

EXPANSIONS AND RETRACTIONS OF FREEDOMS IN THE BRAZILIAN MEDIA SYSTEM: MECHANISMS OF MEDIA ACCOUNTABILITY AND CAPTURE

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ABSTRACT

This article explores mechanisms of media capture (Schiffrin, 2021; Stiglitz, 2017) and accountability (Aznar, 2005; Bertrand, 1999/2002) alongside contributions from the political economy of communication (Bolaño, 2000; Brittos, 2022) to examine the expansion and retraction of freedoms related to the right to communication. It provides examples of how these dynamics manifest in the configuration of the Brazilian media system. The study begins by analysing how the right to communication and its implications were introduced into international debates on the construction of democratic societies in the post-World War II era. The economic, political, and socio-cognitive dimensions of these mechanisms are then related to the Brazilian context. Economically, the concentration of media ownership in Brazil has led to regulatory gaps, restricted plurality, and, more recently, reshaped communication policy dynamics through digital platforms. Politically, instances of capture have weakened accountability mechanisms and reduced social participation in Brazil's public media system. The final considerations highlight the limits and possibilities of various models of regulation, funding, and social representation in the media as strategies to counter its capture and expand freedoms.

KEYWORDS

freedoms, media capture, Brazilian media system, media accountability, media regulation

EXPANSÕES E RETRAÇÕES DE LIBERDADES NO SISTEMA DE MÍDIA BRASILEIRO: MECANISMOS DE RESPONSABILIZAÇÃO E DE CAPTURA

RESUMO

O artigo busca apresentar diferentes mecanismos de captura (Schiffrin, 2021; Stiglitz, 2017) e de responsabilização da mídia (Aznar, 2005; Bertrand, 1999/2002), somados a contribuições da economia política da comunicação (Bolaño, 2000; Brittos, 2022), para entender movimentos de expansão e retração de liberdades relacionadas ao direito à comunicação. Para isso, mostra exemplos de como essas dinâmicas são observadas na configuração do sistema de mídia brasileiro. O estudo parte da análise de como o direito à comunicação e seus desdobramentos foram inseridos na agenda dos debates internacionais para a construção de sociedades democráticas no pós-Segunda Guerra Mundial. Em seguida, buscamos relacionar as dimensões

econômicas, políticas e sócio-cognitivas desses mecanismos com a realidade brasileira. No primeiro caso, mostramos como a concentração da propriedade de mídia no Brasil impacta nas lacunas regulatórias, na limitação da pluralidade e, mais recentemente, por meio de plataformas digitais, na reconfiguração da lógica das políticas de comunicação no país. Na sequência, veremos de que maneira a captura política se reflete no arrefecimento de mecanismos de responsabilização, *accountability* e participação social no sistema de mídia público do Brasil. As considerações finais apontam para limites e possibilidades de diferentes formas de regulação, de financiamento e de representação social na mídia para recuo de capturas e expansão de liberdades.

PALAVRAS-CHAVE

liberdades, capturas da mídia, sistema de mídia brasileiro, responsabilização da mídia, regulação da mídia

1. INTRODUCTION

This study explores various mechanisms of accountability and potential sources of media capture, with a focus on the exercise of freedom within participatory democracy. In this framework, citizens not only have the right to vote and to be elected but also to engage in public debate freely. This freedom is integral to the right to communication, which is enshrined in the guarantees of freedom of expression and freedom of the press.

After World War II (1939–1945), the international political arena began to define a set of rights to support the establishment of democratic states. Among these rights is the right to communication, which is outlined in the Universal Declaration of Human Rights (Declaração Universal dos Direitos Humanos, 1948). Article 19 of the Declaration states: “everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers”.

This article demonstrates that the right to communication encompasses multiple dimensions. It includes freedom of opinion, which necessitates a plurality of viewpoints to either adopt one or form new perspectives. It also covers freedom of expression, which involves the ability to seek and receive information and ideas, as well as the capacity to express these ideas across various environments and dissemination channels.

These dimensions align with T. H. Marshall’s (1950/1967) proposal, which asserts that the right to communication spans the three dimensions of citizenship. The first is civil citizenship (freedom of expression), the second is political citizenship (the right to information), and the third is social citizenship (the right to communicate). Various international agreements and declarations on the right to communication, adopted at different times and in diverse contexts, also reflect evolving interpretations that have emerged in response to new social issues and technological advancements.

According to Venício Artur de Lima (2010), freedom of expression pertains to individual autonomy and the fundamental human right to voice and communicate one’s thoughts. In contrast, freedom of the press relates to the collective right of society and/or organisations to make journalistic information and entertainment content publicly

available. In essence, freedom of the press allows the pursuit, articulation, writing, documentation, and transmission of matters of public interest through media channels. In this regard, the writings compiled by the Hutchins Commission (Comissão Hutchins, 2020; Leigh, 1974) laid the foundation for the emergence of a theory centred on the social responsibility of the media. This theory suggests that media institutions play a vital role in defending citizens' rights within democratic societies.

However, the increasing concentration of media ownership has resulted in the uneven distribution of communication flows within society. In an effort to address this issue, the United Nations Educational, Scientific and Cultural Organisation established a commission in 1976 chaired by Irishman Sean MacBride. The commission's objective, outlined in the *MacBride Report* published in 1981, was to examine the communication challenges faced by modern societies, considering technological advancements. The aim was to issue recommendations for a new world communication order that would reduce barriers and promote peace and human development. The report concluded that the right to communicate should extend beyond merely receiving information, acknowledging that demands for free exchange, access, and participation in communication surpassed the principles previously recognised by the international community (MacBride, 1981/1983).

Although the inclusion of the right to communication in the list of human rights has been acknowledged for some time, discussions on the need to implement public communication policies only later gained prominence on the international agenda. This shift occurred with the rise of the cultural industry in the mid-20th century, which brought attention to the unequal flow of information, mirroring the economic disparities observed between nations.

In this regard, the 1988 Constitution of the Federative Republic of Brazil (Constituição da República Federativa do Brasil de 1988, 1988), for example, incorporated international guidelines related to individual freedoms. The Constitution distinguishes individual freedom of expression of thought, prohibiting anonymity (art. 5, Section IV), from freedom of expression in intellectual, artistic, scientific, and communication activities, regardless of censorship or licensing (art. 5, Section IX), and from freedom of journalistic information (art. 220, §1). Furthermore, in the section addressing social communication, §5 of Article 220 asserts that the media must not be subject to monopoly or oligopoly, either directly or indirectly. In addition to prohibiting ownership concentration, Brazilian legislation underscores the importance of regional diversity and independent production (art. 221, Section III). However, in practice, as this article will demonstrate, this ideal is not reflected in Brazil's media system. These policies highlight the need for the development of decentralised and diverse media, which would facilitate genuine and direct public participation and also stress the importance of representing the interests of women, children, young people, the elderly, national, ethnic, racial, religious, and linguistic minorities, as well as people living in remote areas.

The concept of "accountability" is closely linked to ideas of responsibility, not only in organisational contexts but also as a personal virtue at the professional level. When exercised collectively, particularly in the realm of communication, accountability can

manifest in several dimensions: legally (through laws and regulations), within the professional environment (driven by deontological principles, moral sanctions, and peer scrutiny), and in the interactions between the public and news contents and other devices (Christians, 1989).

Thus, transparency and participation are crucial allies of accountability. Transparent access to information refers to the availability of public interest data held by the State or by public and private organisations, such as the media. There is ongoing debate within the field of communication, particularly journalism, regarding the full scope of the term. It is argued that transparency not only involves making data and information accessible to the public but also entails a set of strategies aimed at rebuilding public trust through “openness” (Christofoletti, 2021). For this reason, transparency is also closely tied to the concept of “objectivity”:

the phrase that makes transparency a renewed objectivity has its roots in the field of journalism, where being objective has value and meaning. In general, the media supports the use of transparency and accountability instruments in governments, but the media companies themselves are resistant to implementing internal policies that would allow the public to monitor and debate them. (Christofoletti, 2021, p. 188)

Regarding participation — a crucial element in the triad alongside accountability and transparency, which defines ethical responsibility in media content production and distribution — several dimensions are required to create more effective connections between content producers/issuers and consumers/receivers. Nico Carpentier (2011, 2015) outlines these dimensions in the AIP model (access, interaction, and participation), which considers the connections between people, organisations, technologies, and content at these three levels. This perspective also prompts a critical examination of the limitations of participation since

both access and interaction still remain vital for participatory processes, as participation requires to have access and interaction, but participation is, at the same time, more than ‘mere’ access and interaction, because of its focus on the redistribution of power. (Carpentier et al., 2019, p. 21)

As such, it is important to examine the role of the structures and circumstances that shape the scenarios, as well as the dynamics between the actors, in order to develop tools that can foster accountability, transparency, and participation within media institutions.

Various authors (e.g., Aznar, 2005; Bertrand, 1999/2002; Coelho, 2019; Fengler et al., 2022; Paulino, 2008) have examined different accountability mechanisms, both internal and external to media organisations, that promote accountability, transparency, and participation within the media. These instruments can be implemented through heteroregulation, which involves laws or other legal norms; self-regulation, which occurs voluntarily without being mandated by legal norms; or co-regulation, which combines both normative and voluntary actions. These tools contribute to expanding freedoms, as will be discussed later in this paper.

Nevertheless, in most countries, particularly in the private media sector, these mechanisms are often underdeveloped. In Brazil, several factors contribute to the persistence of a media structure dominated by oligopolies. These include the challenges of consolidating diverse media systems that uphold the principle of complementarity between public, private, and State-run media, the difficulties in implementing mechanisms for public participation, and the limited representation of segments of the population that are excluded from media discourse.

One of the most notable limitations to press freedom, which has recurred cyclically throughout history, is the rise of dictatorial regimes that impose prior censorship on the media. These governments employ various methods, including the assassination of journalists, for example. In contemporary societies, where networked communication adds further complexities, this phenomenon is less overt but equally dangerous. Building on these risks, scholars have developed the concept of “media capture” since the early 2000s, primarily referring to the various pressures journalists face as a result of government actions:

in the case of the media, the notion of “capture” helps explain how soft censorship takes hold. In 2006, the economists Tim Besley and Andrea Prat used the notion to explain how the media in nominally democratic countries were still not at liberty to do proper investigative and accountability reporting and to function as a fully free and independent entity. Although the old-fashioned censor marking up newspapers with red ink no longer existed (at least in the societies they studied), it had been replaced by softer forms of pressure on journalists. (Schiffrin, 2021, p. 5)

These pressures on press freedom, also defined by media capture, stem not only from the government but also from other societal actors. According to Stiglitz (2017), “media capture occurs when one or more of the parties that the media are supposed to be monitoring on behalf of society ‘captures’ or takes hostage the media so that they fail to perform their societal function” (p. 10). The author identifies four types of capture that different societal actors can exert over the media: (a) through ownership, (b) through financial incentives, (c) through censorship, and (d) through cognitive influences. We align these categories with Stiglitz’s (2017) notion of “capture” which retracts press freedoms, and we extend this concept to encompass the broader right to communication.

Regarding captures related to media ownership, several mechanisms used by economic agents (whether from the market, the State, or other civil society actors) serve as tools to retract freedoms. These include concentration and cross-ownership, both vertical and horizontal (Lima, 2004).

Captures within the context of financial incentives encompass budgetary, regulatory, and marketing strategies aimed at controlling the maintenance of services and structures provided by media organisations.

As for censorship, this mechanism can manifest in varying degrees of explicitness, not only through authoritarian governments but also within business models where power structures are less open to dialogue.

When these captures occur systematically within society, they foster a culture of content production and dissemination shaped by individual and editorial decisions influenced by the cognitive capture of professionals and organisations based on coercive tools and self-censorship practices.

These capture mechanisms can be classified into three dimensions: economic, political, and socio-cognitive.

The economic dimension refers to the actors (the State, the market, and other societal agents) who mobilise the resources (financial, material, human, technological) at their disposal.

From the perspective of the political economy of communication, César Bolaño (2000) explored the trajectory of information within the capitalist mode of production, drawing on his interpretation of Karl Marx's *Capital*, particularly in the post-World War II context, when the cultural industry began to play a central role in mediation. Bolaño proposed the existence of three functions performed by these companies, whether public or private, within the social dynamic. The first one is the propaganda function, which highlights the role of the media in mediating the relationship between the State and the ideological reproduction of the system. The second is the advertising function, which refers to the mediation between the media and capitalist relations. This function is seen in the process of converting the audience into a commodity for commercial advertisements, the primary source of funding for content produced within the cultural industry. Lastly, the cultural industry's connection with the public is realised through the programme function, whereby the symbolic goods (Bourdieu, 1996/1997) produced by the media capture the public's attention, fulfilling their psychosocial needs.

From the articulation of these functions and the strategic actions of the institutions, we can observe the presence of barriers to entry as the primary characteristic of this dynamic (Bolaño, 2000). In the cultural industry, some of these methods aim to prevent potential competitors from entering the market or to eliminate the possibility of existing competitors achieving leadership. This creates significant technical, financial, political, and cognitive advantages for certain groups.

Brittos (2001) expands on Bolaño's concept, identifying two types of barriers specific to the television market that contribute to the formation of oligopolies. These barriers help companies secure privileged positions by gaining and retaining audience loyalty while shielding themselves from competitors (Brittos, 2022): aesthetic-productive barriers and political-institutional barriers.

The aesthetic-productive barrier involves factors that distinguish communication products, such as specific standards, aesthetic styles, and production models. It is through this barrier that industry leaders vie for the attention of the audience. The political-institutional barrier, on the other hand, relates to the regulatory context, considering the rules and procedures adopted within the system, as well as disputes over the enactment of laws and decisions in administrative and supervisory processes, among others.

From this perspective, we can establish a dialogue between the functions of the cultural industry, the corresponding barriers to entry, and the forms of capture. In this sense,

we believe that the propaganda function closely aligns with what Stiglitz (2017) describes as capture through self-censorship, which can occur either through official means or for ideological reasons, often by the media and professionals themselves.

The advertising function reflects financial capture, where audience ratings or the advertisers sponsoring programmes or media outlets can influence the bias of the content produced.

Finally, the programme function is linked to cognitive capture, where the aesthetic choices in the production of messages shape the public's perceptions of social reality. This can narrow worldviews and, consequently, reduce the representation of diverse cultural or informational expressions, with significant repercussions for democracy itself.

On the other hand, aesthetic-productive barriers contribute to both cognitive and financial capture. Aesthetic standards play a crucial role in the symbolic power of communication products, ensuring audience attention and loyalty and generating audience-based merchandise for the sale of advertisements. The revenue generated from the latter, in turn, provides the resources to produce more content, reinforcing existing advantages.

The aesthetic-productive dimension, when combined with the socio-cognitive dimension, involves the ways in which content producers and audiences act in accordance with the ethical, moral, deontological, and organisational values established within these communication environments.

Political-institutional barriers, in turn, are also mirrored in financial and political capture. These barriers contribute to the formation of clientelistic relationships and electronic coronelism (Aires & dos Santos, 2022), given the historical connections between media owners in Brazil, who influence political and regulatory decisions.

In this context, a form of cognitive capture and censorship is also evident, as media coverage often frames attempts to regulate communications in the country as acts of censorship (Lima, 2004). This distorts the notion that regulatory mechanisms are intended to expand freedom of expression and press. More recently, digital search services and social networks have amplified this cognitive capture, misrepresenting the State's efforts to regulate digital platforms as censorship of these services. The very existence of these barriers to entry contributes to property-based capture, as they lead to a concentrated market structure dominated by oligopolies, which, in turn, reinforce the other forms of capture.

This analysis is significant because media systems are social constructions embedded within the capitalist system and thus subject to capture, preventing them from fulfilling their social function, or what Stiglitz (2017) refers to as the "fourth estate". However, the presence of these captures does not negate the potential for checks and balances through instruments of social accountability, such as hetero-, self-, and co-regulation (Aznar, 2005).

With respect to the argument that the internet has the potential to democratise markets (Stiglitz, 2017), we contend that the emergence of new platforms operating as digital monopolies has contradicted these expectations. We maintain that the internet alone would not result in decentralisation or the dismantling of capture. Since technologies are subject to economic and political disputes, they fall within the logic of market appropriation

and concentration, with the capacity to both expand and retract freedoms. Moreover, the extensive use of data through artificial intelligence tools and algorithmic boosts has introduced new dimensions of cognitive capture, fostering greater engagement in hate speech and anti-democratic values. Nonetheless, depending on how these tools are employed, they also hold the potential to enhance dialogue.

That said, the figure below (Figure 1) illustrates how movements occur in the expansion and retraction of freedoms essential for exercising the right to communication. Freedoms — such as those of expression, information, demonstration, and representation — are framed within rights, including the right to communication. This dimension of freedoms and rights expands with the implementation of media accountability mechanisms (promoting values such as accountability, transparency, and participation) through self-, hetero-, and co-regulatory frameworks. Conversely, this same space retracts when capture mechanisms come into play, whether economic (such as ownership concentration), political (such as clientelism), or cognitive (such as coercion within newsrooms).

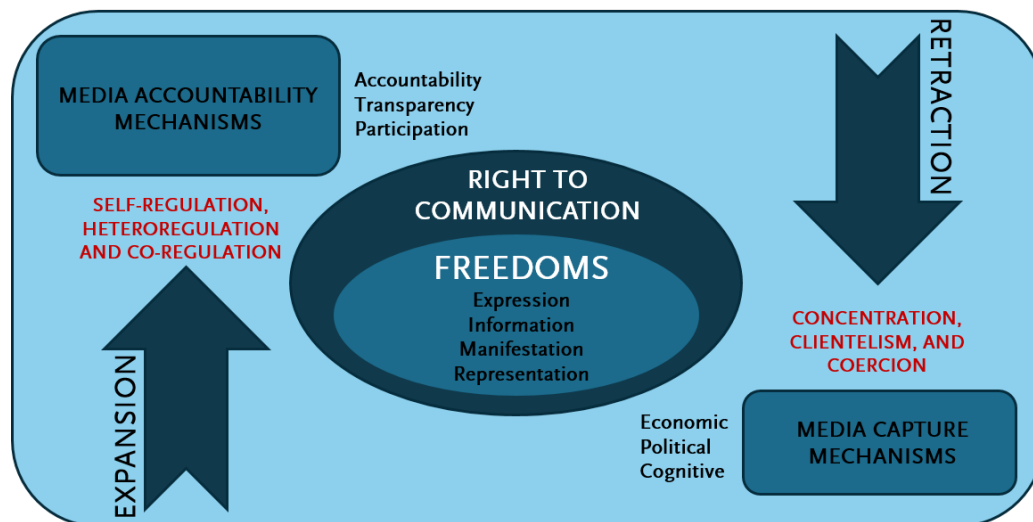


Figure 1. Movements of expansion and retraction of freedoms and the right to communication

In this article, we examine mechanisms related to both media capture and accountability, considering the media's various forms of expression. First, we discuss how media concentration in Brazil leads to the retraction of freedoms and rights and how the presence or absence of regulatory instruments can shape the development of greater media accountability. In the second part, we analyse the role of public communication within this context, focusing on the creation and capture of the Empresa Brasil de Comunicação (EBC) and how shifts in the political landscape can drive movements of expansion or retraction of freedoms.

2. ECONOMIC AND POLITICAL CAPTURE AND THE CHALLENGES OF CONCENTRATION IN BRAZIL'S MEDIA SYSTEM

As discussed, while guarantees of freedom of expression and the right to communication imply a plurality of voices in the media system, financial and political-ideological capture, driven by an oligopolistic market structure, results in aesthetic-productive and political-institutional barriers. These barriers manifest as cognitive capture, power imbalances, and restricted expressiveness, affecting the lives of various social groups.

Mastrini and Becerra (2006, 2008), in studies exploring ownership concentration in the cultural industries of Latin America, highlight the challenge of defining the term “concentration” in such studies. They also discuss the political and economic characteristics of infocommunication products that contribute to the formation of oligopolistic markets.

Economically, infocommunication products share features with other consumer goods but are distinguished by their immateriality, stemming from their symbolic nature. This characteristic means they are not consumed or destroyed upon use, enhancing their use value. Additionally, the value of cultural transactions lies in novelty, requiring significant investment in developing new products. However, reproduction costs are low compared to original production costs. As a result, these products favour economies of scale, driving companies toward monopolistic or oligopolistic market structures (Mastrini & Becerra, 2008).

In addition to economies of scale, another strategy for companies is to adopt economies of scope through segmentation. To achieve this, they need to control a range of products or market segments, increasing their chances of success. However, this results in higher barriers to entry for potential new competitors, as entering the market requires substantial initial investments. This competitive pressure on dominant positions drives companies to expand markets both locally and internationally. This strategy has been adopted by Brazil's leading communications company, represented by the Globo group, which leverages its dominant position and political influence to maintain its leadership in free-to-air television, subscription-based television channels, and, more recently, its vice-leadership in the pay streaming market, following the market leader Netflix.

Globo's hegemony, built on the centralisation of telecommunications under the military regime in the 1970s and replicated during the implementation of pay-television in the 1990s, now faces challenges with the arrival of transnational internet-based groups. This competition has intensified, particularly in streaming services, with GloboPlay emerging in 2015 to contend with international players.

This loss of leadership encompasses power struggles in defining sectoral policies and regulating communications within the country, which is governed by a regulatory framework dating back to 1962. The situation is compounded by outdated foundational regulations, fragmented subsequent legislation, and an excess of regulatory measures through ministerial decrees and ordinances (Souto & Del Bianco, 2022). Additionally, the absence of mechanisms to regulate the convergent environment and the recent changes in the “logic of communication policies” further contribute to the complexity of the situation (Bolaño, 2007).

Despite the rise in video consumption through online platforms and the growth of internet usage in Brazil, linear television — both free-to-air and pay-television — still accounts for 70% of the audience share for videos watched at home in Brazil (Kantar Ibope Media, 2023a). Furthermore, television is present in over 95% of households (Nery, 2023), while the internet is present in 80% (Núcleo de Informação e Coordenação do Ponto BR, 2023). Television also holds advantages in terms of consumption, as access to content on free-to-air television differs from that distributed on the internet, which requires the purchase of connected devices, payment for network access, and subscriptions to specific video applications.

These advantages of television over other media contribute to its dominance in advertising revenue within the country despite the increasing loss of revenue to the internet. Of the total R\$101,608,818 invested in media advertising, from January to June 2024, free-to-air television received R\$4,193,874 (39.5%), while the internet earned R\$4,051,137 (38.2%; Cenp, n.d.). Although there is no official data on how these advertising funds are distributed among media outlets, it is understood that the largest share goes to the audience leader, Globo, which had a peak audience share of 27% on average in October 2023, while Record had 7%, Band had 2%, and Rede TV! had 0.9% (Kantar Ibope Media, 2023b).

When analysing the distribution of advertising funds across different media outlets, the Media Ownership Monitor Brasil (2017) survey identified a high risk of audience concentration and ownership concentration in the allocation of advertising revenue. The survey reveals that the 50 media outlets with the largest audiences in the country belong to 26 media groups, 19 of which are based in the metropolitan region of São Paulo, demonstrating regional concentration.

The risk of concentration is exacerbated by the presence of “news deserts”, reflecting a low plurality and diversity of information, resulting in cognitive capture. The survey results show that 63.1% of municipalities in the northern part of the country have no news coverage at all. Additionally, several regions lack television broadcasters, while the number of retransmission stations is almost 10 times the number of television broadcasters¹. This phenomenon explains the reproduction of content generated in other regions, contrary to the principle of regionalisation of production outlined in the Federal Constitution, as discussed in the introduction section.

As a result, Mielke et al. (2023) describe a scenario of concentration both in traditional media and the digital environment, with various forms of capture emerging. The authors highlight economic and cognitive capture, particularly influenced by the historical ties between the media, political power, and the interests of economic and religious groups that perpetuate unequal, patriarchal, and racist discourses. They further argue that the business model of digital platforms on the internet poses a threat to the diversity of viewpoints and ways of life, as well as to the development of technologies that could advance democracy and social and environmental justice.

¹ According to Agência Nacional de Telecomunicações (n.d.), in November 2023, Brazil had 24,913 television retransmission stations, while the number of television broadcasters stood at 2,920.

The close ties between politicians, their families, and economic interests within media ownership groups in Brazil have led to the phenomenon of “electronic coronelism” (Aires & dos Santos, 2022), a term derived from “coronelismo” (Leal, 1975/2012) and applied to the context of media regulation in the country.

Beyond the instances of electronic coronelism, political, property, and financial capture, along with political-institutional barriers in the country, Souto and Del Bianco (2022) also identified what is referred to as “liberal capture”² (Guerrero & Márquez-Ramírez, 2014). Analysing regulatory measures implemented during President Jair Bolsonaro’s Administration for broadcasting between 2019 and 2021, the authors observed that these regulatory actions were directed towards favouring corporate broadcasters. According to their findings,

this communication policy supports the electronic media business by enhancing its profitability while aligning with political, economic, and religious interests. It maintains the regulatory fragmentation characteristic of Brazilian broadcasting legislation. (Souto & Del Bianco, 2022, p. 108)

Here, we examine how these types of liberal captures relate to political-institutional barriers, as well as financial and political captures, which result in the subjugation of actors and sectors such as public, educational, and community communication. This is compounded by the rise in religious proselytism, even within spaces intended for public communication (Souto, 2023).

This situation signifies a deepening mismatch between technologies and communication regulation (Costa, 2022), highlighting major regulatory asymmetries between increasingly convergent services. Furthermore, there is a lack of an independent authority to oversee the audiovisual sector, leading to consequences such as human rights violations, unethical behaviour, a lack of media accountability mechanisms, and the indefinite renewal of radio and television licences, with insufficient compensation for the provision of public services.

In addition, due to the competition between traditional services and social media and content platforms, a new logic has emerged in communication policies in the country. This logic sees the inclusion of ultra-liberals alongside the so-called “conservative”, “progressive”, and “liberal” groups (Bolaño, 2007). In other words, digital monopolies are reluctant to accept any form of State or even public regulation, benefiting from their operation on a supranational scale. This reinforces the need to establish rules and safeguards for national productions, protect local culture and promote democratic values.

² The concept highlights how national media systems become intertwined with the combined economic and political interests of privileged groups. In Latin America, these groups adapted and repositioned themselves during the process of political re-democratisation — which most countries in the region experienced — instituting neoliberal policies from the 1980s through the early 21st century (Guerrero & Márquez-Ramírez, 2014). As the authors observe, despite political liberalisation and a noticeable diversification in journalistic coverage from that period onward, the model often preserved established local power structures. It also facilitated the expansion of economic and marketing advantages while maintaining the enduring ties between media groups and the State — a defining feature of Latin American history (Souto & Del Bianco, 2022).

The coexistence of “new and old actors” (Costa, 2022) calls for media education measures, the promotion of plurality, content that fosters citizenship, the fight against disinformation, participation mechanisms, and the consolidation of a public system that complements both the commercially operated and State-owned systems. The following section further explores this, highlighting the existence of economic, political, and cognitive capture.

3. CITIZENSHIP, SOCIAL PARTICIPATION AND CAPTURES IN THE BRAZILIAN PUBLIC MEDIA SERVICE

Although the Brazilian media system is characterised by private concentration, the development of broadcasting in the country is also deeply rooted in a public model with educational and cultural objectives. This intention was evident when the first radio station, Rádio Sociedade do Rio de Janeiro, was inaugurated in 1923 by Edgard Roquette-Pinto, with a programme that prioritised educational, cultural, and scientific content. Years later, in 1936, the station was donated to the Ministry of Education, with the State assuming responsibility for safeguarding this heritage.

In the case of television, the country’s leading broadcaster in terms of cultural and educational content, TV Cultura³, was initially founded by private initiative and later sold to the São Paulo state Government, which currently manages it through the Padre Anchieta Foundation. Other initiatives for the creation of educational radio and television stations, such as university-run stations, emerged in the 1960s following the establishment of legal mechanisms that facilitated such concessions (Coelho, 2019; Pieranti, 2018).

In addition to these, a large number of local radio stations linked to community associations have been operating under authorisation since 1998, when Law 9.612 (Lei n. 9.612, 1998) was enacted, establishing the Community Broadcasting Service in Brazil. According to the law, these “low-power, restricted coverage” stations aim to broadcast content that promotes the integration of local communities and “provide opportunities for the dissemination of ideas, cultural elements, traditions, and social habits of the community” (art. 3, Section I).

The law also outlines principles of financial and administrative autonomy for these broadcasters and permits alternative forms of funding, such as sponsorship or cultural support (Lei n. 9.612, 1998). Despite these provisions, which theoretically ensure greater independence for these radio stations, the Brazilian community radio landscape shows an influence of commercial, political, and religious interests (Ferreira, 2005), particularly in the form of proselytism⁴.

³ TV Cultura first began broadcasting in 1960, with the concession of a second channel from the Diários Associados group, which had already operated TV Tupi, Brazil’s first television channel. In 1969, the channel was acquired by the Padre Anchieta Foundation, an institution managed by the São Paulo government, with representation from various sectors of São Paulo society and direct funding from the state’s citizens.

⁴ The original text of the law, in Article 4, Paragraph 1, prohibited any form of proselytism (efforts to convince or convert individuals to a particular religious or political belief, for example). In 2018, however, the Supreme Court ruled that this provision was unconstitutional, thereby allowing religious proselytism on community radio in the name of freedom of expression (Ventura et al., 2021).

Television stations with community and educational principles, as well as other public broadcasters, are also provided for in Brazilian legislation; however, their method of transmission is restricted to pay-television channels. These spaces were initially guaranteed by Law 8.977/1995 (Lei n. 8.977/1995, 1995), known as the “Cable Law”, which allocated eight basic channels for free use, including community and educational television, as well as channels linked to the local and national legislative, executive, and judicial powers⁵.

However, community and public values are not only expressed through broadcasting stations and subscription-based channels. Much of this content is also broadcast and made available through other unregulated means (Peruzzo, 2010), both traditional and local (such as community radio and loudspeaker trucks, for example) and via the internet (e.g., web radio and television servers, as well as video and audio repositories).

In this context, a range of initiatives aimed at promoting public-interest content — whether cultural, educational, or informative — can be observed. These initiatives also present opportunities for developing mechanisms that foster financial and administrative autonomy, thus enabling the expression of public interest through citizen representation and participation.

In 2007, as part of a mobilisation⁶ that brought together social movements in the field to advocate for the creation of a nationwide public television⁷, based on the merger of institutions managing State-funded broadcasters⁸, the Federal Government established EBC. One of its key objectives was to manage a National Public Communication Network⁹. With the enactment of the law that created EBC (Lei n. 11.652/2008, 2008), the term “Public Broadcasting Service” was used for the first time in Brazilian legislation to describe an institution responsible for providing this type of service nationwide.

Over the past 15 years, a number of academic studies in the field of communication have sought to understand the creation and development of EBC as the operator of the national public communication system in Brazil (e.g., Bucci & Vannuchi, 2021; Paulino & Silva, 2013; Pieranti, 2018; Valente, 2009). Several mechanisms were put in place during its establishment to ensure the company’s autonomy from State economic and political interests, including (a) the creation of a Contribution for the Promotion of Public Broadcasting¹⁰ to provide alternative funding; (b) the establishment of two internal

⁵ These provisions were upheld even after the subsequent amendments introduced by Law 12.485/11 (Lei n. 12.485/11, 2011), which regulates various pay-television services, or conditioned access services.

⁶ The “1st Public Television Forum” took place in May 2007, convening organisations and social movements advocating for the democratisation of communication. One of the outcomes was a letter outlining agendas related to the creation of a national public television and the reinforcement of regional public broadcasters.

⁷ This aligns with the provisions of Article 223 of the Brazilian Constitution, which calls for the complementarity of private, State, and public broadcasting systems (Constituição da República Federativa do Brasil de 1988, 1988).

⁸ Empresa Brasil de Comunicação was created through the merger and transformation of Radiobrás and Associação de Comunicação Educativa Roquette Pinto, with the objective of providing public communication services on behalf of the State (Lei n. 11.652, 2008).

⁹ According to the Empresa Brasil de Comunicação website (<https://www.ebc.com.br/veiculos/rncp>), on November 20, 2023, the network included 68 television stations and 39 radio stations.

¹⁰ This contribution is to be paid by telecommunications companies; however, a significant portion of the funds collected is either held in court or has been withheld by the Executive.

accountability and social participation mechanisms (an Ombudsman¹¹ and a Board of Trustees¹²); and (c) a fixed term for the company's CEO.

Between 2008 and 2016, EBC's Ombudsman and Board of Trustees worked in collaboration, facing a series of conflicts with the company's Board of Directors. They publicised debates related to EBC's strategic objectives as a public communication entity, driving changes in the processes and content broadcast by its outlets¹³.

This period saw an enhanced expression of EBC's participation mechanisms, both administratively and in media terms. This can be exemplified by the content produced by the Ombudsman and the Board between 2011 and 2015, including (a) the Ombudsman's analyses of received demands, published in weekly radio and television programmes, as well as in a web column; along with monthly, bimonthly, biannual, and annual reports; and internal newsletters (Coelho, 2019); (b) the Board, which broadcast its meetings via web streaming and published meeting minutes, strategic planning documents, resolutions, recommendations, press releases, and a weekly magazine (Strozi, 2019).

Following the change in leadership of the Brazilian Federal Executive in 2016, with the impeachment of Dilma Rousseff and the ascent of governments advocating the extinction or privatisation of EBC, a series of attacks were directed at the company and its accountability and social participation mechanisms. These included the abolition of the Board of Trustees and the undermining of debates in the Ombudsman's Office.

In addition to these actions, the following are particularly noteworthy: the termination of the mandate of EBC's CEOs; attempts to privatise the company; retaliation against journalists for content published; the unification of TV Brasil's programming (a public broadcaster) with NBR (a government broadcaster); and the appointment of military personnel with no connection to the communications sector to strategic positions within the company.

It should be noted that governmental influences on EBC's organisational culture have always been present to some degree (Bucci & Vannuchi, 2021). However, with the rise of neoliberal and far-right governments, these influences evolved into institutionalised forms of capture. In response, civil society movements advocating for the democratisation of communication, alongside EBC employees, former members of the now-defunct Board, and representatives from academia, united in efforts to defend both EBC and public communication in Brazil.

In this context, the Frente em Defesa da EBC emerged, launching social media campaigns and parliamentary initiatives since 2016 to raise awareness among the public and political figures about the importance of EBC in upholding the principles of public communication in the country. Another key initiative, Ouvidoria Cidadã da EBC, was

¹¹ The general ombudsman is appointed for a two-year term to internally review the content broadcast by the company through administrative and media products.

¹² Empresa Brasil de Comunicação's Board of Trustees was composed of 22 members (15 representing civil society), with strategic advisory and deliberative functions for the company. In 2017, it was replaced by an Editorial and Programming Committee, with less representation and fewer responsibilities, which had not been effectively installed as of this writing.

¹³ An example can be found in the adoption of a religious diversity track for TV Brasil, as reported by Viula and Paulino (2015).

established to address gaps in the company's social control, accountability, and participation mechanisms.

With regard to the attacks on the company's employees, the facts and data confirm explicit government interference in content, as well as threats to journalists and other professionals. In response to these attacks, company employees published four reports (Comissão de Empregados da EBC et al., 2022; Em Defesa da EBC, n.d.) between 2018 and 2022 documenting cases of censorship and/or government interference in EBC content and processes. These reports documented a total of 986 cases of censorship, government interference (both direct and indirect), government overreach, and irrelevant agendas during this period.

However, journalists responsible for compiling these reports argue that the actual numbers are higher, as many professionals do not report their experiences out of fear of reprisals or because they do not perceive these acts as censorship or government overreach but as commonplace within the company. (Paixão, 2021, p. 82)

These attacks have weakened the debates held in the Ombudsman's Office, the only social participation mechanism currently still functioning within the company. Since 2018, the reports produced have shown less critical content (Nitahara & Luz, 2021), alongside a reduction in media spaces dedicated to Ombudsman discussions (Coelho & Paulino, 2019). By 2023, these issues remain unresolved, as even with Lula da Silva's return to the presidency of the Republic — the same leader who established the institution 15 years ago — EBC continues to face persistent challenges related to its public service mandate¹⁴.

The EBC case highlights the impact of self-, hetero-, and co-regulatory mechanisms on expanding or restricting communication-related freedoms and rights. The involvement of social actors has played a crucial role in shaping norms aimed at positioning the company as a national public broadcasting service provider, at least in principle.

In practice, this mobilisation proved insufficient to prevent the capture orchestrated by key social actors. The influence of political agents is particularly evident, as shifts in power within the Federal Executive played a decisive role not only in the company's formation but also in its capture, encompassing economic, political, and cognitive dimensions.

4. FINAL CONSIDERATIONS

Considering these dynamics of expanding and retracting freedoms — linked on one side to accountability mechanisms fostering transparency and participation and on the other to the economic, political, and socio-cognitive aspects of media capture — we offer some reflections to inform debates on the subject.

First, we highlight the significance of freedoms associated with the right to communication (such as freedom of the press, expression, and opinion) in shaping modern societies. This includes the establishment of normative and regulatory mechanisms that define the conduct of media institutions. The ways in which these mechanisms are

¹⁴ As argued in the public note from the Front in Defence of EBC and Public Communication (Frente em Defesa da EBC e da Comunicação Pública, 2023).

implemented — whether imposed by the State or initiated voluntarily by civil society — help delineate the boundaries of rights and freedoms. Economically, regulation sets limits on capital while ensuring service provision with both freedom and responsibility. Politically, formal regulation can curb government influence while fostering citizen participation in decision-making. In the socio-cognitive realm, regulatory frameworks can promote the representation of diverse individual and collective expressions in both content production and consumption.

In this context, the implementation of external mechanisms such as regulatory bodies, awareness campaigns, and audience groups, along with internal mechanisms like codes of ethics, participatory councils, and ombudsman services, has the potential to promote the expansion of freedoms within society. Conversely, increased ownership concentration and ideological coercion, driven by systemic barriers, naturally result in a retraction of these freedoms. The financing structures of media institutions play a crucial role in maintaining this balance between responsibility and capture. A balance between financial independence and constraints on commercial exploitation is essential to ensure that consumer and citizen freedoms are respected. State institutions must focus on using public budgets in ways that serve the public interest, while public media should explore diverse and sustainable funding models to preserve their autonomy¹⁵.

Moreover, efforts to enhance media accountability and mitigate capture must include awareness-raising initiatives. Within media institutions, fostering a culture of responsibility involves engaging professionals through ethical guidelines and audiences through critical evaluation of published content. These relationships should also extend to content-sharing platforms among users who are not media professionals. In such cases, information and media literacy¹⁶ should be promoted in both formal educational environments and community-based initiatives.

Finally, by setting out parameters to identify accountability and capture mechanisms in specific media contexts, we aim to contribute to the development of analytical models that engage with diverse realities. Through this contribution, we hope to pave the way for international discussions on the topic.

Translation: Anabela Delgado

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¹⁵ Some of these alternatives are already stipulated by law. Still, in practice, they are not implemented as they should be, as seen with the Contribution for the Promotion of Public Broadcasting, a tax levied on telecoms and other service providers to support Empresa Brasil de Comunicação. Other alternatives include monetisation through social media (such as TV Cultura’s YouTube channels, for instance), crowdfunding, or the implementation of cultural promotion projects.

¹⁶ According to Souza and Valle (2021), this form of literacy “can be defined as a learning process that incorporates critical thinking, ethical reflection, and argumentation, and fosters conscious decision-making among citizens” (p. 111), taking into account the relationship between these citizens and both the technological tools they use and the content they consume and produce across various platforms.

REFERENCES

- Agência Nacional de Telecomunicações. (n.d.). *Estações de TV FM e OM*. Retrieved November 28, 2023, from <https://informacoes.anatel.gov.br/paineis/outorga-e-licenciamento/estacoes-de-tv-fm-e-om>
- Aires, J., & dos Santos, S. (2023). Coronelismo eletrônico não é uma metáfora: Categorização da radiodifusão brasileira. *E-Compós*, 26, 1–18. <https://doi.org/10.30962/ec.2621>
- Aznar, H. (2005). *Comunicación responsable: Deontología y autorregulación de los medios*. Ariel.
- Bertrand, C. J. (2002). *O arsenal da democracia: Sistemas de responsabilização da mídia* (M. L. Loureiro, Trans.). Edusc. (Original work published 1999)
- Bolaño, C. R. S. (2000). *Indústria cultural, informação e capitalismo*. Hucitec.
- Bolaño, C. R. S. (2007). *Qual a lógica das políticas de comunicação no Brasil?* Paulus.
- Bourdieu, P. (1997). *Sobre a televisão* (M. L. Machado, Trans.). Jorge Zahar. (Original work published 1996)
- Brittos, V. C. (2001). *Capitalismo contemporâneo, mercado brasileiro de televisão por assinatura e expansão transnacional* [Doctoral dissertation, Universidade Federal da Bahia].
- Brittos, V. C. (2022). *Estudos culturais, economia política da comunicação e o mercado brasileiro de televisão*. CLACSO.
- Bucci, E., & Vannuchi, C. (2021). A EBC à mercê do governo - Qualquer governo. *E-Legis – Revista Eletrônica do Programa de Pós-Graduação da Câmara dos Deputados*, 14(36), 211–226.
- Carpentier, N. (2011). *Media and participation: A site of ideological-democratic struggle*. Intellect.
- Carpentier, N. (2015). Differentiating between access, interaction and participation. *Conjunctions*, 2(2), 7–28. <https://doi.org/10.7146/tjcp.v2i2.23117>
- Carpentier, N., Melo, A. D., & Ribeiro, F. (2019). Resgatar a participação: Para uma crítica sobre o lado oculto do conceito. *Comunicação e Sociedade*, 36, 17–35. [https://doi.org/10.17231/comsoc.36\(2019\).2341](https://doi.org/10.17231/comsoc.36(2019).2341)
- Cenp. (n.d.). *Painel 2024 – Jan a jun – 325 agências (263 matrizes e 62 filiais)*. Retrieved January 3, 2025, from <https://www.cenp.com.br/cenp-meios-relatorios/painel-janeiro-a-junho-2024>
- Christians, C. (1989). Self-regulation: A critical role for codes of ethics. In E. E. Dennis, D. M. Gilmor, & T. L. Glasser (Eds.), *Media freedom and accountability* (pp. 35–54). Greenwood Press.
- Christofoletti, R. (2021). Transparency, innovation, and journalism. In M. Luengo & S. Herrera (Eds.), *News media innovation reconsidered* (pp. 187–201). John Wiley & Sons.
- Coelho, J. F. G. (2019). *Ombudsman e comunicação pública no Brasil e Portugal* [Doctoral dissertation, Universidade de Brasília]. Repositório Institucional da UnB. <https://repositorio.unb.br/handle/10482/35794>
- Coelho, J. F. G., & Paulino, F. O. (2019). Ombudsman e comunicação pública: A atuação da Ouvidoria da EBC nos seus primeiros 10 anos de existência. *Revista Brasileira de História da Mídia*, 9(1), 61–79.
- Comissão de Empregados da EBC, Ouvidoria Cidadã da EBC, Sindicatos dos Jornalistas do DF, SP e RJ, & Sindicatos dos Jornalistas do DF, SP e RJ. (2022). *Censura censura censura: 4ª Edição do dossiê de censura e governismo na EBC*. <https://fenaj.org.br/wp-content/uploads/2022/09/Dossie-Censura-e-Governismo-EBC-4a-Edicao-FINAL.pdf>
- Comissão Hutchins. (Ed.). (2020). *Uma imprensa livre e responsável: Comissão de liberdade de imprensa* (M. C. Ramos & F. O. Paulino, Trans.). Insular.

- Constituição da República Federativa do Brasil de 1988, https://www.planalto.gov.br/ccivil_03/constituicao/constituicao.htm
- Costa, A. B. L. da. (2022). *Velhas e novas barreiras, novos e velhos atores: Descompasso entre tecnologias e regulação das comunicações no Brasil* [Doctoral dissertation, Universidade de Brasília]. Repositório Institucional da UnB. <https://repositorio.unb.br/handle/10482/44582>
- Declaração Universal dos Direitos Humanos, December 19, 1948, https://e4k4c4x9.delivery.rocketcdn.me/pt/wp-content/uploads/sites/9/2023/10/PT-UDHR-v2023_web.pdf
- Em Defesa da EBC. (n.d.). *Dossiê*. Retrieved January 3, 2025, from <https://emdefesadaebc.wordpress.com/?s=dossie>
- Fengler, S., Eberwein, T., & Karmasin, M. (Eds.). (2022). *The global handbook of media accountability*. Routledge.
- Ferreira, G. S. N. (2005). Rádio comunitária e poder local: Um estudo das relações entre os poderes locais e as novas emissoras legalizadas da região Noroeste do estado de São Paulo. In P. S. Fidalgo (Ed.), *Actas do III Congresso da Sopcom, VI Congresso da Lusocom e II Congresso Ibérico* (Vol. 2; pp. 205–215). Universidade da Beira Interior.
- Frente em Defesa da EBC e da Comunicação Pública. (2023, September 5). *Nota pública: Oito meses de governo sem comunicação pública*. Em Defesa da EBC. <https://emdefesadaebc.wordpress.com/2023/09/05/nota-publica-oito-meses-de-governo-sem-comunicacao-publica/>
- Guerrero, M. A., & Márquez-Ramírez, M. (2014). The ‘capture’ of media systems, policies, and industries in Latin America: Concluding remarks. In M. A. Guerrero & M. Márquez-Ramírez (Eds.), *Communication policies in Latin America* (pp. 293–304). Palgrave Macmillan.
- Kantar Ibope Media. (2023a). *Inside video 2023*. <https://www.kantarmedia.com/reports/inside-video-2023>
- Kantar Ibope Media. (2023b, November 22). *Audiência de TV PNT TOP 10 | 13/11 a 19/11/23*. <https://kantariopemedia.com/conteudo/dados-rankings/dados-de-audiencia-pnt-top-10-com-base-no-ranking-consolidado-13-11-a-19-11-2023/>
- Leal, V. N. (2012). *Coronelismo enxada e voto. O município e o regime representativo no Brasil*. Companhia das Letras. (Original work published 1975)
- Lei n. 8.977, de 6 de janeiro de 1995. (1995). https://www.planalto.gov.br/ccivil_03/leis/L8977.htm
- Lei n. 9.612, de 19 de fevereiro de 1998. (1998). https://www.planalto.gov.br/ccivil_03/leis/l9612.htm
- Lei n. 11.652, de 7 de abril de 2008. (2008). https://www.planalto.gov.br/ccivil_03/_ato2007-2010/2008/lei/l11652.htm
- Lei n. 12.485/11, de 12 de setembro de 2011. (2011). https://www.planalto.gov.br/ccivil_03/_ato2011-2014/2011/lei/l12485.htm
- Leigh, R. D. (Ed.). (1947). *A free and responsible press: A general report on mass communication*. University of Chicago Press.
- Lima, V. A. de. (2004). *Mídia. Teoria e política*. Perseu Abramo.
- Lima, V. A. de. (2010). *Liberdade de expressão x Liberdade de imprensa: Direito à comunicação e democracia*. Publisher Brasil.
- MacBride, S. (1983). *Un solo mundo, voces multiples: Comunicación e información en nuestro tiempo* (E. Zagury, Trans.). Fondo de Cultura Económica. (Original work published 1981)

- Mastrini, G., & Becerra, M. (2006). *Periodistas y magnates. Estructura y concentración de las industrias culturales en América Latina*. Prometeo.
- Mastrini, G., & Becerra, M. (2008). *Los dueños de la palabra: Acceso, estructura y concentración de los medios en la América latina del siglo XXI*. Prometeo.
- Marshall, T. H. (1967). *Cidadania, classe social e status* (M. P. Gadelha, Trans.). Zahar Editores. (Original work published 1950)
- Media Ownership Monitor Brasil. (2017, October). *Mídia*. <https://brazil.mom-gmr.org/br/midia/>
- Mielke, A. C., Pasti, A., Nobrega, C., Cunha, C. V. da, Guimarães, F. L., Mendes, G., Fernandes, I. V., Valente, J., Gallas, L., Bandeira, O., Pinto, P., Evangelista, R., & Terso, T. (2023). *Quem controla a mídia? Dos velhos oligopólios aos monopólios digitais*. Veneta.
- Nery, C. (2023, November 9). *Em 2022, streaming estava presente em 43,4% dos domicílios com TV*. Agência IBGE. <https://agenciadenoticias.ibge.gov.br/agencia-noticias/2012-agencia-de-noticias/noticias/38306-em-2022-streaming-estava-presente-em-43-4-dos-domicilios-com-tv>
- Nitahara, A., & Luz, C. R. M. (2021). O desmonte da participação social na EBC. *Revista Eptic*, 23(2), 22–37.
- Núcleo de Informação e Coordenação do Ponto BR. (2023). *TIC domicílios: Pesquisa sobre o uso das tecnologias de informação e comunicação nos domicílios brasileiros 2022*. Comitê Gestor da Internet no Brasil.
- Paixão, M. (2021). *Rádiodifusão pública à brasileira: As mudanças feitas na EBC de 2016 a 2020* [Final course work, Universidade de São Paulo].
- Paulino, F. O. (2008). *Responsabilidade social da mídia: Análise conceitual e perspectivas de aplicação no Brasil, Portugal e Espanha* [Doctoral dissertation, Universidade de Brasília]. Repositório Institucional da UnB. <http://repositorio.unb.br/handle/10482/5175>
- Paulino, F., & Silva, L. M. (Eds.). (2013). *Comunicação pública em debate: Ouvidoria e rádio*. Editora Universidade de Brasília.
- Peruzzo, C. (2010, June 8–11). *Rádios comunitárias no Brasil: Da desobediência civil e particularidades às propostas aprovadas na CONFECOM* [Conference presentation]. Encontro Anual da Compós, Rio de Janeiro, Brazil.
- Pieranti, O. P. (2018). *A radiodifusão pública resiste: A busca por independência no Brasil e no Leste Europeu*. FAC Livros.
- Schiffrin, A. (Ed.). (2021). *Media capture: How money, digital platforms, and governments control the news*. Columbia University Press.
- Souto, A. C. M. (2023). *A política de comunicação do Governo Bolsonaro para a radiodifusão: Do discurso de desburocratização aos interesses efetivos em jogo* [Master's thesis, Universidade de Brasília].
- Souto, A. C. M., & Del Bianco, N. R. (2022). Política para a radiodifusão no governo Jair Bolsonaro: Do discurso liberal aos indícios de captura do Estado. *Revista Rumores*, 16(32), 107–128. <https://doi.org/10.11606/issn.1982-677X.rum.2022.200122>
- Souza, K. de J., & do Valle, M. G. (2021). Alfabetização midiática e informacional: Uma revisão sistemática da literatura. *Pesquisa em Foco*, 26(2), 109–122. <https://doi.org/10.18817/pef.v26i2.2725>
- Stiglitz, J. E. (2017). Toward a taxonomy of media capture. In A. Schiffrin (Ed.), *In the service of power: Media capture and the threat to democracy* (pp. 9–17). Center for International Media Assistance.

- Strozi, G. G. (2019). *Vida e morte do Conselho Curador da EBC* [Master's thesis, Universidade de Brasília]. Repositório Institucional da UnB. <https://repositorio.unb.br/handle/10482/38504>
- Valente, J. C. L. (2009). *TV pública no Brasil: A criação da TV Brasil e sua inserção no modo de regulação setorial da televisão brasileira* [Master's thesis, Universidade de Brasília]. Repositório Institucional da UnB. <http://repositorio2.unb.br/jspui/handle/10482/5468>
- Ventura, A. C. R., Júnior, E. E. M., & Curado, H. B. (2021). Proselitismo religioso em rádios comunitárias - ADI 2566 de 2018. *Dignitas - Revista Internacional do Instituto Brasileiro de Direito e Religião*, 2(1), 91–106.
- Viula, R., & Paulino, F. O. (2015). A TV de todos os santos está no ar: O debate sobre diversidade religiosa na Empresa Brasil de Comunicação. *Anuário Unesco/Metodista de Comunicação Regional*, 19, 215–229.

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