

**Government Influence on the Press in Democracies,
Journalists' Perception of the Influence, and the Media Environment
— The Cases of South Korea and Germany —**

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Table of Contents

Chapter 1. Introduction

1.1 Background of the Study.....	1
1.2 Objectives of the Study.....	3

Chapter 2. Literature Review and Theoretical Study

2.1 The Press.....	4
2.1.1 Reason for Existence of the Press.....	4
2.1.2 Concept of ‘the Press’.....	6
2.1.2.1 The Press as an Act itself: Journalism.....	7
2.1.2.2 The Press as a Means of an Act of Journalism: Media.....	7
2.1.2.3 The Press as an Actor who Performs Journalism: Journalists.....	9
2.1.2.4 The Press as an Agency that Conducts Journalism: Media Companies.....	10
2.1.3 Social Roles of the Press, and the Consequent Friction with the Government.....	11
2.2 Government.....	14
2.2.1 Concept of ‘Government’.....	14
2.2.1.1 Government Distinguished from the State.....	14
2.2.1.2 Government’s Sub-division and Scope.....	15
2.2.1.2.1 Government at an International Level.....	15
2.2.1.2.2 Government at a Domestic Level.....	16
2.3 Government and the Press.....	18
2.3.1 Government vs. the Press: Ideological Conflict, Inverse Relation of Power.....	18
2.3.2 What Governments exert on the Press.....	19
2.3.2.1 ‘Press Freedom’ as a Relative Concept.....	19
2.3.2.2 Concept of ‘Press Control’ (with tracing preceding studies).....	20
2.3.2.2.1 Relevant Keywords: Authoritarian Regime, Self-Censorship.....	25
2.3.2.2.2 Types of Press Control.....	29
2.3.2.3 Concept of ‘Press Regulation’.....	31
2.3.2.3.1 Background of the Idea for Press Regulation: Emergence of the Doctrine of Social Responsibility.....	35
2.3.2.3.2 Types of Press Regulation.....	38
2.3.2.4 Concept of ‘Influence over the Press’: Extensively during Communication.....	42
2.3.2.4.1 Relationships formed by Mutual Influences.....	45
2.3.2.4.2 Ways in which Governments influence the Press during Communications and Public Relations.....	48
2.3.2.5 Conclusion: Things Governments exert on the Press and the Ambiguity of Demarcation among Them.....	50
2.4 Media Environment.....	51
2.4.1 Concept of ‘Media Environment’ and Division into External and Internal Environments.....	51
2.4.2 Correlation between Things Governments exert on the Press and the Regression of Democracy.....	53
2.4.3 The Reality of Media Environment in the 21st Century.....	55
2.5 Review of Existing Studies: Trends and Limitations.....	57

Chapter 3. Methodology

3.1 Operational Definitions of Keywords	61
a. The Press	61
b. Government	61
3.2 Objects of Study: South Korea and Germany	62
3.3 Hypothesis and Research Questions	63
3.4 Methodology	65
3.4.1 Case Study	65
a. Pilot Case Study: Awareness of the Need for including Self-censorship Cases	65
b. Setting up Criteria for Case Selection	66
c. Conducting Case Collection	67
d. Verification of the Validity and Reliability of Case Collection	67
e. Collecting Data from Cases and Categorizing	68
f. Case Analysis (* incl. collected 40 cases)	72
3.4.2 In-depth Interview	86
a. Creating Questions and Deciding on Interviewee Groups	86
b. Seeking out Interviewees and Completing Tailored Questionnaires	86
c. Conducting Interviews	86
d. Analysis of Interview Content (* incl. list of 16 interviewees)	87

Chapter 4. Study Results I: Case Study

4.1 Government Influence's Tendencies over the Press	90
4.1.1 Main Type (Way)	90
4.1.2 Macroscopic Intention and its Attainment or not	94
4.1.3 Timings of Government Influence	97
4.1.4 Execution Results of Government Influence	101
4.1.5 Frequently Targeted Media	105
4.1.6 Executors getting involved in Government Influence	110
4.1.7 Intention Delivery Methods among Executors	117
4.2 Media Environment's Visible Response (Resistance) to Government Influence	119
4.2.1 Visibly Responding (Resisting) Subjects and the Timings	119
* South Korean Cases' Integrated Datasheet	123
* German Cases' Integrated Datasheet	143

Chapter 5. Study Results II: In-depth Interview

5.1 Perceptions of Government Influence: What do you think your government exerted on the press in the 21st century?	158
5.1.1 South Korean Interviewees' Perceptions	158
5.1.2 German Interviewees' Perceptions	159
5.1.3 Comparison of Perceptions by Interviewees from both Countries	161
5.2 Perceptions of the Media Environment: Reasons/Backgrounds of Journalists' Perceptions that Their Government exerted 'Something' on the Press	163
5.2.1 In terms of the South Korean Media Environment	163
5.2.1.1 The Government's Hold over Public Broadcasters	163
5.2.1.1.1 Public Broadcasters' Governance	163
5.2.1.1.2 Interference in Reporting and Personnel Appointments through 'Proxy Way'	164
5.2.1.1.3 Limitations of Governance reform (Reform Irony)	165

5.2.1.2 The Government's Abuse of Power	166
5.2.1.2.1 Mobilization and Abuse of Government Agencies	166
5.2.1.2.2 Surveillance on the Press by a National Intelligence Agency	168
5.2.1.2.3 Abuse of Regulation as a Means of Control	169
5.2.1.3 Journalists Collaborating on the Government's Intentions	171
5.2.1.3.1 Public Broadcasters: In-house Control and Unofficial Disciplinary Actions by Forces following the Government	171
5.2.1.3.2 Private Media: Top-level Executives scouted into the Government Serve as the Control Route	172
5.2.1.3.3 Collusive Ties between the Government and Media Companies (* Differences in the Stance among Journalists)	174
i. Admitted, a Relationship in which the Government has the Upper Hand	175
ii. Admitted, a Mutually Cooperative Relationship	176
iii. Conclusion	177
5.2.2 In terms of the German Media Environment	179
5.2.2.1 The Government's Neoliberal Market Deregulation Policy	179
5.2.2.1.1 Media Market Concentration	179
5.2.2.1.2 Pursuit of Economization by Media Conglomerates	180
5.2.2.1.3 Collusive Ties between Political and Media Powers: Neoliberal Network	182
5.2.2.2 Political Influence from the Inside/Outside over Public Broadcasters	185
5.2.2.2.1 Partisanship of the Supervisory Boards in Public Broadcasters	185
5.2.2.2.2 Close Affinity between Local Public Broadcasters and State Governments ('Staatsnah')	187
5.2.2.3 The Government's Misuse of Institutional Power (* Differences in the Stance among Journalists)	188
i. Denied, Trust in the Government	189
ii. Partly Admitted; however, Trust in Institutional Power within the System	190
iii. Admitted, Distrust in the Government	191
iv. Conclusion	191

Chapter 6. Conclusion

6.1 Overall Summary of Study Results	193
6.1.1 Case Study	193
6.1.1.1 Tendencies of the South Korean and German Governments' Influence on the Press	193
6.1.1.2 Responses of the Media Environment to the Governments' Influence	195
6.1.1.3 Summary and Comparison	195
6.1.2 In-depth Interview: Journalists' Perceptions of Their Government's Influence and the Reasons/Backgrounds in Terms of the Media Environment	197
6.1.2.1 South Korean Journalists' Perceptions	197
6.1.2.2 German Journalists' Perceptions	198
6.1.2.3 Comparison	199
6.2 Key Findings	200
6.2.1 Tendency of Government Influence I: Implications of Targeted and Non-targeted Media	200
6.2.2 Tendency of Government Influence II: Interpretation of the Period When the South Korean Government's Influence on the Press was Concentrated	201
6.2.3 Journalists' Dichotomous Thinking about Government Influence	202
6.2.4 Difference in Understanding of the Concept of the Term 'Control'	203

6.2.5 Under Government Influence, Perceptions of the Relationship between Government and the Press	205
6.3 Significance and Limitations of Results	207

Bibliography

Literature	209
Online Article and Website	223

Appendixes

Appendix 1: Typology of government control over the press: 7 categories, established by classifying press controls reported in 61 countries in 1951-1960.....	230
Appendix 2: Criteria for PICA (Press Independent and Critical Ability)	231
Appendix 3: 15 press freedom variables related to government pressures on the press	232
Appendix 4: Methodology Questions included in <i>Freedom of the Press</i> published by Freedom House ..	233
Appendix 5: 4 Muster der massenmedialen Politikvermittlung im Wahlkampf.....	241
Appendix 6: Tool for case screening (Source: Appendix 4. 'Methodology Questions' of Freedom House)	242
Appendix 7: Evidential material on six cases of South Korean self-censorship.....	244
Appendix 8: Pressekodex (German Press Code)	245
Appendix 9: Questions for in-depth interview.....	247

List of Figures

Figure 1 Keywords that have been used by the preceding researches on the topic of press control (press freedom)	24
Figure 2 Types of press control.....	30
Figure 3 Media governance as horizontal and vertical extension of government.....	41
Figure 4 Interpenetrationsmodell von Politik und Medien	47
Figure 5 Typology of government-press relationship in terms of mutual influences.....	47
Figure 6 Typology of news management and action repertoire	49
Figure 7 Schema in a comprehensive representation of ‘things governments exert on the press’	50
Figure 8 Individual influences on media content in the hierarchical model	51
Figure 9 Democracy Index by region (2006–2018).....	53
Figure 10 Comparison of the number of countries with improved and declined freedom levels	54
Figure 11 Freedom Index trend of the US	54
Figure 12 Journalists sacrificed or detained by government control	55
Figure 13 The credibility of German media (2015).....	58
Figure 14 The share of reliance/utilization on 6 major media in South Korea (2015-2017)	58
Figure 15 5 types (ways) of government influence on the press.....	70
Figure 16 Types (ways) of government influence	91
Figure 17 Macroscopic intention (reason or purpose) of government influence	95
Figure 18 Attainment of an aim or not through government influence.....	96
Figure 19 Timings of South Korean government influence and visible response by the media environment	99
Figure 20 Timings of German government influence and visible response by the media environment	100
Figure 21 Execution results of South Korean government influence	103
Figure 22 Execution results of German government influence	104
Figure 23 Targets of South Korean government influence	106
Figure 24 Targets of German government influence	108
Figure 25 Organs or performers getting involved in South Korean government influence on the press	111
Figure 26 Organs or performers getting involved in German government influence on the press	114
Figure 27 Methods of intention delivery for exerting government influence	118
Figure 28 Subjects that visibly responded (resisted) against government influence	122
Figure 29 South Korean interviewees’ perceptions of ‘something’ their government exerted on the press	159
Figure 30 German interviewees’ perceptions of ‘something’ their government exerted on the press	161
Figure 31 7 South Korean journalists’ stances on the relations between their government and the press (Comparison of influences).....	178
Figure 32 7 German journalists’ stances on their institutional power (Spectrum)	192
Figure 33 External evaluation of South Korean and German press freedom (2010-2017).....	200

Abstract

Government Influence on the Press in Democracies, Journalists' Perception of the Influence, and the Media Environment — The Cases of South Korea and Germany —

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This study started with the awareness of the problem of government influence on the press in democracies in the 21st century. In other words, to ensure that the press can freely and faithfully fulfil its role as a 'watchdog' for power as originally sought by the 21st-century democracies, it is necessary to face up to how and in what way the governments have exerted their influence on the press.

Accordingly, the study aimed to identify what and how governments in the 21st-century democracies exerted on the press, how the media environment responded to it, and what perceptions journalists have of their government's influence. To this end, as objects of the study, the researcher took two countries of the East and the West, South Korea and Germany, that are externally recognized as countries with freedom of the press due to their fairly developed democratic systems and that have different forms of government. Also, as a qualitative research method, case study and in-depth interviews were carried out sequentially.

The study identified the tendencies of the governments' influence, such as media that became the main target of government influence in South Korea and Germany. And through journalists' perceptions of their media environment, it was understood that each country's unique system such as media governance, and political or economic factors affected the tendencies of government influence. Furthermore, the study identified journalists' perceptions of their government's influence and the reasons/backgrounds for such perceptions in terms of the media environment, such as dichotomous thinking about government influence and perceptions of the relations between their government and the press.

In conclusion, this study ultimately seeks to explore measures to improve the existing media environment by identifying journalists' perceptions of their government's influence and the reasons/background for such perceptions and exposing the journalists' awareness of the problem of their media environment.

Keywords: Democracies, Government Influence on the Press, Journalists' Perception, Media Environment, South Korea, Germany

Chapter 1. Introduction

1.1 Background of the Study

The topic of this study began with the following questions (doubts). Has freedom of the press been fully protected by the government in countries where democracy is developed and mature? In this regard, how do journalists perceive their media environment in 21st-century democratic countries?

The researcher had worked as a TV reporter for a 24-hour news channel (semi-public broadcaster) in South Korea, a country based on democratic principles and systems, for 10 years (2008-2017). In this time, the researcher has directly and indirectly experienced and witnessed the conservative regimes that dominated the press and influenced it in various ways.

For instance, during the Lee Myung-bak regime (2008-2013), over 450 journalists were penalized (dismissed, suspended, faced salary reductions, warnings and standby orders) for resisting the government's unjust pressure and influence—for e.g. involvement in the selection of high-level personnel in media companies and interference in reporting (Korea National Union of Mediaworkers, 2013). In other words, the worst suppression of the press since the Chun Doo-Hwan military regime (1979-1988) which repressed and abused the media to block criticism and secure legitimacy was being carried out in 21st Century South Korea, which is considered one of the most advanced countries in Asia in terms of democratization. As a result, for almost 10 years, the level of actual press freedom as experienced by South Korean journalists has fallen short of the 'Partly Free' level announced by Freedom House at the same period of time (Pae, 2012, pp. 26-27; Lee, 2015).

It seems that this (similar) media environment is not merely limited to South Korea. That is because in the 21st century and in democratic countries, cases of infringement of press freedom have been found often. The recent events below have attracted great international attention.

In October 2018, journalist from Saudi Arabia Jamal Khashoggi visited the Saudi Arabian Consulate in Turkey to issue personal documents and was violently murdered at that time. Khashoggi was an anti-governmental journalist who was exiled from Saudi Arabia in September 2017 and lived in the United States, where he wrote columns criticizing the Saudi Crown and the royal family. The world was horrified as evidence was revealed that the brutal murder of a journalist who criticized the government was carried out under the orders of a monarch wielding absolute power. Journalists around the world who reported this event were led to look back upon the actual state of press control in their own countries. According to the 2018 World Press Freedom Index published by Reporters Without Borders, Saudi Arabia has 'Very Bad' press freedom, ranking 169th out of 180 countries.

Right after the 'Khashoggi murder' incident, another incident that infringed upon freedom of the press took place in the United States. On November 7, 2018, US President Donald Trump berated White House correspondent for CNN Jim Acosta who was asking him uncomfortable questions during a press conference, telling him, "You're a rude, terrible person" to his face and then revoking his White House pass temporarily. President Trump has routinely called reports that were unfavourable to himself or his administration 'fake news' and has tried to bring down the credibility of the press by dismissing media companies like CNN, New York Times, Washington Post and Wall Street Journal that asked aggressive questions regarding his corruption scandals. Although Acosta's ban from the White House might be interpreted as being an extension of President Trump's attitude towards the press, the fact that the authorities of the United States, the most representative of liberal democracies, took away a journalist's right to report, that is, that such blatant press control had taken place, was a great shock to many. According to the 2018 World Press Freedom Index published by Reporters Without Borders, the United States has 'Fairly Good' press freedom, ranking 45th out of 180 countries.

What the above examples show is that, regardless of the levels of press freedom, suppression of journalists and press control is taking place by the will of the government and the powerful, and 21st Century democracies are no exception. UK historian Edward Hallett Carr (1956, p. 76) said of the period following the French Revolution into the beginnings of the 20th Century, "The leaders of the new democracy are concerned no longer primarily with the reflexion of opinion, but with the moulding and manipulation of opinion". It can be said that his statement

is significant even in the 21st century.

However, the press which a democratic state should aspire to, as stated below by US third president Thomas Jefferson (1801-1809), is that which, as a necessary condition of democracy, can be encountered intactly by all citizens. In other words, this is an emphasis on a free press that is not controlled by power.

“The basis of our governments being the opinion of the people, the very first object should be to keep that right; and were it left to me to decide whether we should have a government without newspapers or newspapers without a government, I should not hesitate a moment to prefer the latter. But I should mean that every man should receive those papers and be capable of reading them.” (Jefferson, 1787)

The reality in which the government (the powerful) in a 21st-century democracy exerts excessive influence on the press or violates press freedom is so far removed from the ideals and values of democracy such that it cannot be considered ordinary. Such reality is not a matter of counting the number of occurrences but is itself a problem. At the same time, resigning oneself despite even facing such reality and events would only make the situation faced by the press worse, as if one denies reality and naively makes a positive assessment of press freedom in democracies.

Moreover, the fact that the press, whose role is to surveil the government and the powerful and keep them in check, is repressed and controlled, means that the public’s right to know, guaranteed through the press, is violated. If the public’s right to know is violated and the government or the powerful uses repression and control to circulate biased news, this would inevitably result in a distorted public opinion and democracy would face a crisis.

Therefore, in order to ensure that the press can freely and faithfully fulfil its role as 21st-century democratic countries seek originally, it is necessary to face up to how and in what way the government has exerted its influence on the press.

In summary, this study started by taking issue with the critical mind of government influence on the press in 21st-century democracies and the uncritical atmosphere (indifference) towards it and by recognizing the need to strengthen the press’s ability to keep the power in check and to freely criticize it.

1.2 Objectives of the Study

As mentioned earlier, this study topic originated in the critical mind of some discrepancy between the press that 21st-century democracies should rightly seek and the actual press we see in reality. So, the researcher intended to understand how and in what way the government in a democratic country has exerted its influence on the press and in this regard, how journalists perceive their media environment.

This is not to equate governments in democratic countries to Nazi Germany (1933-1945), a classic example of a regime that abused the media as a measure to seize and maintain the power, or North Korea, a representative existing country controlling the media under the hereditary dictatorship of three generations for over 70 years. In the light of the roles of the press in 21st-century democracies to surveil, keep in check and criticize the government (the powerful), this is based on the premise that freedom of the press should be rightly guaranteed now more than ever, and that the exertion of excessive influence on the press by the government—in other words, infringement of press freedom—should be monitored more thoroughly and evaluated with more critical and severe standards.

US journalism scholar Leonard R. Sussman (1989, pp. 190-191) stated that the quality of news and information flow is a key factor in evaluating freedom levels of a certain country, and that the quality of living is much higher in a country with press freedom than in a repressive regime. Following Sussman's argument, because the position of a state in the press freedom spectrum, in other words, its level of press freedom (intensity of infringement on press freedom) is closely related to the individual lives of its citizens, freedom of the press needs to be guaranteed. Moreover, as the press is considered a necessary condition for democracy, the press should not be arbitrarily restricted by the government in a democratic state (Commission on Freedom of the Press, 1947, 6p; Ogbondah, 1994, p. 13).

Therefore, this study focuses on government influence that affects the press's free and faithful fulfillment of its role in 21st-century democracies, and it aims to identify how and in what way the government has exerted its influence on the press, how the media environment responded to that, and how journalists perceive their media environment.

Through this, the ultimate purpose of the study is to seek measures to improve the existing media environment—namely, to enhance press freedom—by grasping government influence's tendencies and journalists' perception of their own media environment.

Chapter 2. Literature Review and Theoretical Study

2.1 The Press

2.1.1 Reason for Existence of the Press

Ancient Greek philosopher Aristotle said, “Man is by nature a social animal”. As there is nobody to deny the truth of this statement, it remains valid to the present day. Then, what are the tools and methods that help man to live as a social animal? It can be said that these tools are the press, which is a window for expression of opinion and which contributes to the formation of public opinion on particular issues by transmitting facts and information, and the various forms of media, developed to make the press possible (Council of Europe, 2011).

American journalist and writer, Walter Lippman (1998, p. 29), known as the father of 20th-century modern journalism, wrote in his book “The world that we have to deal with politically is out of reach, out of sight, out of mind. It has to be explored, reported, and imagined. Man is no Aristotelian god contemplating all existence at one glance”. It is thus the press and media, that help man make for himself a trustworthy picture inside his head of the world beyond his reach and that convey the public affairs, i.e. the world outside relating to other people and interesting to the individual. In this way, public opinion is created.

This function of the press (mass media) was first focused centering on the producer’s position; however, with the growing awareness of the user’s activeness, began to be understood from the perspective of the audience (Lasswell, 1948, pp. 37-38; Katz, 1959, pp. 2-3). In other words, there emerged the functional approach¹ that places an emphasis on how the audience wishes to use mass media. With such approach, American sociologist Charles R. Wright (1960, p. 609) classified the functions of mass media into four categories:

- Surveillance: collection and distribution of information concerning events in the environment, both outside and within any particular society. In general, this is popularly conceived as the handling of news.
- Acts of correlation: interpretation of information about the environment and prescriptions for conduct in reaction to events. Editorial function.
- Cultural transmission: communicating a group’s store of social norms, information, values, and the like, from one generation to another. Educational function (Socialization).
- Entertainment: communication intended to amuse people irrespective of any instrumental effects it might have.

With the demand for news and information following the spread of mass media and the increased interest in the public sphere, the political and educational functions of the press and especially, its role as a watchdog for power have been emphasized.

Louis W. Hodges (1986, p. 22), a US philosopher specialized in journalism ethics, emphasized the need and reason for existence of the press as the representative ‘eye’ watching government on behalf of individuals because the people are absolutely dependent on knowledge of government in order to participate in the political process but not all citizens can have individual access to the halls of government—executive, legislative, and judicial.

“It is a matter of practical necessity! Because we cannot all be there all of the time with our own eyes, ears, and tongue, we require that someone else be there. We “send” journalists to watch government on our behalf. Journalists thus become a vital practical link in the chain of communications.” (Hodges, 1986, p. 22)

To facilitate this function, the press is protected through the constitution and is occasionally granted the “fourth estate” by the courts (Hindman, 1997, p. 3). In addition, freedom of the press is being valued (Hindman, 1997, p. 10; Psychogiopoulou, 2014, p. 1).

The above-mentioned functions and value of the press are also valid in the 21st century, and several more have been added.

¹ It refers to ‘the theory of uses and gratification’ (Katz, 1959, pp. 2-3).

Along with the role of a conduit for information, the press influences the political process by selecting and presenting issues and creates the public sphere to evaluate or judge the importance of policies in the aspects of both rationality and sensibility (Schneider, 1998, p. 423).

Furthermore, the functions and reality of the press supply a democratization index. US journalism scholar Ralph L. Lowenstein (1967, pp. 15-23) has already stressed that it is possible to predict important changes in society by looking into the press in a single nation—regardless of both free and authoritarian systems—and especially “the press (press freedom) is a relatively accurate indicator of democracy”. In the 21st century, Committee to Protect Journalists (n.d., “Frequently Asked Questions: Why is press freedom important?”) stipulates that in terms of freedom of expression, a solid press freedom environment promotes the growth of a robust civil society, which leads to stable, sustainable democracies and healthy social, political, and economic development. In the same vein, international organizations such as Freedom House and Reporters Without Borders have been publishing the Press Freedom Status or Index of each country around the world every year.

The press, as a social institution that creates its own structure to perform these functions, formulate its own goals independently; however, generally they can be achieved only if they do not run counter to core objectives of society (Jarren, & Meier, 2002, p. 102). This is because the press interacts with social and political structures and relies heavily on technical, economic and social basic conditions (Schneider, 1998, p. 422). Thus, there is still a lot of discussion about the social functions and reason for existence of the press (Franklin et al., 2005, p. 124).

So what is the substance of what we commonly call ‘the press’ and specifically what do it refers to? The concept of the press is described in detail in the next chapter.

2.1.2 Concept of ‘the Press’

The term ‘Press’ is quite abstract and in fact ambiguous. Especially with the advent of new media following the development of media technology, uncertainty (evolution) in the concept of the press continues, and this reality sometimes leads to consumptive debates in a society (Park, 2015). Nevertheless, because of the needs of protection and regulation of the press in accordance with its social function and role importance, interpretation and definition efforts on the concept of the press are more active in law (legal circles) than in journalism.

From a global perspective, US scholars has taken the First Amendment as a starting point for understanding the concept of the press, which includes the term ‘the press’ and concurrently is the world’s first constitutional statement to specify ‘press freedom’ that is widely spoken (Abrams, 1978; Jones, 2014).

“Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.” (The First Amendment to the United States Constitution, ratified on December 15, 1791)

The press clause of the Amendment explicitly and purposely provides protection for the press that is independent, and the essential characteristic of the press requiring constitutional protection is its autonomy from government (Abrams, 1978, p. 564). US constitutional scholar Sonja R. West highlighted some reasons to protect the press: gathering information, acting as a surrogate for and a conduit of news to the public, and serving as a check on government and the powerful. Nearly all of those are rooted in specific and valuable tasks of the press. Like this, the purpose of specially protecting the press with the constitution can be seen as a way of allowing the press to fulfil what the constitution pursues (Jones, 2014, pp. 365-366).

However, although we can derive the characteristics of the press such as autonomy, social roles and values from the Amendment, the answer to ‘what is the press’ is not available. In this regard, US expert on constitutional law Floyd Abrams (1978, pp. 580-582) said that the difficulty in providing a totally satisfying definition should not deter us from affording protection to those who are plainly entitled to it. So, based on legal cases, he presented three approaches to defining the press in terms of providing protection: to afford press protection on a par with regularly employed journalists to all who write; to protect not only journalists on established newspapers but also someone who disseminate information to the public through various media or owns corresponding information; to provide protection only to the institutional press as an entity.

The constitution of South Korea, which is the origin of the research topic, also specifies ‘the press’ and ‘freedom of the press’, where the concept of the press can be grasped more specifically.

- “(1) All citizens shall enjoy freedom of speech and the press, and freedom of assembly and association.
- (2) Licensing or censorship of speech and the press, and licensing of assembly and association shall not be recognized.
- (3) The standards of news service and broadcast facilities and matters necessary to ensure the functions of newspapers shall be determined by Act.
- (4) Neither speech nor the press shall violate the honor or rights of other persons nor undermine public morals or social ethics. Should speech or the press violate the honor or rights of other persons, claims may be made for the damage resulting therefrom.” (Article 21, Constitution of the Republic of Korea, wholly amended on October 29, 1987)

South Korean scholars interpret the press specified in the constitution as an act of human communication in macroscopic aspect, and conceptualize it as ‘speech’ and ‘expression’. Furthermore, some constitutional scholars view the press as expressing and conveying individual opinions, collecting and receiving information necessary for the formation of opinions, and reporting and disseminating objective facts, without distinction from publication. In other words, they do not simply see the press as a medium of information delivery, but ultimately understand it as an act of expression itself (Yang, & Kim, 2011, p. 60). Also one criticizes mass media-oriented perception bias, fearing exclusion of freedom of personal act of expression that occurs when the press is generalized into newspapers and broadcasting, etc. (Park, 2004, p. 76).

Based on the summarized content above—concepts of ‘the press’ in the South Korean and US constitutions—it is impossible to unify the concept of ‘the press’. However, at least it can be defined what the word ‘the press’ is interpreted as or in what sense it is commonly used. Broadly, it is defined as the press as an act itself of collecting and disseminating information or facts, as a means or medium of an act of expression, as an actor who performs such actions, and as an agency that mainly does such actions and is responsible for them. In other words, an act of expression called as the press is expanded to press reporting (journalism), press media, journalists and press companies (media outlets), with specific meanings.

Meanwhile, unlike the mass media era in the 20th century, as a window for news and information are diversifying due to the development of media technology, the concept of the press is evolving by embracing new media such as social media. Some scholars continue to raise the need for broadening and reinterpreting the concept of the press, pointing out the problem that press-related laws still limit the category of the press to traditional media (mass media) and add new media to subjects of the law’s application according to the need for regulation (Park, 2015).

2.1.2.1 The Press as an Act itself: Journalism

British communication theorist Dennis McQuail defined journalism as follows:

“This(Journalism) refers to the product or the work of professional ‘news people’. As product it typically means informational reports of recent or current events of interest to the public. In this sense, journalism is another word for ‘news’. ... As a work process, journalism has mixed connotations, reflecting uncertainty about the status of the profession.” (McQuail, 2010, p. 561)

Even though there are many other normative definitions of journalism, when focusing on the fact that journalism provides news and information that the public needs, UK sociologist Brian McNair’s description of journalism is useful: “revealed truth, mediated reality, an account of the existing, real world as appropriated by the journalist and processed in accordance with the particular requirements of the journalistic medium through which it will be disseminated to some section of the public.” (McNair, 1998, p. 9)

As such, journalism has been practiced by its actors (professional journalists) but recently, in the process of journalism, active audiences filter messages based on their own experiences and understandings and therefore people are increasingly contributing to journalism directly via social media and user-generated content (Harcup, 2015, p. 5). A variety of social actors—from policymakers to industry representatives to ordinary citizens—are involved in how journalism is constituted and performed (Vos, 2018, p. 1).

Thus the notion of journalism has expanded. And furthermore, journalism entails discovering and uncovering fresh, factual, topical materials and making it publicly available, and plus it goes beyond that to include amplifying, contextualizing or commenting on facts and comments that have already been made public (Harcup, 2014, p. 148).

2.1.2.2 The Press as a Means of an Act of Journalism: Media

In general, when people mention media, they frequently refer to mass media, which are impersonal—in other words, institutionalized—means of mass communication that transmit messages to audiences (Franklin et al., 2005, p 143). The mass media includes, for example—now called ‘Old Media’—radio, television, newspapers and magazines and so on.

However, developments in information and communication technologies and their application to mass communication have led to significant changes in the media ecosystem, and the term media has started to be understood in a broader sense. Accordingly, the Council of Europe (2011) adopted a new and broad notion of media as follows:

“Media which encompasses all actors involved in the production and dissemination, to potentially large numbers of people, of content (for example information, analysis, comment, opinion, education, culture, art

and entertainment in text, audio, visual, audiovisual or other form) and applications which are designed to facilitate interactive mass communication (for example social networks) or other content-based large-scale interactive experiences (for example online games), while retaining (in all these cases) editorial control or oversight of the contents” (Council of Europe, 2011)

This expansion of the media concept can also be seen in changes in relevant statutes.

At nation level, the broadcasting commission (Rundfunkkommission der Länder, 2019, p. 6; Chang, 2019, p. 64) of Germany that is a target country of the study expanded and redefined the concept of broadcasting to reflect the digitalization of media². Accordingly, the Rundfunkstaatsvertrag, which has been the basis for the review and handling of viewers’ complaints about broadcast reporting, was replaced by the Medienstaatsvertrag. Hereby, the application range of the Medienstaatsvertrag has gone far beyond the broadcasting sector and includes media platforms (e.g. Magenta TV), user interfaces, media intermediaries (e.g. search engines), and video-sharing services (e.g. YouTube) and so on (Niedersachsen, 2020).

The German Press Council (Deutscher Presserat), which is in charge of deliberating complaints and remedying damages on print media and publications, defined a object for the performance of its task pursuant to article 9 clause 2 of the articles of association, that is, the press as “*einzelne Zeitungen, Zeitschriften oder Pressedienste und journalistisch-redaktionelle Telemedien der Presse sowie sonstige Telemedien mit journalistisch-redaktionellen Inhalten außerhalb des Rundfunks*”. The Press Council has already included “internet press (die elektronische Presse)” in the press concept through a revision of its articles of association in November 2008³ (Deutscher Presserat, 2015, pp. 2, 5; Lee, 2018, p. 66).

The Korean Press Arbitration Commission, which plays the same role as the German Press Council, defines the media as “any broadcasting, newspaper, periodical including any magazine, news communications or online newspaper” based on article 2 clause 1 of the Act on Press Arbitration.

In the dimension of empirical research, Freedom House, an international research institute that annually announces the degrees of worldwide press freedom, defined 21-century media in a more substantive concept as follows:

“‘Media’ refers to all relevant sources of news and commentary—including formal print, broadcast, and online news outlets, as well as social media and communication applications when they are used to gather or disseminate news and commentary for the general public.” (Freedom House, Freedom and the Media 2019 Methodology)

In conclusion, the current trends regard not only legacy media such as newspapers, TV, and radio, but also various new media such as internet media with press characteristics and social media that report (collect and disseminate) content edited in news formats as media.

British communications scholar Dennis McQuail (2010, p. 166) emphasized the independence of media so as to be free from control by government or other powerful interests, and also said that diversity in the media—plurality of ownership, diversity of channels and forms, and diversity of information, opinion and cultural content—is

² Medienstaatsvertrag

§ 2 Begriffsbestimmungen

(1) Rundfunk ist ein linearer Informations- und Kommunikationsdienst; er ist die für die Allgemeinheit und zum zeitgleichen Empfang bestimmte Veranstaltung und Verbreitung von *journalistisch-redaktionell gestalteten* Angeboten in Bewegtbild oder Ton entlang eines Sendepfades ~~unter Benutzung elektromagnetischer Schwingungen~~ mittels Telekommunikation.

Im April 2020 haben die Regierungschefinnen und Regierungschefs der Länder den Medienstaatsvertrag unterzeichnet.

³ Satzung und Geschäftsordnung des Deutschen Presserats

§ 1 – Name und Zweck des Vereins

(1) Der „Trägerverein des Deutschen Presserats“ ist ein Zusammenschluss der in § 2 genannten Organisationen und Personen mit dem Zweck, für die Pressefreiheit in der Bundesrepublik Deutschland einzutreten und das Ansehen der deutschen Presse—*Presse im Sinne dieser Satzung ist auch die elektronische Presse*—zu wahren. Zur Wahrnehmung dieser Aufgabe bildet der Verein das Gremium „Deutscher Presserat“ gemäß § 7 dieser Satzung.

desirable to promote wider democratic participation by the public. Although the diversity has been dampened by media centralization and commercialization through neo-liberal market operations (Terzis, 2007, pp. 446-447; MEDIADEM, 2010, pp. 221-223), it can be said that the problem has been overcome somewhat with the advent of new media (social media such as SNS) and alternative media.

2.1.2.3 The Press as an Actor who Performs Journalism: Journalists

With the advent of new forms of media in the digital age, the scope of media actors has also enlarged (Council of Europe, 2014; Clark, & Grech, 2017, p. 24).

From an international perspective, journalists in Europe in the early 2000s were defined as “any natural or legal person who is regularly or professionally engaged in the collection and dissemination of information to the public via any means of mass communication” (Council of Europe, 2000). Since then, the European Parliament (2018) stressed that “the scope of such a role should be enlarged to encompass online and citizen journalism, as well as the work of bloggers⁴, internet users, social media activists” in order to strengthen the role of the press that acts as public watchdogs in a democratic society and helps to inform and empower citizens.

The United Nations early identified that journalism was being carried out by a wide range of actors.

“Journalism is a function shared by a wide range of actors, including professional full-time reporters and analysts, as well as bloggers and others who engage in forms of self-publication in print, on the internet or elsewhere.” (UN Human Rights Committee, 2011, p. 11)

In terms of press freedom, the Committee to Protect Journalists, an international organization for defending journalist human rights, more specifically defined journalist as:

“CPJ defines journalists as people who cover news or comment on public affairs through any media—including in print, in photographs, on radio, on television, and online. We take up cases involving staff journalists, freelancers, stringers, bloggers, and citizen journalists.” (Committee to Protect Journalists, n.d., “Methodology of CPJ’s annual census”)

Until the early 2000s, there were debates over whether blogging was journalism as well as raising questions of credibility on blogs’ information (Hermida, 2009, p. 269). Freedom House has specifically added “bloggers” as one of the indices for checking the degrees of press freedom since 2011 and has also been monitoring the oppression against bloggers as with journalists (Schneider, 2014, p. 14).

In conclusion, changes in the media ecosystem, namely the enlargement of the media (emergence of new media) led to the expansion of the concept of journalists. Although they do not obviously belong to media companies and organizations, such as bloggers and citizen journalists (freelancer), those who provide journalistic-edited content or information with the public are being perceived as de facto “semi-journalists” and are also socially accepted.

On the one hand, this expanded scope of journalists arose from the awareness of entry onto the scene of new kinds of media actors such as bloggers, citizen journalists and others who create user-generated content (Council of Europe, 2011, Clark, & Grech, 2017, p. 24) and the needs to protect them amid circumstances in which freedom of the press is threatened day by day (Council of Europe, 2014). In addition, the ultimate goals were, by protecting the free and unhindered exercise of journalism, to secure adequate means of promoting the development of free, independent and pluralist media and to safeguard the individual freedom of expression and the right of the public to be informed on matters of public concern, which are the essential foundations of a democratic society (Council of Europe, 2000; 2014).

⁴ The Council of Europe (2011) stipulated that bloggers have already been accepted as part of online journalism actors; however, they should be considered media (journalists) only when they fulfil codes of conduct or ethical standards to a sufficient degree. (See clause No. 41 on the website.)

URL: https://search.coe.int/cm/pages/result_details.aspx?objectid=09000016805cc2c0

2.1.2.4 The Press as an Agency that Conducts Journalism: Media Companies

As with journalist, media company as another journalistic actor means a person or entity that produces content such as news and information, uses it to compose a program geared to a target group, and engages in disseminating it to the general public through a medium of mass communication such as newspaper, radio, television and magazine (Hess, 2014, p. 4; United States Senate, 2014, p. 611). In short, media companies are characterized as businesses with the purpose to provide content using media (Hess, 2014, p. 4). And they are divided into state-owned, public (not-for-profit corporation) and private (sole proprietorship/partnership/incorporation) media companies according to purposes of establishment and governance, and varying types of media operations affect the forms and structures of media firms (Picard, 2011, pp. 1-3).

In most countries, journalism is produced by commercial media organizations that employ journalists (Harcup, 2014, p. 149). Such media companies are organizationally bound enterprises with routinized practices for production of news within their organization in an environment of varying factors and forces, and have concurrently both autonomy and constraint factors (Lowrey, 2018, p. 127).

In particular, aiming for organizational functions, each media company has its own procedures—news selection and production shaped by taken-for-contained rules and conventions—that is, routines. So, journalists belonging to the media company follow patterned, routinized, repeated practices and forms to do their jobs (Shoemaker, & Reese, 1996, p. 105).

Routines within media companies buffer the organization from disruptive environments and reduce uncertainty in decision-making (Baum, 1996, p. 100; Lowrey, 2018, p. 130), whereas they produce strong inertial pressures against change and can become a set of constraints on individual journalists (Baum, 1996, p. 100; Shoemaker, & Reese, 1996, p. 105).

In summary, media companies are professional organizations with routines to carry out journalism and they standardize journalists' journalistic behavior—with putting media workers in frames for purposes. As a result, media companies themselves are likely to influence journalists' actions and journalistic outcomes.

Meanwhile, in recent years, with a meso-level institutional approach, the behaviors of journalists' practicing journalism while maintaining some degree of independence and autonomy within the collective field that was negotiated are emerging. These are understood as attempts to accommodate even agency as well as autonomy and constraint in news production. However, even in such a space, journalists and their organizations are still influenced by external factors and forces and they should seek accord with other dominant institutions of a society (Lowrey, 2018, pp. 127, 135).

Furthermore, facing an era of open and flexible digital networks⁵, the scope of the concept of media company is also expanding (Lowrey, 2018, pp. 136, 142). For example, through the combination of (user-generated/producer-generated) content providers and platform operators like YouTube or news portals, the number of entities providing news content and acting as media outlets is increasing (Hess, 2014, p. 5). Reflecting these changes, German economist Thomas Hess (2014, p. 6) redefined today's media companies as “organizers of public, media-based communication which operate as content providers, as platform operators, or in hybrid forms.”

⁵ US media economics scholar Robert G. Picard (2011, p. 3) pointed to five decisive trends that alter the media environment and force media companies to change their thinking and operations: media abundance, audience fragmentation and polarization, product portfolio development, the eroding strength of media companies, and an overall power shift in the communications process.

2.1.3 Social Roles of the Press, and the Consequent Friction with the Government

Unique social roles played by the sub-concepts of the press are generally cited as agenda-setter (or gatekeeper), public sphere and watchdog (Yee, 2014, pp. 135-137). Along with the trend of the times, each role exhibits qualitative and quantitative changes.

US political scientist Bernard C. Cohen (1963) said that the press is not just a purveyor of information and opinion but significantly more than that. He argued that the press presents the audience what to be concerned about and asks those to pay attention to certain events and issues and in particular, matters not covered by the press are not visible in the reality. He emphasized the press's role as an agenda-setter early on.

“Generally the external world, the world of foreign policy, reaches us—or those of us who are interested and attentive—via the media of mass communication, and most importantly via the press. For most of the foreign policy audience, the really effective political map of the world—that is to say, their operational map of the world—is drawn by the reporter and the editor, not by the cartographer. And if we do not see a story in the newspapers (or catch it on radio or television), it effectively has not happened so far as we are concerned.” (Cohen, 1963, p. 13)

The notion of the press's agenda-setting role was later officially established in 1972 by two American journalist-turned academics, Maxwell E. McCombs and Donald L. Shaw (1972). The two men established the hypothesis ‘the news media has a major influence on which issues the public considers important’ so that they researched the role of mass media in the 1968 US presidential election. They were able to empirically confirm that the audience evaluates the importance of news based on how frequently and how prominently a particular piece of news is reported, so they concluded that the news media create public opinion.

The press, as the agenda-setter, becomes a decision-maker in terms of what to tell the public and what not to tell them. As a result, the press has a significant impact on the public's awareness of social issues, in particular government policies and other major matters. Therefore, if there is any pressure or control—or biased coverage by the partisan media—laid upon the process by which the press sets the agenda, the inherent independence of its role is compromised, resulting in bias and distortion, which in turn can lead to division (discontent) of the public and social confusion.

In addition, due to the development of multi- and digital media in the 21st century, there is a striking tendency among news users to consume news—a lot of soft news for amusement—according to their own preference while ignoring the agenda-setting by established media (i.e., meaningful issues reported by the media) (Choi, 2011, p. 147-149). In this sense, the position of the press as an agenda-setter is somewhat narrower than in the past.

British media historian James Curran (2002) explained the press's role as the public sphere, based on the theory laid down by German political philosopher Jürgen Habermas, as below. According to his explanation, its role is like that of a democratic agency, required for the realization of democracy.

“This conceives the public sphere as a ‘space’ where access to information affecting the public good is widely available, where discussion is free of domination and where all those participating in public debate do so on an equal basis. Within this public sphere, people collectively determine through rational argument the way in which they wish to see society develop, and this shapes in turn government policy. The media facilitate this process by providing an arena of public debate, and by reconstituting private citizens as a public body in the form of public opinion.” (Curran, 2002, p. 233)

Curran (2002, p. 233) elucidated that the press as the public sphere acts as a window by which diverse social groups can inform others of their concerns, which provides the opportunity for these groups to organize themselves, explore specific interests, clarify goals and gain support for their pursuits. In this way, the policy proposals of social groups are conveyed to a larger public.

In the 21st century, it is the trend that the public sphere does not stay in old media any longer and is moving into new media free from government constraint (Shirky, 2011, p. 30) and further is enlarging into mobile media as

well as social media such as SNS (Singh, A., & Thakur, 2013, p. 38). The representative examples of this are democratization discussions and social movements around the world, including the Iranian Green Movement⁶ in 2009 and the Arab Spring⁷ in 2010, which were triggered by mobile media.

On the other hand, German sociologist Jürgen Gerhards and communications scholar Mike S. Schäfer (2010, pp. 154-155) argued that the spatial expansion of media scope such as internet has been expected to induce a shift towards ideal participation by the audience but that still fell short of expectations as compared to the days of print media. They pointed to the gatekeeping (algorithm) of internet search-engines as one of the reasons.

“Public debate in the internet, as long as it is organized by search engines, advantages established actors, while making it more difficult for smaller actors and their arguments to appear in a relevant manner. One main reason is certainly the modes of selection that search engines apply.” (Gerhards, & Schäfer, 2010, p. 156)

In terms of technological aspect, search results or rankings are less relevant because these are based on statistical procedures rather than semantic ones, and also these are prone to external manipulation through varied manipulation skills (Machill, Beiler, & Zenker, 2008, p. 600). Therefore, the public sphere online has limitations.

Meanwhile, paradoxically, in authoritarian countries such as China, where both offline and online public spheres are under government surveillance and control, small and potentially illegal offline publications as well as ‘counter-public’ media such as blogs, discussion boards and emails become an important place for communication (Gerhards, & Schäfer, 2010, p. 156).

US political scientist W. Lance Bennett and journalist William Serrin (2005) asked themselves what the appropriate role of the press in a democracy should be and concluded that the most important and inviolable among its various roles was that of being a watchdog. They defined the role of the press as a watchdog:

“Watchdog journalism is defined here as: independent scrutiny by the press of the activities of government, business, and other public institutions, with an aim toward documenting, questioning, and investigating those activities, in order to provide publics and officials with timely information on issues of public concern.” (Bennett, & Serrin, 2005, p. 169)

The watchdog press scrutinizes and exposes the unpublicized or hidden actions by public and private agencies. Examples of this include tracking down and reporting on social ills, public official and institutional corruptions. Thereby, this could lead to public awareness of the seriousness of issues that may affect public opinion and everyday life.

Bennett and Serrin (2005, pp. 169-170), however, added that journalists often miss the timing of exposure (early warning) required to correct a problem, for which this later could develop into a greater scandal involving large social costs. Furthermore, they pointed out that despite the importance of the press’s role as a watchdog, it is the least stable and systemized aspect of journalists’ daily tasks.

In the context of such incomplete role, if there are further pressures or controls that hinder the independence of the press, the press ceases to act a watchdog for democracy and becomes a guard dog, not for the society at large, but for the privileged class with power and influence; it ceases to criticize the powerful and becomes a lapdog that follows and obeys him or her; or it becomes a sleeping dog that shirks important issues and incidents (Donohue, Tichenor & Olien, 1995).

The 21st-century role of the press as a watchdog is considerably criticized. It is pointed out that the watchdog role covers not only political power but also economic power, that is, bad practices and corruptions of enterprises

⁶ The Iranian Green Movement refers to a political movement which was led by citizens against the results of the highly controversial 2009 Iranian presidential election.

⁷ The Arab Spring refers to a series of anti-government protests, uprisings that spread across much of the Arab world in the early 2010s.

(Bennett, & Serrin, 2005, pp. 169-170) but media companies are neglecting their role in consideration of their own profits amid ever-increasing competition. According to US political scientist Diane E. Johnson (2014, pp. 376-377), media conglomerates' owners maintain close relationships with the government and other business owners (advertisers) and are concerned about alienating them, which is what threatens the role of watchdog. In the end, media outlets tend to report cautiously—passively or tone criticism down—on matters affecting their life and death.

As mentioned above, the unique social roles of the press—agenda-setter, public sphere, watchdog—are changing along with the flow of the times; nevertheless, these roles are irreplaceable by any other means. Therefore, each role itself is the reason why the press exists. In addition, since the press criticizes and puts pressure on the government through setting agendas and forming public opinion (public sphere), and holds in check and monitors the power while acting as a watchdog, conflicts with the government (the powerful) in many aspects are inevitable.

Meanwhile, the roles that the government expects from the media covering and reporting a particular event are—in summary, understanding, cooperation, restraint, loyalty (Perl, 2003, pp. 145-146; Fourie, 2008, p. 456-458):

- The government hopes that the media's coverage advances their agenda instead of other groups' agenda and claim;
- The government wants to use the media as a tool;
- The government hopes that the media refrains from contributing to public pressure on them;
- The government hopes that the media will not report/expose the details of government strategies;
- The government hopes that the image of government bodies and agencies is built positively. So, it intentionally tries to intentionally leak selected information to the media so that these agencies can be portrayed in a positive light;
- The government thinks that journalists should inform the government of core facts or related information;
- The government hopes that in some cases, the media will help them by omitting certain facts.

In this way, there is a gap between the roles conducted by the press and the press's role desired by the government. Therefore, the press and the government frequently clash with each other, and consequentially, there are constant frictions between the two, inevitably resulting in a conflictual relationship.

2.2 Government

2.2.1 Concept of 'Government'

2.2.1.1 Government Distinguished from the State

To define the concept of government, it starts with the concept of state. The representative person who laid the foundation for the birth and establishment of a modern state is British political philosopher Thomas Hobbes, and his book *Leviathan* explains the need for the state through the theory of social contract.

“Hereby it is manifest that during the time men live without a common power to keep them all in awe, they are in that condition which is called war; and such a war as is of every man against every man.” (Hobbes, 1651).

Hobbes assumed that before making a social contract, the pure state of nature without a state is ‘a war of all against all’—a state in which there is no order, in which violence and barbarism by selfish human beings is rampant. And he argued that in order for natural human beings, who have lived according to their own nature, to ensure safety and peace, they make a social contract to delegate their rights, resulting in strong state power (common power as mentioned above).

According to Hobbes’s social contract theory, the people are the main body of state formation and the source of the legitimacy of state power. However, once a state is established, the people have only the status as subjects subordinate to state power. In the theory of state from British political philosophers George Lawson and John Locke⁸, who criticized Hobbes’s theory, the people are a holder of the last political power in an emergency. Right before the French Revolution in 1789, French politician Emmanuel Joseph Sieyès⁹ argued that the people should be granted status as the main body of constituent power (*pouvoir constituant*) and a direct actor in the formation of a state.

In this way, through the process of enacting a constitution and establishing a government by the people, a state consisting of three elements of people, territory, and state power is formed. Here the people and territory form the substantive foundation of the state, and state power implies that the state must have a governing body to maintain domestic order and have the ability to independently enact domestic laws. In other words, state power is a government in that it means that there must be a central government exercising effective control over its territory (Chon, 2014, p. 289).

In 1931, with regard to the emancipation of Iraq, the Permanent Mandates Commission of the League of Nations adopted a list of conditions which had to be satisfied before a mandated territory could be considered to have achieved a position in which it could be released from the mandatory regime and recognized as a state (Raič, 2002, pp. 62-63). The conditions which were mentioned by the Commission were (Permanent Mandates Commission, 1931, p. 2):

- a settled government and an administration capable of maintaining the regular operation of essential government services;
- capacity to maintain its territorial integrity and political independence;
- capacity to maintain the public peace throughout the whole territory;
- availability of adequate financial resources to provide regularly for normal government requirements;
- possession of laws and a judicial organization which will afford equal and regular justice to all.

And the traditional state concept that is still valid is based on the four elements specified in Article 1 of the 1933 Montevideo Convention (League of Nations, 1933) that established the standard definition of a state under customary international law: a permanent population, a defined territory, government, and capacity to enter into

⁸ Lawson, G. (1660). *Politica Sacra et Civilis*.

Locke, J. (1689). *Two Treatises of Government*.

⁹ Sieyès, E. J. (1789). *Qu'est-ce que le Tiers-État?*. (What is the Third Estate?)

relations with the other states (Grant, 1999, p. 403; Murphy, 1999, p. 546).

In conclusion, not a crowd assembled by individuals, but the people gathered for the purpose of forming a community form a government and establish a state by enacting a constitution. Thus, while the two concepts, state and government, are closely related, a government is distinguished from a state as a precondition and a necessary condition for establishing a state. On the other hand, sometimes a government is understood as a comprehensive concept that includes the legislature, the judiciary and the administration, as well as local governments (local autonomous entities), and so it is regarded as the subject of public authority, that is, a state in a narrow sense (Chon, 2014, pp. 275, 302).

2.2.1.2 Government's Sub-division and Scope

Governments can be classified in any number of ways and are commonly classified by the number of rulers: government by one (as in a monarchy or a tyranny), government by the few (in an aristocracy or oligarchy) and government by the many (as in a democracy). This study focuses on the governments in democratic countries as one of the keywords is 'democracies'.

In addition, the term 'government' is often used in everyday life as well as the international community but nonetheless, it is difficult to prescribe a single version (McLean, 2003, pp. 173-174). That is because the specific meaning changes according to the point of view of the person talking about it, or the purpose and circumstance (context) of discourse, especially, applicable laws (Rim, 2015, p. 399). In other words, 'government' in modern society is used in various meanings. Therefore, to define the concept of government, the researcher separates and understands it the concept at international and domestic levels, thereby clarifying what the 'government' covered in this study is and distinguishing its scope.

2.2.1.2.1 Government at an International Level

First, on an international level, a government is entrusted with the legitimate authority for a state and thereby is a representative organ of a sovereign state with a legal personality under international law that speaks and acts in the international community on behalf of the substantial state (Wallace-Bruce, 2000, p. 57; Rim, 2015, pp. 397, 402). In 1923 during the days of the League of Nations, the Permanent Court of International Justice (1923) mentioned in dealing with the case relating to German settlers in the territory ceded by Germany to Poland: "The Members of the Council (of the League of Nations) are by the terms of the Covenant the representatives of the States by which they are appointed. States can act only by and through their agents and representatives." This is the basic principle of 'State Representation' in international law, which means that the government speaks for the state and acts on its behalf in the international community. This principle is manifest in normal state practice in which the government concludes agreements on behalf of the state and represents the state in international fora (Doswald-Beck, 1985, p. 190).

Despite the need for the existence of a government so as to attain statehood, however, international law does not prescribe the exact form of government except that it must be in conformity with the right of self-determination of peoples. Instead, it emphasizes effective control within the territory of the state by the government that is a political entity/actor (Rim, 2015, p. 397). According to the traditional law of statehood, there are two dimensions for the criterion judging 'government'. First, there should be an institutionalized political, administrative and executive organizational machinery for the purpose of regulating the relations in the community and charged with the task of upholding the rules. Second, there should be an 'effective government' in which the institutionalized political, administrative and executive organizational machinery must actually exercise state authority over the claimed territory and the people residing in that territory. In short, under international law, a government means an entity or organ that can practically establish and maintain a legal order throughout the territory of a prospective state (Raić, 2002, p. 62).

Meanwhile, a federation (federal state), which operates federalism by the power structure of state, has a federal (central) government and multiple state governments (in separate states). Under the 'principle of the unity of the state' in international law, the acts of all state organs are aggregated and regarded as acts of the state—i.e., 'attribution of conduct to a state'—for the purposes of international responsibility (International Law Commission,

2001, p. 40). For this reason, a subject exercising sovereign authority is generally unified into the federal government (Rim, 2015, p. 406; Yang, 2017, pp. 2, 44). In this context, Article 32 of the Basic Law for the Federal Republic of Germany states that the federal government is basically in charge of diplomatic affairs and matters¹⁰.

In summary of the concept of government under international law, a government is a legal and political entity that exercises effective control in the territory, and (although the entity may disappear temporarily) only one government exists de jure that has the authority to represent the state in the international community (Talmon, 1998, p. 105). Such a government represents a sovereign state with a legal personality and refers to the entire state organ including the executive (McLean, 2003, p. 173; Rim, 2015, p. 406).

2.2.1.2.2 Government at a Domestic Level

Second, on a domestic level, **(a) a government in a narrow sense** means only the executive as an entity fragmented by the separation of powers in constitutional law; **(b) a government in a broad sense** refers to the collective name for all state organs with governmental authority belonging to a central government and local governments¹¹ (McLean, 2003, p. 173; Hague, & Harrop, 2004, pp. 4-5; Crawford, 2007, p. 56).

(a) serves to perform basic functions of the state and to protect core values of the community by domestically providing public goods and services, governing administration, ensuring national security and maintaining law and order (Rim, 2015, p. 397). This is a common concept of government in news articles dealing with domestic issues—which has been used in combination with the name of the Head of the central executive, such as Moon Jae-in government, Merkel government, and Trump administration¹². In this regard, the term ‘administration’ is commonly used in the United States.

The executive in South Korea, an object of the study and unitary country with a presidential system, is the main body that exercises administrative power based on laws and regulations under the president’s direction, that is, an organ in charge of administrative affairs (Korea Ministry of Government Legislation, 1987). According to the Constitution of the Republic of Korea, the government consists of the President as the Head of executive power (article 66 clause 4), the Prime Minister who directs the Executive Ministries under order of the President (art. 86 cl. 2), the Members (Ministers) of the State Council who deliberates on important policies that fall within the power of the Executive (art. 87 cl. 2, art. 88 cl. 2), the Executive Ministries (central administrative organs of the State) (art. 94), and the Board of Audit and Inspection under direct presidential control (art. 97).

The executive in Germany, another object of the study and federal country with a parliamentary system, is the federal government (Bundesregierung), which consists of the Federal Chancellor as the Head of the federal government and the Members (Federal Ministers) of the Cabinet that is the chief consensus body in charge of administrative authority according to Article 62 of the Basic Law for the Federal Republic of Germany.

¹⁰ Grundgesetz für die Bundesrepublik Deutschland, Art 32

(1) Die Pflege der Beziehungen zu auswärtigen Staaten ist Sache des Bundes.

(2) Vor dem Abschlusse eines Vertrages, der die besonderen Verhältnisse eines Landes berührt, ist das Land rechtzeitig zu hören.

(3) Soweit die Länder für die Gesetzgebung zuständig sind, können sie mit Zustimmung der Bundesregierung mit auswärtigen Staaten Verträge abschließen.

¹¹ Local governments mean local autonomous entity’s governments in the case of a unitary country or constituent state’s governments in a federal country. These local autonomous entities and constituent states may have a legal personality aside from the country under domestic law (Yang, 2017, p. 43).

¹² For example, corresponding online articles

• Kyunghyang Shinmun. (2019, Aug. 7). The Moon Jae-in Government in a Tight Spot.

URL: https://english.khan.co.kr/khan_art_view.html?code=710100&artid=201908071741287&medid=enkh

• Bloomberg. (2020, Mar. 21). Merkel Government Assembling Package to Counter Virus Impact.

URL: <https://www.bloomberg.com/news/articles/2020-03-21/merkel-s-government-assembling-package-to-counter-virus-impact>

• Welt. (2019, Dec. 12.). Kritik an Nord Stream 2: Die Merkel-Regierung bekommt nun ihre berechnete Quittung.

URL: <https://www.welt.de/debatte/kommentare/article204268988/Kritik-an-Nord-Stream-2-Die-Merkel-Regierung-bekommt-nun-ihre-berechnete-Quittung.html>

• National Public Radio. (2020, Jul. 22). Trump Administration Is Considering Ban On TikTok In The U.S.

URL: <https://www.npr.org/2020/07/22/894343562/trump-administration-is-considering-ban-on-tiktok-in-the-u-s?t=1595592004319>

Meanwhile, according to the Principle of Federal State (Bundesstaatsprinzip) in the German Basic Law, both the federation (Bund) and constituent states (Gliederstaaten) are granted statehood and as a federal State, Germany is made up of 17 States: 16 federal states (Bundesländer) and the Federal Republic of Germany (BR Deutschland) itself (Henneke, 2000, pp. 67, 95; Katz, 2016, p. 129). Each of the 16 states with State independence has the executive, that is, state government (Landesregierung). And one state government—as with the federal government—is composed of the Prime Minister or Mayor (Ministerpräsident or Bürgermeister) as the Head of the state government and a certain number of Ministers (Landesminister). Therefore, each state also is considered a government corresponding to the concept (a) aside from the federal government (Yang, 2017, p. 43).

(b) is a concept based on the ‘System Theory’ that government is a collective of public organizations with common goals, and administration such as operation and management of those organizations, is carried out by government officials responsible for their own duties (Choi, Yoon, & Kim, 2012, p. 59). It can be seen as a conventional symbol that is not based on specific laws but is ideated in everyday life.

British political scientists Rod Hague and Martin Harrop (2004, pp. 4-5) said that a community needs special institutions with public authority to make and enforce collective decisions, and these institutions form the government. And they explained that the government offers the benefits of security and predictability as well as efficiency by establishing a standard way of reaching and enforcing decision-making, namely laws and systems. And they expanded on the government as follows.

“In popular use, ‘the government’ refers just to the highest level of political appointments: to presidents, prime ministers and cabinet members. But in a broader sense, government consists of all organizations charged with reaching and implementing decisions for the community. Thus, public servants, judges and the police all form part of the government, even though such people are not usually appointed by political methods such as election.” (Hague, & Harrop, 2004, p. 5).

Under the concept (b), irrespective of rank, state organs exercising public authority and all government officials working in those correspond to ‘government’.

Considering a high-ranking official as an example, the Federal President (Bundespräsident) does not belong to the federal government (the executive) under the German Basic Law. Even though the Federal President has no substantive executive power—unlike the Federal Chancellor as the Head of the federal government—he is the Head of State representing the federation in international law and has the symbolic authority and politically potential influence (“Einflussmöglichkeit”) both internally and externally, including conclusion of treaties with foreign countries, accreditation of foreign envoys, appointment/dismissal of federal judges and civil servants, and exercising the right of pardon (article 59 clause 1 and article 60 clause 1·2 of the Basic Law) (Strohmeier, 2008, pp. 194-195, 197).

In the case of lower-level officials working at state organs, policy decisions and themselves acting accordingly are commonly referred to as ‘government’ by the public. This is in the same vein as the above mentioned ‘attribution of conduct to a state’ and ‘principle of the unity of the state’ and means that the results of public officials’ exercise of public power, regardless of their rank, are all attributed to the relevant organs and in a broad sense the government. This interpretation is also supported through article 34 of the German Basic Law¹³.

As far as here, the concepts of government, which are interpreted and used in different meanings, were largely organized on international/domestic levels and further, subdivided into (a) and (b) on a domestic level.

In conclusion, this study takes the concept of government on the domestic level, because of a comparative study of the same phenomenon that domestically occurs due to the government in South Korea and Germany

¹³ Grundgesetz für die Bundesrepublik Deutschland, Art 34

Verletzt jemand in Ausübung eines ihm anvertrauten öffentlichen Amtes die ihm einem Dritten gegenüber obliegende Amtspflicht, so trifft die Verantwortlichkeit grundsätzlich den Staat oder die Körperschaft, in deren Dienst er steht.

respectively; it basically focuses on (a), namely, the executive (central or federal government) as an entity fragmented by the separation of powers in constitutional law—including state governments (Landesregierungen) with State independence in the case of Germany. This is because the scope is narrowed when government is limited to the narrow concept (a), making it easy to draw conclusions.

Nevertheless, when it takes the broad government concept (b) with reflecting the views of society and the public, it has advantages in comprehensively understanding government actors' behavior and in seeking various ways to enhance press freedom by grasping any phenomenon of 'what governments exert on the press' more strictly and broadly. Thus, it is determined that the concept (b) should not be completely excluded.

2.3 Government and the Press

2.3.1 Government vs. the Press: Ideological Conflict, Inverse Relation of Power

The conflict between government and the press begins from an ideological dimension. German sociologist Max Weber argues—in his classical analysis of bureaucracy as a form of social organization—that the obsession with confidentiality is a key characteristic of administrative bodies. According to Weber, such an obsession is based on a functional need, because confidentiality is required to be kept at certain levels of operation for both private and governmental organizations, in order for these to gain a superior position vis-à-vis their competitors. Furthermore, the need for such confidentiality is particularly prominent for military and diplomatic bodies. For instance, in all countries, military administrative agencies emphasize the concealment of its important decisions and activities (Rourke, 1961, p. 21).

The government's position is that certain levels of confidentiality are needed for the benefit of the entire nation and society and that, for this purpose, on certain occasions, there may be restrictions on the freedom of information. However, the press emphasizes the importance of information disclosure, and argues that the greatest benefit can be attained by maximizing circulation and publicization of information. As a result, the press and the government enter into ideological conflict.

In addition, there are further practical conflicts beyond ideology, when the press and government each tries to fulfil its own role. The press seeks to investigate and report freely, based on its argument that the citizens of a State, as the 'owners' of a democracy, have a right to know, which the press simultaneously protects and satisfies (Lee, 2005, p. 237). For the government, the press, which constantly criticizes it and takes on an aggressive and unfriendly attitude, cannot be but a tough and uncomfortable opponent. Consequently, there is a subtle tension between the government (the powerful) and the atmosphere of press freedom, in which the press is able to independently and freely carry out its role (Lee, Neeley, & Stewart, 2011, p. 33).

American journalism scholar Fredrick S. Siebert (1952, pp. 6, 10) argues that the concepts of 'press freedom' and 'sovereignty' had been established as crucial elements of a social system in the 18th Century and are very closely related, in fact, that there is an 'inverse relationship in power' between them. He carried out a chronological analysis of the relationship between press freedom and political power in the UK for 300 years, since 1470. Through this study he found that when the political power (government) became unstable and had a greater desire for stability, its regulation and control over the press strengthened, and vice versa. In other words, the political power (government) perceives itself as being attacked by the press, or that the press is a serious threat, for which it protects itself from it by regulating and controlling it. Siebert adds that press control is present in all types of governments, albeit with a difference in the degree of control, depending on the nature of the government—monarchy, totalitarian, democratic—because threats to power and instabilities of power always exist regardless of the form of government. This means that even if both the press and the government pursue national development and public interest—in democracies, at least—a conflict between the press, which emphasizes the freedom of investigation and reporting to protect the citizens' right to know, and the government, which uses its authority for the sake of keeping confidentiality during the administration of state and policy, is inevitable.

Hence, it is possible to deduce that the government (the powerful) will continue to pressure and control the press for maintaining and strengthening its authority, and the press will continue to be threatened. However, at the same time, the press will continuously demand its freedom and continue its struggle against the government (the powerful).

2.3.2 What Governments exert on the Press

2.3.2.1 'Press Freedom' as a Relative Concept

To discuss 'what governments exert on the press' in the 21st century and grasp the concepts, mentioning 'press freedom' is inevitable. Therefore, the concept of press freedom and the link between it and 'what governments exert on the press' is first described.

Since the publication of John Milton's *Aeropagitica* in 1644, freedom of expression, and particularly freedom of the press has been emphasized in Western countries. Press freedom, usually defined as "freedom from government controls", has been widely debated by journalists, philosophers, lawmakers, and even laymen for centuries. And today it is still being stressed in the 21st century (Weaver, 1977, p. 152).

However, the Commission on Freedom of the Press in the US, widely known as the Hutchins Commission, wrote on its report that while press freedom is certainly essential for the guarantee of other kinds of freedoms, its concept cannot be defined and depends on social circumstances (Gunaratne, 2005, p. 345).

"Freedom of the press is essential to political liberty. Where men cannot freely convey their thoughts to one another, no freedom is secure. Where freedom of expression exists, the beginnings of a free society and a means for every extension of liberty are already present. Free expression is therefore unique among liberties: it promotes and protects all the rest. ... It must be observed that freedom of the press is not a fixed and isolated value, the same in every society and in all times. It is a function within a society and must vary with the social context. It will be different in times of general security and in times of crisis; it will be different under varying states of public emotion and belief." (Commission on Freedom of the Press, 1947, pp. 6, 12)

US journalism scholar David H. Weaver (1977, p. 152) also said, there has never been an agreement on a precise definition of press freedom, but there seems to be a realization that such freedom varies across time and across nations of the world.

On the other hand, US social scientist Raymond D. Gastil (1990, pp. 36-37) regarded 'press and broadcasting independent of government (political censorship)', that is, the state of a country's press and broadcasting facilities being independent of government interference or direction as freedom of the press.

Journalism scholar Chris W. Ogbondah (1994, p. 13), who has researched media systems in Africa, argued that press freedom was essential to provide participation in a society for the citizens, and defined it: "Press freedom is the absence of prior restraints and governmental attacks on the press and journalists for expressions of ideas, information and opinions made in the overall interest of the citizens of a society."

Many mass communications scholars and researchers have defined the concept of press freedom in their own way, but so far there is no single unified concept. Also, since freedom of the press itself is an abstract term, its concept definition may vary depending on the degree of freedom and independence enjoyed by journalists, awareness/perception of their domestic media environment, and views on the role of the press (Ogondah, 1994, pp. 9-12; Färdigh, 2007, pp. 6-7).

Therefore, there is no choice but to need 'something' to contrast with the concept of press freedom so that the concept can be outlined. For this reason, when discussing press freedom, together and frequently mentioned words are 'government' and 'press control' (Ogbondah, 1994, pp. 9-13; Gunaratne, 2002, pp. 345-349, Färdigh, 2007, pp. 6-8).

In fact, most of the researches on press freedom defined its concept by using the words ‘government’ and ‘press control’ and further have measured its degree and level (Nixon, 1960; Lowenstein, 1967; Weaver, 1977; Becker & Vlad & Nusser, 2007). In the 21st century, as the most representative global surveys on press freedom, there are examples such as *Freedom of the Press* by Freedom House, Annual Census of journalists killed and imprisoned around the world by Committee to Protect Journalists (CPJ), *Media Sustainability Index* by International Research & Exchanges Board (IREX), and *Worldwide Press Freedom Index* by Reporters sans frontières (RSF).

In other words, to identify whether or not the existence of press freedom, paradoxically the contrary concept ‘press control’ is utilized (Weaver, 1977, p. 152; Weaver, & Buddenbaum, 1983, p. 1; Weaver, Buddenbaum, & Fair, 1985, p. 104). As such, press freedom and press control are inseparable as a relative concept to each other.

In conclusion, it is inevitable to mention the word ‘press freedom’ in identifying ‘what governments exert on the press’, and furthermore, it is unavoidable to draw or deduce the concept of press control in reverse from the concept of press freedom.

2.3.2.2 Concept of ‘Press Control’ (with tracing preceding studies)

Among ‘what governments exert on the press’, it first discusses press control that apparently stands out as a relative concept of press freedom.

As a methodology for deriving the concept of press control, empirical studies on the topic of press control (or press freedom) and frequently cited major preceding researches—among those that have been faced several times while the researcher reviewed the existing research, a kind of ‘purposive sampling’—are analyzed chronologically. The review of these empirical and major preceding researches is intended to draw a more robust and generalizable framework for the concept, based on notions of press control and related terms that have been identified in each of them (Marczyk, DeMatteo, & Festinger, 2005, p. 34).

The review begins with research on press control (or press control freedom) that emerged as the mass media industry developed and expanded rapidly in the 1950s after the Second World War (Baker, & George, 2009, pp. 7, 24; Lee, 2010, p. 162).

US journalism scholar Raymond B. Nixon saw press control and press freedom as a continuum, without separating them (Kim, 2009, p. 13). Nixon (1960, p. 17) defined a government or a political group in power which is characterized by “a permanent censorship or a constant and general control of the press” as an authoritarian regime¹⁴ and said that “one marked by the absence of such a permanent censorship or constant and general control” is a free press system.

Nixon (1960, p. 17) viewed the chief criterion for dividing control and freedom as “the degree of control normally exercised by any official agency which has the power to interfere with the dissemination and discussion of news”. Then in order to measure the levels of press control (press freedom), he classified press control articles reported in 61 countries in 1951-1960 and established 7 categories, namely a ‘typology’ of governmental press control¹⁵ (Nixon, 1960, pp. 18-19).

US journalism scholar Ralph L. Lowenstein (1967, pp. 51-53; 1970, pp. 131-132) expanded and further concretized Nixon’s classification to set up 23 press control criteria to be used to assess a country’s freedom of the press¹⁶. For example, he defined the range of media included in the term ‘press’ to add concreteness to Nixon’s definition (Lowenstein, 1967, p. 45; Ogbondah, 1994, p. 10). Through this, he sought to measure “Press Independent and Critical Ability”, namely the degree of press freedom.

¹⁴ US journalistic historian David Paul Nord (1977, p. 8) defined briefly the term ‘Authoritarian’ based on *Four Theories of the Press* (Siebert, Peterson, & Schramm, 1956): “Under an authoritarian system, the press may be privately owned but through negative constraints such as licenses, patents, or censorship the government exercises total control. The purpose of the press is to support the aims of the government.”

¹⁵ See Appendix 1.

¹⁶ See Appendix 2.

With his PICA criteria, Lowenstein aimed to grasp not only the reality of press control but also components and structure that cause press control. In other words, he included indicators ranging from legal controls, to concentration of ownership, to pressure from labor unions (Nord, 1977, p. 10). And he defined “free” press and “controlled” press as follows.

“A completely free press is one in which newspapers, periodicals, news agencies, books, radio and television have absolute independence and critical ability, except for minimal libel and obscenity laws. The press has no concentrated ownership, marginal economic units or organized self-regulation. A completely controlled press is one with no independence or critical ability. Under it, newspapers, periodicals, books, news agencies, radio and television are completely controlled directly or indirectly by government, self-regulatory bodies or concentrated ownership.” (Lowenstein, 1967, p. 45; 1970, p. 131)

On the other hand, Lowenstein’s research was evaluated as lacking theoretical coherence in that PICA criteria included economic variables (Nord, 1977, p. 10). In this sense, through statistical proof—assessment of unidimensionality—Kurt. E. Kent (1972, pp. 69-70) removed eight of Lowenstein’s 23 PICA criteria that were deemed to be unrelated to government pressures on the press, leaving 15.

Kent’s research (1972, pp. 66, 71) focused solely on actual or potential governmental pressures on the press. By Kent, the 15 press freedom variables that were shown to be statistically significant in relation to government pressures are (keywords)¹⁷: Libel, Foreign exchange, Media licensing, Advertising, Ownership, Foreign news, Subsidies, Newsprint, Tax rate, Domestic news, Favoritism, Ban publications, Personnel licensing, Loans, Circulation.

US journalism scholar David H. Weaver (1977) said that by reviewing various studies on press freedom in the UK and the US, its concept appeared to be basically defined in three ways. So, he defined the concept of press freedom:

“(1) the relative absence of governmental restraints on the media, (2) the relative absence of governmental and all other restraints on the media, (3) not only the absence of restraints on mass media, but also the presence of those conditions necessary to insure the dissemination of a diversity of ideas and opinions to a relatively large audience, such as an enforced right of access to newspapers and radio stations.” (Weaver, 1977, p. 156)

Based on this concept of press freedom, Weaver (1977, pp. 153, 168-169) conducted path analysis of causal relationships among 7 variables¹⁸ believed to be related to press freedom (press control), using data collected for 137 countries at four different points in 1950, 1960, 1965 and 1966. As a result, he confirmed that an increase in accountability of governors often leads to a decrease in government control of the press.

Especially Weaver (1977, p. 157) used a Guttman scale (0-5 points) with relation to the extent of government control on the media in measuring the amount of press freedom in 1950. The items in this scale include government ownership of newspapers, economic pressures by government on mass media, political censorship, restrictions on free criticism of government policies, and government ownership of broadcasting facilities.

US social scientist and director of Freedom House’s annual survey (1977-1988) Raymond D. Gastil (1980, p. 70-73) measured government control of print media such as domestic newspapers and news magazines as well as broadcast media like radio and TV in 154 countries in 1979 and identified the existence of a government news agency. Then he classified each media as “Free”, “Partly Free”, or “Generally Not Free” depending on the measuring scores.

Gastil took into account the following indicators to measure government control of the media at the time of the

¹⁷ See Appendix 3.

¹⁸ The 7 variables are availability of resources, urbanism, educational level, mass media development, stress on government, accountability of governors, and government control of the press.

investigation: government ownership of the media, government censorship, restrictions on criticism, and other forms of government pressure on the media (Weaver, & Buddenbaum, 1983, p. 11; Weaver, Buddenbaum, & Fair, 1985, p. 109).

Weaver, Buddenbaum and Fair (1985) measured changes in the degree of governmental press control in 134 countries by comparing the 1950 data, which Weaver (1977) used in his previous research, and the new 1979 data and based on that, they determined the levels of press freedom. The measurement of governmental press control in 1979 was carried out based on a list of print and broadcasting media of each nation that Gastil (1980) had previously classified as “Free”, “Partly Free”, or “Generally Not Free”, and measures that had been derived from an extensive review of previous various studies of press freedom (Weaver, & Buddenbaum, 1983, pp. 10-11; Weaver, Buddenbaum, & Fair, 1985, pp. 108-109; Gunaratne, 2002, p. 350).

What stands out in the research by Weaver et al. is that the governments in underdeveloped countries take advantage of the press as a tool to maintain power: “In the less developed countries increased resources¹⁹ in 1950 are strongly associated with increased (rather than decreased) government control of the press in 1979. This suggests that, in the more prosperous of the Third World countries, the governments have been unwilling to reduce controls on the media, perhaps because these media tend to be used to facilitate the functioning of the economy and to perpetuate the power of the rulers.” (Weaver, Buddenbaum, & Fair, 1985, p. 114)

Since 1979, Freedom House, a US-based nongovernmental organization, has been measuring the degrees of worldwide press freedom (over 190 countries) through its annual international survey *Freedom of the Press*. In the annual survey, methodological changes have been made periodically and have sometimes led to new categories, indicators, and scales.

From 1980 to 1993, Freedom House had merely classified print and broadcasting systems in countries into ‘free’, ‘partly free’, or ‘not free’ categories. From 1994, it started assigning ‘press freedom’ numerical scores to each country under four criteria that it claimed were founded on Article 19 of the Universal Declaration of Human Rights²⁰ (Gunaratne, 2002 p. 350). The four categories and indicators are (Freedom House, 2017):

- A. Laws and regulations that influence media content
- B. Political pressures and controls on media content
- C. Economic influences over media content
- D. Repressive actions (killing of journalists, physical violence against journalists or facilities, censorship, self-censorship, harassment, expulsions, etc.)

From 2002 to 2017, its methodology has been refined and expanded to capture changes in the news and information environment²¹, particularly to expand on the language for the indicators. For example, the methodology was modified to incorporate digital media and moreover, in 2011 the term “bloggers” was specifically added to methodological questions about journalists (Schneider, 2014, p. 14). As a result, Freedom House has evaluated ‘press freedom’ levels and scores in each country through 23 methodology questions divided into three broad categories. The three categories and representative indicators are (keywords)²²:

- A'. Legal Environment: laws and regulations that could influence media content; practice to enable or restrict the media’s ability to operate; potentially negative aspects of security legislation, the penal code, and other statutes; penalties for libel and defamation; independence of the judiciary and official regulatory bodies
- B'. Political Environment: political influence in the content of news media; editorial independence of both state-

¹⁹ According to Weaver (1977, p. 163), “In sociological studies of national development, the term ‘resources’ usually refers to the relative supply of material goods available in a society. ... Considering past studies, availability of resources is defined in this study as the relative supply of material goods per person in a country, including such diverse ‘goods’ as food, shelter, clothing, transportation and energy.”

²⁰ Article 19 of the Universal Declaration of Human Rights, “Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.” (proclaimed by the United Nations General Assembly in Paris on 10 December 1948)

²¹ Since 2011, Freedom House has been separately publishing the annual report *Freedom on the Net*, which measures each country’s level of internet and digital media freedom as the reliance on the Internet increasingly rises.

²² See Appendix 4.

owned and privately owned outlets; official censorship and self-censorship; ability to cover the news in person without obstacles or harassment; reprisals against journalists or bloggers by the state or other actors

C'. Economic Environment: economic pressures on the media; structure of media ownership; transparency and concentration of ownership; costs of establishing media as well as any impediments to news production and distribution; selective withholding of advertising or subsidies by the state or other actors

At the same period of time, the Committee to Protect Journalists (n.d., “Our Mission and Our Research”) based in the United States, defined press freedom as “the right of journalists to report the news safely and without fear of reprisal” and journalists as “people who cover news or comment on public affairs through any media”. To aim to defend the rights of journalists and promote press freedom worldwide, CPJ has released its annual census of journalists killed and imprisoned around the world since 1992 (Becker, Vlad, & Nusser, 2007, p. 11).

Cases identified as a “violation of press freedom” by CPJ (n.d., “Methodology of CPJ’s annual census”) are classified into the following categories and variables: journalists imprisoned (detained, missing, abducted), journalists killed (motive confirmed/unconfirmed, staff journalists or freelancers), type of death (crossfire/combat, dangerous assignment, murder), suspected source of fire in killings of journalists (political groups, government officials, military officials, paramilitary groups, criminal groups, mob violence, local residents), impunity in murder cases (complete impunity, partial justice, full justice).

Reporters sans frontières (n.d., “Our Values”; n.d., “Detailed Methodology”) based in France, regarded media freedom as “the basic human right to be informed and to inform others” and set up the following 7 criteria categories in the questionnaire for pooling the responses of experts on the degree of freedom available to journalists in 180 countries: country’s performance as regards pluralism, media independence, media environment and self-censorship, legislative framework, transparency, the quality of infrastructures supporting the production of news and information, and the levels of abuses and violence against journalists. RSF has released *Worldwide Press Freedom Index* since 2002.

As stated above, individual researchers or research organizations have worked to understand the press-government relationships in their time and the consequent reality of press control, and as a means of achieving the objective, they came up with research indicators and analysis categories for measuring press control (press freedom) (Nixon, 1960; Lowenstein, 1967; Nord, 1977; Ogondah, 1994; Becker, Vlad, & Nusser, 2007; Schneider, 2014). Moreover, these scholars have practically shared the ideas that they are clearly understood only when quantification has developed and that through the application of well-defined instruments to measure press control (press freedom), it is possible to improve press freedom and further to predict significant changes in society. So, there is a close correspondence between the indicators as well as the analysis categories of individual studies (Lowenstein, 1967, pp. 14-23; 1970, p. 131; Kent, 1972, p. 67; Weaver, 1977, p. 152; Weaver, Buddenbaum, & Fair, 1985, p. 108; Ogondah, 1994, p. 10; Becker, Vlad, & Nusser, 2007, p. 5).

For a critical analysis, the following is a summary of keywords shown in press control (press freedom) concepts, research indicators, analysis categories and variables in each of the researches.

Researcher or Research Organization (year)	Keywords used to define the concept of press control (press freedom) or included in research indicators, analysis categories and variables
Nixon (1960)	<ul style="list-style-type: none"> • authoritarian regime • political group in power • permanent censorship or constant and general control
Lowenstein (1967)	<ul style="list-style-type: none"> • control directly or indirectly by the government • no independence or critical ability
Kent (1972)	<ul style="list-style-type: none"> • actual or potential governmental pressures on the press

Weaver (1977)	<ul style="list-style-type: none"> • press freedom defined as the relative absence of governmental restraints on the media • government control of the press • restrictions on free criticism of government policies
Gastil (1980)	<ul style="list-style-type: none"> • government censorship • restrictions on criticism • government pressure on the media
Weaver, Buddenbaum, & Fair (1985)	<ul style="list-style-type: none"> • Press freedom on the basis of the degree of government control of the press
Freedom House's <i>Freedom of the Press</i> (1980-2017, every year)	<ul style="list-style-type: none"> * by 1994-2001 • laws and regulations that influence media content • political pressures and controls on media content • repressive actions, censorship, self-censorship
	<ul style="list-style-type: none"> * by 2002-2017 • independence of the judiciary and official regulatory bodies • official censorship and self-censorship • reprisals against journalists or bloggers by the state or other actors
Committee to Protect Journalists' Annual Census (Since 1992, every year)	<ul style="list-style-type: none"> • violation of press freedom • imprisoned journalists • reprisal
Reporters sans frontières' <i>Worldwide Press Freedom Index</i> (Since 2002, every year)	<ul style="list-style-type: none"> • country's performance as regards pluralism • media independence • self-censorship • legislative framework • abuses and violence against journalists

Figure 1 Keywords that have been used by the preceding researches on the topic of press control (press freedom)

Taking a look at <Figure 1>, the terms such as control, official censorship, self-censorship, political pressures, restraints, restrictions, regulations, influence, repressive actions, reprisals, imprisonment, abuses, violence, and no independence were used to refer to press control. And as actors who execute or order to execute these, there are government, authoritarian regime, political group in power, the judiciary, official regulatory bodies, the state, and other actors.

In conclusion, these keywords are the basic terminologies that embody the concept of press control and show its characteristics. In other words, press control is the opposite of press freedom, featured by directly(physically)/indirectly obstructing or restricting normal journalism activities of media companies or journalists (media actors). And it is executed in many ways by the government—i.e., government organs or officials that can exercise authority over the press—or a political group in power.

However, as shown in preceding researches, while research indicators, analysis categories and variables for identifying and verifying press control (press freedom) are becoming more specific over time, its concept is expanded (rather than reduced) in terms of media and journalist concepts and is not yet fixed (Nord, 1977, p. 10; Ogbondah, 1994, p. 10; Becker, Vlad, & Nusser, 2007, pp. 11, 19; Schneider, 2014, p. 14). Thus, as with the concept of press freedom mentioned earlier, it is also not possible to generalize the concept of press control, which is a relative concept of press freedom.

Meanwhile, since the late 20th century, global press control (press freedom) surveys have been conducted by international non-governmental organizations including Freedom House, Committee to Protect Journalists (CPJ), Reporters sans frontières (RSF), and International Research & Exchanges Board (IREX), not individual scholars. As for this trend, we can take the hint from some statement of US journalism scholar John C. Nerone (1995, p. 160): “The press itself has become globalized. It is no longer only the nation-state out of which the press operates that most significantly determines journalistic practice.” In other words, it can be attributed to the perceptions that press freedom is an international concern, not confined to just one country or culture and that control of the press is no longer just a matter of press circles including journalists (Kent, 1972, p. 67).

This can also be seen as a change in the perspective on the concept of press control (press freedom). Swedish journalism scholar Mathias A. Färdigh (2007, p. 7) argued that the early definition of the concept of press freedom reflected post-Second World War geopolitical construction and primarily focused on freedom from government control, whereas its later definition was divided into a classical liberal perspective on press freedom—the media should serve to protect the individual from the abuses of the state—and a more radical democratic perspective—media should seek to redress the imbalances in society, and between the degree of freedom and independence enjoyed by the media and the degree of freedom and access of citizens to media content.

2.3.2.2.1 Relevant Keywords: Authoritarian Regime, Self-Censorship

This chapter describes, as a subject implementing press control, an authoritarian regime with implications concerning press control. And then, it elucidates self-censorship that has been named as one of the forms of restricting press freedom.

a. Authoritarian Regime

To find the origin of the concept of ‘authoritarianism’, it would trace back to the ancient Greek philosopher Plato’s books *Politeia* (The Republic), *Nomoi* (Laws) and the Renaissance Italian political philosopher Machiavelli’s book *Il Principe* (The Prince) (Siebert, Peterson, & Schramm, 1956, pp. 12-13). In particular, *Leviathan* (1651), a book by British political philosopher Thomas Hobbes’s, is mentioned as a representative, which had been cited by governments since the 17th century to justify authoritarian policies and arbitrary actions (Siebert, Peterson, & Schramm, 1956, pp. 13-14). From such books, however, there is no clear definition of the substance of ‘authoritarianism’.

In modern society, a theorized version of the government’s authoritarian approach to media and control of the press was the ‘authoritarian theory’ by Fred S. Siebert that is included *Four Theories of the Press* (Siebert, Peterson, & Schramm, 1956).

According to the authoritarian theory, although the private sector can operate media outlets, the government conducts censorship with the authority to grant business licenses. And if the media’s reporting attitude is unfavorable to the governing ideology or policy of the regime (the powerful), the government can impose control or revoke licenses (i.e., shutdown) (Siebert, Peterson, & Schramm, 1956, pp. 18-36). In other words, the government can use the media as a means to achieve its objectives and as an instrument to contribute to the success of its policies, hence press control is justified (Siebert, Peterson, & Schramm, 1956, p. 18). In particular, Siebert (1956, p. 37) argued that “the practices of authoritarian states have tended to influence democratic practices,” although the authoritarian theory itself is said to have been discarded in most democratic countries.

Since then, ‘authoritarianism’ has been conceptualized more specifically for empirical research. For the first time, the International Press Institute (1959, p. 7) conducted a cross-national survey to identify the position of the press under the then authoritarian regimes of the 1950s since the Second World War. For the purpose of this survey, the institute (1959, p. 8) defined authoritarian regimes as those “with a permanent censorship or a constant and general control of the press”. This definition was also used since then, as reflected in Nixon’s research measuring levels of press control (press freedom) in each country (Nixon, 1960, pp. 14, 17; Ogbondah, 1994, p. 10).

In fact, from before the concept of authoritarianism was concretized, the government's authoritarian approach to media and control of the press appeared even in the constitutional republic, not in an authoritarian regime. Lowenstein (1967, pp. 20) cited the Weimar Republic (1919-1933) of Germany as the case. For example, by the central government at Berlin in 1924, suspension of some newspapers for critical articles, and favoritism and outright censorship in release of government news; under the 'emergency press decrees (Pressenotverordnungen)' issued during the economic crisis of 1931-1932, stricter libel control and forced publication of corrections and rebuttals. Lowenstein (1967, pp. 19, 21) said that the trend toward tighter press control in Germany in the 1920s showed moving from a free/authoritarian system to an authoritarian dictatorship, that is, Nazi Germany (1933-1945) and that in this sense, the position of the press serves as an index or predictor of change in the political system.

Authoritarian regimes were once distinguished from democratic regimes by dichotomous paradigm—in the context of 'the third wave of democratization', the whole world had made a political transition from authoritarian regimes to democratic ones in the 1970s and 1980s. However, with the advent of a retrogressive situation from democracy to non-democracy, a 21st-century authoritarian regime refers to "the whole variety of non-democratic regimes rather than to a specific regime within that group" (Rombouts, 2004, p. 8). In this context, comparative political science research views the terms authoritarian regime, autocracy and dictatorship as interchangeable. In detail, the authoritarian type of regime allows for socio-economic pluralism without guiding ideology and its leadership exercises power within a less defined norm-structure with acknowledging some level of internal organizational autonomy.

In conclusion, an authoritarian regime in the 21st century is no longer dichotomically divided with a democratic regime as its meanings change and expand. An authoritarian regime represents a cluster of regimes²³ on the lower range of the democratic spectrum, while a democratic regime is at the higher end. Democracy means an institutional quality that is principally a matter of degree (Hadenius, & Teorell, 2006, p. 5; Wahman, Teorell, & Hadenius, 2013, p. 21).

This suggests that even in a state with a democratic system, the authoritarian regime—so-called 'semi-democracy'²⁴—can emerge depending on the orientations of a group (the powerful) in power (Hague, & Harrop, 2004, p. 47). Freedom House (2019, p. 3) wrote in its annual report that US President Donald Trump has pumped "continual vilification of the press" and "repeatedly threatened to strengthen libel laws, revoke the licenses of certain broadcasters, and damage media owners' other business interests", which is one of the examples supporting this.

Furthermore, the above-mentioned tendency and feature of authoritarianism in the 1950s which was identified by Siebert—the impact of authoritarian states on democratic practices—still appears in the 21st century.

"Indeed, authoritarian efforts to place restrictions on the press, new media, and other instruments of expression gained momentum in a number of strategically important countries, such as China, Iran, Russia, and Venezuela. These states were also notable for their attempts to restrict media freedom and influence the news agenda beyond their borders." (Freedom House, 2011, p. 20)

"Russia, China seek to expand influence. As the media came under pressure in democratic countries, authoritarian leaders compounded the problem by seeking to increase their influence abroad (with using their overseas news media or taking over influential foreign media)." (Freedom House, 2017, p. 9)

²³ Political scientists Michael Wahmana, Jan Teorellb and Axel Hadenius (2013, pp. 24-28) classified authoritarian regimes into six categories:

- Authoritarian regimes without elected legislatures (2): Military regime, Monarchy
- Authoritarian regimes with elected legislatures (3): No-party regime, One-party regime, Multi-party authoritarian regime (* Since the end of the Cold War, the number of authoritarian regimes arranging elections has increased dramatically.)
- Hybrid regime (1) (combination of two regime types)

²⁴ Semi-democracy blends democratic and authoritarian elements in stable combination. A ruler is elected, he/she governs with little respect for individual rights and often harass opposition or even non-official groups (Hague, & Harrop, 2004, p. 47).

b. Self-Censorship

As above-mentioned, one of the most representative means used by authoritarian regimes to control the press is censorship²⁵, and it can be said that the censorship's ultimate goal is the habituation of 'self-censorship' in which press circles voluntarily avoid unfavorable reporting to the regime (Cheung, 2000, pp. 15-16). As one of the phenomena which occur when government pressure is intensified and accumulated²⁶, US journalism scholar Leonard R. Sussman (1989, pp. 164-165, 203) pointed out self-censorship by journalists and managements. Rosental Alves, a journalist-turned-journalism scholar who had covered coups and dictatorships in Latin American for years, articulated, "Censorship was only replaced by self-censorship, which is the worst form of censorship." (James, 2007, p. 43)

Self-censorship, classified as an internal and unofficial method²⁷ of control over the press, literally refers to a "situations in which journalists voluntarily censor themselves" or an "internally self-imposed censorship", not externally (Burt, 1998, p. 21; Zelizer, & Allan, 2010, p. 140; Cho, 2017, p. 51). However, there are various analyses and approaches to self-censorship and therefore its definition varies.

In journalism, self-censorship encompasses the thought process which prompts journalists to ignore or minimize certain viewpoints during practicing journalism in deference to the news and political values adopted and propagated by their line managers or employers (Franklin et al., 2005, p. 239; Cho, 2017, p. 51). This self-censorship makes journalists marginalize or ignore the views of some social groups perceived as radical and instead pander to the prevailing views within their organization's hierarchy (Franklin et al., 2005, p. 239).

Self-censorship is also defined as nonexternally compelled acts committed by media organizations aiming to avoid offending power holders such as governments, advertisers and major business corporations (Lee, & Chan, 2009, p. 112). Under this self-censorship, journalists or editors decide not to pursue a particular dimension in certain issues/news stories for anticipated fears that such reporting would engender harmful repercussions (Zelizer, & Allan, 2010, p. 140).

To sum up the definitions, the factors that cause self-censorship include not only political power (governments) but also economic power such as advertisers (Pew Research Center, 2000). And media organizations (incl. journalists) tend to voluntarily censor themselves to avoid practical disadvantages only with anticipated fears. The politicization (or clientelism) being expanded within media outlets that have faced falling profits (intensifying competition) amid the economic crisis, is pointed out as one of the factors that promote it (European Commission, 2014, p. 3). Based on these, we can see that self-censorship is not the preserve that appears only in authoritarian regimes (Nilsson, & Örnebring, 2016; Festenstein, 2018, p. 325).

Moreover, self-censorships of media companies and journalists are not only conducted by direct/indirect pressure and control from outside the organization but also pre-emptively by a calculating self-judgment inside the organization under its existence—which is based on, cynically speaking, a self-serving and instinctive reflex, far-

²⁵ The upper concept of self-censorship, 'censorship', is a term that is mentioned in various fields such as media, publishing, and film, and therefore as a broad sense, it refers to "the suppression of expression, ideas or information considered dangerous, harmful, threatening, objectionable or otherwise undesirable by those in power." Censorship derives from various impulses with a religious, political, military, corporate or moral nature, or any combination (Zelizer, & Allan, 2010, p. 17).

In the dimension of journalism, the Committee for Protect Journalists (n.d., "Frequently Asked Questions: How does CPJ investigate and classify attacks on the press?") gives an operational definition of the term "Censored" for an annual census of press freedom (press control): officially suppressed or banned; editions confiscated; news outlets closed.

²⁶ Sussman (1989, pp. 164-165) argued that governmental pressures on the press cause the following phenomena:

- Self-censorship by journalists and managements
- Muzzling of journalists by editors and managements
- Media councils created by government
- Labor union pressures, including strikes, to influence content of the media, as well as secure job improvement
- Financial dependence on government of weak media
- Linkage of state and media power through government-owned media, producing tension for the weaker, independent media where they are permitted

²⁷ See <Figure 2>.

removed from the pursuit of objectivity and fairness (Franklin et al., 2005, p. 239). This type of self-censorship can be seen as the extension of external censorship or a proxy act of obedient for it. Hong Kong media-related jurist Anne S. Y. Cheung (2000, p. 2) identified the fact that her own journalists had practiced self-censorship through internalization of norms set by the ruling regime, and stipulated it as “a process of semi-socialization”. And Cheung (2000, p. 13) said that individuals who share the same values with the ruling regime may not only not feel any pressure or constraints but deny even the existence of conflicts.

Most of all, in terms of the chilling effect which self-censorship causes, scholars regard self-censorship as “an ordinary vice” that undermines the culture of openness and publicity that characterizes democratic societies (Festenstein, 2018, p. 335); therefore, as with censorship, they have stressed the need to be wary of self-censorship as a form of restricting freedom of the press and information (Cheung, 2000, pp. 2, 12-13; Lee, & Chan, 2009, p. 112; Yesil, 2014; Clark, & Grech, 2017, p. 11; Majhosev, 2017, p. 100; Sharvit et al., 2018).

“Many journalists around the world practice self-censoring. Political, economic, cultural and social pressures and life-threatening actions are forcing journalists to self-censor. For fear of losing their jobs even losing their lives, journalists choose not to write everything they have found out and hide the facts they have discovered as a result of their search. This act put the future of journalism into danger.” (Yesil, 2014, p. 77)

“By self-censoring, the individual prevents others’ free access to the information and informally regulates the flow of information in society. Self-censorship then becomes a barrier to the dissemination of information that may be useful to the group. When individuals self-censor extensively, the functioning of democratic societies may be disrupted.” (Sharvit et al., 2018, p. 333)

“Self-censorship diminishes accountability by stifling the sincerity on which democratic debate relies, it erodes autonomy and it dilutes the epistemic quality of democratic debate.” (Festenstein, 2018, p. 332)

Meanwhile, political philosophers Philip Cook and Conrad Heilmann (2013, pp. 179, 187-188, 194) subdivided self-censorship through normative analysis of the interaction between censors and censees as follows.

- Public self-censorship: this refers to a range of individual reactions to a public censorship regime; individuals internalize some aspects of the public censor and then censor themselves. In here, the censor is a public agent such as government or public authority, and the censees are private individuals or corporations.
- Private self-censorship: this self-censorship happens from the suppression by an agent of individual attitudes where a public censor is either absent or irrelevant. Censor and censee are the same agent and sources for this self-censorship can be external or internal to an agent²⁸.
- Private self-censorship by proxy: when individuals censor themselves by taking a point of view external to their own private perspective (e.g. organizational norms or values)²⁹.
- Private self-censorship by self-constraint: when an individual follows his or her own conception of what it is permissible to express (e.g. a personal code or principle). The origin and nature of this standpoint are wholly internal to the individual³⁰.

In this regard, Korean journalism scholar Cho Hang-je (2017, pp. 45, 47, 58) elucidated that self-censorship originating from direct and indirect external threats and pressure is conducted inside (individual, organization, convention) and therefore it has the advantage that the objects of deletion or distortion are not revealed outside.

²⁸ Philip Cook and Conrad Heilmann (2013, p. 180) argued that principles of press freedom do not apply directly to the case of private self-censorship since the absence of an external censor during censorship makes the censorship non-coercive (Cook, & Heilmann, 2013, pp. 180, 194).

²⁹ Each country’s defamation law may cause journalists to avoid covering stories which have a high risk of provoking an expensive libel action (Franklin et al., 2005, p. 239).

³⁰ At the occupational level, journalists who are granted access to public figures such as politicians and celebrities or to the military in war zones, may sometimes intentionally tone down criticism in their questions or reports, in case their access privileges could be withdrawn (Franklin et al., 2005, p. 240). As an example of the national crisis, shortly after the 9/11 Attacks, 2001, US journalists were expected to be patriotic and uncritical to the government (Fourie, 2008, p. 459).

In this regard, Korean journalism scholar Cho Hang-je (2017, pp. 45, 47, 58) elucidated that self-censorship originating from direct and indirect external threats and pressure is conducted inside (individual, organization, convention) and therefore it has the advantage that the objects of deletion or distortion are not revealed outside. He also argued that as society becomes more democratized, external and official control which may engender great resistance tends to be internalized and unofficialized—because direct and explicit commands can trigger resistance from journalists (Lee, & Chan, 2009, p. 125)—and such subtle controls are preferred by democratic systems because they are unnoticeable and quite effective.

Based on qualitative research on self-censorship, Cheung (2000, p. 2) pointed out that self-censorship is generally a threat factor eroding journalists' sense of professionalism³¹ or sense of vocation but a kind of phenomenon of cognitive dissonance³² appears in journalists who have deeply involved in self-censorship. In other words, the 'self-censorship' journalists felt that they were enjoying greatest freedom but ironically, after declaring that they were victims of self-censorship, most of them asserted that behind their actions there was an organization that did not uphold professional ideals and ethics. Cheung (2000, p. 11) expressed that the journalists used the word 'self-censorship' as "a degrading term" to censure their media organization.

2.3.2.2.2 Types of Press Control

The type of press control depends on what criteria we take, and the classification of press control types in preceding studies dealing with the government as a subject of control actions is as follows.

UK communication theorist Denis McQuail (1992, pp. 81-83) divided social forces to be obstacles to the performance by a media organization such as a newspaper or television channel into largely two, based on their degree of influence—distance from an influencer: immediate and direct sources vs indirect sources. According to McQuail, owners, advertisers, news sources, and audiences are categorized as immediate and direct sources of influence that are relatively close to a media organization, whereas pressure groups, investors, government, and social/political institutions are categorized as indirect sources of influence.

McQuail (1992, p. 82) added that in the face of obstacles and constraints, an organization struggles to meet conflicting demands or expectations, and that in the case of strictly regulated public broadcasting, the government may have immediate and direct influence on it.

Korean journalism scholar Chung In-sook (1998, p. 63) regarded a government classified as an indirect source by McQuail as a prime direct source that is a very powerful influence factor in her domestic media situation. Instead, since democratization in the late 1980s, as the Korean press outwardly gained institutional freedom, the government's press control has changed from legal and institutional control to 'subtle' unofficial control, she claimed (1998, pp. 59-61). Therefore, Chung's research focused on press control by the government, and depending on whether the control follows legal and institutional procedures, it is divided into official and unofficial control as follows:

- Official control: where control is exerted in accordance with legal and institutional procedures, whether legal or illegal (e.g. public surveillance; issuance of press guidelines; lawsuits against media companies or journalists; arrest or detention of journalists; legal regulations restricting press activities, etc.)
- Unofficial control (subtle control): where control is expediently imposed without procedures (e.g. interference in content and form of reporting; request to expand promotional articles or to reduce or delete unfavorable ones; improper involvement in personnel appointments within media companies; access restriction to news sources (information control); providing material entertainment to journalists (burden of expenses for overseas coverage), etc.)

³¹ A sense of journalistic professionalism means the central idea that journalists are autonomous actors independent from political and economic power in the political communication process, and involves a set of principles and norms guiding and justifying journalistic practices (Lee, & Chan, 2009, p. 113).

³² Cognitive dissonance refers to a situation involving conflicting attitudes, beliefs or behaviors. This produces a feeling of mental discomfort leading to an alteration in one of the attitudes, beliefs or behaviors to reduce the discomfort and restore balance (McLeod, 2018).

Chung (1998, p. 64) argued that if government pressure is intensified or accumulated, a self-censorship phenomenon by journalists and executives appears (Sussman, 1989, p. 203), which could ultimately lead to direct control by media owners or indirect control by the government (political circles) over media owners.

Korean journalism scholar Lee Hyo-Sung (1996, pp. 344-346; Nam, 2006, p. 122) claimed that there exist various ways of press control in each country regardless of political systems whether authoritarian or democratic and presented three types of controlling the press by political power (government):

- Direct way: violent or repressive control (e.g. terrorism against media companies or journalists; lawsuits for defamation or dissemination of false information; investigations for violations of the National Security Law; press censorship; tax investigations of media companies or their mother corporations; threats of judicial action; surveillance of journalists and media companies, etc.)
- Indirect way: roundabout control by the government’s providing or suspending social or economic benefits to media companies or journalists(owners) (e.g. provision of grants or subsidies; request for government advertising; tax relief; guarantee of monopoly or oligopoly; provision of benefits to a certain business promoted by media company’s parent corporations, etc.)
- Proxy way: control by proxy(person/agency) on behalf of a government (e.g. by mobilizing agencies or committees occupied by the majority of persons who associate with the government and the ruling party—i.e., taking advantage of governance—appointment of pro-government figures to the CEOs of affiliated media companies, mainly public broadcasters)

In the case of proxy way, the government’s intention (message) of control is conveyed to media company’s representatives such as owner, CEO and executives, and realized through their orders (Lee, 1996, p. 345). This is supported by the argument and theory of other scholars abroad. US media scholar Edward S. Herman and linguist and philosopher Noam Chomsky (1988, p. 1) said that “it is clear that the media serve the ends of a dominant elite”. One of the so-called ‘the Laws of Journalism’ established by US veteran journalist and journalism scholar J. Herbert Altschull (1984, p. 298) is: “In all press systems, the news media are agents of those who exercise political and economic power. Newspapers, magazines, and broadcasting outlets thus are not independent actors, although they have the potential to exercise independent power.”

Lastly, Korean journalism scholars Nam Hyo-yun (2006, pp. 116-128) and Cho Hang-je (2017, pp. 46-51) saw a media organization as a unit that practices journalism, and Cho classified control, which centers on media companies, into four types (a 2×2 matrix) with taking ‘external/internal’ and ‘official/unofficial’ as criteria for classification.

Classification		External/Internal	
		External	Internal
Official/ Unofficial	Official	press law, press guidelines, pre-censorship, post-deliberation, blacklist, tax investigation	owner’s hegemony, hierarchy, internal code of ethics, labor-management committee
	Unofficial	censorship through the market, requests for cooperation, providing money or goods, utilizing news beat and common practices, media criticism	organizational culture, personnel appointments, self-censorship

Figure 2 Types of press control (Source: Cho, 2017, p. 47)

Cho (2017, p. 47) argued that a polity known to ensure press freedom avoids external and official control methods, which are prominent and also may face strong resistance from press circles—due to actions taken directly by governments—meanwhile, it prefers internal and unofficial control methods that are well hidden and have a relatively high effect of control—on the pretext of profession or organization, in other words, “to make sure that orders are carried out without any explicit ones”.

In summary, the degrees of control influence (direct/indirect), the methods of control procedure (official/unofficial), and the subjects and flow/path of control implementation (by the government from the outside/by proxy act of a media company(management) from the inside) can be criteria for classifying types of governmental press control.

2.3.2.3 Concept of ‘Press Regulation’

US journalism scholar William L. Rivers and communications scholar Wilbur Schramm (1969, p. 54) said, “We speak of ‘freedom,’ but it is never absolute. Almost any mass media system is subject to certain basic statutory controls.” And they added that among legislation underlying such controls, there are a law designed to protect individuals or groups against defamation, a copyright law to protect authors and publishers, a basic statute designed to preserve the common standard of decency and morality, and another basic statute to protect the state against treasonable and seditious utterances (Rivers, & Schramm, 1969, p. 55; Asante, 1997, p. 12).

Schramm especially emphasized that society itself needs to have some control over the press to the extent that the control is not exerted irrationally or heavy-handedly (Ogbondah, 1994, p. 11).

“In general, countries in the Western democratic tradition believe that there should be a minimum of control on the press, and that such control as there is should rest with ownership, which we hope will be enlightened, and with the courts, which we hope will limit their attention to such offenses as libel, obscenity, and sedition presenting a clear and present danger. But we do not imply that society itself exerts no controls on the press, so as to make it fit social needs and standards. And indeed we expect the press to act responsibly in advancing the national welfare, and, in time of crisis, to concern itself especially with the national good.” (Lerner, & Schramm, 1967, p. 9-10)

Independent journalism researcher Clement E. Asante (1997, p. 12) argued that several mass communication scholars and researchers including Rivers and Schramm have posited that every mass media system in the world functions under certain kinds of restraint. And Asante said, no country has absolute press freedom but “we can talk about the levels or degrees of freedom which vary from country to country and are dictated largely by the laws of libel, sedition, obscenity, and invasion of privacy.”

As above-mentioned by the scholars, statutory controls on the press, which are limited, not irrational or heavy-handed, are definitely distinct from the characteristics of press control laid out earlier. On the other hand, that is similar to press control in that it is likely to infringe or restrict press freedom as ‘what governments exert’ based on the law.

In order to embody another term as ‘what governments exert on the press’, when taking a look at those used to define press control in <Figure 1> (gathered by the researcher), the terms ‘regulations’ and ‘official regulatory bodies’ are commensurate with this. In this sense, the specifically mentioned laws of libel/defamation, sedition, obscenity, and invasion of privacy are examples of a means for regulation.

In this way, unlike control, regulations feature the fact that they are enforced under policies and laws by the government that monopolizes the coercive power of laws—that is, law enforcement—and are ostensibly legal.

Jurist Sharon McLaughlin (2013, p. 77) presented three distinct stages that appear when regulations occur—another legal scholar Angela J. Campbell (1999) once described those as three components of regulation³³: (1) the legislative stage, which involves the creation of appropriate rules; (2) the enforcement stage, which refers to the methods adopted to ensure effective implementation of these rules; (3) the adjudication stage, which refers to the processes through which violations of the rules are assessed and appropriate sanctions are imposed. These

³³ Three components of regulation by Campbell (1999, pp. 714-715): (1) legislation, that is, defining appropriate rules; (2) enforcement, such as initiating actions against violators; (3) adjudication, that is, deciding whether a violation has taken place and imposing an appropriate sanction.

components (or stages) are the necessary conditions for imposing regulations, which can therefore be indicators of ‘whether or not this is to establishing and execute regulation’.

As has been mentioned “ostensibly legal”, however, regulation on the press is always warned because it is likely to be abused. In South Africa, even after the advent of democracy, under authoritarian regimes, control of the media (in the name of “national interest”) has moved to self-regulation (in the name of “public interest”) with only changing its outward appearance (Wasserman, & De Beer, 2005, p. 194). Freely elected governments also often violate press freedom through undue legal restrictions.

Miklós Haraszti (2008, p. 14) who was a founder of Hungary’s democracy and free press movement in the 1970s, said many undue limitations seem to seek to “help” enhance journalistic ethics and quality, or “balance” freedom of the press against other important values like state security, social peace, or personal rights, and he criticized them, saying “The road to unnecessary legal interference is paved with good will.” And further, Haraszti pointed out that it can be as oppressive for the press as the dictatorial arbitrariness of the past when such legal restrictions are created or misused with the clear intention of eliminating independent reporting and opinion. Haraszti (2008, pp. 14-15) gave examples of such limitations/restrictions, namely the malicious media laws:

- Discriminate against non-state media outlets, in favour of the still-existing state-owned press, for example in the administration of such spheres as registration, taxation, printing, subscription and distribution;
- Unfairly control the issue of broadcast licences;
- Criminalize dissenting views or unwelcome investigative stories;
- Use a selective approach in the application of criminal or civil provisions protecting personal rights;
- Criminalization of defamation, libel, and insult, instead of handling these offences in civil courts;
- Punishment of “breach of secrecy” by civilians, including journalists, instead of limiting this crime to those who have an official duty to protect the secrets.

In the 21st century, the Anti-Terrorism Acts by the nations of the world, which were created in the wake of the 9/11 Attacks in the United States, 2001, are pointed out as a representative law used to restrict journalists’ ability to access information—surveillance, searches, and demands for disclosure, etc.—rather than public safety. David Banisar (2008, p. 5) who carried out a survey of the effects of counter-terrorism legislation on freedom of the media, emphasized that “The laws are used to prosecute journalists for obtaining information from sources and justify surveillance to identify the sources so that journalists can be prosecuted under secrets acts for violating their duties to keep information secret.”

Other controversial laws in that they could restrict freedom of speech and expression more directly are the German Network Enforcement Act (Netzwerkdurchsetzungsgesetz, NetzDG)³⁴, the French Law against the Manipulation of Information (La loi relative à la lutte contre la manipulation de l’information), and Singapore’s POFMA (Protection from Online Falsehoods and Manipulation Act).

Journalists and critics point out that these laws are comprehensive, general and contain vague wording and therefore, law enforcement (government) is allowed considerable latitude in limiting freedom of expression (Vaswani, 2019; Mahtani, 2020). So, they are concerned that the governments could conduct censorship or encourage self-censorship based on these laws, which could intimidate freedom of expression/press and endanger

³⁴ With the intention to respond to the growing spread of hate crimes and other criminal-related content and the fake news promoting them on social networking services such as Facebook, Twitter and YouTube, the German Federal Ministry of Justice and Consumer Protection (Bundesministerium der Justiz und für Verbraucherschutz) proposed a bill on 14 March 2017 that requires large social networking service businesses to delete illegal postings, including hate speech, fake news, and incitement to terrorism, within 24 hours. The bill went through the federal cabinet’s approval on 5 April 2017 and the Bundestag passed the amended draft on 30 June 2017. Any corporation that neglects illegal postings will be fined up to 50 million euros. The law came into force from January 2018.

In Germany, the penal code, as well as the civil law, criminalizes certain allegations concerning the Nazi regime such as denying the Holocaust, due to Germany’s history. It also outlaws libel, defamation, certain forms of publication and distribution of pornography as well as certain forms of disregard towards state representatives and institutions (MEDIADDEM, 2010, p. 216). See Article 130 mass instigation (3) and (4) of the German Penal Code (Strafgesetzbuch).

democracy by making people refrain from criticizing government policies (Bouhs, & Stegers, 2017; Fiorentino, 2018).

International non-governmental organisations (NGOs), which defend freedom of expression, have maintained that the abuse and misuse of media regulations for political reasons by government authorities are more frequent than the abuse and misuse of media self-regulation by the media industry or journalists themselves and that this is more dangerous (Hulin, 2014, p. 2). Furthermore, the issue has been raised that such regulatory laws tend to quite reflect the tastes of the ruling parliamentary majority (Harazti, 2008, p. 14).

British human rights organization Article 19 (2012) underscored the dangers of government regulation of the press, saying that legislation which seems to ostensibly serve a legitimate goal too often becomes a tool for suppressing critical voices. So, they argued that the need for regulation should be assessed to prevent governments from following their 'legislative instinct' and to make sure that the amount of regulation concerning the media is kept to a minimum.

“Even if a restriction is in accordance with an acceptably clear law and if it is in the service of a legitimate aim, it will still breach the right to freedom of expression unless it is truly necessary for the protection of that legitimate aim.” (Article 19, 2012)

In Hungary as one of the countries where democratic standards are jeopardized, the ruling Fidesz party, which won a landslide victory in the parliamentary election held in April 2010, used its parliamentary majority in December 2010 to pass legislative changes that tighten government control over all media in the country, which was to establish a new national media regulation authority (NMHH) dominated by people loyal to the ruling Fidesz party (Dunai, 2010; Hulin, 2014, p. 8).

The European Commission considered that the 2008-2010 economic crisis in the European Western Balkans—Albania, Bosnia and Herzegovina, Kosovo, the Republic of North Macedonia, Montenegro, and Serbia—had led to a dramatic drop in journalistic professional and ethical standards within the area, and underlined that “against this backdrop and in the absence of effective professional self-regulation in the sector, it is easy for politicians to use the state power—the judiciary—against critical journalism” (Hulin, 2014, p. 3; European Commission, 2014, p. 3).

In this way, government-driven regulations such as policies and laws under historical and social backgrounds, are closely linked to the question of how freedom of the press is guaranteed (Hulin, 2014, p. 5). This is in line with the remark whose Asante (197, p. 12) said earlier that ‘the levels or degrees of press freedom vary from country to country depending on the laws of each country.’ Moreover, at the time and since the establishment of media-related regulations (policy and law), the regulations’ nature and execution methods vary depending on whether governments put weight on ‘freedom of speech/expression’ or ‘social and public responsibility of the press’, that is, depending on whether governments intervene in journalism or respect the autonomy of the press in order to enhance a sense of responsibility of the press (Son, 2013, pp. 56, 80-81).

In conclusion, regulation of the press corresponds to ostensibly legitimate control that is enforced under policies and laws by the government, which monopolizes law enforcement, with the aim of meeting social needs and standards. And the regulations (laws) which ostensibly serve a legitimate goal have room for abuse directly or indirectly by the government or political forces for purposes of weakening the independence and critical ability of the press, and in practice—even though there are differences in degree and method—they often threaten and violate press freedom like controlling. In other words, depending on the regulatory body’s intention—whether it intends to protect the public interests and maintain social order or to block criticism from the press against the power—the regulation’s consequences may vary. For this reason, it is hard to draw a clear line of demarcation between regulation and control until the inherent intentions of the regulatory body or the results of the regulatory implementation are identified.

Meanwhile, socio-legal scholar Bronwen Morgan and jurist Karen Yeung (2007, p. 3) said, regulation is a phenomenon that is notoriously difficult to define with clarity and precision, as its meaning and the scope of its

inquiry are unsettled and contested due to the political and ideological battles. That said, however, they defined regulation from a legal perspective as follows.

“At their narrowest, definitions of regulation tend to centre on deliberate attempts by the state to influence socially valuable behaviour which may have adverse side-effects by establishing, monitoring and enforcing legal rules. At its broadest, regulation is seen as encompassing all forms of social control, whether intentional or not, and whether imposed by the state or other social institutions. ... From a traditional legal perspective, one might think of a statute promulgated by a sovereign legislature as the paradigmatic form of regulation.” (Morgan, & Yeung, 2007, pp. 3-4)

Like this, the meaning and scope of regulation are not defined, so it's not only controversial. According to a report published in 2006 by the European Commission's Directorate-General for Information Society and Media, the understanding and concept of the term 'regulation' show differences between continents.

“In American legal political studies³⁵, regulation means a specific form of state influence on economic processes, whereas in Europe³⁶ the term is generally understood as being used generically to describe means of achieving public policy objectives.” (Schulz et al., 2006, p. 11)

Furthermore, the term is not used in a consistent way in Europe and its meaning is altering; therefore, the understanding of regulation changes with the transformation of democracy, policies and politics, the report states (Schulz et al., 2006, p. 11; McLaughlin, 2013, p. 77). This shows, in another dimension, the ambiguity (elusiveness) of the concept of press regulation itself, which is a common feature with press control.

³⁵ US jurists Mike Feintuck and Mike Varney (2006, p. 55) said, the justification for regulation becomes apparent when the threats of monopoly and of increasing commercialism are clear. Peter Dahlgren (1995, p. 15), a media sociologist who has been educated in the US, described the timing when media regulation is needed, tying in the economic situation: “The state has less to say about broadcasting specifically, as it allows television and radio to be run by private concerns, but must instead tackle the overall structural media situation, such as issues of concentration and cross-ownership. In a sense, what is needed is re-regulation, to counteract the negative aspects of market forces and to optimize the positive role they can play.”

³⁶ Swiss media scholar Manuel Puppis (2015, p. 1) argued that media regulation is closely related to media policy and media governance, all of which are very important to political communication. He defined media regulation as follows: “Media regulation refers to the formulation and enforcement of rules concerning mediated communication that are deployed on media organizations to achieve specified policy goals. Going beyond simply maintaining economic competition, political or societal media regulation aims at creating a media system that offers diversity and quality of content to citizens.”

UK media scholar Des Freedman (2013, pp. 13, 14) who has studied media policymaking and regulation, explained in terms of the process: “If media policy suggests the broader field where a variety of ideas and assumptions about desirable structure and behaviour circulate, then regulation points to the specific institutional mechanisms for realizing these aims. ... Media regulation focuses on the operation of specific, often legally binding, tools that are deployed on the media to achieve established policy goals.”

UK jurist Sharon McLaughlin (2013, p. 77) whose research focuses on communications law and policy, also mentioned, “While the concept of regulation is difficult to delineate in any concrete manner, it is generally understood—at least from a European perspective—to apply to various means of achieving public policy objectives.”

2.3.2.3.1 Background of the Idea for Press Regulation: Emergence of the Doctrine of Social Responsibility

The first organization to officially discuss the needs and practical methods of ‘press regulation’ in a modern sense—Of course, there have been questions raised about free press and freedom of the press from the past³⁷—is considered the Commission on Freedom of the Press in the US (so-called ‘Hutchins Commission’) that which held its first meeting on December 15, 1943 (Siebert, Peterson, & Schramm, 1956, p. 75; Ritter, & Leibowitz, 1974, p. 852; Bardoel, & Brants, 2003, p. 169; Pickard, 2010, p. 404-405; McQuail, 2010, p. 170-171; Luo, 2020).

The Commission on Freedom of the Press saw that under the then media system seeking the principle of *laissez-faire*, there was a growing negative assessment of the media in American society due to ownership concentration, excessive commercialism and prevalent irresponsible reporting (Son, 2013, p. 58; Shedden, 2015). The Commission stressed the responsibility of the media, saying that if mass communication agencies as greatly centralized private power are irresponsible, even the First Amendment cannot protect their freedom from government control. Thus, it initially had strong prescriptions, namely government intervention and regulation, in mind (Commission on Freedom of the Press, 1947, p. 80; Pickard, 2010 p. 392; Metzgar, & Hornaday, 2013, p. 256; Son, 2013, p. 59).

Through a total of 17 meetings (McIntyre, 1987, p. 140; Christians, & Nordenstreng, 2004, p. 3), however, the Commission (1947, p. 132) judged that because freedom of the press is a condition of its veracity and the basis of good Faith for historical records, “A free press is not a passing goal of human society; it is a necessary goal.” So, it concluded that without intruding on press activities, a government should act to improve the conditions under which they take place so that the public interest is better served—in other words, government intervention should be very limited (Commission on Freedom of the Press, 1947, p. 127).

In this sense, the Commission laid out the matters of social responsibility that the press should carry out, instead of government intervention (Son, 2013, p. 60). The report *A Free and Responsible Press*, which they released after four years of discussion, contained core tasks for the press (Commission on Freedom of the Press, 1947, pp. 90-96). US media historian Victor Pickard (2010, p. 403) summarized these in three keywords: provide diverse information; enable self-governance; and watchdog the government.

“An over-all social responsibility for the quality of press service to the citizen cannot be escaped; the community cannot wholly delegate to any other agency the ultimate responsibility for a function in which its own existence as a free society may be at stake.” (Commission on Freedom of the Press, 1947, p. 126)

The Commission stressed that the only way for the press to remain free was to be responsible and called for creation of an independent agency to appraise and report annually on press performance (Ritter, & Leibowitz, 1974, p. 852). After all, apart from the media industry’s reaction and assessment of the report³⁸, the most

³⁷ Korean journalism scholar Son Tae-gyu (2013, p. 56) argues that government interference in and control of the media, such as pre-censorship and permission system, have been virtually taboo under the idea of freedom of speech stemming from the Enlightenment in the Middle Ages, but that a new trend began to emerge in the early 20th century. He cited a 1919 ruling by the US Supreme Court (a written judgment by justice Oliver Wendell Holmes, Jr.), which is that if speech is intended to result in a crime and there is a clear and present danger that it actually will result in a crime, the government can restrict freedom of speech and expression (Supreme Court of the United States, 1919). Son (2013, p. 56) viewed this as a paradigm shift from the principle of *laissez-faire* that has vilified government interference in and regulation of the ‘watchdog’ press and analyzed that this trend led to discussions on social responsibility of a free press and regulation of it.

US media and constitutional scholar Stephen Bates (2018), who has studied the 1940s Commission on Freedom of the Press and the inside facts about it, argued that as fascism advanced in Europe, the panels had a palpable sense that liberties were imperilled at home, which led to the discussion on a free press and the need for pre-emptive self-regulation (Luo, 2020).

US media historian Victor Pickard (2010, p. 400) pointed to the social background as the cause such as people’s perception through the Second World War that media have tremendous power under totalitarian regimes, and uneasiness felt by media elites from the government’s having sought to mobilize media during wartime. US communication scholar Jerilyn S. McIntyre (1987, p. 141) also saw that the commission had concerned the possibility of media abuse henceforth due to things that had happened in various totalitarian regimes before and during the war.

³⁸ Immediately after media outlets reported on the Hutchins Commission’s report *A Free and Responsible Press* on March 27, 1947, the media industry’s reaction and assessment of the report were not so favorable, and the detractors far outnumbered

significant outcome from the Commission is that the Commission publicized the principle of social responsibility in journalism and made it an issue, and proposed self-regulation of the press (Pickard, 2010, p. 404; Son, 2013, p. 60). On the other hand, Pickard (2010, p. 394) rated the fact that the Commission articulated the possibility of state regulation on the public sphere laid “the groundwork for seeing a *positive* role for government—an interventionary role—to provide enabling structures for a healthy public sphere, such as open and diverse media institutions.”

The British Royal Commission on the Press³⁹, which was influenced by the US Commission on Freedom of the Press and held its first meeting on April 30, 1947, articulated the nature of the press and the reason for its existence as follows in a report to Parliament in June 1949 and stipulated this as “public accountability” of the press (Great Britain. Royal Commission on the Press, 1949, p. 174; Cryle, 2004, p. 7; Son, 2013; p. 62).

“The Press is not purely an agency for the political education of the public, much though democratic society may need such an agency. On the other hand, it cannot be considered purely as an industry: the inescapable fact that it is the main source of information, discussion, and advocacy imposes upon it responsibilities greater than those resting on an industry which does not deal in information and ideas.” (Great Britain. Royal Commission on the Press, 1949, p. 105)

In this way, the Royal Commission on the Press emphasized that the press should be free above all else in order to recognize the responsibility for the people and to function properly.

“If the Press is not aware of its responsibility to the public it cannot perform its functions adequately; but if it is not free it cannot perform them at all. Consequently the amount of direct pressure which society can afford to put on the Press is very limited. ... Therefore, it is preferable to seek the means of maintaining the proper relationship between the Press and society not in Government action but in the Press itself.” (Great Britain. Royal Commission on the Press, 1949, p. 165)

As a result, the Commission proposed self-regulation by the press itself through the establishment of a “General Council of the Press”⁴⁰, which would act as a watchdog on irresponsible journalism and foster integrity and a sense of responsibility for the public and contribute to freedom and prestige of the press by speaking with a unified voice on the industry’s behalf in dealings with the governments (power) (Great Britain. Royal Commission on the Press, 1949, pp. 164-174; Cryle, 2004, p. 7; Son, 2013; p. 62).

The Commission’s proposal was put into practice with the foundation of the Press Council in 1953 although the British newspaper industry reacted rather slowly to the 1949 recommendations of the Commission (Cryle, 2004, p. 7).

In an interim conclusion, the concepts of ‘social responsibility’ and ‘public responsibility’, which were shaped by the US Commission on Freedom of the Press and the British Royal Commission on the Press raising the issue of

and outmaneuvered supporters (Nieman Reports, 1947, p. 12; Pickard, 2010, p. 404; Shedden, 2015).

³⁹ After the Second World War, there were concerns in Britain that problems such as diversity of public opinion threatened by the concentration of newspaper ownership following the sharp decline in newspaper and magazine subscriptions and a decline in the level of journalism caused by inaccuracy and political bias of coverage would endanger not only freedom of the press but ultimately the welfare of the country. Amid such concerns, the British Royal Commission on the Press was a private investigative body formed by Parliament to grasp the reality of the media industry (eg. the finance, control, management and ownership of the press). Therefore, the purpose of the British Royal Commission’s activities and its approach to enhancing press freedom were different from that of the US Commission—which focused on solving the problems and side effects of press reporting (Cryle, 2004, p. 7; Irving, 2012; Son, 2013; pp. 62-63).

⁴⁰ The British Royal Commission on the Press (1949, pp. 174) proposed to establish the General Council of the Press and concurrently presented its three aims for enhancing the autonomy of the press.

- To safeguard the freedom of the Press
- To encourage the growth of the sense of public responsibility and public service among all engaged in the profession of journalism—that is, in the editorial production of newspapers—whether as directors, editors, or other journalists
- To further the efficiency of the profession and the well-being of those who practise it.

freedom and trust of the press, all emphasized the responsibility of the press. And the ultimate method chosen to enhance it was self-regulation by the press itself (Son, 2013, p. 56).

Since then, this responsibility of the press has been commonly recognized as being widely introduced through the 'social responsibility theory' by Theodore Peterson included in *Four Theories of the Press* (Siebert, Peterson, & Schramm, 1956, p. 75; Bardoel, & Brants, 2003, p. 169). According to the theory of social responsibility, the press can meet the needs of society only when they enjoy freedom and at the same time recognize their own social responsibility⁴¹ and take it as the basis of their operational policies. If the press does not fulfil the responsibility, some other agencies must see whether the essential functions of mass communication are carried out properly (Siebert, Peterson, & Schramm, 1956, p. 74).

However, authoritarian governments (dictatorial and military regimes) emerging in the 20th century, in the name of maintaining public order and security, and pursuing public interest, put weight on social responsibility rather than freedom of the press and enforced government-led regulations by choosing interference and intervention to increase that responsibility (Son, 2013, pp. 56, 80-81). In other words, the governments interpreted the social responsibility of the press at will and abused the following social responsibility theory as an excuse to justify press control.

“Social responsibility theory holds that the government must not merely allow freedom; it must also actively promote it. ... Along with the community, the government, with its virtual monopoly on physical force, is the only agency strong enough to make sure that freedom can operate effectively. When necessary, therefore, the government should act to protect the freedom of its citizens.” (Siebert, Peterson, & Schramm, 1956, p. 95)

US journalism scholar John C. Merrill (1974, pp. 85-86) argued that the concept of social responsibility, which emerged in the 1930s in the United States, and the authoritarian press lie in the same root and “the authorities who would guide and control the authoritarian press used the very same rationale of social responsibility to justify their practices”. Netherland media scholars Jo Bardoel and Kees Brants (2003, p. 169) mentioned that since the 1970s when mass media spread, governments have interfered in public broadcasting and legitimized quite ritualistic procedures and prescriptive regulations to give media organizations financial prerogatives and specific roles ‘in the public interest’.

In conclusion, the approach to regulation on the press was initiated from self-regulation through voluntary discussion in the media arena. Since then, some of the concept of social responsibility and its theory have been abused by authoritarian governments and hence, government was added as a regulatory body and government-led regulations have been implemented.

⁴¹ Netherland media scholars Jo Bardoel and Kees Brants (2003, pp. 168-169) described the meanings of 21st century ‘social responsibility’ of the press in three respects:

- In terms of content, a notion of social responsibility refers to provision of social or ‘merit’ information that is accurate, diverse and of high quality, not merely a commodity;
- In terms of media function, it means allowing sufficient forums for the expression of opinions and enabling the public to fulfil its role as citizens;
- In terms of media organizations’ status, media ownership is a public trust itself in which content producers should be independent from both state and market forces but still accountable to the public to avoid power without responsibility.

2.3.2.3.2 Types of Press Regulation

Based on the above historical background, press regulation is generally classified into three broad types by many scholars: Self-regulation, Command-and-control(state/government) regulation, Co-regulation (Black, 1996, pp. 26-27; Gunningham, & Rees, 1997, p. 366; Just, & Latzer, 2004, p. 44; Prosser, 2008, p. 99; Puppis, 2010, p. 139; Yoon, 2012, p. 203; Jędrzejewski, 2013, p. 104; McLaughlin, 2013, pp. 78-86; Furnémont, & Smokvina, 2017, pp. 17-19; Choi, & Youn, 2019, pp. 134-139).

a. Self-regulation

Firstly, as for self-regulation, genuine self-regulation implies a regulation implemented by nonstate actors and pursued by the industry itself (Puppis, 2010, p. 139; Furnémont, & Smokvina, 2017, p. 18).

In a more practical aspect, British jurist Julia Black (1996, p. 27) defined self-regulation: “Self-regulation describes the situation of a group of persons or bodies, acting together, performing a regulatory function in respect of themselves and others who accept their authority.” Black said the term ‘Self’ does not imply that it has no particular relationship with the state (government) and presented four detailed types based on the degree of government role/influence in the legal aspect (Black, 1996, p. 27; Choi, & Youn, 2019, p. 136):

- Mandated self-regulation, in which a collective group (industry or profession) is required or designated by the government to formulate and enforce norms within a framework defined by the government;
- Sanctioned self-regulation, in which the collective group itself formulates the regulation, which is then subjected to government approval;
- Coerced self-regulation, in which the industry itself formulates and imposes regulation but in response to threats by the government that if it does not, the government will impose statutory regulation;
- Voluntary self-regulation, where there is no active state involvement, direct or indirect, in promoting or mandating self-regulation.

The specific types in self-regulation may vary depending on its relationship with the state, the nature of its participants, its structure, its enforcement, and its rule type (Black, 1996, pp. 27-28).

Self-regulatory associations within the industry for self-regulation combine the governmental function of regulation with the institutional structure—often legal structure—and interests of a private body. The associations impose conditions of membership and expulsion, they formulate their own rules and impose their own discipline (Black, 1996, p. 28). In Europe, the names are slightly different, but there are ‘Independent Press Councils’ in most countries⁴², which fulfil functions to investigate and deal with public complaints about press reports based on their own Code of Practice or Ethics. Through this, they ultimately aim to raise trust in the press and protect freedom of the press (Lee, & Yun, 2010, p. 116).

Representative organizations that implement ‘Voluntary self-regulation’ include the British Independent Press Standards Organisation (IPSO)—which was established in September 2014 following the windup of the Press Complaints Commission (PCC)—and the German Press Council (Deutscher Presserat)⁴³ being in charge of deliberating complaints and remediating damages against printed media, publications and internet media (Deutscher Presserat, n.d.; Baum, 2010, p. 192). On the other hand, the Korean Press Arbitration Commission⁴⁴,

⁴² Cf. Alliance of Independent Press Councils of Europe (AIPCE)

URL: <https://www.presscouncils.eu/members>

⁴³ The German Press Council is an institution of voluntary self-regulation established in 1956 to the effect that the press should be controlled from within the media community, not from the state—i.e., Self-control instead of government interventions/participations (Baum, 2010, p. 186; Deutscher Presserat, n.d.; Bundeszentrale für politische Bildung, 2016). However, the Press Council’s sanction measures are not legally binding, which serves as an excuse for critics to question the effectiveness of journalistic self-control in principle (Baum, 2010, p. 192; Lee, 2018, p. 55).

⁴⁴ The Korean Press Arbitration Commission is a statutory institution created in 1981 on the basis of an ‘evil law (Basic Law of the Press, Enforcement on Dec. 31, 1980 - Abolition on Nov. 28, 1987)’ enacted for de facto control of the press under the authoritarian government inherently. This resulted from the then authoritarian regime’s emphasis on ‘social and public responsibility’ of the press rather than on freedom of expression through constitutional amendment—Article 20, Clause 2 of

which conducts similar functions to the British and German Commissions—such as deliberation, mediation, and arbitration in disputes originating from press reports by print, broadcasting and internet media—was established by the relevant law and is a quasi-judicial administrative organ with a collegiate system under the Ministry of Culture, Sports and Tourism (Korea Ministry of Government Legislation, 2006; Yang, & Kim, 2011, p. 69). Thus, the Korean Commission implements de facto ‘Command-and-control regulation’ (Yoon, 2012, p. 203).

Given the history of each press regulatory institution in Germany and Korea, it can be seen that its nature and goal may vary depending on political and social situations of the corresponding state at the time of its establishment and the will of press circles to protect press freedom.

b. Command-and-control regulation

Command-and-control(state/government) regulation is a type of active government intervention that is deeply related to ‘Positive policy’ containing the government’s willingness to try to shape or design the structures and practices of the media (Garnham, 1998, p. 210; Freedman, 2013, p. 9), and thus it contrasts with self-regulation. This is known as a ‘classical’ or ‘traditional’ regulation and involves the state’s promulgation of legal rules prohibiting specified conduct, followed by coercive sanctions (either civil or criminal in nature) if the prohibition is violated (Morgan, & Yeung, 2007, p. 80). Thus, the best example of command-and-control regulation is the legislation/statute and is enforced by the state(government) (McLaughlin, 2013, p. 78). It is also called administrative regulation in that it is a government’s administrative measure against the private sector (Choi, & Yoon, 2019, p. 134). Command-and-control regulation on the media is generally divided into two, structural(ownership) regulation and content regulation (Franklin et al., 2005, p. 231; Feintuck, & Varney, 2006, p. 127).

Structural(ownership) regulation—generally including ‘behavioral regulation’ that serves to limit how possessed property can be used in relation to its impact on actual or potential competitors—refers to limits on the extent of that which can be owned within any market by any one corporate entity, and regulation of media ownership has traditionally taken place at the national level (Feintuck, & Varney, 2006, pp. 21, 68). For example, restricting the growth of an organization in one media sector based on the number of companies or market share in terms of turnover/audience share (Feintuck, & Varney, 2006, p. 127); administratively, in transitional countries undergoing transformation from authoritarianism to democracy, authorizing only media outlets in favour of the authorities with the manipulation of regulatory frameworks (Hulin, 2014, p. 2); and unfairly controlling issue of broadcasting licences (Haraszti, 2008, p. 14).

Content regulation is literally one restricting the publication and distribution of allegedly harmful content (Bonnici, & De Vey Mestdagh, 2005, p. 136). When faced with the task of legislation for the regulation of content, it is known that governments tend to lean towards censorship (Lievens, 2007, pp. 318, 321; McLaughlin, 2013, p. 80). This includes ‘laws against fake news’ from around the world, including the French Law against the Manipulation of Information (La loi relative à la lutte contre la manipulation de l’information) and Singapore’s POFMA (Protection from Online Falsehoods and Manipulation Act).

c. Co-regulation

Co-regulation is known to have emerged as the trust in self-regulation, which was hailed as the most efficient way of regulating information and communication sector, is steadily declining and governments are tightening the reins in order to regain some control over the regulatory process in fields where self-regulation has not been very efficient (Lievens, Dumortier, & Ryan, 2006, p. 103). In other words, co-regulation is a kind of alternative mode of regulation to self-regulation (Latzer, Just, & Saurwein, 2013, p. 37; Furnémont, & Smokvina, 2017, p. 18). However, the concept has not yet been clearly defined⁴⁵ and there are many different interpretations of the

the 1980 constitution, “Neither speech nor the press shall violate the honor or rights of other persons nor undermine public morals or social ethics.”—and its choice to actively intervene as a way to increase the responsibility of the press (Son, 2013, pp. 74-75; Ji, 2019, pp. 49-50).

⁴⁵ At the end of 2003, the European Parliament and others agreed on the definition of ‘Co-Regulation’ as follows for better

meaning—such as two-tiered regulation, regulated self-regulation, audited self-regulation, industry self-regulation with some oversight by government, etc. (Schulz, & Held, 2002, p. A-4; Lievens, Dumortier, & Ryan, 2006, pp. 103-107; Puppis, 2010, p. 139; McLaughlin, 2013, pp. 77, 84-85). Nevertheless, it is clear that the prefix ‘Co-’ means government involvement as well as media circles/industries in the regulatory process and therefore co-regulation is self-regulation with public oversight or ratified by the state and with a legal basis (Just, & Latzer, 2004, p. 44).

It is rated that co-regulation may be the optimal regulatory solution by taking the respective merits of command-and-control regulation and self-regulation (Sinclair, 1997, p. 533) and further, it can enhance regulatory reliability and efficiency with the participation of stakeholders and utilization of autonomous private organizations; however, it has not yet been widely generalized due to problems with the design of regulatory systems that meet all the needs of interested parties (Yoon, 2012, p. 204). On the other hand, in Australia, a combination of state regulation and self-regulation was established through the Broadcasting Services Act of 1992 and the Telecommunications Act of 1997 and then co-regulation has developed stage by stage (Schulz, & Held, 2002, p. B-1; Just, & Latzer, 2004, p. 43). So, Australia is called a role model country for co-regulation, and the Australian Communications and Media Authority (ACMA), an independent statutory authority, is carrying out co-regulation with the industry in the field of broadcasting and telecommunications⁴⁶ (Yoon, 2012, p. 204).

In conclusion, as a result of arranging the three types of press regulation, no matter how self-regulation is mentioned—it exists just in a theoretical approach—there is no pure self-regulation in the real world and besides, even in implementing co-regulation, if the fulfillment results are not satisfactory, the proportion of government intervention may increase⁴⁷. Therefore, the possibility of governments’ increasing the role or influence for press

law-making.

“18. Co-regulation means the mechanism whereby a Community legislative act entrusts the attainment of the objectives defined by the legislative authority to parties which are recognised in the field (such as economic operators, the social partners, non-governmental organisations, or associations).” (European Parliament, Council, & Commission, 2003, p. 3)

However, the form and meaning of the term used by European countries and scholars still differ somewhat. Furthermore, scholars point out that options of regulatory policies are lessened due to dichotomy to choose between the two regulations located at both extremes theoretically, and narrow regulatory stereotypes; they stress that there is no clear dichotomy between self-regulation on the one hand and government regulation on the other (Sinclair, 1997, p. 531; Gunningham, & Rees, 1997, p. 366).

In this sense, Australian policy scholar Darren Sinclair (1997, p. 532) said, “It may be more accurate and productive to envisage the range of policy instruments as being on a regulatory continuum, with idealized forms of ‘pure’ self-regulation and ‘strict’ command and control regulation at opposing ends.” UK legal scholar Tony Prosser (2008, p. 99) also argued that in the real world, there is no such thing as self-regulation; nor is there any such thing as its perceived opposite, command and control regulation, and that “Regulatory regimes will be comprised of a cocktail of different regulatory approaches. The developing concept of co-regulation is likely to be more productive.”

⁴⁶ Australia’s broadcasting and telecommunications regulatory policies primarily encourage autonomous regulation so that the industries can voluntarily establish industry codes to regulate what they need. The areas not covered with the industry codes are supplemented through industry standards or statutes created by the Australian Communications and Media Authority (Yoon, 2012, p. 204). So, in the field of broadcasting and telecommunications, regulatory enforcement is in three stages. In the first stage, a business operator is responsible for enforcement of regulations. If the operator’s enforcement results are not satisfactory, the next step is that the industry’s self-regulatory body demands compliance with regulations and enforces them. If a decision by the self-regulatory body is not satisfactory or there is a problem with compliance and fulfillment of a decision made by the self-regulatory body, the regulatory authority or judicial agency will be the last to enforce regulations (Lee et al., 2011, p. 154).

However, based on the judgment that industry co-regulation is recently not effective in expediting complaints from customers in the telecommunications area, the ACMA is seeking to put in place rules in order to quickly deal with non-compliance (Australian Communications and Media Authority, 2018).

⁴⁷ According to clause 7, Article 4 of the Audiovisual Media Services Directive (AVMSD), European Parliament and Council has recommended that member states shall encourage self- and co-regulation at national level to the extent permitted by their legal systems. On the other hand, it stipulated that the possibility of government intervention (i.e. government regulation) was open.

• “Where co-regulation fails to deliver the desired results or where certain private actors do not commit to the agreed rules, it will always remain possible for public authorities to intervene by establishing the specific rules needed.” (European Commission, 2001, p. 21)

regulation remains always. In terms of media policy, British media scholar Des Friedman (2013, p. 10) said that with the exception of the First Amendment to the US Constitution, the classic statement of ‘Negative policy’—which is the refusal to intervene in the face of public pressure for intervention (Garnham, 1998, pp. 210-211)—non-intervention is relatively rare even in those states that express a commitment to ‘small government’ and ‘open markets’.

Meanwhile, based on the entirety of forms of collective rules that encompasses three regulations—staatliche Medienregulierung, Selbst- und Co-Regulierung—and aims to organize media systems, that is to say, the concept of ‘Media Governance’⁴⁸ that means the whole regulatory structure (Puppis, 2010, p. 138), European media scholars Patrick Donges and Manuel Puppis (2019, p. 85) illustrated a horizontal/vertical extension of government’s media regulation with a schema.

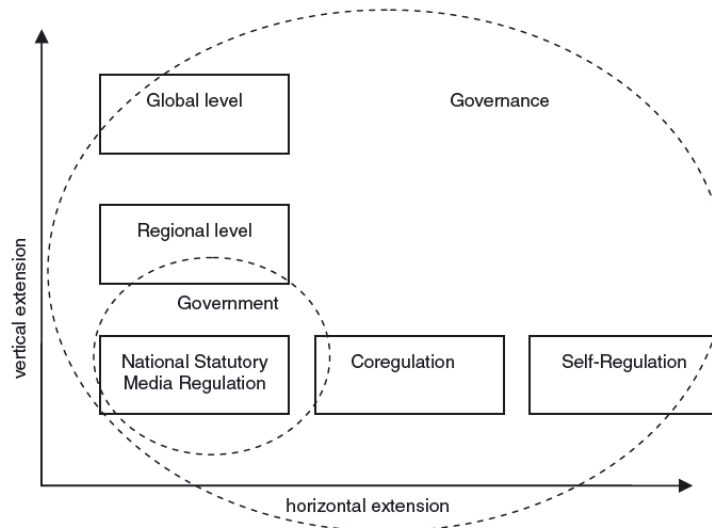


Figure 3 Media governance as horizontal and vertical extension of government
(Source: Puppis, 2010, p. 140; Donges, & Puppis, 2019, p. 85)

Considering that regulation in Europe is a means of achieving public policy objectives or a tool for realizing policy (Puppis, 2015, p. 1), governments cover self- and co-regulation through statutory regulations under regulatory policy and therefore the horizontal extension of government regulation may arise (Puppis, 2010, p. 139).

In addition, global media governance built on international cooperation of nation-states—for instance, international governmental organizations like WTO and ICANN or intergovernmental agencies organized around the United Nations like UNESCO and WIPO (Puppis, 2010, p. 140; Freedman, 2013, p. 13)—supplements domestic statutory regulation (das nationalstaatliche Regieren) while at the same time leading to vertical extension of government regulation. Particularly in Europe, regional integration following the formation of the European Union gave rise to an entirely new level of governance (Puppis, 2010, p. 140; Donges, & Puppis, 2019, p. 86).

• “Co-regulation should allow for the possibility of State intervention in the event of its objectives not being met.” (European Parliament, & Council, 2007, p. 31; 2010, p. 5; Directorate-General for Communications Networks, Content and Technology, 2016, p. 32)

⁴⁸ ‘Media Governance’ conceptual definitions frequently quoted are:

• “In contemporary usage, ‘governance’ describes systems and processes of control that are decentralized and multiple, involving networks of contacts, private as well as public agencies and activities, internal as well as external mechanisms, informal as well as formal pressures, incentives, and sanctions. It covers all means by which the mass media are limited, directed, encouraged, managed, or called to account, ranging from the most binding law to the most resistible of pressures and self-chosen disciplines.” (McQuail, 2003, p. 91)

• “Media governance refers to the sum total of mechanisms, both formal and informal, national and supranational, centralized and dispersed, that aim to organize media systems according to the resolution of media policy debates.” (Freedman, 2013, p. 14)

Even though media regulation is said to be a means of media policy that attempts to realize various political, economic and socio-cultural goals—because there is no uniform European conception of regulation yet and it has inherently ambiguous two-sidedness (Schulz et al., 2006, p. 11; McLaughlin, 2013, p. 77; Freedman, 2013, p. 9; Burri, 2015, pp. 62-63)—the possibilities of government involvement in media regulation and consequent infringement of press freedom (i.e. press control) always exist, it can be said.

2.3.2.4 Concept of ‘Influence over the Press’: Extensively during Communication

According to US journalism scholar John C. Nerone (1995, p. 176), classical liberalism—tightly linked to the development of the nation-state—assumed that the interdependence between the press and the nation-state is necessary and important.

That is to say, freedom of the press is justified because it serves the governmental form (democracy) of the nation-state; instead of that, the press plays a role as an additional arm of the government, the so-called “fourth estate” and at the same time, as the “watchdog” of the nation-state. The media reports governmental requirements through newspapers and broadcasts as the primary conduit for information flows between the government and the people so that the government can communicate with the public. Thus, the nation-state is the primary concern and news source for the press, and constraints on communication activities are most likely to come from the nation-state.

Today, scholars in the field of public/political communication conceptualize the above-stated content with terms of ‘Government news management’, ‘Government communication’ and ‘Political public communication’⁴⁹ and define as follows.

“(Government) news management can be conceptualized as a strategic variant of public information. Governments manage communication in order to influence public opinion by controlling the news media agenda. This is a top-down process of communication: the media are the means and targets, while the strategies are determined by the political objectives of the specific actor.” (Pfetsch, 1998, p. 89)

“Government communication can be thought of as a generic name for a wide variety of a specific type or category of governing instruments, the use of government informational resources to influence and direct policy actions through the provision or withholding of ‘information’ or ‘knowledge’ from societal actors.” (Howlett, 2009, p. 24)

“The main goal of political PR is the use of media outlets to communicate specific political views, solutions and interpretations of issues in the hope of garnering public support for political policies or campaigns.” (Froehlich, & Rüdiger, 2006, p. 18)

German political communication scholar Barbara Pfetsch (1998, p. 89) said that the government’s practices of news management ostensibly aim to inform the public about its policies and legitimate its decisions, however, the prime motive can be seen in the executive’s political goals with respect to the political competition and the creation of popular consent. And this influences the chances of retaining or increasing political power, Pfetsch argued.

In this sense, the government’s issue management—communication or public relations—strategy is firstly focused on encouraging favorable media coverage to shape and increase public trust in government activities, and the

⁴⁹ When communication scholars discuss communication or political PR by governments, the terms (nomenclature) defining them vary (Howlett, 2009, p. 24). For example, “administrative communication”, “government communication”, “communication of public institutions”, “government public relations” and “political government public relations”, etc. Communication scholars María José Canel and Vilma Luoma-aho (2018, pp. 30-33) use the term “Public sector communication” that covers them all.

However, in all definitions of the terms, for each purpose, it can be found that media outlets are commonly used as a means.

primary channels chosen by government organizations to reach their publics are established news media⁵⁰ (Liu, Horsley, & Yang, 2012, p. 600; Canel, & Sanders, 2015, p. 450).

The government routinized press conferences and briefings, which provide the portfolio for the proactive measures of news management and serve as the foundation to maintain the “working relationship” even if both groups, public information workers and journalists, disagree with professional norms and political objectives (Pfetsch, 1998, p. 74). The governments have also strived to increase the chances of securing positive news coverage and to bring about more favorable media coverage through adequate communication budget spending (Liu, Horsley, & Yang, 2012).

Public administrators sometimes ask reporters to treat information as deep background and to do so, they are required to have constructive relationships with reporters and editors rather than destructive ones (Garnett, 1992, pp. 187, 193). In particular, elected officials and government employees are well aware of the power of mass media to persuade the public. So they have made an effort to script and sculpt their public appearances—so-called ‘image politics’—more and more, conscious of ubiquitous video cameras (Lee, Neeley, & Stewart, 2011, p. 190).

News media serve as holders of information—eg. a public opinion poll on the approval rating of the head of the government to manage state affairs—that governments need and provide some feedback on government activities; hence, officials actively scan media coverage and keep track of news developments to learn citizen reaction to government services, to assess the consequences of government actions, and to learn what the majority of people and other governments are doing (Garnett, 1992, p. 193; Nerone, 1995, p. 163). Reporters working in the field rely heavily on public administrators and information officers to get information and leads for stories which are newsworthy to them⁵¹ (Garnett, 1992, pp. 187-188).

However, scholars have criticized that the seemingly close relationship between government organizations and media outlets (journalists), namely, the mutual interdependence, systematically constrain the types of information that will actually flow through journalism as a conduit, and the ways in which it is shaped (Nerone, 1995, p. 162-163). For example, Richard V. Ericson, Patricia M. Baranek and Janet B. L. Chan (1989) pointed out that in terms of newsbeat, there exist political transactions over the ‘meaning’ between organizations making news and media organizations.

“News is a product of transactions between journalists and their sources. The primary source of reality for news is not what is displayed or what happens in the real world. The reality of the news is embedded in the nature and types of social relations that develop between journalists and their sources, and in the politics of knowledge that emerges on each specific newsbeat.” (Ericson, Baranek, & Chan, 1989, p. 377).

The government chooses and defines certain issues that will be given salience—of course, agenda-setting is also done by the media—and then framing to mobilize public consensus and spin-control to influence the media

⁵⁰ For communication with the people and policy public relations, government organizations and communicators use standard communications media such as the report, press release, briefing, magazine or newspaper article or editorial, radio, television, speech, hearing, meeting, personal visit, newsletter, electronic mail, video message, rumor—the range of media available has continued to be expanded by modern technologies. And the appropriate medium is selected depending on the message, audience, objectives for communicating, and personal media preferences of message senders. However, considering efficiency in communications and approachability to various publics, the government’s communications and public relations, in fact, are bound to go through mass media, despite being indirect (Garnett, 1992, pp. 56-57, 186; Lee, 2008, pp. 12-13).

⁵¹ James L. Garnett (1992, p. 187), a US scholar who studies government communication, mentioned what reporters consider newsworthy varies but usually includes some or all of the following: (1) something that affects many people or important people—military operations, tax hikes, medical breakthroughs; (2) a story or information that concerns something new—new policy, technology, program, leader; (3) something that involves a departure from the norm—scandal, corruption, bureaucratic snafu, differential treatment, interagency conflict; (4) something of human interest—the plight of certain people or animals, government employees “putting themselves in their clients’ shoes”.

Other scholars in the field of government communication stated that when making decisions about which stories to cover, the media consider news values such as timeliness, relevance to audiences, impact on audiences, proximity to the audiences’ geographical location, rarity, and human interest and that entertainment value also drives media coverage decisions more and more (Liu, Horsley, & Yang, 2012, p. 598).

coverage are followed. Through framing, the meaning and significance of a political message are structured, and spin-control influences the version of the story that the media will feature (Pfetsch, 1998, p. 75).

Government communication officials stress features that are most attractive to target publics or target media, meanwhile, they attempt to cover up features that are deemed to be undesirable from the viewpoint of the government or attempt dethematization to shift attention to other aspects of the problem (Denton, & Woodward, 1990, p. 92; Pfetsch, 2008, p. 76). These spin-controls are regularly observed immediately after major political events, that is, when journalists are eager to interview authoritative sources capable of giving them an instant interpretation of what has happened (Jones, 1995, p. 123). For this reason, journalists who are granted access to public figures such as leading politicians tone down criticism in their questions or reports in case such access should be withdrawn; at that time, self-censorship among journalists occurs—this is a different kind from self-censorship under coercion (Herman, & Chomsky, 1988, preface xii; Franklin et al., 2005, p. 240; Clark, & Grech, 2017, pp. 23-24). According to a survey of journalists on self-censorship, this self-censorship becomes widespread due to the market concentration and commercialization amid the increasingly competitive media environment (Pew Research Center, 2000).

Moreover, the media not only have relations with the government as an important news source but act as a watchdog over the government as an instrument of democracy, which reflects the long-established liberal conception of the news media as the fourth estate, an independent guardian for civil society and counterbalancing the power of executive, legislative and judiciary branches in government (Liu, Horsley, & Yang, 2012, p. 598; Norris, 2014, p. 525). As such, the media are inclined to focus on negative news or events concerning the government rather than positive ones. In particular, when it comes to covering government organizations, the media are more likely to cover them only when their actions reflect “an everyday issue, novelty or policy conflict/failure” (Downs, 1972, p. 39; Coglianese, & Howard, 1998, p. 48; Kalantari, 2001, p. 880; Liu, Horsley, & Yang, 2012, pp. 598-599). Of course, some point out that the reason for mass media’s negative and cynical approach in interpreting issues lies in their obsession with profits—that is, there is no reason to be positive since negativity sells well (Kalantari, 2001, p. 880). For whatever reason, mass media have a significant impact on the directions of government policy-making and implementation, political issues, and the public credibility to the government (Kalantari, 2001, pp. 877, 880; Gelders et al., 2007, p. 366).

For this reason, public information officers are asked to take initiative and proactive “control of interactions with the media” beyond responding to media coverage in communications and public relations (Lee, Neeley, & Stewart, 2011, pp. 33-34). However, communication strategies such as public relations, spin-control/doctoring, and propaganda, aimed at overcoming media criticism and forming positive public opinion, have rather backfired and frequently engendered distrust in governments (Garnett, 1997, p. 8; Fairbanks, Plowman, & Rawlings, 2007, p. 24).

In conclusion, it can be said that the relationship and communication between the government and the press are in inherent and permanent conflicts. In other words, the government’s issue management—communication or public relation—affects media coverage and vice versa, and a subtle atmosphere of tension is always created between the two since the two need each other because of the goals each pursues but to criticize and sometimes suppress or be in control. In particular, press offices and public information officers’ spin-control/doctoring may hinder the media from doing the normal function and lead to infusing issues and opinions favorable to government organizations, by deliberately paralyzing journalists’ monitoring and criticizing government power.

In order to describe this situation, when looked over the terms used to refer to ‘what governments exert on the press’ in <Figure 1> (gathered by the researcher), the term “influence” corresponds to this as a word that can comprehensively encompass direct or indirect ‘what governments exert’. In this sense, since government influence over the press is extensively exerted in various ways depending on circumstances—that is, officially/unofficially and directly/indirectly—the result may vary depending on intentions of the influencer and circumstances at the time, as with regulation. Therefore, it is hard to differentiate between negative and positive/neutral influences until the inherent intentions of the influencer or the results of the influence are grasped. This ambiguity is a common feature with press regulation.

2.3.2.4.1 Relationships formed by Mutual Influences

It is deemed that since governments influence the press and vice versa, distinctive relationships between the two are formed.

The definition of such characteristic relationships stemmed from German journalism and communication studies, which viewed the relationship between politics and the press from the perspective of 'power' and sought to figure out their relationship based on the degree of media autonomy (Medienautonomie)⁵² while focusing on which of the two systems exert more influence on each other (Choi, 1995, p. 10; 1996, p. 8).

Choi Yong-joo (1995, pp. 10-23; 1996, pp. 8-14), a Korean political communication scholar who studied in Germany, examined and presented four models that characterize the relationship between the press and political power (including the executive) through a theoretical approach⁵³, which are widely quoted until now (Prüß, 1998, pp. 29-34; Choi, 2003, pp. 100-103; Dölle, 2011, pp. 137-144; Köstler, 2012, pp. 123-126; Whang et al., 2012, pp. 651-652; Yee, 2014, pp. 143-146): 1) Interdependence between politics and media (Interdependenz von Politik und Medien), 2) Dominance of mass media (Übermacht der Massenmedien), 3) Loss of media autonomy (Autonomieverlust der Medien), 4) Super system or Symbiosis (Supersystem oder Symbiose).

The 'Interdependence' model presupposes that political system and media system need each other in terms of function. The media needs information from the political arena about political decision-making process for news production, and the political circles get most of the information about the media's demands and support needed to make political decisions and strengthen legitimacy from the media. In other words, functionally differentiated subsystems depend on each other so that the whole social system can operate effectively (Ronneberger, & Rühl, 1992, pp. 160, 197). At the same time, the media are watching and criticizing the government, and against this, the government tries to influence media through press policies and public relations. In other words, the two sides should maintain a cooperative relationship, understanding each other's positions between incompatible interests (Saxer, 1981, pp. 502, 505; as cited in Prüß, 1998, pp. 29-30)⁵⁴. This model views media autonomy as a prerequisite for interdependence between the media and politics, and has traditionally been considered as a basic model in the relationship between the media and politics (Choi, 1995, p. 11; 1996, pp. 9-10).

⁵² The autonomy of a media system in the sense of independence from a political system means "ein erheblicher autonomer Handlungsspielraum ... wenn es selbst darüber entscheidet, welche Information es aufgreifen, weiterleiten und kritisch bearbeiten wird" (Ronneberger, 1978, p. 220) or "die Möglichkeit, alle mit Produktion und Verteilung publizistischer Aussagen verbundenen Entscheidungen selbst und unabhängig zu treffen" (Holtz-Bacha, 1990, p. 27).

⁵³ This theoretical approach was based on the systems theory in sociology, especially the theory of social systems (Theorie sozialer Systeme) from German sociologist Niklas Luhmann (1995). Luhmann's theory provides an analysis frame needed to describe the mechanism in which government and the press, each of which consists of separate units (systems), and interact while performing independent functions (Luhmann, 1995, foreword xix, p. 13; Jung, 2004, p. 118).

From Luhmann's view, 'politics' and 'government' are functionally and analytically differentiated but both belong to a political system, and the government with political power accounts for a significant portion in the system (Brans, & Rossbach, 1997, pp. 428, 431; Jung, 2004, p. 126). Besides, German sociologist Jürgen Habermas (2006, p. 415) said, "The center of the political system consists of the familiar institutions such as parliaments, courts, administrative agencies, and government." The primary goal in a struggle among actors within this political system is to acquire and to hold power (Brans, & Rossbach, 1997, p. 428).

As a subsystem of the whole social system, the press has the meaning as a system reference by criticizing and watching government power and concurrently interacting with the government (Jung, 2004, p. 126). Factors that make the media system an independent system include public support for the publicness of media, coded operation of the media system itself, and professional ethics inherent in media organizations (Jung, 2004, p. 135). The media system's organizations and performances are expressions of cultural and social self-image and therefore, the media system reflect social and political structures and rely closely on technical, economic and social frameworks. In this context, differentiated media systems have been developed (Schneider, 1998, p. 422). Its goals are generally allowed only when they do not run counter to the expectations of society (Jarren, & Meier, 2002, p. 102).

In general, a media system comprises all mass media organized or operating within a given social and political system. Historically, the concept of this collective term was used to refer to the major mass media organized at national level such as print media (newspapers mainly), broadcasting media (radio and television), and occasionally allied media industries including films and advertising (Hardy, 2010, p. 5; Beck, 2018, p. 2).

⁵⁴ Saxer, U. (1981). Publizistik und Politik als interdependente Systeme, pp. 501-514 in *Media Perspektiven* (Heft 7/1981).

The 'Dominance of mass media' model views that while political system and media system are interdependent, the degree of dependence between the two is never the same or similar and that the political system (government, politician, political class) relies more on the media system, which forms public opinions as the "overwhelming power (die überwältigende Macht)" towards individual members of society as well as the government and enables "social control (soziale Kontrolle)" necessary to achieve their goals (Noelle-Neumann, 1996, pp. 8-9; 2002, pp. 547-549). In addition, the media not only report and make a comment on issues but also define limitations of the scope of political system activities by suggesting or limiting alternatives from the stage before political decisions (Choi, 1996, p. 10-11); thereby, the media system itself becomes a sort of political power. In this model, the political parties try to influence the topics (agenda selection) of media through personnel decisions to make up for their inferiority and at this time, the target of personnel decisions (intervention) becomes public service broadcaster where all senior positions are assigned according to the principle of proportional representation under statutory provisions (Kepplinger, 2009, p. 14).

The 'Loss of media autonomy (i.e., Dominance of political power)' model asserts that increasing roles of media in the political process should not be seen as a result of increasing power of the media but as the result of gradual loss of autonomy in the media following instrumentalization of it by the political system. In other words, amid growing social demands due to the political and economic crisis, the political system understands control function (Steuerungspotential) of the media and seeks to utilize its function for a specific purpose. Besides, due to the growing interest of political system in mass media and their reporting practices, intervention in and attempts to instrumentalize the media system increase and thereby, the media system loses its autonomy and is increasingly subordinate to the executive and controlling measures (Steuerungsmaßnahmen)—e.g. media and communication policy, news and information policy, public relations and social marketing (Jarren, Grothe, & Rybarczyk, 1993 p. 14). Under the "logic of system (systemlogisch)", examples of endeavors and strategies to instrumentalize the media include exercising direct and indirect influence over public broadcasters and actively practicing political public relations (Schatz, 1982, pp. 13, 18; Choi, 1995, p. 19). Furthermore, this model appears mainly in totalitarian societies before the establishment of democratic systems and in societies where democratic systems were established but authoritarian regimes come into power (Whang et al., 2012, p. 652).

The 'Super system or Symbiosis' model sees that as the political process is subordinate to media operating rules, the political system tends to lose its autonomy, and that the media system also tends to lose its autonomy as the political system attempts to instrumentalize the media to meet its political purpose (Choi, 1996, p. 13). In this way, the gap between the political system and the media system gradually narrows—in short, the mediatization of politics and the politicization of the media—and as a result of increasing mutual dependency, both systems lose their own autonomy and therefore, policy-making (Politikproduktion) is a product of cooperation (or division of task) by interaction of the two systems. As a result, the two systems converge and eventually form a 'super system', a "political technostructure (eine politische Technostruktur)", as a single entity (Plasser, 1985, p. 13; Köstler, 2012, p. 125). In addition, due to this mutual subordination and need for existence—an exchange relationship⁵⁵ is formed in which media reporting and information in politics are exchanged—this model is also called 'partnership' or a 'symbiosis' relationship between the political system and the media system (Sarcinelli, 1994, p. 39; Köstler, 2012, pp. 125-126).

In addition, breaking away from the biased—political-driven or media-centric⁵⁶—perspectives (limits) on these relationships on a macro-level, Choi Yong-joo (1995, pp. 66-103; 1996, pp. 19-28) took both perspectives into

⁵⁵ The defining characteristic of exchange relationships is that benefits are given with the expectation of receiving a comparable benefit in the future or in return for a benefit already received. In other words, in exchange relationships, there is the expectation of balance in giving and taking (the *quid pro quo*—"this for that"—rule governing exchange relationships); therefore, exchange relationships are contrasted with communal relationships that are less concerned with perfect balance between partners—e.g. family, friendships and romantic relationships. As a typical exchange relationship, business partners' relation is cited (Clark, & Mills, 1979, pp. 12-13, 23; Batson, 1993, pp. 677-678; Social Psych Online, 2016).

⁵⁶ As for influences of politics (including government) and the media over each other, there was even a theoretical debate in German academia (journalism and political science) in the 1990s over the influence of which side is dominant and what the consequences are. That is because one side criticized the media's excessive influence over political system, while the other side insisted on the loss of media autonomy by political system (Holtz-Bacha, 1990, p. 27; Choi, 1996, p. 6; Köstler, 2012, p.

account and devised the ‘Interpenetration model of political system and media system’ encompassing the above-mentioned relationships, which includes two meanings, the mediatization of politics (penetration of the political process by the media) and the instrumentalization of the media (penetration of the mass communication process by politics). Based on a critical review of the existing models, he presented and schematized four types of relationships that are subsidiary to this model.

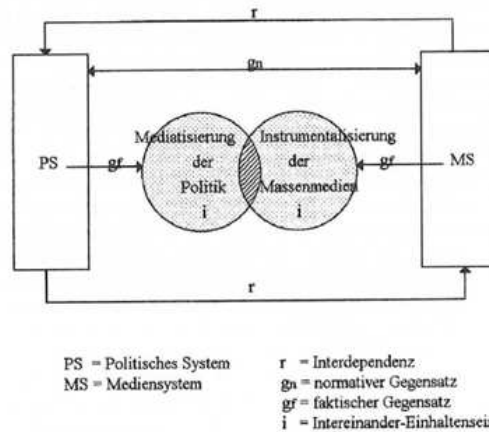


Figure 4 Interpenetrationsmodell von Politik und Medien⁵⁷ (Source: Choi, 1995, p. 100; 1996, p. 26)

Meanwhile, Han Eung-soo (2009, pp. 14-15) who studied the Korean government PR policies—on the assumption that distinctive relationships are formed depending on the degrees of influence from the government and the press—classified the relationships into four types according to the relative difference in influence.

	competitive/confrontational/tense relationship	complementing/cooperative/checking relationship
↑ Influence of the Press	coexistent/laissez-faire relationship	collusive ties/ instrumentalization for PR
	Government Influence →	

Figure 5 Typology of government-press relationship in terms of mutual influences (Source: Han, 2009, p. 15)

123; Schönhagen, & Meißner, 2016, p. 749).

All actors in the political sphere—the executive, political parties, parliamentary factions, interest and advocacy groups, individual politicians, and political entrepreneurs, etc.—compete for favorable attention from media; however, the government (the executive) is most advantageous for getting media attention since it plays a role as a decision-maker. In particular, the government has the authority to take advantage of state resources and institutions for public information, and official publicity agencies respond to the media by employing many public officials and public information specialists who work in intelligence, media communication, and policy consulting; therefore, there is an evaluation that the government’s influence is superior to the media’s one (Pfetsch, 1998, pp. 76-77).

On the other hand, in a situation where everyone in the political arena is striving to influence the public for his own personal ambition or organizational gain, most issues are practically set through the media ‘filter’ and by the agenda-setting function of the media. Thus, the media are able to influence the political culture, determine the life and career of politicians, sometimes change government policy priorities. For this reason, there is also an argument that in the competitive game for public’s attention, the ‘gatekeepers’, who are the media persons, have the upper hand (Kalantari, 2001, pp. 880-881).

⁵⁷ The part with oblique lines in the middle of the Figure means that the ‘mediatization of politics’ and the ‘instrumentalization of the media’ may overlap somewhat, and also that it is difficult to distinguish between political activities and communication in the course of political communication (Choi, 1996, p. 28).

2.3.2.4.2 Ways in which Governments influence the Press during Communications and Public Relations

The ways or types (strategies) in which governments use media as a means for communication or public relations are variously classified depending on criteria. In this chapter, it deals with governments' influence over the press focusing on relationship and communication between government-press and therefore, the researcher refers to the classification by Barbara Pfetsch who defined the concept of 'Government news management' in the same vein.

According to Pfetsch (1998, pp. 71-84), the general types of government news management aiming at controlling the news media agenda are divided into two broad categories depending on the focuses that the government tries to influence: media-centered news management, political or party-centered news management.

Media-centered news management directly focuses on creating positive news coverage and popular support for which the media audience is a surrogate. The practical task of this news management is to subject a certain political message to the formats, the news values and the logistics of the media and maximize the chances of positive news coverage; at this time, the substance of the message is secondary (Pfetsch, 1998, p. 73). The message tends to focus on the person of the Chief Executive or other leading government figures (e.g. cabinet ministers) and this news management is likely to occur in the countries with a presidential system like the United States (Pfetsch, 1998, pp. 78-79).

On the other hand, in political or party-centered news management, media are only a means, not an objective of the action to influence. The goal is to orchestrate a "political game" among the political elites and to do so, the practical task is to shape the messages according to political objectives of the executive as compared with the other political parties and to maximize political aspects in message production while minimizing the adaptation to the media (Pfetsch, 1998, p. 73). Therefore, the messages focus on issues or policies that need to communicate. This news management is the prominent form of strategic communications in the countries with a parliamentary system like Great Britain and Germany, which have parliamentary political systems and strong party governments (Pfetsch, 1998, pp. 75, 81).

On the basis of the features of each type of news management, Pfetsch argued as follows (1998, pp. 78-84):

- The greater the independence of the Chief Executive, the more his news management strategy will be personalized and media-driven;
- Media-centered news management tends to be more frequent among adversarial media cultures such as commercialization and increased competition;
- A partisan press and public service broadcasting might foster political news management modes, and political news management will occur more frequently in systems characterized by consensual roles between journalists and politicians;
- Government news management takes place simultaneously through routinized institutional channels—e.g. regular press conferences, briefings—and personal channels of exchange between public information officers and journalists—e.g. off-the-record information/statements, covert leaks, background circles (Hintergrundkreise) where journalists regularly invite politicians or their spokespersons.

In addition, Pfetsch (1998, p. 78) mentioned three political environmental factors that might contribute to different styles of political communication and affect the general types of news management: 1) the role of the executive (depending on a presidential system or a parliamentary system), 2) the structure of media system (which consists of the organization and regulation of mass communication), 3) the media culture (which shapes the interaction and relationships between political actors and news media). Pfetsch added, however, that the processes of political communication are not uniform at all and are highly affected by environmental factors across and within different systems; hence, the exact nature of news management varies across different countries and over time.

Meanwhile, political scientists Fritz Plasser, Franz Sommer and Christian Scheucher (1996, pp. 89-90) presented four patterns⁵⁸ of politics mediation (Politikvermittlung) by mass media under a "populism" news logic: 1)

⁵⁸ See Appendix 5 for details on the four patterns.

hochgradige Personalisierung der Berichterstattung, 2) Dethematisierung, 3) Negativismus, 4) sportliche Dramatisierung, so-called “horse race journalism”.

Pfetsch (1998, p. 74) saw the above patterns as being used strategically by the government to produce policy messages and manage issues, and positioned these patterns on the government’s action repertoire in the two dimensions of news management—i.e. according to strategy(type) of news management and object of the message.

Object of the message	Strategy of news management	
	Media centered	political
Person	Image management Visualization	Political attacks Negativism
Issue	Pseudoevents Drama and action	Dethematization Framing and spin-control

Figure 6 Typology of news management and action repertoire (Source: Pfetsch, 1998, p. 74)

The above table can be a basis for understanding governments' behaviors of communication or public relations in their strategic context of news management.

2.3.2.5 Conclusion: Things Governments exert on the Press and the Ambiguity of Demarcation among them

As noted above, the researcher described ‘what governments exert on the press’ by classifying it as control, regulation and influence.

To sum up, *control* is executed through a quite unreasonable, authoritarian and oppressive means and methods. *Regulation* is carried out on the basis of policies and laws to achieve seemingly legitimate goals, but it is characterized by the inherent possibility of being abused as a “legitimate” means of control depending on the intentions of regulatory bodies. *Influence* appears extensively with a wide variety of ways in the process of governments’ communication or public relations, so it is most comprehensive. In addition, as with regulation, depending on an entity’s intention to influence or the circumstance at the time, the position of the press to accept (interpret) it is different; so, a judgement on government influence may vary as well.

Control, regulation, and influence can be classified theoretically and conceptually by the researcher’s description; however, since each definition and scope of the concepts are not yet clearly provided and especially there is the limitation of being unable to know the intentions of the subjects (government bodies/actors) to exert them—that is, due to the ambiguity—there are difficulties in demarcating boundaries in fact. In other words, it is impossible to draw clear lines of demarcation between the three until the intention of each subject of actions and the consequences are known.

Given the characteristics and scope of each of the three concepts as well as the limitation in demarcating them, when ‘things governments exert on the press’ is theoretically schematized, it is as follows.

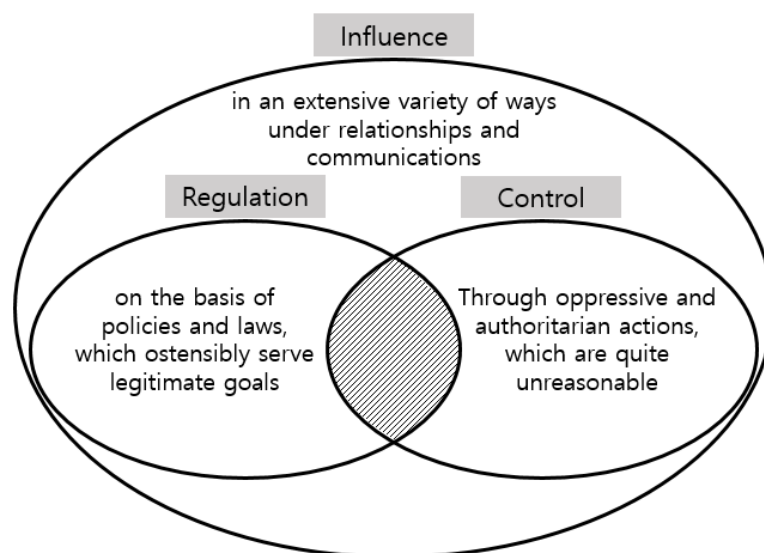


Figure 7 Schema in a comprehensive representation of ‘things governments exert on the press’⁵⁹

In conclusion, ‘Control’, ‘Regulation’, and ‘Influence’ are part of a continuum and concurrently, the three affect each other. <Figure 7> shows a comprehensive continuum of ‘what governments exert on the press’.

⁵⁹ The part with oblique lines in the Figure is a symbolic representation of the case in which it is difficult to distinguish between ‘Control’ and ‘Regulation’.

2.4 Media Environment

2.4.1 Concept of ‘Media Environment’ and Division into External and Internal Environments

There are factors that respond to ‘what governments exert on the press’ and further involve in—contribute or resist to—the process, and those specific factors make governments’ goal successful or unsuccessful. The collective name for these related factors can be referred to as ‘media environment’.

US media scholars Andrea L. Press and Bruce A. Williams (2010, p. 8) defined “the media environment as both the specific communications technology in use (e.g. personal computers, newspapers, and television) and the social, political, and economic structure within which these technologies are used (e.g. how media outlets are owned, how individuals actually use them for a wide range of purposes, and the government regulations that affect them)”. They said that media operate within and on all of the social structures and also, institutions like government are the source of values and attitudes that affect the way we use media in our everyday lives.

In a word, the media environment is a terminology that encompasses media itself, various systems (related policies, laws and regulations) that affect their organization and operation, and direct/indirect stakeholders around the media. In terms of journalism (covering and reporting), the media environment refers to everything that intervenes or influences a series of processes by which news is produced and consumed, that is, from how a journalist covers news, how a press company as a system makes a value judgement on the resulting news and finally determines whether to report it or not, to how society (audiences) reacts to the news.

US journalism scholars Pamela J. Shoemaker and Stephen D. Reese (1996; 2016) identified what influences media content, especially news, when it is produced, and presented the findings through the hierarchy of influences model. Instead of defining ‘something’ that influences media and news, they used the phrase ‘the complex factors shaping media content’ (2016, p. 389). However, as complex factors shaping media content, factors which influence news production refer to media environment factors and their entire group can be defined as media environment.

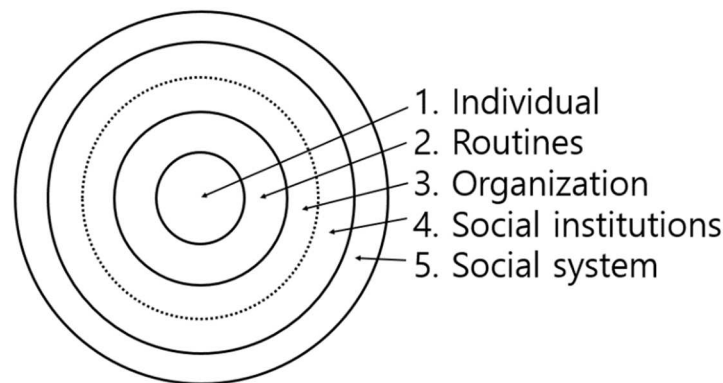


Figure 8 Individual influences on media content in the hierarchical model⁶⁰
(Source: Shoemaker, & Reese, 1996, p. 64; 2016, pp. 398-405)

Shoemaker and Reese (2016, pp. 395-405) divided the factors affecting news production into five levels of analysis, from the perspective of media sociology: individual, routines (media practice), organization (conditions/tendencies), social institutions (groups), and social system (ideologies). The individual is the most micro level, and it refers to the insight, expertise and political orientation (values) of a journalist. Routines refer to the behavioural patterns that appear in the process of covering and reporting and that are the result of following rules and ethics code in media. As news is the outcome of an organizational production process, it can be changed,

⁶⁰ The dotted circle in the Figure means the division of internal and external media environments; that is, the inside of the dotted circle is the internal media environment (inside of media organization), while the outside is the external media environment.

depending on a press company's production environment (offline/online), political orientation, ownership structure, power and control of the editor, complexity of gatekeeping procedures, etc. This includes everything outside of media organizational boundary, social institutions include advertisers, audiences, interest groups, news sources and the government, etc. As advertisers and audiences show instant reactions to news through the use of mobile devices in the digital world, they are actively influencing the news production and gatekeeping more than ever. The government also belongs to social institutions, because it constantly influences media and news production in official/unofficial and indirect/direct ways—as delineated in Part 2.3.2.2.2 Types of Press Control. Finally, at the most macro level, the social system influences news, as the notional system (ideology) that affects the thoughts, actions and lifestyle of social groups (Hong, & Choi, 2017, p. 211).

As mentioned above, news is produced under the influences of various factors inside and outside media, and it is when these influences violate the social consensus and infringe on freedom of the press, that resistance arises. In other words, when pressures and control are applied to the press, single/multiple factors outside the press company, not just factors inside the press company, rise up to demand freedom of the press. Media management scholar Lucy Küng (2000a, pp. 220-221; 2000b, pp. 108-109) made a comparative study on the UK public broadcaster *BBC* and the US cable news channel *CNN* and revealed that media organisation's own history, vision and financial condition affect the values of its members and the formation of its culture, and that the resulting media organisation culture plays a great role in establishing a strategy to resolve internal and external problems.

Therefore, the researcher takes Shoemaker and Reese's hierarchy of influences model as the basic concept of media environment, and categorizes the 'individual', 'routines', 'organization' as internal media environment factors, and the 'social institutions', 'social system' as external media environment factors.

The reason for distinguishing the internal and external media environments is to identify whether press companies (including journalists) autonomically react to 'what the government exerts on them', or the reaction arises from factors outside press companies. In this way, it is possible to evaluate press companies' attitude or resistance will/capability to excessive influence by the government—in other words, infringement on press freedom.

2.4.2 Correlation between Things Governments exert on the Press and the Regression of Democracy

It is natural to reason syllogistically that after democratization, with the passing of time, democracy would mature and develop so that government influence over the press diminishes, leading to strengthened freedom of the press. However, in contrast to such predictions, a perusal of related indicators shows that in the 21st Century, democracy is either stagnated or receding.

British weekly economic magazine *The Economist* annually publishes the *Democracy Index*⁶¹ for over 160 countries. <Figure 9> shows the *Democracy Index* and its trend over the years, and it can be confirmed that the continental and global *Democracy Index* figures are not going up, but rather, slowly decreasing.

	2006	2008	2010	2011	2012	2013	2014	2015	2016	2017	2018
North America	8.64	8.64	8.63	8.59	8.59	8.59	8.59	8.56	8.56	8.56	8.56
Western Europe	8.60	8.61	8.45	8.40	8.44	8.41	8.41	8.42	8.40	8.38	8.35
Latin America	6.37	6.43	6.37	6.35	6.36	6.38	6.36	6.37	6.33	6.26	6.24
Asia & Australasia	5.44	5.58	5.53	5.51	5.56	5.61	5.70	5.74	5.74	5.63	5.67
Eastern Europe	5.76	5.67	5.55	5.50	5.51	5.53	5.58	5.55	5.43	5.40	5.42
Sub-Saharan Africa	4.24	4.28	4.23	4.32	4.32	4.36	4.34	4.38	4.37	4.35	4.36
Middle East & North Africa	3.53	3.54	3.43	3.62	3.73	3.68	3.65	3.58	3.56	3.54	3.54
World average	5.52	5.55	5.46	5.49	5.52	5.53	5.55	5.55	5.52	5.48	5.48

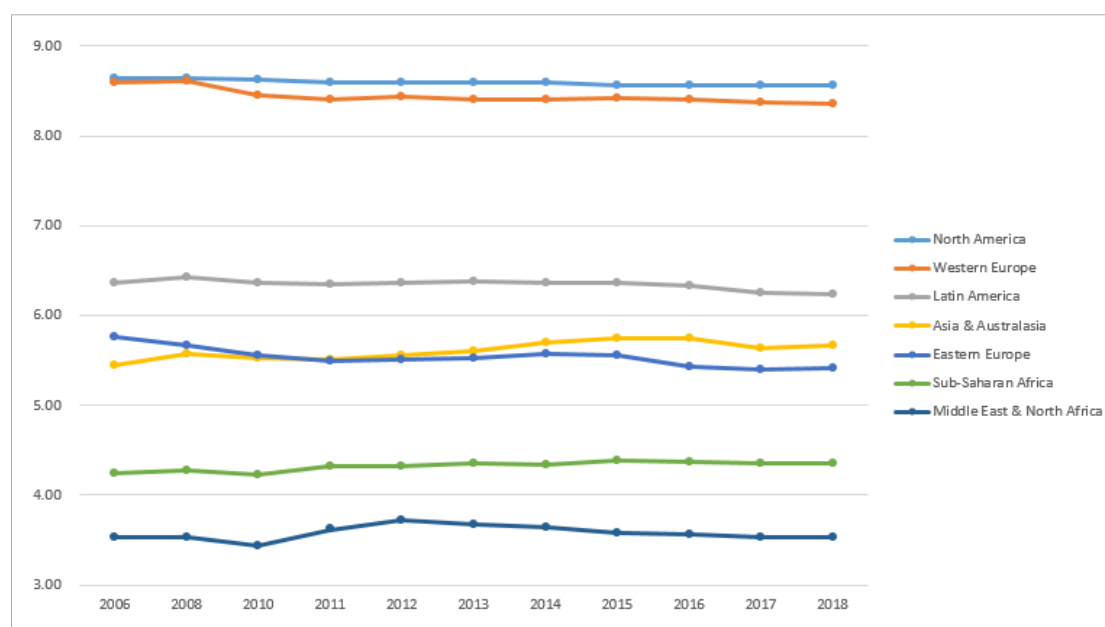


Figure 9 Democracy Index by region (2006–2018) (Source: The Economist, 2019, p. 10)

⁶¹ The *Democracy Index* is an index compiled by the *Economist Intelligence Unit* (EIU)—the research and analysis division of *The Economist Group* and the sister company to *The Economist*—that intends to measure the state of democracy in 167 countries, of which 166 are sovereign states and 164 are UN member states.

The Economist (2018, p. 3) critiqued this trend through its 2017 annual report in which it stated that “Disappointment with ‘actually existing democracy’” and that democratic recession is evident in both Western Europe, where the world’s oldest democracies are gathered, and the United States. In this regard, Larry Diamond, an American political sociologist and leading scholar in the field of democracy studies, said that we have been going through a “democracy recession”, and this trend of stagnation or regression has been reflected in the annual *Democracy Index* since its launch in 2006.

The report with a sub-title “*Free speech under attack*” suggests there are eight key indicators of a declining democracy, including decline in media freedoms and erosion of civil liberties including curbs on free speech (The Economist, 2018, p. 3). The report specifically points out that in many countries, the government is playing a significant role in diminishing the freedom of media and press, and that democratic as well as dictatorial governments had legislations against defamation, terrorism, blasphemy and hate speech, etc. which limit freedom of the press and interfere with freedom of media (The Economist, 2018, p. 12).

Freedom House, an international non-government human rights watchdog organization, produced similar results. Through its annual report *Freedom in the World 2018*, Freedom House (2018, p. 8) published <Figure 10> which shows there were more countries whose freedom, considered the key element of democracy, declined than countries where it improved, and that the gap between the two has been widening lately. In particular, in the US, which was hailed as the ‘country of freedom’, since President Donald Trump’s inauguration in 2017, democracy has declined rapidly, damaging its credibility as a champion of good governance and human rights. Furthermore, as can be seen in <Figure 11>, President Trump’s harsh criticism of the individual journalist trying to question him on his daily false statements and his threats to the press were selected as some of the key reasons for the decline of democracy in the US (Freedom House, n.d., “Freedom in the World 2018: Trajectory of the United States”).



Figure 10 Comparison of the number of countries with improved and declined freedom levels

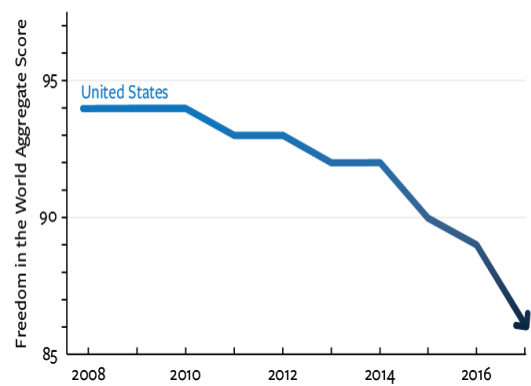


Figure 11 Freedom Index trend of the US

Democratic recession is now the 21st Century reality. If one considers the level of press freedom to be the most representative barometer to understanding this reality, it is possible to conclude that the above-mentioned reality is a result of political influence over the press taking place in democratic countries.

In conclusion, the old-fashioned political influence over the press in the 20th Century is still blatantly taking place in the 21st Century and it is causing democracy to recede in the developed countries of Western Europe as well as the US, the ‘country of freedom’. So, the researcher focuses attention on the political influence over the press—i.e. things governments exert on the press—because of the facts that democracy is in crisis because of political influences that threaten the press, and that this vicious cycle is created in which, as freedom of the press also declines, the press also finds itself in crisis.

2.4.3 The Reality of Media Environment in the 21st Century

The 21st Century reality of media environment is clearly shown through the examples of political press control discussed in Chapter 1.1 Background of the Study.

Jamal Khashoggi, a Saudi Arabian journalist who had written articles for the prominent US newspaper *The Washington Post* criticising the Saudi royal family, was killed in October 2018, in the Saudi consulate in Istanbul Turkey, under alleged orders of the Saudi crown prince. This incident, which clearly showed the reality of press control implemented by an authoritarian State in the 21st Century, shocked the entire world. In November 2018, the US Trump administration revoked the White House pass of Jim Acosta, a *CNN* correspondent who put President Donald Trump in a bad mood during a press conference. The incident was resolved in ten days, because *CNN* and Acosta brought a federal lawsuit against President Trump and several top White House aides and then a federal judge ordered the Trump administration to restore the press credentials of Acosta of *CNN* immediately. However, the fact that the president of the United States, a leading country of ‘freedom’ and ‘democracy’ openly carried out press control by restricting the covering rights of a hostile journalist enraged the press and journalists all around the world.

The realities of the press facing political control were again represented through media. US news magazine *TIME* selected Jamal Khashoggi, Maria Ressa (the CEO of the online news site *Rappler* persecuted in various ways for criticizing the Philippine president Rodrigo Duterte and his policies), Wa Lone and Kyaw Soe Oo⁶² (Reuters reporters who were arrested and sentenced to seven years of imprisonment for looking into the Myanmar military’s massacre of a stateless ethnic group, i.e. Rohingya people) as Persons of the Year 2018 (Vick, 2018). The aim of the press was to widely publicize the seriousness of press control carried out by governments around the world, but it was also a sign that the press itself was feeling a sense of threat from governments.



Figure 12 Journalists sacrificed or detained by government control: Jamal Khashoggi, Maria Ressa, wives carrying photos of Wa Lone and Kyaw Soe Oo (Source: *TIME*'s cover, December issue, 2018)

Moreover, the Committee to Protect Journalists, an independent non-governmental organization located in the United States, published that as of December 2018, there were more than 251 journalists in jail in relation to their work around the world annually for the third year in a row, 98% of which were local reporters arrested by their own government, and 70% of which were imprisoned for treason. CPJ pointed out that the past three years have recorded the highest number of jailed journalists since 1990 when it had started to collect data, with consecutive records set in 2016(259) and 2017(262). In this context, CPJ critiqued the reality and seriousness of press control practiced by 21st Century governments by stating that it was not so much that the authoritarian punishment for critical reporting had temporarily surged, but rather, that it had become the new normal (Beiser, 2018).

⁶² The two Reuters reporters, who have been put in jail in December 2017, were released on May 7, 2019 as part of an amnesty of 6,520 prisoners by Myanmar President Win Myint.

According to the CPJ's report, over half (56%) of the imprisoned journalists were under arrest by the Turkish, Chinese and Egyptian governments, for which governmental press control may seem limited to certain countries. However, the seriousness of the problem lies in that press control by the government is not limited to authoritarian and dictatorship countries but is apparent even in 21st Century advanced democracies like the United States. It can be seen in the same vein that right after the distribution of the report, CPJ's deputy executive director Robert Mahoney appeared on *CNN* to state, "The U.S. is no longer a champion of press freedom".

In addition to the current situation in which governmental press control is being implemented in 21st Century democracies, the possibility that the press control is intensified as it spreads from authoritarian to democratic countries, is also a great concern. US political scientist Samuel P. Huntington (1991, pp. 33, 100) used the concept of the "wave" to explain the trend of democratization in the late 20th Century—between 1974 and 1990—when over 30 countries in Southern Europe, Latin America, South Asia and Eastern Europe transitioned from authoritarian to democratic regimes, and he mentioned a "snowballing effect" as one of the greatest factors affecting the trend. 21st Century US journalist and political scientist Joshua Kurlantzick (2013, p. 22) explained that just as democracy had spread like a wave in the past, the regression of democracy also would follow a "diffusion effect" such as the snowballing effect to spread from authoritarian powerful countries, to their neighbouring states. In other words, the positive or negative change in one country stimulates change in another country. Applying that to governmental press control, the press control exercised by authoritarian powerful countries can spread like waves, to neighbouring countries and even more broadly, advanced democracies.

Based on the claims of the two above-mentioned scholars and the snowballing effect (or diffusion effect), it is possible to conclude that there is a high possibility that government control threatening press freedom flows from authoritarian countries to neighbouring countries or even to the world. Beginning with the return of Vladimir Putin as president of Russia in 2012, followed by Xi Jinping as Chinese General Secretary, Abdel Fattah al-Sisi as president of Egypt, Recep Tayyip Erdogan as president of Turkey, Rodrigo Duterte as president of the Philippines, and up to Donald Trump as president of the United States, there is an emergence of 'strongmen' who emphasized ethnocentrism or nationalism. These national leaders' control of the press is negatively affecting media environment under the pretext of pursuing their own national interest and security, and to show off their powers. Moreover, there is vigorous interaction among these leaders that have the qualities of a 'strongman', and conservative parties that share many values with authoritarianism are gaining power one after the other in many countries. Hence, the foundation for the further transfer and spread of governmental press control in the 21st Century is already laid.

Therefore, governmental press control is a serious concern, not just in authoritarian countries and dictatorships, but it is also a concern because it is likely to appear in advanced democracies as well. For this reason, it is necessary to understand influences that governments exert on the press in the 21st Century and to monitor the status quo of media environment.

2.5 Review of Existing Studies: Trends and Limitations

Leonard R. Sussman (1989, p. 191) stated that, on the basis of a survey on the types and degrees of influences over the press, “Governmental influence, control, or censorship is the primary determinant of news media freedoms in every country”. Among various factors affecting press freedom, it is safe to say that the government is the most basic and primary influencing factor that we must take a closer look at and guard against.

With the continuance of democracy, however, the government has ostensibly shown a tendency to avoid dealing with press control, and this tendency is becoming increasingly prominent (Suh, Cha, & Choi, 1983, p. 70). It is for this reason that what governments exert on the press is rarely detected.

Moreover, with changes in media environment through the emergence of new media, innovative news platforms and increasing fake news, and with the rise of economic press control, the awareness and vigilance towards political press control(government influence) has become less than before. It is, only when shocking incidents such as the murder of Saudi Arabian journalist Jamal Khashoggi take place, that ‘political press control’ rises to the surface. Otherwise, it is treated and ignored as an outdated research topic.

Having searched for the current status of studies on the topic of press control through the academic web search engine *Google Scholar*⁶³, most of the studies on ‘political press control’ are focused on the period from the 1960s when, after WWII, the countries experienced the ‘second wave of democratization’ and then regressed to authoritarian regimes, to the 1990s when Eastern Bloc socialist regimes collapsed. The same goes for the theory on press control. For instance, the *Four Theories of the Press*, which explained the ways of press control as determined by the system (political ideology) and which is considered the most conventional theory of press control, was introduced as a book in 1956. The concept of ‘gatekeeper’ introduced by German-American social psychologist Kurt Lewin in 1947 was utilized by US journalism scholar David Manning White in 1950, and then it was completed as the ‘gatekeeping theory’ to explain a series of processes by which news is selected and controlled within a press company by US journalism scholar Pamela J. Shoemaker in 1991.

A review of the two countries that are the object of research in this study shows that, in the case of Germany, most of the studies on governmental press control are about the Third Reich period under Adolf Hitler (1933-1945), while the studies on freedom of the press (*Pressefreiheit*) and censorship (*Zensur*) are focused on the period of East Germany (1949-1990). In the case of South Korea, most of the research into governmental press control is aimed at the two military regime periods under Park Chung-hee (1961-1979) and Chun Doo-hwan (1979-1988) in which media control was severe. Since democracy settled in South Korea, however, press control has been implemented for about 10 years by the two conservative regimes under Lee Myung-bak (2008-2013) and Park Geun-hye (2013-2017). For this reason, there are a few essays and analysis reports⁶⁴ about the period from journalists and press companies that suffered from the control, and a qualitative study on factors detrimental to the fairness of Korean public broadcasting news (Jung, 2012). In conclusion, there is no study that takes the secret, subtle press control carried out by 21st Century democratic governments as its main topic, and delves deeply into the substance and whole aspect of governmental press control. This shows that either government influence over the press has been overlooked or things governments exert the press have been pushed back by some other influencing factors that have newly emerged or attracted attention.

In recent years, the government’s target for regulation has become online media and fake news. Governments around the world are struggling to establish institutional mechanisms on the pretext of preventing social confusion and damage caused by fake news. In Germany, the Network Enforcement Act (*Netzwerkdurchsetzungsgesetz*, *NetzDG*), which imposed a maximum fine of EUR 50 million on a social media/networking service company—with over 2 million registered users in Germany, regardless of where the social network is

⁶³ Search using Korean, English and German keywords: 언론통제, press/media control, Pressesteuerung, Eingriff/Einmischung in die Berichterstattung, Maulkorb für die Presse/Medien, Pressefreiheit, etc.

⁶⁴ Jung, Yun-joo. (2011). *Testimony of Yun-joo Jung: Why I was dismissed from KBS*.

Citizens’ Coalition for Democratic Media. (2017). *News reporting guidelines: 1986 and 2016*.

National Union of Media Workers’ KBS branch. (2018). *Media control and treacherous act, 10-year resistance: Lee Myung-bak and KBS* (Vol.1).

established—that neglected to remove postings which included fake news or encouraged terrorism and hate speech, came into force on October 1, 2017 and was fully enforced on January 1, 2018. There have been concerns and criticisms that the government could violate freedom of the press, which is the foundation of democracy, under the pretext of punishing fake news, and although the German Journalists Association (DJV) and numerous other civil society groups have opposed the enactment and enforcement of the law. However, this law remains in place.

Online regulation on new media and innovative news platforms is being strongly implemented by authoritarian countries like China, Saudi Arabia, Egypt, Russia and Turkey in which offline control has strongly been implementing (Freedom House, 2018a, p. 3). In these authoritarian countries, governments are oppressing opposing forces by stigmatizing the facts or allegations against them that are published online, as ‘fake news’, and dismissing objections (Freedom House, 2018a, pp. 2, 11). Through regulation on online media, they are reducing the functionality and credibility of new media and news platforms which have become the basic infrastructure of democracy in the 21st Century. Nonetheless, as can be seen in <Figure 13> and <Figure 14>, since many of the public still have more trust in legacy media like television, radio, newspaper and consume news through them, governments around the world mainly try to exercise their influence over these well-recognized mass media organizations.

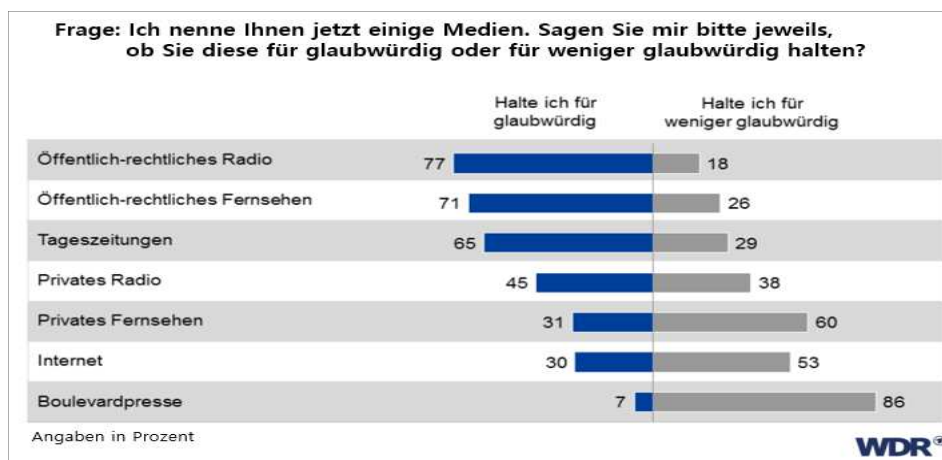


Figure 13 The credibility of German media (2015)
(Source: WDR, 2015, p. 7)

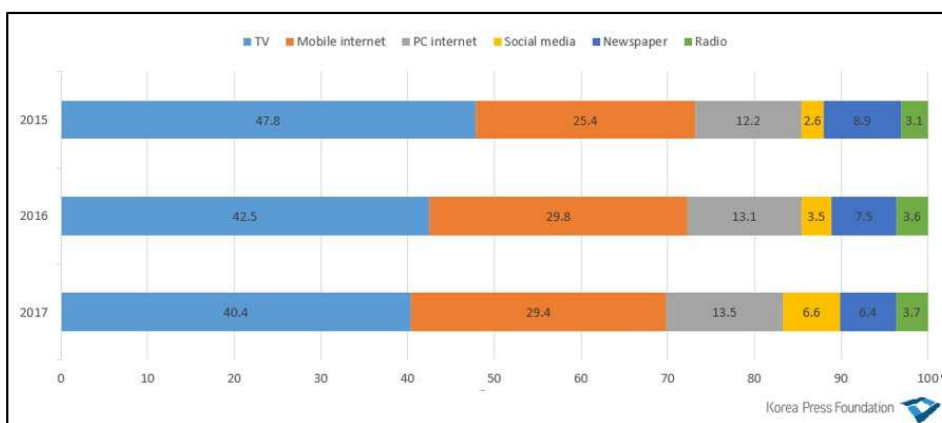


Figure 14 The share of reliance/utilization on 6 major media in South Korea (2015-2017)
(Source: Korea Press Foundation, 2017, p. 147)

Capital power is another constraint factor on press reports that has emerged in the 21st Century (Nam, 2006, p. 123). US veteran journalist and journalism scholar J. Herbert Altschull (1984, p. 298) argued, “The content of the news media always reflects the interests of those who finance the press.” It is acknowledged by most journalists that by paying a large sum of advertising fees, large corporations pressure media companies and on this account, the press control by capital power is increasingly severe. A number of journalists feel that economic press control

has started to be a problem with the onset of the multi-media era in the late 20th Century. Leonard R. Sussman (1989, p. 189) stated that based on a survey with about 100 journalists around the world from countries with and without freedom, strong commercial pressures on the press occur only half as frequently as political influences in countries with freedom, and commercial and ideological influences on the print media are twice as strong in countries without freedom as in countries with freedom.

However, economic press control is a kind of a deal made by between a press company and advertisers—in general, large corporations—based on their mutual interests. US journalism scholar John H. McManus (1994, p. 78) said that media firms following market logic and seeking to maximize profit should sweeten deals with advertisers first where it costs least—making the news supportive of commercial messages—and media firms resisting such logic in a market where their competitors accede, are likely to pay a price in profitability. In practice, in a survey of American journalists in 2000⁶⁵, significant percentages answered that some stories are not pursued because they conflict with organizational interests. Specifically, more than one-third (35%) said that news that might damage the economic interests of their media organization are often or sometimes unreported, and 29% said the same about stories that could adversely affect advertisers (Pew Research Center, 2000). This survey obviously shows that commercial forces or economic power is a control factor that causes self-censorship (Clark, & Grech, 2017, pp. 23-24).

In the same vein, media economics scholar Robert G. Picard (2004, pp. 58, 61) pointed out that the American newspaper industry in 2000 depends on advertising for more than 80 percent of its revenue and the primary content of newspapers today is commercialized news and features designed to appeal to broad audiences, to entertain, to be cost-effective and to maintain readers whose attention can be sold to advertisers. This means that media companies voluntarily compromise with advertisers and allow them to control. In other words, a press company can be aware of pressure from advertisers in advance and can also accept or refuse to succumb to the pressure—as demands directly related to its revenue—according to its own need and will. If the press company rejects the pressure, the deal itself is not made, that is, economic press control attempts by advertisers fail. That means press companies hold the decision-making power in economic press control. For this reason, it is not appropriate to consider economic press control as equally threatening as political press control. Further, unlike inevitable political press control due to its persistence and permanence, economic press control is predictable and avoidable for media companies and therefore, as press control factors, the two have different characters.

For the other part, because economic press control takes place as a result of a confidential agreement between a press company and advertisers, it is not easy to gather cases corresponding to economic press control. For this reason, it is only possible to indirectly deduce the reality of economic press control from either a survey of the subjective positions of journalists like Sussman's survey or an in-depth analysis of a single case. In other words, it carries an inherent limitation as a research topic.

For example, US journalism scholar Robert L. Craig (2004) wrote that in 1970-1971, when the University of Iowa student newspaper *The Daily Iowan* opposed the Vietnam War and published articles advocating feminist and antigovernment positions, businesses withdrew a substantial amount of advertising, which caused the newspaper to lose money. Such financial pressure led to changes in the content and staff of the paper. Craig's study shows how businesses employ their advertising to socially control and thus censor viewpoints they do not like; however, as it was an in-depth analysis of a single case, it has a limitation in generalizing the conclusion. US jurist C. Edwin Baker (1994, pp. 44) argued that print advertising has encouraged newspapers to compete with each other for bland, objective information, resulting in reducing entiation among papers and causing the eventual collapse of competition among daily papers. Furthermore, he argued that advertising is a very corrupt incentive that seriously distorts the flow of the news, and that the more newspapers depend financially on advertising revenue, the more they put the interests of advertisers before those of the readers. While Baker depicted, from a macroscopic perspective, the correlation between a back-scratching alliance of a press company and capital power, and news distortion, he was unable to concretely show the mechanism like respective ways and processes by which economic control by advertisers influences the press.

⁶⁵ The online survey was conducted on 206 reporters and 81 news executives—150 from local news outlets and 137 from national news organizations in the US—in February and March, 2000.

Therefore, it is obviously acknowledged that economic press control, namely capital power as one of the factors of press control exists but, due to its characteristics—as mentioned above, predictability, possibility of avoidance, and non-easiness for research—it is distinguished from political press control. So, this study focuses on the political press control in consideration of unavoidability and accessibility.

In terms of studies highly related to ‘political press control’, we find Freedom House’s annual report *Freedom of the Press* published since 1980, and the *Press Freedom Index* published by Reporters Without Borders since 2002. By providing a global bird’s-eye view of press control, these reports and statistics attract the attention of the public as well as journalists all around the world, each time they are published.

However, these two studies, despite their reputation, are limited in the utility of their data. *Freedom of the Press* and *Press Freedom Index* are both very abstract in that they focus on ranking countries through relative evaluation. With the ranking and score, it is only possible to judge whether or not there has been improvement by comparing to those of previous years. Countries are only self-aware of their current level of press freedom. Countries cannot identify the specific factors threatening press freedom in their own countries from the two studies' results, and therefore the two studies are not practically utilized for improving and resolving problems as much as they attract attention.

In conclusion, it can be pointed out as a problem that there is no active study on political press control or government influence on the press. As a result, it is concerned that government’s infringement on press freedom can be intensified, due to this lack of interest and wariness against the government that is the most basic and primary influencing factor.

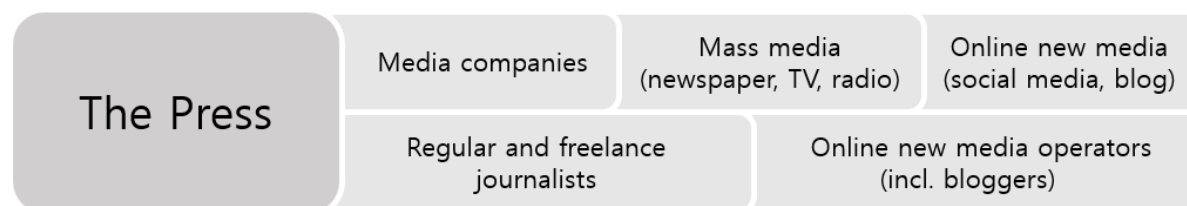
Chapter 3. Methodology

3.1 Operational Definitions of Keywords

a. The Press

In this study, the press, which becomes an object of government influence, refers to the following, based on the content of Part 2.1.2 Concept of ‘the Press’:

- Mainly mass media such as newspaper, TV and radio, and plus online new media such as social media and blog that produce, gather or disseminate news on public affairs for the general public in the form of journalistic-edited content;
- Regular and freelance journalists who mainly conduct journalism activities like coverage and reporting through these media, as well as those who run online new media including bloggers;
- Agencies that operate these media, i.e. media companies.



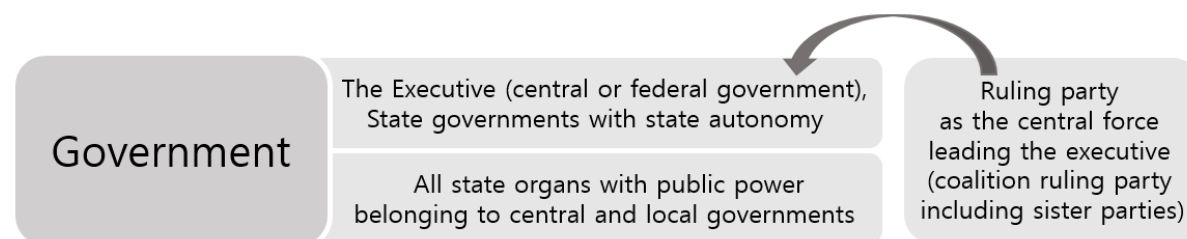
This operational definition of the scope of media is based on the Council of Europe’s guidance (2011) that guarantee of the media pluralism and diversity to promote freedom and independence of the press and ensure the adequate functioning of the media ecosystem, that is, understanding the press in a broad sense is necessary. In addition, this is a result of reflecting the current trend in which press freedom studies related to the study topic—by Freedom House and Reporters Without Borders—lay weight on the role of digital media and broadly define media and journalists.

b. Government

In this study, government, as a subject exerting influence on the press, refers to the following, based on the content of Part 2.2.1 Concept of ‘Government’:

- Mainly the executive (central or federal government) as an entity fragmented by the separation of powers in constitutional law, including state governments (Landesregierungen) with the status of an independent state in the case of Germany;
- In a broad sense, all state organs with governmental authority belonging to a central government and local governments, e.g. high-level bureaucrats, public officials exercising public power, etc.

The reason for taking the concept of government in a broad sense is that the results of public officials’ exercise of public power, regardless of rank, are all attributed to the relevant organs and further to the ‘government’ as the collective name for them—so-called ‘attribution of conduct to a state’. Above all, it is to reflect the views of society and the public on the concept of ‘government’ as a conventional symbol that has been ideated in everyday life. Thus, it is necessary to apply the broad concept of government on a limited basis depending on the case.



Besides, the researcher adds a ‘ruling party’ to the concept of government. This is to recognize and reflect the need to add a ‘ruling party’ to the concept of government in a narrow sense (the executive) through theoretical study.

In a country adopting a presidential system like South Korea, a ruling or majority party leads in state affairs. Especially in a country with a parliamentary cabinet system like Germany, the chairperson of a ruling party (coalition ruling party or Union parties) takes the role of federal chancellor⁶⁶ and many of the members of the ruling party are appointed as ministers to form the cabinet of the federal government (coalition government), and they take charge of operation of the executive (Lee, 2014, p. 91). This means that the ruling party leads the executive. Such processes are the same for federal states. German political communication scholar Barbara Pfetsch (1998, pp. 72, 81) argued that under a strong party government, “The chancellor tries to set the media agenda in a way that positions his administration as political leader within the coalition government and vis-à-vis the opposition parties.”

Therefore, in order to pursue the completeness of grasping the phenomena related to the study topic, the researcher regards a ruling party (coalition ruling party including sister parties) as the central force leading the government (the executive) and includes it in the narrow concept of government.

The criteria for viewing malfeasance committed by individual public officials or ruling party officials, not by government agencies, as ‘something the government exerts’ are whether that action was not for their own personal profits but for the interests of the organization called ‘government’, or whether they abused their own public status (public power).

3.2 Objects of Study: South Korea and Germany

South Korea is the main object of study that made the researcher have a critical mind of government influence over the press. Although South Korea is regarded as a country in Asia, in which the democratic system has developed considerably, its level of internationally known press freedom is relatively low. Germany, where the researcher resided to carry out this study, is the other object of study for comparison with South Korea. Germany is an advanced democratic country in Europe with the highest level of press freedom among countries that belong to the world leading group, for which reason it is considered appropriate to compare the South Korean government’s influence on the press to that of the German government. In other words, it is to identify how the tendencies of the governments’ influence on the press appear respectively in the two countries that differ in the degree of press freedom externally, and further to understand the backgrounds. In addition, since the two countries have different forms of government—South Korea has a presidential system and meanwhile, Germany has a parliamentary system—it is to determine whether there are differences in the tendency of government influence on the press depending on the form of government.

⁶⁶ Under section 1·2 of article 63 of the Basic Law for the Federal Republic of Germany (Grundgesetz für die Bundesrepublik Deutschland), the Federal Chancellor (Bundeskanzler) is usually elected without debate by the Bundestag upon the proposal of the Federal President; the person obtaining the votes of the majority of the members of the Bundestag is appointed by the Federal President. In the end, based on the consequence for the federal election for the Bundestag, the leader of the majority party (ruling party)—a single party or coalition party that won a majority of seats in the Bundestag—is bound to be elected as the Federal Chancellor. Therefore, it can be said that the Chairperson of the ruling party is the Federal Chancellor.

However, it is necessary to get it straight that exceptionally or temporarily, there are some cases of ‘Federal Chancellor ≠ Chairperson of the ruling party’. Helmut Schmidt, Federal Chancellor of West Germany (1974-1982, SPD), was serving as Federal Minister of Finance when his predecessor (Willy Brandt) resigned in the wake of a scandal (Guillaume affair), and he took the office of acting Chancellor for a while and then was formally elected as Chancellor through the votes of the members of the Bundestag. Gerhard Schröder, Federal Chancellor (1998-2005), resigned as SPD Chairman during his term of office in February 2004. Angela Merkel, Federal Chancellor (since 2005), also stepped down from the office of CDU Chairwoman in October 2018, although she is supposed to take the Chancellery until 2021. In this way, the span of these discrepancies belongs to a very short/limited period in the entire tenure of the corresponding Federal Chancellor and so, in this study, the Federal Chancellor is practically regarded as the Chairperson of the ruling party.

The levels of press freedom in South Korea and Germany and the difference between the levels are based on Freedom House's annual report *Freedom of the Press* and the *World Press Freedom Index* published by Reporters Without Borders⁶⁷.

In particular, both South Korea and Germany have experienced press control under authoritarian (dictatorial or military) regimes in the past and restored their freedom of the press through mass movements for democratization⁶⁸. The two countries also share the similarity that their governments had controlled the press as a pretext for security problems in the situation of being divided into respectively North-South, East-West. Because of such historical similarities—in other words, allowing for control of variables—it is judged that the two countries are suitable as objects of comparative study.

3.3 Hypothesis and Research Questions

As mentioned in Part 2.3.1, government and the press are in an ideological conflict relation and so, when each performs its own role, inevitable conflicts arise. In this context, government (the powerful) has the nature to constantly pressure and control the press for maintaining and strengthening its authority.

Also stated in Part 2.5, while other factors and issues that threaten freedom of the press have emerged to push back government from the forefront, government's interest in mass media influence stands still. Furthermore, according to Sussman's argument (1989, p. 191), government is the most basic and major influencing factor that affects press freedom while exerting something on the press. Therefore, the researcher pays attention to the government as a factor that influences the press's free and faithful fulfillment of its role in democratic countries in the 21st century.

The study aims to identify what and how governments exerted on the press, how the media environment responded to that, and what perceptions journalists have of their government's influence, targeting two countries of the East and the West, South Korea and Germany which are internationally recognized as countries with freedom of the press due to a fairly developed democratic system. Through this, the study ultimately seeks measures to improve the existing media environment by grasping government influence's tendencies, journalists' perceptions of their government influence, and their perceptions' reasons/backgrounds.

To achieve these goals, the following hypothesis and research questions were established.

Hypothesis

In democracies, governments emphasize the guarantee of press freedom as laid out in the constitution and tend to seemingly avoid dealing with press control—which is 'influence on the press' to say it in a neutral way; however, they affect the press in certain ways in order to strengthen or maintain its authority. In this regard, the media environment responds to that.

⁶⁷ In Freedom House's annual report *Freedom of the Press*, the lower the score, the higher the degree of press freedom. The degrees of press freedom are classified into three categories depending on the total score: Free (0-30), Partly Free (31-60), Not Free (61-100). According to *Freedom of the Press 2017*,

· South Korea is designated as 'Partly Free', ranking 66th out of 199 countries, with a total press freedom score of 34 points: legal environment 11 points, political environment 14 points and economic environment 9 points.

· Germany is designated as 'Free', ranking 25th out of 199 countries, with a total press freedom score of 20 points: legal environment 6 points, political environment 10 points and economic environment 4 points.

On the *2018 World Press Freedom Index* of Reporters Without Borders,

· South Korea ranks 43rd out of 180 countries, with a score of 23.51 (Fairly good)

· Germany ranks 15th out of 180 countries, with a score of 14.39 (Good)

⁶⁸ 1980 Gwangju Democratization Movement. URL: https://en.wikipedia.org/wiki/Gwangju_Uprising

1987 June Democracy Movement. URL: https://en.wikipedia.org/wiki/June_Struggle

1989/1990 Montagsdemonstrationen in der DDR.

URL: https://de.wikipedia.org/wiki/Montagsdemonstrationen_1989/1990_in_der_DDR

Research Questions

In South Korea and Germany which are 21st-century democracies known to have differing levels of press freedom,

RQ 1. How did the aspects of the governments' influence on the press look? In what way did it work?

RQ 1-1. How did the media environment respond to it?

RQ 2. What perception do journalists have of their government's influence?

RQ 2-1. What are the reasons/backgrounds for journalists to have such perceptions in terms of the media environment?

RQ 3. Is there a difference in the perceptions of journalists in each country?

RQ 3-1. If so, does the difference correspond to the difference between the externally known press freedom levels of the two countries?

RQ 1 and RQ 1-1 are aimed at roughly identifying the government's influence on the press and the media environment's reaction to that, and at the same time securing basic materials to grasp journalists' perceptions of their media environment. So, these are resolved through case study.

RQ 2 and 2-1 are designed to deduce the media environment of each country by allowing journalists to externalize perceptions of their media environment. Thus, based on the results of the case study, these are resolved through in-depth interview with journalists from each country.

3.4 Methodology

Research methods used to solve research questions are, as a qualitative research method, case study and in-depth interview, which were carried out sequentially.

In the first stage, case study, the researcher collected events in which the independence, autonomy or critical ability of the press were damaged by the governments in South Korea and Germany since 2000, and by categorizing the key elements in each event and creating a database, the researcher identified the substance and tendencies (patterns) of the governments' influence on the press. In the second stage, in-depth interview, with questions based on the results of the case study, the researcher grasped what perception journalists had of their government's influence—in other words, what journalists deemed 'something their government exerted on the press' as—and why they thought so. With this, the researcher understood how journalists from each country perceived their media environment.

In addition, at each stage, the researcher conducted 'pattern-matching' and 'explanation building' as analysis strategies (Yin, 2003, pp. 116-122; Wimmer, & Dominick, 2013, pp 146-147). To be concrete, the pattern-matching strategy was used to find certain tendencies (patterns) in collected cases, while the analytic strategy of explanation building was used to logically explain the tendencies (patterns) identified by the case study and to describe the media environment based on answers from the in-depth interviews.

3.4.1 Case Study

a. Pilot Case Study: Awareness of the Need for including Self-censorship Cases

After setting up the study topic, the researcher collected and looked into some events—i.e. candidate cases—related to the topic prior to launching a full-scale case study. At this time, the researcher figured out that journalists' self-censorship is an outcome of government influence on the press, namely, an act resulting from damage to the autonomy or critical ability of the press. And further, through theoretical study—refer to Part 2.3.2.2.1 and 2.3.2.2.2—it was confirmed that many scholars have already argued that self-censorship should be viewed as an indicator of control or influence over the press (infringement of press freedom).

For instance, Swedish journalism scholars Monica Löfgren Nilsson and Henrik Örnebring (2016, p. 889) argued that it was necessary to add external pressure and threats, which have consequences such as self-censorship professionally, to a discussion of journalistic autonomy. Political scientist Andon Majhosev (2017, p. 100) stipulated self-censorship as well as censorship as a restriction factor for freedom of the media and freedom of information. In 'Methodology Questions'⁶⁹ for Freedom House's *Freedom of the Press*, self-censorship resulting from unofficial guidelines or unspoken rules is specified as an indicator to evaluate the degree of political influence in the content of news media.

US media scholar Edward S. Herman and linguist and philosopher Noam Chomsky (1988, preface xii) pointed out that self-censorship arises not only by reporters and commentators who adjust to the realities of source and media organizational requirements but also by people at higher levels within media organizations who are chosen to implement and have usually internalized the constraints imposed by other market and governmental centers of power. This means that the owners and executives of press companies can be controlled by the government (the powerful), an external factor. Moreover, US journalism scholar Leonard R. Sussman (1989, p. 203) stated that when the pressures or influences—economic, market, political, governmental—on the press are deepened and accumulated, the journalist develops a 'sixth sense' and selects a subject or edits his own material with possible objectors in mind. Sussman called it 'self-restraint' or 'self-censorship'. On the basis of a survey from 74 countries, he argued that self-censorship is apparent in all countries, regardless of their level of freedom. He was able to identify that self-censorship was practiced in almost all (98%) countries without freedom; in about one half (49%) of these nations, the self-censorship was strongly practiced. Even in countries with freedom, strong or some self-

⁶⁹ See Appendix 4.

editorial censorship was reported, which was practiced by people working in newspaper (75%) and broadcasting (radio 68%, TV 71%).

If press companies or journalists report far from the truth for themselves due to pressures or influences from an 'invisible hand' and such an action is defined as 'self-censorship'—although the hand's subject is not clearly identified—this affords a reason for which the self-censorship can be included as one of the sub-types of government influence on the press. So, the researcher viewed the evidence of political(governmental) influence over the press in the case of self-censorship—except for private self-censorship by self-constraint, refer to Part 2.3.2.2.1—resulting from political(governmental) pressures or threats, and concluded that it was necessary to regard it as 'what governments exert on the press'. And in order to pursue the completeness of grasping the phenomena related to the study topic, the researcher included 'self-censorship' events when practically collecting cases.

However, unless 'self-censorship' journalists (media companies) confess or acknowledge their action owing to 'internalization of values' or 'political socialization', there is a problem that it is difficult to detect or prove evidence of self-censorship (Cheung, 2000, pp. 12-13). Furthermore, in terms of journalism, the researcher failed to find a generalized methodology to determine whether journalists practiced self-censorship.

As an alternative to overcoming these problems and limits—that is, the development of operational measures—the researcher took whether a third party (public institutions, other press companies or media organizations) raised a question, or whether a certain reporting conduct deviated from the convention of news reporting or the ethics code of journalism in each country, as criteria for judging self-censorship. And for selected self-censorship cases to ensure the validity of case collection, the basis and reasons for adoption were further described, unlike other cases.

b. Setting up Criteria for Case Selection

Prior to case collection, normative criteria and specific case screening criteria were established to collect events related to the study topic.

Through reviewing preceding studies, the researcher found several keywords that help to comprehensively explain government influence on the press. Those are the PICA (Press Independent and Critical Ability), which Lowenstein (1967) devised for measuring the degree of press freedom, and media autonomy(Medienautonomie), which is one of the theoretical criteria when specifying power relationships between politics and the press based on mutual influences (Choi, 1995). These concepts are still used as normative criteria in the 21st-century global press freedom surveys such as *Freedom of the Press* by Freedom House. In other words, it can be seen that concepts such as independence, autonomy, and critical ability of the press are available to use as a criterion for determining whether governments exert something on the press.

Therefore, this study set up the independence, autonomy, and critical ability of the press as normative criteria to determine whether governments exert something on the press. The researcher gathered events in which these were impaired by the government.

As an empirical tool for case selection after collecting events, the researcher adopted 'Methodology Questions'⁷⁰ devised to measure *Freedom of the Press Index* by Freedom House. The Methodology Questions include indicators that can check whether governments damage the independence, autonomy or critical ability of the press. It also includes questions to determine whether journalists are self-censored.

Most of all, indicators in Freedom House's Methodology Questions have been improved in line with the changing times, and despite the changes, the continuity and coherence of questions have been retained. In addition, the

⁷⁰ Among Freedom House's 'Methodology Questions', the researcher brought 15 questions from two categories—Legal Environment (8), Political Environment (7)—related to the study topic and re-designed them into a checklist as a tool for case screening. See Appendix 6.

Methodology Questions include sub-indicators and individual bulleted guidelines and are quite specific, and are assessed to be applicable to all countries around the world because of the fairly extensive scope of the questions (Schneider, 2014, pp. 14, 42). Thus, it accords with the purpose and direction of this study and is suitable as a tool (a kind of filter) to verify the validity of the case collection.

A criterion for the point of time when a study case could become is that an event has to have arisen or become publicly known after 2000. And the latest cases were adopted with priority to increase the availability of this study results. That is because the case study primarily aims to identify the tendencies of government influence on the press and the responses of the media environment in democratic countries in the 21st century and therefore cases under authoritarian(dictatorial or military) regimes in the past before 2000 do not fit the purpose of this study.

c. Conducting Case Collection

Case collection was carried out by an online article search method via global internet search engine *Google*. In other words, the researcher did not investigate and find out cases but gathered existing cases that have already been reported or revealed by media outlets. To be concrete, after inputting specific and practical keywords⁷¹ in South Korean and German concerning the study topic, the researcher searched for evidence or events of what the governments in the two countries exerted on the press by focusing on articles from prominent press companies, that is, reliable sources. In this way, data for case analysis were collected.

The conditions for case collection were: cases that are worth studying because they were considered a serious problem by a majority of journalists or a press organization like a journalists association and that were reported via media outlets (mass media) causing considerable social impact, and simultaneously, cases that are suitable for analysis because they contain and reveal sufficient factors required to identify the reality of each government's infringement of press freedom. As a result, to collect cases in South Korea and Germany, a convenience sampling out of non-probability sampling methods was used.

In this way, the researcher collected 20 candidate cases each and a total of 40 from South Korea and Germany during four months (Sep. 2017 – Dec. 2017).

d. Verification of the Validity and Reliability of Case Collection

Each of the candidate cases was verified with a checklist for relevance⁷².

In addition, the researcher prepared an additional criterion to ensure the reliability and presented the objectivity of case collection. Each case is corroborated by more than one source such as official recognition of (apology for) conduct by the government, media companies' (journalists') disclosure of facts of the damage caused by the government, or public criticism of an act of the government by third parties such as other media companies, media/civic organizations or the public.

⁷¹ When entering abstract keywords such as 'press control', 'the government's interference in reporting' into the search engine, the search result shows academic materials or papers rather than news and articles. Therefore, taking keywords below as the basis, the researcher flexibly searched by modifying them or by adding specific and practical words likely to be mentioned in articles on events of the government's infringing press freedom.

· Basic search keywords: 방송에 대한 위로부터 지시, 공영방송에서 검열 실행, 미디어를 감시, 보도를 차단·제한하다, 보도를 허가하지 않다, 기자들 배제·제명, 보도 개입·간섭, 보도를 악용하다, 보도를 축소시키다/하찮게 만들다, 왜곡된 기사, 정부가 미디어에 지시를 내린다, 미디어의 관변화·어용화, 정부 친화적 보도, 정부대변인이 공영방송사 대표로, 보도 지침, im Sender Anweisungen von oben geben/bekommen, Medienzensur/Zensur bei den öffentlich-rechtlichen Sendern ausüben/üben, Medien überwachen, Berichterstattung verhindern/ausschalten/beschränken, eine Berichterstattung nicht genehmigen/erlauben, Ausschluss von Journalisten, Eingriff/Einmischung in die Berichterstattung, Berichterstattung missbrauchen, Berichterstattung verkleinern/marginalisieren/bagatellisieren/verniedlichen, ein Artikel wird gesteuert/gelenkt, die Regierung diktiert den Medien den Ablauf, Gleichschaltung der Medien, regierungsfreundliche Berichterstattung, der Chef/Intendant beim öffentlich-rechtlichen Sender als Ex-Regierungssprecher, Medien-Richtlinien/Leitlinien Vorgaben für die Berichterstattung

⁷² The verification results were indicated in the checklist as a tool for case screening by putting checkmarks. See Appendix 6.

Lastly, for final case adoption and confirmation, the researcher asked senior journalists from each country with a high understanding of this study topic to review the collected and selected cases.

In requesting the suitability review of the collected cases, the researcher attempted to contact journalists who were not acquaintances via SNS or e-mail to avoid biased or friendly responses. Also, in order to ensure reviewers' proper understanding of the collected cases and the credibility of their opinions, the researcher sought out reviewers, with priority given to senior journalists who have ever experienced their government's influence in the past and therefore were familiar with the study topic. The South Korean journalist, who carried out the suitability review of 20 South Korean cases, had worked in a private broadcasting company for 34 years as a reporter and journalism scholar. The German journalist, who carried out the suitability review of 20 German cases, had 25 years' experience as a broadcasting reporter, including a career in a German public broadcasting company. In January 2018, the researcher sent one South Korean journalist and one German journalist—one more German added later⁷³—an e-mail requesting a review and opinions on the suitability of selected cases for the purpose of this study, and received an answer from both that 'there is no problem' with the selected cases, via e-mail. With this, through completing the case review by a third party, a total of 40 cases were confirmed for case analysis.

e. Collecting Data from Cases and Categorizing

A frame of categorization was set up to collect data from the cases confirmed finally.

Through content analysis of the cases, the main characteristics obtained in each case were specified as 10 categories and then a frame of 10 analysis categories was completed with *Microsoft Excel*. The frame was created through a deductive approach while analyzing characteristics that appeared in 4-5 cases at the beginning of candidate case collection in South Korea and Germany. With the addition of cases, the analysis categories were modified little by little to eventually establish 13 analysis categories.

When coding the cases according to the 10 analysis categories, the researcher used nominal-level variables made by summarizing and objectifying key elements by case. In the case that it is difficult to organize key elements into a nominal scale or more specific explanation is required, the data was organized in a narrative style.

For case analysis, the 10 analysis categories and the nominal-level variables by category are as follow.

Analysis categories to identify tendencies of government influence on the press (①-⑧)

① Type (Way): even though government influence on the press may vary case by case—that is, it is difficult to generalize in a single word—this is an analysis category to identify the main way in which governments exercised influence over the press.

The frame of type (way) was designed based on the theoretical study—Part 2.3.2.2.2 Types of Press Control—in which it is possible to compare various criteria of type classification presented by preceding studies.

- McQuail (1992) divided social forces to be obstacles to the functioning of media organizations into immediate/direct sources and indirect sources, depending on the extent of influence.
- Lee (1996) presented a proxy way as well as direct and indirect ways as three types of controlling the press by political power (government).

⁷³ For the German cases, the researcher asked one German senior journalist to review the suitability of them just before the final confirmation and received his opinion that they were 'appropriate'. Later, another German reporter with 18 years of experience, who met for an in-depth interview, requested to have a look at the 20 German cases and was provided. At this time, the researcher asked him for the suitability review aiming at reconfirmation, and the German reporter pointed out that two cases seemed to be 'inappropriate'. So, the two cases were replaced with other ones, and the replaced cases were considered 'appropriate'. Thus, the suitability of German cases was reviewed three times by two journalists. The researcher spent relatively more time to confirm the suitability of German cases than those of South Korea.

- Chung (1998) focused on press control by the government and divided this into official control and unofficial control depending on whether the control follows legal and institutional procedures.
- Cho (2017) presented self-censorship as one of the unofficial and internal ways among the ways of control centered on media companies.

The researcher referred to each of the above criteria for type classification and combined the classification criteria and reorganized them critically in accordance with the purposes of this study. In this way, five types were defined as follows, based on the nature(degree) and characteristics in government influence on the press.

Official (following legal/institutional procedures)	Direct way Indirect way Proxy way
Unofficial (by elusive/expedient measures)	Interference in reporting Self-censorship under government influence

- Direct way: the government directly and officially threatens the press in accordance with laws and institutional procedures (e.g., threats and terrorism against press companies or journalists, lawsuits for defamation and dissemination of false information, investigations for violations of the National Security Law, tax investigations of press companies or their holding/affiliated companies, issuance of news guidelines and censorship of media, restriction or prohibition on covering and broadcasting/publishing, surveillance of journalists, nationalization of press companies).
- Indirect way: the government imposes indirect or circumstantial pressure on the press by providing/discontinuing social or economic benefits (e.g., grants/withdrawal of social or economic support to press companies or journalists in the form of subsidies, provision/suspension of tax relief or financial benefits, guarantee of monopoly or oligopoly).
- Proxy way: the government imposes pressure on the press through pro-government figures or agencies that can act as its substitute. It is possible for the government to closely and deeply control press companies especially through pro-government executives inside the firm (e.g., appointment of a pro-government figure as the head of a public broadcaster, disciplinary actions by taking advantage of pro-government agencies or commissions that deliberate on and sanction media's reporting).
- Interference in reporting: the government informally affects a series of processes by which press companies produce and transmit information products such as news and articles. In this way, the government directly interferes in the content and form of news reporting (e.g., calling press companies for news reporting biased towards the government or the powerful, requesting the expansion of favorable news about the regime and the reduction or deletion of unfavorable news to the regime, demand for a change in the reporting direction or plan).
- Self-censorship under government influence: this is a type that reflects the pilot case study as well as the review of preceding studies. Press companies or journalists, being aware of the situation or atmosphere under pressure from the government, adjust the content (intensity of criticism) and form of their reporting so as not to irritate the government. Such an act results from the government that indirectly and informally influences the press (e.g., expansion/launch of news reporting and programs biased towards the government and the powerful, restraining/ending unfavorable news reporting and programs to the regime).

The five types outlined above are schematized as follows, just like McQuail had schematized the influence of media environment factors.

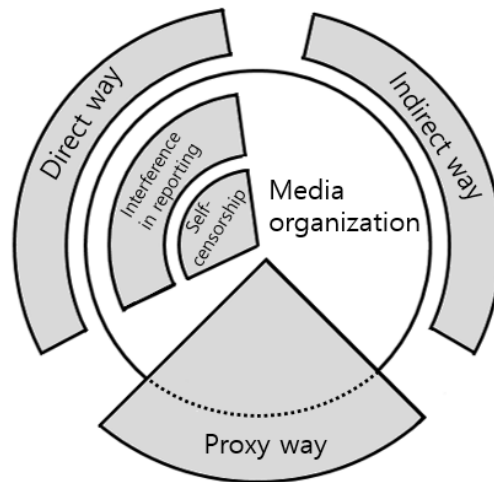


Figure 15 5 types (ways) of government influence on the press (Schema)

Some people may disagree with this study’s classification of the five types (ways) of government influence on the press. That is because there can be differing opinions on whether economic control by the government is a political(governmental) or economic control, whether self-censorship by a press company in the situation where the government is dominating the press—by involvement in the appointment of executives—is regarded as government control or internal(autonomous) control. In order to avoid controversy due to such differing opinions, when collecting cases, the researcher considered the subject, who initially planned and directed the ‘influence’, and the fundamental intention of the ‘influence’ and then judged the type (way) of each case.

② Target: this is the category for determining what media the government targeted primarily. In this category, media were divided into public and private according to the ownership structure and also into broadcast media (e.g. TV, radio) and print media (e.g. newspapers) according to the reporting form. Additionally, for a more detailed analysis, domestic/foreign, media/individual journalist, etc. were also added as nominal variables.

- Domestic public TV
- Domestic public radio
- Domestic semi-public TV
- Domestic public and semi-public TV
- Domestic public and private TV
- Domestic public and private TV reporters
- Domestic public and private media
- Domestic private TV
- Domestic private newspaper
- Domestic private news agency
- Domestic private online media (blog/website)
- Domestic individual journalists
- Domestic and Foreign individual journalists
- Foreign major media

③ Macroscopic intention (reason or purpose): this is the category to determine whether government influence on the press was implemented as a follow-up/reactive measure in retaliation against the specific news report, or as a pre-emptive/planned measure for crisis management. This allows the determination of the passive or active nature of government influence, based on the timing of government influence over reporting.

- Follow-up/Reactive measure
- Pre-emptive/Planned measure

④ Communication means (Methods of intention delivery for exerting the influence): this is the category to identify the process/way in which the government conveyed or expressed its will when it tried to exert its influence on the press.

Statement in public Instructions in public (according to institutional procedures) Pressures in public Instructions in private (according to institutional procedures) Pressures in private Requests for cooperation in private Call in person Self-censorship

However, because case collection and analysis were carried out through an online article search method, there were some cases in which the communication paths or methods were revealed but others where these were not so. In the latter case, the researcher inferred the communication means from the chain of command between the government agency in charge of the exertion of government influence (executive agency) and its parent agency.

⑤ Executors: this is the category to identify figures, agencies, organizations that actually got involved in exerting government influence on the press, in line with a plan or directive. In both South Korea and Germany, the executors were so varied that nominal variables could not be set; so, specific executors for each case were described without a nominal variable.

⑥ Results: this is the category to determine how government influence on the press was actually executed and what impact it had on press companies and journalists. In both South Korea and Germany, the execution results were so varied that nominal variables could not be set; so, specific values were written for each case.

⑦ Attainment of an aim or not: this is the category to identify whether government influence on the press was finally successful or failed. This is to confirm whether government influence was routinely and naturally accepted or there was any resistance or movement against it. The nominal variables were set to when the government, by exerting its influence, completely achieves its objective, when it only partially succeeds, when it fails.

Success Partial Success (Partial Failure) Failure

⑧ Timing of government influence: this is the category to identify when government influence on the press was concentrated. The timing or duration of government influence for each case was described as specifically as possible.

Analysis categories to identify media environment responding to government influence (⑨-⑩)

⑨ Visibly responsive (resistant) subjects: this is the category to determine which media environment factors showed visible resistance to government influence through exposure or protest. The nominal variables were made in detail to reflect all of the resistant subjects, which were revealed through the case collection.

Targeted media company or journalist Other media companies Media/Civic organizations The new government after a regime change (confession) The public (criticism, rally, demonstration)

⑩ Timing of visible response (resistance): this is the category to determine the point of time when media environment factors visibly resisted against government influence. This is to grasp whether the media environment

was aware of what the government exerted and had the will to criticize/resist it. The timing of visible resistance for each case was described as specifically as possible.

f. Case Analysis

After creating the datasheets for South Korea and Germany through collecting data and categorizing, the researcher carried out a month-long analysis of the data to identify the tendencies (patterns) of the governments' influence on the press.

In addition, the nominal variables by analysis category were assorted and graphically plotted. In this process, the researcher found specific tendencies (patterns) and made a provisional case study report on them. This material was used to create questions for the subsequent in-depth interview.

20 cases in which the South Korean government exerted influence on the press

1. Direct way (4 cases)

1-1. (Park Geun-hye government) The President directly denounced and threatened a private newspaper that exposed the regime's corruption. Subsequently, government institutions put all-out pressure on the private newspaper company.

- On November 28, 2014, the private newspaper (Segye Ilbo) exclusively reported confidential documents proving the existence of President Park's secret adviser (Jeong Yoon-hoe, a power broker). President Park directly denounced the newspaper, and presidential secretaries immediately accused the CEO (Cho Han-kyu) and journalists belonging to the newspaper. Afterwards, the prosecution summoned and investigated, for defamation charges, the CEO as well as the journalists who had written the article, and the National Tax Service conducted a special tax investigation of sister companies related to the newspaper. On January 29, 2015, a high-ranking government official called the owner of the newspaper and forced the CEO's dismissal. One month later, the CEO (Cho Han-kyu) of Segye Ilbo was fired.

See the below article revealed on November 28, 2014.

<http://www.segye.com/newsView/20141127005381>

1-2. (Lee Myung-bak government) The Executive Office of the President and the related government department sued a public broadcaster that brought up a problem with government policy.

- On April 29, 2008, the public television MBC's current affairs program (PD Notebook) raised a problem with the government's US beef import policy through a broadcast titled 'Are US beef safe from mad cow disease?'. Immediately after the program was broadcasted, the Blue House accused the program's staff of false facts and defamation. The related government department (Ministry for Food, Agriculture, Forestry and Fisheries) and the retired minister (Jeong Woon-chun) asked the prosecution to investigate the current affairs program. On April 8, 2009, the prosecution tried to search and seize the program production office, but it failed as the MBC labor union resisted. On July 16, 2008, the Commission responsible for press sanctions (Korea Communications Standards Commission) directed MBC to apologize to viewers in relation to the broadcast content.

See the below articles showing the course of this case (29.4.2008-20.9.2011).

<http://www.mediaus.co.kr/news/articleView.html?idxno=2684>

<https://news.joins.com/article/6116116>

1-3. (Lee Myung-bak government) Through illegal surveillance, a government department gained information on actions inside public and semi-public broadcasters, and the Blue House, which received this information, was involved in each media company's personnel appointments of executives.

- Since November 2008, the Blue House has directed the Office of the Prime Minister to gain information on inside movements of KBS and YTN; which is not the original mission (civil servants' corruption surveillance) of the Office of the Prime Minister. Based on the information received from the Office, the Blue House mandated YTN's CEO appointment of Bae Seok-gyu as well as the resignation of Koo Bon-

Hong. On December 2, 2009, the Blue House received information on the newly appointed CEO (Kim In-Kyu) of KBS. This illegal surveillance was disclosed on March 22, 2012 by the KBS labor union's exposure, nevertheless, the Blue House's Chief who gave instructions for this illegal surveillance was not punished. See the below news. This case had lasted from 11.2008 to 12.2009.

<http://newstapa.org/235>

https://youtu.be/IML_y6uUZmM

1-4. (Lee Myung-bak government) Through the National Intelligence Service, the Executive Office of the President inspected/surveilled public broadcasters' inside actions and heard the briefing on plans for dominating public broadcasting.

- The National Intelligence Service led by Won Sei-hoon, the closest aide of President Lee Myung-bak, inspected/surveilled inside actions of public broadcasters (KBS, MBC) and frequently reported plans (scenarios) for dominating public broadcasting to the Blue House. The scenarios were realized in the public broadcasters, when the President's associates were appointed as CEOs of the public broadcasters.

See the below article showing the course of this case (03.2010, 06.2010, 01.2012).

<https://www.yna.co.kr/view/AKR2017091818200001>

2. Indirect way (None)

- Even though this type of governmental press control was expected to exist, there was no remarkably relevant case when compared to the other four control types. Moreover, even in some cases which could be regarded as indirect press control, there is not enough coding factors required for analysis and also there are limitations in collecting analysis factors, which were consequently inappropriate for the case study.

* (Lee Myung-bak government) Yonhap News Agency, designated as a 'key national news agency' in 2003, received 30 billion won (about 2,817,000 dollars) from the government annually from September 2003 to August 2009. However, in April 2009, the law on temporarily subsidizing the news agency was amended, so the news agency became able to continue to receive government subsidies. Since then, criticism has been continuing that articles of the news agency are sometimes favorable to the government and ruling party. This is a case of key national news agency subordinating to the government funding.

* (Lee Myung-bak government) When the government departments requested newspaper companies for policy advertisements in July 2008, they paid more advertising money to pro-government conservative newspaper companies than to progressive newspaper companies. This is a case of discrimination against economic income/benefits on the ground of regime-friendly inclination.

3. Proxy way (4 cases)

3-1. (Lee Myung-bak government) The President's closest associate was appointed Chairman of the commission involved in appointing the Heads of public broadcasters and sanctioning the press. This was the so-called 'parachute appointment of the regime'.

- On February 29, 2008, President Lee Myung-bak pushed ahead with the appointment of his political advisor (Choi See-joong) as Chairman of the Korea Communications Commission, despite opposition from media organizations and opposing parties on the ground of being 'a hindrance to political independence of broadcasting'.

See the below article dealing with the aftermath of this case that arose on February 29, 2008.

<http://www.mediaus.co.kr/news/articleView.html?idxno=1874>

3-2. (Lee Myung-bak government) The President's associate who helped the President's victory in the presidential election was appointed CEO to a semi-public broadcaster. This was the so-called 'parachute appointment of the regime'.

- When media specialist Koo Bon-hong, who helped Lee Myung-bak's victory in the 17th presidential election, ran for YTN's CEO in May 2008, YTN board of directors appointed him as CEO despite strong opposition of employees.

See the below article dealing with this case that arose on May 29, 2008.

http://www.ohmynews.com/NWS_Web/View/at_pg.aspx?CNTN_CD=A0000913318

3-3. (Lee Myung-bak government) The President's associate who helped the President's victory in the presidential election was appointed to a public broadcaster's CEO. This was the so-called 'parachute appointment of the regime'.

- When media specialist Kim In-kyu, who helped Lee Myung-bak's victory in the 17th presidential election, ran for KBS's CEO in November 2009, KBS board of directors recommended him as CEO without verification, despite strong opposition of employees. Then, President Lee appointed him as KBS's CEO.

See the below articles dealing with this case that arose on November 23, 2009.

<http://www.mediatoday.co.kr/news/articleView.html?idxno=84325>

<http://www.pressian.com/news/article/?no=39279>

3-4. (Lee Myung-bak government) A journalist who was on intimate terms with the President was appointed CEO to a public broadcaster. This was the so-called 'parachute appointment of the regime'.

- When journalist Kim Jae-cheol, who was on intimate terms with President Lee Myung-bak, ran for MBC's CEO in February 2010, he was appointed as new CEO with overwhelming votes from the ruling party-side directors within MBC.

See the below articles exposing behind stories of this case that arose on February 26, 2010.

http://www.hani.co.kr/arti/society/society_general/524120.html

<https://mbcunion.wordpress.com/2012/05/17/2007년-대선-당시-김재철은-이명박-캠프-비밀-조직원>

4. Interference in reporting (6 cases)

4-1. (Park Geun-hye government) The senior presidential press secretary directly contacted the news bureau chief of a public broadcaster and gave a reporting-direction.

- On April 16, 2014, when a mass casualty incident (the Sewol ferry disaster, 304 deaths) happened, the Presidential Senior Secretary for public information (Lee Jung-hyun) directly called the Chief (Kim Si-gon) of the KBS news bureau twice and instructed him to stop reporting criticism against the government. Chief Kim rejected the instruction, but his boss, KBS's CEO Gil Hwan-young accepted and followed it. After a few days, Chief Kim resigned, exposing the interference in reporting by Presidential Senior Secretary Lee. After the revelation, Presidential Senior Secretary Lee resigned, and KBS's CEO Gil was dismissed amid criticism from the public. (3 years and 8 months later) In December 2017, former Presidential Senior Secretary Lee was prosecuted for violation of the Broadcasting Act.

See the below articles showing the course of this case (21.4.2014, 30.4.2014).

http://news.khan.co.kr/kh_news/khan_art_view.html?artid=201606301405001&code=940100#csidx7f12144d577f0b98f666089b42f4215

https://www.huffingtonpost.kr/2016/07/04/story_n_10799510.html

4-2. (Park Geun-hye government) The Presidential Executive Office interfered in dozens of news reporting over a long period of time, using the CEO of a public broadcaster as a gateway.

- The Presidential Senior Secretary for public information ordered pro-government reporting from time to time. In accordance with such orders, KBS's CEO Gil Hwan-young instructed staff to report favorable news regarding the government and President Park Geun-hye. In 2013, the first year of the Park government, KBS's CEO Gil revised news according to orders from the Presidential Executive Office (Blue House) more than 30 times.

See the below article. This case had lasted from 01.2013 to 05.2014.

<http://news1.kr/articles/?2707063>

4-3. (Lee Myung-bak government) A presidential aide directly called the chief editor of a private newspaper to ask not to report his own corruption-related article.

- In April 2008, immediately after the inauguration of the Lee Myung-bak government, the Presidential Spokesman (Lee Dong-kwan) got a hint that the private newspaper (Kukmin Ilbo) would report his illegal purchase of real estate, so he directly called the Chief Editor (Byun Jae-woon) of the newspaper and asked Chief Byun not to report the corruption-related article. He succeeded. But the next day, the newspaper company's labor union uncovered and revealed the fact that the Presidential Spokesman had made such a

request to the Chief Editor. Nonetheless, Presidential Spokesman Lee and Chief Editor Byun stayed in office without resignation.

See the below articles dealing with this case that arose on April 28, 2008.

<http://www.mediatoday.co.kr/?mod=news&act=articleView&idxno=67922>

<https://www.nocutnews.co.kr/news/444069>

4-4. (Lee Myung-bak government) The presidential spokesman directly contacted the news bureau chief of a semi-public broadcaster and demanded revisions to the video that satirized the government. As the news bureau chief accepted the demand for revisions, broadcasting of the video was temporarily suspended.

- On March 7, 2008, immediately after the inauguration of the Lee Myung-bak government, semi-public broadcaster YTN's video news program <Pop-Up> satirized the media briefing of the Presidential Spokesman through the content titled 'Minority Report'. Soon after, the Presidential Spokesman (Lee Dong-kwan) directly contacted the Chief (Hong Sang-pyo) of the YTN news bureau and demanded revisions to the video content. In accordance with the demand, Chief Hong ordered a PD, who produced the video content, to re-edit it. However, as the PD refused his order, he even gave an order to stop broadcasting the program. Shortly afterwards, however, the original video was broadcasted again due to the protests by YTN's labor union and the viewer, and the order of YTN's CEO (Pyo Wan-soo).

See the below article showing the course of this case that arose on March 7, 2008.

http://www.ohmynews.com/NWS_Web/view/at_pg.aspx?cntn_cd=A0000856018

4-5. (Lee Myung-bak government) The National Intelligence Service's agents respectively met the news bureau chief of a public broadcaster and the CEO of a private broadcaster, and asked them not to report unfavorable news and to report favorable news to the government.

- On May 7, 2009, an article on unfair practices by the National Intelligence Service was published in a leading daily newspaper (Chosun Ilbo). On the same day, NIS's agent handed the Chief (Ko Dae-young) of the KBS news bureau 2 million won (about 1,800 dollars) in cash and asked him not to broadcast the article content in the KBS main news program on the day. It succeeded. In the same period, four agents of NIS visited private broadcaster SBS's CEO (Ha Geum-yeol) and asked him to actively report the corruption scandal of the former President (Roh Moo-hyun).

See the below articles showing the course of this case (7.5.2009, in early 2009).

<http://www.mediatoday.co.kr/?mod=news&act=articleView&idxno=139421>

<http://www.mediatoday.co.kr/?mod=news&act=articleView&idxno=139425>

4-6. (Park Geun-hye government) When beginning to investigate the corruption of the government in earnest, the Presidential Executive Office and National Intelligence Service provided a conservative private newspaper with specific information and asked the newspaper company to report an article like a red herring for a reversal of the situation.

- On April 4, 2013, the Prosecutor General (Chae Dong-wook) was sworn into office and he instructed his staff to thoroughly investigate the case in which the Director of the National Intelligence Service (Won Seihoon) commanded NIS's agents to intervene in the election through public opinion manipulation during the presidential election in 2012. On June 14, 2013, the Prosecution indicted former Director Won for violation of the election law. From that time, the Presidential Executive Office (Blue House) and NIS gathered alleged corruption information about Prosecutor General Chae. On September 6, 2013, the conservative private newspaper (Chosun Ilbo) published the scoop article about Prosecutor General Chae's scandal in which he had an out-of-wedlock child. The content of the newspaper article exactly corresponded to the personal information of Prosecutor General Chae collected by the Blue House and NIS. After the scandal broke out, the Presidential Senior Secretary for civil affairs (Hong Kyung-shik) and the Justice Minister (Hwang Kyo-ahn) put pressure on Prosecutor General Chae to resign voluntarily. In the end, a week after the scandal article was published, Prosecutor General Chae resigned on September 13, 2013.

See the below articles showing this case that arose on September 6, 2013.

<http://news.chosun.com/tw/?id=2013090600272>

http://www.hani.co.kr/arti/politics/politics_general/824788.html

5. Self-censorship under government influence (6 cases)

5-1. (Lee Myung-bak government) A public broadcaster's CEO demanded a preview (pre-censorship) of its current affairs program which included critical content toward the government. The production team rejected it, and the CEO put the program's broadcasting on hold.

- On August 17, 2010, public broadcaster MBC's current affairs program (PD Notebook), which planned to raise a problem with the government's development policy through the content titled 'Four Major Rivers Restoration Project: Secret of six-meter water depth', was scheduled to broadcast in the evening. On the same afternoon, MBC's CEO (Kim Jae-cheol) demanded a preview of the program content. However, the production team refused it on the ground of the CEO's abuse of authority, and CEO Kim put the program's broadcasting on hold. Protests by MBC's labor union and the viewers were intense but, nonetheless, CEO Kim achieved his demands for the content revision through the preview and then allowed the program to broadcast. The program's PD (Choi Seung-ho) who produced the critical content toward the government was relegated to another department in March 2011 and afterwards, was fired for reason of having led the long-term strike in March 2012.

See the below article showing this case that arose on August 17, 2010.

<http://www.pressian.com/news/article/?no=101679>

5-2. (Lee Myung-bak government) The CEOs of public broadcasters abolished a current affairs program and a media criticism program that criticized the government, ruling party, and conservative media.

- In August 2008, public broadcaster KBS's CEO (Lee Byung-soon) was appointed and just 2 months later, he decided to abolish a media criticism program (Media Focus) and a current affairs program (Live Current Affairs Tonight) which had led criticism of the government, ruling party, and conservative major newspapers, despite strong opposition of employees. In February 2010, public broadcaster MBC's CEO (Kim Jae-cheol) was appointed and 7 months later, he pushed ahead with the abolishment of two current affairs programs (News Plus, World Wide Weekly) which had led criticism of the government, despite strong opposition of employees.

See the below articles showing this case that arose in October 2008 and in September 2010.

<http://www.pressian.com/news/article/?no=91663>

<http://www.mediatoday.co.kr/news/articleView.html?idxno=90816>

5-3. (Park Geun-hye government) The chief general manager of the news editing department in a semi-public broadcaster ordered his staff to stop broadcasting the scoop report about corruption in the National Intelligence Service. At that time, the chief of the news bureau condoned the chief general manager's irrational order.

- On June 20, 2013, immediately after the inauguration of the Park Geun-hye government, semi-public broadcaster YTN broadcasted the scoop report showing proof that the National Intelligence Service had interfered in politics and manipulated public opinion. In a few hours, the report created great reactions from society. However, the Chief general manager of the YTN news editing department (Im Jong-yeol) ordered his news-editing PDs not to broadcast the report any more, saying the report's content was difficult to understand and ambiguous. At that time, the Chief of the news bureau chief (Lee Hong-ryeol) condoned the Chief general manager's decision/action. A month later, in July 2013, the reporter who wrote the scoop report was awarded the 'Broadcast Journalist of This Month' but gave up writing follow-up reports.

See the below articles showing this case that arose on June 20, 2013.

https://www.ytn.co.kr/_ln/0103_201306200502328969

<http://www.mediaus.co.kr/news/articleView.html?idxno=35128>

5-4. (Park Geun-hye government) A general manager responsible for an investigative journalism program in a public broadcaster ordered a subordinate reporter to revise an article about corruption in the government several times and decided not to report the article on the pretext that the reporter rejected his final order.

- In late May 2013, immediately after the inauguration of the Park Geun-hye government, public broadcaster MBC's investigative journalism program (Current Affairs Magazine 2580) decided to prepare an article about the National Intelligence Service intervening in the election for public opinion manipulation during the presidential election in 2012. However, the program's general manager (Shim Won-taek) ordered a subordinate reporter to revise the article several times including deletion of crucial/essential content, giving

unreasonable reasons that the subordinate reporter could not be convinced. Then he arbitrarily decided not to broadcast the article when the reporter rejected his final order. Eventually, the corresponding article was not reported on June 23, 2013, when the broadcasting was scheduled.

See the below articles showing the course of this case that arose on June 23, 2013.

http://www.hani.co.kr/arti/politics/politics_general/593034.html

<http://www.mediatoday.co.kr/news/articleView.html?idxno=110413>

5-5. (Lee Myung-bak government) Top-level executives of public broadcasting decided and pushed ahead with the regularization of ‘Presidential Speech Broadcast’ despite strong opposition of employees.

- (After KBS’s CEO Jung Yun-joo was expelled under government pressure) On August 27, 2008, a new CEO (Lee Byung-soon) was appointed in public broadcaster KBS. Two months later, when the Presidential Executive Office (Blue House) released the master plan of presidential radio speech, KBS accepted the plan and broadcasted the first radio speech of President Lee Myung-bak on October 13, 2008. In the following month, top-level executives of KBS decided and implemented the regularization of presidential radio speech despite its labor union’s strong opposition and concerns. Since November 3, 2008, the presidential radio speech had been broadcasted through KBS, every other week 109 times for four years and five months until President Lee left office. On the other hand, other public and private broadcasters did not broadcast the presidential radio speech.

See the below articles. This case had lasted from 10.2008 to 02.2013.

<http://www.mediatoday.co.kr/?mod=news&act=articleView&idxno=73460>

http://www.ohmynews.com/NWS_View/at_pg.aspx?CNTN_CD=A0000999278

5-6. (Park Geun-hye government) The chief of the news bureau in a public broadcaster consistently issued reporting guidelines that banned employees from producing/broadcasting unfavorable articles to the government. Middle-level executives forced employees to follow such unfair directives.

- MBC’s Chief of the news bureau (Kim Jang-gyeom) had consistently issued reporting guidelines that instructed employees to ban the production of articles and the use of videos/images which were unfavorable to the government. For example, the fact that the National Intelligence Service’s Director (Won Sei-hoon) commanded NIS’s agents to intervene in the election through public opinion manipulation during the presidential election in 2012; the Sewol ferry disaster resulted in 304 deaths on April 16, 2014; the incident in which an aged protester was seriously injured by the police’s excessive suppression on November 14, 2015; the articles that exposed the scandal in which President Park’s secret adviser (Choi Soon-sil, a power broker) had engaged in presidential affairs as well as government policies, since the inauguration of the Park Geun-hye government in 2013, etc. Following Chief Kim’s instructions, managers forced employees to carry out unfair directives. If they refused, they were relegated to another department or had disadvantages in personnel appointments. On October 31, 2017, MBC’s labor union exposed such unfair directives and reporting guidelines, and Kim Jang-gyeom, who had become MBC’s CEO, was dismissed for issuing unfair labor orders on November 13, 2017.

See the below articles showing the course of this case that had lasted from 08.2013 to 02.2017. Even until just before the impeachment of President Park Geun-hye.

<http://www.mediatoday.co.kr/?mod=news&act=articleView&idxno=139545>

<http://www.journalist.or.kr/news/article.html?no=42887>

* Basis and reasons for viewing South Korean events 5-1, 5-2, 5-3, 5-4, 5-5, 5-6 as self-censorship cases:

In regard to the so-called ‘government’s dominance of broadcasting’ events that had occurred over a period of nine years of Lee Myung-bak and Park Geun-hye governments (2008-20013, 2013-2017), the ruling party after the regime change demanded an investigation to find the truth of the events from the opposition party (past ruling party) and submitted a written request to the National Assembly on September 15, 2017⁷⁴ (Woo et al., 2017).

Among 37 events within the written request formally submitted to the National Assembly as a public institution, the researcher selected events that feature self-censorship elements. Therefore, problem-raising

⁷⁴ See Appendix 7 for the written request for a parliamentary investigation.

by a third party (public institution) and the formal document (written request) were the basis in selecting six cases of South Korean self-censorship.

20 cases in which the German government exerted influence on the press

1. Direct way (12 cases)

1-1. The Federal Chancellor's Office restricted unfavorable coverage and reporting to the Federal Chancellor in advance.

- On May 12, 2015, before Federal Chancellor Angela Merkel visited Röntgen-Schule in Berlin, the Federal Chancellor's Office banned reporters from covering and filming the situation in which Chancellor Merkel answers an embarrassing or unfavorable question. Therefore, public broadcaster ARD reported the edited news on the day with regard to the event attended by Chancellor Merkel. Although ARD editors documented the fact that "we tried to cover the Chancellor's answer but it was blocked" and exposed the restriction of coverage by the Federal Chancellor's Office, it was not widely known because of their passive action.

See the below article showing this case that arose on May 12, 2015.

<https://www.welt.de/debatte/henryk-m-broder/article140890094/Warum-die-ARD-Merkels-Antwort-nicht-zeigen-darf.html>

1-2. The Federal Ministry of the Interior attempted to steer a reporting-direction regarding a sensitive issue.

- On October 24, 2016, the Federal Ministry of the Interior invited the Editors-in-Chief and Publishers of German media companies to a workshop which would be hosted at the beginning of the following year by Muslim associations. The Ministry explained in a press release that the gathering would be an opportunity to understand each other, but it became known that the hidden intention in the invitation of the Minister (Thomas de Maizière, CDU) was to discuss reporting standards regarding Muslims with the representatives of media companies at the workshop and coordinate them. On November 11, 2016, the working group of German public broadcasting editorial committees (AGRA) criticized the government's attempt to interfere in reporting and emphasized religious neutrality and press freedom and boycotted the workshop. In the end, the Ministry's attempt failed.

See the below materials showing the course of this case that arose on October 24, 2016.

<https://www.bmi.bund.de/SharedDocs/pressemitteilungen/DE/2016/10/treffen-mit-vertretern-muslimischer-verbaende.html>

<http://www.agra-rundfunk.de/wordpress/?p=411>

1-3. The government authorities did not permit coverage by journalists which may have a diplomatic negative impact.

- Ahead of the G20 Hamburg summit in July 2017, the Federal Press Office (BPA) suddenly revoked accreditation for 32 journalists including foreign journalists. A spokesperson for the Federal Ministry of the Interior (BMI) explained the situation as security concerns/problems. However, as the fact that most of the excluded journalists worked for the left-wing press or had ever negatively portrayed Turkish government was known, the suspicion that the German government excluded unfriendly journalists towards the Turkish government in order to maintain friendly diplomatic relations with Turkey, was raised. Later on August 21, 2017, the Federal Ministry of the Interior apologized for the 'mistaken revocation of accreditation' that attributed to faulty data from the Federal Criminal Investigation Office (BKA). But there were articles which gave proof that some data which provided the basis for the revocation of accreditation came from the Turkish government. This supports the possibility of deliberate restriction of coverage by the government authorities. See the below articles showing this case that arose in July 7, 2017.

<https://www.sueddeutsche.de/medien/pressefreiheit-journalisten-werden-offenbar-seit-zehn-jahren-beobachtet-1.3584288>

<https://www.tagesspiegel.de/gesellschaft/medien/g20-verbot-fuer-journalisten-entzug-der-akkreditierung-wegen-falscher-bka-daten/20217780.html>

1-4. There are government-biased unofficial news guidelines (unspoken rules) on specific topics within a public broadcaster.

- On January 17, 2016, when a steadily employed freelance (fest-frei) journalist working for WDR appeared

on the Dutch radio program (Limburg “De Stemming”), she accidentally said there were instructions on the broadcaster to report refugee-related issues more positively, in favor of the government. Furthermore, she said it was routine for journalists at German public broadcasters to report positively on refugee policy of the Merkel government. Her interview—exposing the existence of undocumented reporting guidelines issued by the government in public broadcasters—was not reported through German public broadcasting. Since then she had been out of the role of a journalist for more than a year and eventually left WDR.

See the below articles. This case was revealed on January 17, 2016.

<https://uebermedien.de/1046/wdr-mitarbeiterin-bestaetigt-und-dementiert-tendenzioese-berichte>

<https://deutsch.rt.com/inland/55476-exklusiv-wdr-journalistin-regierungsfreundliche-berichterstattung>

1-5. The Federal Ministry of the Interior suddenly shut down a left-wing internet website on the grounds that it has helped exchange information among left-wing extremists and led extreme propaganda itself.

- On August 25, 2017, the Federal Ministry of the Interior regarded internet website *Linksunten.indymedia.org* as “the most influential internet platform for violent left-wing extremists in Germany” and classified the website’s managers as “one group” and then announced the dissolution of this group based on the law on associations. The Federal Interior Minister (Thomas de Maizière, CDU) asked the Interior Ministry of the state government (Ministerium für Inneres, Digitalisierung und Migration Baden-Württemberg / Thomas Strobl, CDU), which controls corresponding local media including websites, to shut down *Linksunten.indymedia.org*. In this regard, the press criticized, “this is an infringement of press freedom and violation of the Constitution, and also political intentions are hidden there” because the Federal Ministry of the Interior arbitrarily stretched the meaning of the law and thereby closed the left-wing internet website with abuse of authority (arrogation).

See the below materials showing this case that arose on August 25, 2017.

<https://www.bmi.bund.de/SharedDocs/pressemitteilungen/DE/2017/08/vereinsverbot.html>

<https://www.reporter-ohne-grenzen.de/pressemitteilungen/meldung/rechtsstaatlich-fragwuerdiges-verbot/>

1-6. The Federal Intelligence Service has collected information on foreign media including journalists and newsrooms and has surveilled them.

- Private media *SPIEGEL* exclusively reported that since 1999, the German Federal Intelligence Service (BND) has collected information on numerous journalists and editors worldwide including foreign major media such as *BBC*, *New York Times* and *Reuters* and has surveilled them. For example, the surveillance targets included more than a dozen *BBC* lines in Afghanistan and Central London. Editorial offices of the *BBC World Service* program were also monitored. A line of the *New York Times* in Afghanistan was on the list as well as lines of mobile and satellite telephones of the news agency *Reuters* in Afghanistan, Pakistan and Nigeria. In this way, the BND reportedly monitored at least 50 telephone and fax numbers or email addresses of journalists or newsrooms worldwide. ‘Reporters Without Borders’ German branch accused BND of infringing press freedom and violating the Constitution.

See the below articles revealed on February 24, 2017 and the reaction to this case.

<https://www.spiegel.de/politik/deutschland/bnd-bespitzelte-offenbar-auslaendische-journalisten-a-1136134.html>

<https://www.reporter-ohne-grenzen.de/pressemitteilungen/meldung/bnd-verstoest-gegen-pressefreiheit/>

1-7. The state government revoked permission for coverage due to concerns about unfavorable reporting on a specific issue.

- The leader of the Hessen state opposition SPD, accompanied by journalists, was given prior permission for an on-site inspection of refugee accommodations inside the local Kassel-Calden airfield on August 4, 2015. But the regional administrative authorities (Regierungspräsidium Kassel) under the Hessen state government (state Prime Minister Volker Bouffier, CDU) suddenly notified journalists of the cancellation of their permission the night before. The spokesperson (Michael Conrad, Sprecher des Regierungspräsidiums der schwarz-grünen Koalition in Kassel) straightforwardly said on the basis of past bad experiences, “It is absolutely clear that we do not want to expose people who have fled to cameras”. In other words, that was because media coverage’s theme was only a complaint and thereby such scenes, from the viewpoint of the states, could give the public a negative impression and furthermore cause criticism of the federal government. See the below articles showing the course of this case that arose on August 3, 2015.

<https://www.hna.de/lokales/hofgeismar/calden-ort74694/fluechtlinge-spd-chef-haelt-presse-ausschluss-falsch-5319368.html>
<https://www.welt.de/politik/deutschland/article145201789/Politik-verhindert-Berichterstattung-ueber-Asylheime.html>

1-8. The military authorities surveilled journalists to block reporting that was unfavorable to a particular private corporation supplying arms as well as themselves.

- Private media *SPIEGEL* exclusively reported the fact that the Federal Ministry of Defence (BMVg) asked the relevant intelligence service to surveil journalists in order to prevent negative reporting on faulty weapons. When there was a rumor that the standard rifle (G36) used by the German Federal Armed Forces (Bundeswehr) had faults, the management of the arms manufacturer (Heckler & Koch), which has been producing and supplying the rifles (176,000 units supplied in 20 years), requested surveillance on journalists who belonged to *Spiegel Online*, *Die Zeit* and *Die Tageszeitung*, through a proposal (“Gewehr G36 - Genese”). Then, high-ranking officials of the arms procurement division within the Federal Ministry of Defence asked the Military Counterintelligence Service (MAD) to investigate/surveil journalists who had written a critical article about defects in the rifle. MAD President, Ulrich Birkenheier, declined the request from the high-ranking officials on 23 December 2013. However, at an internal hearing on December 9, 2014, an official (Thomas L.) who had been dealing with the G36 for years at the Defence Technology Center for Bundeswehr (WTD 91) testified that the MAD had surveilled journalists in 2011 or 2012.

See the below article revealed on May 6, 2015.

<http://www.spiegel.de/politik/deutschland/g36-geheimdienst-mad-sollte-journalisten-ausspaehen-a-1032454.html>
<https://www.spiegel.de/politik/deutschland/g36-afaeere-mad-ermittelte-offenbar-doch-a-1038015.html>

1-9. The Federal Prosecution investigated journalists (online bloggers) who disclosed unfavorable information about the federal government on treason charges.

- When a journalist for an online blog (*netzpolitik.org*) posted information about a federal secret agency’s plans to expand internet surveillance and the agency’s financing in February and April 2015, the Domestic Intelligence Service (BfV, Präsident Hans-Georg Maaßen) accused his conduct of publishing national secrets and thereby, on July 24, 2015, the Federal Public Prosecutor’s Office (GBA) notified the journalist and another journalist running the online blog, of the fact that it launched an investigation on them on national treason charges of having revealed confidential documents. In response, on July 30, 2015, the corresponding journalists publicized the justification for posting information and the injustice of the prosecution’s investigation through the online blog. The press and even the public criticized the prosecution for violating press freedom, saying that it was the first time since the ‘SPIEGEL affair’ in 1962 that an investigation was being pursued with the prosecution’s applying alleged national treason to journalists. Afterwards, on August 10, 2015, the Federal Public Prosecution announced a provisional termination of the investigation as per the decision of the Federal Ministry of Justice (BMJV) and so the government agency’s investigation into individual journalists has been closed.

See the below articles showing the course of this case that arose in July 2015.

<https://netzpolitik.org/2015/verdacht-des-landesverrats-generalbundesanwalt-ermittelt-doch-auch-gegen-uns-nicht-nur-unsere-quellen>
<https://www.spiegel.de/netzwelt/netzpolitik/netzpolitik-org-ermittlungen-wegen-landesverrat-a-1046077.html>

1-10. The local intelligence service had surveilled journalists over a long period of time without any legal grounds and collected personal information about them.

- The Local Intelligence Service (Verfassungsschutz) under the Interior Ministry of the Lower Saxony (Niedersachsen) state government had collected personal information by monitoring a right-wing extremist expert and freelance journalist (Andrea Röpke) for six years (2006-2012) without any valid reason. When she realized this fact and asked to be allowed to look at her own personal information collected, the agency refused her request and further tried to cover up the fact of surveillance by deleting data that it had collected. Moreover, the agency arbitrarily defined journalists working for a civilian radio (*Stadtradio Göttingen*) that sent out messages to extreme left groups, as ‘left-wingers and opponents of the constitution’ and had gathered and kept their personal information. In this way, the Local Intelligence Service had surveilled at least 7 journalists who covered or researched topics concerning extreme left/right, for several years without legitimate procedure and basis and besides, surveilled even a lawyer (Sven Adam) who defended the journalists fighting against their surveillance.

See the below articles. This case was disclosed on September 18, 2013.

<https://taz.de/Ueberwachung-von-Journalisten/!5058827>
<https://taz.de/Verfassungsschutz-Niedersachsen/!5058139>

1-11. The local intelligence service had exploited journalists as a tool for the purpose of gathering useful information.

- The Chief (Helmut Roewer) of the Thuringian Local Intelligence Service (Thüringer Landesamt für Verfassungsschutz (TLfV), which was an independent state authority from 1991 to the end of 2014) founded a disguised publishing company (Heron Verlagsgesellschaft) in Erfurt under the false name Stephan Seeberg on October 30, 1997. Taking advantage of the publishing company, the agency instructed TV reporters to bring image and audio materials related to right-wing organizations and then checked/verified the information it has already obtained with the materials brought by reporters. The disguised publisher was decided to disband on March 27, 2001, and was liquidated in 2003.

See the below articles. This case was revealed on November 17, 2011.

<https://www.sueddeutsche.de/politik/ex-verfassungsschutz-chef-roewer-und-die-neonazi-morde-sein-name-steht-fuer-das-chaos-1.1191435-2>
<https://meedia.de/2011/11/17/rechtsextremismus-dju-kritisiert-verfassungsschutz>

1-12. The state police interrupted unfavorable coverage and filming to the Federal Chancellor.

- In time for Federal Chancellor Angela Merkel visiting Dresden on August 16, 2018, the AfD (a right-wing party towards far-right) and PEGIDA (a xenophobic, racist, nationalistic group and anti-immigrant forces) together held an anti-Merkel demonstration. On the spot, a public broadcaster's current affairs program team (ZDF-Frontal 21) was covering and filming the circumstances. At that time, certain demonstrators threatened the ZDF team and asked the surrounding police to investigate the ZDF cameraman and then police officers stopped the ZDF team which was filming an open demonstration at a public place. Police officers practically detained the ZDF team for more than 45 minutes on the pretext of identification and inspection of press cards. In regard to this case, the Prime Minister of the Saxony state (Michael Kretschmer, CDU) left a post defending the police officers on his Twitter account: "the only people who behave seriously in the video are the police officers".

See the below article showing the course of this case that happened on August 16, 2018.

<https://www.spiegel.de/kultur/gesellschaft/zdf-team-hat-aerger-mit-pegida-anhaengern-von-polizei-festgesetzt-a-1223900.html>

2. Indirect way (1 case)

2-1. The ruling party caused economic disadvantage to a high-ranking executive of a public broadcaster who was unfriendly to the government, with exerting political influence. (Intervention in high-ranking personnel affairs)

- Within the board of directors (Verwaltungsrat) in public broadcaster ZDF, board members affiliated to the ruling party (CDU/CSU) early opposed extending the term of the Editor-in-Chief (Nikolaus Brender) who was unfriendly to the federal government, by taking advantage of their superiority in numbers (total 14, CDU/CSU 9 : 5 SPD). Eventually, on the pretext of low viewer ratings of the ZDF news programs, they frustrated the term extension for Editor-in-Chief Brender on November 27, 2009, despite the proposal from CEO Markus Schächter. Therefore, Nikolaus Brender left ZDF at the end of March 2010. With this case as a momentum, the composition of the supervisory boards within public broadcasters was reformed as per the Federal Constitutional Court's ruling on March 25, 2014.

See the below articles showing this case that arose on November 27, 2009.

<https://taz.de/!5151823>

<https://www.spiegel.de/kultur/gesellschaft/entscheidung-des-verwaltungsrats-zdf-chefredakteur-brender-muss-gehen-a-663847.html>

3. Proxy way (1 case)

3-1. The closest aide of the Federal Chancellor was elected as CEO of a public broadcaster on the basis of partisanship of the supervisory board in the public broadcaster.

- Ulrich Wilhelm, who was called a 'mouth' of Chancellor Merkel, applied for the CEO(Intendant) of public broadcaster BR in April 2010 without resigning his post as Chief of the Federal Press Office (BPA) and Federal Government Spokesperson (2005-07.2010). Although there were concerns/criticism about violating

independence and fairness of public broadcasting based on political influence because he was the closest aide to the powerful, the BR broadcasting board (Rundfunkrat) elected him as CEO with overwhelming support (40 out of 44 votes) on May 6, 2010. Only after being selected as BR's CEO, Ulrich Wilhelm announced that he would step down from his post in the federal government; in this regard, his conduct attracted much criticism. On March 19, 2015, members of the BR broadcasting board overwhelmingly consented to extend his five-year-term (33 out of 40 votes) once again, so his term became ten years in total (1.2.2011-31.1.2021). Furthermore, Ulrich Wilhelm had served as the Chairman of the ARD network for two years from January 2018, which is a joint organization of regional public broadcasters in Germany. See the below articles showing the course of this case that arose on May 6, 2010.

<https://www.handelsblatt.com/politik/deutschland/intendanten-posten-merkel-vertrauter-geraet-kluengel-debatte/3412022.html>

<https://www.faz.net/aktuell/politik/bayerischer-rundfunk-regierungssprecher-wird-intendant-1980523.html>

4. Interference in reporting (3 cases)

4-1. The incumbent Federal Chancellor steered the format and rule of a TV debate for the election in which she was a candidate, to her advantage.

- At the time of setting the Federal Chancellor candidate's TV debate which would be held three weeks previous to the general election on September 24, 2017, Chancellor Merkel has repeatedly rejected the debate format and rule proposed by public and private broadcasters (ARD, ZDF, RTL, Sat.1) that jointly organized the debate program. The broadcasters wanted to change the way of asking questions and increase the time to ask in order to create more space for spontaneity and depth. However, the Merkel side (Federal Government Spokesperson Steffen Seibert and Merkel's aide Eva Christiansen) did not agree to their proposal and further threatened them not to participate in the TV debate under changed conditions. It was known that Merkel even instructed broadcasters how the debate should proceed in her capacity as incumbent Chancellor, not candidate for the chancellery. In the end, the TV debate on September 3 took place in accordance with the format and rule in 2013 without any change, which Chancellor Merkel wanted. As the criticism poured out just after the TV debate, representatives of the ARD institutions held a meeting on September 18, 2017 and resolved to reform the TV debate format for the Federal Chancellor candidate until the next general election.

See the below articles showing this case that arose in July 2017, two months previous to the federal election for the 19th Bundestag.

<https://meedia.de/2017/07/05/machtmensch-mutti-wie-kanzlerin-merkel-den-medien-diktiert-wie-das-tv-duell-zu-laufen-hat>

<https://www.welt.de/politik/deutschland/article168864493/Wie-das-gelaufen-ist-so-koennen-wir-es-nicht-mehr-machen.html>

4-2. The Federal President exerted pressure on top-level executives of a private media so as to block an unfavorable report about himself.

- On December 12, 2011, Federal President Christian Wulff came to know the fact that private newspaper *Bild* was preparing to publish an article concerning his controversial private housing loan. He initially sought to issue a statement responding to the article but withdrew it shortly before the editorial deadline. Instead of that, he tried to contact *Bild*'s Editor-in-Chief (Kai Diekmann), who was on a business trip at the time. When this failed, he left a long message on the Editor-in-Chief's mobile phone mailbox, threatening with penal consequences in the event of publication. And then, Federal President Wulff proceeded to personally make a phone call to the CEO (Mathias Döpfner) of *Axel Springer SE*, Germany's largest media group that owns *Bild*, to request suspension of reporting. Nevertheless, *Bild* published the article about Wulff on December 13, 2011 after all.

See the below articles showing the course of this case that arose on December 12, 2011.

<https://www.faz.net/aktuell/politik/inland/affaere-wulff-im-schatten-der-wahrheit-11586639.html>

<https://www.bild.de/politik/inland/wulff-kredit-affaere/der-wulff-anruf-beim-bild-chefredakteur-21863344.bild.html>

4-3. The ruling party attempted to directly interfere in reporting of a public broadcaster.

- On Sunday, October 21, 2012, the Spokesperson (Hans Michael Strepp) for CSU, the ruling party's sister party, directly called the 'heute' editorial office of public broadcaster ZDF to force an editor not to broadcast news of the rival party's convention—the news was that on Sunday, the Bayern SPD elected Munich Mayor Christian Ude as its top-candidate for the state parliament election in September 2013. But the editor on duty (der diensthabende Redakteur) decided to broadcast the corresponding news as it was and thereby, the CSU

Spokesperson's attempt failed. When the CSU Spokesman's attempt to interfere in reporting was exposed by a private newspaper (Süddeutsche Zeitung) on October 24, 2012, the CSU Chairman (Horst Seehofer) denied the party Spokesperson's abuse of political power. However, amid the allegation that the attempt to interfere in reporting was based on instructions from the CSU's General Secretary (Alexander Dobrindt, Mitglied des ZDF-Fernsehrates), not the Spokesman's sole action, the CSU Spokesperson resigned on October 25, 2012. Afterwards, ZDF revealed that Strepp had contacted its editorial offices even more often via SMS on Sunday for the purpose of influencing in broadcasting the news about SPD's convention: to the Heads of ZDF-Landesstudios München and ZDF-Hauptredaktion Aktuelles. According to Bayerischer Rundfunk, Strepp asked another public broadcaster ARD-Hauptstadtstudio for plans to report on the news about SPD's convention. Moreover, Strepp sent an SMS on Sunday morning to the correspondents who were dispatched to ARD-Hauptstadtstudio by BR and asked whether ARD was planning a report on SPD's convention in Nuremberg, according to public radio B5 aktuell.

See the below articles showing the course of this case that arose on October 21, 2012.

<https://www.sueddeutsche.de/bayern/anruf-beim-zdf-csu-wollte-bericht-ueber-spd-parteitag-verhindern-1.1504207>

<https://www.spiegel.de/politik/deutschland/csu-sprecher-strepp-tritt-nach-zdf-affaere-zurueck-a-863356.html>

5. Self-censorship under government influence (3 cases)

5-1. A leading news agency released a favorable article to the federal government based on uncritical attitude without confirmation and verification of facts.

- On June 7, 2016, the Federal Criminal Investigation Office (BKA) first released statistics on crime trends in connection with immigration. In this regard, the Spokesperson for the Federal Ministry of the Interior, a higher organization of the BKA, said in a telephone interview with a journalist from Germany's leading news agency *dpa* that it helps us use as objective data in our discussion. In particular, the Spokesperson said something else, "Immigrants are not more criminal than Germans (Zuwanderer sind nicht krimineller als Deutsche)". Even though the Spokesperson's remark did not exist in the BKA statistical data and also was not verified, the *dpa* journalist quoted the Spokesperson as saying and selected headline and forwarded a relevant article. The following day, the article from *dpa* was reported through numerous media outlets as it was. That is, the favorable article to refugees, a major policy issue facing the federal government, has been poured out. In the midst of this, on June 9, 2016, problems were raised in the remark made by the Spokesperson and the *dpa* article that quoted it. In response, the Editor-in-Chief (Froben Homburger) of *dpa* said they had just "correctly expressed" the Spokesperson's remark. When asked by *dpa* on June 14, 2016, the Spokesperson retrospectively confirmed that "the *dpa* article was correct: *dpa* had correctly reproduced the quotation, sorted it in a balanced manner and did not take it out of context". On the other hand, other news agencies quoted the undoubtedly accurate statement: "a much larger percentage of immigrants did not commit any crimes (Der weitaus größte Anteil der Zuwanderer beging keine Straftaten)".

See the below articles showing this case that happened on June 7, 2016.

<https://www.spiegel.de/panorama/justiz/bundeskriminalamt-zuwanderer-begehen-weniger-straftaten-a-1096522.html>

<https://uebermedien.de/5616/vergleichsweise-kriminell-das-fluechtlingszitat-des-innenministeriums>

* Basis and reasons for viewing German event 5-1 as a self-censorship case:

According to Section 2 CARE and sub-description GUIDELINE 2.4 INTERVIEWS in the *Pressekodex* of the German Press Council (Deutscher Presserat, 2017, p. 3)⁷⁵, unconfirmed reports, rumours or assumptions must be quoted as they are, and a verbatim interview should be conveyed without paraphrasing its basic content arbitrarily. Also, due diligence is indispensable to the journalistic work, which must be carefully checked in respect of accuracy. The essence should not be distorted.

Although the *dpa* journalist reported a remark in the telephone interview with the spokesperson for the Federal Interior Ministry as it was, there was a discrepancy between the remark and the content of the official press release (statistical data); therefore, checking whether the remark was correct was needed because it was not verified. In the end, since the *dpa* journalist did not do so, the article which was favorable to the government and distorted its basic content (essence) was released.

It is hard to regard this event as simply a matter of lack of expertise in coverage. The reason is that *dpa* is a

⁷⁵ See Appendix 8 for the referred *Pressekodex*.

leading news agency in Germany and its expertise has been highly evaluated both internally and externally. Crucially, even though there were several subsequent opportunities to correct the content of the problematic article, the editor-in-chief of dpa defended the spokesperson's remark and at the same time rationalized their reporting (they claimed the legitimacy of their article).

In conclusion, based on the media's reporting behavior deviating from the *Pressekodex* and the attitude of journalists since the problem occurred, the researcher classified German event 5-1 as a case of 'self-censorship' by dpa journalists with a friendly attitude toward the government.

5-2. The Editor-in-Chief of a public broadcaster made a decision not to report a particular affair that could have a negative impact on a major policy of the federal government.

- On the night of October 16, 2016, there was a case (so-called 'Alster-Mord') in which a 16-year-old boy was killed by knife attack while sitting on the bank of Alster Lakes in Hamburg with his girlfriend. According to the surviving girl's statement, the murder suspect was likely to be an immigrant (refugee) in his early 20s. Soon after the case, this horrific crime made headlines through media companies across Germany. However, leading public broadcaster's main news programs (ARD-Tagesschau, ZDF-heute) did not report the case and further, no related articles were posted even on two broadcasters' internet website (tagesschau.de, heute.de). As viewers complained about and criticized such a reporting manner of public broadcasting, the deputy Editor-in-Chief of ZDF, Elmar Theveßen, defended his organization, explaining the reason for non-reporting as follows: "For us, it is not the decisive criterion which ethnic background a perpetrator has. Unless it is necessary to know for understanding the crime, it is important to know the facts. And if the facts are not yet available, if there are only rumors and signs that a perpetrator has a migrant background, it is far from sufficient to present them as a fact." Two weeks after the case, when there was the allegation that the IS had done this, ARD-Tagesschau reported merely corresponding content in a short article (28 seconds) on October 30, 2016. That's all.

See the below article showing this case that happened on October 16, 2016.

<https://jungefreiheit.de/kultur/medien/2016/zdf-verteidigt-nicht-berichterstattung-ueber-hamburger-mordfall>

5-3. The Editor-in-Chief of a public broadcaster made a decision not to report a particular affair that could have a negative impact on a major policy of the federal government.

- On December 3, 2016, the police of Baden-Württemberg state arrested a 17-year-old minor refugee from Afghanistan who had raped and killed a 19-year-old female college student near the footbridge (Ottiliensteg) in Freiburg (so-called 'Mordfall Maria L.'). and held a press conference. On the day, ZDF-heute like other media outlets reported on the arrest of the perpetrator, whereas another public broadcaster ARD-Tagesschau early decided not to report the case. As viewers complained about and criticized non-reporting, the Editor-in-Chief of ARD-aktuell, Kai Gniffke, defended his organization, stating on Tagesschau-Blog the reason for non-reporting as follows: "It is infinitely difficult for me now to explain what news criteria on which we had evaluated this case. Because it's a matter of human life. The editors at the Tagesschau are not insensitive. But we rarely report on individual criminal cases." The editorial office stated that the case had rather "local meaning" in a Facebook statement and they wanted to protect the suspect under age. In response, the German Journalists Association (DJV) as well as a number of media outlets did not agree with ARD's stance that this case had rather local meaning, and even a leading ruling party figure (Julia Klöckner, deputy chairman of the CDU federal party) criticized ARD, saying "Hiding the case doesn't help and it makes circumstances rather worse". One year later, December 27, 2017, there was a case (so-called 'Mordfall Mia V.'). in which a 15-year-old minor refugee from Afghanistan brutally killed a girl of the same age in Kandel, Rheinland-Pfalz state. At the time, ARD-Tagesschau unlike other public broadcasters (ZDF, SWR) was criticized by viewers due to its decision not to report the violent crime committed by a refugee once again.

See the below articles showing this case that happened on December 3, 2016.

<https://www.bild.de/politik/inland/ard-tagesschau/berichtet-nicht-ueber-ermordete-maria-49062536.bild.html>

https://www.focus.de/politik/videos/so-entschied-die-ard-in-der-vergangenheit-regionale-bedeutung-selbst-ueber-einen-mord-in-england-berichtete-die-tagesschau_id_6301794.html

* Basis and reasons for viewing German events 5-2 and 5-3 as self-censorship cases:

According to Section 8 PROTECTION OF THE PERSONALITY and sub-description GUIDELINE 8.1 CRIMINAL REPORTING in the *Pressekodex* of the German Press Council (Deutscher Presserat, 2017, pp.

6-7)⁷⁶, it is stipulated that the public has a legitimate interest in being informed about crimes, investigation proceedings and trials and so, it is the task of the press to report on these issues; however, the report of revealing someone's identity through sensational interests alone is not justified. Also, if the legitimate interest of the public outweighs the interests worthy of protection of the persons involved in the individual case, the press is allowed to disclose names, photos and other information that enable the identification of suspects or perpetrators.

Murder cases not reported by ARD and ZDF, aside from the type and brutality of the crime, were reported with such weight that many media outlets covered them in headlines. Considering the fact that many people have posted postings making their inquiries and expressing dissatisfaction at the ARD and ZDF social media accounts in regards to their non-reporting decisions, the public also showed legitimate interests in the murder cases. However, the editors-in-chief of ARD and ZDF decided not to report the cases itself at all, instead of screening and reporting the identity information of suspects.

The non-reporting of such cases by ARD and ZDF might be understood in terms of the protection of minors (GUIDELINE 8.3 CHILDREN AND YOUNG PEOPLE) or the prohibition on discrimination (Section 12 DISCRIMINATION) but nevertheless, it can bring up a problem of the change in reporting standards depending on the timing—i.e. lack of coherence—in that they reported on similar events in the past (Deutscher Presserat, 2017, pp. 7, 9).

Most of all, given that the public broadcasters ignored the legitimate interest of the public and made a non-reporting decision, not a delivery of information on events within the limited range, the researcher judged German events 5-2 and 5-3 as cases of 'self-censorship' by public broadcasters.

⁷⁶ See Appendix 8 for the referred *Pressekodex*.

3.4.2 In-depth Interview

a. Creating Questions and Deciding on Interviewee Groups

Based on the provisional case study report that enabled to identify the tendencies (patterns) of government influence on the press, basic common questions were drawn up. In this process, interviewee groups suitable to answer these questions and selection criteria for interviewees were established. The interviewees were divided into those who could serve as an indication of the position of the government and those who could represent the press as an object of government influence.

b. Seeking out Interviewees and Completing Tailored Questionnaires

Interviews with government officials are important and essential to grasp the fundamental reason or purpose of government influence on the press. However, it was not practically easy to seek out high-ranking officials who would be suitable to ask about its intention. Consequently, a total of two officials—one each from South Korea and Germany—were sought out.

Since interviews with journalists reveal the journalists' own testimonies as well as provide insights into when, how and in what way their government exerted something on the press, the researcher strived to seek out as many journalists suitable to interview as possible and sought out a total of 14 journalists—seven each from South Korea and Germany. One of the key criteria at the moment of selecting interviewees was a governance structure of media to which the journalist belongs or belonged because it was identified through the case study that the governance structure (public/private) of media led to a difference in government influence on the press. Thus, to grasp the cause behind that, the researcher selected a mix of journalists from both public and private media. Furthermore, to ensure their understanding of this study topic and increase the credibility of their answers, the researcher sought out interviewees with priority given to senior journalists who have ever directly/indirectly experienced their government's influence in the past or have a considerable career in the field of journalism.

After finishing seeking out the interviewees, the researcher created further tailored questions in accordance with their respective characteristics of affiliation, rank, career, etc. and included them in the previously created basic common questions. Thereby, 16 individual questionnaires were completed. As they were for an in-depth interview, the questions were designed to be semi- or loosely structured in order to lead to detailed open answers, not short answers. In principle, a face-to-face interview is conducted for the in-depth interview but it was inevitable to conduct a written interview via e-mail if an interviewee requested it. In the case of the written interview, there are limitations such as the fact that an interviewee may omit answers or that the interviewer is unable to immediately ask further questions. Therefore, as a measure to overcome these limitations, the researcher added conditional questions so as to lead answers to be as specific as possible and not to miss any answers⁷⁷.

c. Conducting Interviews

Interviews were conducted after sending individual questionnaires to interviewees via e-mail in advance so that they had time to understand the questions. 12 of the total 16 interviewees (75%) met with the researcher for a face-to-face interview in Korean or English, while the remaining 4 (25%) had written interviews in English or German via e-mail by their request. The face-to-face interviews that carried out for 12 interviewees were recorded with the interviewees' consent and then were transcribed by the researcher.

The basic information of interviews, which were carried out with a total of 16 interviewees, 8 each in South Korea and Germany throughout a period of 7 months (Apr. 2018 – Oct. 2018), is as below. The researcher promised anonymity to the interviewees in order to hear frank and critical opinions about the media environment in their own countries. So, all interviewees were anonymized⁷⁸. Instead, to show the interviewees' suitability for this study, basic information on their affiliation, rank, career, etc. were presented.

⁷⁷ See Appendix 9 for in-depth interview questions.

⁷⁸ The researcher submitted a real-name list of the interviewees to only two supervisors to prove the in-depth interview's

d. Analysis of Interview Content

Through content analysis on the transcripts of face-to-face interviews and the answers to written interviews, the researcher tried to grasp what perceptions South Korean and German journalists had of their government's influence and what the reasons/backgrounds for their perceptions were. Any further questions that arose during the interview content analysis were resolved through follow-up interviews.

Superficial facts such as the substance and tendencies (patterns) of the governments' influence on the press in South Korea and Germany were identified through the case study and then the in-depth interview was conducted to ask journalists practically working in press circles about the perception of their government's influence, that is, their media environment. In other words, the in-depth interview was carried out to identify in more detail what was not captured in the case study and to identify in more detail what was not captured in the case study and to understand the case study results deeply.

No.	South Korean interviewees' list	Interview method and date/place
1	A former high-ranking government official who was appointed to the post involved in government influence over the press ○○○ / former presidential secretary for media (12.2011–02.2013)	Face-to-face 15.06.2018 14:00-15:30 Interviewee's office in Seoul
2	A journalist who is well aware of the close relationship between the government and private media ○○○ / former private newspaper CEO and former private TV CEO (01.2012–02.2014)	Face-to-face 20.06.2018 13:30-15:25 Outside meeting-room in Seoul
3	A journalist who had directly experienced pressure from the government ○○○ / former public TV CEO (04.2003–08.2008, fired by the conservative regime)	Face-to-face 19.06.2018 10:30-12:40 Interviewee's office in Daejeon
4	A journalist who had directly experienced and exposed government influence ○○○ / former chief of the news bureau in public TV (12.2012–05.2014, since then working as an executive)	Face-to-face 18.06.2018 15:00-17:30 Interviewee's office in Suwon
5	A journalist who had directly experienced pressure from the government ○○○ / Senior reporter with 21-year career and labor union leader in public TV (1997–current / 02.2017–current)	Face-to-face 28.06.2018 09:30-10:35 Outside meeting-room in Seoul
6	A journalist who studied the effects of government influence on the psychology of media workers ○○○ / Reporter with 15-year career in public TV (2003–current)	Face-to-face 27.06.2018 20:30-22:50 Outside meeting-room in Seoul

substance and received confirmation from the two.

7	A journalist who has covered affairs concerning government influence over the press ○○○ / Editor-at-large with 35-year career in private radio and affiliated professor (1983–2019 / current)	Face-to-face 29.06.2018 10:00-13:00 Interviewee's office in Seoul
8	A journalist who has presented measures to enable to block political pressure/control to media ○○○ / Senior reporter with 22-year career and labor union leader in private TV (1996–current / 03.2016–current)	Face-to-face 27.06.2018 09:50-11:50 Interviewee's office in Seoul

No.	German interviewees' list	Interview method and date/place
1	A high-ranking government official who has been appointed to the post that can be involved in government influence over the press ○○○ / Official affiliated with the Federal Press Office (06.2016–current)	Written answer via email 05.06.2018
2	A former editor-in-chief who is familiar with the internal affairs of German public TVs ○○○ / Editor-in-chief for 20 years in public TV (11.1991–11.2011)	Face-to-face 20.04.2018 16:00-17:10 Interviewee's office in Leipzig Written answer via email 04.05.2018
3	A journalist who can account for recent internal affairs of German public TVs ○○○ / Reporter and editor with 10-year career (fest-frei) in public TV (2008–current)	Written answer via email 26.04.2018 Face-to-face 27.04.2018 14:50-16:40 Outside meeting-room in Leipzig
4	A journalist who can speak for reporters working for German public broadcasting (esp. freelance journalists) ○○○ / Reporter with 18-year career (fest-frei) in public radio and Head of the local journalists association (2000–current / 05.2012–current)	Face-to-face 07.08.2018 11:00-15:48 Outside meeting-room in Leipzig Written answer via email 28.09.2018 30.09.2018 Face-to-face 08.10.2018 09:00-11:25

		Outside meeting-room in Leipzig
5	A journalist and scholar who showed the reporting tendency of the German press through analysis of reports in major media ○○○ / Reporter and editor for 22 years in private news magazine and media scholar (1968–1990 / current)	Written answer via email 14.08.2018
6	A journalist who can account for characteristics of reporting in German private media ○○○ / Foreign correspondent with 27-year career in private news magazine (1991–current)	Written answer via email 07.07.2018
7	A journalist who has been researching media governance (esp. media conglomerates) ○○○ / Head of the department more than 22 years in independent TV-Guide magazine and media critic (1992–2014 / current)	Written answer via email 01.05.2018
8	A journalist who had directly and indirectly experienced and exposed pressure from the government ○○○ / TV and radio reporter (fest-frei) for 24 years at public TV and critic using me-media (1992–04.2016 / current)	Face-to-face 13.04.2018 13:30-17:30 Interviewee's house in Aachen Written answer via email 22.10.2018

Chapter 4. Study Results I: Case Study

In this study, the case study aimed to identify what and how governments exerted on the press, how the media environment responded to that, through analysis of cases in which the independence, autonomy or critical ability of the press were undermined by governments.

In the above-mentioned ‘Chapter 2. Literature Review and Theoretical Study’, things governments exert on the press were sorted into control, regulation, and influence, and concurrently the ambiguity of demarcation among them was described.

Here, the goal is not to define ‘what governments exerted on the press’, but to identify the substance and tendencies (patterns) of government influence on the press from a macro perspective. Therefore, it states that the term ‘influence’, which could comprehensively encompass ‘what governments exerted on the press’, was used.

4.1 Government Influence’s Tendencies on the Press

4.1.1 Main Type (Way)

First of all, the researcher identified in what ways the governments influenced the press. This corresponds to the first among the criteria (analysis categories) applied in categorizing the cases.

As seen in <Figure 16>, South Korea and Germany display a significant distinction. Germany has an overwhelming number of ‘direct way’ cases with 12 cases. On the other hand, South Korea has a relatively high number of ‘proxy way,’ ‘interference in reporting,’ and ‘self-censorship under government influence’ cases.

To be specific, many of the direct way cases seen in Germany consist of restriction on covering (4 cases) and surveillance on journalists (4 cases)—refer to <Figure 22>. Such method is known to have been practiced mainly before the unification of Germany (Deutsche Wiedervereinigung). However, the current ‘direct way’ has practiced in a not explicit, subtle way, for a purpose different from that of the past which used to be for system maintenance.

What is distinctive about South Korea is that while it has a few ‘direct way’ cases, it has a relatively higher number of ‘proxy way’ cases than Germany. South Korea’s proxy way cases were implemented in a way that the President’s closest associates were appointed as the heads of media regulatory bodies or public broadcasters and acted on behalf of the government. Such reality indicates that there exists a system, or a governance structure⁷⁹, that allows the government (President) to appoint its representatives who can exercise influence to the press on its behalf.

What South Korea and Germany have in common is that ‘indirect way’ cases are rarely seen. The number of ‘indirect way’ cases collected in both countries by the researcher is only one in Germany. Through that, it can be inferred that it is rare for the government to exert indirect or roundabout pressure to media companies or journalists by providing or suspending social and economic benefits. To be more precise, it may be said that such cases are at least rarely exposed outside.

⁷⁹ The governance structure mentioned here was described in detail through in-depth interviews with South Korean journalists. See Part 5.2.1.1.1 Public Broadcasters' Governance.

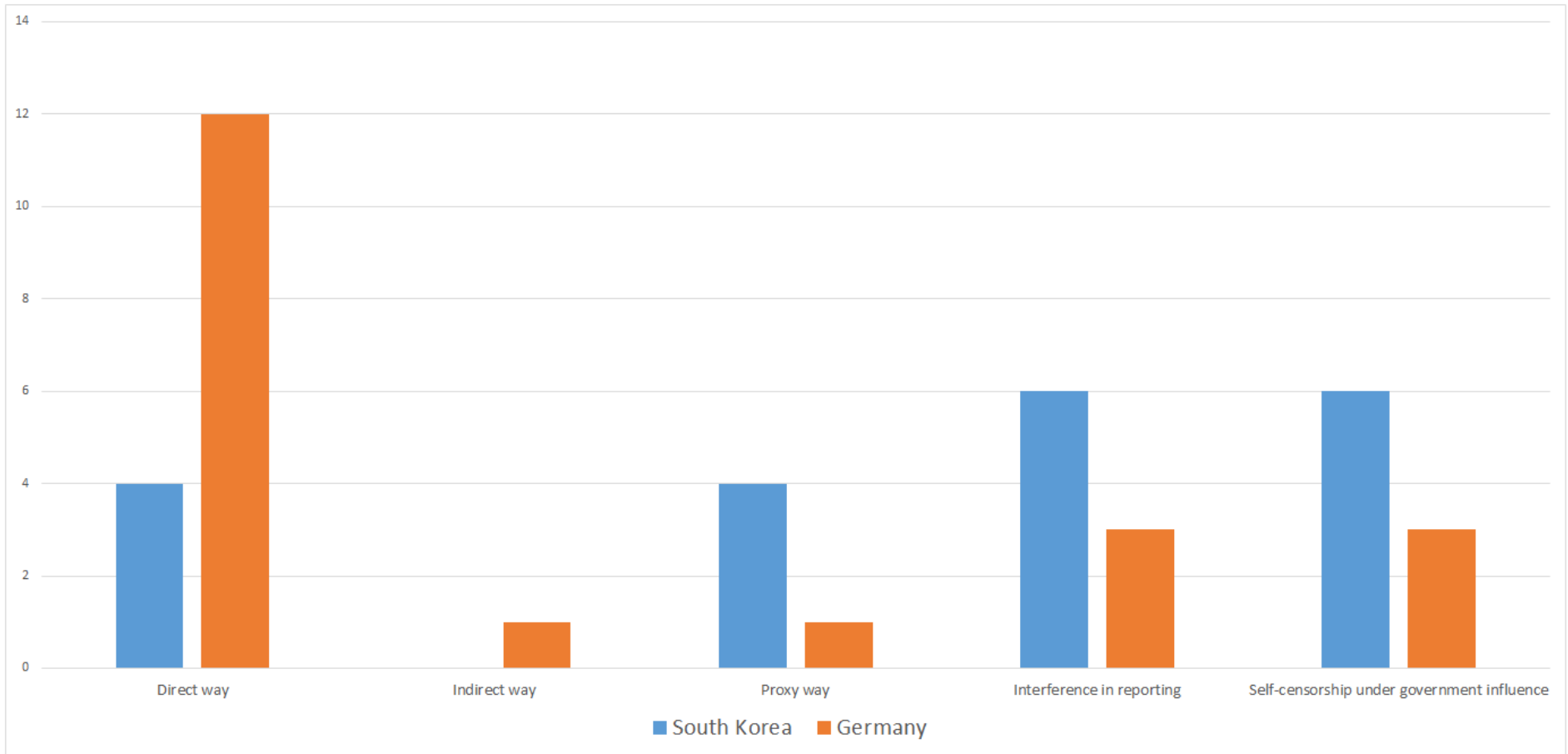


Figure 16 Types (ways) of government influence

		South Korean cases
Type (way)	Case No.	In detail
Direct way	1-1	lawsuits for libel and tax investigation into affiliates on the grounds of the report on a scandal involving the President
	1-2	lawsuits for defamation and dissemination of false information on the grounds of criticism of the government's major policy
	1-3	surveillance of actions inside media, involvement in appointments of media executives
	1-4	surveillance of actions inside media, issuance of directives to make public broadcasting pro-government
Proxy way	3-1	appointment of the President's closest associate as the chairman of the commission getting involved in sanctioning broadcasting
	3-2	appointment of the President's closest associate who helped the winning of a presidential election as the head of a semi-public broadcaster
	3-3	appointment of the President's closest associate who helped the winning of a presidential election as the head of a public broadcaster
	3-4	appointment of a journalist on intimate terms with the President as the head of a public broadcaster
Interference in news reporting	4-1	demand for change in the reporting direction unfavorable to the government
	4-2	demand for expansion of favorable news to the regime and reduction/deletion of unfavorable news
	4-3	call for non-reporting of personal corruption-related article by a presidential spokesperson
	4-4	demand for revisions to the news content that satirized the government by a presidential spokesperson
	4-5	call for regime-biased reporting from broadcasters by a national intelligence agency
	4-6	request for publishing a specific article to regime-friendly media
Self-censorship under government influence	5-1	order to hold off on broadcasting critical content toward the government by the head of a public broadcaster
	5-2	decision to abolish their current affairs programs that have criticized the government by the heads of public broadcasters
	5-3	order to stop broadcasting news on corruption of a national intelligence agency by the chief general manager of the news editing department
	5-4	order to revise an article on the regime corruption and finally not to report the article by the general manager of a department
	5-5	decision on the regularization of 'Presidential Speech Broadcast' by top-level executives in a public broadcaster, despite strong opposition of staff members
	5-6	issuance of self-reporting guidelines to prevent subordinate journalists from producing articles unfavorable to the government by a chief of the news bureau

German cases		
Type (way)	Case No.	In detail
Direct way	1-1	restriction on coverage and reporting unfavorable to the Federal Chancellor in advance
	1-2	attempt to steer a reporting-direction regarding a sensitive issue (in short, attempt to create ‘press guidelines’)
	1-3	restriction on coverage by specific domestic and foreign journalists
	1-4	existence of government-biased unofficial news guidelines(unsspoken rules) on specific topics within a public broadcaster
	1-5	sudden shutdown of a left-wing internet website
	1-6	surveillance and collection of information on foreign major media by a national intelligence agency
	1-7	withdrawal of the permission for coverage due to concerns about unfavorable reporting on a specific issue
	1-8	attempt to surveil journalists, who wrote critical articles, through a military intelligence agency by high-ranking officials of the Federal Ministry of Defence (attributed to the proposal of a private large corporation supplying arms)
	1-9	investigation of online bloggers, who disclosed unfavorable information about the federal government, on treason charges
	1-10	surveillance and collection of information on specific journalists by a local intelligence agency
	1-11	exploitation of journalists as a tool gathering information by a local intelligence agency
	1-12	interruption to coverage and filming unfavorable to the Federal Chancellor by the state police
Indirect way	2-1	frustration of the term extension for the editor-in-chief by the board of directors in a public broadcaster that the ruling party’s forces influence (in a word, economic disadvantage to a figure who is not friendly to the regime)
Proxy way	3-1	elect the incumbent chief of the Federal Press Office (BPA) as the head of a public broadcaster by the broadcasting council
Interference in news reporting	4-1	intervention in formats and rules for the Federal Chancellor candidate TV debate by the Federal Chancellor’s Office
	4-2	attempt to call for non-publishing of an unfavorable article about himself by the Federal President
	4-3	demand for excluding certain news to a public broadcaster by a spokesperson for the ruling party’s sister party
Self-censorship under government influence	5-1	publish a favorable article to the federal government without confirmation of facts by a news agency
	5-2	decision not to report a particular affair that could have an impact on a major policy of the federal government by public broadcasters
	5-3	decision not to report particular affairs that could have an impact on a major policy of the federal government by the editor-in-chief of a public broadcaster

4.1.2 Macroscopic Intention and its Attainment or not

This part's analysis content was based on a datasheet that was integrated for understanding the context of individual cases and conducting the efficient analysis. The datasheet is placed at the end of this chapter due to its large volume. See pages 123-157.

The results of understanding the nature of government influence on the press, namely the macroscopic intention (reason or purpose), are shown in <Figure 17>. The government influence was mainly exerted on the press through 'pre-emptive/planned measures' both in South Korea and Germany.

In Germany, 18 out of 20 cases correspond to 'pre-emptive/planned measure'. This represents that the German government preemptively exerted influence on the press before unfavorable articles were published as part of its crisis management. Considering that the measures were 'pre-emptive', there is a possibility that the government influence has had a long-term effect on reports related to specific issues.

The following cases are the prime examples. After the federal government's (Chancellor Merkel's) sudden decision to accept refugees at the end of August 2015, a reporter disclosed that non-documented press guidelines to avoid negative or critical news related to these issues have been issued to his public broadcaster (case 1-4). Since 1999, the Federal Intelligence Service (BND) has been conducting surveillance on and collecting information from major media outlets around the world, including BBC, The New York Times and Reuters (case 1-6). The local agency for internal security (Verfassungsschutz Niedersachsen) had surveilled journalists covering left-wing or right-wing groups and collected their personal information for 10 years since 2003 (case 1-10).

Furthermore, it is notable that the two cases corresponding to 'follow-up/reactive measure' are included in 6 cases in which the government failed to achieve its goal despite its exerting influence—refer to <Figure 18>.

In South Korea, there are 15 cases that correspond to 'pre-emptive/planned measure' and 5 cases to 'follow-up/reactive measure'. When it comes to the timing of government influence, like Germany, there are far more cases in which the government exercised influence with pre-emptive/planned measures before certain reports were being published rather than follow-up/reactive measures. However, in South Korea, most of the cases—which were virtually follow-up/reactive measures—involved the government spontaneously exercising influence just after unfavorable reports were expected to be published. Hence, technically, the South Korean government's 'pre-emptive/planned measures' are different in nature from those of the German government.

The following cases are the prime examples. The Presidential senior secretary for public information frequently called the CEO of a public broadcaster and interfered in reporting, demanding they would emphasize favorable news to the President and the government, and minimize the negative ones on the day's news (case 4-2). When the Presidential spokesperson found out that a private newspaper was covering his personal corruption-related news, he called the editor-in-chief of the newspaper and called for non-reporting (case 4-3). When a negative article on the National Intelligence Service was published in an influential newspaper, NIS's agent handed cash to the chief of the news bureau in a public broadcaster and requested for non-reporting of such reports on the main news magazine on that day (case 4-5). Thus, it can be said that although the South Korean government influence on the press were preemptive measures on the surface, a considerable number of them were exerted spontaneously.

Moreover, the South Korean government succeeded in achieving its goal (including partial success) by exerting its influence on the press in 18 out of 20 cases, which accounts for 90 percent—refer to <Figure 18>. Through this, it can be evaluated that the media environment in South Korea was vulnerable when it comes to responding (resisting) to government influence.

In conclusion, it is common for both the German and South Korean governments to preemptively exercise influence to the press, but their influences are different in nature. The German government influence on the press was proactive, and thus it was premeditated and had a long-term effect, whereas the South Korean government influence was spontaneous and short-sighted as it was exercised to deal with imminent situations. Also, there were relatively more cases in South Korea where the government's influence (intention) was reflected in or accepted by the press than in Germany, and this needs to be understood in terms of the media environment.

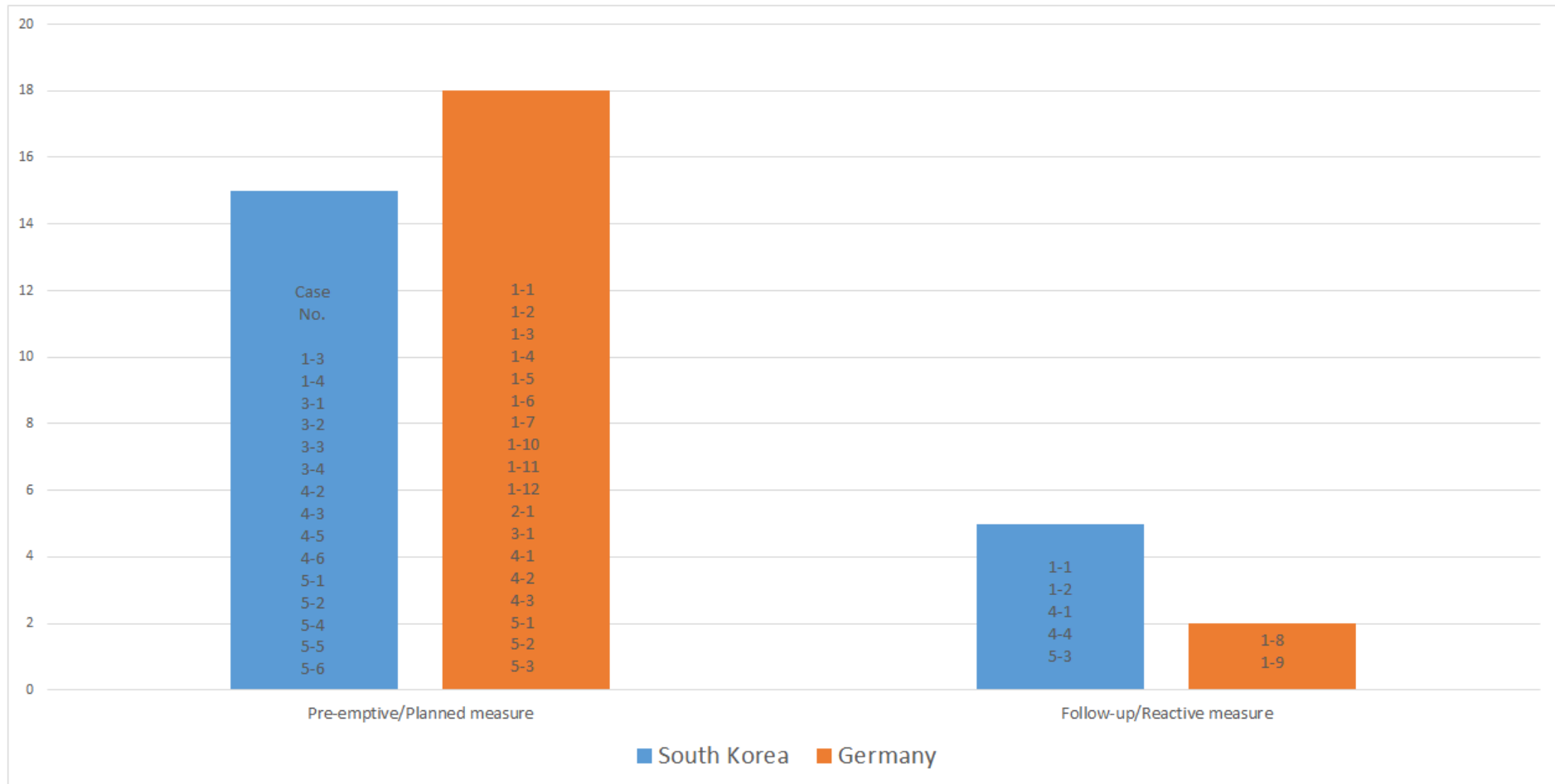


Figure 17 Macroscopic intention (reason or purpose) of government influence

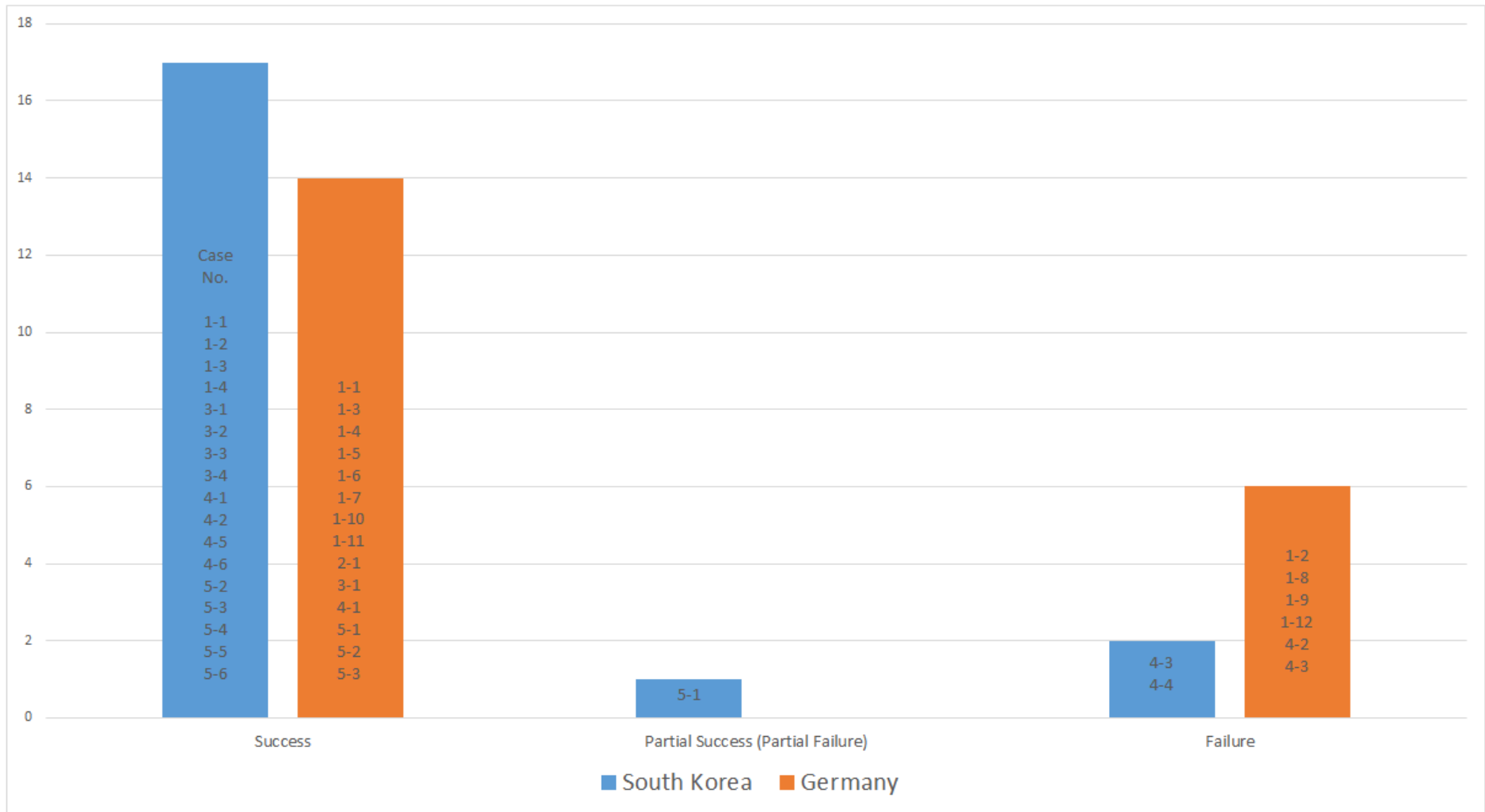


Figure 18 Attainment of an aim or not through government influence

4.1.3 Timings of Government Influence

This part's analysis content was based on a datasheet that was integrated for understanding the context of individual cases and conducting the efficient analysis. The datasheet is placed at the end of this chapter due to its large volume. See pages 123-157.

In order to take a look at all the timings of government influence on the press at once, the situations of each country were separated and tabulated, and the analysis content is also shown separately as below.

1) South Korea

<Figure 19> illustrates that the timings or periods of the South Korean government's influence on the press were limited to the term of the President at that time—in other words, they ended with the presidential election. In addition, the South Korean government's influence stood out between the first and third years of the five-year presidential term.

In particular, most of the execution of influence through 'direct way', 'proxy way', and 'interference in reporting' appeared in the first and second years of the presidential term, which is considered the early stage of the regime. On that basis, it can be said that the South Korean government (the President), under the political system of 'single five-year presidential term system', exerted its influence on the press at the early stage of the regime. The fact that most of the 'self-censorship'—5 out of 6 cases—were carried out in the early stage of the regime supports this interpretation.

Additionally, case 4-2 displays that the new power can have an influence on the press right after its birth. President-elect Park Geun-hye's transition team began performing its duties in early January 2013, about two months before the official inauguration of the new government, and had since intervened in the reporting of public broadcasters. Hence, it may be noted that the South Korean government's influence was exercised based on the presence (acquisition) of substantive power, rather than the organizational composition.

Cases 1-3 and 1-4 of <Figure 19> show that the government's influence had been consistently exerted on the press from the beginning to the end of the regime, which makes us suspect the presence of an agency acting as the 'control tower' and other bodies carrying out its instructions. During the Lee Myung-bak government, the Prime Minister's Office and the National Intelligence Service surveilled internal moves in public broadcasters and a semi-public broadcaster from November 2008 to December 2009 and from February 2010 to January 2012, respectively, under the instruction of the Presidential Executive Office (Blue House). Based on this, the Lee Myung-bak government (specifically, the Blue House) got involved in the appointment of executive members of public broadcasters and issued guidelines to reshape the public broadcasters into pro-government media throughout the term.

Cases 4-6, 5-3, 5-4, and 5-6 demonstrate that the government's influence was concentrated at a certain period of time, and this reveals what issue the government did not want to be reported was. From June to September 2013, the Park Geun-hye government manipulated the media using a private newspaper that was favorable to the regime to prevent the spread of the 'corruption in which the National Intelligence Service had intervened in the presidential election through manipulation of public opinion' related to the birth of the regime. Meanwhile, the executives of public broadcasters refrained from reporting the corruption of the National Intelligence Service through self-censorship under government influence.

2) Germany

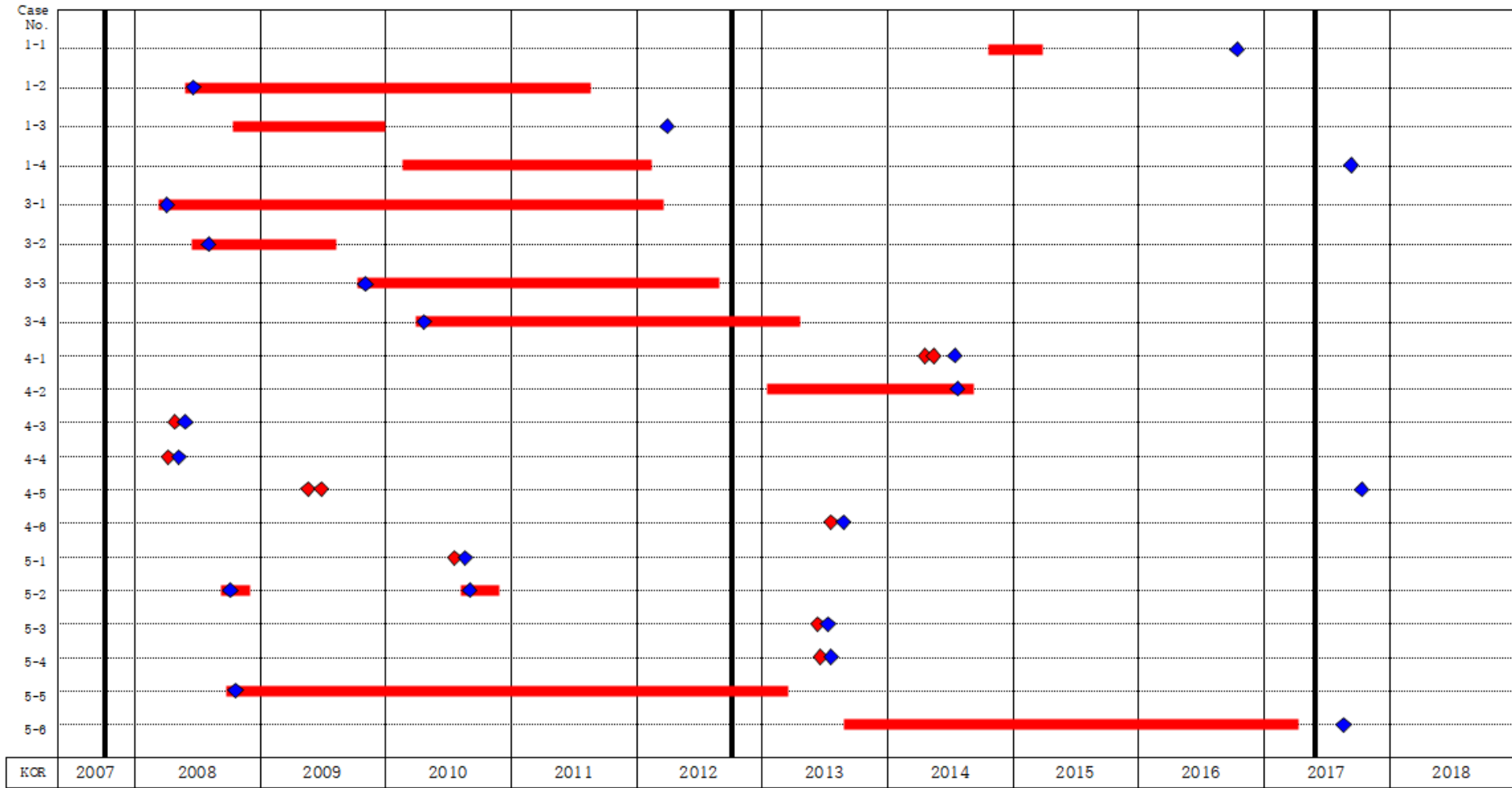
As illustrated in <Figure 20>, a characteristic of the German government that contrasts with that of the South Korean government is that some of the German government's influence on the press lasted for a considerable period of time including the general election period, a turning point in change of regime. It was previously speculated that the German government's influence could have a long-term effect on the press, given that 18 out of 20 German cases fall under 'pre-emptive/planned measure'—refer to <Figure 17>. Moreover, the German

government's influence, unlike that of South Korea, uniformly appeared throughout the regime and it is difficult to find the relation between the timing and type (way) of government influence.

Case 1-6 illustrates what could be the foundation (background) for the long-lasting government influence on the press. The Federal Intelligence Service (BND), the foreign intelligence agency of Germany, has directly or indirectly cooperated with the large-scale wiretapping of the US's National Security Agency in the past and wiretapped senior officials of the member states of the European Union. As issues have been raised about the absence of clear legal bases for such intelligence activities (spying)—that is, illegal acts—the Bundestag passed the BND reform bill on October 21, 2016. This enabled the Federal Intelligence Service (BND) to collect information using the foreign telecommunications network if necessary, and further to surveil and collect information on foreign media and journalists.

With the implementation of the BND Act (BND-Gesetz) in January 2017, the BND's intelligence activities against foreign media are being legally justified—despite the domestic and international criticisms that it is “a violation of freedom of the foreign press and breach of the constitution”—and the Act is still in force. On this account, *SPIEGEL*'s exclusive article dated February 24, 2017, which stated the BND has been conducting surveillance on foreign major media and collecting their information since 1999, could not mean anything more than a revelation.

Cases 1-2, 1-4, 5-1, 5-2, and 5-3 demonstrate that the government's influence was concentrated at a certain period of time, and through this, it can be guessed what issue the government had cared about in terms of news management. On August 24, 2015, Federal Chancellor Angela Merkel announced a plan to accept Syrian refugees despite the internal oppositions, including one from the coalition partner CSU. The second half of 2015 and 2016 in <Figure 20> indicate that the government's influence has been exerted on the reporting of refugee-related issues and that self-censorship has been practiced as well.



- ◆ — Timing or period of government influence
- ◆ Timing of visible response (resistance) to government influence by the media environment
- | South Korean presidential elections (Every 5 years, but the president was impeached in 2017 and therefore an early election was held.)

Figure 19 Timings of South Korean government influence and visible response by the media environment

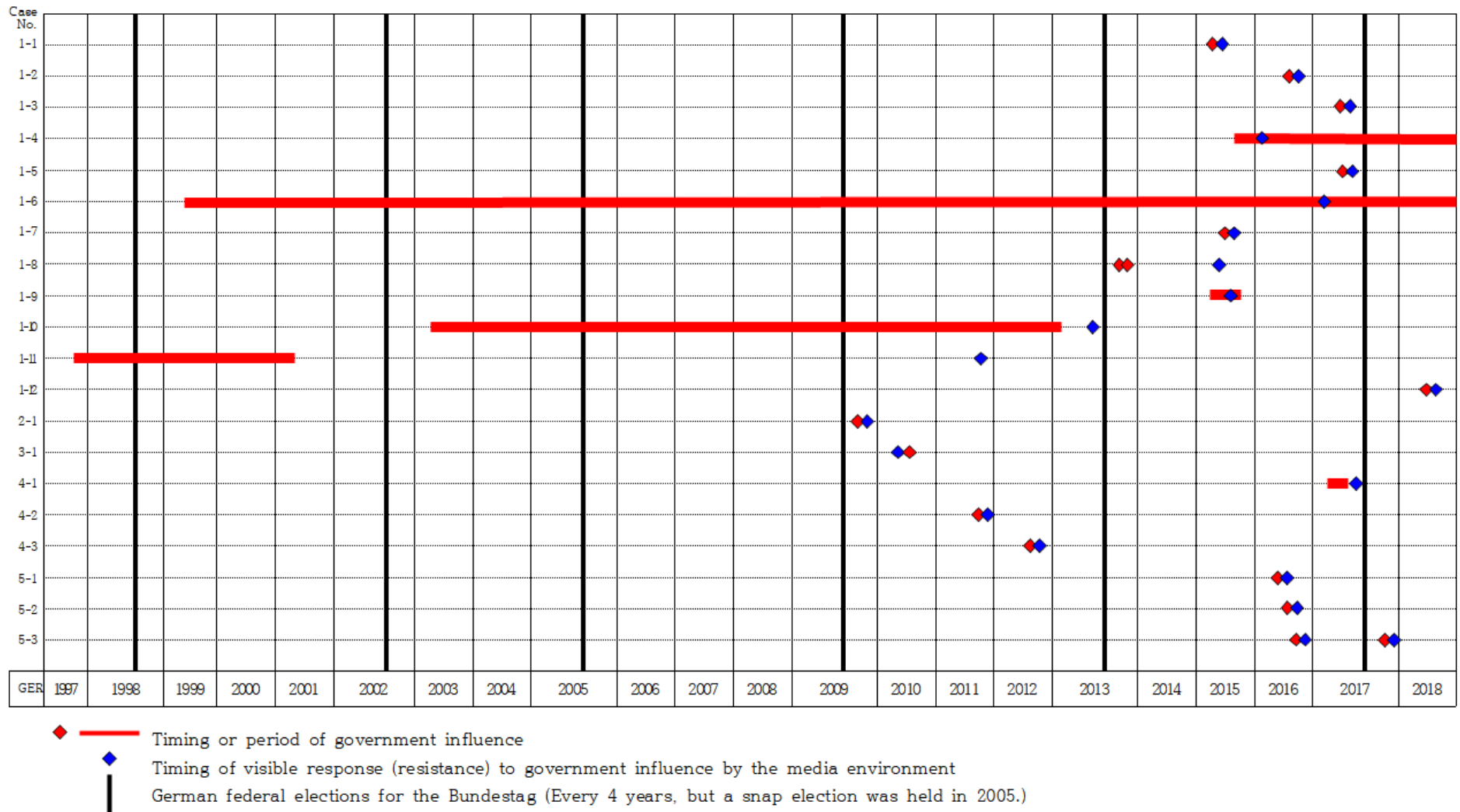


Figure 20 Timings of German government influence and visible response by the media environment

4.1.4 Execution Results of Government Influence

This part's analysis content was based on a datasheet that was integrated for understanding the context of individual cases and conducting the efficient analysis. The datasheet is placed at the end of this chapter due to its large volume. See pages 123-157.

In order to take a look at all the measures executed by the governments to influence the press as well as the consequences at once, the situations of each country were separated and tabulated, and the analysis content is also shown separately as below.

1) South Korea

<Figure 21> shows that there are more execution results done by the executives inside media companies than those done by government bodies. That is to say, there were many cases in which the CEOs and executives of media companies that were influenced by the South Korean government took disciplinary actions against journalists who protested pro-government reporting or sought critical reports of the government, and arbitrarily decided the production and reporting of articles or journalism contents for the purpose of government-biased reporting. This shows that the executives of the media companies aligned with the regime through abuse of authority, and also suggests the extent of the collusive ties between the government and the press.

It is also noticeable that the outside (government bodies) and the inside (the executives) of the media companies had an influence at the same time, resulting in more than three and up to six execution results at once in a single case. Such influences exerted from the inside and outside of the media companies simultaneously, which appear to be 'ruthless bombing', would increase the effectiveness of the government's influence and seriously undermine the independence and critical ability of the press.

As seen in cases 3-2, 3-3, and 3-4, the most recognizable feature is that the 'proxy way', which the government exerted its influence on the press through its proxies, led to large and intense results:

- Case 3-2: 33 employees, including 6 laid off, were given disciplinary actions;
- Case 3-3: 31 employees were suspended or had their pay reduced;
- Case 3-4: 6 employees were laid off, 38 were suspended, and 69 were demoted.

These were the results of the South Korean government's (President's) direct or indirect involvement in the appointment of the CEOs of public and semi-public broadcasters based on the governance structure and the abuse of authority over personal affairs by the appointed CEOs and the executives following them to give disadvantages to the staff members who resisted pro-government reporting. Thus, it may be noted that there were measures of vindictive nature (that enforce obedience) in South Korea against journalists who opposed pro-government reporting.

Cases 5-5 and 5-6 show that journalists' self-censorship lasted for a long period of time and was not a one-time incident; and this gives an idea of the intensity of the South Korean government's influence on the press or the extent of the collusive ties between the government and the press during the period:

- Case 5-5: The CEO and the executives of a public broadcaster enforced the biweekly broadcasting of 'Presidential Radio Speech' for 4 years and 5 months, despite staff members' numerous calls for the abolition of the speech program on grounds of 'political bias';
- Case 5-6: A high-level executive of a public broadcaster (the chief of the news bureau, who transitioned to the executive director of the news division and then served as the CEO of the broadcaster) had issued in-house guidelines to prevent unfavorable reports to the government from being published and forced regime-biased news reporting while being in office for five years.

2) Germany

<Figure 22> reveals that there are a relatively higher number of execution results done by government bodies in Germany compared to South Korea. This is because there were many 'direct way' cases (12 cases) in which the

German government mobilized relevant bodies to exercise influence. Specifically, the execution results done by government bodies are restrictions on covering (4 cases), surveillance on journalists (4 cases), instructions for reporting direction (3 cases), and prosecution investigation (1 case).

In addition, all of the large and intense execution results were caused by government bodies:

- Case 1-3: The sudden revocation of accreditation for coverage of 32 specific journalists from home and abroad by the Federal Press Office (BPA);
- Case 1-6: The surveillance and information gathering on foreign major media by the Federal Intelligence Service (BND) for more than 20 years;
- Case 1-9: The investigation against journalists (bloggers) on charges of treason by the Federal Public Prosecutor's Office (GBA) for the first time since 1962;
- Case 1-10: The surveillance and information gathering on journalists covering or studying issues related to extreme left-wing/right-wing by a state's intelligence agency (Verfassungsschutz als eine Abteilung des Niedersächsischen Ministeriums für Inneres und Sport) for 10 years.

There are only two cases (cases 1-1 and 1-4) in which the outside (government bodies) and the inside (the executives) of the media companies had an influence at the same time, resulting in two kinds of execution results in a single case. And there are 2 or fewer execution results that were produced in each case. These features are well contrasted with those of South Korea in terms of execution results, and it is anticipated that the undermining of the independence and critical ability of the German press would be less serious than that of South Korea because influences were not exerted simultaneously from the inside and outside of the media companies.

Moreover, no cases in which the executives of media companies took disciplinary actions, such as suspension, salary reduction or demotion, against their journalists were identified. However, case 1-4 demonstrates that if a journalist does not follow the instructions to fulfil pro-government reporting, disciplinary actions of vindictive nature (that enforce obedience) may be taken. A steadily employed freelance (fest-frei) reporter, who has worked for German public broadcaster WDR for many years, was directly berated by executives after unintentionally disclosing the existence of government-biased unofficial news guidelines (unspoken rules) within his public broadcaster. From then on, the reporter was removed from duties for over a year—that is, he had not been given a chance to write articles and his suggestions on news items and coverages were dismissed unlike before—and eventually had to leave WDR. The researcher regarded this as a de facto 'dismissal'. Considering this case, at least, it is hard to conclude that 'disciplinary measures taken by the inside (the executive) of a media company against a journalist who did not follow the instructions to fulfil pro-government reporting, did not exist in the German press circles'.

South Korea	Executed by the executives (inside media companies)						Executed by government bodies (outside media companies)						
	In terms of personnel affairs				In producing and reporting an article or journalistic content		Prosecution investigation (following accusations)	Search and seizure (incl. attempts)	Other investigations (eg. tax audit)	Sanctions against reports (by media regulatory agencies)	Instruction for reporting directions (eg. issuance of news guidelines)	Surveillance of media companies or journalists	Restriction/disallowance of covering or reporting
Case No.	Appointment (Election)	Dismissal (Resignation)	Disciplinary actions (suspension, salary reduction)	Demotion (Expulsion)	Sudden launching/abolition	Revision/Discontinuance/Disallowance/Enforcement (incl. attempts)							
1-1		○					○		○				
1-2			○				○	○		●			
1-3	○	○	○	○							○	○	
1-4				○							○	○	
3-1	○	○								○			
3-2	○	●	●	○									
3-3	○		●	○		○							
3-4	○	●	●	●									
4-1		○	○			○							
4-2						●							
4-3						○							
4-4			○			○							
4-5						○							
4-6						○							
5-1				○		○							
5-2				○	○								
5-3			○			○							
5-4			○	○		○							
5-5				○	●								
5-6				○		●							

- This black dot means that influence on media companies or journalists was high in intensity:
 - when it happened for the first time in several decades (or if it was reported as 'very unusual' by media);
 - when the number of objects was more than 30;
 - when it continued over five years.

Figure 21 Execution results of South Korean government influence

Germany	Executed by the executives (inside media companies)						Executed by government bodies (outside media companies)						
	In terms of personnel affairs				In producing and reporting an article or journalistic content		Prosecution investigation (following accusations)	Search and seizure (incl. attempts)	Other investigations (eg. tax audit)	Sanctions against reports (by media regulatory agencies)	Instruction for reporting directions (eg. issuance of news guidelines)	Surveillance of media companies or journalists	Restriction/ disallowance of covering or reporting
Case No.	Appointment (Election)	Dismissal (Resignation)	Disciplinary actions (suspension, salary reduction)	Demotion (Expulsion)	Sudden launching/ abolition	Revision/ Discontinuance/ Disallowance/ Enforcement (incl. attempts)							
1-1						○							○
1-2										○			
1-3											○	●	
1-4		○								○			
1-5					○								
1-6											●		
1-7												○	
1-8											○		
1-9							●						
1-10											●		
1-11										○			
1-12												○	
2-1		○											
3-1	○												
4-1						○							
4-2						○							
4-3						○							
5-1						○							
5-2						○							
5-3						○							

- This black dot means that influence on media companies or journalists was high in intensity:
 - when it happened for the first time in several decades (or if it was reported as 'very unusual' by media);
 - when the number of objects was more than 30;
 - when it continued over five years.

Figure 22 Execution results of German government influence

4.1.5 Frequently Targeted Media

The researcher identified which media the governments mainly targeted to exert influence, and there was a difference in the targeted media's scope (sort) identified in South Korea and Germany. Hence, nominal variables for the targeted media of each country were established differently, and the analysis content is also shown separately as below.

The difference of the two countries in the targeted media's scope (sort) stems from the German government's targeting of individual journalists, which are smaller units than media companies, and foreign major media. Nonetheless, there are some common features found. The first is that both the South Korean and German governments primarily targeted public broadcasters to exert influence, and the second is that there are no cases in which the governments only targeted private broadcasters.

1) South Korea

<Figure 23> illustrates that the main targets on which the South Korean government exerted influence were public broadcasters. Since 15 out of 20 cases (including 3 cases of semi-public broadcasters) correspond to this, it can be said that public broadcasters were overwhelming as targeted media.

It was previously mentioned that large-scale and intense execution results were produced in 'proxy way' cases in which the South Korean government (President) got directly or indirectly involved in the appointment of the CEOs of public and semi-public broadcasters based on the governance structure, and exercised its influence via its proxies (CEOs of public broadcasters).

Another distinctive feature is that there is no case in which the South Korean government only targeted private broadcasters. Unlike public broadcasters, there was no case of 'self-censorship under government influence' practiced by private broadcasters and newspapers, and thereby it can be suspected that there existed collusive ties between the regime and the private media. Case 4-6 supports this suspicion. In September 2013, when the prosecution investigation on the National Intelligence Service's intervention in the presidential election which was related to the Park Geun-hye government birth's corruption was going on, the Presidential Executive Office (Blue House) and the National Intelligence Service attempted to reverse the situation—which is the so-called 'media manipulation'—by requesting cooperation from Chosun Ilbo, a private newspaper friendly to the then regime, to report a 'private life scandal of the public prosecutor general'.

Based on the absence of cases where private broadcasters were targeted and case 4-6, it may be stated that the South Korean government's influence on private media was different in nature from its influence on public broadcasters and was exerted limitedly.

2) Germany

<Figure 24> reveals that public broadcasters were the main target influenced by the German government. There are 4 nominal variables that include a public broadcaster, and 12 cases correspond to them.

The types of targets that the German government exerted its influence on were diverse compared to South Korea. The most notable types are the targets that cannot be found in South Korea, which are individual journalists, online media (blog/website), and foreign major media:

- Case 1-3: 32 domestic and foreign individual journalists who registered to cover the G20 Hamburg summit;
- Case 1-5: Website *Linksunten.indymedia.org*;
- Case 1-6: Foreign major media *BBC*, *New York Times*, *Reuters*;
- Case 1-9: Online blog *netzpolitik.org*;
- Case 1-8: Individual journalists who had written critical articles about defect of the standard rifle used by the Federal Armed Forces (Bundeswehr);
- Case 1-10: At least 7 individual journalists who covered or studied issues related to extreme left-wing/right-wing.

Considering the above targets, it could be stated that the German government's influence on the press was detailed and extensive.

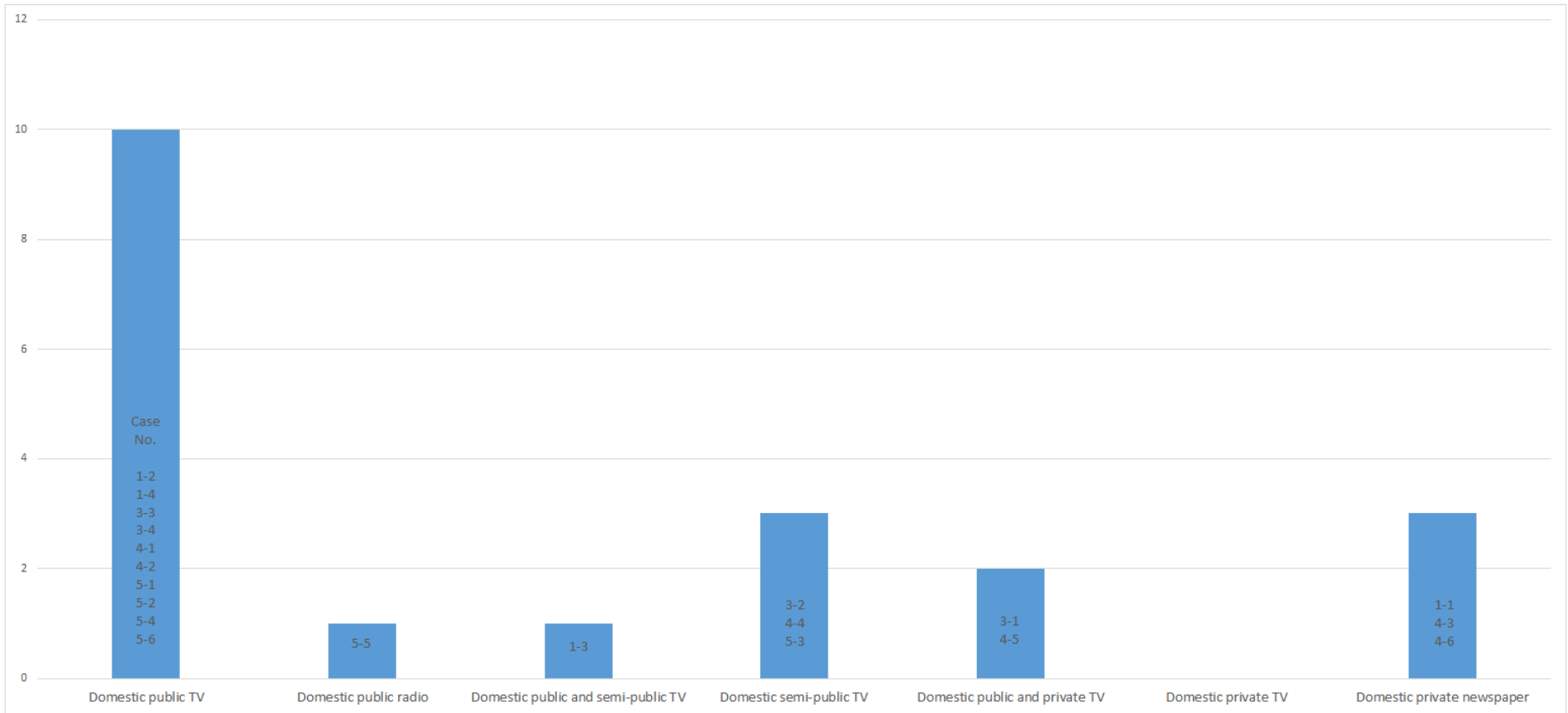


Figure 23 Targets of South Korean government influence

South Korea cases		
Case No.	Target	In detail
1-1	Domestic private newspaper	Segye Ilbo
1-2	Domestic public TV	MBC
1-3	Domestic public and semi-public TV	KBS, MBC, YTN
1-4	Domestic public TV	KBS, MBC
3-1	Domestic public and private TV	* Using the Korea Communications Commission as a means KBS, MBC, YTN and private comprehensive programming channels such as TV Chosun, Channel A, JTBC, MBN
3-2	Domestic semi-public TV	YTN
3-3	Domestic public TV	KBS
3-4	Domestic public TV	MBC
4-1	Domestic public TV	KBS
4-2	Domestic public TV	KBS
4-3	Domestic private newspaper	Kukmin Ilbo
4-4	Domestic semi-public TV	YTN
4-5	Domestic public and private TV	KBS, SBS
4-6	Domestic private newspaper	Chosun Ilbo
5-1	Domestic public TV	MBC
5-2	Domestic public TV	KBS, MBC
5-3	Domestic semi-public TV	YTN
5-4	Domestic public TV	MBC
5-5	Domestic public radio	KBS Radio1
5-6	Domestic public TV	MBC

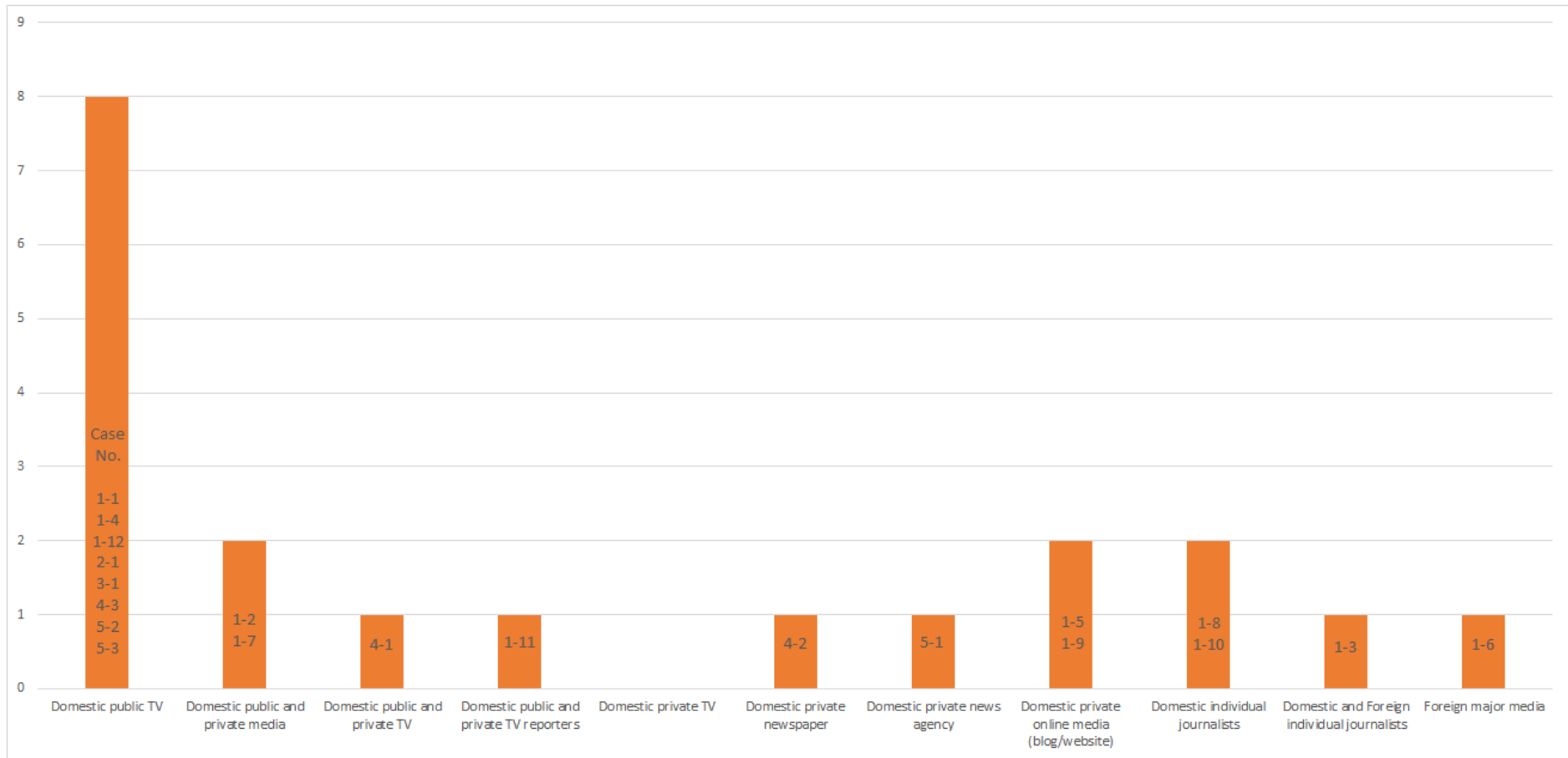


Figure 24 Targets of German government influence

German cases		
Case No.	Target	In detail
1-1	Domestic public TV	ARD
1-2	Domestic public and private media	editors-in-chief and publisher in national and local media
1-3	Domestic and Foreign individual journalists	a total of 32
1-4	Domestic public TV	WDR
1-5	Domestic private online media (blog/website)	Linksunten.indymedia.org
1-6	Foreign major media	BBC, New York Times, Reuters
1-7	Domestic public and private media	local media in the state of Hessen
1-8	Domestic individual journalists	some journalists who are affiliated to Spiegel Online, Die Zeit and Die Tageszeitung
1-9	Domestic private online media (blog/website)	netzpolitik.org and its bloggers
1-10	Domestic individual journalists	at least 7 journalists who covered or researched topics concerning extreme left/right
1-11	Domestic public and private TV reporters	The number of reporters was unknown specifically.
1-12	Domestic public TV	ZDF
2-1	Domestic public TV	ZDF
3-1	Domestic public TV	BR (Bayerischer Rundfunk)
4-1	Domestic public and private TV	ARD, ZDF, RTL, Sat.1
4-2	Domestic private newspaper	Bild and Axel Springer SE (media group owning Bild)
4-3	Domestic public TV	ZDF
5-1	Domestic private news agency	dpa (Deutsche Presse-Agentur)
5-2	Domestic public TV	ARD, ZDF
5-3	Domestic public TV	ARD

4.1.6 Executors getting involved in Government Influence

The researcher identified which organs or performers got involved in the execution of government influence on the press, and a variety of different executors appeared in South Korea and Germany respectively. Hence, the executors of each country were separated and organized, and finally schematized in order to look at all of them at once. Thus, the analysis content is also organized separately as below.

The difference in executor fundamentally results from the fact that South Korea and Germany have respectively different governmental organization structures due to different forms of government—South Korea is a unitary state under a presidential system, while Germany is a federal state under a parliamentary system. Based on its own form of government, executors in South Korea boil down to the keyword ‘President’, a key factor in the government composition and the head of administrative power under the Constitution. On the other hand, in Germany, related organs or performers are mostly associated with the ‘ruling party’ which the researcher added to the government notion (the executive) in a narrow sense through theoretical study—as mentioned in Part 3.1 Operational Definitions of Keywords.

1) South Korea

<Figure 25> shows that almost all of the organs or performers that were involved in the South Korean government’s influence on the press are related to the President—excluding self-censorship cases 5-3, 5-4, and 5-6. In particular, the President directly or indirectly influenced the appointments of the chairman of the Korea Communications Commission, which takes charge of broadcasting sanctions, and the CEOs of public broadcasters.

Earlier, in terms of execution results, it was confirmed that as the South Korean government (President) got directly or indirectly involved in the appointment of the CEOs of public and semi-public broadcasters based on the governance structure, large-scale and intense execution results appeared in ‘proxy way’ cases in which the government exercised its influence through its proxies (CEOs of public broadcasters). It can be understood in this context that the main targets on which the South Korean government exerted its influence were public broadcasters.

The number of organs or performers involved in the South Korean government’s influence is relatively small compared to that of Germany. It is attributed to the limited number of relevant bodies the government can mobilize in order to exert its influence on the press, such as surveillance on journalists and sanctions against media companies.

2) Germany

<Figure 26> demonstrates that almost all of the organs or performers involved in the German government’s influence on the press were associated with the ruling party (CDU/CSU Union)—excluding 5 cases, such as cases 1-8, 1-11, and self-censorship cases. This means that the German government’s influence was exercised centering around the power group (ruling party), not the powerful like in South Korea. One such example is case 4-3 in which the spokesperson for CSU, the ruling party’s sister party, attempted to interfere in reporting by personally calling the ‘heute’ editorial office (ZDF-heute Redaktion) in public broadcaster ZDF.

In Germany with the political system of ‘parliamentary system’, the ruling party (coalition ruling party) is responsible for operations of the administration by forming the federal government (coalition government) cabinet. That is to say, the ruling party leads the federal government (the executive branch). Such processes are applied to other federal states as well.

The organs or performers involved in the German government’s influence are relatively diverse and the number of them is large compared to that of South Korea. It is because each administration of German federal states (Bundesländer) whose state independence (staatliche Eigenständigkeit) is recognized in Germany, a country under federalism, that is, the state governments (Landesregierungen) also exercised influence on the press—just like the federal government. In other words, it is only natural that there are many, diverse organs or performers involved as the federal government and state governments each exercised influence to the press.

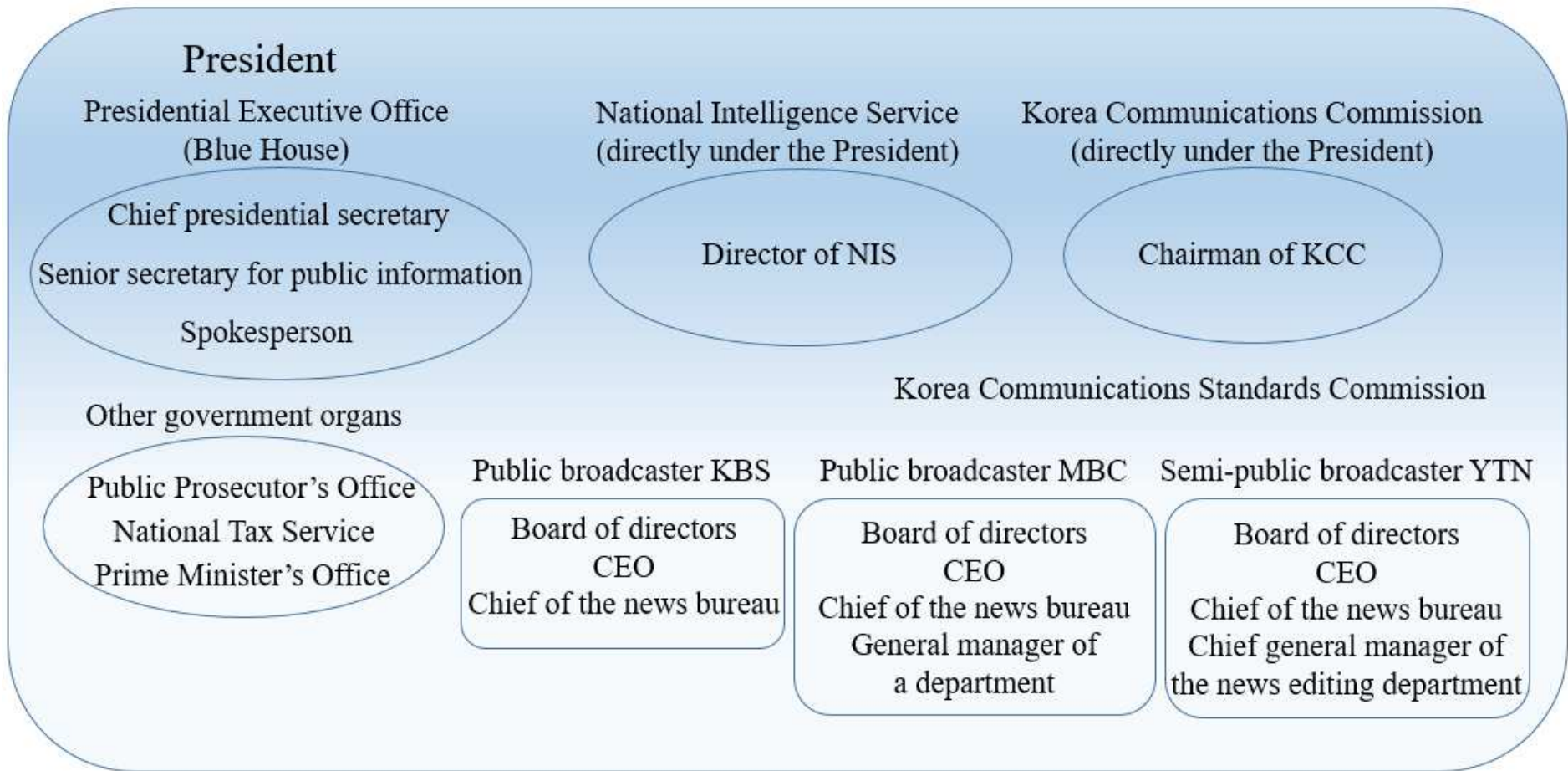


Figure 25 Organs or performers getting involved in South Korean government influence on the press

South Korea cases		
Case No.	Organs or Performers getting involved in government influence	Methods of intention delivery for exerting the influence
1-1	President Presidential Executive Office (Blue House), Chief presidential secretary (Kim Ki-chun) and Presidential secretaries Public Prosecutor's Office, National Tax Service	statement in public * President Park Geun-hye denounced a press company for reporting internal confidential documents containing negative information on her in an open meeting and directly urged the prosecution's investigation into the press company.
1-2	Presidential Executive Office (Blue House) Ministry for Food, Agriculture, Forestry and Fisheries Public Prosecutor's Office, Korea Communications Standards Commission (which is an independent private organization. 6 out of 9 commissioners are recommended by the President and the ruling party and all are finally commissioned by the President.)	instructions in public (according to institutional procedures)
1-3	Presidential Executive Office (Blue House) Prime Minister's Office	instructions in private (according to institutional procedures)
1-4	Presidential Executive Office (Blue House) National Intelligence Service (headed by the closest aide of the President, Won Sei-hoon)	instructions in private (according to institutional procedures)
3-1	President Korea Communications Commission (in which 2 including the chairman out of 5 standing commissioners are directly appointed by the President and one of the remaining 3 are nominated by the ruling party and appointed by the President) chairman of KCC (Choi See-joong, called "mentor" of President Lee Myung-bak)	instructions in public (according to institutional procedures)
3-2	board of directors in semi-public broadcaster YTN (with public corporations under the government as major shareholders) YTN CEO (Koo Bon-hong, President Lee Myung-bak's closest associate who helped the winning of a presidential election)	pressures in private
3-3	President board of directors in public broadcaster KBS (in which 7 out of 11 directors are recommended by the ruling party and all are finally appointed by the President) KBS CEO (Kim In-kyu, President Lee Myung-bak's closest associate who helped the winning of a presidential election)	instructions in public (according to institutional procedures)
3-4	Korea Communications Commission board of directors in public broadcaster MBC (in which 6 out of 9 directors are recommended by the President and the ruling party and all are finally appointed by the Korea Communications Commission)	pressures in private

	MBC CEO (Kim Jae-cheol, journalist on intimate terms with President Lee Myung-bak)	
4-1	Presidential senior secretary for public information (Lee Jung-hyun)	call in person * Presidential senior secretary for public information Lee Jung-hyun called two times to Kim Si-gon, chief of the KBS news bureau.
4-2	Presidential senior secretary for public information (Lee Jung-hyun)	call in person * Presidential senior secretary for public information Lee Jung-hyun called more than 30 times to Gil Hwan-young, CEO of KBS.
4-3	Presidential spokesperson (Lee Dong-kwan)	call in person * Presidential spokesperson Lee Dong-kwan called Byun Jae-woon, editor-in-chief of Kukmin Ilbo.
4-4	Presidential spokesperson (Lee Dong-kwan)	call in person * Presidential spokesperson Lee Dong-kwan called Hong Sang-pyo, chief of the YTN news bureau.
4-5	National Intelligence Service chief of the news bureau in public broadcaster KBS (Ko Dae-young)	requests for cooperation in private * NIS agents met and delivered messages to Ko Dae-young, chief of the KBS news bureau and Ha Geum-yeol, CEO of SBS respectively.
4-6	Presidential Executive Office (Blue House) National Intelligence Service	requests for cooperation in private
5-1	CEO of public broadcaster MBC (Kim Jae-cheol, journalist on intimate terms with the President) * the very person in case 3-4	Self-censorship under government influence
5-2	CEO of public broadcaster KBS (Lee Byung-soon, appointed by the President) CEO of public broadcaster MBC (Kim Jae-cheol, journalist on intimate terms with the President) * the very person in case 3-4	
5-3	chief of the news bureau in semi-public broadcaster YTN (Lee Hong-ryeol) chief general manager of the news editing department (Im Jong-yeol)	
5-4	general manager of a department in public broadcaster MBC (Shim Won-taek, one responsible for producing an investigative journalism program)	
5-5	CEO of public broadcaster KBS (Lee Byung-soon, appointed by the President)	
5-6	chief of the news bureau in public broadcaster MBC (Kim Jang-gyeom)	

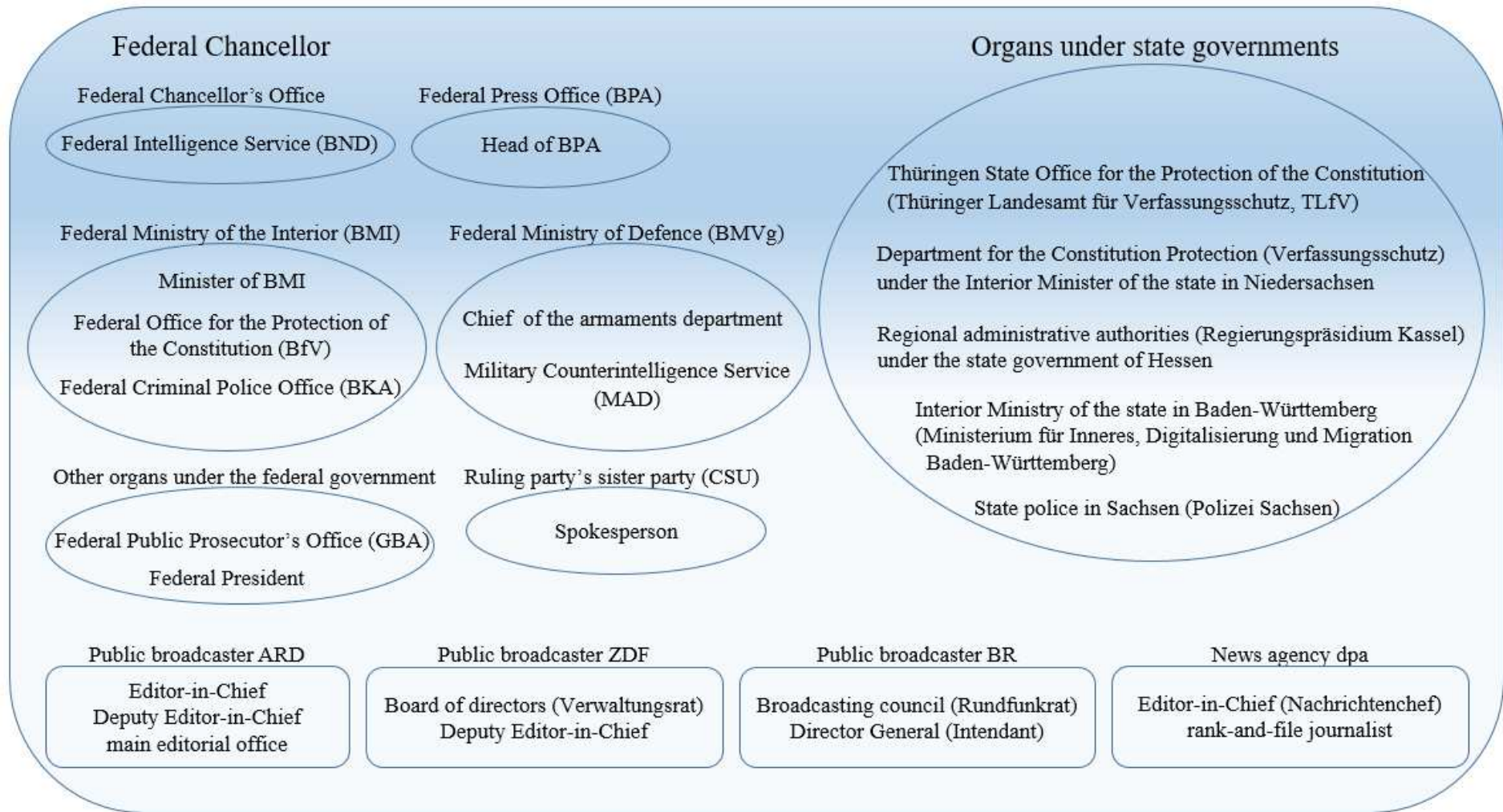


Figure 26 Organs or performers getting involved in German government influence on the press

German cases		
Case No.	Organs or Performers getting involved in government influence	Methods of intention delivery for exerting the influence
1-1	Federal Chancellor's Office (Bundeskanzleramt)	instructions in public (according to institutional procedures)
1-2	Federal Ministry of the Interior (BMI) Federal Minister of the Interior (Thomas de Maizière, CDU)	requests for cooperation in private
1-3	Federal Ministry of the Interior (BMI) Federal Office for the Protection of the Constitution (BfV), Federal Criminal Police Office (BKA) Federal Press Office (BPA)	instructions in public (according to institutional procedures)
1-4	Federal Press Office (BPA)	pressures in private
1-5	Federal Ministry of the Interior (BMI) Federal Minister of the Interior (Thomas de Maizière, CDU) Interior Ministry of the state in Baden-Württemberg (Ministerium für Inneres, Digitalisierung und Migration Baden-Württemberg / Minister Thomas Strobl, CDU)	instructions in public (according to institutional procedures)
1-6	Federal Intelligence Service (BND)	instructions in private (according to institutional procedures)
1-7	regional administrative authorities under the state government of Hessen (Regierungspräsidium Kassel / Hessischer Ministerpräsident Volker Bouffier, CDU)	instructions in public (according to institutional procedures)
1-8	chief (Detlef Selhausen) and vice chief of the armaments department in the Federal Ministry of Defence (Abteilung Ausrüstung, Informationstechnik und Nutzung im BMVg) Military Counterintelligence Service (MAD)	requests for cooperation in private * This started from a proposal from the management of Heckler & Koch, arms manufacturer supplying the standard rifle G36. According to <i>SPIEGEL</i> report, first, the management of Heckler & Koch proposed a secret investigation to the MAD President on November 20, 2013, and the vice chief of the AIN department urged it and shortly afterwards, chief Detlef Selhausen wrote personally to the MAD President on December 6 and once more requested a covert operation of the intelligence agents against the press.
1-9	Federal Office for the Protection of the Constitution (BfV) president of the Federal Office for the Protection of the Constitution (Hans-Georg Maaßen, CDU) Federal Public Prosecutor's Office (GBA) Federal Public Prosecutor General (Generalbundesanwalt Harald Range)	instructions in public (according to institutional procedures) * This was the first time since the 'SPIEGEL affair' in 1962 that an investigation was pursued with the prosecution's applying alleged national treason to journalists.
1-10	department for the Constitution Protection under the Interior Ministry of the state in Niedersachsen (Verfassungsschutz als eine Abteilung des Niedersächsischen Ministeriums für Inneres und Sport) Interior Minister of the state in Niedersachsen (03.2003 - 02.2013, Niedersächsischer	instructions in private (according to institutional procedures)

	Innenminister Uwe Schünemann, CDU)	
1-11	Thüringen State Office for the Protection of the Constitution (Thüringer Landesamt für Verfassungsschutz, TLfV) president of TLfV (1994 - 2000, Präsident des TLfV Helmut Roewer)	instructions in private (according to institutional procedures) * This was done through the establishment of a disguised publishing company (Heron Verlagsgesellschaft) in Erfurt by Helmut Roewer, president of TLfV.
1-12	state police in Sachsen (Polizei Sachsen - Polizeidirektion Dresden) Prime Minister of the state of Sachsen (Michael Kretschmer, CDU)	instructions in public (according to institutional procedures)
2-1	board of directors (Verwaltungsrat) in public broadcaster ZDF (in 2009, within the board of directors in ZDF, directors affiliated to the ruling party (CDU/CSU) had superiority in numbers—total 14, CDU/CSU 9 : 5 SPD.)	instructions in public (according to institutional procedures)
3-1	broadcasting council (Rundfunkrat) in public broadcaster BR (BR broadcasting council elected Ulrich Wilhelm (CSU) with a landslide vote of approval (40/44) in May 2010, when he applied for the director general (Intendant) of BR with maintaining his post as chief of the Federal Press Office and spokesperson for the Federal Government.)	pressures in private
4-1	Federal Chancellor Federal Chancellor's Office (Eva Christiansen, Leiterin der Abteilung Politische Planung, Innovation und Digitalpolitik im Bundeskanzleramt sowie Redenschreiberin) Head of the Federal Press Office and Spokesperson for the Federal Government (Steffen Seibert)	pressures in public
4-2	Federal President (Christian Wulff, CDU)	call in person * Federal President Christian Wulff tried to contact Kai Diekmann, editor-in-chief of Bild but failed and left a threatening text message on the editor-in-chief's mobile phone mailbox. Moreover, he proceeded to personally make a phone call to Mathias Döpfner, CEO of Axel Springer SE, a media group owning Bild.
4-3	spokesperson for CSU, the ruling party's sister party (Hans Michael Strepp)	call in person * CSU spokesperson Hans Michael Strepp called the 'ZDF heute' editorial office in public broadcaster ZDF.
5-1	editor-in-chief of news agency dpa (Froben Homburger, Nachrichtenchef) rank-and-file journalist of dpa	Self-censorship under government influence
5-2	main editorial office in public broadcaster ARD deputy editor-in-chief of public broadcaster ZDF (Elmar Theveßen, Leiter der ZDF-Hauptredaktion „Aktuelles“ und stellvertretender Chefredakteur des ZDF)	
5-3	editor-in-chief of public broadcaster ARD (Kai Gniffke, Erster Chefredakteur von ARD-aktuell) deputy editor-in-chief (Marcus Bornheim, Zweiter Chefredakteur von ARD-aktuell)	

4.1.7 Intention Delivery Methods among Executors

Since the intention delivery among executors presupposes the presence of the executors, the analysis data for this part were arranged in the datasheet of the immediate front part for the understanding of the context.

Furthermore, the analysis content of this part is fundamentally based on the methods of intention delivery that were revealed in detail in the articles concerning each case through online article search. The researcher makes it clear that for the methods of intention delivery that were not revealed, the researcher made inferences about the intention delivery methods from the command system between the organs or performers that were involved in the execution of the governments' influence.

<Figure 27> illustrates through what channel the governments delivered their intentions to relevant bodies or performers when they intended to exert influence on the press, or how they expressed the intentions. Except for 'self-censorship' associated with the type (way) of the exertion of government influence, the number of nominal variables the researcher created is 7.

For Germany, the most striking nominal variable is 'instructions in public'. This means that the government seeking to exercise its influence on the press publicly delivered its intentions to the relevant bodies or performers according to institutional procedures. This includes 7 German cases. At a macro level, there are a total of 10 German cases in which the intentions of the government were delivered according to institutional procedures, whether in public or in private. The reason for such a result is that there are many 'direct way' cases (12 cases) in which the German government mobilized relevant bodies to exert its influence on the press, such as restriction on covering and surveillance on journalists—refer to <Figure 16>.

The unique thing about South Korea is shown in case 1-1, where the President personally exercised influence to the press through 'statement in public'. In a public meeting, President Park Geun-hye urged the prosecution to investigate private newspaper Segye Ilbo that exclusively reported the article unfavorable to herself as well as her secretaries.

What South Korea and Germany have in common is that the method of intention delivery commonly used for the interference in reporting was 'call in person'. However, the achievement rate (success rate) of such a method was not so high:

- South Korean Case 4-1 (Success): The Presidential senior secretary for public information called the chief of the news bureau of a public broadcaster two times;
- South Korean Case 4-2 (Success): The Presidential senior secretary for public information frequently made a phone call to the CEO of a public broadcaster;
- South Korean Case 4-3 (Failure): The Presidential spokesperson called the editor-in-chief of a private newspaper;
- South Korean Case 4-4 (Failure): The Presidential spokesperson called the chief of the news bureau of a semi-public broadcaster;
- German Case 4-2 (Failure): The Federal President sent a mobile message to the editor-in-chief of a private newspaper and then called the CEO of a media group owning the private newspaper;
- German Case 4-3 (Failure): The spokesperson for the sister party of the ruling party called the editorial office in a public broadcaster.

The reason why the performers personally delivered their intentions over the phone was to call for immediate and clear handling and resolving of certain issues. With this, we can see that interference in reporting was carried out when an immediate handling of a particular report was needed—for instance, request/demand for non-reporting, demand/instruction for change in the reporting direction—and that the intentions were often delivered through 'call in person'.

In addition, based on the fact that in South Korea, the same persons (Presidential senior secretary for public information, Presidential spokesperson) repeatedly called media companies on separate issues, there is room for reasonable doubt that their posts were the main route for the interference in reporting.

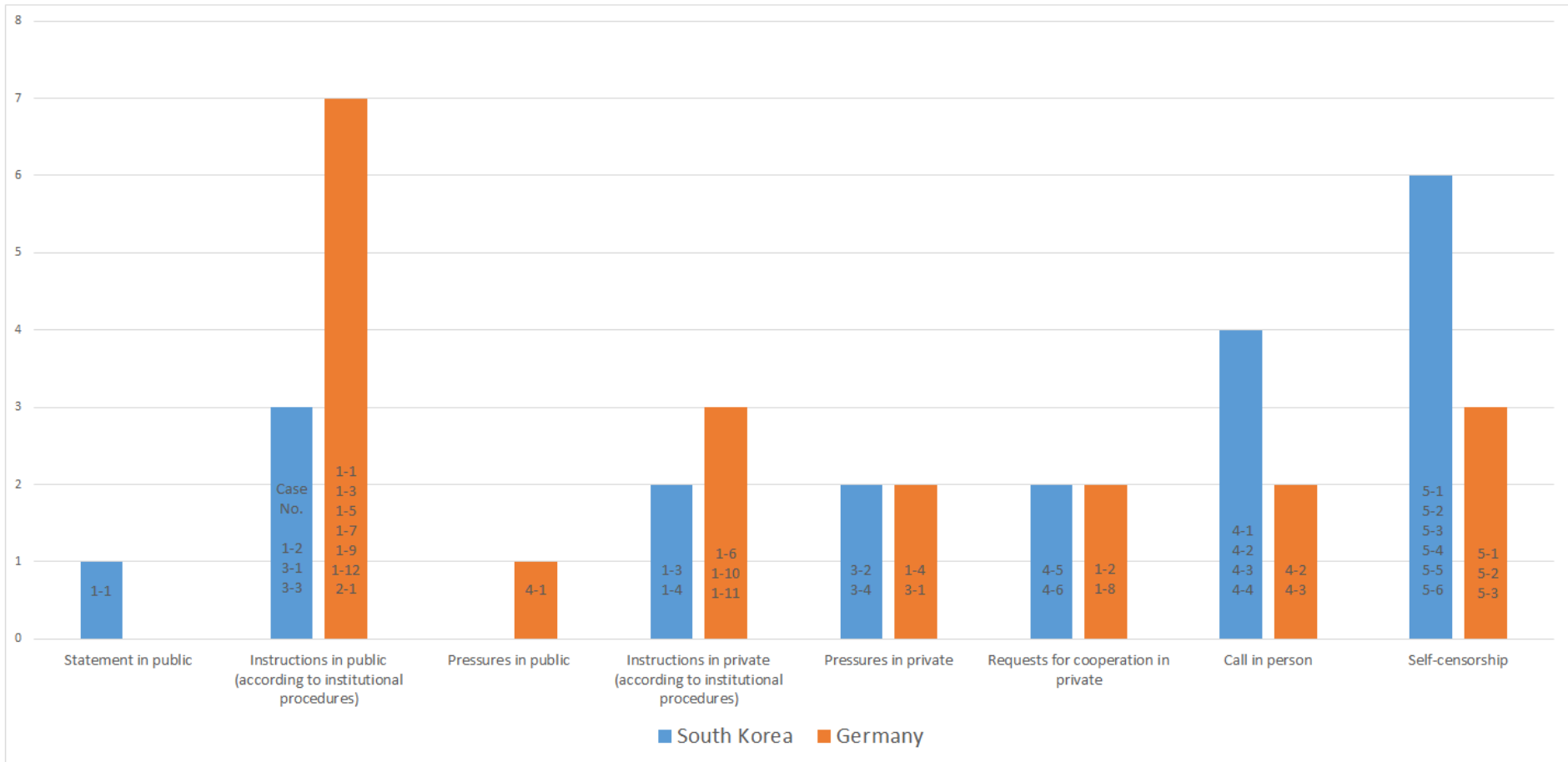


Figure 27 Methods of intention delivery for exerting government influence

4.2 Media Environment's Visible Response (Resistance) to Government Influence

4.2.1 Visibly Responding (Resisting) Subjects and the Timings

<Figure 28> indicates a distinct difference between South Korea and Germany when it comes to the subjects that visibly responded (resisted) to the governments' influence. In South Korea, the 'targeted media company or journalist' of the government's influence resisted directly, whereas in Germany, 'other media companies' actively revealed the fact that the government exerted its influence on the press circles.

However, the timings when they visibly responded (resisted) to the governments' influence do not show any great difference. <Figure 19> and <Figure 20> set out above demonstrate that the timings of the media environment's visible response (resistance)—which are indicated along with the timings of the exertion of government influence by each country—were mostly immediately after the execution of the governments' influence.

In terms of the subjects that responded (resisted) to government influence, 'media/civic organizations' and 'the new government after a regime change' are seen in both countries. This is an indicator that shows the level of awareness of freedom of the press by press circles and civic societies of each country. And it can be seen that there exists a difference in the awareness (respect) of the independence and autonomy of the press depending on the orientations of regimes.

1) South Korea

As reflected in <Figure 28>, in the case of South Korea, the 'targeted media company or journalist', that is, the parties directly concerned personally responded (resisted) to the government's influence. To be more specific, they are the media companies and especially the labor unions or journalists associations of public broadcasters which were the main targets of the government's influence. As the representative organizations that protect and represent the rights and interests of fellow journalists, they responded quickly by clarifying the relevant facts and details through their members (journalists) who have experienced the violation of press freedom.

The specific response (resistance) actions taken by the 'targeted media company or journalist' were varied as follows—refer to the column 'Subjects that visibly respond (resist) and the Timing' in <South Korean Cases' Integrated Datasheet>:

- Protesting rallies or Protests (Cases 3-2, 3-4, 5-2, 5-5);
- Revelation press conferences (Cases 4-1, 4-2);
- Revelations using online media such as YouTube channels and online bulletin boards operated by labor unions (Cases 1-3, 4-3);
- Filed a complaint with the prosecution (Case 5-6);
- Issued a statement of condemnation (Cases 3-3, 4-4, 5-3, 5-4).

Overall, they took active and dynamic actions. Moreover, <Figure 19> demonstrates that the timings of the response (resistance) were immediately after the execution of the government's influence. This shows how strong the will of South Korean press circles to monitor and criticize the government was.

However, given that the South Korean government succeeded in achieving its aim (including partial success) by exerting its influence on the press in 18 out of 20 cases (90%)—refer to <Figure 18>—the limitations and effectiveness of such actions can be pointed out as problems. In this sense, case 4-3 in which the revelation through online media thwarted a high-ranking government official's interference in reporting without difficulty is notable. The labor union of private newspaper Kukmin Ilbo exposed through its online bulletin board the fact that the Presidential spokesperson personally called the editor-in-chief of their company to prevent an article unfavorable to himself from being published; thereby the Presidential spokesperson's attempt to interfere in reporting ultimately failed.

One of the characteristics that is only seen in South Korea is that 'the public' existed as the subject that responds (resists) to government influence:

- Case 1-2: When the Presidential Executive Office (Blue House) and the government ministry in charge complained to public broadcaster MBC for broadcasting critical of the government's major policy, thousands of citizens held candlelight rallies in downtown Seoul to support MBC and, at the same time, criticize the government;
- Case 5-1: When a broadcast of particular content that was to raise an issue about the government's major development policy has been put on hold at the instruction from the CEO of public broadcaster MBC, hundreds of viewers visited MBC headquarters on the night of the scheduled broadcasting to denounce the abnormal broadcast.

'The public' came to the front to respond (resist) to government influence that hinders the public broadcasters from surveilling and criticizing the government—that is, the role of a watchdog. The demonstrations or mass rallies held by 'the public' resulted in dampening of the government's influence which undermined the independence and critical ability of the press. In this regard, 'the public' is a positive factor as an external factor of the South Korean media environment. On the other hand, given that the external factor, not internal factor of the media environment, came forward, 'the public' is also a factor that stands witness to the limitations of the resistance capability in South Korean press circles.

Finally, it is noteworthy that there was only one case of 'other media companies'. As an extension of this result, case 4-3 clearly reveals how much South Korean private media had the will to resist. Although the labor union of private newspaper Kukmin Ilbo raised an issue about a high-ranking government official's interference in reporting and disclosed such facts, which became a serious issue, the newspaper's executives denied any damage caused by the interference in reporting. In other words, it is like the private media voluntarily exonerated the high-ranking government official. Such inside fact also shows the limitations of the resistance capability in South Korean press circles.

2) Germany

As seen in <Figure 28>, in the case of Germany, 'other media companies' more actively exposed or criticized the execution of the government's influence on press circles than the 'targeted media company or journalist'. Specifically, those are private media as shown below:

- Private newspaper *Süddeutsche Zeitung* (Cases 1-11, 4-3);
- Private weekly news magazine *Spiegel* (Cases 1-6, 1-8);
- Private news channel *Welt* (Cases 1-1, 5-3);
- Private newspaper *Frankfurter Allgemeine Zeitung* (Case 4-2);
- Private weekly newspaper *Junge Freiheit* (Case 5-2);
- Private newspaper *Bild* (Case 5-3);
- Media criticism online portal *Übermedien* (Case 5-1);
- News aggregator *Huffington Post* (Case 5-3).

As shown above, the spectrum of the private media involved is broad, including newspapers, magazines, broadcasters and online media, etc. This indicates that the German private media of various forms and tendencies have endeavored to protect the independence and autonomy of their own press circles. Such efforts allow us to positively evaluate the German media environment and further, 'other media companies' display the resistance capability of German press circles. However, it is necessary to take account of the fact that a considerable number of issues exposed or criticized by the private media were related to public broadcasters and that the private media is in competition with public broadcasters.

Meanwhile, the specific response (resistance) actions taken by the 'targeted media company or journalist' were as follows:

- Criticism or revelation using online media such as websites, blogs and twitter, etc. (Cases 1-5, 1-9, 1-12);
- (unintentional) Revelation during broadcast (Case 1-4);
- Roundabout critical report (Case 1-7);
- Issued a statement of condemnation (Case 3-1);
- A meeting for discussion on countermeasures (Case 4-1).

Relatively calm and quiet actions have been taken. Moreover, as indicated in <Figure 20>, all of such actions appeared immediately after the execution of the government's influence. Taken together, it can be viewed that they immediately responded to the execution of government influence but tried a procedural approach—instead of confronting it with physical resistance like South Korea. A typical example is case 1-12 in which a ZDF journalist who was interrupted coverage and filming by state police officers exposed the incident by posting the video taken at the scene on his Twitter. Afterwards, criticisms from press circles, including the journalists association (DJV), and demands for an official clarification from the authorities by ZDF's editor-in-chief ensued. Eventually, one week after the incident, the district police chief apologized to the team of ZDF for the controversial action of the police officers.

Amid such response (resistance) of the media environment, the German government succeeded in achieving its aim by exerting its influence on the press in 14 out of 20 cases (70%) and failed in 6 cases—refer to <Figure 18>. It shows that German press circles' response (resistance) to the government's influence through the procedural approach may challenge comparison with the physical resistance of South Korean press circles in terms of effectiveness.

Furthermore, there are cases in Germany, like South Korea, where the execution of government influence was easily thwarted by criticisms and revelations through online media:

- Case 1-9: Blog *netzpolitik.org* operator and his colleague exposed on their blog that the Federal Public Prosecutor's Office (GPA) was investigating them on national treason charges of having revealed confidential documents and raised the issue, and when it brought on a deluge of public criticism, the prosecution's investigation was closed;
- Case 1-12: After a ZDF journalist who was stopped from coverage and filming by state police officers exposed the incident by posting the on-the-spot video on his *Twitter* and raised the issue, the district police chief apologized to the team of ZDF one week after the incident and the situation was settled.

Therefore, based on the German and South Korean cases, social media and new media such as SNS, which are not easy to block and control and especially can overcome temporal and spatial constraints, can be used as means to immediately respond (reveal, warn or protest) to and neutralize government influence on the press.

Lastly, in German case 1-9, 'the public' that visibly responded (resisted) to the government's influence appears. After the fact that the Federal Public Prosecutor's Office (GPA) was investigating journalists (online bloggers) on national treason charges was revealed by the journalists, about 2,500 citizens held a rally in Berlin to criticize the prosecution's investigation and called for the resignation of the Federal Public Prosecutor General. Although Germany's 'public' is also significant as a responding (resisting) subject, it appeared after the 'targeted media company or journalist', acting as a facilitator. Thus, the weight of Germany's 'public' was different from that of South Korea that became the trigger for the response (resistance) to government influence.

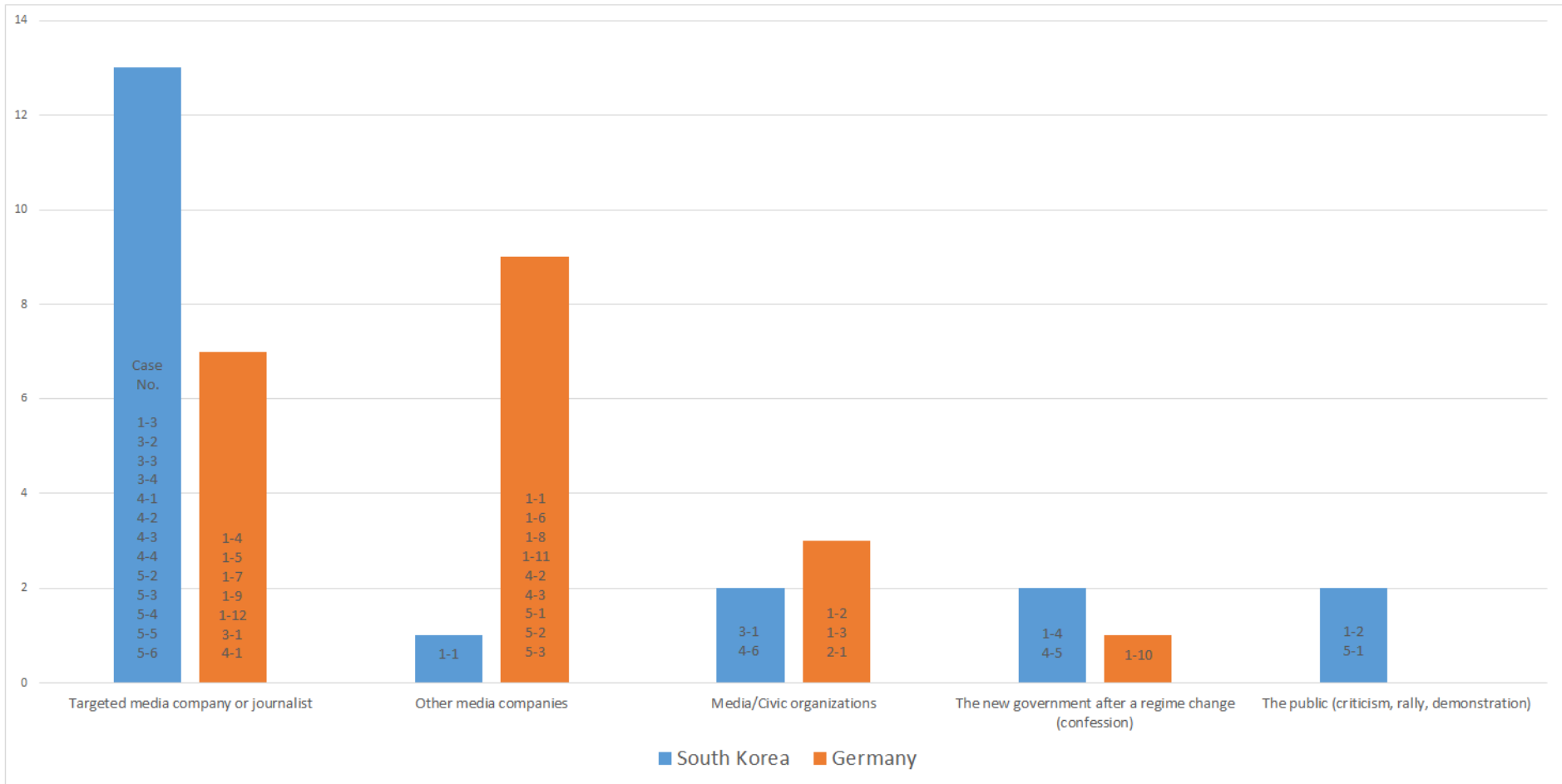


Figure 28 Subjects that visibly responded (resisted) against government influence

* South Korean Cases' Integrated Datasheet

South Korean case				
Case No.	Government influence			Media environment
	Macroscopic intention & Attainment of the aim or not	Timing	Results	Subjects that visibly respond (resist) and the Timing
1-1	Follow-up/ Reactive measure Success	28.11.2014 - 27.02.2015 As a private newspaper reported a scandal involving the President, from the time presidential secretaries accused the newspaper of libel until the newspaper's CEO was dismissed by outside pressure	<p>On November 28, 2014, private newspaper Segye Ilbo exclusively reported an article unfavorable to President Park Geun-hye and presidential secretaries based on classified documents from the Presidential Executive Office (Blue House)—which included the content of a scandal over political involvement and influence-peddling by a secret adviser of the President. Immediately after, eight secretaries filed a complaint against Segye Ilbo's six persons—CEO Cho Han-kyu, the editor-in-chief, the general manager of the social affairs department and three news reporters—for defamation.</p> <p>On December 1, 2014, President Park Geun-hye denounced the leak of classified documents and the report on the content of the documents at a meeting with senior secretaries and urged the prosecution's investigation into the newspaper in person.</p> <p>The Seoul central district public prosecutor's office conducted an investigation into Segye Ilbo's CEO and staff reporters. Meanwhile, on January 21, 2015, the National Tax Service conducted a special tax investigation of affiliates under a particular religious organization (Unification Church), the parent organization of Segye Ilbo.</p> <p>On January 29, 2015, a high-ranking government official called Segye Ilbo's owner (chairperson of Unification</p>	<p>14.11.2016 / Other media companies Two years after the issue, private broadcaster TV Chosun exposed the fact that the Presidential Executive Office (Chief presidential secretary Kim Ki-chun) had instructed to give disadvantages to Segye Ilbo for reporting the article unfavorable to the regime. * Chief presidential secretary (05.08.2013 - 22.02.2015) Kim Ki-chun</p> <p>In an article dated November 16, 2016 by media criticism media Media Today, Cho Han-kyu, former CEO of Segye Ilbo, revealed external pressure and mental damages that he and staff reporters, as well as informants, had suffered since the report 'scandal involving President Park Geun-hye'.</p> <p>On November 21, 2016, the National Union of Media Workers and many civic organizations seeking free press filed a complaint with the prosecution against President Park Geun-hye and ex-chief presidential secretary Kim Ki-chun for abuse of power.</p>

			Church) to force the dismissal of CEO Cho Han-kyu, and Cho was dismissed on February 27.	
1-2	Follow-up/ Reactive measure Success	29.04.2008 - 20.09.2011 As a public broadcaster's current affairs program reported criticism of the government's major policy, from the time the Presidential Executive Office complained to the program's production staff until the staffs were given in-house heavy disciplinary actions	<p>On April 29, 2008, public broadcaster MBC's current affairs program (PD Notebook) aired content raising problems with the safety of US beef, which the government decided to import. Immediately, the Presidential Executive Office (Blue House) and the government ministry in charge complained to MBC. Officially, the Blue House and the Ministry for Food, Agriculture, Forestry and Fisheries accused the program of defamation and dissemination of false information on May 9 and June 20, 2008, respectively.</p> <p>On July 16, 2008, the Korea Communications Standards Commission decided for the first time after closed deliberation that the program should make an 'apology to viewers' for the broadcast content. MBC complied with the commission's decision through its main news magazine on August 12.</p> <p>The Seoul central district public prosecutor's office summoned the production staff to investigate the production processes of the program and also attempted to raid MBC's headquarters twice on April 8 and April 22, 2009; however, all of their attempts failed due to resistance from MBC's labor union members who insisted on it as suppression of the critical report. The prosecution later indicted five staffs and demanded two to three years in prison.</p> <p>On September 2, 2011, the Supreme Court finally delivered that all of the program's production staff were 'not guilty of defamation', whereas MBC's management imposed heavy disciplinary actions (suspension, salary reduction) against four producers on September 20, on the grounds that they produced the controversial content.</p>	<p>02.05.2008 / The public (criticism, rally, demonstration) Three days after the broadcast, thousands of citizens held a candlelight vigil in downtown Seoul and supported MBC's current affairs program, while criticizing the government for compulsorily pushing ahead with US beef import. The civic candlelight vigil lasted more than a month.</p> <p>On June 10, 2008, the content titled 'Are US beef safe from mad cow disease?' of MBC <PD Notebook> was given a special award from the Korean Journalists Association.</p>

<p>1-3</p>	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>11.2008 - 12.2009 The period during which the Presidential Executive Office had instructed the Prime Minister's Office to surveil internal moves in public broadcasters and a semi-public broadcaster and had been reported them through classified documents</p>	<p>Under the instruction of the Presidential Executive Office (Blue House), inspectors of the Prime Minister's Office—whose original duty is to secretly inspect public officials for irregularities and corruption—surveilled and reported internal moves and executives' inclinations/stances in public broadcasters KBS, MBC and semi-public broadcaster YTN:</p> <ul style="list-style-type: none"> · In November 2008, the inspector surveilled and reported moves of the YTN labor union, which had opposed the appointment of the President's closest associate Koo Bon-hong as a CEO, after CEO Koo's inauguration; · on July 27, 2009, the inspector began surveilling the direction of personnel appointment for executives in KBS, MBC and YTN and then, reported the results along with MBC's personnel reform plan on August 11. The results of surveilling the direction of personnel appointment for executives in KBS, MBC and YTN were additionally reported on August 25, September 25 and November 9, 2009; · the report dated September 3, 2009 said that YTN's acting CEO Bae Seok-gyu took control of the organization by demoting staff members unfavorable to the regime through personnel appointments and based on this, "his loyalty to the current government stands out"; · on December 2 and 29, 2009, the inspector reported internal moves in KBS including CEO Kim In-kyu's direction of personnel appointment and reorganization and the in-house atmosphere. <p>The surveillance reports delivered to the Blue House also included plans to steer appointment of executives, and the plans were considerably realized through dismissal, appointment and replacement of executives at each broadcaster. In particular, CEOs, who appeared in the reports, took disciplinary actions to their staff members unfavorable to the regime under various pretexts:</p> <ul style="list-style-type: none"> · at YTN, just after the sudden resignation of CEO Koo 	<p>29.03.2012 / Targeted media company or journalist The KBS new labor union—which was independent of the existing labor union with a leaning towards the government—exposed the classified documents created by the Prime Minister's Office through their YouTube channel (Reset KBS News 9). And the next day, they held a press conference.</p> <p>On April 2, 2012, the YTN labor union held a rally denouncing not only illegal surveillance but also intervention in personnel management including the CEO appointment in front of the Prime Minister's Office and delivered a protest letter.</p>
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			<p>Bon-hong (17.07.2008 - 03.08.2009), the inauguration of new CEO Bae Seok-Gyu (04.08.2009 - 20.03.2015);</p> <ul style="list-style-type: none"> · on August 10, 2009, arbitrary replacement of the chief of the YTN news bureau, Jeong Young-keun → Kim Baek; · imposed suspension, salary reduction or demotion on more than 10 YTN's staff members including Lim Jang-hyuk, who had resisted to the management or criticized the regime. 	
1-4	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>02.2010 - 01.2012</p> <p>The period during which the National Intelligence Service had surveilled internal moves in public broadcasters and drew up classified documents, so-called 'plans to make public broadcasting pro-government' and reported them to the Presidential Executive Office</p>	<p>Under the instruction of director of the National Intelligence Service Won Sei-hoon on February 16, 2010, NIS's intelligence officers surveilled internal moves in public broadcaster MBC and drew up a document on March 2, 2010, which was reported to the Presidential Executive Office (Blue House).</p> <p>* Director of the National Intelligence Service (12.02.2009 - 21.03.2013) Won Sei-hoon</p> <p>The NIS surveilled internal moves and executives' inclinations/stances in public broadcasters KBS and wrote a document and then reported to the Blue House on June 3, 2010.</p> <p>A document dated January 15, 2012 contained key performance accomplished by the NIS—cases of demotion or expulsion of journalists or entertainers unfavorable to the government, as the NIS planned—which was also reported to the Blue House.</p> <p>The classified documents, so-called 'plans to make public broadcasting pro-government', created by the NIS were carried out by the CEOs of public broadcasters MBC and KBS after confirmation by the Blue House. In other words, dozens of TV hosts and guests/panels with tendencies towards government criticism were kicked out, and especially many production staffs of current affairs programs, which have mainly criticized the government,</p>	<p>18.09.2017 / The new government after a regime change (confession)</p> <p>The National Intelligence Service's reform committee, launched by the Moon Jae-in government after the change of government, held a press conference and announced results of the investigation into irregularities and corruptions committed by the NIS under former President Lee Myung-bak.</p> <p>Since then, the prosecution investigated NIS's staffs involved in the preparation of classified documents and also summoned Kim Jae-cheol, former CEO of MBC on November 7, 2017 for questioning on charges of accepting and executing the document (plan).</p> <p>On December 12, 2017, MBC, a party to damage, directly exposed the former government's suppression of the press and damages they suffered in detail on a special broadcast.</p>

			<p>were demoted to other departments. There are more than 10 known cases: entertainers Kim Je-dong, Kim Mi-hwa, Kim Yeo-jin, Yoon Do-hyun and producers Choi Seung-ho, Han Hak-su, etc.</p> <p>* MBC CEO (26.02.2010 - 27.03.2013) Kim Jae-cheol * KBS CEO (24.11.2009 - 23.11.2012) Kim In-kyu</p>	
3-1	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>26.02.2008 - 27.01.2012 From the time President Lee Myung-bak nominated his closest associate as chairman of the commission getting involved in broadcasting policy and sanctions until the chairman resigned</p>	<p>Ahead of the launch (29.02.2008) of the Korea Communications Commission getting involved in broadcasting policy and sanctions, President Lee Myung-bak nominated his “mentor” Choi See-joong as the first chairman of KCC on February 26, 2008. The opposition party made clear its opposition to the nomination by the President. Nevertheless, President Lee Myung-bak pushed ahead with the appointment of KCC chairman Choi See-joong on March 26, 2008.</p> <p>* President Lee Myung-bak decided on chairman Choi’s second consecutive term on March 4, 2011. Chairman Choi quitted midway through a corruption scandal involving his aide.</p> <p>Choi See-joong, chairman of the Korea Communications Commission, met with Kim Keum-soo, chairman of the KBS board of directors twice on March 27 and May 12, 2008. He stigmatized KBS’s CEO Jung Yun-joo, appointed by former President Roh Moo-hyun, as a figure unfavorable to the Lee Myung-bak government and forced the KBS board to take an action for the early resignation of CEO Jung. On August 8, 2008, the KBS board eventually asked the President to dismiss CEO Jung on the grounds of the results (reckless management and deficit operation) of the audit of KBS by the Board of Audit and Inspection and the controversy over biased broadcasting. On August 11, Lee Myung-bak, President who has the authority to appoint KBS’s CEO, dismissed CEO Jung.</p> <p>On August 17, 2008, KCC chairman Choi See-joong, had</p>	<p>28.02.2008 / Media/Civic organizations Immediately after the news became known that the President nominated Choi See-joong as chairman of the Korea Communications Commission, the National Union of Media Workers and civic organizations held an urgent press conference in front of the Blue House, criticizing that the President’s nomination of his closest associate as KCC chairman was deemed “nepotism” that undermines the independence of broadcasting. And they demanded to withdraw the nomination.</p> <p>On March 26, 2008, when President Lee Myung-bak officially appointed Choi See-joong, KCC chairman, media and civic organizations held another rally denouncing the President in front of the Blue House.</p>

			<p>a private meeting with the Blue House officials to discuss the appointment of KBS's next CEO. Since then, Lee Byung-soon (27.08.2008 - 23.11.2009) and Kim In-kyu (24.11.2009 - 23.11.2012) who had helped President Lee Myung-bak win the presidential election, were appointed as KBS's CEOs.</p> <p>During KCC chairman Choi's term of office, the KCC imposed disciplinary measures on several reports and programs that went against the government's stance. For example, on August 11, 2008, the KCC ordered MBC to fulfil the Korea Communications Standards Commission's decision that MBC <PD Notebook> should make an 'apology to viewers' for the broadcast content about "mad cow disease (US beef import)". On March 23, 2011, it gave a 'warning' to KBS for the broadcast content about "naval ship Cheonan sinking incident" on KBS 2TV <In-depth 60 Minutes>.</p> <p>KCC chairman Choi took up the position that he would actively help the successful launch (01.12.2011) of private comprehensive programming TV channels under newspaper companies with conservative tendencies favorable to the then regime, such as TV Chosun, Channel A, JTBC and MBN. Consequently, in October 2011, the KCC allocated channel numbers—so-called 'golden channels'—adjacent to the terrestrial channel numbers to the comprehensive programming channels.</p>	
3-2	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>29.05.2008 - 03.08.2009</p> <p>From the time the board of directors in semi-public broadcaster YTN appointed President Lee Myung-bak's closest associate as CEO of YTN until the CEO resigned</p>	<p>On May 29, 2008, the board of directors in semi-public broadcaster YTN appointed Koo Bon-hong, who had helped President Lee Myung-bak to win the presidential election, as CEO of YTN. At the YTN shareholders' meeting held on July 17, a proposal for the 'appointment of CEO Koo' was accepted just one minute after the opening declaration.</p>	<p>17.07.2008 / Targeted media company or journalist</p> <p>At the YTN shareholders' meeting held to discuss a proposal for the 'appointment of CEO Koo Bon-hong', the YTN labor union members protested against accepting the proposal.</p> <p>The YTN labor union labelled CEO Koo as a "parachute CEO from the government" and staged a protest rally to block him from going to work for 259 days from the day after</p>

			<p>After CEO Koo Bon-hong took office, YTN's management took disciplinary actions against a total of 33 staff members on October 6, 2008: fired six who had led struggles against CEO Koo, including Roh Jong-myun, head of the YTN labor union; suspension six; salary reduction eight; warning 13.</p> <p>In particular, the dismissal of six people was recognized as an unprecedented mass dismissal of journalists since 1992 when two labor union members of public broadcaster MBC were fired for the movement to democratize broadcasting.</p>	<p>his inauguration (18.07.2008 - 01.04.2009).</p> <p>On October 24, 2008, media organizations including the Korean Journalists Association held a rally in front of the YTN building and adopted a resolution condemning the government's suppression of the press signed by 7,847 former and current journalists from 140 media companies nationwide.</p>
3-3	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>19.11.2009 - 23.11.2012</p> <p>From the time the board of directors in public broadcaster KBS nominated President Lee Myung-bak's closest associate as CEO of KBS until the CEO left office after completing his three-year term</p>	<p>On November 19, 2009, the board of directors in public broadcaster KBS asked to appoint Kim In-kyu, who had helped President Lee Myung-bak to win the presidential election, as CEO of KBS without openly evaluating qualifications of five CEO candidates. President Lee directly appointed CEO Kim In-kyu on November 23.</p> <p>KBS's management took disciplinary actions against staff members on each occasion, who had led struggles against CEO Kim or enforced strikes:</p> <ul style="list-style-type: none"> · on December 31, 2009, demotion of two reporters who criticized KBS's government-biased reports. Kim Hyun-seok, head of KBS's Journalists Association, and staff reporter Kim Kyung-rae; · on January 30, 2012, disciplinary actions such as suspension or salary reduction against 13 leaders including its head Eom Gyeong-cheol, of the KBS new labor union that led the 2010 strike; · on July 24, 2012, disciplinary actions such as suspension, salary reduction or reprimand against 18 including Kim Hyun-seok, head of the KBS new labor union that led the long-term strike for 95 days (* on April 28, 2017, the Supreme Court acquitted the KBS new labor union of the strike which the KBS management had defined as illegal). 	<p>19.11.2009 / Targeted media company or journalist</p> <p>A fair number of members of the KBS labor union raised problems with closed and non-transparent procedures for the appointment through a statement, and they called for withdrawal of the CEO nomination as well as reset of the procedure.</p> <p>On November 19, 2009, a civic organization (Social Action for the Expansion of Media Publicness) also labelled the nomination of President Lee Myung-bak's closest associate Kim In-kyu as 'high-handed appointment by the President' and opposed the appointment.</p> <p>On March 11, 2010, hundreds of KBS workers, who withdrew from the existing labor union which recognized CEO Kim In-kyu, gathered and launched a new labor union. The KBS new labor union called for the resignation of CEO Kim In-kyu and normalization of public broadcasting, through strong struggles such as a strike for 29 days in 2010 (01.07.2010 - 29.07.2010) and a long-term strike for 95 days in 2012 (06.03.2012 - 07.06.2012).</p>

			<p>High-level executives supporting CEO Kim In-kyu did not approve a broadcast of content to criticize the government's major policies and pushed ahead with a broadcast favorable to the government:</p> <ul style="list-style-type: none"> · even though the content titled ‘Four major rivers restoration project’ on KBS 2TV program <In-depth 60 Minutes>—which was to point out problems with the government’s major development policy and had been scheduled to air on December 8, 2010—passed its own deliberation, it was arbitrarily cancelled twice by executives. The program's three producers who protested the decision to cancel the broadcast were given disciplinary actions on May 16, 2011; · on October 22, 2011, four days before the by-election, a large-scale special broadcast (four-way live) publicizing the ‘Four major rivers restoration project’ was carried out despite the fact that public broadcasters should not promote government policies that could affect elections. 	
3-4	Pre-emptive/ Planned measure Success	<p>26.02.2010 - 26.03.2013</p> <p>From the time the board of directors in public broadcaster MBC elected a journalist on intimate terms with President Lee Myung-bak as CEO of MBC until the CEO was dismissed</p>	<p>On February 26, 2010, within the board of directors in public broadcaster MBC—while all of three directors recommended by the opposition party abstained in the vote—five out of six directors recommended by the ruling party elected Kim Jae-cheol, a journalist on intimate terms with President Lee Myung-bak as CEO. And CEO Kim Jae-cheol was officially appointed at the MBC shareholders' meeting that day. Jung Sang-mo, a director of the opposition party-side within MBC’s board of directors, said, “The board has become a tool for pro-government broadcasting” and condemned the election result.</p> <p>* MBC's board of directors (Foundation for Broadcast Culture) decided on CEO Kim Jae-cheol’s second consecutive term with a majority approval (5/9) on February 16, 2011; however, it dismissed CEO Kim for appointing executives without prior consultation on</p>	<p>26.02.2010 / Targeted media company or journalist</p> <p>Hundreds of the MBC labor union members held an emergency rally in front of their headquarters to adopt a resolution against the appointment of Kim Jae-cheol as CEO. At this place, several civic organizations (Civic Action to Protect MBC, etc.) also participated in the rally and protested against the CEO appointment.</p> <p>The MBC labor union labelled CEO Kim as a “parachute CEO from the government” and staged a protest rally to block him from going to work on March 2, 2010, the first day of his official work.</p> <p>The MBC labor union called for the resignation of CEO Kim Jae-cheol and normalization of public broadcasting, through strong struggles such as a 39-day strike in 2010 (05.04.2010 - 13.05.2010) and the longest 170-day strike ever in 2012</p>

			<p>March 26, 2013.</p> <p>MBC's management took massive disciplinary actions against staff members, who had led struggles against CEO Kim or enforced strikes:</p> <ul style="list-style-type: none"> · on June 11, 2010, suspension or salary reduction against 41 labor union members, including Lee Geun-haeng, head of the labor union that led struggles against CEO Kim; · on March 5, 2012, when the labor union was on strike, fired six including the labor union's head Jung Young-ha on the grounds of leading strikes and bringing about in-house disturbance; suspension 38; waiting to be demoted 69; a lawsuit filed against 16 executive members of the labor union for 19.5 billion won (about 17.7 million dollars) damages due to the long-term strike. (* on January 23, 2014, the Seoul Southern District Court rejected the MBC management's claim for damages, ruling that the strike by the MBC labor union had aimed at demanding basic conditions for "realizing fair broadcasting" and therefore was justified.) 	(30.01.2012 - 17.07.2012).
4-1	<p>Follow-up/ Reactive measure</p> <p>Success</p>	<p>21.04.2014, 30.04.2014</p> <p>When the presidential senior secretary for public information personally called the chief of the news bureau in a public broadcaster to demand an end to critical reports on the government's coping with a mass casualty incident</p>	<p>When public broadcaster KBS aired critical reports on the government authorities' poor rescue operations amid the mass casualty incident ('Sewol ferry disaster', 304 deaths) happened on April 16, 2014, Lee Jung-hyun, presidential senior secretary for public information, personally called Kim Si-gon, chief of the KBS news bureau, two times on April 21 and 30 to demand to alter the reporting direction. Chief Kim refused, but reports of government criticism were stopped according to instruction of KBS's CEO Gil Hwan-young who accepted the demand from presidential senior secretary Lee.</p> <p>Afterward, Kim Si-gon, chief of the news bureau was under pressure to resign by the Presidential Executive Office (Blue House) and stepped down from his post shortly after a revealing press conference on May 9, 2014.</p>	<p>09.05.2014 / Targeted media company or journalist Kim Si-gon, chief of the KBS news bureau revealed through a press conference that Lee Jung-hyun, presidential senior secretary for public information, had interfered in reporting by calling twice.</p> <p>On June 30, 2016, the National Union of Media Workers and six civic organizations seeking free press released audio files containing the telephone conversations at the time and urged to investigate the truth concerning control of reports on the 'Sewol ferry disaster' and punish those involved.</p>

			<p>Taking a problem with his revelation, KBS's management suspended him for 4 months.</p> <p>* KBS's chief of the news bureau (28.12.2012 - 09.05.2014) Kim Si-gon</p> <p>On December 19, 2017, former presidential senior secretary for public information Lee Jung-hyun was indicted without detention on charges of violating the Broadcasting Act, which was the first case in South Korea since 1987 when the law was enacted—article 4 clause 2 of the Broadcasting Act, “No one shall regulate or interfere with the broadcast programming unless as prescribed by this Act or other Acts.” On January 16, 2020, the Supreme Court sentenced him to a fine of 10 million won (about 9,000 dollars) for violating the independence of broadcasting.</p>	
4-2	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>06.01.2013 - 05.06.2014</p> <p>From the time when President-elect Park Geun-hye's transition team was launched until the board of directors in public broadcaster KBS asked President Park to dismiss CEO Gil Hwan-young</p>	<p>According to the revelation (argument) from Kim Si-gon, chief of the KBS news bureau, interference in reporting began on January 6, 2013, when President-elect Park's transition team was launched ahead of official launch of the Park Geun-hye government (25.02.2013). Since the inauguration of the government, mainly Lee Jung-hyun, presidential senior secretary for public information, had personally called CEO Gil Hwan-young to force pro-government reports—which was to noticeably report news favourable to the government and President, whereas to minimize unfavourable news. Under this background, reports revised in 2013 were more than 30. Typical examples are:</p> <ul style="list-style-type: none"> · CEO Gil instructed the news bureau to conspicuously report the first cabinet meeting chaired by President Park on March 11, 2013; · when a sexual harassment case of a presidential spokesperson took place on May 10, 2013 during President Park's visit to the United States, CEO Gil ordered Kim Si-gon, chief of the news bureau, to scale 	<p>09.05.2014 / Targeted media company or journalist</p> <p>Kim Si-gon, chief of the KBS news bureau revealed on the basis of his daily work log at a press conference that Lee Jung-hyun, presidential senior secretary for public information, had frequently interfered in reporting by using CEO Gil Hwan-young as a route</p> <p>Just after the press conference, KBS's general managers (18 out of totla 27) and deputy general managers (46) strongly demanded the resignation of CEO Gil Hwan-young as a route along with criticism of presidential senior secretary Lee through a statement.</p> <p>On May 12, 2014, 16 media/civic organizations such as National Union of Media Workers, Citizens' Coalition for Democratic Media and People's Coalition for Media Reform, held a press conference and urged KBS's CEO Gil Hwan-young to step down immediately.</p>

			<p>down reports on the case. Consequently, in order to minimize the sex scandal impact, reports focused on achievements of President Park's visit to the US and further, 3 special broadcasts to promote the achievements were urgent programed and aired on May 10, 11 and 18;</p> <ul style="list-style-type: none"> · on May 5, 2014, CEO Gil called an editorial meeting at the news bureau in person and ordered the work as demanded by Lee Jung-hyun, presidential senior secretary for public information—that is, suspension of reports criticizing the government authorities regarding the mass casualty incident. <p>Amid a deluge of public criticism following a revealing press conference by Kim Si-gon, chief of the news bureau, the KBS board of directors asked President Park Geun-hye to dismiss CEO Gil on June 5, 2014, and President Park decided to dismiss. Lee Jung-hyun, presidential senior secretary resigned on June 7.</p> <p>* KBS CEO (23.11.2012 - 05.06.2014) Gil Hwan-young * Lee Jung-hyun served as presidential senior secretary for political affairs (19.02.2013 - 02.06.2013) and then presidential senior secretary for public information (03.06.2013 - 07.06.2014).</p>	
4-3	Pre-emptive/ Planned measure Failure	28.04.2008 When the presidential spokesperson personally called the editor-in-chief of a private newspaper to prevent an unfavorable article about himself from being published	<p>On 28 April 2008, Lee Dong-kwan, presidential spokesperson (former high-level executive of private newspaper Dong-A Ilbo), realized that private newspaper Kukmin Ilbo would soon report his corruption in illegal purchase of a real estate and then, personally called Byun Jae-woon, editor-in-chief of Kookmin Ilbo and asked him not to publish the article. As the editor-in-chief accepted the request, the article was not published in the newspaper dated April 29.</p> <p>In protest against this, the Kukmin Ilbo labor union posted a revealing statement on its online bulletin board and consequently, other media outlets reported both personal</p>	<p>29.04.2008 / Targeted media company or journalist The Kukmin Ilbo labor union revealed the circumstances of interference in reporting by Lee Dong-kwan, presidential spokesperson, through its online bulletin board.</p> <p>On May 2, 2008, media/civic organizations such as National Union of Media Workers, Citizens' Coalition for Democratic Media and People's Coalition for Media Reform, held a joint press conference in front of the Blue House. They regarded Lee Dong-kwan's conduct as not a request but the "abuse of his status as a presidential spokesperson to put pressure on the media company" and urged his resignation. Also, they demanded President Lee Myung-bak to dismiss him.</p>

			<p>corruption of Lee Dong-kwan, presidential spokesperson and interference in reporting by him.</p> <p>On April 30, 2008, Lee Dong-kwan, presidential spokesperson publicly apologized for his controversial conduct (i.e. interference in reporting) but did not resign. President Lee Myung-bak did not respond to outside demands for dismissal.</p> <p>On May 2, 2008, Kukmin Ilbo published a scoop on personal corruption (illegal purchase of a real estate) of Lee Dong-kwan, presidential spokesperson, on a page of its own newspaper although it was belated. As a result, presidential spokesperson Lee failed to interfere in reporting.</p> <p>On May 2, 2008, the opposition party accused presidential spokesperson Lee of abusing his authority due to interference in reporting; however, on December 24, 2008, the prosecution decided that the presidential spokesperson is not charged with abuse of authority, on the grounds of the Kukmin Ilbo-side's denying damage facts.</p>	
4-4	<p>Follow-up/ Reactive measure</p> <p>Failure</p>	<p>07.03.2008</p> <p>When the presidential spokesperson personally called the chief of a semi-public broadcaster's news bureau to demand to revise news content unfavorable to the government</p>	<p>On March 7, 2008 at 14:40, the content titled 'Minority Report' on semi-public broadcaster YTN's news video <Pop-Up> was aired, which satirized and criticized a press briefing by the presidential spokesperson. Just after the broadcast, Lee Dong-kwan, presidential spokesperson, personally called Hong Sang-pyo, chief of the YTN news bureau, and demanded him to revise the content. Chief Hong made producer Lim Jang-hyuk, who produced the content, delete and re-edit some of the content but he refused to comply with the order, arguing that it was satirized based on facts without distortion. Then, chief Hong arbitrarily ordered staffs to stop additionally broadcasting the content and also delete the content video</p>	<p>07.03.2008 / Targeted media company or journalist</p> <p>The YTN Journalists Association and the YTN labor union instantly raised problems with the directions of Hong Sang-pyo, chief of the news bureau, which made staffs stop the broadcast of news content satirizing the government and delete the corresponding online video, and demanded the restoration of the original state.</p> <p>As the popular news content disappeared suddenly, viewers demanded an explanation with strong complaints through 'YTN viewer board'.</p>

			<p>that had been uploaded on YTN website.</p> <p>However, according to instructions of YTN's CEO Pyo Wan-soo who accepted problem-posing and demands of the YTN Journalists Association as well as the labor union and recognized complaints of viewers, an apology statement from chief Hong was posted on YTN website and also the deleted video was restored on March 13, 2008. Furthermore, the original content was rerun on March 15 and 16. After all, interference in reporting by Lee Dong-kwan, presidential spokesperson, failed.</p> <p>After YTN's CEO changed into Koo Bon-hong, who was President Lee Myung-bak's closest associate, on July 17, 2008, producer Lim Jang-hyuk who had created the controversial content was suspended for six months on October 6, 2008.</p>	
4-5	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>04.2009, 07.05.2009</p> <p>When agents of the National Intelligence Service met respectively the chief of a public broadcaster's news bureau and the CEO of a private broadcaster to call for regime-biased reporting</p>	<p>On May 7, 2009, intelligence officers of the National Intelligence Service handed 2 million won (about 1,800 dollars) in cash along with a request for non-reporting of a certain article unfavorable to the NIS to Ko Dae-young, chief of the news bureau in public broadcaster KBS. In fact, no critical report on the NIS appeared, which was expected on KBS's main news magazine on the same day.</p> <p>* Ko Dae-young served as chief of the KBS news bureau (29.12.2008 - 25.02.2010), high-level executive and then KBS's CEO (24.11.2015 - 23.01.2018).</p> <p>In late April 2009, four NIS agents visited Ha Geum-yeol, CEO of private broadcaster SBS, and asked him to actively report the state of the prosecution's investigation into the corruption scandal of former President Roh Moo-hyun as directed by NIS's Director Won Sei-hoon (so-called 'media brainwashing').</p> <p>* Ha Geum-yeol worked as President Lee Myung-bak's chief secretary (12.12.2011 - 24.02.2013), after being</p>	<p>23.10.2017 / The new government after a regime change (confession)</p> <p>The National Intelligence Service's reform committee, launched by the Moon Jae-in government after the change of government, held a press conference and announced results of the investigation into irregularities and corruptions committed by the NIS under former President Lee Myung-bak.</p> <p>On October 26, 2017, the KBS new labor union and the KBS Journalists Association filed a complaint with the prosecution against CEO Ko Dae-young (former chief of the news bureau) on charges of bribery and violation of the Broadcasting Act, etc.</p>

			SBS's CEO (12.03.2007 - 31.12.2009).	
4-6	Pre-emptive/ Planned measure Success	06.09.2013 When a private newspaper friendly to the then regime reported a particular article based on information provided by the Presidential Executive Office (Blue House) and the National Intelligence Service (i.e. the regime's 'media manipulation' by using friendly media)	<p>While Public Prosecutor General Chae Dong-wook was encouraging an investigation into the corruption in which the National Intelligence Service had intervened in the presidential election through manipulation of public opinion, conservative private newspaper Chosun Ilbo exclusively reported a private life scandal (out-of-wedlock child) of General Chae on September 6, 2013. Facts contained in the article were personal information and data stored in public institutions, inaccessible to the public. Afterward, circumstances were revealed that officials of the Blue House and NIS had collected them since June 2013 and handed them to the Chosun Ilbo-side. In other words, the Blue House and the NIS provided a media company friendly to the then regime with information and then asked to report an article like a red herring for a reversal of the situation.</p> <p>On September 13, 2013, a week after Chosun Ilbo's article was published, Public Prosecutor General Chae Dong-wook, who had encouraged the investigation into the Park Geun-hye government birth's corruption, resigned voluntarily.</p> <p>On May 7, 2014, the prosecution decided not to indict Chosun Ilbo reporters and Kwak Sang-do, former presidential senior secretary for civil affairs, who had been accused by civic organizations, on the grounds that their misconduct was not confirmed. * Presidential senior secretary for civil affairs (18.02.2013-05.08.2013) Kwak Sang-do</p>	<p>16.09.2013 / Media/Civic organizations After Chosun Ilbo's article was published, civic organization Press Consumer Sovereignty National Campaign submitted a letter of request to the prosecution to ask to investigate the possibility of illegal surveillance by the Blue House and the Chosun Ilbo.</p> <p>On September 26, 2013, civic organizations such as Korean Women's Association United and Citizens' Action Network filed a complaint with the prosecution against two reporters from Chosun Ilbo and Kwak Sang-do, former presidential senior secretary for civil affairs, for alleged illegal acquisition and leakage of personal information in relation to personal information contained in Chosun Ilbo's article.</p> <p>On October 23, 2017, the National Intelligence Service's reform committee launched by the Moon Jae-in government announced circumstances of irregularities and corruptions committed by the NIS under former President Park Geun-hye.</p>
5-1	Pre-emptive/ Planned measure Partial	17.08.2010 When a public broadcaster's CEO called for a preview of his current affairs program, which	On August 17, 2010, the day the content titled 'Four Major Rivers Restoration Project: Secret of six-meter water depth' on public broadcaster MBC's current affairs program <PD Notebook> was scheduled to air—which would point out problems with the government's major	17.08.2010 / The public (criticism, rally, demonstration) On the night when MBC's <PD Notebook> was aired with excluding the content titled 'Four Major Rivers Restoration Project: Secret of six-meter water depth', hundreds of viewers visited MBC's headquarters to denounce CEO Kim

	Success (Partial Failure)	would raise problems with the government's major development policy, and further ordered to put broadcast of particular content on hold	<p>development policy—CEO Kim Jae-cheol demanded a preview. The program's production staffs rejected the CEO's demand for a preview (in fact, 'pre-censorship'), calling it an arrogation by the CEO. Then, CEO Kim ordered to put broadcast of the content on hold and the content was unable to air.</p> <p>The content was partially deleted and revised and CEO Kim checked the re-edited version, and then the content aired on August 24, 2010. As a result, self-censorship by CEO Kim Jae-cheol was partially successful (partially failed).</p> <p>On March 3, 2011, six producers of <PD Notebook>, including Choi Seung-ho who had created the controversial content, were demoted to less important posts without notice.</p>	<p>Jae-cheol for the abnormal broadcast.</p> <p>On August 18, 2010 at 08:00, the MBC labor union staged a protest in front of the CEO office, against CEO Kim Jae-cheol's order to put broadcast on hold.</p>
5-2	Pre-emptive/ Planned measure Success	<p>29.10.2008 - 15.11.2008, 30.08.2010 - 29.10.2010</p> <p>From the time the CEOs of public broadcasters decided to abolish their current affairs programs which were in the forefront of government criticism, until they pushed ahead with the abolition</p>	<p>Only two months after the inauguration of public broadcaster KBS's CEO Lee Byung-soon, the executives reported to the board of directors on October 29, 2008 a plan to abolish their current affairs program <Live Current Affairs Tonight> and media criticism program <Media Focus>. These programs were in front of mainly criticism of the government, ruling party, and conservative newspapers (Chosun, Joongang, Dong-A) friendly to the then regime. Despite opposition from the programs' production staff and their colleagues, the CEO and executives did not withdraw their plan and eventually, the two programs were abolished on November 13 and 15.</p> <p>14 out of a total of 18 production staffs such as reporters and producers, who had worked for the two programs and strongly opposed the abolition, were demoted and scattered.</p> <p>On August 30, 2010, at an executive meeting presided</p>	<p>30.10.2008 / Targeted media company or journalist</p> <p>Soon after the plan to abolish the KBS current affairs programs became known, the programs' production staff started an in-house picket protest against the abolition. Later, members of the KBS Producers Association and Journalists Association issued each statement and staged a sit-in demonstration in front of the executive's office, and held a protest to demand withdrawal of the abolition plan.</p> <p>On October 30, 2008, the National Union of Media Workers, in a statement, defined the attempt to abolish current affairs programs criticizing the government by the public broadcaster itself as a "self-inflicted act that undermines publicness" and "governmental broadcasting-oriented tendency", and urged its immediate halt.</p> <p>01.09.2010 / Targeted media company or journalist</p> <p>Immediately after the news of the tentative decision to abolish the MBC current affairs programs became known,</p>

			<p>over by public broadcaster MBC's CEO Kim Jae-cheol who was on intimate terms with President Lee Myung-bak, the abolition of their current affairs programs <News Plus> and <World Wide Weekly>, which had mainly reported problems of government policies in depth, was tentatively decided. And that was determined at an executive meeting on 27 September. As a result, the two programs were abolished on October 7 and 29, respectively, despite opposition from staff members. After the abolition of <News Plus>, an audition entertainment show program was newly launched for the time-slot in November 2010.</p>	<p>the programs' production staff held an emergency meeting and discussed countermeasures. Since then, they and their colleagues such as producers and reporters staged a sit-in demonstration to convey the will of opposition to the abolition and also held a protest.</p>
5-3	<p>Follow-up/ Reactive measure</p> <p>Success</p>	<p>20.06.2013</p> <p>When the chief general manager of the news editing department in a semi-public broadcaster directed to stop broadcasting their scoop report on corruption of a national intelligence agency under the connivance of the chief of the news bureau</p>	<p>While the corruption in which the National Intelligence Service had intervened in the presidential election through manipulation of public opinion was on everyone's lips day after day, semi-public broadcaster YTN aired a scoop report on June 20, 2013 at 05:00 that revealed another manipulation of public opinion by the NIS. Right after the broadcast, the report generated a great interest from politicians and other media outlets; however, Im Jong-yeol, chief general manager of the news editing department, he ordered news editors not to air the report any more at 10:00 on the day, saying the report's content was difficult to understand and ambiguous. Lee Hong-ryeol, a superior and chief of the news bureau, condoned chief general manager Im's order to stop broadcasting the report, saying that he respected Im's decision. Hereby, the scoop report that was indirectly related to the Park Geun-hye government birth's corruption, was no longer aired.</p> <p>Later, Ryu Tu-kwon, head of the YTN Journalists Association, who had held a vote of confidence in Lee Hong-ryeol, chief of the news bureau, and announced the result, had his salary reduced for a month on August 23, 2013.</p>	<p>20.06.2013 / Targeted media company or journalist</p> <p>The YTN labor union, in an emergency statement, considered the order to stop broadcasting the scoop report by Im Jong-yeol, chief general manager of the news editing department, as abnormal or unreasonable and criticized.</p> <p>On July 9-12, 2013, the YTN Journalists Association held a vote of confidence in Lee Hong-ryeol, chief of the news bureau, to hold him responsible for suspension of the scoop report, and the result was no confidence (78.4%). The Association announced a no-confidence rate and demanded chief Lee to step down voluntarily.</p> <p>On July 31, 2013, reporter Lee Seung-hyun who had reported the scoop, was given 'the month's broadcast reporter award' from the Korea Broadcasting Journalist Association but he stopped writing the follow-up article that was being prepared.</p>
5-4	Pre-emptive/	23.06.2013	Kim Yun-kook, a reporter for investigative journalism	24.06.2013 / Targeted media company or journalist

	<p>Planned measure</p> <p>Success</p>	<p>When the general manager of a department in a public broadcaster ordered his subordinate reporter to revise an article on the regime corruption several times and finally decided non-reporting of the article</p>	<p>program <Current Affairs Magazine 2580> of public broadcaster MBC, produced the content titled 'What has happened in the National Intelligence Service?', which mainly contained the state of the prosecution's investigation into the corruption in which the NIS had intervened in the presidential election through manipulation of public opinion. Shim Won-taek, general manager of the program production department, directed his subordinate reporter Kim Yun-kook to delete or revise some of the core parts in that content more than eight times, and once again ordered additional revisions on June 23, 2013, the day it was scheduled to air. When reporter Kim refused, he decided not to release that content. After all, that content related to the Park Geun-hye government birth's corruption was not aired unlike the preview broadcast.</p> <p>Since then, general manager Shim excluded reporter Kim from his work under the pretext of holding him responsible for the abnormal broadcast and gave him a disadvantage (lowest grade) in a work evaluation on July 16, 2013. On August 22, 2013, reporter Kim was demoted to another department.</p> <p>Four of reporter Kim's colleagues, who had stood up against Kim's exclusion from work and staged an in-house picket protest demanding resignation of general manager Shim, were placed under 15-day probation on August 12, 2013.</p>	<p>Reporters working for production of MBC's <Current Affairs Magazine 2580>, in a statement, protested general manager Shim Won-taek's arbitrary decision not to release that content, demanding for Shim's resignation.</p> <p>On June 25, 2013, the MBC labor union released an original script of that content, which had not been aired due to general manager Shim's decision, through a special report on its online bulletin board.</p> <p>On June 26, 2013, MBC, KBS and YTN labor unions held a joint press conference at the Press Center, Seoul and pointed out the fact that reports on the NIS's corruptions related to the Park Geun-hye government birth's corruption had been underreported/curtailed or deleted one after another in public broadcasters. They criticized, "We doubt that high-level executives in charge are engaged in a foolish loyalty competition to the government."</p> <p>On June 26, 2013, 22 media/civic organizations including the People's Coalition for Media Reform, also held a press conference and criticized, "Public broadcasters are eager to synchronize themselves with the regime by Keeping an eye on every whim and feeling of the powerful."</p>
5-5	<p>Pre-emptive/Planned measure</p> <p>Success</p>	<p>10.10.2008 - 18.02.2013</p> <p>From the time the CEO and executives of a public broadcaster accepted a presidential radio speech plan made by the Presidential Executive</p>	<p>Only two months after the inauguration of public broadcaster KBS's CEO Lee Byung-soon, the executives of KBS Radio accepted a plan for the radio speech of President Lee Myung-bak on October 10, 2008, which the Blue House announced the day before without prior consultation with broadcasters. So, President Lee's speech was broadcast on KBS Radio1 at 07:15 on October 13.</p>	<p>12.10.2008 / Targeted media company or journalist</p> <p>When news became known that other broadcasters had finally decided not to air a presidential radio speech, KBS Radio producers visited executives in charge of radio broadcast programming and protested strongly in that only KBS accepted a plan for the unilateral presidential speech and would air it alone.</p>

		<p>Office (Blue House) without prior consultation and further decided to regularize the speech broadcast, until the last presidential radio speech was broadcast</p>	<p>* Meanwhile, other broadcasters such as MBC, SBS, and YTN decided not to air it on the grounds of internal concern, opposition, and "violation of political neutrality".</p> <p>On October 15, 2008, the Blue House announced a regularization plan (every other Monday morning) for the radio speech of President Lee Myung-bak, without prior consultation with broadcasters once again. On October 22, 2008, the executives of KBS Radio decided to accept the plan designed by the Blue House and agreed to regularize the speech broadcast with ignoring the concerns and resistance from staff members.</p> <p>Hereby, the speech of President Lee had been aired via KBS Radio1, 109 times for four years and five months (03.11.2008 - 18.02.2013) until President Lee left office.</p> <p>* KBS CEOs during that period: Lee Byung-soon (27.08.2008 - 23.11.2009), Kim In-kyu (24.11.2009 - 23.11.2012), Gil Hwan-young (23.11.2012 - 05.06.2014)</p> <p>* A presidential radio speech was carried out during the Roh Tae-woo military regime (15 times in 1989) and it was the second time under President Lee Myung-bak.</p> <p>Five radio producers, who had argued for abolition of the presidential radio speech and continuously criticized 'governmental broadcasting-oriented KBS', were demoted to local stations on April 5, 2010.</p>	<p>On October 12, 2008, the National Union of Media Workers, in a statement, criticized the Blue House's announcement about the presidential radio speech plan, saying, "The demand for unilateral broadcasting is a violation of broadcasting freedom and independence guaranteed by the Broadcasting Act."</p> <p>On October 13, 2008, right after the first radio speech broadcast of President Lee Myung-bak, KBS Radio producers, in a statement, criticized the executives, saying that they abandoned the autonomy and programming right of broadcasting and turned "public broadcaster KBS into a promotional tool for the regime". On November 3, 2008, the day the first speech broadcast was scheduled after the regularization was decided by the executive, radio producers staged a picket protest in front of the master control room.</p> <p>It was agreed to reform the format of the presidential radio speech broadcast, which was a one-sided and biased way of delivering messages, through regular reorganization; however, the management did not implement the agreement. For this reason, KBS TV and Radio staff members including reporters and producers, held a protest on November 2, 2009 and demanded abolition of the speech broadcast and CEO Lee Byung-soon's resignation.</p> <p>Since then, the KBS new labor union—which was independent of the existing labor union with a leaning towards the government—demanded abolition of the presidential radio speech broadcast, as one of the agenda items, during a long-term strike for 95 days in 2012 (06.03.2012 - 07.06.2012), and the management agreed that on June 5, 2012. However, the abolition of the speech broadcast, as well as the format reform, was never realized until President Lee left office.</p>
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5-6	Pre-emptive/ Planned measure Success	08.2013 - 03.2017 The period during which the chief of the news bureau in a public broadcaster had ordered to minimize reports on issues that could have a negative impact on the Park Geun-hye government or issued self-reporting guidelines to prevent production of articles unfavorable to the government (until President Park Geun-hye was impeached)	<p>Kim Jang-gyeom, chief of the news bureau in public broadcaster MBC, ordered to underreport/curtail reports on issues that could have a negative impact on the Park Geun-hye government or issued self-reporting guidelines to prevent production of articles unfavorable to the government. Based on this, the general managers of departments forced their subordinate reporters to pursue pro-government reports:</p> <ul style="list-style-type: none"> · from the end of August to the middle of September 2013, MBC's main news magazine has never reported the results of a series of trials related to the corruption in which the National Intelligence Service had intervened in the presidential election unlike other broadcasters, although those were a matter of the public attention; · Right after the mass casualty incident ('Sewol ferry disaster', 304 deaths) on April 16, 2014, MBC scaled down related reports amid a deluge of public criticism due to the government authorities' poor rescue operations. In particular, on April 30 and May 2, self-reporting guidelines via an e-mail notification were issued by Kim Jang-gyeom, chief of the news bureau, which were to prohibit reports holding the government responsible for the incident and the use of images criticizing the government. Staff members who did not follow the guidelines were demoted. <p>While Kim Jang-gyeom was working as a high-level executive, MBC biasedly reported on so-called 'Park Geun-hye and Choi Soon-sil-gate' in accordance with its self-reporting guidelines—the gate refers to a scandal over involvement in state affairs and influence-peddling by Choi Soon-sil, a closest associate of President Park:</p> <ul style="list-style-type: none"> · October 24, 2016, the 'Park Geun-hye and Choi Soon-sil-gate' was revealed for the first time. As an anti-President Park rally and another rally standing for President Park began to be held from October 29, video-editing guidelines were issued that ordered editors to 	<p>09.08.2017 / Targeted media company or journalist The MBC labor union and Video Journalists Association filed a complaint with the prosecution against CEO Kim Jang-kyum and accomplices on charges of unfair labor practices and so on, who had identified staff members critical of the government and the management and especially grasped tendencies of camera reporters to create so-called 'Blacklist' and disadvantage them in personnel appointments.</p> <p>On October 31, 2017, the MBC labor union held a press conference and exposed the substance of in-house unfair reporting guidelines, which were issued at the time of Kim Jang-gyeom chief of the news bureau, by providing evidence such as e-mail. The labor union explained, "As if the 'reporting guidelines' were revived during the military regime, the video-editing guidelines for unfair reporting have been systematically issued."</p> <p>On October 31, 2017, the National Union of Media Workers, in a statement, criticized, "Kim Jang-gyeom had concealed the truth of 'Sewol ferry disaster' and dedicated MBC reports to supporters of President Park Geun-hye. In return for this, he was promoted from the chief of the news bureau from the executive director of the news division. Eventually, he got to the CEO position." The National Union urged MBC's board of directors to immediately dismiss CEO Kim Jang-gyeom.</p>
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			<p>minimize the anti-President Park rally which urged her to step down with candlelight, meanwhile to maximize/exaggerate the support rally attended by conservative people holding national flags. Staff members who broke or did not comply with the guidelines were demoted within days;</p> <ul style="list-style-type: none"> · Such regime-biased reports continued until the impeachment of President Park on March 10, 2017. <p>* Kim Jang-gyeom served as chief of the MBC news bureau (22.05.2013 - 25.02.2015), executive director of the MBC news division (26.02.2015 - 23.02.2017) and then MBC's CEO (23.02.2017 - 13.11.2017). He was dismissed on 13 November 2017 for corruption such as orders for unfair labor practices—i.e. coercion of pro-government reports.</p>	
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*** German Cases' Integrated Datasheet**

German case				
Case No.	Government influence			Media environment
	Macroscopic intention & Attainment of the aim or not	Timing	Results	Subjects that visibly respond (resist) and the Timing
1-1	Pre-emptive/ Planned measure Success	12.05.2015 When the Federal Chancellor's Office restricted coverage and reporting of the situation in advance if Chancellor Merkel answered unfriendly questions on the spot	According to the article of Welt, public broadcaster ARD News (Tagesschau) on May 12, 2015 at 17:00, reported a piece of unnaturally edited news in which content unfavorable to the Federal Chancellor was excluded, in relation to the event (Röntgen-Schule Berlin) attended by Chancellor Merkel. Although ARD editors (Redakteure) documented the fact that "we tried to film the Federal Chancellor's answer, but it was blocked" and exposed restriction on covering by the Federal Chancellor's Office, it was not widely known.	13.05.2015 / Other media companies Private news channel Welt criticized the report of public broadcaster ARD News (Tagesschau) on the event attended by Federal Chancellor Merkel the previous day, exposing the truth behind it.
1-2	Pre-emptive/ Planned measure Failure	24.10.2016 When the Federal Ministry of the Interior (BMI) posted a press release on its website that the minister invited editors-in-chief and publishers of national and local media outlets to a media workshop the following year (* ein Medienworkshop mit Chefredakteuren und Herausgebern überregionaler und	Due to criticism from DJV and boycott of AGRA, the media workshop that the Federal Interior Ministry (BMI) was planning to hold in early 2017 was not held. As a result, the Federal Interior Minister's attempt to steer a reporting-direction (Ausrichtung der Berichterstattung) regarding a sensitive issue failed.	28.10.2016 / Media/Civic organizations The German Journalists Association (DJV) considered and criticized the invitation of the Federal Interior Minister (Thomas de Maizière, CDU) as an intention to influence Muslim-related reporting (an attempt to steer a reporting-direction) and urged invited chief editors to boycott the workshop. * The Working Group of the German Public Broadcasting Editorial Committee (AGRA, Arbeitsgemeinschaft der öffentlich-rechtlichen Redakteurausschüsse) criticized the Federal Interior Minister's intention of interference through online on 11 November 2016 and declared a boycott of the workshop.

		regionaler Medien über die mediale Wahrnehmung von Muslimen in Deutschland)		
1-3	Pre-emptive/ Planned measure Success	07.07.2017 When the Federal Press Office (BPA) abruptly revoked accreditation for coverage of certain journalists just before the G20 Hamburg summit, based on data from the Federal Interior Ministry (BMI)	As the Federal Press Office (BPA) notified the sudden revocation of accreditation on the ground of security concerns (Sicherheitsbedenken) raised by the Federal Interior Ministry (BMI), coverage of the G20 summit by 32 individual journalists, who were 9 journalists registered with the DJU and foreign journalists, was frustrated. According to articles by Die Zeit on 19 August and Der Tagesspiegel on 21 August 2017, new indications were revealed that a part of the Federal Criminal Police Office (BKA)'s file entries, which had been a basis for the revocation of accreditation, was based on information from Turkish authorities. The revocation of accreditation was also based on the information of individual journalists illegally collected by the Federal Office for the Protection of the Constitution (BfV). Practically, the accreditation of journalists who have left-leaning tendencies or are unfavorable to certain countries such as Turkey was withdrawn.	07.07.2017 / Media/Civic organizations Shortly after the revocation of accreditation for coverage was known, Frank Überall, chairperson of the German Journalists Association (DJV), protested, calling it completely arbitrary decisions (völlig willkürliche Entscheidungen). He argued that this was interference in press freedom and journalistic activities (Eingriff in die Pressefreiheit und die Berufsausübung der Betroffenen). Cornelia Haß, head of the Union of German Journalists (DJU) considered the revocation of accreditation for coverage illegal and sent a protest letter to heads of the Federal Press Office, the Federal Commission for Data Protection and Freedom of Information and the Federal Criminal Police Office (Regierungssprecher und Bundespresseamts-Chef Steffen Seibert, Bundesdatenschutzbeauftragte Andrea Voßhoff und Präsident des Bundeskriminalamtes Holger Münch).
1-4	Pre-emptive/ Planned measure Success	(* assumed) Since September 2015 Since the Merkel government announced its plan to fully accept Syrian refugees on August 24, 2015, it is assumed that the Federal Press Office (BPA) has unofficially put pressure on public broadcasters regarding	Regarding the remarks—the existence of government-biased unofficial news guidelines (unspoken rules) within a public broadcaster)—WDR executives directly condemned the freelance reporter. The reporter was not fired but was excluded from her own task for more than a year and eventually had to leave WDR (de facto dismissal).	17.01.2016 / Targeted media company or journalist A freelance(fest-frei) reporter who has worked for public broadcaster WDR for many years said on the Dutch radio program (1Limburg “De Stemming”) that public broadcasters were instructed to report positively on the government’s refugee policy: “Wir sind natürlich angewiesen, einigermaßen pro Regierung zu berichten.” This was an unintended revelation of the existence of government-biased unofficial news guidelines (unspoken rules) within a public broadcaster. On January 18, 2016, Ingrid Schmittz, deputy company

		refugee issues.		spokesperson of WDR, denied the reporter's remarks through a press release: "Das entspricht in keinsten Weise der Haltung des Unternehmens."
1-5	Pre-emptive/ Planned measure Success	25.08.2017 When the Federal Ministry of the Interior (BMI) regarded <i>Linksunten.indymedia.org</i> as "the most influential internet platform for left-wing extremists in Germany" and enforced sudden shutdown of the website	Federal Interior Minister Thomas de Maizière (CDU) requested the shutdown of <i>Linksunten.indymedia.org</i> from the state government's Interior Ministry in charge of controlling websites and media in the jurisdiction (Ministerium für Inneres, Digitalisierung und Migration Baden-Württemberg / Minister Thomas Strobl, CDU). Since then, the website has become unavailable.	26.08.2017 / Targeted media company or journalist A day after the shutdown, operators of website <i>Linksunten.indymedia.org</i> criticized the Federal Interior Ministry (BMI) online, promising that they will be back soon. On August 28, 2017, Christian Mihr, director of the Reporters Without Borders Germany (ROG), criticized the measure by the Federal Interior Ministry (BMI) through an online statement, saying that those who commit and urge violence should be punished but closing them down because they are unpleasant media/publications is a violation of press freedom and the constitution. On August 30, 2017, public broadcaster NDR indirectly criticized the Federal Interior Ministry's arbitrary shutdown and procedures by mentioning the meaning of the closed left-wing website and the usefulness in research.
1-6	Pre-emptive/ Planned measure Success	Since 1999 The Federal Intelligence Service (BND) has been surveilling and gathering information on foreign major media since 1999. * As the Federal Intelligence Service (BND) reform bill, which calls for allowing the collection of information on foreign media and journalists, was passed by the Bundestag on October 21, 2016 and went into	According to an article by Spiegel, since 1999, the Federal Intelligence Service (BND) has surveilled at least 50 targets such as telephone, fax, e-mail, etc. from journalists and editorial offices around the world that were affiliated to foreign major media (BBC, New York Times, Reuters), including allied nations like the UK and the US. It was reported that the BND taps large data lines in the form of mass monitoring and filters them with so-called 'selectors'.	24.02.2017 / Other media companies Spiegel, a private weekly news magazine, exclusively published that the Federal Intelligence Service (BND) has been surveilling and gathering information on journalists and editors around the world that were affiliated to foreign major media, since 1999. Shortly after Spiegel's report, on 24 February 2017, Christian Mihr, director of the Reporters Without Borders Germany (ROG), criticized the Federal Intelligence Service (BND) online, saying "Targeted surveillance is a massive violation of press freedom." In addition, Frank Überall, chairperson of the German Journalists Association (DJV), issued a protest statement online and demanded a complete clarification of the incident

		effect in January 2017, it can be seen that the BND's surveillance and collection of information on foreign media has been justified and is ongoing now. (Neues BND-Gesetz, Abschnitt 2 Ausland-Ausland-Fermeldeaufklärung § 6 Voraussetzungen für die Verarbeitung von Daten)		from the federal government, saying "The fundamental right of press freedom does not only apply in Germany and the German foreign intelligence service must also respect this fundamental right abroad."
1-7	Pre-emptive/ planned measure Success	03.08.2015 When the regional administrative authorities under the state government of Hessen (Regierungspräsidium Kassel / Hessischer Ministerpräsident Volker Bouffier, CDU) revoked prior permission to cover refugee accommodations in the Kassel-Calden airfield	The regional administrative authorities under the state government of Hessen (Regierungspräsidium Kassel) notified the revocation of prior permission at night before the coverage, on the grounds that media reports made a negative impression on the state government's view and induced conflict. Spokesperson Michael Conrad (Sprecher des Regierungspräsidiums der schwarz-grünen Koalition in Kassel) argued with past bad experiences, saying "It's absolutely clear that we don't want to expose refugees to cameras." Thereby, local media journalists failed to cover refugee issues such as the situation in which 1,000 refugees were accommodated in emergency shelters built on the Kassel-Calden airfield at the end of July 2015.	04.08.2015 / Targeted media company or journalist Local media HNA (Hessische Niedersächsische Allgemeine) reported a visit to refugee accommodations by the head of the SPD Hessen and at the same time, indirectly criticized the revocation of permission to cover the facilities by the regional administrative authorities (Regierungspräsidium Kassel). According to the article by HNA, head of the SPD Hessen, Thorsten Schäfer-Gümbel, who had planned to inspect refugee accommodations with journalists, said "It is wrong that the media are excluded. To keep quiet about the situation of refugees in emergency shelters is inappropriate." In response, the CDU Hessen accused Schäfer-Gümbel of visiting refugee accommodations just for a political stage or his own media appearance.
1-8	Follow-up/ Reactive measure Failure	26.11.2013, 06.12.2013 When the chief and vice chief of the armaments department in the Federal Ministry of Defence (Abteilung Ausrüstung, Informationstechnik und Nutzung im BMVg) contacted the president of	As there was a rumor that the standard rifle G36 used by the Federal Armed Forces (Bundeswehr) has faults, the management of Heckler & Koch, a private corporation producing and supplying the rifles, requested the MAD president to surveil individual journalists through a proposal ("Gewehr G36 - Genese") on November 20, 2013. And on November 26, 2013, the vice chief of the AIN department urged it and then, AIN-chief Detlef Selhausen wrote personally to the MAD president on	06.05.2015 / Other media companies Spiegel, a private weekly news magazine, exclusively published the fact that in 2013, the chief and vice chief of the armaments department in the Federal Ministry of Defence requested the president of the Military Counterintelligence Service (MAD) to surveil individual journalists by a proposal from the management of Heckler & Koch, a private corporation supplying the standard rifle G36.

		<p>the Military Counterintelligence Service (MAD) in turn to request surveillance of individual journalists who wrote critical articles</p>	<p>December 6 and requested surveillance of the journalists who wrote critical articles regarding the rifle's defects. Press companies affiliated to the individual journalists that the private corporation pointed out as targets for surveillance were <i>Spiegel Online</i>, <i>Die Zeit</i> and <i>Die Tageszeitung</i>.</p> <p>In particular, to ensure that the private corporation's request for surveillance of journalist is accepted, the AIN-chief and vice chief drew up a document explaining the significance and importance of the corporation. Further, it was known that they disseminated even false information (gesteuerte Kampagne) that the journalists, who had written critical articles about the rifle, produced malicious articles to the corporation with colluding with other competing arms manufacturers.</p> <p>However, MAD president Ulrich Birkenheier rejected the request for surveillance on 23 December 2013. In the end, high-ranking officials of the Federal Ministry of Defence (BMVg) failed to surveil journalists. * President of the Military Counterintelligence Service (01.07.2102 - 11.12.2014) Ulrich Birkenheier</p> <p>As to Spiegel's exposure on May 6, 2015, Federal Minister of Defence Ursula von der Leyen (CDU) admitted the fact that the AIN-chef personally sent a letter to the MAD president to support the proposal for journalist surveillance from the private corporation supplying the rifle, and relieved the AIN-chef of his post. However, on 13 May 2015, Minister von der Leyen officially reported to the Bundestag that the Military Counterintelligence Service (MAD) has never accepted calls for surveillance of journalists at any time. * Federal Minister of Defence (17.12.2013 - 07.2019) Ursula von der Leyen (CDU)</p>	<p>Shortly after Spiegel's report, Michael Konken, chairperson of the German Journalists Association (DJV), criticized, "It is a scandal that leading ministry officials seek to use secret service methods to block unwanted reporting."</p> <p>(Although the request for surveillance in 2013 was rejected) according to Spiegel's follow-up article on June 10, 2015, an official (Thomas L.), who had been dealing with the G36 for many years at the Defence Technology Center for Bundeswehr (WTD 91, Wehrtechnische Dienststelle 91), testified at an internal hearing on December 9, 2014 that the MAD had been tracing tipsters (Tippgeber) who could provide journalists with information on the G36's defects in 2011 or 2012 and practically spotted some persons. Thomas L. said the MAD had investigated who had given information to Lars W., a journalist who had reported on the G36's defects several times. * Federal Minister of Defence (03.2011 - 12.2013) Thomas de Maizière (CDU) * President of the Military Counterintelligence Service (05.2010 - 06. 2012) Karl-Heinz Brüsselbach</p> <p>In April 2016, the Reporters Without Borders Germany (ROG) looked back on events that took place in 2015 and stipulated based on internal documents of the Military Counterintelligence Service (MAD) that this was a case having infringed on freedom of the press.</p>
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1-9	Follow-up/ Reactive measure Failure	05.2015 - 10.08.2015 As the Federal Office for the Protection of the Constitution (BfV) accused online blog <i>netzpolitik.org</i> of disclosing unfavorable information about the federal government, from the time the Federal Public Prosecutor's Office (GBA) launched a closed investigation into the bloggers until the end of the investigation	<p>The Federal Public Prosecution began investigating online blog <i>netzpolitik.org</i> in May 2015, and the investigation was conducted behind closed doors under directions from Federal Public Prosecutor General (Generalbundesanwalt) Harald Range. On 24 July 2015, the Prosecution sent a notice notifying the launch of an investigation into alleged national treason to Markus Beckedahl and Andre Meister working for the blog that had disclosed information on a German secret agency.</p> <p>When Federal Public Prosecutor General Harald Range tried to charge the two bloggers with national treason based on an expert opinion that information on the blog corresponds to state secrets—the opinion came from Hans-Georg Maaßen, the accuser and president of the Federal Office for the Protection of the Constitution (BfV)—Federal Minister of Justice and Consumer Protection (BMJV) Heiko Maas (SPD) ordered a suspension of the investigation, raising questions about procedures and methods of the investigation, i.e. listening to the expert opinion. In the end, the Federal Public Prosecution announced the termination of the investigation in a press release on 10 August 2015: “the published content is not involved in a state secret (es handelt sich bei den veröffentlichten Inhalten nicht um ein Staatsgeheimnis).” Thus, an attempt to prosecute the bloggers by the president of the Federal Office for the Protection of the Constitution (BfV) failed.</p> <p>Federal Public Prosecutor General Harald Range was practically dismissed on 4 August 2015 by Federal Minister of Justice and Consumer Protection Heiko Maas who held him to account for the wrong investigation procedures.</p>	<p>30.07.2015 / Targeted media company or journalist <i>netzpolitik.org</i> blog founder and operator Markus Beckedahl and colleague Andre Meister have posted on their blog the fact that the Federal Public Prosecutor's Office (GBA) was investigating an informant and them on national treason charges of having revealed confidential documents based on a complaint of Hans-Georg Maaßen (CDU), president of the Federal Office for the Protection of the Constitution.</p> <p>In response to the investigation by the Federal Public Prosecutor's Office (GBA), media outlets reported that it was the first time since the 'SPIEGEL affair' in 1962 that an investigation was pursued with applying alleged national treason to journalists and criticized this as an “attack on freedom of the press”.</p> <p>Michael Konken, chairperson of the German Journalists Association (DJV), called the prosecution's investigation as a “judicial farce (Justizposse)” and condemned the Federal Public Prosecutor General's actions as an “impermissible attempt to silence two critical colleagues”.</p> <p>More than 2,500 citizens held a rally in Berlin on August 1, 2015, criticizing the prosecution investigating the two bloggers (journalists) on national treason charges, and the demonstrators demanded the resignation of Federal Public Prosecutor General Harald Range.</p>
1-10	Pre-emptive/ Planned	03.2003 - 02.2013 The period when the	Until 2012, the department for the Constitution Protection under the Interior Ministry of the state in	18.09.2013 / The new government after a regime change (confession)

	measure Success	department for the Constitution Protection under the Interior Ministry of the state in Niedersachsen (Verfassungsschutz als eine Abteilung des Niedersächsischen Ministeriums für Inneres und Sport) illegally surveilled and gathered information on journalists covering or studying far-left/right-wing topics	Niedersachsen illegally had surveilled and gathered information on at least seven journalists covering or studying topics related to far-left/right-wing, including Andrea Röpke, Kai Budler, Ronny Blascke and André Aden. Moreover, the department had surveilled even Sven Adam, a lawyer who defended journalists fighting against surveillance, for many years. On 6 November 2013, the Göttingen Administrative Court (presiding judge Thomas Smollich) ruled that it was an unlawful collection of personal information 'without legal basis', and ordered the department for the Constitution Protection in Niedersachsen to delete collected data on Kai Budler, a freelance journalist and editor at local radio station "StadtRadio Göttingen".	Through a press conference, Interior Minister of the state in Niedersachsen Boris Pistorius (SPD) voluntarily admitted and apologized for the fact that the department for the Constitution Protection had illegally surveilled and gathered information on individual journalists during the tenure of Interior Minister Uwe Schünemann (CDU) under the former regime. * The tenure of Uwe Schünemann (CDU) as Interior Minister of the state in Niedersachsen is '04.03.2003 - 19.02.2013'. * At that time, presidents of the department for the Constitution Protection under the Interior Ministry of the state in Niedersachsen: Volker Homuth (2001 - 2006), Günter Heiß (2007 - 2009), Hans-Werner Wargel (01.2010 - 04.03.2013) On 16 October 2014, Interior Minister of the state in Niedersachsen Boris Pistorius (SPD) announced a reform plan of the department for the Constitution Protection for solving the issue of illegal surveillance.
1-11	Pre-emptive/ Planned measure Success	30.10.1997 - 27.03.2001 From the time when the Thüringen State Office for the Protection of the Constitution (Thüringer Landesamt für Verfassungsschutz, TLfV) established a disguised publishing company in order to use journalists as tools for gathering information or materials about right-wing organizations until the company was disbanded	Helmut Roewer, president of the Thüringen State Office for the Protection of the Constitution founded a disguised publishing company (Heron Verlagsgesellschaft) under the false name (Stephan Seeberg) in Erfurt on October 30, 1997. Taking advantage of the publishing company, he instructed TV reporters to bring image and audio materials related to right-wing organizations as much as possible. The reporters were abused as tools for gathering information without knowing the true nature of the publisher. Helmut Roewer was dismissed for alleged corruption on 31 August 2000 by Bernard Vogel (CDU), Prime Minister of the state of Thüringen (1992-2003). Subsequently, the disguised publishing company was decided to disband on March 27, 2001 and was liquidated in 2003. * President of the Thüringen State Office for the Protection of the Constitution (Präsident des TLfV, 1994	17.11.2011 / Other media companies Private newspaper Süddeutsche Zeitung revealed the fact that the Thüringen State Office for the Protection of the Constitution (TLfV) exploited journalists as tools for gathering information in the past. The Union of German Journalists (DJU) called this method "scandalous(skandalös)". Cornelia Haß, head of the DJU, gave severe criticism, saying "This is an absolutely unacceptable abuse of journalistic work. Through such a practice, moreover, all journalists working in this environment are put in danger of being targeted by right-wing radicals."

			– 31.08.2000) Helmut Roewer	
1-12	Pre-emptive/ Planned measure Failure	16.08.2018 When the Sachsen police (Polizei Sachsen - Polizeidirektion Dresden) interrupted coverage and filming unfavorable to the Federal Chancellor	<p>In time for Federal Chancellor Merkel visiting Dresden on August 16, 2018, AfD (a right-wing party towards far-right) and PEGIDA (a xenophobic, racist, nationalistic group and anti-immigrant forces) together held an ‘anti-Merkel demonstration (Die Anti-Merkel-Demo)’. At this time, at a demand of a male demonstrator, Sachsen police officers stopped public broadcaster ZDF’s reporting team (program “Frontal 21”) which was covering the circumstances on the spot, and detained ZDF’s journalist for more than 45 minutes on the pretext of checking his identity and press card. Practically, the police hindered the journalist from covering.</p> <p>While this incident has become an issue with press circles’ raising the problem, Sachsen’s Prime Minister Michael Kretschmer (CDU) posted a comment on Twitter on August 18, 2018 that seemed to defend the police who interfered with the coverage: “The only people who appear serious in this video are police officers. (Die einzigen Personen, die in diesem Video seriös auftreten, sind Polizisten.)”</p> <p>On 21 August 2018 at 21:00, ZDF’s investigative magazine <Frontal 21> aired the video showing the Sachsen police having interrupted the coverage with detaining their reporting team. As a result, the police’s restriction on the unfavorable coverage failed.</p> <p>On August 22, 2018, the male demonstrator (Dresdner Pegida-Demonstrant), who arbitrarily asked the police to check ZDF’s reporting team and caused the initial problem, was revealed as a staff member working for the Criminal Police Office under the Interior Ministry in the state of Sachsen (offensichtlich Mitarbeiter des Sächsischen Landeskriminalamtes).</p>	<p>17.08.2018 / Targeted media company or journalist ZDF reporter Arndt Ginzel, who was interrupted by the Sachsen police, posted the on-the-spot video and brief description on his Twitter account in person and thereby revealed the damage.</p> <p>Michael Hiller, managing director of the DJV Sachsen (Geschäftsführer des Deutschen Journalistenverbands Sachsen) said, “This is an obstruction of the media and damage to freedom of the press. We expect a clarification and an apology from the parties involved, who ultimately prevented their professional activities through this police action.”</p> <p>Peter Frey, ZDF editor-in-chief (ZDF-Chefredakteur) said on 19 August 2018, “It is a clear restriction on free coverage. The team behaved correctly. ZDF demands a clarification of this incident.”</p> <p>Horst Kretzschmar, police chief in Dresden where the incident took place, apologized on August 24, 2018, for the controversial action of police officers against the team (journalist) of ZDF.</p>

			* Interior Minister of the state in Sachsen (Sächsischer Innenminister) Roland Wöllner (CDU)	
2-1	Pre-emptive/ Planned measure Success	27.11.2009 When board members, who were affiliated to the ruling party (CDU/CSU) within the board of directors (Verwaltungsrat) in public broadcaster ZDF, frustrated the term extension of editor-in-chief Nikolaus Brender by taking advantage of their superiority in numbers (in a word, economic disadvantage to a figure who is not friendly to the regime)	Within the board of directors in public broadcaster ZDF, deputy chairman Roland Koch (CDU, Hessischer Ministerpräsident) and other board members affiliated to the ruling party (CDU/CSU) rejected ZDF' director general (Intendant) Markus Schächter's proposal to extend the five-year term of editor-in-chief Nikolaus Brender and they frustrated Brender's term extension under the pretext of poor news ratings on November 27, 2009. * a total of 14 director members in ZDF at the time of 2009, CDU/CSU 9 : 5 SPD Deputy chairman Roland Koch (CDU) justified the opposite of the CDU/CSU Union as "completely legitimate (völlig legitim)" and also said that the decision of the board of directors was made "for the interests of ZDF (zum Wohle des ZDF erfolgt)". On the other hand, chairman of ZDF's board of directors Kurt Beck (SPD, Ministerpräsidentin von Rheinland-Pfalz) said that the motive for Brender's deselection was "irrelevant and motivated by party politics (sachfremd und parteipolitisch motiviert)". On 10 December 2009, ZDF's board of directors chose Peter Frey as the new editor-in-chief to replace Nikolaus Brender, and Brender left ZDF in late March 2010 when his term ended.	28.11.2009 / Media/Civic organizations In the midst of many media outlets' criticizing that political influence worked in the decision of ZDF's board of directors, Ulrike Maercks-Franzen, federal managing director of the DJU (Bundesgeschäftsführerin der DJU), demanded a public debate on the basic conditions needed for independent journalism to accomplish its social mission, on public broadcaster NDR-Info. In the wake of this event, on March 25, 2014, the Federal Constitutional Court (Bundesverfassungsgericht) delivered the following judgment: "The organization of public broadcasting must adhere to the principle of detachment from state authority (<i>Staatsferne</i>). Accordingly, the total share of members who are part of state authority or close to it may not exceed one-third of the statutory members of the respective boards."
3-1	Pre-emptive/ Planned measure Success	06.05.2010 When the broadcasting council (Rundfunkrat) in public broadcaster BR elected the incumbent chief of the Federal Press Office and spokesperson	In early April 2010, Ulrich Wilhelm (CSU), incumbent chief of the Federal Press Office and spokesperson for the Federal Government, applied for the director general of public broadcaster BR with maintaining his public posts, and BR's broadcasting council elected him with a landslide vote of approval (40/44) on 6 May 2010.	15.04.2010 / Targeted media company or journalist Some members of the broadcasting council in public broadcaster BR—Claudia Jung (Freie Wähler), Ludwig Hartmann (Grüne), Heide Langguth (DGB/Gewerkschaften), Robert Stauffer (im Rundfunkrat für Schriftsteller-Organisationen)—criticized, through a joint statement, not only non-transparent procedures in electing a new director

		<p>for the Federal Government as BR's director general (Intendant) with overwhelming approval</p>	<p>Two months after being elected BR's director general, Ulrich Wilhelm stepped down from his public posts in late July 2010 and took office as the director general on 1 February 2011.</p> <p>On 19 March 2015, BR's broadcasting council once again approved director general Wilhelm's another five-year term (33/40).</p> <p>* As BR's director general (Intendant), Ulrich Wilhelm's total term of office 01.02.2011 - 31.01.2021</p>	<p>general (Intendant) but also the candidacy of Ulrich Wilhelm, incumbent chief of the Federal Press Office and spokesperson for the Federal Government. They deemed this as an aspect of "nepotism (Klüngelei)" and deplored that it would be a declaration of bankruptcy for the legally required independence of public broadcasting from the State (<i>Staatsferne</i>) if a long-time government spokesperson smoothly moves into the office of BR's director general.</p> <p>On May 7, 2010, even BR referred to a warning (criticism) from critics in its article which formally announced the election of Ulrich Wilhelm, spokesperson for the Federal Government, as the new director general, and indirectly expressed concern about a breach of the principle of detachment from the State (<i>Staatsferne</i>).</p> <p>There was also external criticism that his move to change from a high-ranking government official into the head of a public broadcaster and his decision to resign only after booking a job at a public institution was unique and brazen as well as a deceitful sign.</p>
4-1	<p>Pre-emptive/ Planned measure Success</p>	<p>07.2017 - 03.09.2017 The period during which the Federal Chancellor's Office intervened in formats and rules for the Federal Chancellor candidate TV debate held by public and private broadcasters, ahead of the federal election for the Bundestag</p>	<p>Four public and private broadcasters (ARD, ZDF, RTL, and Sat.1), which would co-host the Federal Chancellor candidate TV debate three weeks before the federal election for the Bundestag (24.09.2017), wanted to change (modify) formats and rules of the debate in July 2017.</p> <p>However, Eva Christiansen, a senior official of the Federal Chancellor's Office, said such changes could not be accepted and threatened not to participate in the TV debate if the format and rules were changed, and even instructed a direction of how the debate should proceed.</p> <p>* Eva Christiansen, chief of the department of political planning, innovation and digital policy at the Federal Chancellor's Office and speechwriter (Leiterin der</p>	<p>18.09.2017 / Targeted media company or journalist Amid strong public criticism of the Federal Chancellor candidate TV debate, the representatives of the ARD stations, who recognized intervention from the Merkel side as a serious problem, held a meeting and agreed to voluntarily reform the TV debate format before the next 2021 general election to no longer be instructed by the Federal Chancellor's Office.</p>

			<p>Abteilung Politische Planung, Innovation und Digitalpolitik im Bundeskanzleramt sowie Redenschreiberin)</p> <p>Head of the Federal Press Office and spokesperson for the Federal Government, Steffen Seibert intervened and called it “very strange (sehr befremdlich)” that the broadcasters wanted to make such changes to the debate plan without Merkel’s permission.</p> <p>Eventually, as Federal Chancellor Merkel’s insisted on an existing debate format, the Federal Chancellor candidate TV debate on September 3, 2017 proceeded in the past 2013 format that Merkel wanted, without any changes.</p>	
4-2	<p>Pre-emptive/ Planned measure</p> <p>Failure</p>	<p>12.12.2011 When the Federal President contacted high-level executives of a media company to prevent an unfavorable article about himself from being published</p>	<p>On December 12, 2011, Federal President Christian Wulff (CDU) realized that private newspaper Bild would soon report suspicion of his corruption in housing loan and then, tried to contact Bild’s editor-in-chief Kai Diekmann. As this failed, he left a long message on Diekmann’s mobile phone mailbox, containing a threatening content that penal consequences (strafrechtlichen Konsequenzen) would be faced if the article is reported. Also, Wulff personally called Mathias Döpfner, chief executive of media group Axel Springer SE, which owns Bild, to demand a stop to the reporting.</p> <p>On December 13, 2011, nonetheless, Bild reported Federal President Christian Wulff’s suspicion of corruption in private housing loan (Privat-Hauskredit). As a result, the Federal President’s attempt to interfere in reporting failed.</p> <p>Federal President Christian Wulff was accused of infringing on freedom of the press; however, the Berlin public prosecutor’s office stated the content of Wulff’s</p>	<p>31.12.2011 / Other media companies Private newspaper Frankfurter Allgemeine Zeitung exposed the fact that Federal President Christian Wulff had sent a threatening message to the editor-in-chief of private media Bild planning to report suspicion of his corruption</p> <p>In an article dated January 2, 2012, Bild directly disclosed the circumstances of Federal President Christian Wulff’s interfering in reporting and exerting pressure in detail.</p> <p>Many media outlets criticized the Federal President’s message to Bild’s editor-in-chief, considering it as an unjustifiable behavior of the high-ranking government official and an infringement of press freedom.</p> <p>On May 11, 2012, Bild’s two journalists Martin Heidemanns and Nikolaus Harbusch—who had reported Federal President Christian Wulff’s scandal (Wulff-Affäre)—was given ‘Henri-Nannen-Preis’, one of the prestigious awards in the German media landscape.</p>

			<p>message on Diekmann's mailbox, as reproduced in the media, did not fulfil any initial suspicion of attempted coercion or other criminal conduct. So, the prosecuting authority closed the proceedings on January 17, 2012, without opening an investigation into the Federal President.</p> <p>Federal President Christian Wulff announced his resignation on February 17, 2012, shortly after the Hannover public prosecutor's office launched a formal investigation into alleged corruption raised by Bild.</p>	
4-3	<p>Pre-emptive/ Planned measure</p> <p>Failure</p>	<p>21.10.2012</p> <p>When a spokesperson for the ruling party's sister party called a public broadcaster and demanded the exclusion of certain news about the rival party's big event</p>	<p>On October 21, 2012, the day the state party convention of the Bayern SPD was held, Hans Michael Strepp, spokesperson for CSU, the ruling party's sister party, directly called the 'heute' editorial office (ZDF-heute Redaktion) in public broadcaster ZDF. He demanded the exclusion of news about the SPD convention from the editor on duty (der diensthabende Redakteur).</p> <p>ZDF's editor rejected the demand and reported news about the SPD convention on 'heute' as it was. In the end, interfere in reporting by the spokesperson for the ruling party's sister party ended in failure.</p> <p>CSU spokesperson Hans Michael Strepp resigned his position on October 25, 2012, amid public criticism of his attempt to interfere in reporting.</p>	<p>24.10.2012 / Other media companies</p> <p>Private newspaper Süddeutsche Zeitung exposed the fact that CSU spokesperson Hans Michael Strepp attempted to interfere in reporting by demanding the exclusion of certain news to public broadcaster ZDF.</p> <p>Shortly after the exposure by Süddeutsche Zeitung, ZDF's editor-in-chief Peter Frey acknowledged and criticized CSU spokesperson Hans Michael Strepp's interference in reporting, saying that Strepp had to answer the question of why and with what intention he had directly called the 'ZDF heute' editorial office.</p>
5-1	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>08.06.2016</p> <p>When a news agency accepted a government spokesperson's distorted claim without confirmation of facts and consequently reported a favorable article to the federal government</p>	<p>On June 7, 2016, the Federal Criminal Police Office (BKA) first published the nationwide statistics on crimes committed by immigrants. In this regard, a spokesman for the Federal Interior Ministry (BMI) told a rank-and-file journalist of private news agency dpa (Deutsche Presse-Agentur) on the phone: "Immigrants are not more criminal than Germans. (Zuwanderer sind nicht krimineller als Deutsche.)" There was a discrepancy between the spokesperson's remark and the statistics in</p>	<p>16.06.2016 / Other media companies</p> <p>Übermedien, an online portal for media criticism, criticized dpa's article which unquestioningly cited a distorted claim by a government spokesperson—i.e. pro-government tendencies for reporting.</p> <p>Except for dpa, other news agencies such as AFP quoted an undoubtedly accurate passage in the press release instead of the remark from the spokesperson for the Federal Interior</p>

			<p>the press release, and even though it was an unverified claim, dpa's journalist wrote and transmitted an article with directly quoting the remark as the title.</p> <p>The article written by dpa's journalist, who unquestionably accepted the distorted claim of a government spokesperson without confirmation of facts, was reported the next day (June 8) as it was, through numerous media outlets that were dpa's clients. As a result, the article has resulted in a positive impact on the federal government's policy to accommodate refugees.</p> <p>There were several opportunities to recheck or correct the content (spokesperson's remark) of the article in question, but the content has not been revised. Since June 9, 2016, some blogs and media raised an issue of the spokesperson's remark and the content of dpa's article. In response, dpa's editor-in-chief Froben Humberger defended the remark made by the spokesperson for the Federal Interior Ministry and at the same time, rationalized their reporting—that is, he asserted the legitimacy of their article.</p>	<p>Ministry (BMI) misleading the facts: "A far greater proportion of immigrants did not commit crimes. (Der weitaus größte Anteil der Zuwanderer beging keine Straftaten.)"</p>
5-2	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>17.10.2016</p> <p>When public broadcasters made a non-reporting decision on a murder case committed by the suspect who was believed to be an immigrant (refugee), despite high public interest in violent crimes involving refugees</p> <p>* It is can be seen that the public broadcasters did not report a particular</p>	<p>On October 17, 2016, shortly after a murder case ('Alster-Mord') in which an immigrant (refugee) was suspected to be the criminal, took place in Hamburg, the incident made headlines in media outlets across Germany. Meanwhile, the main news magazines of public broadcasters, ARD-Tagesschau and ZDF-heute, did not report the incident at all. Moreover, no related articles were posted on the broadcasters' online website (tagesschau.de, heute.de).</p> <p>In the wake of a series of complaints from viewers, ZDF's deputy editor-in-chief Elmar Theveßen advocated his organization on October 27, 2016, explaining the reasons for the non-reporting through Twitter (account of ZDF</p>	<p>20.10.2016 / Other media companies</p> <p>Junge Freiheit, a private weekly newspaper, criticized the practice of non-reporting of a particular affair unfavorable to refugees by major public broadcasters ARD and ZDF</p> <p>On the grounds that reports on crimes involving refugees (immigrants) could have a negative impact on the federal government's policy to accommodate refugees, public broadcasters have been passive in reporting such affairs, the public viewed. So, the public also raised a problem with the practice of non-reporting by ARD and ZDF.</p>

		<p>affair that could negatively affect a policy of the federal government, ignoring the press code (Pressekodex) issued by the German Press Council.</p>	<p>heuteplus): “It is not the decisive criterion for us what ethnic background a perpetrator has. Unless it is necessary to know for understanding the crime, the important thing is to know the facts. Even though there are only indications that the perpetrator has a migrant background, that is not enough yet.”</p>	
5-3	<p>Pre-emptive/ Planned measure</p> <p>Success</p>	<p>03.12.2016 28.12.2017</p> <p>When a public broadcaster's editor-in-chief made a non-reporting decision on murder cases committed by refugees, despite high public interest in violent crimes involving refugees</p> <p>* It can be seen that the public broadcaster's editor-in-chief did not report a particular affair that could negatively affect a policy of the federal government, ignoring the press code (Pressekodex) issued by the German Press Council.</p>	<p>On December 3, 2016, the police held a press conference following the arrest of a minor refugee who had raped and murdered a female college student in Freiburg ('Mordfall Maria L.'). While other media outlets, including ZDF-heute, reported the fact that the criminal was arrested, ARD- Tagesschau decided not to report the incident.</p> <p>ARD's editor-in-chief Kai Gniffke defended his organization on December 4, 2016, explaining the reasons for the non-reporting in Tagesschau-Blog: “I find it infinitely difficult to explain now in a quasi-technocratic way about what news criteria we used to evaluate this case. Because it is a matter of a human life. The editors at Tagesschau are not insensitive. But we only rarely report on individual criminal cases.”</p> <p>ARD-Tagesschau's editorial office wrote on Facebook: “This criminal case has a regional meaning. Since the suspect is a 17-year-old, the special protection of young people and adolescents must be observed in all reporting – regardless of their origin.”</p> <p>A year later, there was another crime ('Mordfall Mia V.') in which a minor refugee killed a girl of the same age in Kandel, Rheinland-Pfalz. The next day, on December 28, 2017, public broadcasters such as ZDF and SWR reported the criminal case, while ARD-Tagesschau did not report it.</p>	<p>04.12.2016 / Other media companies</p> <p>Private newspaper Bild criticized ARD's self-contradiction and inconsistent reporting criteria with an article showing the fact that ARD-Tagesschau had reported domestic and foreign horrific criminal cases in the past, unlike the remarks (reasons for non-reporting) of ARD's editor-in-chief.</p> <p>Frank Überall, chairperson of the German Journalists Association (DJV), disagreed with ARD-Tagesschau's editorial office position that this case had a purely 'regional meaning (eine regionale Bedeutung)' and contradicted ARD-Tagesschau: “The racist classification of interested parties must be described as such, and the objective backgrounds and the social classification of problematic situations must also be presented.”</p> <p>Even the ruling party CDU's deputy federal chairwoman (stellvertretende CDU Bundesvorsitzende) Julia Klöckner was critical of ARD's decision: “Why didn't the Tagesschau report about it as it does with other cases? Keeping quiet doesn't help and rather makes things worse.”</p> <p>28.12.2017 / Other media companies</p> <p>Media outlets such as Welt and Huffington Post criticized the reporting practice of ARD for ARD-Tagesschau's decision not to report the murder case committed by a refugee on December 28, 2017.</p>

			<p>ARD's deputy editor-in-chief Marcus Bornheim wrote the reasons for the non-reporting on Facebook (account of ARD-Tagesschau) on December 28, 2017: "The police are still at the beginning of their investigation and therefore we are keeping a low profile. The motive is currently unclear."</p> <p>* ARD's editor-in-chief (Erster Chefredakteur von ARD-aktuell, 2006 - 08.08.2019) Kai Gniffke</p> <p>* ARD's deputy editors-in-chief (Zweiter Chefredakteur von ARD-aktuell): Christian Nitsche (05.2014 - 03.2017), Marcus Bornheim (04.2017 - 09.2019)</p>	
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Chapter 5. Study Results II: In-depth Interview

The in-depth interview of this study aimed to grasp how interviewees perceived their government's influence on the press and what the reasons/backgrounds for their perceptions were through questions based on the provisional results of the case study carried out earlier.

In 'Chapter 2. Literature Review and Theoretical Study' above, things governments exert on the press were sorted into control, regulation and influence theoretically. The researcher sought to deduce the media environment of each country by allowing interviewees to externalize what perceptions they had of 'something their government exerted on the press' and how they perceived their media environment.

5.1 Perceptions of Government Influence: What do you think your government exerted on the press in the 21st century?

To look at the perceptions of interviewees from each country at a glance, their perceptions were separately tabulated by country. Therefore, the analysis contents are also separated and organized as below.

5.1.1 South Korean Interviewees' Perceptions

<Figure 29> demonstrates that a number of South Korean journalists perceived that their government exerted 'control' over the press at the times related to the collected cases. Such perception was identified from both journalists working (or having worked) in public broadcasters and ones in private media. Moreover, each of their careers or positions vary from CEO, chief of news bureau, head of a labor union, to rank-and-file reporter, and others.

The base of their perception that the government exerted 'control' over the press—as revealed in the interviews below—originated in their direct or indirect experiences. That is to say, those who have experienced disadvantages or received disciplinary actions due to 'something the government exerted', or journalists who had witnessed their colleagues undergoing such things perceived the 'something' as control:

- South Korean interviewee No. 3: was dismissed due to the involvement of the proxy in case 3-1;
- South Korean interviewee No. 4: is a party to case 4-1, resigned;
- South Korean interviewee No. 5: is a party to case 5-4, was demoted after receiving disciplinary actions;
- South Korean interviewee No. 6: was demoted through disciplinary actions taken by the proxy in case 3-4;
- South Korean interviewee No. 7: has covered affairs concerning government influence over the press for a long period of time;
- South Korean interviewee No. 8: has presented measures to block political pressure/control over the press.

"In particular, the Blue House (President) has absolutely the right to decide on appointing the CEO of a public broadcaster. So, they get the upper hand of the public broadcaster. What they request us to do is different from what we usually request when we are on an equal footing with each other. That is such a request that forces something to do and cannot help but put a lot of pressure on me. (Then, how did you feel it?) It couldn't be a simple request. I felt it as pressure at that time."

- South Korean interviewee No. 3

"It is clear that the press had been constantly under control during the time (2008-2017) when conservative power was in power. I view that there is a difference between regulating the press and controlling the press. In that sense, policies on the press under the conservative regimes in the past decade focused on press control thoroughly. So as to undermine the unfriendly press and encourage the friendly press."

- South Korean interviewee No. 8

The other journalist (South Korean interviewee No. 2) viewed the relations between the government and the press as a cooperative relationship and took up the position that the government had an 'influence' on the press out of necessity in the communication process between the two parties. He served as the CEO in both private newspaper and TV, and he did not have the feeling that he had been harmed by the 'government influence' he perceived.

“You may consider it as ‘press control’. However, the press is also the “fourth estate” that leads a country, so it has no choice but to communicate with the government all the time. Since the media has no choice but to communicate with the government, the National Assembly and corporations, the communication itself should not be viewed as pressure. It is inevitable to keep talking with them.”

- South Korean interviewee No. 2

On the other hand, a former high-ranking government official, South Korean interviewee No. 1, said that during the regime he had worked for, “The government did not control the press, but it merely asked the press for cooperation in reporting”. It can be said that this is a response or refutation to the perception of many other journalists, or ‘the government control over the press’. While he agreed with South Korean interviewee No. 2 regarding the relations between the government and the press, he took the opposite stance to that of many journalists.

“Whether it is private or public media, everything is done by request, not control. In the evening, just after the deadline for journalists’ article writing, the Presidential Senior Secretary for public information, the Spokesperson and secretaries monitor news and articles reported by each media company. At that moment, they request a favor of the heads of reporting and editing. (So, they generally made a call whenever a big political issue arose?) They did every day. Every day. They commented on news and articles like this, ‘This report has something wrong and it seems that your news bureau is misguiding a discourse on issues now. In other words, the direction of reporting needs to be modified’. (As you mentioned earlier, what they did is a request?) Yes, it was a request.”

- South Korean interviewee No. 1

Perception of something the S. Korean government has exerted on the press (which took power in 2008-2017 as the period relevant to the collected cases)	Total (8)	Former or current journalists from public media (4)	Former or current journalists from private media (3)	A former high-ranking official from the central government (1)
“The government did not control the press and merely asked it to cooperate in reporting. Everything is done by request , not control.”	1			K1
“The government had an influence on the press.”	1		K2	
“The government exerted control over the press.”	6	K3, K4, K5, K6	K7, K8	

Figure 29 South Korean interviewees’ perceptions of ‘something’ their government exerted on the press

5.1.2 German Interviewees’ Perceptions

<Figure 30> reveals that 6 out of 7 German journalists answered that their government had ‘influence’ on the press at the times related to the collected cases. Such perception was confirmed by the journalists who are (or have been) engaged in public or private media. Furthermore, each of their careers or positions vary from head of a local journalists association, foreign correspondent, editor, freelance (fest-frei) reporter, to media critic, and others.

The base of their perception that the government had ‘influence’ on the press—as revealed in the interviews below—originated in the following premise: ‘Since power in Germany, a federal state, is decentralized and there is no control system, press control itself is impossible.’ In other words, they stated that bringing up the term

'control' itself is inappropriate since there are no conditions and systems necessary for it to be described as press control, and therefore it is right to perceive it as the government's 'influence' which is a macroscopic concept.

Here, the 'system' stated by German journalists means media control systems that had existed in the times of Nazi Germany and former Eastern Germany. Those refer to the Reich Ministry of Public Enlightenment and Propaganda (Reichsministerium für Volksaufklärung und Propaganda), which thoroughly monitored and controlled the mass media, led by Joseph Goebbels (1933-1945), who was Adolf Hitler's right-hand man and was responsible for Nazi propaganda and glamorization, and the 'Stasi (Staatssicherheitsdienst)', the State Security Service of the German Democratic Republic (1949-1990) that surveilled, arrested and collected information on anti-governmental journalists and academic research groups, etc. to maintain the state system (Irving, 1996, pp. 161, 170; Gieseke, 2014, pp. 13, 43).

"Controlling, in my opinion and as most of colleagues probably understand it, is something that has a system behind. I can't see this system. There is no. In my opinion, it is influence or there are attempts of influence, but this is not control. We can't use 'press control' for the influence we're experiencing right now because this would relegate the real press control we experienced during GDR and Third Reich times. This is why I refuse to speak about press control in Germany. ... The expression 'control' is right for the time of GDR and is right for the time during the Second World War and Drittes Reich, because it was systematic. But nowadays it is not. There is no system."

- German interviewee No. 4

"Federalism is a strong factor in Germany, with very different governments in the federal states. But they are the ones who have the influence on legislation media, especially on PSM but also on the private ones."

- German interviewee No. 3

One journalist (German interviewee No. 2) who had served as the editor-in-chief of a public broadcaster for several decades showed some difference in perception by saying that the influence on the press was partly exerted by the state government, not the federal government. He took case 3-1 as an example and explained that Ulrich Wilhelm, spokesperson for the Federal Government, was elected as the director general (Intendant) of public broadcaster BR in 2010 due to the state government's influence because he had a lot of connections to Bavaria (Bayern) as he had served as a Bavarian state official in the past.

"Usually if you look at directors, intendants, CEOs or editor-in-chiefs of regional stations of ARD, you find that they are politically closer to the state government. So, partly I agree. But the mechanism is not the same as what you think of the Central Government's influence. It's a more regional influence. There is no centralism."

- German interviewee No. 2

The other journalist (German interviewee No. 8) said the German government exerted 'control' over the press, taking a vastly different stance from other journalists. He is the only German journalist who gave a positive answer to the question, "Have you ever experienced government control over the press?"—that is, the influence exerted by the government in a 'direct way', such as the disadvantages given to those who did not follow the instructions, including instructions to fulfill pro-government reporting. He, who had been working for many years for a public broadcaster as a freelance (fest-frei) reporter, had unintentionally disclosed the existence of government-biased unofficial news guidelines (unspoken rules) within the public broadcaster, was then removed from duties for over a year, and eventually had to leave the broadcaster—a party to German case 1-4.

"(Is there the press guideline within public televisions?) There is no. That would not be right to say that. We are democracy in Germany. The press guideline from the government is not direct but indirect. That's what happened to me at WDR. ... It's absolutely not a document and it's absolutely not rules. It is really by word or deed. (Invisibly?) Yes. Absolutely invisible. It (press guideline) does not exist in document form. (Do press guidelines include the disciplinary actions to violation?) No. But if you do the job in the way they want to do it, you get a promotion. If you don't do that, absolutely you do not get any promotion."

- German interviewee No. 8

On the other hand, a high-ranking official from the federal government, German interviewee No. 1, showed a different perception than other journalists—although it is a theoretical stance—by answering “The federal government protects freedom of the press”. His answer is characterized by explaining the relations between the federal government that he is engaged in—separately from the state government—and the press.

“Artikel 5 des Grundgesetzes schützt die Presse- und Meinungsfreiheit in besonderer Weise. Die Pressefreiheit ist ein fester Pfeiler unserer Demokratie. Schon allein die grundgesetzliche Verankerung der freien Presse in Deutschland verbietet die Einflussnahme auf Journalistinnen und Journalisten und deren Berichterstattung durch staatliche Stellen. Die von Ihnen ausgewählten Sachverhalte eins (,ZDF/Brender‘, case 2-1) und zwei (,Niedersachsen/Pistorius‘, case 1-10) kann ich nicht bewerten. Sie betreffen Aufgabenbereiche der Landesverwaltung, zu denen die Bundesregierung auf Grund der föderalen Staatsstruktur keine Stellung nimmt.”

- German interviewee No. 1

Perception of something the German government has exerted on the press (which took power in 2000-2018 as the period relevant to the collected cases)	Total (8)	Former or current journalists from public media (4)	Former or current journalists from private media (3)	A current high-ranking official from the federal government (1)
“The federal government does not control the press and protects press freedom under the Basic Law.”	1			G1
“The government had an influence on the press partly and limitedly .”	1	G2		
“The government had an influence on the press.”	5	G3, G4	G5, G6, G7	
“The government exerted control over the press.”	1	G8		

Figure 30 German interviewees’ perceptions of ‘something’ their government exerted on the press

5.1.3 Comparison of Perceptions by Interviewees from both Countries

First of all, both in South Korea and Germany, there is a clear difference in perception between former/current high-ranking government officials who can represent the stance of the government on ‘something’ it exerted on the press, and journalists who can represent the press that is an object of the ‘something’. This can be seen as a result of the diverse relations between the government and the press and the difference in position of each side.

The most noteworthy part and as well as the common feature is that the perceptions of the journalists of each country converged to one side despite some different perceptions. That is, in South Korea, many journalists took a stand that “The government exerted control over the press” whereas in Germany, “The government had an influence on the press”. This demonstrates that the journalists of each country have shared the concepts of the two terms, ‘control’ and ‘influence’ under an implicit agreement—even though the researcher did not explain the concept of each term. Furthermore, they recognized the intensity of the ‘control’ and ‘influence’, which are the ‘something’ the government exerted on the press, by comparing and distinguishing the two as follows: Control > Influence. It is evident in the interviews with some journalists who showed differences in perception.

Meanwhile, the criteria in selecting particular terms to externalize the perceptions—which were consistent among journalists from the same country—differed between countries:

- The base of many South Korean journalists' perception that 'something their government exerted' was 'control' commonly originated in the disadvantages or disciplinary actions that they have directly or indirectly experienced. It is quite likely that the negative/pessimistic perceptions which originated in their experiences caused their selection of the term 'control', which is more intense than the term 'influence'. (This interpretation also applies to German interviewee No. 8);
- Many German journalists commonly defined 'something their government exerted' as 'influence', stating the reason that 'control' itself is impossible since the system for press control does not exist in Germany. In other words, the German journalists, after tackling the conditions and situations, tended to use the term 'control' exactly or narrowly, and chose to use the term 'influence' which is a macroscopic concept, instead of 'control'.

Thus, in order to determine whether their governments exerted 'control' or not, the South Korean journalists based their judgments on their direct or indirect experiences, while the German journalists based it on the existence of the system for press control. That is to say, there is a difference in understanding of the concept of the term 'control' between South Korean and German journalists. This is similar to the aforementioned phenomenon in Part 2.3.2.3 where the term 'regulation' is interpreted and used differently in the US and Europe.

Considering that there exist differences in understanding of the term, an absolute comparison of the perceptions of each country's journalists on 'something' the governments exerted on the press is impracticable. The South Korean and German journalists' perceptions, that is, the perceptions of their media environment need to be interpreted relatively, taking account of the terms ('influence' or 'control') they selected to externalize their own perceptions as well as their understanding of the concept of the terms.

5.2 Perceptions of the Media Environment: Reasons/Backgrounds of Journalists' Perceptions that Their Government exerted 'Something' on the Press

The researcher identified the reasons/backgrounds of each country's journalists' perceptions of 'something' their government exerted on the press and why some perceptions make a difference. The analysis contents of each country are separated and organized as below.

5.2.1 In terms of the South Korean Media Environment

5.2.1.1 The Government's Hold over Public Broadcasters

5.2.1.1.1 Public Broadcasters' Governance

6 South Korean journalists who perceived that "The government exerted control over the press" commonly pointed out the governance structure of public broadcasters as the problem. For this matter, South Korean interviewee No. 2 who perceived that "The government had an influence on the press" shared the view as well. While comparing the situations of the private media that he was engaged in during the conservative regimes (2008-2017) and of public broadcasters, he used explicit expressions such as "Public broadcasters then were playing into the hands of the government" and "The government led public broadcasting by the nose".

As they point out, the President, the head of the South Korean government, legally has the de facto authority to appoint or dismiss the CEOs of public broadcasters. In accordance with the Broadcasting Act, the CEO of public broadcaster KBS is finally appointed by the President after the board of directors recommends a candidate for the CEO position. Then, the candidate goes through a confirmation hearing by the National Assembly. In accordance with the Foundation for Broadcast Culture Act, the CEO of another public broadcaster MBC is designated by the board of the FBC, which is MBC's major shareholder and supervisory body, and then is officially appointed by going through a general meeting of shareholders. However, the board members of the FBC are appointed by the Korea Communications Commission, and the Chairman for the KCC is appointed by the President—refer to cases 3-3 and 3-4 in the table below <Figure 25>.

"Currently, the Foundation for Broadcast Culture (MBC's major shareholder and board of directors) is actually a product of the '1987 regime'. The 1987 regime was, of course, a result which the citizens achieved against the autocratic government but was also a system set up so that the then ruling and opposing parties could take their shares amicably. So, for a long time, all director positions of the FBC board as well as the KBS board have been allocated to be acceptable to the ruling and opposing parties. And the rule for allocation was very authoritarian. Political power is considered one of the objects of surveillance and criticism by the public broadcaster, and yet the ruling and opposing parties are politically controlling the boards of the public broadcasters in this way, which means that political power practically chooses the CEOs of the public broadcasters. The fact that such the rule/system was designed in the first place seems to be a serious defect in itself. The fact that we're leaving a door open for political forces to intervene in public broadcasters is a serious defect in itself. (So, to be more specific about the 'political forces'?) I mean the ruling party and opposing parties, that is, the National Assembly, and the Blue House (President)."

- South Korean interviewee No. 5

"(When the government controls media, why do you think public broadcasters are the main targets?) That's because the government takes media companies whose CEOs' appointment it can influence on. Public or semi-public media companies: KBS, MBC, YTN, Yonhap News (news agency) and Seoul Shinmun (daily newspaper). So, five press companies. (That is because the government has shares in them?) Yes, that's right. Because the government has ownership."

- South Korean interviewee No. 3

In the case of semi-public broadcaster YTN, government-affiliated public enterprises are its major shareholders, and YTN's CEO is appointed by the board members who are appointed by the public enterprises. As the government holds major stakes in the public enterprises, they cannot be free from the government's influence, and thus the government (President) intentions have been conventionally reflected in the appointment of the CEOs

of YTN. In addition, the South Korean government owns shares in key national news agency Yonhap News and daily newspaper Seoul Shinmun.

South Korean interviewee No. 1, a former high-ranking government official who can represent the stance of the government, did not deny that the government exerted its influence on the media companies in which it held stakes and had the upper hand in the governance structure.

“Most fundamentally, the government can, so-called, ‘control’ press companies in which it holds stakes, but the government cannot compulsorily impose its position on private media or press companies which are said to be public media but whose shares are completely owned by third parties. Therefore, even at the time when I worked in the Blue House, when we wanted that ‘negative issues concerning the President’ not to be reported, we had to ask this as a favor to the media with which we had formed an intimate relationship.”

- South Korean interviewee No. 1

The cases directly related to such governance structure of public broadcasters are cases 3-2, 3-3 and 3-4, and those caused by the aftermath of the governance structure are cases 3-1, 4-2, 5-1, 5-2, 5-5 and 5-6. This explains why the main targets on which the South Korean government exerted its influence were public broadcasters as shown in <Figure 23>—15 out of 20 cases (including 3 semi-public broadcaster cases) correspond to this.

5.2.1.1.2 Interference in Reporting and Personnel Appointments through ‘Proxy Way’

Under the governance structure of public broadcasters, it is legally allowed that the government (President) appoints pro-government figures or the President’s closest associates as the CEOs or the members of the board of directors of public broadcasters. Two journalists, South Korean interviewees No. 3 and 4, said based on their own experiences that the government exerted strong control over even the inside of the public broadcasters through such CEOs or board members—i.e. through ‘proxy way’. Specifically, they pointed out the government’s interference in reporting and intervention in personnel management as serious problems.

“I personally experienced dismissal as KBS’s CEO. (On 12 May 2008) Chairman of the Korean Communications Commission, Choi See-joong met with Kim Geum-soo, Chairman of the KBS board, and his first words were, ‘Because of CEO Jung Yun-joo as well as KBS, the President is not governing the country easily’ and then he also said, ‘Get him to step down from the CEO position by any means’. After that, the KBS board of directors decided on my dismissal and requested the President to approve it. As a result, the President dismissed me in accordance with the Broadcasting Act.”

- South Korean interviewee No. 3

“Basically, public broadcaster KBS’s CEO takes a pro-government stance because the Blue House (President) has the power over his reappointment. And the CEO has the authority over personnel affairs for all employees in KBS. So, this governance structure of KBS has no choice but to influence its reporting. Under the circumstance that the CEO takes a pro-government stance, if his reporters take an anti-government stance and report news in that way, the CEO will see the relevant reporters unfavorably, right? Then, they eventually face a lot of disadvantages within their company.”

- South Korean interviewee No. 4

According to the interview with South Korean interviewee No. 4, the governance structure of public broadcasters not only caused interference in reporting and intervention in personnel management, but also even the self-censorship of the members (journalists) who wished to avoid disadvantages of personnel management. As for the ‘disadvantages of personnel management,’ there are official and unofficial ones:

- Official disadvantages are disciplinary actions, such as dismissal, suspension, salary reduction and demotion—refer to <Figure 21>;
- With regard to unofficial disadvantages, they are difficult to complain to the management because they are not explicit disciplinary measures; however, they can emasculate the journalistic principles/convictions of journalists. According to South Korean interviewees No. 5 and 6, the most representative forms of unofficial disciplinary actions are depriving members of opportunities for overseas dispatch (correspondent) or overseas training, and

not making appointments to key posts or news beats—it is virtually a demotion to an inferior post. It is described in more detail in Part 5.2.1.3.1.

In other words, public broadcasters' governance structure encourages the government to execute control in the 'proxy way'. From the perspective of the government (President), control by proxy is advantageous in that there are no legal constraints in appointing public broadcasters' CEOs, that after the appointment, in-depth control only an insider of a media company can carry out is possible through the proxy (CEO), and that even if the proxy (CEO) causes a problem, the government can avoid taking responsibilities through 'drawing the line' or 'cutting the tail off' by arguing that it was the result of the proxy's independent judgement and decision-making.

Former high-ranking official, South Korean interviewee No. 1, admitted that the government (President) implicitly demanded or expected reports favorable to the government through public broadcasters' CEOs—that is, in the 'proxy way'.

“Whenever a regime is born, there is, what you would call, a ‘Group of Heads’ to maintain the regime. The heads of media companies are included in that group as long as they agree with the then regime’s political ideology. For example, to be a CEO of KBS, you need to have approval from the President. A figure, who is designated as CEO, has no choice but to be aware of the President’s will or intention, ‘You know what I want, right?’ and then he takes office as CEO of a public broadcaster. Thus, this person will go into the position after reading the mind of the powerful. Only when the CEOs of media companies are changed at the beginning of a regime, to figures who are closely associated with the regime, the government thinks that the so-called ‘Line-up’ of overall media companies is built.”

- South Korean interviewee No. 1

5.2.1.1.3 Limitations of Governance Reform (Reform Irony)

As above, South Korean press circles, which recognized that the independence, autonomy, and fairness of public broadcasting have been violated due to the governance structure, have long argued for the need to reform the governance structure of public broadcasters.

Based on this awareness of the problem, South Korean public broadcasters and semi-public broadcasters voluntarily practiced improvement efforts. For instance, they aimed to block the direct/indirect intervention of the government (President) in the appointment of public broadcasters' CEOs following political clientelism⁸⁰, and after the regime change, the procedures for appointment/dismissal of the CEOs of public broadcasters in South Korea have changed from a closed to an open form (with the participation of citizens). In December 2017, the board of directors in public broadcaster MBC guaranteed the participation of viewers by disclosing the whole CEO selection procedure, from recruitment notice for candidates to their policy presentation and final interviews. Similarly, in February 2018, the board of public broadcaster KBS selected the CEO in a 'citizen participatory' manner, by reflecting a citizen advisory group's (142 people) assessment results of the policy presentation by CEO candidates as 40% of the final evaluation. The board of Yonhap News Agency, a key national news agency that annually receives a grant of more than 25.6 million dollars from the government, made public the CEO candidates' policy presentation held in March 2018, and therefore gave citizens the opportunity to ask questions. In particular, in May 2018, the labor union of semi-public news channel YTN carried out an interim evaluation vote of no-confidence in the CEO, who had been in constant controversy in terms of journalistic principles/convictions and ethics, and it led to the CEO's resignation based on the result of 'a majority voted for no-confidence (55.6%)'.

These procedures and results were all achieved on the basis of labor-management agreements. However, the limitation is that if the management abrogates the collective agreement, it can be controlled again by the executives. South Korean interviewee No. 5, who has served as the head of the labor union in public broadcaster MBC, said that when the management unilaterally destroys provisions of the collective agreement which are made to prevent

⁸⁰ A system in which the powerful gives positions not based on ability or performance, but in return for loyalty. The powerful maintains its power on the strength of political support from the beneficiaries.

the management from changing contents of reports and programs as they have their own way, the only thing a labor union can do is to strike. In this sense, MBC labor union's 170-day strike in 2012 came about, he added.

As a fundamental solution, reform of the governance of public broadcasters, specifically the amendment of the Broadcasting Act⁸¹ that would change the appointment process for the CEOs of public broadcasters, is needed; however, the limitation is that such step requires the help (will) from the outside of press circles, not the inside, journalists argued.

“The political sphere has to participate as a member (to reform the governance of public broadcasters) and so, the system was totally solidified into a politics-driven way. The most serious problem is that we can't change the paradigm at all. It is true that political parties are a very important group in South Korean politics and society, but shouldn't we break from this paradigm that governs the entire (public broadcaster).”

- South Korean interviewee No. 7

“Under the current Broadcasting Act, there is an inherent limitation that these things such as the composition of the board of directors in a public broadcaster are bound to be influenced depending on the political landscape. Therefore, without changing the governance structure, the problem of broadcasting control cannot be resolved.”

- South Korean interviewee No. 8

In short, it is an ironic situation in which the public broadcasters, which are under the government's and political influence due to the governance structure, have to request (expect) them for reform in order to be free from it. What is worse, the governance structure of public broadcasters still subsists in its problematic state owing to the passive will and attitude of politicians who have the actual power to resolve the problem. Here is why many South Korean journalists perceived the situation as 'press control'.

5.2.1.2 The Government's Abuse of Power

5.2.1.2.1 Mobilization and Abuse of Government Agencies

Many South Korean journalists regarded the fact that their government mobilized government agencies to conduct surveillance on movements inside media, get involved in appointments of media executives and issue directives to make public broadcasting pro-government, as 'press control'.

The journalists responded to <Figure 25> which shows the organs or performers that got involved in the South Korean government's influence on the press; and the government organs they mainly mentioned were the presidential agencies such as the Presidential Executive Office (Blue House), National Intelligence Office, and Korea Communications Commission. In particular, they said that the Presidential Executive Office (Blue House) played the role of the so-called 'control tower' by using the National Intelligence Service to surveil media companies and journalists and come up with control plans.

⁸¹ Provisions of the Broadcasting Act that the need for amendment has been raised to

Chapter IV Korean Broadcasting System (KBS)

Article 46 (Establishment, Operation, etc. of Board of Directors)

(1) The System shall have a board of directors as the highest decision-making body for the management of the System in order to guarantee the independence and public nature of the System.

(2) The board of directors shall be comprised of eleven directors, including the Chairman of the board of directors.

(3) The directors shall be recommended by the Korea Communications Commission in consideration of their typicality of different fields, and appointed by the President.

Article 50 (Executives)

(2) The president shall be appointed by President upon a proposal by the board of directors. In such cases, the president shall undergo a personnel hearings conducted by the National Assembly.

URL: <https://law.go.kr/engLsSc.do?menuId=1&subMenuId=21&tabMenuId=117&query=%EB%B0%A9%EC%86%A1%EB%B2%95#>

“(Do you think that press control succeeded because powerful and influential agencies including ones directly under the President fulfilled orders?) Yes, of course. The agencies include the Prosecution, the Board of Audit and Inspection, the National Tax Service and the Korea Communications Commission. Well, they do all kinds of evil deeds. They are all government bodies that could affect and do harm to the destinies of our broadcasters directly. When I was KBS’s CEO in 2008, the government actually abused its agencies to harm us.”

- South Korean interviewee No. 3

“When the NIS reports surveillance contents on media companies to the Blue House, they don’t just report facts (data), but they are obligated to suggest provisional plans. So, when they report ‘the facts are so and so, and how KBS employees are dealing with these’, they write out countermeasures beneath each fact and circumstance in this manner ‘what needs to be done about this matter’. The Presidential Senior Secretary for public information in the Blue House only needs to make the final decision based on that data from the NIS.”

- South Korean interviewee No. 4

As shown above, South Korean interviewee No. 4 pointed the Presidential Senior Secretary for public information out as the key man leading ‘press control’. South Korean interviewee No. 1, a former high-ranking official who had worked under the Presidential Senior Secretary, admitted that the judgment of the journalist (No. 4) made sense.

According to South Korean interviewee No. 1, when the National Intelligence Service (NIS), directly subordinate to the President, collected and conveyed information on media companies, the Presidential Senior Secretary’s Office for public information formulated a master plan of ‘control’ on the basis of the information. In the case of general matters, the Presidential Senior Secretary decided on the final plan and instructed organs to execute the plan. In the case of exceptionally weighty matters such as the appointment of the CEOs of public broadcasters, the Presidential Senior Secretary inquired from the President who has the authority to appoint.

“(In terms of ‘press control’, a plan maker who formulates the master plan, and a commander who instructs to execute the plan finally. Who are they respectively?) All of that is the job of the Presidential Senior Secretary for public information. Throughout all the different governments in history, that has been carried out by the Presidential Senior Secretary for public information and the Spokesperson. (Then, does the Office of Presidential Senior Secretary for public information lay out a master plan?) Because of this, I think the National Intelligence Service has no choice but to be involved in press control. Since there are intelligence officers who surveil media companies, of course, related reports come out. It cannot be denied that the NIS has kept a close watch on media companies’ movements and reported them to the Blue House. What the NIS conveys is just information. Using it, the Office of Presidential Senior Secretary for public information makes a strategy. (And the Presidential Senior Secretary instructs organs to do something against the press?) That’s right. So, the media environment of the time is influenced depending on the character of the Presidential Senior Secretary for public information. (If so, doesn’t he ask the President?) No, he doesn’t report everything to the president one by one. But for example, the Presidential Senior Secretary would be able to give his opinion to the President, like ‘who would be best to be appointed as the CEO of a public broadcaster, or who do you recommend’. (Then, he asks the President only about the weighty matters?) Yes. For recommendation about CEO appointment or such things.”

- South Korean interviewee No. 1

Since the government organs and officials within the scope of the President’s direct influence were mobilized for press control, and the ‘press control’ was planned by the presidential secretaries whose role is to understand and fulfill the President’s philosophy and intention about government operation, it would be reasonable to view that the President stood at the center of ‘press control’ by the South Korean government. With this, it can be understood that executors getting involved in government influence in South Korea boil down to the keyword ‘President’, which is described in Part 4.1.6.

5.2.1.2.2 Surveillance on the Press by a National Intelligence Agency

As indicated by the interviews above, it was an open secret in South Korean press circles that NIS's intelligence officers frequently came in and out of media companies which they were in charge of, to surveil internal movements in media companies as well as political orientations and moves of the top-level executives. Therefore, this reality of the national intelligence agency's surveillance on media companies and reporters also affected South Korean journalists' perception that "the government exerted control over the press".

South Korean interviewee No. 3, a former CEO of public broadcaster KBS (04.2003 - 08.2008) who was removed six months after the inauguration of the Lee Myung-bak government (Feb. 2008), said he indirectly confirmed that the National Intelligence Service collected information on him through the inside of KBS and reported it to the Presidential Executive Office (Blue House) when he was serving as the CEO. He believed that the findings of the surveillance by the National Intelligence Service would have been used as the basis for the government (President) to dismiss him.

"(While you served as KBS's CEO, have you ever met NIS's intelligence officer?) I have never met them in person, but in my case, I have ever heard that a NIS report about me came out once. At the time I indirectly heard the report content, which was made with only opinions from the side of an extremely conservative labor union of KBS by the NIS intelligence officer. The report contained only the views of the union that was extremely critical of me, and the NIS forwarded the information report to the Blue House. I had heard such stories."

- South Korean interviewee No. 3

The results of NIS's surveillance were written up in the form of a report and they were conveyed to the center of power (Blue House). Knowing these facts, there was also a possibility that the top-level executives of media companies, particularly some CEOs of public broadcasters conversely may have used NIS's intelligence officers so that positive opinions on themselves were reported to the Blue House (President) that has the power over his reappointment.

"If the CEO is a person who is extremely vulnerable to power and has a subservient attitude to power, the intelligence officer would have free entrance to KBS. On the contrary, if the CEO is a strict person who is unconcerned about currying favor with the powerful, the intelligence officer would never dare to come near the CEO, and report instead to the NIS like this, 'the CEO is not really favorable to the regime'. Because the CEO is concerned that such a negative evaluation on himself would be reported, there will be CEOs who contact the intelligence officers on purpose and who welcome them and try to keep a good relationship."

- South Korean interviewee No. 4

While such media surveillance by the intelligence agency was regarded as an aspect of 'press control' by many journalists, South Korean interviewee No. 2, who alone perceived that "The government had an influence on the press", acknowledged the intelligence agency's media surveillance but did not make an issue of it.

He (No. 2) served as the CEO of a private newspaper and a private broadcaster (01.2012 - 02.2014) during the Lee Myung-bak and Park Geun-hye governments, and for him, the person who had the power of appointment was the owner of the media companies, not the President. Considering this, there is a possibility that he has a lower degree of awareness of the problem of the media surveillance and reporting to the Presidential Executive Office (Blue House) by the intelligence agency, compared to the former CEO of a public broadcaster, South Korean interviewee No. 3. Moreover, it is assumed that he did not take the surveillance on the press by the intelligence agency seriously since the private media he was engaged in had good relations with the then two conservative regimes. In this regard, it is described in more detail in Part 5.2.1.3.3-ii.

"(Were there NIS's intelligence officers who have come in and out of private media MBN or Maeil Business Newspaper where you served as the CEO?) Yes, there were. (Did you meet them often?) Occasionally, an intelligence officer requested a meeting and therefore I met him. At the time, he would propose issues or difficulties that my employees were unable to bring up directly, as if he was an employee of my company.

(Things like welfare?) Yes, for example, a welfare issue. But I have not met him often. The frequency has definitely decreased compared to the past.”

- South Korean interviewee No. 2

After all, on the grounds of criticisms such as problem-posing from press circles, evils, and violation of press freedom, in June 2017 just after the most recent regime change, the National Intelligence Service decided to abolish the domestic intelligence officer system, which gave intelligence officers access to major public and private organizations including media companies in the country.

5.2.1.2.3 Abuse of Regulation as a Means of Control

Many South Korean journalists said that their government intervened in reporting and personnel management of public broadcasters based on their governance structure. If that is the case, it is logical that the government could not exert an influence on the private media that it did not hold stakes in, as it did on public broadcasters.

South Korean interviewee No. 8, who is a reporter from a private broadcaster, claimed that the government could ‘control’ private media as well by abusing regulations. According to him, since there was no way for the South Korean government to directly exert an influence on private media—as it did on public broadcasters—it took advantage of regulations as an alternate means. The representative regulations that were abused are as follows:

- Re-licensing (re-approval) system for broadcasters;
- Broadcasting deliberation on various programs, news, etc.

“The government has too many means of control. For instance, in the case of broadcasters, the renewal of broadcasting-licenses must constantly be authorized by the government. Also, the cycle of evaluation for permission renewal of private broadcasters including SBS is too short. Thus, these leave lots of room for the authorities to constantly intervene. Besides, the de facto government agency (Korea Communications Standards Commission) makes a judgment on the appropriateness of broadcasting content. From the perspective of press freedom, is it right for a governmental authority to continually deliberate on broadcasting? All of the results to deliberate on broadcasting are reflected in the evaluation score for renewal/revocation of permission. After all, that acts as a control mechanism over reporting content. So, there is one aspect that the private broadcaster’s owner, who lacks a proper philosophy of journalism uses the media as a means to pursue his self-interest. Another aspect is that the government has already read the owner’s such mind and puts pressure like this, ‘OK, we will guarantee your self-interest. In return, you should broadcast programs and news articles favorable to us’. In this way, the government and private broadcasters’ owners are interconnected.”

- South Korean interviewee No. 8

South Korea’s broadcasting business operators, such as terrestrial broadcasting, comprehensive programming channels and news channels, are granted the renewal (re-approval) term of validity for broadcasting-licenses from minimum of 3 years to maximum of 5 years⁸², depending on the evaluation score by the Korea Communications Commission directly under the President. The KCC may revoke the renewal (re-approval) of broadcasting business operators and reduce its term of validity in accordance with the regulations⁸³. The examination results of

⁸² Enforcement Decree of the Broadcasting Act

Article 16 (Term of Validity of License and Approval)

(1) The term of validity of license and approval under Article 16 of the Act shall be five years.

URL: <https://law.go.kr/engLsSc.do?menuId=1&subMenuId=21&tabMenuId=117&query=%EB%B0%A9%EC%86%A1%EB%B2%95#>

⁸³ Broadcasting Act

Article 18 (Revocation of Licenses, Approval or Registration, etc.) (1) Where any of the following applies to a broadcasting business entity, a CATV relay broadcasting business entity, a CATV music broadcasting business entity, an electric sign board broadcasting business entity, or a signal transmission network business entity, the Minister of Science and ICT or the Korea Communications Commission may issue an order revoking a license, approval or registration, fully or partially suspending the relevant business, suspending advertisement, or reducing the period of validity of a license and approval granted under Article 16 within a specified period of up to six months, depending on the business affair under his/her jurisdiction.

URL: <https://law.go.kr/engLsSc.do?menuId=1&subMenuId=21&tabMenuId=117&query=%EB%B0%A9%EC%86%A1%EB%B2%95#>

the KCC determine whether to maintain or abolish the media companies, and since the examination is carried out every 3 to 5 years, the broadcasting business operators have been discontented with the fact that they have to walk on eggshells around the government throughout the term of validity for renewal (re-approval) of permission⁸⁴.

The Korea Communications Standards Commission that takes charge of broadcasting deliberation is operated as a private independent organization to maintain the independence of deliberation. However, the commission consists of a total of 9 members, with the president recommending 3 (including the chairperson) and the national assembly 6 (3 from the ruling party and 3 from the opposition party), and therefore the ratio of ruling to opposition parties is 6:3. Due to the biased composition ratio, there is an inherent possibility that decisions on sanctions could be made based on political judgments. In fact, on the pretext that public broadcaster MBC's current affairs program aired a report critical of the government's major policy in 2008, the Presidential Executive Office (Blue House) complained to the program's production staff, and then the Korea Communications Standards Commission decided for the first time after closed deliberation that the program should make an 'apology to viewers' for the broadcast content—refer to case 1-2 in <South Korean Cases' Integrated Datasheet>.

When the KCSC reports the deliberation results on the broadcasting content (decisions on sanctions), the Korea Communications Commission orders the broadcaster to fulfill the sanctions (administrative dispositions). However, the KCC is also politically biased in that it consists of a total of 5 members, with 3 from the ruling party and 2 from the opposition party—refer to case 3-1 at the chart below <Figure 25>. The deliberation results on the broadcasting content and the number of compliances with the sanctions are accumulated and reflected in the evaluation score for renewal (re-approval) of permission.

Besides, the South Korean government once pressured a media corporation through a special tax audit. When private newspaper Segye Ilbo reported a scandal involving the President in November 2014, President Park Geun-hye directly denounced the newspaper and urged the prosecution's investigation into it, and in two months, the National Tax Service conducted a special tax investigation against sister companies of the newspaper—refer to case 1-1 in <South Korean Cases' Integrated Datasheet>.

For private media corporations that seek profits as well as publicness through journalism, the KCC's examination results for renewal (re-approval) of permission, the KCSC's deliberation results on the broadcasting content, and the NTS's special tax investigation into their affiliates are all linked to profits. Thus, media corporation owners (major shareholders) have forced their journalists to carry out pro-government reporting in order to gain more profit-making opportunities and enjoy benefits for business promotion/expansion. It is the contention of South Korean interviewees No. 7 and 8, two journalists from private media, that journalists of the private media had no choice but to avoid reporting critical of the government and practice voluntary self-censorship in order not to fall into disfavor with the government and to maintain good relations with it at the same time.

“In the case of South Korean private media, especially, newspaper companies, the management is hand in glove with the owner, isn't it? For this reason, there is rarely a case that a conflict between executives and the owner arises. Executives don't stand up to the owner as well as not saying, 'this is wrong, I can't do this'. They would give heed to almost all requests for cooperation from the government in behalf of the owner. (If so, the reason why the facts of government control over private media are not exposed to the outside world is because of self-censorship by private media?) Because of self-censorship and also the fact that each journalist has cooperated voluntarily. Within private media, that's eventually because each journalist's future is guaranteed by the owner and each journalist can get a promotion depending on the owner's decision.”
- South Korean interviewee No. 7

⁸⁴ Some South Korean media scholars argued for the abolition of the permission (approval) system for broadcasting, saying “Under the authoritarian regime, the main methods of controlling the press were licensing system and censorship. Given the provisions of the Broadcasting Act on broadcast and reporting, our broadcasting environment remains still in the 1980s” (Jeong, 2020). Moreover, the permission (approval) term of validity for broadcasting-licenses in South Korea was increased from 3 years to 5 years in 2010; however, it is pointed out that the term of validity is still short compared to 10 years in the UK, 8 years in the US and 5 years in Germany and Japan.

This explains why journalists, not only from public broadcasters but also from private media, perceived that “The government exerted control over the press”, and why there are no cases in which the South Korean government only targeted private broadcasters in <Figure 23>.

5.2.1.3 Journalists Collaborating on the Government’s Intentions

5.2.1.3.1 Public Broadcasters: In-house Control and Unofficial Disciplinary Actions by Forces following the Government

As previously stated, South Korean journalists said that in the case of media companies such as public broadcasters whose shares were owned by the government, the government exerted an influence on them in the ‘proxy way’ by getting directly or indirectly involved in the CEOs’ appointment/dismissal. They argued that when such CEOs tried to execute ‘control’ within their media company, those who actually practiced ‘control’ were high-ranking and subordinate executives holding key posts in the company, and that many high-ranking and subordinate executives cooperated with the ‘control’ as followers of the government, and therefore ‘control by proxy (President-appointed CEO)’ was possible. In other words, in-house control by the forces following the government became another background of their perception that “The government exerted control over the press”.

South Korean interviewees No. 5 and 6 who work for public broadcaster MBC cited ‘Kim Jang-gyeom’ from case 5-6 as a typical figure. Kim Jang-gyeom who was appointed the Chief of the MBC news bureau in May 2013 just after the inauguration of the Park Geun-hye government and then became the CEO in less than four years after serving as the Executive director of the news division, and high-ranking executives like Kwon Jae-hong and Baek Jong-moon who were incorporated into the inner circle within MBC through promotions in the same period of time, issued in-house guidelines practically prohibiting reports critical of the Park Geun-hye government and forced subordinate journalists to follow them. Furthermore, they attempted to disrupt labor unions by taking heavy disciplinary actions against labor union members who stood up against pro-government reporting pushed by MBC’s executives.

South Korean interviewee No. 3, who served as the CEO of public broadcaster KBS, explained that the reason why high-ranking executives of public broadcasters became followers or sympathizers of the government lay in their ideological bias (partisanship) and the value system coinciding with the then conservative regime.

“There were sympathizers and even many collaborators who facilitated government control inside the company. The most representative figure is Ko Dae-young, a core member of the ‘meeting on Wednesday’⁸⁵, who became the CEO of KBS in the end after serving as the news bureau Chief and the news division Director. The reason why figures like him were placed in key posts in the company is that they acted as the most effective and useful supervisor (proxy) for the government. There was no need for the government to intervene because they each fulfilled their missions themselves. ... In conclusion, the forces following power inside KBS had the same values and interests as the then regime. (In one word, a group sharing a common destiny?) They and the government shared the same destiny. That’s right. Exactly.”

- South Korean interviewee No. 3

Meanwhile, South Korean interviewee No. 6 argued that the reason why journalists, who ought to surveil and criticize the government in accordance with journalism ethics, abandoned their own roles and duties and became even ‘collaborators (betrayers)’ cooperating in ‘government control’, lied in their selfish ambitions and the ‘cognitive capture’⁸⁶ phenomenon that dominated throughout the press circles at the time.

⁸⁵ The ‘meeting on Wednesday’, formed in the spring of 2008 just after the inauguration of the Lee Myung-bak government, was a private group consisting of KBS political journalists who led the dismissal of CEO Jung Yun-joo and sought to crown Kim In-kyu—who was a former board member of KBS and had served as the chief of broadcasting strategy during President Lee Myung-bak’s election campaign—as the new CEO. At the time, the leader of the ‘meeting on Wednesday’ was Lee Jung-bong, the Executive director of the news division, and Ko Dae-young, the general manager of reporting, was in charge of general affairs.

⁸⁶ Cognitive capture or Intellectual capture is a kind of dogma or an inattentional blindness phenomenon in which someone’s idea (consciousness) is obsessed with solidified social common notions and follows them unconsciously.

In other words, since the reality was that the government already had a strong grip on the press, and besides, since a journalist's political orientation was in line with the then government's political ideology, the journalist subconsciously has adapted himself to the reality and cooperates with 'government control' rather than resisting it. Furthermore, in order to justify actual action contradictory to journalism ethics or to achieve individual ambitions for success by taking advantage of 'government control' according to strategic judgment, the journalist executed in-house control within his media company more strongly and subtly. In that sense, 'government control' was further strengthened, whereas resistance to it weakened, South Korean interviewee No. 6 said.

"We have serious structural problems that people outside a media company don't know well. In terms of promotions, overseas training, selection of correspondents for overseas dispatch, and assignment to a position through personnel appointments, etc. They are necessary systems within a media company as long as they are carried out through fair and transparent procedures. As for them, it is hard to make a clear, objective, and quantitative evaluation forms and so it is likely that they are easily misused or manipulated by the person who holds power over personnel appointments in a media company. For instance, the person promotes journalists who submissively accept and fulfil his directives/orders and especially, systems selecting correspondents for overseas dispatch or objects of overseas training are frequently misused in this way. ... (So, are you saying that the high-ranking executives, who had the power to confer certain benefits, exploited these opportunities as baits to get subordinate journalists to follow their will, and that when such journalists were lined up like that, they themselves became routes to spread and fulfil directives/orders for control?) Yes. Outwardly, it seems to be so. Even though this can seem extremely psychological, it is a form of creating a sort of 'inner circle' by saying, 'You follow my intentions well, so I will take care of you going forward'. Once journalists get into this circle, they don't dare to get out."

- South Korean interviewee No. 5

"Giving a disadvantage in any evaluation like performance appraisal, not giving significant work, or assigning to a humble job where no one feels worthwhile. Also, by grouping journalists resisting internal control and demoting them from MBC headquarters to isolated branch offices, not allowing them to do coverage activities in fact. Those kinds of things happened through executives. (So, the management chased them out of the main department within the organization?) There were cases where staff members were relegated to other departments within the headquarters. That's because there are many other things like a sense of alienation that journalists feel when they are spatially pushed out of the headquarters."

- South Korean interviewee No. 6

So-called 'unofficial disciplinary actions' mentioned by the above two journalists are characterized by the fact that grounds required for the execution of such actions are verbally passed on, and hence, the whole picture is rarely revealed. So, it is impossible to pinpoint the final person in charge of them, and no one can be held accountable for them in the end. In addition, unofficial disciplinary actions have the merit that they are able to turn previously resistant forces into sympathizers/collaborators who facilitate 'control' within the company, and therefore, they slowly weaken its internal resistance to pro-government reporting. For these reasons, the two journalists explained that the executives enjoyed using 'unofficial disciplinary actions' for the purpose of in-house 'control'.

This gives some understanding of the reason why execution results by the executives inside media companies in <Figure 21> are more common than those by government bodies. In addition, considering the 'unofficial disciplinary actions' that are difficult to grasp, the actual execution results of the South Korean government's influence can be expected to be more than that.

5.2.1.3.2 Private Media: Top-level Executives scouted into the Government Serve as the Control Route

South Korean interviewees No. 7 and 8, who are engaged in private media, said that the South Korean government scouted the current top-level executives of major private media into the central position of power (Blue House) to take control of the private media in which it did not hold stakes. They also claimed that the government used the scouted top-level executives' personal relationships with senior executives of the media they used to belong to and their connections with press circles to directly or indirectly exerted an influence on the private media.

Consequently, the two journalists perceived that the government ‘controlled’ the private media by using the top-level executives of private media as a sort of route. This can be said to be a variant of the ‘proxy way’ in which the South Korean government had an influence on public broadcasters.

Corresponding to the content above, one of the typical figures is Lee Dong-kwan who was a journalist turned Presidential Spokesperson—refer to cases 4-3 and 4-4 in <South Korean Cases’ Integrated Datasheet>. Presidential Spokesperson Lee Dong-kwan, who had served as the head of the political desk and the editorial writer at a major conservative private newspaper (Dong-A Ilbo), directly called the editor-in-chief of a private newspaper (Kukmin Ilbo) that had been preparing to publish an article about his corruption in illegal purchase of a real estate, and requested the chief editor not to publish the article with putting forth a close relationship between the two. Also, Presidential Spokesperson Lee directly called the chief of the news bureau of a semi-public broadcaster (YTN) to complain about news content that satirized the government and demanded the chief to revise the content. Both correspond to ‘interference in reporting’ over the phone in person.

While partly agreeing with the claims by journalists from private media, former high-ranking government official, South Korean interviewee No. 1, took up the position that the government used the former top-level executives of private media as the ‘request’ route, not ‘control’ route.

“That’s right. Usually, when the Blue House picks the Presidential Senior Secretary for public information, it hires a journalist-turned-person. For the Presidential Senior Secretary for public information, there were many figures from major conservative private newspaper JoongAng Ilbo, like Kim Du-woo. Choe Guem-nak from private broadcaster SBS was hired to succeed Kim Du-woo. I worked under Presidential Senior Secretary Choe. In addition, Presidential Senior Secretary for political affairs Kim Hyo-jae came from major conservative private newspaper Chosun Ilbo. In this way, the hiring has been made. ... So, Presidential Senior Secretaries asked for a favor based on the relationship they built with private media companies. The secretaries couldn’t force them to do something without request. That’s because there is no means to exert an influence on private media.”

- South Korean interviewee No. 1

There is no reason for private media to be against the government (Blue House) trying to take their high-level executives. From the perspective of a private media owner (major shareholder), if a high-level executive of the media company moves into a central position of power, the owner also would have a route through which he can ask for favors based on the past relationship (intimacy) regarding businesses that are ongoing or in course of preparing. In short, interests between the government and private media owners coincide, and therefore, an ‘exchange of personnel’ smoothly proceeds, which is a give-and-take of journalists who would be exploited respectively as a route of control and of lobbying.

In fact, there was a case where a particular private media owner actively lobbied the government to ensure that his henchmen and high-level executives were appointed, hoping they would play a ‘Trojan horse’ role. That is revealed through the interviews of two journalists below.

“From the Lee Myung-bak government to the Park Geun-hye government, SBS was the private broadcaster that sent its figures (high-level executives) to the Blue House the most⁸⁷. And the high-level executives were appointed as Presidential Senior Secretaries, even the Chief Presidential Secretary. Because of them, there was a lot of ‘interference in reporting’ towards SBS. (Did the Presidential Senior Secretary from SBS call and pressure SBS?) Yes. That is the way it works. ... There was the doubt whether they were chosen 100% based on their capacity and whether they were appropriate for those positions. Later, the owner told me, “I sent staffs there, but they have been not much help.” (Do you mean that SBS owner Yoon Se-young had made a direct effort to place his own firm’s high-level executives to high-ranking positions at the Blue House?) Yes, that’s what I said earlier. In this way, the owner sends high-level executives, that is, his right-

⁸⁷ Six top-level executives from SBS had been scouted into the Presidential Executive Office (Blue House) during the Lee Myung-bak (2008-2013) and Park Geun-hye (2013-2017) governments and they were appointed to high-ranking positions corresponding to Presidential Senior Secretary.

hand men and they get into central positions of power. (Could I consider the owner saying like this? ‘You know what I want, right? Go and fulfil my will.’) Absolutely.”

- South Korean interviewee No. 8

“SBS owner Yoon Se-young actively helped this (ensuring that his high-level executives were scouted into key posts at the Blue House) happen. In that way, he sold off his right-hand men to the Blue House. A fair number of Presidential Spokespersons in the past were from SBS. He also sent his right-hand men into the Korea Communications Commission—which deliberates on media’s reporting and sanctions it. Mr. Yoon Se-young lobbied around in that way. Frankly speaking, I see that as ‘voluntary collaboration (subservience) to the government’. (Then, do you think that such a result was not because of the needs of the Blue House, but because of Mr. Yoo’s needs?) It was a mutual win-win for them both.”

- South Korean interviewee No. 2

As collusive ties between the government and media companies deepen based on the interests or the same political ideology, high-level executives of media companies would be deeply incorporated into the inner circle of power, and not only them but also their current fellow journalists who have relations with them would walk the path of ‘voluntary collaboration (subservience) to power’.

“If once the government brings in (scouts) a figure from a particular media company, it becomes easy to control that company by priority. Second, it is to take advantage of a sense of crisis that media companies instinctively feel. Even if just one of the major media companies refrains from criticizing the government, this has the mysterious effect of making the rest of the media not to criticize the government so harshly. For this reason, if the government places several figures from major media companies in positions as Presidential Spokesperson, Presidential Senior Secretary for public information, etc. then they would be of considerable utility for the government. So, private broadcaster SBS had a narrower scope to criticize the government than before, and also private newspaper Hankyoreh⁸⁸ had a narrower scope by this much. In this way, each media company had its limitations in criticizing the government.”

- South Korean interviewee No. 7

In this context, South Korean press circles have raised a problem with ‘acts of collaboration (subservience) to the government’ during the conservative regimes (2008-2017) by high-level executives from media outlets. In order to raise awareness about this issue just after the conservative regimes came to an end, the National Union of Media Workers announced the names and activities of over 100 high-level executives of major media outlets, who had sympathized with or collaborated in ‘government control’ directly or indirectly⁸⁹.

This—along with Part 5.2.1.2.3—gives some understanding of the reason why private media journalists perceived “The government exerted control over the press”, and why there are no cases in <Figure 23> in which the South Korean government has targeted only private broadcasters.

5.2.1.3.3 Collusive Ties between the Government and Media Companies (* Differences in the Stance among Journalists)

As previously described, South Korean journalists agreed that there were journalists in both public broadcasters and private media who collaborated with the government’s intentions, and that the government’s intentions were implemented through their collaboration.

All journalists acknowledged and agreed that the root cause was the ‘collusive ties’ between the government (leading members) and media companies (top-level executives), but some journalists (South Korean interviewee No. 2) took a different stance in defining the collusive ties between the two as a definite relationship. The

⁸⁸ The Hankyoreh is a leading progressive private newspaper in South Korea, established on 15 May 1988.

⁸⁹ Korea National Union of Korean Media Workers. (2017, Jun. 14). The 3rd announcement of the list of journalists who collaborated in governmental press control in order to end deep-rooted evils of press domination.

· A total of 101 journalists, including the 1st and 2nd announcement

URL: http://media.nodong.org/bbs/view.html?idxno=116695&sc_category=

journalists did not hold a different view on the two concepts, the government's hold over public broadcasters and the government's abuse of power; however, since they took a different stance in defining the collusive ties between the government and the press, one cannot argue that it has representativeness as one of the reasons/backgrounds of the journalists' perceptions.

However, it is necessary to identify how individual stances on the collusive ties between the government and the press led to the perception of 'something' the government exerted, and also to understand specifically how the stances of the journalists differed.

Above all, it has been confirmed that such differences in stance caused differences in perceptions among journalists whether something the government exerted on the press was 'influence' or 'control'. Therefore, in order to understand the background of the differences in perception among journalists, the individual stances on the collusive ties between the government and the press are described below.

i. Admitted, a Relationship in which the Government has the Upper Hand

Six journalists who perceived that "The government exerted control over the press" acknowledged the existence of collusive ties between the South Korean government (leading members) and media companies (top-level executives), but took up the position that the relationship between the two was not equal. They explained the relationship between the two parties in terms such as upper-lower, dominant-subordinate, subservience and government circles, and claimed based on their direct or indirect experiences that such collusive ties promoted or facilitated 'control' by the government.

In other words, media companies were bound to walk on eggshells around the government for their individual reasons and purposes—governance structure for public broadcasters, and pursuit of profits for private media—and thus, in South Korea, an unequal relationship between the government and media companies was established where the government had the upper hand.

South Korean interviewees No. 3 and 4 working or having worked in public broadcasters based their argument on the fact that the government (President) has the power to appoint the CEOs of public broadcasters and holds stakes in several media companies. This stemmed from the direct experiences of the two journalists.

"In particular, the Blue House (President) has absolutely the right to decide on appointing the CEO of a public broadcaster. So, they get the upper hand of the public broadcaster. What they request us to do is different from what we usually request when we are on an equal footing with each other. I felt it as pressure at that time."

- South Korean interviewee No. 3

"The government must have exerted its influence over media companies in which it has held somewhat stakes, that is, in the case where an upper-lower power relationship has been formed, even though they avoid saying so. (So, because the government has stakes, they would have called the media companies more easily to control them?) Absolutely, they would have called only the media companies they considered, 'You are our PR agency'. As for media companies of which the Government (President) has the power to appoint the CEOs, I believe they have made a call with thinking, 'We can exercise power over them' or 'We have the authority to control them'."

- South Korean interviewee No. 4

Other journalists from a public broadcaster cited the fact that public broadcasters are inherently under the political influence of the government and the ruling party, and that high-level executives, the followers of the government, exerted strong internal control over subordinate journalists. Especially, South Korean interviewee No. 6 provided such reasons based on his direct experiences.

"Political power is considered one of the objects of surveillance and criticism by public broadcasters, and yet the ruling and opposing parties are politically controlling the boards of the public broadcasters in this way,

which means that political power practically chooses the CEOs of the public broadcasters. The fact that such rule/system was designed in the first place seems to be a serious defect in itself.”

- South Korean interviewee No. 5

“When I was disadvantaged in personnel appointments, there were so many damages that I faced. In the end, I think the fear of disadvantage in personnel appointments was the main reason why journalists couldn't resist against internal control actively. Especially in the case of journalists working in public broadcasters, their fear was much severer.”

- South Korean interviewee No. 6

Private media journalists cited the fact that media corporation owners (major shareholders) have always given heed to the government that holds the right to renew the permission in order to obtain more profit-making opportunities and to enjoy benefits for business promotion/expansion, and that the owners and high-level executives have frequently issued instructions to avoid reports unfavorable to the government. South Korean interviewee No. 8 provided such reasons based on his direct experiences.

“Although private media companies in South Korea have their inherent character, all the owners of the private media have tried to only keep their vested rights and interests, and have shown little signs of working hard to protect the value of journalism. (So, what keyword would you use to summarize the relationship between South Korean private media and the government?) Obedience under the power, collusive ties, symbiosis. In this order. Since the struggle for democracy in June 1987, it has become a symbiotic relationship—especially between conservative governments and major private newspapers with conservative leanings. It seems like broadcasters are also alike. For private broadcasters, they formed collusive ties with the government under subservient attitudes and leanings towards government circles. And then they proceeded towards symbiosis.”

- South Korean interviewee No. 7

“As the sales of terrestrial broadcasters dropped sharply, we (SBS) wanted the government to permit commercial breaks (advertisements in the middle of a program) which could increase our advertising revenues. To ask the government for permission, we needed to avoid incurring the government's displeasure and therefore the SBS owner kept making demands like, ‘Don't write articles that go against the Blue House (President)’. Actually, the demands were deeply embedded in the mind of journalists within our news bureau. ... In many issues including the Four Major Rivers Restoration Project (2008-2012, President Lee Myung-bak had aggressively pushed ahead with it), the owner exploited SBS for the corporate profit of SBS's parent company, Taeyoung construction.”

- South Korean interviewee No. 8

ii. Admitted, a Mutually Cooperative Relationship

South Korean interviewee No. 2 who perceived alone that “The government had an influence on the press” acknowledged that public broadcasters were under the government's influence due to the governance structure, but he took up the position that at least private media, which he had been in, had an equal, cooperative relationship with the government.

The interviewee, who had served as the CEO of both a private newspaper and a private broadcaster, said although the private media's top-level executives instructed favorable reports on the government's major policies and projects due to collusive ties formed through private exchanges with leading members of the government, it was a kind of cooperation to help the success of the then regime which shared the same political ideology with them.

His stance is in line with that of South Korean interviewee No. 1, a former high-ranking government official who can represent the stance of the government.

“(If a media company's political orientation is in line with the regime's political ideology?) If so, the degree and atmosphere of cooperation with the government will be much greater. It can be said to cooperate while keeping the government in check to a certain extent. The Lee Myung-bak government had a good relationship with the press, and all media companies. President Lee himself made such an effort very much. To be honest,

we met frequently in the President's safe house and drank alcohol together there. (Were the owners and CEOs of private media companies invited there?) Yes, right. The President also attended. So, the more frequently you contact and meet somehow, the greater the possibilities of being cooperative.”

- South Korean interviewee No. 2

“They (Presidential Senior Secretary for public information, Spokesperson and secretaries) commented on news and articles like this, ‘This report has something wrong and it seems that your news bureau is misguiding a discourse on issues now. In other words, the direction of reporting needs to be modified’. (As you mentioned earlier, what they did is a request?) Yes, it was a request. (Has there ever been actually side effects due to requests?) No, there hasn't. ... When the government requests comprehensive cooperation, the contact points in the private media are the owner and the CEO. That is to ensure ‘please cooperate with the regime’. This still happens today. It cannot disappear from the overall system.”

- South Korean interviewee No. 1

South Korean interviewee No. 2 stated that the private media's owner, CEO and top-level executives used to have an unofficial and private drinking party with the President. And he acknowledged that as intimacy between the two sides grew through such meetings and exchanges, they were bound to lean towards the government sharing certain political ideologies with them. He also said from a macro perspective, “The press is the ‘fourth estate’ that leads a country, so it has no choice but to communicate with the government all the time”. In this sense, it may be viewed that he defended biased reporting in the collusive ties between the government and the private media by stressing that the government and the press should maintain communication based on cooperative relations from a macro perspective.

iii. Conclusion

<Figure 31> is a visible expression of how 7 South Korean journalists interviewed viewed the relations between their government and the press.

All 7 journalists acknowledged the existence of collusive ties between the government (leading members) and media companies (top-level executives), but they took different views in defining the collusive ties between the two as a definite relationship:

- 6 journalists who perceived that “The government exerted control over the press” took the position that their government colluded with media companies in a relationship in which the government had the upper hand. In particular, such stance stemmed from direct or indirect experiences of the journalists;

- The remaining one, South Korean interviewee No. 2 who perceived that “The government had an influence on the press”, said that at least private media, which he had been in, colluded with the government in an equal, cooperative relationship. The private media he used to belong to had maintained good relations with the then conservative regime, and he did not have the feeling that he had been harmed by the ‘government influence’ he perceived.

Thus, it can be inferred that the South Korean journalists may have different perceptions on ‘something’ their government exerted on the press depending on the stance on the relations between the government and the press, and vice versa. Moreover, the careers or personal experiences of individual journalists, or the governance structure of media companies they are or were engaged in could serve as the critical factors for such stances.

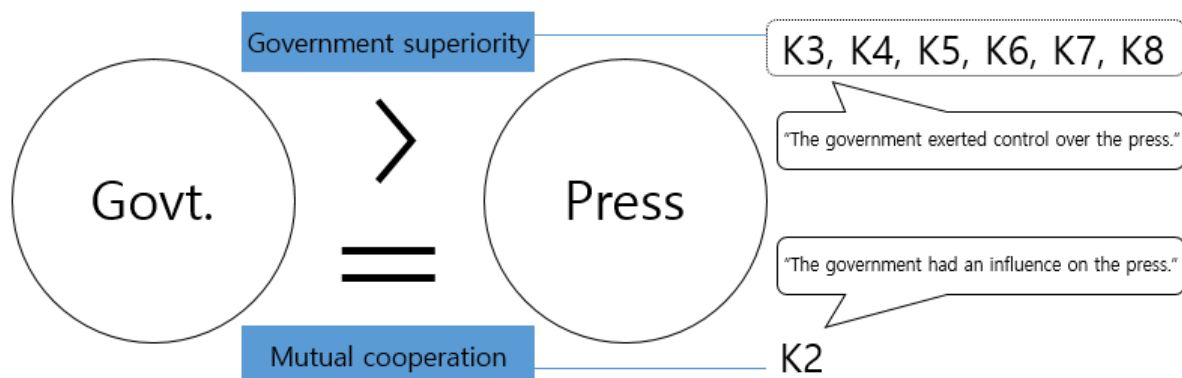


Figure 31 7 South Korean journalists' stances on the relations between their government and the press
(Comparison of influences)

Finally, based on 'relationships formed by mutual influences between the government and the press' described in Part 2.3.2.4.1, the relations between the government and the press that the South Korean journalists stated are defined:

- Indicated by 6 South Korean journalists who perceived that "The government exerted control over the press", the relationship between the South Korean government and the press corresponds to the 'loss of media autonomy (dominance of political power)' model. This model regards that the political system instruments the media, and so, the autonomy of the media is gradually lost. And this model appears mainly in societies where democratic systems were established but authoritarian regimes came into power;
- Indicated by South Korean interviewee No. 2 who perceived that "The government had an influence on the press.", the relationship between the South Korean government and the press corresponds to the 'interdependence' model. This model regards that the political system and the media system need each other in terms of function.

In conclusion, many South Korean journalists believed that the degree of 'media autonomy (Medienautonomie)' was low as their government exerted a lot of influence on the press. Also, it can be stated that they perceived that their government has treated the press with an authoritarian attitude.

5.2.2 In terms of the German Media Environment

5.2.2.1 The Government's Neoliberal Market Deregulation Policy

Rather than explicitly speaking of the reasons/backgrounds of their perceptions on 'something' their government exerted on the press, the German journalists mainly explained the backgrounds of being inevitably vulnerable to the 'something'. Hence, the researcher identified the reasons/backgrounds of their perceptions by analyzing the interviews with them, and the most frequently mentioned terms were 'media market concentration' and 'economization'.

All the journalists agreed that the media market was concentrated by a small number of media conglomerates, and that their pursuit of economization weakened the professionalism and journalistic principles/convictions of journalists, making the media companies and journalists more vulnerable to the internal and external influences compared to the past. Considering this stance alone, the 'media market concentration' corresponds to the cause, and 'being vulnerable to government influence' to the effect.

In this connection, two journalists, German interviewees No. 7 and 8, said 'media market concentration' stemmed from 'neoliberal deregulation'. In other words, the German government's neoliberal deregulation measures caused the media market concentration. Thus, the reasons/backgrounds of German journalists' perceptions are stated starting with the German government's neoliberal deregulation in accordance with the causal relationship.

5.2.2.1.1 Media Market Concentration

German interviewees No. 7 and 8 argued that after the end of the Cold War in the 1990s, some media conglomerates formed oligopoly aided by the government's neoliberal deregulation, and that the resulting media market concentration greatly influenced the jobs and journalistic principles/convictions of journalists.

At the global level, the political democratization and an increase in economic autonomy in the 1980s weakened the ideological foundation of 'big government' and provided justification for the change into 'small government', and this change was driven by the neoliberal ideology that emphasizes free competition and expansion of market functions. In the 1990s, the neoliberal flow spread throughout the world as well as the developed countries (Wang, 2008, p. 106-108). In Germany, as economic growth slowed down and the unemployment rate rose from the late 1980s, and as it faced massive financial burdens that have resulted from the reunification, the government cut back on social welfare expenditure and simultaneously deregulated the markets in line with the global neoliberalism flow (Eissel, & Ko, 2013).

The 'Neoliberalism' mentioned by the two journalists can be understood in three dimensions according to US political scientists Manfred B. Steger and Ravi K. Roy (2010, pp. 11, 14): an ideology, a mode of governance, and a policy package. Here, it can be seen that their argument focused on the government's neoliberal policy package. The neoliberal policy package has been realized with the following concrete set of public policies: deregulation of the economy, liberalization of trade and industry, and privatization of state-owned enterprises. Steger and Roy listed those (the so-called "codifiers of neoliberalism") who advocated and propped up neoliberalism in terms of ideology as follows: "global power elites that include managers and executives of large transnational corporations, corporate lobbyists, influential journalists and public-relations specialists, intellectuals writing for a large public audience, state bureaucrats, and politicians".

"In Germany, 11 concerns⁹⁰ rule the private press market (newspapers, print magazines and various online-sites). They together form a press oligopoly (few providers, uniform offer) and cooperate in printing,

⁹⁰ German interviewee No. 7 stated 11 major publishing concerns as below.

"These are the following persons: Friede Springer, Yvonne Bauer, Hubert Burda, the family Johannes Mohn and Liz Mohn (Bertelsmann, this includes the private TV channel, RTL Group and part of the „Spiegel“), Dieter Schaub (MedienUnion), Stefan von Holtzbrinck and Monika, Schoeller (Holtzbrinck Verlag), Dieter von Holtzbrinck (DvH Medien), the family Grotkamp, Stephan Holthoff-Pförtner and Renate Schubries (Funke), Dirk Ippen (Münchener Merkur), the family Neven DuMont and the family Christian Schütte (M. DuMont Schaubert) and Franziska Augstein (Spiegel-Group). In addition, very

distribution and marketing. One effect of this press oligopoly is: 99.5% of all daily newspapers sold on the kiosk are accounted for by only five publishing groups⁹¹. In other segments, the market shares of these eleven conglomerates are around 60%. So, this is less extreme, but it is still extreme as well. Nobody knows the exact numbers of the real press concentration in whole, because no supervisory authority measures the various forms (!) of concentration. Antitrust authorities ignore journalistic concentration and systematically underestimate economic concentration. Various forms of concentration are ignored. This situation is a consequence of the neoliberal deregulation beginning after the end of the Cold War in 1989/1990. Outside the private press oligopoly, there are few independent publishers or independent media left in Germany. At the beginning of the 21st Century, the press market was systematically bought up by the corporations. They destroyed the market for independent press, and journalism was rebuilt for economic purposes.”

- German interviewee No. 7

“The press landscape in Germany from the 1980s or 1990s until now has changed a lot. At the moment, we have only four big editors who bought everything. In the 1980s, you had hundreds of editors. My professor always said, “I’m very afraid that all editors are going to disappear and I’m sure they’re going to disappear. Very sad. We’ll have a situation in which only a few editors control the old market.” And that’s exactly the point where we are now. We have four editors who control more than 95% of the whole media market in Germany. That means we have these highly educated journalists who belong to the four editors and who are afraid to lose their job.”

- German interviewee No. 8

In regard to the media market concentration, the two German journalists argued that the poor labor market situation for journalists has reinforced the pressure for adjustment and self-censorship (adaptation) of the remaining journalists who still had a job. Moreover, German interviewee No. 8 was concerned that journalists’ professionalism (critical ability) and further press freedom have been under pressure due to the media market concentration.

The two German journalists’ claims and concerns were manifested in reality. According to UK media scholar Natalie Fenton (2011, p. 65), under the neoliberalism practices, the marketization of news deepened, and the ruthless logic of the economic system demanding ever-increasing profit margins resulted in fewer journalists doing more work, undermining the provision of news in the public interest. Furthermore, as the extension of the marketization of news into the digital age has happened, print media’s willingness to engage in ‘Churnalism’⁹² increased, which led to the disappearance of many local newspapers.

5.2.2.1.2 Pursuit of Economization by Media Conglomerates

Many of the German journalists pointed out that economization⁹³, which emerged with the media market concentration, increased the vulnerability of journalists and created the media environment where journalism was susceptible to influence.

influential is the publishing group Madsack. These so-called „media companies“ have the structure of conglomerates.”

⁹¹ Source: Röper, H. (2016). Zeitungsmarkt 2016: Pressekonzentration erneut leicht gestiegen, pp. 254-269 in *Media Perspektiven* 5/2016.

“Die Pressekonzentration in Deutschland hat wie in den Vorjahren leicht zugenommen – rund 60 Prozent der gesamten verkauften Auflage im Zeitungsmarkt stammen aus lediglich zehn großen Verlagsgruppen. ... Besonders deutlich zeigt sich die Konzentration des Zeitungsmarktes bei den Kaufzeitungen: Hier bleibt trotz sinkender Auflage der Bildzeitung die Axel Springer SE mit rund 79 Prozent Marktanteil auf dem ersten Rang vor DuMont, Ippen, der Morgenpost Sachsen und der Abendzeitung aus München. Diese fünf größten Verlagsgruppen sind für 99,5 Prozent des gesamten Kaufzeitungsmarktes verantwortlich.”

URL: <https://www.ard-werbung.de/media-perspektiven/fachzeitschrift/2016/artikel/zeitungsmarkt-2016-pressekonzentration-erneut-leicht-angestiegen/>

⁹² Churnalism refers to a process where journalists produce news based on pre-packaged press releases from government spin doctors, public relations consultants or news agencies without conducting independent research or even checking their facts (Thompson, 2019). Its purpose is to reduce cost by reducing original news-gathering and source-checking processes and to counter revenue lost with the rise of internet news and the decline in advertising.

⁹³ Saving or economic use of money, time, labor, etc.

Citing the aftermath of an affair related to dpa—refer to case 5-1 in <German Cases' Integrated Datasheet>—German interviewee No. 4 acknowledged that large print media have pursued economization like outsourcing and editorial cooperation in order to improve the declining profit structure, and thereby uncritically utilizing a news agency's articles, and that the consequent spread of distorted (government-biased) reports could be an aspect of German journalism's fading.

“Reports by news agencies maybe should be checked. Maybe this (German case 5-1) is a good example and proof of a decrease in quality in German journalism. But usually you don't have to double-check what is in there. So you may say that's an uncritical attitude. On the other hand, it has a financial context. If you double-check again, you need more resources, more human resources, more reporters. And please don't forget this financial aspect when you make your conclusion of how this article comes into so many newspapers. Maybe it's uncritical but maybe it has a financial aspect, too.”

- German interviewee No. 4

Other journalists, German interviewees No. 3 and 6, said that a handful of private media conglomerates have pursued the economization of media companies in their line to maximize their profits, and therefore many problems arose. Specifically, they mentioned the fading of characteristic professionalism of German journalists, the decline in credibility for the press, and the weakening of journalists' self-esteem.

“As for publishing companies, they are mainly interested in improving their profit, but do not want to invest in quality journalism any longer: I am afraid this is the trend.”

- German interviewee No. 6

“Economization is a big trend. And also here in Germany. If you check what publishing houses earn now, after the economic crisis in 2008, Bertelsmann has been assessed to have lost, I don't know, 50% of their own revenues and they have never come back. ... Now they (big publishing houses) have started to share and they don't have to spend time to do research. So, it is the follow-up of the missing revenues. And if you now check your regional newspapers, you see a lot of misspellings, you see a lot of really badly written articles and the style is going down. Besides these misspelling things, they did not do big researches or big-researched articles for publication anymore. You have more and more articles written without any names. It's from our agencies. That means that they all use the news agency distributed content, which of course is fine. But let's say the mainstream idea. We had this in connection to the *Lügenpresse* thing. We had the complaint that German journalism is all reporting on the same issues, in the same perspective, in the same content, asking the same questions. Just copy and pasting what news agency dpa is putting. This makes people as one. For these reasons, journalism lost some trust especially from 2014. In general, this hit on the pride of journalists in Germany.”

- German interviewee No. 3

As for the term '*Lügenpresse* (Lying Press)' mentioned by the journalist above, it first emerged to criticize the conservative press for reporting distorted facts in 1968, during the resistance movement (68er-Bewegung⁹⁴) against authoritarianism led by left-wing university students in West Germany. Afterwards, when the Berlin Wall fell in 1989 prior to the reunification of East and West Germany, journalists were accused of having acted as fawning sycophants to the Eastern German government, and hence they had a poor social reputation. It is also worth noting that when the refugee crisis (Flüchtlingskrise) arose in 2015, the term 'Lying press' re-emerged after a series of biased reports by major media companies. In this regard, German interviewee No. 4 said when even words referring to the press in Nazi Germany, such as 'System press (Systempresse)' and 'Synchronization (Gleichschaltung)' were in vogue among the public, following the reappearance of the term 'Lying press', journalists' self-confidence itself, and as well as social trust in journalism was lost.

Due to the press that has failed to fulfil its proper roles and duties at particular junctures like an enormous change or inflection point in the social flow, confidence in journalism has actually declined. According to a phone interview survey (CATI) on the credibility of media reporting carried out by German newspaper *Die Zeit* (2015)

⁹⁴ 68er-Bewegung (West German student movement or 1968 movement in West Germany)

in 2015, 6 out of every 10 respondents (60%) replied that they did not trust media reporting because of distorted and biased reporting, poor-quality covering, and lack of independence, and also, it showed that the media credibility with one-quarter of the respondents (28%) had declined in recent years⁹⁵.

After all, it can be said that changes in the governance structure of the German media market stemming from the German government's neoliberal market deregulation policy—that is to say, market concentration by a small number of private media conglomerates, destruction of the diversity of public opinion due to media's economization like outsourcing—have distorted the media labor market and weakened not only journalists' professionalism but also journalistic principles/convictions. Furthermore, the vicious cycle has been repeated as the decline in the credibility of the media led to a weakening of journalists' pride.

Therefore, German journalists were greatly concerned about the media environment, which has become vulnerable to internal and external influences from a structural aspect of the media industry, and they perceived that such media environment provided the foundation (background) for the government to easily exert an influence on the press.

“(I think that characteristic ‘Professionalism or Pride in one’s job’ of the German press has faded. And especially, the problem lies in a supervisor (chief editor) who is responsible for news reporting. What do you think of my analysis?) Ich stimme Ihrem Eindruck zu, dass die politischen Journalisten "Kreide gefressen" und zur Regierung Merkel über viele Jahre affirmativ berichtet haben. Ich vermute, es ist viel schlimmer: Die Journalisten verhielten sich konformistisch ohne Druck und ohne Not, quasi freiwillig. ... Die Journalisten müssen sich über ihre Situation selbst aufklären, sie ernst nehmen und das Problem öffentlich machen und viel mehr Widerstand zeigen.”

- German interviewee No. 5

The connection between ‘media market concentration’ and ‘oligopoly of a small number of media conglomerates’, and ‘the press’s vulnerability to government influence’ is specifically explained in the next part, ‘Neoliberal Network’.

5.2.2.1.3 Collusive Ties between Political and Media Powers: Neoliberal Network

According to German journalists, the keywords that explain the reasons why the media environment was vulnerable to government influence, such as ‘media market concentration’ and ‘oligopoly of a small number of media conglomerates’, are ‘neoliberal network’. It was formed by collusive ties between political and media powers, they argued.

The researcher asked German journalists about the alleged collusive ties between German government bodies (high-ranking officials) and conglomerates based on cases 1-8 and 4-2—refer to the table below <Figure 26>:

- Case 1-8: high-ranking officials of the Federal Ministry of Defence attempted to surveil particular journalists at the request of Heckler & Koch, a large private corporation supplying arms;
- Case 4-2: the Federal President directly called the CEO of private media conglomerate Axel Springer SE to demand non-reporting of an article unfavorable to him.

In this regard, journalists mentioned the seriousness of the problem. They claimed that in line with the current trend or flow of ‘Neoliberalism’, collusive ties between economic power (i.e. private conglomerates) and political power have spread throughout the industries and societies in Germany. And of course, this was also appearing in the media industry, they said.

⁹⁵ Source: Die Zeit. (2015, Jun. 24). Deutsche haben wenig Vertrauen in die Medien.

URL: <https://www.zeit.de/gesellschaft/2015-06/medienkritik-journalismus-vertrauen>

Umfrage zum Vertrauen in Medienberichterstattung. Computergestützte Telefoninterviews (CATI) vom 04.05.2015-06.05.2015 mit 1,000 Bundesdeutschen ab 18 Jahren, durch infratest dimap.

URL: <https://www.infratest-dimap.de/umfragen-analysen/bundesweit/umfragen/aktuell/wenig-vertrauen-in-medienberichterstattung>

“The neoliberal deregulation of markets led to wealth concentration and press concentration, and the effects are opinion concentration and power concentration. ... The media corporations have been driving neoliberal programs in editorial offices since the turn of the millennium, limiting alternative ways of thinking and playing their part in the job market. Through lobbying, they have also gained influence in the public service broadcasting system. Again, they have installed neoliberal thought patterns and embedded senior journalists in neoliberal networks. Eventually the Federal Government and media corporations operate equally the prevailing neoliberal policy programs.”

- German interviewee No. 7

According to the claim of the journalist above, private media conglomerates have been in charge of the realization of neoliberal policies promoted by the government as if they were part of the government despite not being government bodies, and they, as an economic power, have pursued the same goal—that is, the maintenance of a neoliberal system—on an equal footing with political power; thereby establishing an interdependent relationship with the government. Further, collusive ties between them and the government have formed for the concentration of wealth and of power.

German interviewee No. 3 concretely presented some figures who showed the collusive ties between political power and the media: Stephan Holthoff-Pförtner⁹⁶(CDU), a member of the Bundesrat for the state of Nordrhein-Westfalen and a large shareholder of the WAZ Media Group; Elmar Brok (CDU), a German member of the European Parliament (1980-2019) and the chief lobbyist for Bertelsmann for nearly 20 years (till 2014); Kai Diekmann, the editor-in-chief of Bild newspaper (2001-2015).

“If you go to a newspaper of a publisher, also his or her involvement in politics. Because, of course, we know that especially Friede Springer⁹⁷, Bild of Springer, she’s a big fan and friend to Angela Merkel. It’s known also that with Mathias Döpfner, the CEO of Springer, they have a connection. When Helmut Kohl died last year (June 2017), you had Bild-Zeitung, which is one of the most influential papers, at least the most influential tabloid. The former editor-in-chief of Bild, Kai Diekmann, he was making a home story of them. Helmut Kohl Chancellor, how he was, how they met themselves on the train, how they became friends and how everything worked out. And this former editor-in-chief of Bild-Zeitung was with the widow of Mister Kohl just after he passed away. So, this is what I call 'near', really near. He was the one in the house which had just the death of the Chancellor. So, this is also a connection to the private media.”

- German interviewee No. 3

As ‘oligopoly of a small number of media conglomerates’ was formed due to ‘media market concentration’, the government’s influence on the collusive ties between the political and media powers, that is, the so-called ‘Neoliberal Network’, was expected to be considerable. Many German journalists were gravely concerned about the situation.

“I am afraid that there are connections between politicians and media, which are way too close, it starts in small cities and goes up to the top of the government. I consider it as one of the main responsibilities of the media to observe, research and expose this, which I am afraid is not happening enough.”

- German interviewee No. 6

⁹⁶ Stephan Holthoff-Pförtner is a German lawyer, media entrepreneur, lobbyist, and politician (CDU). He is the foster son of the co-owner of WAZ, and also a shareholder and spokesperson for family-owned company FUNKE which took over the WAZ media group. The WAZ (Westdeutsche Allgemeine Zeitung) is the largest local daily newspaper in Germany, which is based in Essen, North Rhine-Westphalia state. Since June 30, 2017, he has served as the North Rhine-Westphalian Minister for Federal-, European-, International Affairs and Media in the Armin Laschet (CDU) cabinet; however, he was deprived of the authority for media because of possible conflicts of interest in August 2017.

⁹⁷ Friede Springer is a German publisher and the widow of Axel Springer who founded the Axel Springer SE in 1946. She is the main owner of the Axel Springer SE media conglomerate that is the largest publishing house in Europe, with numerous multimedia news brands, such as *Bild*, *Die Welt*, and *Fakt*.

MEEDIA. (2016, Sep. 2). Mehr als 27 Mrd. Euro Privatvermögen: Das sind die 30 reichsten Medienmenschen Deutschlands. URL:<https://meedia.de/2016/09/02/mehr-als-27-mrd-euro-privatvermoegen-das-sind-die-30-reichsten-medienmenschen-deutschlands/>

German interviewee No. 7, who has studied media market and governance in Germany, cited the ‘Tendency Protection Law (Tendenzschutz)⁹⁸’, which virtually recognizes the right to express political positions only for media owners (major shareholders), as a significant factor that allowed the two sides to form the collusive ties. The owner can appoint the publisher and CEO and convey their own will to the CEO and the editor-in-chief. He (No. 7) argued that—while business management and news reporting sections within a media company should be separated by a ‘firewall’ in principle—the owners of German private media conglomerates appointed CEOs and editors-in-chief who could contribute to the maximization of their profit, and in accordance with the will of the owners, they carried out news reporting in a way that the neoliberalism flow was maintained. In conclusion, he said that internal press freedom (Innere Pressefreiheit) has been disregarded. And he affirmed that there could be no German government’s control over media conglomerates but instead, there was only journalists’ self-censorship under pressure from the media conglomerates themselves. In fact, the case study of this study did not identify cases in which the German government exerted an influence as a pre-emptive/planned measure on media conglomerates in a ‘direct way’ such as surveillance of journalists and restriction on covering.

German interviewee No. 5, who had worked for more than 20 years in private media, also did not deny that private media owners could affect editors-in-chief and others under the Tendency Protection Law.

“(In Germany, does a Chief Editor have full authority in his media company’s news reporting section?) Im Prinzip ja - solange er seinen Medieneigentümer nicht schädigt oder ihn verärgert. (In German private televisions/newspapers, how are the Chief Editor and the CEO (Intendant) appointed, and by whom? For example, the board of directors or the owner?) Die Frage beantwortet sich durch das Eigentumsrecht und die Regelung für die sog. Tendenzbetriebe.”

- German interviewee No. 5

“One little known fact is: The so-called ‘Tendency Protection Law (Article 118 of the Works Constitution Act)’ restricts freedom of the press to freedom of publication. Maybe this sounds like a banality, but you have to understand the consequences of this law: it means, that on the market of the private press, journalists enjoy no freedom of the press, only a few rich publishers who own the corporations⁹⁹. This applies to all employed journalists and to all freelancers who work for the concerns. The political tendency of most publications is determined by the rich publishers according to their neoliberal attitude. These publishers are not interested in journalism at all, their only goal is to maximize their profit. This has dramatic effects on the content itself and of the possibilities of democratic opinion-formation. The tendency protection law also restricts the internal co-determination rights. ... Your work aims to examine five forms of state influence on the press. Of these five forms, I see only one form in Germany: This is self-censorship of journalists, expressed in government-friendly reporting or government-friendly program structures. The cause of this self-censorship,

⁹⁸ In Germany, the publisher’s right to determine political opinions/stances of his medium is recognized by the Works Constitution Act (Betriebsverfassungsgesetz).

Betriebsverfassungsgesetz (BetrVG) § 118 Geltung für Tendenzbetriebe und Religionsgemeinschaften

URL: <https://www.gesetze-im-internet.de/betrvg/BJNR000130972.html>

⁹⁹ In Germany, the concept of internal press freedom (Innere Pressefreiheit)—which is distinguished from press freedom from the outside (Äußere Pressefreiheit), stipulated in article 5 of the Basic Law (Grundgesetz)—exists along with the Tendency Protection Law (Tendenzschutz) that respects publicizing political opinions/stances of the publisher—in fact, the media owner. This is to prevent the supervisors such as publishers and editors-in-chief from unilaterally ordering subordinate journalists to write biased articles within their company. In other words, this is aimed at protecting the basic right for coverage, editing and reporting, the independence of individual media workers including low-level journalists and editors, and as well as chief editors, and offsetting the concentration of press power by enhancing internal pluralism (Initiative Tageszeitung e.V., n.d.). In short, based on the concept of internal press freedom, it means that minimum press freedom and independence are guaranteed for journalists working within the basic framework called the ‘tendency of reporting’ determined by the publisher/owner (Cho, 2007, pp. 254-255).

In light of this concept, the claim of German interviewee No. 7 excessively tends to give priority to the Tendency Protection Law related to the editorial right of the publisher (owner). However, his argument is meaningful up to a certain extent as it is seen as a dramatic emphasis on the significant diminishing or erosion of internal press freedom due to the publishers’ (owners’) encouragement of pro-government reporting to journalists amid the trend of neoliberalism.

however, is NOT governmental "control", but simply lies in the fact that government politicians and journalists are interdependent.”

- German interviewee No. 7

When focused on the word ‘interdependent’ mentioned by the journalist above—based on ‘relationships formed by mutual influences between the government and the press’ described in Part 2.3.2.4.1—the relationship between the German government (ruling party) and the press corresponds to the ‘symbiosis model’. In this model, the gap between the political system and the media system gradually narrows, and as a result of increasing mutual dependency, both systems lose their own autonomy, and therefore, policy-making is a product of cooperation (or division of task) by the interaction of the two systems.

As stated earlier, US political scientists Steger and Roy (2010, p. 11), who presented three dimensions to understand ‘neoliberalism’, included influential journalists, public-relations specialists, state bureaucrats and politicians as global power elites who advocated and propped up neoliberal ideology. US political sociologist Neil Brenner (2000, pp. 329, 338) explained that Germany in the 2000s, within an integrated European space-economy and amid intensified global economic competition, promoted reterritorialization and re-scaling of state power in a variety of national and regional contexts through neoliberal deregulation politics to strengthen its competitive advantage. He added that this implementation was especially facilitated by dominant political and economic actors and organizations that were the engine of national industrial growth and the natural basis for economic competitiveness.

This somewhat resolves some questions about the fact that there is no case in which the government has targeted only private broadcasters in <Figure 24> which shows targets of the German government’s influence.

5.2.2.2 Political Influence from the Inside/Outside over Public Broadcasters

5.2.2.2.1 Partisanship of the Supervisory Boards in Public Broadcasters

German journalists, who perceived that “The government had an influence on the press”, pointed to political influence on public broadcasting, especially partisanship within the supervisory boards, as that background.

The supervisory boards (Aufsichtsgremien) in public broadcasters refer to the board of directors (Verwaltungsrat) which oversees the budget execution of the broadcaster and has the authority to approve appointments of key executives in reporting and managing sections like the editor-in-chief, and the broadcasting board/council (Rundfunkrat/ZDF-Fernsehrat) which deliberates and advises on broadcasts, establishes guidelines for them, and moreover, has the power to select the director general (Intendant)¹⁰⁰.

To explain the background of partisanship within the supervisory boards, German interviewee No. 3 who is working for public broadcaster ZDF used the term “Freundeskreis (circle of friends)”. He explained that the supervisory boards (board of directors and broadcasting board) in German public broadcasters aim to ensure diversity by reflecting the voices of the society as a whole in their broadcasting; however, when it comes to making major decisions like election of the director general (Intendant), supervisory board members were divided into a few massive groups and each group made decisions based on its political judgment. That is to say, political power from the outside did not influence the board members, but rather, each massive group itself that the members belonged to made political judgments and decisions according to its own partisanship.

“Do you know, what is ‘Freundeskreis’ in the ZDF? The control bodies of ZDF are Fernsehrat and Verwaltungsrat. It’s hard to say that it’s a form of government control. Of course, it was the form of

¹⁰⁰ In this study, each of the terms below refers to:

- The supervisory boards refer to ‘Aufsichtsgremien’;
- The board of directors refers to ‘Verwaltungsrat’;
- The broadcasting board/council refers to ‘Rundfunkrat (ZDF-Fernsehrat)’.

government control with the Nikolaus Brender case. Even though you had this reform¹⁰¹ of the recruitment processes, the tasks and the number of people that are in these control bodies, you still have the Freundeskreise which are informal. ... As a control body, it (Rundfunkrat/Fernsehrat) is one of the highest institutions. ARD and ZDF whatever. We have to accept that. This is theoretically. Practically, you have this Freundeskreis, a circle of friends. You have one is black, you have one is red. Black is CDU. Red is SPD. If somebody comes from the gay association or some labor unions whatever, he is offered to join one of two circles. One of two circles means that you go to the black or you go to the red. Because if you stay alone, you are just working against one or two majorities, which meet four to five times a year. This control body is to make the decisions. The day before, the circle of friends meets and prepares what they're going to decide. These people, this Freundeskreis is normally executed by somebody who is in charge of the Freundeskreis and who organizes the words. So, you have an informal thing inside, so-called 'internal pluralistic body'. You can't say that this is a form of government control, but in an informal way, you have the possibility to control."

- German interviewee No. 3

German interviewee No. 3 cited 'Nikolaus Brender case (Fall Nikolaus Brender)' as a representative event that shows the partisanship of the 'Freundeskreis' within the supervisory boards in a public broadcaster—refer to case 2-1 in <German Cases' Integrated Datasheet>. In November 2009, board members, who were affiliated to the Union parties (CDU/CSU) within the board of directors (Verwaltungsrat) in public broadcaster ZDF, frustrated the term extension of Editor-in-Chief Brender by taking advantage of their superiority in numbers. According to Inga Wagner (2015, p. 179)¹⁰², who studied how profound an impact political influence could have on a public broadcaster, focusing on the Nikolaus Brender case, loyalty to certain individuals and/or groups was of great importance in the Brender case and it influenced the decision-making of the board members. And this requirement to behave accordingly was mentioned more frequently to board members from the black circle of friends (Räte aus dem schwarzen Freundeskreis). In addition, informal communication and exchange, especially among the black members (unter den schwarzen Räten) were deliberately conducted in order to tune on a common position for the deselection of Brender and the victory with the majority.

Right after the Brender affair, there was much criticism of the board members affiliated to the Union parties (CDU/CSU) who had practically exercised political tyranny on an 'uneven playing field' in their own favor, and moreover, German press circles brought up the issue of the supervisory boards' structure in public broadcasters being vulnerable to political power. Eventually, with the former ZDF Editor-in-Chief Brender affair as a momentum, it was decided by the German Federal Constitutional Court on March 25, 2014 that the number of members close to the government authorities—i.e. federal government, state governments, and subordinate/affiliated bodies—within the supervisory boards in public broadcasters must be restricted to one-third of the statutory members (Bundesverfassungsgericht, 2014).

The purpose of such reform was to reduce the degree of political (governmental) influence on public broadcasting; however, in fact, it clearly shows that it acknowledged the existence of political (governmental) influence over public broadcasters and that it still allowed some. In the interview with German interviewee No. 3 above, his claim that "Even though you had this reform, you still have the Freundeskreise which are informal" is also understood in this context.

When public broadcaster ZDF was established in 1961, the various party representatives who were appointed as members of the broadcasting board agreed that, by applying a system of party proportional representation, the

¹⁰¹ The legislation review decision was made by the constitutional court on March 25, 2014. The judgement stipulated:
2. As an expression of the principle of ensuring diversity, the organisation of public broadcasting must adhere to the principle of detachment from state authority (*Staatsferne*). Accordingly, the influence of the members who are part of state authority or close to it must be strictly limited.

c. The total share of members who are part of state authority or close to it may not exceed one-third of the statutory members of the respective body.

Bundesverfassungsgericht. (2014). Urteil des Ersten Senats vom 25. März 2014. See No. 2 in the Leitsätze (Headnote).

URL: https://www.bundesverfassungsgericht.de/SharedDocs/Entscheidungen/EN/2014/03/fs20140325_1bvf000111en.html

¹⁰² Inga Wagner had interviews with 10 out of the 14 members of the board of directors in ZDF at the time.

then ruling party CDU could appoint the Intendant and the Program Director, and in return, the Administrative Director's position was allotted to the FDP, and the Editor-in-Chief's position to a sympathizer of the SPD, though not a party member. Similar party proportionality was further applied to the management ranks, and so, even before the appointment of the Intendant, most of the high-level positions were determined by the party representatives. Party affiliations influenced appointments to most jobs including clerical, editorial, and foreign correspondent positions, and a good number of positions were filled by former press officers of the party organizations (Noam, 1991, pp. 81-82).

Dieter Stolte, who had served as the director general (Intendant) of ZDF for 20 years (1982-2002), admitted the partisanship of public broadcasting in his memoir called, 'Mein Leben mit dem ZDF'. He considered the opposing camp formation and the party proportional representation essential for the stability of ZDF and stated, "The Intendant and the Editor-in-Chief should be close to the CDU, the Program Director and the Administrative Director should be oriented to social democratic or liberal." In this regard, the German press pointed out that although there have been some reforms to the supervisory boards in public broadcasters, these practices and the exercise of political influence still exist today (Gäbler, 2016).

Similarly, German interviewee No. 5 said political influence over ARD and ZDF, Germany's two major public broadcasters, was still going on.

"1.) Es gibt insb. in Berlin subtile Formen, um Journalisten zu beeinflussen. 2.) Gegenüber Redakteuren des öff.-rechtlichen Rundfunks (ARD und ZDF) versuchten Politiker wiederholt, auf Themen und Sendungen Einfluss zu nehmen. Wie weit diese Versuche auch erfolgreich waren, kann ich nicht beurteilen. 3.) Zu den Mitteln der indirekten Einflussnahme auf ö-r. Programme gehört die Personalpolitik (politischer Proporz in den Leitungsgremien usw.). Ich empfehle Ihnen hierzu das Buch "Rettet die Wahrheit!" von Claus Kleber, seit vielen Jahren Moderator des "heute journals". Er verteidigt zwar den öffentlich-rechtlichen Rundfunk auch gegen Vorwürfe der Manipulation durch die Parteien. Doch deren Einfluss insb. auf die Personalpolitik muss er eingestehen."

- German interviewee No. 5

5.2.2.2 Close Affinity between Local Public Broadcasters and State Governments ('Staatsnah')

German interviewee No. 2, who had served as the editor-in-chief for 20 years at a German local public broadcaster, admitted that local public broadcasters generally have been influenced by the state government that has jurisdiction in the area. Referring to German case 3-1, he said that the election of Ulrich Wilhelm, the then Spokesperson for the federal government, as BR's director general (Intendant) by the broadcasting board in local public broadcaster BR in 2010 was the result of the influence of the state government in the area, not of the federal government or Federal Chancellor Merkel.

"In the case of Ulrich Wilhelm, it was not the Central Government but the Local Government maybe. There is a lot of influence from the Local Government in Bavaria on the Bavarian television and radio. The Central Government is not influencing, doesn't have any possibilities to have direct influence. (But a state government can?) They have more influence. Usually if you look at Directors, Intendants, CEOs or Editors-in-Chief of regional stations of ARD, you find that they are politically closer to the state government. ... He (Ulrich Wilhelm) had a lot of connections in Bavaria. I think he was in the bureaus when Edmund Stoiber was Prime Minister Bavaria (1993-2007). So he was very close to the Bavarian Government."

- German interviewee No. 2

There are 9 local public broadcasters (BR, HR, MDR, NDR, RB, RBB, SR, SWR, and WDR) operating throughout Germany, and they are regulated by each of the state media authorities (Landesmedienanstalten) in the area—not by the Interstate Broadcasting Treaty (Rundfunkstaatsvertrag or Medienstaatsvertrag) that is ratified by 16 federal states (Chang, 2019, p. 63). In this context, the argument of German interviewee No. 2 that the state government's influence is highly likely to be exerted on the local public broadcaster sounds valid.

In the case of German local public broadcasters NDR and WDR, members of the broadcasting board are appointed by the parliament of the state where each broadcaster is located, and each political party has the power to designate

the board members in proportion to the number of their parliamentary seats. In the case where a single political party leads the state government, the broadcasting board is usually dominated by the representatives that the political party appointed. This situation usually appears in HR (Hessischer Rundfunk) and RB (Radio Bremen) in the states where the SPD prevails and also in BR (Bayerischer Rundfunk), SDR (Süddeutscher Rundfunk), SR (Saarländischer Rundfunk), and SWR (Südwestrundfunk) located in the states where the CDU/CSU predominates. In most local public broadcasters, the Director General (Intendant) is the member of a particular political party, his deputy belongs to one of the others, and the Director General must obtain approval from the board of directors to appoint the Editor-in-Chief, Managing Director, and Technical Director, etc. who will work with him (Childs, & Johnson, 2014, p. 152).

Since appointments of key executives (e.g. Editor-in-Chief) in reporting and managing sections require approval from the supervisory boards being partisan, figures close to a particular political party—mainly the state’s ruling party—are likely to be elected or appointed. As a result, it can be said that local public broadcasters are vulnerable to the influence of the state government that has jurisdiction in the area.

Klaus von Bismarck, who had worked as the Director General (Intendant) of local public broadcaster WDR for 15 years (1961-1976), made the following remarks about the situation of public broadcasters which has not been free from the influence of political parties.

“I’ve come to realize that where the professional politicians [on the governing boards] are concerned the political party balance of power is in the final analysis decisive. To assume anything else would put idealistic gloss on the situation. What does this mean? ... A pressure of these parties, in practice above all of the party groups in the Land Diets on the members of the broadcasting bodies has grown in intensity ... As a result, the freedom of the majority of these members, who depend on party support, to take decisions that are in the best interests of broadcasting is strictly limited. [Grosser, 1979, p. 132].” (Noam, 1991, p. 82).

If partisanship still does exist within the organizations of local public broadcasters in Germany, it would be difficult to be free from the influence of state governments (the ruling party). German interviewee No. 8 was concerned about this based on his experience where the interviewer took a partisan stance when he visited local public broadcaster BR to look for a job in the past.

“It is clear that you do not report negatively about certain politicians in the region. So, if you have certain politicians, for example SPD, you do not report negatively about them. (Why?) Traditionally WDR is more SPD oriented. You cannot say that in public. They would say, “No. It's not true.” But it's like an unwritten law. Bayerischer Rundfunk is traditionally more CSU orientated. If you say that to somebody in Bavaria, they would deny it. They would always say, “It's not true.” But it is like that. So, it's not an official guideline but there is an unofficial guideline. It's not written but it's said between you and me. So, if you are working for Bayerischer Rundfunk, of course, you're more CSU. (What do you think of the situation nowadays?) I think it is even worse. Because politicization of media is deepening more and more.”

- German interviewee No. 8

5.2.2.3 The Government’s Misuse of Institutional Power (* Differences in the Stance among Journalists)

In perceiving ‘something’ the government exerted on the press, German journalists responded to <Figure 26> showing organs or performers that have got involved in the government’s influence on the press. The schema shows the following organs: Federal Chancellor’s Office (Bundeskanzleramt), Federal Press Office (Bundespresseamt, BPA), Federal Ministry of the Interior (Bundesministerium des Innern, BMI), Federal Public Prosecutor’s Office (Generalstaatsanwaltschaft, GBA), Federal Criminal Police Office (Bundeskriminalamt, BKA), three major intelligence agencies¹⁰³ under the federal government—Foreign Intelligence Service

¹⁰³ Germany’s three major intelligence agencies

- Bundesnachrichtendienst (BND): As the only overseas dedicated intelligence service in Germany, it collects information in the areas of the military and civilian. It was established in 1956 and is directly subordinate to the Federal Chancellor’s Office. The headquarters are located in Berlin, and it is known to have hundreds of branch offices at home and abroad.
- Bundesamt für Verfassungsschutz (BfV): As the intelligence service in charge of gathering domestic information, it gathers

(Bundesnachrichtendienst, BND), Domestic Intelligence Service (Bundesamt für Verfassungsschutz, BfV), Military Counterintelligence Service (Militärischer Abschirmdienst, MAD)—and agencies under state governments.

When the influence, which was exerted by government organs and officials that are bound together in the terminology of ‘government’ in this paper, is named ‘institutional power¹⁰⁴’, individual journalists’ stances on it differed. While journalists did not disagree on the two concepts like the government’s neoliberal market deregulation and the political influence from the inside/outside over public broadcasters, they were divided over the government’s misuse of institutional power. For this reason, it is difficult to view that the misuse of institutional power has representativeness as one of the reasons/backgrounds of journalists’ perception.

However, it is necessary to listen to the opinions of some journalists, not the whole, who were concerned about the impact of misuse of institutional power on the press to find out how the stances of German journalists were divided. Above all, it was identified that such a difference in stance is related to the difference in German journalists’ perception of whether what their government exerted on the press was ‘influence’ or ‘control’. Therefore, in order to understand the background of the difference in the journalists’ perception, it is described as below. Also, it is to be stated in advance that this is an opinion of some journalists.

Each journalist took different stances, each of which was primarily concerned with surveillance and information gathering on journalists by the Federal Intelligence Service (Bundesnachrichtendienst, BND)—refer to case 1-6 in <German Cases’ Integrated Datasheet>. For equal comparison, therefore, the German journalists’ stances on the same issue were analyzed.

i. Denied, Trust in the Government

German interviewee No. 2, who perceived that “The government had an influence on the press partly and limitedly”, took up the position that institutional power within Germany has not been misused. He added that there is a need to separate institutional influences from personal influences (like abuse of authority or deviation) by the government officials, with regard to the cases collected by the researcher.

He did not acknowledge the German government’s misuse of institutional power, and expressed confidence in his government, which is in line with the interview answer of German interviewee No. 1, a current high-ranking official from the federal government who could represent the stance of the government.

“The influence, what you mean is institutional control and influence. That doesn't exist. We have to differentiate between the institutional influence and the personal influence which depends actually on the persons involved. ... Surveillance is regulated by law and controlled by parliament.”

- German interviewee No. 2

“Der Schutz der Pressefreiheit in Deutschland ist ein außerordentlich hohes Gut. Artikel 5 des Grundgesetzes schützt die Presse- und Meinungsfreiheit in besonderer Weise. Die Pressefreiheit ist ein fester Pfeiler unserer

and analyzes information on the extreme right/left, Islamic extremism and terrorism, and also surveils anti-federalism activities. It was established in 1950 and has been under the Federal Ministry of the Interior since 2000. The headquarters are located in Cologne, and it maintains a cooperative system with local intelligence services (Landesbehörden für Verfassungsschutz) being under the control of each of 16 states’ Interior Ministries—in 7 states, each local intelligence service stands alone as a separate form (Landesamt für Verfassungsschutz, LfV), while in 9 states, it belongs to one of the divisions within the state Interior Ministry.

- Militärischer Abschirmdienst (MAD): As the military agency for anti-spy and counter-espionage, it gathers information that corresponds to the work area of the Federal Ministry of Defence. It was established in 1956 and is under the Federal Ministry of Defence.

¹⁰⁴ In general, ‘institutional power’ refers to the power wielded by entities like governments, churches, and corporations to control people and direct their behaviors through the use of rewards and punishments. Academically, US political scientist Daniel Wirls (2015, p. 5) defined that “Institutional power is an assessment or measure of an institution’s overall ability to influence the system within which it operates, relative to the other systemic institutions with some authority and relative to its degree of power across time.”

Demokratie. Schon allein die grundgesetzliche Verankerung der freien Presse in Deutschland verbietet die Einflussnahme auf Journalistinnen und Journalisten und deren Berichterstattung durch staatliche Stellen.”

- German interviewee No. 1

The two journalists, who perceived that “The government had an influence on the press”, seemed as if they do not have any particular awareness of the problem of institutional power within Germany, or, even if they do, they were not seriously concerned about it. Thus, it can be stated that they, too, trust their government.

“I think the surveillance act of BND is dangerous. I don’t see that the government is observing the press by a microscopic approach. I firstly do not think that the BND and government are the same thing. I secondly see that the BND is focusing on exterior media, even though there have been cases of German journalists who have been under surveillance by the agency.”

- German interviewee No. 3

“(Why did the German government surveil the press extensively through a microscopic approach?) I have no expertise on state surveillance.”

- German interviewee No. 7

ii. Partly Admitted; however, Trust in Institutional Power within the System

German interviewee No. 5, who perceived that “The government had an influence on the press”, did have awareness of the problem of the government’s misuse of institutional power, but took a wait-and-see (or lukewarm) attitude yet.

“(Surveillance on the world’s major press by the Federal Intelligence Service (BND) and amendment to the BND Act (das neue BND-Gesetz)¹⁰⁵. In conclusion, German surveillance on the press has been implemented extensively. What do you think of this?) Ich sehe dies ähnlich. Inzwischen wurde ja von mehreren NGOs Verfassungsbeschwerde gegen das BND-Gesetz eingereicht.”

- German interviewee No. 5

Two other journalists, German interviewees No. 4 and 6 who perceived that “The government had an influence on the press”, have clearly acknowledged the government’s misuse of institutional power and expressed serious concerns; however, they took the position that they must and have no choice but to trust the institutional power within the system.

“I am afraid, this is what intelligence services do, although the German BND may not spy on their own journalists, they sometimes also did and got caught about it. But they may spy on foreign journalists. It is nasty, it doesn’t show trust among allies. But most of it is happening in a legal framework, in South Korea as in the US as in Germany or other democracies.”

- German interviewee No. 6

“We try to change the BND law. It is awful. And we have similar cases here in Saxony and we are fighting against those too. For instance, last year I was writing to our Minister of Interior Affairs and Minister of Justice because there was surveillance of people here in Leipzig. The police did the surveillance, and they, by chance, surveilled journalists too. But they didn’t tell them and they didn’t immediately erase the data. So we have these problems in Saxony too. So, I just want to tell you that I know and we are trying to fight this. ... Together with Reporters Without Borders, the DJV¹⁰⁶, our journalist organization is fighting against surveillance of journalists. But unfortunately, by now it’s the law. They are allowed to surveil foreign journalists.”

- German interviewee No. 4

¹⁰⁵ The BND’s intelligence activities against foreign media are being legally justified with the implementation of the BND Act (das neue BND-Gesetz) in January 2017.

¹⁰⁶ Deutscher Journalisten-Verband (DJV), the German Journalists Association, is among the largest journalists’ organizations in Europe.

Reporters Without Borders (Reporters sans frontières, RSF) published the World Press Freedom Index in 2018, where they ranked Germany as 15th in the world but clearly stated that the BND Act was a risk factor for freedom of the press. After enforcement of the BND Act, the German branch of Reporters Without Borders (Reporter ohne Grenzen, ROG) asked the European Court of Human Rights to rule on mass surveillance on journalists by the BND on November 30, 2017. Also, in order to establish the unconstitutionality of the BND Act which allows the BND to have the unfettered surveillance authority by exempting its legal obligation to protect media and telecommunication's basic rights outside the German territory, the German branch filed a constitutional complaint with the German Constitutional Court in solidarity with five domestic and overseas civil society organizations in January 2018 (Reporters Without Borders, 2018; Fürstenau, 2018).

German press circles are concerned about the illegality of the BND legislation and the potential issues that may arise from the amended BND Act; however, they have come to accept the existing circumstance because there is nothing else they can do, as it is shown in the interview with German interviewee No. 4 above.

iii. Admitted, Distrust in the Government

German interviewee No. 8, who alone perceived that "the government exerted control over the press", recognized the German government's misuse of institutional power based on his own direct and indirect experiences, and further, took a negative stance on the government's willingness to respect covering and reporting.

"They do not want that foreign press reports negative about German government. Because of my research with financial things, I have some colleagues from Israel and they asked me "Why does the German government not answer our questions? They ignored the e-mail and do not answer the questions." This is crazy. How can you do that with journalists? They cannot do anything because they just don't answer the questions. And the same did it with me but they do it with the foreign press, the same. That's the funny thing. If foreign press is too critic about the German government, they do not get an answer. So, most of foreign presses are very positive about Germany.

- German interviewee No. 8

He asserted the 21st-century German government's misuse of institutional power was not the same way it was before the German reunification (Deutsche Wiedervereinigung). Then, he said, "It's more subtle" than before and stressed the difference between the past and the present.

iv. Conclusion

<Figure 32> is a visible expression of how 7 German journalists interviewed viewed their institutional power.

As illustrated, individual journalists take different positions depending on the positive/negative evaluations or stances on their institutional power, and such positions are apparently linked to the journalists' perceptions of 'something' the government exerted on the press:

- The individual on the very left of <Figure 32> who trusted the government with the stance that institutional power within Germany has not been misused, is German journalist interviewee No. 2 who perceived that "The government had an influence on the press partly and limitedly";
- Those who did not have serious concerns and awareness of the problem of institutional power, or those who did but still trusted it within the system are the journalists who perceived that "The government had an influence on the press";
- One individual who took the position that the government misused institutional power, is German interviewee No. 8 who perceived that "The government exerted control over the press".

Therefore, it can be inferred that the German journalists' perceptions of 'something' the government exerted on the press may be different depending on their positive/negative assessments or stances on institutional power, and vice versa. And considering the interview with German interviewee No. 8, direct or indirect experiences of individual journalists could serve as a decisive factor for such an assessment or stance.

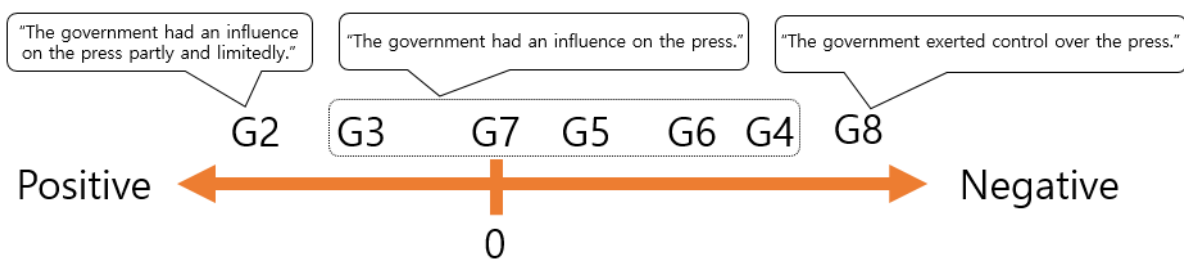


Figure 32.7 German journalists' stances on their institutional power (Spectrum)

Chapter 6. Conclusion

6.1 Overall Summary of Study Results (Including Answers to Research Questions)

This study aimed to identify what and how governments in the 21st-century democracies exerted on the press, how the media environment responded to that, and what perceptions journalists have of their government's influence. To this end, the researcher took, as objects of the study, two countries of the East and the West, South Korea and Germany which are internationally recognized as countries with freedom of the press due to fairly developed democratic systems and have different forms of government.

In line with the objective of the study, the tendencies of the South Korean and German governments' influence on the press and the responses of the media environment to it were identified through the case study. Then, through in-depth interviews with questions based on the results of the preceding case study, journalists' perceptions of their government's influence and the reasons/backgrounds for their perceptions were grasped.

The study results obtained from the case study and the in-depth interview is summarized below. With this, the researcher simultaneously presents answers to the Research Questions.

6.1.1 Case Study

The researcher collected 20 cases each in South Korea and Germany where the independence, autonomy or critical ability of the press were damaged by the governments, and sorted the key elements in each case according to 10 analysis categories and created a database. With this, the researcher identified the tendencies (patterns) of the governments' influence on the press and the media environment's responses to that. This relates to Research Questions 1 and 1-1.

6.1.1.1 Tendencies of the South Korean and German Governments' Influence on the Press

First of all, as a result of checking the main types that were shown in South Korea and Germany based on '5 types (ways) of government influence on the press'—refer to <Figure 15>—designed by the researcher there was a clear difference:

- Relatively, the South Korean government pressured the press with a 'proxy way' in which it put forward a certain person or agency that could do something on behalf of the government, and forced press companies to produce reports favorable to the government through 'interference in reporting'. And there were many cases of 'self-censorship under government influence' (6 out of 20 cases);
- The German government influenced the press mainly in a 'direct way' (12 out of 20 cases), such as restriction on coverage and surveillance on journalists, etc.

The difference in the types (ways) of South Korean and German governments' influence on the press led to the difference in organs or performers involved in executing the influence:

- In South Korea, almost all of the organs or performers were related to the 'President', the head of administrative power—refer to the table below <Figure 25>. Presidential agencies such as the Presidential Executive Office (Blue House), National Intelligence Service and Korea Communications Commission were mobilized in the execution of the government's influence. The President of South Korea, who could directly or indirectly influence the appointments of the CEOs of public broadcasters and the chairman of the Korea Communications Commission that takes charge of broadcasting sanctions, appointed his closest associates to the posts, and they put pressure on their employees (journalists) to reflect the will of the government;
- In Germany, almost all of the involved organs or performers were associated with the 'ruling party (CDU/CSU Union)', except for 3 self-censorship cases—refer to the table below <Figure 26>. As stated in Part 3.1 Operational Definitions of Keywords, the researcher added 'ruling party', which takes charge of operation of the executive under a parliamentary cabinet system, to the concept of government. This means that the influence has been implemented centering around the power group (ruling party), not the powerful like in South Korea;
- Organs or performers involved in the execution of the governments' influence on the press appeared more diverse in Germany than in South Korea. This was because in Germany, a federalism country, federal states (Bundesländer) which are recognized for State independence (staatliche Eigenständigkeit), namely state governments

(Landesregierungen) as well as the federal government exerted an influence on the press. After all, this difference comes from South Korea and Germany having different forms of government—South Korea is a unitary state under a presidential system, while Germany is a federal state under a parliamentary system.

What is unique about the methods of intention delivery between executors for exerting the government's influence is that the common method of intention delivery used for the 'interference in reporting' was 'call in person,' both in South Korea and Germany. The performers called for immediate and clear handling/resolving of particular issues by personally delivering their intentions over the phone—for instance, request/demand for non-reporting, demand/instruction for change in the reporting direction, etc. However, the achievement rate (success rate) of the method, 'call in person,' was not so high.

The types (ways) in which the governments exerted an influence on the press brought about different execution results of the governments' influence:

- In South Korea, there were more execution results done by the executives within media companies than by government bodies due to the proxies appointed by the government (President)—mainly the CEOs of public broadcasters. That is to say, there were many cases in which the CEOs and executives of media companies that were influenced by the government took disciplinary actions against their journalists who protested pro-government reports or pursued critical reports on the government, and arbitrarily decided the production/reporting of articles or journalistic contents for the purpose of government-biased reporting. This shows that the executives of media companies aligned with the regime through abuse of authority, and it suggests the degree of the collusive ties between the government and the press;
- In Germany, there were a lot of execution results done by government bodies. This is because there were many 'direct way' cases (12) in which the government mobilized relevant bodies to exercise an influence. Specifically, the execution results done by the government bodies were restriction of covering (4), surveillance on journalists (4), instruction for reporting direction (3), and prosecution investigation (1).

In terms of macroscopic intention, both in South Korea and Germany, the governments' influence on the press was exerted mainly as a 'pre-emptive/planned measure' before unfavorable articles were reported. It can be viewed that the governments took an active approach to exert an influence on the press:

- However, the German government's influence on the press was proactive, and thus it was premeditated and had a long-term effect, while the South Korean government's influence was exerted spontaneously—which was virtually a follow-up/reactive measure—whenever unfavorable articles were expected to be reported. Hence, technically, the South Korean government's 'pre-emptive/planned measures' are somewhat different in nature from those of the German government.

The governments' influence exerted on the press with specific intentions succeeded in achieving its goal by 90% (18 out of 20 cases, including 1 partial success) in South Korea, and 70% (14 out of 20 cases) in Germany. The extent to which the governments' intentions have been accepted by media companies (journalists) or reflected in reports give an idea of the degree of independence and autonomy of press circles in each country.

In terms of the timing, the South Korean government's influence exerted on the press with specific intentions had distinctive features:

- The South Korean government's influence has been exerted on the press between the first and third years of the five-year presidential term. Linking this to South Korea's form of government, it can be interpreted that the South Korean government, under the political system of 'five-year, single term presidential system', exerted its influence on the press at the early stage of the regime to prevent weakening of power of the President caused by reporting unfavorable articles;
- The German government's influence on the press was evenly distributed throughout the regime;
- Cases that demonstrate that the governments' influence was concentrated at certain periods of time were identified, and through this, it can be guessed what issue the government did not want to be reported was or what issue the government was concerned about in terms of report content was. Examples are, in the case of South Korea, the 'corruption in which the National Intelligence Service had intervened in the presidential election through manipulation of public opinion' in June to September 2013, which is related to the birth of the Park Geun-hye government, and refugee-related issues since the second half of 2015 in the case of Germany.

Media which the governments' influence has been frequently exerted on were public broadcasters in both South Korea and Germany. A common feature in another aspect is that there was no case in which the governments only targeted private broadcasters:

- Meanwhile, in terms of the target scope (sort), the German government targeted individual journalists, which are smaller units than media companies, and foreign major media. Also, it had an influence on not only legacy media such as newspapers and TV, but also new media such as online media (blogs/websites) with press characteristics.

6.1.1.2 Responses of the Media Environment to the Governments' Influence

In terms of the media environment, subjects who visibly responded (resisted) to the governments' influence showed a clear difference between South Korea and Germany:

- In South Korea, 'Targeted media company or journalist' actively resisted the government's influence. Specifically, they are labor unions or journalists associations in public broadcasters, the main targets of the government's influence. As the representative organizations that protect and represent the rights and interests of fellow journalists, they responded quickly by clarifying the relevant facts and details through their members (journalists) who have experienced the violation of freedom of the press. Furthermore, they took active and dynamic actions overall such as protesting rallies/protests, revelation press conferences and revelations using online media;
- In Germany, 'Other media companies' actively exposed the fact that the government exerted an influence on press circles. Specifically, they are private media. The corresponding private media included newspapers, magazines, broadcasters and online media, and had a wide spectrum;
- Among the subjects that visibly responded (resisted) to the governments' influence, 'Media/Civic organizations' and 'The new government after a regime change' were seen in both South Korea and Germany. This shows the level of awareness of press freedom by press circles and civic societies of each country. And it suggests that there exists a difference in the awareness (respect) of the independence and autonomy of the press depending on the inclinations of the regimes.

In terms of the means to respond (resist), there are cases both in South Korea and Germany where the execution of the governments' influence was easily thwarted by criticisms or revelations through online media. Based on those cases, social media and new media such as SNS, which are not easy to block and control and especially can overcome temporal and spatial constraints, can be used as a means to immediately respond (reveal, warn, or protest) to and neutralize government influence on the press.

The timing of visible response (resistance) to the governments' influence by each internal factor in the media environment did not show any particular difference. In both South Korea and Germany, the response usually appeared shortly after the governments' influence was exerted. It can be seen that government influence on the press has been properly monitored in both countries.

6.1.1.3 Summary and Comparison

Government influence on the press	South Korea	Germany
Main type (way)	As noticeable types, 'Proxy way', 'Interference in reporting' and 'Self-censorship under government influence'	'Direct way', which included 12 cases
Executors of influence (involved organs)	Almost all of the organs or performers were linked to the 'President'.	Almost all of the organs or performers were associated with the 'ruling party (CDU/CSU Union)', except for 3 cases of

or performers)		self-censorship. In addition, there were various organs or performers involved in executing the government's influence compared to South Korea.
	This is the result of different forms of government in South Korea and Germany—South Korea is a unitary state under a presidential system, while Germany is a federal state under a parliamentary system.	
Intention delivery methods among executors	In both countries, the method of 'call in person' was often chosen for the purpose of 'Interference in reporting'. For example, calls for the demand for non-reporting, and calls for the instruction for change in reporting direction.	
Execution results	There were many execution results by the executives inside media companies through proxies such as public broadcasters' CEOs appointed by the government (President). For example, in-house disciplinary actions such as dismissal, suspension, salary reduction and demotion, etc.	There were many results executed by government bodies. For example, restriction on coverage, surveillance on journalists, instruction for reporting direction, etc.
Macroscopic intention	In both countries, the governments' influence was exerted as a 'Pre-emptive/Planned measure' before unfavorable articles were reported. Their intentions were the same; however, they were different in nature. In Germany, the government's influence on the press was proactive, while in South Korea, it was impromptu so as to deal with the impending situations.	
Intention attainment or not	In 18 out of 20 cases (including partial success 1 case), the government achieved certain goals by exerting its influence on the press.	In 14 out of 20 cases, the government's intentions were accepted by media companies or reflected in reporting.
Timings	The government's influence was concentrated in the first to third years of the five-year tenure of the President.	The government's influence was evenly expressed throughout the regime.
Targeted media	In both South Korea and Germany, the governments' influence was frequently exerted on public broadcasters. On the other hand, there was no case in which the governments only targeted private broadcasters.	

Media environment's response to Government influence	South Korea	Germany
Visibly responding (resisting) subjects	‘Targeted media company or journalist’ actively resisted the government’s influence. Specifically, they are labor unions or journalists associations in public broadcasters, the main targets of government’s influence.	‘Other media companies’ actively exposed the fact that the government exerted its influence on press circles. Specifically, they are private media.
	In both South Korea and Germany, ‘Media/Civic organizations’ and ‘The new government after a regime change’ came on as subjects responding to the governments’ influence on the press.	
Visibly responding (resisting) timings	In both countries, each media environment factor usually responded (resisted) shortly after the governments’ influence was exerted.	

6.1.2 In-depth Interview: Journalists’ Perceptions of Their Government’s Influence and the Reasons/Backgrounds in terms of the Media Environment

Through questions based on the results of the case study, the researcher identified what perception each of the seven South Korean and German journalists had of their government’s influence—in other words, what journalists considered ‘something their government exerted on the press’ to be—and why they thought so. This relates to Research Questions 2 and 2-1.

6.1.2.1 South Korean Journalists’ Perceptions

6 out of 7 South Korean journalists perceived that their government exerted ‘control’ over the press at the time (2008-2017) relevant to the collected cases. This perception was found from both journalists working (or having worked) in public broadcasters and in private media, and their perception of ‘control’ was based on their direct or indirect personal experiences. In other words, journalists who were disadvantaged or disciplined for ‘something’ the government exerted, or those who witnessed fellow journalists having undergone such things perceived ‘something’ as control. The other journalist (South Korean interviewee No. 2), who served as the CEO of a private newspaper and a private broadcaster, took up the position that the government had an ‘influence’ on the press out of necessity in the communication process between the government and the press. He did not have the feeling that he had been harmed by the ‘government influence’ he perceived.

Despite the differences in perception, 7 South Korean journalists shared a common awareness of problems. They pointed out, as serious problems, the current governance structure of public broadcasters in which the government (President) could directly or indirectly affect the appointments of public broadcaster CEOs, and the in-house control, such as demand for pro-government reports from the CEOs appointed by the government (President). In addition, as reasons for their negative perception, they cited that the government mobilized government bodies, especially agencies directly under the President such as National Intelligence Service, to surveil media companies and journalists, and that the government used to abuse regulations, such as the re-licensing (re-approval) system for broadcasters and broadcasting deliberation, as a means of control. Also, they claimed that top-level executives of public or private media who followed the government (political power) or were scouted into the central position

of power (Blue House), namely the media environment-internal factor, contributed to the government's execution of an influence on the press and further promoted it.

All South Korean journalists interviewed agreed on the existence of collusive ties between the government (leading members) and media companies (top-level executives), but they had different ideas on the relationship between the two. 6 journalists, who perceived that "The government exerted control over the press", claimed that the government's control over the press was possible because it has colluded with media companies in a 'relationship in which the government had the upper hand'. On the other hand, one journalist, who perceived that "The government had an influence on the press", said that the government and media companies maintained equal collusive ties through 'mutual cooperation'. Thus, it can be inferred that the journalists' perception of the government's influence was divided into 'control' or 'influence' depending on the stance on the relations between the government and the press, and vice versa. Moreover, it is highly likely that the careers and personal experiences of individual journalists, and the governance structure of media they are (or were) engaged in have served as the critical factors for such stances.

6.1.2.2 German Journalists' Perceptions

6 out of 7 German journalists perceived that their government had an 'influence' on the press at the time (2000-2018) relevant to the collected cases. One of them (German interviewee No. 2) replied, "The government had an influence on the press partly and limitedly". Their perception of 'influence' was found from both journalists working (or having worked) in public broadcasters and in private media, and it originated from the following premise: 'Since power in Germany, a federal state, is decentralized and there is no control system, press control itself is impossible.' In other words, they argued that it does not have the conditions and systems to be preconditioned to be able to refer to it as press control, and therefore, it is not appropriate to mention the term 'control' itself. So, it is right to perceive it as the government's 'influence' on the press, which is a broad concept, they said. One remaining journalist (German interviewee No. 8) took up the position, "The government exerted control over the press". Among the German journalists, he was the only one to respond positively to the common question, "Have you ever experienced government control of the press—that is, pro-government reporting directives or government influence such as disadvantages for opposing those directives?".

7 German journalists also shared some common awareness of problems of their government's influence, despite the differences in perception. They said the government's influence on the press has intensified as collusive ties between political power and media power—the so-called 'Neoliberal Network'—strengthened. As the background of such collusive ties, they pointed to media market concentration and oligopoly formation by a small number of media conglomerates and their pursuit of economization, following the German government's neoliberal market deregulation policy in the 1990s. In other words, the government's policy, namely the media environment-external factor, which caused structural changes in the media market, became a fundamental background for journalists' perception of government influence. Besides that, political influence from the inside/outside over public broadcasters, such as the partisanship of supervisory boards (the broadcasting board and the board of directors) in German public broadcasters and the exercise of influence by the state governments due to the close affinity ('Staatsnah') between local public broadcasters and state governments that have jurisdiction in the area, were cited as the background of German journalists' perception.

Meanwhile, individual journalists' stances on 'institutional power', which is the influence exerted by government organs and officials that are bound together in the terminology of 'government' in this paper, differed. 6 journalists who perceived that "The government had an influence on the press"—in a greater or less degree—appeared to still trust their government or institutional power. On the other hand, one journalist, who perceived that "The government exerted control over the press", expressed a deep distrust of the government while arguing that the government misused the institutional power. He, however, asserted the 21st-century German government's misuse of institutional power was not the same way it was before the German reunification (Deutsche Wiedervereinigung), and that "it's more subtle" than before. In this sense, it can be inferred that there were differences in the journalists' perception of the government's influence depending on the stance on the government or their evaluation of institutional power, and vice versa. Moreover, it is highly likely that the careers and personal experiences of individual journalists, in particular, have served as the decisive factors for such stances.

6.1.2.3 Comparison

Following is the comparison of the South Korean and German journalists' perceptions of their government's influence. This relates to Research Questions 3 and 3-1.

The most noteworthy part and as well as the common feature is that the perceptions of the journalists of each country converged to one side. That is, in South Korea, many journalists took a stand that "The government exerted control over the press" whereas in Germany, "The government had an influence on the press". This demonstrates that the journalists of each country have shared the concepts of the two terms, 'control' and 'influence' under an implicit agreement. Furthermore, they recognized the intensity of the 'control' and 'influence', which are the 'something' the government exerted on the press, by comparing and dividing the two as follows: Control > Influence.

Based on this, however, it is difficult to say that the degree of intensity of the government's influence the South Korean journalists perceived is much greater than what the German journalists did—or that the South Korean journalists had relatively negative perception of their government's influence.

It is because the criteria for journalists to choose particular terms to externalize their own perceptions of government influence—which were consistent among journalists from the same country—differed between countries. The base of many South Korean journalists' perception that 'something' their government exerted was 'control' commonly originated in the disadvantages or disciplinary actions they have directly or indirectly experienced. It is quite likely that the negative/pessimistic perceptions which originated in their experiences caused their choice of the term 'control', which is more intense than the term 'influence'. On the other hand, many German journalists commonly defined 'something' their government exerted as 'influence', stating the reason that 'control' itself is impossible since the system for press control does not exist in Germany. In other words, the German journalists, after tackling the conditions and situations, tended to use the term 'control' exactly or narrowly, and chose to use the term 'influence' which is a macroscopic concept, instead of 'control'. To sum up, in order to determine whether the governments exerted 'control' or not, the South Korean journalists based their judgments on their direct or indirect experiences, while the German journalists based it on whether the system for press control existed or not.

In conclusion, although South Korean and German journalists had different perceptions of their government's influence, a simple comparison between the two cannot be made since they had different criteria for journalists from each country to choose particular terms to externalize their perceptions. Instead, one could compare the perceptions of the government's influence by the journalists in each country with the degrees of press freedom (Press Freedom Index) for the country externally known.

During the period (2008-2017) when a number of South Korean journalists perceived that "The government exerted control over the press", South Korea's Press Freedom Index externally known continuously corresponded to 'Free' or 'Partly Free', which is close to 'Free'¹⁰⁷. Through this, it could be stated that the South Korean journalists' perception of their media environment is more negative/pessimistic than the external evaluation. From a different perspective, it may be questioned whether the perceptions (opinions) of local journalists have been reflected enough in the external evaluation of each country's degree of press freedom.

In the case of Germany, during the period (2000-2018) when many journalists perceived that "The government had an influence on the press", Germany's Press Freedom Index externally known constantly corresponded to 'Free'. Based on the fact that many German journalists chose to use the term 'influence', which is less intense than 'control', to express their perception of the government's influence, and that they took up the position that they still trusted their government or institutional power, it can be said that the German journalists' perception of their media environment is in line with the external evaluation to some degree.

¹⁰⁷ The lower the rating (total score) given by Freedom House, the higher the degree of press freedom. If the evaluation score is 30 or less, the status of press freedom corresponds to 'Free'.

Press Freedom Index		2010	2011	2012	2013	2014	2015	2016	2017
South Korea	Status	Free	Partly Free	Partly Free	Partly Free	Partly Free	Partly Free	Partly Free	Partly Free
	Rating	30	32	32	31	32	33	33	34
	Ranking	67	70	68	64	68	67	66	66
Germany	Status	Free	Free	Free	Free	Free	Free	Free	Free
	Rating	17	17	17	17	17	18	20	20
	Ranking	19	17	16	19	18	22	25	25

Figure 33 External evaluation of South Korean and German press freedom (2010-2017)
(Source: Freedom House, 2017)

6.2 Key Findings

6.2.1 Tendency of Government Influence I: Implications of Targeted and Non-targeted Media

Through the case study, it was revealed that the governments' influence was mainly exerted on public broadcasters both in South Korea and Germany. The reasons/backgrounds of public broadcasters being the main target were found in the in-depth interviews with journalists from each country. It is because of the system that allows government (political) influence to be exerted on public broadcasters, or the media environment that makes it possible. In the case of South Korea, it was due to the governance structure of public broadcasters, and the political influence from the inside/outside over public broadcasters in the case of Germany.

As described in Part 2.5, many of the public still trust legacy media such as TV, radio and newspapers, and consume news via them—refer to <Figure 13> and <Figure 14>—and above all, the ripple effect of public broadcasters (with high viewer ratings and credibility) is generally greater than that of private media. Therefore, it appears that the governments mainly targeted public broadcasters and influenced them, considering the effectiveness of the influence.

However, it was confirmed that in Germany, the government exerted influence on new media as well, such as online media (blogs/websites) with press characteristics. This means that the German government recognized and accepted the changes in the media ecosystem. In this sense, the scope of target media on which the German government will influence is likely to expand in the future.

The Council of Europe (2011) adopted a new and broad notion of media early, considering the developments in the media ecosystem, and the European Parliament (2018) has stressed the need to expand the scope of journalists. It can be said that this move was to ensure freedom of speech and expression in preparation for the above situation.

Another common feature in terms of target media is that there are no cases in which the South Korean and German governments only targeted private broadcasters to exert influence. That is to say, the governments refrained from or avoided exerting influence on private media. Behind such a result was, considering the interviews with journalists from each country, the collusive ties of interests between the government (political power) and private media.

Specifically, the South Korean government used regulations such as the re-licensing (re-approval) system for broadcasters as a means of pressing private broadcasters, and accordingly, the owners of the broadcasters frequently directed their journalists to refrain from reporting unfavorable to the government (i.e. self-censorship) in order to maintain friendly relations with the government with the aim of getting re-licensing (re-approval) and maximizing the profit. The South Korean journalists explained that this was the reason why the government's influence on private broadcasters was limited. The German journalists said that in Germany, the government did not have to exert influence on private media due to the so-called 'Neoliberal Network', collusive ties between the

government that pursues neoliberal policy and private media conglomerates that prop up such policy which is suited to their pursuit of profit.

In the case of Germany, another interpretation can be made when focusing on the ‘oligopoly of a small number of media conglomerates’. German media scholar Beate Schneider (1998, p. 425) claimed that amid intensifying competition after media deregulation, intermediary cooperation and mergers between newspapers and magazine publishers as well as broadcasting companies took place to strengthen their positions in the media network, and that the capabilities for media policy control have decreased as the market power of individual corporations increased. In other words, the government’s media policy failed to achieve its goal due to the strong market dominance of a small number of media conglomerates. As stated in Part 5.2.2.1.1 Media Market Concentration (Röper, 2016), around 60 percent of total paid circulation in the German newspaper market in the first quarter of 2016 came from just ten major publishing groups, of which five largest publishing groups dominated 99.5 percent of the total newsstand newspaper market: Axel Springer SE (with a market share of around 79%), DuMont, Ippen, Morgenpost Sachsen and Abendzeitung München.

With public broadcasters being the main target of the governments’ influence, the deepening collusive ties between private media and the government would mean less voices of criticism of the government. In particular, in the case of South Korea, the statement of South Korean interviewee No. 8 that journalists have frequently practiced self-censorship within private media under the collusive ties in which the government gains the upper hand formed by the government’s misuse of regulations shows a serious undermining of the autonomy and critical ability of the South Korean press. Furthermore, the fact that the licensing system, along with censorship, is known as a representative means of controlling the press by authoritarian governments (Nord, 1977, p. 8) suggests the level of the South Korean media environment in terms of institutional aspect. Freedom House (2011, p. 21) stated that the misuse of licensing and regulatory frameworks became a key method of control in semi-democratic and authoritarian settings, and emphasized that, in particular, authoritarian regimes have increasingly used “bogus legalistic maneuvers” to narrow the space for independent broadcasting.

6.2.2 Tendency of Government Influence II: Interpretation of the Period When the South Korean Government’s Influence on the Press was Concentrated

One of the most prominent tendencies is the fact that the South Korean government’s influence was intensively exerted on the press at a certain period of time. To be concrete, it was concentrated between the first and third years of the five-year presidential term—<refer to Figure 19>. It stands out even more because in Germany, there was not any distinct features in terms of the timing.

The researcher believes that such characteristic stemmed from ‘something’ of South Korea that is different from Germany, and points out the ‘five-year, single-term presidential system’, the form of government (power structure) in South Korea, as the ‘something.’ In other words, it is inferred that due to the five-year, single-term presidential system, the South Korean government’s influence has been intensively exerted on the press during the first half of the presidential term.

In South Korea, the ‘single five-year term’ was adopted through a constitutional amendment¹⁰⁸ to prevent the evils of dictatorship and long-term seizure of power in the wake of 1987 mass movements for democratization, along with the ‘direct presidential election system’. Hence, the South Korean President cannot serve consecutive terms (reelection), but has both the powers of the head of the state and of the head of the government (the executive) during a guaranteed five-year term—in other words, the President, the head of state, holds administrative power independent of the legislature. Since the power is concentrated in the hands of one President and policy decisions and implementations are absolutely dependent on the President, the President of South Korea can exercise great power while in office. In South Korea, this is often called the ‘Imperial President’ (Kim, 2007, pp. 143-144; Hahm, 2009, pp. 204-205).

¹⁰⁸ Constitution of the Republic of Korea (Wholly Amended by Constitution No. 10, Oct. 29, 1987)

Chapter IV The Executive, Section 1 The President

Article 70 The term of office of the President shall be five years, and the President shall not be reelected.

URL: https://elaw.klri.re.kr/kor_service/lawView.do?lang=ENG&hseq=1

After all, state affairs are run around the President who has enormous power so that he can retain public confidence and exercise his own power fully, and officials at government ministries or bodies implicitly work in a way that will not harm the President's exercise of power. However, due to the restrictions on serving consecutive terms (reelection) under the constitution article of 'single five-year term' and the focus of attention on the next government (leading presidential candidates), the so-called *Lame Duck*, which is commonly seen at the end of the presidential term, is unavoidable for the government. Given this reality, the South Korean government is likely to have tried to maintain the President's power by exerting influence on the press—that is, by demanding reporting favorable to the government and President or attempting to derail unfavorable reports—during the first half of the presidential term.

This can be also explained by the inverse relation of power between political power and press freedom claimed by US journalism scholar Fredrick S. Siebert (1952, pp. 6, 10)—refer to Part 2.3.1. Given that the political power (government) recognizes the press as something that attacks or poses a serious threat to it and imposes regulations or controls on the press in order to protect itself, the South Korean government is highly likely to have exerted influence on the press from the beginning of the presidential term to prevent unfavorable reports from weakening the President's power in the early stage. German political communication scholar Barbara Pfetsch (1998, p. 89) argued that the government's practices of news management ostensibly aim to inform the public about its policies and legitimate its decisions but they are related to maintaining or increasing political power. As stated in Part 2.3.2.4.2, one of the political environmental factors that could affect government news management for controlling the news media agenda is the role of the executive (depending on a presidential system or a parliamentary system). In countries with a presidential system, media-centered news management with the head of the executive as the central figure is likely to occur, and such news management focuses on maximizing the possibility of news coverage that allows the media audience to positively evaluate the government (President), and creating public support (Pfetsch, 1998, pp. 73, 78-79).

In this context, the researcher deduced that 'the South Korean government's influence on the press, under the single five-year term presidential system, was concentrated in the first half (between the first and third years) of the five-year presidential term for the purpose of maintaining the power of the President'. South Korean interviewee No. 1, a former high-ranking government official who can represent the stance of the government, said during the in-depth interview that it is only natural for government bodies and officials to work around the President under the presidential system, and admitted that the government's intention to exert influence on the press is ultimately related to the President, the head of the executive. Moreover, he specifically pointed out the Presidential senior secretary for public information who oversees media policies around the President as the figure in the government who materialized and planned the execution of influence on the press. The results of the case study that reveal that almost all of the organs or performers involved in the South Korean government's influence on the press were related to the 'President'—refer to the table below <Figure 25>—support the remarks of the former high-ranking government official.

In conclusion, the South Korean government's influence on the press was exerted by the organs and figures related to the President, and its ultimate purpose was to maintain the power of the President (prevent weakening), that is, to ensure that the power of the President is fully exercised without any hindrance. And it can be stated that the South Korean government's influence on the press was played out against the background of 'the single five-year term presidential system', the form of government (power structure) in South Korea. Cynically speaking in terms of the legal and institutional aspects of the media environment, the 'single five-year term' introduced to protect democracy in South Korea has caused an ironic situation in which it threatens press freedom that is essential for guaranteeing other kinds of freedoms as well as the democratic system—as mentioned in Part 1.2 and Part 2.3.2.1 (Sussman, 1989, pp. 190-191; Gunaratne, 2005, p. 345).

6.2.3 Journalists' Dichotomous Thinking about Government Influence

When journalists of each country were asked about their perceptions of their government's influence during the in-depth interviews, their answers were divided into two: "The government exerted control over the press" or "The government had an influence on the press". No one has even mentioned 'regulation' that the government could exert on the press.

As described in Part 2.3.2.5, the researcher, through reviews of preceding researches, divided government influence on the press, or more specifically, ‘something’ the governments exert on the press into three main things: control, regulation and influence—refer to <Figure 7>. However, although these three can be distinguished theoretically and conceptually, it is impossible to draw clear boundaries among the three because each definition and scope of the concepts are not yet clearly defined, and especially because the intentions of the subjects (government bodies/actors) that exert those things are unknown—that is, because of the ambiguity.

Despite such boundary ambiguity, it was confirmed that the perceptions of journalists in each country converged to one side of either ‘control’ or ‘influence’. The researcher believes that such a result stemmed from the characteristics (ambiguity) of regulation described in Part 2.3.2.3. Regulations have ostensibly legitimate purpose to protect the public interests and maintain social order, but it is difficult to grasp its intentions until the results of the regulations come out as it is likely to be misused as a means of control according to the intentions of the government or political power, the subjects of the regulations. Hence, it can be seen that the journalists interviewed perceived ‘something their government exerted’ as ‘control’ or ‘influence’, excluding ‘regulation’ which is uncertain (ambiguous), according to their respective normative criteria.

Therefore, based on the fact that there was no journalist in both countries who perceived that “The government regulated the press”, it may be provisionally concluded that journalists have a dichotomous way of thinking such as ‘control’ or ‘influence’ when perceiving and defining government influence.

To add to that, one could argue that many South Korean journalists have focused on the negative aspect of the government’s influence by perceiving that their government exerted influence on the press in a quite authoritarian and oppressive way, including misusing regulations as a means of control. On the other hand, many German journalists tried to comprehensively understand the government’s influence from a macro perspective by perceiving that their government had a widespread influence on the press in various ways in the process of communication or interaction, such as exerting influence on the media market through deregulation policies.

6.2.4 Difference in Understanding of the Concept of the Term ‘Control’

In perceiving the governments’ influence—that is, ‘something’ the governments exerted on the press—as ‘control’ or not, the South Korean journalists based their judgments on their direct or indirect experiences, while the German journalists based it on whether the system for press control existed or not. Through this, it was confirmed that there is a difference in understanding of the concept of the term ‘control’ between South Korean and German journalists, and that the term ‘control’ can be understood and used based on empirical or historical backgrounds aside from its dictionary definition¹⁰⁹.

The fact that the term ‘control’ has a relative meaning and is interpreted and used differently depending on the country is similar with the aforementioned phenomenon in Part 2.3.2.3 where the term ‘regulation’ has been

¹⁰⁹ The dictionary definitions of ‘control (verb)’ in the major online dictionaries of South Korea, Germany, the US and the UK are:

- 통제하다 (Korean)

1. 일정한 방침이나 목적에 따라 행위를 제한하거나 제약하다.
2. 권력으로 언론·경제 활동 따위에 제한을 가하다.

URL: <https://stdict.korean.go.kr/search/searchView.do?pageSize=10&searchKeyword=%ED%86%B5%EC%A0%9C%ED%95%98%EB%8B%A4>

- kontrollieren (German)

1. überwachen
2. in einem bestimmten Bereich o. Ä. beherrschenden Einfluss auf etwas haben, etwas beherrschen

URL: <https://www.duden.de/rechtschreibung/kontrollieren>

- control (US English)

1. To exercise authoritative or dominating influence over; direct.
2. To hold in restraint; check.

URL: <https://www.ahdictionary.com/word/search.html?q=Control>

- control (UK English)

to order, limit, or rule something, or someone’s actions or behaviour.

URL: <https://dictionary.cambridge.org/dictionary/english/control>

interpreted and used differently in the United States and Europe; and it can be inferred that the two phenomena originated in differences in historical or cultural backgrounds between the two countries (regions).

Likewise, there was a case similar to the researcher learning through the in-depth interviews that the term ‘control’ has a relative meaning in terms of journalism. US journalism scholar Norman Lewis (2008, pp. 361-363) conducted in-depth interviews with eight journalists who had either lost their jobs or were suspended due to plagiarism accusations, in order to examine why plagiarism has continued to stain the newspaper profession. He found in interviews that the definitional ambiguity of the term ‘plagiarism’ was part of the problem: “Plagiarism’s hard-to-demarcate nature and journalism’s aversion to attribution produce definitional ambiguity. Journalists disagreed over definitions and sometimes contended copying was not plagiarism if the author lacked malicious intent.” Moreover, his study showed that plagiarism was situationally defined, which means that editors associated plagiarism with dismissal when deciding to fire a journalist, and avoided using the word when retaining the journalist’s employment.

The characteristics of the term ‘plagiarism’ identified in Lewis’ study, which is situationally defined due to its elusiveness, are very similar to those of the term ‘control’ identified in this study. In particular, the German journalists’ perception that ‘something’ their government exerted on the press was ‘influence’—with the exclusion of ‘control’—on the basis of the absence of control system within Germany in the 21st century can be understood in this context.

Meanwhile, many South Korean journalists willingly used the term ‘control’ without being repulsed when referring to ‘something’ their government exerted on the press. The researcher raises the possibility that not only their direct or indirect experiences but also their social common notion has affected such phenomenon. In South Korea, the term ‘press control’ has often been used in not only mass media such as TV and newspaper, but also empirical or theoretical studies that deal with the relations between the South Korean government and the press, and the South Korean government’s media policies (Lee, 1996, p. 344; Chung, 1998; Han, 2005, pp. 236, 238-239, 241; Nam, 2006, p. 116; Kim, 2008, pp. 17, 20; Moon, 2008; Kim, 2009, pp. 44, 77; Kim, 2010, p. 163; Lim, & Kim, 2011; Cho, 2017)¹¹⁰. In their studies, no attempts have been made to classify government influence on the press in detail—unlike how it was classified into control, regulation and influence in this study. In particular, the book *Theory of Press Control*¹¹¹ (Suh, Cha, & Choi, 1983, p. 46), which has been cited like the ‘bible’ in the study of press control in South Korea, comprehensively defined the concept of ‘control’ as the “action or force of all external and internal factors affecting the output of mass media”. In this context, it is highly probable that South Korean media scholars, as well as journalists engaged in journalism, perceived ‘something’ the government

¹¹⁰ To help check the reviewed literature at one, it is listed as below.

Lee, Hyo-Sung. (1996). *The Coordinates of the Korean Press*. Seoul: Communication Books.

Chung, In-sook. (1998). The Degree of Press Freedom and Informal Control in YS Government. *Korean Journal of Journalism & Communication Studies*, 42(4), 57-99.

Han, Jong-ho. (2005). President Roh’s participatory government and press policies. *Kwanhun Journal*, 94, 233-241.

Nam, Hyo-yun. (2006). Constraints on the News Production Process in Local Newspapers: Influence of Newspaper Size. *Journal of Communication Science*, 6(1), 115-146.

Kim, Chong-hyuk. (2008). Who does the ‘Act on Press Arbitration and Remedies, etc. for Damage Caused by Press Reports’ exist for?. *Kwanhun Journal*, 107, 16-20.

Moon, Gab-sik. (2008). *Study of Media Control Policy: 5-Year Evaluation of Roh Mu-hyon Administration’s Media control* (Master diss.). The Graduate School of Hanyang University, Seoul.

Kim, Hong-jin. (2009). *A Study on the Systematic Regulation of the Government on the Press: Roh Government Period* (Master diss.). The Graduate School of Hanyang University, Seoul.

Kim, Sae-eun. (2010). From resistance to power: A reconstruction of Korean journalism history through dismissed journalists’ career and life. *Media and Society*, 18(4), 158-208.

Lim, Yu-jin., & Kim, Yung-wook. (2011). Government Public Relations Practitioners’ Perceptions toward Media Relations and False Reports: A comparative Study between the Noh Moo-hyun and Lee Myung-bak Governments. *Korean Journal of Communication & Information*, 55(3), 119-139.

Cho, Hang-je. (2017). Conceptualizing Self-Censorship as a Press Control. *Journal of Communication Research*, 54(3), 41-72.

¹¹¹ It was published during the military regime, before the democratization of South Korea in 1987, and it can be regarded as the first generation publication of the study on press control in South Korea.

exerted on the press as ‘control’ through a comprehensive approach, not an analytic approach. In addition, even after the democratization in 1987, the government frequently misused press regulations as a means of press control¹¹², and this experience has led to the tendency in South Korea for people to perceive (far stretch) ‘press regulation’ itself as ‘press control’ (Kim, 2009, pp. 42-44).

In conclusion, this study suggests that the term ‘control’ has a relative meaning depending on the country and can be defined situationally, and thereby provides understanding and information on the concept of particular terms to subsequent studies comparing South Korean and German journalism.

6.2.5 Under Government Influence, Perceptions of the Relationship between Government and the Press

In in-depth interviews, journalists directly or indirectly revealed their perception of what relationship their government and the press had under the governments’ influence. This is meaningful in that it allows us to look into the journalists’ perception of media autonomy in their own country. As described in Part 2.3.2.4.1, media autonomy (Medienautonomie) in German journalism is one of the theoretical criteria used to define the power relationships originating from mutual influences between the political system (including the executive) and the media system (Choi, 1995, p. 10). It means “ein erheblicher autonomer Handlungsspielraum ... wenn es selbst darüber entscheidet, welche Information es aufgreifen, weiterleiten und kritisch bearbeiten wird” (Ronneberger, 1978, p. 220) or “die Möglichkeit, alle mit Produktion und Verteilung publizistischer Aussagen verbundenen Entscheidungen selbst und unabhängig zu treffen” (Holtz-Bacha, 1990, p. 27).

6 out of 7 South Korean journalists viewed the relationship between their government and the press as ‘collusive ties in which the government has the upper hand’. They are the journalists who have experienced disadvantages or received disciplinary actions due to ‘something’ the government exerted, or those who had witnessed their colleagues undergoing such things, and they perceived the ‘something’ as ‘control’. The other journalist (South Korean interviewee No. 2) said that at least the private media, which he was engaged in, colluded with the government in an ‘equal, cooperative relationship’. He who perceived that “The government had an influence on the press” did not have the feeling that he had been harmed by the ‘government influence’ he perceived.

If the power relationship (relative size of influence) between the South Korean government and the press is defined by focusing on the ‘collusive ties in which the government has the upper hand’ that many South Korean journalists perceived, the relationship between the two would correspond to the ‘loss of media autonomy (dominance of political power)’ model. This model regards that the autonomy of the media is gradually lost as the political system uses the media as a tool, and this appears mainly in societies with an authoritarian regime even if democratic systems are in place.

Based on this theoretical approach, it can be inferred that many South Korean journalists recognize the degree of their country’s media autonomy as low and regard their government, which exerted influence on the press, as authoritarian. And there is a good possibility that this, in combination with their direct or indirect experiences, has affected their perception of government influence and vice versa.

On the other hand, the researcher did not gain explicit answers from German journalists about the relationship between their government and the press but was able to deduce their stance on the relationship from their answers in the in-depth interviews. Many German journalists agreed that political power and media power have formed collusive ties, or the so-called ‘Neoliberal Network’, for the concentration of wealth and power in a situation where a small number of media conglomerates formed an oligopoly due to media market concentration. In particular, German interviewee No. 7 said, “Government politicians and (private media) journalists are interdependent” and claimed that self-censorship has occurred within media companies against a backdrop of this interdependence, not because of government control. In general, it is known that self-censorship increases amid the media environment, including media market centralization, media commercialization due to intensifying

¹¹² For example, during the Roh Moo-hyun government (2003-2008), the government urged its bodies to actively utilize the press arbitration system—that is, the government strongly demanded corrections on reports unfavorable to it—and implemented the so-called ‘Advanced Media Support System’ policy that restricts reporters’ coverage of the government by abolishing and merging press rooms within government ministries.

competition, right-wing pressures on public broadcasting, and expanded and sophisticated news management, (i.e. public relations in the public and private areas) and so on (Herman, & Chomsky, 1988, p. 306; Pew Research Center, 2000). Based on this, it can be inferred that German journalists recognize the relationship between their government and private media as ‘mutually dependent’ collusive ties.

Considering that many German journalists particularly emphasized the collusive ties between their government (ruling party) and private media (not the whole media), if the power relationship (relative size of influence) between the German government and private media is defined, their relationship would correspond to the ‘symbiosis’ model. In this model, the gap between the political system and the media system gradually narrows, and both systems lose their own autonomy due to increased interdependence, making policy-making a product of cooperation (or division of task) by the interaction of the two systems.

According to German political communication scholar Barbara Pfetsch (1998, pp. 72-73, 78), in Germany that has the parliamentary political system and the strong party government, the working relationship between the government and the press is less adversarial, compared to a presidential state like the US. Under the German parliamentary cabinet system characterized by consensual roles between journalists and politicians, political news management frequently occurs, and such news management pursues the message concretization for political objectives of the executive as compared with the other political parties, and thereby aims to covertly orchestrate a “political game” among the political elites. And partisan media and public broadcasters foster political news management modes. As an example of this friendly and interdependent relationship between German political power (government) and the press, Pfetsch (1998, p. 84) cited “Background Circles (Hintergrundkreise)¹¹³” in Bonn, which are clubs of journalists who regularly invite politicians or their spokespersons. Such circles are platforms of continuous exchange and socializing in an unofficial form, and for government officials, in particular, they become tools to infuse issues and opinions into target media without giving the information an official label.

In conclusion, both South Korean and German journalists recognize that their governments form collusive ties with the press; however, the specific details of the collusive ties differ. South Korean journalists have the recognition that the autonomy of public and private media has been violated by the government’s powerful exercise of influence or misuse of influence. German journalists have the perception that private media maintain equal relations with the government, but they are concerned about the loss of media autonomy (e.g. self-censorship within private media due to deepening collusive ties). After all, as the collusive ties between the government (political power) and the press, and the violation/loss of media autonomy hinder or make it difficult for the media to perform its role as a watchdog for the government, there is a need for press circles to be wary of the deepening of collusive ties between the government and the press and to monitor the maintaining of its detachment from the government (*Staatsferne*).

In addition, as media market centralization and media commercialization caused by intensifying competition lead to the violation of internal press freedom (Innere Pressefreiheit), and consequently, the possibility and concerns of self-censorship are growing, countermeasures are needed. Turkish journalism scholar M. Murat Yesil (2014, p. 77) said that journalists’ self-censoring practices under political or economic pressure/coercion in an increasingly competitive media environment are a serious threat to the future of journalism and also that stopping self-censorship is not easy. However, he argued that educating journalists and providing a media environment that allows them to cover and report fully—i.e. to enhance the independence, autonomy and critical ability of the press—may be helpful in preventing self-censorship. The education he mentioned can be seen as a journalism education to raise journalists’ senses of professionalism and vocation. In order to break corrupt practices that have deepened collusive ties between political power and media power in the present situation where we cannot go against the neoliberal flow, it is also necessary to create and apply media self-regulation that is in tune with the times or stricter journalism code of ethics (McQuail, 2010, pp. 172-173).

¹¹³ The functional equivalent to this is the Parliamentary Lobby at Westminster in which journalists socialize with high-level sources (government officials) on a regular basis to exchange information or discuss agenda-setting (Pfetsch, 1998, p. 84).

6.3 Significance and Limitations of Results

The researcher identified and compared the tendencies of the governments' influence on the press in South Korea and Germany, two democratic countries with different forms of government (presidential system, parliamentary system) through the case study. Furthermore, the researcher identified, through the in-depth interviews, the South Korean and German journalists' perception of their governments' influence and the reasons/backgrounds, that is, the perception of their media environment. As a result, it was confirmed that the perceptions of journalists from each country converge to one side: in South Korea, "The government exerted control over the press" and in Germany, "The government had an influence on the press". It was understood that those perceptions stem from the awareness of problems such as the government's hold over public broadcasters and political influence over public broadcasters, respectively.

Although a common perception was drawn from many journalists, it is the opinion of a few people and therefore the researcher acknowledges that the media environment they perceived cannot be generalized to the real media environment of their country. Besides, since there is a difference in perception depending on journalists' personal careers and direct/indirect experiences, and especially because perception is literally 'subjective', there is a limit to objectifying the perceptions.

However, as media workers and experts, their perception of the media environment can be a meaningful hint to infer the actual media environment. In other words, their perception (either 'influence' or 'control') of their government's influence, and the reasons/backgrounds for such perception could lead to problem-posing by demonstrating the awareness of the problems of their media environment. Thus, it is important in that it can be the starting point for the pursuit of improvement—the foundation of the willingness to improve.

In conclusion, the findings of this study are meaningful in that it can provide a foundation for discussing the direction to improve the existing media environment of the two countries based on qualitative analysis, unlike the degrees of press freedom (Press Freedom Index) of countries around the world which international non-governmental organizations such as Freedom House and Reporters Without Borders annually publish through quantitative analysis. Furthermore, for the application of the study results, it is necessary to pay attention to and care about the reasons/backgrounds for the journalists' perceptions, rather than their perceptions themselves such as 'influence' or 'control'.

Meanwhile, this study overlooked the transformed forms of government influence, focusing on the governments' explicit influence on the press—that is, the cases that are known to the outside world and are easily recognizable. Although it was anticipated that government influence on the press would evolve day by day with persistence and permanence and be exerted in a transformed form, the analysis of that aspect was insufficient.

As mentioned in Part 2.5 'Review of Existing Studies', there has been a rise of economic press control by capital power, and its transformation has led to the emergence of a new form of press control that combines political and economic (capital) powers. However, as this study was focused on political (governmental) influence in terms of the research topic, identifying the transformed forms of government influence was set aside.

In fact, when political and economic (capital) powers are combined and exerted on the press in a transformed form, it is more difficult to determine which cases correspond to what as well as to ascertain the facts about such cases compared to the general form of government influence. That point leads to the very limitation of this study. US journalism scholar Leonard R. Sussman (1989, p. 189) already delivered a warning message thirty years ago that all media companies (journalists) were being pressured by capital power, based on the results of a survey targeting journalists from countries around the world. He stated that commercial pressures on the press occurred half as frequently as political influences in countries with freedom and were twice as strong in countries without freedom as in countries with freedom. However, since economic press control by capital power comes into action subtly, it is difficult to collect relevant cases and hence it is deemed that Sussman also had no choice but to indirectly identify the influence of economic (capital) power over the press through a survey.

As the so-called 'Media Politics'—which means using media for politics—deepens, government influence on the press is also expected to increasingly evolve in various ways. Also, it is viewed to expand to social and online

media such as SNS as well as mass media. Freedom House (2011, p. 21) formerly stated that control over new means of news dissemination, particularly internet-based social media, has become a priority for authoritarian governments. And it pointed to South Korea as the country concerned, mentioning that some democratic and semi-democratic countries have moved to implement additional controls over the internet.

Thus, a study of the transformed form of government influence, which combines political and economic (capital) powers, is deemed to be necessary in the future although it has inherent limitations as a research topic. Furthermore, it is necessary to carry out a weighty investigation on government influence over social and online media.

In addition, since the research objects are limited to South Korea and Germany, there is a limit to the fact that this study cannot provide the big picture on the tendencies of government influence on the press in democratic countries around the world. In a word, the results of this study cannot be widely applied or generalized to other democratic countries.

This study took two countries as the research objects: South Korea, recognized as one of the advanced countries with considerable democratization in Asia; Germany, an advanced democratic country in Europe with the highest level of press freedom—in terms of Press Freedom Status or Index—among countries that belong to the world leading group. And this study grasped the tendencies of the government's influence on the press in each country and journalists' perceptions of their media environment. They were also compared and analyzed. On the basis of the study results, it can be said that the substance of government influence on the press in democratic countries was confirmed; however, since it was found that each country's unique system (including media governance) and political and economic factors affect tendencies of government influence through South Korean and German journalists' perceptions of their media environment, it is difficult to apply the tendencies of the governments' influence on the press, which appeared in the two countries, to other democracies.

Besides, in order to concentrate on the period during which government influence on the press had been frequently exposed, and because of external factors beyond control, the period scope of the study case was restricted when gathering cases—in other words, the cases that occurred since 2000 were collected. Therefore, there is a limit to making various interpretations regarding the study results. This is an inherent limitation that originates in the fact that this study is not a longitudinal study, but a cross-sectional one.

In the case of South Korea, the case study was conducted focusing on the period of two conservative regimes of Lee Myung-bak (2008-2013) and Park Geun-hye (2013-2017) under which government influence on the press was most prominent in the 21st century. As such, the circumstances after the regime change through the inauguration of President Moon Jae-in in May 2017, were not reflected in the case study. In the case of Germany, as the existing ruling party (CDU/CSU Union) won the federal election for the Bundestag (Bundestagswahl) which was held in September 2017, Chancellor Angela Merkel succeeded in being elected for the fourth term, and therefore, the case study was made only on the government's influence that was implemented or exposed during the Merkel administration (from Nov. 2005 to the present). Thus, it is not possible to grasp the change in the tendencies of government influence on the press depending on individual regimes within a country through the study results. To identify the change, continuous monitoring of the governments' influence on the press in South Korea and Germany and updating its tendencies are necessary.

Finally, in terms of study methodology, the researcher alone gathered study cases with a convenience sampling method among non-probability sampling methods; thus, the researcher acknowledges that it is not possible to guarantee 100% objectivity in the case collection and that such limitation could have been reflected in the results of the case study.

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Appendix 1: Typology of government control over the press: 7 categories, established by classifying press controls reported in 61 countries in 1951-1960

Nixon, R. B. (1960). Factors Related to Freedom In National Press Systems. *Journalism quarterly*, 37(1), 13-28. See pp. 18-19.

- 1) Control through punitive action, legal and extra-legal, other than that covered by statutes against libel and obscenity. This includes civil and criminal action, arrests, detention, jail sentences, fines and deportation. Such action was recorded only if it discriminated against the journalist, such as through the law of *desacato* (“disrespect toward authority”) found in most South American countries. Such a law typifies public security measures used to control journalists considered “dangerous to public order.”
- 2) Control of a publication’s existence or very life through such action as a) seizure of newspapers, b) restriction of newsprint and other supplies, and C) permission to publish only under favorable government disposition.
- 3) Control of official news through governmental attitude toward official news releases (*i.e.*, that such news must be published without change) or through limited access to governmental news.
- 4) Control of newspaper personnel, either by direct approval or by appointment of staffs or punishment or censure.
- 5) Control through official censorship, either through overt censorship organs or by police or police-like actions. The existence of an office of censorship was considered control through threat even in cases where relatively little activity was reported.
- 6) Control of periodical content or format, ranging all the way from complete planning and policy control to pressures exerted to restrict ideological “wandering.”
- 7) Control of periodical distribution, either directly or indirectly.

Appendix 2: Criteria for PICA (Press Independent and Critical Ability)

- According to the expression in 1967, “23 factors selected for the PICA survey on the basis of their overall inclusiveness and comparability”
- According to the expression in 1970, “23 factors selected for measuring press freedom on the basis of their overall inclusiveness and comparability”

Lowenstein, R. L. (1967). *Measuring World Press Freedom as a Political Indicator* (PhD diss.). Columbia: University of Missouri. See pp. 51-53.

Lowenstein, R. L. (1970). Press Freedom as a Political Indicator, pp. 129–140 in Fisher, H. D., & Merrill, J. C. (Eds.). *International Communication: Media, Channels, Functions*. New York: Hastings House. See pp. 131-132.

1. Legal controls on the press, not including libel and obscenity laws (but including laws involving official censorship, contempt, forced corrections and retractions, suspension, privacy, security, incitement to riot, etc.).
2. Extra-legal controls (threats, violence, imprisonment, confiscation, etc.).
3. Libel laws.
4. Organized self-regulation (press councils, courts of honor).
5. News and editorial personnel (all media) subject to government licensing, certification and appointment.
6. Favoritism in release of government news.
7. Media allowed to utilize services of foreign news agencies.
8. Government control over domestic news agencies.
9. Print media subject to government licensing.
10. Government control of circulation and distribution, not including postal service.
11. Degree of press criticism of local and regional governments and officials within country.
12. Degree of press criticism of national government and national officials within country.
13. Government or "government party" ownership of media (including radio, television and domestic news agencies).
14. Publications of opposition political parties banned.
15. Broadcasting and press units owned by networks and chains (concentrated ownership).
16. Government control of newsprint.
17. Government control of foreign exchange and/or purchase of press equipment.
18. Government subsidies and/or bribes to press and newsmen.
19. Government loans to media.
20. Media dependency on government advertising.
21. Tax rate on press (either higher or lower) as compared to other businesses.
22. Pressure from labor unions (to influence editorial policy, to suspend publication).
23. Number of marginal (economically insecure) press units.

Appendix 3: 15 press freedom variables related to government pressures on the press

- The data for this study were taken from Lowenstein's 1966 PICA survey of World Press Freedom, though modified considerably. The original form of the data was that found in Lowenstein's Ph.D. dissertation.
- After deletion of variables not related to government pressures on the press in Lowenstein's PICA data by Kent, 15 remained.

Kent, K. E. (1972). Freedom of the press: An empirical analysis of one aspect of the concept. *Gazette*, 18(2), 65-75. See pp. 69-70 and 75.

1. Libel laws.
2. Government control of foreign exchange and/or purchase of mass media equipment abroad.
3. Print media subject to government licensing.
4. Mass media dependency on government advertising.
5. Government or "government party" ownership of mass media.
6. Government infringement of mass media utilization of the services of foreign news agencies.
7. Government subsidies and/or bribes to mass media and newsmen.
8. Government control of newsprint.
9. Tax rate on mass media different from that applied to other businesses.
10. Government control over domestic news agencies.
11. Favoritism in release of government news to the mass media.
12. Publications of opposition political parties banned.
13. News and editorial personnel of the mass media subject to government licensing, certification, and appointment.
14. Government loans to mass media.
15. Government control of circulation and distribution of print mass media, not including postal service.

APPENDIX A: PICA VARIABLES DELETED FOR THIS STUDY

Reason for deletion

Variable

- | | |
|--|--|
| 1. Do not deal with direct government pressures on the press | 1. Organized self-regulation by the mass media.
2. Wide ownership of mass media by networks and chains.
3. Pressure on mass media from labor unions.
4. Large number of economically insecure mass media units. |
| 2. Deal with possible results of government pressures on the press, rather than the pressures themselves | 1. Little mass media criticism of local and regional governments and officials.
2. Little mass media criticism of national government and officials. |
| 3. Too vague and general; do not deal with specific types of government pressures on the press | 1. Legal controls on the mass media, not including libel and obscenity laws.
2. Extra-legal controls on the mass media, not including types specified in other variables. |

Appendix 4: Methodology Questions included in *Freedom of the Press* published by Freedom House

Freedom House. (n.d.). Freedom of the Press Research Methodology. Accessed August 6, 2020, from <https://freedomhouse.org/freedom-press-research-methodology>

Methodology

Through the years, we have refined and expanded our methodology. Recent modifications have aimed to capture changes in the news and information environment without altering the comparability of data since the project's inception. For example, the methodology was modified to incorporate the role of digital media.

The level of press freedom in each country and territory is evaluated through 23 methodology questions divided into three broad categories: the legal environment, the political environment, and the economic environment. For each methodology question, a lower number of points is allotted for a more free situation, while a higher number of points is allotted for a less free environment. A country or territory's final score (from 0 to 100) represents the total of the points allotted for each question. A total score of 0 to 30 results in a press freedom status of Free; 31 to 60 results in a status of Partly Free; and 61 to 100 indicates a status of Not Free.

The diverse nature of the methodology questions seeks to address the varied ways in which pressure can be placed on the flow of information and the ability of print, broadcast, and digital media to operate freely and without threat of repercussions. In short, we seek to provide a picture of the entire "enabling environment" in which the media operate. We also assess the diversity of the news and information available to the public in any given country or territory, from either local or transnational sources. Freedom of the Press is focused on the ability to provide and access news and information. It generally pertains to journalists and formal news outlets, whether print, broadcast, or online, but also includes less formal sources—such as blogs, social media, and text messages—when they serve as de facto news providers.

The **legal environment** category encompasses an examination of both the laws and regulations that could influence media content, and the extent to which they are used in practice to enable or restrict the media's ability to operate. We assess the positive impact of legal and constitutional guarantees for freedom of expression; the potentially negative aspects of security legislation, the penal code, and other statutes; penalties for libel and defamation; the existence of and ability to use freedom of information legislation; the independence of the judiciary and official regulatory bodies; registration requirements for both media outlets and journalists; and the ability of journalists' organizations to operate freely.

Under the **political environment** category, we evaluate the degree of political influence in the content of news media. Issues examined include the editorial independence of both state-owned and privately owned outlets; access to information and sources; official censorship and self-censorship; the vibrancy of the media and the diversity of news available within each country or territory; the ability of both foreign and local reporters to cover the news in person without obstacles or harassment; and reprisals against journalists or bloggers by the state or other actors, including arbitrary detention, violent assaults, and other forms of intimidation.

Our third category examines the **economic environment** for the media. This includes the structure of media ownership; transparency and concentration of ownership; the costs of establishing media as well as any impediments to news production and distribution; the selective withholding of advertising or subsidies by the state or other actors; the impact of corruption and bribery on content; and the extent to which the economic situation in

a country or territory affects the development and sustainability of the media.

Methodology Questions and Bulleted Guidelines

A. LEGAL ENVIRONMENT (0–30 POINTS)

1. Do the constitution or other basic laws contain provisions designed to protect freedom of the press and of expression, and are they enforced? (0–6 points)

- Does the constitution contain language that provides for freedom of speech and of the press?
- Do the Supreme Court, attorney general, and other representatives of the higher judiciary support these rights?
- Does the judiciary obstruct the implementation of laws designed to uphold these freedoms?
- Do other high-ranking state or government representatives uphold legal protections for media freedom?
- Do high-level government leaders contribute to a hostile environment for the press, for example by engaging in repeated animosity toward or negative verbal rhetoric against the media?
- Are crimes that threaten press freedom prosecuted vigorously by authorities?
- Is there implicit impunity for those who commit crimes against journalists?

2. Do the penal code, security laws, or any other laws restrict reporting and are journalists or bloggers punished under these laws? (0–6 points)

- Are there restrictive press laws?
- Do laws restrict reporting on ethnic or religious issues, national security, or other sensitive topics?
- Are penalties for “irresponsible journalism” applied widely?
- Are restrictions on media freedom clearly defined, narrowly circumscribed, and proportional to a legitimate aim?
- Do the authorities restrict or otherwise impede legitimate press coverage in the name of national security interests?
- Are journalists or media owners regularly prosecuted or jailed as a result of what they write or broadcast?
- Are writers, commentators, or bloggers subject to imprisonment or other legal penalty for accessing or posting material on the internet?
- Is there excessive pressure on journalists to reveal sources, resulting in punishments such as jail sentences, fines, or contempt of court charges?

3. Are there penalties for libeling officials or the state and are they enforced? (0–3 points)

- Are public officials specially protected under insult or defamation laws?
- Are insult laws routinely used to shield officials’ conduct from public scrutiny?
- Is truth a defense to libel charges?
- Is there a legally mandated “right of reply” that overrides independent editorial control?
- Is libel a criminal rather than merely a civil offense?
- Are journalists or other news providers prosecuted and jailed for libel or defamation?
- Are excessive monetary fines routinely imposed on journalists or media outlets in civil libel cases in a partisan or prejudicial manner, with the intention of bankrupting the media outlet or deterring future criticism?

4. Is the judiciary independent and do courts judge cases concerning the media impartially? (0–3 points)

- Are members of the judiciary subject to excessive pressure from the executive branch?
- Are the rights to freedom of expression and information recognized as important among members of the judiciary?
- When judging cases concerning the media, do authorities act in a lawful and non-arbitrary manner on the basis of objective criteria?
- Are contempt of court charges filed against journalists who attempt to cover court proceedings or cases?
- Does the judiciary frequently impose gag orders or bans on coverage of legal cases?

5. Is Freedom of Information legislation in place and are journalists able to make use of it? (0–2 points)

- Are there laws guaranteeing access to government records and information? Is there enabling legislation and/or an administrative framework in place to make such laws usable in practice?
- Are restrictions to the right of access to information expressly and narrowly defined?
- Are journalists able to secure public records through clear administrative procedures in a timely manner and at a reasonable cost?
- Are public officials subject to prosecution if they illegally refuse to disclose state documents?

6. Can individuals or business entities legally establish and operate private media outlets without undue interference? (0–4 points)

- Are registration requirements to publish a newspaper or periodical unduly onerous or are they approved/rejected on partisan or prejudicial grounds?
- Is the process of licensing private broadcasters and assigning frequencies open, objective, and fair?
- Is there an independent regulatory body responsible for awarding licenses and distributing frequencies, or does the state control the allocation process?
- Does the state place extensive legal controls on the establishment of websites and ISPs?
- Do state or publicly funded media receive preferential legal treatment?
- Are nonprofit community broadcasters given distinct legal status?
- Are laws regulating media ownership impartially implemented?

7. Are media regulatory bodies, such as a broadcasting authority or national press or communications council, able to operate freely and independently? (0–2 points)

- Are there explicit legal guarantees protecting the independence and autonomy of any regulatory body from either political or commercial interference?
- Does the state or any other interest exercise undue influence over regulatory bodies through appointments or financial pressure?
- Is the appointments process to such bodies transparent and representative of different interests, and do representatives from the media have an adequate presence on such bodies?
- Are decisions taken by the regulatory body seen to be fair and apolitical?
- Are efforts by journalists and media outlets to establish self-regulatory mechanisms permitted and encouraged, and viewed as a preferable alternative to state-imposed regulation?

8. Is there freedom to become a journalist and to practice journalism, and can professional groups freely support journalists' rights and interests? (0–4 points)

- Are journalists required by law to be licensed, and if so, is the licensing process conducted fairly and at reasonable cost?
- Must a journalist become a member of a particular union or professional organization in order to work

legally?

- Must journalists have attended a particular school or have certain qualifications in order to practice journalism?
- Are visas or exit permits for journalists to travel abroad delayed or denied based on the individual's reporting or professional affiliation?
- Are journalists' or bloggers' professional actions or means of communication subject to either electronic or physical surveillance with the object of interfering in their work or ascertaining their sources?
- May journalists and editors freely join associations to protect their interests and express their professional views?
- Are independent journalists' organizations and other advocacy groups dedicated to their interests able to operate freely and comment on threats to or violations of press freedom?

B. POLITICAL ENVIRONMENT (0–40 POINTS)

1. To what extent are media outlets' news and information content determined by the government or a particular partisan interest? (0–10 points)

- To what degree are journalists subject to editorial direction or pressure from the authorities or from private owners?
- Is hiring, promotion, and firing of journalists done in a nonpartisan and impartial manner? Are journalists subject to job loss because of what they write or broadcast?
- Is media coverage excessively partisan, with the majority of outlets consistently taking either a pro- or antigovernment line?
- Does the government have editorial control over state-run media outlets, or is there a public-service broadcaster that enjoys editorial independence?
- Does the opposition have access to state-owned media, particularly during election campaigns? Do state-owned outlets reflect the views of the entire political spectrum or do they provide only an official point of view?
- Does the government attempt to influence or manipulate online content, for example through propaganda sites, paid commentators, or bots on social media?

2. Is access to official or unofficial sources generally controlled? (0–2 points)

- Are the activities of government and other public institutions open to the press?
- Is there a "culture of secrecy" among public officials that limits their willingness to communicate with or grant access to journalists?
- Do authorities hold regular press conferences or other briefings to inform the media?
- Is access to officials granted equitably to all journalists regardless of their media outlet's editorial line?
- Does the government influence or restrict access to unofficial sources (parties, unions, religious groups, etc.), particularly those that provide opposition viewpoints?

3. Is there official or unofficial censorship? (0–4 points)

- Is there an official censorship body?
- Are publications or broadcast programs subject to pre- or postpublication censorship?
- Are outlets forcibly closed or taken off the air as a result of what they publish or broadcast?
- Are online news outlets, social-media platforms, specific webpages, or pieces of content blocked, filtered, or taken down, either by the authorities or by intermediaries under official pressure?

- Is access to foreign news sources censored or otherwise restricted?
- Are certain contentious issues—such as official corruption, the role of the armed forces or the political opposition, human rights, or religion—officially off-limits to the media?
- Do authorities issue official guidelines or directives on coverage to media outlets?

4. Do journalists practice self-censorship? (0–4 points)

- Is there widespread self-censorship in the state-owned media? In the privately owned media?
- Are there unspoken rules that prevent a journalist from pursuing certain stories?
- Is there avoidance of subjects that can clearly lead to censorship or harm to the journalist or the institution?
- Is there censorship of or excessive interference in journalists' stories by editors or managers?
- Are there restrictions on coverage by “gentlemen’s agreement,” club-like associations between journalists and officials, or traditions in the culture that restrict certain kinds of reporting?

5. Do people have access to media coverage and a range of news and information that is robust and reflects a diversity of viewpoints? (0–4 points)

- Does the public have access to a diverse selection of print, broadcast, and internet-based sources of information that represent a range of political and social viewpoints?
- Are people able to access a range of local and international news sources despite efforts to restrict the flow of information?
- Do media outlets represent diverse interests within society, for example through community radio or other locally focused news content?
- Do providers of news content cover political developments and provide scrutiny of government policies or actions by other powerful societal actors?
- Is there a tradition of vibrant coverage of potentially sensitive issues?
- Do journalists or bloggers pursue investigative news stories on issues such as corruption by the government or other powerful societal actors?
- **NOTE:** When scoring this question, please take into account the level of penetration of different types of media, e.g., print, broadcast, internet, foreign.

6. Are both local and foreign journalists able to cover the news freely and safely in terms of physical access and on-the-ground reporting? (0–6 points) [*Note: this question applies to conditions experienced by journalists, bloggers, or media outlets *during the course of their work*. See also note in B7.]

- To what extent are journalists harassed or attacked while attempting to gather news or cover events in person?
- Are certain geographical areas of the country off-limits to journalists?
- Does a war, insurgency, or similar situation in a country inhibit the operation of media?
- Do authorities require journalists working in danger zones to be “embedded”?
- Is there surveillance of foreign journalists working in the country?
- Are foreign journalists inhibited or barred by the need to secure visas or permits to report from or travel within the country?
- Are foreign journalists deported for reporting that challenges the authorities or other powerful interests?

7. Are journalists, bloggers, or media outlets subject to extralegal intimidation or physical violence by state authorities or any other actor as a result of their reporting? (0–10 points) [*Note: This question applies to conditions experienced by journalists, bloggers, or media outlets *as a result of their work*. See also note

in B6.]

- Are journalists or bloggers subject to murder, injury, harassment, threats, abduction, arbitrary arrest and illegal detention, or torture in retaliation for their professional activities?
- Do journalists face reprisals in the form of trumped-up criminal charges with no explicit link to their work, such as weapons possession, drug possession, or tax evasion?
- Do armed militias, organized crime, insurgent groups, political or religious extremists, or other organizations regularly target journalists in response to their work?
- Have journalists fled the country or gone into hiding or exile to avoid such repercussions?
- Do journalists under threat from nonstate actors receive adequate protection from state authorities?
- Have media companies been targeted for physical attack or for the confiscation or destruction of property?
- Are there technical attacks—such as hacking or distributed denial-of-service (DDoS) attacks—on news outlets’ websites or on social-media accounts that are used to disseminate news?

C. ECONOMIC ENVIRONMENT (0–30 POINTS)

1. To what extent are media owned or controlled by the government, and does this influence their diversity of views? (0–6 points)

- To what extent do state-owned media dominate the country’s news and information system?
- Does the state have a monopoly on any news medium?
- Are there privately owned print, broadcast, or internet-based media outlets that carry their own news content?
- Do private news agencies provide content for print, broadcast, and online media?
- Do the state or public media enjoy editorial independence, and do they provide a range of diverse, nonpartisan viewpoints?
- **NOTE:** Consideration in the scoring should be given to the state/private balance in each medium, so that a country receives credit for a privately owned print sector, for example, even if there is a state monopoly on radio or television.

2. Is media ownership transparent, thus allowing consumers to judge the impartiality of the news? (0–3 points)

- Is it possible to ascertain the ownership structure of private media outlets?
- Do media owners hold official positions in the government or in political parties, and are these links intentionally concealed from the public?
- Do the formal owners of media outlets have unofficial ties to other powerful actors that compromise the outlets’ objectivity?

3. Is media ownership highly concentrated and does this influence diversity of content? (0–3 points)

- Are many news outlets owned or controlled by a few industrial or commercial conglomerates, whose resources allow them to suppress competition, limit diversity of content or viewpoints, and dominate the media landscape?
- Is there an excessive concentration of media ownership in the hands of private interests linked to state patronage or that of other powerful societal actors?
- Are there media monopolies, significant vertical integration (control over all aspects of news production and distribution), or substantial cross-ownership?
- Does the state actively and fairly enforce laws that limit concentration, monopolies, and cross-ownership?

4. Are there restrictions on the means of news production and distribution? (0–4 points)

- Is there a monopoly on the means of production and distribution, such as newsprint supplies, internet service, or telecommunications infrastructure?
- Are there private and nonstate printing presses?
- Are distribution intermediaries (newspaper kiosks, transmitters, cable and satellite companies, internet service providers, mobile-phone carriers) able to operate freely?
- Does the government exert pressure on independent media through the control of distribution facilities?
- Is there seizure or destruction of copies of newspapers, radio or television transmitters, satellite dishes, or production equipment?
- Do the authorities engage in wholesale blackouts of internet or mobile service, or interfere with such service through deliberate throttling and artificially slow connections?
- Does geography or poor infrastructure (roads, electricity, etc.) limit dissemination of print, broadcast, internet, or mobile-based news sources throughout the country?

5. Are there high costs associated with the establishment and operation of media outlets? (0–4 points)

- Are there excessive fees associated with obtaining a radio frequency, registering a newspaper, or establishing an ISP or website?
- Are the costs of purchasing paper, newsprint, or broadcasting equipment subject to high additional duties?
- Are media outlets subject to excessive taxation or other levies compared with other industries?
- Are there restrictions on foreign investment or non-investment foreign support/funding in the media?

6. Do the state or other actors try to control the media through allocation of advertising or subsidies? (0–3 points)

- Are state subsidies for privately run newspapers, broadcasters, or websites allocated fairly?
- Do subsidies from private owners distort the market, or are they intended to drive the competition out of business?
- Is government advertising allocated fairly and in an apolitical manner, i.e., on the basis of market share?
- Do state or private advertisers use the threat of reduced ad spending or actual boycotts to influence editorial decisions?
- Do the authorities or nonstate actors pressure companies to withhold advertising from certain media outlets?

7. Do journalists, bloggers, or media outlets receive payment from private or public sources whose design is to influence their journalistic content? (0–3 points)

- Do government officials or other actors pay journalists in order to cover or to avoid certain stories?
- Do journalists or media outlets accept payment to produce certain types of coverage (i.e. sponsored content, native advertising), and if so, do they clearly and lawfully identify such content?
- Are journalists often bribed?
- Are pay levels for journalists and other media professionals sufficiently high to discourage bribery?
- Do journalists or media outlets request bribes or other incentives in order to produce or withhold certain stories?

8. Does the overall economic situation negatively impact media outlets' financial sustainability? (0–4 points)

- Are media overly dependent on the state, political parties, big business, or other influential political actors for funding?

- Is the economy so depressed or so dominated by the state that a private entrepreneur would find it difficult to create a financially sustainable news outlet?
- Is it possible for independent news outlets to remain financially viable primarily by generating revenue from advertising or subscriptions?
- Do foreign investors or donors play an unusually large role in helping to sustain media outlets?
- Are private owners subject to intense commercial pressures and competition, causing them to tailor or cut news coverage in order to remain financially viable?

Appendix 5: 4 Muster der massenmedialen Politikvermittlung im Wahlkampf

Plasser, F., Sommer, F., & Scheucher, C. (1996). Medienlogik: Themenmanagement und Politikvermittlung im Wahlkampf, pp. 85-118 in Plasser, F., Ulram, P. A., & Ogris, G. (Hrsg.). *Wahlkampf und Wählerentscheidung: Analysen zur Nationalratswahl 1995*. Wien: Signum. See p. 90.

- a) „Die Tendenz zur hochgradigen *Personalisierung* der Berichterstattung. Politisches Star-System und Wahlen als Personal-Plebiszite sind die Stichworte für eine redaktionelle Logik, die Politik primär als „Spiel zwischen Personen“ und den politischen Wettbewerb als personalisierte Elitenkonkurrenz definiert.
- b) Die Tendenz zur *Dethematisierung*. Im Verlauf des Wahlkampfes treten inhaltliche Streitfragen und Positionen zunehmend in den Hintergrund und werden durch Analysen der Wahlkampfstrategie, Auseinandersetzungen mit stilistischen Fragen wie der TV-Performance der Spitzenkandidaten bzw. Koalitionsspekulationen abgelöst.
- c) Die Tendenz zum *Negativismus*. Affären, Skandale und Fehlleistungen wie ein unverkennbar elitenkritischer Tenor entsprechen den redaktionellen Nachrichtenwerten besser als die Auseinandersetzung mit inhaltlich-programmatischen Positionen. Der Hang einzelner Spitzenakteure zum *negative campaigning*, d.h. einen auf Angriff und Attacke eingestellten Wahlkampfstil und der „eingebaute“ Negativismus der Wahlkampfberichterstattung verstärken sich somit wechselseitig und kolorieren das Wahlkampfgeschehen (Patterson 1993 und 1996).
- d) Die Tendenz zur *sportlichen Dramatisierung*. Exzessiver Einsatz von Umfragedaten und die spekulative Kommentierung demoskopischer Datensplitter sollen im Sinn des redaktionellen Dramatisierungsbedarfs für Spannung und *exitement* sorgen. Diese Spielart des „horse race journalism“ ist längst nicht mehr auf die Vereinigten Staaten beschränkt. Der „*precision journalism*“ ist mittlerweile auch in Westeuropa zu einem prominenten Genre der Wahlkampfberichterstattung geworden“ (Plasser/Scheucher/Sommer 1995, 228f.; Schmitt-Beck 1996).

Appendix 6: Tool for case screening (Source: Appendix 4. ‘Methodology Questions’ of Freedom House)

Check-list with questions to identify what the South Korean government exerted on the press	South Korean Case No.																			
	1-1	1-2	1-3	1-4	3-1	3-2	3-3	3-4	4-1	4-2	4-3	4-4	4-5	4-6	5-1	5-2	5-3	5-4	5-5	5-6
1. Do the constitution or other basic laws contain provisions designed to protect freedom of the press and of expression, and are they enforced?																				
2. Do the penal code, security laws, or any other laws restrict reporting and are journalists or bloggers punished under these laws?																				
3. Are there penalties for libeling officials or the state and are they enforced?	√	√																		
4. Is the judiciary independent and do courts judge cases concerning the media impartially?																				
5. Is Freedom of Information legislation in place and are journalists able to make use of it?																				
6. Can individuals or business entities legally establish and operate private media outlets without undue interference?																				
7. Are media regulatory bodies, such as a broadcasting authority or national press or communications council, able to operate freely and independently?		√	√	√	√	√	√	√												
8. Is there freedom to become a journalist and to practice journalism, and can professional groups freely support journalists’ rights and interests?																				
9. To what extent are media outlets’ news and information content determined by the government or a particular partisan interest?			√	√					√	√	√	√	√	√						
10. Is access to official or unofficial sources generally controlled?																				
11. Is there official or unofficial censorship?																				
12. Do journalists practice self-censorship?															√	√	√	√	√	√
13. Do people have access to media coverage and a range of news and information that is robust and reflects a diversity of viewpoints?	√		√	√					√	√	√	√	√	√	√	√	√	√		√
14. Are both local and foreign journalists able to cover the news freely and safely in terms of physical access and on-the-ground reporting?																				
15. Are journalists, bloggers, or media outlets subject to extralegal intimidation or physical violence by state authorities or any other actor as a result of their reporting?	√																			
Check-list to secure reliability	South Korean Case No.																			
	1-1	1-2	1-3	1-4	3-1	3-2	3-3	3-4	4-1	4-2	4-3	4-4	4-5	4-6	5-1	5-2	5-3	5-4	5-5	5-6
Official recognition of (apology for) conduct by the government				√									√	√						
Victim’s disclosure of facts of the damage caused by government conduct	√	√	√	√		√	√	√	√	√	√	√	√		√	√	√	√	√	√
Public criticism of government conduct or media response by third parties such as other media companies, media/civic organizations and the public	√	√			√	√	√	√	√	√	√	√		√	√	√	√	√	√	√

Check-list with questions to identify what the German government exerted on the press	German Case No.																			
	1-1	1-2	1-3	1-4	1-5	1-6	1-7	1-8	1-9	1-10	1-11	1-12	2-1	3-1	4-1	4-2	4-3	5-1	5-2	5-3
1. Do the constitution or other basic laws contain provisions designed to protect freedom of the press and of expression, and are they enforced?																				
2. Do the penal code, security laws, or any other laws restrict reporting and are journalists or bloggers punished under these laws?									√											
3. Are there penalties for libeling officials or the state and are they enforced?																				
4. Is the judiciary independent and do courts judge cases concerning the media impartially?																				
5. Is Freedom of Information legislation in place and are journalists able to make use of it?																				
6. Can individuals or business entities legally establish and operate private media outlets without undue interference?					√															
7. Are media regulatory bodies, such as a broadcasting authority or national press or communications council, able to operate freely and independently?												√	√							
8. Is there freedom to become a journalist and to practice journalism, and can professional groups freely support journalists' rights and interests?																				
9. To what extent are media outlets' news and information content determined by the government or a particular partisan interest?		√		√			√				√				√	√	√			
10. Is access to official or unofficial sources generally controlled?								√												
11. Is there official or unofficial censorship?																				
12. Do journalists practice self-censorship?				√														√	√	√
13. Do people have access to media coverage and a range of news and information that is robust and reflects a diversity of viewpoints?				√	√			√	√	√		√						√	√	√
14. Are both local and foreign journalists able to cover the news freely and safely in terms of physical access and on-the-ground reporting?	√		√			√	√					√								
15. Are journalists, bloggers, or media outlets subject to extralegal intimidation or physical violence by state authorities or any other actor as a result of their reporting?																				
Check-list to secure reliability	German Case No.																			
	1-1	1-2	1-3	1-4	1-5	1-6	1-7	1-8	1-9	1-10	1-11	1-12	2-1	3-1	4-1	4-2	4-3	5-1	5-2	5-3
Official recognition of (apology for) conduct by the government							√		√		√									
Victim's disclosure of facts of the damage caused by government conduct	√			√	√		√		√		√		√	√	√	√	√			
Public criticism of government conduct or media response by third parties such as other media companies, media/civic organizations and the public	√	√	√		√	√		√	√		√	√	√	√	√	√	√	√	√	√

Appendix 7: Evidential material on six cases of South Korean self-censorship

Woo, Won-sik et al. (2017, Sep. 15). *A written request for a parliamentary investigation to find out the truth about the events of deep-rooted evils in the press during the Lee Myung-bak and Park Geun-hye governments* (Bill No. ZZ20081). National Assembly of the Republic of Korea.

Accessed August 9, 2020, from

http://likms.assembly.go.kr/bill/billDetail.do?billId=PRC_K1L7N0X9L1T5S1N4B2Y1G1B8Y1N9D7

이명박·박근혜 정부의 방송장악 등 언론적폐사건 진상규명을 위한 국정조사 요구서

요구연월일 : 2017. 9. 15.

요 구 자 : 우원식 의원 외 120인

(excerpted from reference)

3. 조사할 사안의 범위

6. MBC 김재철 전 사장이 이명박 정권에 대해 비판적인 방송 프로그램인 ‘후플러스’ 폐지한 사건에 대한 진상 규명

7. 2010년 8월17일 밤 8시30분경, MBC 김재철 전 사장은 당일 방송 예정이던 PD수첩 ‘4대강 수심 6m의 비밀’ 편에 대해 ‘비밀탐’의 존재여부, 동지상고 및 영포회 출신 청와대 행정관이 비밀탐에 존재했는지 여부 등에 대한 사실 확인을 해야 한다는 점 등을 들어 사전 검열에 해당하는 사전 시사 요구에 제작진이 불응하자 일방적으로 ‘방송 보류’ 결정(국민의 지탄이 거세지자 결국 8월24일 방송함)한 사건에 대한 진상 규명

10. 2013년 6월23일 <시사매거진 2580>에서 국정원의 대선개입 관련 방송을 내보내겠다고 시청자에게 미리 홍보까지 한 상황에서 갑자기 해당 내용을 불방시킨 사건에 대한 진상 규명

13. MBC 뉴스 수뇌부는 ‘세월호 참사’ 당시 목표 MBC는 세월호 탑승객 전원 구조 속보가 오보라는 정보 보고를 했으나 목살했으며, 이후 MBC 경영진은 TV, 라디오의 각종 시사교양 프로그램에서 ‘세월호’ 관련 아이템을 불허하고, 관련 아이템을 추진했던 PD에게 R 등급을 주는 등 ‘세월호 참사’에 대한 각종 검열이 있었다는 의혹 사건

16. 전국언론노조 MBC 본부가 2017년 8월에 폭로한 ‘카메라기자 성향보고’에 따르면 MBC 경영진이 각 구성원을 노동조합에 대한 충성도, 경영진에 대한 태도, 정치성향 등을 토대로 이른바 “블랙리스트”를 작성하고, 이 블랙리스트에 따라 인사, 승진, 전보 등을 실시했다는 의혹에 대한 진상 규명

20. 2008년 11월, 정연주 전 사장을 불법적으로 몰아내고 등장한 이병순 전 사장이 MB정권에 비판적인 <시사투데이>, <미디어 포커스>에 대해 프로그램명과 방송시간대를 바꾸는 형식을 빌려 실질적으로 폐지한 사건에 대한 진상 규명

24. 2009년 1월16일, KBS 이병순 사장은 정연주 전 사장의 해임 관련 반대 투쟁을 벌인 양승동 ‘공영방송 사수를 위한 KBS 사원행동’ 공동대표와 김현석 대변인 파면, 성재호 기자 해고, 이상협 아나운서 정직 3개월 등의 징계(이후 양승동 대표와 김현석 기자에게 각각 정직 4개월, 성재호 기자에게는 정직 1개월로 징계 순위 낮춤)를 내린 것에 대한 진상 규명

36. YTN 사측이 ‘국정원의 박원순 시장 비하 SNS 글 2만 건 포착’이라는 특종 보도를 중단시킨 배후에 국정원이 관여했고, YTN에 대해 국정원이 조직적으로 감시 및 개입했다는 의혹에 대한 진상 규명

Appendix 8: Pressekodex (German Press Code)

Deutscher Presserat. (2017). Pressekodex (englische Fassung).

Accessed August 9, 2020, from

<https://www.presserat.de/en.html>

<https://www.presserat.de/pressekodex.html> (original version)

GERMAN PRESS CODE

Section 2 CARE

Research is an indispensable instrument of journalistic due diligence. The publication of specific information in word, picture and graphics must be carefully checked in respect of accuracy in the light of existing circumstances. Its sense must not be distorted or falsified by editing, title or picture captions. Unconfirmed reports, rumours or assumptions must be quoted as such.

Symbolic photos must be clearly marked as such.

GUIDELINE 2.4 INTERVIEWS

A verbatim interview is absolutely journalistically correct if it correctly relays what has been said. If the text of an interview is quoted in full or in part, the publication concerned must state its source. If the basic content of verbally expressed thoughts is paraphrased, it is nonetheless a matter of journalistic honour to state the source.

Section 8 PROTECTION OF THE PERSONALITY

The Press shall respect the private life of a person and his/her right to self-determination about personal information. However, if a person's behaviour is of public interest, it may be discussed by the Press. In the case of identifying reporting, the public interest in information must outweigh the interests worthy of protection of the persons involved; sensational interests alone do not justify identifying reporting. As far as an anonymization is required, it must be effective.

The Press guarantees editorial data protection.

GUIDELINE 8.1 CRIMINAL REPORTING

(1) The public has a legitimate interest in being informed about crimes, investigation proceedings and trials. It is the task of the Press to report on these issues.

(2) The Press shall only publish names, photographs and other information enabling the identification of suspects or perpetrators if the legitimate interest of the public outweighs the interests worthy of protection of the persons involved in the individual case. Factors that are to be taken into account in particular are: the intensity of the suspicion, the seriousness of the allegation, the state of proceedings, the suspect's or perpetrator's degree of fame, the suspect's or perpetrator's earlier behaviour and the intensity with which he/she seeks publicity. In general, a prevailing public interest may be assumed if:

- the crime in question is extremely serious or special in terms of its type and dimension;
- there is a connection resp. a contradiction between office, mandate, social role or function of a person and the action he/she is accused of;
- there is a connection between a famous person's position and the crime he/she is accused of or if the crime the person is accused of is contrary to his/her public image;
- a serious crime was committed publicly;
- an arrest warrant has been applied for by the investigating authorities.

If there are reasons to believe that a suspect is deemed to be incapable of committing a crime, the press shall refrain from identifying reporting.

(3) In the case of renewed reporting on criminal proceedings lying in the past, as a rule no name or picture of the perpetrator should be published in the interest of resocialisation. The resocialisation interest is all the greater, the longer the time period that has passed since the conviction.

(4) In the case of persons involved in the administration of justice, such as judges, prosecuting attorneys, lawyers and expert witnesses, identifying reporting is permissible as a rule if the persons in question are exercising their functions.

Publication of the names or photographs of witnesses is generally inadmissible.

GUIDELINE 8.3 CHILDREN AND YOUNG PEOPLE

In particular with regard to reporting on crimes and accidents, as a rule the identification of children and young people is inadmissible before completion of their 18th year.

Section 12 DISCRIMINATION

There must be no discrimination against a person because of his/her sex, a disability or his membership of an ethnic, religious, social or national group.

GUIDELINE 12.1 REPORTING ON CRIMES

When reporting on crimes, it must be ensured that any reference to a suspect's or perpetrator's membership of ethnic, religious or other minority groups does not result in a discriminatory generalisation of individual misconduct. As a rule, membership of a minority group shall not be mentioned, unless this is in the legitimate interest of the general public. In particular, it must be borne in mind that such references could stir up prejudices against minorities.

Appendix 9: Questions for in-depth interview

In order to understand the media environment related to the research topic in various aspects, the researcher created tailored questions in accordance with journalists' respective characteristics such as affiliation, rank and career. So, each of the questionnaires for interviewees was completed differently a bit. Therefore, the researcher presents the main questions asked to eight German interviewees—not common questions—from a macroscopic viewpoint.

<Personal questions>

- As a journalist, from when and where did you start to work?
- As a journalist, how long have(had) you worked? Please let me know the primary media which you worked for and job title.
- When you worked as a journalist or editor, have you ever directly/indirectly experienced or heard the government's infringement on press freedom? If so, could you briefly explain the event?

<Main questions>

The researcher presents analysis results for 20 cases in which the German government violated press freedom. Please give your opinion on each result and related questions.

Intention	Question (Based on case analysis results)
To identify journalists' perception of 'what' their government exerts on the press	A. type (way) B. main target C. approach and scope
To find grounds for such perception	D. partisanship of media E. pressure on media F. relation between media and political power
To grasp media environment factors responding to 'what' the government exerts	G. why be targeted or why not H. response depending on governance structures I. hindrance factor to press freedom

Question A. In Germany, a direct way is dominant in what the government exerted on the press: for example, restriction on coverage and reporting, surveillance to journalists, issuance of news guideline. The direct way was largely implemented in Nazi Germany (das Dritte Reich, 1933-1945) which used the press as a political tool.

- What do you think of the analysis result?
- Why does the German government still implement the direct way in the 21st century? What advantage does the direct way have?

Question B. As a result of the German case analysis, the government-influenced target is obviously public television. In this regard, a senior journalist who worked for decades at German public television denied my case analysis result and said as follows:

“What do you mean public television's obedience to the government? (It means the media fully accepts the government order.) Not in Germany. (Not in Germany?) No. Not in Germany. There are no political orders. (Have you ever experienced the government control?) No. Mechanisms are especially before the end of the Second World War Hitler regime where the press was controlled by the government. After the war, there was everybody who wanted free press to be installed. Because of that, they avoid anything which could be like a government control or political control of the press.”

- How should his answer be understood?
- Can you agree with his opinion? Or, do you have any different opinion?

Question C. The German government targeted not only media companies but individual journalists, which is a smaller unit than a press company. And the government surveilled even the foreign major press: since 1999, surveillance and intelligence-gathering by the German Federal Intelligence Service (BND) against the world's major press such as BBC, NYT and Reuters News Agency. Furthermore, the Act on Federal Intelligence Service (BND-Gesetz) was enacted to legalize domestic/foreign press surveillance (21.10.2016).

In conclusion, it can be said that the German government's surveillance of the press extensively implements through a microscopic approach.

- What do you think of the analysis result? Please give me your opinion to suit the reality of Germany.
- Have you ever heard from foreign journalists that the German federal government (or Bundespresseamt) sometimes controls/surveils/monitors foreign reporters? If so, please give a brief description of the specific case.

Question D. In May 2010, the federal government spokesman Ulrich Wilhelm, who had played a role as a mouth of Chancellor Merkel since 2005, applied for the Head of public television (Bayerischer Rundfunk), without resigning his position. Then, the BR broadcasting board (Rundfunkrat) overwhelmingly consented to appoint him as the Intendant (40 out of 44 votes). In March 2015, the board accepted to extend his five-year-term, so his term became ten years in total (1.2.2011-31.1.2021).

The researcher categorizes this 'Ulrich Wilhelm' case into a proxy way in what the government exerts on the press: South Korea also has many cases like this, which were obviously defined as a proxy way and have been called 'Parachute CEO appointment' and blamed.

The closest aide of powerful person was appointed as the Head of public media and therefore, he can lead a friendly broadcast to the government even though he was elected as the Intendant by the BR broadcasting board, not by Merkel.

- What do you think of categorizing this 'Ulrich Wilhelm' case into a proxy way?
- Unlike South Korea, Germans do not seem to consider this case as a serious problem. Is there any reason?

Question E. In November 2009, the term extension of Nikolaus Brender, editor-in-chief of public television ZDF, was frustrated. Although it is said to be the result by a decision of the ZDF administrative board (Verwaltungsrat), it is because board members belonging to the ruling party (CDU/CSU Union) opposed extending his term.

A vice-chairman (Roland Koch, CDU) of the board officially announced in advance that he would reject the request for the term extension of Nikolaus Brender who was unfavorable to the government, on the pretext of low news viewership. The board members belonging to the ruling party (CDU/CSU Union) voted to oppose Nikolaus Brender following the leader's will. This is obviously a case in which a public television is oppressed/controlled by the ruling party: taming a public television by the regime.

- What do you think of the analysis result?
- Do you think that this is a case of oppression/control over a public television by the ruling party? Or, do you have any different opinion?

Question F. The researcher has found few German private media cases targeted by the government, compared to German public broadcasters. In this regard, when the researcher asked a media critic for any comments on the case analysis result, the media critic said, "5 media conglomerates (Verlagsgruppen) take 99.5% of the whole media market in Germany. These rich publishers are not interested in journalism at all, their only goal is to maximize their profit. Therefore, the political tendency of most publications is determined by the rich publishers according to their neoliberal attitude."

According to the media critic, a few media conglomerates, which control the whole media market in Germany, play a role as a sponsor/supporter of high-ranking government officials, influential politicians and political parties in order to maximize revenue. In return, they offer benefits to various businesses that media conglomerates carry out. That is not well known to just the outside world; however, it is an admitted fact in the industry.

In conclusion, German private media are not oppressed/controlled by the government but do self-censorship in so-called 'collusive ties' with the regime. In short, a friendly reporting to the regime voluntarily. Therefore, it is difficult to find a case of German private media targeted by the government.

- What do you think of the media critic's argument and the analysis result?

- Do you acknowledge this reality of German private media?

Question G. Public televisions were overwhelmingly targeted.

Germany has 8 out of 20 cases. South Korea also has 15 out of 20 cases. (including semi-public television 3/20 and public radio 1/20)

In both countries, there is no case that private television alone became a target.

- What do you think two features mean?

- Why do the governments rarely exercise control/influence over private televisions? What kind of structural background is there?

- In the case of German private media (eg. progressive private media such as Spiegel), when the government attempts to exert something on it, does it actively resist as opposed to public televisions?

Question H. Rather than a ‘victim’ press company, other media outlets actively exposed facts of infringement on press freedom.

The fact that the infringed press company does not voluntarily expose the facts may be a serious problem; however, it is very positive that other media outlets expose the facts instead of the victim. This shows that the German press (in comparison with the Korean press) plays well a role as a ‘Watch Dog’.

- Why does not the ‘victim’ press company (generally public televisions) actively exposes the facts of infringement on press freedom? Or why can not?

- Why and how can other media outlets (generally private newspapers) expose the facts? Do other media outlets have something to back itself up?

Question I. In early 2016, a senior reporter working for a public television (WDR) insisted on the existence of non-documented news guidelines issued by the German government—in other words, unspoken rules. On the other hand, another senior journalist, who worked for decades at a public television, denied the government’s public television control and said as follows. “Not in Germany. There are no political orders. (Have you ever experienced the government control?) No.”

- In view of the German public television’s reality, who do you think is right? So, why do you think two journalists respectively make different claims? Please explain the reason (your opinion/thought) reasonably to suit the reality of the Germany press.

- Is there actually a government-biased unofficial news guideline (unspoken rules) within German public televisions? If so, which theme does it have?