MA MAJOR RESEARCH PAPER

Policy Wonk or Revolutionary?:
The Potential of Policy Intervention in Efforts to Defend and Foster Public Interest Media

Juana Berinstein

John Shields, Supervisor

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"Tired of being spoon-fed your news? If diverse media are democracy's oxygen, it's time to put Canada on life support..." (Excerpted from the Canadian Centre for Policy Alternatives direct mail fundraising campaign material.)

Introduction

The questions raised by the Canadian Centre for Policy Alternatives (CCPA) reflect a growing concern regarding the threat posed to democracy by both an increasingly corporate and market-driven media system in Canada and by a public broadcasting system that is under attack. However, despite the critical relationship between the media and democracy, these issues have been of relatively low priority for the left[1] in Canada. Unfortunately, the CCPA seems to reflect an all too common dynamic within the left, recognizing that a corporate stronghold on communication is a problem, but doing little to agitate for concrete change. While the CCPA letter raises concerns over the lack of balance in Canadian mainstream news and the limited and often skewed coverage of dissenting voices, a review of their website demonstrates that the CCPA has no specific campaign or policy project underway to advance alternative visions or to work towards democratic media reform[2].

Canada has the greatest concentration of private media ownership in the industrialized world (Rebick 2000:168). This is an alarming phenomenon for progressives working for social, economic and political change because it reduces the sites, scope and opportunities for ideas to be presented, discussed and developed. If democracies are meant to be characterized by self-

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[1] By the category 'left', I am referring to progressive social movements and politics, including the New Democratic Party, unions, progressive think tanks and progressive organizations and groups involved in social change work.

[2] The CCPA website can be viewed at http://www.policyalternatives.ca. Last accessed on April 9, 2004.

determination and the search for a common good, if democracies are meant to be the dynamic and constantly changing outcomes of ideas, desires, skills and needs of the people who comprise them, then surely forces that help shape the production of dominant ideas should be of great concern in a democratic context. Today, media are the main institutions of public exchange and therefore a critical site for the production of ideas, and an important political battleground (Bruck & Raboy 1989:12). Ideas affect how we organize society, the values we promote and the relationships we form; indeed ideas themselves are productive and a crucial political tool.

The policy changes that have allowed increased media concentration in Canada have not occurred in a vacuum. They have happened, and indeed are happening, in a context of neoliberalism driven by a commitment to the rule of the free market, privatization and the dismantling of the welfare state (Babe 1995, Burke, Mooers & Shields 2000, Rebick 2000). Under the rubric of neoliberalism, the involvement of the state in all sectors is being challenged, including in the communications broadcasting sector. Generally, the left has acknowledged the threat that neoliberalism poses to public goods and has attempted, with varying degrees of success, to mount fight-back campaigns in their defense. However, the left[3] has been generally slower to recognize mediated communication as something essential to the common good. In the past two decades, despite language in several policy documents to the contrary, the Canadian government has failed to recognize broadcasting as a public good, choosing to empower big media rather than a diverse public broadcasting sector, in the public policy process (Raboy 1992).[4] As market-driven media begins to overshadow public interest and democratic media, the

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[3] With the exception of some progressive academics and those involved in Canada's small media reform movement.
[4] In Canada, private radio stations dominate 68% the spectrum. For further statistical information see, www.crtc.gc.ca/eng/GENERAL/statistics/tab2004-2.htm.

left must not only raise questions about the impact this dynamic will have on democracy but also respond to it (Leys 1999).

The Canadian Radio-Television Telecommunications Commission (CRTC), the agency responsible for regulating broadcast media in Canada, despite what some see as a historical or official commitment to broadcasting that works in the public interest, has been undermined by neoliberalism (Audley 1994, Hogarth 2000). It is troubling to see communications policy in Canada cater to business, considering business has no particular impetus to work in the public interest or to concern itself with facilitating a fertile ground for participatory democracy. In the past two decades the CRTC, under federal governments that embraced neoliberalism, first under the Progressive Conservatives and then under the Liberals, has promoted a market model of communication, thereby enhancing the power of corporations which seek to turn broadcasting, information and ideas into commodities at the expense of maintaining these as public resources.

Attacks on broadcasting in the public interest are significant and require attention from the left. The left, which has already insisted that there are some things that are at their core a public good, like healthcare, education and water[5], should extend the list to include broadcasting. A diverse communication system is essential to participatory democracy. Further, private broadcasters would not be able to exist without using a public good - airwaves - to transmit their signals. By recognizing the impact of neoliberal policy on broadcasting, the left can connect media reform strategies to already existing work challenging neoliberalism.

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[5] The Toronto and York Region Labour Council for example, in conjunction with allies such as the Ontario Health Coalition and the Ontario Coalition for Social Justice, has undertaken campaigns to protect healthcare and water from privatization measures and to ensure that education is accessible and receives adequate public funds. Further

The research question driving this paper is: What opportunities and limitations exist within the policy process to defend and foster public interest media? The paper is divided into two major sections. Chapter One examines the theories of critical political economy and policy networks and argues that these two approaches offer useful analyses of power that reveal opportunities for progressive interventions. Chapter Two examines the CRTC's 1998 radio review, paying particular attention to the attempts of various actors, representing both economic and non-economic interests, to influence the CRTC's policy on radio ownership. Using critical political economy and policy networks theory, a detailed and contextualized picture of how power is exercised in the policy process is provided. In conclusion, it is argued that institutionally based policy intervention is an important tool for the left, but not adequate in and of itself, in efforts to defend and foster a rich and diverse public interest media.

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details on these campaigns can be viewed at www.labourcouncil.ca, www.web.net/ohc and www.ocsj.ca . Last accessed June 2004.

Chapter One: Critical Political Economy and Policy Networks

At the heart of any discussion of political change is the issue of power. In the first section of this paper, I explore two theoretical frameworks that offer useful insight into the nature of power and political change.

Deciding which theories to engage with when approaching any research topic is significant because the consequence of that choice is that particular questions are opened and others closed. In this paper I explore critical political economy and policy network theory. These theories are of interest because their ontologies allow for the possibility of social transformation led by progressive movements. For those interested in social transformation, ontology is important because, ultimately, it determines what is possible. For instance, ontology that takes the world largely as something that is given rather than made is of very limited use to those seeking political transformation directed by human agency.

a) **Critical Political Economy**

Critical political economy is an analytical approach that highlights the dialectical relationship between politics and economics. Dobuzinskis, Howlett and Laycock (1996) refer to political economy as a focus "on the relationships between the state and markets" and as an examination of "how power structures are shaped by these relationships" (5). Central to critical political

economy is a belief that the world and its constitutive structures (such as the capitalist economy) are made and re-made through dynamic social relations. As such, critical political economy can reveal opportunities for actors to affect change and highlight the difficulties and limitations that emerge for policy activism because of structural realities.

Overwhelmingly, but not exclusively, critical political economy is rooted in Marxism[6]. For Marx, economic relations were what dominated the world, or, in other words, what constituted people's political, social and cultural 'realities' and lived experiences. Marx emphasized the significance of the mode of production in shaping 'reality'. Marx and Engels wrote, "...as individuals express their life, so they are. What they are therefore, coincides with their production, both with what they produce and with how they produce. The nature of individuals thus depends on the material conditions determining their production" (1970:42).

According to Marx and Engels, there are real material realities such as private property and the existence of class differences that shape what is possible and how 'reality' is produced, reproduced and altered. For Marx, power is not something that can simply be possessed. Rather, power emerges through relations, and at the same time, constitutes relations. For instance, a capitalist is not powerful simply because she/he owns the means of production, she/he is powerful because of the relations that emerge as a result of the relationship between the owner and the worker(s) and the owner and the community that she/he is situated in. There is a dynamic in Marxist analysis between structural determinants and the social relations of production and struggle.

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[6] Not all political economy however derived from Marxist origins. For example, the work of Canadian Harold Innis or of the US-based Chicago School is rooted in a liberal, as opposed to a Marxist, tradition.

Antonio Gramsci, further developing an understanding of power rooted in historical materialism, conceptualized the role and function of power in advanced capitalism through the idea of hegemony. Gramsci understood hegemony, and relatedly power, as fundamentally relational. Gramsci's concept of hegemony sought to explain how power operated within advanced capitalist societies not as a relation based solely on force, but rather on the constant negotiation and renegotiation of consent and legitimacy that is influenced by material conditions, ideas and social forces (Gramsci 1972:12).

The concept of hegemony urges one to view power not as an object that is held by the ruling class, but rather as a relational dynamic. Thus, the ruling class and its institutions cannot simply take and hold power, but must constantly work to win and maintain the consent and support of civil society. John Fiske, in his book Introduction to Communication Studies explains hegemony as:

> ... the constant winning and rewinning of the consent of the majority to the
> system that subordinates them...Hegemony is necessary, and has to work hard,
> because the social experience of subordinated groups (whether by class, gender,
> race, age or any other factor) constantly contradicts the picture that the dominant
> ideology paints for them of themselves and their social relations. In other words,
> the dominant ideology constantly meets resistance that it has to overcome in order
> to win people's consent to the social order that it is promoting. So any hegemonic
> victory, any consent that it wins, is necessarily unstable; it can never be taken for
> granted, so it has to be constantly rewon and struggled over (1990:175).

Hegemony urges us to consider power as a complex process as opposed to a monolith or something that some posses and others do not. Gaining consent is a critical part of this process because a hegemonic power cannot solely depend on force, but must also appear to be legitimate

in the eyes of civil society to maintain its rule (Gramsci 1971:12). For historical materialists, power is a dynamic that emerges through particular relations in particular circumstances.

Traditional Marxists have insisted that economic relations largely determine social, economic and political reality. While Marx and Engels' emphasis on the significance of the ways in which humans are organized to produce the material basis for life is useful, it has also been criticized because its economic determinism fails to adequately account for the complexity of factors influencing power dynamics. Feminist and critical race theorists, for instance, have pointed out that various factors, such as race and gender, not simply class, affect human relations and the outcomes of these productive relations (Bakker 1998, McClintock 1995, Razack 1998, Wong 2001). Incorporating an analysis of various interconnected and inseparable social dynamics, such as those of race, class and gender, is of significant importance in our attempts to understand and transform exploitive institutions and practices.

Critical political economy approaches refute the idea that politics and economics are binaries. Instead, critical political economy attempts to illuminate the dynamic and mutually constitutive relationship between the political, economic, cultural and social.

Such an analysis of power as relational and dialectic reveals that there are many opportunities for progressive intervention. Furthermore, not only are those opportunities present, but also social transformation is itself a goal of critical political economy. Marx referred to this aspect of political economy as praxis. A commitment to understand and transform the world through praxis, which Mosco defines as "the free and creative activity by which people produce and

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change the world and themselves" is a fundamental component to critical political economy (Mosco 1996: 7). Therefore, critical political economy's ontology places social change at the centre of its work.

Critical political economy of communication stresses that communication (defined as the production and dissemination of ideas) produces, reproduces and alters our lived experiences. Thus, ideas are significant and are, in and of themselves, productive. This point figured in Marx's understanding that capitalism is dependent not just on material production, but also on intellectual production that maintains and is maintained by capitalism (Marx 1963:96). Critical political economy of communication then, takes up concerns and questions related to the production, content, and the interests represented in communication, as critical issues that need to be confronted by those interested in social change.

Given that ideas are productive and contain within them the possibility of both maintaining existing institutions and relationships or of challenging them, the question of who owns the media is significant. Assuming the owners of the media have an interest in maintaining the hegemony of capitalism and neoliberalism[7], the media is likely to be used as a mechanism with which ruling interests, be they government or corporate, may seek to 'manufacture consent' to policies that do not represent the interests of the subordinate classes - the majority of citizens

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[7] This is a reasonable assumption given that corporate media is legally obligated to generate a profit for its shareholders, not to provide a public service. Corporate media generates profit by creating a product that is consumed by audiences and then "sells' those audiences to advertisers (the commodification of the audience is an argument more fully developed by Dallas Smythe in Dependency Road: Communications, Capitalism, Consciousness and Canada). On private media's need to organize the symbolic world to promote capitalism see Graham Murdock's (2000).

(Chomsky & Herman 1988). The strongest critiques of corporate media (see for example Chomsky & Herman 1988 and McChesney 2000) have come out of the United States where the presence of public broadcasting is marginal. In Canada, however, we find that even though media ownership is more concentrated than in the US, the media landscape is more favourable to public interest broadcasting as a result of the prominent role of the Canadian Broadcasting Corporation (CBC). Whereas private media in the US may ignore a news story with consequences for the public interest, the CBC in Canada may cover it, and consequently, the private media may be pressured, in some instances, to cover the story as well[8]. Nonetheless, some significant challenges remain in the Canadian context. Firstly, the CBC is under attack, both by funding cutbacks and by private broadcasters (who argue that the CBC competes with private broadcasters for advertising revenue and therefore should not have privileged access to public funds). Secondly, public broadcasting in Canada is dominated by the CBC, and thus lacks a degree of multiplicity and diversity that may better serve the public interest. Multiple and diverse public interest media, such as community radio, are desirable because of their potential to increase people's ability to produce and disseminate ideas that challenge hegemony.

The application of critical political economy to an examination of communication systems and industries is significant in building a case with which to encourage the left and others to take an interest in communication. Nicholas Garnham, in his influential work calling for the application of political economy to studies of communication and culture, argued that the production of ideas (or what he commonly referred to as culture) is rooted in historical materialism (1990). Given that ideas, information and culture are produced and consumed in a capitalist context "the

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[8] For further information on news items ignored by corporate media see research by US-based Fairness and Accuracy In Reporting (FAIR) at www.fair.org or Project Censored at www.projectcensored.org.

development of political economy in the cultural sphere is not a mere matter of theoretical interest but of urgent practical priority" (Garnham 2001: 249). Democratic media and public interest broadcasting must be a political priority for those interested in social change because the success of our struggles – the ultimate ability to transform the relations of power across various and intersecting lines, will be dependent on our ability to produce and disseminate counter-hegemonic ideas and visions.

The CCPA's campaign mentioned at the beginning of this paper, for example, reflects a concern over the connection between hegemonic ideas and the media. Specifically, the campaign material expresses concern with the impact that ideologically-right motivated biased research has on the news media and on how the news media frame issues of public consequence. Given the role of the media as a site where consent and legitimacy are fought over, the ability of the media to act in the public interest, free of corporate bias, should be a grave concern to those interested in counter-hegemonic struggles.

Critical political economy of communication has demonstrated that communication under capitalism is not a tool for citizen empowerment, but rather a commodity (Golding & Murdock 1996, Garnham 1986). The conversion of communication into an industry within capitalism, especially in light of a recognition that the media functions as a key site where consent and legitimacy are struggled for and contested, is a distressing dynamic for those interested in progressive change.

Once commodified and commercialized, ideas and information are packaged for consumption. Consequently, people are not involved with the production and exchange of ideas as citizens, but rather as consumers of commodified ideas and information. Furthermore, commodification is a process by which a product (or an idea) becomes alienated from those that produce it. The process of commodification not only masks those responsible for the production and dissemination of the 'idea' but also those who consume the idea.

Critical political economy seeks to examine ways in which communication can work in the interest of citizens and in the process of progressive social change. Autonomous, transparent and state-supported public broadcasting systems, for example, are models capable of contributing to such goals (Bruck & Raboy 1989). There are numerous characteristics that distinguish public broadcasting from commercial industries. Public broadcasters are not-for-profit, they are not legally or financially responsible to their shareholders, they are accountable to a public body and they have a specific mandate that they openly attempt to fulfill (Salter 1988:234). Without romanticizing public broadcasters[9], it is important to assert that differences between public and private broadcasters are significant. Furthermore, in recognition that the world is made and not given, critical political economy of communication opens up opportunities not only to develop critical insights into the role of communication in progressive change but also to defend, foster and renew diverse systems of communication that work in the public interest.

Empowering citizens as actors within a participatory democracy, a democracy in which people are equipped with the material and intellectual resources with which to shape their lives, is the impetus behind public interest media. Critical practices urge us to conceptualize the public

interest as autonomous from both the market and the state. While public interest media may be state supported, the key is to ensure that the media are accountable to the public and not a mouthpiece for the state or private corporate interests. Public media and state media are not interchangeable concepts. It is in the public interest to defend and foster decentralized public broadcasters, access to information and ideas and media that is grassroots, autonomous and/or community-based (Raboy 1992: 241). One of the key goals of public interest media is to guarantee the *fair* flow of ideas and information and not simply the *free* flow of ideas (a concept often promoted by supporters of neoliberalism). Neoliberal concepts of the *free* flow of ideas tend to be associated with issues of market access. For example, neoliberals argue that access should be guaranteed by a free market unimpeded by government regulation or intervention. Similarly, questions of access within a neoliberal framework are largely quantitative (for example, how many televisions or radios are present within a household?) as opposed to the qualitative questions raised by critical political economists (for example, what ideas are being disseminated and whose interests do they serve?). Thus, neoliberal approaches to the free flow of ideas tend to enable the flow of ideas of those who can access the market, not a fair flow of ideas that enable and empower citizens to participate in democracy.

As has been discussed above, commercial media poses particular conceptual and practical problems for those concerned with social justice and participatory democracy. Public interest media on the other hand creates increased opportunities for people to use communication in movements for social change.

b) Policy Network Theory

[9] Public interest media is still affected by the dominant power relations in society.

In this section, I define policy network theory and explore its contributions and challenges to policy studies in Canada. Inherent in my examination of policy network studies is a proposed methodology that will be applied to a case study in Section II. Further, I argue that policy network theory and critical political economy, when viewed in a complimentary way are useful in exploring the limitations and opportunities of policy intervention as a tool for progressive change.

Before delving into policy networks, which represents just one of many approaches to public policy studies, it is important to establish a working definition of public policy. Public policy can be defined as decisions about an issue, within a particular time frame and jurisdiction, which are infused with a public interest and where there is an expectation that governments will be involved (Salter 2002). Put simply, in a media context public policy are the rules that shape who is able to produce media, how they produce it, what they produce and how it is disseminated.

Governments are in many ways a sum of their policies. Given that the role of government is to ensure the well being of citizens, policies offer one important tool with which to measure the responsiveness of governments to the needs of citizens. However, discrepancies often arise between policies and their effective implementation. For those interested in social change, the policy process can provide an important, albeit limited, mechanism to propose alternatives. Policies tend to reflect the specific social, political and economic context they are rooted in. Indeed, an examination of context is paramount to any study of policy.

Some authors in the field of policy studies (such as Doern 1978) insist that the state is the primary actor to define an issue or problem, to envision possible responses, and to ultimately respond to (or ignore) any given issue or problem. Such mainstream approaches offer limited opportunity to explore the potential of progressive policy interventions. Policy network theory in addition to its emphasis on the role of the state, shares a similar analysis of power as critical political economy in that it accounts for and considers multiple forces in the policy process. This is particularly relevant in an exploration of the ways in which the left can use the policy process as a tool for social change.

Communication policy is a concern for those interested in defending and fostering public interest media because the policy process directly affects the structural makeup of the media. As just one example, policy determines how much spectrum space is allocated to public broadcasting versus privately owned radio. Numerous authors have extensively researched communication policy and have concluded that effective public policy is indeed necessary to defend and foster public interest media (Salter 1988, Raboy 1992, Audley 1994, Aufderheide 1999, Hogarth 2000, McChesney 2000).

Since the field of policy studies emerged in the 1970s in Canada, mainstream approaches have situated the state as the central player in the policy process. Under this rubric, the state is conceptualized as possessing the autonomy and capacity to create and implement policy. However, policy network theory challenges these notions of the state by demonstrating that in fact, the policy process is more nuanced and involves a number of actors, often with conflicting interests. Policy network theory also emphasizes the equally important relationships between

various actors. The policy network approach to policy studies is "a concept that describes the properties that characterize the relationships among the particular set of actors that forms around an issue" (Coleman and Skogstad 1990: 26). Furthermore, policy networks, unlike mainstream policy studies, accounts for how, by whom and with what result influence is exercised in the policy process.

As a result of its recognition of the diverse forces attempting to influence policy, policy network approaches challenge the idea of an autonomous state. Coleman and Skogstad (1990) argue that policy network theory understands the state as disaggregate. Indeed, a plural state is particularly the evident in Canada's federalist political structure. In other words, the policy directives and intentions of the state vary across issue and sector, and do not simply represent one hegemonic interest without regard to the specific issue and/or sector that is being affected by a specific piece of public policy.

While mainstream policy studies focus on the micro, that is, on a decision made or not made by the state), policy network studies, as a result of its emphasis of various actors and on the effects of policy, works on a broader sectoral level. It attempts to not only capture the official details of the public process itself, but also the various connections between the official process (for example, the process that exists at the governmental level, whether through public hearings, consultations or ministerial meetings) and the various actors (for example industry or public interest groups) who attempt, in varying ways, to affect public policy. This approach illuminates dynamics that may go undetected in micro approaches to policy studies, such as the differences in the organizational capacity of various policy actors and/or the different levels of access that

various actors enjoy in the policy process.

Policy networks theory provides an analytical and methodological approach to policy studies that focuses on the capabilities of both state and societal actors in a given sector and on the relational dynamics that exist among them (Coleman and Skogstad 1990:v). Policy network theory examines the behaviour of actors in the policy process and seeks to account for the ways in which actors are shaped by their structural positions. Secondly, it emphasizes the relational component and the institutional dynamics that affects the policy process. In doing so, it reveals that a policy decision does not simply hinge on the state, but rather on the relationships between state and societal groups that represent both economic and non-economic interests.

c) Critical Political Economy and Policy Networks: Complimentary Approaches

The application of policy networks theory is most useful in looking at specific policy case studies. It allows a thorough and detailed analysis that can account for complexities, nuances, and contradictions that may be overlooked by a macro approach, such as critical political economy. However, the relevancy of policy networks is not fully appreciated by viewing each policy decision in isolation, but rather by juxtaposing it against broader historical, material and ideological considerations. This juxtaposition is important not only in assessing the impact of a policy decision, but also for explaining the conflicts that arise between various interests in the policy process. Together, critical political economy and policy network theory allow us to move dialectically between a close-up and a bird's eye view of policy.

Specifically, critical political economy understands conflicts in the policy process as a reflection of dynamics that are rooted in a specific historical socio-economic moment. Policy reflects rather than escapes the general ideology of society (McBride 1996:59). Indeed, in the face of critical political economy's ontology that social change is ubiquitous, it helps us understand why policy, and the interests it reflects, matter.

At first glance, it may seem as if the argument being presented opposes policy network theory and its premise that the state is disaggregate. If on one hand it is argued that policy reflects a state committed to neoliberal hegemony, how then could it also be argued that the effects of the state vary across sectors and issues?

Earlier in this essay, hegemony was examined as a process of negotiation between the state and civil society in advanced capitalism. Further, it was argued that the capitalist state must constantly work to build consent and legitimacy for its actions - and its policies. Through the dynamic process of building and rebuilding hegemony then, the state is in essence compelled to respond to various pressures and demands. Similarly, policy network theory argues and demonstrates in detailed studies, precise ways in which pressure and demands are placed on the state. Indeed, both critical political economy and policy network theory agree that the state is not autonomous. Critical political economy argues that the state is in constant negotiation with and through civil society. Policy network theory argues that various actors attempt to influence the state in specific ways with varying degrees of success. Thus, as opposed to contradicting each other, critical political economy and policy network theory can be used in complimentary ways. Furthermore, these complimentary understandings of the state highlight and reinforce power as

relational, thereby opening up possibilities for affecting change.

Given that the state is not autonomous and that it is susceptible to being influenced by outside forces, those interested in progressive change are not only concerned with effectively bringing demands and concerns to the state or to the policy process but also with the ability of opponents to do the same. Here again there is further evidence of the complimentary nature of critical political economy and policy network theory. While policy network case studies explore the detailed ways in which relational dynamics are played out and power is exercised, critical political economy can further illuminate this through the concepts of co-optation and structural inequities. There is a danger in examining policy too closely or in isolation. However, analyzing the policy process of a series of decisions over a period of time can reveal important trends - trends that can be understood through critical political economy.

Chapter Two: A Case Study of the CRTC's 1998 Radio Review

Above, critical political economy and policy network theories were described as complimentary approaches. Together, these approaches provide useful theoretical tools with which to examine the potential of public policy interventions as a means with which to protect and foster media that works in the public interest.

The purpose of this section is to rely on a case study as an opportunity to examine the potential of policy intervention as a progressive tool in the struggle for public interest media. I will examine the major organized interests that attempted, with varying degrees of success, to influence the CRTC's 1998 radio review[10]. Specifically, I will examine the policy recommendations pertaining to issues of ownership as articulated by diverse policy actors. Ownership issues provide an interesting terrain within which to examine the policy process because there are clear and opposing perspectives from policy actors and furthermore because of the significance of media ownership for counter-hegemonic struggles.

Ownership liberalization – relaxing the rules that determine the number of radio stations that any one company can hold – was a central issue in the 1998 CRTC radio review. Following the review, the CRTC announced a number of significant changes to its regulation of commercial radio – which will be discussed below[11].

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[10] A four-day public hearing was held in December 1997. Thirty-five parties made oral presentations at the hearings. In early 1998, the CRTC concluded its commercial radio review by making several changes to its commercial radio policy.

This section provides an overview of diverse policy actors, including the state, commercial radio or economic actors, and public interest or non-economic actors. Given that the state mandates the CRTC to regulate radio broadcasting in Canada, this section begins with a critical overview of the CRTC and its role in the 1998 radio review. Following, the role of economic and non-economic actors in the 1998 CRTC radio review is examined, using public hearing transcripts and submissions to the CRTC by respective parties as data.

a) The State as a Policy Actor and the CRTC

As discussed earlier, policy network theory encourages us to specify how the state is present in a specific policy decision. In the arena of broadcasting policy, the state is represented through the CTRC. Given concerns about government censorship and control in liberal democracies such as Canada, the state has attempted to ensure that broadcasting works in the public interest and is not subverted by state or business interests. The creation of a *Broadcasting Act* (last revised in 1991) and the creation of the CRTC as an independent regulating agency are meant to accomplish such tasks. Hence, the CRTC is set-up as an arms-length body from government in order to award it a greater degree of independence than would be found in policy processes directly ensuing from and changing with the elected government of the day.

The CRTC was established in 1968. It describes itself as "an independent public authority"[12]. The Commission reports to Parliament through the Minister of Canadian Heritage. Obtaining its authority from the *Broadcasting Act*, the CRTC is mandated with ensuring that ownership,

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[11] See CRTC public notice 1998-41. The notice can be viewed on the CRTC website at www.crtc.gc.ca/archive/ENG/Notices/1998/PB98-41.HTM. Last accessed on April 6, 2004.
[12] See the CRTC website at http://www.crtc.gc.ca/eng/about.htm. Last accessed on April 9, 2004.

control and programming of broadcasting reflect Canadian interests. Section 3(1a,b) of the

Broadcasting Act states:

> ...the Canadian broadcasting system shall be effectively owned and controlled by Canadians; the Canadian broadcasting system...comprising public, private and community elements, makes use of radio frequencies that are public property and provides, through its programming, a public service essential to the maintenance and enhancement of national identity and cultural sovereignty.

Furthermore, the *Broadcasting Act* states that the broadcasting system should "provide a reasonable opportunity for the public to be exposed to the expression of differing views on matters of public concern" (*Broadcasting Act* 1991 Section 3[1i]). The CRTC aims to accommodate the mandate of the *Broadcasting Act* by developing policy, making regulation, and issuing licenses.

Radio regulation was born out of necessity. The use of limited radio frequencies had to be organized and enforced in order to prevent radio signals from being accidentally or purposely interfered with from other broadcasts. Additionally, as mentioned above, the *Broadcasting Act* recognizes two other important reasons why radio must be regulated. The *Broadcasting Act* states that the Canadian broadcasting system "...makes use of radio frequencies that are public property" and secondly, that it "provides, through its programming, a public service..." (*Broadcasting Act* 1991-3(1)b). Essentially then, regulation is meant to ensure that broadcasting meet public interests, not merely private profit motives.

Licenses to operate a radio station in Canada are awarded and regulated by the CRTC. Radio stations are classified under three categories. These include, i) private stations, owned and

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operated for profit, ii) community and campus radio stations operating under a public mandate and managed by community members on a not-for-profit basis and iii) national state-funded public broadcasting, the Canadian Broadcasting Corporation (CBC).

Numerous studies have questioned the autonomy of the CRTC from both the government of the day and from industry suggesting that government agencies become captive to the very industries that they are intended to regulate. The CRTC's capacity to ensure adherence to the *Broadcasting Act* has also been challenged (Audley 1994, Doern 1978, Hogarth 2000, Meisel 2001 and Raboy 1992). There are several ways and reasons why the autonomy of the CRTC may be compromised. For example, Ministers from Heritage Canada and Industry Canada can wield significant influence in the policy process. They approve briefs sent to Cabinet. In doing so, the ideas and issues they allow to be articulated and brought to Cabinet have significant ability to shape the questions and debate surrounding a particular issue which is of great relevance because Cabinet can direct the CRTC on broad policy questions (Raboy 1995:415). As numerous studies of the policy process in Canada have demonstrated, the CRTC is also influenced by the industry it is meant to regulate[13]. Doern argues that the structure of the CRTC, specifically its close links with the industry it is meant to regulate, may make the CRTC vulnerable to industry capture (1978:29). Questions of state agency autonomy vis-à-vis the industry it is regulating are critical in an examination of policy networks because they may reveal that the state and its regulatory agencies are not simply autonomous, but that a more complex and nuanced relationship exists between the state, regulatory agencies and industry.

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[13] See for example Raboy's "Influencing Public Policy on Canadian Broadcasting" (1995) and Audley's "Cultural Industries Policy: Objectives, Formulation and Evaluation" (1994).

Critiques of the CRTC as an agency that is not accountable to the public or as an agency that has been captured by industry are particularly troubling, given that the CRTC is meant to protect public resources (such as airwaves), public interests (such as cultural sovereignty) and to enable access to diverse opinions on matters of public concern.

However, Salter argues that simply focusing on issues of accountability and capture when examining the role of a regulator overlooks the critically important issue of the internal dynamics of the agency (1993:99). For example, Salter describes the internal dynamics of the CRTC as contradictory. On the one hand, the CRTC claims to work in the public interest and on the other it regulates private industry in ways that are beneficial to the industry's economic interests[14]. Salter argues that these internal contradictions emerge when relationships between the regulator and the regulated industry are based on mutuality and reciprocity (1993:90). As Salter observes:

> The fulfillment of the regulatory mandate requires co-management if it is to be successful, yet to the extent that co-management orients the agency primarily to the regulated industry, it places the public-interest mandate of regulation into jeopardy. The regulator appears to be 'captured' by the industry – and often is (1993:92).

Salter is concerned that if we simply pay attention to who is able to capture an agency, without also giving attention to the ways in which the agency is structured to allow for such capture, we not only misunderstand the problem but we neglect to see opportunities to effectively challenge this capture. Thus, Salter's argument reminds us that if progressives seek to ensure that agencies are not captured by industry, that progressive critiques of agencies could focus on potential reform mechanisms to ensure that agencies work in the public interest. Indeed, agency reforms

may be a more feasible approach than advocating for the dismantling of an agency, especially since this scenario would lead to a complete lack of government regulation, essentially allowing industry free reign.

The current co-management relationship between the CRTC and industry raises particular concerns for the left. In essence, co-management limits the ability of the CRTC to defend the public interest, especially in situations where the public interest threatens or competes with industry's interest (Salter 1993:91). Thus, defending and fostering the public interest in broadcasting would demand both reforms to the CRTC as well as policy advocacy efforts. Progressive reforms that strengthen the role of civil society in the policy process could include, for example, empowering civil society with the resources and skills to effectively intervene in the policy process.

Regulators may also become dependent on non-government actors in the policy process to fill in gaps in their own capacity to do research. Referencing the Canadian policy arena, Bakvis says, "[O]ne way of dealing with the gaps in the policy-operations area is to rely on outside experts, whether investment bankers, management consultants or former civil servants" (2000:94).

Interestingly, the CRTC shut down its research department in 1984 (Meisel 2001:221). It is not unreasonable to assume that since that time, the CRTC is reliant on research from non-governmental policy actors, and that given the differences in resources between industry and public interest groups, this creates an exceptional opportunity for industry-based research to

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[14] Industry has done well financially under the CRTC. See for example John Meisel's "Stroking the Airwaves: The Regulation of Broadcasting by the CRTC" in Craig McKie and Benjamin Singer (eds) Communication in Canadian

inform the work of the CRTC. Certainly in my analysis of the 1998 radio review hearings the

CRTC seemed to rely on and privilege industry research. Indeed, the loss of the research

department and the CRTC's privileging or dependence on industry research throws into question

the autonomy and capacity of the CRTC. The function and role of the CRTC in the policy

process, as well as its relationship to non-government actors who wish to influence its policies

and regulations on a particular issue, are important considerations in the study of policy

networks.

Within these observations and critiques about the role of the CRTC it is important to turn our

attention to the CRTC's specific role in the public hearings for the radio review in 1998.

Francois Bertrand, CRTC Chairperson, Garth Dawley, CRTC Commissioner, André Wylie,

CRTC Commissioner and Charles Bélanger, Vice-Chair of Broadcasting at the CRTC facilitated

the public hearings. They were able to ask the participants questions as well as decide how much

time each participant was allotted. The Chair and Commissioners attempted to frame the public

hearings as a decision-making space in which all voices present would have equal power in

determining the policy outcomes. Bélanger said "[T]ogether, and I repeat, together, we will try to

determine whether we are still using the most appropriate tools to ensure that the objectives of

the *Broadcasting Act* are met" (CRTC 1997:v1,1-2).

Bélanger reconfirms the notion that all voices are equal, however, simultaneously presenting a

contradiction and revealing a bias in favour of industry. Elsewhere in the hearing, Bélanger

states:

With the help of all parties, the Commission will consider what are the best means *to ensure the financial well being of the radio industry* (emphasis added). In weighing the various options however, we must bear in mind that the primary objective of this exercise is to provide the basis for strengthened cultural contributions by the industry towards attaining the objectives of the *Broadcasting Act* (CRTC 1997:v1,3).

The industry bias is evident again after the CAB presentations, with Bélanger's comment that "we definitely need to bring a stronger profitability [to radio]" (CRTC 1997:v1,52). Carolyn Pinsky's (CRTC staff legal counsel) comments are also revealing. Following the presentation by major-industry player, Rogers Broadcasting; Pinsky said, "[Y]ou are certainly considered as one of the largest groups in the nation...and this is a great achievement, and we are looking for...ways to continue and maintain what we have developed together" (CRTC 1997: v2,8).

Furthermore, as can be seen from Bélanger and Pinsky's use of the word "we", there is an implicit assertion that the CRTC and industry are allied. As a result, the autonomy of the CRTC and the capacity of the state to ensure that industry meets the public interest obligations of the *Broadcasting Act* are undermined. Furthermore, these links are not simply observable in the comments of the CRTC staff but also in the connections between CRTC staff and industry and the movement of human resources from the CRTC to industry and vice-versa. At one time, for example, Charles Bélanger was the CAB's TV Board Vice-Chair[15]. Tony Viner, the spokesperson for Rogers Broadcasting jokes, "I remember you as a flinty-eyed CFO[16], Vice-Chair Bélanger"[17] (CRTC 1997:v2,17).

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[15] The role of Bélanger in CAB's executive structure is acknowledged in a CAB news release dated October 1996. The press release can be viewed at http://www.cab-acr.ca/english/media/news/96/nr_violence.shtm. Last accessed on April 9, 2004.
[16] [Chief Financial Officer]

Not only can one detect a close and familiar relationship between the CRTC and industry, one can also detect blaming non-industry as being responsible for creating conflict or preventing consensus from taking place. After the Canadian Independent Recording Production Association (CIRPA) presentation, which spoke against CAB's ownership liberalization proposal, Bélanger, challenging the legitimacy of the submission of CIRPA (in contrast to CAB's), wonders how CIRPA can challenge the CAB submission given CAB's "proof" that ownership liberalization is desirable. He says, "I am a bit worried, and this is just a personal observation, that with a fairly well documented file with respectable studies and knowledgeable people" [that CIRPA would still contest that ownership liberalization is the right policy direction to follow]" (CRTC 1997:129).

Bélanger's remarks again reveal collusion between the CRTC and industry. Responding to CIRPA's criticism that the CRTC does not adequately involve or consider the needs of the people as a public constituency and not as a market to be sold to advertisers, Bélanger responds, "as our colleagues [CAB] here are saying it's [the radio industry is] already highly fragmented. We are all competing for the same dollars" (CRTC 1997:129). Bélanger implies that given the competitive relationship between broadcasters for audiences, people must be seen as markets, not as public constituencies. Further, his remarks suggest a priority to regulate in such a way to maximize industry's profit.

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[17] A CAB press release from October 1996 confirms that Charles Bélanger was the president and chief officer for CFCF Radio Group Inc. in Montreal. The release can be viewed at http://www.cab-acr.ca/french/media/news/96/nr_board.shtm. Last accessed on April 9, 2004.

The CRTC played an administrative role in the 1998 radio review. For example, it provided a venue for deputations, chaired the hearings and determined how long each presenter was heard[18]. Also, as has been noted in some of the above excerpts from the hearings, the CRTC, through the questions and comments of Commissioners and staff were able to influence the tone of the hearings, at times showing direct approval of perspectives that favoured ownership liberalization. However, the CRTC's role was not simply administrative. The CRTC's structure, in particular its tendency towards industry co-management, privileges industry actors over non-industry actors in the policy process.

Having discussed the role of the CRTC, I will now examine the non-government actors, economic and non-economic, and their roles in the CRTC's 1998 radio review. Following my description and examination of the actors, I will provide an analysis of the points of conflict between actors pertaining to ownership liberalization. My analysis will draw on critical political economy and policy network approaches to determine how, by whom and with what result power was exercised at the hearings. Based on this analysis, I will comment on the opportunities and limitations for progressives to influence the policy process in defense of public interest media.

b) Industry Actors

Industry actors at the hearings included those who were advocating for policy and regulation that directly benefited their economic interests. They included private radio owners and operators as

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[18] Most policy actors for example were limited to ten minute presentations, with the exception of CAB and CIRPA, which were allowed considerably more time, in "recognition of the leadership role" these two organizations play (CRTC 1997:v1,7).

well as the CAB. Industry actors at the hearings quantitatively outnumbered non-industry actors at the hearings, accounting for twelve of the English-language presentations compared to three non-industry presentations (that spoke to the issue of ownership liberalization). However, industry groups were not always in agreement concerning ownership liberalization. Industry actors were divided into two camps, those who supported the CAB's proposal, which will be outlined below, and those who did not. The majority of industry actors, ten of twelve, supported ownership liberalization.

Before discussing the positions of individual operators and owners who spoke at the hearings in detail, I will describe and discuss the role of the CAB. The CAB played perhaps the most central role of all industry actors. For example, the CAB speaks on behalf of its membership – private radio broadcasters and operators. It is able to use its financial resources to claim legitimacy by bringing reports and experts to the policy process. Furthermore, the CAB, given its resources and its preferential role in the CRTC hearings, set the very parameters of the ownership liberalization discussion. The other policy actors, including the CRTC, conducted the hearings in reference, support or opposition to the CAB's proposal[19]. Compounding the CAB's privileged position in the policy process in comparison to other actors, is the CAB's regular and routine access to CRTC staff and Commissioners to a degree that is unrivaled by non-industry advocates (Raboy 1995:425, Salter 2003).

Michael McCabe, the resident and chief executive officer of the CAB, was its lead presenter at the hearings. The CAB delegation also included two other members of the CAB executive as

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[19] CAB advocated relaxing ownership rules to allow companies to own two AM and two FM stations in any one market (up from the current regulation of one AM and one FM station).

well as Scott Cuthbertson, a financial analyst with TD Securities Inc. (a company that financed radio consolidation in the United States) and Herb McCord, president and CEO of Granum Communications Corporation. Cuthbertson and McCord specifically spoke to their perceived success of radio ownership liberalization in the United States (CRTC 1997:v1, 10). Cuthbertson also submitted a report to the CRTC entitled "Revitalizing the Canadian Radio Industry: A Financial Review". The CAB's deputation to the CRTC focused on the CAB's desire to ensure that the CRTC "significantly change the ownership structure of radio to strengthen it and make it profitable" (CRTC 1997 v1, 13).

Apart from the CAB, eleven other industry actors spoke at the public hearings. These included Standard Radio, Nornet Broadcasting, Golden West Broadcasting, Music Lane, Blackburn Radio, Rogers Communications, Shaw Radio, WIC Radio and CHUM Radio. All but two, Durham Radio and Rawlco Communications, spoke unreservedly in favour of CAB's ownership liberalization proposal. Below is a brief review of some of the industry actors and the key points in their submissions because their arguments were generally similar to the ones presented by the CAB, the content of their submissions will not be discussed in any detail. Later in the paper an analysis will be provided of how power was exercised by both industry and non-industry actors.

Standard Radio owned two large market stations in 1997, CFRB and Mix 99.9 in Toronto. Gary Slaight, president of Standard Radio, argued that the CRTC should support the CAB's proposal for ownership liberalization for four reasons: i) the current policy was outdated, ii) the radio industry was in economic crisis and ownership concentration would strengthen the economic

viability of all radio stations and iii) ownership concentration would increase diversity in programming (CRTC 1997: v1, 58-59).

Rogers Broadcasting Ltd., a large player in the radio industry, owned nineteen stations in 1997 in Ontario, Manitoba, Alberta and British Columbia. Tony Viner, Vice-President, and an additional team of five senior officers from Rogers were present at the hearings. Elmer Hildebrand represented Golden West Broadcasting, a large operator of small market stations (that broadcast to rural and low density areas), at the hearings. Golden West owned eleven stations across the prairies in Manitoba, Saskatchewan and Alberta in 1997. Golden West focused solely on radio broadcasting. Sandy Green, president of Blackburn Radio Inc., spoke for the company at the hearings. Blackburn operated numerous radio stations in Southwestern Ontario in 1997. Nornet Broadcasting owned 15 small market radio stations in 1997, mostly on the AM band, in rural areas in Alberta and northern British Columbia. Hugh McKinnon, president of Nornet, spoke in favour of ownership liberalization but asked the CRTC to protect AM band stations and to privilege applications for new frequencies to radio-specific companies (CRTC 1997: v1, 133). McKinnon argued that such protections would enable the "emergence of regional broadcasters" and that this would ensure service to rural areas (CRTC 1997: v1, 133). As will be discussed on further detail below, all of these industry actors spoke with unreserved support for the CAB position.

However, as previously mentioned, not all industry actors in the policy process supported CAB's proposal for ownership liberalization. Rawlco Communications and Durham Radio, both expressed concerns and cautioned the CRTC against CAB's proposal.

Rawlco Communications Ltd., operated 11 radio stations in large markets such as Ottawa and Toronto in 1997. Rawlco exclusively owned and operated radio stations. Gordon Rawlinson, president of Rawlco, and three other senior officers presented at the hearings. Though members of CAB, they did not support consolidation (CRTC 1997 v1, 171) because they did not agree that consolidation needed to take place to make the larger radio markets more profitable (CRTC 1997 v1, 183). Interestingly, Rawlco expressed reservations to the CAB's position because it feared being over-powered in the market by larger companies that operated diverse media holdings, as opposed to their sole focus on radio. While expressing reservation to the CAB's proposal, their position was nonetheless motivated and informed by their own economic interests. In Rawlco's interventions, no concern was expressed for ensuring that radio broadcasting defend and foster the public interest.

Douglas Kirk, the owner of Durham Radio that operated stations in Ajax and Chatham, was the only private industry actor to acknowledge the importance of a private/public balance in radio in Canada, although how he, as a private radio owner would define such a balance was not articulated and could potentially differ significantly to a progressive definition. Kirk also expressed concerns regarding ownership liberalization and the use of the United States experience with ownership liberalization as a model for Canadian radio (CRTC 1997: v2, 3,6).

In addition to industry actors, non-industry actors were also present at these hearings.

c) Non-industry Policy Actors

There were only three non-industry actors that participated in the hearings compared with eleven industry actors. The non-industry actors were the National Campus and Community Radio Association (NCRA), the Canadian Independent Record Production Association (CIRPA) and Friends of Canadian Broadcasting (Friends).[20]

John Stevenson represented the NCRA at the public hearings. The NCRA is a national, non-profit organization representing community-oriented broadcasting and advancing the role of community radio in Canada. The NCRA did not support ownership liberalization, citing concern about the impact that consolidation in the private industry would have on the entire radio dial in Canada. Stevenson said:

> We have chosen to create an alternative kind of radio because, at the very least, we are profoundly uncomfortable with the notion that we are regarded simply as a market which can be delivered to advertisers....But even though we have decided to make something different in non-commercial radio, we understand the fact that commercial radio sets much of the agenda for radio in Canada and that changes in regulations for commercial radio have significant impact on the types of programming that we present and how we generate revenue (CRTC 1997: v2, 41).

Further, Stevenson expressed a collective concern from his membership that "we are beginning to lose the balance which makes Canadian broadcasting so unique and effective", reminding the Commission that the *Broadcasting Act* states that broadcasting will consist of three sectors, *public*, private and *community* (CRTC 1997: v2, 46).

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[20] The CBC was not at the hearings because they are a federally sponsored broadcaster and hence would be deemed an inappropriate actor in this arena.

Brian Chater, the president CIRPA, spoke indirectly against ownership liberalization by critiquing the CRTC for its concern over the financial profitability of private radio at the expense of the mandate of the *Broadcasting Act*. Chater said:

> We have reviewed Section 3 of the *Broadcasting Act* in some detail and nowhere do we see any reference to the fact that it is mandated that broadcasters make money...or that the accounts of individual stations be kept private even though these are airwaves owned by the Canadian public. Therefore, CIRPA asks itself the question, how is it that all of these practices have become established over the years? (CRTC 1997: v2, 27).

Friends of Canadian Broadcasting (Friends) are a national voluntary organization that supports public broadcasting and attempts to speak on behalf of the users of media. In the opinion of some of the pro-industry voices surrounding the CRTC review of radio ownership rules, Friends was acknowledged as an adversary. One pro-industry journalist covering the hearings referred to Friends as a "band of handwringers" (Taylor 1997:20). Similarly, Friends also directly positioned itself as an adversary of CAB. In their submission to the CRTC, Friends urged the CRTC not to allow a relaxation of ownership rules. Of all non-industry actors, Friends was the most strident opponent of ownership liberalization. The Friends' submission to the CRTC states:

> Stripped of its rhetoric, the CAB's proposal for multiple license ownership comes down to this – big is better, and only for big players....CAB is re-positioning itself as a Canadian Association of "Big" Broadcasters. It is representing the interest of large interests who want to carve up Canada in the style of cable monopolies (Friends 1997).

In fact, much of the Friends' submission to the CRTC directly engages with, opposes and criticizes CAB's policy recommendations. This dynamic is reflected in the following excerpt: "Friends see a continuing pattern in the CAB's behaviour before this Commission over the past two decades. That pattern is to argue for de-regulation on the basis of unprofitability" (Friends 1997).

Public interest groups depend on public consultations to gain access to the policy review process. Without the public process built into the CRTC, non-industry actors would be virtually shutout of policy making. However, we should not overestimate public consultations, which only offer a limited in-road into influencing policy, especially given the limitations faced by non-industry groups, such as limited resources and a lack of regular and routine access to the centres of power in the policy process. Furthermore, those interested in participating in the policy process in order to defend or foster the public interest are industry outsiders, and as a result they tend to have less influence on the decision-making apparatus and less preoccupation with free markets and deregulation (Raboy: 425).

d) Points of Conflict Between Policy Actors

At the CRTC's public hearings, numerous points of conflict arose between the policy actors concerning media ownership and specifically the liberalization of ownership rules. Following is an examination of the key points of conflict and the positions of industry and non-industry actors using examples from the presentations and submissions at the CRTC hearings. The key points of conflict include: i) the financial profitability of private industry; ii) local programming; iii) protection for small radio owners and operators; iv) the trend of consolidation in all media sectors; v) US radio concentration as a model for Canada; vi) contested definitions of diversity; vii) the link between content and ownership; vii) corporate evasion of CRTC policy and viii) regulation and contested understandings of 'public'.

Following is an examination of the points of conflict through the lens of policy network theory and critical political economy theory. Following a discussion of the conflicts, an analysis of how power was exercised will be offered, as well as an examination of the opportunities and limitations for progressive interventions in defense of public interest media.

i) The Financial Profitability of the Private Industry

Overwhelmingly, industry actors argued that the rules and regulation set in place by the CRTC had to address the financial 'crisis' of the radio industry and allow for future economic growth. CAB argued that without more relaxed ownership rules, the radio industry was simply doomed. In their written submission to the CRTC, they stated:

> Half of Canadian private radio stations have been unprofitable since 1990 and the current ownership regulation of one AM and one FM station per owner, per market has resulted in a highly fragmented industry. Fragmentation means radio can't deliver the kind of concentrated audience reach that advertisers want. Current regulations limit radio's ability to compete and return to profitability (CAB 1997).

Similarly, Cuthbertson, a member of the CAB delegation, said: "What is most important is that there is profitability, that there is financial growth…and whether that is a move from 7% to 9% next year, but with a clear vision that keeps going up" (CRTC 1997:v1, 56).

McCabe, also with the CAB delegation, claimed, "…[W]e are a pretty small industry. We have got to get bigger" (CRTC 1997: v1, 73). Green, of Blackburn Radio, echoed the position of Cuthbertson and McCabe and added a prescription for profitability. She said, "…[W]e believe a liberalized approach to multiple ownership of stations…proposed by the CAB, can be a key factor in helping radio stations, not only survive, but to thrive" (CRTC 1997:v1, 205).

Chater, of CIRPA, questioned industry's claim that they were in financial trouble and needed

ownership liberalization measures to rescue the industry from economic crisis. He said:

> ...the continuing emphasis that the CAB and broadcasters place on the so-called financial
> problems of radio (is problematic). The Commission's policy has always been to refuse
> to release the financial statements of individual radio stations...and by doing so,
> preventing any meaningful analysis of radio finances (CRTC 1997: v2, 34).

Chater added, "Given the fact the Commission continues to restrict access to individual station

figures, the total reality is difficult to see, but much evidence points to a very different picture of

radio finances that that constantly trumpeted by the CAB" (CRTC 1997: v2, 38).

CIRPA was the only actor to challenge the CAB's claims that the radio industry was in a

financial crisis and that the CRTC had to act in a manner that would allow radio to return to

profitability. Even then, CIRPA's challenges were limited to a critique of the CRTC's failure to

make financial information about private broadcasters public. No actor at the hearing directly

challenged the CAB's dooms-day financial forecast or its claim that the CRTC had to ensure

industry profitability, despite the fact that such challenges do exist in academic literature[21].

Signaling a relationship of trust between the CRTC and the CAB, the CRTC accepted the CAB's

financial claims at the hearings without question. Given that industry has been known to lie in

pursuit of its own profit motives[22], the CRTC should not simply take industry at its word. The

lack of financial information available to the public concerning the finances of some private

broadcasters is alarming. Certainly, the CRTC's ability to perform its function as an industry

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[21] See for example Audley's "Cultural Industries Policy: Objectives, Formulation and Evaluation" in Canadian
Journal of Communication 19.3/4 (1994): 317-52.

regulator is compromised without access to reliable and diverse interpretations of information. Without access to financial records, non-industry actors are structurally prevented from providing an economic analysis and from offering this analysis to the CRTC. Furthermore, as a regulator accountable to the public, the CRTC cannot be effective without a transparent engagement with the information it uses to set policy and create regulation.

Many, including Audley (1994) and McChesney (2000) suggest that the issue is not, as industry claims, the financial viability or survival of commercial broadcasting, but rather its desire for unlimited economic growth. Even if the industry's claim that survival of commercial broadcasting is in danger, the CRTC, as mandated by the *Broadcasting Act* is to ensure the public interest is served – not the financial viability of the industry. That said, many would be quick to argue that the public interest would be undermined if the industry was no longer financially viable. If one accepts that argument, the hearings, as examined in this paper, reveal that the CRTC privileges concerns of industry viability, and perhaps more accurately the profitability, over public interest.

How is the CAB able to make financially based arguments and have those arguments go unchallenged? As discussed earlier, policy network theory helps identify the close, often co-dependent, relationship between industry and the CRTC. This relationship prevents the CRTC from challenging the CAB. Relatedly, the minimal profile and influence of non-industry actors, the lack of a relationship between the CRTC and non-industry actors and the small number of non-industry actors also contribute to the ease with which the CAB is able to make arguments that go unchallenged. Finally, as critical political economy theory alerts, the current neoliberal

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[22] As in the case of Enron, for example.

context that privileges profit over public interest and where regulation is seen as counterproductive also contributes to the strength as well as the perceived legitimacy and perceived veracity of CAB's claims.

How is it that CIRPA is the only voice that attempts to challenge the claims of the CAB? From a critical political economy perspective, one could explain the lack of progressive voices in the policy process as a result of a neoliberal context that makes it difficult to articulate and have taken seriously calls for greater regulation and greater protection of public goods. Making such arguments is difficult because one of the key components of neoliberalism is a celebration of the free market characterized by minimal amounts of regulation. From a policy networks approach, one could point to minimal resources available to non-industry groups to conduct research or to prepare presentations in the policy process. One may also point to the low priority that the left places on issues of broadcasting or on policy intervention as a tactic in defending and fostering public interest media.

The CAB's claims go largely unchallenged not only by non-industry actors, but also by the CRTC. The CRTC should not be a neutral collector of information or points of view, and certainly not a biased body that privileges, without cause, industry interests and claims over non-industry ones. Rather, the *Broadcasting Act* would better serve the public interest if the CRTC acted as an interrogator of submissions against the criteria setout[23].

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[23] It is important to note that the Broadcasting Act itself however has also been disproportionately shaped by industry (Raboy 1995). Thus, if our concern is to ensure that the media work in the public interest, then a review of not only the role of the CTRC but the Broadcasting Act as well would be in order.

ii) Local Programming

Historically, radio, especially in light of other mass media and given the limitation of radio frequencies, was characterized by local production and content (Pease & Dennis 1997). The prospect of liberalized ownership potentially undermines radio's historical commitment to local programming. For example, if one company owns multiple stations, the trend is to syndicate programming across their stations instead of producing content at each individual station.

Many public interest advocates as well as the CRTC agree that locally-based radio content is important. For public interest advocates, locally produced content has a host of sociocultural benefits, such as enabling communities to see themselves, their cultures and their experiences reflected in the media. The government also relies on radio to be able to notify local communities about pressing issues, such as political crises and severe weather warnings. Regardless, McLeod of the CAB, dismissed non-industry concerns about the loss of local programming in a deregulated market. McLeod reassured the CRTC that ownership liberalization would not jeopardize radio's local programming. He said, "I don't think there is any need for the Commission to worry about radio losing its local focus (CRTC 1997: v1, 124) but provided no rationale or evidence for this claim.

There is cause to worry, however, as was unintentionally demonstrated by evidence provided in the hearings. For example, several industry actors directly contradicted the CAB by admitting that syndication would indeed occur in the future, especially in the cases of ownership consolidation or joint ventures. Slaight, of Standard Radio, unequivocally said "...[O]wnership

liberalization will lead to nationally syndicated programming" (CRTC 1997: v2, 109). Other

industry actors further confirmed the erosion of locally based radio programming as well. For

instance, Viner, from the Rogers delegation, simply said, "[W]e are in the program syndication

business" (CRTC 1997: v2, 2).

The CAB's position claims that deregulation will not affect radio's historical commitment to

local programming. Public interest advocates disagree with this claim as, notably, do some of

CAB's own members. The CAB's willingness to make such grossly contested claims reveals

structural inequalities of the hearings. For example, CAB is able to take advantage of the fact

that the CRTC does not do its own research. They are also able to take advantage of non-industry

actor's lack of resources and limited ability to do their own research. Further, CAB has an

advantage over non-industry actors because non-industry actors are not able to monitor the

hearings more closely in order to directly challenge industry claims. Thus, the structural

inequalities result in the prevailing of the CAB's analysis of the impact deregulation on local

programming, despite the highly contested nature of their analysis. Put simply, the fact that CAB

has more money and more resources afford it a louder and more influential voice with the CRTC

than non-industry actors have.

iii) Protection for Small Radio Owners and Operators

Policy actors presented numerous perspectives on whether distinct ownership rules should be

made for the protection of small operators (companies that own one or a small number of radio

stations), small-market operators (operators who broadcast in rural or remote areas), or radio-

only operators (companies that have not converged with other media such television or print). The issue of whether particular radio owners should be protected or privileged in legislation revealed one of the key areas of conflict between the various industry groups. Indeed, the stakes of ownership liberalization varied depending on the company and on whether they are most likely to become a buyer or a seller in a market that allows consolidation.

Most industry actors expressed support for ownership liberalization. However, their support was contingent upon *their* success within a liberalized market. Perhaps not surprisingly, no actor wanted to be the 'loser' of ownership liberalization – no actor wanted to be the operator to get bought out and disappear.

McCord, a member of the CAB delegation, who was actively involved with radio consolidation in the United States, confirmed that consolidation would mean change in the industry (CRTC 1997:v1, 69). But he also reassured the CRTC that there would be no losers, that those who got bought out as a result of ownership liberalization, would choose to sell. Durham and Rawlco Radio however, disagreed. Durham and Rawlco were the two industry actors who expressed concern and opposition to ownership liberalization. They asserted that they would not want to sell. Rawlinson, of Rawlco Communications, said, "...[T]he values of radio stations will go up. As a radio station owner, I have to say that is great, except that it is kind of irrelevant to us, because we do not want to sell" (CRTC 1997:v1, 163).

In fact, no industry actor expressed a willingness to sell at the hearings. But of course, in order to create companies with larger radio holdings, which are the desired result of ownership

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liberalization, some radio stations will inevitably be consumed by others. Despite broad reassurances by the CAB that everyone can be a winner in the ownership liberalization game, McCabe contradicted the CAB when he said, "[W]ell, let's not kid ourselves. One of the objectives of this is to create larger companies..." (CRTC 1997: v1, 73).

CAB's claims that consolidation can occur without losers is contradicted not only by some of its own members, but by the nature of capitalism. As McChesney observes, "[T]he simple truth is that for those atop our economy success is based in large part on *eliminating* competition.... The less competition a firm has, the less risk it faces and the more profitable it tends to be" (1999:138).

Policy networks enable a close examination of the policy process that in turn can reveal disagreements between actors who may be more broadly assumed to be homogeneous, such as industry actors. Policy network approaches also bring to our attention the potential opportunity for progressives concerned about greater regulation to use disagreements between industry actors to an advantage. For example, non-industry actors concerned about the need for greater industry regulation may strategically ally themselves with the industry actors who also favour increased regulation, such as Rawlco and Durham.

iv) The Media Consolidation Trend

According to some pro-industry analysts, consolidation allows companies to sell larger and/or niche audiences to advertisers. Consolidation enables increased advertising revenues that might

otherwise go to other consolidated media, such as television. At issue in the hearings for most industry actors was whether consolidation was necessary to enable private radio to survive in the face of other consolidating media.

McCabe, of the CAB delegation, argued that given the trend towards consolidation in other media industries, such as newspapers and television, radio also needed to be allowed to consolidate in order to compete for audiences and advertising revenues with other media industries (CRTC 1997:v1, 46). Green, of Blackburn Radio, echoed McCabe's arguments. She also claimed that ownership liberalization would level the playing field in an already largely consolidated media industry (CRTC 1997 v1, 206).

The CRTC prioritizes, as one of its central duties, the protection of the financial viability of private broadcasters (despite the fact that is not mandated to do so by the *Broadcasting Act*). Therefore, when industry claims that because other sectors of the media industry have consolidated they must also in order to remain competitive, the CRTC takes it seriously. This harkens back to the general neoliberal context in which consolidation is rampant and in which the financial viability of the private sector is often deemed to be in the public interest - a point that many progressives contest.

There are numerous reasons the CRTC takes the financial viability of the private radio sector so seriously. From a policy networks perspective, for example, one reason is the close relationship that the CAB has been able to establish with the CRTC. From a political economy perspective, such as that provided by Audley (1994) for example, structural tension within Canadian

broadcasting policy explains why broadcasting policy prioritizes the financial motivations of private industry. Audley argues that broadcasting policy in Canada, while it has had cultural and social goals, has been debated and decided on the context of market forces, forces which work against cultural and social development (1994:318).

v) US Radio Concentration as a Model for Canada

At the hearings, the CAB authoritatively advocated that the US model of ownership liberalization be followed by the CRTC in Canada in order to allow private radio to increase its profitability (CRTC 1997: v1, 72). Two experts were brought in by the CAB to attest to the desirability of duplicating the US model. For example, McCord, one of these experts, sung praises of the US model of radio consolidation. Speaking to his own experience as a radio operator who increased his holdings as a result of ownership liberalization, McCord said, "radio revenues have grown at a compounded rate of 10% per year" (CRTC 1997:v1, 67).

Dangled like a carrot in front of the CRTC, the promise of profits seen in the US example was mostly a result of cost cutting. McCord made little attempt to hide this. He explained that where previously each station had a general manager, a business manager, a receptionist and an engineer, after consolidation, these positions were "duplicated" and one of each staff-position was cancelled and staff fired (CRTC 1997: v1, 68). Unfortunately, the impact of firing workers, such as the ability of stations to produce local content, was unchallenged at the hearings.

However, Kirk of Durham Radio, did contest the CAB's use of the US model as an example for

Canada on the basis of a concern for smaller radio operators and owners. Kirk argued that

Canada already had higher levels of concentration than in the US. Further, he argued that

increased ownership liberalization would only worsen the situation and that small operators and

owners would suffer while the big companies would benefit. Compared to the US where the top

ten companies owned 11% of the total radio stations, Kirk argued that in Canada, "...the top ten

groups...companies like CHUM, Rogers, WIC, Standard, Shaw, et cetera, own....53% of the

total stations in the top 50 markets...If one backs up and just looks at the top ten markets...those

ten owners own 68 of 102 stations, or 68% of the stations in the top ten markets" (CRTC 1997:

v2, 7).

Chater, from CIRPA, also expressed concern over the existing level of ownership concentration

in Canada. He said:

> ...we consider that a level of concentration in general in Canada is already very high,
> especially in major markets. The reality is there are practically no independents...in most
> major markets there are very few independent stations left. In Ottawa there is one...I
> mean the chains, the seven or eight chains, own most of the stations in the major markets
> in Canada (CRTC 1997: v2, 128-131).

vi) Contested Definitions of Diversity

Policy actors expressed differing notions of what constitutes diversity. For instance,

Duff Roman, a member of the CAB delegation, insisted diversity means diverse formats in radio

programming (CRTC 1997 v1, 70). He pointed to how radio stations in Windsor have made

agreements with each other to ensure program diversity, that is, they have agreed which station

will play modern, adult alternative album, all-talk, or nostalgia (CRTC 1997:v1, 70). This was reiterated throughout the hearings. For example, CAB explained that ownership liberalization will mean an "increase in format diversity" (CRTC 1997: v1,21).

However, not all industry actors were in agreement. Kirk, from Durham Radio, argued that ownership liberalization would lead to large concentrations of few companies in the industry and as a result, these companies would take few risks in the content or format of programming, thus, resulting in less diversity of programming content and format (CRTC 1997: v2, 9).

While public interest groups such as Media Democracy Day or Campaign for Press and Broadcasting Freedom[24] were not present at the hearings, and non-industry actors failed to make the point, diversity is also about a commitment to broad range of groups, communities and views have access to broadcasting media. Equity and other social goals are pivotal a meaningful definition of diverse broadcasting.

In this point of conflict one of the ways in which power is exercised is by taking advantage of the marginalization of minority communities and views. More specifically, advantage is taken of the fact that addressing marginalization is a not a public priority and in fact, often efforts to diminish marginalization are attacked as extreme and a threat to white Anglo-Saxon Canada (Razack 1998). More broadly it is about how concepts like diversity in broadcasting come to be defined. The CRTC for example appears to view representational diversity as the role of public and

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[24] Information on both of these groups can be viewed at www.presscampaign.org and www.mediademoncracyday.org. Last accessed March 2004.

community broadcasters to fulfill, essentially enabling private radio (despite the fact that private radio dominates the radio spectrum) to evade this issue.

vii) The Inextricable Link between Content and Ownership

Throughout the hearings, the CAB and other industry actors claimed that content would not be affected by changes in ownership rules. They argued, as has been discussed, that concerns over the local nature of programming or of diversity were unfounded. However, they also claimed that private radio stations were concerned with attracting large numbers and specific niches of listeners in order to be able to attract advertisers to their stations. These arguments essentially frame listeners as a commodity that is sold to advertisers by private media.

Progressives on the other hand, argue that the question of who owns the media has a direct impact on the content that is produced, and that furthermore, the content produced by private media is severely limited by the audience-as-commodity dynamic. Stevenson, from the NCRA, for example, expressed these concerns at the hearings. He argued that the CAB's proposal for ownership liberalization was "hypocritical" because while it claimed that ownership liberalization would have no impact on programming, the CAB also sought to simultaneously to have the CRTC to remove what little protection for English and French-language programming existed (CRTC 1997: v2, 42).

This conflict provides a good example of the ways in which the prevailing neoliberal hegemony is a significant social force. In this case the neoliberal hegemony gives significant weight and

legitimacy to ideas that promote commodification and deregulation[25]. At the same time this hegemony makes it more difficult for counter-hegemonic ideas to be taken seriously.

vii) Corporate Evasion of CRTC Policy

Another significant point of conflict revolved around Local Management Agreements (LMA) and joint ventures. LMAs enable two different commercial radio stations to essentially act as if they have the same owner. That is, that the two owners, instead of competing with each other, enter into agreements that enables each of them to "own" a particular piece of the market.

According to Green of Blackburn radio, Blackburn participates in LMAs because "stations seek to carve out distinct…niches, rather than cannibalizing revenues by targeting the same audience with similar programming" (CRTC 1997 v1, 207). However, Kirk, of Durham Radio, notes that the CRTC should "eliminate LMAs from going forward" because they are "just a first stage condition to multiple station ownership" (CRTC 1997: v2, 9).

What was made clear in the hearings is that LMAs are entrenched in the industry. Industry actors were able to exercise power based on the weakness of the CRTC. Essentially, industry is setting the rules even before public hearings begin, as the example of LMAs demonstrates. While theoretically, the CRTC has the power to make decisions on issues such as ownership that would impact LMAs, the CRTC made no move towards challenging LMAs which are an explicit undermining of the CRTC's own regulation rules (which at the time of the hearings did not

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[25] Neoliberalism promotes more extreme versions of commodification and deregulation than, for instance, Keynesian paradigms.

permit unregulated ownership consolidation). The CRTC was limited by its own weakness, which has been discussed throughout this paper. Certainly part of this weakness can be attributed to the fact that the CRTC has always operated within a capitalist framework that has respected the role of markets within a changing regulatory framework. The commitment to the public interest mandate has diminished as neoliberal hegemony has intensified.

viii) Contested Definitions of 'Public'

As was discussed earlier in this paper one of the central roles of the media is to function as a public good that promotes democracy. Such a notion of democracy insists that the audience is comprised of citizens. However, at the CRTC hearings, significant conflict emerged regarding definitions of audience.

On the one hand, the CAB presented views that indirectly frame audiences as commodities to be sold to advertisers. As CAB put it, "the core of our proposal is to strengthen radio so that it can compete effectively for listeners and for advertisers" (CRTC 1997: v1, 23). This view was justified by Claude Beaudoin, a representative of CAB, who argued that radio is rating-driven, and that therefore, to improve revenue, radio companies need to improve their market share (CRTC 1997:v1, 48). Essentially, under this paradigm audiences are sold to advertisers.

On the other hand is a position presented by NCRA. NCRA views audiences as citizens to be informed and engaged for the purpose of promoting healthy and dynamic communities.

Stevenson stated, "[W]e are profoundly uncomfortable with the notion that we are regarded simply as a market which can be delivered to advertisers..." (CRTC 1997: v2, 41).

Again, as has been seen elsewhere, the overwhelming emphasis on the pursuit of profit as the justification for change is what makes it possible for CAB to make the assertion that audiences are commodities to be sold to advertisers. That CAB can make such an assertion and elsewhere in the hearings make claims that they are serving a public interest speaks to the degree in which the CRTC hearings and the CRTC itself have been co-opted into a market-centred model of broadcasting.

e) How Power was Exercised in the CRTC Hearings

Industry actors primarily exercised power in four related ways. First of all, they articulated their arguments in a manner that took advantage of a policy environment that is increasingly friendly to neoliberal approaches to deregulation and commodification. Industry actors relied on the acceptance of ideas that the freer the market and the lesser the regulation the better. Indeed, hegemonic ideology has a tendency to confine public and political imagination. What is deemed possible is largely framed by the existing hegemony. Secondly, industry actors exercise power by taking advantage of their close relationship with the CRTC. Industry actors could rely on the CRTC, an agency of the neoliberal federal Canadian state, as an ally. The CRTC saw its interests and the public interests as consistent with industry's interests. Thirdly, the tremendous financial resources and organizational capacity of industry actors, enabled them to exert power by providing experts, research and an overwhelming presence at the hearings. Lastly, the

reputational capital of many industry actors gives further legitimacy and weight to their submissions. Of course this reputational capital has been developed because of the things industry actors are able to do and gain access to because of their financial resources.

As for the non-industry actors, they sought to shift power dynamics by pointing out the contradictions and inadequacies of neoliberal deregulation. Specifically, they attempted to reveal the contradictions between seeking profit and acting in the public interest. They attempted to exercise a degree of power and at the same time diminish the power of industry by claiming the moral high ground, that is, claiming to speak on behalf of democracy and public interest. Further, non-industry actors attempted to disrupt the prevailing power dynamics by revealing the failure of the CRTC to fulfill its mandate to act in the public interest. They attempted to highlight the ways in which the CRTC was colluding with and acting on behalf of industry. Finally, and not unrelated to their criticisms of the CRTC, non-industry actors claimed legitimacy by speaking on behalf of audiences, rather than shareholders.

Given this review of the hearings and the analysis of how power was exercised, attention needs to given to the question about what opportunities, if any, exist for progressive policy intervention. While many progressives refute the relevance of policy intervention because they claim the state's power has been too severely diminished in favour of corporate power, others point to the fact that corporate and private interest power is facilitated by agreements, legislation and regulation that is authored and enforced by states. Thus, even in a neoliberal context, policy does hold potential to contain and even control corporate power, as exemplified by the legislation as diverse as the *Kyoto Protocol* and the City of Toronto's ban on pesticide use.

Because of this potential of policy and because power is dynamic and constantly shifting, it is incumbent on progressives to seek to have an impact in policy arenas.

The review of the CRTC hearings revealed a number of potential opportunities for progressives to have an affect on broadcasting policy. Firstly, impact could have been greater if more resources had been committed to research. By relying more on sympathetic academics and left-wing think tanks such as the Canadian Centre for Policy Alternatives and the Canadian Council for Social Development , progressive forces could offer more potent research and more forceful arguments. Secondly, if progressive forces prioritized building a stronger relationship with the CRTC, their attempts at policy intervention may have had more success. While such relationship building is difficult and it is unlikely that non-industry, progressives are going to have the kind of close relationship that industry actors have with the CRTC, a more familiar relationship would make it more difficult for the CRTC to marginalize and minimize the role of progressives. Thirdly, if progressive forces built their profile so as to have more clout in the policy process and with the public, their impact would likely be greater. Fourthly, non-industry actors could have a stronger voice in the policy process by forming coalitions. For example, there are a large number of public interest groups that could intervened at the hearings, but did not for a variety of reasons including a lack of resources and policy experience. Working in coalition, more seasoned policy advocates such as Friends of Canadian Broadcasting could have facilitated greater involvement of progressive forces. Of course none of these measures is easy for progressive non-industry actors to take. However, they hold potential.

f) Outcomes of the CRTC Hearings

Under the new 1998 CRTC rules, radio station ownership was liberalized to allow one owner to control more stations than previously permitted. The new policy states:

> In markets with eight commercial radio stations or more operating in a given language, a person may be permitted to own or control as many as two AM and two FM stations in that language. In markets with less than eight commercial stations operating in a given language, a person may be permitted to own or control as many as three stations operating in that language, with a maximum of two stations in any one frequency band (CRTC Public Notice 1998-41).

The change in ownership rules, referred to as the "2+2 formula", was a two-fold increase in most markets from the previously allowed one AM and one FM station. There was virtually no recognition of any of the concerns articulated by non-industry actors. Perhaps most tellingly, the outcomes of the CRTC radio hearings took no steps to try to improve the potential for radio broadcasting to contribute to Canadian democracy and other public interests, which of course is what they are mandated to do in the *Broadcasting Act*.

The CRTC public notice following the hearings, states that ownership rules were liberalized in order to allow "existing radio station owners to improve their present financial situation, attract new investment and compete more effectively with other media" (CRTC Public Notice 1998-41). What this justification for a policy change in ownership rules reveals is a pro-industry attitude at the CRTC. Furthermore, it demonstrates that the CRTC is not adequately ensuring the enforcement of the *Broadcasting Act*. Section 3 of the *Act* expresses a commitment to broadcasting functions in the public interest (*Broadcasting Act* 1991 Section 3).

Conclusion

Using critical political economy and policy network theory as a lens to investigate policy intervention, it has been revealed that important opportunities do exist for progressives to participate in the policy process in order to defend and foster public interest media. That said, these opportunities are not easy to seize, nor are they sufficient on their own. While there is opportunity for progressives to gain more voice in the hearing process, the impact of greater voice must not be overemphasized. Rather, progressive policy intervention should be seen as an important tool to challenge neoliberal hegemony and build counter-hegemony. As a tactic on its own, policy intervention is unlikely to produce the results of progressives are seeking. Policy intervention may have the advantage, for instance, of slowing the drive towards liberalization and reinforcing various progressive tendencies within the CRTC mandate.

Critical to defending public interest media is i) building public awareness of and support for public interest media ii) revealing the negative and undemocratic impacts of corporate media iii) challenging the claims of corporate media and iv) exerting political pressure on the CRTC to fulfill its mandate. Thus, policy intervention, as one of many tactics can help accomplish these objectives by inserting a progressive voice and perspective in the very decision making process that largely determines the media landscape in Canada. While the left's frustrations with the policy arena are understandable, it remains a potentially fertile mechanism in which to defend and foster public interest media.

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