PART ONE: CONCEPTS

MEASURING MEDIA FREEDOM: APPROACHES OF INTERNATIONAL COMPARISON

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Introduction

Every year on 3 May the 'World Press Freedom Day' is celebrated. It was proclaimed by the UNESCO in 1992, to mark the ratification of the 'Windhoek Declaration'. It was adopted one year later, during a regional UNESCO conference, when media representatives and experts had demanded independence, freedom and pluralism of the press.

Even sixteen years after Windhoek, 3 May is not a red-letter day, a day for joyful statements – rather, it offers the opportunity for critical appraisal. Freedom of the press is an ideal, yet oppression of that freedom is still reality in many places. Furthermore, since September 11 2001, freedom of communication and media has even suffered setbacks, worldwide. The fight against terrorism has often been a plea for constraints of media freedom all over the world. In Russia, the media are controlled and exploited by the president and powerful economic groups; the lives of journalists who gave critical reports from Chechnya were threatened. In China – and not only there – access to the Internet is strictly controlled; critical net activists are arrested. In Iraq the media are still in a sorry state. In Columbia journalists are kidnapped or murdered; in Cuba they are imprisoned on a massive scale.

This list could be continued for some time. In western democracies as well, even in Western Europe and in Germany, there is, here and there, cause for concern, for instance, when editorial offices are searched on suspicion of betrayal of state secrets, or telephones of journalists are wiretapped, or critical coverage of firms is omitted on account of pressure by advertisers. Of course, one has to think in relative terms here: phone bugging operations are alarming, but may not be equated with the arresting of critical journalists; the closing of websites due to pornographic or racist contents does not equate with acts of official pre-censorship in the run-up to elections.

To begin with, it should only be noted that the elementary human rights to gain information from a multitude of various sources and to communicate freely are under threat in many places, in different ways and to different extents. The most massive breaches of these (as of other) basic rights are to be found in those regions which are commonly (albeit in an unduly trivializing or at least strongly abbreviated manner) referred to as the 'Third World' – and particularly in conflict areas.

The International Freedom of Expression Exchange (IFEX) features the most comprehensive collection of breaches to the basic rights concerning communication around the globe on the World Wide Web. It gives numerous current alerts almost daily. That the cases shown on the pages of IFEX usually deal with injustice is not only self-evident but also clear under international law.

Media freedom and international law

Article 19 of the UN Universal Declaration of Human Rights states: 'Everyone has the right to freedom of opinion and expression; the right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media regardless of frontiers.'

These words are worth being remembered again and again. However, Article 19 is only a general manifesto which needs to be substantiated in two ways: first, its content is rendered more precisely by further inter- and transnational conventions, such as Article 10 of the 'European Human Rights Convention' of the European Council (1950), the Helsinki Final Act of the Conference for Security and Co-Operation in Europe (now OSCE) from 1975, the UN Millenium Development Goals, the Conventions of the World Trade Organisation WTO, the International Telecommunication Union (ITU) and other UN sub-organizations, particularly in the various media declarations of the UNESCO. The later ones show how difficult it is to reach a worldwide consensus, even regarding the basic implications of Article 19. The work of the UNESCO communications department was paralysed or overshadowed by disputes over the unconditional 'free flow of information' versus a better-balanced worldwide flow of information aided by a 'New World Information and Communication Order' for at least two decades in the seventies and eighties (see for example Rohn 2002; Breunig 2000).

The second area of implementation or realization of Article 19 concerns national law. Christian Tietje clarifies this in the International Media Handbook of the Hans Bredow Institute: 'Just as in the jurisdiction of the international system in general, so it is in the areas of communication law, the states still being the protagonists as to jurisdiction and its enforcement' (Tietje 2002: 17). Here it can be observed that freedom of communication is part of the basic rights catalogue in almost all constitutions on earth.

A detailed survey was carried out by Christian Breunig in 1994 in which he analysed, amongst other things, the contents of the constitutions of 160 states. 143 states guarantee – or at least guaranteed then – one or more freedom(s) of communication in their constitutions. In sixteen constitutions, freedom of speech was assured explicitly; in 21, the freedom of speech and opinion; in 58, the freedom of the press; in 60, the freedom of information; and in 103, freedom of opinion (Breunig 1994: 308).[1] However, as is often the case, it would be wrong to equate 'quantities to qualities'. Even if freedom of the press is not explicitly mentioned, it does not mean that it does not exist. The term 'press freedom' is not found in the constitution of

Sweden, for example, even though its press enjoys more freedom than in almost any other state on earth. And being printed in the constitution does, by no means, signify that it is implemented *de facto*. That is proven by the example of North Korea, ruled by one of the world's most repressive regimes. Another example: the freedom of broadcasting is only mentioned in two of the constitutions analysed by Breunig's *expressis verbis*: in the German 'Grundgesetz' – and in the constitution of the Islamic Republic of Iran.

Often, constitutions contain limitations to the chartered freedom of communication which 'abrogate the positive content basic rights' (Breunig 1994: 307). And it is not rare for arbitrariness to prevail despite any particular legislation. A comparative law analysis alone, therefore, can not offer sufficient insight into the media situation. This observation is further underscored by the fact that the basic understanding of press freedom can differ significantly.

In authoritarian systems press freedom is often subsidiary to other government aims. In the German Democratic Republic, for instance, one had to look upon freedom of the press as the freedom from economic constraint as well as the possibility (or rather the duty) of taking part in the build up of socialism (see, for example, Holzweißig 1997). In the Development Media Concept, which to this day is advocated at least implicitly in many states of the so-called Third World, the media are, to a certain extent, allocated the task to first and foremost cooperate in the formation of a nation after the era of colonization. According to this view, the media's primary tasks are nation-building and, finally, contributing to social and economic development – pluralism and freedom of the press are often looked upon as second-rate, sometimes even as detrimental (Stevenson 1994: 231–59). For instance, in strongly religious-orientated states, the media almost voluntarily make a taboo out of numerous topics and events. In Turkey there is paragraph 301 of the penal law, which assesses 'defamation of Turkishness' as an element of offence – as many will be aware of after the murder of Hrant Dink and the arguments about Orhan Pamuk.

With reference to Jean-Jacques Rousseau, it can be said that the press is free – but in many places and in many ways, it is in bonds. How can these bonds be more precisely defined? How can freedom of the press and the media situation be focused on in an international comparison?

Comparing media freedom around the world: A short inspection of four surveys

Up until the last four or five years, internationally comparative media research did not, unfortunately, rank very highly, at least in German communication science. In 2002, Hans Kleinsteuber mentioned that it is in a 'yet embryonic state' (Kleinsteuber 2002: 42). Since then the situation has improved,[2] but even in the 'strongholds' of international media research, such as in the United States and in Great Britain, comparison has been only a side show of research for a long time. Methodical problems, such as the general question of various systems being comparable or the exact categories of comparison to be operationalized in comparative research, for the most part, still ,need to be clarified. There is a need for special clarification depending on the subject of research; the complexity is therefore high, the qualifications the researcher has to fulfil, immense. The British Media Researcher Sonia Livingstone points out: 'In personal communication, comparative projects are described as "exhausting", "a nightmare" and "frustrating", though also "exhilarating" or "stimulating"' (Livingstone 2003: 481). Cross-national comparisons are 'exciting

but difficult, creative but problematic' (Livingstone 2003: 478). The field of studies is correspondingly clear. But currently the prominence of comparative media research is growing:

> Funding bodies and policy imperatives increasingly favour comparative research. Stimulated also by the phenomena of globalization and the concomitant rise of globalization theory, researchers in media, communication and cultural studies increasingly find themselves initiating collaboration or invited to collaborate in multinational comparative projects. (Livingstone 2003: 477)

This general result applies also to freedom of the press as the subject of examination. Thus, for a long time, there were only a few international comparative studies to comply with exact scientific demands (see, for example, Holtz-Bacha 2003). In the last few years, this situation has become much better and there is a series of studies which attempt, sometimes extensively, international comparison of the limitations of press freedom. The concrete focus is somewhat different in each case, as is the research instrument.

I would briefly like to introduce four of these studies. I will describe their methodical approach and also mention problems or inevitable shortcomings. Finally, I would like to refer to a few of the results of these studies before reaching a conclusion. The four studies I will briefly present are:

- ■ 'Freedom of the Press: A Global Survey of Media Independence' by Freedom House (last edition: Deutsch Karlekar 2007a)
- ■ 'World Press Freedom Index' by Reporters Without Borders (2007b)
- ■ 'Media and Democracy Report' by the Konrad Adenauer Foundation (2005)
- ■ 'African Media Barometer' by the Friedrich Ebert Foundation in cooperation with the Media Institute of Southern Africa (MISA) (2006/2007).

Other studies worth mentioning are, for example, 'News Media and Freedom of Expression in the Arab Middle East' edited by the Heinrich Boell Foundation (2004) and 'The World Press Freedom Review' of the International Press Institute (2006).

Freedom House: 'Freedom of the Press'
Let us begin with the oldest established survey, the study by the Washington based NGO Freedom House, conducted annually since 1980: 'Freedom of the Press: A Global Survey of Media Independence'. The survey considers communication and media freedom in more than 190 states, according to almost constant criteria and is an 'important instrument for metering continuously the global development of press freedom', as Christina Holtz-Bacha rightly emphasizes (Holtz-Bacha 2003: 408). The survey is published every year on 3 May, the 'World Press Freedom Day', when some media interest is guaranteed. The results are presented in form of brief country reports, an overview article (Deutsch Karlekar 2007b), sometimes some longer reports on special topics or problems, and always global and regional charts and scales. Since 2004, Freedom House compiles a ranking, too, in which every state gets a concrete position in the table of media freedom (or, as the case may be, bondage), although it cannot represent a scientifically correct scaling. The survey always attracts great attention, but it is not

without controversy. For example, it is criticized for incorrect scaling and some methodical difficulties (for example Becker 2003: 109). Furthermore, Freedom House is sometimes accused of having a pro-American bias (for example UN 2001) – not least because more than three quarters of the NGO's resources derive from federal grants of the US government (Freedom House 2007a: 24).

The final most simple, perhaps also most trivial, approach here is to differentiate between free and not free states. This is the approach which Freedom House takes in its annual inquiry. The result for 2007 shows that 72 out of 195 countries and territories examined were rated 'free' (having a 'free' media system), nine fewer than 2001; 59 fell under 'partly free' and 64 under 'not free', two more than six years before. The situation seems even more alarming when one does not differentiate according to the number of states but according to the number of inhabitants: less than one fifth (18 per cent) of the world population of 6.5 billion people live in states with a free press, but more than two fifths (43 per cent) live in systems characterized as not free (Freedom House 2008).

How is the survey carried out? 23 'methodology questions' are bundled up into three top categories. Top category A includes the normative frame: the legal situation comprising laws and regulations which influence the media content. Top category B includes the transformation of the legal status into factual action and the threat to media and journalists, also the political pressure, control by the executive, violence against media, and, generally, the working conditions relevant for the content. Lastly, top category C includes the economic situation, that is the economic pressure and control as well as concentration tendencies which influence contents (Freedom House 2007b).

The worst possible score is 30 points in categories A and C, and 40 in category B. All in all, results are presented within an assessment range from 0 (completely free) to 100 (completely not free). Optimum values not exceeding 12 points are currently reached by Finland, Iceland, Belgium, Denmark, Norway, Sweden, Luxembourg, and Switzerland; negative values of at least 90 points by Eritrea, Burma, Cuba, Libya, Turkmenistan, and – with 97 points, ranking last – North Korea (Freedom House 2007c).

So how are the free, the partly free and the not free media systems distributed on the globe? Freedom House offers a descriptive world map (Freedom House 2007d). 'Free' states are coloured in green, 'partially free' ones in yellow, the 'not free' ones in blue. One recognizes at first glance a conglomeration of blue, that is 'not free' states, particularly in Africa, in the Arabian region, in South and East Asia, as well as in the Caribbean (including Cuba and Haiti) – thus, in large parts of the Third World, though this is in addition to many successor states of the Soviet Union (such as Russia, Belarus, and Moldova, also the only European states). The green areas on the map, on the other hand, concentrate in the highly developed states of the 'North', particularly in North America and Europe. It is a shame, by the way, that a state which has been a founding member of the European Union was only listed as partly free in 2006: Italy under Berlusconi (Freedom House 2006).[3] The new EU member states Romania and Bulgaria were still considered only partly free in the 2007 survey.

Sources for the evaluation of each country were correspondent reports and statements from travellers, research results by staff members of Freedom House, expert inquiries, analyses of reports from aid organisations and public agencies as well as current reports of NGOs, and finally analyses of local and international media themselves. The data is sent to New York and

evaluated there. However, the exact basis of the data and the concrete procedure of evaluation are not made public. Peter Schellschmidt of the Friedrich Ebert Foundation critically remarks: 'The outcome is often far removed from the lived reality in the countries under review. Such surveys are also likely to be incomplete' (Schellschmidt 2005b: 2). For instance, the inquiry does not really include the possibilities of access to the media – and the quality of coverage in the media is hardly considered, either.

Reporters Without Borders: *'World Press Freedom Index'*
The second survey is more limited in its explanatory ability regarding general media freedom and particularly the plurality of the media. The 'World Press Freedom Index' of Reporters Without Borders or Reporters Sans Frontières (RSF) has been published annually at the end of October since 2002. Its focus is much tighter – it is concerned with the endangerment of journalists at work. A ranking of all examined states is compiled as well. In 2007, 169 states were listed. The outcome of the ranking tends to result in findings similar to the (more precise) Freedom House survey. Here, too, the Scandinavian states and Belgium rank as the ten countries with the most freedom – and at the end of the list we again find Burma, Cuba, Turkmenistan, North Korea and – in the last position – Eritrea (RSF 2007b). As to the details, there are, however, some evident differences which can not be referred to here at full length. Just two examples: Slovakia ranks as an excellent third in the RSF index – and only at position 33 in the Freedom House table; the United States are placed at 48 in the RSF ranking – and are ranked at 16 by Freedom House.

The RSF table was drawn up by having at least three experts, mostly journalists, lawyers or scientists, from each country answer a questionnaire consisting of 50 questions.

Their answers were collected in Paris, collated and, where necessary, researched. But the RSF does not disclose who those experts are or how they were chosen – which, of course, is understandable. In the questionnaire, the physical endangerment or threatening of journalists is quite dominant: the first thirteen questions relate to how many journalists in the previous year were murdered, put into jail, tortured, threatened, attacked or had to flee. These questions are allotted up to 49 points of the worst possible score of 122 points. The other 37 questions (for the most part only to be answered with yes or no) aim at the application of certain laws, the dealing with censorship, the state's possession of media and its influence, the possibilities of coverage for foreign journalists and so on (RSF 2007d).

Konrad Adenauer Foundation: *'Media and Democracy Report'*
A much more complex questionnaire has been developed by the political scientist Karl-Rudolf Korte (Duisburg) and his team for the 'Media and Democracy Report' of the Konrad Adenauer Foundation. It was published in 2005. At the beginning of his report, Korte also describes a basic problem of international comparative research in general. 'Every international comparative survey has to deal with the conflict between range (i.e. the generalisation of results) and empirical accuracy. The range of scientific statements increases with the number of objects under scrutiny' (KAF 2005: 13).

Accordingly, he then says about the Freedom House survey:

Causes which are specific to each country are not fully taken into account so that a wide range can be achieved. The studies...provide important data on the global development

...However...they deliver little information about the characteristics of each country that are responsible for a friendly or hostile media climate. Thus, studies with a wide range of indices are of limited use for practical work in political consulting...So far they have been unable to satisfactorily explain different levels of media freedom. (KAF 2005: 14)

When, however, only few countries are included in a study, or only case studies on certain states are carried out, these may turn out to be much more precise but 'To have a small number of cases, however, is also a disadvantage because comparisons cannot be made and the range of generated hypotheses is too low' (KAF 2005).

Therefore, Korte and the Konrad Adenauer Foundation steered a middle course. Only fourteen states were examined, fourteen case studies carried out. The states under scrutiny were Argentina, Belarus, Bolivia, Cambodia, Democratic Republic of Congo, Egypt, India, Indonesia, Jordan, Mexico, Nigeria, Russia, South Africa and Tunisia. The KAF Team elaborated a systematic questionnaire with 30 main questions and numerous questions of detail (KAF 2005: 21–31). They are summed up to five 'main indicators':

- ■ 'General conditions' of the media scene (like the literacy rate, the proportions of state-run and publicly run media, the ownership of media companies and so on)
- ■ 'Legal environment' (freedom of expression, regulation of media coverage, licences, monopolies and cartels and so on)
- ■ 'Political conditions' (for example illegal state repression, self-censorship, obstacles to Internet access)
- ■ 'Economic pressures' (for example state subsidies for private media, economic barriers to establishing a newspaper)
- ■ 'Non-state repression' (for example, the question of whether the state authorities can effectively protect journalists). (KAF 2005: 15–20)

All things considered, this is a very comprehensive approach. However, here too, there seems to be a discrepancy between the sophisticated scientific instrument and its application in research.

As Korte describes:

The KAF Democracy Report is characterised by a qualitative research design. The data was collected by interviewing local experts in the chosen countries using a 'half-open questionnaire'. This choice of experts proved to be advantageous because they were able to combine their detailed knowledge of the political and social situation in each country with an objective standard of measurement. (KAF 2005: 15)

But again, who these experts are is concealed – and probably, unavoidably so. It is by all means possible that the individual KAF offices which carried out the survey *in situ* practised a more pragmatic approach and did not demonstrate the same accuracy in every country. However, the country reports are all fairly extensive – each comprising around twenty pages – and they offer good information. Yet there are differences in regard to certain details. The comparative composition, the conclusions at the end of the publication are, unfortunately, rather

succinct (just about four pages). The conclusions made are not really very profound. For instance, 'Political repression of the media comes in waves', 'Non-state repression and economic pressure pose an increasing threat to media freedom', 'The correlation between the level of media freedom and literacy levels' is weak and 'economic pressures are the main source of self-censorship' (KAF 2005: 312 – 15).

Friedrich Ebert Foundation and Media Institute of Southern Africa: 'African Media Barometer'
Another very sophisticated instrument has been put together by the Friedrich Ebert Foundation (FES) in cooperation with the Media Institute of Southern Africa (MISA) which is the basis of its 'African Media Barometer'. They, too, have decided for a smaller selection of countries: Sixteen sub-Saharan states[4] were examined and finally ranked. But their method is a bit different from the methodical approach of the other studies. The FES explains:

> The process is both simple and intensive. So far, panels of ten people each in 16 countries have met for a retreat over a long weekend: half of them personalities from civil society (academics, trade unionists, clerics from different faith communities, jurists, human rights activists, members of women's groups), the other half working in or on the media (journalists, publishers, media lobbyists, media academics). The panel participants are chosen carefully, depending on the experience, knowledge and merits they bring to the discussion as well as the fact that their word counts for something in their respective societies. They are not just attending another seminar talk shop or answering questions put to them. They themselves are the experts, compiling their knowledge and their assessments in a targeted and focused process. The moderator (the only outsider) has just one part to play: to moderate the discussion. The assessment is determined by the panel participants only. Their guide is a list of 42 indicators, home-grown in Africa and not just made up somewhere in Berlin or Washington. (Schellschmidt 2005b: 3)

Further on, 'benchmarks' have been formulated as 'ideal goals' covering four sectors (Schellschmidt 2005b: 4):

1. Freedom of expression, including freedom of the media, are effectively protected and promoted.
2. The media landscape is characterized by diversity, independence and sustainability.
3. Broadcasting regulation is transparent and independent; the state broadcaster is transformed into a truly public broadcaster.
4. The media practise high levels of professional standards.

At the end, each panel participant could allocate one point to each of the four areas in the worst case and five points in the best case. According to the average value of ten evaluations, a ranking of the sixteen countries was developed.

   All things considered, this seems to be a rather explorative approach. Much comes out of the discussion and depends on the quality of it. And mutual interaction or manipulation of the panel participants cannot be ruled out. A combination with less reactive methods would probably

make sense here – including foreign experts, as well. And again, the quality of coverage in the media is not scientifically analysed.

But the results are, of course, very interesting and the research done by the Friedrich Ebert Foundation has produced a number of good country reports as well.

Problems and shortcomings

Now it would certainly be interesting to go into details of the studies and to compare the evaluation of selected states in each survey. Unfortunately, there is not enough room for that. However, we can conclude that the best rated country in the 'African Media Barometer', that is Mali, also ranked best in the study of Freedom House as the country with the most liberal media system in Africa – at position 51. The RSF also ranked Mali at position 51 – but quite far behind Namibia, Ghana, South Africa, Cap Verde, and Togo (and sixteen places below the ranking in the 2006 survey). This alone reveals that within the various studies there are some differences which are worth looking at scientifically – particularly with regards to the development of an even better research instrument.

An interesting first step into this direction has recently been taken by the American communication scientists Lee B. Becker, Tudor Vlad and Nancy Nusser. In a comparative study they examined four measures – namely those by Freedom House and Reporters Without Borders as well as two other ones which have not yet been mentioned: one by the International Research and Exchanges Board (IREX), situated in Washington like Freedom House, and another one by the New York journalists' rights organization Committee to Protect Journalists (CPJ). Becker, Vlad and Nusser tried to find considerable consistency in the four measurements. In order to do so they carried out a complex quantitative comparative study of the four surveys – and reached the conclusion that there are high correlations between the findings: 'The empirical analyses of the numerical ratings...shows that at least the first three of these organizations largely come to the same conclusions about the media' (Becker, Vlad and Nusser 2007: 18).[5] As 'one of the notable deficiencies of the existing indices', however, it is noted 'that they are heavily oriented toward application. Little effort has been made to define the theoretical concepts being used. Mostly, one must guess about what it is that the organization is actually trying to measure' (Becker, Vlad and Nusser 2007: 19). And, finally, Becker, Vlad and Nusser (2007) conclude: 'The relationship of the existing measures...to other measures is virgin territory. The findings of this analysis suggest it is a territory worthy of exploration.'[6]

Apart from the theoretical challenges, it still seems relatively easy to draw up a catalogue of criteria. A good and comprehensive guideline could be provided, for instance, by 'Media Development Indicators' which were submitted by the International Programme for the Development of Communication (IPDC) of the UNESCO in March 2008. Therein they develop 'a framework for assessing media development' which comprises five principal categories and an elaborate list of key indicators. These principal media development categories deal with the following questions:

- Is there 'a system of regulation and control conducive to freedom of expression, pluralism and diversity of the media'?
- Are there sufficient 'plurality and diversity of media, a level economic playing field and transparency of ownership'?

■ Do the media feature 'as a platform for democratic discourse'?
■ What about the professionalism of journalism? Is there a 'professional capacity building and supporting institutions that underpins freedom of expression, pluralism and diversity'?
■ Is 'the infrastructural capacity...sufficient to support independent media'? (IPDC 2008: 10)

Even if one pinned down what is to be measured and developed an instrument to operationalize it (for example based on these IPDC categories and numerous indicators to be specified in detail and under inclusion of the questionnaires of Freedom House, Reporters Without Borders or the Konrad Adenauer Foundation) there would still remain a vast number of problems in the details.

One little example is that it is certainly a tautology that the murder of journalists is one of the gravest breaches of press freedom and it should be possible to precisely investigate the number of murdered journalists. Yet, it does not appear to be quite that easy.

The Committee to Protect Journalists quotes the number of journalists killed in 2007 to be 64 (CPJ 2008), the Vienna based International Press Institute reports 91 'media employees' murdered in its 2007 census (IPI 2007), the World Association of Newspapers reports as many as 95 (WAN 2007) and the sad number investigated by the Reporters Without Borders is 87 journalists killed plus twenty media assistants (RSF 2007). Why are there such discrepancies? For one thing, it is not consistently defined who should be accepted as a 'journalist' in the statistics: Should cameramen, technical media staff, administrative staff, local couriers, 'part-time reporters' be included? Secondly, a different classification can occur depending on whether a journalist has actually been killed during or because of their work or for other reasons – that is, whether or not they were killed in their 'function' as journalists. And thirdly, it cannot be excluded that not all cases could be investigated.

Conclusion

Methodical problems and difficulties in data collection are numerous, obviously. Therefore, the value of the rankings is limited, at least as far as strong scientific criteria are concerned. The RSF survey is primarily an (expedient) instrument for the purpose of public relations. It is very efficient in bringing public attention to the important concerns and the deserving work of the NGO in the service of freedom of journalists all over the world. The more sophisticated Freedom House survey shows a certain American basic adjustment that could lead to some distortion. The FES inquiry follows an explorative, qualitative approach, which makes it more difficult to generalize the data. And concerning the ambitious KAF questionnaire – as with most of the surveys – we can derive some problems by implementing it in practice.

But all these surveys provide valuable service. Jonathan Becker notes: 'It is at least fortunate that a number of organizations...are tracking developments closely and bringing them to world's attention' (Becker 2003: 112).

What can be deduced from their surveys for future study?

The four presented studies do certainly give good clues for the drafting of a questionnaire. This questionnaire must necessarily be very complex – as complex as the 'phenomenon, freedom of the press'. However, it is equally important that not only is the census instrument very complex, but that during the data collection itself this complexity is not reduced too much. To this end, more than just a few experts need to be included. A multi-methods design seems appropriate: A combination of expert interviews, data evaluations, group discussions

and analyses of media content – and tight cooperation with an international research team. 'International cooperation matters', is one of the core wisdoms from the study of the Konrad Adenauer Foundation (KAF 2005: 312). And this cooperation should work in all phases of the research process up to the examination and interpretation of the results.

Early on, questions like these have to be clarified: What should the concrete avail of the survey be? Should the situation in various countries 'only' be described? Should indicators be found which best serve to indicate the dangers to press freedom? Will it be possible to describe the role of the media in the transition process more precisely? Should the results be of direct use in a political debate? Or should it give valuable clues as to where NGOs or the international community of states can specifically help or intervene?

At any rate, system comparison makes sense in many ways. Thus, specifics of one's own system are only recognizable by confrontation with other systems. System comparisons can also have a heuristic function: questions pertaining to the various systems can be asked, detailed studies stimulated. Comparative science is, therefore, not only basic research but it also allows for showing concrete development chances – and also dependencies. Failures and problems can be uncovered. Thus, specific possibilities of counselling in politics as well as in business may appear. Comparative research in press freedom can, in the ideal case, make a contribution to the improvement of the currently very dissatisfying realization of the elementary basic human right of Article 19, already quoted at the beginning. It is obvious that there are many problems and open questions during research – a long process of discussion is necessary – and certainly some pragmatism as well.

Notes

1. A very comprehensive worldwide comparative study as to the status quo of Freedom of Information, was recently proposed by Tony Mendel (commissioned by the UNESCO). Apart from a general overview on the problem position it contains concrete research on the legal situation in fourteen different states (see Mendel 2008).
2. So some textbooks and miscellanies recently have been published – for example Melischek, Seethaler and Wilke 2008; Thomas 2007; Esser and Pfetsch 2003; Hepp and Löffelholz 2002.
3. Italy was ranked at position 79 with a rating of 35 points. In the 2007 survey Italy enhanced its position, now being ranked at position 61 with 29 points.
4. The countries under scrutiny were Angola, Botswana, Ghana, Kenya, Lesotho, Madagascar, Malawi, Mali, Mozambique, Namibia, Senegal, South Africa, Swaziland, Tanzania, Zambia and Zimbabwe.
5. Only the CPJ measure is not really comparable to the others because its measurements are almost exclusively directed towards 'attacks on the press'.
6. The author is presently working on a more extensive study to explore this 'virgin territory' more closely and to create a better theoretical basis for future comparative studies at the same time.

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