

Content Regulation in the Fourth Industrial Revolution

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Context

1. The Fourth Industrial Revolution

The world is at an early stage in the Fourth Industrial Revolution, which involves the integration of advances in artificial intelligence, robotics, nanotechnology, additive manufacturing, genetic engineering and biotechnology, amongst other disciplines. Artificial intelligence and robotics will have a particular impact on the job market, as they could displace most current forms of employment over the next two or three decades. New forms of economic activity will undoubtedly emerge, but they will require different skill sets.

It is essential to prepare for this radically different future. The challenge is that many of our current legislation, policies and regulations and educational systems were designed in a bygone age; most of these are already outdated, and they will not support a transition to the new era.

2. The Global Picture

The convergence of communication platforms has resulted in an exponential increase in the volume and variety of content available to consumers. News, communications, information, entertainment, education, directions, home management, commerce and many other services are all now just demarcated flows in an ocean of data that can be streamed to the nearest convenient screen. Citizens (in countries with open access to the internet) can access largely unfiltered information through various devices and apps, and the flow and reach of content are no longer controlled or limited by infrastructure, device or geography.

It is an age of ubiquitous information, but there are still fast and slow lanes on the information superhighway. The USA, the EU and to a lesser extent China are the major global rule-setters, with markedly different philosophies; the rest of the world has to operate systems that comply with their requirements. Over half of the world is now online, and most of the rest – at the current rate of internet expansion - will be online in another decade or so. However, there are still large gaps in the world's connectivity, most obviously Africa, which still accounts for just 11% of internet use. This is partly because the necessary infrastructure is still being rolled out, but there are still issues with cultural acceptance and a lack of local content. Cultural acceptance tends to come with time, but the lack of local content is still important, as it is local content that helps the internet feel familiar to first-time users. A related issue is that over half of all internet content is in English, about 80% of internet content is in one of the world's top ten languages, but there is little or no internet content in the rest of the world's 7,000

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languages. Fortunately, technology can solve some of these problems. For example, pages can now be automatically translated, and the number of languages available is increasing rapidly.

A much more difficult challenge is that a small group of technology companies now control the public spaces on the Internet where people meet, talk, trade and connect. This is largely because the value of a public space goes up as more people use it, so these spaces have a natural tendency to become monopolistic. The risk of this concentration of influence, however, is the potential for abuse, and extremists, political manipulators, criminals and terrorists are now very active in some of the spaces. Facebook in particular is now subject to sustained criticism for its unwillingness to properly police the public space that they control.

The ownership of the main social media platforms is much more concentrated than most people realize. Facebook, which has the most users (over two billion), also owns WhatsApp, which has the third largest number of users (1.5 billion), and Instagram which has 1 billion users. The second largest social media platform is YouTube, with 1.9 billion users, which is owned by Google, which controls about 77% of all internet searches, while Amazon controls about half of the cloud, more than the next three biggest companies combined. So just four or five companies currently control the internet world.

When oil and then the telephone system became monopolies on that scale, governments had to intervene to break up the giant corporations and reintroduce competition to the market. The technology companies, however, have argued that their dominance could be quickly overturned by the next technological innovation, so they are still exposed to competition. Legislators largely accepted this argument until recently, but they are now less inclined to do so in the wake of revelations that social media is being used to spread hate speech, lies and propaganda, and influence the outcome of elections.

The problem is that most users are happy to allow the technology companies access to every aspect of their lives, although they are not usually aware of how much personal information they are disclosing. They will let the technology company track their movements, see their contacts, monitor their online and offline activity, their banking, work and social life, shopping and sexual preferences, all in exchange for a 'free' App or access to the public space. This allows a small group of technology companies to control most aspects of the networked society, which puts them in the most powerful and privileged position in modern civilization. This brings with it an extraordinary potential for even more serious abuse of power in future. This can be seen in China today, where the Government is now using the internet to suppress dissent; people deemed to be guilty of 'anti-social' activity can now be prevented from travelling, accessing public facilities or obtaining particular jobs.

3. The Local Picture

In less than a decade, technology companies like Google, Amazon and Facebook have captured much of the market for content. They now dwarf the traditional media companies. In spite of this dominance, the technology companies say that they are not like traditional publishers (who have legal responsibility for what they publish); they are merely providing a platform, and so should not have the same

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responsibilities as publishers. Legislators largely accepted this view, until recently, but many are now concerned about the way that the unregulated power of the technology companies has allowed them to destroy their rivals and dominate media and information.

As a result, media firms (including the media firms in Jamaica) are no longer operating on a level playing field; they now are competing against technology firms that operate, largely unregulated and untaxed, and are capturing most of the advertising revenue. As a result, most of the traditional media organizations are bleeding to death, they are losing their audience and income. Over the last decade, hundreds of traditional media companies around the world have shut down, forced out of business by technology firms that don't even have an office in the same country.

If our regulatory systems do not now adapt, they will make this situation much worse. Most of them were written in the era before the technology firms captured the market, and are almost entirely focused on the traditional media as a result. If they are not reformed, they will bring increasingly disproportionate pressure to bear on the dwindling band of traditional media providers, which will encourage even more consumers to abandon them and migrate to unregulated and informal sources.

These same trends can be seen in Jamaica, where the number of internet users doubled in nine years from 917,000 in 2007 (when tracking began) to 1,747,000 in 2016. Over the same period, the number of cable users fell by half, from 839,000 in 2005 to 482,000 in 2016, CVM's television revenue fell from \$735M in 2010 to \$226M in 2017, RJR's revenue (mostly from TVJ) fell from \$722M to \$554M in 2018, Flow's subscribers declined by 3.37% between 2014 and 2018, from 116,962 to 113,022 customers, Digicel's subscribers fell by 2% between 2016 and 2018, from 46,243 to 45,308 customers, while the potential audience for Free-to-Air TV fell from 1,737,000 in 2005 to 1,356,000 by 2016 (although the market share for Free-to-Air did increase by about 1% between 2014 and 2016). Local Free-to-Air Television is likely to suffer further loss of audiences and revenues, because it is heavily dependent on advertising, although it may do better than international cable, which relies on subscription.

With regard to content providers; the 15th most-followed blogger on Instagram in 2018 had nearly 80 million followers and earned US\$480,000 per sponsored post, while the most popular had 136 million followers and earned US\$800,000 per sponsored post. These individuals have a readership, influence and income that is larger than all the traditional media content providers in Jamaica combined.

The traditional media firms in Jamaica are therefore looking in the wrong direction. They are fighting each other for a share of a shrinking market and for their survival, but their real competition is now coming from technology firms and content providers outside Jamaica.

The situation could still turn around, however, as the long-awaited switchover to digital television and the roll-out of 5G networks in Jamaica could give the media companies the opportunity to surge back into the market place. The rapid uptake of DVB-T2 (in Europe) and ATSC 3.0 (in South Korea, soon in the USA) by OTA broadcasters suggests that they see this as a great opportunity to offer more channels at higher quality and lower cost. If the traditional providers switch to internet-based distribution, they will at last be able to compete directly with online service competitors. In the longer term, the viability of the

traditional providers will largely depend on their ability to monetize content across platforms and develop new sources of revenue (such as mixed-models of free-to-view advertising-supported content, a la carte subscription options, and bundling of OTT offerings with conventional content).

The generic free-to-view model will probably continue to dominate, however, because it has become the standard mode of operation for technology and social media companies. They provide content, including apps, for 'free'. In practice, of course, this is not 'free', it is actually in exchange for personal information, which the technology company can then convert into advertising revenue.

4. Direction of Travel

The profound changes in the media and communications market have left Jamaica badly exposed. It has become clear that Jamaica's current legislation, policies, institutions and regulations on media and communications are badly in need of modernizing and reform. Some of the key issues now are as follows:

i. The need for media literacy

The priority for Jamaica now is no longer accessibility, as almost everyone in the nation has a phone and can choose a data plan, but **media literacy**. Having access to the internet is only the first step; people have to know how to use the internet to change the way they live, learn and work. The country needs citizens who are highly internet-literate, are confident creators and consumers of content, and have the technical and social skills needed to participate in the Fourth Industrial Revolution¹.

ii. The need for content regulation.

Content now flows seamlessly across borders. Consumers are able to by-pass traditional networks (and also their safeguards). This creates many new opportunities for people to participate in the digital economy, not as passive consumers but as **prosumers**, i.e. both consumers and creators of content.

However, it has also become clear that the digital world brings with it many serious problems, which we have not yet learned to manage or control. These include unfiltered access to pornography and ultra-violent content, hate speech, unethical advertising, internet addiction disorder, cyberbullying, grooming and revenge porn (some young people have been induced to commit suicide as a result of cyberbullying and grooming by predators); cybercrime (now the

¹ Current levels of digital literacy are still low, according to a recent study led by Professor Paul Golding of the University of Technology, which found that most students did not know how technology impacts their behaviour. They were not using apps and platforms for civic engagement, 60% had never posted a video clip they made, 54% had never posted a video or audio file of themselves doing something, and 53% had never posted a story or artwork they created ("*Young Jamaicans in a Hyper-Connected World: Life Online*", November 15, 2018).

largest and most lucrative form of crime in the world), including scamming, phishing and bank hacks, identity theft, fraud and resale of stolen credit card details on the dark web; narcotics distribution, which has also migrated onto the dark web; and terrorist recruitment across social media platforms, which has allowed organizations such as Islamic State to reach out to disaffected youth across the world, bypassing all border controls, and convince them to carry out lone wolf attacks in their own countries.

iii. The need for standards and controls

As the population shifts to online sources, the traditional media have rapidly become less profitable as advertising has migrated along with the eyeballs. Many newspapers have closed, other media houses are being pushed into mergers or desperately trying to find new sources of revenue in order to survive. As their profitability has eroded, all but a few are losing much of their primary news-gathering and fact-checking capacity, and some are now just pulling their news off the web in a process that has become self-referential. The loss of the fact-checking gatekeepers and the increasing reliance on trending topics makes it difficult for many people to distinguish between fake news, internet gossip and reliable sources of information.

The diminution of authoritative and independent sources of news also means that many people now obtain their information from closed loops of like-minded individuals in the same social media groups, which encourages political tribalism and more extreme views, increases vulnerability to fake news and manipulation via social media, and thereby starts to undermine the basis of tolerance that is the foundation of democracy and participation in society.

Foreign intelligence services, terrorists or others with malign intent are now adept at using this aspect of social media to manipulate people, inflame emotions and destabilize countries. Russian interference in the 2016 US presidential election via social media was particularly widespread, and included attempts to increase ethnic tension and encourage religious and political extremism, but Russia's psychological operations (PSYOPs) on social media in the USA are now known to have been running for some years prior to 2016. Their goal was to erode trust in US democratic institutions, so they urged African-Americans to boycott the election, encouraged right-wing sympathizers to be more confrontational and told Mexicans and other immigrants to distrust the state. Some of these initiatives appear to have been successful; black voters strongly favoured Clinton over Trump, but may have been affected by widely-circulated disinformation (such as the story that Clinton had accepted funding from the Ku Klux Klan). Possibly as a result, black turnout declined in 2016 for the first presidential election in 20 years, according to the US census bureau, falling to less than 60% from a record high of 66.6% in 2012².

² Russian propagandists targeted African Americans to influence 2016 US election

<https://www.theguardian.com/us-news/2018/dec/17/russian-propagandists-targeted-african-americans-2016-election>

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The extent of Russian involvement makes it conceivable that they gave Trump the advantage in the election. 2017, the Russian agency leading the PSYOPS campaign, the Internet Research Agency, had 187 million engagements with users on Instagram and 77 million on Facebook. They also infiltrated internet games, including Pokemon Go, browser extensions and music apps to encourage political division, and they used specific follower requests, job offers and helplines to get people to unknowingly disclose sensitive information that could later be used against them and induce them to perform additional services for Russia³.

In another high-profile case of social media manipulation, a company called Cambridge Analytica acquired millions of profiles of US citizens and used it to build a software program to predict behaviour and influence voters. Some of the data was collected through an app built by an academic who was given access by Facebook to an anonymized dataset of Facebook friendships for research purposes. However, the app also harvested the information of the participants' friends, which allowed for the accumulation of behavioural data from tens of millions of Americans. This allowed for micro-targeted fake news that would anger the recipient, which would then encourage re-tweeting; this would make it appear to be a widely-held view and provide apparent 'verification' of the original fake item. It is now of great concern in the Caribbean that SCL, the parent company of Cambridge Analytica, has been involved in politics across the region; in St. Vincent and the Grenadines in 2009, in St. Kitts and Nevis in 2010, in St. Lucia in 2011, and in Trinidad and Tobago in 2010 and 2013.

There is no certainty, as yet, about the extent of the impact of social media manipulation of political campaigns, but in elections with a close margin of victory, such as the Trump election or the UK's Brexit referendum, it is possible that political manipulation via social media could determine the outcome of an election. The extent of the influence is likely to be greater in relatively weak democratic states.

Of even greater concern is that riots and lynchings around the world have been linked to misinformation and hate speech on social media, primarily Facebook and WhatsApp, which push whatever content keeps users on the site longest — a potentially damaging practice in countries with weak institutions. In Indonesia rumours spread on Facebook and WhatsApp that gangs were kidnapping local children and selling their organs; locals in many villages lynched outsiders they suspected of coming for their children. Social media rumours have led to attacks in India and Mexico. Lynchings have been filmed and posted back to Facebook, where they go viral. In Sri Lanka, Sinhalese-language Facebook groups, goaded on by extremists with wide followings on the platform, have attacked Muslims, destroying businesses and burning people alive. In Jamaica, there are concerns about the use of social media by gangs and criminals to recruit disaffected youth, publish heinous crimes (e.g. rapes and murders), and carry out acts of extortion and

³ Russia used all major social media platforms to aid Trump: report

<https://www.aljazeera.com/news/2018/12/russia-social-media-network-aid-trump-election-181217191309002.html>

intimidation (e.g. threatening victims, family members and witnesses to crime). There is also a serious problem with people who take and circulate pictures of victims dying at accident and crime scenes; there have been a number of recent cases where people have lost family members and then seen the death of their loved ones being used as entertainment on social media.

iv. The need for action

A number of governments are now preparing to take steps to regulate social media. In the UK, for example, a report of the House of Commons Digital, Culture and Sports Committee made recommendations for reforms that address political advertising online, social media manipulation and fake news. These included:

- Rejection of the term 'fake news', and substituting an agreed definition of the words 'misinformation' and 'disinformation' with clear guidelines for companies, organisations, and the Government to follow and which can be used as the basis of regulation and enforcement across the platforms;
- The need for audits of the security of social networks;
- Updating the rules on political campaigns to make them fit for the digital age; and
- A new tax on technology companies to fund digital literacy programs.

The Committee also recommended that existing tried-and-tested content standards for broadcasting should be the basis for setting standards for all online content.

The UK's communications regulator, OfCom, has also published a discussion paper on harmful online content, which takes a more cautious approach. It suggests that broadcasting rules cannot simply be applied online, mainly because of the sheer volume of content generated or shared by online platforms, the enormous diversity of online content (which includes user-generated content and conversations), the fact that many online platforms do not create content accessed by their users, difference in context and audience expectations between broadcast and online sources, and the multinational nature of online platform operators. OfCom therefore took a principles-based approach, i.e. they identified principles from broadcasting regulation which could form the basis for a framework for online protection. The main principles are:

- Protection and assurance against harmful content and conduct, reflecting societal norms and setting clear standards that regulated parties are required to adopt in their practices and procedures.
- Upholding freedom of expression. In the online world this might mean paying more attention to the processes that platforms employ to identify, assess and address harmful content, as well as to how they handle appeals.

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- Adaptability over time to allow for changing consumer behaviour and expectations, and innovation by industry in developing better ways to protect users.
- Transparency about the rules underpinning the regulatory regime, including availability of information to consumers about how platforms decide what content is shown or given prominence, and the source of specific content.
- Enforcement, involving appropriate sanctions to deter bad behaviour.
- Independent regulation, to build credibility and public trust.
- Public consultations to inform all future changes to regulatory requirements.

OfCom also identified the most pressing priorities for online standards. These were:

- The protection of minors across all sources and types of content.
- Protection from illegal or harmful content in viewing or online interactions, including exposure to hate speech, the promotion of terrorism, encouragement of suicide, self-harm or violence, bullying, harassment or trolling, disinformation and 'fake news'.
- Mandatory provision of information to users to allow them to make a more informed assessment of material they view online, i.e. whether it is factual or fictitious. This could include greater transparency requirements for the algorithms used to rank search results.

The UK Government is also considering creating an eSafety Commissioner, with the power to investigate and fine the social media providers. Australia has had an eSafety Commissioner since 2015; they have the power to enforce the removal of problematic material such as revenge porn and cyber-bullying posts. Failure to do so can result in the social media companies being fined up to A\$525,000 per day, and the original poster being fined up to A\$105,000. The UK Government is considering extending these powers to include the protection of people with visible disabilities and skin conditions, some of whom have had their online photos taken and used as the subject of mockery and vile abuse.

v. The need for action in Jamaica

The Broadcasting Commission commissioned a survey, conducted in October 2018, which revealed that the public was now 'extremely concerned' about the extent to which children in Jamaica are now exposed to a range of serious online dangers. About 87% of Jamaicans said that their greatest concern was that their children might see pornographic videos involving children. Other major concerns about online risks to children were exposure to violent and pornographic material, including 'revenge porn', and human trafficking. Jamaicans are also very concerned about fake news (70%) and exposure to graphic videos and images from accident and crime scenes filmed by bystanders on their cell-phones then circulated on social media.

Other findings from the survey were that 82% of Jamaicans felt that TV ratings are very important, 65% used TV ratings to guide their decisions on suitability of shows for children and 69% said they needed to be present during PG-rated shows to guide children. The overwhelming majority of Jamaicans (82%) said they wanted the Broadcasting Commission to educate the public on how to protect themselves and their families online. They agreed that protection against malicious and harmful online content was important and necessary, especially for young people who are increasingly able to access unrestricted content.

vi. The need for transparency, neutrality and regulatory independence

Content regulation always involves a complex set of issues. There are risks and trade-offs between liberty and social harm, and between excessive and ineffectual regulation. So it is important to have clarity about the intended purpose of any given regulation, and to find the cheapest and most effective way to achieve a given goal. In this case, the goal of content regulation is to support Jamaica's transition to a digital world, which involves moving business, commerce, government, education, health care, media and most aspects of personal life online, which in turn requires ensuring that people can have confidence in the freedom and safety of public spaces. Sadly, public spaces do not remain free and safe unless they are protected; there will always be a need to guard against malice, fraud, bullying and manipulation. It is very important that the rules for public spaces are clearly justified, and are developed and enforced in a very transparent and apolitical manner.

vii. The case for convergence

Convergence does not mean just forcing together agencies and staff. It means developing common principles for regulating across platforms.

There is no one model for convergence. In Gibraltar, for example, there is a converged regulator, the Data Protection Commissioner, which has responsibility for telecommunications, broadcasting, radio communications (spectrum management) and postal service. In Australia and South Africa, however, relevant departments have merged, but skills, deployment and capacity remain separate; support services (such as accounts, HR and legal) are in common, but operations are segregated by services and platform. As this suggests, putting people under a single roof and calling it 'convergence' does not necessarily increase efficiency or even reduce costs much.

There is a stronger case can be made for content regulation across the audio-visual continuum, which would include broadcasting, cinema, video games, social media, virtual and augmented reality and artificial intelligence applications. There is no regulator that has yet adopted this model; OfCom, for example, sees a spectrum from direct regulation to self-regulation for newer media, but this is probably a transitional arrangement as new media eventually becomes just another part of the landscape.

It is also now clear that it is not realistic to rely on self-regulation by technology companies to address the current array of problems, as they have already failed to do so. As a result, major stakeholders in the UK, including broadcasters and internet service providers, are now urging the government to create **a new, dedicated, independent regulator** to help tackle fake news, child exploitation, harassment and other growing issues online.

With regard to network and infrastructure convergence, previous proposals have been limited to the traditional areas of broadcasting, telecommunications and spectrum. It is now clear that this is too narrow, as the fourth industrial revolution will allow infrastructural convergence far beyond telecommunications, broadcasting and spectrum. The next phase will include the internet of things and network convergence across industries (including smart cities, smart road networks and autonomous transport systems, smart grids, and smart industrial systems, with businesses linked into waste-trading symbiotic groups as part of a larger circular economy), so any system devised now should also be ready to support these further steps toward greater interconnectivity. This therefore requires an all-encompassing review, reform and modernisation of the rules and institutional framework which govern infrastructures and services. This should include a review of spectrum policy and regulation, with regard to maximising revenue, promoting competition, and ensuring wider coverage, higher quality of service, national security, disaster communications, higher system capacity and device connectivity. In the USA, for example, the FCC has prioritised reforms that will eliminate the high cost and review process for cell towers in order to facilitate next-generation networks which will be small cells (the size of a backpack), replacing today's large cell towers. In France, the government has agreed with industry to deliver coverage everywhere in exchange for spectrum, without paying fees, in order to achieve universal coverage with high-speed connectivity by 2020.

viii. **The BCJ's actions to date**

Jamaica's high rates of homicide and violence, with many disaffected youth, low levels of literacy, poor parenting and broken families means that Jamaica is particularly vulnerable to the penetration of social media by organized crime and terrorist networks, who thrive in this type of environment.

Jamaica therefore needs a forward-thinking and nimble regulator to guard against harmful content, exploitation of the vulnerable, and digital exclusion. However, much more needs to be done to address the new, emerging problems of the internet age, including online crime, terrorism, fake news and malicious behaviour. Jamaica's legislation in this area was now largely out of date. One reform which would help is for Parliament to update the enabling legislation for the Broadcasting Commission, and make it fit for the new age.

Digital literacy is already the cornerstone of the Commission's public education initiatives. These initiatives include a schools' outreach programme, and advertisements such as the award winning 'Pinchy Dead' which warns about fake news. Other interventions online are designed to

encourage ethical and responsible sharing of information, for example, warning about why it is important to avoid circulating pictures of dead bodies and horrific accident scenes on social media.

The Broadcasting Commission believes, however, that content regulation should be limited to only what is both essential and feasible, and must always have regard to the right to freedom of expression and access to information. The digital age requires a much more sophisticated approach than the traditional directives and sanctions employed by regulators in the past. Today, content regulation has to include digital literacy, because citizens must be able to recognize when there has been an infringement or misuse of their personal information; they must be able to detect media manipulation via disinformation and botnet operations; able to detect penetration of social media by terrorist or criminal networks; able to guard themselves against malicious, harmful and inappropriate content; and ready to use the empowering and liberating potential of technological innovation to create and share information for knowledge building, learning, development and economic activity.

If we can achieve these goals, then Jamaica will truly lead the small nations of the world in the transition to a digital economy and society.

ix. The way forward for Jamaica

1. We need a fundamental rethink of the legislative framework for media and content regulation, and include the necessary mandates for the Broadcasting Commission to undertake the tasks now required, including the promotion of digital literacy in Jamaica.
2. The Broadcasting Commission should regulate content in a dedicated, specialised and technology-agnostic manner, across platforms and devices, encompassing broadcasting, cinemas, video games, social media, virtual reality, augmented reality and AI applications.
3. We need to expand the media literacy and digital awareness programs, working through schools and educational organizations, to engage students and adults (especially parents) on the critical media and information issues of the day such as cyber-bullying, revenge porn, internet addiction, and other problematic internet use issues. We need to build the capacity of youth, parents/guardians and teachers to detect and report risks; and sensitize people to signs of radicalization or gang recruitment.
4. In the longer term, infrastructural convergence will move beyond telecommunications, broadcasting and spectrum to include the electrical grid, the smart road network and autonomous transport systems, industrial symbiosis and smart cities, as platforms and networks converge. The institutional arrangements to deal with technological convergence must therefore be carefully considered; new institutional structures will be required.
5. We must deepen our engagement with regional and international counterparts, as some jurisdictional issues (such as regulating technology companies) will require a regional or global approach.

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6. We must consider taxing e.g. foreign-based technology companies with a strong presence in the Jamaican market, and use part of the proceeds to fund digital literacy and build regulatory capacity.
7. We must develop algorithms to monitor content online and assess the efficacy of the tools used by online operators to protect against various harms.
8. We must support the media companies in developing their capacity for fact-checking and detecting disinformation and political manipulation.
9. We need to update the provisions for political advertising to make them fit for the age of social media.

x. The BCJ's new mission

This article explains why the Broadcasting Commission of Jamaica now has a new mission. Its mission is “To ensure a successful national transition to a digital economy, using the empowering and liberating potential of technological innovation to encourage new forms of business, social, cultural and media development while protecting the people of Jamaica from potential abuses of communication and influence. We guard against malicious, harmful and inappropriate content; we operate public education programs to build the capacity of youth, parents, guardians, teachers and the general public to detect and respond to harmful material; and we work with the media to encourage high standards and trustworthiness in journalism”.