

International Journal of Digital Television
Volume 4 Number 3

© 2013 Intellect Ltd Article. English language. doi: 10.1386/jdtv.4.3.299_1

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Policies for the development of digital terrestrial television in Argentina

ABSTRACT

Following the ups-and-downs of the selection of the digital TV standard, in the second half of 2009 Argentina decided to take the same path as Brazil, and adopted the Japanese-Brazilian standard. Since then concrete policies and actions have been introduced to implement Digital Terrestrial Television (DTT). Three years into the process, it is possible to put this into perspective and analyse the virtues and deficiencies of DTT deployment in Argentina. This article is intended to focus on the public policies introduced by the Argentine State both in the deployment of the necessary infrastructure and in the stimulus to content production. What is special about the Argentine case is the leading role of the State.

KEYWORDS

analogue
digital
television
policy
regulation
Argentina

1. INTRODUCTION

This article analyses the development of Digital Terrestrial Television (DTT) in Argentina three years after the selection of the Brazilian Japanese technical standard for transmission. The aim is to explain the impact of DTT policies on the audio-visual sector as a whole.

The process of transition from analogue to digital TV not only enables improved transmission and an increase in the number of channels but also entails a profound restructuring of the power of television, its players, partnerships and hegemonies (Bustamante 2003a, 2003b). Digital television involves a reconfiguration of the modes not only of production but also of distribution and consumption. It is a transmission system that consists of the processing and coding of audio and video in a flow of binary data that can be distributed over various networks. The greatest highlight in this technical innovation is its economic effect, as it increases the cost-effectiveness of the support, the multiplication of supply, and interactivity, thus bringing new forms of consumption that depart from linear reception, and support the expansion of content delivered on demand (Prado and García 2003; Prado 2010a, 2010b; Igarza 2008).

In Latin America, and Argentina is no exception, the sector has historically had a remarkably commercial structure with private providers, the absence of public service (though all countries have state-run media that are closely aligned with the information interests of the government), and a fluctuating intervention of political power in news content (see Fox and Waisbord 2002; Waisbord 2010; Becerra et al. in print). The advent of DTT has caused a series of changes in the audio-visual ecosystem, with variants depending on the policies implemented in each country.

The operation of digital television depends to a large extent on its deployment process. In this case, we shall review the process of DTT implementation in Argentina from the perspective of the political economics of communication, with a special focus on the articles that have analysed the intervention of the State in the formation of the media markets (Garnham 1990; McChesney 2004).

A point worth considering in the Argentine case is that the State assumes a leading role in the implementation of DTT that is expressed not only at a regulatory level but also through strong investment in infrastructure, subsidizing universal access and promoting content production. This leading role also implies control in defining who can access the public platform. In the meantime, so far, traditional private broadcasters have shown little interest in investing in this technology.

2. DIGITAL TELEVISION IN ARGENTINA

DTT appeared on the public agenda in Argentina in 1998 with the untimely adoption of the North American ATSC technical standard. However, this did not lead to any action to implement the system and, subsequently, the technical choice was revised (for an extended development, see Krakowiak et al. 2012; Bizberge et al. 2011).

In 2006, during Néstor Kirchner's administration (2003–2007), the discussion process to select a standard for DTT was reactivated. In September of 2009, President Cristina Fernández de Kirchner announced the adoption of the Japanese-Brazilian system based on Japan's ISDB-T standard and set 2019 for completing the digital switchover. The following period after the adoption of the standard has been characterized by the introduction of the

Argentine Digital Terrestrial Television System (*Sistema Argentino de Televisión Digital Terrestre* (SATVD-T)), based on a communication policy that is in clear confrontation with the main multimedia group (Clarín), and having the State-operated TV platform as its main banner (for a detailed explanation of the confrontation, see Marino et al. 2010). The standard selection was made without consulting the existing private broadcasters.

Our analysis of the DTT implementation process in Argentina that started three years ago will be based on the theoretical concepts of *access* and *participation*, inherited from the NOMIC debates (see, Mastrini and de Charras 2005; Moragas 2005). Both concepts are enshrined in the Universal Declaration of Human Rights, adopted by the United Nations in 1948, but was at the UNESCO meeting on 'self-management, access and participation in communication', which took place in Belgrade from 18 to 21 October 1977, that the scope of each term was clarified (UNESCO 1977: 4).

Access is defined in terms of the opportunities available to the audience to choose varied and interesting programmes, and to obtain a feedback medium that allows sharing their reactions and demands with production organizations. In terms of choice this consists of: the right of every individual to have access to communication content, the right to hear or watch your favourite programmes when you want and where you want; the availability of a wider range of content, chosen by the audience, rather than being imposed by production organizations (informative and educational materials, services and different programmes); and the transmission of content requested by the audience. While in terms of feedback, access involves: interaction between producers and audience; direct participation from the audience during the transmission of the programme; the right to raise comments and criticisms; and to have the means to be in touch with producers, managers and directors from communication organizations.

Participation implies a higher level of public involvement in communication systems. It takes place at different levels: production, decision-making and planning. At the level of production, participation involves: unfettered opportunities for the audience (individuals or groups) to produce programmes and have access to professional help; and providing the public media and technical equipment and production resources. At the level of decision-making, participation implies public intervention in: programming, content and length of programmes, programming schedule; and the direction, managing and financing from the communication organizations. At the level of planning, participation includes the right of the public to collaborate in: the formulation of plans and policies for media companies: defining the objectives, principles of management and future programming; and the formulation of national, regional and local communication plans.

From these concepts, the role of the State is analysed in defining the regulatory framework for the audio-visual sector in general and DTT in particular, as well as investment in infrastructure, subsidy for viewer access and the promotion of production content.

3. THE REGULATORY FRAMEWORK FOR THE DIGITAL TRANSITION

In terms of regulation, both laws and decrees referring to broadcasting that were passed during this period set parameters to ensure access to digital technology, with the guidance of the State which is increasingly involved not only in the administration but also (following Bustamante 2003a, 2003b) in a mix

of roles as Manager of public resources and Instigator. In J. M. Salaüm (1989), the author explains that there are three main roles of the State: as a manager of the production and diffusion of cultural and communication products (whether it is as a monopoly or in competition); as instigator of the market or civil society activities through direct or indirect support and its contribution to the establishment of social representation that helps to create the demand. Last, the author refers to the State in its role of controller to set the conditions for operation by the social agents.

Weeks after the adoption of the DTT standard, in October 2009, Congress passed the Audiovisual Communication Services Law (*Ley de Servicios de Comunicación Audiovisual*) No. 26.522, designed to reorder the structure of electronic media.

The objective of the new audio-visual law was to promote the access of new players in the system in a clear attempt to limit the power of Grupo Clarín, the main multimedia group in the country. In spite of the fact that the new legislation is correctly grounded and its contents entail a potential step forward in the organization of the media system, it leaves the issue of convergence unresolved, as this is not articulated with the DTT policy. The Audiovisual Communication Services Law fails to solve specific points regarding the new digital technology, rather, it provides general lines of action stated in articles 46, 47, 92 and 93. Article 46 refers to 'non-concurrence', specifying that DTH and mobile TV licences are not cumulative with other licences, except in the case of DTT. Article 47 mentions the 'adequacy to new technologies' requiring the bi-annual preparation of a report to review the system of multiple licences and non-concurrence among them to keep pace with technological change. Article 92 dictates that the Executive Branch will determine the entry of new technologies that are not currently in operation.

Finally, article 93 deals with the transition to digital services, and states that licence holders must maintain the rights and obligations agreed at the time of obtaining their licences under the terms and conditions set forth in the National Plan for Digital Audiovisual Communication Services. However, the Law does not specify any deadline or authority for drafting such Plan. For the time being, the plan is informally adjusted by means of a series of decrees and resolutions. The same article indicates that the full frequency channel for digital transmission during the simulcast period will not be computed under the multiple licence system, i.e., it is considered a non-cumulative licence. At the same time, the law mentions the need to reserve a portion of programming on the new digital technology for the inclusion of 'content of universal scope' (without specifying what they would be like). Furthermore, it mandates that, after the analogue switch-off, the digital dividend will be used for new services, although it does not specify what kind of services these could be.

The specific regulations for DTT were set by means of presidential decrees, which make it clear that the discussion was not subject to parliamentary debate but a decision of the Executive Branch. This shows the importance that the government assigns to the digitization of TV, with the aim of strengthening its communication plan. Thus, the emphasis is on the role of the State as Manager.

In late 2009, the regulatory authority cancelled the allocations that had been made in the 1990s for Channels 22, 23, 24 and 25 of the UHF band to private codified TV operators and reallocated the frequencies to the National Public Media System, for the implementation of DTT (COMFER Resolution 813/09).

On 15 March 2010, the government, through Decree 364/2010, declared the National Platform of Digital Terrestrial Television to be of national interest,

and designated *Empresa Argentina de Soluciones Satelitales S.A.* (AR-SAT) as the company responsible for guaranteeing the signal transmission services and the related links for developing, implementing and operationalizing the infrastructure. A year later, by means of Decree 835/2011, the government also assigned to AR-SAT the role of infrastructure (multiplex) operator.

Article 5 paragraph F of Decree 364/2010 empowers the Advisory Council to prepare the National Plan for Digital Audiovisual Communication Services (mentioned above in relation to article 93 of the Law). So far, no official presentation has been made with regard to this point. Drafting this plan is essential to set the rules of the digital playing field. Taking into account that most private operators have made very little headway in terms of digital TV deployment, preparing this plan is of the utmost importance, while there is still time to break the historical trend of development of broadcasting in the country, whereby the market has been first allowed to act, and then the rules have appeared after the fact. That is, there is a historic opportunity to change the dynamics of the digital environment (Mastrini 2008).

Later on, on 19 July 2010, Decree 1010/2010 was introduced as a key step in signal transmission, because it empowered *Radio y Televisión del Estado* (RTA) to make experimental digital TV transmissions with its own signals or through third parties, as long as they were made available for free.

One of the main criticisms of the decree was that it enabled the introduction of private cable signals, as well as new private broadcasters in the broadcast digital TV grid, disregarding the requirement to make a public call for bids in compliance with Law No. 26,522 for the transmission of TV signals. The experimental nature of the process and the need to have as much content as possible available at the launch of DTT transmissions were some of the arguments proposed off-the-record. The methodology used by the government enabled signals which belonged to businessmen from the inner circle of the Fernández de Kirchner administration to be transmitted on the digital platform, nationally broadcast, violating the Audiovisual Service Law requiring that signals have local reach. Thus, an advantageous situation was created for certain cable signals that accessed the broadcast TV space on the digital platform. The State-run channels (both free to air and cable) also joined the DTT offer. More recently, pre-existing private channels, including Canal 11 and Canal 13, have been also brought on board.

The reaction of Grupo Clarín, one of the the leading broadcast TV station in terms of audience in Buenos Aires City, was to slow down the upload of its signal to the digital television platform. On the contrary, it took advantage of its dominant position in the cable TV sector – it has a market share exceeding 49 per cent out of the 80 per cent household penetration at a national level – to transmit, exclusively to its subscribers and in high definition, the signal of its main broadcast TV channel, Canal 13. It was a commercial and political response designed to impair the DTT system. The other audience leader in Buenos Aires area is *Telefé* (owned by Telefónica Spain), which did not speed up the upload of its digital signal to the digital platform either.

In both cases, these were licences granted in late 2010, when AFSCA (the broadcasting regulator authority) authorized private Channels 13, 11, 9 and 2 based in the federal capital to use UHF Channels 33, 34, 35 and 36, respectively, for experimental DTT transmissions (AFSCA Resolution No. 327/2010). This resolution has set a precedent that forestalled the government's decision to deliver 6 MHz to each licensee operating in the analogue environment. Even though it is a trial period, other usage options should be considered when it

comes to making a final decision, in order to allow the access of new players. So far, private broadcasters have not shown much interest in the deployment of DTT. They merely claim to maintain the availability of the 6 MHz channel and to use the signals received to launch satellite signals as transmission tests. Their lack of interest could be attributed to the fact that the 80 per cent of households of the country receive pay TV (its programming line-up includes the transmission of free to air TV channels), which is why digital TV impact is still small in terms of audience.

Furthermore, AFSCA allocated DTT frequencies to 43 national universities (Resolution 687/2011), to Buenos Aires City and to fourteen provinces (Resolution 689/2011), in compliance with the restructuring of the radioelectric spectrum and the Audiovisual Communication Services Law. These services have not yet started transmission.

In June 2011, AFSCA called for bids for the awarding of licences to provide terrestrial audiovisual communication service (STDTV) over a digital channel. Resolution 685/2011 indicated that licences would be awarded to individuals or legal entities, both for-profit and not-for-profit. In 32 zones, between 4 and 8 licences would be put up for bids, always divided in equal portions between for-profit and not-for-profit awardees. The high cost of the terms and conditions document and monthly fees to be paid to AR-SAT for the signal multiplexing and transmission service was criticized by nonprofit associations, which were short of financial resources to take part in a competition which, for the first time, had some room reserved for them.

Finally, competitions were suspended by Resolutions 929/12 and 930/12 in July of 2012, in face of the absence of interested parties or organizations that met the requirements and could afford the costs stated in the terms and conditions. Although at the time that the call for bidders was suspended, it was established that it should be reannounced in 120 days, a year after the suspension the government has still not relaunched the tender. The cancellation of the competition is proof of the major hurdles faced by the government to support a coherent communication policy within a legal framework.

From the review of the regulatory frameworks, it can be seen that the general regulation for the audio-visual sector (Audiovisual Communication Services Law) discursively encourages the entrance of new players in the market. However, the specific decrees for DTT show the predominance of the State in administrative and management roles and players from the inner circle of the government are the ones transmitting content for the digital system. The suspension of the contests is evidence that, despite a discourse of democratization, the process has not promoted the entry of operators associated with non-profit organizations as required by law and this does not seem to be the priority for the government in the short term. The changes promoted by the government on the media players' map in the digital scenario are related to the transmission of cable signals on DTT, belonging to the State or to business people from the inner circle of the national government.

At the same time, it can be noted that the spectrum allocation historically attributed to audio-visual services will be used for telecommunications. Article 4 of the Audiovisual Communication Services Law refers to the notion of 'digital dividend', meaning the benefit from the higher efficiency in the use of the spectrum to be provided by an enhanced convergence of services. This generic definition does not make clear whether the spectrum freed on the UHF band would be allocated to radio broadcasting or audio-visual communication services, whether it would be assigned to other services,

such as broadband or mobile telephony, which are typical of telecommunication services, or, as a third option, would be divided in segments to take full advantage of the two types of services. Nevertheless, Decree 2426/2012 has clearly stated that the government's position was in favour of granting the digital dividend to mobile telecommunication services. Article 6 instructs the Communications Secretariat to make the necessary arrangements to allocate the bands comprised in 1710-1755, 2110-2155 MHz and 698 to 806 MHz exclusively to terrestrial mobile telecommunication services.

Therefore, the admission of new players to the spectrum is dependent on the wider policy on connectivity through the AR-SAT platform, reinforced by Decree 2627/2012, which has declared the development, implementation and operation of the 'Federal Wireless Network' of national interest, in the framework of the National Telecommunications Plan called 'Argentina Conectada'. AR-SAT is in charge of the transmission of 'digital resources and content' to federalize networks and equipment and to enable the participation of non-incumbent players in the sector that guarantee the circulation of general-interest and high-quality content. Additionally, it states that the Federal Wireless Network will help meet the connectivity demand of all digital inclusion policies, including DTT.

Based on the above considerations, it is possible to infer that the infrastructure policy has a high profile. Even though there are other instruments, such as the above-mentioned promotion of federal content, and the requirements of the Audiovisual Communication Services Law establishing a parameter for diversity, there are open questions about how the entry of the new players will be implemented, and how they are to achieve self-sustainable projects beyond any state support.

4. DTT DEPLOYMENT: TRANSMISSION TOWERS, DECODERS AND CONTENTS

In parallel with the definition of regulatory frameworks, the government made progress in the implementation process, in order to ensure DTT transmission and reception in the national territory. To that end the Planning Ministry prepared a three-pronged strategy: investment on transmission towers, subsidization of converters to capture digital signals, and promotion of content production. According to the classification of access and participation explained at the beginning of the article, it can be said that the governmental strategy focuses mainly on the access (to infrastructure and decoders) and, lesser extent, on the idea of participation through content production programmes that, so far, have had low ratings.

4.1. INFRASTRUCTURE

On 21 April 2010, Canal 7 was the first DTT signal with regular transmission. The state-run station transmitted from a transmission tower donated by the Japanese government. The signal only had an approximate reach of 60 km, covering the Federal Capital and part of the Buenos Aires suburbs, and very few households received it because there were scarcely any digital TV sets or converters capable of adapting the signal to the old analogue sets. On 30 March that same year, the government released the details of its investment plan aimed at widening coverage, by announcing the construction of 47 towers to guarantee potential coverage for 29 million inhabitants, 75% of the country's population. The initial objective was to finish them by the end

of the year and to extend coverage to 95% of households (the remaining 5% would be covered by satellite TV). However, the project fell behind schedule for several reasons, such as the difficulty of transferring the land to locate the antenna sites. 2010 concluded with the commissioning of eight transmission plants, and in December 2012 a total of 67 transmission towers were commissioned in the rest of the country, potentially providing coverage for 82% of the population.

4.2. DECODERS

The government designed a plan to promote universal access to set-top boxes. The initial goal was to distribute for free 1.18 million set-top boxes among the most vulnerable sectors. The government determined that eligible recipients of free decoders were the beneficiaries of social welfare plans and non-contributory pensions, pensioners with minimum pension benefits, nonprofit organizations, cooperatives and educational institutions. Decoders included in the free distribution plan are not mere zappers but enable unlimited interactivity between the remote control and the device. Additionally, specifications for national manufacturing of the devices included a USB port to establish Internet access in the event the decision is made to install a return channel by physical link (Bizberge 2011).

Until late 2010 approximately 200,000 devices had been delivered, and between 2011 and December 2012 the figure raised to 1.08 million, according to the Digital TV Council statistics. The late delivery of converters and the low sales of DTT receivers in the market were mainly due to delays in extending the reception area of the device, and little interest in this technology at a time when the content offer was still thin. In late 2010 a broader offer appeared, reaching 31 signals in December 2012, of which 23 are received in Buenos Aires city, while the rest only have local reach in certain provinces.

Another issue that impacted the slow dissemination of DTT among the population is the very high penetration of cable TV, with a multi-channel offer that does not stimulate migration (approximately 80 per cent of households receive cable TV). According to preliminary data from the Argentine Digital TV Impact Study, despite many survey respondents indicate they are satisfied with the DTT offer, 'cultural' barriers have been observed in connection with high levels of loyalty to cable TV due to the switchover cost. Furthermore, some of the survey participants that were willing to change the system encountered signal reception problems in their regions. Another barrier has to do with political prejudice (if it comes from the government, I don't want it), and ignorance of the existence of the migration process, among other factors.

4.3. CONTENT

Investment in infrastructure and the subsidizing of set-top boxes was supported by the introduction of a plan to encourage the strengthening of training, production and dissemination of audio-visual media and to stimulate the audio-visual industry, articulating the stakeholders in the transition to digital TV. This is another step that needs to be taken in the implementation process because the history of TV shows that one cannot conceive of content diversity as an automatic consequence of the multiplication of channels (García Muñoz and Larrègola 2010). The official plan contemplates different actions marked by one common trait: a commitment to a more federal kind of production, opposed to the historical centralism in Buenos Aires city.

The official plan to subsidize content could be related to the first level of participation which, according to UNESCO (1977) implies: unfettered opportunities for the public (individuals or groups) to produce programmes and access to professional assistance; and providing the public media and technical equipment and production resources. Official plans set out below help to illustrate this.

Operating Plan for the Encouragement and Promotion of Digital Audiovisual Contents: This programme includes national contests for the production of content for digital TV, with the National Filmmaking and Audiovisual Arts Institute (*Instituto Nacional de Cine y Artes Audiovisuales* (INCAA)), National University of San Martín (*Universidad Nacional de San Martín* (UNSAM)) and the National Inter-University Council (*Consejo Interuniversitario Nacional*, (CIN)). In the first edition of the contests, held in 2010, financial support was granted for 100 short films, twenty fiction series and seventeen documentaries, which were premiered on the State-run channel, Canal 7. In 2011, the first edition of the 'Prime Time Competition' was held, and several fiction series were produced, some of which were premiered in privately managed TV channels of Buenos Aires City, Canal 9, América TV and Telefé. In 2012, the second edition of the Prime Time Competition included high-quality, full HD fictional series for digital TV. The call for proposals was targeted to broadcast TV stations as well as production companies partnering with broadcast TV stations.

Audiovisual Technology Hub Program (Polos Audiovisuales Tecnológicos): This is a long-term programme whose goal is federalizing production, with the aim to promote equal opportunities and decrease the asymmetries across provinces and regions of the country. To that end, a network of production hubs was created, breaking down the country in nine regions, with the involvement of National Universities, jointly with the different players of the audio-visual sector and some civil-society organizations in their areas of influence.

Digital Audiovisual Content Bank (BACUA, by its acronym): This is a digitized network designed to encourage the exchange of audio-visual contents in the country. Those who wish to contribute their materials to the audio-visual content bank must assign their content for free, so that it can be distributed over the channels in the network. This point has created controversies with copyright managers. The bank's catalogue mainly comprises materials produced by the different players that take part in the Promotion Plan and the Hubs Program.

Universal Content Tree of Argentina (Árbol de Contenidos Universales Argentino, (ACUA)): This initiative seeks to create productions for three specific areas: content for senior citizens (*ACUA mayor*), music (*ACUA música*) and productions from cooperatives, community broadcasters, film-making schools and institutions throughout the country (*ACUA Federal*). Of the three segments, signals for senior citizens and for the federal construction of identities have been launched to date.

Open Digital Content (ODC): This is a platform that operates on a video-on-demand basis, free over the Internet, using set-top boxes and integrated digital television. The platform is fed with the productions that won the Audiovisual Promotion Programme and other stakeholders in the audio-visual sector.

In addition to the above-mentioned initiatives, Decree 1528/12 has granted audio-visual, digital and film-making content production companies of public, private or mixed ownership the rank of industrial production activity, thus making the benefits of this sector available to them. This measure demonstrates acknowledgement of the importance of the economic role

played by the cultural industries. While on the public platform the State and pro-government private operators broadcast, the proposal for content subsidy aims to provide appropriate conditions for production by new audio-visual players in areas where there was no development. However, in practice we can mention at least three problems:

1. The awarded content that results from the contests are supplying the BACUA (the digitized network designed for the exchange of audiovisual content in the country that was mentioned above as one of the official plans). It provides all the production for free to the channels with which it has agreements, including commercial private stations in the city of Buenos Aires that currently broadcast in digital public platform. Therefore, the State subsidizes content produced by existing industry, which is able to pay for the productions
2. Other productions that receive governmental subsidies cannot find screens to broadcast
3. Content produced so far has had low ratings.

Even though DTT promises a scene of wider plurality by reducing the scarcity of frequencies, the degree of diversity to be achieved by Argentina's audio-visual media is not yet clear, due to the narrowness of the advertising market in 'analogue' mode. Indeed, the traditional media system is already finding it hard to afford operating costs (Becerra 2010). For the players of the media system and the political stratum it is indispensable to consider how the production of digital content will be funded beyond the state's help.

5. CONCLUSIONS

Almost four years after the DTT standard was selected, and more than three years after the first transmission of the state-run channel was made, there are some certainties about DTT implementation.

What is special about the Argentine case is the leading role of the state in defining the regulation and the implementation of SATVD-T (*Sistema Argentino de Televisión Digital Terrestre* in Spanish or Argentine Digital Terrestrial Television System), which is already a reality and is transmitting digital contents.

The notions of access and participation are the guiding principles for the Government, but its reach is limited. The State helps to create the market, but with an implicit policy that promotes the granting of more presence to those contents that are aligned with its agenda. This has been achieved by assigning preliminary licences to transmit DTT without a public call for bids, thus making continued broadcasting by those channels dependent on the official will. And though it is true there have been delays in the schedule that had been set for the construction of transmission towers and the free distribution of set-top boxes, major progress has been made, particularly taking into account that the analogue switch-off is scheduled for 2019.

A similar push is seen in content production. Regional hubs have been built, and fiction series and documentaries have been subsidized. However, in practice it can be observed that the financing of the content is taken primarily by commercial private stations and other productions – also subsidized by the State – still cannot find screens to broadcast. The State cannot fund all new entrants for a long time. Several civil society organizations and community-based media have

not given up their expectations to enter the TV market, even though it is not yet clear what economic model will enable sustainability.

For their part, the large private operators place their stakes on getting a full multiplex in order to maintain the status quo, but without alternative proposals for the digital environment: it is not clear if they are interested in multi-programming financed by advertising or a mix of free to air and pay signals and/or broadcasting in HD. So far, the only concrete plan is to incorporate the private commercial operators related to the government in the public platform. That allows them to take part in a distribution platform with almost no additional cost to their analogue transmissions. Besides, in a country where pay TV has 80 per cent of households penetration and most of the free to air broadcasters are part of multimedia groups with interests in pay platforms, it is natural that they have little interest in the migration process for DTT.

Broadly speaking, the process of DTT deployment in Argentina can be said to have marked, together with the Audiovisual Communication Services Law, a significant shift in audio-visual policy-making, in which the State has played a leading role over the private sector, as part of a transition process spearheaded by state-run TV. However, the government has shown institutional ambiguity in the decisions made, lack of coordination among the different authorities involved in the matter, and a questionable distribution of DTT resources to businesspeople aligned with the government's agenda, without implementing public bidding processes to legitimate those actions.

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