The media sustainability indicator that draws the most criticism from panelists is the level of professional and ethical integrity of Bulgarian journalists and editors. Noted already as an alarming tendency last year, self-censorship is clearly on the rise in 2010.



BULGARIA

The MSI panel concluded that the Bulgarian media environment is in crisis, and slipping away from sustainability in a growing number of indicators. For a second year running, the MSI survey clearly demonstrates the decline affecting the country's media. Not only is the MSI score for Bulgaria lower than last year's; the 2011 score takes Bulgaria back to a score comparable to the one it received in the 2003 study.

Although some sustainable achievements are unlikely to be reversed, Bulgarian media still fail to capitalize on these aspects and make progress. The MSI panelists agree it is always the same forces at play that contribute to the decline in media sustainability in Bulgaria: the economic crisis and the media's unhealthy ties with politics and business.

A wealth of information sources is undeniably among the achievements of the Bulgarian civil society. The media's unrestricted access to news consistently tops the list of high-scoring indicators, and this free access of the media—and citizens—to sources of news and information is a solid foundation for the freedom of speech. Other strengths include the technical equipment of the country's leading outlets, and the quality of news programs they produce, as well as the favorable market and tax conditions in the industry.

The media sustainability indicator that draws the most criticism from panelists is the level of professional and ethical integrity of Bulgarian journalists and editors. Noted already as an alarming tendency last year, self-censorship is clearly on the rise in 2010. The upsurge in self-censorship is not completely surprising, perhaps, in view of the consistently low pay levels in the industry—an issue that panelists have repeatedly highlighted in previous MSI studies.

Other underachieving indicators that hold the country's overall sustainability down are the low efficiency and organizational capacity of professional journalists' associations, the lack of transparency of media ownership, and the distribution of government advertising. The growing dominance of entertainment programming and the inadequate supply of continuous in-service training are also to blame for the country's overall performance.

The underperforming indicators—a substantial portion in the unsustainable, mixed system range—imply uneven and inconsistent development, and lack of political commitment and support within the industry for a transition towards media sustainability.

BULGARIA AT A GLANCE

GENERAL

- > Population: 7,148,785 (July 2010 est., CIA World Factbook)
- > Capital City: Sofia
- > Ethnic Groups (% of population): Bulgarian 83.9%, Turk 9.4%, Roma 4.7%, other 2% (CIA World Factbook)
- > Religions (% of population): Bulgarian Orthodox 82.6%, Muslim 12.2%, other Christian 1.2%, other 4% (CIA World Factbook)
- > Languages (% of population): Bulgarian 84.5%, Turkish 9.6%, Roma 4.1%, other and unspecified 1.8% (2001 census)
- > GNI (2009-Atlas): \$45.96 billion (World Bank Development Indicators, 2010)
- > GNI per capita (2009-PPP): \$12,750 (World Bank Development Indicators, 2010)
- > Literacy Rate: 98.2% (male: 98.7%, female: 97.7%) (2001 census)
- > President or top authority: President Georgi Parvanov (since January 22, 2002)

MEDIA-SPECIFIC

- > Number of active print outlets, radio stations, television stations: Print: 211 newspapers; Radio Stations: 76; Television Stations: 217 (Peiro97)
- > Newspaper circulation statistics: Total daily circulation: 340,000 (Market Links)
- > Broadcast ratings: Top three television stations: bTV, NOVA, BNT1
- > News agencies: Bulgarian Telegraph Agency (state), BGNES (private), Focus Information Agency (private)
- > Annual advertising revenue in media sector: \$256 million (Market Links)
- > Internet usage: 3.39 million (2009 est., CIA World Factbook)

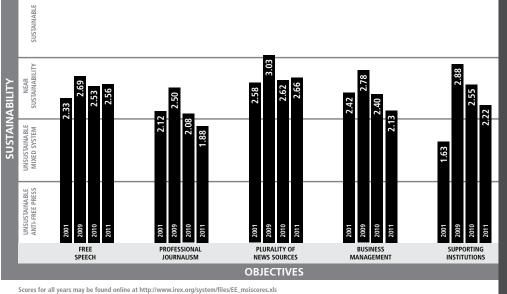
Unsustainable, Anti-Free Press (0-1): Country does not meet or only minimally meets objectives. Government and laws actively hinder free media development, professionalism is low, and media-industry activity is minimal.

Unsustainable Mixed System (1-2): Country minimally meets objectives, with segments of the legal system and government opposed to a free media system. Evident progress in free-press advocacy, increased professionalism, and new media businesses may be too recent to judge sustainability.

Near Sustainability (2-3): Country has progressed in meeting multiple objectives, with legal norms, professionalism, and the business environment supportive of independent media. Advances have survived changes in government and have been codified in law and practice. However, more time may be needed to ensure that change is enduring and that increased professionalism and the media business environment are sustainable.

Sustainable (3-4): Country has media that are considered generally professional, free, and sustainable, or to be approaching these objectives. Systems supporting independent media have survived multiple governments, economic fluctuations, and changes in public opinion or social conventions.

MEDIA SUSTAINABILITY INDEX: BULGARIA



OBJECTIVE 1: FREEDOM OF SPEECH

Bulgaria Objective Score: 2.56

The score for this objective remains unchanged from last year's mark. In certain areas, like broadcast licensing, panelists saw movement in the right direction although it still lagged half a point behind the objective score. Elsewhere, for example, in access to public information, the panelists point to backsliding.

Panelists agree that a legal framework is in place to guarantee the freedom of speech, and it generally meets internationally accepted standards. Some legislative and judicial activities improved the media environment in 2010, including passage of the Amended Radio and Television Act, and the introduction of amendments to the Compulsory Deposition of Printed and Other Publications Act that mandate periodicals to disclose actual owners.

But there are blunders, too, in actually enforcing the law, as well as a lack of strong public sentiment against attempts to suppress free speech. Svetla Petrova, a bTV journalists, said, "Overall, the legal framework to guarantee freedom of speech is comparable to that in mature democracies. The problems are mostly related to the actual enforcement, and public awareness and support are lagging behind." For

LEGAL AND SOCIAL NORMS PROTECT AND PROMOTE FREE SPEECH AND ACCESS TO PUBLIC INFORMATION.

FREE-SPEECH INDICATORS:

- > Legal and social protections of free speech exist and are enforced.
- > Licensing or registration of media protects a public interest and is fair, competitive, and apolitical.
- Market entry and tax structure for media are fair and comparable to other industries.
- Crimes against media professionals, citizen reporters, and media outlets are prosecuted vigorously, but occurrences of such crimes are rare.
- > The law protects the editorial independence of state or public media.
- > Libel is a civil law issue, public officials are held to higher standards, offended party must prove falsity and malice.
- Public information is easily available; right of access to information is equally enforced for all media, journalists, and citizens.
- > Media outlets' access to and use of local and international news and news sources is not restricted by law.
- Entry into the journalism profession is free and government imposes no licensing, restrictions, or special rights for journalists.

For example, Ivan Mihalev, a journalist with The Capital Weekly, said, "Journalists are being intimidated if they do not please those in power. A shining example is the arrest of the Galleria reporter [Dobromir Dobrev] investigating the real estate holdings of Deputy Prime Minister Tzvetanov."

example, wire tapping without a court order is illegal, but wire tapping cases are not prosecuted and do not reach the courts. Leaked transcripts from wire tappings show that the authorities monitor a large number of journalists. The police claim that such wire tapping only happens with a court order, and in order to prevent or gather information about a crime, but there are widespread fears of indiscriminate wire tapping without proper court orders. Petko Georgiev, a BTC ProMedia journalist, commented, "Moving toward large scale electronic surveillance will make the confidentiality of sources pointless. Why ask journalists who they have been talking to when you have the phone transcripts? This is a serious threat to the confidentiality of sources."

In addition, the cabinet passed a set of amendments to the criminal code. Stoyana Georgieva, editor-in-chief of MediaPool.bg, commented that they could turn out to be a backdoor to censorship. Although the amendments have not passed through parliament, the panelists nevertheless expressed concern that the council of ministers would adopt such legislation. The government is believed to favor tougher measures, and is known to have tested the ground for a dedicated libel law and tougher punishments than currently exist.

Furthermore, not only does the public fail to support journalists, journalists cannot rely on their employers to stand behind them. Chavdar Stephanov, a TV+ journalist, pointed to the Bulgarian National Radio (BNR) local correspondent in Stara Zagora as a relevant example. Sued for libel by the former minister of social affairs, she has been tied up in lawsuits for several years now, and getting no help from the editorial board. Her employer, the state-owned Bulgarian National Radio, does not stand by her and does not give her legal support.

Despite the lack of positive development on some points related to licensing, this year licensing scores improved. There have been changes—however questionable—in the regulatory bodies, and there have been new licenses issuedDespite these successes, panelists continue to be critical of the slow pace of the judiciary in libel cases against journalists and outlets. Stephanov commented, "It takes three to four years for good to prevail."

both analog and digital. That is notable, as prior to passage of the new Radio and TV Act no licensing was occurring. However, Assya Kavrakova, of the Open Society Institute, commented, "There has been a surge in the number of digital licenses issued this year. As to other indicators, there is hardly any significant progress."

For instance, the licensing process continues to be viewed as largely non-transparent. Panelists agree that limiting the number of the Council of Electronic Media (CEM) members (one of the Radio and TV Act amendments introduced this year) has made the regulator more prone to political and economic influence. Georgiev said, "...there's no quality change in the way [that members of the CEM] are elected and appointed. To me there is simply another way to control the regulators." By decreasing the number of Council members, the ruling majority in Parliament managed to establish a majority in the Council as well, by circumventing rules allowing the president to appoint new members (the president and the ruling majority in are in fierce opposition to each other). Dilyana Kirkovska, of CEM, added that CEM organized and held open competitions to elect heads of the public radio and television.

In addition, digitalization is way behind schedule, and there is no public debate on the topic.

The market entry and tax environment for the media are comparable to other business fields; the media do not receive any tax breaks. The average value for this indicator is largely unchanged, but there are ongoing debates on a number of related issues. One is whether CEM should be collecting fees from outlets for periods between the licensing and actual launch of broadcasts. Kirkovska noted that most outlets that were required to pay fees for such time periods filed appeals. Another question is whether blogs should be considered media outlets, and pay taxes like the rest of the media.

The panelists reported no cases of violence against journalists in 2010. However, they could not point to any progress, either, in investigating and punishing crimes from previous periods. Panelists agree that a widespread sense of impunity for crimes against journalists continues to affect media professionals. The panelists did share examples of political pressure against journalists covering the property status of cabinet ministers and other prominent officials in the state and local administration. For example, Ivan Mihalev, a journalist with *The Capital Weekly*, said, "Journalists are being intimidated if they do not please those in power. A shining example is the arrest of the *Galleria* reporter [Dobromir Dobrev] investigating the real estate holdings of Deputy Prime Minister Tzvetanov. This amounts to abuse of power by the police—an attack on freedom of speech to please a politician.¹

Danail Danov, a media expert from Sofia, said, "Crimes against journalists remain unpunished," but added that in his opinion, the media work in tabloid style rather than in the public interest. Danov cited a number of cases of unpunished crimes: "The assault on Ognyan Stephanov remains unsolved. Charges against the Galevi brothers for pressuring journalists have been dropped. Their employees, Apostol Chakalov and Vladimir Angelov (found guilty for threatening reporters) were given minimum sentences, which—it turned out—they served during the preliminary arrest. As a result, fear has tightened its grip. The witnesses in the Galevi trial say they fear retribution more than ever."

A serious concern is the lack of wide public response, or even a burst of indignation against crimes targeting journalists and the media. Panelists believe one of the reasons for this ongoing trend is the overall lack of public sensitivity to violations of human rights in general, as well as the low esteem of journalism as a profession. On the other hand, there is also a complete absence of solidarity and joint defense of journalists' rights-due, perhaps, to a twisted understanding of competition and the need to standing one's own ground on the market. Commented Ivo Indzhev, a journalist and blogger, "There is an outrageous lack of journalistic solidarity in Bulgaria. It's a deliberate, conscious refusal to support fellow journalists. I don't know what else must happen for journalists to stand up than a journalist getting beaten near death, like Ognyan Stephanov.² And it's only because media outlets are territorial. When a news photographer gets robbed of their camera, it is news for the affected paper only. The others will not bother to cover itthey would not want the competition to gain publicity."

¹Police held Dobromir Dobrev, a *Galeria* reporter, and the newspaper's driver for a few hours for questioning. He was writing a story about the country house of the Minister of the interior, when a local resident called the police and accused the journalist of trying to run her down with his car. The reporter was released after a couple of hours and the case did not go to court.

²Ognyan Stephanov was the editor-in-chief of a news website closely related to current and former secret service agents, and a businessman. In 2008, the journalist seemed to have been caught in the crossfire between them.

On the level of public tolerance for crimes against journalists, Kavrakova added, "The public is not simply turning a blind eye—it expects and demands this treatment. It's an environment that tolerates violations of human rights. And that's the worst thing, it's not only about the media." Georgiev concluded, "One of my biggest fears is that the public is growing numb, worryingly senseless. It almost feels like the crowd is pleased when a journalist gets beat up. We're in the same boat with lawyers, politicians and customs officers—society's traditional bad guys. And that's a sad thing to say. In the early nineties, journalists were among the most respected guilds. We're now at the bottom."

The score assessing the editorial independence of the public outlets changed little from last year. In spite of the amendments to the Radio and TV Act, the level of the editorial independence of public radio and television is virtually unchanged. Kirkovska commented, "From a legal point of view, the new Radio and TV Act brings no change. The editorial boards of the BNR and BNT are still elected the way they used to: with a Council of Electronic Media vote."

What most of the panelists are concerned with is not the transparency of state funding for the public media, but the transparency in how the funds are being spent. In 2010, the media trained much focus on competitions to appoint new directors general of the Bulgarian National Television and Radio. The Boards of BNT and BNR are appointed by the general director and have limited functions. They usually include well-known experts and media figures, acceptable to the ruling majority. The public media are independent from the government on paper, but in reality they are (willingly) subject to constant government pressure. They are trying to balance their act, but a bias in favor of the government is common and indeed expected.

Regarding libel laws, from a legislative point of view, there's been no change—libel continues to be a criminal offense. However, in 2010, there have been examples of charges being dropped against journalists in lawsuits going on for years. Georgiev described, for example, the case of Boyko Stankushev and Milena Dimitrova, of "Na Chisto." Defendants in a libel case that went on for nearly five years, they were acquitted this year after the last appeal was heard. The plaintiff, a prosecutor, was offended by a Na Chisto episode in which a police investigator accused him of corruption. The prosecutor filed a lawsuit against the program host and the investigative reporter—not against the interviewee. It was his choice of target. The two journalists were found not guilty and the decision is now final.

Despite these successes, panelists continue to be critical of the slow pace of the judiciary in libel cases against journalists and

outlets. Stephanov commented, "It takes three to four years for good to prevail."

In Bulgaria, the burden of proof is on the defendant, though there is court practice in favor of higher responsibility and greater transparency for public figures. The panelists noted that the number of libel cases is limited, but there are no known cases of corruption involving libel court proceedings.

Access to public information is guaranteed by law, but the altogether negative trends are reflected in a lower score that compared with last year. The biggest issue is the growing propensity of public institutions to engage in procedural maneuvering to delay and obstruct attempts by the media and citizens to obtain public information by both the public and the media. Kavrakova said, "There's one access law for all, but there are striking differences in how the law is applied. Some institutions pretend to be responsible, but all too often they will openhandedly provide you with details of little consequence, while jealously guarding information of great public importance." Petrova agreed, and said that the government institutions are really mastering the art of obstructing public access to significant public information. Georgieva added, "Institutions are trying hard to dodge the responsibility to provide public information. It's hard for journalists to do their job."

In general, all journalists have equal access to information; bloggers or freelancers are not denied access for lack of press credentials.

In 2010, various advocacy groups were swift to react against the government's attempts to restrict the free access to the corporate register (a move initiated by major business associations, with the goal of protecting personal data. The issue was covered by the majority of Bulgarian media and prompted much public discussion. The final decision is to be made next year. Mihalev commented, "We're backsliding in terms of access to public information. The impending amendments to the Corporate Register Act aim to limit the publicly available information about companies in Bulgaria. Public institutions continue to have a piecemeal approach to journalists' requests and filter the provided information: it's easy to obtain anything that implicates the previous government; while inconvenient information is kept under wraps.

Still, panelists noted some positive developments, too, regarding access to public information. For example, they see an increasing amount of information available on institutional websites. Mihalev shared one small but significant victory in 2010: The Publishers' Union came together and got behind a common cause; it requested information from the Finance Minster, about where state-owned firms keep their money. In a rare breakthrough, they received the information. There are select ministries and municipalities willing to assist journalists and the media, the panelists said—Stephanov singled out the Interior Ministry and the Foreign Ministry for praise in this respect—but overall, they deemed last year's positive trend unsustainable.

Panelists consider the unrestricted access of outlets to international sources of news and information among the most consistently sustainable aspects of the Bulgarian media environment. Petrova confirmed, "The media are not limited in their access to local and international sources. And they are respectful of the rules." Panelists were also keen to note that use of other media's product falls within the accepted guidelines, and respect copyright laws.

The extremely liberal entry into the journalism profession is believed to even have negative consequences on the overall quality of journalism. Danov elaborated, "Access to the journalism profession is quite liberal. Anyone willing can be a journalist. This means there are casual visitors to the profession, as well as some business and political protégés. The most striking example is that of Elie Gigova. At one point, she was a soccer World Cup commentator at BNT, and later a morning show presenter and Nova TV.

OBJECTIVE 2: PROFESSIONAL JOURNALISM Bulgaria Objective Score: 1.88

The indicator measuring the fair, objective and well-sourced reporting sustained a modest decrease compared with last year's score—and has dropped more than half a point below the 2008 score. Panelists agree that the quality of journalism in Bulgaria is declining steadily. Generally, the regional outlets—especially print—fail to live up to accepted standards. To a great extent, this is due to limited access to training and insufficient knowledge of owners, editors and reporters.

Petya Mironova, from the Union of Bulgarian Journalists and the Journalism Ethics Committee, commented, "The worst thing is the low level of media literacy, the lack of journalism awareness. A large portion of local newspapers (regional, municipal) are still run by their long-time editors-in-chief, who are now also the owners. But they have not gained any new knowledge or acquired new skills. They do not know the standards. All of our efforts to promote journalism ethics and the new code were in vain; our voice was unheard. A local paper in Veliko Tarnovo is a good example. The editor-in-chief, in charge for over thirty years, says: "Right of reply? There's no such thing." Alexenia Dimitrova, special correspondent for 24 hours, said, "Sadly, Bulgarian journalism is way behind international standards. It is a crossbreed between tabloid and serious reporting. Events and issues are covered from a very narrow local angle—disregarding the universal criteria of balance, fairness and objectivity. Journalists are either unmotivated or unprepared; they have no access to continuous training. Last year I sat on the jury of the Local Media Awards and I was amazed by the extremely one-sided style of reporting."

Quite a few outlets have sufficient access to news and news sources, and their journalists follow the recognized professional standards. However, it is the intervention of the editors—motivated by the political or business affiliation of the outlet—that really brings down the quality of the reporting. Presenting the plurality and diversity of viewpoints in the coverage has yet to become the rule for the majority of Bulgarian media.

Georgiev agreed that traditional media are in decline, and added that new media do not follow professional standards. However, he said, "As a whole, a majority of reporters in the national media are sufficiently professional and keep to a set of standards that would be adequate across the EU. However, the professionalism of editors is based on a completely different set of criteria. In other words, what the media say is true—but it is not the whole picture." There are certain things that the media just will not talk about, depending on their political or business affiliations. There is no firewall between advertising and the newsroom; for example, nothing critical can be written about mobile phone companies—the biggest advertisers in the country.

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 and retain qualified personnel within the media profession.
- > Entertainment programming does not eclipse news and information programming.
- > Facilities and equipment for gathering, producing, and distributing news are modern and efficient.
- > Quality niche reporting and programming exist (investigative, economics/business, local, political).

Mihalev said that the majority of media outlets fail to present all sides of a story. Danov said that although he believes reporting is based on a variety of sources, official sources seem to prevail over voices from civil society. He also brought up a problem with national radio: Interviews often have questionable audio quality, making them virtually impossible to understand. Varying viewpoints are presented, but often air in different editions of the program—so depending when an audience tunes in, it can leave a one-sided impression. In Danov's view, television stations are meticulous and detailed in their daily coverage, but fail to provide answers to the important questions, often letting politicians hijack the interviews (e.g., *Otpechatatsi (Off-prints)* on bTV or *Na Chetiri ochi (Tête-à-tête)* on Nova TV).

Adherence to ethical standards is lacking, as well. Panelists criticized CEM, as well as the ethical commissions, for being too slow to address issues related to journalism ethics. The panelists noted that CEM failed to give an opinion on the protection of minors on television (specifically, children appearing on Big Brother)—it only issued a statement after the show was over.

As Danov said, ethical standards exist, but observing them is problematic. As a result, he noted, hybrid media formats thrive, leading to vulgarization and tabloidization of the media content. Self-regulation of the media sector is a formality rather than a conscious choice: commissions sit once or twice a year, and fail to address some of the most important issues—such as hate speech by politicians, and outspoken threats against the media and journalists (e.g., Volen Siderov and the Lufthansa incident),³ and vulgar and offensive language (e.g., MP Yane Yanev on his sexual orientation).

As a member of the broadcast ethics committee, Petrova commented that on paper, Bulgaria has adopted the right standards. But, as a member of the broadcast ethics committee, she said the committee deals mostly with petty complaints. "Yes, these things are important to the people involved, and it is part of the committee's job. But overall, our ethical standards feel quite low, including the big mainstream media."

Furthermore, quite a few major, popular media still have not adopted the existing ethical codes. This is a conscious choice on the part of their owners, and their decision is indicative of the values and level of responsibility in the Bulgarian media environment. Mihalev noted, "Big media groups Petya Mironova, from the Union of Bulgarian Journalists and the Journalism Ethics Committee, commented, "The worst thing is the low level of media literacy, the lack of journalism awareness. A large portion of local newspapers (regional, municipal) are still run by their long-time editors-in-chief... But they have not gained any new knowledge or acquired new skills."

owning multiple daily newspapers refuse to adopt the ethical code. The ethics committee has no authority over them, and they do not feel obliged to play by the rules. On the other hand, we have the ever-growing army of the sensationalist press. The tabloids just can't be bothered about ethical or professional standards. And their strength is in numbers: every one of them beats the aggregate circulation of all newspapers that have signed the code of ethics.

Another category of ethical complaints involve the professional behavior of journalists. In the midst of an economic crisis, job cuts affecting journalists, ever greater economic pressure and corporate dependency, the panelists believe under-the-table pay for journalists and editors continues to be an issue.

Self-censorship continues to poison the media environment, commented Danov. "The 'silence zones' are growing," said Mihalev, who linked the negative trend to the global economic crisis, which he said made the media a losing business. Unable to secure the funds they need, the media are particularly vulnerable to corporate and political pressure. Self-imposed censorship is also encouraged by the new political behavior (more aggressive, less tolerant, and disrespectful of public opinion) and the distinct style of dealing with the media of some of currently the most prominent politicians in Bulgaria.

Petrova expressed her opinion that self-censorship is making a frightening comeback, and noted that current affairs and investigative journalism are losing ground as a result. Journalistic investigations suffice with minor (and safer) issues or, even worse, are politically motivated.

Danov described one clear-cut cases of self-censorship, where journalists were reluctant to risk offending the prime minister: The notorious fund-raising soccer game in Pescara, Italy (a benefit match between Bulgarian MPs and cabinet

³The leader of the ultra nationalist party, Ataka Volen Siderov, was held by the authorities at Frankfurt airport for allegedly using aggressive language to the Lufthansa on-board staff. He then threatened to sue any media that claimed that he was arrested by the German police for the incident (and indeed, he was not.)

ministers and their Italian counterparts). All media covered the prime minister's goal scoring abilities but, reluctant to risk offending the prime minister, no one bothered to ask about the funds raised. For the record, tickets for the game cost ≤ 10 , attendance was less than 100.

Panelists also criticized the depth and quality of coverage of key events and issues. The media are exposed to pressure, and their editorial independence is undermined, which affects their decision-making on which topics to cover. For example, Mihalev was especially critical of journalists' avoidance of the corporate ties of the ruling party GERB. The situation is particularly complicated for small regional outlets, which have especially suffered from the economic crisis. To survive, they are more likely to favor the political or business agenda of a local lord over the interests of the community.

Danov also raised the question of blurring borders between journalism and publicity. "Journalists do cover key events and issues," he said. "The question, though, is how."

Although some events are covered by blogs, citizen reporters, or social networking tools, such reporting is not yet very influential on public opinion.

Pay levels for journalists continue to vary across different types of media: commercial and public, national and local. Pay levels for journalists are higher than for civil servants or teachers. Still, the panelists agree that pay is altogether low in the industry—with the obvious exception of some of the national-coverage broadcasters. This in turn favors an unhealthy environment: the relatively low living standard of journalists is a premise for questionable practices, as well as increased manpower mobility within the industry and outflow into other businesses. In a stagnant media environment and labor market, the journalistic profession seems to have little potential for growth and development.

Mihalev commented, "The crisis has led to job and salary cuts—journalists are no longer motivated to work to higher professional standards; instead, they are pushed instead into various forms of corruption. Or moonlighting: As Danov noted, "Even journalists from leading outlets work a second job. As to pay levels in local and regional media—they're simply laughable. No wonder then, at election time some of the senior journalists are handling PR for local politicians." Stephanov added, "Outside the capital city, our fellow journalists work for token pay. All that, along with the unstoppable march of entertainment, calls into question the professional standards in journalism."

Konstantin Markov, honorary chair of the Association of Bulgarian Broadcasters (ABBRO) concluded that the current state of the economy and the low pay levels do not favor the emergence and development of quality journalism in Bulgaria.

The surge in entertainment programming at the expense of news and current affairs is another serious, negative trend, according to the panelists. The line is increasingly blurred: issues and topics of public importance are addressed somewhat equally in entertainment programs and in news and current affairs shows. The issue of balance between news and entertainment is a matter of much debate. Media owners and managers unfailingly claim it is what the market wants, and they are simply responding to the audience demands. As Danov said, "Entertainment obviously dominates over serious content and it's a market-driven trend. It's what the audience wants in the end. Just take a look at the ratings."

Still, Kirkovska, noted that important social issues are overlooked in favor of entertainment programming; investigative journalism is growing thin. "Show prevails over in-depth analysis, and the agenda of the media is not the agenda of the audience," she remarked.

The level of technical equipment and facilities remains virtually unchanged—and this indicator is within reach of long-term sustainability. The big commercial broadcasters (and, to a certain extent, the public (formerly state) media have adequate, and up-to-date technical facilities. However, that is not the case everywhere. Danov explained, "Proper equipment is no issue for the big commercial outlets—and their workforce is skilled enough to use the new technology. At the Bulgarian National TV and Radio, things are a little more complicated. Digitalization is taking too long, upgrading the equipment is a long and complex procedure and the actual acquisition is often tainted by corruption allegations (BNT). However, it's the local media where the situation is most problematic. They're struggling to pay the wages, and upgrading the technology is not a priority.

There is little change to report in the level of niche reporting and investigative journalism in 2010. Niche reporting is developed in the big nationals, while local outlets lag behind, mostly due to lack of funding and qualified personnel. Mironova commented that both journalists and editors need more training in this area.

Investigative journalism is inevitably affected by the economic downturn and the resulting lack of funds for training, development and specialization in specific beats. But the surge in self-censorship has had a negative effect, as well evident in the protective bubble surrounding the prime minister. In addition, some panelists voiced doubts about the motives behind some of the investigations in the past year, fearing the media may have been used for political or business gain. Still, there are some notable exceptions of strong investigative reporting—such as the exposure of lucrative land deals by family members of several high magistrates, who were later forced to resign.

Danov agreed that beat reporting is sufficiently developed in national-coverage media, but said that this positive feature is stifled by self-censorship and the aggressive pressure exerted by people in power. Investigative journalism exists in big television stations, while in the press they're for the most part sensationalist or overtly partisan (tabloids like Shock, Weekend, Galleria). Investigative journalism remains a luxury for smaller outlets. Occasional pieces are more likely to be based on tips by insiders pushing their own agenda (the mailbox syndrome), rather than a consistent policy. Georgieva explained that in the mailbox syndrome, the outlet is a mere mailbox for planted evidence used in smear campaigns or in pursuit of political or corporate interests.

Ivan Mihalev commented that at his daily, the approach is shifting from niche reporting to team coverage (teams of reporters covering a single issue), and he believes this is the way the field is evolving.

OBJECTIVE 3: PLURALITY OF NEWS Bulgaria Objective Score: 2.66

Most panelists agreed that not only are there a growing number of news sources, but citizens also enjoy unrestricted access to print, broadcast, online and digital platforms. Petrova commented that sources of news and information are plentiful and the media succeed overall in adequately serving the public with information that's both diverse and reliable.

Still, some panelists remarked that quantity does not equal quality, and that the mainstream media actually fail to reflect profoundly diverse viewpoints on issues of great public importance. Alternative views and opinions are instead limited to smaller—even marginal—outlets. Panelists point out that it takes a higher level of public awareness and a more mature society for citizens to actually benefit from the existing media plurality in making informed decisions.

Danov agreed that news sources and platforms are plentiful, but noted that new media—including social networks—are available but only to a limited group of users. He added, "The reach of the Internet is growing every year, and that is undeniably a positive thing. However, coverage is still very stereotyped and superficial."

Mihalev shared his opinion that there are too many news sources, and that in some cases diversity is in fact to the audience's detriment. Radio waves, he emphasized, are overcrowded—the advertising market is too small to support all of the stations. "They are struggling to survive, and their editorial independence is in question." It is pretty much the same situation on the newspaper market—more than 10 national dailies is a disproportionate number for a small nation like Bulgaria. An outlet can be a losing business but still stay afloat by trading with influence. They're not market players—they're a tool of influence.

Kavrakova and Indzhev contemplated what the array of choices means for youth, in particular. Kavrakova said, "Viewers need to have a critical mind, an understanding of what and how many sources they need. This is a delicate balance—particularly for the young generation." Indzhev remarked, "Let's admit that most youths do not look for different opinions—they just watch television. Whether what they watch reflects a variety of views is an entirely different story."

Citizens' access to international and local media is free and unrestricted—and this is one of the stable trends over time. Once again, the panelists based their favorable assessment on the ever-growing Internet access, and the wide reach of cable television—two platforms that secure citizens' access to a great number of domestic and foreign sources of news and information. The only restriction to the use of international media is the language barrier, which affects mostly the older segments of the population. Danov commented, "People are free to use media and information, and the opportunities to obtain foreign news are unlimited. The

MULTIPLE NEWS SOURCES PROVIDE CITIZENS WITH RELIABLE, OBJECTIVE NEWS.

PLURALITY OF NEWS SOURCES INDICATORS:

- > Plurality of public and private news sources (e.g., print, broadcast, internet, mobile) exists and offer multiple viewpoints.
- > Citizens' access to domestic or international media is not restricted by law, economics, or other means.
- > State or public media reflect the views of the political spectrum, are non-partisan, and serve the public interest.
- Independent news agencies gather and distribute news for media outlets.
- > Private media produce their own news.
- Transparency of media ownership allows consumers to judge the 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.
- > The media provide news coverage and information about local, national, and international issues.

reach of cable is a curious phenomenon in Bulgaria—over 80 percent of households are subscribers." He also underlined declining literacy levels as one explanation for the deepening tabloidization of the Bulgarian media.

Most of the panelists believe the public television and radio, BNT and BNR, objectively cover an array of social issues and developments. They address problems of public importance, and produce quality public interest content. Both media outlets have multiple hours of "social" programming, so they cover almost everything. Disadvantaged people, children and the elderly are the most frequent social issues explored in public media. Georgieva noted that the public media might have taken a much worse turn in this respect, and she feels they are doing quite well: "Public broadcasters will say things every now and then that commercial outlets will never day to say," she said. Still, some panelists offered criticism, claiming the two public broadcasters have not lived up to their public service obligations and failed to offer quality coverage of issues of public interest, such as the management and absorption of EU funds.

Danov pointed out that BNT and BNR are continuing their transition from state-owned to public media. As Stephanov put it, "State media are not wholeheartedly committed to genuinely becoming public, but they're contributing to the development of journalism nonetheless."

According to Danov, political leanings do not show—let alone affect—the work of presenters. However, he said, "A degree of bias exists in some media in favor of the ruling majority (*Standard*, *Monitor*, BNT)."

Panelists acknowledge the contribution of the independent news agencies; over the last few years an evolving market has made room for some private news agencies that widen the diversity of sources. These include BGNES—an alternative news agency; and DNES.BG and vesti.bg—alternative independent news portals. The problems noted by panelists are mostly related to unclear ownership and insufficient independence from political and business influence. According to Danov, Bulgaria has independent and editorially sound independent news agencies which do a professional job of gathering and distributing news. The Focus agency is a particularly popular choice among regional outlets, as its service is free of charge. He added that some of the popular online sources (news agencies and blogs) are sometimes lacking in quality.

Most of the independent broadcasters produce their own news and this is a sufficiently stable component of the media environment. Big broadcasters with national coverage continue to improve and develop their newscasts. On the other hand, regional media are able to stay afloat by serving their niche with local news content. Vesselin Vassilev, owner of Radio Sevlievo, commented, "Local news—and regional news—is our corner on the market. There's demand for that and we're serving our audience."

As for online media, the share of websites producing their own news content is relatively low. But panelists believe this to be one of the developing features of the media environment with potential for growth.

As diagnosed by previous MSI panels, the transparency of media ownership continues to pose obstacles to the development of the Bulgarian media environment. The lowest-scoring indicator of Objective 3, it dropped from the 2009 level, as well.

Danov commented, "Media ownership is not entirely transparent. The general audience is ignorant of who's who in the media—and the blogosphere is no exception. Media ownership can be concentrated (as seen with Iren Krusteva, who owns *Monitor*, *Telegraph*, *Politika*, BBT TV, and others) and shrouded in mystery. In such instances, a meddling owner is the rule rather than an exception.

Panelists identified two key developments in 2010 that characterize the controversial media sector policies of the new ruling majority. A clearly positive step is a piece of legislation (amendments to the Compulsory Deposition of Printed and Other Publications Act) that favors the disclosure of print media ownership. Opinions are split on another legislative decision: by virtue of recent amendments to the Radio and Television Act, it is no longer illegal for the same entity to own a media outlet and an advertising agency. The country still lacks a public register of broadcast media owners.

It is not unheard of for individuals or legal entities that own media outlets to meddle with editorial content and decision making. On the other hand, Bulgarian media continue to attract foreign investment (the leading independent television channel changed owners in 2010), which gives a boost to both content quality and editorial independence. According to the panelists, foreign investment is quite prominent, and it helps the general environment by favoring clear rules, better pay and protection against external pressure.

Panelists continue to express concern over the lack of depth in covering minorities, gender and other social issues, although this year's panelists are divided in their assessment and the overall score for this indicator changed little from last year. Some panelists see a wider range of topics and issues gaining prominence on the media's agenda. Others find the coverage piecemeal, superficial and stereotypical. Dimitrova commented, "To me, political stories have priority, 90 percent of the coverage is politics and big business... The fact that a gay pride event gets mentioned briefly does not necessarily mean pluralistic coverage."

According to Danov, it is not just a question of what the media supplies, it is also a question of audience demand for coverage of minority issues (LGBT, ethnic and religious minorities). Sometimes the coverage is skewed towards sensationalism, and issues are not addressed in depth, he said. He added, "The Otechestven Front (Fatherland Front) program on Nova TV is an interesting phenomenon in that it's trying to place focus on the real issues of various minorities, but often does so in vocabulary and style that defy good taste. Minority coverage is often reactive rather than proactive: based on a calendar of repeating or planned events, rather than a policy of consistent in-depth coverage of issues."

The panelists said that coverage of international stories seems to lack depth and substance recently—with some exceptions in the public media. The media claim the audience's interest lies elsewhere. Major commercial broadcasters are trying to strike a balance between domestic and international stories, but sometimes focus on topics that are terribly relevant to the Bulgarian society. Indzhev commented that some international topics appear to be avoided deliberately, such as the lack of locally produced covered of the Russo-Georgian conflict in Bulgaria. Kavrakova added, "There are other stories that get the same treatment—such as Turkey's EU accession... There's no public debate on this topic, no analysis of the pros and cons, no way to make an informed opinion."

Danov believes that Bulgarian media offer local, national, and international news, and he remarked, "That is where local outlets count—they will always provide the local angle." Commenting on his region, Sevlievo, Vassilev said, "In recent years, in our community there's been a decline in the demand for international—and even national—news. People care about local stories—the rest is less relevant."

OBJECTIVE 4: BUSINESS MANAGEMENT Bulgaria Objective Score: 2.13

Scores for Objective 4 sustained a moderate decrease compared with last year's score. Panelists agree that there is a genuine tendency to base media management on market principles, but said the environment is not conducive to applying good business practices on a wider scale.

Bigger outlets are well managed from a business perspective—especially the national coverage broadcasters. Markov noted that wherever foreign capital is involved, success is more likely. Danov added that many independent print and broadcast media are efficient and profit-making enterprises. Panelists voiced concerns, however, that planning and allocation of funding in the public radio and television are not efficient enough. As for small regional outlets, Danov commented, "Strategic planning is altogether absent; they live one day at a time. Journalists are not paid regularly, and they often work for minimum wage or untaxed cash payments." Poorly compensated, these journalists have little motivation, and this is reflected in the quality of their work.

Print media and regional outlets are particularly hard-pressed to secure a regular flow of funding, which upsets their long-term planning and strategic development. The situation is amplified by the ongoing financial crisis and the general trend of decreasing sales in the print media. Furthermore, attempts by online media to adopt sustainable business models meet with little success.

In its various shapes, advertising is the only source of revenue for most of the commercial media. For the majority of publications, subscriptions and sales of copies do not constitute a big enough source of revenue—advertising is the primary means of sustenance. Mihalev explained, "Media are at the mercy of advertisers and direct funding from owners. The quality papers are the worst affected—with dwindling circulation and less revenue from advertising or classified ads. Most newspapers are losing money and are de facto funded by the publishers. Publishers, in turn, are pressed by politicians." Stephanov concluded that the media, especially print, are in effect run by the advertisers—and this is killing good, objective, non-partisan journalism. Some of the tabloids are the obvious exception: their massive circulation is a viable source of income, which is also a boost

MEDIA ARE WELL-MANAGED ENTERPRISES, ALLOWING EDITORIAL INDEPENDENCE.

BUSINESS MANAGEMENT INDICATORS:

- > Media outlets operate as efficient and self-sustaining enterprises.
- > 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.
- Government subsidies and advertising are distributed fairly, governed by law, and neither subvert editorial independence nor distort the market.
- > Market research is used to formulate strategic plans, enhance advertising revenue, and tailor the product to the needs and interests of the audience.
- > Broadcast ratings, circulation figures, and internet statistics are reliably and independently produced.

for their editorial independence. Indzhev noted, "Circulation is something for the tabloids alone to take advantage of. And it so happens that they have greater independence, as they are paid by the readers, not advertisers." Georgiev added that this is really a global phenomenon; he said, "Maybe the smaller Bulgarian market is making it more prominent but it's happening all over the world. The only newspapers that profit from circulation are the tabloids."

Given the pivotal role of advertising in the prevailing business model of media funding, most of the panelists believe the editorial independence and the professional integrity of journalists are under substantial pressure. In public radio and television, the importance of state funding is believed to create conditions that favor political interference. According to Danov, "The media funded from the state budget are obviously in a state of dependence on the parliamentary majority."

The advertising market continues to evolve, but some of the negative effects on the overall sustainability of the media environment have not been overcome. There are signs of recovery from the slump in previous years, and some new legislation. Recent amendments to the Radio and Television Act lifted the restriction on simultaneously owning media outlets and advertising agencies. Some consider this a positive step: the restriction was not strictly enforced anyway, and it is a way for the industry to come clean on ownership. Krassimir Guergov is a specific example: he has admitted to holding a stake in bTV parallel to owning shares in advertising agencies.

The legislative amendments can change how the media do business; it is now legal for outlets to have their own companies selling airtime. Following the passing of the amended law, MTG registered such a company, and it is also handling sales for the Discovery group of channels.

Panelists attribute a worsened advertising environment to concentration in the advertising market. Georgieva said that the media operate on a distorted advertising market, dominated by a single owner of multiple agencies who also has stakes in certain outlets. The editorial content of the media—especially print—is increasingly dependent on the advertisers' agenda. Georgiev added, "The advertising market is shrinking and becoming concentrated—and doing so in a non-transparent way, in defiance of market rules."

Big advertising agencies are increasingly likely to concentrate all spending on national coverage outlets, as well undermining the sustainability and often the very market survival of regional media. Vassilev remarked, "In the last few years, advertising agencies have become complacent. They used to be proactive in their relations with local outlets, cable channels, but in the last three or four years they have grown lazy: they do not bother work with local outlets. There is no data about small markets."

Danov agreed that big advertisers continue to ignore smaller outlets—paying for advertising is based on clientelism rather than market values. The biggest advertisers are telecoms and banks. The panelists did agree that advertising agencies are highly professional, and adhere to international standards of production: advertising clips are professionally produced, and placed professionally, using marketing research.

Another cause for the drop in rating compared to last year's MSI survey is the trend of increasing advertising-related content in the media, both broadcast and print. In television, full use of the prescribed limit of advertising time is a legitimate goal to secure revenue in times of crisis, but also limit the expenses for actual content. The adoption of new forms of advertising—such as product placement is approaching the levels typical of developed markets. Kirkovska said that too much of the media content is being commercialized. Danov noted, "Commercial media's pursuit of as much advertising as possible is only natural. That's especially prominent in the print media, for which revenue from subscriptions is not an option really-it cannot compare with advertising income. In big national broadcasters, advertising often takes away from the actual newsworthy content... It seems the lifted restriction over advertising in news and current affairs programming has not resulted in greater freedom and variety but rather excessive commercialization."

In terms of the volume of advertising, Danov said, "The advertising market is evolving and the big nationals are playing by the market rules. The volume of advertising is limited to six minutes per hour for the public radio and TV, and 12 minutes for the commercial outlets. It's an entirely different story that neither the BNT, nor the BNR are capable of making good use of the advertising time they're allowed."

Petrova shared her own experience with ads taking over content: "I host a one-hour show. There used to be a clear pattern whereby at the start of each year when new contracts were still being negotiated I used to have more time to fill with content. Recently though, I only have 45 or 46 minutes and that's that. They wouldn't let me have a second more. The content of my program is inevitably affected." Georgiev concluded, "Outlets are offering discounts just so they sell out their commercial time—that means less program time to worry about. The idea is to get as much commercials as they can—and have less time to fill with content."

Most of the panelists agree that state and municipal advertising and publicity funds, or funding under various projects, is not fairly distributed across participating outlets. The government—both state and local—is likely to use them to leverage influence and shape the media's agenda. In addition, there are outlets that seek to earn the government's favor by adjusting their editorial policy towards more sympathetic coverage and friendly commentary. Georgieva summed up the concerns: "State funding, including distribution of EU funds, is consistently non-transparent. They're feared to be an instrument of bribing the media."

For his part, Danov offered a slightly more nuanced view, "I don't think the government is using budgets and funding as a pressure tool—at least not directly. Buying air time is handled by advertising agencies—at least for the big outlets. As to favoring certain media, I have the feeling it's the outlets themselves that proactively seek the government's approval, not vice versa. In way, there's an element of self-censorship in all this."

Regarding the use of market research, due to the continuing economic crisis, marketing research was less and by fewer outlets in the past year—a trend that is especially prominent in the print media. However, leading outlets—especially television channels—continue to base their strategic planning and decision-making on market research. Danov said, "In big commercial media, especially television, market research is key to the strategic planning. This is certainly true for major independent productions where ratings are of utmost importance." Several companies, including some major international companies—Gallup International, TNS, TVPIan and local—like Alpha Research, MBMD and others, offer market research surveys in Bulgaria.

However, the panelists noted that smaller outlets lack the financial resources to afford proper audience research, which in turn is causing them to lose their competitive edge. Vassilev added, "It turns out that research simply ignores smaller communities with population of less than 50,000. There used to be market data for these areas; we used to have an idea of how they are doing. We were required by CEM to submit this kind of data. Today we're in the dark."

The majority of panelists continue to express doubts about the official ratings and circulation figures. Danov said that producers frequently question the publisher's ratings, especially when they're not in their favor. Miranova, for her part, said she is skeptical of the reliability of independent agencies producing ratings and circulation figures. In 2010, despite the existence of two People Meter systems, only one was supplying the bulk of media outlets, advertising agencies and media shops with data. The agency in question is alleged to have ties with some advertising agencies and media.

For more than 10 years, there used to be a single source of broadcast ratings in Bulgaria, the TNS TV Plan People Meter

system. The media have repeatedly questioned the credibility of the data. Doubts were expressed that intentionally pumped-up ratings of certain outlets were distorting the market—amid speculation that a prominent stakeholder in the media and advertising market (Krassimir Guergov, who recently admitted that he used to own shares in the country's biggest TV Channel, bTV) was involved in the ownership of the rating agency.

About four years ago, the market research company GfK set up an alternative People Meter system, the GARB system, to compete with the TNS panel. After a brief spell of success and having attracted a major client in the face of Nova TV, the country's second biggest television channel—GARB failed to achieve prominence. Advertising agencies continued to predominantly use TNS figures, which caused GARB to lose most of its subscribers.

Many experts have questioned the capacity of the Bulgarian market to sustain two competing People Meter systems. However, media stakeholders have also repeatedly called for tighter control over the methodology and the integrity of the data produced by TNS. A committee of subscribers initiated an independent audit by an international company, which found no major deficiency in the system. Yet, at the end of 2010 (a few weeks after the MSI panel was actually held), GARB officially announced the acquisition of the TNS TV Plan People Meter system. Effectively, this will preserve the present status quo of a single, competition-free source of broadcast ratings.

OBJECTIVE 5: SUPPORTING INSTITUTIONS Bulgaria Objective Score: 2.22

Trade associations exist and represent the interest of publishers and outlet owners. This year's scores dropped, however, based on the doubts expressed by some panelists about the level of political independence of trade associations. In addition, there's a history of rivalry between associations as well as internal bickering between competing members, which also contributed the lower scores.

Danov observed that the authority of the active trade associations—the publishers' union, the association of cable operators, ABBRO, etc., seems to be decreasing. "They have contributed to no substantial change in the media environment—and changes have occurred not because of, but despite their efforts." Danov added, "Often the associations have legitimacy issues—their heads are elected through vague procedures and their work remains of marginal interest to society." Vassilev said that associations such as ABBRO are defending the professional interests of their members, but he wishes that they offered more in the way of training programs.

The majority of experts believe that the Bulgarian media environment suffers from a shortage of efficient and committed associations of media professionals. The existing institutions are failing to defend journalists' rights or promote professional standards. The overall conclusion is that a long downward trend has settled into a status quo. On the one hand, Danov said that professional associations benefit from a liberal registration procedure, and no government pressure. On the other hand, he said, "However, I see no merits in their existence, at least over the past year. It was the media and not the associations that responded to the prime minister's letter about political pressure. The associations have failed to stir debate on the amendments to the Radio and Television Act. They failed to adequately respond to the removal off the air of leading journalists like Lora Krumova and Milen Tsvetkov, or the appointment of Dimitar Tsonev as host of the BNT Sunday afternoon show despite the clear conflict of interests constituted by his position on the BNT board."

As for NGOs supporting the media, The Bulgarian Helsinki Committee and the Access to Information Program are the two most prominent NGOs supporting the freedom of speech and the independence of media. Overall, however, panelists felt that NGOs now have less impact than they once did. This is mostly attributed to the decreasing role of civil society organizations in the development of the media environment. Some of their actions have even been interpreted as attempts

SUPPORTING INSTITUTIONS FUNCTION IN THE PROFESSIONAL INTERESTS OF INDEPENDENT MEDIA.

SUPPORTING INSTITUTIONS INDICATORS:

- Trade associations represent the interests of media owners and managers and provide member services.
- Professional associations work to protect journalists' rights and promote quality journalism.
- > NGOs support free speech and independent media.
- Quality journalism degree programs exist providing substantial practical experience.
- Short-term training and in-service training institutions and programs allow journalists to upgrade skills or acquire new skills.
- Sources of media equipment, newsprint, and printing facilities are apolitical, not monopolized, and not restricted.
- Channels of media distribution (e.g., kiosks, transmitters, cable, internet, mobile) are apolitical, not monopolized, and not restricted.
- Information and communication technology infrastructure sufficiently meets the needs of media and citizens.

to restrict the freedom of speech. Gregoriev explained, "NGOs petitioned the parliament to actually censor a television program. A group of NGOs asked the regulators to take *Big Brother* off the air even before the start of the show. There was civil pressure in favor of imposing censorship in Bulgaria, because they were afraid that the program might violate children's rights."

Danov agreed that NGOs in the media sector have clearly stepped back from their traditional roles. He said, "They could not possibly think that their mission is accomplished, that they are no longer needed. The potential of NGOs was severely limited by the withdrawal of foreign donors, the slow and obscure procedures related to project funding, the delayed payments for completed projects, the poor administration of government-managed EU funding programs such as Human Resource Development and, above all, Administrative Capacity. As a result, organizations like the Media Development Center and the Center for Independent Journalism saw their activities limited.

Two of the indicators, reflecting the quality of journalism education and professional training, received lower scores. Academic programs fail to keep up with the quickly evolving new technologies and the demand for practical hands-on training. Due to financial constraints, media are less willing to fund short-term training programs for their staff. In addition, there are almost no foreign organizations to support the process. Thus, training remains largely a question of personal motivation and opportunity. The general conclusion is that the shortcomings of academic education and professional training have a negative impact on the quality of media coverage.

Danov said that academic journalism programs are still lagging behind the needs of the media industry—and due to rapidly developing technologies, the divide is growing more pronounced than ever. Due to a chronic lack of funding, the technical facilities at the universities are out of date, and academic programs are theoretical rather than practical. He concluded, "As a result, journalism graduates are not capable of taking up jobs in the media straight from the bench, they need special training." Miranova commented that fresh graduates have trouble finding full-time appointments; at best, they might secure short-term internships. Gregoriev said that only the American University in Bulgaria has an adequate journalism program.

Danov noted that the number of organizations offering specialized training is decreasing, as well, both due to economic and strategic reasons. He said, "On one hand, the economic downturn has severely limited funding for professional development. Moreover, some of this funding is set aside or used for different purposes. On the other hand, international organizations, which up until about four or five years ago offered training, are no longer present on the local market. As a result, the professional development of journalists is stagnating and the quality of programming inevitably suffers."

Dimitrova underscored the huge need for mid-career training, especially in local media. She also pointed out the vital importance of foreign language training for journalists (especially English) in local media.

Access to equipment, newsprint and facilities is non-restricted and market-driven, although there is a degree of concern about potential monopolization and shrinking investments in new production technologies. Some experts share similar fears regarding the distribution channels. The lower rating has been attributed to the attempts of a certain media group, New Bulgarian Media Group, which owns a television channel, some publications and a printing facility, to acquire media distribution companies. Mihalev expressed concern about this trend towards monopolization of the print distribution market; he also lamented the fact that distribution firms do not supply circulation and market information to the actual media.

Media are not constrained in their choice of equipment, domain registration, and IP addresses. The common opinion is that media infrastructure is developing rapidly and even outpacing the actual needs of the media and users. As a result, the rating of this indicator is relatively higher compared to the objective average. A major challenge to the development of the Bulgarian media environment, related to distribution, is the decision to delay the switch to digital television.

Danov elaborated, "Regardless of the advancement of the IT and communication infrastructure, the process of digitization is lagging behind and has been delayed until 2015. Some parallels were drawn with the UK, where the switch was also delayed, but no one cares to compare the degree of digitization of households in Bulgaria and the UK. CEM is nonchalant and public debate is virtually non-existent, outside very narrow professional circles."

Danov went on to describe the market of mobile services as extremely dynamic, but at the same time limited in terms of the number of actual users of the digital platforms. As for cable distribution, he said, "...it is of epic proportion in Bulgaria—I think cable has already covered over 80 percent of Bulgarian households in towns and villages alike. This high percentage is, and will be, an extra hold-up for digitization users will be reluctant to support the switch as it will only mean more expenses."

List of Panel Participants

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