



Broadcast Regulation in Pakistan: The Need for an Enabling Regulatory Regime

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Since the liberalization of the broadcast sector in Pakistan in 2002, the media landscape in the country has entirely changed. From one state-run television channel to more than 71 satellite television channels and from one Radio Pakistan to more than 100 FM radio stations, the broadcast sector has increased exponentially over the past few years. The regulations were introduced with the aim of providing an enabling environment for the promotion of an independent and free media. The regulatory framework has managed to improve the choices of people with regards to news and current affairs. Nevertheless, the very objective of promoting independent and free media to foster a democratic society is not very visible. A variety of issues have been hampering the capacity of the regulatory body PEMRA to promote an enabling environment for the development of such media. This article is an attempt to highlight and explain the issues and problems faced by PEMRA. The article also aims at exploring various options to address the issues and problems in a just manner.


Introduction

The media has multiple roles in creating an informed citizenry, building public opinion and fostering democratic processes. It is thus essential for the development of a democratic society. An environment that can ensure independent and free media is pivotal. Such environment provides the opportunity for the media to inform and educate citizens, increase social interaction, and shape values suitable to democracy (Dahlgren 2006; Coronel 2003). Considering the significance and role of independent and free media in the promotion of a democratic society, the Government of Pakistan in 2002 decided to liberalize the airwaves of the country - and relinquish the state-monopoly - and introduced a regulatory framework to issue licenses for electronic media to the private sector. The Pakistan Electronic Media Regulatory Authority (PEMRA) was established for this purpose under the PEMRA Ordinance, 2002.

PEMRA has a broad range of objectives, including improving standards of information, education, and entertainment; enlarging people's choice of news and current affairs; improving access to mass media at the local and community level; and ensuring accountability, transparency and good governance. The central objective of PEMRA is to provide an enabling environment for the promotion of an independent and free media which is essential for the development of a democratic society. In order to materialize its objectives, PEMRA was authorized to issue licenses to the private sector for broadcast media - radio and satellite television - and distribution stations at international, national, provincial, and local level; and regulate the operation of the licensees.¹ Since its establishment in 2002 PEMRA has managed to issue licenses for more than 100 FM radio stations and 71 satellite television channels, as well as landing rights to 28 international satellite channels to reach audiences in Pakistan (Internews Pakistan 2009a, 2009b), and two licenses for each internet protocol TV (IPTV) and mobile TV. It is important to mention here that, prior to 2002, there were only the state-owned Pakistan Television (PTV) and the Pakistan Broadcasting Corporation (PBC) to 'inform, educate, and entertain' the people through the airwaves of the country.

During the past few years, PEMRA has managed to improve the choices of people with regards to news and current affairs. A large number of new radio and satellite television channels have appeared in the country and people can get information about events and incidents through various sources. Nevertheless, the very objective of promoting independent and free media to foster a democratic society is not very visible. A variety of issues have been hampering the capacity of the Authority to promote an enabling environment for the development of such media. These issues include, amongst others, autonomy and independence of the regulatory authority; regulatory deficits,

¹ For details please see the Pakistan Electronic Media Regulatory Authority Ordinance, 2002 available at: <http://pemra.gov.pk/pdf/ordinance1.pdf> [Accessed 22 February 2009].



particularly regarding media ownership and technological convergence; and weak enforcement mechanisms. These issues have impeded the capacity of the regulator to efficiently work out and effectively implement its plans. Critics have alleged that the space for media has grown by leaps and bounds; however, media freedom has shrunk for its practitioners (Rehmat & Jan 2005). PEMRA itself has acknowledged the gravity of the situation in various reports.


The above-mentioned list of issues is not exhaustive and there may be many other impediments in promoting an enabling regulatory environment for media. This would mean that the state of the regulatory regime for electronic media is not very promising. The situation requires a comprehensive study of the regulatory framework governing electronic media in Pakistan and issues affecting the ability of the regulator to promote an enabling environment. This paper is an attempt to highlight and explain the issues and problems faced by PEMRA. The paper also aims at exploring various options to address the issues and problems in a just manner. In order to comprehensively analyze the state of the regulatory regime, critical appraisal of the regulations is imperative.

The paper starts with an overview of broadcast media regulations with a focus on PEMRA. Major issues and challenges are explained in the next part, followed by an exploration of practical answers and resolutions. The conclusion provides a recap of the entire research, along with major recommendations.²

Broadcast Regulation in Pakistan

Liberalizing airwaves and relinquishing existing state-owned monopolies in the media have repeatedly been identified as major steps towards building an enabling environment for free media. Introducing regulatory regimes and issuance licenses to the private sector is essential for a competitive market and therefore a prerequisite for independent and free media. Although there is a strong realization that the press/media should be free from state control, the regulation of the broadcast sector can be justified for many reasons. Airwaves are a ‘public good’ and governments have a role in safeguarding the public good (Leonardi 2003). Moreover, ‘wireless communication’ necessitates governments’ authority over allocation and licensing of broadcasting frequencies (Leonardi 2003; Zuckman et al. 1988: 1-2). Beside the

² For the purpose of this paper, I have benefitted from the ‘Review and Analysis of the Legal Framework Governing the Media in Pakistan,’ commissioned by Internews Network-Pakistan and prepared by the Stanhope Centre. This report provides a comprehensive analysis of the legal framework governing Pakistani media. The report covers all the laws including constitutional provisions, which are either specific media laws or have some connection with the media. In addition, extensive use has been made of information available on the PEMRA website (www.pemra.gov.pk), PEMRA’ publications including its annual reports, PEMRA laws and rules and regulations, as well as www.internews.org.pk and www.intermedia.org.pk as resource centers for media in Pakistan. Besides, interviews with PEMRA officials, media practitioners, broadcasters and academics have been conducted for this purpose.



technological reasons and issue of public goods, media ownership is another core rationale for regulations, as society has a legitimate interest in placing limits on private broadcasting by preventing concentration in the media sector (Templeton 2000: 57-58).


Democracy and democratic institutions have been struggling in Pakistan due to the derailing of the democratic process by dictators throughout the short history of the country. Out of sixty two years of independence, more than half remained under dictators' rule. Limited sources of independent information and people's lack of access to mass media at the local and community level have played a major role in facilitating dictatorial regimes. Democracy and the democratic process have not been allowed to flourish in the country. The state of affairs can largely be attributed to the state-control of the airwaves and the absence of independent and free media to educate and inform the citizens.³ Since the inception of Pakistan, the use of airwaves was the sole prerogative of the state and the private sector was not allowed to operate radio stations or television channels. However, the government of Pakistan, under the Pervez Musharraf regime in 2002, decided to liberalize the airwaves of the country and introduced broadcast regulations in this regard. As a result, PEMRA was established in 2002 through an Ordinance. The establishment of the regulatory regime for electronic media can be treated as a huge milestone. Since its establishment, PEMRA has been busy issuing licenses for FM radio and satellite television channels to the private sector. The following paragraphs provide an overview of PEMRA and its jurisdiction, powers, and limitations.

The Pakistan Electronic Media Regulatory Authority (PEMRA)

The introduction of PEMRA was a unique venture for a developing country like Pakistan as no country in the region had similar regulatory arrangements to regulate broadcast media. The objectives of PEMRA include improving standards of information, education, and entertainment; enlarging the choice of people for news, current affairs, and music; improving access of people to mass media at the local and community level; and ensuring accountability, transparency and good governance by optimizing the free flow of information. Comprising of thirteen members including the chairman, PEMRA is mandated to issue licenses to the private sector for broadcast media and distribution stations at international, national, provincial, and local level. PEMRA is authorized to:

- i) issue licenses for broadcast media - radio and television;

³ Until 2002, the Radio Pakistan and Pakistan Television (PTV) were the only electronic media organizations operating in Pakistan. However, during the 1990s, Shalimar Television Network and FM 100 were allowed to operate as private entities in electronic media in the country.

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- ii) issue licenses for distribution systems - Cable TV, MMDS/LMDS, and Direct to Home (DTH) and
 - iii) regulate the establishment and operation of the licensees.

The advent of the regulatory regime in 2002 for private media in Pakistan, as discussed earlier, started a new era for the broadcast sector in the country. The regulations have opened new avenues of information, education and entertainment for the people of the country. Since its establishment in 2002; PEMRA has issued more than 100 FM radio station, 71 satellite television channels, and six MMDS licenses. PEMRA has granted landing rights to 28 international satellite channels to reach audiences in Pakistan. Moreover, two licenses for each IPTV and mobile TV have also been issued. The regulatory regime, in the beginning, was not in favour of cross media ownership; however, it was allowed in 2007 through an amendment in the PEMRA law. Besides, PEMRA does not have any jurisdiction to regulate Radio Pakistan and PTV - the state-run media.


In spite of the above, PEMRA is still struggling for its legitimacy, authority, and effectiveness. A variety of issues have been affecting the promotion of an enabling regulatory regime in the country. These issues include, but are not limited to, autonomy and independence of the regulatory authority; structure of the legal and regulatory framework; regulatory deficit - particularly with regards to media ownership and technological convergence; weaker and traditional enforcement mechanism; trust deficit between the licensees and PEMRA; ambiguity in government policies towards the regulator; and a lack of comprehensive research to develop a proactive approach in regulating the sector.

Regulatory Issues in the Broadcast Sector in Pakistan

A thorough observation of the regulatory regime reveals that the issues have intensively and extensively hampered the capacity of the regulator to efficiently work out and effectively implement its plans. Critics have alleged that the space for media has grown; however, media freedom has shrunk for its practitioners (Rehmat and Jan 2005). PEMRA itself has acknowledged the gravity of the situation in various documents including its second annual report.

Autonomy and independence of the regulator

Griffin and Price (2004: 5) argue that an independent and autonomous regulator without any control by the executive branch of government is desirable. However, in the case of Pakistan, independence and autonomy of the regulator is questionable as the PEMRA law authorises the Federal



Government to issue policy directives to PEMRA⁴. Unlike other utility regulatory authorities, which are mostly linked with the Cabinet division, the Government has linked PEMRA with the Ministry of Information and Broadcasting (MOI) in 2007 (Dawn 2007). The MOI exercises the power of the Federal government to issue directives. It is important to mention here that the Federal Secretary of Information is also a PEMRA board member⁵. This situation puts PEMRA under the complete control of MOI and its independence and autonomy remain subject to the directions of the government.

Structure of legal and regulatory framework

The regulatory and legal framework governing broadcast media is based on traditional and old practices of ‘policing’ rather than ‘persuading’ the media to abide by the regulations. A recent example of such policing was the disappearance of private media due to the imposition of a state of emergency by General Musharraf on November 03, 2007. As a result of this action of the then army chief, almost all private television and radio channels went off the air leaving the 160 million Pakistanis only with state-run PTV and Radio Pakistan for information and entertainment. Similar practices of policing the media are still being used to curb media freedom. The situation has led to a trust deficit between the licensees and PEMRA, and media operators have occasionally disregarded the orders of PEMRA.

Technological convergence and inadequate media regulations

Technological advancement has made it possible to use telecommunication networks for broadcasting and broadcasting networks to provide telecommunication services. ‘The world is in your hands’ as one can access internet, television, and telephone calls through the same handset. Moreover, the same gadget can be used for broadcasting and up-streaming audio and video at the same time. However, PEMRA does not seem to be ready to deal with emerging technological issues and challenges. The issue emerged as a serious one recently, when one cellular phone operator announced the launching of mobile TV (BBCUrdu.com 2007a). Ultimately, that company had to apply to PEMRA separately for such a license, despite the fact that the PEMRA Ordinance did not have specific provisions to grant such a license. In the future, the convergence of technology can pose similar regulatory problems which the current PEMRA law cannot adequately deal with (Alam 2006).

⁴ See Section 4 of the PEMRA Ordinance, 2002

⁵ See Section 6 of the PEMRA Ordinance, 2002.

Media Ownership and Regulatory Deficit

The government has lifted the ban on cross media ownership through the PEMRA (Amendment) Act, 2007. This has allowed print media tycoons to own electronic media outlets. As a result, the market is becoming an oligopoly. Due to mounting media ownership consolidation and concentration, diversity is in decline and new entrants are finding it difficult to compete with big market players. Though the combination of resources of print and electronic media, as Riaz argues, may increase quality in news and current affairs programmes, there is a fear that the permission can ‘result in a few large firms controlling the majority of information Pakistanis receive’ (2003: 14). This can, according to Riaz, also make it easy for the government to control the media through banning or adding advertising quotas to a ‘few operators’ in a small media market. Waning diversity of media ownership, consequently, will lead to fading pluralism and result in the control of a few players over the sources of people’s information. The situation is alarming for the semi-literate and illiterate public which mostly depends on electronic media for diversity of information. It is pertinent to mention here that PEMRA has yet to formulate new rules/regulations to monitor and regulate cross media ownership.

The enforcement of regulations against illegal operations

The lack of enforcing the PEMRA law against illegal radio stations is another serious issue for the broadcast sector. In tribal areas, these illegal FM radio stations are in abundance and they have been used to incite hatred and violence (BBCUrdu.com 2007b). Such illegal radio stations have much to do with the ongoing instability in the Swat region of North West Frontier Province (NWFP). Due to a variety of factors, including the absence of governmental writ in the areas, PEMRA is not able to enforce its powers to stop such operation. An effort is made by the provincial government of NWFP to bring illegal operations within the ambit of the law through entering into a peace deal with miscreants who illegally operate such radio stations.

The previous pages have provided a brief glimpse of the regulatory issues, currently faced by the regulatory regime in Pakistan. PEMRA as an autonomous, independent, efficient, and effective organization is highly pivotal for the promotion of independent and free media in the country. Such issues and challenges affect the capacity of the Authority to independently and effectively monitor and regulate the media. Therefore, it is important to explore the solution for such issues and develop an enabling environment for the media in Pakistan that ultimately helps building and strengthening democracy and democratic processes in the country. Monroe Price and Peter Krug (2002) have attempted to find the solution for such issues and provide a framework for an enabling environment for the media.

Need for an Enabling Regulatory Regime


The framework for an enabling environment as devised by Monroe Price and Peter Krug (2002) attempts to answer the questions relating to such issues which are being faced by media and its governing regulatory regime in Pakistan. The framework mainly focuses on the structure of media and the media market, the rule of law, the legal environment for news media activity, the role of civil society, and education about rights. The regulatory and legal environment relating to news and current affairs media is the main focus of the framework.

With regards to the structure of the media, Price's and Krug's framework provides three principal media forms. The first is state monopoly in ownership and control. The second is related to a public or public service monopoly. The third is private ownership, usually accompanied by some degree of state regulation. However, the framework requires a balanced approach between private and public service/sector media. A competitive market is seen as a requisite for an enabling environment. The framework acknowledges that restrictions on foreign ownership of media are necessary; however, it considers foreign voices as extremely important for transition countries and countries where there is a government monopoly or a narrow range of domestic points of view in the media. The framework perceives dominance of a single broadcaster/owner as a threat to minority voices and to opposition views within society. Moreover, it supports equal opportunities to all the voices in the media. Furthermore, the framework necessitates a favourable legal environment for news media operation.

In light of the principles of the framework for an enabling environment, as devised by Price and Krug, the broadcast media environment in Pakistan cannot be termed as enabling. The situation is becoming less friendly and less enabling for the media in general. In this situation, there is a need to take immediate steps to develop an enabling environment for the broadcast media. On the following pages I explore solutions for the issues and challenges faced by the broadcast media in Pakistan.

Autonomy and independence of the regulator

An independent and autonomous regulator, without any control of the executive branch of the government, is desirable (Griffin and Price 2004: 5). The powers of the Federal Government to issue policy directives and the control of MOI put the independence and autonomy of PEMRA at risk. Having control of PTV, PBC and PEMRA, the MOI has, in fact, control over the entire media in Pakistan. The Federal Secretary of MOI is the chairman of PTV and PBC as well as a member of the PEMRA board. This makes him the most powerful person in the media in the country.



In order to ensure independence and autonomy of PEMRA, it is necessary to reduce the role of the Federal Government in regulatory affairs and its power to issue policy directives. If necessary, the government through MOI can inform the regulator about the governmental policies; however, these policies must not be binding for PEMRA. The Authority should have the freedom to formulate its own independent policy for the regulation and monitoring of the sector. The government should not interfere in the operation of PEMRA through any policy directions/guidelines and should rather facilitate the establishment of an independent and autonomous regulator.


Structure of legal and regulatory framework

For an independent and autonomous regulatory regime to flourish, regulatory boards must be representative, with membership extended to all stakeholders, and must have open and transparent procedures. Interestingly, the current PEMRA board provides representation for some stakeholders such as civil society and the government; however, it does not have representatives from other stakeholders including media and journalists. Furthermore, the existing board is heavily dominated by ex-officio members and state-representatives. The selection process and criteria is critical, as currently it is the sole prerogative of the President to appoint the chairman, and of the Federal Government to appoint the members of the board. The procedure and criteria lack participatory decision making and arbitrarily authorise the Federal Government to appoint persons of its choice as private members of the board.

Besides, the board's role should be restricted only to the licensing and monitoring of the media and should not have control over the content of the licensees. Any kind of content restrictions may develop a trust deficit between the regulator and the operators. Griffin and Price (2004: 14) believe, the PEMRA law provides 'vague and overbroad' content related restrictions, which seem to 'control' media through such regulations. The amendments in the PEMRA Ordinance in 2007 have further empowered PEMRA to put more restrictions on the broadcast media. Such restrictions hamper the capacity of the media to effectively and meaningfully contribute towards the promotion of a democratic process in the country. Therefore, the content restrictions should be eliminated and the law should be brought into conformity with international standards (Griffin and Price 2004). Griffin and Price (2004) further recommend that the broadcasters should be allowed to adopt and enforce a self-governing code of conduct instead of government enacted and enforced content restrictions.

Technological convergence and inadequate media regulations

As the convergence of technology has blurred the difference between the telecommunication and broadcast sectors, and as the involvement of more than




one regulatory agency in the process increases the cost of licensing and operation⁶ and may lead to inefficiency and corruption, many developed countries such as the UK, Australia and South Africa have already taken steps to reduce the number of regulatory agencies (Alam 2006). By merging the telecom and media regulators, these countries have formed their communication commissions/regulators to deal with both sectors in one place. A communication commission that is fully equipped and holds all the required powers, capacities, and authorities can help reduce bureaucratic hurdles in the way of building an independent media. This may also enable the Authority to deal with the issues relating to advancement and convergence of technology in the communication sector (Alam 2006).

Media Ownership and Regulatory Deficit

The removal of the cross media ban has opened a new debate in the country. Some argue that the combination of resources of print and electronic media may produce quality in news and current affairs programmes. Others fear that the permission can result in a few large firms controlling the majority of information Pakistanis receive. McChesney (2002a, 2002b, 2003), Bagdikian (1997), and Baker (1994, 2001) argue that cross-media ownership results in concentration of media ownership and promotes ‘oligopolistic dominance.’ Cooper (2003) adds that concentration of media ownership undermines the promotion of diverse media and diversity of information. Moreover, the growing concentration of media ownership is resulting in privatization of information (Masterman 1985). However, Compaine (2002, 2005) and Elstein (2002) believe that cross media ownership does not necessarily result in media ownership concentration as there have been several unsuccessful extensions of media groups in the recent past. Moreover, McQuail (1993) and McQuail & Siune (1998) refute the argument that there exists an impact of ownership control on content quality and market competition. Rather, as some say, the permission of cross media ownership leads to “improved news and information services” (Sturm 2005) and concentration of ownership is more likely to accomplish the target of pluralistic content as compared to fragmented ownership (Craufurd Smith 2004).

As the government has now allowed cross media ownership, it would be quite difficult to turn the wheel backward. In this situation, it is important for PEMRA to immediately review all its subordinate regulations to see whether they are still effective under the new legislation. Furthermore, PEMRA should initiate the process of re-designing the relevant provisions of PEMRA Rules and Regulations in accordance with the amendments in the PEMRA ordinance. PEMRA should also assess the existing state of media ownership in the print

⁶ Najeeb Ahmed, Director of Islamabad based Power 99-FM reported that PEMRA receives a license fee and an annual fee while the PTA receives spectrum charges from broadcasters.



media market and devise categories of print media owners on the basis of their existing market share. Furthermore, PEMRA should revise the rules and regulations to meet the challenges posed by cross media ownership, particularly regarding the responsibilities of the Significant Market Players (SMPs). To provide a level playing field to all players, PEMRA should increase obligations for SMPs. The Office of Communications in the UK and the Federal Communications Commission have already devised various structures in this respect. PEMRA can benefit from these models.

Media education and research

With the expansion of the media sector in the country, the need for skilled human resources has emerged as a serious concern. Undoubtedly, a skilled and well-qualified workforce plays a pivotal role in building a free and independent media. Unfortunately, the many universities and colleges providing education in mass communication are only teaching print media courses. The universities/colleges are neither equipped with international syllabi nor with the basic training facilities to handle the burgeoning demand of the sector (Jan 2005). However, a few mass communication departments at public sector universities in the country have taken steps to develop education about radio and television through launching their own stations. Nevertheless, it is quite important to equip them with up-to-date technology and revise their curriculum in accordance with the requirements of the local and international media market. Furthermore, the regulator and international media assistance organizations must initiate training programmes for the capacity building of media workers. Legal awareness and understanding of the regulatory structure as well as of the rights and responsibilities of the media are equally important.


Conclusion

From the above discussion, it can be concluded that there is a need for an enabling regulatory regime for media that can ensure the promotion of an independent and free media in Pakistan. Such independent and free media, as explained above, is highly needed for building democracy in the country, as well as for the sustainability of democracy and democratic institutions. However, the current regulatory structure does not fulfil the requirements of an enabling environment. Governmental intervention in the regulatory business is a serious cause of concern. There is a regulatory deficit in regulating a variety of issues including cross media ownership and media ownership concentration. A trust deficit exists between the operators and the regulator that has led to questions of legitimacy of the regulator. The regulator and the government have been struggling in enforcing their writ against illegal radio stations. Lack of research in exploring innovative and modern means of regulating the sector is hampering the capability of the regulator to effectively

and efficiently regulate the sector. All this requires a thorough revision of the entire regulatory framework and a redressing of the shortcomings and inadequacies therein in the light of best international practices and keeping in view the ground realities.

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