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Redefining comparative analyses of media systems from the perspective of new democracies

Redefinición de los análisis comparativos de los sistemas de comunicación desde la perspectiva de las nuevas democracias

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ABSTRACT: Based on one of the most influential proposals intended to analyze media systems from a comparative perspective (Hallin and Mancini, 2004) as well as the criticism it has attracted, this work suggests that the manner in which the different elements of media systems have been operationalized has proven insufficient in the task of contextualizing predominant models of journalistic role performance in parts of the world other than the West. By examining

the political, economic, social, cultural and technological factors that have defined the development of journalism in Latin American countries, and specifically in Chile, we propose both widening and redefining the aspects that have to be considered in order to analyze media systems in a comparative fashion, including the reality of new democracies.

RESUMEN: Basado en una de las propuestas más influyentes destinada a analizar los sistemas de medios de comunicación desde una perspectiva comparativa (Hallin y Mancini, 2004), así como en las críticas que ha atraído, este trabajo sugiere que la manera en que han sido puestos a funcionar los diferentes elementos de los sistemas de los medios de comunicación ha demostrado ser insuficiente en la tarea de contextualizar los modelos predominantes de desempeño del rol periodístico en algunas partes del mundo más allá de Occidente. Mediante el examen de los factores políticos, económicos, sociales, culturales y tecnológicos que han definido el desarrollo del periodismo en los países de América Latina, y específicamente en Chile, se propone la ampliación y redefinición de los aspectos que deben tenerse en cuenta con el fin de analizar los sistemas de medios de comunicación de manera comparativa, incluyendo la realidad de las nuevas democracias.

Keywords: Media systems, journalism models, journalistic performance, comparative studies, Chile, Latin America, non-Western countries, new democracies.

Palabras clave: sistemas de medios de comunicación, modelos de periodismo, desempeño periodístico, estudios comparativos, Chile, América Latina, los países no occidentales, las nuevas democracias.

1. Introduction

The analysis of journalism practice and the media has become increasingly essential for the understanding of political, economic and cultural processes in different contemporary societies¹.

Specifically, three have been the main lines of research relating to this topic within the field: studies on professional journalism cultures; individual, organizational and social levels that influence the practice of journalism, and research on media systems.

Research on journalism culture and the role of the media date back to the middle of the 20th century. Its development was earlier in the United States and Western Europe, and from the beginning of the 1990s it began to be part of the research agenda of other countries around the world. Models, roles and attitudes of journalists have been analyzed by means of national and cross-national surveys, as well as interviews and observation².

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¹ Cfr. COOK, Timothy, Governing with the news: The news media as a political institution, University of Chicago Press, Chicago, 1998.

² DONSBACH, Wolfgang and PATTERSON, Thomas E., "Political News Journalists: Partisanship, Professionalism, and Political Roles in Five Countries", in ESSER, Frank and PFETSCH, Barbara (eds.), *Comparing Political Communication: Theories, Cases, and Challenges*, Cambridge University Press, New York, 2004, pp. 251-270; HANITZSCH, Thomas, HANUSCH, Folker, MELLADO, Claudia, *et al.*, "Mapping Journalism Cultures across Nations: A Comparative Study of 18 Countries", in *Journalism Studies*, vol. 12, n° 3, 2011, pp. 273-293; MELLADO, Claudia, *et al.*, "Comparing journalism

In the second line of research, different dimensions that influence journalistic practice have been identified³. Studies on this topic agree in at least three basic levels of influence in news production: the individual, organizational and the social level of influence. Most recent studies have established the predominance of the organizational and social level factors over individual factors in the practice of journalism⁴.

Finally, studies on media systems identify different political, economic, social and cultural characteristics that determine the context in which the media operate, and their connection with journalistic work⁵. Nowadays, the flow of information and the structural organization of news sources seem to vary inevitably in different systems and along with them, so do the narrative conventions of reporting. Media systems are characterized by different aspects and influenced by different dimensions⁶ that constantly shape and (re)define them. (Hujanen, Lehtniemi, & Virranta, 2008)⁷.

Most part of the research on media systems comes from the West, highly capitalist and developed societies, while Asia, Africa, Eastern Europe and Latin America have experienced different levels of conceptual dependency in this field of study.

Indeed, in spite of the long running criticism against hegemonic proposals with regard to their inability to explain other media systems⁸, most of them have been extrapolated and applied to different contexts from the ones in which they were initially developed.

Based on this concern, this article intends to contribute to the refinement of comparative studies on media systems and its impact on journalistic performance, considering into the analysis, the

cultures in Latin America. The case of Chile, Brazil and Mexico", in *International Communication Gazette*, February 2012, vol. 74, n° 1, pp. 60-77; RAMAPRASAD, Jyotika and KELLY, James, "Reporting the news from the world's rooftop: A survey of Nepalese journalists", in *International Communication Gazette*, vol. 65, n°3, 2003, pp. 291-315; TUCHMAN, Gaye, *Making News. A study in the construction of reality*, The Free Press, NY, 1978; WEAVER, David, *et al.*, *The American Journalist in the 21st Century: U.S. News People at the Dawn of a New Millennium*, Lawrence Erlbaum, NJ, 2007.

³ MCQUAIL, Denis, McQuail's Mass Communication Theory, Sage, London, 2000; PRESTON, Paschal, Making the News: Journalism and News Cultures in Europe, Routledge, London, 2009; SHOEMAKER, Pamela and REESE, Stephen, Mediating the Message: Theories of Influence on Mass Media Content, White Plains, Longman, 1996.

⁴ Cfr. HANITZSCH, Thomas, *et al.*, "Modeling perceived influences on journalism: Evidence from a cross-national survey of journalists", in *Journalism & Mass Communication Quarterly*, vol. 87, n° 1, 2010, pp. 7-24; MELLADO, Claudia, "Modeling Individual and Organizational Effects on Chilean Journalism: A Multilevel Analysis of Professional Role Conceptions", in *Comunicación y Sociedad*, vol. XXIV, n° 2, 2011, pp 254-269; ZHU, Jian-Hua *et al.*, "Individual, organizational, and societal influences on media role perceptions: a comparative study of journalists in China, Taiwan, and the United States", in *Journalism & Mass Communication Quarterly*, vol. 74, n° 1, 1997, pp. 84-96.

⁵ Cfr. BLUM, Roger, "Bausteine zu einer Theorie der Mediensysteme", en *Medienwissenschaft Schweiz*, vol. 2, 2005, pp. 5-11; BLUMLER, Jay and GUREVITCH, Michael, *The crisis of Public communication*, Sage, London, 1995; CHRISTIANS, Clifford G., *et al.*, *Normative Theories of the Media*, University of Illinois Press, Urbana-Champaign, 2010; HALLIN, Daniel and MANCINI, *Comparing Media Systems: Three Models of Media and Politics*, Cambridge University Press, New York, 2004; HALLIN, Daniel and MANCINI, Paolo, *Comparing Media Systems Beyond the Western World*, Cambridge University Press, New York, 2012; NORRIS, Pippa, "Comparative political communications: Common frameworks or Babelian confusión?", in *Government and Opposition*, vol. 44, n° 3, 2009, pp. 321-340.; SIEBERT, Fred *et al.*, Four Theories of The Press: The Authoritarian, Libertarian, Social Responsibility, and Soviet Communist Concepts of What the Press Should Be and Do, University of Illinois Press, Chicago, 1956, among others.

⁶ Cfr. MCQUAIL, Denis, McQuail's Mass Communication Theory, Sage Publications, London, 2006.

⁷ Cfr. HUJANEN, Jaana, LEHTNIEMI, Ninni, VIRRANTA, Riikka, *Mapping communication and media research in the UK*, final report, Department of Communication, University of Jyväskylä, Finland, 2008.

⁸ Cfr. CURRAN, James and PARK, Myung-Jin, "Beyond globalization theory", in CURRAN, James and PARK, Myung-Jin (eds.), *De-Westernizing media studies*, Routledge, London, 2000, pp. 3-18; DE ALBUQUERQUE, Alfonso, "On models and margins: comparative media models viewed from a Brazilian perspective", in HALLIN, Daniel and MANCINI, Paolo (eds.), 2012, *op. cit.*; SPARKS, Colin, *Communication, capitalism and the Mass Media*, Sage, London, 1998.

characteristics of emerging democracies where the specificities of the studied media systems so far are not necessarily verified and where other relevant factors that may explain journalistic performance have not been included into the analysis.

The complexity of the field requires distinguishing between what the media do, the elements that identify and characterize such media and the macrosocial context in which these media operate.

In this work, we permanently make reference to countries outside the "Western" sphere (which is understood as the hegemonic domain - mainly the United States and Western Europe). However, we will focus primarily in Chile and specifically in its post-dictatorial period (1990-2011) to identify and characterize political, economic, social, cultural and technological factors that contribute to understanding and analyzing media systems in emerging democracies. The decision of considering this period was made taking into account that Augusto Pinochet's military regime (1973-1990) substantially modified the Chilean social model, including the type of democracy, the notions of political participation and the political culture, thus impacting the practice of journalism and the development of the media⁹. Such impact can have certain similarities to other non consolidated democracies in Latin American and other regions of the world.

In light of the analysis of different proposals that have been made in order to understand different media systems, we pose a redefinition of the structural factors that could influence the materialization of different journalistic and media performance around the globe, and that have to be considered when comparing media systems. Specifically, we suggest complementing the set of indicators proposed so far to compare media systems, with new dimensions that allow for the inclusion of realities of countries such as Chile and others, which are not commonly included in this type of studies.

The first part of this article discusses the more influential theories and models on media systems, as well as the criticism they have received. We focus mainly in Hallin and Mancini's proposal (2004) on media system, one of the most influential within the field of journalism in the past few years. In the second part of this work, we propose nine factors grouped in three different dimensions in order to analyze media systems including the reality of emerging democracies. Although some of these factors have already been used by Western approaches, we suggest both redefining and adapting them according to the different contexts of analysis. Additionally, we propose several new factors to be considered.

2. Classifications of Media systems: A critical review

The first known proposal to comparatively analyze media systems around the world was *Four Theories of the Press*, in 1956. In it, Siebert et al¹⁰ theorize about the relationship of media systems and their social and political context, analyzing how the media always take the shape and color of the political and social structures in which they operate. These authors identify various factors that explain the differences between media systems, comparing ideal types: specifically, they contrast the Authoritarian, the Soviet communist, the Liberatarian and the Social Responsibility models.

Considering the absence of conceptual framework that could compete with Siebert et al models, their proposal turned out to be very influential for the study of journalism and it became a relevant didactic

⁹ Cfr. BRESNAHAN, Rosalind, "The Media and the Neoliberal Transition in Chile: Democratic Promise Unfulfilled", in *Latin American Perspectives*, Issue 133, vol. 30, n° 6, November 2003, pp. 39-57.

¹⁰ Cfr. SIEBERT, et al., op. cit.

instrument to train journalists from 60s onwards, in spite of the long running criticism it has faced through time.

Criticism was diverse: its Anglo and Eurocentric vision were questioned, as well as its absence of theorization of the types of media systems from non-Western countries¹¹.

McQuail¹², for instance, criticized the model as it defines press freedom in terms of the American Constitution –that is, associating liberty to private property and identifying the State and governments as enemies of freedom– which does not correspond to the reality of every nation.

The redundancy of the models was another point of criticism towards Siebert et al, as they refer to only two models –liberal and authoritarian– where the rest are just a variation of the same¹³. Nerone¹⁴ goes even further, posing that Sibert et al. do not offer four classifications of media systems, but just one (the liberal one), with four examples.

Finally, they are criticized for focusing exclusively in the normative aspects of media systems rather than analyzing the relationship between media structure and media systems empirically.

Throughout the years, other models that pose typologies different from that of Siebert et al have appeared.

Williams¹⁵, for example, classifies media systems as Authoritarian, Paternalistic, Commercial or Democratic. McQuail¹⁶ introduced new categories. He proposed the development model for those countries which were then considered "developing" and whose media systems were ignored by previous conceptualization. He also proposed the democratic-participant model, which aimed to reflect consolidated democracies. Likewise, Blum¹⁷ proposes six models: the Atlantic-Pacific liberal model, the clientelism model –associated to Southern European countries–, the Northern European public service model, the Eastern European shock model, the Arab-Asian patriot model and the Asian-Caribbean command model.

One of the most ambitious and current attempts of classification of media systems that has attracted the attention of researchers from different parts of the world is the one developed by Hallin and Mancini¹⁸. By taking up the idea that media systems function according to the social and political system in which they work, Hallin and Mancini propose four big dimensions to describe them, based on the analysis of Western European countries and the United States: the extent and nature of the intervention of the State in the media system, the level of political parallelism in society, the development of the media market, specially the penetration and circulation of the press, and the professionalization of journalism. From these dimensions, Hallin and Mancini classify media systems in three models: the Liberal model, characterized by commercial media and market mechanisms¹⁹; the Democratic Corporatist model, which accentuates the link between commercial media and organized social and political groups, as

¹¹ Cfr. CURRAN, James and PARK, Myung-Jin, op. cit.

¹² Cfr. MCQUAIL, Dennis, Mass communication theory. An introduction, Sage Thouand Oaks, CA, 1994.

¹³ Cfr. CHRISTIANS, Clifford, et al., op. cit.

¹⁴ Cfr. NERONE, John (ed.), Last rights. Revisiting Four Theories of the Press, University of Illinois Press, Urbana, IL, 1995.

¹⁵ Cfr. WILLIAMS, Raymond, Los Medios de Comunicación Social, Península, Barcelona, 1978.

¹⁶ Cfr. MCQUAIL, Dennis, Mass communication theory: an introduction, Sage, London, 1983.

¹⁷ Cfr. BLUM, Roger, op. cit.

¹⁸ Cfr. HALLIN, Daniel and MANCINI, 2004, op. cit.

¹⁹ Which fits the models of the UK, Ireland, the United States and Canada.

well as an active but limited role of the State²⁰; and the Polarized Pluralist model, which integrates the media to party politics, with weak commercial media and a stronger role of the State²¹.

Hallin and Mancini's proposal has been considered as an important improvement in the comparative study of media, and in the search for empirical connections between political and media systems²². However, its focus and postulates have not been free from criticism. Many have seen the heterogeneity of the countries included in a determined model as a sign of weakness (for example, some believe that within the Democratic Corporatist model, there are various versions and subsystems that the proposal doesn't reveal). Some also consider that certain countries have been located in the wrong model²³, and that the fact of focusing in the relationship between the political system and the media system, make relevant cultural, social and economic indicators invisible²⁴. However, most criticism towards Hallin and Mancini's model have been related to the omission of relevant characteristics to identify non-Western media systems, and compare them to Western systems.

Norris²⁵ has been one of the most critical voices against the model. She considers that it is not clear if the four dimensions identified by Hallin and Mancini are actually the critical aspects that define contemporary media systems. In that context, she poses that although the role of state ownership and media subsidies are a relevant aspect of the proposal, Hallin and Mancini give little regard, at least explicitly, to the importance of press freedom and the different legal frameworks that ensure or deny freedom of speech. Moreover, Norris condemns the exclusion of press freedom as a possible empirical indicator of different media systems, though nowadays, many international institutions have crossnational indicators that allow for the comparison of different countries with different social and political contexts (Freedom House, IREX, Reporters Without Borders, among others).

Norris and Hardy²⁶ agree that Hallin's and Mancini's omission of new technologies and entertainment formats on media systems analysis is another weakness of the proposal, since they are key to understanding the transformations and the functioning of journalistic work in the last years.

Although Hallin and Mancini deliberately decide to focus on a limited number of Western countries in their analysis, they both conclude that the Polarized Pluralist model would offer a more accurate description of journalism in many parts of the world –they even pose that such model would be the closest to the one in Latin American countries²⁷. However, several scholars have reflected upon the nature of that model and its true applicability on media systems beyond the Western world. Although the "most similar systems" design that Hallin and Mancini propose is useful, in terms that it limits the number of variables that have to be analyzed and compared, it is insufficient in order to apply the model to different countries.

²⁰ Distinctive of countries such as Germany, Switzerland, Austria, Holland, Belgium, Sweden, Norway, Denmark and Finland.

²¹ Characteristic of France, Italy, Spain, Portugal and Greece.

²² Cfr. HAMPTON, Mark, "Media studies and the mainstreaming of media history", in *Media history*, vol. 11, n° 3, 2005, pp. 239-246; MCQUAIL, Dennis, "Book Review. Comparing Media Systems: Three Models of Media and Politics", in *European Journal of Communication*, vol. 20, n° 2, June 2005, pp. 266-268.

²³ Cfr. MCQUAIL, Dennis, 2005, op. cit.; NORRIS, Pippa, op. cit.

²⁴ Cfr. JAKUBOWICZ, Karol, "Introduction. Media Systems Research: An Overview", in DOBEK-OSTROWSKA, Boguslawa, GLOWACKI, Michat, JAKUBOWICZ, Karol and SÜKÖSD, Miklós (eds.), *Comparative Media Systems. European and Global Perspective*, CEU Press, Budapest, 2010, pp. 1-21.

²⁵ Cfr. NORRIS, Pippa, op. cit.

²⁶ Cfr. HARDY, Jonathan, Western media system, Routledge, NY, 2008.

²⁷ Cfr. HALLIN, Daniel and PAPATHANASSOPOULOS, Stylianos, "Political clientelism and the media: southern Europe and Latin America in comparative perspective", in *Media Culture & Society*, vol. 24, n° 2, 2002, pp. 175-195.

Recently, Hallin and Mancini themselves edited *Comparing Media Systems Beyond the Western World*²⁸, thus extending the analysis of their model to Asian, African and Latin American countries. In that book, Albuquerque²⁹ criticizes the way in which Hallin and Mancini define the Polarized Pluralist model, and in particular, the idea that such model can explain media systems in Eastern Europe, Latin America, the Middle East, Africa and most of Asia. In this sense, he suggests that such a broad use of the term Polarized Pluralist runs in the risk of becoming a wrong concept and a sort of wild card that includes all that doesn't fit in the other models.

In the same line, Voltmer³⁰ poses that fitting media systems of new democracies in one of the three models proposed by Hallin and Mancini is just disguising the broad variation that can be found empirically outside the Western world.

3. Redefining the context of analysis on media systems research

Based on the previous literature review, this article proposes a redefinition of the dimensions that should be used in order to characterize media systems around the globe. Taking all criticism towards Hallin and Mancini into account, this proposal complements the dimensions they pose, visualizing aspects that characterize non-Western countries and emerging democracies.

Starting from the analysis of the specific Chilean case, as well as in relation to other countries which have experienced democratic transitions and political change during the past decades, we analyze the redefinition of a group of political, economic and cultural characteristics that should be considered to study media systems and journalism models in those contexts more accurately, and to be able to compare them to Western media systems. In this sense, we complement the dimensions exposed exposed by Halin and Mancini with the definition of new variables. Additionally, we contextualize and/or reformulate the definition of specific categories proposed by them.

The categories analyzed by this article can be grouped in three big dimensions: Political (type of political regime, political structure, level of political parallelism, political culture, and freedom of speech); Cultural (cultural values in society); and Media characteristics (intervention/participation of the State in the media system, development of the media market; and professional independence in the field of journalism, in both structural and individual level) (See Table 1).

These factors, although differentiated, together model the different types of journalism around the world. Considering the appearance and the access to available databases that include political, as well as cultural, social and economic level indicators of countries today, this analysis is possible and necessary.

²⁸ Cfr. HALLIN, Daniel and MANCINI, Paolo, 2012, op. cit.

²⁹ Cfr. DE ALBUQUERQUE, Alfonso, op. cit.

³⁰ Cfr. VOLTMER, Katrin, "How far can media systems travel? Applying Hallin & Mancini's comparative framework outside the Western world", in HALLIN, Daniel and MANCINI, Paolo (eds.), *Comparing Media Systems Beyond the Western World*, Cambridge University Press, New York, 2012, pp. 224-245.

Table 1. Proposed dimensions and indicators for the compared analysis of Media Systems

PROPOSED DIMENSIONS AND INDICATORS	AVAILABLE SOURCES
POLITICAL	
Political regime	Democracy Index http://www.eiu.com/default.aspx
Type of political regimeType of democracy	The democracy ranking of the quality of Democracy http://www.democracyranking.org/en/index.htm Transparency International www.transparency.org/
	Index of Democratic Development in Latin America (only for countries of that region) http://www.idd-lat.org/
Federal/Unitary State Presidentialist/parliamentary regime Political parallelism	ECLAC (for Latin America) http://estadisticas.cepal.org/cepalstat/WEB_CEPALSTAT/Portada.as p World Bank http://data.worldbank.org Commercial and corporate information of the media
 Media Political orientation Media Ownership Connection to private and government interests Participation of political/trade interest related individuals in the corporate governments/newsrooms of the media 	National/local statistics (In the Chilean case, for example, successful initiatives have been developed, such as www.poderopedia.com, which deliver systematic information in this regard)
 Unionization Number of organizations in the civil society/participation in civil society organizations Voter turnout State/citizen relationship Political affiliation 	United Nations Development Programme http://www.undp.org/content/undp/en/home.html ECLAC (for Latin America) http://estadisticas.cepal.org/cepalstat/WEB_CEPALSTAT/Portada.as http://estadisticas.cepal.org/cepalstat/WEB_CEPALSTAT/Portada.as http://estadisticas.cepal.org/cepalstat/WEB_CEPALSTAT/Portada.as http://estadisticas.cepal.org/cepalstat/WEB_CEPALSTAT/Portada.as http://estadisticas.cepal.org/cepalstat/WEB_CEPALSTAT/Portada.as http://estadisticas.cepal.org/cepalstat/web_cepalstat/w
Freedom of speech (absence, presence, quality)	Eurobarometer http://www.europarl.europa.eu/aboutparliament/es/00191b53ff/Eurobarómetro.html Freedom in the World http://www.freedomhouse.org/report/freedom-world/freedom-world-2013

 Freedom of opinion, assembly and creation regulations Enforcement on freedom of opinion, assembly and creation regulations 	International Labor Organization http://www.ilo.org/ IREX www.irex.org Amnesty International http://www.amnesty.org/ Index on Censorship http://www.indexoncensorship.org
CULTURAL	
Cultural values	
 Rational-secular values Self-expression values Distance from power Individualism v/s collectivism Masculinity v/s femininity Conservatism/autonomy Self-transcendence/self-enhancement, among others 	World Values Survey www.worldvaluessurvey.org The Hofstede Centre http://geert-hofstede.com/countries.html
MEDIA Intervention of the State in the media system	
 State subsidies to communications media Nationalization or privatization policies Interventionism in communications media 	UNESCO http://www.unesco.org/ National/local statistics
Development of the media industry (including different formats and supports) Number of formats Size and scope of the media Commercial orientation of the media Media consumption (print run, sale and readership) Media access	World Association of Newspapers (WAN) http://www.wan-ifra.org World Bank http://data.worldbank.org/topic/infrastructure http://www.unesco.org/ IREX www.irex.org
Perceived levels of autonomy Professional attitudes and values Regulations of freedom of the press	Freedom of The Press Index http://www.freedomhouse.org/report-types/freedom-press Press Freedom Index (Reporter Without Borders) www.rsf.org

- Number of graduated journalists
- Number of journalists who are unionized/collegiate members
- Number of undergraduate and graduate journalism programs

Worlds of journalism www.worldsofjournalism.org

National/regional/local statistics

National/regional/local laws

Political Dimension

3.1. Political Regime

One source of criticism for the analytical model proposed by Halin and Mancini is that it only compares media systems among democratic and consolidated societies, which makes these models fail in their ability to explain the circumstances of more than half of the world's population that now lives under hybrid and authoritarian regimes³¹.

For example, more than half of the countries that form part of Latin America, have low levels of democratic development³². In that framework, the presence/absence of a democratic system appears as a fundamental indicator to the study of media systems, as it directly affects journalistic performance.

It is also necessary to identify the different democracy models available among democratic regimes, as they could also affect the relationship between journalism and power. Voltmer³³ indicates that the spread of democratic regimes around the world during the past three decades has brought new ways of democratic practice that differ and even contradict Western expectations. Strömbäck³⁴, for instance, proposes a classification of four democracy models that could be used for this purpose: the procedural, competitive, participatory and deliberative democracy models.

Although the study of political transitions in Eastern Europe, Africa and Latin America has been scant, recent works³⁵ have begun to open common perspectives, with special interest in the transformations experimented by media systems, as it was, for example, the Chilean process starting from 1990³⁶. The first government after the fall of Pinochet set out to restore democracy; its formal rituals and institutions, such as elections. However, Pinochet was still in charge of the Chilean Army and the so-called "institutional ties" ensured a huge political participation of the Armed Forces (for example, former officers were appointed senators in Congress and the President of the country lacked the ability to oust the Commander in Chief of the Armed Forces).

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³¹ http://www.democracyranking.org/en/index.htm

³² http://www.idd-lat.org/

³³ Cfr. VOLTMER, Katrin, op. cit.

³⁴ Cfr. STRÖMBÄCK, Jesper, "In Search of a Standard: four models of democracy and their normative implications for journalism", in *Journalism Studies*, vol. 6, n° 3, 2005, pp. 331-345.

³⁵ Cfr. HADLAND, Adrian, *The South African print media, 1994-2004: An application and critique of comparative media systems theory*, Doctoral Thesis, Centre for Film and Media Studies, University of Cape Town, South Africa, 2007; MAY, Rachel and MILTON, Andrew (eds.), *(Un) Civil societies. Human Rights and Democratic Transitions in Eastern Europe and Latin America*, Lexington Books, New York, 2007; RAO, Shakuntala and WASSERMAN, Herman, "Journalism in the New Media World Order: The changing face of journalism practices in China, India and South Africa", Paper presented at the I Congreso Internacional sobre estudios de Periodismo, Santiago de Chile, June 27th-29th, 2012.

³⁶ Cfr. BRESNAHAN, Rosalind, *op. cit.*

Nowadays, with Pinochet out of the political scene, Chilean democracy has been rearranged; it assumes some characteristics of the competitive model and it could generally be associated to the procedural democratic model. However, it has still not been able to consolidate many of its formal aspects. Many popular political offices are still appointed by the president on duty, high parliamentary quorum is required to pass constitutional amendments and the elections system hinders the participation of independent forces or small political parties other than the main political conglomerates.

Evading the type of political regime or the type of democracy makes them and other elements in discussion invisible, affecting the accuracy on the analysis of media system.

3.2. Political Structure

In many Latin American countries, decentralization and regionalization have been considered a priority in the process of redemocratization. However, centralization in decision-making, and the marginal amount of regional participation is still a reality in many of them, undoubtedly affecting the way in which the media develop and operate³⁷.

Chile, for example, presents a high level of centralization of political and economic decisions in the capital city³⁸, a different case from what happens in Brazil, where its condition of federal State allows for decisions to be made autonomously and where the power is shared.

This translates to the scope of media systems, from the point of view of both production and consumption. Latin American countries in general, and Chile in particular, have a tendency to geographically concentrate and centralize its cultural industries, thus leaving most of the population with little access to both content production and its consumption³⁹.

As well as identifying the geographic-political organization of a macro system (unitary versus federal State for example), analyzing whether the State is governed under a presidentialist or a parliamentary regime is equally important⁴⁰. The parliamentary regime requires strong political parties and it is a practically inexistent organization model in Latin America. Presidentialist regimes, which are dominant in the political systems of the continent, have been fertile ground for 'caudillos' and extrapartisan political figures, as has been the Argentine, Peruvian, Venezuelan and Ecuadorian experience: Figures who appeal to populist discourse and strategies, who usually give form to movements or parties based on their figure and disregard of the intermediary role of traditional political parties. Their surfacing, consolidation and strengthening depend, to a great extent, on how they unfold in the media sphere⁴¹.

³⁷ Cfr. AGHÓN, Gabriel, et al., Desarrollo económico local y descentralización en América Latina: un análisis comparativo, CEPAL, Santiago de Chile, 2001.

³⁸ Cfr. MELLADO, Claudia et al., 2012, op. cit.

³⁹ Cfr. MASTRINI, Guillermo and BECERRA, Martín, *Periodistas y magnates. Estructura y concentración de las industrias culturales en América Latina*. La Crujía, Buenos Aires, 2006.

⁴⁰ Cfr. DE ALBUQUERQUE, Alfonso, op. cit.

⁴¹ Cfr. WAISBORD, Silvio, 2012, op. cit.

3.3. Political parallelism

The *level of political parallelism* is another aspect that Hallin and Mancini propose to examine in their comparative study of media systems. Although this aspect is key, the countries' historical and political context forces its definition and analysis from two perspectives. On one side, political parallelism can refer to the point in which different media reflect different political orientations in its content. On the other side, political parallelism can be related to the instrumentalization of the media; this is, control over the media by private interests regarding political alliances and ambitions that use the media for political purposes⁴². Both perspectives can happen at the same time, but there can also be media systems where just one of them is present, as is the current case of Chile.

According to Sparks⁴³, although in Latin America there is a political power over the media, its effect has not been to restrict political power, but to produce and defend oligopolies, a relationship that has been maintained in both democratic governments and dictatorial regimes.

In Chile, the beginnings of the press are linked to the elite: only such people had a level of literacy compatible to the consumption of newspapers (it was the only possible target) and, at the same time, they were the ones who supported and funded press projects as a political strategy. Such elite has had and still has a homogeneous composition, with strong family, political, economic, social and cultural ties. The news media also follow this pattern, with their own agenda and operating as political actors and companies with specific economic interests, having the highest rate of concentration of media ownership in all of Latin America⁴⁴. Additionally, there are political actors (governmental, even), that formally participate in the newsroom (in editorial boards), as well as executives or former executives from big newspapers who join the government (as advisers, for instance)⁴⁵.

Although there are no standardized scales or direct international measurements on political parallelism, researchers can base their observations in the aforementioned aspects in order to analyze the presence/absence of this phenomenon in different contexts.

3.4. Political Culture

The type of citizenry in a determined political, social and historical moment is a factor that needs to be taken into consideration when analyzing both media systems and different models of journalistic performance. That is to say, what is the type of (individual) citizen and citizenry (collective) that characterize a determined society? If there are new citizens, we face new target audiences. Therefore, the media –which survive thanks to advertising and market audience—have to be in tune with these new audiences.

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⁴² Cfr. BECERRA, Martín and MASTRINI, Guillermo, Los dueños de la palabra. Acceso, estructura y concentración de los medios en la América Latina del siglo XXI, Prometeo libros, Buenos Aires, 2009; HALLIN, Daniel and PAPATHANASSOUPOULOS, Stylianos, op. cit.; HUGHES, Sallie, Newsrooms in conflict. Journalism and the democratization of Mexico, University of Pittsburgh Press, Pittsburgh, 2006; WAISBORD, Silvio, Watchdog Journalism in South America: News, Accountability and Democracy, Columbia University Press, NY, 2000.

⁴³ Cfr. SPARKS, Collin, "Media and Transition in Latin America", in *Westminster Papers in Communication and Culture*, vol. 8, n° 2, 2011, pp.154-177.

⁴⁴ Cfr. BECERRA, Martín and MASTRINI, Guillermo, 2009, op. cit.

⁴⁵ Cfr. LAGOS, Claudia (ed.), DOUGNAC, Paulette, HARRIES, Elizabeth, SALINAS, Claudio, STANGE, Hans and VILCHES, María José, *El diario de Agustín: Cinco estudios de casos sobre El Mercurio y los derechos humanos (1973-1990)*, LOM Ediciones, Santiago de Chile, 2009.

Thus, it is relevant to measure the type of predominant political culture of a country in the analysis of media systems. That is to say, how are citizens related to power and with public space, and what is the character and depth of citizen participation.

Almond and Verba⁴⁶ propose a classification of three types of political culture that could be used for such effects: a parochial culture, in which there is no clear differentiation of political roles and the expectations existing between social actors, and where the subject is passive and unconscious of the political system in all of its aspects; a culture of subjects, in which role and institutional differentiation exist in political life, where citizens are conscious of how the political system works, but where they have a passive stance; and a participatory culture, in which the relationships between specialized institutions and opinion and citizen activity are interactive, and the citizen is active.

After having undergone an authoritarian process or dictatorship of any kind, social and political coexistence becomes damaged: all kinds of participatory spaces and institutions are banned (parliament, territorial and intermediate organizations, political parties, among others), and fundamental rights, such as the rights of participation, assembly and organization, are violated. Along with this kind of actions, authoritarian regimes are usually characterized by vituperative speeches on political action, maining citizen engagement for long periods of time.

In the case of Chile, after 17 years of dictatorship, society was instilled with fear. Chileans stated that they didn't trust their neighbors, and that their closest relationships were limited to their families. In spite of all the country's progress in this regard, there is still no evidence that this social fabric has been solidly reconstituted⁴⁷. Likewise, there are low levels of voter turnout and high discredit of political activity. The voter registration figures, from the plebiscite of year 1988 until now, have decreased continuously. Nowadays, participatory Chileans are a minority and they are mostly involved in religious or sports organizations⁴⁸.

The surfacing of new actors and social movements has been closely linked to the penetration of social networks, which have become part of the agenda of traditional media outlets. However, this social empowerment is not an established phenomenon.

Considering Almond's and Verba's classification, Chile would still have a strong "parochial culture", in which citizens are just remotely conscious of the presence of the central government, and they live their lives with a hint of political apathy, thus, independent from the decisions made by the State. A similar situation is observable in Mexico⁴⁹. However, there has been a gradual and progressive evolution that could modify the political culture of these countries in the forthcoming years, which could lead to modifications of aspects of their media systems.

3.5. Freedom of speech

Freedom of speech, understood as the right to free flow of ideas, is considered stable in developed democratic societies. However, this is far from being the case of the entire world. This is why it is

⁴⁶ Cfr. ALMOND, Gabriel and VERBA, Sidney, The Civic Culture: Political Attitudes and Democracy in Five Nations, Princeton University Press, Princeton, NJ, 1963.

⁴⁷ Cfr. LECHNER, Norbert, Las sombras del mañana, LOM Ediciones, Santiago de Chile, 2002; PNUD Programa de Naciones Unidas para el Desarrollo, Desarrollo Humano en Chile, PNUD, Santiago de Chile, 1996.

⁴⁸ Cfr. PNUD Programa de Naciones Unidas para el Desarrollo, Informe Desarrollo Humano en Chile - Año 2000. Más *Sociedad para Gobernar el Futuro*, PNUD, Santiago de Chile, 2000. ⁴⁹ Cfr. MELLADO, Claudia, *et al.*, 2012, *op. cit*.

essential to consider, in each case, whether freedom of speech is guaranteed in different countries/regions or not. In order to do this, the constitutional and legal frameworks, the role of the judiciary, the presence/absence of de facto or illegal powers that may jeopardize this right have to be considered, as well as the indirect restrictions; this means, those mechanisms which are legal, but which are used with the purpose of silencing and penalizing critical voices.

Independences in Latin America were inspired by the European and North American revolutionary processes, trying to assume their philosophical principles, but in completely different cultural, political and institutional settings. In spite of this, liberal ideals inspire institutional and constitutional frameworks of the countries in the continent, and particularly Chile's⁵⁰. In general, freedom of speech is a right guaranteed by Constitution. In some cases, it has been enriched by two different aspects: the right to access information and the right to provide information or communication.

However, unlike Western societies with a tradition of respect for freedom of speech, the legal frameworks of a great part of non-Western countries still have traces of authoritarian societies where, in different levels and magnitudes⁵¹, critical opinions are penalized, justice systems are weapons to punish criticism, political authorities usually create and improve criminal justice tools to prosecute dissidents (such as penalizing demonstrations and social actions)⁵², and where freedom of speech can be restricted by means of disproportionate civil penalties⁵³.

In the Chilean case, the Constitution guarantees freedom of speech without prior censorship, the right of assembly and the right to demonstrate. However, there are criminal penalties to what are called crimes of opinion and information, as well as civil penalties. Additionally, the military still has influence over matters which are inconsistent with international democratic standards, such as criminalizing and penalizing contempt and sedition. The powers of the State usually implement measures which tend to punish public criticism, or otherwise use criminal justice mechanisms to prosecute dissident opinions⁵⁴.

Cultural dimension

3.6. Cultural values

Given the conceptual development of different models which have begun to measure cultural values from the perspectives of anthropology, psychology and political science 55, it is now possible to

⁵⁰ Cfr. HRW Human Rights Watch, *Los límites de la tolerancia. Libertad de expresión y debate público en Chile*, LOM Ediciones, Santiago de Chile, 1998.

⁵¹ Cfr. CABALIN, Cristian and LAGOS, Claudia, "Libertad de expresión y periodismo en Chile: presiones y mordazas", in *Palabra Clave*, vol. 12, nº 1st June, 2009.

⁵² Cfr. RABINOVICH, Eleonora, et al., Vamos a portarnos mal. Protesta social y libertad de expresión en América Latina, Centro de Competencia en Comunicación para América Latina Friedrich Ebert Stiftung y ADC, Asociación por los Derechos Civiles, Buenos Aires, 2011.

⁵³ Cfr. CIDH Comisión Interamericana de Derechos Humanos, *Informe anual de la Relatoría Especial para la Libertad de Expresión, 2011: Informe anual de la Comisión Interamericana de Derechos Humanos*, vol. 2, Washington D.C., 2011.

⁵⁴ Cfr. CABALIN, Cristian and LAGOS, Claudia, op. cit.

⁵⁵ Cfr. HOFSTEDE, Geert, Culture's Consequences: International Differences in Work-Related Values, Sage Publications, Beverly Hills CA, 1980; INGLEHART, Ronald and WELZEL, Christian, Modernization, Cultural Change, and Democracy: The Human Development Sequence, Cambridge, New York, 2005; SCHWARTZ, Shalom H. "A Theory of

characterize different societies according to the attitudes which are more highly regarded by its members (more liberal, more traditional, more individualist, more community oriented or more sympathetic, more masculine, more feminine, etc).

In general, these models operationalize cultural values looking at the daily life of people, such as identity and human development, religion, attitudes towards politics and civil liberties, work ethic and coexistence in a community; the valuation and relation with power, hierarchy, equality and autonomy, among others.

If we think about the specific case of Latin American societies, we can assert that they are closer to traditional values. Although there has been an evolution towards values which are particular to rational-secular societies, this change has been slow and is still in process. These societies have a more favorable attitude towards religion, patriotism, respect for authority, education on obedience and value of the traditional family⁵⁶.

The World Values Survey (WVS) has been carried out in Chile in four occasions (1990, 1996, 2000 y 2006). The data show over time that the Chilean society has been secularizing gradually, the importance of religion in people's life has been decreasing, yet not the importance of God. This has gone hand in hand with a process of materialism that has been consolidating. One of the attitudes which is most resistant to change is related to women and their role in society⁵⁷.

The WVS results also show that although Chile still has deeply rooted survival values, it has gradually gotten closer to self-expression values. There results are consistent with those analyzed by national authors about the Chilean culture.

Looking into the predominant cultural values of a determined society can be useful in order to characterize some aspects of its media system. As the media needs the audience to validate its practice, it seems unlikely that they develop formats and contents that go against the culture in which they are set. In this sense, media systems and their content should somehow reflect the type of values that are predominant in their societies. Is it possible to have in Chile a media system characterized by scrutinizing the de facto powers, if the society has a deep respect for hierarchy and it values education on obedience? This type of characteristics would contribute, for example, to explaining the difficulty of developing a watchdog model of journalism.

Media dimension

3.7. *Intervention of the State*

The extent of State interventionism is one of the dimensions that Hallin and Mancini consider relevant for the understanding of media systems. However, what consolidated democracies understand as State interventionism does not correspond to the type of interventionism that has so far been the reality for non-consolidated democracies: the extent, the areas and the type of State intervention in these contexts is much broader and complicated than what could be expected in a stable democracy. In some cases, even, some governments have used illegal mechanisms to control the media.

Cultural Values and Some Implications for Work", en *Applied Psychology: An International Review*, 1999, vol. 48, no 1, pp. 23-47.

³⁶ Cfr. INGLEHART et al., op. cit.

⁵⁷ Cfr. INGLEHART et al., op. cit.

In Latin America, the development of the media market has been possible thanks to some degree of boost from the State, by means of subsidies or somewhat impartial public policies.

In the Brazilian case, State subsidies have played an important role in the economic life of the media⁵⁸. In Peru, under Alberto Fujimori's authoritarian regime (1990-2000), the State co-opted the press by buying executives and professionals with editorial responsibility in the media, of all kinds. At the same time, they financed the editing and publishing of the popular press, intended for slandering the most critical dissidents of the regime. The regime kept a tight grip on the media by owning a TV station and selectively distributing State advertising. After Fujimori's resign, the governments that followed refused to use State media as spokespeople, trying to incorporate them to the market logic and get advertising investment⁵⁹. Today, the relationship between the State and the media in Peru is kept in the discretionary awarding of radio-electric licenses⁶⁰.

In the past decade, several Latin American countries have boosted reforms to their media systems which have generated strong resistance from unions and players in the industry, as have been the case of Venezuela, Argentina and Ecuador. In other countries, such as Uruguay and Brazil, political processes have been boosted with more or less citizen participation, intending to rethink their media systems and several constitutional, while legal reforms have been set going.

In the cases of Bolivia, Ecuador and Venezuela, their presidents have built a confrontational relationship with the mass media, suspending radio-electric awarding, prosecuting journalists and critical media outlets. However, they have also implemented active policies for the creation and development of a State media system, especially in radio and television⁶¹.

In Chile, the dictatorship closed down mass media, confiscated their belongings, intervened all the surviving media and it privatized the info-communication space⁶². After the return to democracy, and as a result of the deep financial and credibility crises of public television after having been spokespeople for the dictatorship, it was given autonomy, a new corporate government whose members have to be appointed by the president of the Republic along with the Senate, and it took all public financing from it. This forced it to self-financing. *La Nación*, on its part, was the Chilean State newspaper until 2010, the year in which its printed version was stopped. Nowadays, it has also been considered to close down its online version.

At present, the Chilean State operates in two senses: On the one side, it has a *laissez-faire* stance regarding the media market. On the other side, such disregard has implied an absence of policies that guarantee a fair access to the broadcasting system, with unequal regulatory frameworks for non-commercial radio and television stations, and the inexistence of a public broadcasting system.

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⁵⁸ Cfr. WAISBORD, Silvio, Democracy, journalism, and Latin American populism, in Journalism (in press).

⁵⁹ Cfr. GARGUREVICH, Juan, "Perú, Medios del Estado y gobiernos. Recorrido histórico", in *UNIrevista* - vol. 1, nº 3, julio 2006, pp. 1-7.

⁶⁰ Cfr. ACEVEDO, Jorge. "Ganó Ollanta Humala ¿Perdieron los medios de comunicación?", in SEVERAL authors *Medios y Elecciones 2009-2011 en América Latina*, Friedrich Ebert Stiftung, Bogotá, 2011, pp. 1-26.

⁶¹ Cfr. WAISBORD, 2012, op. cit.

⁶² Cfr. TIRONI, Eugenio and SUNKEL, Guillermo, "Modernización de las comunicaciones y democratización de la política. Los medios en la transición a la democracia en Chile", in *Estudios Públicos*, nº 52, primavera 1993, pp. 215-246.

3.8. Development of the media market

A fundamental characteristic in the study of media systems is the development of media markets, but without excluding media types, as in Hallin and Mancini's (2004) model. On one side, it is necessary to compare the size of the media industries, not just between Western and non-Western countries, but within the same region. Mellado et al⁶³ compared the size of the media industries of Mexico, Brazil and Chile, and they found that the first two have media industries a lot more complex, bigger and diversified than the last one. One of the reasons that explains such difference is demographic size, as well as public policies: In Brazil as much as in Mexico, the media industry, particularly the audiovisual industry, were supported and financed by the State as strategic elements for the structuring of national identity.

On the other side, it is fundamental to consider the relevance and development of new technologies, as well as the subsequent development that the region has had in terms of television and Internet markets. Also, the changes that the radio and the printed press have undergone in post-dictatorial societies, where economic blockage maimed growth possibilities prior to the 90's. In this case, the time variable has been key, considering that the technological transformation has bursted in with greater strength in the past 15 years.

In the Chilean case, the GDP in the field of both communications and culture has grown between 1990 and 2011. However, they are still proportionately of little significance in comparison to the country's total GDP. In spite of the economic prosperity, the media system has not been strengthened. In fact, the political transition did not encourage the appearance of new media and nowadays, there are less newspapers and magazines than in 1999.⁶⁴

However, new technologies have allowed for the emergence of original journalistic projects, as is the case of *The Clinic*, *El Periodista*, *El Mostrador* and *Ciper*, which have been gaining a space in the Chilean media ecosystem.

In the area of telecommunications, growth has been exponential: in 1993, there were less than 300 thousand subscribers to cable television. In 2011, these had increased fourfold. Most Chileans say they get informed by watching news from broadcast television⁶⁵. Almost all homes are equipped with radio and TV sets. Conversely, newspapers have been losing ground: only 17% of Chileans state they get informed by that means⁶⁶. However, in spite of the loss of its massive character, newspapers are still a relevant source for the construction of the political and media agenda.

The use of social networks has also changed in the way in which the information product is received and the way the media are used: although the penetration of the Internet has been slower in Chile than in other countries, such presence has been steady over time and today, Chileans proportionately present one of the highest rates of *facebook* and *twitter* penetration in the world⁶⁷. Smartphones and tablets have steadily penetrated the Chilean market. Additionally, traditional media have also incorporated spaces for "citizen journalism", taking in videos, photos or *tweets* sent by the viewers or users⁶⁸.

⁶⁴ Official newspaper register, newspapers and magazines members of the National Association of the Press, ANP, from 1999-2011.

⁶³ Cfr. MELLADO, Claudia, et al., 2012, op. cit.

⁶⁵ Cfr. CNTV Consejo Nacional de Televisión, Séptima Encuesta Nacional de Televisión, Santiago de Chile, 2011.

⁶⁶ Cfr. AZÓCAR, Andrés, Final report "Estudio Nacional sobre lectoría de medios escritos", Fondo de Estudios sobre Pluralismo en el Sistema Informativo Nacional, Conicyt-Gobierno de Chile, Santiago de Chile, 2010.

⁶⁷ Cfr. SER DIGITAL CHILE, *Perfil de uso y penetración de redes sociales online (social networking) in Chile*, Ser Digital, Santiago de Chile, 2010.

⁶⁸ Cfr. PUENTE, Soledad and GRASSAU, Daniela, "Periodismo ciudadano: dos términos contradictorios. La experiencia chilena según sus protagonistas", in *Palabra Clave*, vol. 14, nº 1st June, 2011, pp. 137-145.

As well as considering the different types of media and technological progress, we think it is relevant to address the people's access to the media. In this sense, it is now possible to obtain indicators of access and media use from information provided by national development, cultural and/or communication organizations, as well as from statistics from international organizations (for example, the Economic Commission for Latin America and the Caribbean (ECLAC), the United Nations Development Programme (UNDP), technical organizations of the European Union and the UNESCO, among others).

3.9. Levels of independence of the journalistic field

One of the four dimensions that Hallin and Mancini propose in order to analyze media systems is the level of professionalism in journalism. Operationalizing this dimension, however, is complicated, since the meaning of "professionalism" can differ among societies. In fact, such concept hasn't always been associated to the same characteristics: while for some it is related to levels of autonomy, for others it is related to levels of formal higher education, or with an agreed and unique body of knowledge, or with normative definitions that do not adapt to all realities. For this reason, we propose instead to measure the independence of the journalistic field, which allows for more valid comparisons between countries based on empirical indicators.

In order to look into the levels of independence of the journalistic field, it is possible to consider the individual level –perceptions of news professionals⁶⁹–; the organizational level, which connects the conditions of news organizations where journalists work⁷⁰, and the macrosocial level, which considers the connections between the socio-political and economic system to the profession in terms of the levels of press freedom that they have to work independently, or, conversely, the existence of restrictive regulatory frameworks, legal harassment, threats or violence against the press, bad use of State advertising or commissioning of radio-electric frequencies, among others⁷¹. At this level, there are many international indicators, such as Freedom House, IREX, Reporters Without Borders, which compare freedom of the press around the world. Of course, the result can vary, depending on the level of analysis used.

At the macro level, it is possible to see that in many countries of the Southern hemisphere, as well as in post-communist countries, authoritarian regimes exterminated all levels of journalistic freedom for decades, damaging its practice⁷². During the last years, with the recovery of democracy in most of them, the press has had to readapt itself, recovering the freedom which was lost under dictatorial regimes.

In the Chilean case, just as the Coup d'état radically transformed the relationship of the State with the media system and journalism, it also had influence over press freedom: censorship was imposed by means of military officials that intervened the newsrooms, states of emergency were used to prevent the circulation of the media, and journalists and communicators were persecuted, arrested and killed.

⁶⁹ Cfr. MELLADO, Claudia and HUMANES, María Luisa, "Modeling perceived professional autonomy in Chilean journalism", in *Journalism*, vol. 13, nº 8, 2012, pp. 985-1.003/

⁷⁰ TUCHMAN, Gaye, op. cit.

⁷¹ BECKER, Lee B., VLAD, Tudor, and NUSSER, Nancy, "An Evaluation of Press Freedom Indicators", in *International Communication Gazette*, vol. 69, no 1, 2007, pp. 5-28.

⁷² SPARKS, Colin, "Media systems in transition: Poland, Russia, China", in *Chinese Journal of Communication*, vol. 1, no 1, 2008, pp. 7-24.

One of the first measures adopted after the end of the dictatorship was to move the trials against journalists from court-martials to civil courts. Also, a draft law on freedom of opinion, information, right to practice journalism was boosted, but it took over a decade to be approved (known as the Press Law), which establishes a conscience clause, and which recognizes the right to protection of sources and the preferred practice of the profession.

Today, Chile guarantees freedom of the press constitutionally; there are no official permits required to founding a newspaper and the State does not openly restrict the media. Since 1990, Chile has been among the two or three countries well ranked in terms of press freedom, with the exception of year 2011, due to violence against journalists during the coverage of social demonstrations. However, there are still some indirect restrictions, such as obstacles imposed by the authorities to access their activities, or requirements in order to report from certain spaces which by definition are "public", such as the National Congress. Additionally, the law still has some criminal penalties against investigative journalism. Also, the equitable and democratic access to the radio-electric spectrum is not guaranteed, since the current regulation grants better conditions to access, keep and renew radio-electric awarding to commercial rather than community parties, favoring financial over technical offers⁷³.

Such censorship elements are not present in all media systems and they can generate significant differences in journalism models which are developed in determined social contexts.

Naturally, the constrictions that the profession faces also have to do with the dependence that it has at the organizational level in the access to the audience. The way in which professional journalists usually have to access the audience is by means of paid work in a news media, where they have to adapt to a hierarchical structure and internal restrictions that somehow limit their levels of independence⁷⁴.

At the individual level, and contrary to the tendency of different international studies, Mellado and Humanes⁷⁵ found that Chilean journalists perceive a high level of autonomy, which tends to question the overall definition that journalists give to autonomy as a professional value within different contexts and cultures. These authors also found that although internal and external restrictions affect the perceived levels of autonomy significantly, the levels of economic influence –such as commercial pressures or the reliance of media on advertising- do not influence the perception of these professionals, indicating the naturalization the journalists give to these media structural factors.

4. Final remarks

In light of one the most influential recent proposals that have been made by Western countries in order to analyze media systems (Hallin and Mancini, 2004), the criticism against its Anglo and Eurocentric emphasis –and with it, its inability to extrapolate its models to realities that are outside the hegemonic Western world, as is the Latin American case—this article sought to expand and redefine the factors that have to be considered in order to analyze media systems around the world.

Based on the particular case of post-dictatorial Chile (1990-2011), we propose nine factors to be included in the analysis of media systems around the world. These factors have been grouped in three big dimensions; the political dimension (political regime, national political structure; level of political

⁷³ Cfr. CIDH, op. cit.

⁷⁴ SKOVSGAARD, Morten, "Watchdogs on a Leash? Journalists' Sense of Professional Autonomy and Relationship With Their Superiors", talk presented at the 62nd Conference of the International Communication Association, Phenix, Arizona, 24th-28th May, 2012. ⁷⁵ Cfr. MELLADO, Claudia and HUMANES, María Luisa, *op. cit*.

parallelism, political culture, freedom of speech); the cultural dimension (cultural values in the societies); and the media dimension (participation of the State in the media system, development of media market; and professional independence in the journalistic field, on both the individual as well as the structural level). For each one of them, we propose the use of specific indicators, which can be useful for the compared analysis of media systems, including the reality of new democracies.

In our opinion, the analysis of these factors will allow for more exhaustive comparative analyses, integrating the reality and context of countries which do not fit in the archetype of Western media systems in the international discussion and that, due to partial or exclusive characterization, have been made invisible.

It is also expected that future studies can retest the proposed dimensions and indicators through systematic empirical investigation that compares media systems and their influence in journalistic performance around the world.

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