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Navigating Producer-Consumer Convergence: Media Policy Priorities in the Era of User-Generated and User-Distributed Content

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NAVIGATING PRODUCER-CONSUMER CONVERGENCE: MEDIA POLICY PRIORITIES IN THE ERA OF USER-GENERATED AND USER-DISTRIBUTED CONTENT

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Introduction

Perhaps the greatest challenge confronting media policymakers and policy researchers is effectively adjusting their analytical frameworks to account for the dramatic changes taking place in the contemporary media environment. Converging media technologies, the globalization of distribution networks, and unprecedented fragmentation and interactivity, are just some of the ways in which the media environment is dramatically changing – in ways that bear directly on a wide range of media policy issues. We saw this quite vividly in the U.S., for instance, in the Federal Communications Commission's (FCC) media ownership proceedings, in which decision-makers and researchers grappled with questions related to if and how the Internet should be incorporated into assessments of the competitive conditions and diversity of local media markets (see, e.g., Napoli & Gillis, 2006). Today, with the emergence of what is commonly referred to as Web 2.0 (Mabillot, 2007), many of us in the media policy field are confronting further changes in the media environment that have the potential to dramatically affect established theories, analytical approaches, and policy priorities (Benkler, 2006).

Of particular importance is the rise of user generated content and the associated uncertainty about what it means (in terms of both challenges and opportunities) for media policymaking and policy analysis. The term user generated content has become the primary label applied to a wide range of activities engaged in by media users, ranging from blog writing, to participation in social networking sites, to uploading videos, photos, and music to file-sharing sites and services. Formally speaking, user generated content has been defined according to the following three criteria: a) content made publicly available over the Internet; b) content that reflects a certain amount of creative effort; and c) content which is created outside of traditional professional routines and practices (Wunsch-Vincent & Vickery, 2007). These activities, of

course, represent the ongoing convergence that is taking place between media producers/distributors and media consumers (Jenkins, 2006) – a blurring of the traditional boundaries separating media organizations and their audiences that is being driven by a media environment in which interactivity is the norm rather than the exception, and in which the Internet provides a distribution platform in which barriers to entry are unprecedentedly low and in which distribution is inherently global.

This article considers the media policy implications of this ongoing convergence of media producers and consumers. The migration of production and (more recently and more importantly) distribution capacity to individual media users, combined with the demonstrated willingness of audiences to consume such user generated and user distributed content (see Napoli, forthcoming), call into question fundamental assumptions underlying many aspects of media policy about the relationship between media organizations and their audiences. Specifically, traditional media policymaking has been premised largely on the assumption that access to the media was inherently limited and exclusive, and therefore the speech rights of a relatively limited number of stakeholders needed to be taken into consideration. In addition, media policy traditionally has been premised, to some extent, on the notion that media organizations were inherently better equipped to produce the kind of information essential to a well-functioning democracy than were the individuals that these media organizations served.

This article re-evaluates both of these assumptions, and in so doing puts forth two arguments. The first argument is that a fundamental guiding principle for contemporary media policymaking and policy advocacy in this transformed media environment should be *access to audiences.* That is, as the barriers impeding access to the media drop, or, more precisely, as access to traditional media organizations/outlets becomes less central to the process of mass

communication (yes, that term is still relevant), it is important for policymakers to consider those structural, technological, or institutional barriers that can contribute to disproportionate levels of access to audiences amongst speakers. The second argument is that, somewhat paradoxically, in this environment in which the barriers to entry to the production and distribution of media content have been dramatically lowered, policymakers now face a stronger imperative to develop policy tools for preserving traditional media institutions – particularly the institution of journalism. These two arguments are intended to illustrate the two somewhat contradictory sides of the increasingly vexing media policymaking coin, in which the technological capacity to empower communication across the citizenry must be protected and promoted via policy interventions, and in which the damage to traditional media institutions that is, to some extent, the byproduct of such wider-ranging communicative power must be addressed by policy interventions as well.

In addressing these issues, the first section of this article offers a brief discussion of user generated content within the context of the broader technological and economic changes affecting the media environment. The second section discusses how the notion of a right of access to audiences emerges as a fundamental media policy principle in this reconfigured media environment. The third section turns to the argument that the preservation of traditional media institutions needs to be a fundamental goal of media policymaking in this reconfigured media environment. The concluding section summarizes the key points and implications of this article.

<div align="center">User Generated Content and Producer-Consumer Convergence</div>

It is important to recognize that while the terminology *user generated content* is relatively new, the notion of user generated content is not new at all. Various forms of user generated content have existed throughout the history of our media system – even during the era

dominated by true *mass media,* which we are now exiting. The literature on the history of audiences frequently has demonstrated how early manifestations of the audience were very much participatory and interactive (Billings, 1986; Butsch, 2008; Napoli, in press). Theater audiences, for example, engaged in a wide array of activities, ranging from singing songs, to yelling instructions and insults at the performers, to yelling at (and fighting with) each other (Billings, 1986; Butsch, 2008). It was only with the development of electronic mass media such as motion pictures and radio (and later, television) that the dynamic between content provider and audience became increasingly uni-directional and the audience's role as a contributor of content in some form or another diminished. However, even in the early, developmental periods of some of these mass media, the remnants of a more engaged and participatory audience persisted (see Newman, 2004). Ross (1999), for instance, chronicles the "worker film movement" in the early years of the 20th century, in which members of various workers' organizations, frustrated with the anti-labor messages they perceived in motion pictures, set about creating and distributing their own self-produced films. In the early days of the radio industry, audiences (primarily via fan mail) played an integral role in the creation of radio programs, as producers and writers frequently incorporated suggestions received from audience members into their scripts (Razlogova, 1995).

However, the more familiar one-to-many, top-down audience-content provider dynamic within these media quickly became institutionalized (Butsch, 2000; Razlogova, 1995).[1] And, interestingly, this dynamic spread to the older audience contexts that previously had been more participatory in nature (Butsch, 2008). For instance, yelling and throwing objects at theater performers and fellow theater-goers has largely gone out of style. One could argue that the mass media contributed to a pacification of audiences, with this tendency toward passivity becoming

almost a defining element of the idea of the audience (see Butsch, 2008). As Angus (1994) argues, the tendency of the most significant contemporary communications systems has been to produce audiences without the capacity to produce and circulate social knowledge (p. 233).

Now, via contemporary developments in the realm of media technologies, this more uni-directional approach to the relationship between media and audiences that took hold during the growth of traditional mass media through the 20th century is being undone. According to Cover (2006), new media technologies "effectively restore to the audience their capacity to participate" (p. 150). In this way, some aspects of the ongoing process of *audience evolution* (Napoli, in press) being described here can be seen as somewhat cyclical.[2]

What is different today, of course, is that media audiences now have, thanks largely to the Internet, the access to potential audiences that was largely missing in previous generations. Indeed, one surprising characteristic of many user generated content discussions is that the focus is often misguidedly on the revolutionary or disruptive aspects of user's ability to *produce* content.[3] Even the term, user *generated* content, reflects this misplaced emphasis. This is not the aspect of contemporary developments that is new or of the greatest significance (Mabillot, 2007). Users' capacity to generate content has been around for quite some time, due to the long-established availability of production technologies such as home video cameras, personal computers, typewriters, and home recording equipment. What is different today is the ability of users to *distribute* content, to use the Web to circulate their user generated content (as well as, to media companies' dismay, traditional media content) to an unprecedented extent.[4]

The result of this ongoing transformation, as Benkler (2006) and others have demonstrated, is a media environment in which the tools of participation in public discourse and creative activity are much more widely distributed (Beer and Burrows, 2007; Jenkins, 2006;

Mabillot, 2007); in which content provider and audience essentially converge (see, e.g., Cover, 2006; Jenkins, 2006; Stewart & Pavlou, 2002; Svoen, 2007). We are, however, still in the relatively early stages of understanding the media policy priorities that should be highlighted by these reconfigured dynamics (see, e.g., Benkler, 2006; Zittrain, 2008). The sections that follow offer some suggestions.

From Access to the Media to Access to Audiences

At the general level, the new media environment is one in which many of the separations and privileges associated with the traditional organization-based communicator that long have been embedded in our regulatory structure need to be reconsidered. This is particularly the case in terms of the issue of access – which has been a long-standing tenet of media policy (see Napoli, 2002). Traditionally, the organization-based communicator was separated from the audience largely by the level of access to the means of communication. Television stations, radio stations, cable networks, cable systems and the like all represented media to which only a limited few had access. Such inequality was seen as an inevitable byproduct of the economic and technical characteristics of these media, not as free speech or public policy issues in need of remedy. Efforts to carve out a more egalitarian right of access to the media (see Barron, 1967) gained some limited, and largely temporary, traction (Napoli & Sybblis, 2007). The rise and fall of the Fairness Doctrine in the U.S. represents a useful case in point (see, e.g., Campbell, 2008), as does the imposition of public access requirements for cable systems.

However, it may very well have been the case then, and it is increasingly the case now, that the focus of media policymakers and researchers should not be on the issue of access *to the media,* but on the issue of access *to audiences* (see Napoli & Sybblis, 2007). What is the difference? The difference is that the notion of access to the media essentially stops with access

to the means of producing and distributing a message. Access to audiences picks up where access to the media leaves off by encompassing the *extent* of the speaker's capacity to distribute a message, and how the capacities to do so are distributed across speakers. Thus, access to audiences goes beyond the speaker's right to express herself; it also encompasses, to a greater extent than the right of access to the media, her right to be heard (see Napoli & Sybblis, 2007).

Two speakers with access to the media can vary tremendously in their level of access to audiences. A broadcast licensee in New York City traditionally has had much greater access to audiences than a licensee in Omaha, Nebraska. A cable network available in 80 million homes traditionally has had much greater access to audiences than a cable network available in 10 million homes. A musician signed with a major record label traditionally has had much greater access to audiences than a musician signed to an independent label.

Clearly, there always have been different levels of access to audiences, even among those with access to the media. These differences generally seldom have been thought of as violations of anyone's speech rights, or as policy problems requiring attention. However, it has been argued that the First Amendment right of access to audiences is denied "if selection intermediaries block or discriminate against a speaker on grounds that listeners would not have selected" (Chandler, 2007, p. 1095). From this standpoint, the contemporary media environment – and contemporary media policies – need to be assessed in light of the extent to which such behaviors are taking place.

An emphasis in the legal and policymaking sectors on the right of access to audiences seems particularly appropriate in light of the much longer and more robust free speech tradition protecting speakers' rights of access to audiences than there is protecting speakers' rights of access to the media (Napoli & Sybblis, 2007). The U.S. courts have, for instance, upheld

speakers' rights to canvas door-to-door, to approach and offer information and ideas to citizens in public places, and to wield signs and banners, all in the name of protecting the basic First Amendment right that a speaker has to access audiences (Napoli & Sybblis, 2007). In all of these instances, the key question involves whether speakers' access to audiences is being protected and promoted to the extent guaranteed by the First Amendment. On the other hand, the notion of a First Amendment right of access to the media has remained very much on the fringe of First Amendment theory (Napoli & Sybblis, 2007).

Media policymakers only occasionally have emphasized access to audiences in their analyses (Napoli & Sybblis, 2007), probably because, in our now-concluding era of true mass media, it was much easier to assume a reasonable degree of equivalence between access to the media and access to audiences. However, in an environment of fragmentation, long tail distributions of audience attention (see Anderson, 2006), and the growing prominence of user generated content, the need for policymakers to recognize, and potentially act upon, the disconnects between access to the media and access to audiences is becoming more pronounced. Now, imbalances in speakers' access to audiences may be much less a function of the unavoidable technical or economic characteristics of the media.

Today, thanks largely to the Internet, an exponentially larger proportion of the population has access to perhaps the most significant medium of communication, and in that regard stands on closer to equal footing with the traditional organization-based communicators in terms of their access to the media. In this regard, the traditional access to the media disparity has been *dramatically improved* (Barron, 2007). Now, for this new media environment to reach its full potential in terms of its ability to achieve greater equality in the allocation of speech rights, we need to focus attention on the issues that arise after access to the media has been achieved. That

is, what are the impediments to greater equality in access to audiences? Do any of these impediments involve inappropriate institutional restrictions on speakers' rights of access to audiences? Since audiences are now themselves producers and distributors of content, these questions reflect particularly pressing concerns, since they now directly affect so much more of the population.

These concerns reflect the fact that the issue of access to audiences is largely an issue of distribution. As was noted above, it continues to be the case that in user generated content discussions, the focus is often misguidedly on the user's ability to *produce,* rather than *distribute,* content. A policy focus on the right of access to audiences focuses attention on whether the producers and distributors of user generated content are able to operate on equal footing and on identifying impediments to equality in the opportunities to take advantage of the tremendous distribution capacity of the Internet.

While it is certainly the case that the new media environment offers a more egalitarian level of access to audiences than was the case in years past, it is important to emphasize that our media system should never be assessed primarily in terms of its performance relative to points in the past. Rather, it should be assessed in terms of the extent to which it is reaching its current potential. Today, technology has given us the potential, within certain communications platforms, to place the individual and the organization-based speaker on more equal footing. And policymakers and policy researchers should work toward ensuring that this potential is met.

Access to Audiences and Media Policy

The issue of access to audiences is central to many of today's most important media policy debates, though it has unfortunately remained at the margins of many of these debates – to the detriment of truly robust and well-rounded policy analysis and advocacy. Foregrounding the

right of access to audiences within these varied policy contexts could prove useful to policy

advocates in both the legal and policymaking arenas.

The network neutrality issue, which has become a very contentious policy issue in the

U.S. (and is beginning to emerge in other national contexts as well), is essentially an access to

audiences issue. Network neutrality refers to the notion that network service providers should be

obligated to behave "neutrally" in their routing of network traffic – this despite the fact that most

networks have the capacity to facilitate discriminatory practices by the network operator in terms

of transmission speeds and even overall levels of access. The discriminatory mechanisms that

network service providers can employ to selectively block, disrupt, or slow the flow of Web

traffic can essentially be thought of as mechanisms for creating differentiated levels of access to

audiences amongst speakers (Chandler, 2007). In this regard, the network neutrality issue is as

much about speakers' rights to reach audiences as it is about audiences' rights to receive

information, or about the rights of network operators to control the flow of traffic across their

networks.

This is an argument that a number of analyses have, to some extent, already brought to

bear on the network neutrality issue. However, in their emphasis on privileging the speech rights

of online speakers rather than those of network operators, the grounding in the specific right of

access to audiences has been more implicit than explicit (see, e.g., Herman, 2006; Travis, 2007).

Explicitly injecting the right of access to audiences into this policy debate could potentially help

to bring into sharper relief the nature of the policy challenges that remain in the wake of our

transition to an era in which access to the media is much more easily obtainable, and alter, to

some extent, the balance of First Amendment power in the arguments between those who favor

and those who oppose mandated network neutrality.

The media ownership issue is, to some extent, an access to audiences issue, as greater concentration of ownership of media outlets creates further inequalities in access to audiences across speakers. As Napoli and Sybblis (2007) argue, the historical neglect of the First Amendment right of access to audiences rationale by those who have advocated on behalf of greater diversity in the ownership of media outlets represents a missed opportunity to bolster a rhetorical strategy that has instead relied primarily on the notion of the rights of the audience to receive information, a right that has yet to be fully embraced by those with more conservative interpretive approaches to freedom speech.

Further, an access to audiences perspective foregrounds one aspect of the media ownership issue that has too often remained in the background – the extent to which audience attention is concentrated around a select few sources (see, e.g., Hindman, 2009; Webster, 2007). Media ownership policy analysis has tended to neglect the distribution of audience attention across media owners for a variety of reasons (see Napoli & Gillis, 2006). However, an approach to the issue of ownership concentration that is grounded in the notion of a right of access to audiences is one in which the distribution of audience attention across media owners is a natural point of analytical focus, as it represents an important indicator of the extent to which different media owners are accessing audiences. And if indeed there are structural impediments to the wide distribution of audience attention, then the elimination or reduction of such structural impediments can be premised upon the enhanced distribution of the First Amendment right of access to audiences. Or, for that matter, the extent to which new media technologies provide more equitable distribution of the right of access to audiences can inform if and how the structural regulations that exist within the traditional media sector should be altered (see, e.g., Hindman, 2009).

The protocols in the operation of Web search engines raise significant access to audience issues, as the placement order of Web sites in search engine listings is a key factor in determining the level of access to audiences enjoyed by different sites (see Chandler, 2007; Napoli, 2008). Some analysts have suggested that regulatory oversight of the operation of search engines is necessary, appropriate, and full defensible on First Amendment grounds, given the importance of search engines to online communication and the wide range mechanisms via which search engine operators can distort and block the results of search queries (see, e.g., Bracha & Pasquale, 2008; Helft, 2008). Yet, interestingly, these arguments have tended to focus on the First Amendment rights of search engine operators (and the limits of these rights), to the neglect of the First Amendment rights of the Web sites seeking access to audiences via search engines. Here, the incorporation of an access to audiences analytical framework could potentially strengthen arguments supporting the need for regulatory oversight of search engines, as a relevant free speech concern is being brought to the table that has, to this point, been largely neglected.

The key here is that policymakers, policy advocates, and policy researchers need to recognize and better utilize an important, though undeservedly neglected, speech right that tends to get lost amongst all of the competing normative and legal claims surrounding these new media policy issues. The internalization of this right into the predominant analytical and advocacy frameworks for these issues may lead to more effective policy advocacy and decision outcomes in both the legal and policymaking arenas that are more reflective of the full range of speech values that are at issue.

The Future of the Institution of Journalism

The previous section emphasized the ways in which the new media environment compels a reorientation in policymakers' traditional focus, particularly in terms of accounting for speakers' rights of access to audiences. This section discusses a second – and in some ways conflicting – emerging media policy priority – the development of appropriate policy responses for preserving traditional journalistic institutions. Note the use of the *institutions* terminology here, as it is meant to emphasize the level at which policymakers' attention needs to be directed. That is, policymakers should not concern themselves with preserving particular *platforms* (e.g., printed newspapers), or even, for that matter, particular media *organizations* (e.g., *The New York Times*) (see Cooper, 2009); rather, they need to concern themselves with preserving particular institutions (e.g., journalism) in the face of technological – and associated economic – changes that may threaten their continued viability. From this standpoint, the term *institutions* is being used in its most traditional sense – as a set of structured behavioral practices.

Thus, when we talk about preserving the institution of journalism, we can, *to some extent,* be agnostic about where the journalism is produced and by whom. However, we must still demand that many of the behavioral practices associated with the institution of journalism be retained. Elements of the practice of journalism such as professional training, sourcing criteria, news value judgments, investigative reporting, and a critical, watchdog stance towards other societal institutions, represent some of the (certainly, to some extent, ideal-typical) characteristics of traditional journalism that are widely presumed to be beneficial to citizens in a democracy. It is these structured behavioral practices that are in all likelihood worth preserving – potentially independently of the organizations and platforms in which they have developed and thrived.

However, *up to this point in time,* the dynamics of the new media environment have undermined the business models of most of the media industry sectors that have historically provided the baseline of support for our journalistic institutions. The business models for our news organizations have been damaged on both strategic fronts on which the economics and strategy of media industries traditionally have been based – the sale of content to audiences and the sale of audiences to advertisers.

On the content side, journalistic institutions are being confronted by the digital environment's nearly overwhelming pressure to make content available to audiences for free. In the online space, where so much content is available for free, and where organizationally produced content must compete for audience attention with the ever-growing volume of user generated content (see above) it has proven quite challenging for most journalistic organizations to charge for their content the way they traditionally have in the printed realm, thereby eliminating a key revenue stream for news outlets. As Stewart Brand famously stated, information wants to be both free and expensive (see Anderson, 2009); but in today's media environment, the forces that make information free to consumers seem to be overpowering the forces making information expensive to consumers. This pattern obviously damages one of the key revenue streams that traditionally has supported the institution of journalism.

Turning to the revenues that journalistic organizations traditionally have derived from the sale of audiences to advertisers, technological changes are again having damaging effects. The relevant changes generally fall under the broad umbrella notion of fragmentation, which involves the fragmentation of content options both within (intra-media fragmentation) and across (intra-media fragmentation) media, as well as the fragmentation of audience attention across available content options (see Napoli, in press).

In today's highly fragmented media environment, it is possible for content to become increasingly disaggregated. These forms of disaggregation of traditional media content units in many ways represent the core crisis affecting the production of media content today, as this kind of disaggregation undermines the various cross-subsidy mechanisms that long have been central to media content production. One or two hit songs subsidize the production of 12 other songs on an album. The many people who may have bought a newspaper primarily for the sports or business section subsidize the production of less popular sections (e.g., international affairs). Cable and DBS service subscribers subsidize the operation of many cable networks that they never actually watch. Disaggregation of content into more discrete consumable units undermines these subsidy mechanisms and puts heavily subsidized content in peril. Thus, for instance, costly forms of reporting such as investigative journalism are seen as increasingly in peril in a media environment in which such journalism can not be as effectively subsidized via audience interest in other forms of content (see Starr, 2009).

Content is also disaggregating from the advertisements that have traditionally been embedded within it. This is essentially the problem that has befallen the newspaper industry, where entire advertising segments such as classified advertising have completely decoupled from the daily news and migrated online in the form of free-standing classified services such as Craigslist and Monster. And, unlike with most other media, the advertisements contained within newspapers were valued by audiences. That is, newspaper readers tend to prefer more ads in their newspapers rather than less, according to analyses of the relationship between ad pages and circulation figures.[5] This helps explain why many of the types of advertisements that traditionally have been prominent in newspapers (classifieds/employment ads, automobile ads) can support stand-alone Web sites. The loss of these types of advertisements means not only

lower ad revenues for individual papers, but also circulation declines, as the newspaper becomes

a less appealing product for some readers given its diminished advertising content.

In addition, news, amongst all forms of media content, has always been particularly

vulnerable from an economic standpoint. News is a public good with substantial positive

externalities can not be fully captured within traditional marketplace transactions. Products with

such characteristics tend to be under-produced relative to their true economic value. For

instance, the economic benefits of a better-informed citizenry can not be effectively captured in

the transactions that take place between news outlets and advertisers; and so, the market

produces less news (or perhaps even lower quality news) than would be optimal for the citizenry

(Cooper, 2009).

And so, here is a product that was, in all likelihood, already being under-produced

relative to its full value, now having its existing economic support system yanked out from under

it. This situation not only undermines the production of traditional journalism, but also compels

journalistic organizations to integrate – and increasingly rely upon – various forms of user

generated content (often referred to as "participatory journalism"), such that many news

organizations today rely upon their audiences to produce content for them for free and thereby

save themselves the costs of doing so on their own (Napoli, in press). Can we confidently rely

on user generated content, in its nearly infinite variety of forms, to effectively fill the gap being

created by the apparent decline of traditional journalism? Are there new intermediate production

models or organizational forms that can fill this gap? These questions are quickly emerging as

amongst the most vital policy questions of the day.

It is important to emphasize that it remains a point of contention as to whether the new

media environment, while undeniably undermining traditional news organizations (see above),

may be simultaneously facilitating the development of effective substitutes. This is a growing

debate within the media policy sector – and one that must be addressed with a substantial

infusion of rigorous research. Up to this point, this debate has been fueled largely by dueling

anecdotes. Many observers contend that the damage that the new media environment is

inflicting on our traditional journalistic organizations is being more than offset by the alternative

information sources and reporting models that are emerging in the online realm. Advocates of

this perspective point to developments such as the rise of non-commercial journalistic models,

the growth of various forms of *crowd-sourced* news and information generation, and the greater

diversity of available information sources, as just some of the benefits of the news environment

in a Web 2.0 world that make it superior to the news environment of the mass media era (see,

e.g., Benkler, 2006)

The underlying (and certainly arguable) assumption of this article, however, is that there

are, in all likelihood, *some ways* in which the journalism produced by many traditional media

organizations is inherently superior than the various forms of user generated content in terms of

serving certain informational needs of a citizenry in a democracy. This is not to say that there

are not also *some ways* in which user generated content can be superior to content produced by

traditional media organizations in terms of serving the informational needs of the citizenry. It is

beyond the scope of this article to sort out the specific strengths and weaknesses of traditional

versus user generated content. And, indeed, it would be inaccurate to assert such a strict

dichotomy, as the lines separating media organizations from their audiences become increasingly

blurred (Napoli, in press).

The contention here, however, is that, for all of its enhancements to the democratic

process, user generated content is not yet – and may never be – capable of *completely* satisfying

all of the behavioral criteria that we have traditionally associated with the institution of journalism. Therefore, policymakers need to promote the benefits of a media environment in which the opportunities to produce and distribute user generated content abound (see above), while simultaneously preserving those contributions to a media environment that fosters a well-informed citizenry that historically have been best provided by traditional news organizations. Again, this is not to say that these media organizations per se need to be preserved – only that their type of contribution to the institution of journalism needs to be preserved, even if done so via some other organizational form. Professionally trained journalists and editors that operate with the financial and legal backing of a journalistic organization represent a valuable contributor to the democratic process (Starr, 2009). The diminished presence of such communicators (as reflected in the lay-offs, cut-backs, and newspaper shutdowns that have characterized the journalistic sector in many countries in recent years) represents a threat to the institutional fourth estate that has emerged around the institution of journalism (Cook, 2005).

The Institution of Journalism and Media Policy

And so, if we agree that our traditional journalistic institutions produce something that is essential to a well-functioning democracy that can not be produced and distributed to a comparable extent in the realm of user generated content; and if we agree that the contemporary media environment is evolving in ways that may undermine the continued production and distribution of such content, then what, if anything, should media policymakers do about it? The increasing recognition of the future of journalism as a public policy issue can be seen, for instance, in the fact that the U.S. Federal Trade Commission has recently announced plans to open a proceeding on this very issue (Joshi, 2009).

In the U.S., recent discussions have focused on proposals such as allowing more mergers amongst traditional media outlets such as newspapers and television stations, or allowing newspapers to operate as non-profits, or distributing greater amounts of public and private funding to a variety of fledgling, Web-based journalistic organizations in order to better utilize the Web as an incubator for next-generation journalistic organizations (see Cooper, 2009). The first two of these proposals are focused on the preservation of specific platforms (e.g., print newspapers) or specific media organizations, and in so doing are, at best, very temporary solutions, given the inexorable migration of audience attention and advertiser dollars into the online space. The unit of analysis in the U.S. policymaking discourse must be elevated to the level of the institution of journalism, and not conflate this with specific platforms or organizations. If the future of journalism is inexorably tied to the future of the printed newspaper, or to the future of the *New York Times* Company, then the future of journalism is indeed grim.

In Europe, discussions have focused on if and how to establish a public service media sector that extends beyond broadcasting into the online realm. It is worth noting that the trend in recent decades toward privatization and commercialization of what were once primarily non-commercial media systems was driven in large part by the assumption that the commercial sector could serve the needs of the citizenry as well or better than the non-commercial sector. Now, in an environment in which the economic vulnerabilities of journalism, in particular, are becoming particularly acute, we find ourselves reconsidering the value of a public service media sector. In all likelihood, a greater commitment to the public service media sector will, at least in the short run, be essential to preserving the institution of journalism in the face of ongoing technological and economic changes.

What has been largely missing from all of these discussions up to this point, however, are efforts to look beyond the supply side of the problem (i.e., how best to promote the production of journalism) and consider the demand side of the problem as well. That is, policymakers and policy researchers need to also delve deeply into the dynamics of consumer demand for news, and to consider not only ways to cultivate the production of journalism, but also ways to cultivate the consumption of journalism. If indeed blogs, Twitter, and other forms of user generated content are not completely adequate substitutes for more traditional forms of journalism, then policymakers need to understand exactly how and why audience attention is migrating way from traditional journalism and towards these various forms of user generated content, and see if there might be any lessons to be learned from such inquiries in terms of how to re-stimulate demand for more traditional journalism; in terms of how to reconfigure or repackage such journalism in order to make it more appealing in today's media environment, or in terms of identifying more effective distribution models that better reflect the dynamics of contemporary media usage. The bottom line is, any policy interventions designed to preserve the production of journalism will not benefit the democratic process if this journalism is not consumed by the citizenry.

Conclusion

This article has sought to identify some of the normative and analytical media policy priorities that are emerging from today's converged media environment, in which the traditional boundaries separating media producers and distributors from media consumers are becoming increasingly blurred. At the core of this analysis is the notion of two seemingly conflicting policy priorities – the need to maximize access to audiences for all communicators and the need

to preserve traditional journalistic institutions in the face of an increasingly fragmented media environment in which, as it is frequently said, "everyone's a journalist."

The position here, however, is that these policy priorities are not really in conflict with one another if policymakers approach the notion of journalistic institutions in terms of the traditional meaning of the term institution. That is, as long as policymakers look to preserve certain structured behavioral practices, without conflating those with the preservation of particular platforms or organizations, than it seems reasonable to assume that those policy initiatives intended to enhance access to audiences could simultaneously preserve, protect, and even promote, the institution of journalism. Underlying this argument is the recognition that efforts to preserve journalism will, in all likelihood, need to look beyond the traditional platforms and organizational settings in which this institution has thrived for decades. In the end, however, it is clear that the converging media environment is profoundly changing media users and media institutions. The challenge confronting media policymakers is to assure that the net effect of these changes to the role that the media play in a democracy is positive rather than negative.

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Endnotes

[1] Razlogova (1995), for instance, documents how, by the 1940s, the commercial radio industry in the U.S. had embraced a "closed formal process" (p. 3) in terms of program production that largely ignored audience responses and feedback except in the more limited form associated with syndicated program ratings. Billings (1986) similarly chronicles a "silencing of [the audience's] voice" that took place in both the live theater and motion picture industries in the U.S. and the U.K.

[2] See Razlogova (1995), for instance, for a discussion of "recurring cycles of audience participation" in the history of broadcasting (p. 262).

[3] As Knight (2007) notes within the context of an analysis of the motion picture and home video industries, "distribution has always been the least visible part of our film industry and culture; and it has been and remains the most under-researched" (p. 24).

[4] As Croteau (2006) notes, "one key to the Internet's unique significance is that it provides the infrastructure necessary to facilitate the distribution of all forms of self-produced media to a potentially far-flung audience" (p. 341). Such acknowledgements of the significance of distribution capacity are rare in the ongoing discussions of user generated content and its implications.

[5] This relationship has been established in the "circulation spiral" literature, which has demonstrated that declines in ad pages lead to declines in readership, which, in turn, cause further declines in ad pages, leading to a continued downward spiral in both circulation and ad pages (see, e.g., Furhof, 1973; Rosse, 1980).