Assessing Media Platformization in Small Nations: A Rights-Based Approach



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ABSTRACT

The rise of the internet and the subsequent global reach of digital platforms has provided entirely new participatory opportunities for citizens and created new types of content and services in both national and global media land-scapes. At the same time, we have witnessed serious new challenges to individuals, organizations, and society, including political polarization, rampant and viral mis- and disinformation, diminishing trust in knowledge institutions, and the like. In this article, we introduce a citizen-centric model of four communication rights as a normative-evaluative framework for assessing the impact of this so-called platformization as it pertains to small nations, with the case of Finland as an empirical illustration.

KEYWORDS: platformization, communication rights, Finland.

^{*} This article is based on a policy brief (Sirkkunen *et al.*, 2021) for the conference Media Platformization and Small Nations, October 28–29, 2021, University of Helsinki. https://www2. helsinki.fi/en/conferences/media-platformisation-and-small-nations.



INTRODUCTION

Smaller nations have consistently faced the mantra that they lack the capacity, the skill, or the popular support to rein in the power of global digital platforms.

— Terry Flew (2021, p3).

The rise of the internet and the subsequent global reach of digital platforms has provided entirely new participatory opportunities for citizens and created new types of content and services in both national and global media land-scapes. Indeed, the ubiquity of platforms in our lives has prompted the term *platformization*, describing the penetration of infrastructures, economic processes, and governmental frameworks of digital platforms in different economic sectors and spheres of life, as well as the reorganization of cultural practices and imaginations around these platforms (e.g., Poell et al., 2019).

However, with the rise of platformization, related challenges have become apparent. In terms of national media markets, monopolies of online platforms—specifically, the rise of online advertising—have disrupted the business model of journalism. In terms of political impact, global platforms have enabled the viral spread of misinformation due to their algorithmic recommendations and the business model related to algorithms. The impact on national cultural spheres can be seen in diminishing content diversity, not only with the crowding out of local and national news providers, but also, for instance, with personalized bubbles of content filtered by algorithms.

At the same time, the technology giants, such as Google, Apple, Meta, Amazon, and Microsoft, lobby vigorously for self-regulation and against any accountability in compensating legacy news organizations for news content or curbing hate speech. Currently, there are few legal solutions for these challenges, especially on a national scale. While, for instance, the European Union is working on legislation that would curb very large online platforms (VLOPs) especially and secure the role of national media in the era of platformization (e.g., European Commission, 2022a), national media systems differ drastically even in that region. Is thinking about national policy responses for platformization a mission impossible?

Not necessarily. As Flew (2021) argued, small and medium-sized nations can rethink and replace the pervasive, normative ethos of the open internet as a guiding policy principle. And as, for instance, Zuboff (2019) noted, one way to reconceptualize the position of mere users of platforms and services is to take a rights-based approach that focuses on citizens as rights-holders in the current hybrid media landscape (e.g., Chadwick, 2017). Rights-based

principles could offer a benchmark against which to assess specific, context-bound challenges of platformization.

However, contextual understanding requires empirical examination. Considering the ubiquity of digital platforms in our everyday lives, there is surprisingly little research specifically focused on their influence on the public life of small and medium-sized nations. In this article, we present a rights-based approach to uncovering and analyzing the power of the platforms in a specific context.

Our proposed framework for assessment has three dimensions: normative-foundational, empirical, and normative-evaluative:

- The normative-foundational dimension defines and focuses on four communication rights of citizens: access, availability, privacy, and dialogicality. This approach was originally developed in an analysis of citizens' communication rights in Finland and documented in Ala-Fossi et al. (2019; Nieminen, 2010, 2016, 2019; Horowitz & Nieminen, 2016). This dimension is based on international human rights declarations and treaties and is in alignment with the United National Universal Declaration of Human Rights.
- The *empirical dimension* proposes an operationalization of the aforementioned rights in terms of how they are realized by different societal spheres or stakeholders. How are they supported or suppressed in the political context by policy and regulatory measures, by the public sector, by the media, and by civil societies' activities, as well as by citizen-consumer-users? To examine how *platformization* impacts citizens' rights, the empirical analysis documents how platforms shape the activities and decisions of the different stakeholders.
- Finally, the *evaluative* dimension pertains to the normative examination of the above: What is the impact of platformization when the four communication rights of citizens are at stake and not, say, the freedom of the web or digital innovation economy? Only when we have assessed the impact of platformization can we envision concrete, context-specific measures that, while they may not change the logic of the global platform economy, can help support and safeguard citizens' competencies in a specific society.

In this article, we first introduce the model of four communication rights as a normative-evaluative framework. Second, we describe the framework for the empirical dimension by looking at the case of Finland with some specific illustrations of the political context, policy context, market context, and new

context of media accountability and governance, as well as the context of individual citizens. Although far from exhaustive, these examples still portray the ways in which the impacts of platformization can be described and analyzed. Finally, we conclude with an overall assessment of the evaluative dimension and the relevance of this framework for any small- or medium-sized nation.

FOUNDATIONAL DIMENSION: COMMUNICATION RIGHTS AS A FRAMEWORK

Today, numerous policy and public debates surround the role of global platforms in realizing or violating principles such as freedom of expression or privacy. Rights related to communication are not entirely new to the platform era. These topics, ranging from countering Westernization to linking communication to other human rights, have been discussed since the 1970s (Hamelink, 1994; Jørgensen, 2013; McIver et al., 2003; Mansell & Nordenstreng, 2007). Platformization has both democratized and challenged citizens' rights to communicate in new, powerful ways. Even today, many of the discussions refer to basic rights that are stipulated in the United Nations Universal Declaration of Human Rights (e.g., MacKinnon, 2013; Zuboff, 2019) as well as in regional rights declarations and national constitutions.

However, in the past decade, digitalization has come to be seen from a rights-based perspective. Various nongovernmental groups have made efforts to monitor rights and influence the global policy landscape (e.g., MacKinnon et al., 2016). Increasingly, the United Nations is articulating the need for shared principles regarding human rights in digital spaces (UN, n.d.). In addition, the European Commission proposed a Declaration of Digital Rights and Principles in January 2022 (2022b).

Still, nation-states are powerful actors whose choices can make a difference in the realization of rights (Flew et al., 2016). This is made evident through monitoring efforts that track press freedom and internet freedom and the increased efforts by national governments to control citizens' data and internet access (e.g., Freedom House, 2020; Reporters without Borders, 2021) and also recognized by the United Nations in several documents (e.g., UN, n.d.).

To assess the impact of platformization on communication rights, we employ in this article a basic framework that divides the notion of communication rights into four distinct operational categories (Ala-Fossi et al., 2019; Nieminen, 2010, 2016, 2019; Horowitz & Nieminen, 2016). Here, communication rights are seen not only as legally binding rights but also as societal norms that stipulate citizens' rights to communication. These divisions differ from other recent categorizations (Couldry et al., 2016; Goggin et al., 2017) in that they specifically reflect the ideals of an informed citizenry and shared

knowledge and culture via *communication* and do not include questions about platformization and work, for instance. The core rights in this framework are the following:

- Access: citizens' equal access to information, orientation, entertainment, and other content serving their rights.
- *Availability*: equal availability of various types of content (information, orientation, entertainment, or other) for citizens.
- Privacy: protection of every citizen's private life from unwanted publicity, unless such exposure is clearly in the public interest or the person decides to expose it to the public, as well as protection of personal data (processing, by authorities or businesses alike, must have legal grounds and abide by principles such as data minimization and purpose limitation, while individuals' rights must be safeguarded).
- Dialogicality: the existence of public spaces that allow citizens to publicly share information, experiences, views, and opinions on common matters.

In the following, we operationalize these rights with the case of Finland. The empirical material is derived from a recent policy brief assessing the impact of platformization in this small Northern European country (Sirkkunen et al., 2021). We discuss different dimensions of how these rights are affected by platformization in national communications policy, politics, national media markets, and citizens' activities.

For each dimension, we highlight one specific example that arose from the policy brief as significant for the Finnish case. The examples here focus on the challenges – rather than the opportunities – of platformization, and while they each offer only narrow outlooks on different national issues, they simultaneously underscore the diversity of problems that platformization may bring about. For the policy context, the focus is on *industrial policy* and *public broadcasting*; for politics, *populism*; for markets, *journalism*; for individual citizens' activities, *trust in media*; and for governance and accountability, *fact-checking*.

EMPIRICAL DIMENSION: ILLUSTRATING ASSESSMENT

Finland is a small country with a relatively small population and a restricted market, isolated both geographically and linguistically from the larger European countries. This makes Finland less interesting to the big global media companies: the costs of entering the Finnish market are rather high compared to the financial gains that can realistically be expected. This position might be

assessed from both positive and negative points of view: on the one hand, there are fewer challenges to the Finnish media industry and cultural identity than in many other small European countries; on the other, the political and economic weight of Finland may be less than some other European countries of the same size. This may also result in less attention and service to Finnish national stakeholders from global platforms.

However, Finland, together with other Nordic countries, has been called the "Nordic Media Welfare State" (Syvertsen et al., 2014), the moniker depicting countries characterized by universal media and communications services, strong and institutionalized editorial freedom, a cultural policy for the media, and policy solutions that are consensual and durable, based on consultation with both public and private stakeholders. In international comparisons, Finland remains one of the top countries in press freedom rankings year after year (Reporters without Borders, 2021) as well as in media and information literacy rankings (Lessenski, 2021).

In a sense, Finland seems like a perfect test case for the impact of platformization: With such a strong national traditional ethos of the media welfare state and a small market with a distinct language, how significant could the impact of platformization be on communication rights in that country? Based on our analysis (also, Sirkkunen et al., 2021), the impacts are quite significant for a variety of reasons, as the following description of different contexts illustrates.

POLICY CONTEXT

Although Finnish communication policy solutions are now intertwined with broader European Union initiatives, the country has an idiosyncratic historical legacy in communication policy. In the 1990s, Finland was a frontrunner in shaping information society policies, gaining notice for technological development and global competitiveness, especially in the mobile communications sector (Castells & Himanen, 2002). Finland was also among the first nations to make affordable broadband access a legal right (e.g., Nieminen, 2013).

Even so, while Finland has invested in building the so-called digital welfare state (e.g., Jørgensen, 2021), with vast e-government and e-citizenship activities, the country does not yet have a specific media and communication policy approach to the digital platform companies. The entire issue has been treated mainly as part of the national industrial policy of attracting more international investors. In other words, national policy answers to the challenge of digital platforms have been reactive, concentrating primarily on the regulation of telecommunications and the construction of digital infrastructure.

Platformization has challenged the business model of commercial media (see the section "Market Context"), and recently, to support the media industry

in the digitalizing business environment, the government has set media policy goals. In the spring of 2021, a working group, appointed by the Ministry of Transport and Communications proposed a permanent public aid policy for media that provide news and current affairs content (Wirén et al., 2021). However, the proposal was not included in the government's proposal for the next budget year.

Since it cannot challenge the global actors, the domestic commercial legacy media industry seeks to diminish the activities of its public competitor. This manifests in ongoing attacks by commercial media companies against the Finnish public broadcaster Yleisradio (Yle). In some way, this is understandable: after Yle was turned from a license-fee-funded service into a tax-financed service, it shifted resources from broadcasting to online, creating world-class online audio-visual news and media services free of charge and providing a popular domestic alternative to global actors.

The Finnish Media Federation (Finnmedia) filed a complaint with the European Commission against Yle's online services in 2017. According to Finnmedia, Yle's online services breach the EU's competition law and transgress the remit of public service broadcasting as stipulated in the EC's communication of 2009 (Finnmedia, 2017). To avoid a conflict with the European Commission, the Finnish government proposed amending the Act on Yle in a way that would satisfy the Commission and partly accommodate Finnmedia's claims (MINTC, 2020). At the time of writing (February 2022), the issue is still under discussion by the Finnish Parliament. However, there is wide public opposition to any attempts to restrict Yle's online mandate in the government's amendment intention.

Even the government's compromise has not been enough for the media industry. In May 2021, Sanoma Company, a major Finnish media house, filed a new complaint against Yle's online presence on the same premises as the previous Finnmedia case. The Ministry was quick to respond to Sanoma's complaint, stating that the complaint had no merit and that Yle's actions were basically in accordance with the present legislation (Vanttinen, 2021).

POLITICAL CONTEXT

In many, if not most, countries, political communication takes place increasingly online, and often on social media. A look at candidates with an online campaign presence in Finnish parliamentary election campaigns between 2007 and 2019 (Strandberg & Carlson, 2021) reveals that while the use of websites and blogs has not increased significantly in over a decade, Twitter and especially Instagram have gained prominence, and the position of Facebook is also significant.

Online platforms have special significance in populist discourses in Finland, where political populism is commonly linked to the Finns Party (Perussuomalaiset, PS). In general, blog forums have been essential for creating the Finnish anti-immigration community, but during the 2010s, other social media platforms—YouTube, Facebook, and Twitter in particular—have also been extensively used by radical and extreme-right actors. Humor and particularly memes has been employed in social media anti-immigration rhetoric. Online media platforms in their various forms have been part of the populist toolkit

As an official party, PS learned to use social media platforms strategically during the 2010s, following the general increase in the use of social media in campaigning. Scandals linked to PS members caused by their insulting provocations and norm transgressions have arisen in Finland. Twitter has often played an important role in originating and dramatizing the scandals, but Facebook and discussion forums, in particular, serve as platforms for continuing the scandal with opposing views, including those supporting scandal-plagued populist politicians. And when mainstream platforms increase their moderation activities, right-wing populists and different fringe groups move to Telegram and to a newly established Finnish streaming and networking service called Tokentube.

Consequently, even though the most extreme actors in Finland use Twitter to gain public attention, they prefer their own discussion forums and Facebook groups. This has led to so-called "double-speak," meaning that more constructive comments are given in mainstream media to attract larger voter groups, while more extreme statements are made in their own forums to appeal to their radical supporters.

Despite the increasing provocations, hate speech, target acquisition, trolling, system hacking, and use of bots, no systematic "third-party" interventions in Finnish election campaigns on social media platforms have been discovered. In fact, election research found the influence of social media to be rather marginal in elections in the 2000s, and it was not until the late 2010s that the influence of social media on election results increased, particularly among younger voter groups.

However, the (algorithmic) logic of social media platforms tends to establish the extremes of Finnish political communication—not only the radical right but also its "anti-populist" opponents of the extreme left, green, and/or feminist groups (Hatakka, 2019). This has become specifically visible in harassing of female journalists, including the invasion of their privacy, and has led to several related court cases (e.g., Vehkoo, 2021). All in all, the growth of right-wing populist politics, coupled with the rise of online hate speech

against public officials (Knuutila et al., 2019) and the targeting of journalists (e.g., Hiltunen, 2021), poses a problem partly enabled by social media platforms. All these developments have led to heated public debates on what freedom of expression means in Finland in the era of platforms.

MARKET CONTEXT

Platformization has become an integral part of the development of the media market in many countries, including Finland. It has affected the structure of the media industry and audience share, as well as the composition of the advertising market. Despite digitalization and platformization, most newspapers are still dependent on print revenues. Statistics Finland (OSF, 2021) has quantified the changes: Between 2010 and 2019, the total volume of the mass media market in Finland moved in waves, alternatingly declining and rising. In 2016, the media market showed slight growth again, and in 2019, it was approximately 3.9 billion euros. Despite growth over the last couple of years, the total volume was, even before the COVID-19 pandemic, slightly lower than at the beginning of the decade. However, there are significant differences in the development of the various subgroups of the media. Electronic media platforms have grown significantly, while the volume of print publishing has fallen steadily.

The total number of companies in the mass media industries increased during the 2010s by approximately 11% by 2019. However, this development pertains particularly in audio-visual program production and web portals. In contrast, in the publishing industry, the number of companies fell by 11%. For example, the number of newspaper titles fell during the 2010s from 247 to 208 titles in 2019. The number of daily newspaper titles declined by almost one-third. Abolitions and mergers with other newspaper titles and the reduction of weekly issues can explain this development (OSF, 2021).

Because of digital transformation, the operational environment for the news media has become more competitive. There are many kinds of news producers on the internet, and the news circulates rapidly. The global *Digital News Report* (Newman et al., 2021) and its country report on Finland (Reunanen, 2021) document that the traditional Finnish news media has retained its advantageous audience position even in the online environment. The online news sites of traditional television and newspaper companies have an 81% weekly reach, which is greater than those in any other country in the survey. At the same time, the reach of social media as a news source is 45%, which is clearly less than in most of the other countries. On the other hand, the reach of digital-born news sites is low in Finland. One reason might be that the most popular international digital-born publications do not have editions in Finnish and that traditional national news companies introduced their online offerings early enough.

The new online environment has compromised the news media's position as a privileged gatekeeper and attention broker. Social media, the blogosphere, and professional corporate communications, that are more or less journalism-like in nature, have turned journalism into just one of the possible sources of timely information. There are signals as well that people no longer recognize earlier journalism's role as a gatekeeper who distinguishes true from false and acceptable from unacceptable.

CITIZEN-USERS' CONTEXT

In general, almost every Finn is connected to the internet, and they are also active online. In 2020, some 92% of Finns had used the internet within the past three months, and over 90% of 16–54-year-olds use it many times a day. Media consumption via the internet is quite common and has been on the rise. Similarly, social media is an integral part of the everyday life of Finns. Unsurprisingly, the pandemic has increased its use, especially for internet calls. In addition, more older people took up social media use. Even so, age remains significant with regard to the frequency of use of online platforms and services. WhatsApp and Facebook are the most popular social media applications, used daily by well over 50% of Finns, although Facebook is steadily losing users, particularly among the young. While 16–24-year-olds are the most frequent daily users of many forms of social media, they prefer YouTube and Instagram, and Snapchat and TikTok in particular are platforms clearly dominated by this age group (OSF, 2020).

Concerns about diminishing societal trust and the polarizing effects of media use have typically been associated with online environments, particularly social media. Social media platforms have often been criticized for confining users to networks of like-minded people who filter out news and information that does not correspond with their pre-existing views. While these claims have been contested by studies indicating that most users are, in fact, exposed to a relatively wide range of information sources during their online networking and news consumption (e.g., Dubois & Blank, 2017), the critical notion of (media-induced) "bubbles" has become part of the public debate, including in Finland.

Even though Finns trust social media significantly less than EU citizens on average (European Broadcasting Union, 2020), a survey study on trust in the legacy and social media in Finland (Horowitz et al., 2021) revealed somewhat contradictory tendencies. No less than 21% of the Finnish respondents agreed with the claim that "I feel like I am living in a social media bubble," and an even larger share, 31%, agreed that "Social media services excessively guide how I get information." While media-induced bubbles were by no means a

marginal concern among the respondents, this issue paled in comparison to fake news and disinformation. Being "worried about fake news" was a personal sentiment recognized by 76% of the respondents, and 87% agreed that "information operations can be used to manipulate people's opinions."

In addition, almost no respondents considered social media services, such as YouTube (6%), Twitter (4%), Facebook (3%), and Instagram (2%), to be reliable as news sources, and Facebook was clearly viewed as the most unreliable platform. Various chat forums did not fare any better: only 3% of respondents found them to be reliable news sources. With little trust in the assessments and recommendations of their friends and peers, most online users appear to see themselves as largely on their own when trying to assess the reliability of the information.

Finland has excelled in early information society policies and created, among many, a particularly successful e-participation initiative, based on a 2012 amendment to the constitution, that has made it possible for citizens to submit initiatives to Parliament. Even so, global social media platforms in Finland are mainly used for socializing, as well as, for younger people, consumption and information about brands. They are not widely used by any age group for political participation in civil society activities. Additionally, online spaces, including social media, can be adversarial and hostile communication arenas. Some two-thirds of young people, almost as many young adults, and almost half of all 35–44-year-olds in Finland have encountered hateful speech about certain groups on social media. One-third of 16–24-year-olds and one-fourth of 25–34-year-olds have been subject to inappropriate behavior online (OSF, 2020).

GOVERNANCE AND ACCOUNTABILITY CONTEXT

Research shows that year after year, Finnish people's trust in news media remains at a high level, but there are still some worrying signals. Trust in the accountability of Finnish journalism grew weaker between 2007 and 2020. Audiences are less convinced that fact is clearly separated from opinions and fiction. The importance of transparency as the building material of trust has been brought up by both audience members and media professionals (Horowitz et al., 2021.)

One remedy for the rise of disinformation and the decline in trust in the news is what has become known as fact-checking. Fact-checking can be viewed as a journalistic process or genre, and for this reason, established news organizations incorporate fact-checking in their efforts, including the largest newspaper, *Helsingin Sanomat*, regional newspapers, and online news media, as well as the public broadcaster Yle. However, platformization has prompted

the rise of independent fact-checkers, in Europe and all around the world, that tackle false information and conspiracy theories online (e.g., Graves & Cherubini, 2016). In Finland, the rise of challenges related to global platform power has given rise to new types of civil society actors, for example, organizations concerned with access to public information and personal data, but also an independent fact-checker that seeks to tackle online disinformation and enhance digital information literacy of adults and children.

Founded in 2014, the fact-checker Faktabaari (Fact Bar) has mostly conducted fact-checking during election debates, but it has also been active in education efforts under a separate Faktabaari EDU project. However, both legacy media and Faktabaari have received criticism (e.g., Nieminen & Wiberg, 2018) for their fact-checking practices, which do not always fully adhere to the international code of principles set by the International Fact-Checking Network. In addition, the capacity of this grant-funded not-for-profit is to provide only a handful of checks at any given time.

EVALUATIVE DIMENSION: CITIZEN-CENTRIC VIEW

At first glance, Finland seems well equipped to counter platform power. After all, it features a small, linguistically distinct media market in a country with a long history of free media, distinct and progressive digitalization, and media literacy policies and activities, as well as the overall traditional ethos of the "media welfare state" (Syvertsen et al. 2014). However, a closer look at the impact of platformization on citizens' communication rights reveals a complex picture:

In terms of *access*, the early information society policies and the decision to make broadband internet connection part of the universal service obligation have secured the ability of Finns to enjoy content and services online everywhere in the country. However, access to content for sensory-impaired audiences is being threatened by the proposal to limit the public broadcaster's text-based online content as a distortion for new markets. This is because many rely on Yle's text-based news for programs that translate textual content for aid devices. The proposal for limitations by the commercial competitors is a direct result of the increasingly dire market situation that global platforms, not Yle, have caused.

In terms of availability, there is contradictory evidence regarding the impact of platformization on diversity and pluralism. Certainly, more content and services are available than ever before. However, in terms of the national media system, the concentration of news markets and the above case of Yle highlight the opposite effect. In its present form, and together with media concentration, platformization has meant the withering of local and regional

media. Simultaneously, its algorithmic recommendation system has seemingly amplified the effects of social polarization and political and ideological divisions that have resulted in the fragmentation of audiences. Challenges to the availability of content could also be seen in the "double-speak" typical for populist politics that feature various kinds of comments in mainstream media from specific, closed online forums. Furthermore, the establishment of the independent fact-checker as a civil society organization highlights the concern that the online sphere, while rich in availability, offers much harmful and even dangerous content that other Finnish stakeholders are not addressing.

In terms of *privacy*, the right to privacy is a fundamental constitutional right and includes the right to be left alone, the protection of a person's honor and dignity, the physical integrity of a person, the confidentiality of communications, the protection of personal data, and the right to be secure in one's home (Neuvonen, 2014). Nevertheless, with the data-driven business model of global platforms, the efforts of nation-states and even regions to protect users are weak (e.g., Maréchal & Biddle, 2020). The targeting of journalists and other public figures has revealed how fragile the legal structures are in the case of online harassment. Even more alarmingly, the amount of untoward behavior, including hateful speech and harassment, that Finns have witnessed online seems dangerously high.

Dialogicality seems to pose the biggest challenge caused by platformization. Global platforms have obviously extended the democratic potential for traditional forms of civic participation and associational activities and have created innovative ways to engage in political and cultural life all over the world, including in Finland. At the same time, platforms are used for anti-democratic and criminal activities. It is one thing to state that the internet and platform services have greatly improved our access to official documents; it is quite another to claim that this has increased our knowledge and understanding of the reasons for and implications of public policies and policymaking. As the sovereignty of nation-states is gradually eroding, because of both economic and political integration and enhanced security issues, most decisions are progressively withdrawn from the realm of national public discussions. Obviously, this is not only because of the influence of the digital media platforms, but they could be part of the solution if it were so decided.

A significant issue in dialogicality is diminishing trust in news media. While Finns' trust in legacy media is still high compared to that in many other countries (Newman et al., 2021), the impact of platformization seems to be increasing scepticism of other people's literacy skills (Horowitz et al., 2021), as well as ever-growing distrust in social media. And yet, social media is a significant source of news to Finnish audiences.

In addition to the logic of the digital attention economy that is geared toward collecting data, social media platforms have created a treacherous communication environment—one that can be widely manipulated by only a few actors. While active online, Finnish audience-users are quite aware of the limited possibilities as well as harms that social media and other platforms pose to them. The experiences of social media bubbles, of harassment and hateful speech, and of possible disinformation all create more skepticism and distrust, not only toward platforms but also toward other users, and thus diminish audience rights as informed citizens who can, and would like to, engage in public discussions and decision-making regarding common issues.

CONCLUSION: BEYOND FINLAND

It might seem that the rights-based framework for assessing the impact of platformization is specific to countries like Finland that carry the tradition of "media welfare states." To be sure, the promotion of communication rights based on the ideal of epistemic commons is institutionalized in a variety of ways in Finnish communication policymaking, ranging from traditional public service media arrangements to more recent broadband and open data initiatives. Furthermore, the recent Eurobarometer on digital rights and principles (EU, 2021) revealed that Finns are among the most optimistic in the European Union about their digital future. Their biggest concerns surround cybercrime, as well as questions of inequality that digitalization may bring about. This speaks further to the ongoing ethos of the media welfare states in the digital era.

At the same time, the ideal of the media welfare state has prompted criticism, both in international and Nordic contexts, as systems of social protection, driven by data and technologies that not only automate, predict, but also surveil and target citizens (e.g., Jørgensen 2021). Similarly, the very existence of the contemporary Nordic media welfare state has been called into question and described as an ideal that no longer exists, due to recent developments in media markets and policies, including the increased power of global platforms (Ala-Fossi, 2020). In this context, the illustration of the rights-based approach described here by the case of Finland highlights how platformization hampers citizens' communication rights, even in a national context that, at first glance, may seem well equipped to resist the negative impacts of platformization.

Furthermore, we argue that the rights-based model may be applied to diverse contexts. Its strength lies in its foundations in core human rights principles as applied to communication and its focus on the users of platforms as citizens. Hence, it allows for the examination of subtle and local manifestations

of global and market-driven trends—and based on these analyses, related national policy measures can be considered. In addition, recent academic efforts aimed at comparative outlooks on communication rights (Couldry et al., 2016; Goggin et al., 2017) are indications that communication rights urgently call for a variety of conceptualizations and operationalizations to uncover similarities and differences between countries and regions. We need global policy efforts, but we also need to understand their specific national and supranational reiterations to comprehensively address platformization and its impact on citizens' communication rights. As Flew (2021) notes, the global-local scales that large technology companies employ can be applied equally in policy and regulation.

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