Language Difference and Communication Policy in the Information Age

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This study argues that language difference is an important, though often neglected, element in contemporary flows of audiovisual media and organizations’ efforts to influence them through policy. Because linguistic issues overlap a number of policy areas, including trade, culture, language, and communication, this study advocates for increased attention to language-related concerns within and across those areas by policymakers and researchers alike. Various developments associated with globalization have contributed to the significance of the transnational media trade, and are discussed in light of language difference. Special emphasis is given the handling of language in media by the European Union and North American Free Trade Agreement, two trade regimes that have treated language difference distinctly. The probable expansion of both trade regimes is likely to increase the salience of linguistic diversity among participant societies in the future.

Keywords  audiovisual media, cultural policy, European Union, free trade, international media flow, language diversity, language policy, media policy, North American Free Trade Agreement, regionalization, trade policy

This special issue concerning new directions for communication policy appears at an important transitional moment in the evolution of public policy for international electronic media. Free trade regimes have been operating in multilingual regions for more than a decade and are poised to expand, yet proper balancing of economic and cultural facets of communication goods and services remains at issue. Regulatory oversight for international communication continues to migrate from national governments to supranational organizations at a time when policymaking struggles to keep pace with rapid changes in markets and technologies. New communication technologies carry a broader array of media content and bring important efficiencies to language translation. This article argues that language difference influences the character and outcomes of these consequential developments.

Due to its close ties with identity and nationalism, language has long been a sensitive policy area for governments. The broad influence of language on individual as well as collective human experience is reflected in the distribution of language-related rules across several policy areas. I argue that this distributed nature of linguistic policy concerns has obscured the importance of language difference from the view of policymakers and researchers alike at a crucial time. Contemporary developments in cultural identity, trade, technology, and media growth are rendering transnational processes more complex, and linguistic issues more significant. My goals herein are to elucidate the language difference problem in the audiovisual media trade, and encourage policymakers and researchers alike to address it with greater vigor and understanding.

Given the importance of language in collective identity, nation-building, and nationalism, it should come as no surprise that language policies vary across nations and are considered central to a society’s cultural sovereignty (Hobsbawm, 1996). Yet countries’ use of cultural policy and communication regulations to shield their symbolic environments, cultural industries, and national sovereignty from outside influence is an increasingly difficult enterprise as deregulation and free trade expand, and barriers to the importation of foreign language media become more permeable. Neo-liberal economic reform has tied many nations more closely to the global economy while simultaneously reducing the level of government influence over communication markets and the international policies intended to govern them (Ó Siochru & Girard, 2002). In a number of countries this has occurred through formal deregulation and the privatization of state-controlled media; in others, commercial media have gained influence through laissez-faire approaches. Language difference in media remains a sensitive and sometimes explosive issue.
at a time when many national governments cede ever more regulatory influence to multilateral organizations and some are under growing pressure from local and subnational constituencies to cede them greater political, economic, and cultural (including linguistic) sovereignty.

**LANGUAGE AND MEDIA POLICY**

For centuries, texts originally produced in nonnative languages have circulated societies in translated form. The resulting competition between translations and native texts has long created controversy and influenced the regulation and function of communication industries (Simon & St.-Pierre, 2000). The problems related to language difference compounded with the first real-time electronic medium, the telegraph, and have grown more complex with the development and diffusion of each successive communication technology. A significant gap exists between our ability to produce and disseminate communication messages and to translate them efficiently and effectively. This has led some observers to identify language difference as the final barrier to fluid cross-national communication, an argument that Ferguson (1992) identified as one of the “myths” of globalization. This article will demonstrate that language difference is a multifaceted obstacle to more fluid communication that calls for a combination of industrial, technological and policy responses.

As Clare Mar-Molinero (2000, p. 83) points out, policy decisions affecting language have emanated from multiple origins, just as the policies and politics of language have influenced other policy areas. Of particular relevance to language difference in electronic media are policies concerning trade, language, culture, and mediated communication. Trade policy has received increased attention since the 1980s due to growing interdependence among economic systems and governments’ efforts to facilitate international trade flows by removing regulatory barriers and improving coordination among those structures that remain (Milner, 2002). A parallel acceleration in the development and application of new communication technologies has opened economies around the world to greater influence from exogenous forces as many countries have liberalized their trade policies in conjunction with the “rush to free trade” (Rodrik, 1994). Such economic change has created new cultural tensions, and/or exacerbated existing ones, as differing forms of political, economic, and social organization collide. Language has been contested in trade policy in culturally sensitive sectors such as education and mass communication. The 1993 GATT negotiations stalled, in part, over media imports to Europe; protecting linguistic sovereignty in the non-English-speaking European nations was among the concerns (Verón, 1999; De Witte, 2001; Beale, 2002). Similar rifts may be expected to occur in the 21st century as free trade conflicts with systems of cultural practice and representation grounded in different languages while technological advances continue to increase the means for distributing content.

Governments employ cultural policies to promote and protect artistic expression in their societies. The term “cultural policy” is slippery for two reasons: It applies to differing values and assumptions regarding culture’s relationship to artistic expression, industry, development, education, and identity, and it is articulated and applied in diverse political contexts. Diana Crane (2002, p. 13) identifies three common goals of cultural policy: protecting a country’s culture from outside domination; creating and maintaining international images of a country; and developing and protecting international markets and venues for international exports. Clearly there can be considerable variation—and disagreement—concerning the proper scope and function of cultural policy within societies, especially diverse ones (e.g., recurring debates in the United States concerning public funding for controversial art exhibits). Variation also exists among nations: Whereas in the United States support for noncommercial cultural production, especially “high culture,” has been left largely to elites and corporations (Crane, 2002), in most European countries national governments establish and fund cultural policies. Official languages are protected and promoted through cultural policies that often cover a broad gambit including mass media as well as the arts in both the commercial and non-commercial sectors (Schuster, 2002). Linguistic minorities target cultural policy as they advocate for greater influence and access in cultural expression using their languages (Hourigan, 2003). I should note that many Latin American nations share Europe’s disposition toward cultural policy and language, but lack the will and/or resources to pursue the policies as vigorously.1

Traditionally, language policy has concerned extending the use of a national language and protecting it from external influences. These goals were closely tied to the nation-building efforts of many Western societies in the late 18th through the 19th centuries, and newly independent states from the middle of the 20th century forward (Hobsbawm, 1992). Increased emphasis on linguistic rights in law and policy since the Second World War has rendered this a volatile subject in many societies. Thus, the integration of linguistic minorities to mainstream society through political and economic participation, education, and various social institutions remains a key concern of language policy, yet those same areas have often constituted the fault lines on which minority groups challenge the state’s authority. With the growth of communication systems, and especially audiovisual mass media, linguistic integration concerns have overlapped with communication policy and cultural policy as nations have codified rules governing language use in media.2 This carries important internal...
implications for the inclusion and representation of minority language speakers in national discourses and cultural production (Hourigan, 2003), as well as external implications concerning national industries’ competitiveness in export markets and controlling the importation of foreign-language media (Collins, 1994). Because these interlaced policy areas are articulated and engaged at the local, national, regional (e.g., European Union), and global (e.g., World Trade Organization) levels, they are complex, and difficult to analyze systematically. Such intricacy accounts, in part, for the paucity of research synthesizing language policy issues in media. Before attempting to unpack the most salient of these complexities I offer an abbreviated review of existing research on language difference in transnational media to provide historical grounding and underscore my argument that policies focused on trade, culture, language, and communications overlap in transnational media processes.

Ithiel de Sola Pool (1977) was among the first scholars to explore how cultural and linguistic elements affect audience preferences for cultural products, and thereby the configuration of transnational media markets. He argues that cultural markers in media texts such as food, clothing, customs, and language combine with media’s broader social functions to create complex webs of audience preferences, which media producers endeavor to understand and accommodate. Straubhaar (1991) takes this notion a step further by emphasizing “cultural proximity” in shaping local demand for endogenous as well as exogenous media products. He maintains that audience preferences are influenced not only by a text’s fit with cultural traditions, but also by the reception process, in which socioeconomic class plays a key role. In a study examining how audiences’ cultural and economic capital impacts television flows Straubhaar (2000) states, “cultural proximity is based to large degree in language” (p. 202), and “language is a critical element of cultural capital” (p. 206). I explored the connections among culture, language, and commerce in a study of the international trade in Spanish- and Portuguese-language television programs (Wilkinson, 1995), and Sinclair (1999) theorizes such trade in light of economic and technological developments at century’s end. Sinclair identifies a key dynamic in these broad processes: “The drive for global economies of scale, a force towards homogenization, is attenuated by the heterogenising factors of language and culture” (2000, p. 28). Such tension between economic forces of homogenization and cultural–linguistic tendencies toward heterogeneity lie at the heart of struggles over globalization and constitute a principal opposition underlying the factors driving policy developments I discuss next.

Several important contributions to this field have taken economic perspectives on cultural–linguistic differences in international media. Wildman and Siwek (1988) see Hollywood’s preeminence in international television deriving from a competitive advantage gained through access to lucrative English-language markets as well as ample financial resources. Hoskins and Mirus (1988) emphasize the historic audience maximization efforts of U.S. producers that lead to lower “cultural discounts” against U.S. media products than those originating elsewhere. The diminished appeal to audiences of exogenous cultural products limits their market value, and leads distributors to reduce prices so as to compete more effectively with local and regional productions. This is a market strategy that U.S. companies have long pursued. We must keep in mind that English-language advantage has its limits, as “accents or idioms may still cause problems” (Hoskins et al., p. 32). Richard Collins (1994, p. 386) identifies culture and language as resilient “differentiating factors” in media markets even as cultural–linguistic communities transgress national boundaries through processes of globalization. He takes the English advantage argument a step further by maintaining that third-market media buyers prefer Angophone products to other languages because of their familiarity to audiences and their “translatability.” Collins concludes by stressing the importance of policy: “The continuing convergence and interdependence of media content and carriage suggests that software characteristics, notably language and culture, will become more and more important foci for communications policy” (1994, p. 396).

A decade after Collins made his assertion, policy research constituted a significant gap in the literature concerning culture and language in media markets. This is a troubling omission, given the influence of policy on the structure and function of international communication markets (Ó Siochrú & Girard, 2002; Raboy, 2002). Compounding the problem is the nebulous position of language across public policy areas that have experienced rapid change in the late 20th and early 21st centuries. Raboy (2002, p. 5) maintains, “A global media system is developing according to its own logic, requirements, protocols and rules.” Other political, economic, and social changes are occurring simultaneously which combine with media system growth to complicate the status quo and thereby challenge policymakers. Obviously some reductionism is required to keep the discussion of complex, interrelated transnational processes manageable. My goal is for the reader to attain a clearer comprehension of the principal factors driving contemporary policy developments, especially those carrying implications for language difference in audiovisual media.

Since the nation-state system took hold in many Western societies beginning in the 18th century, the multifaceted nature of human identity has become more apparent, if not easily discernable. During the 20th century, historic tensions between local/regional identity and national unity
were released through processes of decolonization, independence movements, codification of universal human rights, and responses to globalization, among other factors. Rapid advancements in transportation and communication facilitated intercultural contact as well as people’s construction and enactment of complex identities. Smith (1992) argues that pan-nationalism was not possible before the advent of mass communication. Hutnik (1991, p. 20) elaborates: “With rapid modernization, technological advance, and increased mobility, it is now possible to choose one’s ethnic identifications in a self-conscious way. Most people have multiple group affiliations that may be emphasized or minimized according to the situation.” Such situational ethnicity (Padilla, 1985) is closely related to Anderson’s influential notion of imagined communities (1983) and challenges efforts at national identification and integration as people engage different identity attributes at the sub-national and supranational levels. This is not to suggest that nations are dissembling through a wholesale forfeiture of national identity and cultural sovereignty, but that national unity is under pressure, and governments often respond through policy.5 Language is among the key factors constituting identity and, like other attributes, is used in situational fashion. Language use shapes power relations in the political/ideological realms (Fishman, 1972; Phillipson, 1992), the economic arena (Lamberton, 2002), and cultural relations. In media, language use encompasses all three areas of power relations and may be manifest at the subnational level (Hourigan, 2003), the national level (Burgelman & Pauwels, 1992), or the transnational level (Phillipson, 2003). Political actors at each level employ policies directed at trade, culture, communication, and, of course, language to advance their interests. A development of common concern among many political actors and interest formations across levels and categories is the spread of English as a lingua franca (Crystal, 1997). We have already reviewed the competitive advantages that accrue to media industries producing in content English. Add English’s expansion as the principal language of transnational commerce as well as a common bridge between minority languages, whether in spoken or mediated form, and we begin to capture the scope of the “Global English” problem for non-Anglophone societies (Phillipson, 2003). It should come as little surprise that these concerns run deep, given the close association between language use and identity together with the tendency by many to equate globalization with Americanization (Ferguson, 1992).

Macro-level changes in economics and trade are revealed by increased interdependence, neo-liberal economic reforms, and the streamlining of trade through supranational entities like the Organization for Economic Cooperation and Development (OECD) and World Trade Organization (WTO). Some nations are also ceding a measure of fiscal sovereignty by adopting common currencies such as the European euro. Cultural industries have been treated distinctly by nations and trade organizations, as revealed in the discussions of the European Union and North American Free Trade Agreement (NAFTA) that follow. The proper balance between culture and commerce in audiovisual media industries, and how to attain it through policy, has been interpreted and acted on in distinct fashion as processes of privatization and deregulation have deepened commercial influences over media in many countries. The neo-liberal mandate that countries specialize their economic activities in sectors where they enjoy competitive advantages raises sensitivities regarding cultural production and language use, both of which are central to national identity and cultural sovereignty (Schlesinger, 1991). Policy responses have appeared at different governance levels, sometimes with the intent of coordinating across levels. For example, France led the effort to exclude cultural industries from the 1993 GATT agreement while actively promoting similar restrictions at the European Union and in national policy. (Recall that protecting linguistic sovereignty in the non-English-speaking European nations was a motivating factor [De Witte, 2001].) Thus policy measures can serve a variety of orientations simultaneously: provide trade protectionism at the national level, support a supranational industrial policy (such as Europe’s effort to diminish imports while fostering more intra-regional trade in media), and create market conditions favoring the production and export of content by a particular media industry and/or in a specific language (e.g., France’s efforts to develop a stronger international Francophone market).

A third factor driving change has already come to the fore in 21st century communication policy research: the shift of regulatory oversight from national governments to supranational organizations such as the NAFTA, EU, WTO, and International Telecommunications Union. The contributors to Raboy’s volume (2002) offer compelling evidence that communication regulation function is migrating to the transnational level. The shift supports the common notion that as globalization advances, national governments cede increasing power over processes affecting their societies to transnational corporate interests and supranational organizations (Ferguson, 1992). Hurley and Mayer-Schönberger (2000) concur in arguing that some national governments have engaged more cooperative relationships with other governments, supranational organizations and transnational media concerns in their efforts to better manage the complex transborder communication environment. Yet Ó Siochráí and Girard (2002, p. 127) remind us that movements of communication governance to the supranational level will be tempered by the fact that “nations jealously guard their sovereignty.” Thus a dynamic tension exists between relinquishing some power over policymaking to supranational organizations and
the desire to maintain political, economic, and cultural sovereignty, all of which are intimately related to communication processes. The triangular relationship between national governments, supranational organizations, and transnational corporations engages the interplay among policy areas discussed earlier, and requires closer consideration by researchers.

Another important factor influencing language difference in media has been rapid technological change and policymakers’ efforts to keep pace with it. Due to the accelerated pace at which new communication technologies are being introduced, diffused, then superseded by new new technologies, there has been a tendency to focus on the present and future while ignoring the past. Beniger’s concept of control technologies (1986) asserts that technological innovation and obsolescence are cyclical processes: a fact that could aid policymakers, and the researchers who inform them, in their daunting task of keeping up. Policymakers representing a range of interests from municipalities to global organizations endeavor to implement effective technology and information policies even as the distinctions among content types and communication industry sectors blur through convergence processes. Machines’ ability to manipulate language much more effectively looms as an important policy consideration. If language barriers in transnational communication come to constitute a “crisis of control” (Beniger, 1986), the computer-based technologies of machine translation, translation memory, voice recognition, and voice synthesis, among others, will come to play more direct roles in facilitating mediated as well as interpersonal communication across languages. Indeed, computers are already assuming a central role in language transfer for electronic media (O’Hagan & Ashworth, 2002), and some argue that they are poised for broader applications in direct interactions between speakers of different languages (Murray, 1995).

This brings me to a final factor driving policy developments, the growth of media industries and expansion of transborder media flows, what Appadurai (1990) calls the mediascape. Concerns over cultural-linguistic difference have heightened in the push to economic globalization facilitated by media. Digitization has increased many societies’ capacities to produce and distribute—as well as import—audiovisual media, while economic and trade reforms have opened new communicative spaces, including linguistic ones in which various dubbed sound tracks or subtitled languages are available to accompany the same visual text. We must keep in mind that the size and cumulative wealth of linguistic groups continues to govern the reach and characteristics of such linguistic spaces at the transnational level. There have been examples of well-heeled minority language groups “exporting” their audiovisual products to the national level, such as the case of Catalanian telenovelas (O’Donnell, 2000), but these remain isolated phenomena. Supranational industrial policies such as the European Union’s, and cultural, media, and language policies of nations, like Canada, try to manage both the trade balance in media and the nature of images and ideoscapes (Appadurai, 1990) circulating within their borders. I should stress the point that policy is frequently used as a double-edged sword to protect a home market (or markets) from economic and cultural competition from the outside while simultaneously projecting a government’s own political, economic, and cultural interests abroad through the media. It is a difficult weapon to control due to its capacity to cut in both directions.

This discussion has highlighted the integrated nature of cultural and linguistic factors with economic ones in the international media trade. It has also revealed the interactions among four policy sectors and identified contemporary factors driving policy developments influencing language use in media. This diffuse position of language in the function and regulation of transnational media renders difficult the task of clarifying linguistic components of media governance. To advance the clarification process, I examine how language difference is being treated in two regions that are engaging the issue in distinctive ways as they negotiate closer trade relations.

LANGUAGE AND MEDIA POLICY IN EUROPE

The European nations are linguistically diverse, and are attentive to matters of cultural identity, nationalism, and language. This renders Europe an interesting case for policymaking regarding language difference as well as an important example for other world regions as they move toward closer economic and cultural relations. Luyken et al. (1991) identify Europe as a regional market fragmented into 9 principal linguist regions, with an additional 30 languages spoken by 1 million people or more. Such linguistic diversity challenges the establishment of a vigorous intraregional trade because language transfer (i.e., dubbing and subtitling) has traditionally occurred between English and a target language or between the most widely spoken European languages. Hence language transfer is at the center of efforts to bring less populous and/or less media productive nations into the fold.

The European Economic Community (EC) seeks to integrate nations of the continent through a common market for goods, capital, and services, and easing restrictions on the cross-border movement of people. The EC discovered that some entities crossed borders more easily and with less controversy than others. De Witte (2001, p. 249) explains:

It gradually became clear, mainly through the case law of the European Court of Justice, that there was no neat
separation between economy and culture, and that the economic-sounding concepts used in the EC Treaty could affect cultural goods and activities in so far as these had an economic dimension, which they frequently have.

This tension is akin to the cultural and economic dimensions of audiovisual products discussed earlier, and is manifest in competing policy objectives of encouraging market integration through free trade on the one hand, and of respecting and promoting cultural diversity on the other. The general concern for cultural diversity is the foundation for protecting linguistic diversity in the region.

On May 1, 2004 the number of member states in the European Union grew to 25 from 15, and the number of official languages to 20 from 11 (Greek will be used for Cyprus). Thus the EU nearly doubled the languages it must conduct its business in so as to comply with Regulation No. 1 of 1958 stipulating that communications be available in the national languages of all member states. Diversity alone does not ensure that the new languages have equal influence within the Union, however. The principal languages are English, French, German, Italian, and Spanish, with Danish, Dutch, Finnish, Greek, Portuguese, and Swedish constituting smaller language groups. The national and worldwide reach of these languages is reported in Table 1. The ten nations that joined the EU in May 2004 are Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia and Slovenia. Three other nations, Bulgaria, Romania and Turkey have also applied; upon their entry Bulgarian, Romanian, and Turkish would become official EU languages. The expanded membership will, of course, complicate the challenge of developing a fluid regional communication market. I should also emphasize that the use of nonofficial minority languages within many nation states further complicates the situation.

A European Council directive of 1989 entitled “Television Without Frontiers” stated the Commission’s goal of developing an inclusive regional market for television:

The Directive aims to ensure the free movement of broadcasting services within the internal market and at the same time to preserve certain public interest objectives, such as cultural diversity, the right of reply, consumer protection and the protection of minors. It is also intended to promote the distribution and production of European audiovisual programmes, for example by ensuring that they are given a majority position in television channels’ programme schedules. (http://europa.eu.int/scadplus/printversion/en/lvb/l24101.htm)

Advocating such a fluid, participatory market is different from achieving it, of course, and the problem of close ties between language and economic power presents a considerable obstacle. How could the transcontinental diffusion of minority-language cultural products be enhanced while limiting the “cultural discount” imposed through the translation necessary to render them intelligible? In a study of television fiction in smaller European nations, Biltereyst (1992) assessed the European Community’s efforts to establish a regional television market through the imposition of quotas on imported programs as well as other measures. He noted significant differences between countries falling under the “linguistic sphere of influence” of one or more major European countries, and those lacking such close linguistic ties. Thus, fiction produced in France occupied ample airtime in francophone areas of Belgium and Switzerland. In contrast, Denmark, Greece, the Netherlands, and Norway broadcast high percentages of locally produced material. The

<table>
<thead>
<tr>
<th>Language</th>
<th>First-language speakers in hub country (in millions)</th>
<th>First-language speakers worldwide (in millions)</th>
<th>Second-language speakers worldwide (in millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>German</td>
<td>75.3 (1990)</td>
<td>100</td>
<td>128</td>
</tr>
<tr>
<td>French</td>
<td>51</td>
<td>77</td>
<td>51</td>
</tr>
<tr>
<td>Portuguese</td>
<td>10</td>
<td>176</td>
<td>15</td>
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<tr>
<td>Italian</td>
<td>55</td>
<td>62</td>
<td>n/a</td>
</tr>
<tr>
<td>Greek</td>
<td>9.9 (1986)</td>
<td>12</td>
<td>n/a</td>
</tr>
<tr>
<td>Swedish</td>
<td>7.8 (1986)</td>
<td>9</td>
<td>n/a</td>
</tr>
<tr>
<td>Danish</td>
<td>5</td>
<td>5.3</td>
<td>n/a</td>
</tr>
<tr>
<td>Finnish</td>
<td>4.7 (1993)</td>
<td>6</td>
<td>n/a</td>
</tr>
</tbody>
</table>

Note. Author compiled the data from the ethnologue.com web site on 7 October 2003.
resilience of cultural and linguistic barriers made Biltereyst skeptical of the EC’s efforts at market integration. In an analysis of small European states, Burgelman and Pauwels (1992) concurred with the linguistic sphere of influence discrepancy Biltereyst identified, and concluded that small states “have too limited a market and too meager financial resources and possibilities of exploitation to be credible and profitable in a unified market” (p. 175).

The EC agency charged with facilitating cross-lingual, cross-cultural program flows is the Directorate-General for Education and Culture (DGEC). Its basic responsibilities are to foster a single European market for broadcasting, offer regional support to national-level media systems, and provide “defence of European cultural interests in the context of the World Trade Organisation” (http://europa.eu.int/comm/avpolicy/intro/intro_en.htm). Thus the DGEC’s mandate aligns with the “Television Without Frontiers” directive: It is as much a statement of sovereign cultural rights and extra-regional exclusion as one of internal cooperation and inclusion. MEDIA is a series of programs running from the early 1990s through 2006, and perhaps beyond, to support the DGEC’s objectives. The first phase, MEDIA 1995, was adopted in 1990 with this purpose:

1. to remove the barriers from national markets and to initiate “cross-frontier” cooperation in order to promote economies of scale;
2. to give “priority to small and medium-sized operators”; and
3. to “maintain proper regard for national differences and cultural identities, avoiding any cultural uniformization and paying particular attention to the needs of small countries and less widely spoken languages.”

(Commission of the European Communities, quoted in Humphreys, 1996, p. 280)

Part of MEDIA’s mandate, in alignment with the third objective, is to support language transfer and thereby facilitate the regional exchange of film and television. The European culture ministers were hesitant to finance the pursuit of these goals, however; the MEDIA 1995 program budget was one-tenth the amount spent on information technology research (Burgelman & Pauwels, 1992, p. 180), and proponents for doubling the program’s budget for the second phase mustered only a 55% increase in funding (Humphreys, 1996, p. 296). The goals of the second phase were twofold: training professionals and developing production projects and companies, and distributing and promoting audiovisual and cinematographic works. Several subprograms of MEDIA address these goals directly. Most pertinent to the present topic is “Broadcasting Across the Barriers of European Languages” (BABEL), which, with the assistance of the European Broadcasting Union (EBU), supports dubbing and subtitling with priority given to smaller languages (Burgelman & Pauwels, 1992, p. 178).

Another key agency is the Translation Service of the European Commission (TSEC), responsible for meeting the considerable translation needs of the EU. The service’s general mandate is to fulfill obligations under the aforementioned Regulation I requiring provision of documents in all official languages, as well as facilitating individuals’ communication with EU institutions in their own languages. The TSEC is organized into subject-based departments (e.g., legal, agricultural, social affairs), each of which contains a subunit for each official language. The 11 pre-enlargement languages are managed in Brussels, and the 9 new ones in Luxembourg. Like most contemporary translation companies in the commercial sector, the TSEC combines computer tools such as “machine translation” and “translation memory” with human translation. TSEC engages language transfer and technology use on an impressive scale and offers an interesting institutional example of the translation-mediated communication that O’Hagan and Ashworth (2002) argue will become increasingly common in addressing linguistic differences as regionalization and globalization deepen in the digital age.

If, as O’Hagan and Ashworth argue, the information and communication technologies now employed for translation and interpretation integrate more closely with those used in audiovisual cultural industries, and with voice recognition and voice synthesis as well, the institutional separation of the DGEC and TSEC could become an impediment to EU leadership in responding to the challenge of language difference in media under free trade conditions. Due to the developments in policy, technology and communication practice discussed in this section, Europe is presently well positioned to lead in language transfer in support linguistic diversity. Yet the political, economic, and technological forces behind convergence are accelerating change at a pace that policy has difficulty maintaining.

LANGUAGE AND MEDIA POLICY IN NORTH AMERICA

Although significant linguistic diversity exists among the peoples of Canada, Mexico, and the United States, sizable language populations are limited to English, Spanish, and French. Indigenous peoples and members of immigrant communities speak numerous other languages, but their numbers and market power are relatively minor. Among a Canadian population of 32.2 million (July 2003 estimate), 59.3% speak English, 23.2% speak French, and 17.5% speak other languages. Both English and French are official languages in Canada. In Mexico, population 105 million (July 2003 estimate), 88% speak Spanish as a first language, and 8% speak various Mayan, Nahuatl, and other regional indigenous languages. Among a U.S. population of 292 million (October 2003 estimate),
82.1% only speak English, 10.7% speak Spanish, and 7.2% speak other languages. In considering these statistics, we should keep in mind the media economists’ arguments concerning the competitive advantages accruing to English-language media producers due to the relative wealth of Anglophone markets, the prevalence of English as a widely spoken nonnative language, and the U.S. tradition of producing for export. All are central to concerns over “Global English” as well as U.S. hegemony within the Anglophone world.

As a collection of economic policies and trade accords, the North American Free Trade Agreement has distinct goals from the EU, and only a fraction its bureaucracy. NAFTA has not developed language diversity policies or media regionalization services as we saw in the European case. A brisk, United States-dominated trade in media pre-existed NAFTA, and the agreement’s implementation has had little impact on the media business status quo, except for increased interest by U.S. and Canadian investors in the Mexican market, which was quickly tempered by the peso devaluation of 1994–1995. By and large, language difference has remained as it was prior to NAFTA: the purview of commercial enterprises and internal organizational offices. Government agencies and supranational organizations have limited involvement.

The United States possesses the greatest economic strength and political power among the NAFTA nations, and its media industries’ influence has been of concern to both of its neighbors since early in the 20th century. Geographic proximity has led U.S. media industries to consider Anglophone Canada an extension of the domestic market, and Mexico as the gateway market to Latin America. As noted in my prior discussion of language and economics in the media trade, long-term efforts toward appealing to diverse domestic audiences are considered a competitive advantage for Hollywood. I should note that such appeals have not developed in the direction of language diversity. U.S. society expects linguistic assimilation of its non-English-speaking members, an expectation that extends to audiences for audiovisual media. Only recently have mainstream media companies taken a sustained interest in non-English language media. As is the case with other media-related issues that other nations consider important to regulate, language use in U.S. media has been left largely up to market forces, with English predominating.

The expectation that domestic audiences consume media in English does not mean U.S. industries, or the federal government, have been oblivious to the importance of language differences in international markets. Kirsten Thompson (1985, p. 160) identifies a Department of Commerce report written in 1930, shortly after the introduction of sound to film, which identified three types of language markets in Europe: one of the principal languages would suffice (e.g., Britain, France); one of the principal languages was spoken as a second language (e.g., The Netherlands); and one of the principal languages would not be understood and the market was too small to offset language transfer costs (e.g., Scandinavian countries, Italy, Poland). This is but one example among many of the U.S. government promoting media exports (Guback, 1984), and demonstrates the close association between languages and profit potential in the thinking of U.S. trade strategists and media enterprises.

Internal language difference has been treated similarly. The Spanish-language sector was all but ignored by mainstream U.S. media industries until the 1980s, the so-called “Decade of the Hispanic” when significant profits were posted, and publicized. Hallmark Cards and First Capital Corp. purchased the television network and station group now known as Univisión, for over $600 million in 1986. The competing Telemundo network was initiated by non-Latino investors at the same time, and after changing hands several times, was purchased by NBC for $2.7 billion in 2001. The success of numerous Spanish-language radio stations has generated interest in that market—Clear Channel Communications, the largest radio station group in the country owned eleven Spanish-language stations at the time of writing. The dot-com boom of the late 1990s and early 2000s saw significant interest in Spanish-language web portals that would knit together Spanish-speaking users not only in the Americas, but Spain as well. Yet in spite of steady growth in audience size and consumer spending by Spanish speakers since the 1980s, Latino media’s share of advertising spending in the United States has lagged far behind Latinos’ percentage of the population (Missed Opportunities, 2002).

In Canada, cultural sovereignty is a sensitive issue and linguistic diversity has clearly influenced the policy environment surrounding Canadian communication industries. Language in media has been tied to two broad cultural policy concerns: longstanding efforts to limit the volume and impact of cultural product flows from the United States and, more recently, the protection of language rights. Francophone Canada has relied on strong cultural industries as well as assertive cultural policy to defend its precarious linguistic position as a minority enclave within a mostly Anglophone nation, sharing a border with the world’s communication superpower, and participating in a language market having its own media hegemon, France. Lemieux and Saint-Jacques (1996) argue that Francophone producers have struggled against a triangular cultural imperialism from those exogenous competitors. Quebeacois policymakers have developed some novel responses. In 1985 the Quebec government passed a law that for every English-language film appearing in the province a French-language dubbed version had to be released within 45 days. This was a boon to the Quebeacois dubbing industry not
only for the volume of work it produced, but also because competitors based in France had difficulty meeting the short turnaround time (Kelly, 1997). In a more recent case, the Commission de Protection de la Langue Francaise fined a photographer for posting a web site containing text only in English. Quebec’s Charter of the French Language requires that all commercial documents include the French language. The offender argued that photography constituted a different language and should be exempt from the rule. “French is required,” responded a spokesman for L’Office de la Langue Francaise. “You can have any other language in addition to that, but you must at least have French” (Friedman, 1999, p. 1).

Although the media imperialism thesis was initially developed to explain influence of Western nations’ media on developing nations (Tomlinson, 1991), the Canadian case demonstrated that geographic proximity and same-language status for the majority population can render one developed nation vulnerable to overwhelming influence from another. As mentioned earlier, U.S. communication industries have tended to treat Anglophone Canada as an extension of the U.S. market; thus, language serves as a conduit for market penetration. Canadian concerns regarding U.S. media imperialism date from the early years of film and radio (Pendakur, 1990) and played a central role in free trade negotiations. Canada elected to exempt cultural industries from its 1989 Free Trade Agreement with the United States. The exemption caused a row between the two countries, but Canada held firm and the United States countered by including in the FTA a “notwithstanding” clause that enabled the United States to take countermeasures of equivalent commercial effect if Canada restricted trade in the cultural industries (Hoskins et al., 1997). Canada’s firm stand apparently emboldened the Europeans to follow suit during the 1993 GATT negotiations, and was maintained for the NAFTA negotiations in the early 1990s (Verón, 1999). Media industry statistics reported in 1992 reveal the depth of this trade issue for Canada: U.S. companies reportedly controlled 93% of Canada’s film and video business, 90% of music recording, 92% of book publishing, and were earning around $350 million annually from television programming (Silverstein, 1992).

When Mexico negotiated its partnership in the NAFTA, it did so distinctively from Canada, and from a position of relative weakness vis à vis both of its trade partners, but especially the United States. (Mexico’s GNP was approximately 5% of that of the United States in the early 1990s [García Canclini, 1992].) U.S. cultural industries have a strong historical presence in Mexico, a market that has long been considered a stepping-stone to the rest of Latin America. Following the 1988 FTA experience with Canada, American negotiators were wary of any efforts to exempt cultural industries from the agreement, and Mexico’s trade negotiators counted on language difference as a form of protection from Anglophone trade partners. Maria y Campos (1992) notes that any “natural protection” offered by the Spanish language and Mexico’s cultural idiosyncrasies is countered by Mexicans’ consumption habits which are changing as globalization advances and the cultural-linguistic barrier becomes more permeable. Other observers have pursued similar arguments that U.S. influence in Mexico’s media and consumer goods sectors was strong well before NAFTA’s implementation, making the agreement’s impact on the resiliency of cultural-linguistic barriers difficult to discern (Bonfil Batalla, 1992; García Canclini, 1992). Mexico’s principal concession was to allow up to 49% foreign ownership in nonbroadcast audiovisual media (Galperin, 1999).

There are historic ties between U.S. cultural industries and Mexico in the translation sector. Antola and Rogers (1984) describe an arrangement whereby Televisa, Mexico’s dominant television producer and broadcaster translated U.S. television programs in return for exclusive rights to air the programs in Mexico. The U.S. companies, in turn, acquired dubbed versions of their programs to sell elsewhere in the Spanish-speaking world. Antola and Rogers argued that this arrangement yielded competitive advantages for the regional distribution of Televisa’s own programming which carried the same accented Spanish heard in dubbed U.S. programs and which came to be considered “neutral,” even in the U.S. Spanish-language sector (Dávila, 2001). My own research confirmed this claim—respondents to a survey of Latin American television producers, distributors, and broadcasters cited Mexico most frequently as the source of neutral Spanish accents (Wilkinson, 1995). While translation businesses have developed in other areas such as Miami and Venezuela, Televisa remains a central player in Mexico City.

Televisa has also maintained a strong presence in the United States’ Spanish-language sector. Gutiérrez and Schement (1984) described the company’s influence as “reverse media imperialism” because a media conglomerate based in a developing nation controlled market conditions in a developed one. Although this argument is difficult to sustain on several fronts, the linguistic implications are important. Treatment of the U.S. Spanish-language sector as an aftermarket for content produced in Latin America has limited U.S. Latinos’ access to the medium, and Latin American Spanish is strongly favored over U.S. Spanish even in the programming that is produced in the United States (Rodríguez, 1999; Dávila, 2001). Clearly, the programs’ linguistic appeal to audiences in the Latin American export market is a motivation behind this. Popular talk shows and variety shows such as Sabado Gigante that are produced in the United States include audience members from throughout the hemisphere to increase the appeal, and therefore the export value, of the programs.
Since 1992 when Televisa partnered with the Venezuelan conglomerate Venesión in the U.S. network Univisión, they have maintained such a tight lock on programming that the principal competing network, Telemundo, has partnered with Brazilian conglomerate, TV Globo, to supply *telenovelas* dubbed from the Portuguese (Hopewell & Sutter, 2001). Although TV Globo is a well-respected television producer, and in spite of the linguistic proximity between Spanish and Portuguese, the lip-sync mismatch is apparent and some audience members are more dubbing tolerant than others in a notoriously dubbing-intolerant United States. The dubbing may represent a particularly strong impediment for viewers who are accustomed to viewing *telenovelas* shot in Spanish, such as those appearing on Univisión. Such dubbing of programming between Spanish and Portuguese (and perhaps more frequently from those languages into English and French) is indicative of what’s likely in store for Western Hemispheric media audiences and industries should a Free Trade Area of the Americas come to pass. As noted earlier, the changes will be more gradual and less far-reaching than the European case due to the commercial nature of the media trade in the Americas, and the comparatively weak influence of trade, cultural, language and media policy on the audiovisual industries in the Western Hemisphere.

**CONCLUSION**

The foregoing section demonstrated that the European Union and NAFTA trade regimes have treated regulation of the trade in media, including language issues, quite differently. Canada’s efforts to strike an appropriate balance between cultural and economic elements in the media trade is closer to the Europe Union’s position than that of its principal trade partners, the United States and Mexico, both of which were reluctant to include provisions that might limit access to the other’s market. Where Canada deemed its linguistic proximity with the Anglophone United States a threat, Mexico’s linguistic proximity with the U.S. Spanish-language sector had long afforded its principal media company a competitive advantage. This raises an intriguing issue surrounding the relationship between language and market access. Canada and the European nations, most notably France, have adopted protectionist positions vis à vis importation of U.S. media content. They have also complained for decades of limited access to the wealthy U.S. domestic market, arguing that media industries in the United States protect their home turf through various anticompetitive means (Wildman & Siwek, 1988). By contrast, Mexico has been relatively open to U.S. media products but has also developed as a significant production and export center for television programs not only within the Spanish-language market, but also worldwide. Televisa’s strong presence in the U.S. Spanish-language sector since the early 1960s has been a cornerstone for its export development. Market access potential is tied to industry growth in the producing/exporting nation, as well as market conditions, policy regimes, and various factors, language among them, influencing the importation and reception of content in the importing nation. My prior discussion of key factors driving policy developments indicates that communication-related change will be accelerating in the decades to come. The exact direction of those changes remains unclear making this a fertile, if challenging, area for future policy research.

As the EU and NAFTA move toward enlargement, language diversity is certain to increase in salience. The Translation Service of the European Commission has been scrambling to establish field offices and hire sufficient numbers of qualified content-area translators for the nine new languages incorporated in 2004. The challenge to MEDIA and other programs aimed at integrating Europe as a common media market is daunting given the minority status of all the new languages. There is likely to be increased reliance on machine translation, translation memory, and other computer-based technologies for the language transfer processes that the EU must engage in order to deliver on its commitment to protect and promote cultural and linguistic diversity. If indeed the NAFTA extends to a Free Trade Area of the Americas, an expanded set of linguistic issues is likely to engage, and the role of policy in addressing them is difficult to predict. Assuming Brazil’s participation, a fourth major language, Portuguese, would be added to the trade regime. Given Brazil’s historic interaction with the United States, Anglophone Canada, and Spanish America, this should pose few new challenges. It should be enlightening to follow the evolution of linguistic diversity in media among the Spanish-speaking nations of Latin America, a topic that has gained salience in the region (Cortes Bargalló et al., 1998). As I noted earlier, certain accents and languages are privileged through media market development. An important question for future research is how free trade enlargement engages particular sets of identity attributes among existing members of a trade regime on the one hand, and the new entrants on the other. For example, how might feelings and expressions of cultural-linguistic nationalism differ in regions where language difference in media is being proactively managed through public policy compared to areas where it is left to the power of the market?

Recent communication policy research, including a number of contributions to this special issue, stresses the central challenges posed by application of information and communication technologies (ICTs). At the transnational level ICTs have facilitated the dissemination of mass media and connected more geographically dispersed individuals through interactive media. Language difference...
remains a stubborn obstacle to fluid cross-cultural communication, and ICTs are assuming a central role in diminishing the differences. If the predictions of O’Hagan and Ashworth (2002) come to pass, electronic devices will be executing language transfer in a variety of forms in the not-too-distant future. Some observers concerned about the viability of Europe’s continued integration under the conditions of an information society call for more proactive efforts to apply ICTs to the language difference issue (Laver & Roukens, 1996). If Europe succeeds in aligning its communication-relevant policies to the demands of the information society, the effort it has already expended to protect language diversity will pay off. The application of ICTs to transborder media flows in the Americas is likely to be driven more by commercial than policy concerns, with the probable exception of Francophone Canada, which has pursued a language transfer policy in closer alignment to Europe’s. This research has shown that policies governing language use in media are spread across several policy categories and are articulated and applied, with varying degrees of vigor, at the local, subnational, national, regional, and supranational levels. There exist marked differences from country to country within, as well as across, regional trade regimes, yet the tension between economic forces of homogenization and cultural–linguistic tendencies toward heterogeneity is shared among all participating societies. If the sensitivity of language to sovereignty concerns is considered in conjunction with the current factors driving policy developments—even more complicated identity issues, economic/trade transformations, the migration of policymaking to supranational organizations, rapid technological change, and media transnationalization—we begin to comprehend the breadth and significance of language difference in communication-related public policy. Policymakers and researchers alike should recognize the need for more systematic evaluation of these complex relationships across subnational, national, and supranational levels, and initiate the important process of elucidating them.

NOTES

1. An example is Article 75 of Mexico’s Federal Radio and Television Law (1960), requiring that programs be broadcast in Spanish unless special permission is obtained from the government in advance of the broadcast. The rule was violated regularly by pay television systems, to little comment or concern, until the mid 1990s when the upstart network Televisión Azteca attacked its main competitor, Televisa, for diluting Mexican culture by transmitting volumes of programming in other languages, especially English.

2. Phillipson (2003, pp. 15–16) identifies language policy overlap with these areas: culture, commerce, foreign affairs, education, and research.

3. Hoskins et al. (1997, p. 32) describe the cultural discount concept: “a particular television programme, film or video rooted in one culture, and thus attractive in the home market where viewers share a common knowledge and way of life, will have diminished appeal elsewhere as viewers find it difficult to identify with the style, values, beliefs, history, myths, institutions, physical environment, and behavioural patterns.”

4. Content genre can also be an impediment—a long-standing adage in the distribution of television is that comedy does not travel well.

5. For an historical perspective on how France has responded see Machill (1997) and Ahearne “(2002).

6. The French acronym for “Measures to Encourage the Development of an Audiovisual Industry.”

7. Machine translation is the application of computers to translate texts from one natural language to another by replacing words and phrases. Translation memory is the process by which previously-translated phrases in the target language are suggested to the translator who adopts or alters them. The increasingly common application of computing tools designed to facilitate the work of human translators rather than provide stand-alone translation is called computer-aided translation.


11. One of the concerns expressed by advocacy groups opposing the sale was that Hallmark and First Chicago would convert the network to English-language broadcasting after a 2-year agreement expired.

12. An interesting challenge to this process is the dearth of translators in the Baltic states who are trained in Western European languages—many have been trained in Russian due to the political history of the region (personal communication, Robert Rowe, 2002).

REFERENCES


