

# Theorizing policy-industry processes: A media policy field approach

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## Abstract

This article develops a theoretical perspective to study the conditions for media policy formation under the condition of digitalization – the Media Policy Field approach – building on an organizational field approach in combination with theories of policy development. The theory of strategic action fields offers a meso-level view of how actors in media fields interact and how their respective opportunities for influencing policy are structured by the state of the field and their respective positions. This theory is linked with the Multiple Streams Approach, which maintains that change occurs when policy entrepreneurs connect problem, policy and politics streams, and create policy windows. The Media Policy Field approach proposes three analytical foci for the study of current media policy processes: collective frames, incumbent and challenger roles and policy windows. Empirical strategies for pursuing this theoretical programme are discussed.

## Keywords

Collective frames, media policy, multiple streams, policy windows, strategic action fields

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## Introduction

Contemporary processes of media policymaking take place in contexts characterized by increasing complexity. While complexity and the need to manoeuvre strong stakeholders are long-standing traits of media policymaking in national settings (Donders, 2013; Freedman, 2008; Van den Bulck, 2012), these traits become even more prominent under the condition of digitalization and globalization. Due to digitalization, the industry has become unforeseeable in terms of dominant actors, products and which business models will eventually prevail. At the same time, traditional models for policy formation and implementation are challenged by globalization, as national boundaries have become less relevant in an increasingly globalized marketplace (Cunningham and Silver, 2013). Adding to the new complexity is the rise of multistakeholderism as a governmental strategy, especially within the European Union (EU) area, which requires involvement by a large set of stakeholders in policy processes (Donders et al., 2018).

For media policy studies, it seems imperative to find analytical models that can be used to study the new conditions both for the media industry and for media policy. In this article, we develop the Media Policy Field (MPF) approach that combines an organizational field approach, the theory of Strategic Action Fields (SAF) (Fligstein and McAdam, 2012), with the Multiple Streams Approach (MSA) of policy development (Kingdon, 1995). The ambition is to develop a general theoretical framework for media policy studies, which is at the same time particularly apt to grasp the complexity of current media policy processes. A field perspective involves studying change processes, not from the viewpoint of the singular institution but by zooming in on the relationships between actors and organizations and determining how they adapt to the actual or perceived actions of others (DiMaggio and Powell, 1983; Lawrence and Suddaby, 2006). The MPF approach thus de-emphasizes the strategies of singular groups or actors and instead provides a holistic understanding that takes account of the complex set of social, cultural and political processes among public and non-public actors in a field. While there exists a range of studies that demonstrate how media policy processes unfold (see, for instance, Flew et al., 2016; Freedman, 2008; Humphreys, 1996; Levy, 1999; Simpson et al., 2016), including studies taking a stakeholder and advocacy perspective (Van den Bulck, 2012; Van den Bulck & Donders, 2014a, 2014b) and a media ecosystem perspective (Raats and Pauwels, 2013), a theoretical approach to interpret stakeholder relationships and structures beyond the level of specific advocacy coalitions is lacking. In addition, even though existing studies offer valuable insights into various media systems and highlight the importance of institutional structures to national media policy fields (Hallin and Mancini, 2004; Syvertsen et al., 2014), these perspectives are more apt for studying stable national contexts than processes of disruption that are global in scale.

## Presentation of the theoretical bases of the MPF approach

### *The theory of SAF*

Thinking in terms of fields implies taking systems of force relations as the object of investigation rather than the properties of particular substances (Cassirer, 1953). Emanating originally from the natural sciences, the concept of fields also has a rather long history

within the social sciences (Swartz, 2016). Martin (2003) distinguishes between three main overlapping strands: the socio-psychological perspective of Lewin (1951); Bourdieu's concept of fields as social spaces structured around the accumulation and distribution of economic, cultural and social capital and the institutional strand within organizational theory that emphasizes inter-organizational relations (DiMaggio and Powell, 1983; Lawrence et al., 2012; Lawrence and Suddaby, 2006). The SAF approach falls within the latter category but is distinct from the main directions within organizational institutionalism by emphasizing fields as more fundamentally contentious (Fligstein and McAdam, 2011).

Fligstein and McAdam (2011: 2) put forward the theory of SAF as a general theory of social change and stability, where SAFs are understood as the basic units of collective action in society. The theory is closely linked with Bourdieu's concepts of field, habitus and capital in political and social life (Fligstein and McAdam, 2011: 2). A SAF is a

meso-level social order where actors (who can be individual or collective) interact with knowledge of one another under a set of common understandings about the purposes of the field, the relationships in the field (including who has power and why), and the field's rules. (Fligstein and McAdam, 2011: 3)

SAF comprises four aspects, or foundations, for the types of social dynamics that might take place within them. First, actors share a general consensus about what the field is and about what is at stake. Second, actors in the field possess more or less power and are conscious about the power of other actors. Third, there is a shared sense in a field about the rules, that is, the tactics that are legitimate and useful, linked to a certain position. Fourth, different actors in a field might have different frames of reference based on their social position. In particular, the dominant and the dominated, or the challengers and the incumbents, tend to perceive the field differently (Fligstein and McAdam, 2011: 4).

SAF emphasizes competition, strategic cooperation and struggle for power within the field (Johannsson and Kalm, 2015). Conflict and change are imminent to SAFs, and even in rather stable conditions, actors are assumed to be adjusting and 'jockeying' for position. This is particularly true for players in the media industry because this industry is so technology-driven with much uncertainty and high risk (Doyle, 2002; Hesmondhalgh, 2007). The SAF perspective differs from a fundamental tendency in the neo-institutional conception of fields to take stability and 'taken for granted-ness' as basic premises (DiMaggio and Powell, 1983; Thornton et al., 2012). According to the theory, SAFs comprise three types of analytically distinct actors: *incumbents*, *challengers* and *governance units* (Fligstein and McAdam, 2011: 5). 'Incumbents' are strongly influential and dominant actors within a field, and their interests tend to be deeply engrained in how the field is organized, which means that the existing organization and purpose of the field will serve the interests of incumbents in terms of rules, resource flows and shared understandings. Typical examples are media conglomerates, traditional newspaper houses and public service broadcasters. 'Challengers' occupy less privileged positions within the field and usually have little influence over its operation. Even though challengers often conform to the existing order, they might still formulate alternative visions about how the field could function. Whereas commercial broadcasters represented challengers in the 1980s and 1990s, online news providers and digital intermedia (i.e. Facebook, Twitter

and YouTube) represent some of the challengers of today. Finally, ‘governance units’ are entities that are charged with overseeing compliance with field rules and making the system function. Often, such governance units will be marked by the influence of the historically most powerful actors in the field, and they can be expected to defend the status quo. Media Business Associations and Journalist Unions are two examples of such governance units.

In trying to understand the field dynamics of either stability, gradual change or rupture, Fligstein and McAdam (2011: 7) emphasize the role of ‘social skill’, defined as a ‘highly developed cognitive capacity for reading people and environments, framing lines of action and mobilizing people in the service of these action “frames”’. Social skill thus consists in being able to develop frames that resonate with different groups, either rationally or emotionally, and that can serve as tools for mobilization. Within media policy fields, public broadcasters’ success in framing their institution as central to achieve core democratic goals, such as plurality and equality, is an example of such skill (see, for example, Syvertsen et al., 2014; Van den Bulck and Donders, 2014b). SAF hence underscores the collective and symbolic aspect of human interaction (Fligstein and McAdam, 2012: 16).

Social skill is necessary for individuals and organizations that operate within the field, and their degree of success and ability to change or maintain the field according to their interests will depend on it. In other words, individuals and organizations within a SAF attempt to interpret their context and the intentions and understandings of others, and mobilize frames that could make other actors adhere to their cause. In a stable environment, it might be easy for incumbents to evoke established collective frames; however, when a SAF is in a crisis, it might be easier for challengers to define new ways of thinking about goals and practices (see, for example, Brüggemann et al., 2016).

Finally, a SAF must always be understood within the web of relationships with other SAFs. For instance, the newspaper and television fields meet to compete for audiences, advertisers and, to a certain extent, industry professionals. In times when one of these fields struggles, it is likely to have spillover effects on neighbouring fields. Fligstein and McAdam (2011, 2012) make a distinction between ‘proximate’ and ‘distant’ fields, ‘vertical’ and ‘horizontal’ fields and ‘state’ and ‘non-state’ fields. The state is considered a dense collection of subfields that may be characterized by different degrees of proximity and verticality in relation to the SAF in question. This means that, even though states possess a strong power to ensure or disrupt the stability of non-state fields in modern societies, the influence of the state might be complex and characterized by internally conflictual demands (Fligstein and McAdam, 2011: 8). The dilemma is easily illustrated in the many debates on public service, where newspaper publishers have lobbied for cutting the funding and remit of public service institutions, which they see as unfair competition, especially in the online environment (Barwise and Picard, 2014; Brüggemann et al., 2016; Nielsen et al., 2016).

The SAF perspective presents an interesting approach to study change in media policy fields from a systems perspective, and to take account of how actors at the meso level strategically act and adjust their actions in relation to other actors within the media field. In addition to offering a framework to describe various actor roles and power through the lenses of incumbents and challengers, SAF also offers specific tools to discuss how different

states of a field produce different conditions for different actors, through distinguishing between episodes of contention and periods of settlement. Finally, the SAF framework is apt for discussing the effects of exogenous shocks and field ruptures.

To use SAF to study changes in media *policy* in particular, however, we need to combine this framework with theories that discuss policymaking processes specifically. SAF does not conceptualize the complexity of the policy system and processes, and the relationships between the field and the policy system. Here, MSA offers a coherent theoretical lens through which to explore policy formation and the conditions under which policy may change.

### The MSA

The MSA has been one among several dominant approaches within policy research since it was first developed in the 1980s (Ackrill et al., 2013; Kingdon, 1995; Zahariadis, 2007) and can be conceived as belonging to a broader literature centred on how ideas are forged into policy (Cairney and Jones, 2016: 39). The MSA emphasizes how the framing of ideas through social processes shapes political possibilities and determines how ideas become solutions to policy problems. In the original coining of the perspective, Kingdon (1995) took Cohen et al.'s (1972) garbage can model as his point of departure to describe policymaking processes characterized by ambiguity and complexity: policymakers always compete for attention because they operate under significant time constraints, and they often have to make their choices before their preferences are clear. Moreover, the processes involved in selecting policy solutions are often imperfect because of lacking information and oversight (Cairney and Jones, 2016: 39). As a consequence, framing a policy problem and a given solution in ways that gain attention and that seem viable and efficient is key to promoting policy change.

The MSA framework contains five structural elements: problems, policies, politics, policy windows and policy entrepreneurs (Zahariadis, 2007). Policy processes are considered to emanate from three separate streams: the problem stream, the policy stream and the politics stream, and policy change takes place when these streams are connected. The *problem stream* consists of conditions that either policymakers, citizens or an industry or organization wants addressed. Examples related to the media policy field could be the problem of waning incomes from newspaper subscriptions in the wake of digitalization or the problem of ensuring pluralism in news production. Policymakers might become aware of problems through either feedback from public systems, research, public debate or various ways such as focusing events that stakeholders attempt to put a problem on the agenda. At any given time, however, policymakers are exposed to multiple problem streams and different problems, and stakeholders fight for attention as policymakers experience overload. This overload might result in inertia or a selection of simple – rather than complex – problems. In this process, the framing of a problem is crucial in terms of urgency and accessible solutions (Cairney and Jones, 2016: 40; Zahariadis, 2007: 32–33).

The *policy stream* is based on a 'primeval soup' of ideas that compete for acceptance in policy networks (Zahariadis, 2007: 33). Policy communities and networks consisting of bureaucrats, academics and experts are crucial in directing attention to selected ideas

within this ‘soup’ and to assess them through hearings, papers, seminars and so on. Through such processes, ideas are reworked, and while most ideas never make it to the policy level, some are selected for further consideration, often based on technical feasibility, value acceptability and resource demand. Policy communities and networks might be very different in different national or subfield contexts, and may thus vary in their degree of internal competition, integration, capacity and access to policymakers.

Finally, the *politics stream* is composed of three elements: ‘the national mood, pressure group campaigns, and administrative and legislative turnover’ (Zahariadis, 2007: 34). When choosing to which problems and policy solutions to pay attention, policymakers are attentive to inputs and pressures emanating through public debate and the news media. An example of such a national mood could be the strong attention given to ‘fake news’ in liberal democracies in the wake of the 2016 US Presidential election. This input is balanced towards the ideological basis of the political party and towards the party’s aims. According to Zahariadis (2007), the most powerful effect on agendas is exerted by the combination of national mood and turnover in government.

Following the MSA, policy choices and policy change occur in cases where the problem, the policy and the politics streams are combined in critical moments and termed *policy windows* (Cairney and Jones, 2016). In other words, concurrence is needed between (1) a problem being singled out as important, (2) a viable policy solution to the problem and (3) pressure on politics either from the inside or the outside to make a change (see also Herzog and Karppinen, 2014). Policy windows are most likely opened up by compelling problems or by events in the political stream. Whether policy change actually takes place in concurrence with such windows depends on the skill and manoeuvring of *policy entrepreneurs*. Policy entrepreneurs are individuals or organizations that pursue their goals as power brokers, coalition enablers and manipulators of problem definitions and policy solutions (Mintrom and Norman, 2009; Zahariadis, 2007: 35). The power and position of such policy entrepreneurs could depend not only on the character of the policy community but also on their particular access to policymakers.

## The MPF: A combined approach

The MPF approach makes use of the strengths of SAF and MSA, to forge a holistic understanding of current changes in media policy fields. Both approaches take a cultural view of social change that depends on shared definitions of what are important and valuable aims and what are viable tools to reach those aims. Both perspectives also acknowledge that change proceeds through complex processes, where actors manoeuvre strategically to pursue their interests. Each perspective thus provides sophisticated analytical tools that make them particularly valuable for analysis of media policy-industry processes in times of change, and that can be usefully combined.

One central contribution of the MPF approach is to give input into what is required for individual or organizational actors to promote change processes, by emphasizing the combination of policy entrepreneurs (MSA) and social skill (SAF). The MSA model of policy change emphasizes the role of ‘policy entrepreneurs’, that is, actors both inside and outside of government, who seek to promote change (Kingdon, 1995; Mintrom and Norman, 2009). Policy entrepreneurs are characterized by the ability to combine the problem,

policy and politics streams, and possess the analytical and communicative ability to frame the relationship between specific problems and policy solutions. For example, in a situation where digitalization is thought to threaten the diversity of media content, incumbent media actors could frame the problem as the weakening of traditional media. Such a problem definition could be accompanied by the suggestion to increase subsidies towards these actors to give them the leeway to innovate (for a recent study on frames of the newspaper 'crisis', see Brüggemann et al., 2016). This specific problem definition might therefore lead to a policy solution that would bolster the capacity of traditional media rather than support a range of emerging new actors.

The MSA's understanding of what characterizes political entrepreneurs resonates well with the SAF framework's emphasis on *social skill*, a cognitive capacity to scan and interpret the environment, and to devise collective frames that serve to galvanize support for a given cause (Fligstein and McAdam, 2011: 7). Within SAF, social actors always act strategically, even in highly stable situations. The crux of the argument is that different social and political situations enable and promote different types of strategic behaviours from different kinds of actor's positions. For example, a stable situation favours incumbent actors, who will use their social skill to maintain and reproduce the status quo. However, an un-institutionalized SAF allows more leeway for 'institutional entrepreneurs' that may broker new collective identities and offer new solutions to a given set of problems.

SAFs are expected to be characterized by institutional path dependence. Path dependence (i.e. the fact that the choices characterizing one period limit future options and shape later choices) occurs as a result of feedback mechanisms through which actors gain increasing returns for behaving in ways that are consistent with their past action (Pierson, 1993, 2000). However, the problem with path dependence explanations is that they are better suited to explaining the persistence of policies than their transformation. In our framework, policy entrepreneurs play a crucial role in creating opportunities for change. Still, policy changes will be constrained by the institutional structure of the field as well as by past policy decisions.

Based on these insights into the importance of policy entrepreneurs and social skill drawn from SAF and MSA, one of the main advantages of the MPF perspective is that it provides a nuanced and theoretically informed view of the 'policy stream', that is, the stream where policy communities and networks work to connect problems with policy solutions. According to Fligstein and McAdam (2011: 11), SAFs tend towards one of three states: unorganized or emerging; organized and stable, but still changing incrementally, and organized and unstable (field crisis). For each of these states, Fligstein and McAdam (2011, 2012) provide a set of hypotheses about how the SAF will be structured, which types of actors will be important and powerful and through what sorts of social processes. For example, stable SAFs show a well-established role structure of incumbents and challengers, and instability will be met by attempts to reinforce the status quo. Challengers are vulnerable in such SAFs, and main strategies can consist of building niches and taking advantage of the crises of other challengers. Incumbents seek to reinforce the policy definitions that serve them, and might otherwise seek to co-opt challengers (Fligstein and McAdam, 2011: 14). On the contrary, SAFs that experience a crisis, based on, for example, invasion from outside actors or changes in state policies and resource flows, open other opportunities for both incumbents and challengers. Incumbents

will still seek to maintain the status quo and often turn to the state as a focus for action. For challengers, there is a possibility to redefine the field, but this requires that they are able to propose a new collective frame for the field that may encompass a broad range of actors (Fligstein and McAdam, 2011: 18).

## **MPF applied to media policy formation in a contemporary setting**

The MPF perspective allows conceptualizing the interactions between the policy system and its processes on the one hand and the dynamics of the industry field and the ways these dynamics influence the different policy streams to produce potential policy changes on the other. While such an analytical approach could be useful in the study of various industries and policy processes, we argue that it is particularly apt for studying crisis and periods of contention in complex fields. Media policy formation in the current era, which is widely understood as a period of crisis and disruption, presents one such case.

At a general level, the MPF perspective states that underlying any field is a set of collective frames that define the aims, the relationships and the rules. In periods of field crises, such collective frames become objects of contention, where incumbents and challengers are mobilized and play different roles. In this situation, various actors will try to construct frames that suit their cause and to define themselves as part of the solution, either as innovators or as those who can ensure stability. However, for such strategies to succeed in terms of changing *policy*, actors must be able to create a policy window, where given problems are linked to specific policy solutions and correspond to the general political climate.

For the specific study of the conditions for forming new media policy in the current situation of field crisis, the MPF perspective suggests a set of concrete analytical tools to unpack policy dynamics, linked to (1) collective frames, (2) incumbent and challenger roles and (3) policy windows. In the following sections, we describe and exemplify how these analytical terms could serve as roadmaps for a study of change in media policy, by using the recent actions taken by the EU towards Facebook (as well as other global, digital super players) to illustrate our arguments. These EU actions include a broad set of initiatives and regulations on data protection, hate speech, taxation and competition issues (see Rankin, 2018; Satariano and Schreuer, 2018).

### *Collective Frames*

Under the pressure of disruptive change, both the shared understanding of the rules of the field and the interpretive frame that actors in the field mobilize to make sense of their actions are expected to change and become increasingly contested. New forms of action might gradually gain legitimacy, and established ones may become illegitimate. New frames might emerge as the result of innovation, or the different established action logics and interpretative frames that have currency in the field may evolve because relative positions in the field are transforming. For instance, in many of the ongoing media policy debates of today, national incumbent media players promote a collective frame in which global, digital players such as Google, Facebook and Netflix overtake positions previously



held by national institutions to such an extent that their democratic function is threatened (Newman, 2018). In the beginning, this frame was closely linked to the erosion of incumbents' advertising models; however, it soon embraced more overreaching societal issues linked to data protection, taxation and competition issues – as rhetorically put by one of the EU lawmakers questioning Zuckerberg in the 2018 Facebook Brussel meeting: 'Are you in fact a genius who creates a digital monster that is destroying our society?' (Verhofstadt, quoted in Rankin, 2018) or as another EU lawmaker claimed in the same meeting: 'I think it is time to discuss breaking Facebook's monopoly, because it's already too much power in one hand' (Weber, quoted in Waterson, 2018). On the side of policymakers, such a nationally oriented frame may be easy to adhere to because (1) the policy goal that media should have a democratic function is well established, and (2) there is a lack of alternative frames and national entrepreneurs that could forge alternatives. Although global, digital companies such as Facebook have tried to launch alternative collective frames to highlight the democratic function of their services, so far, these frames have been overruled by the nationally oriented frames.

Empirically, the emphasis on collective frames supposes to investigate the different action logics and action frames that have currency in the field and to trace their transformation and the emergence of new ones. Such frames might be detected through oral and written discourse, and in media text and policy documents. Frames should be studied as always positioned and linked to clusters of actors, and with a view to their impact.

### *Incumbent and Challenger Roles*

The SAF approach considers that the field is composed of a set of actors possessing more or less power to the extent that they control more or less resources, occupy a general position in the field and share a sense of their position relatively to other actors. In addition, the power structure of the field may be built on different mixes of coercion (when a dominant actor or coalition of actors controlling valued resources impose the rules of the field under threat of withdrawal of these valued resources), competition (when actors struggle for resources) and cooperation (when actors make alliances to provide and control valued resources).

Whereas in a settled field, the power structure is relatively stable, one expects that in a disrupted field, the power structure will be changing and unstable, and that incumbents will come under the pressure of increased competition from challengers. Exposed to the common threat of transforming environments and the entry of challengers in the field, incumbents might cooperate to a greater extent and build new political coalitions or restructure existing ones to secure material and 'existential' resources. Previous studies on advocacy have shown that Flemish and Scandinavian public service institutions have been successful in constructing broad coalitions and alliances that reach outside of the realm of broadcasting, for instance, by highlighting these institutions' social responsibility and value for the democracy (see, for example, Syvertsen et al., 2014; Van den Bulck and Donders, 2014b). Cooperation and collective action are expected to be mobilized in two directions: (1) as a means for gaining competitive advantage against challengers (e.g. by pooling resources for developing innovations to meet challengers' disruptive technology) and (2) towards the policy system to obtain policy changes that preserve

established actors' positions against challengers. However, challengers might find the opportunity to present new collective frames and to provide new innovative solutions. For instance, the collective frame of the 'global threat' unifies different types of national incumbent media institutions in a common defence in such a way that both public and private broadcasters as well as traditional newspaper companies join forces to promote common policy solutions to similar problems. In the Facebook example described above, incumbent media companies across Europe pressured policymakers to change legislation in order to make Facebook and other global, digital players pay more tax and contribute to the markets which they collect values from (Rankin, 2017). However, disruption in the media market (nationally and internationally) might also allow for challengers – online news providers, digital video producers and social media companies – to contest traditional policy regimes and ask for neutral legislation and liberalization. On the side of media policymakers, giving ear to incumbents' calls to protect established policy solutions and privileges might seem a rational and legitimate path in a situation where challengers are mainly defined as global actors.

Empirically, studying incumbent and challenger roles entails mapping the actors and their relative position as well as the mix of coercion, competition and cooperation characteristics to the field and their transformations over time as a result of disruption. Qualitative and quantitative network methods could be used for this purpose, as well as qualitative interviews and document analysis.

### *Policy Windows*

Within the MPF framework, individual and collective policy entrepreneurs play a central role in creating a linkage between the actors of the fields and the policy system, connecting the three streams constitutive of the dynamics of the policy system and taking advantage of the opening of a policy window. For challengers, the potential for changing media policy is highly dependent on the ability to mobilize coalitions around new collective frames. To protect their established position, incumbents might need to modify their policy by reinforcing existing collective frames. However, incumbents will often have advantages over challengers because, typically, they have developed skills and competence for mobilizing broader coalitions within the industry and with policymakers. Public service broadcasters have proved particularly successful in forming coalitions and defining collective frames, and several studies have shown that these institutions have managed to form rather stable and long-lasting coalitions in support of state intervention and specific definitions of what constitutes a good society (Donders, 2013; Van den Bulck & Donders, 2014a, 2014b).

In the past decade, where digitalization and globalization have emerged as a major challenge to national media industries and to media policy, the lack of new policy solutions has led to an apparent impasse among media policymakers because of an absence of policy windows. While incumbents have forged protective rather than innovative solutions to the problem, the main global challengers such as Facebook and Google have been beyond the reach of national legislation and policymaking, and hence, no policy solutions were available. Notably, a policy window might be opening given the current changes in the policy and politics streams. The EU's initiatives to, and partial success in,

regulating the activities of Facebook, in the domains of data protection and tax rules, are examples of new policy ideas that could be viable (Rankin, 2017, 2018). This partial success coincides with renewed, critical attention to the modes of operation of these global super players, which are accused of abusing their power and distorting the public sphere (Galloway, 2018; Thompson and Vogelstein, 2018). This change of mode might be seen as a fundamental change in the politics stream. As claimed by *The New York Times*, 'European authorities have emerged as the world's most assertive watchdog of the technology industry' (Satariano and Schreuer, 2018).

The empirical study of policy change requires focus on four components of the policymaking process as outlined in the MSA. First, at the level of the *problem stream*, the empirical task will consist of identifying which problems are made salient, how these salient problems are framed and which fields' actors and coalitions stand behind the different formulations of salient problems. Second, relative to the *policy stream*, the empirical investigation will be concerned with not only the nature of policy solutions that are put forward by different coalitions and actors but also the degree of acceptability of these solutions. Third, regarding the *politics stream*, the empirical analysis will inquire into the ways the problems are perceived by the public, politicians, political parties and other interest groups. The media field has particular features as compared to other policy fields since its actors control the media and exercise 'a media power' that they can mobilize to influence the opinion and the politics stream.

Finally, empirical attention should be given to the task of assessing whether a *policy window* has been opened by policy entrepreneurs and to the nature of the results obtained by these entrepreneurs in terms of *policy outcomes* and changes. This will entail, methodologically, the reconstruction of the sequence of events leading to a given policy change. Starting with a policy change, such an approach will typically involve mixed-methods, including text analysis of media content and policy documents, interviews with the main players and possibly structural (network) analysis of the field, in order to retrace the dynamics of the different streams and their coupling by one or several policy entrepreneurs into a policy window.

## **Conclusion: The potential of the MPF framework**

In this article, we developed a theoretical perspective to study the process of media policy formation and implementation, the MPF. Using the perspectives of SAF and MSA, we stressed the importance of identifying certain cognitive models – or frames – crucial to social and political change, and we determined how these are defined (and acted on) by different types of actors. We argued that the MPF framework fills an analytical gap in the media policy literature by providing a systematic and holistic view of policy change through organizational interaction, with an explicit theory of power and strategic action. This combined approach has the benefit of recognizing how and why players with economic power and in dominating market positions often prevail in policy processes. The MPF is also a framework for understanding how smaller and 'newer' market players can re-negotiate a field in times of change, by re-defining problems, constructing strategic alliance coalitions and using the available policy windows. Although previous studies of stakeholders and advocacy coalitions (Donders and Raats, 2012; Van den Bulck, 2012;

Van den Bulck, 2014b) and multiple streams and frames (Herzog and Karppinen, 2014; see also Brüggemann et al., 2016) give valuable insights in to these processes as well – particularly regarding key players, arguments used and outcomes – they tend focus on particular media policy cases and fail to explore the implications of their findings for media policy formation as a whole. Furthermore, previous processes are often single- or small-case oriented, whereas our perspective has the ambition of being supra-national (see, however, Brüggemann et al., 2016).

One apparent challenge with MPF is to bridge the more overall theoretical perspective to a methodological and empirical model for studying media policy formation. In this article, we have outlined an empirical roadmap as a starting point, emphasizing the need to study collective frames, incumbent and challenger roles and policy windows. However, the task of identifying apt methodologies to study field dynamics remains a challenge. In their treatment of this question, Fligstein and McAdam (2012) emphasized that the SAF perspective is not locked to a particular methodology and that approaches may vary depending on the specific research problem, and the epistemological underpinnings of the research. For example, research that seeks to establish general mechanisms for the formation of fields from a positivist standpoint might want to employ quantitative techniques in a set of cases to study network structures and structures of diffusion of frames (Fligstein and McAdam, 2012: 178). Research that wants to study change processes and dynamics in a specific field from a realist standpoint might, on the contrary, want to make use of more historical and qualitative approaches, combining interview data with observation and text analysis (Fligstein and McAdam, 2012:192).

The analytical framework that we have developed here is, like the SAF perspective, not necessarily linked to one or the other research methodology. Nevertheless, we would argue that the MPF calls for processual and historical studies, and for the use of a combination of methods. A particular methodological challenge may still be to move from the study of singular policy processes to large scale policy processes. Even though such methodological challenges remain, we ultimately believe that a holistic analytical framework, such as the one outlined herein, is an important and necessary step in defining research focus when studying complex phenomena.

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