


# How does knowledge circulate in a regulatory network? Observing a European Platform of Regulatory Authorities meeting

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## Abstract

Multi-level networks of regulatory authorities are considered as vectors of knowledge circulation, norm diffusion, and regulatory coordination. However, this is often assumed without empirical scrutiny of the concrete “micro-dynamics” between individual participants in networks, which remain a “black box” for analysts. This paper is mainly based on direct observation and informal interviews conducted during a meeting of the European Platform of Regulatory Authorities in charge of regulation of the broadcasting sector. It seeks to elucidate what deliberation, socialization, and learning, considered as devices typical of “soft” governance modes, mean as concrete social practices within a network.

**Keywords:** deliberation, learning, media regulation, regulatory networks, soft governance.

## 1. Introduction

National regulatory agencies are frequently embedded in transnational “regulatory expert networks” (Eberlein & Newman 2008, p. 46), whose establishment is often promoted by supranational bodies, such as the European Commission (EC) (Coen & Thatcher 2008; Levi-Faur 2011; Mathieu 2016). A network can be defined as “a set of relatively stable relationships of a non-hierarchical and interdependent nature which link a variety of actors” (Levi-Faur 2011, p. 813), and such regulatory networks have become “new transnational actors of administration” (Stone & Ladi 2015, p. 839) that promote an “international policy culture” (Stone 2004, p. 548). How does this form of “incorporated transgovernmentalism” (Eberlein & Newman 2008), which has become a popular form of “decentred” (Black 2001) governance and of the regulatory regime in Europe (Dehousse 1997; Eberlein & Grande 2005), work concretely?

Although ordinary aspects in network operation matter, they “are difficult to grasp because they often belong to the world of the unsaid and taken-for-granted” (Adler-Nissen 2016, p. 92). Hence, the properties of regulatory networks are often assumed without any empirical scrutiny of their “micro” foundations, thus leaving open questions. Dunlop and Radaelli, for instance, write that in the literature on policy learning the actual learning process “is often left undefined with authors preferring to focus on the outputs of learning” (2017, p. 4). For instance, how do certain problems become hot topics in networks, how does learning occur through face-to-face relationships, and what does it entail (Freeman 2008, p. 3; McCann & Ward 2012a, p. 48)?

This article takes Slaughter and Hale’s comment on the state of research on networks seriously: “scholars need to better understand the way influence and power operates within transgovernmental networks” (2010, p. 365) and, ultimately, “to understand how policy is made in these relatively unstructured environments” (2010, p. 367). More specifically, of interest is “the take-up of information and ideas, practices and technologies among individuals, and principally among networks of peers” (Freeman 2006, p. 370). The core research question focuses on how knowledge circulates in regulatory networks, and the study is based on the assumption that in order to answer such questions one needs to scrutinize the “micro-dynamics” in networks, which has been neglected thus far. Such an approach leads to a revision of the current understanding of information networks as vectors of “soft” and horizontal cooperation. They can be, at the same time, both more and less than that: more because inequalities in terms of authority and influence exist in them, and less because knowledge diffusion and learning face limits therein.

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One needs then to adopt a “micro-level” perspective (Checkel 2005) that consists of “studying the chains, circuits, networks, webs, and translations in and through which policy and its associated discourses and ideologies are made mobile and mutable” (McCann & Ward 2012a, p. 43). In this respect, there is “a need to attend to the various situations in which policy knowledge is mobilised and assembled” (McCann & Ward 2012a, p. 47), as the roles of “transfer agents” (Stone 2004), “transit points,” and “sites of persuasion” (McCann & Ward 2012a, p. 48) appear to be crucial. Typically, international meetings exemplify such situations; however – as is argued by a reflexive piece on the role of meetings in learning processes – “not much is made of meetings in the public policy and related literature” (Freeman 2008, p. 4).<sup>1</sup>

The present contribution intends to take Freeman’s critical comment seriously. It is based on the direct observation of a biannual meeting of the European Platform of Regulatory Authorities (EPRA) in charge of the regulation of the broadcasting sector, supplemented with the study of documents related to that event, with informal semi-structured interviews with participants, and with “update” interviews, mostly with EPRA officials.<sup>2</sup> It does not cover all aspects of the observed meeting, but rather concentrates on the specific question of how transnational diffusion of knowledge concretely takes place (or not) during such a meeting. International meetings have now become a prominent part of professional and organizational life: a meeting can be described as “a pre-arranged opportunity for purposive communication” and “if we want to go looking for learning, we might go to meetings” writes Freeman (2008, p. 3). Such events can therefore be considered the “nearest possible vantage points” (Schatz 2009a, p. 307) to observe the diffusion of knowledge and as illustrative examples of how “soft” governance operates through networks. Regarding EPRA, its meetings are the sites *par excellence* where interactions between members of the network can be observed.

However, observing networks *in vivo* and *in situ* is usually not an option for policy researchers, and this is a more general limitation that scholars willing to study political-administrative elites generally face. There are some significant exceptions, focusing on high-level members of national bureaucracies (mainly works by Bevir & Rhodes 2010 and Rhodes 2011), on members of the judiciary (by the French sociologist of science, Latour 2009), or on the personnel of central banks (Holmes 2013). One should also mention Zabusky’s (1995) pioneer study of the European Spatial Agency, and extensive works on the operation of the EC (Shore 2000; Ban 2013) and its services (Koskinen 2008). Studies of international organizations such as the World Trade Organization (Abélès 2011), of transnational institutions such as the International Monetary Fund (Harper 1998) and the World Bank (Weaver 2008), and private credit rating agencies (Ouroussoff 2010) are also worth noting. These are ambitious studies that aimed to capture the whole culture of the organizations under scrutiny (including as it is embodied in meetings), whereas the present study is much more modest in its intentions.<sup>3</sup> It should not be considered more than an exploratory attempt to identify the role that meetings play in the operation of information-based networks of regulators, and, more generally, their possible contribution to the regulatory process. This in turn implies a reflection on the generalization potential of such a study.

The choice of EPRA as an object of scrutiny was constrained by practical considerations. “Being there” (Rhodes *et al.* 2007) was made possible thanks to an invitation by the Swiss Office of Communications to be part of their delegation (this is the only avenue by which to participate in such a meeting). Fortunately, this invitation was not accompanied by any restrictions or conditions. One has to acknowledge that in this kind of research, researchers “are more often beggars than choosers” (Fine & Shulman 2009, p. 179) with regard to the sites of their observations. However, one also has to take into account that there is substantial cross-sectoral variation regarding the role, and ultimately the power, of regulatory networks, and that such differences limit the potential for generalizing the findings based on a single network. As a matter of fact, the European regulatory “space” is “divided and fragmented between different types of institutions, actors and instruments on the one hand and modes of co-ordination and decision-making on the other” (Levi-Faur 2011, p. 810). For instance, while the financial sector displays a highly integrated network of agencies related to a strongly liberalized and internationalized sector, the broadcasting (or the communications) sector is configured as a looser cluster of regulators that must deal with domestic-based, powerful stakeholders (Coen & Thatcher 2008).

Hence, one should keep in mind the possible implications of the particular properties of EPRA for the external validity of any findings based on observations made on this network. It can be said that empirical evidence based on a single case or, even more, a single event, lacks robustness. This is an important problem that often haunts case study work, although much less so the ethnographic part of it, which mostly uses direct observation as fieldwork strategy. Such studies are frequently guided by an “interpretive” epistemology (e.g. on policymaking; Yanow 2000) that is suspicious of positivist research postures guided by the goal of identifying general causal mechanisms. Such a suspicion is not shared, however, by all ethnographers,<sup>4</sup> and in this research the ethnographic approach is primarily a method for accessing and analyzing observations (Gains 2011, p. 161).

The present undertaking is guided by the belief that “small social scenes house sufficient materials for adequate explanation” (Rock 1999, p. 5). The question of the generalization of observations from a single network can be addressed by thinking of policymaking in terms of “powering” and “puzzling.” Such a divide reflects the traditional tension in politics between power and reason (Allen 2012), which materializes for instance in the distinct discursive activities of “bargaining” and “arguing” (Elster 1994). In policy analysis this is an old distinction too, dating back to Hecló’s (1974) comparative work on social policies in Great Britain and Sweden. Hecló wrote:

Politics finds its sources not only in power but also in uncertainty – men collectively wondering what to do (...) Governments not only ‘power’ (...) they also puzzle. Policy making is a form of collective puzzlement on society’s behalf: it entails both deciding and knowing. (1974, p. 305)

Hecló thereby intended to rehabilitate the role of learning in social policy development. To be sure, the distinction is not as clear as it appears; there are power issues around puzzlement (on issue definition and on responses to problems), there is individual and collective puzzlement (and strategic learning) about how to achieve power, and participants in decisional processes are concerned both with the acquisition of power and with problem-solving. However, some sites are obviously more propitious to “puzzling” (i.e. reflection and deliberation about how best to solve problems) than others. Jobert (1998), for example, distinguishes between policy “arenas” (where actors are power-seeking) and policy “forums”, such as those populated by “epistemic communities,” in which actors deliberate on policy solutions. Because EPRA has no binding capacity as a network (Thatcher & Coen 2008, p. 821; Table 3), one should expect more collective “puzzling” than power games to take place. Modestly (and significantly) called a “platform,” EPRA is then the ideal place to study how mechanisms of soft governance operate. In addition, if one nevertheless finds signs of “powering,” this is interesting as an indication of the limits of arguing and deliberation, even in an a priori favorable context.

The article is structured along the following lines: after situating the present contribution in the relevant literature and the study of the EPRA meeting in its broader context, it deals with the characterization of the network with regard to the issue of “powering” and its impact on knowledge circulation. The paper then seeks to capture what deliberation, socialization, and learning in a network mean, before concluding with a discussion of the more general validity of the findings.

## 2. Conceptual section: Toward a study of “micro-dynamics” in regulatory networks

Delving into the literature on regulatory networks – European or transnational – allows an insight into the kind of goals and functions that one may anticipate to characterize a network such as EPRA. This section situates the present undertaking in such literature, and indicates the major sources of inspiration for this particular approach to network activity.

First, the origin of regulatory networks has been much debated, and has been explained both in functional and in political terms.<sup>5</sup> The functional perspective focuses on the regulatory gaps that international cooperation is expected to fill. According to Slaughter and Hale, for instance, the origin of such networks lies in the fact that in a context of global interdependence “domestic officials find they are unable to adequately fulfil their responsibilities without consulting and coordinating with foreign counterparts” (2010, p. 359). The political perspective focuses on the preference for the network option in Europe instead of the more centralized option of a European regulatory agency. The formation of a network is seen as an escape route that fills the regulatory gap created by the existence of pressures to delegate regulatory powers to the European level in a context where national authorities are reluctant to give up their formal power (Eberlein & Grande 2005, p. 91).

This contribution takes stock of such literature and considers that if regulatory networks are designed to contribute to the achievement of four main functional tasks of regulation – information gathering, rule setting, monitoring, and enforcement (Levi-Faur 2011, p. 813) – then EPRA clearly falls into the category of “information networks” (Slaughter & Hale 2010, p. 360). Such networks that operate along an “information-based networking logic” (Eberlein & Newman 2008, p. 29) “represent a soft, informal and gradual mode for the international dissemination of ideas and policy paradigms” (Stone 2004, p. 560; see also Jordana 2017). Information appears to be a crucial resource for horizontal coordination and harmonization: “the availability and dissemination of credible information that meets professional technical criteria proves to be the most effective instrument for soft control,” write Eberlein and Grande (2005, p. 100). More specifically, the circulation of information means the sharing of experiences, example setting and collection of best practices, mutual learning, and the diffusion of expertise through technical advice. Networks are expected to collaboratively produce a number of “goods” with respect to the circulation of information, such as:

(1) events and meetings; (2) data for benchmarking; (3) public pronouncements; (4) materials for stakeholders; (5) capacity-building for professional staff; (6) best practice laws, procedures, and rules; (7) regulatory network news; and (8) technical studies. (Berg & Horrall 2008, p. 188)

Although the formalization, cohesiveness, and influence of regulatory networks vary, their characteristic “open and collegial” (Levi-Faur 2011, p. 812) style of governance has been adequately portrayed with the concept of “orchestration” (Blauberger & Rittberger 2015, p. 367). The *raison d’être* of networks is precisely to facilitate “networking” among their participants – that is, the development of linkages between their members through useful encounters (Coen & Thatcher 2008, p. 67). Hence, networks operate as “transnational policy communities” in which “experts and professionals share their expertise and information and form common patterns of understanding regarding policy through regular interaction” (Stone 2004, p. 559). As such, they can also be viewed as socialization sites in which common beliefs may emerge on appropriate courses of action through “the transfusion of norms, values and identities amongst actors” (Slaughter & Hale 2010, p. 365) and through the internalization of a set of collectively shared common dispositions: a “habitus” in Bourdieu’s (2000) terms. As suggested by Scott, “participation in such networks is likely to shape one’s world view, and successes and failures in the terms of the network members are liable to meet with approval and disapproval” (2010, p. 14). More ambitiously, regulatory networks can be considered to act as “identity builders” (Laffan 2004): they contribute to the generation of a common professional identity (*esprit de corps*) among the members of “a transnational problem-solving community” that develops “converging definitions of problems and philosophies for their solution” (Joerges & Neyer 1997, pp. 619–620). Even “information networks” that do not detain any form of formal authority can contribute through their intellectual function to the development (at least among the professionals involved) of a common episteme through “learning, norms and benchmarking” (Thatcher & Coen 2008, p. 813). However, the looser a network, the more one may expect orchestration to take place without an “orchestra conductor” (Bourdieu 2000, p. 256).

The literature on the role of networks in regulation implicitly or explicitly assumes that they are sites of deliberation. What may be seen as the founding study in that respect was not on regulatory networks but a case study on European Union (EU) comitology committees existing in the foodstuffs sector, which described them as “co-operative forms of inter-administrative governance” that promote “a culture of interadministrative partnership which relies on persuasion, argument and discursive processes” (Joerges & Neyer 1997, p. 612, 620). Against the intergovernmentalist view of European integration that emphasizes strategic interaction between national actors with competing interests, but also against “orthodox supranationalism” that highlights the power of the Commission, this study emphasized “the emergence of a deliberative style of European regulatory policy,” that the authors called “deliberative supranationalism” (Joerges & Neyer 1997, p. 610). Its main characteristic is the search for “common solutions to common problems by means of deliberative interaction,” in a context in which “scientific evidence is accepted as the most valid currency for effecting convincing arguments” (Joerges & Neyer 1997, pp. 617–618). Such a view aimed at inducing a “deliberative turn in integration theory” (Neyer 2006) highlights the existence of governance mechanisms relying “upon persuasion, argument and discursive processes rather than on command, control and/or strategic action” (Joerges 2006, p. 781).

Although studies of regulatory networks do not necessarily refer explicitly to their deliberative component, they clearly rest on similar assumptions (Gehring & Krapohl 2007). “Deliberation” can therefore be considered a core “sensitizing concept” (Bowen 2006) that indicates the direction in which the researcher should look. Slaughter and Hale write, “the goal of many networks is to share experience, deliberate over experiences, learn for colleagues and coordinate action around ‘best practices’” (2010, p. 366). Participants in networks:

[M]ust try to convince their counterparts to follow a certain course of action through argumentation and persuasion. Influence thus comes not solely from a nation’s power or wealth, but rather from an actor’s ability to earn the trust of their peers. (Slaughter & Hale 2010, p. 363)

Danielsen and Yesilkagit also highlight the authority of epistemic credentials, claiming “activities are likely to have a strong epistemic anchoring and influence may thereby be highly correlated with the ability to produce professionally sound arguments” (2014, p. 357). One of the main alleged virtues of deliberation is to lead to mutual learning in the sense of “the updating of beliefs based on lived or witnessed experiences, analysis or social interaction” (Dunlop & Radaelli 2013, p. 599). Slaughter and Hale add, for instance, that “networks serve as fora for experimentation and

sharing, which leads to learning” (2010, p. 363). To state it differently, learning is the goal, and socialization through deliberation is the mechanism to attain it, therefore “socialization” and “learning” can also be considered as major “sensitizing” concepts.

However, the literature on regulatory networks is usually silent on the “micro-dynamics” of networks, and in particular on the role of individual actors – such as those observed during the EPRA meeting – in deliberative and learning processes within networks. In the words of critical geographers, it has “a tendency to downplay the social practices of comparison, education, emulation, imitation and persuasion” (McCann & Ward 2012b, p. 6). Policy analysts, for instance, are now aware of the necessity to take into account “micro-dynamics” for learning processes:

Studies examining this micro to micro setting uncover the disruptive potential of learning, the importance of individuals in sense-making and the socialization mechanisms that often determine what lessons are adopted or disregarded. (Dunlop & Radaelli 2017, p. 305)

On such questions, additional insights can be gained from works that are seldom cited in research on regulatory networks and, furthermore, do not frequently refer to each other. References to insights from these works are made in the next sections of this text, but the main sources of inspiration are threefold:

- Constructivist studies in the fields of international relations and EU studies that scrutinize processes of diffusion of new norms and mechanisms of international socialization (Acharya 2004; Checkel 2005, 2012; Greenhill 2010). Socialization can be defined as “a process of inducting actors into the norms and rules of a given community” (Checkel 2005, p. 804), and a core research question is: Under what conditions do international institutions deploy a strong socializing potential that may even lead to an endpoint with the internalization of a common sense of community and belonging? Based on fine-grained “process-tracing,” such studies are particularly attentive to “scope conditions” and causal mechanisms in diffusion processes.
- Research on the role of knowledge circuits in learning processes (Dunlop 2009; Freeman 2006, 2008; Freeman & Sturdy 2014), and, more specifically, on the role of transfer agents (or “entrepreneurs”) in processes of transnational policy or knowledge translation (Stone 2004, 2008, 2012). Such research can be related to the political science literature on policy diffusion,<sup>6</sup> as well as to the international relations research program on “epistemic communities.”<sup>7</sup> In the original contribution by Haas, an epistemic community (be it domestic or transnational) was defined as “a network of professionals with recognized expertise and competence in a particular domain and an authoritative claim to policy relevant knowledge within that domain or issue area” (1992, p. 3). The glue that holds such communities together is a “shared belief or faith in the verity and the applicability of particular forms of knowledge or specific truths” (Haas 1992, p. 3). Being networks of professionals that rely on common expert knowledge, information networks can be adequately described as epistemic communities, even though the concept has usually been more narrowly applied to communities of scientists (Davis Cross 2013, p. 143). One might object that EPRA as such has no strong policy influence. However, in the case of epistemic communities, the latter varies depending on a number of factors – such as problem uncertainty (Davis Cross 2013, pp. 151–154) – and therefore, their track on policy should not be considered as part of their defining traits: for an epistemic community to exist, it is mainly the professionalism of its members that matters (Davis Cross 2013, p. 155).
- Critical approaches of policy “assemblages, mobilities and mutations” by geographers and urban researchers (McCann 2011; McCann & Ward 2012a,b, 2013). They share a concern “for tracing how, and where, policy models and policy expertise move, studying how these models mutate as they move, and examining how they become part of new policy assemblages through a combination of everyday local practice and global connection” (McCann & Ward 2013, p. 14). These works emphasize the relational dimension of policymaking, and highlight the complex geography of “policy tourism” and the circulation of “regimes of truth” (Prince 2012). Such approaches tend to exaggerate their differences (Peck & Theodore 2010) with the prevalent “methodological nationalism” of “orthodox” policy transfer research in political science (as well as the homogeneity thereof); after all, constructivist scholarship on international socialization and on the translation of policies is not grounded on radically different ontological premises. Nevertheless, they have the undeniable merit of providing fine-grained insights on “how, why, where and with what effects policies are mobilized, circulated, learned and reassembled” (McCann & Ward 2012b, p. 326), thanks to “geographers’ focus on place, space and scale, coupled with an anthropological/sociological attention to social relations, networks and ‘small p’ politics, both within and beyond



institutions of governance” (McCann & Ward 2013, p. 3). Thus, critical geographers use qualitative and ethnographic methods to observe the circulation of knowledge with an attention to situations that may seem mundane – such as face-to-face encounters in meetings, conferences, workshops, lectures, field trips, site visits, or informal dinners – but are nevertheless crucial because they are places where persuasion and negotiation occur (McCann & Ward 2013, pp. 9–11).

By drawing lessons from these three strands of research, mainly to observe individual interactions during a meeting of EPRA, this paper therefore seeks to improve the understanding of how an information-based regulatory network operates in its “micro-dynamics.” It contributes in its own way to the “practice turn” in the study of European integration that is advocated by Adler-Nissen (2016). Although she is reluctant to focus on causal mechanisms because of her non-positivist ontologically relational approach of integration, Adler-Nissen correctly claims that “existing approaches within EU studies, be they rationalist or constructivist in orientation, often ignore routines and habits that are integral to making the EU what it is” (2016, p. 87) and that “a practice turn in EU studies will allow us to grasp uncharted experiences and practices that are crucial for the performance of European integration” (2016, p. 88). This is precisely what the present contribution intends to do.

### 3. The European Platform of Regulatory Authorities meeting in context

Set up in 1995 following an initiative by six domestic regulators, in comparative terms, EPRA is a loose network of the formal national or regional public organizations endowed with the task of regulating the broadcasting sector. Its core business is the exchange of information about problems and practices – one should not think then of EPRA as an organization that adopts common positions or directly steers regulatory coordination.<sup>8</sup> Much more recently (on February 3, 2014), the EC established a formal group of the regulatory authorities of member states in the field of audiovisual media services that now exists alongside EPRA. This group, the European Regulators Group for Audiovisual Media Services (ERGA) brings together heads or high-level representatives of these regulatory bodies and, unlike EPRA, aims to exert policy influence beyond the simple exchange of information between its members (which is also included in ERGA’s objectives). Although it has no formal power over national regulators, it may adopt common positions or declarations, and its main task is to advise the Commission in implementing the EU’s principal regulatory tool in the field: the Audiovisual Media Services Directive (AVMSD), which is meanwhile in a revision process as part of the Commission’s Digital Single Market strategy.

Such an organizational creation through an evolutionary “layering” process (Thelen 2004), whereby new organizations are added to existing ones, is taking place in a context of changing broadcasting and audiovisual landscapes, with content increasingly created, distributed, and viewed across borders and online, and with related regulatory challenges. On the one hand, one might expect that the new role of ERGA confines EPRA to the role of a very “soft policy forum” (Harcourt & Weatherill 2008, p. 3), and one of our interviewees<sup>9</sup> saw a risk of future marginalization of the Council of Europe as a player in the field of media regulation in Europe (the EPRA secretariat has been based at the European Audiovisual Observatory, which is part of the Council of Europe, since 2005). On the other hand, such developments may further clarify the mission of EPRA as a forum for exchange between its members, and the issue of the complementarity between the two networks has been debated in formal and informal consultations between the Commission and the EPRA board before the establishment of ERGA.<sup>10</sup> EPRA participates as an observer to the activities of ERGA, and there is ongoing cooperation between the two organizations: for example, ERGA consulted EPRA on the complementarity of its work program for 2016 with EPRA’s work program for the year (European Regulators Group for Audiovisual Media Services [ERGA] 2016).

Through its participation in formal rulemaking at European level, ERGA is best described as a “European regulatory network” (Thatcher & Coen 2008, p. 813), whereas EPRA is closer to the less institutionalized form of “informal networks of independent regulatory agencies.” EPRA defines itself in article 1 of its statutes as:

...an independent platform of regulatory authorities whose primary function is to be: a forum for informal discussion and exchange of views between regulatory authorities in the field of the media; a forum for exchange of information about common issues of national and European media regulation; a forum for discussion of practical solutions to legal problems regarding the interpretation and application of media regulation. (EPRA 2011a)<sup>11</sup>

Significantly, the same article stipulates “the remit of the EPRA shall exclude the making of common declarations and the pursuit of national goals.” The document on a draft three-year organizational strategy for EPRA submitted for consultation to network members by the executive board (and thereafter adopted at the Erevan meeting in October 2016) reasserts that EPRA is “non-political” in approach and operations (EPRA 2016, p. 3), is “a non-combative, politically-neutral forum” (2016, p. 4), and “a non-policy making body” (2016, p. 6).

In the first paragraph of the same document, one can read the following self-description:

...an independent network of 52 audiovisual regulators who share best practice and experience and who learn from the experiences and knowledge of others. One of the key features of EPRA is the bringing together of all its members twice yearly but, in reality, it is much more than that. EPRA functions as an ‘always-on’ source of knowledge and advice for its members, where any member can readily query or research any regulatory matter with its other European colleagues. (EPRA 2016, p. 3)

EPRA is primarily conceived of as a site for the international exchange of information that might assist national regulators in their domestic functions. The transnational diffusion of knowledge and know-how is the core function that guides the activities of EPRA,<sup>12</sup> including the production of many informative documents, often prepared in working group meetings. The informal exchanges between its members should also be added: the importance of informality was stressed by all interviewees, who consider it a distinctive feature of EPRA.

I had the opportunity to observe the 34th EPRA meeting, organized in Brussels (in La Hulpe, in the outskirts of the city) by the regulator of the *Communauté française de Belgique*, on October 5–7, 2011.<sup>13</sup> All of the national – and regional, for federal states like Belgium, Germany, and Spain – regulatory authorities that are members of EPRA, except for one, were present at that meeting (45 countries were represented; Iceland has joined since then, and the network now counts 52 members). The EC (DG Connect), the Organization for Security and Co-operation in Europe (OSCE) representative on Freedom of the Media, the Council of Europe, and the European Audiovisual Observatory are permanent observers in the network and were also represented. According to the list of participants, delegations counted between one and seven members (for the French *Conseil supérieur de l’audiovisuel*), and they were composed of medium and high-level staff of the national regulatory authorities.<sup>14</sup> There was a substantial proportion of female delegates, especially among the younger participants. According to a member of the Swiss delegation, most participants were lawyers, like herself (besides being a part-time university lecturer).

It is a deliberate choice on behalf of EPRA authorities not to draft minutes and not to provide detailed reports on the meetings of the network, in order to preserve their “informal” character and to make participants feel more free to express themselves.<sup>15</sup> Incidentally, it appears that transparency and accountability, which are key values of the network according to its organizational strategy, may not be easily compatible with such an emphasis on informality. Despite the absence of a report, one can take the content of the bilingual English–French bulletin, *Regulation*, which was disseminated in the meeting, as an example of “inscribed” knowledge (Freeman & Sturdy 2014). Issued by the Belgian authority of the Francophone region, which hosted the meeting, and received by all participants upon registration, it featured contributions by members of the EPRA board, in which the collaborative dimension was clearly at the fore. The German member contribution was entitled “Cooperation within EPRA – What does it mean for me as a (regional) regulator?”; the Italian, “To give and to take: That’s what EPRA is for”; and the Croatian, “How useful can EPRA be for a newly established authority?” In her contribution, the member from British Ofcom noted that “authorities cannot afford to regulate in complete isolation,” while she also interestingly suggested “cooperation is not an altruistic exercise.” The press release issued by the EPRA secretariat after the meeting (EPRA 2011b) summarized the main content of the meeting, which concentrated on “the regulation of new media, with a particular focus on media-on-demand services, the protection of minors, and the cooperation between broadcasting regulators in Europe.” Cooperation, thus, appeared again as the core function of this meeting. Interactivity was explicitly aimed at, so, for example, all background papers included a list of questions for debate.

#### 4. Epistemic community or yet another arena of “powering”?

“Studying the ‘atmosphere’ of situations in which policy knowledge is shared” (McCann & Ward 2012a, p. 48) is useful. The image of network meetings that I (erroneously) had in mind was that of a rather small group sitting and exchanging in a seminar room. Although this was correct for the working group sessions (on product placement, digital TV, and the

protection of minors in new media) these ran in parallel during the meeting, an image that was not appropriate for plenary sessions. For example, the large number of participants prevented the usual ritual initial phase of participants introducing themselves to one another (Freeman 2008, p. 6), and while the format of the plenary sessions did not inhibit learning, it was rather inimical to a genuine exchange of arguments. Regulatory networks are considered as typical multilevel governance devices, but one should not forget that in the case of EPRA its members are official national representatives. This implies an intergovernmental component as well, which was visible in the “staging” of the meeting. The plenary session room put the intergovernmental dimension to the foreground: each national delegation could be identified through a small flag on its desk. This seemed self-evident for the participants, although EPRA repeatedly emphasizes its “informal” character. Beyond the symbolism of national flags, international power politics were not completely absent even from a meeting of that type of “platform.” It may happen that agencies serve as transmission belts for their government’s foreign policy; a Cypriot participant told me that their delegation feels that it should be ready in such a meeting to counter the claims made by participants from Northern Cyprus (occupied by Turkish armed forces since 1974 and only recognized by this country’s government since then), who are included in the Turkish delegation.

Not only did the ritual of plenary sessions look a bit like a miniature of the United Nations General Assembly, but the same can be said about particularly poignant moments when some participants were “manifestly vulnerable or deeply touched” (Katz 2002, p. 83). For example, some regulators used the period dedicated to reporting by national delegations to complain about political interference with their work in their home country and to request support from their counterparts. Regulators reported being seriously threatened in their independence, or even in their existence, for example, in Spain. The delegate from the regional regulator of Catalonia expressed concerns about a bill that would allow the revocation of members of its Council during their mandate. The new chair of the regional regulator of Andalusia read a political statement criticizing the intentions of the regional government to dismantle the authority and considered this a “threat to democracy.” Similarly, the delegate of the regional regulator of Navarra spoke about the plans of the regional government to abolish the independent authority and urged EPRA members to write letters of protest to the government and to the regional parliament. The EPRA chairperson left the decision to act in the hands of each delegation, as if (domestic) “politics” should not contaminate the business of transnational deliberation. EPRA acknowledges that “there are specific threats to the independence of certain audiovisual regulatory bodies” (EPRA 2016, p. 5); however the more recent ERGA group of regulators is more affirmative in that respect: for instance, it recently issued a statement “on alarming developments for the independent functioning of media regulators in Europe” (referring to problems in Croatia and in Greece) (ERGA 2017), although the conditions of adopting such statements have been the object of debate (ERGA 2016). One may object that it is well documented that the participation of national regulators in transnational networks facilitates their emancipation from domestic political authorities. However, this requires networks that are more powerful than EPRA,<sup>16</sup> and one may also wonder whether participation in networks changes much for those who face particularly strong pressures at home.

Finding “sanctuary from the pressures and uncertainties [one] must deal with at home” (Freeman 2008, p. 10) is thus no easy task. In the light of such acute problems facing some regulators, one comes to realize that, even if it would be appropriate for them to be concerned with learning in the network, other, more existential issues stand logically at the forefront.<sup>17</sup> This particularly applies to a network like EPRA that includes members from countries with weak democratic credentials. Truly independent regulators coexist with regulators who are subject to governmental interference,<sup>18</sup> most of which deplored this situation, although a few might be tacitly consenting to it. Unlike the network, the arena of domestic politics can be strongly characterized by “powering,” especially as there are serious problems regarding media freedom and independence from governments in some states, and media regulation is likely to have strong redistributive effects on political and economic actors. Under such conditions, it is reasonable to expect that the capacity or willingness of regulators to learn and to transfer the knowledge that they are supposed to have gained through their participation in this meeting will be variable.

## 5. Deliberating in the network

Given that EPRA is prototypical of the “soft” variant of regulatory networks in which “puzzling” should prevail at the transnational level at least, it can be viewed as an ideal case to test the widely held assumption that networks – and in particular their meetings – are deliberative sites. A first obvious question concerns the object of deliberations: What kinds of issues were on the agenda of the EPRA meeting?



Let us start with the first session of the meeting, which was devoted to legal problems caused by the development of on-demand media services, a topic that was already on the agenda of the previous meeting at Ohrid (EPRA 2011c). This session was introduced by a legal specialist from a Scottish university, whose input was followed by comments from selected delegates of national regulatory bodies (France, Slovakia, and the United Kingdom). A problem-solving approach clearly prevailed in the discussions and continued to prevail after the coffee break, with the discussion of five regulatory puzzles. This session focused on typical situations that are problematic for regulators, which were exposed together with questions for debate in a background paper made available to the participants. In an email that the EPRA secretariat circulated to the participants four days prior to the meeting, it “warmly” encouraged them to “think about these in advance of the meeting.”

Although the five cases were presented as “fictitious,” some participants (apparently the best informed) expressed their amusement, given the proximity of these cases with real-world problems that regulators actually faced. Given that some issues were “touchy” for some countries, or for their relations with their neighbors, the chair of the session insisted on the fictitious character of the cases and that no minutes would be kept on the discussions. One can refer again to the “intergovernmental” aspect of the EPRA meeting: national interests or the preservation of distinct national regulatory styles are sometimes at stake, but at least to the Belgian chair, this should not be expressed openly, because he probably anticipated that this could lead to unwelcome conflict. Any interstate rivalries were considered as a sort of “noise” in the meeting atmosphere. The “powering” dimension of cross-border interactions was not prominent; at most, it was visible through insinuations, and when it emerged, it was kept at the margin in order not to contaminate the meeting.

In addition, network members tend to appear united in the presence of external actors. In the debate that took place in the afternoon session of the first day, the regulators displayed common views vis-à-vis outsiders, and this was a nice illustration of the esprit de corps developed by people believing that they all have the same mission to carry out. This session was about the protection of minors, and the invited guests (two British and one Italian) came from the private sector. The debate clearly mirrored a public-private cleavage: the guests from the private sector insisted on the virtues of self-regulation whereas the network members expressed doubt as to whether self-regulation provides sufficient guarantees for the protection of minors. Thus, no open clash of paradigms was discernible among regulators, although the fact that conflict does not appear at the front of the stage does not mean that it is absent from the network. Many member states have, for example, a problem with British Ofcom, which is the largest regulatory body in the network. A great number of media companies are located in the United Kingdom but bypass national regulation abroad by being regulated by Ofcom.<sup>19</sup> As paradigms may diverge, as suggested by members of the French delegation, each potential opinion-maker seeks support for their views from other delegations that share them (the French cited the French-speaking Belgians and the Catalans, who obviously share a concern for cultural diversity).

Furthermore, the existence of a deliberative atmosphere does not necessarily mean that the deliberative power is equally distributed; some actors enjoy more epistemic authority and are, therefore, more legitimate message producers than others. As observed by Joerges and Neyer in their study of comitology committees, power in such expert circles is related “to the ability to present and substantiate convincing arguments (...) Administrations lacking the resources for supporting their arguments in ‘reasonable terms’ (...) face serious difficulties” (1997, p. 616). In other words, the (relational) “force of the better argument” is underpinned by a (structural) capital of credibility. Take the five “fictitious” issues discussed in the first session. They were first scrutinized by the members of the British, French, and Slovak regulatory authorities, who had already given talks in the first part of that session, and were followed by various interventions. An Italian member of the EPRA executive board intervened on the first “hypothetical” case. A Swiss delegate said that, from her experience, she anticipated this person would intervene because she is counted among the opinion-makers in the assembly. This Italian member is also a lecturer in media law (with Master of Laws in European Law and a PhD in European social law), and gave this description of herself in the *Regulation* bulletin:

Italian-Norwegian mother tongue, in her daily work she is regularly involved in audiovisual regulatory issues at European level, both at international conferences and committees and as national expert in EU and CoE cooperation projects.

Later, joining the European Audiovisual Observatory, she moved thus from the status of an “internationalized public sector official” to that of a “transnational policy professional” (Stone 2008, p. 30).

Clearly, the Swiss delegate did not assign the same degree of credibility to all participants. Another member of the Italian delegation also often intervened in debates, but she did not take his claims seriously, unlike those of the member of the EPRA board coming from the same country, saying this time that she could equally easily anticipate that this person would ritually take the floor to make long interventions.<sup>20</sup> Where one speaks from, matters as well: members of the executive board are persons whose opinions count. This happens not so much thanks to their formal status *per se*, but rather because becoming a board member is a sort of gratification for being active and displaying expertise within the network. Candidates for the board must be nominated by at least two members (to avoid self-nominations), but informal cooptation plays an important role in spite of the existence of a formal vote: competitive elections are the exception to the rule, since the number of available persons usually does not exceed the number of available positions (five), because the job requires a strong personal commitment<sup>21</sup> and logistical as well as political support from home.<sup>22</sup>

Another case of authority is that of the EC as a collective body. EPRA is independent from the EC (Levi-Faur 2011, p. 820; Table 1), and is only funded through the contributions of its members.<sup>23,24</sup> The EC is formally only an observer among others in EPRA meetings; however its advice on problematic cases was sought repeatedly at the end of each debate. When cases involved a conflict between EU member states, the EC representative regularly advised that regulators cooperate with each other. Notably, the EC representative was congratulated by the EPRA chairperson for the quality of his contribution. The authority of the EC is based on structural properties. It has been portrayed as an orchestrator that uses European regulatory networks as intermediaries facilitating the interaction with national agencies, described as its “domestic targets” (Blauberger & Rittberger 2015, p. 368). One should also consider that institutions such as the EC and the Council of Europe are important agenda-setters in the field. For example, online services were on the meeting agenda, and this was timed with the EC’s consultation on the topic, which closed in November 2011, and with implementation of the Audiovisual Media Services Directive of 2010, which was then on the agendas of most national regulatory bodies.<sup>25</sup> Overall, the role of the EC *outside* the network is converted into authority *within* the network.

Network meetings are events “where actors can bring their embodied knowledge for enactment in debate and discussion” (Freeman & Sturdy 2014, p. 74). However, a network like EPRA often deals with complex technical matters that require expertise, and it is therefore unavoidable that knowledge is unevenly distributed, say between more or less developed countries, or depending on the size of national regulators (significantly, together with the background paper to the meeting, the secretariat provided a list of definitions). It would be inappropriate to speak in such a context of power as domination, but there are leaders and laggards with regard to the contributions to the debates. Although the members of a network such as EPRA can be seen as part of the “Eurocracy” (Kelemen & Tarrant 2011) and as “internationalized public sector officials” (Stone & Ladi 2015, p. 845), they are by no means all equally “natural cosmopolitans” (Kennedy 2005): some are more active in accompanying the internationalization of regulation than others. For example, prior to starting a career in British Ofcom as the head of the section on international affairs, one of the EPRA board members studied law in Madrid, did her PhD at the European University Institute in Florence on “Regulation and Competition in European Broadcasting: A Study of Pluralism through Access,” was a researcher on comparative media law in Oxford, and a visiting lecturer at the Central European University in Budapest.

Obviously then, there are “teachers-and-learners” relationships in the learning process, and the “teachers” endorse the role of “norm entrepreneurs” with respect to the social construction of authoritative knowledge. Either as individuals or as members of highly professionalized organizations, they are endowed “with skills and resources to make things happen” (Checkel 2012, pp. 1–2), such as expertise, reputation, and trust (Coen & Thatcher 2008, p. 68). Thanks to their individual authority or thanks to the capital that they borrow by belonging to an authoritative body, they receive *de facto* certification and authorization to “teach,” even in the absence of any formal authority within the network, and to act as transfer agents by “uploading” their policy preferences to transnational settings (Bach *et al.* 2016, p. 21). As pointed out again by McCann and Ward, in each policy area, some sites “appear and reappear as places to emulate. Others are cast as emulators rather than educators” (2012a, pp. 44–45). Moreover, if “emulators” learn anything through their participation in network meetings, they usually do so passively and silently (Meyer-Sahling *et al.* 2016).

A Czech participant confirmed the gap between opinion-makers and opinion-takers by insisting on the inactivity of small countries, which can be explained (according to her) by the fact that large regulators can more easily “detach” people who permanently deal with matters related to the network, and thus specialize in them.<sup>26</sup> A member of the EPRA executive board confirmed the existence “to some extent” of such a gap between active and passive participants,<sup>27</sup> and mention was also made of the existence of two distinct “leagues.”<sup>28</sup> In a discussion over lunch during the meeting,

the same member of the EPRA board had said that it would be very surprising if a panel does not include someone from British Ofcom and from the French CSA, even though the latter was not represented at that time on the EPRA board. The sequencing of interventions on the second “fictitious” case approximated this configuration. First, there was an intervention by the Slovak panelist, who emphasized the similarity with a case that the Slovak authority had been confronted with. Then – on an equal footing with the interventions of national regulators – there was an intervention by an invited Scottish academic expert (see above), followed by an intervention of the panelist from British Ofcom, and finally by the panelist from the French CSA.

## 6. Socialization and learning in the network

Slaughter and Hale write:

...more research is needed to understand the mechanisms through which socialization might occur within transgovernmental networks, the relation between socialization and the operation of networks, and the conditions under which socialization does and does not occur. (2010, p. 365)

One can, nevertheless, build upon the scope conditions considered necessary by Checkel (2005, 2008) for socialization dynamics to occur. Scope conditions (SC) refer to the parameters within which a theory, a causal relationship, or simply an observation is more likely to be valid. In the case of international socialization, Checkel (2005, p. 813) identifies five SCs for the internalization of new understandings of appropriateness to take place through his “middle-range” approach. It appears that the setting of the EPRA network fits most of them, but not (or rather not thoroughly) SC 3:

- *The target of the socialization attempt is in a novel and uncertain environment and thus cognitively motivated to analyze new information* (SC1): Given the rapidly changing broadcasting landscape that poses a number of challenges (e.g. legal “puzzles”), EPRA members clearly operate in an uncertain environment and thus face strong incentives to seek information.
- *The target has few prior, ingrained beliefs that are inconsistent with the socializing agency’s message* (SC 2): None of the participants openly displayed deeply entrenched dissonant beliefs during the meeting.
- *The socializing agency/individual is an authoritative member of the ingroup to which the target belongs or wants to belong* (SC 3): Although national regulators demonstrated their commitment to EPRA through their attendance, EPRA cannot be seen as an authoritative socializing entity, because its mode of governance is so “soft” that the network does not produce a unique message.
- *The socializing agency/individual does not lecture or demand but, instead, acts out principles of serious deliberative argument* (SC 4): Virtually all individual interventions were characterized by a willingness to deliberate and the presence of reasoned arguments, often backed by examples.
- *The agency/target interaction occurs in less politicized and more insulated, in-camera settings* (SC 5): The EPRA explicitly describes itself as non-political, and when delegations confronted with an unfriendly domestic environment requested support from EPRA members, the EPRA authorities insisted that this is not the role of the network; in addition, interactions take place in-camera (in a conference center in the case of this meeting) and, as already noted, no minutes apart from a summary of the debates are kept.

Given that SC 3 is not completely present in EPRA, one can expect mechanisms of persuasion to exist, but socialization to be rather shallow, precisely because the socialization channel is of a “soft” nature. Studies of socialization distinguish between more or less far-reaching, deep, and durable conversions. Similarly, policy science literature considers broad variation in the amplitude of learning, from learning of individual policy instruments to learning that leads to changes in one’s core beliefs. Learning can thus be purely instrumental, aiming simply at updating technical knowledge. In this case, it does not imply socialization to a worldview that would create “new understandings of appropriateness.” This kind of learning is valued by EPRA, which has a rich intranet site with numerous links to varied information that is relevant for practitioners. In the document on EPRA’s organizational strategy, the platform “prides itself on being an expert and informed voice in European audiovisual regulation” and adds: “our twice-annual fora for regulators aim to demonstrate an openness to listen and a willingness to learn” (EPRA 2016, p. 6). There is an online forum as well, that is extensively,<sup>29</sup> perhaps even increasingly,<sup>30</sup> used. A Cypriot delegate indicated that by posing questions during the

forum, she came in touch with the Hungarian agency and subsequently both agencies cooperated as a result of their joint dependence on the Nielsen Company.

On the other hand, Checkel's SC 3 refers to the presence of agents who are authoritative members of the ingroup to which the targets of socialization belong or want to belong. In a sense then, socialization also means the gradual internalization of norms on best practice that mirror the beliefs of network members endowed with epistemic authority and counting as transfer agents. An interviewee agreed that some actors try to convince other participants about their beliefs,<sup>31</sup> and according to an anonymous member of the EPRA board, it is mainly participants from countries with large organizations who seek to promote their views in the network. Another interviewee, by contrast, said that she has not observed such deliberate attempts.<sup>32</sup> A former EPRA chair refuted that regulators join meetings with an agenda in mind (and estimated that this would be judged as inappropriate), but agreed on the existence of "usual suspects" regarding influence in the network.<sup>33</sup> Therefore, some members may exert influence even without seeking to do so, and the question is also whether these members are open to learning from the others. If not, this would be a reminder of Deutsch's definition of the exercise of power as "the ability to talk instead of listen, the ability to afford not to learn" (1963, p. 11). The EPRA secretary thinks that learning is not unidirectional in the network, and that it is difficult to generalize across organizations or even across individuals.<sup>34</sup> For example, among the large regulators, the board member from Ofcom pointed out that her organization learns from exchanges in EPRA<sup>35</sup> and the French CSA delegates claimed during the meeting that they have an interest in learning too, but confessed that this was a recent shift.

If we focus now on the "targets" of socialization, such as regulators of smaller and less developed countries (typically new EU members, accession candidates, and countries beyond these circles), they seemed to be most attentive to examples and recommendations from entities they would consider as their models – with the EU often performing such a role – and from countries they consider similar to theirs, or simply from their neighbors. Geographical and, to some extent, cultural proximity as well, led to the formation of smaller networks or forums for the cooperation of broadcasting regulators (Mediterranean, Central European, Nordic, Baltic, Iberian, French-speaking, etc.) (EPRA 2011d). The perception of situational similarity in particular seems both to create a sense of commonness and to facilitate inspiration.<sup>36</sup>

...we learn from (and with) others with whom we identify in some way: because they are like us, or perhaps because we would like to be like them, or because their problems seem to be like [ours]. (Freeman 2006, p. 384)

For example, a Swedish agency member's talk on program monitoring was followed by a discussion initiated by the Italian member of the EPRA board, who reminded, "we share the same problems," during which interventions from countries as diverse as Ireland, the Netherlands, Malta, and Denmark all emphasized similar experiences.

The fact that the cultural heterogeneity of the network causes problems, should not, however, be disregarded. Asked in an informal interview about their "networking" partners, the Cypriot delegation mentioned regulators from the Mediterranean and the Balkan countries because these countries lack a culture of compliance, and therefore the inclination for the regulated not to comply with regulations can almost be qualified as the default option. The Cypriot delegates insisted that the strongly influential West European members of the network fail to see this reality, which upsets their mental frames by introducing dissonance. Nevertheless, it should also be noted that the British Ofcom EPRA board member emphasized that participation in EPRA meetings helps her to keep in touch with reality and taught her humility with respect to the diversity of situations.<sup>37</sup>

There are, however, more limits to learning: it has already been noted that it is doubtful whether some actors can set learning as their first priority because they are too preoccupied with their fate, which depends on domestic "power" politics. In addition, EPRA acknowledged in its recent document on a draft three-year organizational strategy (EPRA 2016, p. 5) the fact that its members have to invest resources such as time, personnel, and finance to many regulatory activities, including participation in other regulatory networks. Furthermore, participants in EPRA meetings do not necessarily exercise executive functions in their organization; therefore, even intra-organizational learning (knowledge transfer to the management at home) may be constrained,<sup>38</sup> not to mention the likelihood of political officials' lack of openness to learning. The aggregation beyond the micro (individual) to the meso (organizational) or macro (political) level of learning is not self-evident. We may add obstacles of a cognitive nature to learning to these limits: some participants, probably those most in need of learning, may lack the expertise to implement what they (in principle) could learn from the network, or simply the linguistic skills to capture the subtleties of the debates during network meetings.<sup>39,40</sup> There was no evidence of that, but it may be hypothesized that those with weaker cognitive or linguistic skills may use fragile heuristics, which could possibly lead to a bias in learning.

Finally, contrary to expectations from the literature on networks (Papadopoulos 2014), not much “peer” accountability seemed to be at work in EPRA – that is, accountability “based on mutual monitoring of one another’s performance” (Goodin 2003, p. 378) and leading, thereby, to learning. The former EPRA chair could not discern any signs of peer-pressure in the network,<sup>41</sup> and the current EPRA chair was categorical that participants do not have any feelings of obligation to each other.<sup>42</sup> Another board member preferred to talk about “peer pride” rather than pressure, or “carrots” instead of “sticks.”<sup>43</sup> If one considers the three sequences of an accountability process described by Bovens (2011) – that is, the provision of information, debate on this information, and sanctions (positive and negative) concluding the debates – only the first sequence is present in the EPRA network. True, each regulator is invited to submit an activity report twice a year that is made available on the EPRA website. In addition, the secretariat produces a synthesis from national reports, and there is some time left at the end of meetings for a discussion of issues raised in the reports, on a voluntary basis. However, it would be unrealistic to expect such reports to be widely read, and there is not much space for a real debate on them. Therefore there is no pressing need for the authors of reports to provide justifications, nor can their peers exert pressure on them through their judgment. If any common norms emerge in such a soft network, this is not a result of social conformity. Yet things may be different in a more cohesive network,<sup>44</sup> and this is not to say that mutual accountability was never an issue during the meeting.

In one of the sessions, a participant from Luxembourg mentioned cooperation problems with the regulator of the French part of Belgium. The latter was perceived as excessively intrusive on domestic matters, and the participant from Luxembourg considered that his authority does not have to provide accounts to a foreign regulator. Embarrassed by the situation, the panel chair gave the floor to the representative of the Belgian regulatory body, who claimed that because regulation requires cooperation between equals, a smooth exchange of information between them would be a sign of courtesy. There was also informal accountability vis-à-vis the EC, although the latter formally participated only as an observer in the network. On the morning of the second day, there was a discussion on the transposition by member states of the EU directive on audiovisual media services. The EPRA meeting is not the formal setting where such problems are solved, and the EC official mentioned them only incidentally in one of his interventions. However, he repeatedly chased members of various agencies at the coffee break to talk with them about what he considered as transposition deficits in national legislation. Although it is not possible to know if such informal pressure produced any effects, it is of note that the EC representative did not hesitate to be active regardless of the EC’s observer status and of the fact that the resolution of such problems is not part of EPRA’s mission.

## 7. Conclusion

Although direct access to the operation of networks is not often available to researchers, I was lucky enough to overcome this obstacle. This study was therefore based on three essential elements of qualitative fieldwork: observation, discussion, and reflection (Gilchrist 1999, p. 357). I observed a number of things, reflected on their meaning, and discussed interpretations of these observations with participants, involving them thus to some extent in a collaborative research process. These member checks, which required interpretation in turn, confirmed, enriched, refined, or amended my initial interpretations. For example, the initial field notes, characteristic of in-process writing, were “constantly re-examined and reinterpreted in light of new concerns and understandings” (Emerson *et al.* 2001, p. 363). If one reflects counterfactually on such research practice, without this back-and-forth process that is metaphorically described as “yo-yo fieldwork” (Rhodes *et al.* 2007, p. 207), one would be less confident in one’s conclusions. For example, what happened in debates with external actors during the meeting also happened during the update interviews: network officials tend to appear united vis-à-vis outsiders, and most among them who were interviewed later offered a stereotypical image of the network, a “cliché” quite similar to its own official self-presentation, that passed under silence most sources and manifestations of power asymmetry and conflict.<sup>45</sup> Direct observation qualifies such an idyllic picture, and I believe that without fieldwork focusing on “micro-practices” on the ground, this gap would not be revealed. There is indeed a risk of “going native” by not confronting the idealized picture of EPRA presented by officials and insiders with my own observations and interpretations. This does not mean that humility is superfluous; after all, what an author does is provide his or her “interpretation of their [the EPRA meeting participants’] interpretation of what the world looks like through their eyes” (Rhodes 2011, p. xii). This is not specific to research on direct observation, but the existence of a double hermeneutic is openly assumed here.



Beyond mere storytelling, what insights can be developed from the observation of the EPRA meeting? A preliminary but important observation is that although EPRA may be weak in its coordinating role, we should not overlook that this network deals with a topic (broadcasting) that may be highly sensitive and that reveals numerous interdependencies between political and economic interests. In addition, it is related to issues of fundamental rights and democracy (freedom of speech, media pluralism, and independence of their regulators) that are value-laden and salient. In that respect, Harcourt's skeptical conclusion is to the point:

Although soft governance has proven a useful tool for benchmarking and the exchange of best practice, it has been less effective in dealing with public interest concerns outlined by the European Parliament and other European institutions such as media transparency, freedom, plurality and independence. (2016, p. 13)

There is inherent ambiguity in EPRA to the extent that its actions are implicitly guided by the Council of Europe's principles regarding democratic best practice, but at the same time the network claims to be non-political, and the prevalent diplomatic atmosphere prevents open debate of "hot" issues regarding democratic deficiencies identified at the domestic level.

So far, the "practice turn" in the study of European integration has not impacted the study of networks of regulators. Drawing inspiration primarily from three related but distinct conceptual approaches (on international socialization, knowledge circuits, and policy mobilities), this contribution was attentive to the "micro-level" (Checkel 2005) dynamics of "mundane" network activity and to social practices involving individual participants, through direct observation of a network meeting. It approached regulatory networks as sites of deliberation, socialization, and learning, and their meetings as "transit points" and "sites of persuasion" (McCann & Ward 2012a, p. 48). In that respect, it took the relational dimension of "policy tourism" (Prince 2012) seriously and emphasized the prominent role of "transfer agents" (Stone 2004) in regulatory networks. This allowed me to come to more fine-grained conclusions and to make a more realistic assessment regarding the circulation of knowledge in an information-based network such as EPRA:

- As regards the issue of the presence of "puzzling" and "powering," the problem-solving atmosphere clearly predominated in this forum of "soft" policy coordination. Because there was a concern with conflict avoidance (that was also apparent in the interviews with network officials) and diplomatic language tended to prevail, rivalries regarding regulatory styles and differences in preferences between national regulators were played down. However, "powering" is present at the level of domestic politics, and this possibly acts as a constraining factor with respect to the dissemination of knowledge. In addition, the lack of conspicuousness of power games does not mean that authority is evenly distributed within the network, even though most interviewees were reluctant to admit the impact of inequalities. The "micro-practices" observed in the network meeting reveal the wielding of soft power, and talking about horizontal networks that operate through information exchange should not make us forget that participants in such networks are, by far, not equally active and influential in the deliberation process: clearly, there are core and peripheral actors in the EPRA community. During the deliberation process some actors appear as being endowed with epistemic authority and thus as more legitimate message producers than others. They become transfer agents who produce "ideas that become the commonsense expertise, the dominant paradigm, the taken for granted worldview" (Roy 2010, p. 56). Among these actors, the members of the EPRA board can be counted, national regulators from large states such as British Ofcom and the French CSA, as well as the EC, who cast its "shadow" as an accountability-holder. Such an authority builds on different kinds of resources (Slaughter & Hale 2010, p. 366): individual expertise, organizational size, or institutional power.
- Direct observation of the meeting also provides insights about its learning function. When actors learn, they draw inspiration from entities that they consider as models, either because they are highly respected, or because they face problems seen as similar. The "pedagogical" function of the meeting – with the network acting as a "hub" (Blauberger & Rittberger 2015, p. 369) – is particularly important given the heterogeneity and the existence of strong informational asymmetries between the EPRA members. However, these are, at the same time, limits to the "orchestration" function of the network and to its role as a socializing instance. Furthermore, and contrary to frequent assumptions about the socializing function of networks being wielded through "peer" accountability, it was not possible to identify any mechanisms related to that. Ethnographic approaches "ask us to be open to surprise" (Schatz 2017, p. 137), and in this case social pressure could hardly be considered to be the engine of

behavioral change (say in the direction of making credible commitments to network partners). However, things might be different in more dirigiste networks whose “steering” function is more prominent.

- Finally, direct observation of the EPRA meeting contradicted the more idyllic and optimistic claims by EPRA officials in follow-up interviews regarding power issues in the network and regarding limits to the fulfillment of its learning function. How can the predominance of such a stereotypical language among the interviewees be explained? It might be related to the role of informality in a network such as EPRA, which was also valued by all interviewees. Although it would be an exaggeration to argue that seeing informality as a core virtue leads to a culture of secrecy, informality may collide with the requirements of transparency and accountability, which are officially key values of the network. In particular, informality may induce EPRA officials to adopt a presentation of the network vis-à-vis outsiders that simply restates its official (and of course positive) characteristics.

Asking “How common is what I have identified?” and ‘How compelling is the evidence for the causal claims I am making?’ should be natural questions for any scholar,” as argued by a prominent political ethnographer (Schatz 2009a, p. 314). As already noted, one has to be cautious about the more general relevance of evidence based on a single event. There is a risk that the researcher’s immersion into his or her object prevents him or her from identifying the features of this object that are idiosyncratic. Therefore, it should be made clear that this article’s primary ambition does not go beyond seeking to provide a persuasive account of *one* meeting of *one* network. However, because scholarly works focusing on the “micro-level” in regulatory networks are scant, such a contribution can serve as a pilot study:

The data collected through ethnographic methods at the micro-level become the point-of-departure for analyses of broader macro-level political phenomena. In this sense, ethnographic methods provide a way of seeing big by looking small. (Brodkin 2017, p. 133)

The account of this particular EPRA meeting can serve as a “problematizing redescription” that challenges some among the alleged functions of networks on the basis of the existence of alternative “small-t truths” (Schatz 2009b, pp. 11–13), regarding, for instance, asymmetric deliberation and limits to learning. Such an account generates an inductively based understanding and conjectural knowledge of the “micro-dynamics” of regulatory coordination through networks, seen through the lens of concrete social practice in networks’ mundane activities. These hypotheses are in search of validation, and the scope conditions applying to potential generalization (such as the properties of the networks under consideration) should also be specified in future research. Let us hope that it will soon be possible to observe in situ – and over a longer period – the circulation of knowledge in other (and different) regulatory networks along with, more generally, the concrete operation of such entities.

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## Notes

- 1 See, however, Hall *et al.* (2000, pp. 48–55) on the “meetings culture” of Oftel (the former British Telecom regulator).
- 2 For more details on the methodological approach and for the list of interviewees, together with the guide of “update” interviews see the online supporting information.
- 3 For an ethnographic study of the local “translation” of international commitments regarding regulation, see Kayaalp (2012), and for a similar study on how national bureaucrats cope with international conferences, see Riles (2001).
- 4 See, for example, Katz (2001, 2002), the survey of different schools in Kubik (2009), and Wedeen (2010, pp. 257–260).
- 5 See the recent debate between Tarrant and Kelemen (2017) and Blauburger and Rittberger (2017).

- 6 Speaking of “translation” instead of diffusion means putting more weight on (creative) interpretations and mutations of policy meanings in processes of policy “indigenization” (Stone 2012, p. 489).
- 7 On the EU level, see Zito (2001) and Dunlop (2010).
- 8 See Harcourt (2006, 2016) on the impact of the EU upon the regulation of national media markets, even in the absence of a European regulatory agency in that policy field.
- 9 Interview 5.
- 10 Interview 1.
- 11 Levi-Faur (2011, p. 823) found that it was only possible to identify independent networks such as EPRA in nine of the 26 European regulatory regimes that he surveyed.
- 12 The reader can find here some examples of issues discussed in the context of EPRA: Political communication on new media—what regulation?; Local and community media: how to take into account their specificity?; How to assess media plurality in an online world?; Future models of media regulation; Digital radio: A chance, a challenge, a risk; Tackling discriminatory and hateful content in a convergent media environment; Tools and best practices to strengthen the independence of regulatory authorities; Empowering users: media literacy and protection tools.
- 13 The 35th meeting was scheduled in Slovenia in May 2012, and the 36th in Israel in November 2012 (but was subsequently cancelled as a result of the unstable political situation in the region).
- 14 For a study of this kind of personnel, see Geuijen *et al.* (2008).
- 15 Interviews 1 and 3.
- 16 See the “institutional scope conditions” of networks that are necessary according to Danielsen and Yesilkagit (2014, pp. 356–358) for the domestic autonomization of regulators.
- 17 “Generally, we do not look for information in the world out there, unless we have a personal motivation to do so” (Dunlop & Radaelli 2017, p. 310).
- 18 Interview 6.
- 19 Information shared by Alison Harcourt.
- 20 This was confirmed by a member of the Cypriot delegation.
- 21 Interview 3.
- 22 Interview 1.
- 23 Interviews 1 and 2.
- 24 Coen and Thatcher (2008, p. 58, Table 1) reported that EPRA received substantial funding from the EC.
- 25 Information shared by Alison Harcourt.
- 26 According to the EPRA website, the number of staff employed in the respective regulatory authorities varies from less than 10 to almost 900.
- 27 Interview 3.
- 28 Interview 5.
- 29 Interview 2.
- 30 Interview 5.
- 31 Interview 5.
- 32 Interview 6.
- 33 Interview 1.
- 34 Interview 2.
- 35 Interview 6.
- 36 Interview 6.
- 37 Interview 6.
- 38 Interview 6.
- 39 Interviews 4, 5, and 6.
- 40 The debates almost completely took place in English, although French is also an official language.
- 41 Interview 1.
- 42 Interview 4.
- 43 Interview 6.
- 44 That accountability to peers can be conducive to strategic calculation and thus sheer appearance of conformity to their expectations, inducing thus shallow and tactical learning (Stone 2004, p. 549), has nevertheless been underestimated. On dimensions of policy learning, see Dunlop and Radaelli (2013).
- 45 Because the EPRA secretary said in her interview to the author that EPRA officials discussed his/her interview requests, it cannot be excluded that their “clichés” on the network resulted from a concerted decision.

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