

METHODOLOGIES FOR MEASURING MEDIA FREEDOM. THE BULGARIAN CASE

(Comparative Analysis of the Methodologies used by Freedom House, Reporters without Borders, CMPF, IREX, and AEJ-Bulgaria)

Iliya Valkov¹

e-mail: valkov@unwe.bg

Abstract

This article examines the methodologies used by global and national organizations specialized in the study of media freedom, namely US-based Freedom House and International Research & Exchanges Board (IREX); French-based Reporters Without Borders (RSF); Italian-based Center for Media Pluralism and Media Freedom (CMPF), which is funded by the European Commission, and the Association of European Journalists – Bulgaria (AEJ-Bulgaria). Employing a critical approach and a comparative analysis, this study outlines the approaches and tools used to measure freedom of the media, the social, political and economic factors that influence the results, and the Bulgarian perspective in the indices of these organizations.

Key words: Freedom House, Reporters Without Borders, CMPF, IREX, AEJ-Bulgaria, press freedom, media freedom, index, methodology, comparative analysis, critical approach

JEL: L820, O570, D720

Introduction

As fundamental human rights, freedom of the media, freedom of speech, and pluralism are pillars of modern democracy and essential components of a free and open public debate and access to information. For example, the European Commission has made it clear that Europe's digital future depends on the protection of these rights and the struggle to preserve their integrity [1]. Freedom of the media and freedom of speech are enshrined in Art. 11 of the EU's Charter of Fundamental Rights, adopted in 2010: "The freedom and pluralism of the media shall be respected" [2].

All of this, however, sounds like a nice wish in the context of the increasingly alarming assessments in the annual reports published by international organizations

¹ Chief Assist. Prof., PhD, Department of Media and Public Communications, University of National and World Economy, Sofia, Bulgaria

specialized in the study of media freedom and journalistic independence. But here is the major question in relation to these reports: what is media freedom and how is it measured? How do international and regional organizations manage, using both qualitative and quantitative methods, to paint the global picture not only of the problems in the media sector but also of the state of democratic freedoms and processes in individual countries and regions?

This article focuses on the methodologies used by five global and national organizations specialized in the study of media freedom. There are a lot of think tanks around the world that focus their research on media, media markets, and journalism. But are there any differences in their work?

For the purposes of this article, we are going to look at the studies of five organizations that are most frequently mentioned in Bulgaria and whose reports are quoted in the debates on the problems the Bulgarian media have been faced with, namely the Freedom of the Press Index by Freedom House, the Press Freedom Index by Reporters Without Borders (RSF), the Media Sustainability Index by the International Research & Exchanges Board (IREX), Media Pluralism Monitor by the Center for Media Pluralism and Media Freedom (CMPF), and the studies on media freedom in Bulgaria published by the Association of European Journalists – Bulgaria (AEJ-Bulgaria). Some of these organizations specialize in the measurement of media freedom and protect journalists against pressure and prosecution, while others analyze the development and sustainability of the media environment and the liberal principles in the media market.

In Bulgaria, as well as in many other countries, the findings and conclusions of these organizations' reports trigger public controversy and, often, doubts in their objectivity. One example is Bulgaria being ranked 111th in the Reporters Without Borders' index, which has come to be seen as a popular illustration of the deterioration of the media environment in the country. The findings and conclusions of these reports are used as a basis for criticism against governments, while political elites try to play them down, accusing the nongovernment sector of speculations and partiality.

This brings us to the working hypothesis of this article: one reason for the radical interpretations of these reports is the insufficient knowledge about the organizations that publish them, including knowledge about:

- their historical background;
- their headquarters;
- their sources of funding;
- their area of specialization in media research;
- the scope of their research activities (regional, global, etc.);
- the methodologies they use to gather and process quantitative and qualitative data for their reports and indices;

- potential weak spots in their methodological work.

While the present analysis is by no means comprehensive, it could help reduce the tensions arising from the controversial elements of the indices measuring freedom of speech in Bulgaria, the state's role in this process.

This analysis draws on the official information published on the websites of Freedom House, Reporters Without Borders (RSF), the International Research & Exchanges Board (IREX), the Center for Media Pluralism and Media Freedom (CMPF), and AEJ-Bulgaria. In addition, DW Akademie in 2014 published the guide *Media Freedom Indices: What They Tell Us – And What They Don't*, and in 2020 its author, Laura Schneider, published the monograph *Measuring Global Media Freedom: The Media Freedom Analyzer as a New Assessment Tool*. These two studies on the work of international organizations specialized in media freedom research serve as additional sources of useful information and insights.

Exposition

Who is who?

The Freedom of the Press Index by Freedom House and the similarly-sounding World Press Freedom Index by Reporters Without Borders are two of the most popular media freedom rankings. Both organizations boast a rich history, and through the years their reports have come to be seen as some of the most authoritative sources of information on media freedom and have, thus, been among the most cited ones.

Freedom House is an American nongovernment organization that was established in 1941 through the merger of several organizations with the goal of promoting and studying human rights, freedom, and democracy around the world. The founding team included influential political figures from the ranks of both the Republicans and the Democrats, among them Eleanor Roosevelt, the wife of President Franklin D. Roosevelt, and Republican presidential nominee Wendell Willkie, who ran against President Roosevelt in 1940. The two parties continue to have their representatives in the organization's governing body to this day [3].

Freedom House's role as a democracy watchdog can be seen in play during the campaign of Joe McCarthy, known for his prosecution of communists and people suspected of espionage in favor of the USSR. At the time, the organization was very critical of the witch hunt, the political repressions, and public actions organized by McCarthyism followers. It also supported the Marshall Plan and the creation of the North Atlantic Treaty Organization (NATO) and has assisted various democratic forces in different countries – from Serbia and Ukraine to Kyrgyzstan and Egypt [4].

Most of Freedom House's funding comes in the form of grants from the US government and US and Canadian foundations. During the year ended June 30, 2016, US government grants amounted to USD 24.8 million, or 86% of the organization's revenues [5].

Three decades after it was established, Freedom House started publishing *Freedom in the World*, its flagship annual report on the state of democratic freedoms around the world. In the report, produced by dozens of analysts and expert advisers and usually published in May (Casper, Tufis, 2003), the organization assigns a rating from 1 (the greatest degree of freedom) to 7 (the smallest degree of freedom) [6]. In 1980 Freedom House published the first edition of the survey *Freedom of the Press*, in which it has since been classifying states as 'free', 'partly free', and 'not free'.

French-based Reporters Without Borders (RSF) was founded in the city of Montpellier in 1985 by four journalists, among them are – Robert Menard, Jean-Claude Guillebaud, and Rony Brauman. The organization's name comes from Art. 19 of the Universal Declaration of Human Rights of 1948, which says that everyone has the right 'to seek, receive and impart information and ideas through any media and regardless of frontiers.' Initially, the organization promoted alternative journalism. However, a few years later, there emerged disagreements among its founders. Two of them left and Menard focused the organization's efforts on the protection of media freedom [7].

As a nonprofit, public-interest organization, Reporters Without Borders operates on a budget formed mainly through fund-raising campaigns, public support, and the sale of books of photos and other merchandise. Over 10% of the funding comes from the private sector and from foundations, and close to 10% comes from the French state, the Organization for Security and Cooperation in Europe (OSCE), UNESCO, and the International Francophone Organization (OIF). In 2018, the budget of the organization's Paris office was EUR 6.1 million [8].

Reporters Without Borders published the World Press Freedom Index for the first time in 2002. The organization sends a questionnaire to experts in 180 countries and regions. Based on their responses, it assigns ratings to each country and region. The report covers a period of one year and comes out in January.

The American organization International Research and Exchanges Board (IREX) was established in 1968 following a 1958 joint student-, teacher-, and researcher-exchange initiative of the USA and the USSR agreed by US President Dwight Eisenhower and USSR leader Nikita Khrushchev. The organization's original headquarters were in New York City, but it later relocated – first to Princeton, New Jersey, in 1986 and then to Washington, DC in 1992, where it remains today. It opened its first field office in Moscow in 1989. Today, it has 20 field offices throughout Africa, Europe and Eurasia, the Middle East and North

Africa, Asia, and the Americas, and, together with its partners, works in 120 countries [9].

IREX's work is closely connected to the U.S. Department of State's media programs around the world. The organization aspires to promote and support citizens and institutions in building the foundations of a stable and prosperous society: quality education, independent media, and strong communities. With a global team of 400 people, it has an annual portfolio of more than USD 90 million [10]. Unlike Freedom House and Reporters Without Borders, IREX depends entirely on state funding coming from the U.S. Department of State and the United States Agency for International Development (USAID).

With regards to media and journalism, IREX focuses on journalism training, strategic management, business development and advertising, production of news and other journalistic content, and media law reforms [11].

IREX published the Media Sustainability Index for the first time in 2001, which covered Europe and Eurasia. Since 2005, the index has also covered the Middle East and North Africa. Over the years, more than 500 media experts have participated in the production of the index. *It is important to note that IREX, unlike Reporters Without Borders, does not measure media freedom and instead assesses the sustainability of the media environment in individual countries and regions – that is, the media's ability to fulfill its functions as a fourth estate.*

Currently, the Media Sustainability Index covers 80 countries in Europe and Eurasia, the Middle East and North Africa, Sub-Saharan Africa, and Asia. IREX publishes the results online, as well as in a print edition, in which it devotes a chapter to each country. The report on the sustainability of the media environment in Europe and Eurasia comes out every year, the report on Africa is usually published for a period of two years, while the reports on the other regions come out sporadically. The Media Sustainability Index is to be replaced by the Vibrant Information Barometer in 2021.

Based in the European University Institute (EUI) in Florence, Italy, the Center for Media Pluralism and Media Freedom (CMPF) was founded in 2011 for the purpose of studying the problems related to media freedom and pluralism in Europe and neighboring countries such as Serbia, Northern Macedonia, Albania and Turkey (2017), supporting national and European lawmaking processes, and encouraging discussions on media environment problems among academics, opinion leaders, representatives of regulatory bodies, media owners, and journalists [12].

Funded by the European Commission and EU programs such as Erasmus+, the CMPF is part of the Commission's efforts to improve the level of media pluralism and media freedom in Europe. The center's website provides no information about its budget. The Media Pluralism Monitor (MPM) is a research tool developed by the center to assess the risks for media pluralism in a given country. The CMPF

has produced three MPM reports on Bulgaria (2016, 2017, 2020) in partnership with the Freedom Democracy Foundation (Спасов, Огнянова, Даскалова, 2016, 2017).

Overall, the center has completed media pluralism monitoring sessions covering EU and neighboring countries for every year from 2014 to 2019.

The MPM covers a wide range of media environment problems, including freedom of speech, media pluralism, the rule of law, media laws and policies, the participation of the media in the democratic process, and the media market and its economic aspects, including regulations and freedom of access, concentration, transparency of ownership, and access to information and media services for different social groups [13]. The monitoring has four categories. The researchers assign a risk score for each category for each country – low risk, medium risk, or high risk. They then publish a report on each country, along with a report on the overall situation in the European community.

The Association of European Journalists – Bulgaria (AEJ-Bulgaria) is a nongovernment organization founded by journalists in 2010. It is a member of the international Association of European Journalists (AEJ) – an independent nonprofit organization founded in 1962 by 70 journalists from six Western European countries that today has sections in more than 20 European countries, including non-EU Member States such as Armenia, Belarus, Moldova, Serbia, Turkey, and Ukraine [14]. AEJ-Bulgaria aims to protect professional journalistic standards, improve the media environment and the quality of journalism in the country, and support journalists who are subjected to pressure and threats and, thus, cannot perform their work freely [15].

AEJ-Bulgaria organizes trainings for journalists and journalism students, advocates for journalists in professional cases, including by seeking international support, proposes changes to laws, promotes media self-regulation, and issues critical positions on violations of freedom of expression, media abuses, and journalism ethics. Over the years, the organization's research team, in cooperation with university professors, has conducted various studies on the media environment in Bulgaria in an effort to contribute to its improvement [16].

For its funding, AEJ-Bulgaria depends mainly on grants. In recent years, it has received financial support from the America for Bulgaria Foundation (BGN 308,000 in 2018, BGN 148,000 in 2019), UNICEF (BGN 119,360 in 2018, BGN 136,000 in 2019), and the Friedrich Naumann Foundation (BGN 20,000 in 2018) [17]. It has received grants from other organizations as well, among them the embassies of the Netherlands and the USA.

AEJ-Bulgaria conducted its first study on the media environment in Bulgaria in 2011. Since then, it has conducted four more editions of the survey – in 2013, 2015, 2017, and 2020. The studies, in which only professional journalists are allowed to participate, take place in the spring of the given year, and the results

are published in the fall of the same year. While the first survey drew responses from 113 journalists, the latest survey was based on the participation of almost twice as many journalists – 204 [18]. Even though AEJ-Bulgaria's studies do not include an index and do not use measuring scales, they still shed light on Bulgarian journalists' perceptions of freedom, the dominant forms of pressure in the media, and the current problems faced by the professional community.

What do the different indices measure and how do they do it?

The methodological frameworks used by well-established international organizations have changed over time. Freedom House's reports from the 1980s are hardly comparable to the reports the organization has published in the past two decades. The same is true for Reporters Without Borders, which has, along the way, refined the questionnaires and databases it uses in the preparation of its index. Before they adopted the current form of their questionnaire, which contains 200 questions, the CMPF researchers' pilot-tested it in nine countries in 2016 to find a working format for each country.

Freedom House

Since 2002, Freedom House has been using 23 methodological questions grouped in three categories:

Legal environment: This category covers the existing laws and regulations that have an impact on media content and the government's readiness to use legal instruments to exert influence on the media. The questions concern the level of protection of fundamental human rights, the level of independence of the judicial system, and the opportunities for entry into the media market.

Political environment: This category assesses the degree of political control over media content, including control over sources of information, the presence of censorship and self-censorship, citizens' access to a wide range of media, and journalists' safety.

Economic environment: This category explores the effects of economic factors on media ownership, concentration of media ownership, distribution restrictions, and the degree of control exercised over the media through advertisers and subsidies (Schneider, 2014, p. 14).

The 23 methodological questions are broad in scope so that they can be applied to every country in the world. To identify each country's specificities, Freedom House supplements each question with several sub-indicators, which brings the total number of questions to 109. In this way, the organization directs the respondents' attention to the problematic areas they should focus on.

In the methodology used by Freedom House, the Political Environment questions have a greater weight than the questions in the other two categories and a different impact on the final results [19]. The ratings ‘free’, ‘partly free’, and ‘not free’, which the organization used before it changed its methodology, run along a spectrum from 0 to 100 points – 0 – 30 points (free), 31 – 60 points (partly free), and 61 – 100 points (not free).

Who fills out Freedom House’s questionnaire? The US organization uses the general term ‘analysts.’ A third of them are Freedom House employees working in its headquarters in Washington, DC. The other respondents are external consultants, including researchers and university lecturers, experts from nongovernment organizations, and journalists.

Each analyst assesses three to five countries. Only a quarter of the analysts live in the country or region they assess. However, another quarter of the researchers are born there (Schneider, 2014, p. 14). Freedom House has no criteria in relation to the sources of information the analysts use in their reports but once the analysts answer the main methodological questions, they discuss them at regional meetings bringing together analysts and Freedom House representatives to ensure a kind of secondary control. The conclusions and the new ratings are compared to those from the previous year. If there are dramatic deviations, they are analyzed in greater depth. However, the final rating is assigned by one analyst, and this same analyst assigns a rating to several countries. This is one line of subjectivity in the methodology, since the majority of the analysts are based in the USA (Schneider, 2014, p. 44). As a result, the conclusions about the other countries are rooted in a subjective, US perspective. This is a key argument the critics of the Freedom House’s index use against it – some see the index as an attempt to attack their political regime (Schneider, 2014, p. 15).

In addition, neither the names of the respondents nor all the methodological questions are publicly available. Other weak spots in the methodology include the great weight assigned to political factors.

At the same time, Freedom House’s index is one of the oldest instruments for the measurement of media freedom in the world, allowing for the detection of trends over a period of more than 30 years. It provides detailed information about every country that is monitored, outlines problematic areas, and allows for comparisons between countries and regions.

Reporters Without Borders

Unlike Freedom House’s index, the Reporters Without Borders’ index focuses on the problems of the professional journalistic community and tries to measure ‘freedom of information’ – a term that the organization uses a lot more than ‘media freedom’ or ‘freedom of the press’ As Laura Schneider points out, one of

the weaknesses of the Reporters Without Borders' methodology is that the French organization offers no definition of 'media freedom' (Schneider, 2014, p. 20).

From 2002 to 2013, the Reporters Without Borders' questionnaire contained 44 questions focused on violations of rights and crimes against the person of journalists, including questions about the numbers of beaten, arrested, kidnapped, and murdered journalists. In 2013, the organization started compiling this information separately and it now bears an ever greater weight on the final results. As of 2019, the questionnaire contained 87 questions, allowing for a deeper analysis [20]. The questionnaire, first published in 2016, spans six categories [21]:

Pluralism: the degree to which different viewpoints are presented in the media;

Media independence: the degree to which the media depend on the state;

Environment and self-censorship: the environment journalists work in;

Legal framework: the quality and effectiveness of the laws;

Transparency: public institutions' level of transparency;

Infrastructure: the quality of the media infrastructure and the opportunities for entry into the media market [22].

In the current format of the questionnaire, most questions do not ask for simple 'yes' or 'no' answers but for assessments on a scale from 1 to 10. Here is an example:

How easy is it for the government to force the removal of:

- a journalist at the public radio or television;
- a manager at the public radio or television;
- a manager at a private media.

One of the big advantages of the Reporters Without Borders' methodological approach is that the questionnaire is available in 20 languages. It is sent to partner organizations all over the world – 18 nongovernment organizations on five continents that send the questionnaire to their network of about 150 respondents. Perhaps for safety reasons, like the Freedom House respondents, the Reporters Without Borders' respondents are not publicly known. However, the organization points out that the group includes journalists, researchers, and law and human rights experts. An important feature of the index is that all respondents live in the country they assess, although close to 10% of them are foreign correspondents born elsewhere (Schneider, 2014, p. 20). At the same time, similar to the dominant US presence among the Freedom House respondents, the Reporters Without Borders index is marked by the strong presence of European viewpoints and criteria for freedom of speech. In addition, the decisions about the questions, the categories, and their weight in the assignment of the final ratings are taken by a small number of people living in France or with European backgrounds (Schneider, 2014, p. 21). As a result, despite the organization's aspiration to paint a credible global picture, the number of questionnaires filled out in European countries is several times greater than the number in African countries.

After the completed questionnaires are collected, each country receives two ratings – one rating on the basis of the questionnaires, with ‘pluralism’ carrying greater weight than the other categories, and a second rating based on the use of violence against journalists. This means that there are seven categories in total, the last one of which accounts for 20% of the overall rating. In the end, the countries are ranked according to their final ratings (Schneider, 2014, p. 21).

Compared to Freedom House’s study, the Reporters Without Borders’ study appears to be more focused on the problems of the media environment and particularly on the challenges, difficulties, and pressure faced by professional journalists. This thematic focus, however, does not eliminate all sources of subjectivity. There remain unanswered the questions as to how respondents are selected, who they are, and how they guard themselves against emotional attachments and partiality in the assignment of the final ratings. Does this state of affairs not pose a risk of creating a closed environment?

The other source of controversy with regards to the Reporters Without Borders’ index is the great weight given to the use of violence against journalists. This often leads to distortions in the depiction of the current situation and can also lead to misuses. Countries with higher levels of violence can receive negative ratings, no matter if a journalist has suffered violence because of his work or for other reasons. Antoine Héry of Reporters Without Borders says that the violence indicator is a leading factor and the analysts are interested in whether journalists and bloggers can disseminate information freely. ‘We do not take into account the quality of the contents they spread.,’ Héry says (Schneider, 2014, p. 23).

The case of Bulgarian journalist Viktoria Marinova offers a telling example. She was brutally murdered in the city of Ruse but the investigation has proven that the crime was not connected to her work as a journalist. Yet, Reporters Without Borders issued a special statement about the case [23]. Such incidents create a precedent interpretation and influence the rating of the respective country. It is a common practice of the French organization to note in its reports how a single murder has led to a significant drop in a country’s rating in the course of just one year (Симеонова, 2019).

IREX

IREX’s Media Sustainability Index assesses five factors determining the maturity and sustainability of media systems [D1][24]. Each factor is complemented by specific indicators that are tracked and analyzed for individual countries and regions.

The first factor is **protection of free speech**. The indicators analyzed here include existence of legal and social protections of free speech, whether the process of media licensing and registration protects the public interest and is

fair, competitive, and apolitical, and whether market entry and tax structure in the media sector are fair and comparable to those in other industries. Researchers further analyze whether crimes against media professionals, citizen journalists, and media outlets are prosecuted vigorously, whether the law protects the editorial independence of public media, whether public officials are held to higher standards in libel cases, whether public information is easily available, and whether the entry into the journalism profession is free or the government imposes licensing, restrictions, or special rights for journalists.

The second factor is **quality of journalism**. The key indicators are whether journalists cover major events and issues fairly and objectively, whether they use diverse and credible sources, whether they follow recognized and accepted ethical standards, whether journalists and editors practise self-censorship, and whether journalists and media professionals receive a good enough pay so that they do not succumb to corruption and stay in the profession. Other indicators include the proportion of entertainment programming vis-à-vis news and information programming and the degree to which there is quality niche reporting and programming, such as investigations and in-depth coverage of economic, business, political, and local issues.

The third factor is **plurality of news sources**. Researchers seek to find out whether there is plurality of public and private news sources (print, broadcast, online, mobile) that offer multiple viewpoints, whether citizens have free access to domestic and international media, and whether the public media reflect the views of the political spectrum, are nonpartisan, and serve the public interest. Other issues of interest include the extent to which independent news agencies gather and distribute news for media outlets, whether private media produce their own news, the level of transparency and concentration of media ownership, and the extent to which a wide range of social interests, including minorities, are reflected and represented in the media.

The fourth factor is **business management in the media industry**. The indicators concern the media's operations as efficient and self-sustaining enterprises that receive revenue from a multitude of sources, the extent to which advertising agencies and related industries support an advertising market, whether government subsidies and advertising are distributed fairly and in line with the law without undermining editorial independence and distorting the market, and the reliability of broadcast ratings, circulation figures, and Internet statistics.

Finally, the fifth factor is **the functioning of supporting institutions in the professional interests of independent media**. Here, the researchers assess the degree to which trade associations represent the interests of media owners and managers, and professional associations protect journalists' rights and promote quality journalism, whether nongovernment organizations support free speech and independent media, and the existence of quality degree and short-term

training programs that equip journalists with the skills and practical experience they need. Another set of indicators in this group concerns the unrestricted access to sources of media equipment, newsprint, printing facilities, channels of media distribution, and information and communication technology infrastructure [25].

Together, the five factors and the indicators complementing them produce a scale for the assessment of media systems. In employing this methodology, IREX assumes that the rating is based on commonly recognized principles conducive to the building of an effective and independent media environment. This approach allows for an in-depth assessment of the media industry through an analysis of the key factors determining whether a media system is transparent, professional, and economically sustainable.

Who fills out the questionnaire? The Media Sustainability Index is produced with the support of a panel of local experts in each country. Each member of the panel fills out the questionnaire, assigning a score to each indicator and providing written comments. Then, the panelists gather together for a group discussion under the supervision of a moderator, usually a representative of the host-country partner organization or a local individual. IREX's role is to support the process and ensure that the methodology is used properly. The organization has the right to conduct additional research on the media environment and give its own scores that have the same relative weight as the scores assigned by the respondents – in other words, if the panel consists of 12 experts, IREX is treated as respondent number 13.

Panelists score each indicator on a scale from 0 to 4, using whole or half points (e.g., 1.5, 2.5, 3.0, 4.0). A score of 4 is assigned only if the indicator and all accompanying questions have demonstrated long-term stability and no public or political fluctuations are likely to undermine the positive trend. By contrast, a score of 0 is assigned only if government or social forces actively oppose the implementation of the indicator. The average scores of all indicators are averaged to produce overall scores for each of the five factors, which are then averaged to obtain an overall score for each country. According to IREX's interpretation, a media system can be classified as:

- **unsustainable, anti-free press** (0 – 1);
- **unsustainable mixed system** (1 – 2);
- **near sustainability** (2 – 3);
- **sustainable** (3 – 4).

IREX's scoring process is completed in two stages. First, each panelist receives the questionnaire, reviews it, and scores each indicator. Then, the panelists come together to discuss the five main factors and the accompanying indicators. They are allowed to change their scores during the discussion, which could lead to variations as a result of group pressure and conformism.

Compared to Freedom House's information gathering process, IREX's methodology has a major advantage because it relies on local experts. The up to 12 panelists for each country come from media outlets, NGOs, professional associations, and academic institutions. IREX tries to ensure that the panels include representatives of different types of media, representatives from the capital city and other parts of the country, and representatives of different genders and ethnic and religious groups in the hope that this diversity can have a positive effect on the study. In addition, panelists are encouraged to write their names when filling out the questionnaire, which definitely boosts the credibility of the report [26].

IREX notes that the transparent indicators and scoring process and the recruitment of local experts and moderators contribute to the success of the Media Sustainability Index as a research instrument. The outcome constitutes an in-depth and nuanced assessment of the media environment in each country, which, according to the organization, is only attainable when local experts share their expertise [27].

At the same time, the fact that a single IREX 'analyst' assigns the final score for each country and region based on the scores assigned by the respondents raises serious doubts, not least because there is no way for an employee of the organization to be familiar with the media problems in each country. For example, for the purposes of the index, Europe and Eurasia span a total of 30 countries, among them Bulgaria, Turkey, Russia, Albania, Serbia, Moldova, and even Tajikistan, Turkmenistan, and other countries with complex political systems [28]. What is more, this approach assumes the possibility of an official disqualification of opinions and scores of respondents in each panel.

IREX is almost entirely funded by the US government, which often raises doubts about the objectivity of its research results. Nevertheless, the indicators analyzed in the research process provide a broad but also detailed assessment of the problems of each country's media system, and shed light on the state of professional journalistic standards and practices, media content, and media markets.

Media Pluralism Monitor

The Media Pluralism Monitor published by the Center for Media Pluralism and Media Freedom (CMPF) at the European University Institute (EUI) in Florence, Italy, is a very detailed and highly theorized tool for the analysis and assessment of the media environment in the EU Member States, as well as in neighboring countries and prospective EU Member States such as Montenegro, Albania, and Turkey. As a study funded by the European Commission, the Media Pluralism Monitor is bound by the EU institutions' interests and policies.

The CMPF partners with experienced independent researchers from the countries covered by the survey, who collect the data and prepare the reports. Its Bulgarian partner is the Media Democracy Foundation, with Orlin Spassov, Nelly Ognyanova, and Nikoleta Daskalova as lead researchers. In Malta and Italy in 2016, the CMPF collected the data in a centralized fashion. In addition to individual reports, the center also publishes a report on the overall media environment in the European community based on the results from the countries featured in the study.

Who fills out the questionnaire? The questionnaire for each country consists of 200 standardized questions [29]. Each partner organization has the right to select seven national experts who can participate in discussions and answer ‘questions of markedly rating nature’ (Спасов, Огнянова, Даскалова, 2016, p. 1).

The CMPF’s methodological framework categorizes risks for media pluralism in four main areas, which are assessed according to the scoring of 20 indicators (five for each area).

- **Basic protection:** protection of freedom of expression; protection of right to information; journalistic profession standards and protection; independence and effectiveness of the media authority; universal reach of traditional media and access to the Internet.
- **Market plurality:** transparency of media ownership; concentration of media ownership (horizontal); online platform concentration of ownership and competition enforcement; media viability; commercial and owner influence over editorial content.
- **Political independence:** political independence of the media; editorial autonomy; audiovisual media, online platforms, and elections; state regulation of resources and support to the media sector; independence of public service media governance and funding.
- **Social inclusiveness:** access to media for minorities; access to media for local/regional communities and community media; access to media for people with disabilities; women serving as managers, executives, and editors-in-chief in public service and commercial media; media literacy.

The results for each area and indicator are presented on a scale from 0% to 100%:

- **Low risk** (between 0% and 33%)
- **Medium risk** (between 34% and 66%)
- **High risk** (between 67% and 100%)

Along with the results from the questionnaire and the expert discussions, the reports for each country also include current context-setting data from official sources, such as Gross Domestic Product (GDP), unemployment rate, demographic indicators, economic and political conditions, the state of the

media market, and citizens' access to the Internet and media services (Спасов, Огнянова, Даскалова, 2016, p. 2).

Noteworthy, in its efforts to present a complete picture of the current situation in each country, the CMPF cites the media freedom indices published by Freedom House, Reporters Without Borders, and IREX, as well as reports published by NGOs from the media sector.

Perhaps this is the most valuable aspect of the Media Pluralism Monitor – it establishes a general standard for the assessment and monitoring of media pluralism in the EU as a whole, and it is supposed to be politically neutral and objective.

An important feature of the monitor is its coverage of a wide range of problems, including legal framework, media market, social issues, the role of the state, independence of the media, geographic distribution of the media, and so on. This panoramic view is combined with an in-depth analysis. All conclusions reached by the teams must be supported with facts.

Besides, the monitor has evolved over the years. 'The accumulated experience is analyzed and the tool is being improved all the time,' says Orlin Spassov, the leader of the team preparing the report on Bulgaria [30]. In recent years, the authors of the study have put far stronger emphasis on the problems in the digital media environment – a phenomenon that reflects the growing importance of this sphere to the development of the EU's media practices.

Despite its positive features, the monitor's methodology has several drawbacks. The indicators assessed, though extensively developed, cannot cover all possible cases in each country. 'For this reason, in practice one often cannot answer the questions about specific problems in a given country included in the questionnaire, although there are important specificities that deserve to be discussed,' says Spassov [31]. In his view, it would be helpful if the questionnaire allows for more open answers that should be taken into account when the overall score for each country is calculated (greater application of qualitative methods in the study).

The EU Member States differ from one another when it comes to the collection of statistical, market, and other data on the media environment. As a result, some of the national teams have difficulty collecting such data or even face the prospect of finding no data on some aspects of the media's operations (e.g., publicly available information about circulation figures, etc.). In other cases, the data is not reliable enough. All of this, to a degree, makes it hard to compare individual countries.

Similar to the practices of Freedom House and Reporters Without Borders, the national research teams the CMPF partners with have no access to the tools used in the calculation of the final scores for the countries and do not participate

in the process. Instead, this process is managed centrally by the CMPF's team in Florence on the basis of the country reports and the responses to the indicators. 'It would be helpful to provide feedback to the national teams at this final stage,' says Spasov [32].

The section about the study's methodology states that the responsibility for the report's content does not necessarily reflect the views of the CMPF or the European Commission. On the one hand, this gives the national teams extensive freedom in conducting their research. On the other hand, this disclaimer can serve as a convenient excuse for the European Commission in case the report on a given country is attacked or criticized by the government or by political and economic circles disagreeing with its findings.

AEJ-Bulgaria

The study conducted by the Association of European Journalists – Bulgaria (AEJ-Bulgaria) focuses on the problems that the journalistic community in the country faces. While it has a national scope, it is not representative. One of the study's main goals is to provide a snapshot of the media environment in Bulgaria, the level of freedom of expression, and the journalists' assessment of their work, according to the methodological note of the 2017 report (ВЪЛКОВ, 2017). The organization guarantees the respondents' anonymity. The survey's findings are presented in summarized form in a report published in Bulgarian and English.

AEJ-Bulgaria has conducted five surveys since 2011, with the 2017 and 2020 editions attracting a record number of respondents – about 200 journalists from around the country. The main data collection tool is a questionnaire comprising 22 open- and closed-ended questions, which is available for completion for a month starting on May 3 (World Press Freedom Day).

The questionnaire can only be completed online via AEJ-Bulgaria's website. The team in charge of the study expects most of the respondents to be journalists, editors, editors-in-chief, media managers, media experts, lecturers, and journalism students. However, since there are no restrictions in place, the questionnaire can also be filled out by people who are not part of the media community but are interested in its problems.

There are several fundamental questions that have been included in all surveys so far. Other questions are included in the survey to shed light on the current political, social, and economic environment. For example, the 2020 questionnaire has two closed-ended questions concerning the impact of the coronavirus pandemic on the media's operations.

The questionnaire is developed by AEJ-Bulgaria's research team in consultation with leading sociologists. The questions are grouped in several categories:

Working conditions: This category assesses the changes in the working conditions in the media, the average age of active journalists and the level of gender balance in newsrooms. It also examines whether there is significant personnel turnover in the media, whether journalists enjoy stable incomes, what contractual relationships they have with the media they contribute to (employment contract, civil contract, fees), and which parts of the country most of the media are concentrated in.

Culture of pressure: This category assesses the various forms of ‘illegitimate pressure’ which, according to AEJ-Bulgaria, constitute ‘a threat to the physical, financial, and moral integrity of the journalist.’ Here, the researchers seek to find out whether the respondents have witnessed illegitimate pressure or whether they themselves have been subjects to such pressure, whether they have experienced interference in their work by beat editors, editors-in-chief, the owner of the media, or the outlet’s advertising department, whether there are cases of external interference in the media’s editorial content by political, economic, and criminal subjects, and whether they have practised self-censorship or know about colleagues who have.

Media and power: This category assesses the relationships, if any, of a media outlet with the local government. It also looks at whether the media publish ready-made press releases by institutions in exchange for a payment, what professional standards the media adheres to during elections, whether it participates in defamatory PR campaigns, and what impact critical publications have on the media’s relationships with state institutions, including whether there have been cases where the media has been denied access to information. The respondents can assign a score to the level of freedom of expression on a six-point scale. In 2020, the answers are divided in two groups: 1) excellent, very good, good; 2) medium, bad, very bad.

Self-reflection and changes: This category asks the respondents to choose from among several options the most important measures that can be taken to improve the media environment in Bulgaria. The last question is open-ended, giving them the opportunity to share if they have been victims of illegitimate pressure or know about colleagues who have.

AEJ-Bulgaria’s research efforts are hardly comparable to those of international organizations with long track records, institutionalized authority, and global reach. Its studies have the advantage of offering a snapshot of the current state of the media environment in the country based on the assessments of quite a few active journalists and media experts.

Although it is not representative according to professional sociological standards, AEJ-Bulgaria’s study is one of the few surveys trying to provide a relative behind-the-scenes glimpse of the dynamics of the Bulgarian media

environment. To an extent, these efforts are comparable to the studies by Reporters Without Borders which, in its reports, also analyzes perceptions of freedom of speech and the various forms of pressure experienced by journalists.

AEJ-Bulgaria's study has its weak spots as well. It is difficult to find out whether the questionnaire is filled out by real journalists. At the same time, the questions are not sufficient to provide a bigger picture of the problems of the media environment. Lastly, 'the publishers' wars' and the discord between the different media groups lead to a dominant representation of one of them in the survey.

Despite the survey's drawbacks, with the accumulation of empirical data, assessments, and opinions provided in the responses to the open-ended questions, the series of reports by AEJ-Bulgaria begins to outline long-term trends, processes, and problems of the local media environment.

Politicization of the indices

The media freedom indices and reports trigger serious political debates in the countries they cover, comparisons between countries, and doubts about subjectivity and partiality. They also create a deceptive sense of attempts at discrediting the political establishment. Governments and authoritarian regimes perceive these reports as criticism of the way in which they govern their countries, while opposition groups use them to attack the political status quo.

In 2006, when Germany dropped by five positions in the Reporters Without Borders' index, the opposition described the media environment in the country as 'depersonalized and threatened' and accused the government of doing nothing to avoid the danger and help the media get into a better shape (Schneider, 2020, p. 83).

Three years later, Freedom House's annual report led to protests against the government of prime minister and media mogul Silvio Berlusconi and mobilized a movement fighting for freedom of speech in Italy. The American organization ranked Italy 73rd out of 195 countries and designated the media as 'partly free'[33]. On October 3, 2009, close to 60,000 people took to the streets in Rome to protect the freedom of the media and demonstrate their opposition to the troubling relationships between the government and the media, as well as the attempts to impose political control over journalistic content through regulations. 'There's more freedom of information in Italy than in any other country,' Berlusconi said at the time. He also described the rally as a 'farce'(Mesco, 2009). Reporters Without Borders said the Italian prime minister was an enemy of free media and explained that he was 'on the verge of being added to our list of Predators of Press Freedom.'[34] The debate about the pressure that Berlusconi's government exerted over the media went beyond Italy and reached the European Parliament

whose members discussed a resolution on the protection of pluralism and opposition to media concentration in Europe.

Also in 2009, Reporters Without Borders placed Singapore 144th out of 173 countries in its World Press Freedom Index, putting it in the group of countries with the least free media. Singapore's law minister at the time said the country's press freedom ranking was 'quite absurd and divorced from reality.' [35] When in 2012 Malawi dropped by 67 positions in the same index, the spokesperson of the country's president described the results as 'not realistic,' adding that 'dropping by 67 positions would mean that something catastrophic has happened.' (Schneider, 2020, p. 83). In the same year, New York Times columnist Andrew Rosenthal described the Reporters Without Borders' index as 'a little ridiculous' adding that 'The decision to put the United States in 47th place seems even more silly when you notice that Hungary ranks higher—at 40th' (Rosenthal, 2012).

Reporters Without Borders, which has placed Bulgaria 111th in its index in several consecutive years, showed up in the political debate in the Bulgarian parliament in December 2019 when Vezhdi Rashidov, the chairman of the Culture and Media Committee, accused the organization of 'interfering in people's business' (Андонова, 2019). Rashidov, a Member of Parliament from the GERB party, later said that Reporters Without Borders provided incorrect information about freedom of speech in Bulgaria (Стоянов, 2019).

The French organization's activities are strongly criticized by the media belonging to Member of Parliament and publisher Delyan Peevski. At the same time, the organization's work is hailed, to the point of self-destructive rapture, by publisher Ivo Prokopiev's media: 'Reporters Without Borders deplored the growing political pressure over Dnevnik and Capital,' [36] 'Reporters Without Borders: It's time for the European Parliament to protect Bulgarian journalists,' [37] 'Bulgaria didn't budge from the 111th position for (non)freedom of the media' (Карабоев, 2020).

Delyan Peevski's newspapers Telegraph and Monitor mock Reporters Without Borders, calling them 'Paid Without Borders' [38] and 'Bats Without Borders Against Delyan Peevski and the Country' [39]. In 2018, Monitor wrote the following: 'The NGO, which is registered in France but runs errands globally, again took our country two positions down in its ranking of freedom of speech. Our lower rank is not just without a reason but it is based on the spread of fake news. On the one hand, [this is done] to serve the interests of the behind-the-scenes partners of Reporters Without Borders in the country – the oligarchs and defendants Ivo Prokopiev, Tzvetan Vassilev, and Ognyan Donev, and their friend Sasho Donchev, who are doing everything possible to rock the legitimate institutions in the country to avoid retribution for their crimes. On the other hand, [this is done] so that the NGO itself could take a revenge for the exposing of its behind-the-scenes links to the BG oligarchy and its heralds' [40].

Reporters Without Borders' representatives kept trying to meet Bulgarian Prime Minister Boyko Borissov over a period of three years. At the end of 2019, the organization's secretary-general Christopher Deloire and Pauline Adès-Mével, the head of the organization's EU and Balkans desk, finally met with Borissov [41].

'We discussed the possibilities for our country to improve its position in the press freedom index compiled by Reporters Without Borders. I invited their representatives to participate with proposals for legal changes that should guarantee the independence of the media and people's right to be correctly and precisely informed,' wrote Borissov on social media after the meeting [42]. More than half a year after the long-awaited meeting, the promise for serious legal changes remains unfulfilled.

It is symptomatic that different international organizations, independent of one another, place Bulgaria among the countries with not-free or 'partially free' media, or with serious problems with regards to the media environment, access to information, and the quality of journalism. The withdrawal of large companies from the Bulgarian media market, the acquisition of national media by local businessmen demonstrating close relationships with representatives of the political and judicial branches of power (Милчева, 2019), the removal of prominent figures from TV stations, (Спасов, Св., 2019) the prosecutor's investigation of censorship in the public service radio and the subsequent unscheduled suspension of the radio's director general in relation to this case, [43] the turning of the state into an influential advertiser pouring millions from EU funds (ВЪЛКОВ, 2019), the attempts to adopt legal changes restricting the expression of critical opinions (Андонова, 2020) – all these events clearly indicate the erosion of the Bulgarian media environment. In these conditions, journalism is under huge pressure, and the international press freedom indices only objectify this state of affairs.

Conclusion

The indices measuring media freedom, trust in the media, pluralism, media markets, and the pressure on journalists, among other media issues, are a scientific tool and product that, as can be seen, must meet certain criteria for truthfulness, reliability, and even representativeness – at least when it is possible to ensure representativeness. Oftentimes, the interpretation of the results of an index is limited to the number and the overall rating assigned to a country and a region. This leads to suggestive generalizations – from full coverage and effective public discussion through silence to aggressive criticism and rejection of the conclusions and ratings of the report.

Every international organization uses a methodology that has its positive and negative sides and specializes in the study of a specific topic. Freedom House

treats the problems related to media freedom as one element of their broader study of democratic freedoms. Reporters Without Borders focuses on the professional journalistic community and the cases of journalists facing aggression and pressure. IREX looks at the media environment developments in a country in the context of the broader geographic or political region it finds itself in. The CMPF outlines the risks for media pluralism in the European community. Finally, AEJ-Bulgaria boasts considerable representativeness in relation to the specialized questionnaire it uses to compile its reports but this representativeness is still not enough to paint a complete picture of the problems of the Bulgarian media environment.

All major international organizations use questionnaires and collect data through discussions and deep interviews in small groups, which leads to criticisms as to who and how selects the respondents and raises doubts about the representativeness of their studies. Whereas IREX's and CMPF's country reports contain the names of the participants in the country-level discussions, the reports published by Freedom House and Reporters Without Borders do not disclose this information, partly because they want to guarantee the respondents' safety.

Every media freedom index has a certain territorial scope. The only indices that provide a global view and an opportunity for comparisons between the countries covered by the studies are those published by Freedom House and Reporters Without Borders.

IREX and Freedom House offer a general look at individual regions. Thanks to their long track record and expertise, the two organizations allow for an analysis of long-term trends and changes in the development or decline of a given region or country. The same is true for the CMPF, which specializes in the study of European countries. AEJ-Bulgaria's studies only cover Bulgaria.

In view of their aforementioned particularities, the indices measuring freedom of the media and freedom of speech should be approached critically. Some of the key issues we need to consider in advance so that we can make proper use of the indices include:

- the reputation, experience, and expertise of the organization that has conducted the study;
- the presence/absence of commitments to specific individuals or organizations;
- the sources of funding for the study;
- the scope of the study and the specific political and socio-economic context in which the data was collected;
- the trends emerging from the study;
- the arguments used to support the study's findings and conclusions;
- the validity and reliability of the study's results compared to the results of the studies conducted by other think tanks.

The interpretation of the results of these indices also depends on the individual expertise and professional experience of the people using them. As Petra Berner, the head of strategy and consulting services at DW Akademie, aptly points out, the rankings and reports published by different organizations that monitor the media environment in individual countries and regions are used for different purposes by different people: ‘The results not only receive broad international attention but also have huge consequences in a variety of fields: The scoring of a country fuels the domestic and international political debate, plays an important role for national media policies as well as the implementation of media laws and regulations, and is reflected in the academic discourse,’ Berner explains (Schneider, 2014, p. 5).

What is more, the results of the media freedom rankings can be taken into account when decisions are made about the size of the assistance to be provided or the adoption of additional measures (e.g., financial assistance, legal consultations, lobbying and diplomatic pressure).

In other words, the media freedom reports and rankings are used by academic and university centers, international organizations like the World Bank, analytics and advisory firms such as Gallup, and technological giants like Google and Yahoo. They are also an important instrument for putting pressure on governments and power centers that suppress free speech and repress journalists and critical media. At the same time, they serve as arguments in support of calls for the adoption of liberal legal measures and the reduction of overregulation, and as guarantees for the existence of viable media pluralism. Finally, these reports and rankings can be used as guidebooks by government and nongovernment donor organizations supporting the development of the media environments in countries in ‘democratic decline.’

Notes

- [1] Media Freedom and Pluralism. 03.2020 <https://ec.europa.eu/digital-single-market/en/policies/media-freedom-and-pluralism> Last seen: 17.06.2020
- [2] Charter Of Fundamental Rights Of The European Union. 2010 <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2010:083:0389:0403:en:PDF>. Last seen: 17.06.2020
- [3] Freedom House. About us. <https://freedomhouse.org/about-us> Last seen: 22.07.2020
Freedom House. Our History. <https://freedomhouse.org/about-us/our-history> Last seen: 22.07.2020
- [4] Ibid.
- [5] Freedom House. Financial Statement. June 2016. p. 21 https://freedomhouse.org/sites/default/files/FINAL_Basic_Financial_Statements_2016.pdf Last seen: 22.07.2020
- [6] As is said in the Methodology of Freedom House: "Prior to the 2020 edition, Freedom in the World assigned a country or territory two ratings—one for political rights and

- one for civil liberties—based on its total scores for the political rights and civil liberties questions. Each rating of 1 to 7, with 1 representing the greatest degree of freedom and 7 the smallest degree of freedom, corresponded to a specific range of total scores. The average of the ratings determined the status of Free, Partly Free, or Not Free. While the underlying formula for converting scores into status remains identical, starting in the 2020 edition Freedom in the World no longer presented the 1 – 7 ratings as a separate element of its findings. The ratings are still included in the raw data available for download." See more at: Freedom House. Freedom in the World Research Methodology. <https://freedomhouse.org/reports/freedom-world/freedom-world-research-methodology> Last seen: 20.07.2020
- [7] Reporters without borders. Our values. <https://rsf.org/en/our-values> Last seen: 22.07.2020
- [8] Reporters without borders. Financial transparency. <https://rsf.org/en/financial-transparency> Last seen: 22.07.2020
- [9] IREX. Our History. <https://www.irex.org/our-history> Last seen 22.07.2020
- [10] IREX. Financial information. <https://www.irex.org/financials> Last seen 22.07.2020
- [11] IREX. Our History. <https://www.irex.org/our-history> Last seen 22.07.2020
- [12] Centre for Media Pluralism and Media Freedom (CMPF). About. <https://cmpf.eu.eu/about/> Last seen 22.07.2020
- [13] CMPF. Factsheet. https://cmpf.eu.eu/wp-content/uploads/2020/01/factsheet-CMPF_2020_web.pdf Last seen: 22.07.2020
- [14] More information about AEJ: www.aej.org. Last seen: 22.07.2020
- [15] AEJ-Bulgaria. Mission and history. <https://new.aej-bulgaria.org/mission/> Last seen: 22.07.2020
- [16] AEJ-Bulgaria. About us. <https://new.aej-bulgaria.org/en/about-aej-bulgaria/> Last seen: 22.07.2020
- [17] AEJ-Bulgaria. Projects. <https://new.aej-bulgaria.org/category/aej-projects/> Last seen:
- [18] The author of this article has served as a rapporteur in the last three surveys: Valkov, Iliya. AEJ-Bulgaria. New Forms of Pressure: Rumours and Defamation Against Journalists. (2015 Annual Study on Freedom of Speech in Bulgaria) <http://new.aej-bulgaria.org/wp-content/uploads/2020/04/anketa-resultati-2015.pdf> Last seen: 22.07.2020
- Valkov, Iliya. AEJ-Bulgaria. The Big Comeback of Political Pressure. (2017 Annual Study of Freedom of Speech in Bulgaria). <http://new.aej-bulgaria.org/wp-content/uploads/2020/04/golyamoto-zavrashtane.pdf> Last seen: 22.07.2020
- The results of the 2020 study are yet to be published
- [19] Freedom House. Freedom in the World 2019 Methodology. https://freedomhouse.org/sites/default/files/2020-02/Methodology_FIW_2019_for_website.pdf Last seen: 23.07.2020
- [20] RSF. Detailed methodology. <https://rsf.org/en/detailed-methodology> Last seen: 23.07.2020
- [21] Ibid.
- [22] Ibid.
- [23] RSF calls for protection for murdered Bulgarian journalist's colleagues. 08.10.2018. <https://rsf.org/en/news/rsf-calls-protection-murdered-bulgarian-journalists-colleagues> Last seen: 23.07.2020

- [24] Media Sustainability Index. 2016 <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2016-cover.pdf.pdf> Last seen: 23.07.2020
- [25] Media Sustainability Index. 2016 <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2016-cover.pdf.pdf> Last seen: 23.07.2020
- [26] The author has served as a panelist in two IREX studies in Bulgaria.
- [27] Media Sustainability Index. 2016 <https://www.irex.org/sites/default/files/pdf/media-sustainability-index-europe-eurasia-2016-cover.pdf.pdf> Last seen: 23.07.2020
- [28] IREX. Europe & Eurasia. <https://www.irex.org/region/europe-eurasia> Last seen: 23.07.2020
- [29] MediaPluralismMonitor. Questionnaires. 2017 <https://cmpf.eui.eu/wp-content/uploads/2018/12/questionnaire-MPM2017-for-publication.pdf>. MediaPluralismMonitor. Monitoring Media Pluralism in the Digital Era. 2020 https://cadmus.eui.eu/bitstream/handle/1814/67828/MPM_2020-PolicyReport.pdf?sequence=1&isAllowed=y Last seen: 24.07.2020
- [30] Orlin Spassov's comments are drawn from an interview that the author of this article conducted with him by email.
- [31] Ibid.
- [32] Ibid.
- [33] Дойче веле. На бунт срещу медийния магнат Берлускони. 03.10.2009. <https://www.dw.com/bg/%D0%BD%D0%B0-%D0%B1%D1%83%D0%BD%D1%82-%D1%81%D1%80%D0%B5%D1%89%D1%83-%D0%BC%D0%B5%D0%B4%D0%B8%D0%B9%D0%BD%D0%B8%D1%8F-%D0%BC%D0%B0%D0%B3%D0%BD%D0%B0%D1%82-%D0%B1%D0%B5%D1%80%D0%BB%D1%83%D1%81%D0%BA%D0%BE%D0%BD%D0%B8/a-4754605> Last seen: 20.07.2020
- [34] Reporters Without Borders in Rome as Berlusconi gets closer to being declared a "Predator". 02.10.2009. <https://rsf.org/en/news/reporters-without-borders-rome-berlusconi-gets-closer-being-declared-predator> Last seen: 20.07.2020.
- [35] AsiaOne. Low ranking for press freedom here absurd: Shanmugam. Oct 27, 2009. <https://www.asiaone.com/print/News/AsiaOne%2BNews/Singapore/Story/A1Story20091027-176233.html> Last seen: 20.07.2020.
- [36] Дневник. "Репортери без граници" осъди растящия политически натиск срещу "Дневник" и "Капитал". 22.05.2020. https://www.dnevnik.bg/bulgaria/2020/05/22/4070426_reporteri_bez_granici_osudi_rastiashtia_politicheski/ Last seen: 22.07.2020
- [37] Дневник. "Репортери без граници": Време е Европарламентът да защити българските журналисти. 14.02.2020. https://www.dnevnik.bg/sviat/2020/02/14/4029543_reporteri_bez_granici_vreme_e_evroparlamentut_da/ Last seen: 19.07.2020
- [38] Монитор. "Репортери без граници" доказаха, че са "Платени без граници". 25.04.2018 <https://www.monitor.bg/bg/a/view/26424-%D0%A0%D0%B5%D0%BF%D0%BE%D1%80%D1%82%D0%B5%D1%80%D0%B8-%D0%B1%D0%B5%D0%B7-%D0%B3%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B8-%D0%B4%D0%BE%D0%BA%D0%B0%D0%B7%D0%B0%D1%85%D0%B0-%D1%87%D0%B5-%D1%81%D0%B0-%D0%9F%D0%BB%D0%B0%D1%82%D0%B5%D0%BD%D0%B8-%D0%B1%D0%B5%D0%B7->

- %D0%B3%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B8 Last seen: 22.07.2020
- [39] Монитор. Бухалки без граници срещу Делян Пеевски и страната (ОБЗОР). 21.04.2020 <https://www.monitor.bg/bg/a/view/buhalki-bez-granici-sreshtu-deljan-peevski-i-stranata-obzor-197768> Last seen: 25.07.2020.
- [40] Монитор. "Репортери без граници" доказаха, че са "Плагени без граници". 25.04.2018 <https://www.monitor.bg/bg/a/view/26424-%D0%A0%D0%B5%D0%BF%D0%BE%D1%80%D1%82%D0%B5%D1%80%D0%B8-%D0%B1%D0%B5%D0%B7-%D0%B3%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B8-%D0%B4%D0%BE%D0%BA%D0%B0%D0%B7%D0%B0%D1%85%D0%B0-%D1%87%D0%B5-%D1%81%D0%B0-%D0%9F%D0%BB%D0%B0%D1%82%D0%B5%D0%BD%D0%B8-%D0%B1%D0%B5%D0%B7-%D0%B3%D1%80%D0%B0%D0%BD%D0%B8%D1%86%D0%B8> Last seen: 22.07.2020
- [41] This meeting came a month and a half after Reporters Without Borders' representatives met with Bulgarian President Rumen Radev.
- [42] Клуб Z. След три години чакане Борисов прие "Репортери без граници" <https://clubz.bg/91281-sled-tri-godini-chakane-borisov-prie-reporteri-bez-granici> Last seen 22.07.2020
- [43] Клуб Z. СЕМ ще сезира прокуратурата за цензура в БНР. 19.09.2019 <https://clubz.bg/88051-sem-shte-sezira-prokuraturata-za-cenzura-v-bnr> Last seen: 17.07.2020

References

Андонова, З. (2020). Дневник. Нов закон срещу фалшивите новини: ВМРО иска спиране на профили в социалните мрежи заради дезинформация. 28.05. 2020. (Andonova, Z. Dnevnik. Nov zakon sreshtu falshivite novini: VMRO iska spirane na profile v socialnite mreji zaradi dezinformaciata) https://www.dnevnik.bg/politika/2020/05/28/4072469_nov_zakon_sreshtu_falshivite_novini_vmro_iska_spirane/ Last seen: 17.07.2020

Андонова, Здр. (2019), Дневник. Парламентът задължи правителството да приеме план за развитието на медийната среда. 12.06.2019 (Andonova, Zdr. Dnevnik. Parlamentat zadalji pravitelstvoto da prieme plan za razvitiето na mediinata sreda) https://www.dnevnik.bg/politika/2019/12/06/4001942_parlamentut_zadulji_pravitelstvoto_da_prieme_plan_za/ Last seen: 20.07.2020

Вълков, И. (2017), Голямото завръщане на политическия натиск. 2017 г. – годишно изследване за свободата на словото в България. София: АЕЖ-България (Valkov, Iliya. Goliamoto zavrashthane na politischeskia natisk. 2017 – godishno izlsedvane za svobodata na slovoto v Balgaria. Sofia: AEJ-Balgaria) <http://new.aej-bulgaria.org/wp-content/uploads/2020/04/golyamoto-zavrashthane.pdf> Last seen: 24.07.2020

Вълков, И. (2019), Клуб Z. Кои медији колко са получили од еврофондовите (ПЪЛЕН СПИСЪК). 10.07.2019 (Valkov, Iliya. ClubZ. Koi medii kolko sa poluchili ot evrofondovete (Palen Spisak) https://clubz.bg/85164-koi_medii_kolko_sa_poluchili_ot_evrofondovete_pylen_spisyk Last seen: 17.07.2020

Карабоев, П. (2020), Дневник. България не помръдна од 111-о място по (не)свобода на медиите. 21.04.2020 (Karaboev, P. Dnevnik. Bylgaria ne pomrydna ot 111-to miasto po (ne)svoboda na mediate) https://www.dnevnik.bg/sviat/2020/04/21/4056892_bulgariia_ne_pomrudna_ot_111-o_miasto_po_svoboda_na/ Last seen: 25.07.2020

Милчева, Е. (2019), Дојче веле. Домусчиев купи NOVA: неколку факта, коишто не бива да пропускаме. 22.02.2019 (Milcheva, Emilia. Doiche vele. Domuschiev kupi Nova: nyqkolko fakta, koito ne biva da propuskame) <https://www.dw.com/bg/%D0%B4%D0%BE%D0%BC%D1%83%D1%81%D1%87%D0%B8%D0%B5%D0%B2-%D0%BA%D1%83%D0%BF%D0%B8-nova-%D0%BD%D1%8F%D0%BA%D0%BE%D0%BB%D0%BA%D0%BE-%D1%84%D0%B0%D0%BA%D1%82%D0%B0-%D0%BA%D0%BE%D0%B8%D1%82%D0%BE-%D0%BD%D0%B5-%D0%B1%D0%B8%D0%B2%D0%B0-%D0%B4%D0%B0-%D0%BF%D1%80%D0%BE%D0%BF%D1%83%D1%81%D0%BA%D0%B0%D0%BC%D0%B5/a-47626821> Last seen: 17.07.2020

Симеонова, Е. (2019), Свободна Европа. Репортери без граници: България отново 111-а, заради корупција и липса на правосъдие. (Simeonova, Elitsa. Svobodna Evropa. Reporteri bez granitsi: Balgaria otново 111-a zaradi korupcia I lipsa na pravosadie) 17.04.2019. <https://www.svobodnaevropa.bg/a/29886867.html> Last seen: 23.07.2020

Спасов, О., Огњанова, Н., Даскалова, Н. (2017), Мониторинг на медијниот плурализам 2017. Набљудение на ризиците за медијниот плурализам во ЕС, Македонија, Србија и Турција. Национален доклад: България. (Spasov, O., Ognianova, N., Daskalova, N. Monitoring na mediinina pluralism 2017. Nabludenie na riskovete za mediinina pluralism v ES, Makedonia, Sarbia I turcia. Nacionalen doklad: Balgaria. 2017) http://www.fmd.bg/wp-content/uploads/2018/12/mpm2017_narrative_report_bulgaria_bg.pdf Last seen: 23.07.2020

Спасов, О., Огњанова, Н., Даскалова, Н. (2016), Мониторинг на медијниот плурализам 2016. Набљудение на ризиците за медијниот плурализам во ЕС (плус Турција и Черна гора). Национален доклад: България. 2016. (Spasov, O., Ognianova, N., Daskalova, N. Montoring na mediinina pliralizam 2016. Nabludenie na riskovete za mediiniq pluralizam v ES (plus Turcia I Cherna gora). Nacionalen doklad: Balgaria) <https://cadmus.eui.eu/bitstream/>

handle/1814/46789/Cover_Bulgaria_O.pdf?sequence=2&isAllowed=y Last seen: 24.07.2020

Спасов, С. (2020), Сегга. Нова телевизия уволни Миролуба Бенатова и Генка Шикерова. (Spasov, S. Segga. Nova televizia uvolni Miroluba Benatova i Genka Shikerova) 13.06.2019. <https://www.segabg.com/node/74638> Last seen: 17.07.2020

Стоянов, М. (2019), Дневник. Според Рашидов "Репортери без граници" дават грешна информация за свободата на словото в България. 09.12.2019 (Stoianov, M. Dnevnik. Spored Rashidov "Reporteri bez granitsi" davat greshna informaciq za swobodata na slovoto v Balgaria) https://www.dnevnik.bg/bulgaria/2019/12/09/4002853_spored_rashidov_reporteri_bez_granici_davat_greshna/ Last seen: 20.07.2020

Rosenthal, A. (2012), New York Times. USA, USA, We're No. 47. 26.01.2012 <https://takingnote.blogs.nytimes.com/2012/01/26/usa-usa-were-no-47/> Last seen 20.07.2020

Casper, G., Tufis, C. (2003), Correlation versus Interchangeability: The Limited Robustness of Empirical Findings on Democracy using Highly Correlated Datasets. Last seen: 22.07.2020

Mesco, M. (2009), The Guardian. Italy's press freedom in peril. 10.10.2009 <https://www.theguardian.com/commentisfree/libertycentral/2009/oct/10/italy-press-freedom-berlusconi> Last seen: 20.07.2020.

Schneider, L. (2020), Measuring Global Media Freedom. Springer, Berlin.

Schneider, L. (2014), DW Akademie. Media Freedom Indices What They Tell Us – And What They Don't.