

# Communications in the public interest: A framework for policy reform in national networked environments

International Research from the Freedom of Expression Project

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The Freedom of Expression Project began in 2006 as a response to global changes in networked digital communications. It set out to assess and understand this developing environment's relationships with democracy, justice and human achievement. The Project is working to promote principles to help guide policy and activity in the networked communications environment: the aim is to build an environment that supports human rights and the public interest. [www.freedomofexpression.org.uk](http://www.freedomofexpression.org.uk)

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# 1 Introduction: shaping the networked world

This report introduces the findings of a series of independent research projects that explore relationships between communications environments, freedom of expression and the public interest in Argentina, Brazil, Indonesia, Kenya and Pakistan. The research was undertaken during 2008 by partner organisations in the Freedom of Expression Project.

The Freedom of Expression Project is a global collaboration to shape the networked communications environment as it continues to develop. We believe that we now have a real opportunity, as digital communications spread across the world, to work towards democratising freedom of expression and communications and to advance human rights. There are new opportunities to empower people, including those who are dispossessed, poor or excluded. There are opportunities to increase people's access to knowledge, to enable communication and collaboration and to stimulate human creativity. But if these gains are to be realised, we need to make sure that developing communications environments are shaped by principles that support the interests of human communities. This has been the thinking behind the Project's work to develop and apply policy principles for the networked communications environment.

The aims of the research were:

- to enable organisations to map aspects of the communications environment in countries in the global South, identify issues of concern and their priorities for advocacy
- to test the Project's analytical framework in a range of different contexts.

This report first describes the Project's framework for analysis and its context. We are seeing a potentially epochal shift in communications as a result of the disruptive and transformative power of networked digital communications. The Project's work is firmly rooted in internationally agreed human rights and the concept of the public interest. We use a 'layer model' to understand the complexity and dynamics of the communications environment. Principles to guide policy making are designed to translate shared values into reality at each layer of the environment.

We then summarise the research projects and offer a thematic overview of their independent findings, together with reflections on the application of the Project's analytical framework in very varied contexts. Finally, we describe the direction of the Project's current work and outline its future priorities.

## 2 The analytical framework

### 2.1 Human rights and the public interest

Freedom of expression, as defined in Article 19 of the Universal Declaration of Human Rights, is a foundation human right. It guarantees that we can receive and exchange information, regardless of frontiers. Where this right is protected, we can safeguard other rights and freedoms. Democracy can thrive, economic development can advance and culture can flourish. The open exchange of ideas is at the heart of what makes us human. For freedom of expression to be fully realised, we have to be able to exchange opinions, ideas and information *as public acts*. Freedom of expression therefore rests on the public communication platforms that we use, which need to have characteristics and behaviours that support progressive public discourse. In other words, freedom of expression requires that the communications environment supports the public interest.

The concept of the public interest is firmly linked to liberal democracy and accountable governance. It draws on values of community, equality and public participation in society. It can help to balance competing claims and interests in society, bringing democratic values into consideration rather than sectional or individual interests alone. It is a flexible concept and can protect citizens and consumers in a wide range of situations. While this flexibility is a strength, definitions of the public interest need to be rooted in individual human rights as defined in international law. Human rights are the foundation of any democratic society, and therefore any policy that violates human rights cannot be in the public interest.

Taken together, the concepts of human rights and the public interest can help policy makers to balance individual and collective interests, to foster just and democratic societies that support human advancement. So how do these apply in the new communications environment?

### 2.2 The new communications environment: challenges and opportunities

Traditional media, from cave painting to modern broadcast or print media, have operated with a ‘one-to-many model’: content from a point of origin is distributed to a consuming audience. So the battle for free expression has historically been about censorship of content – involving the government, the editor or journalist, the creative source and the media owner – with the working assumption that the journalist, editor or content creator is the popular champion pitted against the state censor or the all-powerful media mogul. Human rights actors have been concerned with who controls the content in the communications channel or ‘pipe’, for example in a discussion about bandwidth allocation where bandwidth is limited. The ‘pipe’ itself has only attracted marginal attention.

But we now have a more diverse, more malleable, more transnational media world. Peer-to-peer models of communication sit alongside and interact with one-to-many models, notions of authority are under severe strain and the traditional media model is losing its business viability.

The new communications environment is digital and accessible by a broad range of devices, from mobile phone to computer to TV and radio. It can be understood as multi-layered, consisting of: the physical infrastructure; connectivity between devices; applications for users

to interact with it; and content. It is being shaped by business imperatives, by attempts at government regulation, and by users themselves in a way that is unprecedented. Not for profit motivation is as strong in some areas as the need to generate income. There are strong generational divisions in the use of these media.

What does this mean for human rights? This is not merely new technology in the way that broadcast technology was new technology compared to print. Broadcast emerged in a different frame, but both broadcast and print use the same communication model of ‘one-to-many’. The new environment’s ‘peer-to-peer’ collaboration on content is potentially an epochal shift, equivalent in significance to Gutenberg’s printing press.

- It represents a major shift in authority. One-to-many models are not dying out, although they struggle to be funded. They exist but they are challenged and mutated by peer-to-peer collaboration. The absence of a single point of origin for content means that authority is hard to sustain – no one is responsible.
- It challenges traditional models of working. Traditional hierarchies are ill-equipped to work in a viral world; sources of information can be exposed from multiple directions. Human rights NGOs organised around traditional models, of single points of control and attempts to discipline the message, will no longer have traction with people who are used to viral working.
- Content is often reshaped by the pipe, so we need to apply human rights standards and values to the whole communications environment, not just to the content.
- ‘Barbed wire’ is being erected across all the communication environment’s layers. Burma does not like coverage of anti-government demonstrations so it shuts down the whole infrastructure. Equipment that provides network access can be used to block access to sites for political reasons, anywhere in the world. Google applications are restricted for use in China. Intellectual property ownership is used to restrict access to knowledge. Traditional censors battle to control content in media that are increasingly porous.
- The tools that help us get past that barbed wire are also multiplying. Mobile phones can stream images of police brutality to the web in Burma. Digital cameras record ill treatment in Abu Ghraib. SMS messages can mobilise millions and topple presidents. Farsi websites can provide the medium for Persian poetry and Iranian politics that are denied in conventional space.

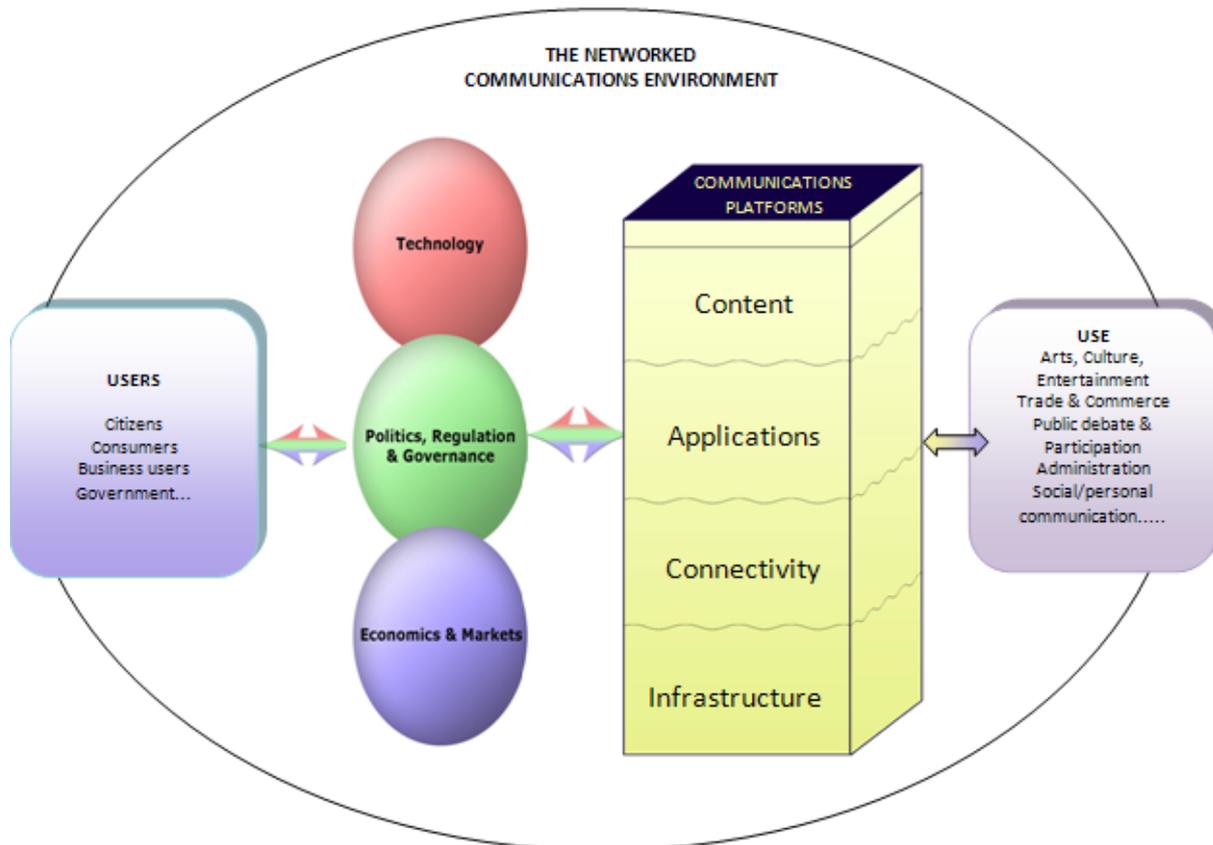
The real prize is the ability to democratise freedom of expression itself, to wrest the platforms of communication from the hands of élites, whether government, business or professional. There will be the same anxieties about this as there were over making the bible available to peasants in the fields: what will they do with the information? how will they interpret it? how responsible will they be? how can we sustain authority in such a world? But as Gutenberg—after a long period of struggle and periodic craziness – ushered in democracies that protected and promoted rights, this networked communications environment can strengthen a faltering democracy movement worldwide.

If this environment is to strengthen human rights it needs to be shaped by human rights principles not only in the content that it generates, but also in the development of the

technologies and applications that deliver this content. For this reason we try to analyse the communications environment as a whole, conceptualised as a series of layers.

### 2.3 A layer model of the communications environment

The Project developed a version of the layer model, often used by information policy makers, to analyse four distinct ‘layers’ in the communications environment: infrastructure, code, applications and content. Policies at any of these layers have implications for freedom of expression and how the environment operates in the public interest.



This model considers the environment in its entirety: all communications platforms, the issues that arise from convergence between them, and the people who use them. It acknowledges that the environment is dynamic and changing fast, identifying three types of ‘drivers’ of change: technology; politics, regulation and governance; and economics and markets. It also recognises the important role of communications media users – for example, they provide a market for certain applications; they innovate and experiment to produce new communications tools and practices.

### 2.4 Principles to guide policy making

We derived the principles by considering international human rights standards and how these are rooted in international governance systems, looking at how the principles could be operationalised in a multi-stakeholder environment.

The principles are grounded in the shared values of:

- **Accessibility:** People have access to the means of communication necessary to participate in public life.
- **Diversity and pluralism:** Content contains a diverse and representative range of information, culture and political opinion.
- **Participatory and transparent governance:** All stakeholders should have opportunities to understand how the environment is structured and governed, and to participate in decision making that affects how it functions and its ability to uphold these public interest values.
- **Openness, creativity and innovativeness:** The environment is enabling, offering maximum opportunities for the development of new technologies, uses, governance structures, knowledge and culture.

The principles address each layer in the layer model. They articulate clear standards against which public policies and their impacts can be assessed, and they are designed to enable analysis of how the communications environment supports or impedes the realisation of human rights and the public interest.

#### **The physical layer**

- a) All people should have affordable and equitable access to the means of receiving and disseminating opinion, information and culture.
- b) Regulation to achieve equitable access should be tailored to local conditions and should be flexible, subject to ongoing evaluation and review.

#### **The connectivity and code layer**

- a) Communications infrastructure and protocols should be interoperable whenever possible.
- b) Protocols governing access to public content should enable access for all people who want and need it.
- c) Networks should be 'neutral' in the sense that the flow of content should not be subject to undue or arbitrary discrimination for monetary, cultural or political reasons. Controls should not be embedded in networks themselves.

#### **The applications layer**

- a) Gatekeepers of content should be transparent about the norms and protocols used to select content.
- b) Service providers should not be held liable for content they help users access.
- c) Companies and organisations with access to user data should adhere to transparent privacy policies that protect privacy rights as established in international human rights law.
- d) People should have access to the means of developing new applications tailored to meet specific needs, for example through open source software development.

**The content layer**

- a) The right to freedom of expression should be protected. The expansive definition of Article 19 of the ICCPR should be used which includes positive rights and associated responsibilities.
- b) The range of content available should be diverse, representing the whole spectrum of cultures, interests and knowledge.
- c) The objective of intellectual property and licensing agreements should be to balance respect for the rights of creators with the need for maximal creativity and innovation.

### 3 The research

The five research projects, carried out during the latter part of 2008, explore communications environments, the extent to which freedom of expression and the public interest are upheld within these environments, and priorities for further research and action. Global Partners & Associates facilitated the research with support from the Ford Foundation. While Global Partners has edited the draft reports for publication, the analyses, conclusions and recommendations are those of the authors.

#### 3.1 About the projects

**Argentina:** The Association for Civil Rights (Asociación por los Derechos Civiles, ADC) provides an exploratory analysis of access to the media and diversity in the media. The report outlines the legal context of the country's media system, and consideration of relevant factors encompasses: the award of broadcasting licences; relations between the media and the state, including the importance of government advertising revenue to the industry; public policies on ICTs; and the costs of access to telecommunications.

**Brazil:** Nupef-Rits, the research centre of the information network for the third sector, analyses potential challenges to freedom of expression in the 'digital city' of Sud Mennucci, where local government is the main internet service provider. It considers affordable access to communications, the neutrality of communication networks, and protection for the right to freedom of expression.

**Indonesia:** Combine Resource Institution, a local knowledge and information systems network, maps the context of communications and media development since the fall of the Suharto regime in 1998. The report considers factors affecting universal access to information, from regulation of business practices to government access initiatives, and the role of community IT activism in the country. It notes specific challenges to diversity of information and freedom of expression both from recent legislation and competing interpretations of religious doctrines.

**Kenya:** Twaweza Communications, an arts and media organisation, explores the use of communications technologies and factors affecting freedom of expression. The report considers factors affecting affordable and equitable access to information, the significance of locally produced content, and the significance of the media in Kenyan life and culture.

**Pakistan:** Bytes for All is a networked space for citizens in South Asia concerned with the relevance of information and communications technologies to development activities. Their report examines priorities for action in the development of the communications environment in Pakistan. It considers how economic, legal and regulatory issues are affecting the development of communications in the public interest in Pakistan.

Full reports and executive summaries are available at [www.freedomofexpression.org.uk](http://www.freedomofexpression.org.uk)

The researchers bring a diverse range of expertise and knowledge, including: human rights, the media environment, the information society, community empowerment through communications technologies, information systems, using ICTs for development, and skills development in the arts, media and culture. Each organisation's research focus and approach has developed from their specific knowledge of their country's communications environment.

While these different perspectives inform and enrich the individual reports, the researchers use a common framework for analysis: the layer model and Principles developed by the Freedom of Expression Project.

The research focuses primarily on two of the Principles:

- All people should have affordable and equitable access to the means of receiving and disseminating opinion, information and culture (physical layer).
- The range of content should be diverse, representing the whole spectrum of cultures, interests and knowledge (content layer).

## 3.2 Concerns in common

The analytical framework has enabled the identification of recurrent concerns across communications environments. This confirms the flexibility and applicability of the framework, and also indicates its potential value for governments, civil society organisations and businesses, for example in identifying opportunities for international collaborations, learning and advocacy.

### 3.2.1 'Traditional' media

The research highlights the **significance of traditional media** in the communications environment. Particularly where ICT infrastructure is not universally developed, access to a diverse range of content via radio, television and newspapers is critical for people's realisation of the right to freedom of expression. The reports address factors that affect **access to the means of communications production** in the broadcasting environment. In Kenya, for example, there is a compulsory registration fee payable for all print publications, which affects community groups. There are few licences available for community broadcasters, and regulations on broadcasting area and sources of earned income present further challenges. Researchers in Argentina explain how the law governing the award of broadcasting licences has effectively excluded non-commercial groups. In Indonesia, the number of community stations has increased dramatically since the legal recognition of community broadcasting, and some stations have pioneered the use of the internet for information sharing and distribution.

### 3.2.2 Infrastructure

Infrastructure development is highlighted as a central issue in achieving affordable and equitable access to communications. While telecoms companies invest in areas of population density, it is a well-established pattern that rural populations remote from large urban centres are much less well served, given the cost of providing infrastructure over large distances – this is the case for all the countries explored in these reports.

The reports highlight the state's positive responsibility to promote access, discussing national policies on delivering '**universal service obligations**' in telecommunications. In Argentina, for example, regulations have provided for a 'universal service tax' on telecommunications operators since 2000 but it has never been implemented 'due to state apathy'. The Indonesian government's universal service programme was enacted in 2003, designed to connect 31,000 villages to the telephone network by 2009 and to the internet by 2015. Yet the programme's funding from operator contributions has been inadequate and there have been repeated delays, with controversies over the transparency of its bidding process. Pakistan's universal

service fund has quickly made progress in connecting underserved areas, a success that the researchers attribute to its secure funding, its private/public partnership model and its acceptance by both industry and government.

Connected to the costs of infrastructure, the reports discuss the **high costs of access** for individuals relative to their income in comparison with the global North. This is particularly the case for the internet. In Argentina, for example, a broadband service costs around 7.5% of average monthly income. In Kenya, the annual cost of an analogue dial-up service is over twice the national per capita income (the regulator's calculation).

Research by Nupef-Rits in Brazil explores a situation in which local government directly provides internet access free of charge, directly seeking to address the issues of access and cost by a 'digital inclusion project'. Yet the administration faces difficulties in doing so, which arise directly from the region's lack of infrastructure: there is no broadband network and no choice of telecoms providers.

### 3.2.3 Access to local language content

The **availability of content in local languages** can present a different type of barrier to accessing the communications environment. While Kenya's national ICT Policy has specific objectives on development of content in local languages, the researchers find comparatively little cultural expression from Africa accessible in the new communications environment. Indonesia has a predominantly verbal culture of communication, a further factor which has not encouraged the availability of content in different languages. Literacy in local languages is also an issue in Pakistan. However, here the researchers also note that the availability of online content in English – the country's official language of business – can provide a motivation for students to learn the language and participate in international communication networks.

### 3.2.4 Markets and regulation

Telecommunications markets in all countries are deregulated, from the late 1990s or shortly afterwards, and reports discuss the role of **competition** in delivering access to communications. While affordability remains a significant issue in Kenya, for example, the arrival of the third and fourth mobile operators in the market has begun to deliver choice and lower SMS tariffs for consumers. Competition between 10 operators in Indonesia has progressively reduced the costs of telecommunications. In Pakistan, a 'light touch' regulatory approach has promoted competition by being supportive of new market entrants.

In the city of Sud Mennucci, Brazil, researchers note that the provision of a free internet service, while commendable, discourages competition and slows down quality improvements. This presents the administration with the technical challenge of increasing local network capacity. At the same time the administration is reliant on one telephone company for its external links, which makes the service vulnerable to outages.

The reports discuss the importance of an effective and **independent regulator**, separate from government and corporate interests. In addition to competition, reports highlight the need for intervention in **business practices**. Regulators in Indonesia, for example, have taken action against six mobile companies that operated a pricing 'cartel', and against one company that

used its market dominance to inflate tariffs. Reports also address the need for regulation on cross-ownership of media and on market share.

The issue of **regulatory convergence** is identified as of critical importance in this developing environment. In Indonesia, for example, telecommunications, broadcasting and information technology are separately regulated, which has resulted in regulatory gaps and overlaps, damaging disputes between regulatory bodies about their authority, and concerns about regulators' independence from government.

### 3.2.5 Relationships between media and government

The reports discuss questions of media independence from government, and the effects of indirect censorship. The report from Argentina discusses how overly close relations have produced anti-competitive practices in the media sector, including restrictions on bidding rights in the cable TV sector, and how public advertising spending is unfairly allocated to media companies and used to influence their editorial positions.

### 3.2.6 Content production

The reports consider the **impact of media ownership and business models** on content production and the diversity of available content. Commercial broadcasters' programming, geared towards maximising advertising revenues and controlling production costs, does not promote the development of diverse, locally relevant domestic content. While Indonesia has a growing TV market, the report notes a potential 'borderline monopoly situation' as many stations are in common ownership, also noting that the majority of entertainment programmes are foreign made. The country's broadcasting law stipulates that national operators must broadcast in partnership with local outlets rather than 'relay' content, but its implementation has been repeatedly delayed. Researchers in Argentina and Kenya also note ownership as a factor that can affect diversity of content, with concerns that it concentrates the ability to communicate in the hands of wealthy individuals and corporations.

Reports from Indonesia and Argentina also discuss other factors. These include the **dominance of urban centres of production**, particularly in models of national distribution of content, which tends to exclude locally produced or specific content. They also include the role of **public service broadcasting** in content production. In Argentina, the state media has no public service mandate in law and a tiny percentage of audience share, and in addition private media are not subject to regulation on the diversity or balance of their content. Indonesia's public broadcasting institution has limited funding, and its attractiveness to audiences is affected by its image as a governmental broadcaster of ceremonial programmes, a perception derived from its role in the New Order regime. However, its reach means that it remains the main source of information for people outside urban areas.

### 3.2.7 Political anxieties

Two of the research teams note in their findings how some interviewees were reluctant to participate in the research and how they voiced **concern about the research**. While assessments to date of Sud Menncucci's digital inclusion programme in Brazil have been broadly positive, the researchers describe anxieties about their initiative which was more independent than other assessments and therefore potentially more critical. Respondents' anxieties extended to late-evening phone calls to researchers, photocopying interview notes and even accusations of collusion with the current administration's political opponents.

Researchers in Kenya note that the ‘novelty’ of the research prompted reactions from excitement to suspicion about a political agenda, and that they had to invest time in winning respondents’ trust.

### **3.3 The impact of local context on communications policy and practice**

While the Freedom of Expression Project’s analytical framework has enabled the identification of common concerns across the countries covered by this research, it has also highlighted the specific political and cultural contexts of these concerns. The reports also acknowledge how particular social norms and values affect how technologies are perceived and used. Work to reform policy to build public interest communications has to take these factors into consideration; there are no one-size-fits-all policy reform measures.

There are long-standing concerns in **Argentina** about the media’s close relationship with political and economic interests. The researchers note that key features of today’s media system derive from a law passed in 1981 by the dictatorial government of Jorge Videla, amended by subsequent presidents. Key issues in this context include the granting of broadcast licences, the allocation of public advertising budgets and the effect of this on editorial independence, the role of the state as regulator and administrator of the media, and the impact of the media system on diversity of content.

The case study from **Brazil** explores the implications for freedom of expression of ‘digital cities’ in the country, through a detailed case study of one example. The research has a close geographical focus, presenting its findings in the context of the specific social and local political cultures. The researchers analyse current local internet usage and the potential of networked communications to transform participation in local democracy; but note that a culture of face-to-face campaigning remains dominant in local politics. They stress the need for deeper consideration of issues raised by the government’s role as internet service provider, and the power imbalances involved. For example: the Municipality took down its own website during a local political campaign, an act of self-censorship to avoid the possibility of any accusations that the incumbent was using it in his re-election campaign. Other concerns include data sharing, data protection, monitoring internet usage, and people’s freedom to voice criticisms of the administration or politicians and to participate politically.

While the issue of infrastructure development is a common concern, the researchers in **Indonesia** describe a specific culture of community IT activism that has developed as a response. Operating outside the law or in grey areas, activists’ technical abilities have delivered low-cost internet access and applications to some communities ahead of the state’s ability to do so.

The social and political context in Indonesia has been one of greater openness since the fall of the Suharto regime in 1998, and this climate has affected both the public understanding of freedom of expression and its exercise. Both in traditional media and the online world, there are visible clashes of values, for example about ‘morality’, and competing interpretations of religious doctrines among communities. In this context, the rise of community vigilantism and new legislation on communications are both posing threats to freedom of expression. Proposed laws on electronic transactions and cybercrime are framed with ambiguous terms on issues of slander, religious intolerance and defamation, while a new broadcasting law is circumscribing the role of the press.

The report from **Kenya** highlights that in some parts of society there are deep anxieties and ambivalence about the spread of communications technologies. Kenyans have embraced the mobile phone, as its rapid growth in penetration shows. However, there are concerns about the social impacts of new technologies, particularly on traditional Kenyan values and family relationships. There are worries, too, about the dominance of foreign content in the media and the influx of ‘cultural pollution’ from the West.

The post-election violence early in 2008 has sharpened concerns in Kenya about regulation of hate speech and standards of journalism, as some radio stations exacerbated ethnic conflicts during that time. The number of local language radio stations continues to grow, and the report reflects interviewees’ sense of the responsibilities attached to journalism in a context of strong ethnic identities.

The report from **Pakistan** notes that freedom of expression is ‘a troubled phrase’ in the country, subject to different interpretations in the light of cultural, religious and social norms. Restrictions on freedom of expression are permitted by the Constitution, for example for the glory of Islam and in the interests of decency. There are critical questions to address in integrating local values with an open, free and democratic communications sphere, and finding the mode of implementation for this.

The political situation in Pakistan, its strategic significance in the US-led ‘war on terror’ and periods of instability in law and order, have combined to heighten concerns about censorship and surveillance in the communications environment. Instability affects infrastructure development, and national security is often invoked to support direct censorship and surveillance activities. These have extended to bans on TV channels, internet blocking, and police being allowed directly to access phone call and SMS data; all of which pose significant threats to citizen’s rights.

## **4 The Principles as a framework for reform**

### **4.1 Reflections**

Based on the research in five countries, we make the following observations about the layer model and the Principles as a framework for analysis and policy reform.

- The framework is flexible and applicable across a range of situations and political contexts. It has produced reports of value to the Project's partner organisations in their analysis, advocacy and partnership building initiatives.
- It has been used effectively by stakeholders with very different expertise within the communications environment, nevertheless identifying some important common concerns. This is confirmation of its potential to support and develop constructive partnerships across disciplines, for example between IT and human rights actors.
- The framework is particularly useful for identifying issues that need addressing in the converging communications environment. Its layered approach promotes consideration of the interconnections between different communications media, rather than considering them separately as silos.
- The framework takes into account the important role of values in policy making. The research suggests that values have a strong influence, indicating the need for dialogue to identify shared values and determine whether these are rooted in the human rights framework. While the framework does not seek to prescribe or impose solutions, it supports the development of policy that balances issues locally while keeping human rights considerations at the centre.
- The principles offer a means of applying human rights standards, via the policy principles, to the complex contemporary issues that have arisen with the internet and digital networked communications.
- The principles provide a window into the state of public interest communications, whilst also acting as benchmarks and standards. But there is also scope for communities to define their own principles to ensure that all issues in the local context are addressed.

### **4.2 Future work**

The framework has proven its usefulness as a tool for analysing policy issues and identifying areas that need attention and debate. The challenge is now to work towards achieving reform in policy and practice – to implement public interest principles.

During the rest of 2009, the Freedom of Expression Project will use this framework in selected focus countries as a means of prompting policy dialogue and multi-stakeholder collaborations for policy reform.

Other areas for fruitful work could include the following:

- Partners may collaborate on common concerns – for example, on initiatives to promote the development and production of local content, or on campaigns for regulatory reform.
- Stakeholders may draw on initiatives undertaken and lessons learnt in other countries to inform their own activities – for example, how to provide municipal internet access while fully analysing its implications and supporting freedom of expression.
- The model may be used to map out issues at the international level and identify possible policy solutions. This could help to bridge the gap between the local, national and international dimensions of the global communications environment.