to prevent a uniform model of governance which might diminish the diversity of public media, as in the case of Belgium, for example, where the board of directors in public broadcasting changed along with every general election from the 1960s onward. This philosophy is also reflected in the discussions about media ownership and its political tendencies. It is not so much the concern that a form of instrumentalization takes place. What is of more concern is the potential loss of diversity in the course of monopolization or conglomeration, which goes against the notion of the freedom of the press and against the strong level of rational-legal authority that is prevalent in the Democratic Corporatist model.

The last one of the models is the 'North Atlantic' or Liberal Model, which is also characterized by an early development of a mass circulation press and press freedom. The newspaper circulation in those countries is lower than in those of the 'Democratic Corporatist' model although the market is dominated by commercial papers and political parallelism is low and the media industry is generally marked by a form of internal pluralism. The degree of professionalization is strong and is existing without the formal structure that is existent in the 'Democratic Corporatist' model. The news coverage tends to be information-oriented and neutral and state control of the media is very limited and public broadcasting is almost independent from political interference. Under the category of this model fall the United States, Canada, Britain and Ireland.

As in the previous Democratic Corporatist model, the Reformation and Protestantism played an important role for the early development of a mass circulation press and literacy among the population. In all cases, the development of the British press served as a model for the former colonies, that is, the US and Canada, as well as for Ireland. In the case of the US, the American revolution brought about not only independence from the British Empire, but also propelled the notion of press freedom further than in Britain, which contributed clearly towards a concept of neutral journalism and comparatively high standards of professionalisation among journalists. Also, it helped to develop a commercial press market relatively early which was able to consolidate its position in the local media landscape and to diminish the possibilities for partisan papers, mostly in terms of dependence on press subsidies, which still was common in the beginning and the middle of the nineteenth century. Those subsidies were mostly given by the state or from politicians, which in turn meant that newspapers were somewhat sensitive towards the political orientation of their sponsors. The independence from press subsidies enabled the editors and publishers of the press to become independent political factors in relation to the political parties and the current political climate.

Today, Britain has the highest newspaper circulation among the countries in this model. The figure of 400 newspapers per thousand population is in the range of the circulation of the Democratic Corporatist countries, whereas the rest is below them, but still above the circulation rate of the Polarized Pluralist countries. It was due to the fast growth of

the commercial press that something like a 'fact-centered discourse' in news coverage could emerge.

"Commercial newspapers emphasized news at the expense of the political rhetoric and commentary that had dominated earlier papers. They were innovators in the development of organizational infrastructure to gather news rapidly and accurately, as well as in the development of the cultural forms of factual reporting." (2004:207)

Moving away from obvious political parallelism and partisanship, the newspapers in the Liberal model developed towards a centrist position with less emphasis on commentary and more towards neutrality. The diversity of a particular newspaper or media corporation is ensured through a form of internal pluralism which Hallin and Mancini refer to as the 'separation of church and state' which

"became a key metaphor of American journalistic professionalism had a double meaning. It meant a separation between the opinions of the newspaper as expressed on the editorial page, opinions that reflected the view of the owner, and the news pages, which were the product of professional journalists. It also meant a separation between the business departments of the news organization and the newsroom."

This form of self-regulation also explains why the institutional level of professionalisation in the Liberal model is lower than in the Democratic Corporatist model. What is true for the press, is also true for broadcasting in which the US play an important role since they developed commercial broadcasting before public broadcasting, which only came in 1967, as commercial stations were already around for almost two decades. In Britain, the first commercial television station was introduced in 1954 and made it the first European country to introduce commercial broadcasting. In this sense, Britain has an exceptional role since it relies on a comparatively strong public-broadcasting governance but developed a mixture between commercial and public broadcasting. All those developments took place in a socio-political climate of an autonomous legal system, which plays an important role in the development of rational-legal authority in the countries of the Liberal model. According to Hallin and Mancini, the rational-legal authority has the following consequences for a media system: Firstly, in generates a cultural environment in which the emphasis on neutrality in news-coverage is regarded desirable as well as plausible. Secondly, the sources that provide information gain a level of authority which can be regarded as politically neutral and also contribute to the notion of informational journalism that is prevalent in the US. Thirdly, it reduces the possibilities of instrumentalization and partisanship which are existent in the countries of the Polarized Pluralist model.

"Indeed, the legal and administrative rules in liberal societies often serve precisely to institutionalize the influence of business over public policy, though at times they may open avenues for other social groups to have an influence" (2004:245)

After presenting those comparative media models, it should become clear why the notion of rational-legal authority and its role in a relationship between a media system and its political context is so important for an understanding of those relationships and also why it is necessary to analyse each specific case in order to define the exact kind of relationship between the media and their socio-political environment. Although Hallin and Mancini arrive at the conclusion at the end of their book that all countries they examined tend to orient themselves towards a Liberal model, it remains open to discussion how this orientation takes place and under what circumstances. It is obvious that the opening of markets and market-oriented deregulation politics contributed to a 'liberalization' of media systems, but there a various ways to interpret this liberalization.
Jürgen Habermas claims in 'Transformations of the Public Sphere' that a commercialization process contributed to a form of re-feudalization of the public sphere, leaving the rational-critical debate again in the hands of a few, powerful individuals.

"Thus the original basis of the publicist institutions, at least in their most advanced sectors, became practically reversed. (...) To the extent that hey were commercialized and underwent economic technological and organizational concentration, however, they have turned during the last hundred years into complexes of societal power, so that precisely hteir remaining in private hands in many ways threatened the critical functions of publicist institutions. (...) Whereas formerly the press was able to limit itself to the transmission and amplification of the rational-critical debate of private people assembled into a public, now conversely this debate gets shaped by the mass media to begin with." (Habermas 1989:188)

In this sense, it becomes clear why critics of the Liberal model see a loss in the 'watchdog' role of the press over the government and criticise the emergence of clearly biased broadcasting stations like 'Fox News' within a liberal climate of the North-American media landscape. This certainly has its reasons in a conglomeration tendency of big media corporations due to deregulation policies and global trade. Hallin and Mancini point out that they are sceptical whether the three models they introduce can be put into a kind of order or succession concerning their openness of the public sphere and also they are uncertain about the idea that the Liberal model can be regarded as the ultimate example of media independence from governmental power (Hallin and Mancini 2004:83). Those considerations are more along the ideas of Niklas Luhmann. Coming from a radical-constructivist school of thought, he argues the main contribution of the mass media is the enabling of an increase of communication within social systems. They incorporate existing communication but also stimulate new

communication and are responsible for the production of "Eigenwerte" (self-values) of a society, in terms of norms and evaluations that cannot be introduced as they are from outside but have to come into being by an operational recursion of societal results, opposing Habermas' consensual model.

"The tradition says that the stability of the social system rests upon *consensus* – or even on an explicitly/implicitly agreed social contract, and if no longer upon a commonly held religion, then at least on consensually accepted background convictions, encapsulated in Jürgen Habermas's concept of lifeworld. Were this[1] the case, the mass media would be a destabilizing factor, only out to destroy these presuppositions and to replace them with something the French might call symbolic violence" (Luhmann 200:100)

Luhmann further claims that the reproductive capacity of a society has its foundations in the generations of objects which can be regarded as given in further communication. Without the mass media, those objects would not exist and operations of communication would not exist beyond individual horizons of experience. The mass media ensure this reproductive process and contribute to the dynamic capability of a society to transform irritations of the societal system into recursive communication. With the idea of a consensus, this would not be possible, because

"every explicit communication poses the question of acceptance and rejection anew, puts consensus at stake knowing full well that it is still possible to communicate further even and especially where dissent exists" (2000:100)

In order sum up the various positions, it seems to be a good start to refer to Habermas when it comes to the question of legitimacy of the media and its historical role in the emergence of a public opinion. In order to explain and analyse new phenomena in media systems and their interdependence in a modern, de-stratified society, Luhmann seems to be the bettet choice, especially since the early Habermas (the original text of 'Public Transformations' was written in 1962) leaves only criticism to the new development of commercial broadcasting and its socio-political implications. In reference to Hallin and Mancini, the attempt has been made here to bring the two conflicting positions of Habermas and Luhmann together in order to provide some further theoretical framework for a comparative analysis of media systems. Nevertheless, the way 'Comparing Media Systems' proposes is a very good starting point in understanding that every specific media system has a different background that is worth to be analysed by itself and only then put in a

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[1] Authors note: Obviously there is a translation error in the English version of the text. The German text says: "Were this the case", assuming that Habermas would be right and then presenting a counter-argument. The English version states: "Were this not the case" and presenting an argument against Habermas' position, which seems confusing and illogical from the structure of the argument.

framework of reference towards a categorization. In this sense, a comparative study of media systems proposes and inductive way of analysing media and socio-political contexts, whereas the presupposition of a general standardized media system in terms of the North American liberal model is the deductive approach. As it is known from many other disciplines, from epistemology to artificial intelligence research and cybernetics, the inductive approach is often incomparably harder but it is necessary to have both in order to analyse any phenomenon in an academic way.

In this sense, it is necessary to look at a specific country in both ways, deductive and inductive in order to properly analyse the relationship of the media system and its socio-political implications. With the framework provided here it is possible not only to say something about the history and the structure of media systems in general, the comparative analysis according to the three models also provides a reference for analysis in a more specific way. Hallin and Mancini repeatedly point out that their models should always be regarded as such and that some countries are definitely borderline cases in their classification system. Nevertheless, the overall tendencies and also the history of certain countries can be summed up in certain categories, and in this sense, Hallin and Mancini make an inductive approach with every country in order to arrive at a model of categorization in order to provide the 'bottom-up' as well as the 'top-down' way of analysis.

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