

Participation as an organizational commitment in public service television^a

A participação como compromisso organizacional na TV pública

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ABSTRACT

The sustainability of public broadcasters remains uncertain. One of the ways in which society can act in this scenario is through mechanisms of participation at the management and editorial production levels, which helps to increase the visibility of their relevance for citizenship and the fulfilment of the right to communication and information. This article assessed, through documentary analysis, whether the concept and practice of public participation was or was not incorporated by Brazilian public broadcasters as an organizational commitment. The results show there is a lack of adherence to participation: only four out of 23 broadcasters apply it institutionally, and even then, just partially.

Keywords: Participation, public television, communication policies

RESUMO

A sustentabilidade das emissoras mantidas pelo poder público permanece incerta. Uma das formas de a sociedade intervir nesse cenário advém dos mecanismos de participação nas instâncias de gestão e produção editorial, o que poderia fortalecê-las ao ampliar a visibilidade de sua relevância para a cidadania e o atendimento do direito à comunicação e à informação. Este artigo verificou, por meio de análise documental, se a participação pública como princípio e prática foi ou não incorporada por emissoras públicas brasileiras como compromisso organizacional. Os resultados indicam escassa aderência à participação: somente quatro entre 23 emissoras efetivam-na institucionalmente, e ainda apenas de maneira parcial.

Palavras-chave: Participação, televisão pública, políticas de comunicação

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THE BRAZILIAN INSTITUTIONAL and political structure is characterized by distinctive arrangements in a number of fields, including the public broadcasting system. Article 223 of the 1988 Federal Constitution provides for greater complementarity between public, state, and commercial systems, yet public communication suffers from a lack of regulation to effectively provide this, an aspect that, as we shall see, is somewhat explored in the specialized literature.

In this scenario, TV Brasil, operated by the Brazil Communication Company (EBC), shares a space with state and municipal broadcasters, higher education institutions, and private law foundations, which includes other institutional configurations for the provision of educational broadcasting services. One of the weaknesses that they all tend to have in common is the uncertainty about their sustainability, which could be rooted in forms of public participation and social control—an aspect that has not yet been studied in literature.

This article contributes to the understanding of this context by presenting the results of our study, which, through documentary analysis, traced evidence of organizational commitment in state broadcasters and federal universities that are part of the public broadcasting system. We analyzed editorial documents and organizational guidelines of TV Brasil and the 22 state broadcasters. Our objective was to assess the possibility of increasing the current social participation formats in Brazil.

This article is divided into four sections. The first section describes relevant aspects of the development of public policies for the broadcasting sector in Brazil and the concept of participation. The second section describes the study methodology, the third presents and discusses the results and, lastly, the fourth section presents the final considerations, which summarize the contributions of this article.

PUBLIC POLICIES FOR BROADCASTING

In terms of public communication, broadcasting, from a theoretical point of view, presupposes the existence of social participation in different instances of production and management, including organizational and representational levels to elaborate public policies in the sector, according to how it was conceptualized in the redemocratization that followed after 1985 (Brandão, 2012; Duarte, 2011; Lima, 2015; Matos, 2009, 2012).

First, it should be noted that social participation agencies linked to public broadcasters are common in a number of countries. Councils, for example, may be

provided for by law or regulations, which, in turn, may nominate the entities that will constitute them or allow the public to vote for their members. As a rule, these agencies monitor TV programming to make sure it adheres to broadcasting principles. At an international level, there are other forms of participation, such as public hearing and consultation, mandatory publication of reports for external monitoring, and the creation of non-governmental enforcement agencies (Jakubowicz, 1998; Peranic, 2006; Pieranti, 2018; Spassov, 2010).

During Brazil's redemocratization period, the development of a new Federal Constitution was seen by many civil society entities as an opportunity to reduce the economic concentration in radio broadcasting and reverse the primacy it held in society. The constitution called this the private broadcasting system (Bolaño, 2007; Herz, 1991; Lima, 2015). The aim was to democratize communications by evaluating the criteria for broadcasting grants, which included measures to create and maintain social participation in broadcasters.

Nevertheless, clashes in the National Congress led to a model resulting from the lack of consensus in the subcommittee responsible for the topic (Bigliuzzi, 2007). As discussed in this section, the Federal Constitution assembled important provisions to transform broadcasting, however, these same provisions had a limited effect. On one hand, the complementarity between the three broadcasting systems (public, private, and state-owned) was recognized, the existence of monopolies and oligopolies in the sector was prohibited, and a new actor—the National Congress—was included in the process of providing grants. On the other hand, the establishment of a service that made annulments difficult and the lack of regulation of these issues helped to preserve, in practice, the model of grants that existed at the time. It is a format that began in the 1930s and was consolidated in the 1960s, when objective technical requirements were established and historically allowed political discretion over new grants, including the federal executive branch, as reported in several studies that go far beyond the scope of this article (Costa & Brener, 1997; Herz, 1991; Lima, 2015; Motter, 1994).

We need to recognize that, after the New Republic and even despite the lack of institutional mechanisms, radio space was significantly expanded for new non-commercial broadcasters. One of the reasons for this came from the political discretion for grants from educational broadcasters (Motter, 1994) and recent public policies for the universalization of services, giving rise to the National Plans of Licenses (PNO) (Pieranti, 2018). In addition, new technological possibilities allowed radio to advance beyond traditional broadcasting, including the ability to broadcast audio content over the Internet (Temer et al., 2019).



The right to communication and information, which is upheld by the Federal Constitution, helped forge the concept of a public broadcasting system that could strengthen citizenship. Preliminary drafts debated in the National Constituent Assembly presented advances, such as instituting a regulatory agency and including mechanisms to protect citizens. However, most of the literature considers that these advances ended up privileging “personal interests involved in issues that should be addressed ... from the perspective of collective interest” (Lima, 2015, p. 140).

The National Constituent Assembly represented a moment when “the emergence of civil society as a space for the struggle for public communication policies occurs ... in a more systematic way” (Kerbaux & Demarchi, 2017, p. 69). The performance of the National Front for Democratic Communication Policies (FNPDC) stands out in this process. Murilo César Ramos stated in an interview (Pieranti, 2019b) that the FNPDC, founded in 1984, was the result of actions and the convergence of universities, unions, intellectuals, congressmen from the Brazilian Democratic Movement (MDB), the National Federation of Journalists (FENAJ), the Association for the Promotion of Culture (APC), and the Brazilian Association of Educational and Cultural Public Broadcasters (ABEPEC).

Article 5 of the Constitution (referring to social communication) presents mechanisms that have the potential to democratize the sector, such as the aforementioned concept of three broadcasting systems—public, state, and private—which should adhere to the principle of complementarity. The characterization of each of these systems should have been ensured by the grant control, but its effectiveness was compromised by the absence of infra-constitutional regulation (Carvalho, 2009; Leal Filho, 2016).

“The effectiveness of the constitution depends much more on facts external to the text than any constituent assembly will ever admit” (Bigliuzzi, 2007, p. 60). Most advances proposed for communication policies in the 1988 Federal Constitution were not subject to subsequent regulation, in other words, this act took a long time and was weakened in practice. The Social Communication Council is representative of this.

This council is mentioned in Article 224 of the Constitution, and operates as an auxiliary body to the National Congress. Its composition, function, and implementation were established under Law No. 8,389 of December 30, 1991. There have been periods, however, where it was disabled and its composition does not reflect what was put forward in the preliminary draft (Lima, 2015).

A specific definition for the public broadcasting system was partially released 20 years later, under Law No. 11.652 of April 7, 2008. This law created the EBC, a process that involved debates with society and representatives from broadcasters and non-commercial pay-TV channels. The 1st National Forum for Public Television, organized by the Brazilian Ministry of Culture in 2016, created principles for building the public broadcasting system, which required broadcasting management and programming to be open to social participation (Buriti & Carvalho, 2012). These principles must “be understood within the scope of the achievement of social rights, resulting from the mobilization of civil society in the periods of redemocratization and post-redemocratization” (Paulino et al., 2016, p. 59). Law No. 11,652 sought to establish a forum for participation independent of government, with members of civil society as the majority, using the EBC Board of Trustees as a path to social participation and editorial autonomy.

Another relevant moment in the democratization of decisions on the sector policies established by the government was the 1st National Communication Conference (CONFECOM) in 2009, which approved more than 600 resolutions. The CONFECOM provided “public participation from a wide range of actors, including civil society, to create, implement, and monitor policies” (Kerbaux & Demarchi, 2017, p. 60).

However, hundreds of resolutions issued by the CONFECOM are still awaiting developments that depend on formal political institutions. Pieranti (2019a) showed that 163 resolutions were considered too generic to be objectively implemented. Out of the remaining 470 proposals, 65.74% were not implemented, 25.74% were partially implemented, and 8.52% were fully implemented.

The proposal to expand social participation in the EBC management and other public broadcasting stations (which is of particular interest in the context of this article) was not only abandoned, but also encountered some setbacks: “not only has the board model not been expanded ... the EBC Board of Trustees was extinguished by a provisional measure that was converted into Law No. 13,417 of March 1, 2017” (Pieranti, 2019a, p. 281).

Law No. 13,417 of March 1, 2017 extinguished the EBC Board of Trustees and some of its responsibilities while assigned other responsibilities to the board of directors and executive board. This shift was also accompanied by changes in the budget, which became insufficient for producing content that could meet the demands of citizenship: there was “a consistent picture of financial asphyxia with no public and stable plan to reverse it” (Pieranti, 2020, p. 15).



The fragile legal structure used to create the EBC has been addressed in the specialized literature. Murilo César Ramos considers that, in the beginning, the EBC was seen as a breakthrough, but also as a late and circumstantial response to the movements for democratizing communication (Lopes, 2013). The EBC did not change the historical aspect of the public television system in Brazil; it was not created to compete for advertising and public funds with commercial radio broadcasters (Bolaño & Brittos, 2016). Even if the EBC sectors wished to dispute resources from commercial retail advertising, they are unable to, as the very law that created the company prevents them from doing so.

Nevertheless, this legislation was a step forward for the Brazilian standard with regard to establishing a pool of financial resources. On an international level, this diversity is usually part of the survival model for public broadcasting, as it helps public broadcasters to avoid overdependence on an only source, which is always susceptible, in theory, to contingencies and the political climate. In European countries, for example, there is no legal uniformity, but it is common for public broadcasters to have resources for which public readers or listeners, the government budget, and commercial advertising pay the fees. In Brazil, the EBC counts on resources such as a direct budget from the federal government, the Contribution for the Promotion of Public Broadcasting (CFRP), funded by telecommunications service providers and broadcasting stations, and the possibility of broadcasting institutional advertising. Other state and municipal broadcasters, however, do not receive a specific contribution and their sustainability is constantly questioned (Holtz-Bacha, 2003; Mungiu-Pippidi, 2003; Open Society Institute, 2005; Pieranti, 2018; Wimmer, 2014; Woldt, 2010).

This scenario presents challenges to the existence of public broadcasters in Brazil, and having civil society monitoring their performance through appropriate participatory measures could theoretically increase the visibility of their contribution and strengthen the right to communication and information. This requires organizations to be committed to uphold the principle and practice of public participation.

For most public organizations, including companies that run broadcasting stations, the decentralization of the decision-making process can occur by open participatory processes, which facilitate the participation of other actors who are not always active in the political arena, such as social movements that “broaden the scope of the political and make participation more heterogeneous and multidirectional” (Carpentier, 2012, p. 169).

Carpentier et al. (2013) state that public broadcasting companies have the potential to broaden democratic participation in an “effort to politically establish democratic control and accountability in the media” (p. 291). To do this, however, they must implement practices that go beyond receiving the public’s contribution in the name of the interests of the organizations themselves. The processes must be evenly controlled by professionals and the public (Carpentier, 2011) so that “the actors involved in decision-making processes are positioned towards each other through power relationships that are ... egalitarian” (Carpentier, 2012, p. 164). Furthermore, participation should not occur on a periodical basis, but be adopted as an organizational commitment expressed in both editorial documents and a conduct of public transparency.

In the next section, we shall describe the methodology used to identify organizational commitment in the Brazilian public broadcasting system.

METHODOLOGY

We looked for evidence of organizational commitment to public television through a documentary analysis of sources from TV Brasil and 22 state broadcasters in operation during our data collection period (November to December 2018)¹, maintained by state governments or federal universities: TV Aldeia (AC), TV Cultura do Amazonas (AM), TVE Bahia (BA), TVC (CE), TV Educativa ES (ES), TV Brasil Central (GO), TV UFMA (MA), TV Universidade (MT), TVE Cultura MS (MS), Rede Minas (MG), TV Cultura do Pará (PA), TV Miramar (PB), TV Paraná Educativa (PR), TV Pernambuco (PE), TV Antares (PI), TVU RN (RN), TVU UFRGS (RS), TV UFRR (RR), TV UFSC (SC), TV Cultura (SP), TV Aperipê (SE), and TVE Tocantins (TO).

The units of analysis consisted of editorial documents, codes of conduct, and reports from the ombudsman and management councils of these stations, all of which are available on their respective institutional web pages.

The organizational commitment to participation was identified and assessed using the following analysis criteria, according to the presence or absence of information to the following six questions: (1) *expectations*: has the public been informed about their participation and what they should expect from it?; (2) *feedback*: does the broadcaster give feedback to the public about this participation?; (3) *access*: are participation mechanisms easy to find and use?; (4) *transparency*: does the broadcaster make public opinions visible?; (5) *professionalization*: do internal documents and editorial codes favor participation?; and (6) *utilization*: does the broadcaster make use of the public’s contribution?

¹ Data were collected at a time when federal and state government terms were coming to an end, as a rule, by the reduction of social participation in public broadcasters, which can be exemplified, for example, by the extinction of the EBC Board of Trustees. This reduction in social participation continued in subsequent governments and thus the data we collected show an inflection in the scope of public communication in Brazil that continues today (at the time this article was approved).



Compliance or non-compliance with these requirements were used to assess public broadcasting companies' organizational commitment to public participation, both in management and editorial production.

RESULTS AND DISCUSSION

Only four of the 22 broadcasters in our corpus had released information on forms of public participation in management and editorial production on their institutional web pages—TV Pernambuco; TV Brasil; Rede Minas; and TV Cultura (SP). TV Cultura do Amazonas did not have an institutional website at the time of our analysis. We were unable to find this kind of information on the institutional websites of the other 18 broadcasters.

We analyzed documents from the Pernambuco Communication Company (EPC), responsible for TVE Pernambuco, and found that social participation is one of this company's values and guiding principles of its organizational structure. Article 2 of its bylaws states a commitment to the "participation of civil society in controlling the application of the principles of the public broadcasting system, respecting the plurality of Brazilian society" (EPC, 2018b, p. 3). Its Business Plan 2019 and Long-Term Strategy 2018-2023 (EPC, 2018c) state that one of the company's goals is to "increase participation and social control in public communication" (p. 17).

A positive sign of commitment to participation by the EPC is visible in the way its board of directors is structured. It is composed of seven members, three of whom are "full representatives of civil society and their respective substitutes, chosen ... according to the plurality of professional experiences and representativeness of the cultural diversity of the state" (EPC, 2018b, p. 12). This company has 30 mandatory responsibilities, which include "performing its management duties of monitoring and strategic direction" (p. 16) and approving accountability reports.

The EPC Board of Directors manages *transparency* through its selection process and meeting minutes. A public notice is published for the selection process of civil society members. Each stage of this selection process, including the final result, is published on the broadcaster's institutional website. After analyzing the meeting minutes for the board of directors (available online), we observed that all members of the board have equal space for proposing agendas.

The EPC is not lacking ideals that may result in instruments or instances of participation, however, during our data collection period, we did not come across any information on applications or the development of said ideals

beyond the existence of the board of directors. The Code of Conduct and Integrity establishes the “EPC commitments in exercising corporate governance” with the goal of “creating a proactive relationship with its stakeholders, partners, and customers, in a precise, correct, transparent, and timely manner” (EPC, 2018a, p. 4). This includes the “EPC commitment to its relationship with the community” by “maintaining permanent communication channels and dialogue with the community, establishing a relationship of respect for people and local cultures”. The “EPC commitment to its relationship with society, government, state, control bodies, and regulatory agencies” involves “maintaining permanent channels of communication and dialogue with the public in a transparent, respectful, and constructive way” (p. 13).

In addition, its bylaws provide relevant mechanisms. Article 28 determines that the company must have an ombudsman to “offer communication channels with viewers and radio listeners, assuring them the right to criticize and make suggestions about the content and programming” and “send a reasonable response to viewers and radio listeners” (EPC, 2018b, p. 28). However, there is no information on the operation of the ombudsman on the EPC’s institutional website, which is in line with its character of internal instance, according to Article 28, which assigns to the ombudsman the task of “writing a weekly internal bulletin with critics of the program for the period, to be forwarded to the Executive Board”. In other words, in principle, there is an instance capable of expanding social participation in management, but in practice, it was statutorily closed.

The analysis of TV Brasil documents, managed by the EBC, showed there were two mechanisms in operation during our data collection period: the *Journalism Manual* (EBC, 2013) and the ombudsman (EBC, 2008)².

The *Journalism Manual* prioritizes participatory journalism in its *collaborative agenda*, described as “another tool to qualify EBC’s journalism and embracing a focus on citizens. Special agendas are announced in advance so that the public can provide data and information, thus enhancing the quality of production” (EBC, 2013, p. 77).

However, this manual does not lay out the details for managing participation. Although the manual does meet the level of professionalization, there is no transparency management, such as information on expectations and access. We were unable to find any information in the reports on how public participation is achieved.

The EBC Ombudsman is a channel for public expression (<https://www.ebc.com.br/ouvidoria>). Its commitment to maintain open channels of dialogue

² As highlighted in the literature review for this article, the EBC Board of Trustees was one of the pillars of social participation in the company’s management (Pieranti, 2019a, 2020). It was extinguished by Provisional Measure no. 744 of September 1, 2016, and converted into Law no. 13,417 of March 1, 2017, which changed the EBC governance structure and was not available for data collection during the period of our study. This same law also replaced the Board of Trustees by the Editorial and Program Committee. Such committee had not yet been implemented by the time this article was completed.



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with society is listed in a number of institutional documents. Its obligations are also provided for in Article 79 of the bylaws: “the ombudsman should provide the necessary procedures for solving the problems raised and provide sufficient means for interested parties to follow up on the measures adopted” (EBC, 2018). The EBC Ombudsman inform the public about what they can expect regarding certain interactions. Its operation is detailed in a specific norm (EBC, 2008). Its regular reports (available on the website) publish feedback on how transparency is managed and how messages from the public are used. The literature on the achievements and limits of the EBC Ombudsman is growing, and Paulino and Silva (2013) and Coelho and Paulino (2020) are two specific examples.

Article 5 of the Rede Minas statute (Decree No. 47747/2019) provides a seat for “a citizen of unblemished reputation and outstanding performance in the cultural area” on its board of trustees. However, this position is appointed by the governor and tends to favor a political nomination and not necessarily one that represents society. There is also a seat for representatives of the Labor Union of Broadcasting and Television Companies from the state of Minas Gerais and higher education institutions from Minas Gerais that offer journalism courses. We did identify transparency management on part of the board by the fact that it publishes its decisions, however, the public access to the board was restricted. The board of Trustees is not directly responsible (Article 4 of the Bylaws) for public participation in management or programming.

Our analysis of the document suggests that the interaction in Rede Minas is expected to be explored within the scope of market positioning strategies. The department of the company responsible for serving the public and processing its eventual contributions is marketing and social communication management, which, according to Article 18 of the statute, provides for “the creation and maintenance of relationship channels between TV Minas and its public, as well as for analyzing and assessing satisfaction with the services offered to the public”. There is no provision that details the statutory application. The statute articles related to the journalism board (Article 20), newsroom management (Article 21), and content management (Article 22) do not mention any channels of public participation.

The TV Cultura (SP) Board of Trustees has seats for society representatives. The composition of the Board is laid out in its bylaws. There are 47 seats. The permanent members (non-elected), defined in Article 5, consist of the presidents of the National Union of Students (UNE) and the Brazilian Society

for the Progress of Science (SBPC), and the deans of state public universities, which include the Pontifical Catholic University (PUC) and the Mackenzie Presbyterian University (Father Anchieta Foundation [FPA], 2005). The 23 (elected) society representatives are “elected by absolute majority of the Board of Trustees, who must have untarnished reputations and are known for their dedication to education, culture, or other community interests” (Article 3). These representatives serve for a three-year term with partial annual renewal and re-election permitted. In addition, “only those candidates who have been nominated by at least eight elected or lifetime councilors may serve as representatives” (Article 3, Paragraph 2), which, despite of the diversity provided by the number of seats, may restrict participation.

Analyzing minute meetings allowed us to identify how suggestions made by councilors representing civil society are received. The TV Cultura Board of Trustees handles the access, transparency management, and utilization.

Editorial guidelines state that the content of TV Cultura is intended to be used as a space open for debate and mediation between different perspectives, but there are no practical strategies established to do so. According to the board of trustees’ guidelines for journalistic programming, the broadcaster “must present this diversity as a balanced, thoughtful mediator, equidistant from debaters in the civilized and democratic scope”. In this way, mediation must be “capable not only of identifying and giving space to socially relevant voices, but of ... providing information and analyzing and conducting debates in a clear and knowledgeable way” (FPA, 2017, pp. 2–3). In theory, social participation could be placed within this context, but the documents do not detail how this could be explored. Moreover, the document entitled *Fundamentals for the Elaboration of the Father Anchieta Foundation Strategic Action Plan* states that the foundation that manages TV Cultura “shares the principle of creating an informed, qualified, and participatory citizenship with democratic education and democratic press” (FPA, 2016, p. 18). This principle, however, does not appear to have any effect, at least on possible forms of social participation, as it relates to station management and programming. In short, considering the results of our analysis of four broadcasters, we identified three formats of organizational commitment to participation: society representation in management councils, ombudsmen, and principles of participatory journalism.

The TV Cultura Board of Trustees adopts a management format that meets (partially or fully) the six dimensions of participation defined in our methodology, while the EPC Board of Directors meets (partially or fully) four



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of the dimensions (Table 1). The Rede Minas Board of Trustees welcomes society participation, yet it is quite restricted, and the EBC extinguished a similar department in 2016, as previously mentioned.

Table 1
Dimensions of public participation met by public broadcasters

	TVE Pernambuco	TV Brasil	Rede Minas	TV Cultura (SP)
expectations	○	○	–	○
feedback	–	○	–	○
access	●	○	○	●
transparency	○	○	●	●
professionalization	●	●	○	●
utilization	–	○	–	●

Note: ● Fully meets; ○ Partially meets; – Does not meet.

As its operations are visible online, the EBC Ombudsman (TV Brasil) is a positive example of transparency management, access, and source of information for expectations, in addition to taking advantage of public interaction. Its existence is necessary in order to maintain an organizational structure that establishes an institutional commitment to participation. Communication sent via the ombudsman can have an impact on other company decisions, which can be recognized given the transparency of its operating channels.

TV Cultura and Rede Minas do not have specific ombudsman functions despite maintaining a communication and service channel. The TV Cultura channel’s website defines itself as a “participation and service channel”. TVE Pernambuco has an ombudsman responsible for generating newsletters that circulate internally.

Despite meeting the dimensions of participation, TV Cultura, due to its board of trustees, and TV Brasil, through its ombudsman, are hindered by their undefined forms of participatory journalism. Both have an institutional commitment to participation in journalism—TV Cultura for its participatory citizenship and TV Brasil for its collaborative—but they do not offer practical and specific norms for their application. Rede Minas and TVE Pernambuco do not even show any commitment to participatory journalism.

One potential impact we identified is one broadcaster adopting a mechanism based on the experience of another broadcaster. This was the case of TV Brasil and Rede Minas: one of the minute meetings from the Rede Minas Board of Trustees contained a proposal to implement its own ombudsman, following the EBC model.

What stood out the most to us about TV Brasil was its weak participatory practices. Even though its guidelines recognize the importance of social participation, the company underwent two changes that compromised its institutional commitment to participation and its very existence as a public broadcaster. The first change occurred with the extinction of the board of trustees in 2016 and the second when TV Brasil merged with the government channel NBR in 2019. Both changes may have occurred as a result of a weak national public broadcasting system, which is subject to government decisions that challenge and modify previous determinations. In December 2020, the group called *Frente em Defesa da EBC e da Comunicação Pública*, formed by several civil society entities, released the EBC Citizen Ombudsman. This initiative receives, analyzes, and processes the company's performance and publishes periodic reports³. However, given the lack of relevance of public broadcasters perceived by society in general (Brandão, 2012; Duarte, 2011; Lima, 2015; Matos, 2009, 2012), these changes did not generate much stir among the public.

National and international literature suggests that social participation is fundamental in public broadcasting management (Jakubowicz, 1998; Leal Filho, 2016; Spassov, 2010). The diversity of instruments and formats of participation has grown, making interactions richer and more complex, mainly due to technology (Carpentier, 2011, 2012; Carpentier et al., 2013). Nevertheless, we discovered some limitations in Brazil. Participation as an organizational commitment is stated in norms in only four of the 23 public broadcasters run by federal and state governments and federal universities. Even still, we found that these four broadcasters themselves could do more to greatly improve their commitment by expanding and creating more stable instances of participatory practices.

FINAL CONSIDERATIONS

We analyzed the organizational commitment to social participation in 23 Brazilian public television stations by analyzing editorial documents, codes of conduct, and reports on their institutional web pages. We identified

³The reports are available on the social network for the Front in Defense of the EBC and Public Communication (<https://www.facebook.com/emdefesadaEBC/>) and on a website dedicated to the memory of the extinct Board of Trustees (<https://conselhocurador.ciranda.net/>).



this commitment in only four of the 23 stations analyzed. We discovered there were three different types of commitment: ombudsmen, management councils, and principles of participatory journalism.

The development of internal management policies in public broadcasting in Brazil led to participatory experiences with meaningful proposals and results. But these were hard to achieve due to an adverse political scene. The fragility of the sector's regulation meant to meet the normative aspects of public communication would prove to be difficult.

We conclude that, in general, there is low adherence to participation as an organizational principle in public television stations. If we start from the premise that the public broadcasting system should meet the democratic demands that arise from social participation, we can consider that the system is at risk. With few and weak mechanisms of social participation, the existence of these broadcasters remains subject to the decisions of whichever government may be in power.

Even still, there are some experiences that stand out and can serve as a model for developing policies in this sector. We highlight the model of the EPC Board of Directors and the EBC Ombudsman as instances of organizational management and, to participatory journalism, the EBC and TV Cultura as instances of content production. It is worth remembering, however, that these references are restricted to a theoretical level, since the implementation of participatory journalism was not assessed in practice.

Even if they operate in an unfavorable scenario, public broadcasters occasionally provide inspiration for advancing democratic models of public communication. It is necessary that these exceptions become the rule so that a stable and democratic public system can be established. ■

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Participation as an organizational commitment in public service television

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