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Bridging Cultural Policy and Media Policy in the U.S.: Challenges and Opportunities

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Abstract

Cultural policy and media policy have remained largely distinct fields of research, policy-making, and policy advocacy in the United States. As a result, there has been relatively little cross-pollination of research findings, methodological tools, or advocacy resources and expertise. There are, however, significant areas of overlap between these two fields. Unfortunately, these areas of overlap have not been fully explored, nor have the potential benefits for researchers, policy advocates, policy-makers, of identifying, building upon, and strengthening these points of overlap been considered.

This paper provides an analytical overview of the media policy and cultural policy literatures, in an effort to bridge these persistent disconnects and to explore the potential benefits of strengthening the ties between media policy and cultural policy. Toward these ends, this paper first outlines the substance and boundaries of the fields of media policy and cultural policy. The next section of the paper explores the commonalities shared by the two fields, in terms of both their substantive concerns and their position within the broader policy-making and policy research landscapes. The third section examines changes in the media and cultural landscapes that appear to be driving a tighter integration of media and cultural policy. The fourth section considers the specific benefits to both media and cultural policy of forging stronger bonds between the two fields. The concluding section outlines some specific mechanisms for developing stronger linkages between media policy and cultural policy.

Bridging Cultural Policy and Media Policy in the U.S.: Challenges and Opportunities

Introduction

Cultural policy exists in a rather strange state of limbo in the United States. While cultural policy is a developing academic field in the U.S.,[1] and an active advocacy sector,[2] it has never resonated or developed in the policymaking sector as an explicitly defined and institutionalized field of governmental activity (see Urice, 1983). Instead, it has remained, at best, "fragmentary and ad hoc" (Schuster, 2002, p. 254). Indeed, the U.S. has remained very much on the periphery in terms of developing a meaningful cultural policy infrastructure and in terms of defining the field of cultural policy research, in stark contrast to the rest of the world (particularly Western Europe) where cultural policy represents a legitimate, institutionalized governmental endeavor, as well as a very active and visible field of academic research (Schuster, 2002; Miller & Yudice, 2002).

A number of possible explanations for this arrested development of cultural policy in the U.S. have been put forth. One common explanation is that the terminology itself possesses connotations that are inherently objectionable in an American context (see Wyszomirski, 1995). According to Smith (2000), "for many in the United States, 'cultural policy' seems to elicit images of government intervention, stifling aesthetic controls, or centralized bureaucratic decisionmaking – at worst Soviet, at best French. Suspicions abound that cultural policy is somehow alien to these shores" (p. ix).[3] Similarly, Kammen (2000) notes that the U.S. is one of relatively few nations without some form of a ministry of culture because "the very notion seems politically inconceivable" (p. 114).[4] Indeed, "many have argued that any articulated national cultural policy would be inimical to the American system of artistic and expressive freedom" (Mulcahy, 1991, p. 8; see also DiMaggo, 1983; Wallach, 2000).[5]

The troubling irony of this situation, however, is that the types of policies, and policy concerns, that typically define cultural policy in most national contexts are becoming increasingly

important, and increasingly high profile, within the U.S. Cultural products are becoming an increasingly important component of national economies, as well as an increasingly important component of international trade (see Pratt, 2005). As Bradford (2000) notes, "World economies have shifted from those focused on industrial production to those centered on creativity and knowledge" (p. 12). Consequently, creative activities "drive commerce, employment, and trade the way natural resources and industry have influenced economies and societies in the past" (Bradford, 2000, p. 12), and, as a result, policy attention to the cultural sector increases, as does the significance of cultural policy decisions.

However, this increased centrality of the cultural sector is, in the U.S., taking place alongside virtually no concomitant efforts to establish a focused and robust cultural policy infrastructure (Schuster, 2002). As a result, issues that are in fact cultural policy issues seldom are framed as such. This phenomenon is reflected in Vaidhyanathan's (2005) point that "Although it is common in the United States to assume that culture is in general subject to minimal state influences . . . much of the mechanics and economics of culture are subject to heavy levels of governance from the state" (p. 123). Thus, as Rothfield (1999) notes, "It would be wrong . . . to imagine that . . . America has no cultural policy" (p. 2). Rather, cultural policies are formulated without being framed as such, and thus seldom are formulated or analyzed through a lens primarily reflective of the principles, values, and research approaches that characterize the cultural policy field elsewhere. This exclusion of the cultural policy frame ultimately may itself have significant and damaging repercussions for U.S. cultural policy (even if it is not labeled as such) (see Vaidhyanathan, 2005), and thus may represent a policy problem that needs to be addressed.

One possible mechanism for foregrounding a neglected policy area involves "'policy attachment,' whereby policy development in certain policy areas takes place through the attachment of that area to other (more influential) policy concerns" (Belfiore, 2004, p. 188). This paper considers the prospects of such an approach via the forging of stronger linkages between

cultural policy and media policy – the latter being a policy area which, as will be demonstrated, possesses significant areas of overlap with cultural policy and that today enjoys greater resonance in the U.S. policymaking sector. This paper will demonstrate the substantial areas of overlap that exist between media policy and cultural policy, and illustrate how institutional changes to the media system as a whole, and developments in media technology, are promoting further congruence between the two policy areas. These developments serve as a bridge between cultural policy and media policy and suggest that a tighter integration of the two policy areas is essential for policymaking, policy research, and policy advocacy that accurately reflects contemporary conditions and that reflects the full range of policy values that should be integrated into both media and cultural policymaking.

The first section of this paper outlines the evolving definitions and parameters of both cultural policy and media policy. This section is intended to provide an initial broad-based indicator of how, definitionally, the two fields appear to be increasingly overlapping. The second section explores in greater detail the substantive areas of overlap between the two fields, in terms of their theoretical foundations, policy values, and policy research infrastructure and dynamics. The third section examines contemporary developments in the media and cultural landscapes and how they compel a stronger integration of media policy and cultural policy. The fourth section details how both media policy and cultural policy would benefit from such a tighter integration. The concluding section offers some tangible mechanisms for better integrating media policy and cultural policy, and considers their implications for researchers, policymakers, and advocates. This section also outlines avenues for further research.

Cultural Policy and Media Policy: Definitions and Parameters

The fields of cultural policy and media policy, while in many ways related, traditionally have existed as distinct, seldom overlapping fields of endeavor for scholars, policy professionals, and advocacy organizations. As was noted recently by cultural industries scholar David Hesmondhalgh (2005), "It is remarkable how rarely media policy and cultural policy are

considered together. In the Anglophone world, at least, the two areas of policy have tended to be analyzed as separate domains. Cultural policy usually has been strongly associated with the subsidized arts sector, whereas media and communications policy has tended to be analysed in terms of economics and politics" (p. 95; see also Mulcahy, 2006). Garnham (2005) elaborates on this traditional distinction:

> Historically, there was a clear division between policy towards the arts, based broadly on the principles of patronage and enlightenment and on assumptions of an inherent opposition between art and commerce, and policy towards the mass media, and therefore the provision of mass or popular culture, where the main concerns were press freedom and pluralism, defence of a national film industry, and the regulation and public service provision of broadcasting on grounds of spectrum scarcity. In these cases, policy was based largely on an economic analysis of what, it was always accepted, were large scale economic activities, or industries, operating under market conditions, and on the various forms of market failure that justified regulation. (p. 16)

In the United States, this separation is even more pronounced than in other parts of the world, given the relative underdevelopment (discussed above) of cultural policy as an institutionalized area of policymaking.

It is worth briefly considering the evolving definitions and parameters of cultural policy and media policy, as they have been contested territory in both of these fields (see, e.g., Braman, 2004; DiMaggio, 1983b; Gray, 1996; Volkerling, 1996), before delving more deeply into their substantive similarities. In the cultural policy context, definitional debates (most of which, of course, have taken place outside of the U.S.) have focused on the appropriate breadth of the cultural policy field, as just about any policy endeavor could somehow be interpreted as having a distinct cultural dimension. The focal point of this debate has revolved around the extent to which cultural policy should be defined more broadly than policymaking for the arts. According to Smith (2000), "cultural policy should be considered an expansive term that embraces many

realms of activity. Cultural policy obviously concerns governmental and philanthropic financing for arts and culture, but it also encompasses a range of issues such as freedom of expression, international cultural and artistic exchanges, intellectual property questions, and the effect of corporate consolidation on the nation's artistic life" (p. ix). Similarly, Wallach (2000) argues, "Scholars, practitioners, and policy makers need to redefine 'cultural policy' to mean more than policies toward the arts. They need to imagine culture as influencing the way people live and make sense of their world, and that definition has an impact on politics beyond the funding of arts and cultural institutions" (p. 8).[6]

Reflecting this broader conceptualization of the field, Bennet and Mercer (1996) define cultural policy as "those policies which have a bearing on the conduct of those institutions and organizations which make up the cultural sector. This includes all those organizations, whether public or private, which are involved in the production and distribution of cultural goods and services" (p. 8). A key – as well as controversial – element of such a definition is the extent to which it embraces the commercially-oriented "cultural industries," in recognition of their increased importance to the production and dissemination of the cultural products (see, e.g., Bennett & Mercer, 1996; Girard, 1981). Such inclusiveness has met with some resistance (e.g, Volkerling, 2001). According to Pratt (2005), "One reason for the ambivalent position that the cultural industries occupy is that they are commercially oriented and commonly regarded as mass or low culture. Yet, they are situated under the umbrella of 'cultural policy': a perspective that has traditionally championed elite cultural forms funded from the public purse" (p. 31). Pratt further argues (2005):

> The net result, in the view of some commentators, is a reversal of cultural values and a
> submission to the market as the source of all value. The cultural industries have thus
> become an irritant to cultural policy makers for two reasons. First, the cultural industries
> embody and promote alternative aesthetics and market values. And second, some of the
> contributions of the cultural industries to society (and particularly the economy) can be

measured in economic terms. Thus, for some the co-existence of the cultural industries

with traditional cultural policy undermines the latter. (p. 31)

As these statements suggest, any definition of cultural policy that includes cultural

industries is also a definition that potentially embraces some of the economic policy objectives

that traditionally have been seen as outside the realm of cultural policy (see Hesmondhalgh &

Pratt, 2005). It is also one in which the institutional bases of policymaking become more diffuse,

as more, and more diverse, government agencies then fit under the expanded umbrella of cultural

policy (Schuster, 2002).

Resistance to a definition of cultural policy that embraces cultural industries can be seen

as "rejecting the market" (Garnham, 1987, p. 24), though at the same time ignoring the fact that

"most people's cultural needs and aspirations are being, for better or worse, supplied by the

market as goods and services" (Garnham, 1987, p. 25).[7] Thus, according to Garnham (1987), "If

one turns one's back on an analysis of that dominant cultural process, one cannot understand

either the culture of our time or the challenges and opportunities which that dominant culture

offers to public policy makers" (p. 25).[8] From this standpoint, it would seem that understanding

cultural industries[9] is increasingly important to effective cultural policymaking. It is therefore not

surprising that contemporary analytical frameworks for cultural policy seem to increasingly favor

the inclusion of cultural industries (e.g., Center for Arts & Culture, 2001; Miller & Yudice,

2002).[10]

Turning to media policy, from a definitional standpoint the field has been characterized

as falling within the broader realm of information policy, and addressing specifically those issues

dealing with "freedom of expression and participatory decision making regarding the

fundamental structures of society" (Braman, 2004, p. 179). The fundamental debates within the

media policy realm have focused less on definition and parameters, and more upon the

appropriate weighting of policy priorities and the nature of the possible interactions between

these priorities. Media policy must frequently simultaneously consider both economic and social

policy concerns. As Napoli (1999a) has noted, media policy is distinctive in the extent to which policymakers are asked to simultaneously consider both economic and social policy objectives. Consequently, defining debates in the field involve the appropriate weighting of these policy priorities and the extent to which they are antagonistic or complementary (see, e.g., Entman & Wildman, 1992; Napoli, 2001a) – debates that do, in fact, echo the concerns about the influx of economic policy priorities that are at the center of the expansion of the definition of cultural policy to include cultural industries.

What is not up for debate in the media policy realm is that any valid conceptualization of the field must include a focus on the regulation (from both an economic and social values standpoint; see Napoli, 1999a) of the technologies and industries that disseminate informational and cultural content – industries that inevitably reside at the core of cultural industries policy. Otherwise, the points of intersection between media policy and cultural policy tend to revolve primarily around the realm of public broadcasting (see Coppens & Saeys, 2006; Ouelette & Lewis, 2000), which involves a technological context that fits squarely in the realm of media policy and an aspiration – the production of quality, non-commercial content, unlikely to be provided in a pure marketplace model, aimed at achieving "cultural and social objectives," (O'Regan & Goldsmith, 2006, p. 68) that is well-grounded in the traditional cultural policy paradigm. When the parameters of cultural policy expand to include the full breadth of cultural industries, the rest of the regulated commercial media sector (broadcast television, cable television, radio, satellite, and, to a lesser extent, the Internet) involved in the production and distribution of cultural products falls within its boundaries as well (see Figure 1). This definitional convergence of the fields warrants a deeper exploration of the overlaps and linkages between media policy and cultural policy.

Points of Intersection Between Cultural Policy and Media Policy

This section explores the commonalities shared by the media policy and cultural policy fields. Such an exploration is necessary in light of the infrequency of integrated analyses of these

fields (Hesmondhalgh, 2005), and is intended also to fortify the logical foundation of the subsequent efforts to explore the mutual benefits of forging tighter linkages between media policy and cultural policy. As this section intends to illustrate, these fields perhaps already have more in common than is typically understood.

Theoretical Foundation

Media policy and cultural policy draw from a variety of theoretical perspectives, given the wide range of policy concerns that characterize both of these fields (see, e.g., Ahearne, 2004; Braman, 2004; Kay, 1983; Napoli, 2001a). Both, however, share a common theoretical grounding in democratic theory. The linkage between media policy and democratic theory always has been fairly explicit, as media policy long has been focused, at least in part, on the promotion and maintenance of a media system that fulfills the democratic principles inherent in the "marketplace of ideas" metaphor (Entman & Wildman, 1992; Napoli, 1999c). Media play a key role in the maintenance of a well-informed citizenry that is capable of effectively participating in the democratic process (Baker, 2001; Chaffee & Frank, 1997). Many media policies are premised, at least in part, on impacting the extent to which the media system effectively serves the informational needs of the citizenry, and thus have focused on the journalistic functions of the media and their relationship to the political process (Baker, 2001; Napoli, 2001a).

Like media policy, cultural policy possesses strong, if somewhat less explicit, linkages with democratic theory. This linkage has perhaps been best expressed by democratic theorist Benjamin Barber (1998), who notes, "Imagination is the link to civil society that art and democracy share. When imagination flourishes in the arts, democracy benefits. When it flourishes in a democracy, the arts and the civil society the arts help to ground also benefit. Imagination is the key to diversity, to civic compassion, and to commonality" (p. 111). A similar perspective can be found in a report by the President's Committee on the Arts and the Humanities (2000): "The creative force of the arts and the humanities strengthens our democracy. . . . To

remain a robust civil society, our democratic system needs the arts and the humanities" (p. 71).
And, like media policy, cultural policy has been associated with policies that "regulate the
marketplace of ideas." (DiMaggio, 1983b, p. 242). It is perhaps through this shared guiding
metaphor that the common theoretical grounding of these two policy fields is most clearly
articulated.

Policy Values

To the extent that media policy and cultural policy share a common theoretical
foundation, it stands to reason that they also share a number of core policy values. For instance,
both fields grapple extensively with the principle of diversity, and the role that policymaking can
play in enhancing the diversity of media and cultural products, and the diversity of producers and
distributors of such products, available to citizens (e.g., Bawden, 2002; DiMaggio, 1983a; Lewis,
2000; Napoli, 1999b).

In the cultural policy realm, there long has been an emphasis on the preservation and
promotion of "cultural diversity" (Albro, 2005; Bennett, 2001; Rushton, 2003), which has been
defined as comprising elements such as the cultural preferences of minority groups (Baeker,
2002; Rushton, 2003) and, according to the United Nations Education, Scientific and Cultural
Organization (UNESC) (1995), "the manifold ways in which the cultures of groups and societies
find expression" (art. 4, no 2). The value of cultural diversity from a policy standpoint is seen in
its ability to facilitate social cohesion, to enrich cultural resources in the cultural industries, and to
facilitate cultural development (Bennett, 2001).

In media policy, the Supreme Court's famous statement in *Associated Press v. United
States* (1945), that "the widest possible dissemination of information from diverse and
antagonistic sources is essential to the welfare of the public" (p. 1424) has served as a normative
foundation for a long history of efforts to diversify the information sources available to the
citizenry (see Napoli, 1999b). Multiple dimensions of this diversity concept have emerged over
time, encompassing not only the number and characteristics of the information sources available

to the citizenry, but also their potential reach/influence (Federal Communications Commission, 2003; Napoli & Gillis, in press),[11] and the nature of the content that they provide (Napoli, 1999b). The expressed benefits of diversity in the media policy context have revolved primarily around how democratic decision-making can better function when citizens access as diverse an array of ideas, viewpoints, or opinions is possible (Napoli, 1999b).

Out of this shared policy value comes overlapping concerns in terms of specific policy issues, such as the currently very high profile issue of media ownership (Federal Communications Commission, 2006), which has been addressed extensively in both the media policy and cultural policy literature, given the concerns about the extent to which consolidation in the sources of both informational and cultural products can be damaging both politically and culturally (e.g., Curb Center, 2004; Lewis, 2000; Napoli & Gillis, in press; Ouelette & Lewis, 2000).

Both policy arenas also embrace the principle of localism (see Bawden, 2002; Federal Communications Commission, 2004). In cultural policy, localism often manifests itself in the form of concerns for the preservation of cultural or national identity in light of the increasingly transnational flows of cultural products (see Braman, 1990; Chen, 1992). Many cultural policies (particularly internationally) are instituted in large part to protect or preserve domestic cultures in the face of the importation of cultural products (most often, media products) produced elsewhere, typically from the United States, which dominates the global cultural marketplace (see, e.g., Barnett, 2001; Burgelman & Pauwels, 1992; Harrison & Woods, 2001; McDonald, 1999; Schlesinger, 1997). When localism concerns are expressed at a more micro level in cultural policy contexts, the focus similarly is on the preservation of the distinctive characteristics of local cultures within nations (e.g., Tepper, 2004).

In media policy, localism is grounded in the political value associated with the distribution of political control – including the means of producing and disseminating the information needed by the citizenry (see Cowling, 2005). Compared to the cultural policy context, localism in media poicy is typically articulated at a more granular geographic level,

involving individual communities (cities, towns), and the nature of the media sources available to them (i.e., are they locally owned or operated?), as well as the nature of the content that they provide (i.e., are they providing content produced locally or that addresses local interests and concerns?) (Napoli, 2001b). But once again, the concern is with the preservation of the distinctive characteristics of individual communities, though this time primarily via the serving of their distinctive informational needs.

Access is another policy principle that bridges both the media policy and cultural policy sectors. According to DiMaggio (1983a), "In a democracy, most people agree that great works of culture should be accessible to everyone" (p. 66).[12] Elaborating on this perspective, Bennett and Mercer (1996) state that "Access to cultural resources provides the means through which both individuals and collectives are able to enrich and develop themselves" (Bennett & Mercer, 1996, p. 11). Systemic economic and social inequalities can, however, contribute to significant inequalities in access to cultural goods and services (Bennett & Mercer, 1996). Consequently, "Cultural policy has in many liberal democracies sought to ensure that price and geography do not preclude anyone's *access* to cultural products" (Dayton-Johnson, 2002, p. 450; emphasis in original).

In media policy, access has been articulated in a number of ways. Perhaps the most significant of these involves the citizenry's right of access to a full, diverse, range of sources of information – a right that can, in many contexts, trump the First Amendment rights of individual speakers (see Napoli, 2002). Similar First Amendment tensions characterize the more secondary access rights that have permeated media policy, including a right of access to the means of communication (Barron, 1967; Horwood, 1995), and, related to this, a right of access to audiences (Napoli & Sybblis, in press).   All of these access objectives that have characterized media policy are outgrowths of the ideals inherent in the First Amendment.

Finally, both media policy and cultural policy implicitly (and sometimes explicitly) embrace the policy value of quality.   That is, both media policy and cultural policy must grapple

with the vexing issue of the quality of the media/cultural products available to the citizenry, as well as the question of if and how judgments of quality should be integrated into policy decision-making and policy research (see Nielsen, 2003). In many ways, this policy value is more implicit than explicit in both contexts; in both contexts the appropriateness of policymakers making explicit quality judgments, and formulating policies based upon these judgments, has been a significant question – particularly within the U.S.

In the cultural policy sector, the quality issue manifests itself in the form of the tension between high culture and low or popular culture – particularly in terms of the appropriate extent to which cultural policy should include value judgments about which specific cultural forms/outputs merit promotion and preservation (see Bennett, 2000a). There has emerged a growing dissatisfaction with policymaking approaches that define quality in terms of traditional cultural values, or in terms of traditional elite notions of what is of cultural significance (Belfiore, 2004, Jowett, 2004; Mulcahy, 2006; Ouelette & Lewis, 2000).[13] Bennett (2000a), for instance, argues for a way of measuring cultural tastes and values that "will be 'beyond aesthetics' in the sense of recognizing that, in complex, culturally diverse societies, there is no single hierarchy of cultural values in play of the kind that was supposed in the earlier development of western cultural policies" (p. 4). Thus, today we see a greater focus in cultural policy on the notion of "democratic" culture (semantically, a much more appealing term than "low" or "popular" culture), a concept that is meant to reflect a perspective towards cultural policy that is less elitist in its efforts to promote cultural expression and consumption (e.g., Mulcahy, 2006; Ouelette & Lewis, 2000).

The high versus low/democratic culture tension that has characterized cultural policy in many ways mirrors the debate in media policy over the extent to which policymaking should specifically address the quality of media content available to the citizenry.[14] Former FCC Chairman Newton Minow's (1978) famous "Vast Wasteland" speech, in which he vilified the television industry for its poor quality of programming, exemplifies the continuing tension in the

media policy sector about what, if anything, can – or should – be done from a policy standpoint to address what is perceived in many quarters as the low quality of programming being provided by the regulated industries, particularly if all indicators are that such programming is extremely popular with the general public, while more traditional "high quality" programming (e.g., hard news public affairs, educational programming) is not.

When Reagan-era FCC Chairman Mark Fowler articulated his regulatory philosophy that "the public's interest . . . defines the public interest" (Fowler & Brenner, 1982, p. 4), he was articulating a philosophy that placed issues of the perceived quality of media content outside of the FCC's zone of concern, with consumer choice and market forces dictating completely the nature of the content available.[15] There has, however, been something of a pendulum swing, and today, many media policy concerns, such as media ownership, cable a la carte, and indecency, are in fact at least partially motivated by concerns over the quality of the content provided by the media system and whether there are mechanisms for improving the quality of content available, while avoiding overt, somewhat paternalistic, content requirements likely to run afoul of the First Amendment (see Yoo, 2005).

Research Infrastructure/Dynamics

Cultural policy and media policy also share a number of traits in terms of the research-policymaking relationship. There is, for instance, a shared concern across the media and cultural policy sectors that researchers are not contributing sufficiently to policymaking, and for many similar reasons. Looking first at cultural policy, Kurin (2000) assesses cultural scholars' contribution to cultural policy as being "relatively minor, their engagement limited" (p. 339). Similarly, Bennett and Mercer (1996) claim that "research plays a less-developed role in cultural policy formation than is true of other areas of policy" (p. 6), a phenomenon that the authors attribute to a variety of factors, including the disciplinary fragmentation that characterizes the cultural policy research community, the tendency towards the dispersal of cultural policy authority across a wide range of government agencies,[16] the highly political nature of cultural

policy decisions (which allows political considerations to eclipse research in the decision-making process), and the undervaluaing of research in many cultural policymaking sectors.

A persistent resistance among certain scholarly communities to engage in the cultural policymaking process also has frequently been noted as a causal factor for this state of affairs (Ahearne, 2004; Bennett, 2000b, 2004; Craik, 1995). For instance, within the cultural studies field there has been a long-standing debate over the appropriateness of engaging in the policymaking process that has kept many scholars in the field from engaging policymakers when given the opportunity.[17]

Similar concerns regarding the marginalization of certain research traditions have long been expressed in the media policy realm as well, where it has been noted that few disciplines beyond law and economics have systematically contributed to media policymaking (Napoli, 1999a). Other relevant social sciences such as political science, sociology, and communications have stayed at the margins. Possible reasons again include a hesitancy among some scholars to engage in "applied" policy research and disciplinary fragmentation (Mueller, 1995; Noam, 1994), but also skepticism within the policy community to research traditions outside of their more familiar areas of expertise (Napoli, 1999a).

To a certain extent, this issue of researcher engagement in the policymaking process is a reflection of the broader issue of the nature of the research that is typically demanded by – and that resonates with – policymakers in both of these fields (see Nylof, 1997). In both policy areas, policymakers typically prefer large-scale quantitative analyses over the more qualitative or interpretive work that characterizes many of the fields capable of contributing cultural or media policy (e.g., anthropology, communication/media studies, cultural studies; see Napoli, 2005; Napoli & Seaton, 2006). As one policy professional has candidly acknowledged in regards to the cultural policy context, "Fairly traditional research methods are applied . . . and, of these, there tends to be an emphasis on quantitative rather than qualitative methods. This is surely not unusual in government agencies where the emphasis on 'hard data' and 'real research' could be

seen as a rather exaggerated response to the view that research must be objective, 'value-neutral'

and apolitical. Qualitative methods tend to be looked on somewhat skeptically as being a little

too warm and fuzzy…" (Layne, 1994, p. 53).[18] This perspective on the part of policymakers is

the outgrowth of long-term trends not only in both media policymaking (Napoli & Seaton, 2006)

and cultural policymaking (e.g., Nylof, 1997), but across virtually all other policymaking sectors,

in which there has been a strong trend towards more evidence-based policymaking (see Belfiore,

2004).

Of course, such approaches bump up against questions related to the feasibility of

"considering 'culture' scientifically" (Simonin, 2003, p. 121). Nonetheless, this appears to be a

path that researchers must follow if they are to have any chance of participating in, or influencing,

media or cultural policy. Tony Bennett (1992) addresses this concern within the cultural policy

context as follows:

> Increasingly, governmental calculations about how vast amounts of public money will be
>
> spent in the cultural sphere are made on the basis of performance indicators.
>
> Determining the parameters within which performance indicators are defined and
>
> interpreted is thus of considerable importance. If we let them be defined through the
>
> operation of crude economic rationalist criteria, the cultural consequences for specific
>
> communities . . . would be devastating. So the political need to intervene, very directly
>
> and centrally in the forms of statistical calculation the major cultural bureaucracies make,
>
> and are obliged to make, is thus vital. In this regard, people with the capacity to do
>
> sophisticated statistical and economic work have a major contribution to make at the
>
> cultural studies/policy interface – perhaps more than those who engage solely in cultural
>
> critique. (p. 35)[19]

This perspective is mirrored in the media policy context by Napoli (2005) who argues that:

> to refrain from such [empirical] work, in light of the extent to which the absence of
>
> empirical evidence supporting a particular policy is, in the contemporary policymaking

environment, virtually as damning as empirical evidence undermining a particular policy; and the extent to which contrary research from other sources that is poorly designed (intentionally or unintentionally) can be injected into the policymaking process, means that scholars and advocates concerned with the role of the media in a democratic public sphere must, in many ways, choose between the lesser of two evils. One is to cede the increasingly influential empirical space that policymakers increasingly are asking to have filled to those who may have different policy priorities. The other is to risk undermining the policies and principles at the core of the role of the media in a democratic public sphere by treating these principles and policies as requiring empirical support via methods that may in fact be somewhat ineffective in doing so. . . . Only the latter choice possesses an important potential upside – the production of empirical work that does support principles and policies related to preserving and enhancing a democratic public sphere, thereby bolstering their standing in the policymaking process. (p. 6)

As these passages suggest, this preferencing of quantitative over qualitative research by policymakers typically parallels an increased preference for economic analysis over other analytical approaches – a development that has been the focus of substantial discussion and debate in both the media policy and cultural policy sectors. Beginning with the work of Baumol and Bowen (1966) on the economics of funding for the arts, economic analysis has become increasingly prominent in cultural policy research (See Peacock, 1991; Rushton, 2001).[20] However, scholars within the field of cultural policy frequently have criticized the application of traditional economic approaches (e.g., Sunstein, 2002), noting among other things, that the tendency to avoid value judgments that characterizes economics is fundamentally inappropriate in cultural policy contexts (e.g., Caust, 2003; Ridley, 1983), and that the values that are inherent in the economics discipline (efficiency, consumer sovereignty)[21] often are incompatible with

effective cultural policymaking and policy analysis (e.g., Caust, 2003; Ridley, 1983; Rothfield, 1999).

A similar tension in the media policy realm has developed in terms of the extent to which economic priorities and economic analysis should drive decision-making (see Napoli, 1999a). To the extent that media policy has a more traditional grounding in economic policy concerns (given policymakers' authority over marketplace and competitive conditions in the commercial electronic media industries), the dynamics of this tension are somewhat different; the tension is focused less on the issue of whether economic policy objectives and analysis are at all appropriate in the media policy context, and more on the *extent* to which they should be prioritized over social policy objectives such as diversity and localism (Cavanagh, 2003; Entman & Wildman, 1992; Huber, 1997; Stucke & Grunes, 2001). Over the past two to three decades, economic concerns and economic analysis have begun to eclipse other policy priorities and analytical approaches, though recent years suggest a return to a more balanced perspective (Napoli & Gillis, in press).

In both the media policy and cultural policy contexts, then, there remains significant tension over the appropriate extent of reliance upon market forces to produce desired outcomes, as both fields remain consistently enmeshed in a "struggle between the individual as consumer and the individual as citizen" (Nielsen, 2003, p. 244, emphasis added). The argument against reliance on market forces expressed by Lewis (2000), who, in dissecting the nature of the incentives that characterize commercial providers of media and cultural products, argues that "The idea that the free market is the best mechanism to serve a society's cultural needs . . . is deeply flawed. We may want – or need – diversity, but market forces make homogeneity (where the markets are bigger) more profitable. We may, as a society, want innovation, but as individual consumers we are unlikely to find an acceptable way of paying for such a costly commodity in the marketplace" (p. 84).

Forces of Convergence in the Media/Cultural Environment

This paper has documented a number of significant areas of overlap between cultural policy and media policy. As has been illustrated, these areas of overlap are definitional, theoretical, normative, and applied. This section will illustrate that contemporary developments in the realms of media and cultural production and consumption are further compelling an increased convergence between media policy and cultural policy. Specifically, *the substantive distinction between news/information and leisure/entertainment content that traditionally has helped cleave media policy and cultural policy is rapidly disintegrating*. Also, the contemporary environment for cultural consumption is one in which media play an increasingly prominent role. These developments require approaches to policymaking, policy research, and policy advocacy – for both media and cultural policy – that enlist the full range of analytical tools and advocacy resources contained within both fields.

♦ *The Fading News/Entertainment Distinction*

Traditionally, there has been a common tendency to separate media policy and cultural policy along roughly drawn lines separating news and information from arts and entertainment (Garnham, 2005; Hesmondhalgh, 2005). Cultural policy traditionally has concerned itself with the production of what could broadly be defined as arts/entertainment products (e.g., music, live performances, exhibits), and the *cultural* benefits associated with the production and consumption of such; whereas media policy traditionally has primarily concerned itself with the production of information products (e.g., news, public affairs) and the *political* benefits associated with the production and consumption of such products.

The importance of this distinction is certainly open to debate, particularly in light of the extent to which the broader significance of media policy and cultural policy are both grounded in democratic theory (see above). Nonetheless, the distinction has persisted, with the two areas of production and consumption developing their own distinctive, largely non-overlapping, bodies of theory, research, advocacy, and, for the most part, policymaking (Hesmondhalgh, 2005).

The contemporary media and cultural environment is, however, one in which the logic of this distinction must increasingly be called into question, in light of the continued blurring of informational and entertainment products, and, more broadly, of the political and the cultural. Thus, for instance, for some sectors of the population, humor programs such as Comedy Central's satirical *The Daily Show* are cited as the most important source of news and information (Pew Research Center for the People and the Press, 2004). The medium of film, which had evolved (particularly in the U.S.) primarily into a commercial-artistic hybrid focused on entertainment, appears to be growing increasingly politicized, with the prominence of politically charged documentaries in the multiplexes (Clark, 2004; McIntyre, 2004). In addition, the management of cultural institutions such as PBS and National Endowment for the Arts increasingly seems to have an eye on the political dimensions of the output supported by these organizations (Koch, 1998; Konz, 2005). In these ways, the arts/entertainment versus news/information and politics versus culture divides that traditionally have segregated media policy from cultural policy are breaking down. For the two fields to not converge accordingly (see Figure 1) would reflect a failure to adapt to changing environmental conditions.

♦ *Media Technology and the Consumption of Cultural Products*

Technological developments are taking place that also compel the forging of stronger linkages between media policy and cultural policy (see Figure 1). Media technologies increasingly can – and do – serve as the mechanism by which culture is transmitted and consumed. Consumption of culture can take a number of increasingly mediated forms (Feigenbaum, 2004). Films can be consumed in theaters, on-line, or on I-pods or hand-held video game devices. Music consumption similarly has been liberated from the confines of the concert hall or the radio. Other traditional cultural products, ranging from art exhibits to theater, dance, and opera performances can increasingly be accessed by a variety of media platforms, whether they be home video, the Internet, or interactive television services (Ogrodnik, 2000; Suoranta, 2003). Research shows that while consumption of traditional high culture products is declining,

consumers of such cultural products also are increasingly "omnivorous," consuming these products alongside the kinds of popular culture products typically provided by the mass media (Peterson, 2005).

Increasingly, citizens will be "accessing the cultural infrastructure through new media" (Bawden, 2002, p. 54) and an understanding of these processes, as well as the associated interactions that take place between consumer and producer, are going to become increasingly central to well-informed cultural policymaking (Mercer, 1994).[22] At the same time, media technologies are increasingly empowering individual citizens to take part in the production and dissemination of cultural products, thereby completely reconfiguring the traditional dynamics between producer and consumer of cultural goods (Feigenbaum, 2004; Vaidhyanathan, 2005).

According to Venturelli (2001), "the information technology revolution has altered the stakes and made cultural policy the precondition of how to ensure a creative and innovative society" (Venturelli, 2001, p. 22). The same could – and should be said for media policy, as media policy increasingly needs to be looked upon as the instrument for fulfilling many of the objectives that traditionally reside at the core of cultural policy. If it is indeed the case that "Cultural policy . . . cannot be separated from the great changes in the mode of distributing images throughout the world" (Bawden, 2002, p. 24), then it is inevitably also the case that cultural policy and media policy should become better integrated. Any efforts, therefore, to maintain what is increasingly an artificial distinction are potentially harmful to policymaking, policy research, and policy advocacy that reflect contemporary conditions.

Mutual Benefits of a Stronger Linkage Between Media Policy and Cultural Policy

The previous sections of this paper have demonstrated a number of significant areas of overlap between media policy and cultural policy, as well as how changing conditions in the media and cultural landscape are compelling greater overlap between these two policy fields.

This section seeks to demonstrate the specific benefits to both media policy and cultural policy, individually, that could arise from a tighter integration of the two fields.

As was noted previously, cultural policy has, in the U.S., largely failed to cohere or to resonate as a distinct, institutionalized policy field, due to what essentially are semantic challenges associated with the cultural policy terminology (and, by association, the cultural policy analytical framework). If these challenges can not be overcome in the U.S. in any significant way, the strategy of policy attachment, in which *the* (as has been illustrated) increasingly overlapping area of media policy becomes the mechanism for foregrounding cultural policy-related concerns, may represent a useful strategy for better integrating the values and research methods associated with cultural policy into relevant policymaking contexts. Many of the policy concerns, it has been illustrated, are already shared across these two policy areas. In addition, it also has been illustrated how changes in technology and content can facilitate (and indeed, compel) this kind of tighter integration of the two fields. Media policy, it would seem, is increasingly becoming the platform on which cultural policies are being made, as well as an increasingly important point of focus for cultural policy more broadly, given the increased prominence of media technologies in the production and consumption of culture. Thus, systematically placing greater focus on the media policy issues with cultural policy ramifications, and identifying cultural concerns in those media policy issues where such concerns might not be superficially clear, is a potentially valuable strategy for better integrating the values and analytical tools of cultural policy into contemporary U.S. policymaking

Such stronger integration also is a potentially effective mechanism for better incorporating the values and analytical tools of cultural policy into a policymaking context – media policy – where they are increasingly necessary for well-rounded analysis and decision-making. That is, to the extent that the field of media policy field historically has failed to sufficiently consider the cultural dimensions of its policy issues, a mutually beneficial fit could be

achieved. This failure on the part of media policymakers is well illustrated by DiMaggio (1983b), who sees the neglect of cultural issues as a deliberate strategy of marginalization:

> One strategy, available only to those agencies whose programs affect cultural production indirectly, is denial. Thus the FCC has traditionally treated its role as one of technical and economic regulation. By attending to questions of the relative merit or economic feasibility of competing technologies without considering their cultural consequences, the FCC has set the constraints within which American mass culture has developed without assessing seriously the impact of its decisions." (p. 247)

Given this situation (as prominent now as at the time of DiMaggio's observation), there needs clearly to be a stronger recognition within the media policymaking sector of the relevance of policy actions not only outside of the economic realm, but also outside the political realm. That is, policies reflecting the normative principles of diversity, access, and localism, as well as the research and advocacy work conducted on their behalf, need to consider the cultural dimensions of these policies as much as they consider the political. As has been illustrated, the distinction between the political and the cultural in relation to media and cultural products is rapidly disintegrating, while at the same time the media increasingly serve as the mechanism for transmitting and consuming traditional cultural products. Moreover, the cultural policy literature illustrates fairly clearly that principles such as diversity, localism, access, and quality are as rife with cultural significance as they are with political significance. To neglect this fact is to engage in somewhat myopic media policymaking, research, and advocacy. An approach to media policy that is better grounded in cultural policy could, then, contribute to more robust and well-rounded media policymaking.

Conclusion

This paper has developed a case on behalf of a stronger integration of media policy and cultural policy, from the standpoint of policymaking, policy research, and policy advocacy. The key question that this position raises, of course, is what exactly does a stronger integration of

cultural policy and media policy look like? That is, what are the concrete steps towards realizing this objective?

From a policymaking standpoint, a more integrated media/cultural policymaking apparatus would, in the U.S., need to begin first and foremost with some sort of meaningful federal institution for cultural policymaking – one that perhaps extends from and builds upon the established media policy infrastructure. Internationally, we see more developed efforts along these lines, in which, from a policymaking institutions standpoint, media and cultural policy are better integrated[23] Such efforts help to "de-fragment" areas of policymaking that, it has been shown, overlap in a number of important ways, thereby facilitating the sharing and cross-pollination of knowledge, experiences, research, and expertise that can contribute to more internally and externally consistent policymaking – policymaking that is more responsive to, and reflective of, changing environmental conditions. Future research should engage in cross-national analyses of integrated media and cultural policymaking institutions in an effort to better understand how policymaking in such national contexts differs from contexts in which media and cultural policymaking are institutionally separated.

Absent major institutional change in the U.S., better integration of media policy and cultural policy could still be achieved via the more thorough absorption of the cultural policy priorities and values that are at the center of cultural policy into the analytical frameworks and policy priorities that currently characterize media policy (see Aslama & Trine, in press), where cultural policy priorities are marginal at best, lagging behind political policy priorities and even farther behind economic policy priorities. As this paper has illustrated, the political-cultural distinction that traditionally has separated media and cultural policy is diminishing, making cultural concerns increasingly in need of attention from media policymakers. As Harrison and Woods (2000) state in regards to European media policy, "policy needs to be refocused away from acceptance and incorporation of market forces towards more democratic and inclusive policies which will ensure that minorities are catered for, and diversity and quality of content are

fostered whilst culturally specific values and judgments are respected" (p. 490). European media policy has been responsive to this call (Aslama & Trine, in press), though U.S. policymaking has yet to similarly follow suit.

From a research standpoint, certainly additional efforts to integrate the largely separate bodies of literature associated with the media policy and cultural policy fields would be an important first step, as would the establishment of academic research centers not only with expertise across both areas, but with the intellectual capacity to explore much more extensively the benefits of more holistic approaches to media and cultural policymaking, policy research, and policy advocacy. It is worth noting that academic coursework in media or cultural policy is, today, virtually non-existent in U.S. public policy schools. To the extent that such coursework, and the associated researchers, are found instead in media and cultural studies programs, the researcher-policymaker interaction that is important to effective policymaking (see Napoli & Seaton, 2006) is stunted by the historic marginalization of these academic units from the policymaking process. Placing media and cultural policy within the broader institutions of policy scholarship could go a long way towards strengthening these areas of policy research and their interaction with the policymaking process. The success of such an endeavor, would, however, depend upon acceptance of theoretical and methodological approaches to policymaking that extend beyond how the field of public policy traditionally has been defined – reflecting the fact that media and cultural policymaking are very distinctive policymaking contexts in relation to more traditional policymaking areas (see DiMaggio, 1983b; Napoli, 1999).

From an advocacy standpoint, there likely are opportunities for collaboration and joint endeavors across media and cultural policy advocacy organizations that could enhance the overall impact of the public interest sector on these policy issues. A fairly casual scan of the media policy and cultural policy advocacy communities in the U.S. suggests that more "bridging" advocacy organizations – in other words, organizations that are squarely grounded in the areas of overlap between the media policy and cultural policy areas (e.g., cultural industries, free

expression),[24] would go a long way toward better integrating these two fields in the public interest/advocacy sector.

Ultimately, an approach to media policymaking that is more firmly grounded in cultural policymaking would be exactly the kind of progressive, socially-conscious policymaking framework that the public interest/advocacy communities have been advocating for years. Hopefully, drawing more heavily upon the theory, research, and normative values of cultural policy could be an effective mechanism for promoting this kind of policymaking framework.

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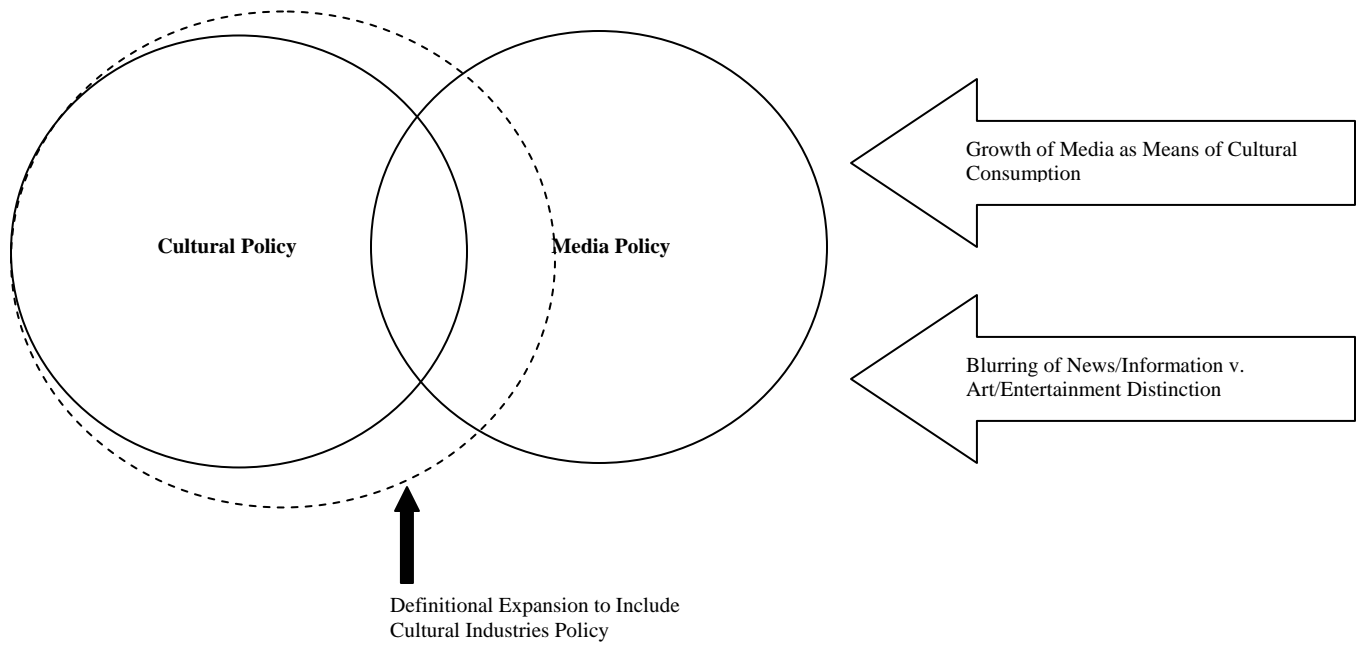
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Figure 1: Cultural Policy and Media Policy: Definitional Expansion and Drivers of Convergence

Cultural Policy

Media Policy

Growth of Media as Means of Cultural Consumption

Blurring of News/Information v. Art/Entertainment Distinction

Definitional Expansion to Include Cultural Industries Policy

Endnotes

[1] See, for example, the Center for Arts and Cultural Policy Studies at Princeton University (http://www.princeton.edu/~artspol/), the Cultural Policy Center at the University of Chicago (http://culturalpolicy.uchicago.edu/), and the Curb Center for Art, Enterprise, and Public Policy at Vanderbilt University (http://www.vanderbilt.edu/curbcenter).

[2] See, for example, Americans for the Arts (http://www.artsusa.org) and the Free Expression Policy Project (http://www.fepp.org).

[3] According to Rothfield (1999), "One difficulty is that the term 'cultural policy' suffers by association with an all-too-well-defined history of Stalinist or fascist cultural commisars. Ministries of Culture, and the monstrous perversion of arts and humanities into propaganda machines. 'Cultural Policy' with a capital P strikes many as an 'un-American' activity" (p. 1).

[4] See Kammen (2000) for a detailed history (or lack thereof) of U.S. cultural policy, as well as an analysis of why an institutionalized cultural policy apparatus has failed to develop in the U.S.

[5] Such an environment may help explain why the Washington, D.C.-based research center devoted to cultural policy, the Center for Arts and Culture, recently shut down after 11 years of operation and why the U.S. still "lacks informed policy analysis of the cultural industries" (Schuster, 2002, p. 258).

[6] For similar arguments, see Bonetti and Madden (1996), who argue that "government interest in culture broadly defined should be more intense than government interest in the arts. The broad arguments for government interest in and involvement in culture are more compelling than the narrow arguments for the intervention in the arts industries. That being so, it is appropriate that government policy and resource allocation should focus on a broad definition of culture" (p. 264).

[7] See Sassoon (2005) for an analysis of the impact of market forces and assumptions on cultural production.

[8] It is worth noting, however, that Garnham (2005) takes particular issue with the adoption of the "*creative* industries" terminology as a replacement for the "*cultural* industries" terminology – a shift that he sees as a deliberate effort by policymakers to couch what has traditionally been called cultural industries policy within the wider context of information society policy, thereby contributing to the conceptualization of the cultural sector primarily as an economic growth sector, and motivating policymaking that first and foremost approaches it as such, to the neglect of other important policy values.

[9] See Hasitschka, Tschmuck, and Zembulas (2005) for an overview of the related field of "cultural institutions studies."

[10] As Miller and Yudice (2002) note in their advocacy of a more inclusive definition of cultural policy: "Many studies of cultural policy exclude music, film and television because of their relationship to profit-making and the fact that they tend to full under the rubric of communications rather than culture . . .. But it is precisely because of the dominance of these entertainment industries that nations institute cultural policies" (p. 72).

[11] The Federal Communications Commission's (2003) much-maligned Diversity Index was particularly notable for the extent to which it attempted to account for the influence potential of the different media sources available to citizens (see Napoli & Gillis, in press).

[12] For a thorough analysis of the access principle, its place in cultural policy, and the key barriers to access to the "cultural infrastructure," see Bawden (2002).

[13] Mulcahy (2006) argues for "cultural democracy," the objective of which is to "provide for a more participatory (or populist) approach in the definition and provision of cultural opportunities" (p. 324).

[14] For a discussion about this issue at the intersection of the media policy and cultural policy realms, see Ouelette and Lewis' (2000) examination of U.S. television policy.

[15] A similar trend towards "wants-based" policymaking has characterized UK media policymaking in recent years (see Pratten, 1998).

[16] As Mulcahy (2006) notes, "there are many more agencies involved in cultural policy than is conventionally understood. . . . [and] it is uncommon that one would think of the aggregation of these agencies and their activities as constituting a conceptual whole" (p. 322).

[17] According to Ahearne (2004):

> Within the fields of cultural studies and the sociology of culture, there has been a
> vigorous "debate concerning the roles of intellectuals and the relationships they should

adopt in relation to the bureaucratic and political processes through which cultural policies are developed and put into effect." Such debates have tended to oppose those advocating practical engagement in policy processes and those for whom such engagement implies the abdication of critical integrity on the part of the intellectual. (p. 9, citing Bennett, 2000, p. 1)

Braman (2003), provides an illustrative account of U.S. cultural studies scholars rejected invitations from the newly-elected Clinton Administration to provide advice and consultation as the administration formulated its cultural policy agenda. This scenario of disengagement came on the heels of what Gripsrud (1998) describes as a much stronger period of connection between cultural studies and policy in the 1970s. Much of this debate reflects a schism between "applied" versus "critical" cultural policy research (see Scullion & Beatriz Garcia, 2005, p. 118; see also Bennett, 2004).

[18] This same policy professional also notes: "While cultural studies is a term that very loosely describes a diverse theoretical field and set of positions, it is an area which is often perceived, quite simplistically, as being a difficult and esoteric domain. I think it is fair to say that 'the academy', and specifically cultural studies, gets 'bad press' in the arts bureaucracy" (Layne, 1994, p. 54).

[19] See also Wyszomirski (1995), who argues that resistance to evaluating cultural policies allows opponents of those policies to determine the performance standards that will be applied and to dominate the assessment process when it does, inevitably, occur.

[20] For a discussion of the Baumol and Bowen (1966) study and its impact, see Kay (1983).

[21] For discussions of the assumptions, policy values, and methodologies that characterize an economic approach to cultural policy, see Horn (1983) and Peacock (1991).

[22] As Mercer (2004) notes, "We know so little about the current configurations of our cultural behaviour that we cannot hope, without a significant boost in research effort and funding, to know not only about the cultural industries about which we have been ignorant – at least in our policy frameworks – for so long, *but also about the implications and effects of communications and information technologies which are steadily and radically transforming the cultural landscape"* (p. 22; emphasis added).

[23] See for example, the UK's Department of Culture, Media and Sport (http://www.culture.gov.uk/); or, in France, the Ministry of Culture and Communication (http://web.culture.fr/).

[24] Possibly illustrative "bridging" organizations would include the Center for Creative Voices in Media (http://www.creativevoices.us) and the Free Expression Policy Project (http://www.fepp.org), two organizations that regularly address policy issues, and espouse policy priorities, that extend across traditional media policy – cultural policy boundaries.