The Tension Between Culture and Commerce

*A study of the Bulgarian public service broadcaster*

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Abstract

This thesis has sought to investigate how the Bulgarian public service broadcaster (BNT) negotiates the tension that exists between market imperatives and the public service vocation. With the triumphant rise of commerce and its overriding quest for profits, BNT found itself on uneasy perch. It was expected to fulfil its public service mission and at the same time manoeuvre in a commercial manner, pursuing advertising revenue and strenuously competing for audience. The breadth of analytical ambition called for a mixed methods approach to research, where a combination of document analysis, semi-structured interviews and quantitative content analysis was employed for the purpose. The study found a growing reliance on public service based conceptualisations, promoting diversity of programme content and distinctiveness of offerings. Although dragged into the competition battle, BNT provides a wide range of selection and choice to the large majority of citizens while catering also for the needs of marginal groups.
Acknowledgements

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I cannot repay you all!

Magdalena Valcheva
Oslo, December 23, 2011
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### Abbreviations and Acronyms

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<tbody>
<tr>
<td>AVMSD</td>
<td>Audiovisual Media Service Directive</td>
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<tr>
<td>BBC</td>
<td>British Broadcasting Corporation</td>
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<td>BCP</td>
<td>Bulgarian Communist Party</td>
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<td>BNR</td>
<td>Bulgarian National Radio</td>
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<td>BNT</td>
<td>Bulgarian National Television</td>
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<td>BR</td>
<td>Bulgarian Radio</td>
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<td>BT</td>
<td>Bulgarian Television</td>
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<tr>
<td>CEM</td>
<td>Council for Electronic Media</td>
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<td>CEM</td>
<td>Central European Media Enterprise</td>
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<tr>
<td>CRC</td>
<td>Communications Regulation Commission</td>
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<tr>
<td>EBU</td>
<td>European Broadcasting Union</td>
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<td>LRT</td>
<td>Law on Radio and Television</td>
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<tr>
<td>MTG</td>
<td>Modern Times Group</td>
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<tr>
<td>NRTC</td>
<td>National Radio and Television Council</td>
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<tr>
<td>PSB</td>
<td>Public Service Broadcasting</td>
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<tr>
<td>SAC</td>
<td>Supreme Administrative Court</td>
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<td>STC</td>
<td>State Telecommunications Committee</td>
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1. Introduction

In the state-monopoly era of television, the European broadcasting institutions were largely moulded under the influence of the British Broadcasting Corporation (BBC) philosophy. Considering the political, cultural and social heterogeneity in Europe, however, the prerequisites for implementing the British model of broadcasting differed strongly from country to country and era to era. It was primarily the advent of commercial television that metamorphosed the course of development and the dynamics of the broadcasting realm in Western Europe. The advancing competition challenged the bastion of public service broadcasting (PSB) and marked the beginning of the new television era, subjected to the laws of the market. The clash between the old media order and the demands imposed by the new context triggered the collapse of the public monopolies, giving way to what was termed, more or less aptly, dual broadcasting systems (Humphreys 1996).

Since the early 1980s, the new market-driven logic orchestrated an avalanche of changes in the audiovisual landscape, modifying its scope, organisation and nature. These turbulent circumstances, in turn, brought about serious implications for the heartland of public service broadcasting, threatening its financing, distinct mandate and ideological underpinnings. Faced with an avid competition and financial quandary, the ferocity of which was bound to intensify, in much of continental Europe, public stations succumbed to ‘The clear trend’ of rising recourse to advertising revenue as a supplement to meagre public funding (McKinsey & Co. 1993: 11). The prevalence of dual (mixed) funding has, today, become a permanent trait of the contemporary funding mode for public service institutions in Europe. Although it unfolded into a variety of combinations with different patterns and capacities from country to country, at one area is the conflict the same. Taking the plunge into the maelstrom of competition places double pressure on PSB. It is expected to fulfil its public service mission and at the same time manoeuvre in a commercial manner, pursuing profit and strenuously competing for audience.

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4 Dual funding cannot, however, be designated ‘double’ funding, a term often used by the detractors, for the reason that it does not refer to a situation where the same programmes or services are paid for twice (EBU 2000: 7).
This challenging state of affairs was, in many ways, more complex and much tougher for the post-Communist states, where the competition onslaught started on before public service broadcasters were truly established (Jakubowicz 2004: 65). Contrary to Western Europe that enjoyed a reputation of long-standing democratic tradition, in the transition societies of the Eastern European region, public service was a distant ideal rather than a working reality (Raboy 1997: 78). Such was the case with the Bulgarian National Television (BNT), the first television station established on the Balkan Peninsular that had for several decades danced to the pipe of the oppressive doctrine of the totalitarian regime. However, in the course of transition to civil society and market economy, amplified by the advancing competition, BNT found itself trapped in the throes of the tension between two conflicting camps—public service orthodoxy and the free market. With the rising number of commercial operators, followed by a plethora of cable and satellite channels, in the recent years the fight for audience and advertising revenue has become exceptionally ferocious. The absence of a robust public tradition, compounded by insufficient public funding and ensuing strong dependency on advertising lays the grounds for the confusion that now reigns about BNT, a confusion that has sharply increased the tension between commercialism and non-commercialism.

1.1 Research questions

With this preamble I wish to underline that this thesis does not seek to elucidate the transition from monopoly to competitive markets in the post-socialist Bulgaria, coinciding with the arrival of the new generation of broadcasting technologies. Neither does it address the conversion of state television into public service, although the transformation has been remarkably spectacular in this territory, shifting from a state-controlled broadcast system supplying national, regional, and greatly sieved Western programming to a deregulated, multiplatform, transnational system providing predominantly a foreign entertainment programme menu. The core objective of this thesis is directed at the uneasy marriage of ideological and economic considerations and the implications it has brought for the current state of the Bulgarian public service broadcaster. The thesis seeks, therefore, to explore:
Does the Bulgarian National Television manage to find equilibrium between commercial viability and the public interest?

The key research question revolves around the relationship and interaction between the market imperatives and the public service mission. While the former entails profit pursuits, the PSB vocation is captured in the social responsibility of bringing informational, cultural and social benefits to the wider society (McQuail 1992: 3). Serving the public interest is, hence, more than a mandate handed down by government or the legislative body. It is a self-imposed credo that informs programming policy. The study embraces BNT’s ongoing battle to survive in an utterly commercialised, fragmented, and highly competitive milieu, which is, further, expected to become even more challenging as a result of the upcoming digital switchover in 2015. To investigate how the Bulgarian public operator juggles between the two contradictory paradigms that shape its practices, I will look closer at the following sub-questions:

1) How is the dual funding articulated in the Bulgarian public service broadcaster?
2) Does BNT’s programme output reflect the distinctive programming ethos of PSB?

Both sub-questions will be examined in light of the regulatory framework that BNT operates in. While the former grapples with the financial prospects and economic pressures at hand, the latter concentrates on BNT’s programming domain. It explores BNT’s public service commitments and the structural diversity of its programme output by drawing parallels to two major commercial counterparts. Both aspects will be further drawn in a discussion that seeks to reveal whether the commercial activities of BNT has taken the upper hand compromising the authenticity of its mission, or whether BNT has retained its cultural (in the broadest sense) aspiration, offering strong resistance to commercialism.
1.2 The structural merging of public service and commercial channels

In the Western European research tradition the debate about PSB funding has been predominantly rooted in the tension between culture and commerce. Many scholars have concentrated on the noble ideals and societal functions that PSB is grounded in, set in relation to the potentialities and limitations of the multi-channel system (Siune & Truetzschler 1992; Hellman & Sauri 1994; Achille & Miége 1994; Steemers 2001; Padovani & Tracey 2003; Søndergaard 2006; de Bens 2007). Still firmly entrenched in conventional definitions on the programme purposes and the broader theory on the PSB’s role in the society, the discussion has increasingly revolved around the negative influence of the intense competitive milieu. This has prompted stern criticism of the growing share of mass appeal programming on public service channels, stressing on the detected ‘symptoms of ‘commercialisation’ and the tendencies towards ‘entertainment-like’ programming’ (Hellman & Sauri 1994: 48-49). Much of this criticism focuses particularly on the content convergence between public and commercial channels, as their programming profiles are gradually narrowing, becoming more and more alike (Siune & Hultén 1998: 29).

At present, the public service debate is dotted with similar statements, discussing the dominant tendency of ‘imitation’, ‘convergence’, ‘hybridisation’ (Biltereyst 2004), and other concepts illustrating the great menace that entertainment poses to the vulnerable values in public broadcasting (Blumler 1992a). Bearing in mind the implications of commercialisation, I wish to pursue the convergence hypothesis in the analysis of the Bulgarian public broadcaster. I take the stance that with the economic forces and pressing competition at play the ideal of pluralistic and varied programming is perilously enfeebled in the case of BNT. I posit, therefore, that advertising on public service television “(…) is arguably sheer poison with no known antidote” (Blumler 1993: 411), that has distanced BNT from the public service identity and its lofty aspirations for the well-being of society.

1.3 Public service broadcasting - a clarification

The search for one true meaning of the concept of public service broadcasting has proved rather challenging, as there is no standard, broadly approbated definition in the
field of media research (Syvertsen 1999; Søndergaard 1999; Rumphorst 2007). A myriad of scholars have been confronted with the intricate nature of PSB, which has begot various renditions on the concept. In countries that have had a tradition of state broadcasting and, especially in languages that lack a corresponding term to the word ‘public’, the confusion has been immense. In former socialist states, such circumstances constitute obstacles for a clear understanding of the real nature of PSB, which is anything but ‘state’, ‘government’ or ‘official’ broadcasting (Rumphorst 2007: 1).

All in all, the concept of public service broadcasting refers both to an institution or a broadcasting system in a country, and an ideology expressed in certain values and principles of programming. Broadly speaking, the term, initially, used to be characteristic of single institutions, when it was common to differentiate between public and private operators. Today, however, when this dividing line is blurred, the concept designates a national public service model, illustrating a market structure comprising of multiple television channels. The second meaning of the concept, in the narrow sense, refers to public service in terms of definite programming objectives. This understanding also constitutes the core of my account on the Bulgarian public broadcaster. The stance focuses specifically on certain programme types and categories, viewed as part of a compound and diverse programming practice intrinsic to public service.

1.4 Structure of the thesis

Chapter 2 of the study provides a historical overview of the Bulgarian National Television’s course of development, highlighting factors that have been influential to its current state of affairs. Chapter 3 presents academic perspectives that lay the theoretical fundament for the analysis. It discusses public service theory and the market theory perspective, drawing on their underlying principles that emphasise different impetuses for organisation and programming paradigms of broadcasting. Chapter 4 explains the methodological approach and the methods employed. It provides an account of the collection of empirical material and the approach to documents, interviews and programme schedules. Chapter 5 and Chapter 6 focus on the two confronting camps of interest. While the former studies the mixed funding of the Bulgarian public service broadcaster and sets out the funding mechanisms and
appropriation of financial resources, the latter analyses the programming philosophy of BNT reflected in its programming practices. In chapter 7 both aspects are brought into discussion aiming to locate BNT’s current position in relation to the market and its public service assignment.
2. The Media Landscape in Bulgaria: politics and modernity in perspective

Throughout the post-war period the Bulgarian broadcasting media evolved in a hilly political, legal, and cultural terrain of great distance from the rest of Europe. The legacies of the Communist times, the transition process, its accompanying deregulation, and the desperate power struggle between the old and the emerging political elites have been decisive in shaping the fate of public television in the country. This chapter, accordingly, provides a retrospective glance at the conditions that underlie the present state of the Bulgarian National Television, giving prominence to the relations between politics, economics and the national television broadcasting. The subsequent sections will highlight a whole historical era, reflecting on different phases in the pace of development of the Bulgarian broadcasting system: from its establishment and reorganisation, through media policy development, to its current situation confronted by complex challenges. The historical review is aimed at understanding puzzling features about the mass media in Bulgaria, and why the demise of communism represents a major challenge to the ways in which we think about media. In doing so, I am not concerned chiefly with the fall of the ‘communist’ view of the media, although that is discussed in passing, but rather with the impact of the dominant ‘Western’ principles of democracy, liberty and pluralism.

2.1 Communism and beyond: a study of changing patterns

The following section sheds light on some distinct features of the history of the Bulgarian television, going back to its first steps and to the roots of political upheaval after the fall of the Berlin Wall.

2.1.1 Television in the course of communism

As in every state of the Eastern Bloc, the press and the radio in Bulgaria were traditionally entrenched as the party mouthpieces after the socialist revolution in the country, and it was only in 1958-1959 that they were joined by television (Zankova 2005). The birth of the television in Bulgaria resembles the founding of any other broadcasting institution, “(…) it is accompanied with years of hard toil, and is a fruit
of joint efforts” ⁵ (Almanac 1999: 892). The first attempts at the introduction of television broadcasting started in the fifties of the last century as studio experiments in the attic of the Technical University of Sofia (Meltev 2007). Inspired by the international advancement in the broadcasting sphere, a team of enthusiasts started running pioneering television transmissions on the territory of the capital. Well aware of the far-reaching affect of the television programmes, the ruling Bulgarian Communist Party (BCP) adjudicated upon the building of a television tower that would enable the wide dissemination of television broadcasts. On December 26, 1959 in a solemn ceremony, the Bulgarian Television (BT) was officially founded ⁶, that was, nonetheless, the first television operator on the Balkan Peninsular (Almanac 1999; Halachev 2000).

In the phase of its “romantic juvenility”, BT went on an interesting journey: it experimented on the first TV magazine programmes, expanded the direct broadcasts, laid the foundations for the Bulgarian television cinema and so forth (Almanac 1999). The BCP, however, rigorously observed BT’s professional achievements as it sensed the menace of “(…) the new television dialog with the world” (ibid.: 895). As everywhere in the communist bloc, the ruling authorities held a tight rein on the journalists, and imposed a stringent ideological control on the programme content through widely practiced censorship. Communism, as a social structure and political ideology, illustrated the unique symbiosis of the Bulgarian state with the classless society, curtailing the rights and the liberties of the people. All media served as a powerful tool for controlling information, viewing even marginal groups of oppositional intellectuals as a potential threat to the underlying philosophy of the communist power (Splichal 1994; Sparks & Reading 1998). As everywhere in the Communist Bloc, Bulgaria developed a monopolistic, state-owned media system under Party control, “(…) with instrumentalised journalists and passive recipients as targets for one-way flow of one-sided propaganda”(Kleinwachter 1995: 3).

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⁵ In this section, I have translated Bulgarian speech into English. These translations should, however, not be seen as official. Rather, they are meant to yield a basic understanding of the subject matter of the texts in question.

⁶ The date that signifies the inception of the television broadcasting in Bulgaria has been a debatable issue through the years, as there were regular transmissions on an experimental level from 1954 and on a professional scale from 1959. Besides, in France, the historians faced a similar problem: experimental broadcasts started in 1931, orchestrated by Ecole Supérieure d’Electricité. The year 1935, however, is inscribed in the historical documents of France as the beginning of the broadcasting. Hence, the international practice enjoins that transmissions on institutional level have preponderance over those on experimental one (Mihailov 2004).
of speech was limited, and the people swam in an informational haze. With the years, however, the Bulgarian Television evolved into the most developed and popular medium in the country. This period of maturity brought along the introduction of colour television, the launch of the second channel of BT in 1975, along with the establishment of four regional television centres driven for the decentralisation of culture and a faster coverage of the events occurring in the countryside (Ivanova 2005). BT became large-scale, hierarchically organised, bureaucratic establishment in which there were complex procedures for ensuring acquiescence to the will of the directorate.

2.1.2 The wind of change

The 1980s marked the beginning of glasnost and perestroika in the country, two major catalysts whose effects led to crucial changes in Soviet society, and profoundly influenced the world balance of power and the East-West relations. The stranglehold of the state over broadcasting in Bulgaria came to an end in the early 1990s, triggered by the collapse of the communist regimes in Central and Eastern Europe. The events of the autumn and winter of 1989 were greeted with enthusiasm and a sense of joy at the long-awaited liberation from “(...) the suffocating paralysis that had gripped half a continent for half a century” (Sparks & Readings 1998: 1). The fall of the Berlin Wall aroused hopes as “(...) the strongest of strong states, the most totalitarian of political systems, the most ruthlessly repressive of dictatorships” has proved to be vulnerable (ibid.: 2). The collapse of the old order opened up for the opportunity to construct a different and better society. There has, however, been a sharp division of opinion regarding the nature of communist societies. For all communist proponents, the communist states did constitute new and essentially democratic societies that delineated the road to a better future of humanity in general (Sparks & Readings 1998: 12). The alternative view, held by most of the right and some of the left, stressed the oppressive nature of these regimes, characterised by a centralised command economy, political power concentrated in the hands of the ruling Communist Party, social life regimented and subordinated to the line of the party leadership (ibid.: 12, 80).

In tune with the transition towards liberalism and democratic vitality, the reform on the media system was guided by the desire of total negation of the old
system. The visionary idea was deeply rooted in the classical Western philosophy, inspired by the ideas of freedom of expression, human rights, the British ideal of public service broadcasting. The totalitarian model of regulation and control was to be replaced with a liberally oriented one. The former communist states were to proceed towards the kind of market capitalism and democracy embodied in the idealised Western European model they looked up to.

The reforms of the Bulgarian media system began within the general context of the democratic reconstruction of the country. After the first multi-party elections held in the summer of 1990, the Main Principles for the provisional statutes of the Bulgarian Television and the Bulgaria Radio (BR) were adopted (Halachev 2000). The two media were renamed, respectively, Bulgarian National Television (BNT) and Bulgarian National Radio (BNR), and proclaimed autonomous institutions (Meltev 2007). This legal shift was, however, not sufficient to delineate the structure and functions of the new democratic media system. In July 1991, the National Assembly adopted the new Constitution of Bulgaria that was the first Constitution of a Western type in the former Eastern Bloc countries (Petev & Raycheva 2000: 7). The new constitution guaranteed the right to seek, obtain, and disseminate information; the right to express and publicise opinions, as well as the relevant rights for media freedom (Kleinwachter 1995: 6). The ratification of the European Convention on Human Rights and the adoption of the Bulgarian constitution gave real legal backing to the complex processes in all domains of the state.

2.1.3 A tortuous reform: BNT at the centre of the political storm

In contrast to the turbulent and emphatic transformations in the press, changes in the electronic media were slower, incomplete and lacked general consistency. Since the very beginning of the reform, the Bulgarian National Television became a subject of a growing political power struggle. Contrary to the democratic expectations, the shifting governments were increasingly succumbing to the temptation to retain or reassert control over the former state broadcaster, thus jeopardising its independence. In sum, in the first five years of the restructuring, governments had changed five times; parliamentary elections were held three times, and BNT’s Director General was changed on six occasions (including several times when BNT did not have officially appointed one) (Iordanova 1995: 21-23). A new practice was thus generated
- each new prime minister discharged the old Director General of BNT and appointed, respectively, a new one, more favourable to the governmental policies (Kleinwachter 1995; Splichal 1994; Zankova 2005). In 1993 even the head of the Committee on Posts and Telecommunications, who ventured to start the whole process of licensing private radio and television stations, was accused of disloyal conduct and dismissed by the government. In many respects, the post-communist transition was just marking time, progressing from one state to approximately the same, but garnished with a democratic make-up (Almanac 1999: 902).

Although the ideologically quilted mission of the electronic media de facto was abrogated and the control mechanism for its performance obviated, a clearly expressed agreement regarding the formula and the ratification of a new public broadcasting mission was, however, still lacking (Tscholakov 2000b). The repudiation of the communist control levers of power over media did not necessarily mean that media automatically became autonomous and democratised. With ownership preserving de facto its state character, the Bulgarian National Television was unable to detach from the apron strings of the state. Its main source of funding was still coming from the public purse in the form of a direct subvention from the government, supplemented by a small portion of advertising revenue. The financial dependency of the broadcasting station was further interlocked with a mechanism of government influence as the Parliamentary Commission of Radio and Television, representing the National Assembly, observed and controlled all activities of the national media.

The mission of creating pluralistic and democratic broadcast media, independent from the government, where the audience actively participates with a broad diversity of voices in a public debate, was nowhere to be seen. The implementation of Sir Reith’s ideal of public service broadcasting, that has been successfully adopted in various Western European states, was “too far from reality” (Iordanova 1995: 21). The Bulgarian National Television was not aware of its major

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7 Iordanova (1995), on the other hand, states that changes of government did not automatically lead to changing the leadership of TV, but each new government exercised pressure on the Parliamentary Commission to make sure that they appointed a Director General a loyal person, who would introduce further personnel changes down the hierarchy.

8 The Commission, consisting of eight deputies and seven prominent intellectuals, had a core role in all spheres of the radio and television- their programming policy, organisation, financing and so forth.
role in the public transition and how far its actual rights and responsibilities stretched out. In contrast to the communist regime when television operated in accordance with stringent rules, in the post-communist period rules of whatever nature were missing. Hence, as “the political winds were blowing in different directions”, the BNT was inevitably at the epicentre of the political storm (Almanac 1999: 902).

2.2 From State to Public Service Television: legal steps and regulatory arrangements

2.2.1 Media legislation as instrument to democratisation

Aimed at institutionalising the democratic process in the country, the introduction of domestic media laws was regarded necessary as part of the new legislation (Zankova 2005: 5). The governments, however, showed reluctance to commit to firm media legislation, since it would mean irreversible loss of the control they exercised over the national broadcast space (Antonova 2004). It is, therefore, not surprising that the first years of transition were marked by struggles over the control of state television, while issues of radio and television legislation remained secondary or nonexistent. In 1993 even the then president Zhelyu Zhelev expressed concern and pleaded for some governmental actions, as “it was intolerable to keep the national television hostage to political games and ambitions” (BBC Summary of World Broadcasts 1993, quoted in Iordanova 1995: 20). It seemed that democratisation in Bulgaria was put on hold. In almost a decade of political stand-offs, “a vibrant, unregulated, often amateurish television culture” started developing (Open Society Institute 2005: 346). A great number of unlicensed cable television stations came forth, while the politicians were wrestling for control over the national broadcaster. The immense proliferation of illegal cable channels reached a point where the capital, Sofia, had an estimated three hundred separate local companies (ibid.: 346).

With the responsibilities given to the Parliamentary Commission, it turned into a legislative, executive and controlling authority (Ts cholakov 2000).

In this period of regulatory vacuum, BNT was undergoing structural changes. Among them is the establishment, in 1992, of the competing Channel 1 and Efir 2 within the BNT. This was considered as the first step in testing alternative approaches towards the further restructuring of television, where Channel 1 was to respond to the needs of the government, while Efir 2 was to gradually become a share holding enterprise (Iordanova 1995).
The decision that was adopted providing for the main principles of the temporary statutes of the national media broadcasters, was not a law but an individual act of parliament having palliative regulatory function. It was designed to be effective for no more than several months, until a media law one day should be passed (Halachev 2000; Tscholakov 2000b). As is usually the case, it remained for more than five years. Bulgaria passed a Broadcasting Act in 1996, one of the last countries of the former Eastern Bloc to do so (Tscholakov 2000a). Met with serious criticism and objections, the law was declared unconstitutional in several respects by the Constitutional Court, and, thereby effectively rescinded (Tabakova 2004; Spassov 2008). After several faltering attempts, the Law on Radio and Television (LRT) was at last enacted in 1998. Designed to guarantee pluralism and to prevent external intervention in the electronic media, the LRT formed the basis of the legislative framework that has facilitated the liberalisation of the media market in Bulgaria. Recognising BNT’s important role in the civil society, the LRT legitimises BNT as an institution of vital importance to democracy and social coherence, and a stimulus to higher standards of programming. Since its adoption, the law has been amended 28 times, at one point twice within a week in December 2006.

2.2.2 Licensing procedures

The regulatory framework introduced in 1998 defined two types of broadcasting licences as compulsory for all the operators in Bulgaria: a programme licence for the realisation of radio and television activity, and a telecommunications licence for telecommunications activity. The established two-tier licensing system initially depended on the National Radio and Television Council (NRTC) for granting and monitoring programme licence and the State Telecommunications Committee (STC) for issuing telecommunications licences. Although it was possible for a candidate to apply for only one of the types, in practice, applicants always went for both (Open Society Institute 2005). Having a programme licence would grant the licensee permission to make a specific programme, but not to transmit it. Once an applicant had received a programme licence from the NRTC, the final decision was in the hands of the Council of Ministers to deliberate on whether the candidate could transmit the programme, while the Prime Minister would appoint a commission to carry out the procedure for granting a telecommunications licence (ibid.: 362). There was a lack of
transparency in the decision-making process, and the licensing process was alleged highly politicised.

To avoid such political influence, amendments to the Law on Radio and Television and the Telecommunications Law were passed in 2001. The amendments brought significant changes, introducing two different regimes, for terrestrial broadcasters and cable/satellite broadcasters. The newly formed Council for Electronic Media (CEM) replaced the NRTC as the regulatory body responsible for issuing programming licences, while the granting of telecommunications licences was placed under the authority of the newly formed Communications Regulation Commission (CRC), which substituted the State Telecommunications Committee (STC) (Open Society Institute 2005: 363). The amended laws did retain the two licence types, but clarified that CRC is obliged to issue a telecommunications licence whenever the CEM decides to issue a programme licence for terrestrially broadcast radio and TV operators. This provision enforces the principle of conjoint competence, but with the programme licence as the primary authorisation (ibid.: 363).

The new rectifications to the LRT went even further in easing the licensing procedure for cable and satellite broadcasters in contrast to terrestrial broadcasters. Under a registration regime, introduced as a step towards the liberalisation of the media sector, operators that do not broadcast terrestrially can be awarded a registration certificate (Zaharieva 2006). Issued within a period of fourteen days, the certificates are valid for unlimited interval of time and are not binding with respect to the territorial coverage of the programme (ibid.: 37). While terrestrial broadcasters are dependent on the scarcity of the radio spectrum, no such limitations exist for programme dissemination by other technical means, such as cable and satellite transmission. Some media experts, therefore, express concern about the registration regime, as it seems to place broadcasters in an unequal position, and thus, provide much easier conditions for the operators who do not broadcast terrestrially (Open Society Institute 2005: 365).

2.3 The new broadcasting landscape

Firmly rooted in the period before 1989, after the breakthrough of democracy the Bulgarian National Television was regarded as “(...) a dangerous mammoth standing in the way of private media enterprise” (Spassov 2008: 2). When the
commercialisation took the upper hand, threatening the very quality of television programme services, the pendulum swung back. BNT’s hegemony collapsed with the creation of what has become a ‘dual system’ of competing public service and private commercial broadcasters. BNT’s monopoly in terrestrial television was broken in 1994 when the first private television station, Nova TV, was launched, initially covering only the capital. Due to the lack of media legislation in this period, Nova TV operated on the basis of a ‘temporary permit’. In sum, around thirty local TV stations were granted permission to broadcast in 1994, while the rules of national licensing were tightened (Bakardzhieva 1995). BNT’s supremacy was challenged at the beginning of the new millennium. In December 1999 Balkan News Corporation (BTV), a subsidiary of Rupert Murdoch’s News Corporation successfully bid for the first national licence for commercial terrestrial television. The monumental transition happened amidst heated debate about the licensing procedure. After much media attention and public concern in the country, BTV was allocated the frequency of the former second channel of BNT (Efir 2), and became the first private national channel. In November 2000, a new licensing procedure for a third national terrestrial broadcaster was initiated, and won by Nova TV, owned at the time by the Greek Antenna Group. The Supreme Administrative Court (SAC) however, quickly revoked the decision, after violations in the licensing procedure were revealed. In 2003 the bid was rerun. Nova TV emerged as the acknowledged winner and became the third key player in the Bulgarian broadcasting sector (Open Society Institute 2005: 347).

Due to the introduction of the registration regime, the arrival of commercial media led to an astonishing number of outlets, thus stimulating market competition and pluralism of voices. As of 2010, more than 200 television channels are currently operating in the country, both terrestrial, cable and satellite (MAVISE 2010). The eight terrestrial channels include the nationwide BNT, and the commercial stations BTV, Nova TV and TV7. The remaining terrestrial channels are BNT regional centres in the cities of Varna, Rousse, Plovdiv and Blagoevgrad (Open Society Institute 2008). The aforementioned three national terrestrial channels dominate the market, leaving the other local operators with relatively insignificant audience share.

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10 TV7 started on air in 2005 as the third national commercial channel. In 2009 it was bought by the Austrian investment fund Bulgarian Media Holding GMBH. TV7 currently has twenty-four hours general entertainment TV program, and is the only TV channel in Bulgaria that is authorized to air Formula 1 competitions exclusively.
In 2001, for the first time in its broadcasting history, BNT started losing its predominance in the face of growing private sector provision (Market Test 2001). BNT’s audience share is since declining, dropping from 38.3 percent in 2001 to 19.5 percent in 2005, to 7.7 percent in 2010, (Todorov 2010; Central European Media Enterprise 2010).

In general, the introduction of commercial television has increased the importance of economic and financial factors. The liberalisation contributed to the creation of a broadcasting industry in Bulgaria, which obeyed the requirements of demand and supply, and underlined the role of broadcasting as a business rather than a service. The entrance of a prodigious player in the market (News Corporation) boosted the volume of advertising and also encouraged other big multinational companies such as Modern Times Group (MTG) and Central European Media Enterprise (CME) to enter the broadcasting sector. With the growth of competition, the fierce fight for advertising revenue and the expansion of commercial TV logic have become the most influential factors determining the dynamics of the sector. The media system, and broadcasting in particular, is given shape not only by economic and cultural factors, but also by political determinants in the form of ownership participation, decision-making and media policy. The western influence seems to be constrained primarily to the market area, as the restructuring of the media system into a pluralist and independent Fourth Estate appeared a tough task. Besides, although the legislative step was made, the move towards public service broadcasting has been negatively impacted by the decline in state subsidies, and an overall political reluctance to provide adequate financial conditions of its implementation. The funding arrangements based on state subvention and commercial proceeds, and the intense competition for advertising revenue and audience attention, have impeded the proper implementation of PSB. As Jakubowicz (2004: 54) claims, the successful introduction of the public service ideal is so extraordinarily difficult to achieve, that it could be regarded as a true test of post-Communist transformation overall.

11 Modern Times Group bought Nova TV in 2008 and kept expanding its portfolio in Bulgaria by acquiring other television channels. Central European Media Enterprise, accordingly, became an owner of BTV in 2010 and all its niche channels, after Rupert Murdoch’s Balkan News Corporation threw in the towel and sold all media properties in the country.
2.4 Summary

During the communist time the television in Bulgaria was generally regarded as a propaganda institution, and an essential component of the monolithic state and party ideological apparatus. The change of the broadcasting system in the country was part of the broader political change, instigated by the fall of the Berlin Wall. The year 1989 was a turning point in many ways, and emblematic of a major transition from a totalitarian regime towards a process of democratisation. The formation and reorganisation of the Bulgarian broadcasting system have undergone a number of twists, hindrances and halts. The process of transformation has been highly politicised and chaotic, permeated with hardships and uncertainties. The years spent, first, in regulatory vacuum, and later in faltering legislative attempts impeded the process of radical transformation of the state medium into a public service broadcaster. As a result, PSB in post-communist Bulgaria was not given time to get public legitimacy during the transitional period and was compelled to compete from the start with its commercial counterparts. Moreover, the centralised command economy was, accordingly, substituted by a firm commitment to an unbridled free market, which further challenges BNT’s complex situation. For the time being the fundamentals of truly free and democratic public service institution have been laid down. What remains is a matter of time and a democratic experience.
3. The role of media in modern societies: Theoretical framework

The succeeding chapter is aimed at elucidating academic contributions that will lay the theoretical fundament for the analysis of the Bulgarian public service operator. Studying the Bulgarian National Television from the vantage point of both traditional public service theory and from a market theory perspective is reckoned necessary for improved understanding of the wider cultural and economic forces that circumscribe and penetrate the material and discursive practices of media organisations. In the intersection between the normative pillars of public service broadcasting and the liberal lens of the free market, I seized a theoretical approach that will contribute to a critical assessment of BNT’s challenging state of affairs. Each theoretical perspective, accordingly, has a different approach to the realm of television, as each emphasises different impetuses for organisation and programming paradigm. By drawing on their underlying principles, I attempt to identify BNT’s standpoint in between these two opposing philosophies.

Outlining a theoretical framework entails a discussion of earlier theoretical stances that are premised on other empirical data and, besides, have significantly more lofty aspirations than is the case of this thesis. For considerations of space I would not account for these theories in all their variants but rather elaborate on the theoretical aspects that could assist in investigating the tension between public values and economic interests present in BNT.

3.1 The public service approach to television

Despite the many differences between PSB systems in different countries, the fundamental features shared by all these models refer to “the idea of broadcasting as primarily a social rather than an economic process, as something with moral, cultural, intellectual, and creative purpose and not just a source of mild comment and moderate
pleasure” (Tracey 1998: 19). PSB is very much a product of a particular historical period, closely attuned to its essential principles and goals of operation to the social, cultural and technological realities of the time (Jakubowicz 2007:117-8). The eminent entrepreneur David Sarnoff, was given credit for being possibly the first to speak of broadcasting radio as a public service (Van Dijk et al. 2005), claiming that it represents a job of entertaining, informing and educating the nation (Briggs 1985). Sarnoff outlined the identifying characteristics of PSB - entertain, educate, and inform - which have remained at the heart of the public service aspiration (Holland 2003), sturdily dominating the PSB policy debates. His vision was, however, neglected as the American broadcasting industry was largely taking shape in a commercial course, where a consumer-oriented broadcasting model with a pluralistic marked structure was prioritised. Instead, it was the approach adopted across the Atlantic that became the quintessential model, defining public service broadcasting. Although there has never been a generally accepted ‘theory’ of PSB (McQuail 2005:179), the conceptualisation of the notion is grounded on the experiences of the British broadcasting and on the normative values of its underlying philosophy (Collins 2002).

3.1.1 The origins of public service broadcasting: the British experience

The genesis of PSB in Europe is often related to a renowned figure in the history of British broadcasting, Lord John Reith, who first gave ‘public service’ an institutional form (McDonnell 1991). As the first Director General of BBC, Reith introduced the concept of public service broadcasting as a collective expression of his broadcasting ideology. He outlines BBC in a late nineteenth century progressive spirit emphasising a high moral responsibility to enhance the quality of life in Britain by bringing into the greatest number of homes all that is best “in every department of human knowledge, endeavour, and achievement” (Scannell 1990: 13). Public service broadcasting emerged at a time of ‘an economy of scarcity’ in broadcasting. There was a broad political consensus, expressed in every major public report into broadcasting between 1923 and 1986, that the frequency spectrum was a scarce national asset that needed to be administered in the public interest (Curran 2002: 195). BBC was then organised as a monopoly, designed to achieve a mission as a public trustee and to keep the power of broadcasting from falling into unwanted hands (McDonnell 1991; Avery 1993).
The organisation of PSB emanates from the welfare economics where the State is assigned an important role in ensuring that essential services reach all citizens. It was, thus, envisaged that as a public trustee, the broadcasting institution would serve the entire nation by providing a wide range of high quality programming that meets citizens’ needs and interests (Rumphorst 2007). An important element of the welfare state was the necessity to protect PSB from pure commercial pressures and political interests. The ideal of BBC was intended as an antithesis of the commercial model, prevailing in the USA, which was not viewed with much favour by most social and political elites (McQuail 1986: 153; Hutchison 1999; Palokangas 2007). The funding of BBC, therefore, came in the form of licence fees collected from the public, aimed at keeping the broadcaster away from government, private interest and commercial pressures. This source of revenue is often regarded as a means of funding *sui generis* which best corresponds to the role of PSB in serving the society (European Broadcasting Union 2009: 5).

Solidly built on a foundation of paternalism, the structure of BBC was oriented towards the desire to protect and guide, rather than the assertion of the right to rule. Through the trinity of information, education and entertainment, later to be dubbed ‘Reithianism’ (Born 2003; Achille & Mièle 1994), BBC was premised upon the ideal of maintaining high standards, which, however, largely reflected the ethos and tastes of the dominant social groups in England.

### 3.1.2 Philosophical underpinnings- the supreme role of PSB

**PSB as an agent of enlightenment**

The ethos of PSB is largely fostered within the overarching ideal of enlightenment of the society, which saw the intellectual maturation as “(...) the supreme guiding principle in the affairs of humankind” (Jakubowicz 2007: 118). PSB was, hence, conceived as a devoted agent of enlightenment, tirelessly serving the masses by spreading the wealth of cultural and intellectual heritage (Lowe & Stavinsky 2005). In a similar vain, Rowland and Tracey (1990: 12) commented that broadcasting in Europe is viewed principally as a cultural enterprise, being “part of the sector of society- along with theatres, museums, opera and symphony companies, universities
and education-that is responsible for generating and examining its linguistic, literacy, spiritual, aesthetic and ethic wealth”. Initially, the term ‘broadcasting’ is referred to the act of sowing, and mainly scattering seeds over a wide field by hand (Peters 1999; Gripsrud 2002). Although an agricultural metaphor, the term expresses a pretty modernist optimism on behalf of the media in question. The concept rests on the existence of a bucket of seeds -centralised resources of information, knowledge and the like- that is to be disseminated in the widest possible circles, aimed at yielding a rich harvest (Gripsrud 2002: 211).

The ‘public’ as citizens in a democratic public sphere

The Enlightenment mission of the PSB is deemed an essential prerequisite in which informed and involved citizenship would flourish (Corcoran 1996). Pursuing “the objectives of encouraging citizens’ access to and participation in public life” (Atkinson 1997: 49), PSB has been praised as a vital element of the healthy functioning of democracy in Europe. Public broadcasters operate within the ethos of social obligation, whereby the viewers’ choice is not based on consumer demand, but upon their ability to choose from a wide range of diverse programming required to fulfil the more complex requirements of their status as citizens (Graham & Davies 1997; Harrison & Woods 2007). As citizens, underscores Gripsrud (2002: 276), “we are interested in broad knowledge of the world and our place in it; we care about perspectives on, and debates about, our conditions and the larger contexts of our everyday lives”. Considered as the unifying value for the public domain, the citizenship perspective entails a focus equally on commonality- on individuals as participants in social, political and cultural communities- and on plurality- on the different identities and voices within such societies, and the need to enable the interaction between them (Feintuck & Varney 2006: 110; Born & Prosser 2001).

Moreover, the Habermasian concept of public sphere, as the realm of social life where information, ideas and debate can circulate in society, has become

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12 The term ‘broadcasting’ used to be a general metaphor for dissemination for scattered seeds thrown in all directions. Only in 1922, it was taken note of the application of the term to broadcast radio. The earlier notion of broadcast was already applied to sonic media in the 19th century. It was suggested that the Pope could ‘send broadcast’ his blessing by recording it, producing the records and distributing it via mail to countries around the world. See Sterne et al. (2008) for further reading.

13 Öffentlichkeit came into existence in Western Europe throughout the late 18th and early 19th centuries as a free space of public discussion among citizens, where modes of public communication are located at the heart of the democratic process (Habermas 1989). Through communication practices
central, organizing motive (Dahlgren 1995). The public sphere constitutes a
discursive forum where the public of citizens participate in a critical-rational debate,
so that a public opinion is generated (Harrison & Woods 2007). The public sphere
exists in the active reasoning of the public, steadily grounded in an essentialist model
of democracy (Raboy 1997; Collins 2002;). Building on Habermas, Scannell (1989:
140) argued that the “fundamentally democratic thrust of broadcasting lay in the new
kind of access to virtually the whole spectrum of public life that radio first, and later
television, made available to all”. The very nature of PSB is thus imbued with the
commitment to nurture shared social, cultural and political values as means of serving
the public interest. The notion of service, on the other hand, has its most concrete
manifestation in the public service broadcasting tradition. As Reith envisaged, the
idea of service is predicated on the right of access, asserted by the broadcasters on
behalf of their audiences, to a wide range of social, political, cultural events and
entertainments that earlier were available basically to small privileged publics
(Scannell 1989).

By and large, public service broadcasting was naturally forced to develop a
generalist orientation for its programme services and assume a universal service
obligation, which would be undermined if left to the imperatives of the free market.
Were it left to the basics of demand and supply, broadcasting will only become a tool
for exclusion where programming and access is basically determined by ratings and
ability to pay without regard to the marginalised (HelM 2005).

3.1.3 Guiding Principles of Public Service Broadcasting

Even though broadcasting in Britain has moved on since the skilful leadership of John

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14 The term public interest has proved notoriously difficult to define. Held identifies a tripartite
typology of public interest theories. First, ‘preponderance theories’ identify the public interest with the
reference to a simple majority of the public as a purely descriptive, aggregative concept, which could
be related to a preponderance of power, preponderance of opinion, or of utility. ‘Common interest’
theories define it in terms of unanimity and agreement among all members of a polity. The third theory
refers to unitary conceptions, determined in accordance with one dominant judgment or viewpoint that
is deemed valid for all and consistent with the public interest (Harrison & Woods 2007: 27; Feintuck &

15 In essence, the idea of service has been recognized as one of the great achievements of the
Victorian middle class that is deeply inherited by its descendants (Williams 1961, quoted in Scannell
1990).
Reith and some of his arguments are no longer applicable these days, the principles that guide PSB today can partly be recognised in some of his early arguments. Despite the national variants of public service broadcasting across Europe and the diverse, however generally similar academic contributions, “an overlapping consensus on certain core normative criteria” is evident (Born & Prosser 2001: 671). These criteria can be condensed into a few core principles such as *universality, diversity, and distinctiveness*.

Broadly speaking, the principle of universality has been tied to the operational provision of affordable access to free-to-air services (Raboy 1996). Universality is thus recognised, as a fundamental axiom for public broadcasting in the sense that PSB must be technically available to the entire population. As “a deeply egalitarian and democratic goal”, it puts all members of the society on the same footing regardless of their remoteness and socio-economic status (Banerjee & Seneviratne 2005: 15). Despite the critique on the view of the public 16, PSB embraces a more pluralistic model of the people, aiming to provide a variety of cultures, both elite and popular of high quality.

Diversity, on the other hand, should manifest in the provision of a broad range of programmes that caters for and reflects the interests and tastes of the population. The principles of diversity should be manifest in the PSB’s commitment to ensure the diversity of programmes and viewpoints, to cater for cultural variety and to present different subjects on the agenda. Deemed “a full portfolio’ content provider”, PSB is expected to cater both for programmes for small groups as well as broad sections of society. Both majority programmes worthy of involvement and minority programmes of high standards that enable previously excluded minority voices that need to be heard (EBU Media Strategy Group, quoted in Bardoel & d’Haenens 2008: 344). The underlying assumption is that diversity of programmes and audiences, as well as plurality of voices and subjects discussed will extend the universe of public discourse and will, further, add to the general richness and variety of cultural and social life. Universality and diversity are, thus, regarded compatible in the sense that programmes pursued are guided by broad national goals and values, while taking into

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16 The Reithian public service model has been criticised for having an inbuilt tendency to view the people as masses (Williams 1962: 108, quoted in Stevenson 2002). The ‘masses’ denotes a way of thinking about the people as a general public with common values and interests, denying their cultural plurality.
Public service broadcasting needs to maintain a sense of distinctiveness through its programming that should be evident in the structure and composition of programme schedules. Importantly, programmes should be of such quality that they set the standards for industry. Quality goes beyond production values and plot, and includes issues of variety, concern for national identity and innovation. Broadcasters’ independence from vested interests and government, therefore, is a vital prerequisite for airing impartial, balanced and objective news and information. Thus, the programmes offered by public service broadcasters could best serve the public with excellence and diversity when they are produced from within a structure of independence. Besides, supporters of PSB point, therefore, to the ‘market failure’ rationale as one of the main reasons for protecting and regulating public service broadcasting. This argument revolves around the claim that there are inherent structural deficits in the market for television programming and distribution, which requires government intervention and protection. Accordingly, the market alone is considered unable to deliver the paternalistic ‘what the audience needs’ ideology. Public service media claim to be an instrument of the public good, not a means of handling people, entertaining them or of pandering to their passing wants (Keane 1991: 56).

3.2 The market paradigm - the liberalist perspective

3.2.1 The dawn of the new media age

The free market approach is built upon the ideals of the classical liberal theory of the free press, stretching as far back as 1700- and 1800s (McQuail 2005). It was England that shaped the ethos of private market competition by introducing the BBC- ITV duopoly in 1954, but this was a form of competition that was well within the public service theory ideals. The rising support to the liberalism became discernible when the ideological wind of the political Right blew over the European media realm in the 1970s and 1980s (Humphreys 1996). The old language of ‘liberty of the press’ was revived, and, thus, making a grand return to the centre stage of public debate (Keane 1991: 52). The Right- wing libertarians argued in favour of treating broadcasting as a market that ideally should be freed of all but minimal regulation, so that, market
forces should be given the widest possible freedom of operation (Murdock and Golding 2005). Proponents of deregulation and economic liberalisation, the market liberals contended that marketisation of broadcasting would unburden the viewer from “(...) the old fashioned moral paternalism of ‘nanny state’ broadcasting and deliver genuine consumer sovereignty in its place” (Humphreys 1996: 161). Market advocates argued that the monopolised PSB involved systematic censorship of consumers’ choices by providing programmes that governments considered good for the populace (Murdoch 1989: 2; Keane 1991). Therefore, the development of a broadcasting system of market-based competition was greeted as a much more neutral and efficient regulator, which provides audiences with as many alternative sources of supply as possible, and thus treats them as the ultimate judges of their own interest (Keane 1991: 58). In the 1980s, the Peacock committee in Britain received confident and well-presented submission arguing that programmes should be determined largely by people’s preferences (Curran 2002: 200).

In line with these precepts, the liberalisation and the concomitant privatisation of the media markets started in the early 1980s as a joint result of political decisions, economic pressures and technological innovation (De Bens 2007). The paradigm shift was driven by the liberalist ideology that the free market would provide a new external pluralism of channels and multiplicity of independent voices, in the place of the old ‘bureaucratically’ manufactured internal pluralism (Humphreys 1996: 162). According to Bardoel and d’Haenens (2008: 337), Murdock and Golding (1999) rightly signalled two parallel movements at the end of 1980s and 1990s that tipped the balance of power from the culture to the market paradigm. The key driving forces in this transition was the ascendency of marketisation policies within the European Community, latterly the European Union, and the accelerating convergence trends of ICTs, telecommunications and the audio-visual industries.

3.2.2 The underlying logic

The segmentation of the market which a multi-channel system gives rise to strikes against the notion of ‘public’, on which the idea of public service has been and is currently based. The nature of the television system, as well as more general social and cultural trends, suggest that the entity known as ‘the general public’, the
collective whom PSB should serve, is slowly, but surely disintegrating (Søndergaard 2006: 6). In today’s multi-channels systems the public is primarily regarded in terms of individual consumers with immediate consumer demands constituting the prime parameter that steers the system’s development (ibid:6). Based on consumer sovereignty, this system recognises that viewers are the best judges of their own interests, which they can best satisfy if they have the option of purchasing the broadcasting service they require from as many alternative sources of supply as possible. Government, therefore, should not determine content decisions, at all, as a competitive market will deliver a socially desirable mix of programming. A market-based capitalist economy is, thus, considered legitimate and viable.

In contrast to PSB’s goal of welfare maximisation and engagement of viewers into a public dialogue, the market is entirely determined by profit pursuits. The market is driven by returns on investment, which in television broadcasting, are determined by selling audiences to advertisers. Commercial operators are largely supported by advertising, and therefore require popularity that leads to the profit maximising. In this dual product market that television broadcasting operates in, audiences themselves are the primary commodity (Doyle 2002). The economics of commercial broadcasting revolves around the exchange of audiences for advertising revenue. The price that advertisers pay for advertising spots on particular programmes is dependent on the size and the social composition of the audience it attracts. In prime time, especially, the premium prices are commanded by shows that can attract and hold the greater number of viewers and provide a symbolic environment in tune with consumption (Murdock and Golding 2005). These needs inevitably tilt programming towards familiar and well-tested formulas and formats and away from risk and innovation. Hence the audiences’ position as commodities serves to reduce the overall diversity of programming, and it is argued that the increasing privatisation and commercialisation of public space has lead to an abundance of dominant, cheap transatlantic programming forms that serve the ideological role of perpetuating the capitalist ethos.
3.3 Programming dichotomies

According to a classical finding of Raymond Williams (1974: 78-86), the two paradigmatic models of broadcasting underline different programme types in their output. This distinction suggests that public service stations tend to conform to Type A programming, favouring news and public affairs, culture, music and arts, documentaries and children’s programmes, whereas commercial television apply a Type B programming focusing on movies, series, serials and soap operas. Hence, this division of labour highlight that whereas public broadcasters emphasise their informative and cultural fare, the commercial channels’ ideology promotes popular programming pertaining to fiction and general entertainment.

In line with the perceived patterns of programming, discourses on programming policy further suggest that public broadcasters provide a wide variety of programmes as opposed to advertising-supported commercial channels that schedule a narrow range of programme supplies (Blumler et. al 1986). The programming assignment of public service broadcasting has been in the current debate summarised by the catchwords ‘comprehensive’ or ‘complementary’. They represent two competing visions regarding the survival and the future of the public service broadcasting ethos, largely threatened by the market forces at hand. As Jakubowicz (2003: 155) argues, the former refers to the full-scale public service model, where public broadcasters continue to offer programmes of all categories, whereas the latter refers to a pure ‘monastery model’. The monastery model vision is shared by the critics of the commercialisation of PSB and is largely confined to programming, concentrating on the kinds of programmes that commercial channels tend to neglect. Such complementary function of PSB also arises from the unrelentingly narrowing imperatives of the marketplace (Blumler 1992b: 26). From an economic standpoint, complementarity is articulated in the fact that public broadcasters are predominantly funded from public sources (e.g. licence fees, state subsidies), and, therefore, not directly dependent on ratings and driven by economic considerations. The discussion of these alternative versions has also implications for the origin of programming. The public broadcasting tends to foster a strong national production base, whereas commercial entrepreneurs rely greatly on foreign popular programmes that can attract a large audience, and, thus generate more income through advertisements.
3.4 Advertising in PSB- purist and pragmatist responses

The predominance of the mixed funding has become a permanent characteristic of the contemporary PSB funding design, where commercial income sources have been regarded both as tremendous danger to the public service commitment and as urgent necessity. Both purist and pragmatic responses seem valid. Many analysts of the broadcasting scene advocate the principle of ‘to each his own’- public funds for public broadcasters and commercial funds for private channels. Viewed from this purist perspective, only public money is compatible with the prime purposes of public broadcasters while commercial activities are inherently subversive of them (Blumler 1993: 403-404). The pragmatist stance holds that public service operators “(…) will be perilously enfeebled if they eschew all commercial earnings” (ibid.: 404).

Thus Gheude (1990) argues that in the consumer society where everyone is defined more and more by their life style, PSB can no longer be characterised by the absence of advertising slots, because advertising is not a mode of funding, but the expression of consumer society (Atkinson 1997: 52). Cache, on the other hand, considers that advertising obliges public broadcasters to take account of their viewer ratings that constitute an important indicator of performance (Atkinson 1997: 52).

Advertising would, thus, enable PSB to be more receptive to viewer demands and would free it from certain politico-administrative desires and pressures. It is, however, widely recognised that this mode of funding is delicate and is likely to commercialise the programming profile of public broadcasters. It’s important to notice, however, that certain broadcasts on PSBs, which were criticised for being too commercial, have tapped the revenue, which enables broadcasters to present other programmes more representative of the public service.

Yet the arguments continue in support of a fair balance between commercial interests and a public service remit. O’Hagan and Jennings (2003: 45) apply a model, where they try to fit all broadcasters into two-dimensional space, considered in figure 3.1 The model is more idealistic than feasible, given that an adequate measure of the public service remit is not yet discovered. For public broadcasters, a placement in quadrant I would be the desired result, namely, a positive public service remit along with some commercial viability, although the latter could be sacrificed for the former.
Quadrant III would also be justifiable. As the only dimension important for commercial broadcasters is making a profit, unless they do not have any public service obligations, they will normally find themselves in the lower quadrants (II and IV). The diagonal line indicates the trade-off between fulfilling a public service remit and attaining commercial viability. As O’Hagan and Jennings explain, any movement to the right would lead to potential welfare improvement, whereas any movement to the left would have a destructive effect on welfare (*ibid.*: 45).

![Figure 3.1 Balancing public service remit and commercial viability](image)

**3.5 Summary**

The chapter laid down the theoretical framework for the study, discussing aspects of traditional public service theory and the free market perspective, upon which I will place my analytical arguments. The discussion of these alternative perspectives to the
public service notion is largely confined to programming and the kind of demands that are made of the public service companies, which will be further employed in assessing the position of the Bulgarian public service broadcaster between these two differing models.
4. Research Methodology

Traditionally, the academic debate about public service broadcasting has been primarily anchored in Western European and Nordic empirical data. By putting Eastern Europe in the limelight and, especially, drawing attention to a relatively unknown country in the realm of television broadcasting, this thesis can be construed as an extension of the public service discussion. To elucidate BNTs challenging state of affairs involves an investigation that embraces two conflicting camps, each governed by its own distinct logic. The breadth of analytical ambition, therefore, calls for a combination of various methodological approaches that will, in turn, provide for a more affluent inquiry scope for drawing accurate and plausible inferences. Aimed at capturing the complexity and dialects of the interplay at hand, the amalgam of document analysis, face-to-face interviews and content analysis of programme output constitutes the methodological framework for this thesis. The following chapter, accordingly, rivets attention to the methods and research techniques employed in the study. For considerations of space, however, I will not provide a comprehensive description of the whole research process. I will, therefore, reflect over the data collection process by accounting for certain moments of special relevance.

4.1 The methodological construction

In the process of moulding the research design for the thesis, of great significance to the research objectives, was to grasp the core of the issue at hand, and, accordingly, lessen the tension between theory and analysed data in accordance with the requirements of general validity (Holme & Solvang 1993: 80). In line with the nature of the subject matter, the study invited for an exploratory research design, aimed at investigating an area where there are few or no earlier studies to refer to (Grønhaug 1985: 11, quoted in Øsbye et. al. 1997: 261). The exploratory research design is, thus, regarded as versatile and flexible, as it is likely to lead to serendipitous findings and new integrations in the course of research (ibid.: 261). Even though a great number of media researchers have been occupied with the same controversial topic, these studies are predominantly devoted to Western and Central European broadcasters. As there is
no corpus of research that aptly addresses the PSB complexities in transitional Bulgaria, the utilisation of such design turned out pretty favourably.

The thesis started as an exploratory study, where exploration was considered a perspective, a way of approaching and carrying out the social study. At the early stage, the research objectives of the thesis were not firmly defined, so that to understand well the phenomenon under investigation required starting by looking at it in broad, non-specialised terms (Stebbins 2001). In the process of accumulating knowledge about the uneasy position of BNT, the flexibility of the research design gave me greater leeway to be attentive to new aspects and paradoxes that, in turn, provided fresh insight and ameliorated the initial assumptions.

4.1.1 The mixed methods approach to research

Considering that different methods provide different types of insight, the intricacy of the research objectives largely determines the choice for scientific research method. To capture the interplay between BNT’s dual funding and public service mission, the subject of interest needs to be examined from a multiple methodological lens. The study is, therefore, placed within the assumptions and the characteristics of the mixed methods approach to research. Despite the bewildering array of names, mixed methods research has become the most popular term used to describe “an approach to knowledge (…), that attempts to consider multiple viewpoints, perspectives, positions, and standpoints”, by integrating ideas from both qualitative and quantitative research (Johnson et al. 2007: 113). Mixed methods research is recognised as a powerful third paradigm choice, that increases the likelihood that the sum of the data collected is richer, more meaningful, and ultimately more useful in answering the research questions (ibid.: 122).

Acknowledging that methods in general have inherent biases and weaknesses, the mixed methods approach affords opportunities to use the strengths of some methods to counterbalance the weaknesses of other methods (Jonhson & Turner 2003; Axinn & Pearce 2006; Jick [1979] 2006). This study attempts to fit the insights provided by qualitative interviews, document- and content analyses into a feasible
composition that stimulates fruitful explanations and substantiated findings. These three research techniques are considered complementary\(^{18}\), as they attempt to mutually inform each other to generate a deeper and more nuanced understanding of BNT’s bifurcated state. A comprehensive understanding of the subject under investigation might be missed, when only a single method is used (Johnson & Onwuegbuzie [2004] 2006). Quantitative content analysis is employed to objectively analyse the programme output of the Bulgarian public broadcaster and to investigate whether programme supply reflects the ethos of public service programming or to a greater extent mimics the programme paradigm imposed by commercial operators. This cannot, however, adequately explain the programming policy of BNT, as well as examine the relationship of advertising to the range and type of programme output. This is where qualitative approach has its respective strengths.

The strengths of qualitative research emanate primarily from its inductive approach, focus on specific situations or people, and emphasis on words rather than numbers (Maxwell 2005). The qualitative researcher is said to look through a wide lens, attempting to make sense of, or interpret, phenomena through people’s perspectives and the meanings people bring to them. Contrary to quantitative research that is tightly prefigured, qualitative research has an inherent openness and flexibility. The qualitative approach “(...) embodies a view of social reality as a constantly shifting emergent property of individuals’ creation” (Bryman 2004: 20), that enabled me as a researcher to modify the study throughout the research process so as to recognise new discoveries and relationships. As Weiss concludes, qualitative data are “apt to be superior to quantitative data in density of information, vividness, and clarity of meaning” (Weiss 1968: 344, quoted in Jick [1979] 2006: 226).

\(^{17}\)This third methodological movement has been given many names, among which “blended research”, “integrative research”, “multimethod research”, “multiple methods”, “triangulated studies”, “mixed research” etc. For a better insight, see Johnson et al. (2007).

\(^{18}\)The combination of quantitative and qualitative methods may arise in three diverse outcomes: 1) quantitative and qualitative results may converge, so these results lead to the same conclusion; 2) they may relate to different objects or phenomena but may be complementary to each other and thus can be used to supplement each other; 3) results may be divergent or contradictory (Erzberger & Kelle 2003: 466).
4.2 Document analyses and qualitative interviews

Through the qualitative approach, document analysis and interviews share a fundamentally hermeneutic and social-semiotic epistemology, emphasising that both research and sources of research are results of opinion formation in a social context. In the subsections below issues regarding the operationalisation, access to and selection of informants and documents will be presented.

4.2.1 Document analyses

In the process of studying the public service orthodoxy and, specifically, the dual-funding scheme of the Bulgarian public broadcaster, I interacted with documentary materials so that specific statements and perspectives could be placed in the proper context for study (Altheide 1996). Document analysis, accordingly, refers to “an integrated and conceptually informed method, procedure, and technique for locating, identifying, retrieving, and analysing documents for their relevance, significance, and meaning” (ibid.: 2). In analysing the financial structure of the Bulgarian public service broadcaster, I used mostly primary sources. The document materials that were of great value when grappling with the monetary prospects and pressures were the Radio and Television Act, BNT’s annual reports, financial accounts and audits, market analysis. In accumulating knowledge about the programming domain and its guiding philosophy, in addition to programme licence and annual reports, I made use of empirical data predominantly generated by the broadcaster itself, such as internal papers on the station’s programme regulation and established programme categorisation. The study is further complemented with secondary sources of information in the form of newspaper articles that provide valuable aspects to the issue of interest. As the data are ‘found’ rather than ‘made’ through my intervention in the field, the production of these documents is part of the normal business of media, and thus is not biased by my interest as a researcher (Jensen 2002: 243).

The selection of document materials for analysis was based on the principle to prioritise in accordance with the richness of information they contain. This refers to what Patton (2002: 230) calls purposeful sampling, as opposed to the random sampling selection. Seeking to provide useful insights into BNT’s financial and programming activities, I attempted to concentrate first and foremost on the documents that were of greatest relevance to the research objectives (Østbye et al.
At the early stage of the data collection process, I faced difficulties in gaining access to significant documents. This could be explained with the fact that both online and offline availability of public documents has not yet become a common practice in Bulgaria. It was when I first established contact with a key figure in the Management Board of BNT, Boyko Stankushev, that the access to important documents and internal reports became feasible. Internal papers regarding the marketing and advertising activities of BNT could have been of great value to the study. I was, unfortunately, denied access to such written materials, as they were part of the administrative process. I presume that the limited time I had at disposal at the Marketing department deprived me from establishing good rapport with the marketing director. The marketing team, however, was rather helpful in clarifying information of similar character, and here is where the use of interviews, as a complementary source, proved necessary indeed.

4.2.2 Qualitative interviews

In this study, document and content analyses formed the methodological scaffolding for the data collection. Moreover, I endeavoured simultaneously to acquire self-generated empirical material through qualitative interviews. The purpose was to give nuances and further enhance the rest of the empirical data that at times had somewhat limited and incomplete explanatory value for the research objectives. Depending on the degree of the questions’ predetermined content and succession (Østbye et al. 1997), interviews can be characterised along a quantitative-qualitative dimension, varying from the formal standardised examples (surveys), to an unstructured situation of qualitative depth in which the interviewees are encouraged to answer questions in their own terms and within their own frame of reference (May 2001: 121). In congruence with the study’s explorative nature I opted for semi-structured interviews, administered within a fairly open and flexible framework, and guided by relatively specific questions organised by themes (Bailey 2007; May 2001; Kvale & Brinkmann 2009). The flexibility of the type employed allowed me to structure the pace of the interviews, to rephrase questions and direct the conversations at aspects that are tangent to the research objectives. Furthermore, this flexibility, left room for the respondents’ own reflections and enabled probing for more detailed responses. The duration of the interview recordings varied from half an hour to over an hour. In many
of the cases it was the schedule of the informants, appointments and deadlines, which set limits to the interviews’ length.

The access to interviewees represented another major challenge. As the process of approaching respondents was going to a dead-end, I contacted two eminent professors at the New Bulgarian University in Sofia, requesting to recommend potential respondents with specialised knowledge that could provide valuable information to my study. The selection of informants was, therefore, largely guided by what Patton (2002: 237) refers to as chain sampling, where the informant from one interview is used to locate which persons are of current interest for the next one. The selection of informants was steered by the criterion of the respondents’ professional or academic connection to the Bulgarian public service model. This chain sampling approach enabled me to locate and interview information-rich persons from various spheres of the media sector. This resulted in a group of nine respondents comprising of regulators, broadcasting professionals among which past and present staff of BNT, independent assessors such as researchers and academics that offered independent opinions about the challenging state of the public television in Bulgaria. The interviews were approached from what Pertti Alasuutari (1995: 47-48) calls the factist perspectives, where the research material is assessed as more or less honest and truthful statements about the world ‘out there’. Unlike the specimen perspective where data is seen as part of the reality being studied, the factist perspective treats the data collected as either a statement about or a reflection of the object of study.

4.3 Methodical approach to programming schedules: content analysis

To grasp the tension reigning within the institution of BNT, a closer investigation of the programming output is required as it is where the interplay is most palpable. The programme schedule is considered a genuine expression of a broadcaster’s programme philosophy, referring to a lawful conterminous set of planned and coordinated production activities (Nikolova 2006: 306). Intended to verify the convergence assumption or discover evidence for preserved pluralistic programme

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19 In accordance with the Bulgarian media studies, a programme schedule is a unified and purposeful propaganda system of ideas. Propaganda is often deemed a public fact, expressed in the proliferation and explanation to society of certain ideas or political doctrine. Its realisation as a specific
profile, the analysis of transmission schedules was constructed as a purely *ad hoc* study. For that reason, I chose to embark on a methodological approach, built on a quantitative content analysis of the broadcaster’s programming schemes, which are most natural to associate with the commercial organisational and production practices. By employing content analysis I was able to assess the programming profile and inclinations of BNT, as well as juxtapose policy claims with practices.

Broadly speaking, content analysis is aimed at characterising a particular type of content by looking at a representative set of data that results in numerical accounts (Davies & Mosdell 2006). In his famous definition, Berelson (1952) combines earlier methodological reflections on the approach, defining the term ‘content analysis’ as a research technique “for the objective, systematic, and quantitative description of the manifest content of communication” (Schroeder 2002: 118). The requirements to be objective and systematic are subsumed under the dual requirements of replicability and validity, which entails that the process must be governed by rules that are explicitly stated and applied equally to all units of analysis (Krippendorff 2004: 19).

### 4.3.1 Selection of programme schedules

The selection of programme schedules is limited to the years of 2009, 2010 and 2011. As throughout the period of the whole 2009 and the first half of 2010 BNT was governed by the same administration, I found that the programme schedules for these years were rather similar if not homogenous. I decided, therefore, to include the first half of 2011 in order to reflect on whether the programming policy of the new management deviates from the previous one. A few limitations were, therefore, taken into consideration. The high season and low season distinction has been instrumental in the selection of transmission schedules. Aiming to avoid the summer and winter season months that represent, respectively, the lowest and the highest level of viewing figures, the choice fell on the month of May, that coincided with the first period of my fieldwork. Moreover, Bulgaria’s abounding calendar of national events and holidays represented a further delimitation factor for selection. The wish to shun as many as possible of the holy and national days, as well as events (e.g. world sports championships, national elections) that generate asymmetric audience attention than normal, was a subject of priority. My intention was also to focus on the same period...
for investigation regarding both BNT’s programme schemes and its main commercial rivals (BTV and Nova TV). As a result, samples were limited to week 20 in 2009, 2010 and 2011, a period characteristic of a relatively normal programme activity. Although this selection may not be representative of the annual output, I argue that it provides a true reflection of BNT’s programming patterns and policy, against which I will place my analytical arguments.

4.3.2 Segmentation of programme time

To provide a more comprehensive picture of BNT’s programming offerings and their allotment in the schedule, I divide up the transmission schedules into three different component segments (morning, daytime and evening). The division is primarily grounded on the standard apportionment of time zones in the country, but encompasses only the time from 6.30am to 01.00 am after midnight. The morning output of BNT spans the time interval from 6.30am to 12.00am, including the segments early morning (6.00am- 9.00am) and morning (9.00am-12.00am). The daytime programme zone encompasses the time between 12.00am and 18.00pm, referring to the subdivisions, respectively, noon (12.00am- 14.00pm), early afternoon (14.00pm- 16.00pm), and afternoon (16.00pm- 18.00pm). In considering the evening segment, however, the present peak viewing hours appeared to deviate from the standard apportionment of the evening zone due to elongation of the prime time interval imposed by the commercial broadcasters. I adopted the division that the public broadcaster adheres to, respectively, early prime time (18.00pm- 19.00pm), prime time (19.00pm- 22.00pm), and late prime time (22.00pm- 23.00pm). A small part of the night offerings (23.00pm- 01.00am) is also included in the study given that BNT broadcasts first runs even after midnight. The rest of the night programme provision, comprising of reruns is accordingly excluded from the study, as repetition psychological impact and pressure, known by the totalitarian social systems (Nikolova 2006: 308).

20 In line with the standard apportionment of time zones, the evening viewing hours are divided into early evening (18.00pm- 20.00pm), evening – active viewing time (20.00pm- 23.00om), and night (23.00pm- 06.00am) (Nikolova 2004: 100).

21 In Bulgaria, the unwritten watershed in the evening programme has existed since the early 60s of the twentieth century, and used to start with the main newscast at 20.00pm, just after one of the most emblematic programmes, Good Night, Children, aimed at the youngest audience (Nikolova 2004: 102). The private sector in the face of BTV and Nova TV, however, imposed extension of the evening zone, by drawing out their newscasts even earlier (ibid. 102).
of programmes broadcasted throughout the daytime is deemed irrelevant to the overall outcome.

4.3.3 Establishing programme categories

In the process of establishing programme categories, researchers often encounter delimitation problems. These are generally caused by the lack of a universal television programme categorisation and the overlapping attributes of programmes where as a consequence of the commercialisation different genres tend to blend. To surmount such challenges and minimise the risk of errors and subjective reflections, the categories established are premised on the programme classification adopted by the Bulgarian public broadcaster. Coinciding with the programme definitions of the European Broadcasting Union (EBU), BNT’s classification scheme consists of sixteen programme types. Out of the intention to simplify this classification and at the same time still reflect the rich diversity of categories, I developed a category system comprising of ten programme types. In the process of abridging the number of categories, I leaned on the common research practice of placing each programme in just one category, based on form, genre, target audience etc (Nikolova 2004). The thesis, accordingly, adopted the following programme categories.

**Informative programmes** refer to daily news, newscasts, and factual programmes on social issues and topics of general interest, which inform and clarify facts, events, theories and predictions. **Current affairs** mainly refer to regular discussion and debate programmes that deal with current topics of political, economic and social character. They are usually presented in a format that often includes interviews and commentaries. **Human stories** describe programmes devoted to the destiny of ordinary people reflected through narratives on their life situation. **Arts programmes** have been used to describe the ‘culture’ category. I have deliberately avoided the use of the ‘culture’ term because of its vagueness, which can be confusing and ambiguous. Arts programmes embrace here both programmes of cultural and religious character. The category refers to types of art performances such as theatre and ballet, fine arts, and programmes that enrich people’s knowledge in literature, religious traditions, philosophy, science, architecture, aesthetic photography and so forth.
Educational programmes refer primarily to all programmes, documentaries, popular science, which by their design have a strong teaching element. They are intended to educate with prevailing pedagogic effect. Sports programmes comprise live coverage of sports events, replays, in-house sports programmes, comments and analysis. Sports news is excluded from this category, as they are classified as informative programme. Fiction refers to a wide range of motion picture forms, such as television films, features, series, serials, soap operas, sitcoms etc. Entertainment, on the other hand, encompasses all programmes with the primary purpose of amusement, including shows, games, talk shows, reality TV etc. Musical programmes represent a category where music is in the main focus. It covers both musical events and other programmes principally consisting of musical performances of various genres. Children’s programmes are based on target audience rather than form or genre. It involves programmes, which are specifically produced and targeted at children and youth, spanning all programme content areas from cartoon series, children magazines, and specific content related to the young audience segment.
5. The Financial Mode of BNT under Magnifying Glass

The funding of public service broadcasting and the way it is provided are important considerations insofar as they have tremendous impact on the organisation and the programme output of public service corporations (European Broadcasting Union 2000). The magnitude of the funding framework for the fulfilment of the public service remit has been recognised at a European level in a number of policy documents and legal texts, as the question of the status of the PSB provision has become one of the most controversial and pressing issues to be dealt with in the audiovisual sphere (Ward 2003). The Protocol on the System of Public Broadcasting in the Member States, annexed to the Treaty of Amsterdam from 1997 and known since as the Amsterdam Protocol, has been instrumental in ensuring that it is within the discretion of European Union states to provide for the funding of public broadcasting insofar as such funding is granted to broadcasting organisations for the fulfilment of the public service remit as conferred, defined and organised by each Member State (Official Journal of the European Communities C 340/109). The model of funding should not, however, affect trading conditions and competition in the Community to an extent, which would be contrary to the common interest.

Recognising the political, cultural and linguistic heterogeneity in Europe, EU has largely left the issue of financial arrangements to the individual nation states (Hujanen 2005; Iosifidis et al. 2005). Hence, in today’s intensifying competitive milieu, marked by inexorable rise and proliferation of new media and changing patterns of economic and social life, the battleground for the survival of PSB “(...) lies within the political and cultural confines of national boundaries” (Barnett 2007: 90). The following chapter describes, explicitly, the mixed funding structure of the Bulgarian public service broadcaster. It sets out the funding mechanism and the appropriation of financial resources, and seeks to explore whether the proliferating ‘market logic’ has tightened its grip on the public service values and, this, in turn, places the analysis of the programming profile of BNT in a greater perspective.
5.1 The funding arrangements of BNT

The Law on Radio and Television (LRT) passed in 1998 specifies the mixed funding system of BNT, comprising of state subventions and internally generated income acquired mainly through advertising and sponsorship (Pesheva 2000). Pursuant to Article 70 of LRT, the budget of both public radio and television broadcasters (BNR and BNT) should be drawn from the following proceeds:

- Financing from the Radio and Television Fund;
- State subsidy;
- Advertising and sponsorship proceeds;
- Revenue from additional activities related to television broadcasting activities;
- Donations and bequests;
- Interest rate and other income related to radio and television activity.

The broadcasting act and its numerous subsequent amendments stipulate that the public radio and television activity shall be financed by a monthly consumer fee, gathered on the basis of every registered electric gauge. Paid together with the due amounts for electric power, these fees are meant to constitute the major share of income for the independent Radio and Television Fund, primarily used for funding the public media broadcasters, the regulatory body Council for Electronic Media (CEM), and various cultural and educational projects. This mode of funding is envisaged to ensure financial independence of public broadcasters from the state budget allocations and to preclude any possibility of political interference by the government. By the same token, the media law specifies an overall modification of the financial base of BNT and BNR, designating the decline of the state subsidy at the expense of incremental funding granted by the Radio and Television Fund. LRT foresaw a complete termination of state funding and, respectively, total substitution by proceeds from the Fund. Despite the envisaged scheme for gradual shift, the Radio and Television Fund is, up to the present day, not operational. Its establishment has been postponed several times as no mechanism for the collection of fees has been

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22 The monthly fee for citizens amounts to 0.6 percent of the national minimum wage as determined by the Councils of Ministers, whereas for corporate persons and individuals carrying out trade activity, as well as state and municipal organisations, the fee is determined to 2.5 percent of the minimum wage. The broadcasting act also specifies the various risk groups that are exempted from paying such a tax.

23 Resources of the Fund shall also be raised from the initial and annual fees for issuance of programme licences and registration fees for radio and television activity collected by CEM (Article 102).
implemented. In token of lack of political will, the National Electric Company (NEC) was never authorised to collect these radio and television fees. Besides, NEC also refused to engage in actualisation of the lists of social groups exempted from paying, such as orphanages, people with special needs, risk groups etc. (Margarita Pesheva, Media Regulatory Expert, interview 18.01.2011).

The failure of the law in respect of the Fund is argued to have a negative effect on the development of the media sector in the country. In accordance with the last correction of the broadcasting act from 2010, the funding switchover is put off till 2012. The government, however, will hardly be able to ensure effective implementation of the legal provisions, as a team of experts, led by the chairman of CEM Georgi Lozanov, are currently working on a draft for a new media law. It is, though, more of a conception than a draft as it outlines the problematics of the existing law and traces possible routes for improvement, clarifies Lozanov in an interview (Spassov 2011).

At a seminar on the financing of public service broadcasting held in Sofia, collecting a television fee as the main source of funding is considered inadequate to the Bulgarian social and economic situation (Seminar 2002). In this respect, it is rather difficult to convince viewers to pay this fee in a country where the average standard of living is not high. However, it is argued that the political will for this undertaking is present, only the Bulgarian society has to become conscious of the necessity and utility to pay such a fee.

The Bulgarian citizens have actually never been given the freedom to form their own free will whether to pay these charges or not, because they are anyway being collected indirectly through taxes. The situation could have been different if we had been asked (…) (Assya Kavrakova, Specialist on media policy within EU, interview 21.01.2011)

The current Law on Radio and Television has long ago lost its organic aspect, and has departed from the concept of a law with a single philosophy, commented associate professor Lozanov (Varbanov 2011). The biggest deficits are to be found in the section ‘financing’:

In this respect we are a unique country. The government entrusts the programming mission of BNT. The Parliament passes the decree, and then the Council for Electronic Media issues the licence that we are expected to adhere to. Given that the Radio and Television Fund is inefficient, the executive
authority basically funds the public broadcaster. The big paradox is that one orders the music and another pays for it. Since the Law on Radio and Television has come into force, these two authorities have never demonstrated whatever synergy. So, the public broadcaster is entirely dependent on the will, sympathies and antipathies of the executive authority, and, in particular, the Minister of Finance. (Boyko Stankushev, Member of the Management Board of BNT, “Programme Development”, interview 27.01.2011)

On the whole, the legally defined model of financing the Bulgarian public operator has come into conflict with the reality of the funding system. What is required is not further amendments to the existing media law, but a new broadcasting act that conforms to such a rapidly evolving strategic field where the convergence of telecommunication, online media, information technologies and publishing necessitates an adequate legislative approach (Margarita Pesheva, interview 18.01.2011). In an election year, however, this will hardly be the case. Politicians will once again eschew introducing a radio and television fee, as they fear making themselves unpopular with citizens who may see the fee as disguised taxation. The funding model envisaged is, hence, regarded a compromise that has been going on for a very long period of time (ibid.: 18.01.2011).

5.2. Government subvention- a central piece in the financial puzzle

In reality, the main pool of funds for the Bulgarian public broadcaster comes from the state budget, adopted annually by the Bulgarian Parliament. Pursuant to Articles 70 and 71 of the LRT, the state subvention is granted for the preparation, creation and the transmission of national and regional programmes, whereof at least 10 percent should be allocated for Bulgarian film production. Moreover, an expedient subsidy for long-term assets is provided according to a list annually ratified by the Ministry of Finance. The expenditure part of the budget is made in compliance with the classification for the expenses of the State budget as instructed by the Ministry of Finance. Any surplus of annual income over expenses at the end of the year is rolled over into the budget for the successive year. As a rule, the public television broadcaster works out its own budgetary draft, which is to be approved by the regulatory authority, and then adopted by the Parliament with the national budget for the forthcoming year. The Bulgarian Chamber of Accounts, subsequently, conducts an autonomous financial audit of the public broadcaster after the accounting year has passed.
Theoretically, the direct state subvention is a hazardous form of funding, as there is a risk that the public authorities or political parties will use this ‘leverage’ to gain influence over editorial policy, or even without such interference, broadcasting organisations may be inclined to please bodies which have decision-making power over the funding (European Broadcasting Union 2000: 4). Several myths about BNT have been created, which were intentionally upheld by the media and legislatively backed by the political elite, shares the new Programming Director of BNT Mrs. Shishmanova (Sevda Shishmanova, interview 27.01.2011). This occurred apparently in the last ten years and coincided with the launch of the private operators and the protection of their interests. The first myth ascribed to BNT portrays the broadcaster as a state television, censored and biased, that receives funds from the state budget and, thus, serves each state authority regardless of political colour. This, respectively, creates an automatic alternative that the private television channels are independent, uncensored and corrective of the ruling power. However, the nationwide research, conducted by Market Links about the behaviour of the Bulgarian media in a situation before, during and after elections shows that with the shift of government private media are those that are subordinated to the political conjuncture, while public media firmly maintain their objective position (Sevda Shishmanova, interview 27.01.2011). This study of the national elections debunks the myth by indicating that the public broadcasters BNT and BNR are leaders in terms of institutional trust.

5.2.1 The amount of state subsidies - sufficient or not?

On the European political level, the notion of funding has been fully embraced, contending that Member States have a duty to ensure and maintain an appropriate and secure basis of funding for public broadcasters to carry out their tasks and public undertakings (Council of Europe 2006). Thus, within its own budgetary constraints, the Bulgarian government should seek to make available levels of public funding sufficient to enable BNT to achieve its public service remit.
As the major component of BNT’s financial structure, the state subsidies allocated to the public broadcaster have been steadily growing through the years (Figure 5.1). In 2001, when the first commercial operator in the country was licensed, BNT received a state subsidy of BGN 33 million (EUR 16,8 million), which in 2008 reached the amount of BGN 81, 8 (EUR 41,8 million). The total annual grant of BGN 81,8 million subsumed, respectively, a subsidy of BGN 57, 8 million (EUR 29,6 million) for the production of television programming, an expedient subsidy of BGN 9 million and an additional subvention of BGN 15 million (EUR 7,7 mill.) for the coverage of current payments to the Bulgarian Telecommunications Company (BTC) and for the payment of royalties on various copyrighted materials including sports programmes among others (Ministry of Finance 2008a: 70-71). Even though the figures (till 2008 included) paint an increased government funding, analyses and financial audits show that the bare minimum requirements for ensuring the overall activity of BNT have in parallel increased over the years and are in the order of BGN

24 The exchange rate has a fixed value of EUR 1 = BGN 1,9558
85 million due to alterations in the economic and pricing policies in the country (Report of BNT 2007-2010: 60). In congruence with the funding mode laid down in the LRT, the difference to the total annual budget should be ensured by internally generated revenue obtained primarily from selling advertising time (sections 5.3; 5.4).

From 2009 onwards, however, the state grants started decreasing, and BNT got stuck in dire financial straits with a budget deficit of several million BGN. The severe global economic recession, triggered by the collapse of the sub-prime mortgage market in the US urged the Bulgarian government to take forceful actions. BNT was, subsequently, faced with budgetary cutbacks already in 2009. The state budget projected a subsidy of BGN 76.8 million, including BGN 8.1 million for long-term assets, whereof only 90 percent were granted to BNT. Later in the course of the year, BNT received an additional subvention of BGN 5.08 million (Ministry of Finance 2009: 120). In the year of 2010, however, the amount of government subsidies was abated with entire 17 percent, and reached the lowest funding level for a public broadcaster in Europe, BGN 60.1 million (approx. EUR 31 million). Although the European broadcasters depicted in the Figure 5.2 have different sources of funding (licence fee, state subsidies, mixed funding), the figure aims to stress on the extreme contrast between their disposable incomes.

![Figure 5.2 Financing of European public broadcasters](image-url)

Figure 5.2 Financing of European public broadcasters
The Bulgarian public broadcaster found itself on the verge of financial insolvency. There are two key reasons. First, there was the reduced amount of subsidy, while prices of goods and services, sports rights, copyrights, etc. significantly increased (Ognian Zlatev, Member of the Management Board of BNT, interview 24.01.2011). Second is the reduced advertising revenue, discussed in the following section (see 5.3). Compelled to survive, BNT could not afford to meet the expenses of investing, and this, in turn, would result in that the development of the broadcaster would be set back by years, Mrs. Uliana Prumova, who was, at the time, serving out her second tenure as the Director General of BNT stated in a press release (Nenova 2011). Concerned about the considerably reduced subsidy of BNT, on 11 January 2010, the European Broadcasting Union (EBU) sent a letter to the chairman of the National Assembly, entreating the government to revise the budget of BNT, as this would have implications for the cause of public broadcasting in Europe (ibid.).

5.2.2 State grants per hour of output

The volume of state subvention granted to the Bulgarian National Television is determined on the basis of the average programme production cost per hour, approved annually by the Council of Ministers. The amount of subsidy is further allotted to BNT’s six independent channels: the generalist channel BNT1, the satellite channel BNT World and the regional television channels BNT Sea (БНТ Море), BNT Plovdiv (БНТ Пловдив), BNT Pirin (БНТ Пирин) and BNT North (БНТ Север)\(^{25}\). In recent years, as the world recession was impetuously advancing in most spheres of the economic vivacity in the country, the executive authority, as previously witnessed, considerably reduced the subsidy. On the other hand, however, the programming time in quantitative aspect has increased (Table 5.3). The four regional centres of BNT that used to broadcast four hours of programming daily, now air an eight-hour daily programme each. Similarly, the satellite channel has doubled its programming duration, increasing the broadcasting time from twelve to twenty-four hours (Table

\(^{25}\) The four regional television centres of the towns of Varna, Plovdiv, Blagoevgrad and Rousse were founded in the early 1970s as regional branches of, at the time, the state broadcaster Bulgarian Television. Later, in the dawn of democratisation, the centres established their own television channels that provide local programmes and news coverage in the concerned areas.
5.3).

Table 5.3 The channels of BNT: characteristics

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<tr>
<th>CHANNEL</th>
<th>COVERAGE</th>
<th>PROGRAMME HOURS PER DAY</th>
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<td>2007</td>
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<td>Channel1 (BNT1)</td>
<td>National</td>
<td>24</td>
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<tr>
<td>BNT World</td>
<td>International</td>
<td>12</td>
</tr>
<tr>
<td>TV Sea</td>
<td>Regional</td>
<td>4</td>
</tr>
<tr>
<td>TV Plovdiv</td>
<td>Regional</td>
<td>4</td>
</tr>
<tr>
<td>TV Pirin</td>
<td>Regional</td>
<td>4</td>
</tr>
<tr>
<td>TV North</td>
<td>Regional</td>
<td>4</td>
</tr>
</tbody>
</table>

Thus, whilst the institution of BNT in 2007 broadcasted a total of 52 hours of programming, in 2010 it broadcasts 28 additional hours of programming, which amounts to a total of 80 hours daily. In sum, while in 2007 the government granted a subsidy for the production of national and regional programmes estimated to BGN 2951 (approx. EUR 1508) for an hour of output, in 2010, where an increase of 53.8 percent in the number of broadcasted hours is present, the amount of subsidy per programming hour comes up to BGN 1978 (EUR 1011) (Chamber of Accounts 2008; Memorandum BNT 2010). Moreover, there exists an invariable constant on the expenditure side, namely, BNT’s obligation to the Bulgarian Telecommunications Company, now the Bulgarian telecom Vivacom\(^{26}\), for the transmission of signal. The public broadcaster has accumulated debt to Vivacom of roughly BGN 13,5 million included interest after a decision to suspend payment in August 2009 (Antonova 2010).

We could look at how an hour of programming was estimated at BGN 2500, conditionally speaking, but now it costs even more, while the relative amount of the subsidy remaining, that is to be spend on the production of programmes,

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\(^{26}\) In 2004, the Bulgarian government sold 65 percent of the BTC capital to a subsidiary of the US private equity fund Advent International. A year later, BTC was granted a licence for the development of a third-generation mobile telecommunication system, and launched its mobile services under the Vivatel brand. In 2009, BTC announced the merger with its subsidiary, namely, BTC and Vivatel united in a new brand- Vivacom.
In absolute figures, there is a progressive decline in the financial resources granted for the production of programmes, whereas evident is the increase in the price of licences, copyright fees, production expenses etc (Ognian Zlatev, interview 24.01.2011). Admittedly, BNT has been positioned in a vicious circle that is likely to have implications for the quality and diversity of BNT’s content platform. Moreover, BNT’s annual reports and the financial audits conducted by the Chamber of Accounts, bespeak that maintenance costs 27 constitute the largest piece of BNT’s annual expenses, amounting to BGN 41.7 million in 2009, and BGN 32.3 million in 2010. Second is the amount allocated to staff wages, respectively BGN 19.4 million in 2009, and BGN 18.6 million in 2010. Bearing in mind the amount of state subvention, these figures do suggest that the least amount of resources is allocated for the production of content, when it should be the opposite. The current chairman of CEM commented on the prevailing lack of prosperity, as the overall programme output of BNT and its ratings are underrated in the structure of the media (Antonova 2010). The meagre investments in programming output do suggest that the public broadcaster is likely to rely more on foreign imports that are reasonable in price than a high-cost in-house production.

On the legislative level, the financial norm for an hour of programming, regardless of programming type, is looked upon as not quite an appropriately considered standard for determining the state subsidy of BNT and BNR, argues Associate Professor Raina Nikolova (Focus Information Agency 2010). Then again, it concerns the funding of creative organisations, loaded with special public responsibilities, whose activities cannot be subjected to similar average criterion. The various programming categories cannot just be reduced to a common denominator, as the diverse programme types imply different levels of financial resources. Many years ago, it has been attempted to place that issue in the focus of attention:

We were working on a project that evoked a storm of negative public response, mostly by the members of the Council for Electronic Media. I personally was addressed as “information gendarmerie” by the then chairman of CEM when we brought out the data. We endeavoured to make a calculation of how much the production of one programming minute of public function

27 This includes expenses on external services (transmission of signal), business trips, current repairs, outsourcing, supplies etc.
costs in order to be able to assess whether the subsidy granted to BNT is adequate at all. Whether it is sufficient or far too much for the responsibilities it carries out (…) The attempt to find out how the pricing was formed, turned out very difficult (…) (Assya Kavrakova, interview 21.01.2011)

Correspondingly, a detailed report of the public broadcaster conducted by the Chamber of Accounts showed that there does not exist adopted uniform rules and criteria that specify the principles and the method for determining the cost of an hour of output (Chamber of Accounts 2008: 6). It is not identified neither on what basis and which costs are taken into consideration nor whether the formation of its value recognises the structure of the television programme (in-house, commissioned, reruns). Consequently, the norm for an hour of programming content cannot be regarded as a real measure to evaluate the management of funds in the budget of BNT, the report concluded. The mechanisms for its calculation need to be updated so that they correspond to the dynamics of the rapidly changing television sector in the country.

5.2.3 Disbursement of state subvention

While the 1997 Amsterdam Protocol provides Member States with the freedom to choose the means of financing their public service broadcasters, the European Commission does require that public service media carry out the function entrusted to them by the Member States in a transparent and accountable manner, avoiding abuse of public funding for reasons of political or economic expediency (Official Journal of the European Union 2009/ C 257/01). The funding of public broadcasting should respect the principle of proportionality, implying that public funding should be used solely for fulfilling the public service remit, and when a public service broadcaster is involved in purely commercial activities and, accordingly, receives funding from sources other than the public sector, it must keep separate accounts (European Commission 1998, referred to in Papathanassopoulos 2007: 158). To avoid cross-subsidisation of non-public service activities, the Commission invites Member states to consider a clear and appropriate separation of accounts. In the case of the Bulgarian public broadcaster, however, this appears to be an issue of concern:

Within the institution of BNT, the two streams of income, the sources coming from the state subvention and those accrued from performing commercial
activities, are virtually not separated, and it is not clear how they are disbursed in terms of content production. (…) We have repeatedly raised the question about the purposeful spending of the state subsidy. How will this medium verify that the sources it receives from the taxpayer are actually used for fulfilling its public service mission (…) (Assya Kavrakova, interview 21.01.2011)

The Bulgarian National Television is indeed subjected to financial audits by the Chamber of Accounts. The audit office, however, looks at the legitimate spending side of the funding sources, and does not account for the expediency of the expenditure. This is due to the audit authorities’ lack of mandate for assessing whether the expenditure of the capital is proportionate to the public service responsibilities assigned to the broadcaster (Assya Kavrakova, interview 21.01.2011). The annual reports of BNT overtly illustrate that the separation of accounts poses no particular problem on the revenue side, as they provide a detailed account of the amount of all income accrued. On the cost side, however, the absence of such separation is at stake.

The European Commission does recognise that the separation of accounts may be more difficult on the cost side as the public service and commercial activities may to a large extent share the same inputs and the cost may not always be severable in the proportionate manner (Official Journal of the European Union 2009/ C 257/01, Art.65). The so called proportionality test existing in the European Union, to see how the expenses concur with the public service activities of the operator, have never been carried out in Bulgaria. The growing interest in the broadcasting sector on part of the EU Commission, which polices market competition, with a special eye to illicit forms of state support, places BNT in a vulnerable position. If BNT cannot verify that the disbursement of the state subsidy is allocated for the fulfilment of its public service remit, it could be by all rules qualified as state aid that in line with the Community legislation, affects competition in the common market in a disproportionate manner.

5.3 Internally generated income

When facing serious financial pressure as the cost of production and inflation keep rising, each broadcaster with mixed funding would most likely step up its internal revenue generation. Hence, in response to the declining government support, the
Bulgarian public broadcaster is expected to increase its own income. This has not been, however, a feasible task for reasons of advertising restrictions, managerial inefficiency and the deepening financial crisis. It seems that in 2009 and 2010 the management efforts have been mainly directed to cut costs in lieu of focusing on the real issue - the low profits (Figure 5.4). In 2007, BNT has generated revenues\(^{28}\) of BGN 11.8 million that are mainly through advertising, sponsorship, sale of programming content and technical services, and services from BNT’s recreation facilities. The public broadcaster generates income also from other commercial sources such as teleshopping, paid reportages, and compensation trading, that comply with BNT’s specified terms and tariff rates. In 2008, spurred by the imposed initiative among the commercial channels to countervail the expected sharp drop in revenue, the Marketing Department reduced the advertising prices by 30 percent as means to attract advertisers by providing more appealing conditions (Report of BNT 2008-2009: 56). The net amount of internally generated income, accordingly, went down to BGN 8.63 million.

![Figure 5.4 Internally generated income (BLUE: real income, RED: projected income)](image)


\(^{28}\) BNT’s total revenue amounts to BGN 18.5 million after The National Revenue Agency (NRA) reimbursed BNT BGN 6.7 million for overpaid taxes and penalties (Chamber of Accounts 2008: 3).

\(^{29}\) The figures embrace all territory branches, where the commercial revenue from the regional channels is very insignificant.
The tendency of diminishing revenue kept going throughout both 2009 and 2010. The reported revenues for BNT in 2009 amounted to BGN 6, 65 million. Weighed against the income of BGN 15,5 million projected in the State Budget Law of the Republic of Bulgaria for 2009, there is a failure by 57.1 percent, which is mainly due to the small advertising revenue. In the subsequent 2010, however, the public broadcaster ends the budgetary year with a deficit of BGN 35 million (Antonova 2010). The analysis of the financial state of BNT, conducted by its new management in August 2010, revealed that the preceding management team have done a pretty rough accounting trick. BNT’s budget for 2010 was set up based on expected but completely unrealistic revenue. When computing that the reduced state subvention could not cover their expenditure, the former management board inscribed in the budgetary draft an expected revenue of BGN 27,5 million, which is estimated to a growth of 400 percent in commercial time sales. This is an absurd managerial decision, incongruous with the market logic under conditions of financial hardship, accompanied by market recession, where each organisation is supposed to take some actions (e.g. restructuring, expenditure cutbacks, redundancy etc). So, instead of BGN 27,5 million, the public broadcaster generated a revenue of BGN 5, 1 million, which constitutes a failure of 83.65 percent. In figure 5.4, however, the real annual income generated from commercial activities, does not render an account of the going rate of general inflation. Taking that into account, the decrease in internally generated income is even more severe.

Thus, in august 2010 the new management took over the BNT in complete financial collapse. Touching upon this issue, the majority of the interviewees commented that this is not necessarily horrific as the severe crisis may turn out to be the irrevocable argument for the long-delayed reform within the media.

5.4 Advertising

As state subsidy constitutes BNT’s main source of funding, the advertising income remains secondary. The following section draws attention particularly to the scope and appropriation of advertising within the public service broadcaster.
5.4.1 Advertising restrictions

Another myth regarding BNT that has been subject to speculation, argues Shishmanova, concerns the fact that since BNT is spending taxpayers’ money, it should be bound to manoeuvre within this framework and should not be entitled to any market behaviour:

Nobody explains that the same taxpayers also provide for the private media through calculated advertising in the price of each item they purchase (...) It is contended that regarding BNT everything is handed on a silver platter, while private broadcasters have to generate income on their own and fight for advertising revenue. The general public, however, circumvent the fact that when founding the private television sector, with few successive decisions the advertising stream was diverted towards the private channels with restrictions to BNT (Sevda Shishmanova, interview)

BNT has the right to generate income from selling advertising time. It is, however, subjected to legal restrictions in terms of quantity, frequency and placement, specified in the Law on Radio and Television. Pursuant to Articles 89 and 90 of the broadcasting act, BNT is permitted up to 15 minutes of advertising time daily. The commercial operators, on the other hand, are allowed to sell advertising time amounting to 15 percent of their daily programming duration, which comes out at 3,6 hours (216 minutes). The public broadcaster is further restricted to broadcast up to 4 minutes of advertising per clock hour, and up to 6 minutes for its regional channels, as opposed to a quota of 12 minutes granted to commercial operators. The advertising restrictions imposed to BNT become, however, invalid in cases when programmes of national and international significance are broadcasted, in particular programmes of the realm of culture, art and sport. Then, the television advertising restrictions of 12 minutes per clock hour imposed by the Audiovisual Media Service Directive (AVMSD) are in force.

In line with the market logic, the pursuit of economic goals is, in principle, best reflected during peak-viewing hours. The special role of prime time results from the time-use patterns of the audience, which strongly concentrates TV viewing on a few evening hours. As the audience peak is, in a way, readily at hand, prime time has become the main arena for competition between broadcasters providing the most
attractive programme mix, which revolves around the exchange of audiences for advertising revenue. In this lucrative time interval, however, the Bulgarian public broadcaster is restricted to one third of its total advertising time. Succinctly put, while BNT can broadcast only 5 minutes of advertising time between 19.00-22.00, commercial broadcasters, that enjoy a broad prime time (18.00-23.00), are allowed to broadcast 12 minutes of advertising time per clock hour, which amounts to a total of 60 minutes. BNT’s programming director argues that even if this is acknowledged as a necessary protectionist policy of the state to private media, in order to offset the postponed formation of the television industry in the country, this can no longer be tolerated (Sevda Shishamanova, interview). She considers it a political lobbying for private television and rude political management of economic processes:

Due to the upcoming digitalisation, the television broadcasting market is in a state of dynamic development. Large investments are concerned, and this suggests that the commercial operators will become more aggressive in their request to remain alone in the advertising market (...) In a situation of economic crisis and abated state subsidy, I continue claiming that BNT should be given the opportunity to earn its own money to invest in content (...) and by that I mean to obviate the advertising restrictions in prime time. I have no illusions that BNT will be granted more advertising time than what is allowed now, but at least be given the opportunity for product placement not only in in-house film production, but also in commissioned programmes (Sevda Shishamanova, interview)

Although BNT has, for a long time now, entreated CEM for more advertising time, local media scholars argue that public media are the only eligible media institutions for the citizens because they are a place where, at least by concept, public rather than private interests reign (Angelova 2008: 45). The restriction on advertising is not a repressive measure, but a measure to ascertain that there still exist areas in the public sphere that are not conquered by commercial pursuits.

30 With the enactment of the Law on Radio and Television, a paradox occurred: till the licensing of the first national private television broadcaster, BNT was banned from selling advertising time between 19.00 and 22.00. Advertising was kept at bay. This unusual norm perplexed the foreigner observers, as explanations for its existence were nowhere to be found, neither in the legal nor in the financial logic (Tscholakov 2000; Ivanova 2005). The commercial operators, on the other hand, were allowed a lot of advertising time due to the significance of the advertising income for their financing.
5.4.2 BNT’s advertising policy and commercial activity

By and large, the global economic crisis has affected all spheres of economic life in the country, which is expressed in the deterioration of the overall market conjuncture and the shrinking of the advertising market. According to the research agency TV Plan /TNS, the reported decline for 2009 in gross values is estimated to 20 percent. The factual downturn in net values, however, is assessed to 28 percent (Piero 97, 2010). This downward drift had strong repercussions especially on the public broadcaster’s proceeds from selling advertising time. In the second quarter of 2009, the advertising revenue has dropped by 46 percent compared to 2008, while in the third quarter it went even further down by 64 percent (Report of BNT 2009: 6). This led to limiting the possibility of additional revenues for the broadcaster. In 2009, BNT aired a total of 27 hours of advertising, which amounts to a fulfilment of 29.6 percent of its optimal annual advertising time. As a result of the new market situation all media were obliged to take prompt protective action aiming to retain their market shares. This is reflected in significantly reduced prices for advertising time in the leading private national television channels, that in addition, offer a huge range of different package deals and various attractive offers for their customers, not present in the fixed advertising tariffs of BNT. The public broadcaster had no choice but to take adequate market behaviour, that consistent with the current market trends, resulted in updating of its advertising policy.

On September 23, 2009, a new method (‘Guaranteed rating”) was introduced for selling advertising time whose monetary value is determined on the audience of each programme. As a well-established worldwide practice, also applied by all commercial operators in Bulgaria, it allows differentiation of the programming content and gives advertisers a real guarantee of achieving the desired results from their advertising campaigns. The change in the method of selling advertising time was a logical consequence of the analysis of employment of the advertising slots during the period of march-august in 2009. BNT filled an average of 19.37 percent of the advertising blocks, which is extremely low juxtaposed to an average of 54.73 percent for 2008 (Report of BNT 2007-2010: 57). The aim was to fully infuse fresh funds in the budget of the broadcaster. The change in the method, however, entailed adjustments of the price levels that, in turn, led to an average decrease of 80 percent in certain time zones, especially in the evening programme hours. By and large, this
method signalled BNT’s ushering in of a new phase of development where the public broadcaster perceived behaviour closer to the market and its requirements.

BNT conforms to the television ratings figures provided by the audience research monopolist \(^{31}\) in Bulgaria. According to market surveys, from the various audience segments BNT guarantees ratings for the target groups 25-54 and 45+ (Emilia Vasileva, Ratings Section at the Marketing Department of BNT, interview 26.01.2011), and, accordingly, sets prices for 30-second advertising spots. Basically, the rating-based method of selling advertising time is based upon what is referred to as cost-per-rating point (CPP). This cost of reaching one percent of the target audience within a specified geographic area is calculated when dividing the advertising price by the rating. As CPP is in inverse proportion to ratings, advertisers are interested in advertising at lower CPPs (Maria Donkova, Head of Sales at the Marketing Department of BNT, interview 26.01.2011).

By and large, the change in the method of selling advertising time was logically followed by a more adequate sale of the advertising time that BNT has at its disposal. In 2010, the public service operator has broadcasted 76 hours of advertising, which amounts to a fulfilment of 83 percent in terms of its total advertising time. A large portion of these advertising hours, however, have resulted from the adverts in relation to the 2010 Winter Olympics and the Football World Cup 2010, where BNT was allowed advertising time of 12 minutes per clock hour in the interval of covering the events. BNT, otherwise, showed an advertising fulfilment of approximately 30 percent.

### 5.4.3 BNT- a pawn on the advertising chessboard

Despite the rise of new communication technologies, the television industry has retained its dominant position as the preferred medium for advertising investments. In 2009 and 2010, 62.7 and 65 percent of the gross advertising budgets respectively, have been invested in the realm of television broadcasting (Piero 97 (2010); Piero 97

\(^{31}\) In Bulgaria, until recently there were two major players that offer monitoring of audience viewership of the programmes (people-meters), TNS/TV Plan and GFK Audience Research Bulgaria (GARB). For years, this has created tension in the market. Not only significant differences were often observed but both agencies used two different methods of work, forcing ad agencies to buy data from both companies to ensure that they properly plan their budgets. In December 2010, however, the long-awaited merger happened.
Contrary to all expectations, the market for television advertising has grown by about 3 percent. The latest market survey (Piero 97, 2010), accordingly, provides evidence for the advertisers’ propensity for safe investments, indicating that at the height of the financial crisis 90 percent of the advertising budgets of the leading advertisers are spent in the national TV channels (ibid.). The overview of the TV advertising budgets depicted in Figure 5.5 below, clearly illustrates BNT’s small market share compared to its commercial rivals.

The data indicate that the commercial broadcaster BTV has undoubtedly taken the lead in drawing the largest amount of advertising proceeds, followed by Nova TV. It is interesting to point out, thereby, that the majority of the other channels 32 having considerable advertising income are from the portfolio of BTV Media Group, that is part of the vertically integrated media company Central European Media Enterprises (CEM), and some are in possession of the Swedish media company Modern Times Group (MTG). The advertising revenues are, consequently, concentrated in the hands

32 BTV, BTV Comedy, BTV Cinema, BTV Action, RING.BG represent BTV Media Group, whereas Nova TV, Diema, Diema Family, Nova Sport, Nova Play, KinoNova belong to Central European Media Enterprises,
of these two leading foreign companies, leaving small slices of the advertising pie to the other market players. As it seems, the public broadcaster appears as a pawn on the market chessboard, and although it shows certain advertising growth (Figure 5.5), it is, however, insignificant. Since 2009 the trend for price reduction and ‘squeezing’ of more and more abatements has continued in full force. In the long run, advertisers will look for more precise targeting at lower prices, and this will, in turn, lead to increasing intensification of the struggle within the television market. The new team at the Marketing Department of BNT does recognise the importance of advertising income for the public broadcaster, and, thus, endeavours to be in tune with the surroundings and the market mechanisms at large:

We look at BTV, Nova TV, and we try to be in the middle. This is our life motive because we can neither reach the high ratings of BTV nor attain to the prices of Nova TV, which has lower prices than us. So, we attempt to position ourselves in between. This is our landmark in terms of price setting. (Maria Donkova, interview 26.01.2011)

In general, commercial operations are a matter of active communication with the customers and efficient decision-making. The latter, however, is hampered by the cumbersome bureaucracy existing within the institution of BNT, communicated her anxieties the head of Advertising and Sponsorship Section, Maria Donkova. Instead of being more customer-oriented and respond immediately to the needs of the advertisers, the marketing activities of BNT are, in every respect, subordinated to the approval of the Management Board. A feasible solution, proposed Donkova, is the Marketing Department to be designed as a separate unit that would respond more adequate to the market forces at hand.
6. The Programming Domain

After giving careful consideration to the financial arrangements of the public broadcaster in the foregoing chapter, the following analysis will draw attention to its programme content. First, the chapter will examine the programming policy terrain in the effort to outline how the public service broadcaster is regulated to foster the public nature and distinctiveness of programmes. This subsection will, accordingly, delineate the broadcaster’s explicit principles and aims of programming, and endeavour to assess how BNT fulfils its mandate and entrusted mission. Based on a systematic quantitative analysis of programme schedules, BNT’s programme output will subsequently be brought into focus. Aiming to strengthen or disprove the assumption on BNT’s readjustment dictated by the imperatives of marked logic, I study the programme configuration in regard to the structural diversity of the programme provision. The supply is mainly studied in terms of programme categories, sources and origin of programmes, as they are regarded key indicators of BNT’s programming philosophy.

6.1 The remit of the Bulgarian public service broadcaster

The use of the public service concept on the ideal plane is less common today than in the early 1980s, when with the liberalisation of the airwaves the discussion of public service broadcasting entered a new era. The dissolution of the monopolies instigated a wave of changes in the course of which many of the requirements that the monopoly status entailed lost relevance (Søndergaard 1999). The notion of public service has undergone ‘modernisation’, argues Søndergaard (ibid.: 24), and, thus, has changed character in such a way that it is hardly intelligible unless one takes into consideration the conditions under which the media operates. Once considered as an alternative to the market, the public service broadcasting, today, is becoming more embedded in the market economy and tends increasingly to be regarded in market economic terms. Some criteria previously perceived intrinsic to the concept of PSB, such as public ownership and licence fee financing, no longer necessarily apply, as convergence trends, mixed funding and the emergence of hybrid channels have made it difficult to discern between public service and commercial broadcasting. Instead, public service
broadcasting is now nearly solely defined in terms of programme policy commitments.

In the context of programming tenets, the public service remit of BNT is laid down in the Law on Radio and Television, where the broadcasting institution of BNT is defined (Article 6) as “a national public provider of audio-visual media content”. As such, the programming guidelines stipulated in the law are based on the assumptions that the programming orthodoxy of BNT will, among other things, provide a wide range of programmes for all citizens of the Republic of Bulgaria regardless of ethnicity, provide access to national and European cultural heritage. Besides, BNT should also encourage the development and popularisation of Bulgarian traditions and language, as well as reflect various ideas and convictions within society, by ensuring a plurality of viewpoints etc. Hence, the public service remit of BNT is described in very generic terms. These requirements, what is more, seem rather imprecise considering that they can be fulfilled not only by the public institution, but by its purely commercial rivals as well.

It’s also interesting to notice that the public broadcaster is additionally obliged, upon request, immediately and free of charge, to provide programme time for official announcements of representatives of the State bodies in case of calamities or direct threats to the life, security and health of the public or individual persons. By resolution of the National Assembly, BNT is further obliged to provide programme time, free of charge, for direct broadcasting of plenary sessions of the Parliament, aiming to enable publicity and transparency of the activities of the National Assembly. This right is very often exercised, but hardly enjoys high audience interest (Open Society Institute 2005). It makes the programme schedule very difficult and burden the budget of the public broadcaster, shows the EU monitoring report from 2005 (ibid.: 384). Considered extremely tedious by the viewers, the plenary broadcasts attract very low audience share, which private broadcasters driven by revenue-maximising incentives are unlikely to ever consent to.

33 Article 52 of the LRT stipulates that the President of the Republic, the Chairman of the National Assembly, the Prime-Minister, the Chief Prosecutor and the Chairmen of the Constitutional Court, the Supreme Administrative Court and the Supreme Court of Cassation have the right of address on the public broadcaster.
6.1.1 Steering by programme licence - quantitative content requirements

The remit of the BNT is further elaborated in terms of programme strands and quantifiable dimensions in the broadcaster’s programme licence issued by the Council for Electronic Media. The introduction of the programme quotas, that BNT is subjected to, is mainly considered an extension of the BNT legislative transformation into public service media. This programming regulation came about in 2001 by means of thorough specifications in BNT’s statute concerning the public service duties it is obliged to live up to. Moreover, these extensive arrangements have partially to do with changed conditions for the public service broadcasters operating in market-based media systems, where the necessity to document the value of public service channels assumes importance (Søndergaard 2006: 56). Thus, the Bulgarian public broadcaster has the legal obligation to broadcast:

- News - no less than 5.1 percent of the daily programme time, wherein no less than 15.6 percent of the entire news programme time should be dedicated to regional news and no less than 0.7 percent of the news should be accompanied by a translation for people with impaired hearing;
- Current affairs programmes – no less than 16.6 percent of the weekly programme time;
- Educational programmes – no less than 3.7 percent of the weekly programme time;
- Cultural, scientific and religious programmes – no less than 4.7 percent of the weekly programme time;
- Programmes for children and youth – no less than 7.6 percent of the weekly programme time;
- Programmes in support of the integration of socially disadvantaged and risk groups – no less than 1.8 percent of the monthly programme time;
- Programmes for Bulgarian citizens whose mother tongue is not Bulgarian – no less than 0.3 percent of the annual programme time;
- European and Bulgarian production – no less than 74.9 percent annually, wherein the Bulgarian production must be no less than 43.5 percent;
- In-house production – no less than 36.7 percent of the annual programme time;
- Production from independent producers – no less than 10 percent;
- Additional programme requirements – news in Turkish language;
- Additional services – TELETEXT.

In today’s multichannel market-oriented media economy where compelling financial considerations and commercial populism go hand in hand, the quantitative content obligations imposed on BNT aim to retrench public broadcaster’s freedom of manoeuvre. They tend to steer the programming output towards satisfying the terms
of the licence and debar BNT from undermining its public service vocation. It can be questioned whether such approach is desirable since it can restrict the necessary freedom and flexibility of PSB to adapt to new programme strategies (Betzel 2007: 150). The requirements to broadcast a minimum percentage of programmes belonging to a certain genre imply that the programming profile of the public operator is expected to stringently and clearly differ from the commercial broadcasters. At first glance, therefore, the aforementioned provisions would seem to provide the requirements necessary to justify BNT’s public service status. However, a comparison between the programme obligations envisaged in the programme licences of the three main national television broadcasters reveals an interesting matter (Figure 6.1).

Figure 6.1 Programme obligations of BNT, BTV and Nova TV, inscribed in their programme licences

Figure 6.1 shows overwhelming similarities in the programme parameters of the public broadcaster and the two main commercial operators. If, for instance, the television operators were not designated by name, it would have been rather difficult to distinguish the public service broadcaster, as they have very similar responsibilities in terms of thematic programmes and quotas. As a condition for obtaining a programme licence, the content requirements of the broadcasters are approved as the operators have set for themselves. Surprisingly, however, in their applications for licensing, both BTV and Nova TV committed themselves to higher quotas for news and educational programmes than BNT. Nova TV also has higher responsibilities than the public broadcaster with respect to cultural, scientific and religious programmes, as well as programmes for minorities and risk groups, and for Bulgarian citizens whose mother tongue is not Bulgarian (shortened to non-BG in Figure 6.1). The remit emphasises that PSB is entitled to broadcast programmes that are also offered by commercial operators. In this respect, in terms of public service function, assuming that the only criterion is the licence and the programme quotas, there is no significant difference between the three national operators. The pressing question, however, is how they are being implemented.

6.1.2 How does BNT perform?

As part of the government’s media policy, the programming quotas relate more directly to the proper role of the public service media in the media system. One central point is that they not only have a more binding character by setting out in detail goals and criteria that the institutions shall fulfil, but also call for closer steering and policing of the company’s activities on the part of the state. The institution of BNT, accordingly, is required to draw up an annual ‘balance sheet’ that verifies its compliance with the imposed requirements. The public broadcaster has developed

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34 When the first contest for national television was held in 1998, the criteria were made so as to ensure the dualism in the TV spectrum. BTV, accordingly, came closest to these requirements. In the beginning the operator offered serious journalism and cultural programmes of high quality. After replacing the NRTC by CEM, for political reasons the new regulator with a light hand started to change the parameters set by the broadcasters. The meaning with regulation is that broadcasters themselves determine the programme objectives and the regulator makes certain that they comply with them (Ivo Dragonov, interview, 18.01.2011). The TV operators have, however, the right to change the parameters of the licence. This happens mainly with programmes that require special preparation, cause reflection and lay claims to the intellectual level of the viewer. As far as the second
internal monitoring mechanisms to ensure that its programmes meet the obligations specified in its programme licence (Ani Sokleva, interview). The reports on its programme parameters for 2009 and 2010 submitted to the CEM and the Ministry of Finance are depicted in Figure 6.2. The graph indicates that the Bulgarian public broadcaster meets its programme demands in a rather satisfactory manner. BNT not only demonstrates determination to achieve the explicit programme goals, but also exceeds the imposed minimum percentage requirements in most of the categories.

![Graph](image)

**Figure 6.2** Fulfilment of the programme quota requirements (Source: Internal reports)

As far as the commercial TV operator is concerned, the regulatory body had no requirements of Nova TV to carry any public service responsibilities.
In 2009, BNT reported well-fulfilled programming obligations with the only exception of a lesser percentage than required of programmes for socially disadvantaged and risk groups, namely 1.5 percent of the least possible amount of 1.8 percent. The programming balance sheet for 2010, however, attests to certain degree of volatility in meeting the explicit objectives. The variability in the execution of the content requirements is a consequence of the changes brought about by the new administration of BNT. When it took over in August 2010, the new administration carried out a programme analysis of the overall state of the programming department. The evaluation of the programme output showed that a number of programmes do not meet the criteria for European public broadcasters regarding among other things quality of content, implementation, social significance, rating parameters, market value and assessment of the work of the programming teams (Sevda Shishmanova, interview). The programmes that did not live up to the standards were taken off the air, others were kept after alteration in their programming concept. The cut-offs are most evident in the programmes for children and youth, and the risk and minority groups (Report of BNT, Aug. 2010 -Jan. 2011: 7). The analysis revealed a deficit of recreational production, new genre forms and formats designed for children and young audiences, and an significant shortage of output for the audience of 18-34 and the wider category of 18-49. In order to rectify this insufficiency, the management board initiated a contest for both commissioned productions and cross-media projects in the respective underprovided categories (Ordinance Nr. 144, 2010).

In line with the programme cut-offs, Figure 6.2 indicates a slight drop in some content quotas, wherein the programmes for socially disadvantaged and risk groups are subjected to even further decrease compared to 2009. The four socially oriented programmes broadcasted by BNT were transformed into a weekly social project titled *Short Stories*. Each weekday through a documentary narrative a human story is presented, uncovering pressing social issues and the problems of the most vulnerable groups in the society, such as people with disabilities, children at risk, lone parents, people suffering from addictions, people with violated rights, ethnic minorities etc. Searching for a solution, live on Saturday, *Short Stories* provides an arena for fervent public debate over the issues touched upon throughout the week by equipollent involving of media, non-governmental sector and various institutions. Opposed to the decline in some quota output, Figure 6.2 reveals slight enhancement in the
percentages for news, current affairs, European production and independent programme supply. The increase is due to new programmes and seasonal projects that the new programming department of BNT has embarked on.

By and large, the overall data presented in Figure 6.2 inform that the public broadcaster does meet the quantifiable programme parameters it is expected to achieve. The similarities in the programme quotas of the public and the two major commercial broadcasters, further, call attention to assessing the performance of the commercial operators as well. I was unfortunately not granted access to information of similar nature for other channels, as data related to the private sector was available for internal use only. This is regrettable since such sources would be of valuable character for drawing more nuanced inferences in how BNT justifies its public service status. Positing that CEM is responsible for assessing and regulating the output of the nationwide television broadcasters, I assume that the major commercial operators, BTV and Nova TV, fulfil their mandate with respect to their programme requirements even though their transmission schedules point into another direction (Section 6.2.4).

Besides, Søndergaard (2006: 57) stresses the existing risk that the detailed requirements of the public service media may degenerate into rigid quotas that will subvert the idea of public service while placing the broadcasters in a programme political jacket that seriously impedes their further development. As Søndergaard underscores, the British regulator, Ofcom, appears to have recognised the problem and admonishes against programme quotas in favour of regulation defined in terms of PSB actual purposes and characteristics, so that it has the freedom to respond to the challenge of providing accessible and popular programming (ibid.: 57).

6.2 The programme domain: the general pattern of programming

Challenging the idea of how exactly BNT fulfils its public service remit, in the foregoing section, BNT’s programme output will be put into perspective. The programme schedules are perhaps the area of BNT’s activity that best reveals the programming philosophy of the broadcaster, and provide insightful evidence for assessing which paradigm of programming (commercial or public service) is tightening its grip on BNT’s programme offerings. The analysis of the programme provision will rivet attention to the programme structure and measure how the various
programme categories are apportioned throughout the day/different time segments. I seek to examine how PSB’s core criteria of universality and diversity are manifested in the programming profile of BNT. Examining a week-long schedules of 2009, 2010 and 2011 aims at investigating where the public operator is heading for: whether it has preserved the citizenship oriented values of the public service broadcasting ethos or, rather, shows symptoms of general ‘commercialisation’ of its output in response to the dominant market ideology of recent decades. The subsequent analysis of the programme types presented in the transmission schedules of BNT attempts to reveal where the scales tilt in the programme content of the Bulgarian public broadcaster.

6.2.1 Morning programming provision - distribution of programme types

Table 6.3 presents data drawn from the morning programme offerings of BNT according to the programme genres discussed in section 4.3.3. Being administrated by the same management team, and, therefore, subordinated to the same programming policy, the figures for 2009 and 2010 are somewhat identical. The data clearly show that informative programmes dominate the morning programme content (35,3% for 2009, and 34,2% for 2010), followed by children’s programmes (13,9%; 13,6%), fiction (11,7%; 9,7%), and entertainment (8,8%, 10,9%). Current affairs, arts programmes, and music, are low priority, whereas educational and sports programmes are not present at all. However, in assessing the sum of the categories closely identified with the public service functions of broadcasting, the data reveal that these genres represent 63 percent (2009) and 59,2 percent (2010) of the morning programming on BNT, while popular programming accounts for no more than 20,5 percent and 20,6 percent.
### Table 6.3. Morning programme output of BNT

<table>
<thead>
<tr>
<th>Programme</th>
<th>2009 min</th>
<th>2009 %</th>
<th>2010 min</th>
<th>2010 %</th>
<th>2011 min</th>
<th>2011 %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informative prog.</td>
<td>815</td>
<td>35,3</td>
<td>790</td>
<td>34,2</td>
<td>1008</td>
<td>43,6</td>
</tr>
<tr>
<td>Current affairs</td>
<td>135</td>
<td>5,8</td>
<td>130</td>
<td>5,6</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Human stories</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>60</td>
<td>2,6</td>
</tr>
<tr>
<td>Arts prog.</td>
<td>131</td>
<td>5,7</td>
<td>134</td>
<td>5,8</td>
<td>305</td>
<td>13,2</td>
</tr>
<tr>
<td>Educational prog.</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Sports prog.</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fiction</td>
<td>270</td>
<td>11,7</td>
<td>225</td>
<td>9,7</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Entertainment</td>
<td>204</td>
<td>8,8</td>
<td>254</td>
<td>10,9</td>
<td>275</td>
<td>12</td>
</tr>
<tr>
<td>Musical prog.</td>
<td>52</td>
<td>2,3</td>
<td>-</td>
<td>-</td>
<td>57</td>
<td>2,5</td>
</tr>
<tr>
<td>Children’s prog.</td>
<td>320</td>
<td>13,9</td>
<td>313</td>
<td>13,6</td>
<td>386</td>
<td>16,7</td>
</tr>
</tbody>
</table>

The morning bloc *The Day Begins* features every morning throughout the weekdays, followed by the programme *Health* that through various rubrics discusses the copious spectre of health themes – diseases and treatments, folk medicine, health insurance, novelties and worldwide medical achievements etc. The morning schedule continues with the American television soap opera *The Bold and the Beautiful* that has been on air since 1993. It is then followed by the talk show *The Women*, discussing the issues of the fair sex, breaking ‘male’ clichés, protecting and strengthening women’s position in the modern world. The early morning output of the weekend is, on the other hand, entirely directed towards the young audience, offering children’s short movies, animation, the in- house programmes *To Animals with love* about the flora and fauna, *Cool-* for the youth between eight and thirteen, *13+ -* a popular rubric for adolescents where a group of young ambitious reporters seeks answers to everything that revolves in the teenager’s mind. The rest of the morning programme content is devoted to arts and entertainment programmes, whereof *The Unknown Earth -*archaeological documentary production, the historical programme *Memory Bulgarian* and the religious production *Faith and Society* constitute the arts.
programme type. The morning weekend entertainment is presented by *All in Front of the Screen*, introducing audience to the upcoming week’s programming offerings by acquainting them with the hosts’ personal life, experiences and fears on the screen and behind the scenes, and the cultural-informative talk show *On Sunday with* that continues to the early afternoon.

However, as the data in table 6.3 show, in 2011 the share of ‘serious’ programme categories has considerably increased. The Bulgarian national operator allocates no more than 12 percent of its morning broadcast time to popular programming, and as much as 78,6 percent for informative genres. The most prioritised programme areas during the weekdays are, namely, information (43,6 %) and arts (13,2%). In addition to conceptual alterations in certain broadcasts, an overall transformation of the morning bloc is evident, separating the territory for politics and culture, along with news headlines. The cultural module changes the presentation style of artistic and art events, and through interactivity and BNT’s rich network of correspondents offers current issues of the cultural life both in the country and around the globe (Sevda Shishmanova, interview 27.01.2011). The children’s programmes (16,7%) in the weekend have gained an absolute advantage over the other programme categories, supported by BNT’s new TV format *Phenomena*. Looking for hidden acting talents that master dancing, singing and instrument playing, *Phenomena* is a musical contest for children, where the award is a participation in the children’s musical Peter Pan, and an opportunity to be found and brought into the spotlight the future stars of stage and screen.

### 6.2.2 Daytime programme offerings

Proceeding to follow the programming profile of the public broadcaster, the daytime output of BNT (12.00-18.00) indicates a wide variety of programme types. As table 6.4 reveals, in 2009 and 2010 BNT distributed its supply relatively evenly across the ten programme types. Top categories included show and entertainment (16,5% in 2009; 15,8% in 2010), news and informative programmes (12,3% in 2009; 13,2% in 2010), fiction (12,3%; 11,9%), education and science (9,3% in 2009; 13,9% in 2010). Children’s programmes too (8,6%; 5,6%), as well as music (6,9%; 7,2%), were given a moderate share in the daytime schedule, whereas other categories had a more
The share of informative genre presented by newscasts, National lottery draw, the agricultural programme *Furrow*, news in Turkish language, as well as news bulletin for deaf and hearing impaired, seemed less prioritised at the expense of fiction and general entertainment. The afternoon portion of the talk show *On Sunday with*, the culinary programme *Delicious*, the educational game show *A Minute is Much*, and the scientific show *Famelab* that search for young talented scientists, constitutes the entertainment category. BNT has also devoted a considerable share of the daytime output to educational supply. This includes various documentaries and popular science, as well as different programmes: the educational magazine format *Are you in class* elaborates on how schoolbooks treat various spheres of science aiming to provoke and enrich knowledge, raise interest and stimulate creativity, *Atlas* has for 42 years been introducing viewers to the world of nature, the geographical sights and riddles, expeditions and adventures. It also includes *My Language* and *The Great Break*, both devoted to the Bulgarian mother tongue, *The Library* a book-based programme that in 2010 by extending its thematic range was transformed into a

<table>
<thead>
<tr>
<th></th>
<th>2009</th>
<th></th>
<th>2010</th>
<th></th>
<th>2011</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>min</td>
<td>%</td>
<td>min</td>
<td>%</td>
<td>min</td>
<td>%</td>
</tr>
<tr>
<td>Informative prog.</td>
<td>311</td>
<td>12,3</td>
<td>333</td>
<td>13,2</td>
<td>337</td>
<td>13,4</td>
</tr>
<tr>
<td>Current affairs</td>
<td>91</td>
<td>3,6</td>
<td>68</td>
<td>2,7</td>
<td>74</td>
<td>2,9</td>
</tr>
<tr>
<td>Human stories</td>
<td>70</td>
<td>2,8</td>
<td>100</td>
<td>4</td>
<td>78</td>
<td>3,1</td>
</tr>
<tr>
<td>Arts prog.</td>
<td>98</td>
<td>3,9</td>
<td>78</td>
<td>3,1</td>
<td>192</td>
<td>7,6</td>
</tr>
<tr>
<td>Educational prog.</td>
<td>235</td>
<td>9,3</td>
<td>351</td>
<td>13,9</td>
<td>401</td>
<td>16</td>
</tr>
<tr>
<td>Sports prog.</td>
<td>168</td>
<td>6,6</td>
<td>108</td>
<td>4,3</td>
<td>37</td>
<td>1,5</td>
</tr>
<tr>
<td>Fiction</td>
<td>310</td>
<td>12,3</td>
<td>300</td>
<td>11,9</td>
<td>670</td>
<td>26,2</td>
</tr>
<tr>
<td>Entertainment</td>
<td>415</td>
<td>16,5</td>
<td>398</td>
<td>15,8</td>
<td>197</td>
<td>7,8</td>
</tr>
<tr>
<td>Musical prog.</td>
<td>175</td>
<td>6,9</td>
<td>182</td>
<td>7,2</td>
<td>57</td>
<td>2,3</td>
</tr>
<tr>
<td>Children’s prog.</td>
<td>216</td>
<td>8,6</td>
<td>140</td>
<td>5,6</td>
<td>186</td>
<td>7,4</td>
</tr>
</tbody>
</table>

Table 6.4 Daily programme output of the public broadcaster
cultural production (Report of BNT 2009-2010: 29). Musical programmes accentuating on folklore (*Folklore, Here Comes the Native Music*), convenient for noon and afternoon broadcasts, seemed favoured by the broadcaster.

The ongoing reform of the public broadcaster, however, has hitherto brought about considerably moderate shifts in the daytime programming structure. Despite the launch of several modern productions, the figures for 2011 reveal general decrease in the share of many of the programme types, perhaps only temporarily, whereof music and sports suffered the most. Interestingly, however, fiction has unprecedentedly taken the lead, doubling in share (26,2), at the expense of entertainment programmes whose share is severely diminishing from 16,5 percent in 2009 to 7,8 percent in 2011. Indeed, fiction (26,2%), education (16%) and news & informative programmes (13,4%) are the winners of the reallocation, showing the most significant increase. Although the combined share of ‘serious’ programme types still has the upper hand in BNT’s daytime provision (47,4% in 2009; 49,7% in 2010; 52,7% in 2011), the share of popular programming tends to take a stronger stake, shifting between 35,4 percent (2009) to 32 percent (2011) to 35,5 percent again (2011). The data summarised in table 6.4 bear witness to the potential growing reliance on ‘less demanding’ programmes. Besides, approaching the evening programme module, generally considered being the most revealing of programming practices, it would be particularly interesting to explore how this tendency unfolds in the peak viewing hours.

**6.2.3 Programming emphases at the evening viewing hours**

The evening programme segment, and more precisely prime time, is considered a built-in property of television, resulting from and being reproduced through the practices adopted by both the viewers and the television broadcasters (Hellman & Sauri 1994: 62). Hence, in the sense of Giddens, the peak viewing hours have become a set of rules that constrain both the programme mix and viewing behaviour (Giddens 1979: 59-76, referred in Hellman and Sauri 1994: 63). Due to the structuring effect of prime time, television operators seem to compile their programme output for peak viewing hours concentrating predominantly on the lucrative and strategically important popular programming categories. As to the viewers, they are taught to expect a certain programme mix as a natural part of the TV evening.
Analysis of the evening programme structure of BNT (Table 6.5) reveals that the fairly great share of popular categories detected in the daytime schedule is even more favoured in the peak viewing hours. By and large, in 2009 and 2010, three categories, fiction, news, and entertainment, had substantial portions of the airtime. Coinciding with the expectations, the principle winner is the fiction genre, enjoying a share of 25.3 percent (2009) and 30.4 percent (2010) of the evening viewing hours. It is closely followed by news and information (15.1%; 20.5%) and entertainment (23.3%; 12.8%). Sports programmes (12.3%; 6.9%) maintain a fairly moderate percentage while the rest of the categories have less than 6 percent each of the remaining time.

<table>
<thead>
<tr>
<th>Category</th>
<th>2009 min</th>
<th>2009 %</th>
<th>2010 min</th>
<th>2010 %</th>
<th>2011 min</th>
<th>2011 %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Informative prog.</td>
<td>443</td>
<td>15.1</td>
<td>602</td>
<td>20.5</td>
<td>559</td>
<td>19.0</td>
</tr>
<tr>
<td>Current affairs</td>
<td>120</td>
<td>4.1</td>
<td>169</td>
<td>5.8</td>
<td>145</td>
<td>4.9</td>
</tr>
<tr>
<td>Human stories</td>
<td>50</td>
<td>1.7</td>
<td>60</td>
<td>2.0</td>
<td>50</td>
<td>1.7</td>
</tr>
<tr>
<td>Arts prog.</td>
<td>67</td>
<td>2.3</td>
<td>130</td>
<td>4.4</td>
<td>161</td>
<td>5.5</td>
</tr>
<tr>
<td>Educational prog.</td>
<td>144</td>
<td>4.9</td>
<td>87</td>
<td>3.0</td>
<td>54</td>
<td>1.8</td>
</tr>
<tr>
<td>Sports prog.</td>
<td>362</td>
<td>12.3</td>
<td>204</td>
<td>6.9</td>
<td>369</td>
<td>12.6</td>
</tr>
<tr>
<td>Fiction</td>
<td>744</td>
<td>25.3</td>
<td>893</td>
<td>30.4</td>
<td>653</td>
<td>22.2</td>
</tr>
<tr>
<td>Entertainment</td>
<td>686</td>
<td>23.3</td>
<td>377</td>
<td>12.8</td>
<td>549</td>
<td>18.7</td>
</tr>
<tr>
<td>Musical prog.</td>
<td>90</td>
<td>3.1</td>
<td>170</td>
<td>5.8</td>
<td>204</td>
<td>6.9</td>
</tr>
<tr>
<td>Children’s prog.</td>
<td>50</td>
<td>1.7</td>
<td>70</td>
<td>2.4</td>
<td>90</td>
<td>3.1</td>
</tr>
</tbody>
</table>

Table 6.5 Evening programme output of BNT

Looking at the programme distribution, the transmission schedules reveal that while fiction and news are evenly allocated across the evening structure, other programme categories have a more imbalanced distribution. Setting aside the supernumerary programmes involving the Eurovision Song Contest, the entertainment programmes are predominating in the weekend, consisting of the Saturday night show *The Show of the Channel* presenting the week’s events through the distorted humoristic mirror; the talk show *Night Birds* presenting its guests - the most popular personalities in all spheres of science, art, sports etc. - in different and unusual light;
the life style show *Elite* introducing the world of show business, and the programme *Flight Over the Night* that every Friday night through interesting topics and interactive connection unites the Bulgarians abroad. Moreover, in 2010, BNT also broadcasts the second season of the successful political reality *The Big Choice*, where after a round of auditions, presenting solution to a cause that each candidate advocates for, the selected twelve finalists undergo a kind of ‘political school’ in the competition for becoming a young political leader. Current affairs programmes (*Referendum* and *Panorama*), on the other hand, along with live coverage of sports championships and tournaments, are positioned at the hearth of the peak viewing hours, whereas in-house sports programmes (*Third Half-time, Motosport Extra*) and musical programmes (*In front of the altar of opera, Jazz line, Classical concert*) are situated in the late night programme segment.

Drawing comparisons with the data gathered from 2009 and 2010, BNT’s evening output in 2011 shows an overall stability in the distribution of programmes across the various programme categories. Although succumbed to fluctuations, Figure 6.5 indicates that the fiction category has maintained the top programme category position with a share of 22,2 percent, followed by a share of 19 percent allotted to news and informative programmes. Suffering a large decline in 2010, the entertainment programme type, has now taken an increased stake of 18,7 percent, adding to its offerings the weekdays’ late night show *Denis and Friends* - an hour reserved for life style, amusement and music, and the new political reality programme *The Promise*, which draws public attention to the sensitive part of the political life, concerning whether politicians fulfil the promises they give. Ten top Bulgarian politicians commit themselves to a cause, and BNT, in an attractive manner, follows how they keep their word. In the research period in 2011, the evenings programme *Good Night, Children* favoured by the youngest audience, has been partly replaced by the new seasonal project *The Little Big Read* that is a continuation and an adaptation of BBC’s *Big Read* format, but directed to children’s literature.

In short, the combined share of serious programmes, showed moderate increase in the evening offerings of BNT, from 32,9 percent in 2009 to 42,9 percent in 2011. Despite the growth in informative output, the share of popular programme types maintains a predominant position in the peak viewing programming supply, amounting to 61, 6% in 2009, 50,1% in 2010, and 53,5% in 2011. The preponderance
of sport, fiction and light entertainment do indicate that BNT has not escaped the commercial logic that reigns in the new era of competitive television. The data lend support to the assumption that the Bulgarian public broadcaster is coming to resemble commercial television. This, furthermore, suggests some degree of resemblance between the programming of BNT and its commercial rivals.

6.2.4 Commercial television versus PSB

In order to substantiate whether the public broadcaster mimics the commercial operators’ approach to programming, a general comparison of output by programme genre can help reveal the similarities between them. Table 6.6 presents a week of programming provision of the public BNT and the two main private operators, BTV and Nova TV. A quick glance at the data shows that the public service broadcaster provides a broad mix of programme categories, as opposed to the commercial operators that supply a slightly more focused approach to programming. Recalling the fact that the three broadcasters showed pretty similar requirements in terms of programme parameters (Section 6.1.1), it is interesting to notice that the weight of informative programming on the schedule of BNT (56.7%) is superior to that of the commercial BTV and Nova TV, 23.5 percent and 24.7 percent respectively. The data clearly shows that the public broadcaster provides a public service programme structure, with news (24.5%), arts programmes (8.5%), children’s programmes (8.5%), educational (5.9%) performing as its focal area of programming. However, fiction (16.9%) and sport (5.2%), as well as entertainment (13.1%), pertaining to the popular programming, also belong firmly in its programming domain.
Table 6.6 A week-long programme output of BNT, BTV, and Nova TV (2011)

<table>
<thead>
<tr>
<th>Programme Type</th>
<th>BNT</th>
<th></th>
<th>BTV</th>
<th></th>
<th>NOVA TV</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>min</td>
<td>%</td>
<td>min</td>
<td>%</td>
<td>min</td>
<td>%</td>
</tr>
<tr>
<td>Informative prog.</td>
<td>1904</td>
<td>24,5</td>
<td>1365</td>
<td>17,6</td>
<td>1270</td>
<td>16,4</td>
</tr>
<tr>
<td>Current affairs</td>
<td>219</td>
<td>2,8</td>
<td>200</td>
<td>2,6</td>
<td>185</td>
<td>2,4</td>
</tr>
<tr>
<td>Human stories</td>
<td>188</td>
<td>2,4</td>
<td>-</td>
<td>-</td>
<td>43</td>
<td>0,5</td>
</tr>
<tr>
<td>Arts prog.</td>
<td>658</td>
<td>8,5</td>
<td>-</td>
<td>-</td>
<td>58</td>
<td>0,7</td>
</tr>
<tr>
<td>Educational prog.</td>
<td>455</td>
<td>5,9</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Sports prog.</td>
<td>406</td>
<td>5,2</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fiction</td>
<td>1313</td>
<td>16,9</td>
<td>3024</td>
<td>38,9</td>
<td>2150</td>
<td>27,7</td>
</tr>
<tr>
<td>Entertainment</td>
<td>1021</td>
<td>13,1</td>
<td>1613</td>
<td>20,8</td>
<td>2295</td>
<td>29,5</td>
</tr>
<tr>
<td>Musical prog.</td>
<td>318</td>
<td>4,1</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Children’s prog.</td>
<td>662</td>
<td>8,5</td>
<td>260</td>
<td>3,3</td>
<td>367</td>
<td>4,7</td>
</tr>
</tbody>
</table>

On the private channels, the programming strategies are fairly different, although the data in table 6.6 hint at slight points of convergence. Both operators offer a heavy diet of movies, series and serials, whereof BTV shows an absolute superiority with a proportion of 38,9 percent over Nova TV’s share of 27,7 percent. On Nova TV, however, entertainment performs as the most commonly supplied category amounting to 29,5 percent of the offerings, although its share on the rival channel, BTV, does not lag far behind (20,8%). The news & informative programmes category, is also highly favoured by the private operators, with a share of 17,6 percent for BTV, and 16,4 percent for Nova TV. Nevertheless, the commercial channels allot small shares of their programming to current affairs and children’s programmes, whereas human stories, arts programmes, educational productions, sport, and music are either greatly neglected or make no showings at all. Although the programming domain of the commercial operators differs, showing that popular programmes are part of the principal menu of the channels, it also bears some resemblances to the public service paradigm of programming. Even if they are not designated as hybrid channels, in some respects, BTV and Nova TV seem as such. In spite of the great number of
fiction and entertainment programmes, their shares of the overall output remain considerably moderate due to the narrowcast media existing in their portfolios. Thus, the operators’ niche channels are wholly devoted to one particular popular programme type (e.g. movies, series and serials, sport). Although the three broadcasters tend to emphasise popular categories during peak time, the structuring effect of prime time falls harder on commercial channels. As far as the public service broadcaster is concerned, the avid competition for ratings has also induced BNT to greatly favour the popular programme categories.

6.3 Sources and origin of programmes

Still, other tendencies towards a closer alignment of the programme content with the imperatives of commercial ideology are to be found in the sources of production and the geographical origin of the programmes. In this context, the following section, studies the allocation of the different production sources (in-house, independent production, collaboration) on BNT’s programme supply, as well as their country of origin (domestic and foreign).

6.3.1 BNT’s programming supply

The Bulgarian public service operator broadcasted both local and foreign programmes within the period of study. Local programmes incorporated in-house productions, independent productions and co-productions. In-house programmes refer here to production carried out on the BNT’s initiative, produced by its own services, either by the generalist channel BNT1 or its regional television centres, and under its editorial responsibility. Independent productions, on the other hand, are programme output produced by organisations or individuals outside the administrative and creative control of BNT, which do not qualify as either commissioned projects or as collaboration between BNT and external production service. Co-productions refer to joint undertakings between the public broadcaster and another party that imply co-financing, provision of production resources and/or editorial content. Due to the various monetary relationship schemes, the commissioned programmes are here classified as co-productions although they may in some respects be ranked with the independent productions. Likewise, many of the programmes produced and televised by the public service broadcaster are classified as local productions even though some of their content may stem from foreign sources. Given that each broadcast is counted
as one programme, any foreign material used is reckoned part of a domestic production. Foreign programmes, on the contrary, refer to broadcasts both produced and packaged outside the Bulgarian borderlines. Figures 6.7, 6.8 and 6.9 present the programme sources of BNT’s programme supply on the basis of the ten-category classification.

![Figure 6.7 Programmes by production source in BNT’s schedule of 2009](image1)

![Figure 6.8 Programme sources in BNT’s transmission schedule of 2010](image2)
In general, in-house programmes predominate in BNT’s offerings, accounting for an increasing share of the analysed broadcast time (50.9% in 2009; 51.3% in 2010; 56.4% in 2011). The breakdown of output distinctly shows that the in-house programme supply has just about a total dominance in three categories - news, current affairs and human stories- and a clear superiority in arts and musical programmes. The former has resulted from article 47 in the LRT, stipulating that newscasts and current affairs programmes of political and economic themes broadcasted on the public channels could only be produced internally. This clause has been criticised by European experts and media scholars for limiting editorial independence. Explanation to BNT’s supremacy in the latter lays in the fact that independents need to make up for production and airtime cost. This, therefore, makes them less interested in programmes that have low sponsor appeal, such as productions targeted at the more defined tastes of smaller audiences (e.g. arts and music programmes).

Indeed, independent productions have a robust presence in the mass-appeal programmes. Broadcasts from independent producers take up more than 60 percent of the sports programme supply presenting live coverage of sports events and achievements that BNT usually acquires the transmission rights for. Moreover, in the fiction genre, the share of independent production shows an overwhelming
preponderance, amounting to over 80 percent of the time allotted to movies, serials and series (83.4% in 2009; 86.3% in 2011). In 2010, its share even reaches 100 percent, which does not truly reflect BNT’s legal commitment to allocate a minimum of 10 percent of the state subvention to Bulgarian television film production (Art. 71, Par. 2 in LRT). The small share of in-house film provision comprises mainly of production emanating from the ample archive that BNT has accumulated since its inception. A notable exception is to be seen in the week schedule of 2011 when BNT broadcasts the first season of its newest film production, the modern criminal serial Undercover, created as a response to the wave of domestically produced serials. Captivating the interest of overseas distributors, for the first time a television serial of small marked such as Bulgaria enters the catalogue of a global company with distribution rights worldwide (Union of Bulgarian Journalists 2011). As far as the entertainment programmes are concerned, the large share (58.5% in 2009) allotted to independent suppliers has suffered a drastic decline (21.9% in 2011) to the benefit of in-house sources and co-productions, in particular. The children’s programme category is also highly supplied with external productions of foremost foreign origin. This is due to BNT’s participation in the children’s drama series project initiated by the European Broadcasting Union that rests on the principle of free exchange of short high-quality narrations (Ani Sokleeva, interview 21.01.2011).

Apart from these prevailing production sources, the data collected also display a rising tendency towards collaborative undertakings. This propensity to embark more on co-productions is primarily manifested in the entertainment programme types, children’s and educational programmes. Figure 6.9 irrefutably shows the predominance of co-productions in the show and entertainment category, whose share increased from 15.5 percent (2009) to 43.1 percent (2011). The choice of collaborative projects is truly dictated by the opportunity provided by such partnerships in terms of sharing the programme production load. Thus, by contributing to the development of local programme production, co-productions offer a better way to respond to the financial challenges that BNT is faced with.

6.3.2 Domestic vs. foreign programmes

Drawing emphasis on the distinction between public and commercial channels, earlier empirical research on international programme flow shows that public broadcasters
provide a broader assortment of programmes in terms of country of origin than their commercial rivals. The private operators, consequently, tend to rely heavily on US import (De Bens & De Smaele 2001). The origin of programmes on BNT’s programme schedules is presented in Figures 6.10, 6.11 and 6.12.

Figure 6.10 The origin of programmes in BNT’s transmission schedule of 2009

Figure 6.11 BNT’s programme output of 2010 in terms of origin
Figure 6.12 Origin of BNT’s programme supply in 2011

The figures show indubitably the predominance of national content on BNT’s output during the research period and its great weight in the overall programming mix. Devoting more than two-thirds of the programming supply to domestic production, the data emphasise BNT’s prime investment in Bulgarian content. Interestingly, the share of domestic programmes seems to have strengthened its predominance, increasing its stake from 65,7 percent in 2009 to 75, 8 percent in 2011. Furthermore, programmes originating from European countries are the second biggest source of programming, maintaining its established 16 to 21 percent stake of the programme supply. While the domestic pole was primarily composed of news, current affairs programmes, arts and entertainment programmes, the highest flow of European productions came from the children’s programmes category, serials and series, documentaries and educational provision. The principal sources of European programming were France and Italy, followed by the United Kingdom, Germany and Spain.

In contrast to commercial channels whose programme output is predominantly subordinated to the dominant American programme industry, BNT appeared less reliant on US imports. The increased share of domestic production has resulted in the failure of programming of American origin. The figures reveal a strong drop in the share of US imports. Their stake dropped from 12,9 percent in 2009 to 7,4 percent in 2010, to reaching the trifling share of 4,2 percent in 2011. Thus, as the US programming accounted for a dramatically decreasing share of BNT’s offerings, other
foreign produced material demonstrated relative growth (1,5% in 2009; 5,4% in 2010; 3,9% in 2011). BNT tends to broadcast programmes produced by countries from other continents such as Japan, Korea, Canada, Brazil, African countries.
7. Funding and ‘ecology’ \(^{35}\) side by side - overall discussion and conclusion

7.1 The media regulation policy at the forefront

The policy initiatives manifested in the 1998 Law on Radio and Television, a long-awaited piece of legislation, came to represent a significant landmark in the media system in Bulgaria. As a public policy meant to respond to the distinctive characteristics of, and inimitable issues posed by, mass-mediated communications (Freedman 2008:5), the national media law draws up a range of legally sanctioned tools designed to shape the structure and conduct of the broadcasting sector. The media policy has taken account of broadcasters’ inherent status as cultural institutions, serving the political and cultural needs of the society in unique fashion, while at the same time considered their contribution “as industry at key nodes in the nation’s economic fabric” (Golding 1998: 10). Moreover, intended to advance and strengthen the fundamental tenets of democracy, the LRT attests to the PSB advocates’ vocal enthusiasm for its merits and for the BNT as a public service institution. Hence, the provisions of LRT highlight policy objectives that put emphasis on the fostering and disciplining of public service broadcasting, specifying, inter alia, two crucial determinants- funding and mission. The examination of BNT’s financial and programming properties has shown that there certainly is a correlation between policy and practice. This, accordingly, expresses the underlying belief that explicit policies are a requirement for a well functioning public service broadcaster.

7.1.1 Dual funding - a mixed blessing

The approbated dual funding of the Bulgarian National Television indicates the initial willingness of the politicians to establish an appropriate and secure funding framework for nurturing a public service broadcaster. However, where the balance should be struck between public funds and commercial revenue is an important consideration that goes to the heart of what constitutes PSB. When reconciled to the ideological principles of public service broadcasting, the very idea of selling

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\(^{35}\) In the UK at least, the programme production sector is often referred to as ‘ecology’ (Armstrong 2005: 287). This rests on the assumption that like some delicate natural habitat,
audiences is quite problematic as the pursuit of economic goals diverges from the PSB ethos. Advertising is considered inherently antagonistic to the programme diversity, privileging entertainment programming and its related production values, rather than the democracy-serving functions of information provision. In the case of BNT, however, pursuing funds through commercial mechanisms is seen more as a supplement to the insufficient state subvention than a purely economic incentive. In fact, the advertising restrictions imposed on BNT bespeak a protectionist policy approach. The legal assent to compete for audiences, although within very strict limits, is, contrariwise, construed as a corrective measure on behalf of the commercial broadcasting, which reflected the aspirations for a pluralistic media system.

Despite the menace that state grants pose on the independence of BNT, the introduction of licence fee as a projected form of public funding, was long condemned to failure. Thus, the state subvention, although unstable, becomes a way of determining the survival of the public broadcaster. The governmental subsidy is meant to enable BNT to devote fully to fulfilling its mandate of public service and not getting sidetracked under the pretext of generating commercial income. Public funds should from the outset withhold BNT from competition for the commercial revenue. However, in a media environment that is highly profit-driven and less oriented towards cultural and political objectives, the quest for commercial profit, and that in competition with the copiousness of commercial channels leads to a battle for the viewers and stimulates convergence (De Bens 1998: 35). Nonetheless, due to the advertising constraints, compounded by the uncompromising global financial crisis, advertising revenue has not taken on a prominent role in BNT overall income. The revenue generated through commercial proceeds turned out rather scant (fulfilment of just about 30 percent of the optimal time allowed), as advertisers seemed to favour the dominant commercial channels, where the predominance of popular programme offerings enjoys a large audience base.

7.1.2 Programming orthodoxy

By and large, the ad-based income may not be that hazardous to the PSB philosophy as anticipated, inasmuch as it does not override the public service obligations of the broadcaster. As the Protocol on public broadcasting annexed to the Amsterdam Treaty careful protection is needed to ensure its continued existence.
stresses, it is the prerogative of the member states to define and adapt the public service broadcasting remit to their own national needs. BNT, accordingly, appears properly tethered to the public service principles, both through legal and contractual agreement. Grounded in cultural and national development objectives and recognising that the public service broadcaster can greatly contribute towards these aspirations, BNT’s policy regulation entails detailed content stipulations and quota prescriptions. They provide BNT with guidance on how to meet broad national objectives while at the same time reflect the ethnic diversity of Bulgarian society. The broadcasting legislation, addressing in clear details the distinct purposes of public service broadcasting, opts for an all-embracing PSB approach. The objective of Bulgarian broadcasting policy coincides with the common aims of media policy, that is, to ensure the supply of diverse and high-quality programming that serves all interests and communities (Armstrong 2005: 287).

Acknowledging the significance that PSB is endowed with, the Bulgarian National Television is subjected to means of intervention, monitoring and control that befit its status as pivotal agent of social meaning. The LRT encourages programmes that yield social benefits, contribute to mutual tolerance and awareness of the citizens’ regional and national identity. It could be seen that the range of licence conditions governing BNT’s content programme include programme categories, which are likely to have a relatively low demand and high production costs. The programmes in these categories are chiefly aimed at specific target groups and important minorities in the society (e.g. children, ethnical minorities, people with impaired hearing etc). For these reasons, both market failure and welfare arguments can be used to justify the regulation of programme content, particularly when the profit-driven private operators prove strongly averse to deliver certain kinds of ‘desirable’ programmes (Doyle 1998: 24; Robinson et al. 2005). As the output analysis of the commercial channels BTV and Nova TV confirmed, the mercantile broadcasting market fails to achieve such socially desirable outcomes, which, in turn, shows that the public intervention in the programming of BNT is highly required. Besides, protectionist requirements have been set most stringently on ensuring that adequate in-house produced content is supplied, and that the domestic ecology of programme production is protected (Armstrong 2005).
7.2 The interplay at hand

The various methods and schemes of funding, and the accompanying pressures put on broadcasters, clearly influence the kind of programmes channels make. Generally, the advertising funding signifies the “frantic search for audience-maximising formulae” (Blumler 1992a: 30), which, in turn, pertains to the highly entertainment-oriented programming. Public funding, on the other hand, suggests that broadcasters have to supply a schedule of programmes, which are sufficiently valued to justify its legitimacy and, not least, public funds. As programme output is closely tied to the funding mode, the components of BNT’s financial structure - government subventions and commercial sources - show their relative merits.

7.2.1 Full portfolio programming supply - yes, please!

More precisely, the analysis of the funding scheme of BNT showed dwindling and insufficient state funding, incongruous to the growing programme production costs. With that at hand, the dependence on advertising, although restricted, leaves the broadcaster open and particularly vulnerable to commercial interests. Likewise, the ‘Guaranteed rating’ advertisement sales method that BNT adopted in 2009 further empowers the public operator to be closer and more attentive to the market and its requirements. Contrary to the initial assumption, however, the worrying traits of commercialism engendered by advertising income did not thoroughly apply to the context of BNT. The public service broadcaster has, thus, not got sucked into the whirlpool of market imperatives. The content analysis of the BNT schedules confirms that the broadcaster has not betrayed and abandoned its mandated responsibilities.

Although stuck in dire financial straits in times governed by multichannel market-oriented economy, BNT provides a fully comprehensive service, offering a broad mix of programme categories. The overall findings clearly indicate that BNT has developed and maintained programme output catering for the large majority of citizens while being attentive to the needs of minority groups. Hence, BNT is not a niche channel, referred often as providing programming merely filling the gaps neglected by the profit-maximising broadcasters (Blumler 1992a: 21; Collins et al. 2001:8). The Bulgarian public channel epitomises a full-scale portfolio model, supplying a broad range of content, and more specifically, with informative and children’s programmes, culture and education as its core area of programming.
Recalling the vital principles underpinning the PSB philosophy, BNT endeavours to achieve what Collins et al. termed ‘audience universality’, that is attained through diversity of audience and programme content (Collins et al. 2001: 8). By supplying a genuine mix of programme offerings comprising of high social-value genres, popular mass-appeal programmes and minority- tailored (the merit goods) programming, BNT caters for the wide array of interests and needs of its national audience, irrespective of their geographical location and social position.

The analysis of the programming output, however, did show a relatively great share of the examined broadcast time devoted to popular programme categories (fiction, entertainment, sport). At first sight, especially in prime time, it might appear that the forces of commercialisation compounded by the fervent battle for audience have got their hooks into the programming domain of BNT. Closely related to the unending profit-seeking incentives of the market mechanism, these programme strands cannot appear to fulfil the democratic, social and cultural needs of the society. Neither can they ensure media access to economically marginal populations. Seemingly, the vigorous presence of popular programming, generally supports the assumption of programming resemblance between the public broadcaster and commercial television. Although literally true, popular programmes are here seen, rather, as mere tools for sustaining an overall broad-ranging schedule, with a suitable balance of different programme types. As BBC notes, in recent years, this necessarily eclectic view of PSB is still plausible in defining the edifice of public service, providing drama, comedy, soaps just as much (even more) as news, current affairs, arts and religion (BBC 2004, quoted in Jakubowicz 2006: 13).

Nevertheless, the study illustrates that, in 2011, the popular programmes have slightly increased their stake in the daily- and evening offerings of BNT. This may rationally be construed as a response on the part of BNT to the growing marketplace pressures, whose future growth may perhaps prompt greater convergence towards the commercial model of broadcasting. As Hellman notices, both Syvertsen (1997) and Søndergaard (1994) have detected in their respective studies that the rising rivalry does not necessarily lead to change in the size distribution of programming across categories (Syvertsen 1997: 232-233; Søndergaard 1994: 186, quoted in Hellman 1999: 320). As they underscore, the overall equilibrium of programme types can be sustained by rearranging them in a more competitive fashion. In the context of the
Bulgarian public broadcaster, the increased share of popular programming in prime time has followed from rescheduling the programme supply, diverting principal programmes, of both social and economic interest, towards peak viewing hours. This does not necessarily entail that commercial advertising drag broadcasting more in the direction of amusement and triviality than focusing on social and cultural development. Notwithstanding the structural reshuffle of BNT’s programme output, the combined share of popular categories has additionally dropped from 40,7 percent (2009) to 35,3 percent (2011), to the benefit of quality informative programming that shows slight increase, respectively growing from 53,4 percent in 2009 to 56,7 percent in 2011.

7.2.2 Distinctiveness and diversity

As a vital institution aimed at enhancing and nourishing a social, political and cultural citizenship, public service broadcasting is expected to be more distinctive from commercial competitors in terms of programme content. Its distinctiveness is, in this respect, chiefly regarded as a consequence of the scope and nature of the assigned programming tasks. As presented in chapter 6, the juxtaposition of the programme obligations of BNT and the two leading commercial operators revealed overwhelming similarities with reference to their respective content parameters, which raises concerns about BNT’s PSB status and visions. Yet, it can be observed that the range of programmes offered by the public broadcaster is considerably more varied than its commercial counterparts, carrying more current affairs, musical, educational and arts programmes. Offering a wide range of selection and choice to the multiplicity of tastes and needs of the individual audience members, BNT proficiently fulfils a mission clearly different from that pursued by the single-minded market entrepreneurs. Moreover, the programme categories are more broadly represented and more evenly distributed in the programme schedules of BNT than those of the commercial stations, which further highlights BNT’s valuable contribution to the general diversity of programming.

Although BNT has been dragged into the competition battle, it certainly continues to hold on to more programme diversity both in programming strands and range of themes. The content analyses revealed that BNT embraces a multiplicity of topics and fields of science, such as politics, archaeology, history, religion, medicine,
agriculture, culinary art, literature, life style, folklore, cinema etc. BNT provides programmes that stand out among the competing offerings of private channels. The prevailing commercial output, characterised by similar reality formats, homogeneous serials and identical content platform automatically opens up a niche for an alternative programme product, notifies BNT’s programming director. This, however, does not imply a recipe, as Blumler (1993: 408) points out, “for boxing public television into a worthy but boring and elitist corner, concentrating only on hard programme material”.

Alternative supply, underscores Shishmanova, is here considered in terms of quality of production, professional standard and interestingness:

The development of television broadcasting as an industry, especially public service television, is heading towards absorbing everything of the commercial TV formatting that appeals and arouses curiosity. And this is where the public broadcasting institutions have their supremacy. They can utilise the commercial forms, but introduce a different content that only they have the professional standards and commitment to create. (Sevda Shishmanova, interview)

BNT makes use of the wave of reality formats in the realisation of programming content intrinsic to its public service mission. It tracks attractive formats, transforms them, and creates modern productions of social utility addressing the large public (Boyko Stankushev, interview 27.01.2011). For that matter, BNT strives to implement the modern European tendencies of merging public and commercial content, providing a wide variety of genres and content, quality of production, seasonal projects and long-term predictability of the program schedule (Sevda Shishmanova, interview). BNT tends to focus more on innovative programmes that provide freshness, in contrast to the risk aversiveness of commercial television, which often dances to more conformist and imitative tunes. BNT imposed political reality programmes (The Big Choice, The Promise), produced non-commercial format (The Big Read, followed by The Little Big Read) and demonstrated that advertisers are favourably disposed towards investing in quality content, and not just in ratings:

Successful formats, as is the case with The Big Read, unprecedentedly proved that high quality is very likely to draw greater audience. It turned out that, despite this very strong wave of reality- and game show formats prevailing on commercial media, the viewers are gradually returning all their senses towards the educational role of the media (…), towards television as a space that can
contribute in forming their own taste, standard and criterion for themselves. (Sevda Shishmanova, interview).

7.3 In the search of successful formula

The pressures on funding, the growing plethora of competing commercial channels, just before the upcoming digital challenge, have not yet washed away generalist public television in the country. The programming analysis suggests that, in general, BNT’s programme offerings still appear to follow the broad contours of the paradigmatic models of broadcasting. Yet, the new broadcasting environment does, however, seem to foil the conventional division of labour that considers private channels as the prime suppliers of entertainment, and public broadcasters as the preferred providers of information. Looking at the shifts between programme categories and the hybridity within them (despite the lack of depth), it becomes increasingly intricate and misleading to reckon literally on Raymond Williams’ typology (1974), where PSB (Type A programming) favours news, public affairs, music and arts, documentaries and children’s programmes, whereas commercial television applies a Type B programming focusing on movies, series, serials and soap operas. The distinction between Type A and Type B programming is regarded more as a yardstick than an ultimate tool for the analytical purposes of today, as it reflects the programme output dating back to the 1970s and does not grant recognition to the changing mediascape and shifting patterns of consumption.

7.3.1 Popular support

Recognised both as an institution and a kind of programming, fundamentally intertwined with matters of the common good rather than private gain, public service broadcasting is needed as a tool of pluralism and diversity, as an instrument of education, unification, and building a constructive national identity (Prince & Raboy 2003). In the context of a rapidly changing media landscape, even though a public broadcaster develops pluralistic, innovatory and varied programming of high ethical and quality standards, this does not necessarily imply that the public service mission is fulfilled. As Shishmanova clarifies, the fact that the programming requirements of BNT are formally present in its transmission schedules does not justify its public service commitment (interview). BNT’s mandate is socially useful only in so far as its
programme offerings are valued and watched by a significant audience. As Collins puts it, “if their [PSBs’] programmes remain unwatched they can neither exercise a beneficial effect on the market as a whole, nor effectively contribute to society by bringing merit goods to the viewers and listeners who pay for them” (Collins 1998: 24, quoted in Lewis 1999: 218). However, in today’s situation, where competition and choice are very much more developed than the historical setting PSB pertains to, achieving and maintaining a sizable audience reach is an exacting challenge. Besides, a distinctive programme profile is not easily compatible with a large impact.

The pursuit of high ratings may appear counter-intuitive to the objective of public service programming. It does, however, matter, given that achieving high ratings is tightly related to the size of the audience attracted, which is at the very core of PSB’s legitimacy. Ratings, therefore, are reckoned to be the best yardstick for assessing BNT’s contribution to the quality of life in Bulgaria (Sevda Shishmanova, interview). This is also grounded on the impetus to combat the declining viewership figures and reconnect with the citizens it serves. In this respect, BNT has resorted to a commercial approach to programming a content of social value, exemplified by The Big Choice I, The Big Choice II, The Promise). The various forms of reality TV formats are regarded, therefore, not as trivial attractions, but rather as more accessible formats for wider public debate and information, educating the public in stronger involvement and watchfulness. They are seen as means of achieving public goals and maintaining legitimacy.

This is seen as a way of re-establishing the damaged and crumbling relation between the Bulgarian public broadcaster and the audience. It’s worthwhile noticing that in the past, during the state-monopoly period, the Bulgarian national television was engaged in a firm partnership with the politics and the ruling Bulgarian Communist Party. When the rapid rise of commercial television, instigating the development of advertising market and consumer sovereignty, took center stage, the view of public as the prime frame of reference became vital. Bardoel & d’Haenens (2008: 341) appear to have recognised this uneasy task for public broadcasters, namely, seeking support of a rapidly changing society, characterised by major social trends of individualisation, distinct audience segmentation, and lesser collective participation.
Viewed from this point, BNT has, observably, become more perceptive of the output broadcasted and the number of viewers attracted. Trying to obtain popularity among the Bulgarian society, it is increasingly paying close attention to viewer ratings, as they constitute an important indicator of performance. Although generally agreed in the literature that viewing figures are improper for assessing public service broadcasting, they, certainly, enable the broadcaster to take account of the viewers’ preferences in restoring the relationship between the two. The successful modus operandi, according to the BBC’s strategy document, *Building Public Value: Renewing the BBC for a Digital World*, lies in creating “shared experience” (BBC 2004). This refers to providing both popular and elitist high-quality programmes that bring together disparate societal groups and create shared experience in ways that few other activities can (*ibid.*: 26). Drawing lessons from BBC’s prolific wisdom, BNT seems to have taken a step closer towards this collectivist goal, nicely exemplified by projects such as *The Big Read, The Bulgarian Events of the Twentieth Century, and The Big Choice*. Certainly, quality and creativity of programme content can build significant public value, and, notably, provide a justification for broadcaster’s pivotal role as “the most powerful socio-cultural institute that sets up models for behavioural patterns and cultural standards (Ivo Draganov, interview 18.01.2011).

### 7.3.2 Domestic ‘ecology’ and economic survival

In an increasingly global world market, where the inexorable flow of international programmes has become common currency, the need for an accurate reflection of national, regional and local identities seems greater than ever before. Notwithstanding the increasing scepticism in the sustainability of a unified national culture, the Bulgarian media policies appeared strongly protectionist in this respect, imposing certain obligations in order to ensure that the domestic ecology of programme production is preserved. The empirical data reveals the superiority of national content on BNT’s programme supply, signifying a high enforcement of the media legislation. The findings show the ability of the public service broadcaster to foster a strong national production base that reflects and sustains the Bulgarian culture and identity. In contrast to the insufficient funding that implicitly entails recourse to the low-cost mass appeal production of chiefly American origin, BNT has resisted the influx of overseas programmes. The international presence in the programme offerings of BNT
is predominantly of European origin, which bespeaks the broadcaster’s commitment to the EU requirement of broadcasting European production amounting to 50 percent of the annual output. The assumption of great reliance on U.S imports appeared invalid in the case of BNT. The findings lend credence to the broadcaster’s growing distanciation from such programmes, relinquishing American entertainment supply to the commercial rivals.

Viewed from this perspective, it may be right to argue that in order to maintain its distinctiveness and fulfil a publicly valued mission, and not least to survive in the digital media ecology, BNT must retain its role as national content provider and producer. The Bulgarian public operator has indeed concentrated on more in-house production, especially evident in the news category, current affairs, human stories, arts and musical programmes. Figures for 2011 reveal operator’s slight retreat from independent productions, as they often represent a high expenditure for the public channel, that has seen its public funds cut steadily over the past years. The underfunding of the broadcaster raises further concerns for the nature of the programme content. To maintain the quality of its programme provision, correspondingly, BNT resorts to more co-ventures. It seizes the opportunities that such collaborative projects provide for renewing the programming profile with content, co-produced by renowned production teams. This, in turn, potentially extends the territory for advertisers. Moreover, given the current financial plight of BNT, with the state subsidy unlikely to increase, commercial activity must make up the difference. The goal of obtaining a high level of reach appears, therefore, also very advantageous in regard to BNT’s advertising sales rates, advertisers’ interest and overall market conduct.

7.4 Conclusion

This thesis has sought to investigate how the Bulgarian National Television negotiates the tension that exists between market imperatives and the public service mission. With the triumphant rise of commerce and its overriding quest for profits, BNT found itself on uneasy perch. The public channel was both expected to compete for a slice of the advertising pie and simultaneously engage in programme production that serves certain noble purposes, greatly rooted in the ideal notions of social utility. At issue is
the question of whether BNT manages to find a balanced position between the two conflicting grounds. To capture the intricacy and the dialects of the interplay at hand, I examined the mixed funding arrangements of the broadcasting institution, its characteristic policy and programming goals and their responses to the competitive conditions. The breadth of analytical ambition called for a mixed methods approach to research, where a combination of document analysis, semi-structured interviews and quantitative content analysis was employed for the purpose.

7.4.1 Main findings: BNT’s position in relation to the market and its public service mission

The European Union has, on many occasions, acknowledged that the price of fulfilling a public remit is high, and, hence, an adequate level of funding of the public broadcasters is greatly recommended. Left within the discretion of the individual member states, the analysis of BNT’s financial and programming properties showed that the Bulgarian state has laid down the legal pillars for the functioning of its public service operator. Through detailed content stipulations, programme quota prescriptions and advertising restrictions, the media policy seems to provide the conditions for BNT to attain a balance between culture and commerce. However, the delicate equilibrium between commercial populism and public service responsibilities is a challenge confronting. The analysis of BNT’s funding scheme, revealed failure in the implementation of the independent Radio and Television Fund, along with dwindling and insufficient state funding, incongruous to the growing programme production cost. With that at hand, the dependence on advertising, although constrained, leaves the broadcaster open and particularly vulnerable to commercial interests.

Interestingly, the worrying traits of commercialism and the threat of erosion of public service values have not yet got their hooks into the programming domain of BNT. The study found a growing reliance on public service based conceptualisations, promoting diversity of programme content and distinctiveness of offerings. Although dragged into the competition battle, BNT provides a wide range of selection and choice to the large majority of citizens while catering also for the needs of marginal groups. The programming profile clearly attests to BNT’s genuine mix of programme offerings comprising high social-value genres, popular mass-appeal and minority-
tailored programming. Moreover, BNT endeavours to ensure that the domestic ecology of programme production is also preserved. The overall findings clearly indicate that the public service paradigm has the upper hand within the programming philosophy of BNT. Positioning the Bulgarian public broadcaster into O’Hagan and Jennings’ two-dimensional model, a balance in the interaction between public service remit and commercial viability seems to be at hand.

![Figure. 7.1 Balancing public service remit and commercial viability](image)

BNT’s placement in quadrant III reveals that the goals of the Bulgarian public broadcaster are first and foremost directed to serving certain public purposes, of which profit motives are only subsidiary and instrumental to the larger objectives. BNT has, however, recognised that the changing foundation of the broadcasting industry and the multiplicity of channel choice have stressed the importance of economic viability and consumer choice in the legitimacy of any broadcaster. Distinctiveness alone is not enough. To be justified the public service commitment must be valued and watched by a significant audience. BNT should be large enough, well funded enough, and mainstream enough to have a significant market share. Although still searching for the right mix of offering, the Bulgarian National Television has found a feasible formula: the current strategic relevance of popular
programming for public broadcasting makes it necessary to withstand the common dismissal for popular genres and to articulate their necessary contribution to the public project.
References:


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Funding public service television in the digital age, Eastleigh: John Libbey Publishing


Appendix 1

Transmission schedules

Programme categories

1 News/info
2 Current affairs
3 Human stories
4 Arts
5 Educ
6 Sport
7 Fiction
8 Enter
9 Music
10 Child
### BNT 2009

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**Note:** The table provides a schedule for various programs and events, including news, health, and entertainment.
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**Notes:**
- The schedule includes various programs such as news, movies, music, and live events.
- Programs like "Delicious," "Furrow," and "Teleshopping" are listed.
- Specific times and details are provided for each segment.
- The week includes a mix of entertainment and informative programs.

**Language:**
- The text is in English, with some mentions of languages like "Japanese" and "Czech."
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**BNT 2011**

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**The day begins**

- **National Calendar 5**
  - Here comes the local music
  - 57

- **To animals with love 27**
  - Animation
  - 50

- **Doctor Snaguls Cool**
  - 57

- **(political slot)**
  - 57

- **Vascko da gama**
  - Phenomena
  - 13+27

- **Headline 5**
  - 26+26
  - co-production

- **News**
  - 54
  - 54
  - 54
  - 54
  - 54

- **Women**
  - 43
  - 43
  - 43
  - 43
  - 43

- **Health (live)**
  - 42
  - 42
  - 42
  - 42
  - 42

- **Teleshopping 15**
  - 42
  - 42
  - 42
  - 42
  - 42

- **Plenary**
  - 60

- **On Sunday with...**
  - 60

- **Private case 5**
  - 30
  - 30

- **Teleshopping**
  - 27

121
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**Notes:**
- News: Bansko 2011 ski program
- Delicious: Symphonic orchestra
- Main newscast: Main newscast
- Sport news: The show
- The Promise: BNT criminal
- Referendum: Night Birds
- Fubal Studio: Ivanov
- Phantoms UK: Night Birds
- Panorama of the Channel: Undercover
- Economic News: Economic News
- Denis: Denis
- See BBC: See BBC
- Film: Film (konsert) Germany
- Economic News: Economic News
- Denis: Denis

**Additional Information:**
- Little stories 13
- News for hearing impaired
- A minte
- Cinema on the road
- All in front of the screen
- Beautiful scient
- BNT&UK Lotto
- Volkball Sport fever
- Snowwhife (anim.) 25

**Program Highlights:**
- Here comes the local music
- China on
- BNT Taxi
- Bulgaria - Cuba
- The library
- Olympic chronicle
- A program for cinema (n)
- Faith and Society
- Good night children
- Main newscast
- BNT Taxi
- Sport news
- The show
- BNT criminal
- Night Birds
- Ivanov
- Film (konsert) Germany
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**BTV 2011**

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**Notes:**
- The devil knows best is a recurring theme throughout the schedule.
- The Fall of Leaves is also a frequent occurrence.
- The Lords of the chanel, Btv news, and Glass home are consistent throughout the day.
- The Madallion and The great Bulgaria are highlighted as significant events.
- Back Alleys and Glass home are recurring locations.
- The Most famous circus band is highlighted on the 19th.

**Day 1 Overview:**
- The schedule includes various music shows, news broadcasts, and other events.
- The Madallion event is scheduled twice.
- Grey’s anatomy is repeated several times.

**Day 2 Overview:**
- The Fall of Leaves is a prominent feature on the 15th.
- The Devils know best is a recurring theme.
- Btv news is scheduled multiple times.
- Glass home is a consistent location.
- The Madallion is a notable event.

**Day 3 Overview:**
- The Fall of Leaves is a recurring theme.
- The Devils know best is a consistent theme.
- Btv news is scheduled multiple times.
- Glass home is a consistent location.
- The Madallion and The great Bulgaria are notable events.

**Day 4 Overview:**
- The Fall of Leaves is a prominent feature.
- The Devils know best is a recurring theme.
- Btv news is scheduled multiple times.
- Glass home is a consistent location.
- The Madallion and The great Bulgaria are notable events.

**Day 5 Overview:**
- The Fall of Leaves is a recurring theme.
- The Devils know best is a consistent theme.
- Btv news is scheduled multiple times.
- Glass home is a consistent location.
- The Madallion and The great Bulgaria are notable events.
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### Appendix

**List of interviewees**

**Assya Kavrakova** – Specialist on media policy within the European Union
Boyko Stankushev - Member of the Management Board of BNT, “Programme Development”

Margarita Pesheva - Media Regulatory Expert

Sevda Shishmanova - Programming Director of BNT Mrs.

Maria Donkova - Head of Sales at the Marketing Department of BNT

Emilia Vasileva - Ratings Section at the Marketing Department of BNT

Ani Sokleva – Programming department at BNT

Ognian Zlatev- Member of the Management Board of BNT

Ivo Draganov- A media regulatory expert