

## Policy Alignment in the European Audiovisual Sector: The View From Estonia

### 1. Introduction

The audiovisual policy changes in the process of implementing the Digital Single Market (DSM) have been accompanied by criticism and heated debates, especially among audiovisual industry players who fear that their financial interests face an uncertain future under the new policies. [This stands in sharp contrast with the European Commission \(2017\) statement that the DSM directive “aims to open up digital opportunities for people and businesses.”](#)

Aware of this skepticism, the European Commission (EC) has communicated numerous benefits of its policies. Without going into detail about the nature of the policy changes, this chapter takes a look at the benefits of European audiovisual policy that the EC promises, and it tries to understand how these proposed benefits are evaluated by industry stakeholder in Estonia. In detail, it looks at how each of the proposed benefits aligns with what industry stakeholders in Estonia see as important for the audiovisual industry, in general; what they see as important for their own professional interests; whether they believe that a policy change was necessary to achieve the promised benefits; and whether they think that a policy change would be effective.

This chapter uses the term, “policy alignment,” in a very straightforward way. Accordingly, policies are aligned to their industry stakeholders when they match their values, needs, and priorities. Though a wealth of research on the impact of policies on markets and industries exists, our chapter addresses a gap in research on policy alignment. Though policy alignment, as we see it, is essential for the effectiveness of policies, we found that the term, “policy alignment,” has not been used much in policy literature, especially not in works on European audiovisual policy.

For studying policy alignment, Estonia is an interesting case study for various reasons: As one of the smallest member states in the EU, its audiovisual industry faces a lack of domestic demand and resources, facts that may disadvantage the country in international competition and make it more vulnerable to policy decisions aimed at creating a single European market. [By focusing on Estonia, the article contributes to literature on small audiovisual markets that has been largely Western centric so far \(e.g. Donders, Pauwels, & Loisen, 2016; Puppis, 2009; Raats, Evens, & Pauwels, 2015; Raats, Evens, & Ruelens, 2016; Van den Bulck, d'Haenens, & Raats, 2018\).](#) ~~On the other hand~~ Furthermore, Estonia is an interesting case study, as [the country is known for its rather neo-liberal and free-market approach; something that is not commonly](#)

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associated with policies in small markets that often follow an interventionist and protective approach. Estonia, with only 1.3 million inhabitants and a former country of the Soviet Union fits very well the description of a small state that lacks the size, wealth and maturity of its national media industry to protect its own national interests from globalization forces (Puppis, 2009; Weiss, 2010). Yet, the European Commissioner in charge of the DSM strategy until July 2019 was none other than Estonia's former Prime Minister, Andrus Ansip, who has been generally supported by his fellow countrymen, he stands for a rather typical Estonian in its liberal policy neo-liberal and free-market approach. In the light of the general background in Estonia, we hypothesize that the stakeholders in the Estonian audiovisual industry will agree with the EC reforms proposals of the DSM that follow a liberal policy approach. Hence a policy alignment, that we set out to investigate, will be to the benefit of a more liberal policy approach and not so much to the interventionist approach, as this is often defended in other national context (Puppis, 2009).

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By conducting a document analysis to identify the promised benefits in the EC texts, as well as an online survey to identify how industry stakeholders in Estonia evaluate these benefits, this chapter gives insights into what is important for industry players as opposed to what is important for the EC. It discusses various degrees of alignment for different benefits, and it will show, among other things, that policy benefits for small companies and small markets are especially important for stakeholders.

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## 2. Background

### 2.1 European Audiovisual Policy

Though EU member states have maintained their media policy competences in politically sensitive areas such as media pluralism, media ownership, and public service media, they have adapted to European Union (EU) media policy recommendations that promote the harmonization of national policies. The objective of EU audiovisual policy is to strengthen audiovisual industries in Europe and to support cultural exchange among member states. Reflecting the predominantly pro-liberal and pro-competition aims of the EU Treaty, the EU's policy output has always prioritized economy and competition, while the pursuit of democratic, social and cultural objectives have remained responsible for democratic, social and cultural objectives within the constraints of EU policies (Michalis, 2016). In this context, the balance of interests and values of European audiovisual policy have not been static, but evolving over decades to even further economic and industrial objectives over cultural and democratic ones (Iosifidis and Wheeler, 2016). While EU media policy has traditionally aimed at avoiding media concentration in favor of promoting media diversity and

[pluralism](#), Iosifidis (2011) points to a “new paradigm” of EU media policy that prioritizes economic goals over social and political welfare. [This phenomenon is also noted by Robin Mansell \(2011 p.11\):](#)  
[“Audiovisual media policy has become interchangeable with policies aimed at the enforcement of market relationships through the commodification of information, including media content.”](#)

Indeed, market competition has become an important value and guideline in EU media policy, which encourages cooperation between member states (Michalis, 2016). The main intention of EU audiovisual policy in this context is the creation of a single European market for audiovisual services, i.e. a market without internal borders for the free movement of goods and services within the EU. A key regulatory instrument for designing the single audiovisual market is the Audiovisual Media Service Directive (AVMSD), which binds member states in terms of achieved results, though it leaves the manner in which member states achieve these results up to the respective national authorities (Michalis, 2016).

[EU policies concern mainly liberalization, and](#) ~~While~~ the predecessor of the AVMSD, the Television Without Frontier Directive (TWFD), aimed at creating an internal market through the reregulation and liberalization of cross-border broadcasting, [confirmed this pro-competition trend. The TWFD left politically sensitive areas such as culture, content, pluralism and media ownership to be regulated on the national level. \(Michalis, 2016\).](#) ~~The~~ AVMSD of 2007 extended ~~that the policy~~ approach to nonlinear services and platforms, i.e. video-on-demand, [thereby confirming the jurisdictional balance between the EU and the national states](#) (Humphreys, 2009; Iosifidis, 2011; [Michalis, 2016](#); Nowak, 2014). In 2016, the European Commission (EC) proposed a new revision of the AVMSD with the aim to further converge regulations for different content transmission methods. Adopted in November 2018, the new AVMSD includes a revised approach to online platforms disseminating audiovisual content. This includes a strengthened Country of Origin Principle, stipulating that providers need to abide by the rules of only one member state, as well as increased obligations to promote European works for on-demand services. In addition, certain rules are extended to video sharing platforms, such as YouTube and Facebook (European Commission, 2018)(Ibrus & Rohn, 2016).

With the aim of achieving a single audiovisual market, another area for modernization has been the adaptation of EU copyright rules to the digital age and to new consumer behavior. A first legislative proposal in 2015 included regulation of the cross-border portability of online content services in order to ensure that consumers who buy and subscribe to content in one member state have access to it in all other member states (European Commission, 2019a). Another area is “the creation of a well-functioning

marketplace for copyright,” as the EU calls it. This includes, among other things, a reinforced position of rights holders to negotiate and be remunerated for the online exploitation of their content on video-sharing platforms, and the remuneration of authors and performers via new transparency rules (European Commission, 2019b). These new copyright rules were agreed upon in 2019 (European Commission, 2019a).

All new regulatory changes on the EU level that affect the audiovisual industries are part of the wider Digital Single Market (DSM) initiative by the EU. As Andrus Ansip, EC commissioner for the Digital Single Market, stated: “The aim of the digital single market is to tear down regulatory walls and finally move from 28 national markets to a single one” (European Commission, 2015). Though the idea behind the DSM is to achieve pan-European prosperity, the proposed actions have not come without controversy. For instance, criticism has been levied against the apparent failure to balance economic and cultural interests. Due to the close connection between audiovisual content and culture, such concerns have been especially obvious with respect to EU audiovisual policy. The fear is that the new “borderless” rules will result in the disruption of traditional European markets for audiovisual content, as well as potential damage to the sustainability of audiovisual markets that are important for national cultures, especially in small countries (O'Brien, 2016; Newbiggin 2014). Audiovisual producers and distributors, in particular, have expressed concerns over the loss of licensing territoriality, which has served as the foundation of their value and pricing schemes (O'Brien, 2016). A report by Oxera (2016) refers to several key mechanisms that underpin the market systems and provide the basis for stakeholders to derive revenues, ones that would be endangered by EU actions related to copyright and cross-border access to content.

[As Michalis \(2016\) suggests, liberalization measures, unlike harmonization measures, are less complicated and lengthy in their decision-reaching process, compared to decisions regarding the approximation of national rules, i.e. harmonization. Hence, European governance is more about liberalization than harmonization. The EC plays a special role as its focuses mainly on the establishment of the internal market, or digital single market. The European Parliament and the Council of Europe, on the other hand, have paid more attention on the cultural dimension \(Iosifidis and Wheeler, 2016\). The aim to break down market barriers to facilitate transborder activities reveals that the primarily rationale behind the EC's polisci is the economic imperative. Scholars the quotas requiring braodcastes to devote the majority of their programming to European works has been argued to be of mere symbolic provision \(Iosifidis and Wheeler, 2016; Michalis, 2016\).](#)

Given that the economic and competition objective have been prioritized in the EC policies, it may be surprising that the EC's policies have met with open critics and concerns by stakeholders in the industry. The special characteristics of the audiovisual industries in which players work on business models that depend on the territoriality of copyright, that most prominently conflict with the EC's vision of an internal, borderless European audiovisual market. As such, some industry stakeholders, notably those in production, often favor a more interventionist approach, while others, such as broadcasters and advertisers, have been more in favor of a liberal approach.

Aware of the concerns of the audiovisual industry, the EC has communicated widely about the regulatory changes, and emphasized the promised benefits for its industry stakeholders. Without going into details about regulatory changes, we present the results of our project, which aims to explore whether the mentioned and promised benefits for the audiovisual industry in the EC documentations reflect the values and needs of audiovisual industry players. That is, we aim to understand whether European audiovisual policy is aligned to one of its main stakeholders.

## ***2.2 Achieving Policy Alignment***

This chapter looks at EU policy alignment with its audiovisual industry stakeholders. Doing this, it aims at understanding whether the policies match the stakeholders' values, needs, and priorities. When misalignment occurs, policies do not ostensibly support industry stakeholders, and conflict and destabilization are often the result. Furthermore, it can be suggested that, when policies do not match industry stakeholders' interests, these policies are less likely to be effective.

To study policy alignment in terms of how audiovisual policies on the EU level are aligned with audiovisual industry players in Estonia, we effectively conduct a stakeholder analysis. A stakeholder is anyone who has an interest in policy issues and their outcomes. This may include consumers and media firms, as much as national and transnational governmental bodies such as the EC (Van den Bulck, 2012; Van den Bulck & Donders, 2014). Policy alignment, therefore, can only be understood through a stakeholder analysis in which the respective arguments and logics of the involved shareholders are studied for their values, needs, and priorities.

Policy alignment is oftentimes an elusive goal. As Pauwels (2014) writes: "EU intervention is too economically inspired for some, not ambitious enough for others. The audiovisual sector has been, and still is, accompanied by different arguments and rationales." Indeed, EU intervention in audiovisual industries is fraught with disagreement and conflicts— among member states, audiovisual industry players, and

ultimately consumers. [Some industry players, notably those in production, often favor a more interventionist approach, while others, such as broadcasters, have been more in favor of a liberal approach.](#)

A literature review shows that the term, “alignment,” is seldom invoked in texts examining the relationship between policy and stakeholders, let alone that between audiovisual policy and its stakeholders. In fact, the total body of research in this context is seemingly limited. Among the texts on policy alignment, Freitas and Von Tunzelmann (2008) examine alignment of policy initiatives designed and implemented by different policy-making levels. Cantner and Pyka (2001) focus on the alignment and misalignment of policy design and policy-making. We see this apparent absence of the term, “policy alignment,” especially in the context of audiovisual policy-making, as an opportunity for exploration into an important issue in policy research. With this chapter, we aspire to situate the concept of policy alignment firmly in the space where policy and stakeholders interact.

Achieving policy alignment with stakeholders begins with the policy-development process, which is usually a process involving many sub-processes of discussions and debates (Hogwood & Gunn, 1984). Policy development usually takes place in a complex system of public-private interaction of actors and institutions cooperating to achieve policies deemed equitable to all affected stakeholders (Kingdon, 1984). Through consultation rounds, the EC opens up the policy-making process to input from a range of policy actors and stakeholders (Van den Bulck & Donders, 2014). Policy-making is rarely a straightforward process, but rather an endeavor in which different political preferences are celebrated, contested, or compromised (Freedman, 2008). As Freedman (2008, p. 3) points out, policy-making is far from “the mechanical or administrative picture that is often painted, wherein faceless civil servants draft legislations on advise of ‘experts’ and ‘scientists’ in the interest of the ‘public.’” The struggle between positions and priorities starts with the definition of the policy problem and continues with the formulation and selection of the policy solutions (Freedman, 2008).

Creating awareness and understanding of policy solutions under discussion is very crucial in the effort to achieve policy alignment. If affected stakeholders are to understand policy initiatives, then it is incumbent upon policymakers to adequately and successfully inform these constituents. The EU, the EC in particular, communicates widely about its policies, policy goals, and developments through documents available through its website and its social media.

In terms of achieving policy alignment, media policymaking is especially complex because the media functions simultaneously in economic, political, and cultural terrains. As a result, there is often dialectic between policies for the protection and benefits of audiences and cultures versus policies for the

protection and benefits of media providers. Regarding the latter, this manifests in issues such as property rights, markets, privatization, and contracts. The former covers issues such as public sphere, citizenship, and cultural diversity (Freedman, 2008). In finding policy solutions, compromises are often made that consider the various contradictions inherent to wanting to achieve both protection and openness, as well as competition and social cohesion (Hamelink & Nordenstreng, 2007). As Garnham (1998, p. 210) states, media policymaking “can never be the tidy creation of ideal solutions. Compromises and trade-offs are endemic.” As Van den Bulck and Donders (2014) find, there is an extensive literature on the specifics of EU media policies and their impact on member states, while there is not much work on the actual process of EU media policy-making as such. Ibrus’ (2016) report on Estonia’s inner struggles in forming its own position with regard to policy developments on the European level serves as an exception.

### ***2.3 Estonia in the Context of the EU Audiovisual Policy***

European audiovisual policy-making processes involve multiple stakeholders and actors, including representatives of individual member states (Donders, Loisen, & Pauwels, 2014; Van Cuilenburg & McQuail, 2003). Yet, it is too simple to discuss EU audiovisual policy in terms of EU versus State. Even on the level of individual states, opinions are usually shaped through various actors who fight for their positions, as Ibrus (2016) describes for Estonia. Due to the media’s connection to culture and language, however, much of the media providers operate within the boundaries of national markets. As they face similar conditions in terms of domestic market size, infrastructure, competition, and national regulations, it is the national discourse and setting that shape not only their opportunities and challenges but also their views on EU policies and policy reforms. In this chapter, we take a closer look at Estonia and its audiovisual service providers. With audiovisual service provider, or audiovisual industry stakeholders, we refer to firms that are involved in the production and distribution of audiovisual content for TV, cinemas, and video-on-demand distribution.

With 1.3 million inhabitants, Estonia is a small country in the EU. The fact that it was incorporated into the Soviet Union for 45 years brought about the development of two language communities. Today, 25 percent of the population consists of ethnic Russians who have Russian as their mother tongue (Statistics Estonia, 2017). With around 350,000 people, the Russian-speaking minority in Estonia represent a very small target market within Estonia. In fact, it was not until 2015 that a TV channel, the public channel ETV+, was launched to target the Russian-speaking minority in Estonia. Yet, the channel struggles to connect with its target audience, which continues to consume TV redirected from Russia (Kantar Emor,

2019; Tiikmaa, 2016). Due to polarized audiences and the relatively small number of Russian-speaking audience members, the audiovisual players in Estonia, by and large, target Estonian-language speakers (Jõesaar, 2015).

Operating in a small domestic market, Estonian audiovisual providers are faced with special economic dynamics that are typical for small markets. In small markets, media firms do not enjoy the same cost-saving opportunities through economies of scale and scope as do media firms in larger countries. Furthermore, they do not have the same opportunity to benefit from network effects. They generally operate under conditions of smaller financial resources, as well as with a comparatively smaller pool of human resources. In addition, market size limits the number of competing firms, which implies higher levels of media ownership concentration.

A number of works draw attention to the special characteristics of media markets in small states (Lowe, Berg, & Nissen, 2011; Puppis, 2009; Trappel, 2014). It is the common understanding that domestic market size matters both for the opportunities of media firms and for the expected results of media policy (Lowe et al., 2011). As Trappel (2014, p. 240) writes: “The underlying assumption of small state’s media research is that this group of countries shares problems, which are different from those in larger states, and that media policies somehow do not take these differences sufficiently into account.” ~~In fact, country size is not a guiding principle in European media policy, and all policies apply in equal terms to all countries.~~

Understanding the effects of media policies on audiovisual industries in small countries is important, given that small states represent 70 percent of the EU (Trappel, 2014). As European audiovisual policies largely focus on breaking down market barriers within the EU, they may favor media firms that enjoy a large domestic market, which allows them to both build on comparatively larger financial and creative resources and to enjoy a more favorable cost structure for achieving international competitiveness. At the same time, however, content producers and distributors in small markets may benefit from Internet-based technology and communication flows that help them to overcome small-state constraints by employing long-tail economies <sup>1</sup>(Anderson, 2008). Understanding EU policy from a small country’s perspective is also important, as a small state’s media systems are more vulnerable to and dependent on decisions that are taken elsewhere (Trappel, 2014).

~~As Ibrus (2016) describes, Estonia’s official position with regard to European audiovisual policy is the result of complex processes involving three main national agencies. The Ministry of Culture is involved~~

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<sup>1</sup>Where long-tail economies exist, companies can garner a high cumulative market share or a significant profit through a high number of low sale and distribution volumes (Anderson, 2008).

~~in discussions on European audiovisual policy based on cultural policy rationales, and the Ministry of Economic Affairs and Communication is involved in these discussions based on technical and economic rationales. The Ministry of Economic Affairs and Communication is also the Estonian responsible agent for the DSM initiative, of which the revised AVMSD is a part. In addition to these two ministries, the Prime Minister's Office, the so-called Government Office, coordinates Estonia's actions and strategies in relation to EU affairs (Ibrus, 2016).~~

In general, there are two conflicting positions towards European audiovisual policies in Estonia with regard to the creation of a single European market (Ibrus, 2016). While some value better cross-border access to online services and content, others worry about media concentration and the dominance of global players that may undermine Estonia's national media. Despite being a small market within Europe, Estonia's official position in the EU does not resemble a call for more "protectionism" in the international context. As Ibrus (2016, p. 25) points out, the "rhetoric of 'protecting' Europe's cultural diversity is usually avoided if not critically approached by Estonia's representatives of digital affairs."

In fact, when Estonia, which has been referred to as the "digital leader of Europe" (Forbes, 2017), had the helm of the Presidency of the Council of the European Union in 2017, its priority was to give a strong push towards creating a digital Europe and to start working on the free movement of data across the member states. Estonia's ideology is characterized by a high value on Internet freedom, a fertile start-up culture, the global free trade of goods and services, and general market liberalization (Ibrus, 2016). In terms of EU policy, Estonia has developed a neo-liberal approach, not the least because, between 2005 and 2016, it was the neo-liberal Reform Party who appointed Prime Ministers. In addition, former Prime Minister Andrus Ansip, who served as the European Commissioner for the Digital Single Market, is a member of the Reform Party. As Ibrus (2016) points out, Estonia's official position has been to support Ansip in facilitating the Digital Single Market.

The market-driven and explicitly neo-liberal rhetoric that dominates both Estonia's domestic consultations and its official position on the EU level in terms of its audiovisual policy reflects a missing tradition of defending the interests of the national media industry among Estonian policymakers and politicians, according to Ibrus (2016). ~~He~~ [According to him, this can be explained s this](#) with the small size of the [Estonian](#) media industry, which has little growth potential due to the small domestic demand and the limited exportability of Estonian content. [As a result, the above mentioned producers' needs for a more interventionist approach as their business models depend on the territoriality of their copyrights is likely to be less influential. As a result](#) ~~As such, as Ibrus (2016), he~~ argues, the focus of Estonia in terms of EU

audiovisual policy has been on enabling Estonian audiences access to content and services provided in other countries. [In the light of the liberal of EC, we, therefore, hypothesize that Estonian audiovisual stakeholders will support the European audiovisual policies because there is an alignment between their preferences and the EC's. Again, this stands in contrast to other accounts \(such as Puppis 2009\) who suggest a protective and more-interventionist approach in other small countries.](#)

### **3. Research Project**

While Ibrus (2016) studied the formation of the official position of Estonian policymakers towards the European audiovisual policies, this chapter studies how the needs, values, and priorities of Estonian industry stakeholders align with the European audiovisual policies—especially in the context of current policy reforms and revisions. [As such, our research applies a case study, which is a very important methodological approach commonly used in policy research \(Broughton Micova, 2019\). The case study allows us to the phenomenon of policy alignment within one country \(Swanborn 2010; Yin 2014\) through the use of a range of methods. In our mixed method approach, we ~~In order to research policy alignment, we~~ undertook two empirical steps as part of a stakeholder analysis. In the first step, we studied communications by the EC in terms of the benefits of EU audiovisual policies that it promises to national audiovisual industry stakeholders. In the second step, we studied the opinions of Estonian audiovisual industry representatives with respect to these promised benefits. ~~Since the revisions of the AVMSD and the copyright reforms have not been without criticism and heated debate, especially among audiovisual industry players, the EC's public communications have clearly put an emphasis not only on informing industry stakeholders about proposed and decided changes but also on putting their regulations and strategies in a positive light. The aim has been to convince skeptical audiovisual industry stakeholders that EU policies do offer benefits that align with their values and interests.~~](#)

#### **3.1 Methods**

##### **3.1.1 Document Analysis**

In our first empirical step, we analyzed the communications by the EC regarding European audiovisual policy that were available online in Autumn 2018. Following a navigation sequence on the EC's website originating with the page on the DSM, we followed links to more specific pages including the AVMSD, content distribution, and copyright, as we saw that these were connected to the audiovisual industry issues. Furthermore, we examined pages related to European Commissioner Andrus Ansip and followed links to

mission letters and hearings, announcements, and blogs. From these various sites, we identified 49 documents (here forward referred to as “EC texts”) that discussed European audiovisual policy in the context of the Digital Single Market initiative. In these documents, we identified 36 node categories that included words, terms, and/or phrases related to audiovisual media services. From these 36 nodes, we extracted 18 benefits of EU audiovisual policy for the audiovisual industry that the EC and Ansip mention in the documents.

We then tabulated the numbers of mentions of each of these benefits, as we saw these as an indication of the importance that the EC puts on each of these benefits. The nodes were created from the coding process using the concept of *categorical distinctions*. According to Krippendorf (2004 p.105), this method “defines units by their membership in a class or category – by their having something in common.” He states further: “Content analysts define symbols (usually single words) by their denotations, but categorize them according to the values, attributes, and qualifications associated with them.” For our research, these categories were formed based on the researcher’s knowledge and experience in analyzing audiovisual industries and policies. For example, culture and economy are major priorities of the EC AVMSD, as well as European Union policy, in general, and the stakeholders it governs. The same can be said for consumer interests and audiovisual industry priorities, which are indicated by terms such as “portability” (consumer) and “business model” (industry) found in the texts. Therefore, they constitute important categories for our research and were assigned nodes in the software NVivo.1VO.

### 3.1.2 Online Survey

In the second step, we conducted an online survey with representatives of the Estonian audiovisual industry in December 2018. We created the survey with the online survey development software Survey Monkey. In this survey, we asked respondents to evaluate each of the 18 benefits extracted from EC texts. The four category questions for each proposed benefit were: 1) Is it good for the audiovisual industry in general?; 2) Is it good for their individual professional interests?; 3) Did they think a policy revision was needed to achieve this particular benefit?; and 4) Did they think that an EU policy would be effective in achieving this benefit? We also added a hypothetical policy benefit that was not explicitly mentioned in the EC texts: the benefit of protecting and supporting small and peripheral markets. For each of these benefits, respondents provided answers in all question categories by scoring on a 1-5 point Likert scale.

To build a dataset of the Estonian audiovisual industry, we utilized an industry list from the Estonian registry that contained professional information and the contact emails of all registered firms in

the audiovisual sector. We sent the survey to each of the 228 firms on that list. Since the response rate was only 13 percent, we additionally collected responses through promoting the survey via social media, including groups related to the Estonian Film Institute; the Baltic Film, Media, Arts and Communication School; and our own personal contacts in the audiovisual industry. We received 86 valid responses in total, which included respondents representing and working for a range of firms in the area of TV and film. These included, above all, film and TV production firms, broadcasters, and distributors. The professional roles the respondents identified with included, above all, producers, scriptwriters, directors, and sales representatives. Due to the very small number of total responses, we did not analyze the respondent's survey responses by considering their professional field. We analyzed the responses with the help of the statistical analysis platform Jamovi.

#### **4. Results**

##### ***4.1 Document Analysis Results***

As mentioned above, a familiar dialectic in media policy refers to the tension between priorities related to culture and economics. Our research showed that, of the 36 node categories of topics identified in the coding process, 35 were related to economics, while just one addressed cultural issues. Another dialectic in European audiovisual policy is consumer access vs. industry development. Out of the 36 nodes we identified, only 15 nodes related to consumer interests. Yet, the node with the largest number of mentions, "portability," was consumer-related. Indeed, six of the top ten mentioned nodes were related to consumer interests. Hence, a mixed-result picture emerges from the tabulation of nodes—one in which neither consumers nor audiovisual industry stakeholders are revealed as the dominant target.

Table 1 lists the 18 benefits that we identified in the EC texts, along with the number of mentions in the studied documents. For our further investigation through the online survey, we added one hypothetical benefit that the EC did not mention: the benefit of "Protecting and supporting small and peripheral markets." In the subsequent online survey, we asked respondents about their opinions with regard to the 18 promised benefits and the one hypothetical benefit of EU audiovisual policy.

Table 1: Promised Benefits of EU AVMSD reform according to EC Texts

<i>Benefit</i>	<i>Number of mentions</i>
Protect and support creation of European works	31
Create fair and competitive markets	25
Facilitate licensing	24
Increase online viewers and subscribers	20
Stimulate investment in business development	18
Improve the AV business environment	18
Require on-demand service providers to pay levies	17
Protect and support European cultural diversity	17
Stimulate creation of AV content	17
Harmonize contract rights	15
Support development of innovation	15
Benefit both consumers and industry	13
Protect compensation for rightsholders	11
Control uses of protected content	11
Reduce compliance costs	7
Protect and support small enterprises	6
Promote discoverability of content	5
Challenge position of traditional players	2

## 4.2 Online Survey Results

### 4.2.1 Comparison of Mean Values Across Benefits and Question Categories

In our results, the mean values for all questions on the 18 benefits promised by the EC proposed reforms scored above the midpoint 3 (see Table 2). Therefore, we can surmise that there is a positive overall alignment between the EC texts and the Estonian audiovisual industry survey respondents. The mean scores for individual benefits across all four questions ranged from 3.12 to 4.56, a result that could be seen as positive. In addition, category mean scores computed for each question were 4.26 (Good for the Industry); 4.13 (Good for Individuals); 3.93 (Reform is Needed); and 3.36 (Reform will be Effective). Though these results indicate a general alignment of EC texts with audiovisual survey respondents, it also shows that respondents agreed most with the EC that the promised benefits were important for the audiovisual sector, while they agreed least that EU policies would be effective in providing these benefits. The pattern across the different questions was the same for the hypothetical benefit, “Protect and support small and peripheral markets,” which was not mentioned in the EC text. An exception to the general view of these category results were the scores for “Reduce compliance costs” and “Challenge position of traditional players,” for which respondents valued “Good for Me” (4.47 and 4.18, respectively) slightly higher than “Good for the Industry” (4.44 and 4.14).

Table 2 also shows that, if we take “Good for the Industry,” “Good for Me,” and “Reform Needed” as a three-item measure, the three benefits for which respondents feel the strongest about are: “Reduce compliance costs” (4.38), “Increase online viewers and subscribers” (4.36), and “Improve the AV business environment” (4.32).

Table 2: Number of Mentions in EC texts and Means of Survey Responses (n=34)

Proposed Benefit (mentions in EU texts in parentheses)	Good for the Industry		Good for Me		Needed Reform		Combined	Will be Effective	
	mean	std dev	mean	std dev	mean	std dev		mean	std dev
(31) Protect and support creation of European works	4.18	.968	4.09	.900	3.88	1.01	4.05	3.24	.987
(25) Create fair and competitive markets	4.38	.739	4.00	.953	4.00	1.04	4.13	3.29	.836
(24) Facilitate licensing	4.32	1.01	4.24	1.07	3.94	1.18	4.16	3.22	1.15
(20) Increase online viewers and subscribers	4.44	.746	4.44	.786	4.21	.946	4.36	3.38	.888
(18) Stimulate investment in business development	4.32	.843	4.15	.857	3.74	.994	4.07	3.21	.845
(18) Improve the AV business environment	4.56	.660	4.38	.817	4.03	1.00	4.32	3.32	.878
(17) Require on-demand service providers to pay levies	4.03	1.06	4.00	1.04	3.94	1.07	3.99	3.50	1.08
(17) Protect and support European cultural diversity	4.44	.894	4.12	.977	3.97	1.14	4.17	3.26	.932
(17) Stimulate creation of AV content	4.41	.821	4.26	.994	3.97	1.03	4.21	3.26	.931
(15) Harmonize contract rights	3.91	.933	3.85	.892	3.82	1.03	3.86	3.47	.861
(15) Support development of innovation	4.03	1.03	3.88	1.04	3.74	.994	3.88	3.12	.808
(13) Benefit both consumers and industry	3.88	.946	3.79	.946	3.71	.906	3.79	3.41	.743
(11) Protect compensation for rightsholders	4.41	.783	4.26	.828	4.09	.900	4.25	3.53	.896
(11) Control uses of protected content	4.21	.946	3.97	1.09	3.94	1.04	4.04	3.47	.961
(7) Reduce compliance costs	4.44	.927	4.47	.788	4.24	.923	4.38	3.59	1.02
(6) Protect and support small enterprises	4.12	.946	4.03	.834	3.74	.963	3.96	3.26	.790
(5) Promote discoverability of content	4.38	.739	4.15	.702	3.94	.919	4.15	3.41	.892
(2) Challenge position of traditional players	4.14	.958	4.18	.904	3.91	.996	4.07	3.44	.960
Category Mean	4.26		4.13		3.93		4.10	3.36	
Cronbach's alpha	.910		.880		.946			.951	
(0) (hypothetical) Protect and support small & peripheral ma	4.32	.976	4.12	1.04	4.00	1.07	4.14	3.59	1.02

#### 4.2.2 Importance for the Audiovisual Sector in General vs. Importance for own Professional Interest

Asked whether the benefits as communicated by the EC represented important issues for the audiovisual industry in general, the respondents found the most important benefits to be “Improve the AV business environment,” followed by “Increase online viewers and subscribers,” “Protect and support European cultural diversity,” and “Reduce compliance costs.” The benefits that scored the lowest in terms of perceived importance for the audiovisual industry were “Benefit both consumers and industry,” followed by “Harmonize contract rights,” “Require on-demand service providers to pay levies,” and “Support development of innovation.”

Asked whether the benefits as communicated by the EC represented important issues for their own business, the respondents found the three most important benefits to be: “Reduce compliance costs,” “Increase online viewers and subscribers,” and “Require on-demand service providers to pay levies.” In contrast, the benefits of EU audiovisual policy that scored the lowest in terms of perceived importance for one’s own business were “Benefit both consumers and industry,” “Support development of innovation,” and “Control uses of protected content.”

For all but three benefits, the scores are higher for the industry, suggesting that respondents think that the benefits are generally more important for the sector at large than for them personally. The benefits “Challenge position of traditional players,” “Reduce compliance costs,” and “Increase online viewers and subscribers” serve as exceptions. The largest difference in scores between “Good for the Sector” and “Good

for Individuals” are in the following items: “Create fair and competitive markets,” “Protect and support European cultural diversity,” and “Control uses of protected content.”

#### **4.2.3 Policy Revision Needed vs. Policy Revision will be Effective**

Measuring the score differential between these categories also provides a useful frame for evaluating the policy. A clear result was that, for every single benefit tested, respondents agreed more with the statement that a policy reform was needed than with the statement that a policy would effective. Examining the category “Needed Reform,” the three benefits that scored the highest were “Reduce compliance costs,” “Increase online viewers and subscribers,” and “Protect compensation for rightsholders.” Asked if they agreed that a policy reform would be effective for achieving individual benefits, stakeholders scored the following three benefits the highest: “Reduce compliance costs,” “Protect compensation for rightsholders,” and “Require on-demand providers to pay levies.” With two of the top three rated benefits in each category, there is evidence that the Estonian survey respondents are in relative agreement with what the EC deems in need of reform versus the suggested, proposed reforms.

The three benefits for which respondents found the least need for a policy revision were “Benefit both consumers and industry,” “Support development of innovation,” and “Protect and support small enterprises.” In comparison, the policy benefits for which respondents saw that policy reform would be the least effective were “Support innovation,” “Stimulate investment,” and “Facilitate licensing.” Among these lowest scoring terms, the gap between the categories “Needed Reform” and “Will be Effective” was most noticeable for the term “Increase online viewers and subscribers” —which had the 2<sup>nd</sup> highest differential of means. Other terms with large differential included “Facilitate licensing” and “Support European cultural diversity.” Overall, the comparison of respondents’ scores for the categories “Needed Reform” versus “Will be Effective” presents a mixed picture of their views on whether the EC has accurately identified the important issues and proposed the right solutions.

#### **4.2.4 Number of Mentions by EC vs. Survey Respondents’ Valuations**

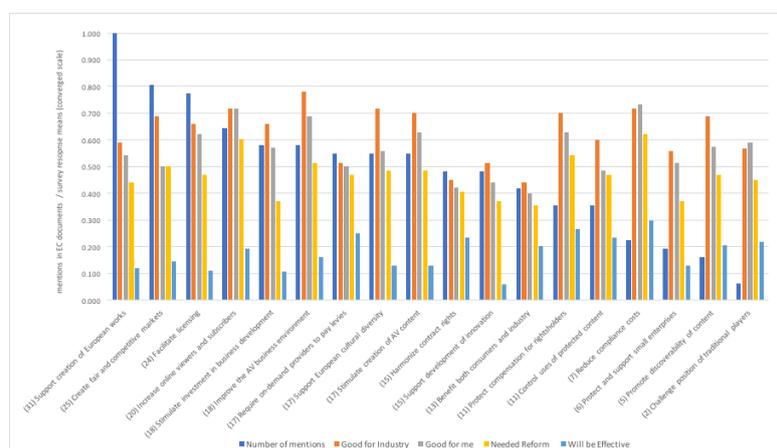
To facilitate the comparison of the number of mentions by the EC versus the respondents’ evaluations, we converted the results into a single scale for both sets of data (see Table 3).

Table 3: Values Conversion (n=34)

Proposed Benefit (frequency in EU texts in parentheses)	Good for the Industry		Good for Me		Needed Reform		Will be Effective		
	new scale	mean	new scale	mean	new scale	mean	new scale	mean	new scale
(31) Support creation of European works	1.0	4.18	591	4.09	542	3.88	.442	3.24	.120
(25) Create fair and competitive markets	.806	4.38	690	4.00	500	4.00	.500	3.29	.145
(24) Facilitate licensing	.774	4.32	659	4.24	621	3.94	.470	3.22	.110
(20) Increase online viewers and subscribers	.645	4.44	718	4.44	718	4.21	.604	3.38	.193
(18) Stimulate investment in business development	.580	4.32	659	4.15	570	3.74	.371	3.21	.107
(18) Improve the AV business environment	.580	4.56	782	4.38	690	4.03	.513	3.32	.161
(17) Require on-demand providers to pay levies	.548	4.03	513	4.00	500	3.94	.469	3.50	.250
(17) Support European cultural diversity	.548	4.44	718	4.12	560	3.97	.484	3.26	.130
(17) Stimulate creation of AV content	.548	4.41	702	4.26	630	3.97	.484	3.26	.130
(15) Harmonize contract rights	.483	3.91	451	3.85	421	3.82	.406	3.47	.234
(15) Support development of innovation	.483	4.03	513	3.88	442	3.74	.371	3.12	.059
(13) Benefit both consumers and industry	.419	3.88	441	3.79	399	3.71	.355	3.41	.202
(11) Protect compensation for rightholders	.354	4.41	702	4.26	628	4.09	.542	3.53	.265
(11) Control uses of protected content	.354	4.21	601	3.97	484	3.94	.469	3.47	.234
(7) Reduce compliance costs	.225	4.44	718	4.47	734	4.24	.621	3.59	.298
(6) Protect and support small enterprises	.193	4.12	560	4.03	513	3.74	.371	3.26	.130
(5) Promote discoverability of content	.161	4.38	690	4.15	574	3.94	.469	3.41	.205
(2) Challenge position of traditional players	.064	4.14	567	4.18	591	3.91	.451	3.44	.218

In the comparison of the number of mentions of each benefit as communicated by the EC versus the survey respondents' valuations, we see that, although the valuation stays around the same level for every benefit, the curve in terms of the number of mentions by the EC is sharp due to the sorting by descending value (see Graph 1). That is, those benefits that the EC mentioned only a few times were scored similarly high by respondents. Hence, respondents' scores from the survey show little correlation to number of mentions in EC texts.

Graph 1: Number of Mentions in EC Texts vs. Survey Respondents' Valuations (n=34)



#### 4.2.4 Policy Alignment and Small Market Needs

Whereas our hypothetical benefit “Protect and support small and peripheral markets” scored in the midrange of values for the benefit’s importance for the industry and one’s own business, as well as in terms

of a needed policy reform, it had the highest score (3.59) in terms of whether the policy would be effective. The other two benefits that can be seen as serving small market needs, i.e. “Protect and support creation of European works” and “Protect and support European cultural diversity” reached only the 10<sup>th</sup> (3.26) and 11<sup>th</sup> (3.24) highest score in terms of whether the policy would be effective. The benefit “Protect and support European cultural diversity” stands out a bit as it scored the second highest mean value in the category “Good for the industry.”

In addition, we added a summary question at the end of the survey, asking respondents to evaluate how well the needs of audiovisual players in small industries such as Estonia are considered in European audiovisual policy. On a Likert scale of 1-5, the mean score for all respondents was 3.24. With a midpoint of 3 indicating a “neutral” relationship between variables, this result can be seen as a positive relationship. However, it is also statistically a rather weak positive result; compared to the mean scores of all other questions on the survey, 3.24 is among the very lowest result.

#### **4.2.5 Selected detail results that deserve special mention**

In the light of the recent calls from policymakers and industry stakeholders alike for increased regulation and taxation of major online platforms, it may be surprising that the benefit “Require on-demand platforms to pay levies” was scored third lowest by the respondents in terms of importance for the audiovisual industry. At the same time, however, it scored the third highest in terms of whether regulations would be effective. For the term “Increase viewers and subscribers” —predictably a highly valued benefit to the industry—respondents saw a relatively high need for a policy change to achieve the benefit, as it also scored very high in “Needed Reform.” However, they did not exhibit confidence that such EU policy would be effective in doing so, as it finished with a very low score in “Will be Effective,” giving it the largest differential between those two categories. Also with regards to the business of the audiovisual media services industry, several other results deserve mention. For example, the promised benefit “Challenge position of traditional players” scored comparatively low across the first three categories, indicating a lack of importance to respondents—a result that is perhaps unexpected in a small peripheral market that often struggles to compete against larger rivals. Other industry business-related issues addressed by the EC, including “Reduce compliance costs,” “Create fair and competitive markets,” and “Stimulate investment in business development,” predictably scored well across most categories. “Improve the audiovisual business environment” had the highest score for the category “Good for the Industry,” which was also the highest

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score of all 77 questions on the survey. These business-friendly benefits suggest positive alignment between EC AVMSD reform and the business interests of these practitioners from the Estonian audiovisual media services industry. However, while respondents showed relative alignment with the EC for business issues, they were not convinced that all the policies would be effective. One notable result was for “Stimulate investment in business development,” a benefit of EC reform that respondents were quite skeptical of.

Furthermore, the survey responses seem to indicate some disconnect between the industry practitioners versus the audiences they serve, as evidenced by the term “Benefit both consumers and industry.” When asked about the categories “Good for the Industry,” “Good for Me,” and “Needed Reform,” the term was regarded with very low importance by respondents. Interestingly, the respondents scored it in the top third of important benefits in the “Will be Effective” category. This could reflect an aforementioned dialectic, revealed in the industry-related publications reacting to proposed AVMSD reforms, that contends that the changes are beneficial to consumers at the expense of the industry.

Referring to an often-debated dialectic in the priorities of EC media policy—that tension between support and protection for economics versus culture—one example from the research is worth noting. The term “Protect and create cultural diversity” tied for the second highest score in terms of importance for the industry, and in the midrange for other categories. A high score for culture is perhaps a rather unexpected result; in that the survey respondents are in the business of earning profits from the audiovisual industry, yet seem to recognize the value of culture and policies that support it.

For practitioners in the small market of Estonia, we expected the survey results show that size issues are important for the respondents. However, the results paint a mixed picture of importance, coupled with a somewhat surprising result for the potential efficacy of the reforms. The EC benefit “Protect and support small enterprises” scored in the middling range across all categories, generating a mixed result. Our hypothetical benefit “Protect and support small and peripheral markets” also scored near the category mean for the first three categories, generating a mixed result. The interesting and somewhat surprising result for this hypothetical came in the “Will be Effective” category, where it scored a higher value than those of all of the EC benefits offered. This rather surprising mismatch of mild importance for business with high confidence in potential efficacy suggests the need for further investigation.

Respondents’ evaluation of the importance of the benefits showed little correlation to the number of mentions of the same benefits in EC texts. The comparison between the consistently limited range of respondents’ evaluations (in means) versus the more extreme range of number of mentions by the EC documents shows that the different values that the EC attaches to each benefit, as measured by number of

mentions, do not match the values and priorities by industry stakeholders in Estonia. Furthermore, the three most-mentioned benefits in the EC text all scored low in respondents' evaluation of whether the benefit was important for the audiovisual industry in general. The category "Reform needed" showed the strongest alignment between EC texts and industry stakeholders, whereas the category "Reform will be effective" exhibited the weakest alignment.

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## 5. Discussion and Conclusion

An effective discussion section tells the reader what your study means and why it is important.

- **The major findings of your study**

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We found that Estonian stakeholders in the audiovisual industry...

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- **The meaning of those findings**

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The findings are interesting in two ways...

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- **How these findings relate to what others have done**

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There are also interesting in the context of previous writing on media regulation in small markets that see the policy approach in these markets as more leaning to the protectiviism and interventionists.

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- **An explanation for any surprising, unexpected, or inconclusive results**

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The results show that the stakeholders largely agree with the benefits of European policy in this field. But why? Go back to Ibrus (2016). Also the idea that Estonia is not strong in production export hence, territorialitz of copyrights as business model is not as important. Which has been one of the main criticism of the DSM initiative by the EC-

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We also introduce the Estonian case study as a small case as the small market policy is too focuse on western countries. In fact, our study of Estonia shows that it does compile to not interventionist as much wiring on small market regulations suggest. The small market that will not export but that opens up its

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boarders for foreign content reperesnts a more open approach in a country of former Soviet. As such it adds to the discussion that small markets cannot be über einen kamm scheren

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Do they agree on the relevance of these goals or do thez actuallz think this is being realized?

Surpring small number of respondents

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## 6. Conclusion

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Your conclusion should:

- Restate your hypothesis or research question
- Restate your major findings
- Tell the reader what contribution your study has made to the existing literature
- Limitations of your findings
- State future directions for research/recommendations

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In the context of changing European audiovisual policies and the communication efforts by the EC to achieve consensus with industry stakeholders, this chapter aims at understanding whether the benefits of EU audiovisual policy that the EC mentions in its communications match with what industry stakeholders in Estonia think is important for the audiovisual industry in general, for their own business, and whether they think that a revision is needed and would be effective for achieving these benefits.

Doing this, our paper puts forward a new understanding of policy alignment that we find neglected in previous research. Policy alignment, as we see it, exists where policies match to the values, needs, and priorities of their stakeholders. In the context of a lack of previous research on policy alignment, our chapter aspires to situate the concept of policy alignment firmly in policy research and, in particular, the discussion of European audiovisual policy-making.

Our paper also answers to another lack in previous research: Research on media policy in small markets has been very Western-focused. By applying Estonia as a case study, the results ... Based on previous work in Estonia (e.g. Ibrus 2016), the hypothesis was that audiovisual stakeholders would support EC policy. That the results show that industry stakeholders agree with liberal EC, and that there is a lack of protectionism and call for interventionist approach, that other research suggest for small markets, cannot be seen as one standardized group but call for a more differentiated approach.

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situate the concept of policy alignment firmly in policy research and, in particular, the discussion of European audiovisual policy-making.

Our research results are based on a mixed-method approach that included both the analysis of EC texts and of an online survey with representatives of the Estonian audiovisual industry. In total, we found that the EC promised 18 different benefits for European audiovisual industry players. For all of these, our survey respondents agreed that these benefits were more important for the general audiovisual industry than for their own professional interests. Furthermore, for almost all of these benefits, our respondents agreed that a policy revision was more needed in order to achieve these benefits than they did that a policy revision would be effective. The results for some of the benefits deserve special mention.

In the light of the recent calls from policymakers and industry stakeholders alike for increased regulation and taxation of major online platforms, it may be surprising that the benefit “Require on-demand platforms to pay levies” was scored third lowest by the respondents in terms of importance for the audiovisual industry. At the same time, however, it scored the third highest in terms of whether regulations would be effective. For the term “Increase viewers and subscribers”—predictably a highly valued benefit to the industry—respondents saw a relatively high need for a policy change to achieve the benefit, as it also scored very high in “Needed Reform.” However, they did not exhibit confidence that such EU policy would be effective in doing so, as it finished with a very low score in “Will be Effective,” giving it the largest differential between those two categories. Also with regards to the business of the audiovisual media services industry, several other results deserve mention. For example, the promised benefit “Challenge position of traditional players” scored comparatively low across the first three categories, indicating a lack of importance to respondents—a result that is perhaps unexpected in a small peripheral market that often struggles to compete against larger rivals. Other industry business-related issues addressed by the EC, including “Reduce compliance costs,” “Create fair and competitive markets,” and “Stimulate investment in business development,” predictably scored well across most categories. “Improve the audiovisual business environment” had the highest score for the category “Good for the Industry,” which was also the highest score of all 77 questions on the survey. These business-friendly benefits suggest positive alignment between EC AVMSD reform and the business interests of these practitioners from the Estonian audiovisual media services industry. However, while respondents showed relative alignment with the EC for business issues, they were not in full agreement that the EC would be effective. On the other hand, “Stimulate investment in audiovisual content creation” was scored highest in “Will be Effective.”

~~Referring to an often-debated dialectic in the priorities of EC media policy—that tension between support and protection for economies versus culture—one example from the research is worth noting. The term “Protect and create cultural diversity” tied for the second highest score in terms of importance for the industry, and in the midrange for other categories. A high score for culture is perhaps a rather unexpected result; in that the survey respondents are in the business of earning profits from the audiovisual industry, yet seem to recognize the value of culture and policies that support it.~~

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~~Our research has some limitations. First, our analysis underlies the assumption that the number of mentions of each benefit corresponds to the importance that the EC places on them. That is, we assume that the more often the EC mentions a certain benefit in its documents, the more important it finds it. This assumption may be disputable, especially considering that the documents by the EC that we chose for the analysis differ in terms of their nature, as they included website-posts, announcements, mission letters, hearings, and blogs. Despite the inconsistency of the nature of these documents, we find that the number of~~

mentions of benefits across all these documents may serve as an indicator for how important the EC finds these benefits.

Another limitation can be seen in the low response rate we received for the online survey. To our surprise, only 13 percent of the 228 contacts from the list of registered audiovisual firms in Estonia responded to our initial survey invitation. Through further spreading of the survey in social media, including groups related to the Estonian Film Institute; the Baltic Film, Media, Arts and Communication School; and our own personal contacts in the audiovisual industry, we eventually managed to receive responses from 86 people who work in the audiovisual industry in Estonia. As respondents could skip questions, not all respondents provided an answer to each Lickert Scale Statement. This meant, that the For each of the research questions, we received a minimum of 34 usable responses we received to each question was 34. At the same time, however, the ability to skip questions meant that respondents most likely did not opt to choose to evaluate mid on the Likert scale as an 'escape route' out of the questionnaire. This is important to mention as many respondents opt to choose the middle value on the Lickert Scale, though more on the positive side.

The low response rate could suggest limited awareness and knowledge of, as well as limited engagement with, EU audiovisual policy by industry stakeholders. Informal conversations with people working in the film and TV industry in Estonia enhanced this suggestion. As one of our conversation partners said:

*"I think, I am a well-informed person about what is going on in the industry here in Estonia. I go to all these conferences, also internationally. But do I really know what European policies for the audiovisual industry are? No. But, if even I don't know, then who knows?"*

A limited awareness of EU policy measurements among stakeholders might also be symptomatic for the replacement of government by governance (Iosifidis, 2016). European regulation as a model of governance (Michalis 2016) in which there is a fragmentation of authorities and power is shared among regulatory authorities, it is very difficult to know who decides what (Iosifidis 2016) and to follow up on the latest development.

While we acknowledge that our survey only led to a small dataset from which to draw conclusions, the Estonian sector is small by European standards. Also, the fact that the survey received a rather small number of respondents despite our large promotional efforts may indicate that those who filled out the survey are those who feel comfortable enough to answer questions about EU audiovisual policy. Informal

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talks with industry representatives in Estonia suggest that a repetition of the survey would reach the same respondents in the country. As such, we need to acknowledge that the survey responses may be representative for the cohort of practitioners that is aware of EU policies and not the total Estonian audiovisual industry. Yet, it is precisely this cohort that matters as its members can assess policy alignment.

A key result of our research project, therefore, is that the EC needs to better and more proactively communicate about its strategies and policies to its stakeholders. Also, while the EC clearly prioritizes some benefits over others, as measured by number of mentions, the industry practitioners seem to attach to all benefits a similar importance. The protection and support of small enterprises especially deserves more mention in EC documentation, judging by the importance that the industry practitioners attach to it. In addition, confidence in the potential efficacy of reforms, revealed by our hypothetical question, suggests the need for further investigation.

We see this chapter as an explorative study that puts forward the concept of policy alignment and that employs it to the context of Estonia, a small European market. This chapter is innovative, as it defines and attempts to measure policy alignment between policy-makers and industry representatives. Though we acknowledge some of the methodological challenges in our study, we suggest the further development of the study of policy alignment, especially through comparative research across different countries. [Thee studies should also take more qualitative work to make data interpretation more meaningful.](#)

[What do the findings to teach us that is relevant to take on board in future European audiovisual policy-making?](#)

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