Political Advertising in International Comparison

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olitical advertising as understood here only appears in systems in which the distribution of political power is contested and determined in elections and in which parties or candidates compete with each other. Political advertising, then, is a means through which parties and candidates present themselves to the electorate, mostly through the mass media. In contrast to the so-called free media, political advertising is often referred to as paid media. Regular media coverage is called free because it allows candidates and parties to appear in the media without having to pay for it. Because this kind of coverage (e.g., the news) resides within the responsibility of the media and therefore enjoys higher credibility than candidatesponsored activities, political actors try first of all to get into the free media. The downside of free coverage, however, is that the usual journalistic selection and production criteria apply, and political actors cannot influence when, how long, or how they are covered. Paid media, in contrast, allow candidates, parties, and sometimes other interest groups to decide how they want to present themselves to the voters.

Because the distinction between paid and free media originated in the United States, where candidates are allowed to purchase advertising time on television, electoral advertising on television is classified as paid media. In many cases, other countries do not allow candidates to purchase broadcasting time for their campaign messages. Therefore, instead of classifying campaign channels as either free or paid media, a distinction of *mediated* versus nonmediated channels may be more accurate in an international context. This distinction is also sometimes called controlled media and uncontrolled media, because candidates and parties can control their own advertising messages but do not exercise complete control over the output of media news messages. In this sense, political advertising is a controlled, nonmediated campaign channel, meaning that responsibility for the ads lies with the political actors, and they do not run the risk of their messages being altered by the media production process. Instead, political actors determine how they are presented on television. Although this is the undoubted advantage of

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political advertising, such communication obviously has a persuasive intent that casts doubts on its credibility. It is, therefore, a challenge for campaign strategists to prevent and overcome the reactance effect that any persuasive communication risks.

Although political actors strive for frequent and ample coverage in the free media, and particularly on television, their interest in political advertising seems clear. In addition to the uncertainty of what the media will do in their campaign coverage, a commercialized media system has made it difficult for politics to compete with more attractive media fare. Political advertising thus gives candidates and parties the possibility to enhance their presence in the media and determine its shape and contents.

In an earlier work on political advertising in Western democratic systems, the editors defined televised political advertising as "moving image programming that is designed to promote the interests of a given party or individual" (Kaid & Holtz-Bacha, 1995, p. 2). Thus the definition incorporates "any programming format under the control of the party or candidate and for which time is given or purchased" (p. 2). As media systems, channels, and formats of communication have expanded and evolved, the central elements of this definition have remained useful, but a more modernized and professionalized definition now suggests that political advertising should be viewed as "any controlled message communicated through any channel designed to promote the political interests of individuals, parties, groups, governments, or other organizations." This broader conceptualization not only implies the controlled and promotional aspect of the message but acknowledges the different formats, channels, and sponsors that may characterize such communications in a given environment.

As political advertising developed in various media environments and as social changes led to a weakening influence of once-powerful social characteristics and subsequent political predispositions, election campaigns became more important. Traditional social structures have lost their meaning for the individual and no longer prescribe individual behavior in a binding way. Therefore, social variables that played a central role in the classical models of electoral behavior no longer predict voting decisions with the same probability that they once did. Instead, political behavior has become unstable and fluctuating (see Holtz-Bacha, 2002). In fact, findings from several Western democracies have shown that party ties are weakening. Voter volatility, as expressed in increasing numbers of floating voters, and voting abstention have been attributed to the so-called dealignment process (see Dalton, 2002). This is a process that seems to be going on in many countries but not at the same time or with the same speed everywhere. With voters thus being more unpredictable and their electoral decisions open to short-term influences, election campaigns have gained new importance. It is therefore not surprising that political leaders would be interested in the use of political communications such as political advertising that provide for the controlled and unmediated conditions that best serve their campaign interests.

Nevertheless, countries differ considerably in the role television advertising plays in electoral campaigns.¹ Although politicians are the lawmakers and could be expected to push for favorable conditions for their advertising campaigns, restrictions apply to electoral advertising in many countries. This seems to indicate that additional variables are at work here, affecting the attitudes toward electoral advertising and the decisions about the respective rules in a given country. Whether electoral advertising is allowed and, if allowed, the way it is further regulated are usually dependent on several systemic variables, including a country's political system, the electoral system, and the media system. Finally, how electoral messages are actually designed is dependent on a country's political culture, which, at the same time, is reflected in political advertising.

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Any study of political communication processes in an internationally comparative perspective must therefore consider the differences in political structures and processes, in political culture, and in the organization of the media (Hallin & Mancini, 2004; Swanson & Mancini, 1996). These variables and their specific interrelations provide for a distinctive national background against which the regulations for political advertising, the role of television adverting in campaign strategies, and findings about effects of political advertising have to be interpreted.

This volume only includes countries where the broadcasting of political advertising during election campaigns is allowed in one way or the other. However, there are countries that do not have electoral advertising on television, either because it is prohibited or because political actors (parties, candidates) agree not to use this kind of advertising channel for their campaigns. For instance, Switzerland is one of the countries where political advertising on television and radio is prohibited during election and referendum campaigns. Several reasons are given for the ban on ads in Switzerland. One is the assumption that parties would not have the financial means to pay for the production of the ads or to even purchase broadcasting time, because Swiss parties do not receive any state funding. However, advertising in newspapers plays a major role in Swiss elections, and protection of the print media and their revenue from advertising is another reason given for the ban on television and radio broadcasting ads. The Northern European countries are also reluctant to permit electoral broadcasts on television. Although Finland does not impose any spending or time limits on television ads, political advertising in Sweden is only imported through channels that broadcast from outside the country. Denmark does not have an official ban on ads, but political actors have agreed not to use them for their campaigning. As in Sweden, Norway also has traditionally had a ban on political advertising, but new regulations are being developed that will require television stations to allot free time segments for the parties.

South Africa, which is represented here with a chapter, also is a remarkable case. Although television does play a role in electoral campaigns and has gained importance over the last decade or so, electoral advertising is restricted to radio. In a way, the reasons given for this decision are similar to the arguments brought forward in Switzerland: Producing ads for television is expensive and would overstretch the financial possibilities of at least some parties. At the same time, television advertising is regarded as a powerful form of persuasive communication and therefore not to be placed in the hands of those striving for power.

As the country chapters of this book illustrate, even where party or candidate spots are allowed, there are many differences in the respective regulation. These differences start at the level of terminology. In the United States, where candidates invest more than half of their campaign budget in television advertising, the usual term is ads or spots. Electoral ads as we know them in the United States are thus equated with commercial ads and, therefore, "paid media." They are also often associated with time being purchased and electoral broadcasts being very short. In other countries, particularly in those where broadcast time cannot be purchased, researchers tend to avoid the term ads. In the Western European countries where public broadcasting has long dominated the market and the public service philosophy is still present, parties and candidates are mostly provided with free broadcasting time to be used for their advertising. Researchers from these countries often shrink from calling these electoral messages ads and instead use the term political electoral broadcasts (e.g., United Kingdom), polispots (Greece), or, in the English translation of the Italian term, independently produced political messages

(Italy). However, if a country allows electoral advertising in both public service broadcasting and commercial broadcasting, as in Germany, it still remains an open question whether the broadcasts in both systems are indeed that much different. In fact, German parties tend to use the same ad for both broadcasting systems and only shorten it for broadcasting on commercial television. In any case, the use of different terms can be regarded as one indicator of the diverging attitudes toward political advertising across countries.

POLITICAL SYSTEM DIFFERENCES

The political system and the electoral system go hand in hand with the role of the parties. In almost all countries that are included here, parties play a dominant role on the political scene; the United States is the exception. Although there are other countries with a presidential system (Latin American countries, for instance), it is in the United States that the candidate orientation of the presidential system has led to a decline of parties. Elsewhere, the parties mostly remain in a dominant role. This is definitely the case for parliamentary systems. In spite of trends toward personalization and a focus on individual candidates, campaigning overwhelmingly lies in the hands of parties. This is reflected in Table 1.1, which shows, for a sample of 28 countries from different parts of the world, that during parliamentary elections spots are sponsored by parties everywhere except the United States.

Sponsorship does not necessarily mean that advertising time is paid time. In many countries, advertising time on television is provided free during elections. However, if this is the case, time is allocated to parties and not to individual candidates. Where parties do not have to pay for advertising time in the media, they still have to pay for the production of the spots.

The strong role that parties play in most political systems is also indicated by the fact

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that even in presidential elections, sponsorship of television advertising does not lie with the candidates. Table 1.1 also gives an overview of sponsorship of spots during presidential elections. Half (14) of the 28 countries listed have direct elections of the president. Among countries that do not elect a president directly, several are monarchies, such as Spain, the Netherlands, and the United Kingdom, where a queen or a king is the nominal head of state. In other countries, the president is not elected by the people directly but instead determined by the parliament or another electoral committee. Campaigning in the real sense of the word and thus electoral advertising can only be expected in those countries where the president is elected directly by the people. In several cases, it is still the parties that are responsible for the sponsorship of ads on television. This is primarily the situation in Europe, where only the new democracies of Middle or Eastern Europe have adopted a system of candidate sponsorship for the spots in presidential campaigns. Candidate sponsorship thus can also be regarded as an indicator of the role the president plays in a political system: In most Western European countries, with France being the clearest exception, the president, though being nominally the head of state, is in fact in a secondary role compared to the prime minister.

The electoral system of a country can be expected to have a major impact on campaign strategies and thus on the design of electoral advertising (Roper, Holtz-Bacha, & Mazzoleni, 2004). For example, strategies may vary according to the number and size of parties running in a race. If elections usually lead to clear majorities and single-party governments or usually end up in coalitions of two or more parties, such a system can also impinge on campaign and advertising strategies because campaigners may, for example, refrain from negative advertising against future or former coalition partners. Thresholds that parties must overcome to be represented in the parliament

Table 1.1Sponsorship of Spots and Electoral Systems

Country	(Direct) Presidential Elections Held?	Sponsor of Ads	Parliamentary Election Ad Sponsors	Electoral System ^a
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Argentina	Yes	Parties	Party	Proportional representation
Australia	No	٩ 	Party	Majority vote
Austria	Yes	Parties	Party	Proportional representation
Belgium	No		Party	Proportional representation
Brazil	Yes	Parties	Party	Proportional representation
Bulgaria	Yes	Parties	Party + candidates	Proportional representation
Canada	No		Party	Majority vote
Chile	Yes	Parties	Party	Binominal system
Czech Republic	No		Party	Proportional representation
Estonia	No		Party	Proportional representation
Finland	Yes	Parties	Party	Proportional representation
France	Yes	Candidates	Party	Majority vote
Germany	No		Party	Proportional representation
Greece	No		Party	Proportional representation
Israel	No		Party	Proportional representation
Italy	No		Candidates + party	Majority vote
Japan	No		Party	Segmented system
Latvia	No		Party	Proportional representation
Lithuania	Yes	Candidates	Party	Segmented system
Mexico	Yes	Parties	Party	Segmented system
Netherlands	No		Party	Proportional representation
Poland	Yes	Candidates	Party	Proportional representation
Portugal	Yes	Parties	Party	Proportional representation
Russia	Yes	Candidates	Party	Segmented system
South Korea	Yes	Candidates	Party	Segmented system
Spain	No		Party	Proportional representation
United Kingdom	No		Party	Majority vote
United States	Yes	Parties + candidates	Candidates	Majority vote

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b. The dash is an indication that there were no presidential elections, so there could be no sponsors.

are another factor exerting an influence on the strategies used in campaign advertising. The electoral system may also lay the ground for the allocation method for free advertising time, which can be equal for all parties, proportional according to the strength of a party in earlier elections, or based on other criteria.

Table 1.1 provides an overview of the electoral systems in the countries included in our survey. For the sake of clarity, the variety of electoral systems that exist across the world has been reduced here. As can be seen from the table, the majority of countries follows some kind of proportional representation. However, it should be noted that there is much variation in proportional systems. Only some countries apply a pure proportional system; most combine proportional representation with elements of majority voting. Germany, for example, has developed its own special model of a personalized proportional system, which was adopted by New Zealand in 1993 (Roper et al., 2004). Proportional systems also differ according to the formula (quota) used to distribute seats among parties. In segmented systems (also called parallel systems), two electoral systems are applied separately, with one group of candidates elected according to majority vote and the others according to a proportional system. Finally, Chile has a singular electoral system that more or less forces the parties to form electoral alliances. (For more extensive information, see Blais & Massicotte, 2002; Nohlen, 2000; Powell, 2000.)

ELECTORAL BROADCASTS

In addition to the differences in the political systems, the specific features of the media systems should be of relevance because of the importance of political advertising and its formats in the different countries. This concerns the media system in general and, more specifically, the structure of the broadcasting system, as well as the function or status of the different media from the perspective of the audience. The countries represented in this book again differ considerably in the historical development of their broadcasting systems, and this has consequences for current structures and, finally, for the regulation of political advertising. Commercial broadcasting and competition among several television companies have a long tradition in the United States, but such systems were only introduced in most West European countries in the 1980s. Today, these countries feature dual systems, with public service broadcasting remaining a major player in the market, and thus the social responsibility philosophy of the public service model is still very much alive. The Eastern European countries, where the media were in the hands of the state or the ruling parties for more than four decades after World War II, restructured the media systems after the political changes of 1989 and have also built up dual broadcasting systems. However, because it did not have the long tradition of public service broadcasting, this part of the system often is in a weaker position than in Western Europe. The public service idea has also been exported beyond the European continent. Chile, for example, reformed its formerly government-run and then military controlled television network according to the BBC model after the end of the Pinochet dictatorship in 1993.

The development of distribution technologies, the emergence of dual broadcasting systems, and the ensuing commercialization process have led to a radical change in the situation of the broadcasting media in general and of political broadcasting in particular. Overall, competition has increased, mostly to the disadvantage of political contents. Where television stations strive to attract the biggest audience possible in the interest of their advertising clients, politics has to adapt to the rules of the game, meaning it must adopt an entertainment format or end up in a marginal role.

With the multiplication of channels, the number of outlets for political advertising has increased. However, those countries in particular 1.

Country	On Commercial TV	On Public TV
Argentina	Yes	Yes
Australia	Yes	No
Austria	Yes	No
Belgium	No	No
Brazil	No	No
Bulgaria	Yes	Yes
Canada	Yes	Yes
Chile	No	No
Czech Republic	No	No
Estonia	Yes	No
Finland	Yes	No
France	No	No
Germany	Yes	No
Greece	Yes	No
Israel	No	No
Italy	Yes	No
Japan	Yes	No
Latvia	Yes	Yes
Lithuania	Yes	Yes
Mexico	Yes	No
Netherlands	Yes	No
Poland	Yes	Yes
Portugal	No	No
Russia	Yes	Yes
South Korea	Yes	Yes
Spain	No	No
United Kingdom	No	No
United States	Yes	No

 Table 1.2
 Purchase of Time on Television

that have a long tradition of public service broadcasting did not automatically open up the commercial television sector for electoral advertising. Those that did did not necessarily allow candidates or parties to freely purchase broadcasting time. Table 1.2 shows where advertising time can be purchased in the public or commercial television sector.

The picture that emerges here is quite clear. Public television is mostly out of bounds for the purchase of advertising time. Only some countries allow for advertising time to be purchased on public television, and these are countries not in the traditional public service zone of Western Europe. Commercial television, on the other hand, has indeed brought new possibilities for electoral advertising, with many countries giving candidates or parties the opportunity to expand their presence on the screen during election campaigns. It must be kept in mind, however, that these tables only include countries where electoral advertising on television is allowed in one way or the other; countries that do not have any electoral advertising on television at all are not represented.

In addition to, or instead of, allowing for the purchase of advertising time, many countries allocate free broadcasting time to parties or candidates during electoral campaigns. Thus these countries keep campaign broadcasts under control by fixing the time span during which electoral advertising is broadcast, the method of allocation, the amount of time, and

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Country	No Free Time	Free Time on Public TV	Free Time on Commercial TV	Free Time on Both Public and Commercial TV
Argentina		х		
Australia		х		
Austria	х			
Belgium		х		
Brazil				х
Bulgaria	х			
Canada				х
Chile				Х
Czech Republic		Х		
Estonia	х			
Finland	х			
France		Х		
Germany		Х		
Greece		Х		
Israel				х
Italy			Х	
Japan	х			
Latvia		Х		
Lithuania		X		
Mexico	х			
Netherlands		Х		
Poland		Х		
Portugal				Х
Russia		Х		
South Korea	х			
Spain		Х		
Switzerland	х			
United Kingdom			Х	
United States	х			

Table 1.3	Provision	of Free 1	Political	Television	Advertising T	ime
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the number of slots that are given to campaigners. In some cases, further restrictions apply to the contents of the free-time broadcasts. Table 1.3 gives an overview of which countries provide free air time and if so, if that is on public or commercial television.

Free time provided on public television is the most common model in our sample. There are only a few exceptions, with some countries according parties or candidates no free segments at all or only on commercial television. The provision of free broadcasting time on public television seems to be closely connected with the public service philosophy that still very much rules the Western European countries. Against this background, the cases of Austria, Finland, Italy, and the United Kingdom merit further discussion because they have chosen a different path. Austria and Finland do not provide free air time on any system but allow parties to buy advertising time on commercial television. Finland, which is therefore regarded as the "odd case" among the Nordic countries (see chapter 11), lifted the ban on paid political advertising and has allowed for purchase of advertising time on commercial television since 1991. Austria only recently changed its law: Until 2002, when a

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new law was passed that abolished the old regulation, public television allocated free time for parties during election campaigns. However, they are allowed to purchase time on commercial television. The snag is that public television in Austria had a monopoly until a couple of years ago. Now commercial broadcasting is allowed, but still there is only a limited number of private stations and only one with a nationwide schedule. Acquiring party advertising carried by "windows for Austria" on German or other international commercial television channels has thus gained more importance than buying broadcast time on the Austrian commercial outlets.

The history of electoral advertising in Italy is of a more colorful nature. Campaign ads were broadcast by the commercial stations until a new law was passed in 1993 that banned spots during the hot campaign phase. The former regulation allowed for purchase of an unlimited number of spots. In 2000, a new law obliged the local commercial stations to provide free air time and be reimbursed by the state. In addition, it is possible to buy extra broadcast time on the same channels. The public service network, RAI, however, remains completely ad free.

The situation is somewhat similar in the United Kingdom. The "mother of public service broadcasting," the BBC, which does not air any commercial advertising at all, was kept free from political advertising as well, but commercial television provides free air time for electoral broadcasts.

Different models are applied if air time is allocated to parties or candidates. Although election laws or other campaign regulations usually prescribe equal treatment for all competitors, that does not necessarily mean an equal amount of time is given to each of them. In fact, most countries apply a system of proportional allocation, with bigger parties receiving more airtime than the smaller ones.

Ads that must be purchased tend to be very short, but there is much variety in the usual

length of the free broadcasts. Some countries provide parties and candidates with long time segments or started out with 20- or 30-minute broadcasts. In the first elections in 1993, Russia gave parties 20-minute slots, which were deemed far too long, and the country therefore cut down the time allocated to campaigners. In other countries, free time for parties is much shorter and approaches the same length that parties use when they have to pay for advertising time. An exemplary case for this development is Germany. Here, parties were allocated 5- to 10-minute slots when political advertising was first introduced on television in 1957. Over the years, the time for individual slots was reduced and has now reached 90 seconds, and 30 and 45 seconds are the usual lengths parties use when they purchase time on commercial television.

In addition to regulations as to where electoral advertising is allowed and whether air time can be purchased, further restrictions apply in most countries. Again, the United States is the exceptional case: Electoral advertising has no limits at all. Several countries impose restrictions on the amount of money the parties or candidates are allowed to spend for their television advertising. Of the countries represented here, this is the case in Argentina, Canada, Latvia, Lithuania, Mexico, Poland, and South Korea. According to Mexican law, for instance, the total amount spent for television advertising should not exceed 20% of the public financing for parties during presidential elections and 12% for congressional elections. It is estimated that candidates and parties spend up to 80% of their public funds for advertising on television. Poland sets a general limit for the advertising campaign in parliamentary elections. Similarly, there is a limit for the total amount of money that parties are allowed to spend for their campaign in Latvia and Lithuania.

There also exist diverse provisions concerning the contents of the electoral broadcasts. These mostly apply to the video part of the

ads. In Israel, for example, the broadcasts must be approved by the Central Committee of Election. Broadcasts can be prohibited if they divulge security secrets or if they use soldiers or abusive language. Italy and Japan in general do not allow negative advertising. Electoral ads in Mexico fall under the free speech article of the Constitution and are supposed to avoid any affront, defamation, or slander that may denigrate candidates, parties, or other institutions. However, this provision is infringed easily without being sanctioned in any way. As for advertising in general, Bulgaria does not allow electoral advertising to feature the state's coat of arms and the national anthem. France is particularly restrictive, prohibiting the use of public buildings and the national anthem and restricting the amount of preproduced videoclips that can be used. In Finland, regulations on content are different according to the broadcaster concerned. The biggest commercial broadcaster, MTV3, rules that only image advertising for parties and other organizations can be inserted. Advertising for single candidates is not allowed, to avoid the appearance of a candidate in an ad and in the program following the ad. Although parties and organizations can be judged and compared, negative assessments of electoral candidates are not allowed. These are special regulations MTV3 has put up; the second largest channel (Nelonen) simply applies the regular advertising rules to political advertising as well.

Even if air time can be purchased by parties or candidates, the time period for electoral advertising and the number and length of the broadcasts are often limited. In Mexico, for example, the law prescribes the maximum number of hours of electoral ads in any presidential elections: Ad hours are not to exceed 250 hours on radio and 200 hours on television. This total number of hours is divided proportionately among all presidential candidates according to their party's current percentage in congress. Candidates without any representation in congress receive 4%. Of the remaining number of hours, 30% is distributed evenly to all parties regardless of their percentage in congress and 70% proportionately according to their strength in congress. The same regulation is applied for congressional elections, but advertising time is restricted to 50% of the amount available for presidential elections.

CONCLUSION

This overview of just a sample of 28 countries leaves a mixed picture. The United States stands out, with its complete openness toward political advertising and the great importance that campaigners attach to television ads. The only common characteristic for the other countries is that all have some restrictions. Even where electoral advertising has acquired a major role as a campaign instrument, there are always some limitations. Why electoral advertising is restricted and which limitations apply can in some cases be traced back to influences from the specific political, electoral, or media system. However, even countries with similar contexts differ in their regulation of political advertising.

The same is true for the role television advertising plays in electoral campaigns. In a questionnaire that we used in advance to collect data on the regulation of electoral advertising in the different countries, we also asked our respondents to rate the importance of electoral advertising on television compared to other campaign channels. Ratings were given on a seven-point scale ranging from 1 (not important at all) to 7 (most important). In general, the importance attributed to television ads is rather high in the countries considered here. Compared to other paid media, electoral advertising on television received a mean score of 5.54 (n = 28). However, with a value of 1.66, the standard deviation was quite high. The lowest score (1 = not important at all), for example, was given for Senegal, the highest (7 = most important) for Bulgaria and Mexico. Compared to other campaign channels in

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general, the overall rating was somewhat lower, reaching 4.81 (n = 28). In this case, the standard deviation was even higher (1.84), thus reflecting the diverse situation of electoral advertising in the countries represented here.

Against the background of this more or less heterogeneous picture, it appears necessary to dig deeper into the history and current situation of political advertising of individual countries. The chapters in this book all follow a similar structure and thus allow for comparison of the development of political advertising across countries. After chapter 2, which provides an overview of the methodologies used to study political advertising, the chapters are organized around the central features of each country or region's use of political advertising. Standing alone in the first section is the United States, the only system in the world wherein all television advertising is provided solely through a private, commercial television system in which time is purchased by candidates and parties, and no time is given free on either commercial or public channels. The second group of chapters discusses the political advertising in countries where the public system of broadcasting provides free time to candidates or parties, but no time can be purchased for political advertising on either public or commercial television. A third grouping of countries represents the dual broadcasting systems in which various combinations of public and private commercial broadcasting can result in candidates and parties both being given free time and purchasing time on a variety of different broadcasting outlets. In the last section, this volume presents review and analysis of how political advertising is evolving in new and developing democracies around the world. A concluding chapter provides some comparisons of research findings on the content and effects of television advertising around the world.

NOTE

1. If not noted otherwise, this overview is based on data provided by the authors of the country chapters in this book. In addition, we thank the following colleagues for information about the situation of electoral TV advertising in their country: Roger Blum (Switzerland), Peter Filzmaier (Austria), Gustavo Martinez Pandiani (Argentina), Fabro Steibel (Brazil), and Stefaan Walgrave (Belgium).

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