

Media Systems: A Comparative Analysis of Britain, the United States, Canada and France

Olusesan Asekun-Olarinmoye¹ Oluwakemi Oriola² Olushewa Akilla² Shade Ade-Johnson³
1.Dept of Mass Communication, Adeleke University, Ede, Osun State, Nigeria
2.Dept of Mass Communication, Tai Solarin University of Education, Ijebu-Ode, Ogun State, Nigeria
3.Dept of Mass Communication, Adekunle Ajasin University, Akungba-Akoko, ondo State, Nigeria

Abstract

Much has been said about the roles of the mass media in the society and the enormity of their influences as derived from their functions in the society. On the other hand, experts are in constant debate of how the society in which the media operate shapes their structures and operations. As a sub-system in the entire societal system, other institutions have a bearing on the operations of the media. Government is a major institution whose roles in dictating media structure and performances cannot be overlooked. One way of considering the interrelationship between the media and the government of a particular society at a particular time is the analysis of the country's media system. Given that the political ideology of country would shape the philosophy of its media a comparative study of media systems of different countries would assist to understand the different colourations of the media based on the corresponding variations in political milieus. This paper explores the media systems in Britain, the United States, Canada and France 'with a view to comparing them on the basis of general operational models which determines ownership, control, policy regulation and normative philosophies. The paper establishes a share difference between France and the other countries: the former being a polarised pluralist and others, liberal models. Among the liberal models, the United States system exhibits the highest level of liberalism and this accounts for the system's global acclamation of the freest media. Government control of the media is most pronounced in the French system through subsidies: strong in the British media through government ownership of broadcasting; moderated by the Canadian government concerns about national identity, which calls for state control on foreign media products.

Keywords: media system, political ideology, philosophy.

1. Introduction

An in-depth understanding of the working of the mass media system requires a good grasp of the concept of the society. A definition considers society as the web of social relationships, the whole complex scheme or whole tissues of social relationships (Daramola, 2005 p.1). The existence of social relationships is determined by reciprocal relational behavior, which exists in patterned ways and through which humans interact. Going by this explanation, it is valid to agree (as sociologists affirm) that the basis of the human society is social interaction - among the social institutions that constitute the various societal system (at the macro-level) and among human beings in the society (at the micro-level). As a sub-system within the societal system, the mass media institution provides the avenue for interaction among the other sub-systems and among humans existing therein. As Peterson, Jenson & Rive (1965) point out communicating remains the carrier of all social processes and the means for man to organize, stabilize and modify his social life while passing such to the next generation. Thus, between the mass media and other institutions (government, religion, education culture to mention a few), there exists an interrelationship patterned in a particular way to suit the society's vision.

The pattern of relationship between the mass media and other institutions in the society is shaped by the political ideology prevalent in the society at a particular time. This accounts for different media operational philosophies at different phases of a particular society (for instance, media in Nigeria under military dictatorship and under democratic governance) and from one society to another (for instance, the communist society of China versus liberal society of the US). It is important to note that government as an institution shapes media operations through policy formulation, which is dictated by the prevailing political ideology. By implication, government (through its political ideology) dictates the nature and direction of media policy and operations, which in turn determines the pattern of interrelationship between the media and other institutions, including government. This practice is referred to as media governance (McQuail, 2005) and it has its purposes and various forms.

In the idea of McQuail (2005), medial governance is both formal (involving laws, rules and regulations guiding media operations) and informal (concerning market forces, public opinion, professionalism and ethical conduct). Media governance is also carried out for various purposes. The overall intention is to ensure that the media conform to the existing political ideology. In this regard,

Folarin (2002) observes that the mass media are like chameleons which take after the coloration of their environments. In line with this thought, different media systems have evolved in the world history. However, each system has particular applications and relevance to the political philosophy of the government at

each point in time.

1.1 Global Media Systems: An Overview

The political situation of any country determines the nature of the communication or media policy its government would formulate. Media policy determines the structure and operations of the mass media industry and by extension, the nature of the media system. A number of issues are addressed in media policies and these include ownership, control, press freedom, freedom of expression, allocation of resources to the industry, and training of media professionals, just to achieve the vision of government. All these issues shape the media system in every society. But before a discussion of some germane issues related to this discourse, a conceptual clarification of media system is imperative.

Hardy (2008 p.5) describes media system as comprising "all mass media organised or operating within a given social and political system (usually 3, state)", It can also be described as an organized sector composed of the organisations, professional bodies, regulatory bodies, resources and operations of the- media industry within a particular socio-political system at a given period. McQuail's (1992) explanation distinguishes between micro-system, meso-system and macro-system. A micro media system refers to a single media organization (a radio or television station or newspaper house) while a meso media system comprises all media outfits in a particular industry sector such as the radio or TV sector. At the macro-level, consideration is given to a country's national media system comprising all relevant media. Our concern in this paper is the macro analysis of the media with a focus on comparison between national media systems of the selected countries.

Meanwhile, every media system is located within a political structure from which it derives its operational policy, There is thus a complex and powerful link between the media system and the political system, which is often characterized by conflict and suspicion (McQuail, 2005). Government thus shapes the structure, conduct and performance of the mass media through laws, regulations and policies, all in line with its ideology. Located within the global political systems, six distinct media systems have evolved namely: authoritarian, soviet-communist, libertarian, social responsibility, development and democratic participant system. Each media system prescribes a different set of normative principles, ownership model, control mechanism and general functional guides relevant to the prevailing political ideology.

Authoritarian media system emerged in the 16th century England as a response to promotion or literacy and information spread ushered in by the invention of printing by Gutemberg (Demoinick, 2011), It was based on the normative tenet that held that the ruling elite, who attained leadership through divine, financial and political powers should guide the masses whose intellectual abilities were held in low esteem. The media are forbidden from government criticism and dissent and as such, the media institution is used as an arm of the government. Monarchies and military dictatorship exhibit authoritarianism. Ownership of the media in such a system is by government and private individuals/groups who are loyal to it. Government controls the media through measures such as repressive legislation, heavy taxation, licensing, pre-publication censorship, recruitment of staff, arrest and detention of media professionals, granting of exclusive printing rights to favoured elements.

Soviet-communist media system emerged from the re-organization of the media following the 1917 revolution (Folarin, 2002). The theory derives its normative tenets from Marxist model of communism aimed at promoting the socialist political system. As a variant of authoritarianism, it operates a closed-system in which the media are strictly owned and controlled by the government as its organs. The media are to maintain the sovereignty of the proletariat, support the communist model or development and disallow any alternative ideology China and countries of the East Block exhibit these traits.

Libertarian media system emerged with the popularity of democracy. Baran & Davis (2009) note that the origin of this system dates back to the 17th century Europe characterized by social upheaval against arbitrary power over the people, who demanded greater freedom from authoritarian leaders. As an opposition to authoritarianism, the libertarian system derives its philosophy from human natural rights and rationality. Based on these considerations, the system empowers the media to create a free marketplace of ideas where individuals have the right to hear all sides of issues to distinguish truth from falsehood. It is on this principle that freedom of speech of the press are berthed. The media are thus free to criticize government without any restriction or interference. Ownership of the mass media is by private owners and the media are free from government control. Since it is arguable that there is no absolute freedom anywhere in the world, the only control mechanism for the media under the libertarian system is the rule of law. Media professionals are thus to freely conduct their business within the ambit of societal laws.

Social responsibility media system evolved in the mid 20th century after World Wars I & II. As a hybrid of libertarianism, the system operates under the philosophy that the media should enjoy freedom, but they also have duties and obligations which they perform to the society, attached to the freedom. Some of the basic tenets of this system include that the media should fulfill societal obligations by upholding high professional standards and be self-regulating within the framework of the laws (McQuail, 1987). Ownership of the mass media is private while control is through self-regulation. But the system provides a caveat that the government may

involve itself in media operations by issuing regulations if the public interest is not being adequately served (Dominick, 2011).

Development media system prescribes the behaviour of the media in Third World countries. The theory is credited to McQuail (1987) who considers the need for a media system that could cater for the needs of such societies. Its philosophy is based on the peculiarities of such societies and calls for the support of the mass media with the government in its developmental pursuits. Thus the needs to serve national goals for economic and social, developments drive the operations of the media, Ownership of the media may be public, private or a combination of the two. Government however holds the control mechanism in such a system for the purpose of directing media operations towards a national purpose or development. The provision of government control in the development media system has been criticised as having an element of authoritarianism. But proponents argue that this is required due to the needs of the society and the level of ethnical maturity, which is low in developing societies.

Democratic participant media system evolved as a criticism against public media as promoted in authoritarianism and soviet-communism, and private media as modeled in the libertarian and social responsibility. The argument is that public media are too bureaucratized and centralized, and private media too monopolized and commercialized. Social responsibility was also accused of professional hegemony. The foregoing, according to proponents of democratic participation, has led to public disillusionment as the media could not perform their roles effectively in a political structure (McQuail, 1983). The alternative normative principle is that pluralism should be promoted through the operations of small media outfits, which would effectively mobilize grassroots people for participation in a political system. In essence bureaucracy and centralism should give way to decentralism. pluralism should replace monopolization and commercialization. It has been argued that the mass media are too important to be left in the hands of professionals, hence professional hegemony should also be broken to allow for easier access to the media by the people. Ownership and control in this system are thus pluralistic and the media generally operate horizontal instead of vertical model of communication, and associational mode that promotes (grassroot) participation in a political system.

Beyond the normative classification of media systems, scholars have developed media system models based on empirical evidences for better understanding of the workings of the mass media. Three simple and discrete models have been formulated thus: liberal, democratic coporalist and polarised pluralist models (Hallin & Mancini;2014). This paper will take a consideration of this typology in its analysis of interrelationship between governments of the selected states and the media within the purview of media policy/regulation, ownership, control, media professionalism and the role of government in shaping media system. This comparative analysis is aimed at gaining deeper understanding of singular media industries in the selected societies. Hantrais (1995) observes that comparisons help sharpen the focus of analysis of how the media behave in different locale. Comparative media analysis also exposes similarities and variations in media systems and is useful for formation and refinement of concepts about media behavior (Hallins & Mancini, 2014). However, this paper is focused on the in all the aforementioned parameters.

The British Media System

The British media operate a liberal model of media system. Hallin & Mancini (2004) describes a liberal model as one which is characterized by relative dominance of market mechanism and commercial media orientation. The media system in Britain consists of several meso-systems: television, radio, newspapers, magazines, the new media, the music and film industries. The system operates a public-private ownership model - the government owned British Broadcasting Corporation (BBC) is the largest broadcast provider and the Independent Television Commission (ITV) plc, the major competitors. News Corporation operates a number of leading national newspapers. At the regional levels there are many radio and television stations and newspapers and magazines.

In terms of political parallelism - lines of division within the political system - the British media, system operates a neutral philosophy. This implies that 'there is no division within the media industry along political party lines of division within the political system. (Hallin & manicini, 2014), Hardy (2008) observes that political parallelism (as practiced in the British system) is as a result of commercialization of the media into highly capitalised and profitable businesses. The media have thus become independent on governments subsidy and support from influential individuals, who may have political learning.

Also, in practice, the British media system exhibits information-oriented journalism and professional model of media governance in the broadcast sector. By implication, social responsibility is the guiding normative principle of the British media due to its formally autonomous system and professional regulatory model. In terms of professionalism, the British media system is strong, non-institutionalised and self-regulatory. Control is therefore decentralized - there is no central authority of the government regulating the system.

Currently, the British broadcast system operates a market-driven business model except with the state owned BBC on which there is an indirect control through the setting of license fee. This was one of the recommendations of the Crawford committee of 1926, which introduced public service into the British media

system as well as media independence and utility, thereby promoting cultural cohesiveness among the British elite (Curran & Seaton, 2003).

The legal regulation of the media in Britain is in the Communications Act 2003 - an Act of the parliament of the United Kingdom. The Act repealed the Telecommunications Act of 1984 and introduced the Office of Communications (Ofcom) as the industry regulator. Among other measures, the Act introduces legal recognition of community radio and removed restrictions on cross-media ownership. It however discourages the use of other people's Wi-Fi broadband connections without permission. More remarkably, the Act allows non-Europeans to fully own British television for the first time in the country's history (Communication Act 2003).

The British media system is under government approved regulatory authority of the Office of communications (Ofcom) which presides over licensing, research codes and policies, complaints and protection of the radio spectrum from abuse. It has regulatory and competition authorities over the broadcast, telecommunications and postal industries of the media system in the United Kingdom. Its activities include setting up regulatory guidelines for television and radio broadcasting, telephone and broadband sector, spectrum licensing and protection, regulation of postal services and consultations with industry stockholders and the public to help it make policy and regulatory decisions based on evidences presented (Office of Communications, 2003).

The American Media System

Still following the Hallin & Mancini's (2004) typology of media systems, the United States operates a liberal model. The industry has even a longer history of liberalism than the British system, having evolved an earlier commercial press that has largely displaced affiliations to political parties and trade unions (Hardy, 2008; Hallin & Mancini, 2010). The United States has also evolved a purely commercial media industry - press and broadcasting - earlier than Britain, until the formation of small

Like in the British system, the American media exhibit a neutral, commercial and information oriented journalistic practice unlike the French commentary approach. But while the British media exhibit external pluralism, the American media exhibits internal pluralism in terms of political parallelism which generally low in the two countries, but lower in America. Political affiliation in the American media has declined substantially. In the words of Hallin & Mancini (2010 p.116), "journalistic culture came to be dominated by the principles of political neutrality and separation between the media and the institutions of political life" in the United States. However, the acclaimed liberation of the media from political influence has stirred up a debate of possible media leaning towards certain economic interest, being a commercial-driven industry.

Meanwhile, the professional model of media governance practiced in Britain is also in practice in America. The professional model of governance in the system is fashioned after the social responsibility theory, which encourages self-regulation under a formally autonomous system. Similar to the British system the American media practice is highly professional, non-institutionalised and self-regulatory (Hallin & Mancini, 2010). It is a market-driven industry. While public broadcasting is strong in the British system (with which it shares the liberal model) it is relatively indistinct in the American system.

State regulation of the media in the United States' model of liberalism is even more limited than in Britain. The First Amendment to the United States Constitution plays a central role in shaping the operational framework that makes many kinds of government regulation in the United States impracticable in legal and political terms. Government only creates a favourable legal framework to promote America's ideals of a free marketplace of ideas necessary to expand the media and public sphere. It also provides basic infrastructure to promote commercial media.

Media ownership in the United States is predominantly private, with no nationally-owned public outfit like the BBC. America operates a decentralized private ownership model in which the media are owned by private concerns and there is no government's central authority controlling media operations (Dominick, 2011; Oriola, 2012). The American media system consists of newspapers, magazines, radio, television, books internet and several different new media. The country also has a vibrant music industry as well as media conglomerates, which tend to lead to global landscape. The industry operates a free market system encouraged by the passage of the Telecommunications Act of 1996, which promoted deregulation and convergence leading to mega mergers, further concentration of media ownership and emergence of multinational conglomerates (Howard, 2015). There are six corporations that control about 90% of the American (and by extension, global) media called The Big Six namely: Comcast, The Walt Disney Company, News Corporation, Viacom and CBS Corporation (Ownership chart, 2009).

The American media system is acclaimed to enjoy greater freedom than any other system in the world. There is no direct or indirect government control over the press through subsidies, licensing laws or any other official means. Broadcasting is under the regulatory authority of Federal Communications Commission (FCC) created by the Communications Act of 1934 to regulate telecommunications and broadcasting sectors of the media industry. Thus media legislation and policy formulation dates earlier in the American than in the

British system – the latter’s version of America’s kind of legislation was in 2003. The United State Congress gave the authority to the FCC to issue licenses to companies to use the spectrum, with the overall goal of pursuing “public interest”. The need to pursue public interest made the FCC issue early policy regulation that the public would benefit from a diverse array of owners who would relay an array of content (Jonathan, 2009). This marked the beginning of media pluralism in America.

The 1975 Cross Media Ownership Rules of the FCC banned the ownership of a daily newspaper and broadcast station covering the same community to ensure a diversity in communication through different outlets and to limit media concentration. The Telecommunications Act of 1996 repealed the cross media ownership rule to encourage competition in the ‘public interest’. The law resulted into mergers of several companies which still operate till today. In 2002, the FCC ruled that newspaper/broadcast cross-ownership regulation was no longer necessary in the public interest to maintain competition, diversity and localism. This rule was revised in 2007 and FCC made provisions to take each case on its merits to determine if cross-ownership would affect public interest (Jonathan, 2009) Hence the FCC ruled that a company could own a newspaper and broadcast station in any of the top 20 media markets, provided that there are at least eight media outlets in the market.

It is noteworthy, that the American media system berths its media legislation on public interest, the sort that is not distinctively advocated in the British system. There are no laws prohibiting foreign investment in the United States media, except the ownership rules that apply to all. Foreign ownership of television stations in Britain dates back to 2003, much later than in the United States. Foreign journalists are not subjected to special visa restrictions nor restricted from disseminating news to the home countries. However, foreign companies are still not significant players in the American media industry, except in the book publishing sector.

The Canadian Media System

The Canadian media system, like the British and American systems, exhibits the liberal model. The system reflects the needs of multicultural groups of people in the country as well as the political structure. Ordinary Media policy is mostly described as a relatively obscure field of activity that concerns politicians, media owners and regulators. The public is largely absent. Raboy and Taras (2004) report that Canada media system is counter example of this statement, as it has been created largely in the public spotlight. It can therefore be inferred that the media system in Canada operates a normative philosophy of social responsibility.

Again, McQuail and Siune (1986) have shown that in respect to European media, the degree of influence of various actors is directly related to their proximity to political decision makers. This is certainly true in Canada as well. Nevertheless, studies showed that Canadian media policy making is also marked by a remarkable and possibly unmatched degree of transparency, resulting in a rich public discourse on media which inevitably makes the system more accountable to the people it is supposed to serve (Raboy, 1994; Taras, Pannekoek and Bakardjieva 2003).

Consequently, the media tend to be free to report events. The Broadcasting Act states that there should be “freedom of thought, belief, opinion and expression including freedom of the press and other media of communication”. Little wonder, there are over 200 cable and digital TV services including ones aimed at children, business community, aboriginal people, older citizens, gay and religious viewers. The freedom to air is much essential and evidenced in the numerous kinds of programming disseminated to these heterogeneous audience. However, the policy also stipulates that these wide ranging freedoms are subject to “such reasonable limits ... as can be demonstrably justified in a free and democratic society”. The extent of demonstrably justified is not stated as this phrase can be a hidden trap for the media practitioners.

Although, Canada is among the countries with decentralized media system, much of Canadian public policy is determined by the third arm of government especially in the areas of broadcasting and telecommunications. In the real sense of it, there are other regulators other than the third arm of the government which regulate the policies of the media. The Supreme Court and the provisions of the Canadian Charter of Rights and Freedoms which came into effect in 1982 are the major ones that have been empowered to effect the policies. Raboy (1994) and Taras et al (2003) report that the Supreme Court has decided a number of cases involving the rights and power of the mass media. Among these judgments include whether TV advertising could be aimed at children, the right of tobacco companies to advertise, the legality of government restrictions on the publication of poll results 48 hours before an election, on the legitimacy of libel and hate laws and on whether pornography legislation places unacceptable limits on a person’s right to privacy and expression.

The mass media in Canada are majorly owned by private concerns while a limited number of them are government-owned. However, the structure of Canada’s media industry is constantly changing through mergers, acquisition and creation of new companies. This is as result of emerging business opportunities brought by changes in technology which has invariably eroded the traditional boundaries surrounding media markets. Various studies showed that the media ownership in Canada is in three discernible concerns. Initially, there were only few newspapers owners but as time went on especially in 2000, attention shifted to cross ownership. According to Edge (2008), cross-ownership of media occurs when a person or company owns outlets in more

than one medium (newspaper, radio, and television) in the same geographical market. It is a business strategy driven by advances in technology and also a public policy issue due to concerns over increased concentration of ownership. Edge (2008) report that a prohibition against cross-ownership of newspapers and television stations was issued in 1982 by Order in Council after a Royal Commission on Newspapers recommended restrictions on ownership. The cross-ownership prohibition was allowed to lapse in 1985 following a change in government from Liberal to Conservative. At a later point, digitization was introduced and this later resulted in convergence of media with telecommunications and IT.

The term ‘convergence’ refers to the coming together of the technologies of media, telecommunications and computing. It is also used sometimes to denote greater technological overlap between broadcasting and other conventional media forms. Digital technology – i. e. the reduction of pieces of information to the form of digits in a binary code consisting of zeros and ones – is the driving force behind convergence. According Edge (2011) media landscape in 2000 to a much greater height as the consolidation raised Canada’s media landscape in 2000 to a much greater height as the consolidation raised Canada’s level of media ownership concentration, which was already among the world’s highest (Winseck, 2002; Edge, 2011). By the end of that year, Canada’s two private television networks had partnered with national newspaper properties, as had the largest privately owned French-language network in the province of Quebec. CTV, the country’s largest private network, was acquired by telecom giant Bell Canada Enterprises, which then partnered with the Globe and Mail nation newspaper to create a Cdn \$4 billion multimedia enterprise initially known as Bell Globemedia. CanWest Global Communications, which owned the national network Global Television, bought Canada’s largest newspaper chain, Southan Inc., for Cdn\$3.2 billion. Quebecor, a newspaper company that started in Quebec but had expanded nationwide with its 1998 purchase of the Sun Media newspaper chain then paid Cdn \$5.4 billion for Quebec’s largest cable company, Groupe Videotron, which owned the TVA network in Quebec (Edge, 2007).

The Canadian government regulates media ownership and the state of media through the Canadian Radio and Telecommunications Commission (CRTC). The CRTC, whose members are appointed by the federal government, regulates all aspects of electronic media in Canada and enforces the Broadcasting Act as well as the Telecommunications Act. Among the principal powers that the CRTC exercises is the power to grant, renew and set the conditions for broadcasting licenses. There is license hearing before the license is eventually issued and it is at this point that democratic accountability is exercised. The media practitioners appear in front of the Commission to answer question about their past performance as well as explain their plans for the future. Members of the public are invited to write to the Commission if they have concerns or wish to express their views. When new licenses are at stake, broadcasters are allowed to wage campaigns to mobilize civic and community group to their side by endorsing their applications.

Although newspapers and magazines are unregulated, broadcasting comes under the aegis of the Broadcasting Act of 1991. Section 3, which is the main level of the act, stipulates that Canadian broadcasting is a public service, comprised of public, private and community elements, and that broadcasters must air programming that reflects Canadian attitudes, opinions, ideas, values and artistic creativity’. The most controversial parts of the Act are the sections that deal with Canadian unity and identity. The Act states that broadcasting must serve the needs and interests, and reflect the circumstances and aspirations of Canadian men, women and children including equal rights, linguistic duality, the multicultural and multiracial nature of Canadian society and the special place of aboriginal peoples. Broadcasting is also seen as being essential to the maintenance and enhancement of national identity and cultural sovereignty. The CBC is now expected only to contribute to shared national consciousness and identity. Another core provision of the Act ensures that broadcasting outlets will be owned and controlled by Canadians. This is a sharp contrast to the American and British systems where broadcast outfits could be owned by foreign business concerns.

Apart from the CRTC, there are other regulators which are interest groups and industry self-regulation. The interest groups are made up of public interest group and associations representing the creative sector, some of which have considerable influence. For instance, the Friends of Canadian Broadcasting (FCB) that was created in 1985 speaks for a paid membership of some 60,000 Canadians (mostly from English-speaking Canada). It has been an outspoken supporter of public broadcasting, Canadian content, local and regional broadcasting and responsible role for the private sector. The FCB regularly carries out independent research studies as well as public opinion surveys which are consistently reported in the press and cited as authoritative sources. Other constituency-based organisation such as Media Watch and the Centre for Research Action on Race Relations (CRARR) are regular interveners in public consultation. Artists and creators are represented by groups such as the Canadian Conference of the Arts, ACTRA (Alliance of Canadian Cinema, Television and Radio Artists), the Canadian Independent Film Caucus, and the Canadian Film and Television Producers Association. On the French-speaking side, a coalition of seven creators’ groups including the Union des Artistes presented one of the most substantial and effective briefs to the Lincoln Committee (Association Canadienne des distributeursetexportateurs de film, 2003). Through organisations like the Coalition on Cultural Diversity, the creative community has also been active in influencing Canadian government’s efforts to work towards a new

international instrument on cultural diversity at the international level.

As for the industry self-regulation, the audience created their own mechanisms for regulating the activities of the media, most especially television. It is a matter of refusing to watch the TV programmes that they dislike. This is more difficult with newspapers, especially in cities where there are only one or two local papers. But in broadcasting, programs that do not capture the interest or imagination of the public or that do not have pleasing or compelling formulas, can die a quick death. It should also be noted that as personal video recorders have begun to make inroads, more Canadians are viewing TV programs 'by appointment'. A variety of audience measurement devices are used to track program success. The Bureau of Broadcast Measurement uses the traditional diary system although it is experimenting with a portable people meter that can detect inaudible codes embedded in the audio portion of TV programs.

Canadians have not been silent witnesses to what they see on television. In 1990, a petition containing 15700 signatures was sent to the federal governments protesting the amount of violence on TV. In 1992, another petition this time with over 1.3 million signatures called for a boycott of violent programming and asked the government to pay an active role in reducing the amount of TV violence. It was not long before Prime Minister Brian Mulroney was drawn into the debate. He referred the issue to a Standing Committee of the House of Commons which held hearings in 1993. Feeling the heat of public complaints. The Canadian Broadcast Standards Council (CBSC), which is supported by the CAB, strengthened its voluntary code of conduct on TV violence in 1994. The CBSC has also developed a code of ethics and a code of conduct with regards to sex-role stereotyping. People who wish to complaints button on their internet site. Complainants are first directed to the broadcaster involved to see if the complaint might be resolved at a lower level. If there is no resolution then the complaint is sent to a regional panel for adjudication. If the council find the favour of the complainant then the broadcaster must make a public announcement of the decision during its prime time programming.

The French Media System

The media system in France belongs to polarised pluralist model of the Hallin & Mancini (2004) typology. The system is characterized by low newspaper circulation as well as elite and politically oriented press. There is high political parallelism in the system, with external pluralism and commentary oriented journalism as the operational principles. Journalistic practice in France is reflective of a wide range of political view points and low level of professionalism, despite the country's long history of democracy. This is why journalistic style in the system emphasizes the commentary approach for the purpose of shaping public opinion more than providing information. Government model of broadcast governance is the control model, with politics playing overriding influence on control. The system exhibits weak professionalism inn media practice and the press is elite-centred, accounting for relatively low newspaper circulation in the country. But the broadcast media are masses-centred. There is a strong state intervention in the system due to the weak economy. In France, the State supports the newspaper industry basically through provision of subsidies (Hallin and Mancini, 2010).

The struggle for the current media system in France dates back to early 1789. Maarek (2008), states that freedom of speech was one of the main claims of the French Revolution, with its famous article 11 which says "Freedom of speech and pinions is one of the most precious Human Right; any citizen may then freely speak, write, print, unless he has to answer for an abuse of that freedom in the specific cases determined by law". Media policy in France is being developed by the national government, assuming a central policy, but is also a competitor in the market place of consumption. This is being done by the government through direct funding and supervision of public broadcasters to provide contents that meet cultural objectives (Mckenzie, 2011).

The main government-related agency for regulation of broadcast in the French Republic is the CSA or Conseil Supérieur de L'Audiovisuel which is translated as Supreme Audio-visual Council. The CSA was formed in the year 1989 out of France's independent regulatory agency established in 1986.

All televisions and radio operations – terrestrial, cable and satellite – fall under the regulatory jurisdiction of the CSA. THE MEDIA IN France are generally independent, but many of them are owned by groups which have interests in other industries. Media ownership in France, joint ownership pattern is followed. The media ownership is shared between the state and other commercial companies. The state is very prominent in broadcasting, while the other companies dominate the print media. This ownership model is a sharp contrast to the British model in which government ownership is low and the American system where ownership is predominantly private. Also, there are some small, newspapers and community radio stations that are run voluntary associations (Pasquier, and Lamizet, 2015). The level of ownership concentration within France's press s lower, compared to the United States media. This is to ensure a diverse group of ownership and less monopolising. There is no company that maintains a dominant market positon nationwide. The French is protected against advertising from supermarkets, lawyers, cinemas, amongst others, as they cannot advertise on television or radio. Radio France is the major commercial station in France's public sector.

Licencing of the mass media in France is mixed. Private broadcast media are licensed by the CSA. Radio stations are licensed for five years while television stations are licensed for ten years (Mckerzie, 2011). The issue

of single entity acquiring excessive influence of the various media is prevented according to the current media ownership rules in France (Vuchot, 2002). Pasquier and Lamizet (2015) believe that the French media policies are centered around media legislation, accountability systems and regulatory authority.

As regards media legislation, an important law about the freedom of the press was passed in 1881. A law dating to 1982 in the audio-visual field made it opened to private operators, and a great number of rules protect freedom of expression for every kind of press in France. Journalists have had to abide by a code of conduct for quite a long time for the purpose of accountability. The national union for journalist, adopted one in 1918. Since 1990, the chairmen of newspapers and audio-visual companies have prepared and imposed new codes on their journalists mostly to avoid legal proceedings and sometimes for ethical considerations. The most remarkable of these has been enacted by regional Western paper, Quest-France, which has inspired many other codes of this kind. Otherwise, a law of 1935 protects the independence of (particularly the so-called clause de conscience, which enables journalist to leave a newspaper whose owner has changed). Advertisers are ruled by the Autorité de Régulation Professionnelle de la Publicité (ARPP), Authority of professional Regulation of Advertisement, and all TV commercials and controlled by the Higer Audio-visual Council.

The Conseil Supérieur de l'Audiovisuel (CSA) allocates licences and frequencies. This regulation board was created in 1989 (later than the Canadian authority which is behind the British and American regulators). It issues emission authorisations and distributes Hertzian frequencies. It is funded by the state and the president of France appoints a third of its full time members. The second third are appointed by the president of the Assembly and the last third by the president of the senate. This makes the CSA a completely government body and the control/regulatory model in France centralized. The license fee for the public broadcasting system is 116 euro. It accounts for two thirds of the budget of public channels. Three quarter of the sum goes to TV while the rest goes to radio. The scope of this authority was being intensely debated in parliament during 2009.

1.1.1 Conclusion

The comparative analysis carried out in this confirms the assertion that the media system in every society is a reflection of the socio-political philosophy of the society, deliberately fashioned after the pursuance of national goals. It is instructive to note that the government is the chief player in shaping a country's media system, though there are various stakeholders interrelating with the system. Passed on the analysis carried out in this paper, which used the Hallin and Mancini's (2004) models of media system as its main tools, there is a sharp divide in the media system of France and the other countries under the purview of this paper. France belongs to the polarised model in which there is a strong government intervention in media operations. This reflects in the country's media ownership, control, political parallelism and media professionalism. The United States, Britain and Canada share the liberal model attributes with the former exhibiting the highest level of liberalism. While the American and Canadian systems exhibit internal pluralism, the British system practices external pluralism. All the liberal systems operate market-driven media system but Britain combines this with a strong public broadcasting. In terms of normative philosophy, all the media system under consideration exhibits traits of social responsibility that calls for self-regulation among professionals. But government control of the media is most pronounced in the French system through subsidies; strong in the British media through government ownership of broadcasting; moderated by the Canadian government's concerns about national identity, which calls for state control on foreign media product; and minimal in the United States. Conclusively, the United States media exhibit full liberal model, Canada, moderate liberal model and Britain, conservative liberal model of media systems. France however operates the polarised media system that allows for pluralism in media operation.

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