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You must at all times be focused on the viewers, and never forget that they are there. [...] They must feel that you are interested in how they are doing, that you care. Then they are responding. If you just sit there and discuss something, they may still be watching, but it will not be very interesting for them to get involved (Norwegian SMS-TV host, 2004).

1 Introduction

The transition from analogue to digital television, and the parallel convergence between networks, markets, and services, has everywhere provoked predictions of fundamental changes in the media. These include apocalyptic visions of the end of mass-market television, advertising, and traditional industry practices, and utopian visions of “passive” audience members transformed into hyper-rational “active” producers. Based on historical experiences it is easy to be sceptical about predictions for technology-driven fundamental change – clearly the potential of new media to radically transform industry and audience behaviour has been oversold in the past. Nevertheless, after half a decade into the Twenty-first century there is manifest turmoil in the television business. Something is happening with digital and interactive television that is leading to shifts within the industry.

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1 Therese Fjellgård, host on Mess-TV on TVNorge, interviewed by Alex Eidsæther, 2004.
In media research, these developments have been analysed from different perspectives. Following Beyer et al. (forthcoming), three broad strands of research can be identified. One focuses on the political economy of digital television and the special case of digital terrestrial networks (Steemers 1998; Levy 1998; Papatheo 2002; Lowe/Hujanen 2003; Brown/Picard 2005). A second focuses on broadcasting’s move towards a coordinated Internet presence, including web-based television (Columbo 2004; Siapera 2004; Roth 2001; Mournier/Drumare 2001; Steemers 1999). A third strand focuses on new programming, experiments with “interactive” add-ons, and new forms of user behaviour (Enli 2005; Beyer et al. forthcoming; Jones 2003, 2004; Christensen 2002).

This article focuses on the third aspect with a view to the first and second. The aim is to investigate the strategies behind and the responses toward the development of multi-platform media hybrids – a term used here to describe the tendency to combine traditional television with other media in order to stimulate viewer activity. Multi-platform media hybrids have developed rapidly over the last five years (Columbo 2004). A familiar pioneer is the Big Brother format that seems to draw on almost all existing media – terrestrial broadcasting, digital broadcasting (pay-TV), Internet, mobile phone, land-line phone, audio, video/book retail, and tabloid press – to create an integrated event (Jones 2003: 419). Pop Idol is another successful global format that lends itself to a variety of applications. In addition, there are a multitude of smaller-scale, experimental, and local formats that combine several platforms to encourage input from users.

Multi-platform media hybrids and similar phenomena are generally classified according to the degree of user influence on the finished product (van Dijk/de Vos 2001: 452; Beyer et al. forthcoming; Corcoran 2004: 21). Taking the traditional television programme as the starting point, three broad categories can be identified:

- **Reactive – low degree of influence**: Users respond to questions (quiz), calls for opinions (shout), or invitations to vote on various issues (poll). Inputs from users have no major influence on the course of events. Examples include polls in dis-

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2 Richeri (2004) traces the history of interactive TV in Europe, Boddy (2004) in the US. Both show that the potential of interactive TV has been oversold; there have been many experiments, few of them successful.

3 To some degree these developments came as a surprise: The green papers and consultation documents on “convergence” and “digitalisation” that were published in the mid- and late-1990s did not foresee the degree to which traditional media and SMS/mobile phone would be used to create simple forms of “interactivity”. See British Department of Trade and Industry (1998); SOU 1999:55; NOU 1999:26; COM (1997) 623 final.
cussion formats, various forms of quizzes, and questions in news and sport programmes.

- **Reactive – higher degree of influence:** Users respond to invitations to vote (*poll*) or calls for opinions (*shout*). Users have accumulated power over the turn of events, determining, for example, which contestants should remain and which should disappear in an entertainment/reality show. Examples include *Big brother*, *Pop Idol*, and music video shows (“jukebox formats”).

- **Interactive⁴ – highest degree of influence:** Extended discussions where input from users determine most of the content. Later messages refer to earlier messages in the chain, or are responses to prompts from hosts/moderators. Examples include chat-TV, blog-TV, and SMS-TV.

In this article I examine industry strategies towards multi-platform media hybrids and explain how the development of such hybrids fits with dominant political-economic trends in the business. After explaining the reasons why industry promotes interactivity, I turn to the regulatory response to multi-platform hybrids. A key problem for regulators is to classify the various forms of user feedback in programmes and place them in the right category: should these forms be encouraged as a new form of democratic discourse, or should they be treated primarily as a form of self-promotion and brand-building activity for existing TV corporations and be regulated as such?

The article draws on evidence from Norwegian television.⁵ One aim is to identify strategic differences between TV corporations. I distinguish between:

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⁴ The term “interactive” is contested (Jensen 1998; Aarseth 1997). Its vague but positive connotations make it similar to terms such as “convergence” and “public service broadcasting”, all of which are used extensively in media policy debates (Prebensen 2005; Syvertsen 1999). In this article, “interactive” is used descriptively to indicate certain types of multi-platform hybrids, as well as more generally to indicate input from users.

⁵ The article is based partly on empirical evidence gathered by the research group Participation and play in converging media (PaP). PaP is based at the Department of Media and Communication at the University of Oslo, and focuses, among other things, on how regulatory frameworks, industry structure, and policies frame the production and use of multi-platform media hybrids. See project outline at: http://www.media.uio.no/prosjekter/pap/index.php. The group is funded by the Norwegian Research Council (NFR). The empirical evidence consists partly of interviews carried out by a group of M.A. students affiliated with PaP, and partly of information from institutional and political documents. I am indebted to the M.A. students and to research assistant Vilde Schanke Sundet, who has helped to gather and select material for the study. Interviews are
• Publicly-owned and licence fee-funded public service channels, in this case the Norwegian broadcasting corporation NRK. In Norway, NRK is leading in terms of audience popularity, with a market share in 2004 of 44%.

• Mass market advertising-funded channels, in this case the Norwegian channel TV 2. TV 2 belongs to large media conglomerates, and is second in terms of market share (30% in 2004). TV 2 has a set of public service obligations, but is regulated less strictly than NRK.

• Niche commercial channels, in this case the Norwegian channel TVNorge. TVNorge is privately-owned, without public service obligations, and with very little content production of its own. Its market share in 2004 was 10%.

Key questions are: What are the main trends pointing towards interactivity in television? How do different broadcasters approach the issue of multi-platform media hybrids? What are the issues and conflicts involved in the regulation of such hybrids?

2 Why do it?

The development of multi-platform formats is difficult for broadcasters, who are unsure of business models, design, technical solutions, and user demand. The development of such hybrids nevertheless fits well with important industry trends. Below I will identify four trends that point towards the development of multi-platform hybrids: turning viewers into customers; exploiting off-broadcast time; building brand loyalty; and exploiting cross-media investments.

2.1 Turning viewers into customers

The first reason for the experimentation with multi-platform media hybrids is financial. Both licence fee-funded and commercial channels are worried that traditional sources of revenue are endangered due to the introduction of personal video recorders and the multiplication of outlets. Since the mid-1990s television companies have eagerly sought to find new revenue sources involving more direct sales of goods and

available (in Norwegian) at the PaP website: http://www.media.uio.no/prosjekter/pap/forskning.html.

6 The figure covers both NRK1 (41%) and NRK2 (3%). Market shares are available at: http://medienorge.uib.no/
services. To some degree, multi-platform media hybrids are seen as a partial solution to the problem of how to find new forms of revenue.

The first choice of strategy for many companies searching for new revenue streams has been to sell programming and services to other operators, i.e., to commercialise various elements of the content (news, weather, etc.). Companies both in the public and commercial sector established subsidiaries to take care of such operations in the 1990s. The subsidiaries were slow to make a profit, but were seen as necessary investments for the future. Toward the end of the 1990s more emphasis was placed on combining various platforms in an effort to create “interactive market- and meeting places”. In Norway, the business area “Interaktivum” was added to the commercial arm of the public broadcaster NRK in 1998. The same year, commercial public broadcaster TV 2 described the activities of its new subsidiary Net 2 as such:

Net 2’s activities take the synergy between TV 2 and the Internet as their starting point, and focus especially on the commercial development of interactive marketplaces and services based on teletext, Internet, land-lines, and mobile phones (TV 2 Årsrapport 1998: 25).

TV 2’s service was not just a marketplace; in connection with the service an experimental meeting-place was also set up. The service SMS-chat used teletext, the Internet, and mobile phones in order to create a chat format on TV 2’s teletext pages. The service was a surprising success, soon reaching 30,000 hits a day (TV 2 Årsrapport 1998: 25).

The collapse of the “dot.com boom” by the end of 2000 led to major restructuring in the business. To the surprise of many of those involved, some of the simpler interactive solutions were nevertheless beginning to make a profit. “Surveys of some of the large TV markets in Europe reveal that “interactive TV” has developed in a rather surprising fashion – using the mobile phone as a return channel”, TV 2 reported in 2001 (TV 2 Årsrapport 2002: 15). From then on, records for SMS services were beaten every year. In 2003, 3.3 million votes were cast during the first season of Pop Idol in Norway, rising to more than 6 million votes in 2004 and 2005 (out of a total population of 4.5 million).

Thus, we see the first signs of profits in what is termed the “return path economy” where revenue is collected by convincing audiences to respond to a variety of

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7 In Norway, the commercial public broadcaster TV 2 established a series of subsidiaries from the mid-1990s onwards. In 1997 NRK Aktivum was established to take care of commercial operations for the public broadcaster.
stimuli, and where “[e]very phone call made, text message sent and television remote control vote cast, nets the producer a small income” (Jones 2004: 212).

The phrase “turning viewers into customers” was coined by TV 2 in the year 2000 to describe the development of “interactive” market- and meeting places (TV 2 Årsrapport 2000: 43). The aim was to establish a direct link with viewers in order to secure profits that would otherwise go to telecommunication actors or other operators in the value chain (TV 2 Årsrapport 2001: 26). Establishing a direct link with audiences rather than selling them as accumulated numbers to advertisers was seen as the key to future profits and also the main benefit of digitalisation. Another benefit of the return path economy was better identification of viewers: “We want to turn our viewers into customers. Then we need to know who they are, so that we can communicate more directly with them”, stated TV 2’s Chief Editor in 2002.8

In Norway, the mass-market commercial channel TV 2 has been the main champion of turning viewers into customers. TV 2’s strategies are different from those of niche commercial channel TVNorge and public broadcaster NRK. TVNorge’s strategy is blatantly commercial, but the channel has much less content production and less to win from large-scale commercialising of services. NRK has immense content production, but is not allowed to have advertising on its regular services, and is thus less interested in developing interactive marketplaces.

Nevertheless, NRK makes no secret of its intention to earn money from interactive solutions in the long run (Enli 2005: 122). Income from commercial activities has increased since the late 1990s, when NRK was allowed advertising on its teletext and Internet services. No specific figures are available for NRK’s income from multi-platform media hybrids, but an example may be illustrative. In July 2003, NRK became the first European TV channel to invite viewers to submit MMS messages for on-screen display, and as many as 2,000 MMS messages were shown on the first weekend. Each message cost 15 Norwegian kroner (approximately € 2).9 Although telecom operators take a substantial share, it is clear that multi-platform media hybrids may be one line of attack for public broadcasters keen to supplement their income.

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2.2 Exploiting off-broadcast time

The second reason why corporations develop multi-platform media hybrids is that this is an inexpensive way to fill off-broadcast time – the hours of the day when the number of viewers is too low to make regular programming viable. Cost is a key factor in the television industry: programming decisions are made just as much with regard to saving on costs as on generating income. Two key points can be made here in regard to Norwegian television. First, in a small market there is more off-broadcast time than in larger markets – since television works according to economies of scale, a small population is highly disadvantageous for TV companies. Secondly, it is to be expected that the TV channels with the smallest market shares will have the most to win from using multi-platform media hybrids to fill their off-broadcast time.

The first point helps to explain why TV channels in the smaller European countries have been pioneers with regard to off-broadcast SMS formats: formats that run for hours and are based mainly on input from users. In countries with small populations and extensive use of mobile phones, such as Norway, this makes good financial sense. Off-broadcast time on Norwegian TV has over the last years become a space for trying out new services – what was earlier empty space or the cheapest available imported repeats have become key areas for multi-platform add-ons. As Enli (2005: 120) argues, low availability of viewers creates a situation where “it may be financially preferable to base income on direct payment from audiences rather than trying to sell audiences to advertisers”.

The second point helps explain why the smaller channels are the most active. In Norway, the niche commercial channel TVNorge, with 10% market share, is an SMS-TV pioneer: its show Mess-TV takes up to 9 hours every day, and more than 6,000 hours have been produced since 2002 (Sivertsen 2005: 92; see also Enli 2005; Beyer et al. forthcoming). Using the off-broadcast hours for SMS-TV also makes good political sense for TVNorge: the company had trouble meeting the requirement of 50% European programming and was looking for something “very cheap to produce which preferably would give some income” (Enli 2005: 120).

Another pioneer in the Norwegian context is NRK2, the second NRK channel which only began broadcasting in 1996, and which only holds a 3% market share (2004). The SMS-show Svisj began in 2002 as a music video/chat show transmitted outside ordinary broadcast time on NRK2, and is now taking up one third of NRK2

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10 In 2004, 91% of the Norwegian population owned a mobile phone, and penetration among 16-24 year-olds was as high as 99% (Beyer et al forthcoming).
time (Beyer et al. forthcoming). Several other similar formats have been broadcast on NRK2.\textsuperscript{11} The reason is not only that this is cheaper than ordinary programming – NRK2 is also acknowledged as an experimental space with fewer limitations than the mainstream channels (Enli 2005: 122). In the new media situation, broadcasters need experimental spaces where they can try out interactive solutions, test new business models, “teach viewers interactivity”, and prepare producers and journalists for the things to come.

### 2.3 Building brand loyalty

The third reason why corporations are instating multi-platform add-ons is the need to build brand loyalty, particularly among young viewers who are considered fickle and difficult to capture. Interactive television is seen as “an excellent way to woo an increasingly ‘promiscuous’ audience” (Jones 2003: 419). Again, this is a motive which pertains to both commercial and licence fee-funded television corporations. “I am convinced that interactivity creates loyalty to TV programmes”, states the Director of TV 2’s interactive operations.\textsuperscript{12} An NRK representative explains how the theory works: “The thesis is that if you get an opportunity to influence, you feel more ownership of the product and this increases your loyalty. And then you may choose NRK all the time.”\textsuperscript{13}

In order to win young viewers, the TV corporations have mimicked contemporary patterns of media use, especially among 15-30 year-olds (Jones 2004: 211; see also Christensen 2002: 6). The mobile phone, in particular, plays a pivotal role in today’s youth culture. “With the mobile phone teenagers can position themselves in relation to a number of time-typical trends: being easily accessible, flexible, communicative, informed and up to date”, writes Skog (2002: 270), and emphasises how the mobile phone “symbolises a lifestyle and the dynamic youth ideal in modernity”. Generally, TV programmes for young people have picked up on new media as they have been accommodated into youth culture. TV 2’s youth programme, Sone 2, has gradually upgraded its feedback possibilities from phone and fax to e-mail, and later

\textsuperscript{11} NRK 2002a: 36-39. NRK 2 shows in 2005 include Svisj, Autofil Jukeboks, Nattønske.

\textsuperscript{12} Gunnar Stavrum, Director and Chief Editor of TV 2 Interaktiv/TV 2 Nettavisen, interviewed by Hans Martin Cramer, 2003.

to SMS,\textsuperscript{14} whereas feedback to NRK’s children and youth formats has graduated from letter-writing to SMS. The SMS-TV shows \textit{Svisj} (NRK2) and \textit{Mess-TV} (TVNorge) have both been instrumental in attracting youth viewers to the two smaller TV channels.

Brand-building is not only about younger viewers, however. A whole array of measures is used to increase loyalty and stimulate viewer activity. “Clan-building”, where registered users receive news alerts, useful hints, or newsletters is a common way to enhance loyalty and provide audiences with a possibility to influence the narrative.\textsuperscript{15} The possibility to pose questions to guests and hosts in live programming or to participate in polls via phone, e-mail, or SMS has a similar community-building function. The same holds for inviting viewers to ask questions or offer comments to guests after the regular broadcast is over.

Branding strategies are similar across channels. But branding is not so much about similarities as differences; each company aims to establish a distinct brand that can provide its products with a competitive edge. TV 2 has been a brand-building pioneer in the Norwegian context; from the beginning in 1992 it has systematically branded itself as an open and inclusive channel that valued input from the public (Østby Sæther 2002; Enli 2002). Interactive solutions fit well with this branding project, and beginning in 2001 TV 2 has brought SMS feedback into current affairs programmes on a regular basis.\textsuperscript{16} In 2005 TV 2 began using polls, questions, and comments in all its news and current affairs programmes. Apart from that, it concentrates its efforts on large-scale family-oriented formats such as \textit{Pop Idol}. The latter is a huge hit in terms of bringing in revenue through SMS and land-line telephone-voting.

Licence fee-funded public broadcasters are expected to produce more innovative programmes than commercial broadcasters, and public broadcasters are using interactivity to brand themselves as innovative and forward-looking: “NRK shall be innovative in both content and form. That’s why we launch programmes where in-

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\textsuperscript{14} Sone 2 is transmitted daily and simultaneously on the Internet and TV. It is one of the most visited youth portals in Norway (TV 2 Allmennkringkastingsregnskap 2001: 10; see also Status 2, 2000:3, p. 15).

\textsuperscript{15} Examples involve user communities such as “mPetre-klanen” with more than 90,000 registered users (NRK 2003: 50). NRK has experimented with news and sport alerts via SMS, and one can subscribe to newsletters from many programmes (NRK 2002a: 36-39).

\textsuperscript{16} TV 2 introduced SMS services in its current affairs programme \textit{Tabloid} in 2001. Usually about 2,000 messages are received (Enli 2002: 95), but the number has at times exceeded 5,000 (Status 2, 2004:2, p. 11).
teractivity is an integrated element, and not just a service (for example SMS) added afterwards” (NRK 2001: 31).

NRK launched its first “interactive” quiz programme in 2001\(^\text{17}\) and since 2002 experiments have proliferated. Most new factual and entertainment formats include some form of audience response.\(^\text{18}\) In addition, NRK has engineered spectacular experiments, of which *Forfall* (Decay) has been the most famous/infamous.\(^\text{19}\) A well-known performance artist and broadcaster, Kristopher Schau, was locked up in a shop window on Oslo’s main street for a week in 2001 to investigate how fast it was possible to “decay”. Schau lived on a diet of junk food, toxic substances, and low-brow culture, having his vital signs monitored at critical junctures. Viewers could observe the “medical experiment” around the clock, live or through radio and television shows, Internet streaming, or a mobile WAP portal. Users could influence events through, for example, *Dilemma of the Day*, which included questions such as whether Schau should eat his own warts (votes were in favour of this, and a wart was subsequently surgically removed and eaten).

While pioneering some of the titillating features later to be found on other reality shows and in physical-political experiments, such as the U.S. film *Super Size Me* (2004, Morgan Spurlock), NRK’s experiment nevertheless distanced itself by showing awareness of the high-low cultural divide. *Forfall* was embraced as a reality parody bordering on an avant-garde experiment. In general, NRK has been adamant in showing that its interactive programmes are different than those on commercial channels. NRK argues, for example, that its SMS show promotes more Norwegian bands than competing shows (NRK 2002a: 36-39), and stresses that it provides an open space where bands that do not yet have a record deal may post demos (NRK 2003: 50). NRK executives claim that interactivity to them is less about branding and more about building democracy: “encouraging a lot more people to express themselves in the public sphere than just experts or the particularly eloquent”\(^\text{20}\) (see also Enli 2005: 122; Beyer et al. forthcoming).

In Norway, the niche commercial channel TVNorge has also embraced innovation as a core value, but does this in a more speculative and titillating way than the

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\(^{17}\) The early quiz shows *Verdensmester* and *Pokorfjes* used the remote control for feedback (only Canal Digital’s digital subscribers) (NRK 2001: 31).

\(^{18}\) NRK’s goal is to launch at least 15 new formats every year and to “integrate multi-platform solutions and interactivity into the new programmes” (NRK 2002b).

\(^{19}\) NRK’s youth portal on the Internet had more than 2 million hits during the week of *Forfall* (NRK 2001: 31).

\(^{20}\) Oddvar Bull Tuhus, Editor of Interactive services in NRK, interviewed by Alex Eidsæther, 2004.
larger TV companies. TVNorge showed *Big Brother*, and the techniques used in its SMS show (*Mess-TV*) are often deliberatively provocative. One of the producers provides an example:

“We had an enormous amount of messages after one of the hosts said […] that many women nursed their babies in public because they wanted to show their breasts. … This was meant as a joke, but generated an incredible amount of messages. Viewers became really infuriated. … In the end it became too much – the TV company’s switchboard overflowed with telephone calls.”

As Norway’s third largest channel, TVNorge sees gaining attention as necessary (Enli 2005: 121). “We want to be in the forefront and take risks”, a spokesman for TVNorge says: “Many times we are strongly criticised for what we do, but we cannot stop progress”. Often, however, TVNorge’s strategies are more about repeating what has already been done, than about being in the forefront. As this quote from a producer shows:

“It seems that viewers like to have power over the hosts. […] We made a “Kristopher Schau”-inspired dish and viewers were asked to vote over who should eat it. This was very popular. It was also very childish, but that was the intention.”

This represents a spin-off of the NRK experiment *Forfall* (above), but without the genre-reflexivity or innovative edge of the original experiment.

### 2.4 Exploiting cross-media investments

The fourth reason why corporations are building multi-platform media hybrids is the need to exploit big formats and cross-media investments more effectively. Large formats are expensive and represent considerable investments for TV companies, but if they are successful they are likely to be exploited by other media such as the tabloid press. For TV companies the obvious question is how they can reap more benefits from their investments. TV 2 says:

“We cannot afford to build many big formats. We must exploit the ones we have. […] For example, in 2007, I believe that TV 2 will make *Pop*
Idol big both on the web, on radio and on television. This year, VG and Dagbladet [tabloid newspapers] get to exploit Pop Idol because there are many angles we don’t do.24

Whereas press coverage traditionally has been seen as a great advantage, it is increasingly perceived as a problem in that other media get to exploit a successful format that one company has invested much money in. With the growing concentration and cross-media ownership, it becomes crucial that each company find ways to exploit its own successes on all possible platforms, and find ways to direct audience members from one platform to another.

Since TV 2 is the Norwegian TV company which has most eagerly sought to establish subsidiaries and build a conglomerate, it has also had the most explicit strategy for cross-promotion. In 2002 TV 2 bought a popular Internet-newspaper Nettavisen, and in 2004 it invested in a radio channel (Kanal 24). Both were used extensively to promote and direct viewers to its great success, Pop Idol, often with the help of interactive cross-promotion. Viewers voting via SMS in Pop Idol would, for example, get a response message directing them to WAP – from which they could download an interview with the outgoing finalist done by TV 2-Nettavisen only minutes after the show.25

NRK is also a multi-platform conglomerate with TV, radio, Internet, and WAP, and has on many occasions used interactivity to break in new portals. This is most visible in youth programmes, but, as shown, multi-platform media hybrids are used more generally to direct viewers between TV, radio, Internet, WAP, and print media. This is the continuation of the earlier practice where NRK has tried to build stronger links between radio and TV (and also between more and less popular programmes). Nevertheless, since NRK does fewer large formats and more single experiments, the technical solutions and forms of cross-promotion are more varied than on TV 2.

TVNorge’s strategy for cross-promotion differs from both TV 2’s and NRK’s. TVNorge’s strategy is mainly to cross-promote between television and Internet/SMS. The Norwegian Television Authority has reacted against several attempts by TVNorge to direct viewers from television programmes to commercial services on the web, as these have little to do with the specific programme where the invitation to send an SMS is placed. It seems clear that TVNorge is using this primarily as an advertising space, attempting to create tie-ins with attractive programming.26

24 Gunnar Stavrum (see note 17).
25 Status 2, 2004:2, p. 11.
26 Norwegian Media Authority (2005).
Based on the observations above, it is clear that the corporate strategies for interactivity vary between institutions. Whether a company is small or large, public or private, part of a conglomerate or a singular entity, makes its imprint on the way multi-platform formats are developed. What is general, however, is that television companies compete more aggressively for the viewers’ time and try to provide wall-to-wall coverage through different media. Indeed, TV executives increasingly seem to lament that people are doing anything else at all. As stated by a Norwegian TV producer: “Sleep is our biggest enemy – a brutal competitor.”

3 Regulation of multi-platform media hybrids

The development of multi-platform media hybrids has so far taken place in a regulatory vacuum. Television executives clearly see the feedback possibilities provided by SMS as an opportunity too good to be missed, since SMS was less regulated than advertising and sponsorship. Regulators, on the other hand, see multi-platform hybrids as a grey area of media policy, and struggle to understand what the services are really about. As one regulator states: “It is important not to regulate new phenomena too early and thus prevent innovations that might turn out to be in the viewers’ interest.”

A key question for any regulator faced with a new media practice is how the activity fits with existing regulation, and whether the activity should be encouraged or restricted. This implies a normative, legal, and political assessment of the activity, and an attempt to locate it within existing regulatory frameworks. Studies of media regulation indicate that regulatory frameworks are often contradictory: an activity that might be desirable from one point of view may be dubious from another. In a previous study I have distinguished between four regulatory regimes that are all active in media regulation: cultural policy; industrial policy; competition policy; and consumer protection policy (Syvertsen 2004a). An activity may be assessed very differently depending on the framework, and so is also the case with multi-format hybrids.

Within an industrial policy regime, the key question is whether an activity is considered beneficial from an economic point of view. The main issue in today’s

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27 Einar Røhnebæk (see note 21).
28 Eivind Landsverk (see note 30).
29 Øyvind Christensen, Section head, Dept. of Culture, interviewed by Karoline Amundsen, 2004.
industrial policy on both the European and national level is how to build the information society, and activities that aid this goal are considered advantageous. From this perspective it is important not to introduce regulation that would slow down or prevent the development of a digital content industry, and anything that would stimulate people to use digital technology would be considered a good thing (Syvertsen 2004a: 19).30 Regulatory authorities have to take this general policy goal into account when approaching specific media activities. As the Norwegian media regulatory authority states in response to complaints about multi-platform hybrids:

“From our point of view it would be wrong to impose restrictions with a view to prohibit SMS-based chat programmes, etc. The use of SMS services may be seen as a development towards interactive television, which neither children nor young people should be excluded from”.31

From a cultural policy point of view, the situation is more complicated. In the European tradition, the cultural and information role of broadcasters has been considered more important than the economic one, and regulation has been imposed to secure that editorial and commercial activities are kept entirely separate (Syvertsen 2004a: 17-18).32 Multi-platform hybrids muddle this dividing line, as do many new media forms. One regulator points to the conflicts arising from SMS-TV formats:

“We saw that this could be judged in two ways. On the one hand, SMS-TV could be seen as self-promotion in the sense that TV companies encourage the public to send messages that generate revenue for the broadcaster. […] But SMS-TV had another aspect to it, namely that it added to the editorial content and created interactivity with the viewers. From this perspective the revenue streams were only a consequence of the fact that the service was there.”33

Norwegian regulatory bodies have so far decided that as long as there are “visible indications of editorial activity”, multi-platform hybrids will not be treated as advertising. But regulators acknowledge that there are still plenty of thorny issues. Programmes tend to integrate elements that may be plotted at different points on the editorial-commercial continuum: viewers may, for example, be encouraged to buy logos and ring tones at the same time as they are encouraged to contribute editorially

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31 Norwegian Media Authority 2004.
33 Lars Winswold, Section head, Norwegian Media Authority, interviewed by Tor Brekke Skjotskift, 2004.
to the programme. Other issues involve whether hours and hours of SMS-TV really should qualify as “European content”, and whether this content should be considered “democratic” or “of high quality” from the perspective of meeting public service obligations.

From the perspective of consumer protection regulation, the main goal is to guard the public against damaging or unwanted products, secure fair pricing, and ensure that consumers are provided with the necessary information to make rational choices. It is considered particularly important to protect children and other vulnerable groups. Consumer protection measures often come into conflict with other media policy goals – not least industrial policy. Regarding multi-platform hybrids, the biggest problem from a consumer protection perspective has to do with pricing. “I see that parents can get irritated by SMS-TV and want to protect their children”, said one regulator in 2004. “Whether this implies that regulation should be imposed is a political issue: Do parents need help or can they control their children’s telephone bills themselves?”

The Norwegian Ombudsman for Children and Youth has criticised NRK in particular for exploiting young people with SMS services (Enli 2005: 122). In an answer to the Ombudsman, the Media Authority acknowledges that SMS services “amount to a large part of today’s commercial pressure against children and young people”. The Media Authority is nevertheless concerned about not regulating services too strictly, and suggest instead that the actors agree on maximum prices. The hope is that price capping “will make it less likely that broadcasters develop such services only for profit.” This, however, would make the service less desirable from an industrial point of view.

From the perspective of competition policy, the main goals are to combat monopolisation, grant equal access to new markets, and ensure that no businesses are granted unfair privileges. Competition policy has become more influential in recent years, since this is by and large the preferred regulatory framework on the European level (Syvertsen 2004a: 21f.). Competition policy is often at odds with cultural policy – whereas the latter grants public broadcasters a privileged position due to its cultural and informational purposes, the former views these privileges more as a

34 Norwegian Media Authority, 2004.
35 Mess-TV price list: Messages across the screen NOK 30, votes NOK 10, MMS-photo NOK 15, chat NOK 10, nickname NOK 10 (cited from Sivertsen 2005).
36 Øyvind Christensen (see note 37).
37 Norwegian Media Authority 2004.
38 Norwegian Media Authority 2004.
competitive problem. Private broadcasters have systematically protested against the role played by public broadcasters in the new digital universe, and have claimed that the expansion of these broadcasters excludes other operators from new markets. The argument is that since public broadcasters receive public funding, they should not be allowed to develop added-value telephone services and other commercial activities. In other words, from the perspective of competition policy, public broadcasters should not be allowed to do, for example, commercial SMS-TV formats.

These conflicts present difficult challenges to regulators, both on the European and national level. So far, regulators in some countries, such as Norway, have defended the public broadcasters’ right to enter new markets (Syvertsen 2004a, 2005). Bowing to pressures from the European Parliament and cultural interests, the EU Commission has also ruled in favour of the public broadcasters on several occasions (Papathanassopoulos 2002; Levy 1999; Syvertsen 2004a). In many countries, however, limitations apply to public broadcasters, restricting them, for example, from earning a profit on new services (Aslama and Syvertsen forthcoming). Whichever approach is taken, regulators have to assess each service concretely in order to judge whether this is within or without the boundaries of what public broadcasters should be allowed to do.

4 Summary and conclusions

Multi-platform formats play an increasingly important role in television. This can be explained by the fact that interactivity fits with prevailing industry trends. Four such trends have been specifically identified in this paper: turning viewers into customers; exploiting off-broadcast time; brand-building; and exploiting cross-media investments.

These trends are general but work differently in different contexts. For example, I have argued that building programmes around user input is a more tempting option for small broadcasters in small countries. In the Norwegian case, three factors in particular stand out as explanations for the proliferation of interactive add-ons: a liberal regulatory framework that allows even public broadcasters to earn money from SMS and value-added telephone services; several smaller TV channels with little money for programming and many off-broadcast hours to fill; and an advanced

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39 This view is also shared by cultural and consumer interests claiming that public broadcasters are becoming too commercial. This is, for example, the view of the Norwegian Ombudsman for Children and Youth.
information economy with high penetration of mobile telephones and other communication devices.

In Norway, all television companies have embraced and begun experimenting with multi-platform hybrids. Still, different strategies can be clearly discerned. There are differences both between commercial channels and between commercial and public service channels.

The two commercial channels TV 2 and TVNorge have clearly different strategies. TV 2 has been the main champion of turning viewers into customers, and its approach is mainly economic; the key goal is to develop new commercial services to sell to customers in the longer term. TV 2 has a large content production and concentrates on developing large formats that can be marketed and sold through several platforms. The niche commercial channel TVNorge is more experimental; it has little to win from large-scale commercialisation of programmes and services, but more to win from a short-term, risky, and sensationalist approach. For a small channel in a small market with little money available for content production, the greatest advantage of programming based on user input is that it is large-volume: through, for example, SMS-TV it is possible to generate endless hours of cheap programming that might even bring in some revenue.

The approach of public broadcasters is particularly interesting in this respect. Previous research has shown that public broadcasters have fared better than many had expected precisely because these have managed to adapt and change in the face of new technologies (see, for example, Syvertsen 1992, 1997; Søndergaard 1994). For public broadcasters, it is crucial to serve new user groups and experiment also with newer types of programming. The key question is whether public broadcasters remain distinguishable from their commercial competitors, also when experimenting with new genres and new platforms. In this paper I have argued that the strategy of the public broadcaster NRK can be distinguished both from the mass market channel TV 2 and the niche commercial channel TVNorge. NRK does fewer large formats and more single experiments than any of the commercial channels, and has in several instances developed formats that others have copied. NRK’s motives are also less blatantly commercial than either of the competitors, although it’s clear that NRK also expects to earn money from multi-platform hybrids in the long run.

In the introduction I distinguished between formats based on the influence of the user on the end-product. I distinguished between reactive – low degree of influence, reactive – higher degree of influence, and interactive formats where users determine most of the content. All forms can be found on Norwegian television, although it is clear that “reactive” is more dominant than “interactive”. In this sense Corcoran
Trine Syvertsen (2004) is proved right when he claims that TV companies will design “interactivity” that is relatively rigid, controlled from the centre, in the form of responses to requests for information, entertainment, and services. It is clear that “interactivity” is often something that is added to programmes to enhance viewer experiences, rather than the key focus of the activity. TV 2 executives confirm this by saying that it is only after the decision is made to broadcast a show that “the degree of interactivity is considered in relation to right holders and production companies”.

If “interactivity” is viewed as something that is added in order to further exploit the TV format, does this imply that the interactivity is merely “symbolic”? Prebensen (2005), who has studied an “interactive” NRK discussion programme, claims that this is the case. He takes as his starting point the four-fold typology of citizens, audiences, customers, and players/participants used by Syvertsen (2004b) and argues that rather than being focused on involving viewers, interactivity was for the broadcasters a way to make the programme more interesting for the mass audience. In other words, the public was still predominantly viewed as audiences rather than participants (Prebensen 2005: 98). However, Enli (2005), who studies SMS-TV formats, argues that this format seems to integrate all three images of the public: as audiences; customers; and player/participants. Thus, it appears that multi-platform hybrids have already fragmented into different genres with different properties. They have developed beyond the stage where they may all be grouped together and treated like a single entity distinguished predominantly by their “newness”.

The regulation of multi-platform media hybrids is still tentative and the grey areas ample. Like broadcasters, regulators are struggling with thorny questions concerning what these services really are and what forms of regulatory approaches and frameworks would be appropriate. A key question is of course whether these hybrids constitute a new democratic activity that needs to be protected and supported, or a new form of commercialism that viewers should be protected against. Media regulation has been based on the premise that these functions must be clearly separated, but the presence of multi-platform hybrids makes it clear that both viewers and regulators will have to live with less clear-cut demarcation lines in the future.

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40 Gunnar Stavrum (see note 17).
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