

DEBATING THE PROSUMING CHALLENGES TO THE GLOCAL NETIZENS IN THE BULGARIAN MEDIA ECOSYSTEM

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Abstract: The transformations in contemporary media ecosystem require a regulatory balance between access to online content services, consumer protection and competitiveness to be achieved. As part of the Digital Single Market strategy, the European Commission revised in November 2018 the existing *Audiovisual Media Services Directive* as a media regulatory framework for the 21st century in order to adopt fairer regulatory rules for the entire audiovisual sector in the European Union. The aim of the proposed paper is to determine the extent of the applicability of the criteria and the standards outlined in the Council of Europe's *Recommendation on a New Notion of the Media* (2011) in the contemporary communication environment in Bulgaria. Quantitative and qualitative social surveys were conducted in December 2018/February 2019 among journalism students, media practitioners and media experts in order to answer the main research question to what extent the global challenges of ICTs have impacted the national media ecosystem, which encompasses the interaction of all actors and factors for allowing the media to function and to fulfil their role in society. The results of the surveys outline the basis of discussion and analysis of the media trends in the country in multi-layered aspects.

Keywords: media ecosystem; professional criteria and standards, media trends; Bulgaria

Introduction

In the 1930s, Aldous Huxley warned in his *Brave new World* that time would come when mankind may die uninformed, wallowing in a sea of information (Huxley, 1932). That time may not have come yet, but it is a fact that we find it ever more difficult to deal with the quantity and quality of information. And all this makes ever more obvious how compression of historical time dictates the new pace of the communication process in the new Babylon tower with the good, the bad and the unexpected challenges of ICT.

Contemporary societies are undergoing significant social, economic, cultural, and political transformations, which correlate with the dynamic developments of the ICT environment. Today, these transformations are being catalyzed by the intense development of the media ecosystem, combining the traditional media with the potential of the blogosphere, the social networks, and the mobile communication technologies. The netizens, i.e. the citizens of the Net (Hauben, 1995) represent the new globalized way of communication. Situated in the context of globalization processes, the media themselves are undergoing multi-layered transformations; they change with the dynamic developments taking place in technologies, business models, regulatory policies, professional practices, and the behavior of the audiences.

Media remain the most important instrument to promote freedom of expression in the public sphere – an irrevocable condition for the democratic order of society. Actuated by their mission to inform, they stimulate public debates, shape public opinion, promote values and strengthen transparency and accountability of the institutions and businesses, offer educational, entertaining and cultural forms of expression. The power of media, however, can be misused to the detriment of pluralism and democracy.

The rapid developments of information and communication technologies greatly influenced the transformation of the media - from linear to non-linear services, and the audiences - from passive consumers to active

prosumers (producers and consumers). And if the processes of politicization of the media and mediatization of politics are most closely associated with the traditional media (print, radio and television), the online media space (social networks, blogs, vlogs, etc.) makes the audiences active participants in the communication process. Thus, in the new media ecosystem people can enter an unmediated dialogue. While traditional media can rely on codes of ethics, self-regulation and co-regulation in compliance with professional principles, the content in the online environment can hardly be regulated and it is difficult to organize public correction of the politics (Raycheva, 2014).

Among the multifaceted attention to the democratic functioning of the media, two are the essential documents that are directly relating to their regulation on pan-European level since 1989: The European Convention on Transfrontier Television (ECTT) of the Council of Europe and the Audiovisual Media Service Directive (successor of the Television without Frontiers Directive 89/552/EEC) (AVMS Directive) of the European Union. The aim of the ECTT and the amending Protocol is to facilitate, among the Parties, the transfrontier transmission and the retransmission of television program services (Council, 1989). The Audiovisual Media Service Directive has similar objectives, although its intention as an instrument of the European Commission is to create a common market in broadcasting. The AVMS Directive also upholds the basic pillars of Europe's audiovisual model, such as cultural diversity, media pluralism, protection of minors, consumer protection, and intolerance of incitement to racial and religious hatred. (European, 2007).

The applying of the ECTT and the AVMS Directive is very flexible and dynamic and the work on their improvement is an ongoing process. Therefore, it is of particular importance in the digitalized modernity to define what is meant by the concept "media". That is why, on September 21, 2011, after an extensive analytical preparation, the Committee of Ministers adopted a Recommendation to the member states of the Council of Europe to accept a new, wider concept about the essence of media.

The aim of the proposed paper is to determine what is the extent of applicability of the criteria and standards outlined in the Council of Europe's Recommendation on a New Notion of the Media (2011) in the contemporary communication environment in Bulgaria. It envisages to contribute filling the research deficiency on the development of a new, consensual definition of media based on these criteria and standards.

Setting the context

Late modernity is marked above all by the information revolution and the increasing privatization of services. These traits are built into the foundation of postmodern consumerism (Bauman, 1998). New "risk societies" were born (Beck, 2007) and their reflexivity in the ubiquitous global communication streams is based on the circulation of information through networks of users and intelligent machines (Lash, 2002). In the framework of transnationality and consumerism, and with the development of nuclear and electronic technologies, what has acquired increasing importance is the marketing and the sale of goods and services – rather than their production.

Scholars have begun to analyze the effects of *g*lobalization and *g*lobalization*. Thus, is this not a sort of reference to Max Weber's "rationalization" (1998), which Weber originally related mostly to politics and

* *G*lobalization (*g*lobalization = growth + globalization) allows the expansion of ideas to fit the norm of the nation in order to increase their power, influence and profits. *G*lobalization (*g*lobalization = local + globalization) is the interpretation of the global and the local, resulting in unique outcomes in different geographic areas. In: *G*lobalization vs *G*lobalization, 2011. <http://rickleger.wordpress.com/2011/01/04/globalization-vs-glocalization/>

economics? In hypermodern times technologies are revolutionizing culture, which “is no longer in the representations but in the objects, the brands and the technologies of information society”.

The modern globalization processes, based on the impetuous development of information and communication technologies (ICT), have confronted humankind with the challenges that arise from social transformations and the impact of those transformations. Until recently, the one-way communication model of traditional mass media (press, radio, and television) was predominant, but now, real alternatives to it are provided by the developing of multi-directional communication models based on the interactivity of the global digital network. Provoked by the achievements of the so-called second generation of the web-based service Web 2.0, which includes social networks, blogs, folksonomies, and other instruments of communication for joint work and exchange between users, the interaction and co-participation between multiple new individual producers of content is growing exponentially. Although it is very hard to attain the objective truth about certain topics in the Internet space, the Web can satisfy even the most whimsical needs of users within some of the four categories of websites classified by Marc Deuze: news; indexation and categorization; metadata and commentary; and sharing and discussion (Deuze, 2003: 356).

The abundance of diverse information offered to users requires a flexible daily response with regard to the content itself and also with regard to how it is communicated both to more compact and to individual audiences. Media convergence is situated in the field of technological innovations, of computer-mediated communication, and of social networks, and it pushes civic participation and transnational cultural dialogues away from the area of the widespread trend of individual communication. Torn apart between their commercial and political functioning, and restricted by the specificity of their outward form, the traditional media gradually but steadily cede their audiences to the Internet environment. And that environment is changing genealogically.

Among the many definitions of media, the prevalent one defines them as means for transmission of information to multiple recipients. This includes not only the traditional media (radio, television, press) but also films, books, disks, products with wideband technology services and Internet, etc. (Ellmore, 1992).

Dennis McQuail outlines the structure-defining conditions for a free and healthy media environment. They include: absence of censorship, licensing or other control mechanisms exercised by the executive power; equal opportunities of all citizens for media access; independence from control or intervention by owners, political or economic interests; competitiveness of the system, with restrictions on concentration and cross-media ownership; freedom of the media to acquire information from reliable sources (McQuail, 2005:193).

Manuel Castells asserts that “on the one hand, the media must be close to politics and management – close enough to have access to information, to benefit by regulations, and in many countries, to receive substantial subsidies. On the other hand, they must be sufficiently neutral and distanced to maintain their credibility and act as mediators between citizens and parties in the production and consumption of information streams and images that are at the core of public opinion formation, voting and political decision making” (Castells, 2006).

The specificity of the modern information and communication environment imply a change in the concept of media. In 2009, in his comprehensive report to the Conference of Ministers Responsible for Media and New Communication Services (organised by the Directorate General on Human Rights and Rule of Law Legal Issues), Karol Jakubowicz outlines the evolution of the concept of media. Thus, in Recommendation No. R (99) 15 of the Committee of Ministers to Member States on Measures Concerning Media Coverage of Election Campaigns, only two media are referred to – printed and electronic (Council, 1999). Less than a decade later, in the similar Recommendation CM/Rec (2007) 15 of the Committee of Ministers to member states on measures concerning media coverage of election campaigns, special attention is devoted to clarifying the term “media”. This term is said to refer “to those responsible for the periodic creation of information and content and its dissemination over which there is editorial responsibility, irrespective of the means and technology used for delivery, which are intended for reception by, and which could have a clear impact on, a significant proportion of the general public. This could, inter alia, include print media (newspapers, periodicals) and media disseminated over electronic communication networks, such as broadcast media (radio, television and other

linear audiovisual media services), online news-services (such as online editions of newspapers and newsletters) and non-linear audiovisual media services (such as on-demand television)” (Council, 2007). The Directive for Audiovisual Media Services, in seeking a new, more comprehensive, technologically neutral definition of media, devotes considerable space to defining linear and non-linear audiovisual media services (European, 2007).

In 2011, a Recommendation on a New Notion of Media was adopted by the Council of Europe Committee of Ministers responsible for media and new communication services (this Recommendation followed the eponymous Council of Europe Resolution of 2009). The Recommendation addresses the member states that they should “adopt a new, broad notion of media which encompasses all actors involved in the production and dissemination, to potentially large numbers of people, of content (for example information, analysis, comment, opinion, education, culture, art and entertainment in text, audio, visual, audiovisual or other form) and applications which are designed to facilitate interactive mass communication (for example social networks) or other content-based large-scale interactive experiences (for example online games), while retaining (in all these cases) editorial control or oversight of the contents”.

The Recommendation emphasizes the unchanging goal of the media, or of mass communication services similar to the media, to provide or disseminate information, analyses, commentaries, opinions, and entertainment to a wide audience (Council, 2011). This relationship can be seen as an .

Methods

The two main objectives of the research are to determine the extent to which the applicability of the Council of Europe’s criteria and standards for definition of the concept of MEDIA is accepted in the contemporary Bulgarian communication environment. Of these two objectives arise the two research questions on the professional applicability of the more important criteria and standards outlined in the Recommendation. In order to achieve these objectives and to answer the research questions we triangulated in the research design different research methods: individual direct closed questionnaire among journalism students, supplemented by open questions on important media issues; a focused interview with open and closed questions to media professionals; and expert’s evaluation. They were conducted in the period of December 10, 2018 – February 10, 2019.

The individual direct questionnaire among students N=100 was conducted at the Faculty of Journalism and Mass Communication of the St. Kliment Ohridski Sofia University. In addition to the 24 closed questions the students were asked in 4 open questions for their opinion on the specifics of the media ecosystem. The content of these responses has been analyzed in order to understand how young people frame this topic. The most relevant categories of discourse have been discussed with them. The same questionnaires were proposed to journalists from the media and experts. The results of those, who responded, were used to compare with students’ responses. Furthermore, the focused interview with 9 closed and 3 open questions was conducted with media professionals, self-selected on the basis of their spontaneous interest and willingness to participate in the research. Responses were collected from 12 media practitioners: N=3 (press), N=3 (radio), N=3 (TV), and N=3 (online). The experts’ evaluation was collected from 12 University media professors, media executives, and media regulators.

Although non-representative, the conducted surveys outlined the basis of discussion on the application of the Recommendation. The results can contribute to clarifying of the concept of media as well as to the analysis of the media trends in Bulgaria in multi-layered aspects.

Results

Media criteria and indicators

A universally recognized and undeniable feature of media is their role in society and their impact on it, as well as their attitude towards democratic processes. In fact, all kinds of content provided by the media have a potential impact on society.

The Recommendation sets out six criteria for the impact of the media on society, with the proviso that its assessment may be too subjective and should not be considered a determining factor. The criteria are: intent to act as media; purpose and underlying objectives of media; editorial control; professional standards; outreach and dissemination; public expectation. However, as seen in Figure 1, it also provides that not all criteria carry equal weight and that the absence of some of them such as purpose and underlying objectives of media (criterion 2), editorial control (criterion 3) or outreach and dissemination (criterion 5) would tend to disqualify a service from being regarded as media. They outline the limitations of this study.

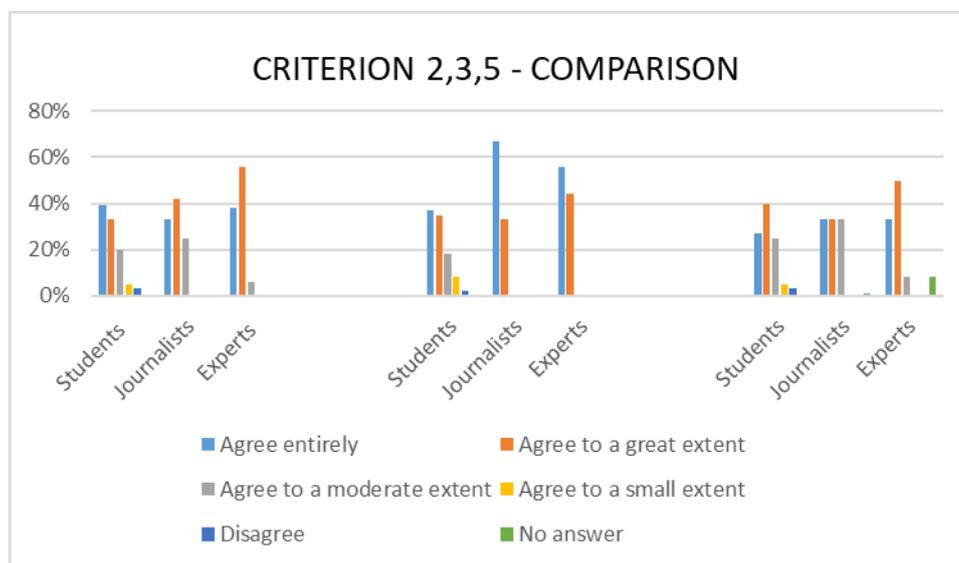


Figure 1: Comparison between Criteria: 2 (Purpose and underlying objectives of media), 3 (Editorial control) and 5 (Outreach and dissemination)

Criterion 2 - Purpose and underlying objectives of media

Media are the most important means of freedom of expression. Regardless of the changes in the media ecosystem, the purpose and the resulting media outcomes as a whole remain unchanged, more precisely - the provision and dissemination of content to the general public and the provision of space for different interactive practices.

The Recommendation foresees for the assessment of this criterion 4 indicators: produce, aggregate or disseminate media content; operate applications or platforms designed to facilitate interactive mass communication or mass communication in aggregate (for example social networks) and/or to provide content-based large-scale interactive experiences (for example online games); with underlying media objective(s) (animate and provide a space for public debate and political dialogue, shape and influence public opinion, promote values, facilitate scrutiny and increase transparency and accountability, provide education, entertainment, cultural and artistic expression, create jobs, generate income - or most frequently, a combination of the above); periodic renewal and update of content.

The responses for this criterion show that there is an approximate consensus among all respondents on its applicability: students - 39%, journalists - 33%, and experts - 38%. The results for those who responded “agree to a great extent” are as follows: students - 33%, journalists - 42% and experts - 56%. The activity with resulting media outcomes is the most essential indicator in the assessment of this criterion by the students. The skepticism of one quarter of the journalists is a bit striking – for 25% of them this criterion is applicable to a moderate extent. Their responses, however, are logical – in fact, they are those who actually work in the conditions of the creation of media content, and these conditions are not clearly outlined in the Bulgarian media reality.

The focused interviews with some of the journalists clarify the reasons for their doubts about the applicability of this criterion – in recent years there has been a tendency towards the problem of the freedom of expression of the media environment. According to the 2018 Press Freedom Index, Bulgaria ranks 111-th out of 180 countries in the world (Reporters, 2018). One of the journalists states: “This criterion can be fulfilled with a certain degree of success. Purposes are sometimes distorted by the pressure of everyday practices, and the final results cannot always be achieved correlatively to the purpose because of the multiple factors of influence and the fragmentation of the communication process”.

On the contrary, the experts seem more optimistic. For one of them, assessing the modern media ecosystem in Bulgaria, the production and dissemination of the media content is of particular importance. For another expert “the main purpose is to create media content that: contributes to a reliable information to the public about important events and facts, and the resulting opinions; to be a fair mediator and to provide space for public debates along with the relevant analyses; to create prerequisites for dialogue between society and politics in terms of transparency and accountability; to promote values, education and culture; to facilitate communication with platforms and applications”.

Criterion 3 - Editorial control

Editorial freedom or independence is a vital requirement for the media and a direct consequence of the freedom of expression, right to opinion and the right to receive and impart information guaranteed by Art.10 of the ECHR. In that context, according to the Recommendation, a provider of intermediary or ancillary service that contributes to the functioning or access to the media but does not itself exercise editorial control and thus has a limited or no editorial responsibility at all should not be considered as media.

Four are the indicators, according to which the applicability of this criterion is verified: editorial policy; editorial process; moderation; editorial staff.

In their responses journalists are strongly convinced of the applicability of this criterion – 67 % agree entirely and 33% - agree to a great extent, experts – respectively - 56% and 44%. The still inexperienced media students are more cautious – 37% of them agree entirely and 35% - to a great extent. Namely, students mark the editorial process as the most essential indicator for this criterion.

The answers in the focused interviews highlight the strong support of the journalists for all four indicators of this criterion. Editorial responsibility is largely accepted as an important criterion for determining the essence of the media functioning.

Similar is the assessment of the experts. In his opinion one of the experts emphasizes that editorial process is the most important for this criterion. For another one “The clearly stated editorial policy is a guarantee of respect of professional standards, as well as for compliance with the media legislation, the principles of pluralism, credibility and accountability and non-admission of censorship”.

Criterion 5 - Outreach and dissemination

Media or mass communication is referred to as mediated publicly-focused public communication opened to all. According to the Recommendation the outreach or the actual dissemination (circulation, number of viewers or users) is therefore an important indicator of identifying what a media is and how it is distinguished from private communication, including the one that is carried out in the public space (which is not a media itself but can be incorporated in the media or mass communication in its aggregate). Technologies that enable non-linear or on-demand content delivery, conditional access, separation of electronically transmitted content, personalization of content or unicasting delivery, give a different dimension of the concept and thus give a new dimension of the mass communication. The same ability to maintain the full (one to many, many to many), group (several to several) or private (one to one) outreach of communication with the public has also Internet. But the fact that such communication is developing on the Internet (public space) does not necessarily mean that it is media.

According to the Recommendation if the outreach and dissemination are limited, the service should not be considered as a media one. That is why it is recommended that for an assessment of outreach, attention should be paid to the aggregated audiences, namely to all those sharing the platform or common features of the service and who can be reached by the content produced, selected, aggregated or distributed by the operator, including when the delivery of or access to content is not simultaneous.

Three are the indicators that are essential for the assessment of the criterion applicability: actual dissemination; mass-communication in aggregate; resources for outreach.

The responses here are very different. The journalists' opinions about the applicability of this criterion are equally divided among the opportunities for „agree entirely” - 33%, to „agree to a great extent” – 33% and agree to a moderate extent 33%. In general, experts accept this criterion positively. The students' opinions are the most diverse. They have indicated as the most essential for the applicability of this criterion the indicator relating to resources to achieve the outreach.

The majority of the journalists expressed their opinion in favor of the applicability of this criterion. One of them stated: “With so much feedback, dissemination management and technologies available, this criterion is achievable”. Some of the media professionals, however, were concerned about the sustaining of the copy- and neighboring rights when disseminating content on different platforms.

As for the expert's assessments they were mostly concentrated around the resources of dissemination as a major prerequisite for actual dissemination.

Standards applied to media in the new ecosystem

While the criteria outlined in the first part of the Recommendation are expected to meet the challenges of time because of their broad nature, the second part is more pragmatic and can be further developed depending on the changes in the media ecosystem. In principle, media and journalists respect the general rules of the civil, commercial, tax or criminal law. It is possible, however, some general provisions to be interpreted specifically for them (for example: offense and defamation; surveillance and search; state secrecy; corporate secrecy) or their application to be critically monitored to avoid its wrong usage with a view to a covert violation of freedom of expression.

In this part of the Recommendation three standards are outlined: rights, privileges and prerogatives; media pluralism and diversity of content; media responsibilities. The purpose is to provide guidance to those involved in media policy how to apply the media standards regarding the new media reality, new services or new entrants. Permanent basis for the implementation of the Recommendation is proposed so that the Member States to be involved in a dialogue with all the participants in the ecosystem and to be properly informed about the applicable law.

The respondents' opinions on the three separate standards provide an interesting material for debate, as seen in Figure 2.

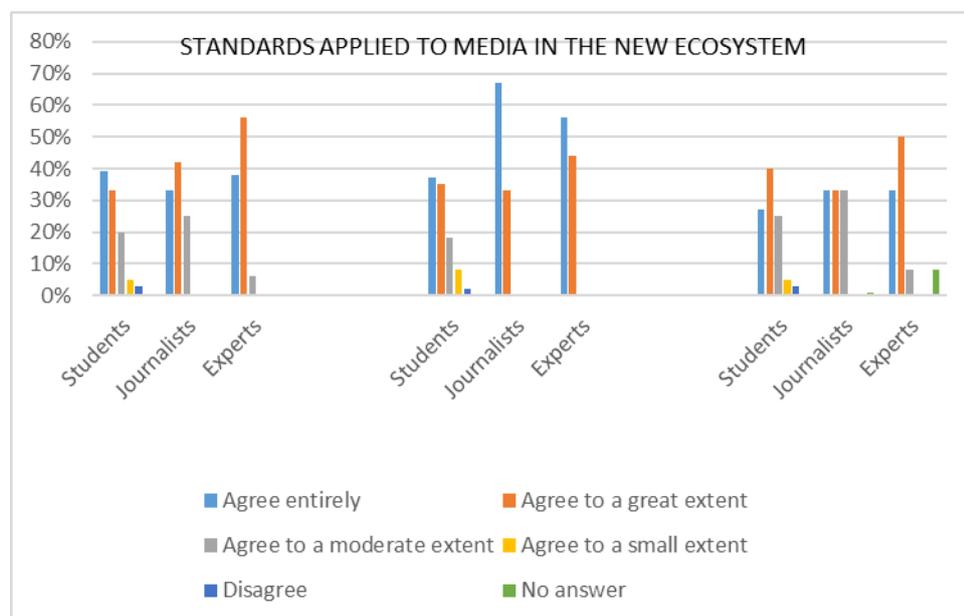


Figure 2. Comparison between Standards applied to media in the new ecosystem

Rights, privileges and prerogatives

Respect for editorial independence requires absence of censorship and protection from self-censorship, but also an effective and apparent separation of the ownership or the media control and decision-making regarding the content by both of its creators and disseminators.

The indicators cover a wide range of media rights: media freedom and editorial independence; freedom from censorship; protection against misuse of defamation laws and risk of chilling effect; right to investigate; protection of journalists and journalistic sources; fair access to distribution channels; intermediaries and auxiliaries.

The discrepancy in the responses here is serious. Experts welcome the possibility of applying this standard, which is placed first in the Recommendation. Half of them (50%) are fully convinced of this. Their optimism is also reflected in the following response – “agree to a great extent” - 43%. Students give balanced responses – 43% agree entirely with the applicability of this standard and 30% “agree to a great extent”. When evaluating the applicability of this standard, they first noted the right to investigate, and second, fair access to distribution channels. Although media professionals are predetermined to comply with the journalistic standards, 38% of them haven’t responded, but 52% accept that this standard is applicable in practice.

According to the Recommendation, significant is the role of the intermediaries, too. By offering alternative and additional means or channels to disseminate media content in a market of competitive intermediaries and service providers, they broaden the outreach of the audience and can significantly reduce the risk of government intervention. But also there is a risk of censorship in the new media ecosystem, triggered precisely through them. All media should be protected from pressure, politically motivated or resulting from economic interests.

The media professionals assert that the right to investigate and to protect journalists and their sources is essential for the media functioning as democratic institutions. Fair access to electronic networks (including hosting services) and ability to rely on the principle of the neutrality of the net should be ensured in the new media ecosystem.

The stress of the assessment of the experts is put on the regulatory framework. One of them states that “all dimensions of the media regulatory framework – editorial independence; freedom from censorship; the right to investigate; protection of journalists and journalistic sources; access to distribution channels, etc. are preconditions for a balanced media ecosystem”. And for another expert important are: cultivation, truth, value.

Media pluralism and diversity of content

Three indicators are pointed out for the assessment of the applicability of these standards: management of scarce resources; transparency of ownership; public service media.

It is noteworthy that 33% of the journalists and 25% of the media experts left the question unanswered. This reaction is probably related to the strong feeling that media environment in Bulgaria is not sufficiently regulated in terms of ownership. The applicability of this standard was addressed positively by 56% of the journalists, followed by students (38%) and finally – by experts (33%). The latter (42%), together with the students (41%) agree to a large extent with the statement. The importance of the public service media is the most essential indicator for students.

Although there are many operators, means and platforms for distribution of content in the new media ecosystem, the scarce resources (such as the radio frequency spectrum), according to the Recommendation, should continue to be regulated and monitored according to the public interest. In situations of strong media concentration pluralism cannot be automatically guaranteed by the existence of a large number of mass media communication entities available to people.

Public service media are the core piece of the European model, which covers the co-existence of the public, commercial and community media. The balanced participation of people of different gender, as well as of representatives of different ethnic and religious groups in the production, editing and dissemination of the media content is a key factor in overcoming stereotypes with regard to all groups constituting the society.

Journalists in general are of great support to this standard. However, some of them are concerned about its applicability. One of them states: “It is achievable, but it again depends on the owners and the media managements, on the goals and the tasks, on the context in which they are placed to work”.

The experts also stress on the need of the transparency of media owners. In her assessment of the modern media ecosystem one of the experts notes: “The diversity of content is at the heart of the interest in the media and media formats. Knowing the owners of the media is as imperative as it is imperative to know the leaders of the political parties and the leaders of the power institutions. Being the fourth estate, media are responsible for its functioning, regardless of its unofficial nature”.

Media responsibilities

In the new media ecosystem, the management, the aggregation and use of information and data must respect the right of people for private and family life, protected by Art.8 of the ECHR. It is also important to respect the intellectual property right.

Media responsibilities include abstinence from hostile speech or other content that incites to violence or discrimination. The Recommendation provides that they have to be vigilant regarding the use of expressions motivated by racism, xenophobia, anti-Semitism, hatred towards women, sexism (including towards people with different sexual orientation) or other biases. Their role is also important in presenting a balanced image of the different groups in society. In this respect, special attention should be paid to the protection of the dignity, security and privacy of children.

Freedom of expression should also apply to commercial and political advertising, the television market and sponsorship. The new situation may necessitate the simultaneous implementation of regulation, self-regulation and co-regulation.

The applicability of this standard is assessed by the following indicators: editorial responsibility; respect for dignity and privacy; respect for the presumption of innocence and fair trial; respect for the right of property; remedies for third parties; hate speech; rights of children; rights of women; rights of minorities; advertising.

53% of the media experts consider this standard as applicable along with all its indicators and another 25% consider it applicable to a great extent. The opinion of students and professionals is almost uniform, 44% and 43%, respectively. Observing the editorial responsibility and protecting children from inappropriate content are the two indicators identified by the students as important media obligations. Journalists again expressed their skepticism, with 37% of them not responding).

Qualitatively, the responses of the journalists focus mainly on the respect for objectivity and pluralism, of refraining from hate/hostile speech, of respect for the dignity and rights of the individual. One of the journalists states: "this is not a matter of achievability", but absolute obligations of the media in a normal society".

The media experts assess in general positively the applicability of such indicators as: editorial responsibility; rights of children, and rights of women of minorities.

The indicators for the presumption of innocence and fair trial; respect for the right of property; remedies for third parties; rights of women; advertising are considered not significant by both journalists and media experts.

Discussion

The significant changes in the media ecosystem, caused by the rapid developments in information and communication technologies and their application to mass communication, are determined by the new ways of disseminating content on a large scale. This often happens at considerably lower cost and with and fewer technical and professional requirements. According to the Recommendation these new features of contemporary media environment include unprecedented levels of opportunities for democratic citizenship due to the interaction and engagement by users. The trend is that they are become prosumers, i. e. active participants and creators of content in online space. Therefore media's intrinsic editorial practices have diversified, adopting new modalities, procedures and outcomes.

From the focused interviews with journalists and the assessment of the experts several important accents have been revealed concerning the functional characteristics of the modern media ecosystem in Bulgaria. The applicability of the three important criteria set out in the Recommendation, as well as the standards applied to the media in the new ecosystem, are of great interest to both the experts and journalists, as well as to the students - all of them being consumers of media products.

It was found from aggregating the responses and comments of all respondents that the periodic renewal and update of content followed by the production, aggregation and dissemination of media content are the most important indicators for the applicability of criterion 2: Purpose and underlying objectives of media. For criterion 3: Editorial control, the leading indicators are the editorial process and the editorial team. Their importance is underlined by the responses of journalists in particular. Under Criterion 5: Outreach and dissemination, the actual dissemination is the leading one. While the experts' opinion on the feasibility of all three criteria is relatively high, and for students relatively moderate, journalists see a peak in the editorial control criterion. This shows that journalists are aware of the importance of their mission to inform audiences according to professional standards.

Leading indicators in the first standard: Rights, privileges and prerogatives are: media freedom and editorial independence. Of the utmost importance in the applicability of the second standard: Media pluralism and

diversity of content, is the indicator related to public service media. In fact, for the functioning of PSB in the best interest of society, most rules are adopted and they are loaded with the most anticipated content by the users in their distribution. A significant part of journalists places emphasis namely on this indicator. The indicator of editorial responsibility in the Media responsibilities standard collects the most support by the respondents. Two other approved indicators are: Respect for the dignity and privacy and Children's rights. Remedies for third parties and Hate speech are the indicators with the lowest support of the respondents. Failure to pay proper attention to the hate speech is a serious sign that the journalistic reflex to intolerance is blunted. As far as the applicability of the standards is concerned, experts are also most optimistic, especially regarding the indicator on public service media performances. For journalists, the second standard: Media pluralism and diversity of content, is particularly important.

The conducted surveys, although with a limited scope, outlined the basis for further research among the media professionals. This broader research scope on the application of the Recommendation can contribute to better clarification of the concept of contemporary media.

Conclusion

The rapid development of information and communication technologies has outstripped the regulatory framework, regulatory practices and theoretical rationalization of the media dissemination process. According to Toffler, this new 'mosaic culture' is characterized by demassification of the media and of society itself (Toffler, 1980). It is becoming increasingly difficult in the new 'yberspace' to protect such democratic achievements as diversity of information sources and pluralism of opinions, disseminated information reliability, possibility of informed electoral choice and protection of minors from inappropriate content. The preservation of the sense of individuality of any one person in a crowd, as well as the development of freedom of choice options, are the most important missions of hypermodernity. A new, virtual online culture has been created that, due to its interactive nature, acts as universalizing and integrating while at the same time having an alienating and restrictive impact on people, thus destroying 'live communication'.

The Council of Europe, with its Recommendation on a New Notion of Media aims to help media policy makers to more effectively and professionally master the transformation processes in today's media ecosystem. Thus, several trends for its developments in Bulgaria can be identified.

- Technologically, the territory of distribution of audiovisual content will continue to expand through communication platforms in a variety of hybrid forms: media, media-like, personal, corporate, etc.
- Economically, the convergence of production and distribution of audiovisual content as well as the emergence of a new type of communicators will stimulate the development of new business models
- Legally, increasingly intense updating of the basic and the elaboration of new documents related to the functioning of the globalizing information and communication medium is yet to be done.
- Socially, technological innovations will bring forth the need of a more serious protection of the fundamental rights and freedoms of citizens (access to information, freedom of expression, diversity of sources, pluralism of viewpoints, protection of minors, etc.), of professional and ethical journalistic standards (provision of informed choice in electoral campaigns, avoidance of hate speech and infringement of personal integrity, etc.).
- Professionally: the multifunctional requirements to journalists acting in the environment of convergent media will increase. Information and communication technologies applications will lead to the further development of the media ecosystem, i.e. to diffusion of blogs with the traditional journalism genres.
- In regulatory terms, public responsibility of producers and distributors of audiovisual media services will have to be ensured by increased efficiency of the combined efforts of regulation, self-regulation and co-regulation while respecting editorial independence and preservation of the public media model.

- Regarding media education, traditional curricula and methods in media specialties will evolve towards the continuing, unlimited by time and space learning. Emphasis should be placed on the development of media and digital literacy curricula.

Improvement of communication technologies can cause radical changes in social order. The meaning of the existence of the nation state is questioned. Indeed, in the new situation, the geopolitical borders are becoming more and more conditional and information superhighways surrounding the planet create prerequisites for global socialization. All these developments and uncertainties place series of challenges to the global prosumers of content in the Bulgarian media system.

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