

BULGARIA

INTRODUCTION

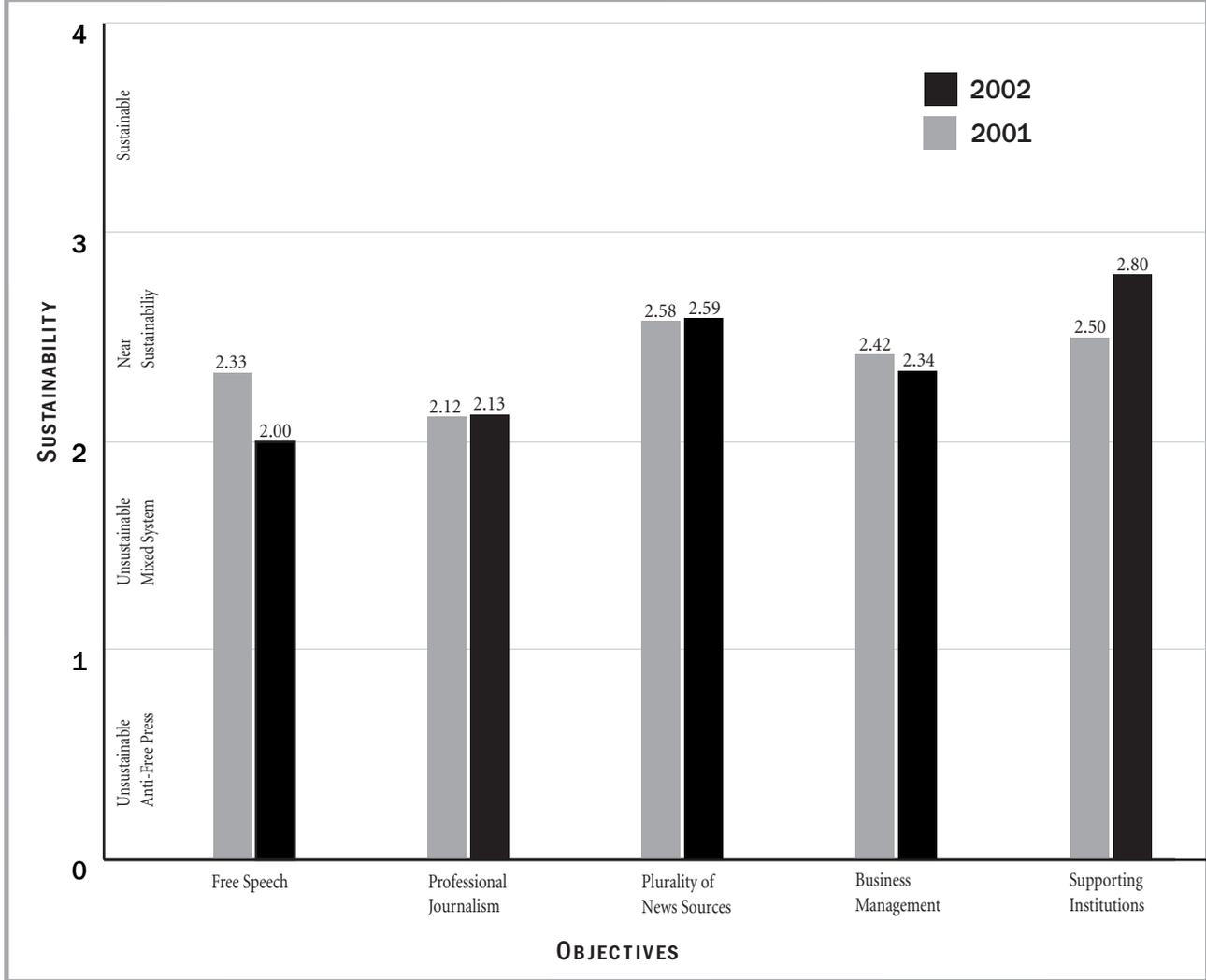
During the years of transition, Bulgaria has made significant progress in building a stable democracy and a free-market economy. Two consecutive governments since 1997 have implemented wide-ranging political and economic reform programs. Thanks to these reforms in November 2002, Bulgaria received an invitation to join the North Atlantic Treaty Organization (NATO) and is set to join the European Union (EU) in 2007. The country has managed to avoid ethnic and civil unrest and has played a constructive role in international efforts to resolve regional crises. For example, Bulgaria has acted as a de facto ally of the United States in the campaign against international terrorism after September 11.

Despite positive reforms, political, social, and economic problems typical to countries in transition still persist. In late 2002, the country seemed at the edge of a potential new political crisis. Popular disillusionment with the post-communist political elite, a sentiment that brought the former king-in-exile, Simeon Saxe-Coburg-Gotha, to power in 2001, is rapidly turning against him. In spite of his promises, the standard of living of the vast majority of Bulgarians has not improved significantly, and the economy remains stagnant.

These developments have influenced the media scene and are reflected in the 2002 Media Sustainability Index (MSI) report. Although the average scores prove that Bulgaria meets a basic level of media sustainability, the success of continued media development is still largely dependent on current political and government forces. The MSI panel determined that there is not a vast departure from last year's pace of media development. Rather, the media experts' assessment of the varying indicators shows growth in some areas and decline in others. The only significant improvement occurred in the institutions that support independent media. Meanwhile, recent events and developments in Bulgaria's media industry can explain a decrease in the ratings of some indicators. For example, attempts at political interference with the media are still prevalent. In fact, instances of pressure on the media from business and political interests have increased in the past several months. The link between "gray" and "black" markets and politics over-

The Bulgarian media scene could be facing a major restructuring period in the years to come.

BULGARIA—MEDIA SUSTAINABILITY INDEX



OBJECTIVE SCORING

The averages of all the indicators are averaged to obtain a single, overall score for each objective. Objective scores are averaged to provide an overall score for the country. IREX interprets the overall scores as follows:

3 and above: Sustainable and free independent media

2-3: Independent media approaching sustainability

1-2: Significant progress remains to be made; society or government is not fully supportive

0-1: Country meets few indicators; government and society actively oppose change

INDICATOR SCORING

Each indicator is scored using the following system:

0 = Country does not meet indicator; government or social forces may actively oppose its implementation

1 = Country minimally meets aspects of the indicator; forces may not actively oppose its implementation, but business environment may not support it and government or profession do not fully and actively support change

2 = Country has begun to meet many aspects of the indicator, but progress may be too recent to judge or still dependent on current government or political forces

3 = Country meets most aspects of the indicator; implementation of the indicator has occurred over several years and/or through changes in government, indicating likely sustainability

4 = Country meets the aspects of the indicator; implementation has remained intact over multiple changes in government, economic fluctuations, changes in public opinion, and/or changing social conventions

laps with the media industry. In several cases, important media outlets have been used in political campaigns against reforms, especially those aiming at Bulgaria's membership in NATO and the EU. Concurrently, the social impetus for supporting free speech seems to have lost steam.

In 2002, problems with media legislation increased. The government has been trying to amend the media law, with the obvious goal of replacing the management of the state-run radio and television stations. Also, the licensing of new media entities was halted without any legislative explanation. However, the political will is lacking to relieve the media of interference. Furthermore, the advertising market has not developed to the point that most media outlets could operate in a self-sustainable way. The abundance of print and broadcast media is only making the situation worse, especially for smaller and local print and broadcast media outlets.

Private radio is well established and competes successfully with the still-dominant Bulgarian National Radio (BNR). Radio networks, some with international investment, have developed across Bulgaria. On the other hand, the large number of new licenses issued over the past three years has dangerously fragmented the stagnant advertising market and threatens the ability of many stations to produce important programming like local news.

The print media are pluralistic, privately owned, and increasingly better managed. On the other hand, the adoption of professional standards remains a serious shortcoming. Reporting is often unprofessional, biased, and intolerant. Quality beat reporting in important areas like the judiciary system, the economy, local government, or ethnic relations is a rarity. Professional investigative reporting on exposing corruption and organized crime is limited to a few editions and needs sustained support. Important media outlets are being used openly for political campaigns, which undermines the credibility of the media as a whole.

Even though the amendments to the Radio and Television Law and the Telecommunications Law passed in 2001–2002 were seen as a major step forward, problems with the independence of the broadcast media persist. The new regulatory bodies, the Council for Electronic Media and the Committee for Regulation of Communications, are under direct political control. Special attention is needed to address issues like the independence of the state-owned media and the licensing process.

Professional associations of broadcasters and journalists are in place and have become active agents of independent media development. The Association of Bulgarian Broadcasters (ABBRO) and the Bulgarian Media Coalition (BMC) are actively promoting independent media, freedom of speech, and professionalism.

OBJECTIVE 1: FREE SPEECH

Bulgaria Objective Score: 2.0/4.0—The average overall rating for this objective shows that media legislation, an important safeguard for the freedom of speech, has faced problematic implementation. Bulgaria meets many of the aspects of social and legal norms that protect the freedom of speech and access to information, but progress is unstable and predicated by economic and political currents after last year's change in government.

Amendments in the media legislation introduced in 2002 have produced very mixed results. On the one hand, the Radio and Television Law adopted in late 2001 and the amendments in the Telecommunications Law adopted in 2002 represent significant progress toward

Legal and social norms protect and promote free speech and access to public information.	
Free Speech Indicators	Legal/social protections of free speech exist and are enforced.
	Licensing of broadcast media is fair, competitive, and apolitical.
	Market entry and tax structure for media are fair and comparable to other industries.
	Crimes against journalists or media outlets are prosecuted vigorously, but occurrences of such crimes are rare.
	State or public media do not receive preferential legal treatment, and law guarantees editorial independence.
	Libel is a civil law issue; public officials are held to higher standards, and the offended party must prove falsity and malice.
	Public information is easily accessible; right of access to information is equally enforced for all media and journalists.
	Media outlets have unrestricted access to information; this is equally enforced for all media and journalists.
	Entry into the journalism profession is free, and government imposes no licensing, restrictions, or special rights for journalists.

less government control in the regulatory process. The specialized commission responsible for the final stage of the licensing process under the previous broadcast law was cancelled, moving the regulatory process one step further away from direct political intervention. Cable and satellite broadcasters enjoy an easier registration procedure compared with the former licensing procedures. On the other hand, some key shortcomings of the old law resurfaced in the new legislation despite recommendations from independent media associations that were backed by organizations like the Council of Europe and the EU Commission. Most notably, members of the new Council for Electronic Media are elected in the same way as the previous regulatory body, the National Council for Radio and Television. This provision allows the ruling majority in parliament to appoint the decision-making majority in the Council. In addition, some changes in the media legislation were introduced retroactively in order to replace the members of the regulatory body and the head of state-owned Bulgarian National Television (BNT). The new Radio and Television Law introduced new eligibility requirements for candidates vying for the position of director general of BNT and BNR (state-owned Bulgarian National Radio). These requirements were implemented retroactively to remove the BNT director from office just three months before the end of her mandate. The panel shared the view that although many of the new provisions in the Radio and Television Law were nominally beneficial for the development of independent media, their implementation was either lagging behind or was contradictory to the declared motives for the introduction of the amendments.

The panel awarded the highest scores in this category to the indicators “access to the journalism profession” and to “access to international news.” Participants agreed that despite difficulties in the implementation of media legislation, the journalistic profession is open and accessible by everyone, without the state imposing any restrictions or special rights to those who are pursuing it. Similarly, media outlets in Bulgaria have unrestricted access to international press sources. The panel noted that both aspects of media development were achieved in the early 1990s, and no major development in either sphere was noted in 2002. However, some panel participants pointed out that small-sized media outlets have less of an opportunity to benefit from this access due to budget and technological limitations.

After the passage of a package of Freedom of Information Act (FOIA) laws and the Access to Public

Information Act, journalists and media outlets theoretically have access to public information. The Classified Data Protection Act and the Personal Data Protection Act are in place and regulate access to restricted information. In fact, these laws are being enforced, as journalists have won lawsuits when information has been denied to them. The panel, however, noted that there is a big gap between the legal provisions and the extent of their implementation by various state institutions. The national government, its ministries and agencies, the legislatures at national and local levels, the local government institutions, and especially the judiciary tend to disregard their obligations under the FOIA laws. Often, only sustained public pressure forces improved implementation practices. The court system is not always willing to effectively handle the media-related cases brought their way. The level of implementation of the FOIA laws varies between institutions and changes with each turnover of government or key personnel.

One journalist on the panel stated, “Journalists live in constant fear of having to prove their point, often by disclosing their sources, which is unthinkable. Often a journalist will refrain from exposing anything in case they are forced to prove it. Regulations have to be revised so that the offended parties have to prove falsity.”

The fairness of the licensing process and the requirement for equal legal treatment of state and independent broadcast media received the lowest scores among the indicators in this category. The panel noted that there are big differences between the official legal provisions and the regulatory practices. Panel members mentioned that the licensing procedure should ideally be nonpoliticized and competitive, as stated in the Radio and Television Law and the Telecommunications Law. In the past year, however, licensing of media outlets has practically halted, making it impossible to judge whether the new regulatory arrangements guarantee a high degree of fairness and transparency. The Bulgarian government and parliament have effectively blocked all licensing by not adopting the official tar-

iffs for licensing. Without these tariffs, licensing new broadcasters and renewing established licenses is legally impossible. Panel participants suggested that inaction by the authorities resulted from their lack of “political confidence” in the regulatory body, prompted by the appointment of the director general of BNT. A disinterested public has purposefully ignored the issue. A panelist explained the situation this way: “Licensing is halted until the adoption of a licensing strategy. Executive power did not fulfill its obligations, so over the last year not a single license was awarded. The Council of Ministers did not bother to establish licensing tariffs, and now the licensing process is on hold due to government inaction and political pressure. The law was deliberately derailed, and the industry regulators were deprived of their licensing powers.” The Radio and Television Law does not provide equal legal treatment of state-owned and independent broadcasters. BNT and BNR receive significant state subsidies and are allowed to sell advertising. Panel participants noted that BNT and BNR are also granted privileged access to cover important events. Political influence over state programming is visible, and the government outlets haven’t made much progress in the transition from state to public broadcasters.

Panelists agreed that progress needs to be made regarding editorial independence. Practice shows that political and economic interests can impose or interfere with the decision-making of both public and independent outlets. One journalist on the panel stated: “Journalists live in constant fear of having to prove their point, often by disclosing their sources, which is unthinkable. Often a journalist will refrain from exposing anything in case they are forced to prove it. Regulations have to be revised so that the offended parties have to prove falsity.”

Market conditions, tax structures, and free-market regulations for the media received relatively low scores by the panel because of three main obstacles: the underdeveloped advertising market, the preferential legal treatment of state-owned radio and television, and the illegal concentration of the print and commercial television industry. BNT receives an annual subsidy equal to one-half of the overall advertising market in the country and also gets more than 40 percent of the overall television advertising revenues. Networks of media outlets and advertising and polling agencies have formed in radio and especially in television, leaving little room for free competition. The German publisher Westdeutsche Allgemeine Zeitung (WAZ) owns well

over 50 percent of the newspaper circulation in the country, making the financial survival of smaller local publications extremely difficult.

Libel remains a criminal issue, and in court journalists must prove validity of their claims against the offended. Even though prison terms for libel and defamation have been replaced with heavy fines, the cases are still being reviewed under the criminal code. State officials and other public figures are granted privileged protection in libel and defamation cases. Such charges are often used to harass journalists, especially in smaller towns. No progress has been made in 2002 to resolve that issue, the panel noted.

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The Constitution provides for the freedom of speech, and all experts acknowledge the existence of such protections. The problem is in the implementation of these provisions. Furthermore, public opinion is still not sensitive enough to the values of free speech to the point that the public would defend these rights when they are violated. One panel member stated: “Freedom of speech is still not held in high esteem by the public, although it is society’s greatest value. I think the public does not regard freedom of speech violations as blows to its own dignity. Our legal system is not effective in this respect, and it is generally quite clumsy and selective. Sometimes the legal system itself is a threat to the freedom of speech.”

The objectivity and compatibility of market and tax mechanisms in the media field are damaged by the lack of specialized and effective antitrust regulations. In some cases, politicians have favored public (state) outlets at the expense of private media. On the other hand, state institutions sometimes keep a blind eye to entities working without licenses.

OBJECTIVE 2: PROFESSIONAL JOURNALISM

Bulgaria Objective Score: 2.13/4.0—Bulgarian journalism is beginning to comply with international professional standards, but the developments are quite recent and are still dependent on current social and

political processes. Despite the relatively low scores from the panel, there are definite areas of improvement. All media, even commercial outlets, manage to focus on newsworthy events. Entertainment elements do not eclipse informational programming. The panelists agreed that reporting is fair and well sourced. However, there are still cases of airing unverified information, and the number of background sources is often only two. There are still subjective programs on state television, which do not present more than one side of the issue. A panel member stated: “There are enough examples from the past year of one-sided reporting. A program on state TV lacks objectivity in 90 percent of the cases and doesn’t even bother to double-check its facts.”

The implementation of professional ethics still has not reached sustainable levels. Many codes of ethics exist, but their utility is questionable. Employees of private print media outlets are still largely dependent on the owners’ interests and political convictions. Some print media outlets are run as propaganda outlets for the special interests of their owners and do not even pretend to practice professional journalism. Such publications have been involved in open political campaigns and have disregarded any professional criteria in their work. As a general rule, there is no clear demarcation between the management, the sales departments, and the editorial departments of many print and broadcast media outlets. As a result, reporting is often biased, and

news is distorted. Some readers are forced to compare the conflicting versions from different publications in order to get a more balanced interpretation. Positive practices have only started to emerge in big independent broadcast media. As the panel participants noted, there are cases of reporters accepting gifts, but such cases are very difficult to prove, much less prosecute. As one panelist explained, “There are codes, but no one complies with them. The fact that journalists accept gifts and willingly ignore their freedoms and responsibilities is not a well-kept secret.”

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Experts share the opinion that self-censorship is still practiced. It is driven by political pressure in the public media and by economic interests in the privately owned outlets. Some of the panel participants noted that self-censorship, disguised as “loyalty to the publisher,” is becoming a common practice. In fact, it is becoming a standard requirement for hiring journalists.

The remuneration of journalists remains the most problematic area for this objective. Pay levels differ from state to private entities. The really meaningful difference, though, is between metropolitan and regional outlets. Regional media professionals earn significantly less than their colleagues in the cities. This huge disparity is in line with the gap in pay between many urban and rural industries, but it is a major obstacle to the creation of a sustainable media sector in Bulgaria. In the words of one media expert: “People at a regional radio or cable channels earn much less than those at a Sofia outlet. To me, this is an example of discrimination against Bulgaria’s regions. To a great extent, Bulgaria is still pretty much Sofia.” On the other hand, participants in the panel recognized that different pay levels are to

Journalism meets professional standards of quality.	
Professional Journalism Indicators	Reporting is fair, objective, and well sourced.
	Journalists follow recognized and accepted ethical standards.
	Journalists and editors do not practice self-censorship.
	Journalists cover key events and issues.
	Pay levels for journalists and other media professionals are sufficiently high to discourage corruption.
	Entertainment programming does not eclipse news and information programming.
	Technical facilities and equipment for gathering, producing, and distributing news are modern and efficient.
	Quality niche reporting and programming exists (investigative, economics/business, local, political).

a large extent a reflection of the different advertising markets in Sofia and elsewhere. Panelists noted that small publications operating in small markets could not sustain higher salaries.

Quality niche reporting and programming in the Bulgarian media appear to be in very short supply. A few publications, among them some of the most influential ones, have developed good investigative reporting and show a growing level of professionalism in covering political events, local government, and the economy. Panel participants pointed out that good investigative reporting is still limited to a few media outlets and is often dependent on donor support.

OBJECTIVE 3: PLURALITY OF NEWS SOURCES

Bulgaria Objective Score: 2.59/4.0—In general, there is a plurality of media in Bulgaria. Hundreds of print and broadcast media outlets independent from the government are in operation, providing a wide variety of information and opinions. Citizens in Bulgaria have unfettered access to local and international news sources. However, financial and sometimes technological restraints still impair access to such sources. The Internet is still not a largely accessible medium in some areas. Furthermore, access to foreign chan-

nels and cable subscriptions is limited due to the high costs involved. One panelist explained, “Plurality is not an issue. Access to sources is. Having done the simple math, plurality applies to just a segment of the population. Some regions are discriminated against. Sofia and the principal cities have an absurd number of sources, while some regions don’t have any.”

The panelists believe there are no objective obstacles for the existence of minority-language media. For the most part, government and business groups are not interested in limiting the proliferation of minority outlets. The low penetration of such media is mainly due to the relatively small size of minority groups in Bulgaria. Furthermore, public opinion does not favor the expansion of minority-language media. On the other hand, Turkish-language media broadcast news on state radio and television without meeting any notable public or political resistance. Few minority-language media exist, and most of them subsist due to international donor support. With the exception of one recently launched Roma cable television station, most minority-language media have very limited circulation or penetration due to the lack of state budget support for or commercial interest in such media.

A variety of public and private news sources exists in Bulgaria, and most media are fairly accessible. Unfortunately, access is limited in the regions. Rural and village audiences simply do not have sufficient access to modern media mainly due to poor infrastructure. Telecommunications networks aren’t developed enough for widespread Internet access, and the distribution channels for print media are also lacking. For years, the licensing of independent radio and television stations has been limited to local and regional stations in more populated areas. Recently licensed independent broadcasters with national coverage do not cover less populated areas either, leaving many Bulgarians without access to anything but state broadcasting.

Several new Internet-based publications were launched in 2002, adding to the plurality of media. However, high Internet subscription fees, low penetration, and poor-quality phone lines limit membership in the regional and small-sized markets.

The panel agreed that Bulgarian media are able to reflect a broad spectrum of social views and generally avoid subjectivity or partisanship. Nevertheless, political pressure on media outlets increases in time of crisis. Some employees of state media outlets take political influence for granted and reshape their work to fit the current political situation. Public television does

Multiple news sources provide citizens with reliable and objective news.	
Plurality of News Sources Indicators	A plurality of affordable public and private news sources (e.g., print, broadcast, Internet) exists.
	Citizens’ access to domestic or international media is not restricted.
	State or public media reflect the views of the entire political spectrum, are nonpartisan, and serve the public interest.
	Independent news agencies gather and distribute news for print and broadcast media.
	Independent broadcast media produce their own news programs.
	Transparency of media ownership allows consumers to judge objectivity of news; media ownership is not concentrated in a few conglomerates.
	A broad spectrum of social interests are reflected and represented in the media, including minority-language information sources.

not satisfy the demand for cultural and educational programming, although public radio does provide a somewhat wider range of public-service programming. In general, there is a serious problem with the ability of state broadcasters to serve the public interest in a balanced way. Little progress in that direction has been made over the years, media legislation does not support the transition from state to public media, and there is a lack of political will to support such transition. Private broadcasters have attempted to fill the niche of public-service broadcasting and often produce current affairs and cultural programs that serve the general public interest better than programming on state television.

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Panel participants noted that for the first time there is less direct government interference with the programming of state broadcasters. The current Bulgarian government has not repeated the mistakes of its predecessors by imposing strict censorship of BNT and BNR. However, this lack of censorship has not resulted in more independent public media. Self-motivated pro-government elites have seized the opportunity to control broadcast media through the Council for Electronic Media (CEM). These elites are not only interested in imposing their own political views, but also seek to control the advertising revenues of two of the country’s largest broadcasters.

Transparency regarding the ownership of media does not exist in practice. Even though the Radio and Television Law requires a certain level of transparency in this regard, many broadcast outlets are controlled by entities not involved in daily broadcast operations. There are no limitations or requirements for transparency of ownership of the print media, and few of them state openly who controls them. Some newspapers and broadcasters are owned by offshore companies, and their actual ownership is only a subject of speculation. Panel participants shared the concern that legal capi-

tal generated from criminal activity may be playing a larger role in the advertising and media market in Bulgaria. Another concern is the cross-ownership of media outlets and advertising and polling agencies. As one panelist said, “The Radio and Television Law is being drastically violated, and in the face of the public, too. There is no political will for regulation, for introducing at least basic transparency. Since the free speech draft law, not a single bill has had a provision on capital transparency, forbidding share warrants or offshore capital.” At the same time, a few media monopolies completely dominate the market. German publishing conglomerate Westdeutsche Allgemeine Zeitung (WAZ) controls more than 50 percent of the newspaper market through two of the best-circulated dailies.

OBJECTIVE 4: BUSINESS MANAGEMENT

Bulgaria Objective Score: 2.34/4.0—The average score gauging independent media as well-managed businesses has not improved since last year. But that is only part of the story. The media industry is somewhat polarized when it comes to business management. A few big media outlets are run as professional media outlets comparable to generally accepted Western standards for business efficiency. However, the vast majority of smaller and local media are drastically underdevel-

Independent media are well-managed businesses, allowing editorial independence.	
Business Management Indicators	Media outlets and supporting firms operate as efficient, professional, and profit-generating businesses.
	Media receive revenue from a multitude of sources.
	Advertising agencies and related industries support an advertising market.
	Advertising revenue as a percentage of total revenue is in line with accepted standards at commercial outlets.
	Independent media do not receive government subsidies.
	Market research is used to formulate strategic plans, enhance advertising revenue, and tailor products to the needs and interests of audiences.
	Broadcast ratings and circulation figures are reliably and independently produced.

oped. As a result, the development of Bulgarian media as sustainable businesses seems to have leveled off, as the average score of the panel indicated no further progress toward sustainability from last year. As the gap between large and small outlets widens dramatically each year, it is safe to say that many of the smaller publications are facing a very uncertain future. Furthermore, the Bulgarian media scene could be facing a major restructuring period in the years to come. Unfortunately, this division is not only the result of natural competition, but it also reflects a heavily manipulated media market that favors some media at the expense of others.

The rapid growth of the number of broadcast media outlets in previous years has made survival in a stagnant advertising market extremely difficult for smaller media. Some panelists noted that market trends indicate good growth prospects for the advertising market in general. However, the unfair distribution of revenues between the different outlets does not reflect the size and quality of their audiences. The panel approved of the fact that independent outlets do not receive state subsidies and underlined the fact that most of them are run as professional businesses and work very effectively. Nevertheless, some structural problems persist. Large distribution companies are owned by big newspapers, placing low-circulation publications in an unfavorable position. “The biggest problem is the distribution of low-circulation and niche publications, which ensure the plurality of the media environment,” said one of the panelists. Another other key issue was the conflict of interest arising from cross-ownership of ratings agencies, advertising agencies, and media outlets.

The media industry in Bulgaria is divided among a few very powerful media outlets that control 90 percent of the advertising market. Meanwhile, hundreds of small local stations and publications survive with the remaining 10 percent of the market. Panelists agreed that the local stations’ relations with advertising firms are poor. The small advertising market and the rapid proliferation of media present many challenges for the survival of small and newly emerging outlets. Regardless, advertising revenue continues to be the primary source of income for the Bulgarian media.

The media’s use of market research is inconsistent. Even though many agencies measure ratings and market share, there is one company that has established itself as the major source of data for media ratings. This near monopoly on statistics leads some to question the objectivity of the data. As mentioned many times during the discussion, the owners of the People Meters

also own media outlets and advertising agencies and are in a position to influence the market in their favor. Attempts are in place to deal with this conflict of interest by supporting alternative market-research agencies. Despite these attempts, the lion’s share of advertising in Bulgaria is being distributed between a few media outlets based on criteria that do not objectively reflect the actual situation in the media market.

OBJECTIVE 5: SUPPORTING INSTITUTIONS

Bulgaria Objective Score: 2.80/4.0—The institutions that support independent media in Bulgaria have experienced tremendous growth in the past year. The panel pointed to the increased activity of media associations and unions in opposing political attempts at appointing a partisan director general of the state radio station, and in halting the passage of unacceptable changes to the Radio and Television Law. According to one panel member, “The passage of a bill is now unthinkable without consultation with the Association of Bulgarian Broadcasters (ABBRO) or the Bulgarian Media Coalition (BMC).” The notable success of ABBRO and BMC in such key areas has convinced the media experts that professional media associations are able to represent the interest of independent media and to provide valuable member services. Nongovernmental organizations (NGOs) that support free speech and

Supporting institutions function in the professional interests of independent media.	
Supporting Institutions Indicators	Trade associations represent the interests of private media owners and provide member services.
	Professional associations work to protect journalists’ rights.
	NGOs support free speech and independent media.
	Quality journalism degree programs that provide substantial practical experience exist.
	Short-term training and in-service training programs allow journalists to upgrade skills or acquire new skills.
	Sources of newsprint and printing facilities are private, apolitical, and unrestricted.
	Channels of media distribution (kiosks, transmitters, Internet) are private, apolitical, and unrestricted.

independent media also received relatively high scores by the panel. As one participant noted, the cooperation between NGOs and the media associations within the BMC has given additional strength to the media's voice in issues related to media legislation and protection of freedom of speech.

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Despite the wide range of journalistic unions, panelists share the opinion that the rights of professional journalists are not protected to the desired extent. Their membership is mainly made up of elderly journalists and professionals from the public media outlets. Such organizations fail to provide the necessary level of protection for the employees of independent media groups. A panelist characterized these organizations in this way: "Groups that protect journalists' rights do exist, but the quality of the services they provide regarding legal assistance, professional advice, and lobbying is still questionable."

Printing and publishing companies are largely in private hands, and are generally apolitical. Even the state-owned companies are profit-driven and remain competitive with independent firms.

The lowest score in this category was given to higher education in journalism. Bulgarian universities still do not provide a high level of journalism education. Journalism programs especially lack the substantial practical training young journalists need. Unfortunately, other indigenous training facilities for broadcasters and journalists are extremely limited in Bulgaria. Special mention was given to the IREX/ProMedia Broadcast Training Center as the only television training facility in the country. The panel also noted that without donor support such training facilities would not be able to exist at all. Very few media outlets have any kind of in-house training. It is a notable fact that professional training is even less accessible by journalists outside of Sofia. Indeed, there are a relatively small number of media professionals who regularly participate in training sessions. The opportunities for training are not sufficiently publicized to attract interested journalists and broadcasters from outside the capital. "I think there is a deficit in educating young journalists. State education is unsatisfactory, especially from the practical perspective. Graduates leave the university with hardly any practical knowledge of the skills needed at a radio station or TV channel. They have zero practical abilities," says one panel participant.

In general, there is a notable disproportion between the positive role played by supporting institutions in the development of independent media in Bulgaria and the insufficient professional training available to media practitioners. Panel participants pointed out that professional development remains an important issue for the Bulgarian media that needs increasingly more attention and support.

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