

# The Political Economy of the Media in Turkey: A Sectoral Analysis

Ceren Sözeri  
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TESEV  
DEMOCRATIZATION  
PROGRAM

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TESEV

**Türkiye Ekonomik ve Sosyal Etüdler Vakfı**  
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## Abbreviations

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<b>BİK</b>	: Directorate General of Press Advertisement (Basın İlan Kurumu)	<b>İSMMMO</b>	: Istanbul Chamber of Certified Public Accountants (İstanbul Serbest Muhasebeci Mali Müşavirler Odası)
<b>BYGEM</b>	: Directorate General of Press and Information (Basın Yayın Enformasyon Genel Müdürlüğü)	<b>MEPAŞ</b>	: Çukurova Group Media Marketing Company (Çukurova Grubu Medya Pazarlama Şirketi)
<b>BİAK</b>	: Audience Research Committee (Basın İzleyici Araştırmaları Kurulu)	<b>MÜYAP</b>	: Turkish Phonographic Industry Society (Bağlantılı Hak Sahibi Fonogram Yapımcıları Meslek Birliği)
<b>CHA</b>	: Cihan News Agency (Cihan Haber Ajansı)	<b>MDG</b>	: Mutlu Magazine Group (Mutlu Dergi Grubu)
<b>CR %</b>	: Concentration Ratio	<b>OECD</b>	: Organisation for Economic Co-operation and Development
<b>CSA</b>	: Superior Audiovisual Council (Conseil supérieur de l'audiovisuel)	<b>OFCOM</b>	: UK Office of Communications
<b>DB</b>	: Doğan Burda	<b>RTÜK</b>	: Radio and Television Supreme Council (Radyo ve Televizyon Üst Kurulu)
<b>DHA</b>	: Doğan News Agency (Doğan Haber Ajansı)	<b>RATEM</b>	: Radio and Television Broadcasters Professional Union (Radyo ve Televizyon Yayıncıları Meslek Birliği)
<b>DMC</b>	: Doğan Music Company	<b>RPP</b>	: Republican People's Party (Cumhuriyet Halk Partisi)
<b>DPP</b>	: Magazine Planning and Marketing (Dergi Planlama Pazarlama)	<b>RVD</b>	: Advertisers' Association of Turkey (Reklamverenler Derneği)
<b>FCC</b>	: Federal Communications Commission	<b>SCP Paradigm</b>	: Structure-Conduct-Performance Paradigm
<b>GDP</b>	: Gross Domestic Product	<b>SGK</b>	: Social Security Institution (Sosyal Güvenlik Kurumu)
<b>HHI</b>	: Herfindahl Hirschman Index		
<b>IAB</b>	: Interactive Advertising Bureau		
<b>IMD</b>	: Internet Media Association (İnternet Medyası Derneği)		
<b>INTERACT</b>	: Interactive Agencies Association (İnteraktif Ajanslar Derneği)		

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<b>TGNA</b>	: Turkish Grand National Assembly	<b>TRT</b>	: Turkish Radio Television Corporation (Türkiye Radyo Televizyon Kurumu)
<b>TGS</b>	: Turkish Journalists Union (Türkiye Gazeteciler Sendikası)	<b>TurkStat</b>	: Turkish Statistical Institute (Türkiye İstatistik Kurumu)
<b>TMSF</b>	: Savings Deposit Insurance Fund (Tasarruf Mevduatı ve Sigorta Fonu)	<b>TVYD</b>	: Television Broadcasters' Association (Televizyon Yayıncıları Derneği)
<b>TİB</b>	: Telecommunication Communication Presidency (Telekomünikasyon İletişim Başkanlığı)	<b>ZEDPAŞ</b>	: Çukurova Group Advertisement Marketing Company (Çukurova Grubu Reklam Pazarlama Şirketi)
<b>TİAK</b>	: Television Audience Research Committee (Televizyon İzleme ve Araştırma Kurulu)		

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# TESEV's Presentation

**Ebru İlhan**, *TESEV Democratization Program*

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TESEV's Democratization Program has been working for nearly ten years on institutional and social perceptions and underlying mentalities. In particular, the Democratization Programme has dealt with the Kurdish Question, the religion-state-society relationship, security sector reform or the civilian-military relationship, minority rights, democratic citizenship and the judiciary which it identifies as the main problems in Turkey's democratization process and the reform measures that are expected to result in full membership in the European Union (EU). Past studies conducted by the Democratization Program have focused on how the media has reported on the aforementioned areas, in short, on media discourse. TESEV has made suggestions to help ensure that the media discourse is respectful of human rights and freedoms, more sensitive, especially towards vulnerable individuals, and operates in an environment that does not advocate or encourage hate, which is as independent and objective as it possibly can be and which adheres to universal and corporate ethical principles. In our recent projects, in the areas of Security and the Kurdish Question, we came together with media professionals such as correspondents, journalists, columnists and editors and discussed whether it was possible to pursue a publishing policy based on democratic citizenship rather than on approaches that simply follow status quo state policies in these two areas. In all TESEV's past studies, we have played the part of civil society

actor that treats the media as one of its consumers and that endeavours to criticize, improve and democratize it from the outside. This civilian reflex has shaped our perception of the media; essentially, we have accepted the media as a political actor.

Believing that understanding the relationship between an independent and free media and democracy will play a major guiding role in Turkey's democratization process, TESEV initiated a new project area in 2010. In this new project, which we call, in brief, "Media and Democratization," we undertook the Turkish leg of the research project MEDIADEM, which is supported by the 7th Framework Programme of the European Union, makes a comparative evaluation of the media policies, media regulations and the media-state-citizen relationship in 14 European countries. In our first study published under this aegis as part of the MEDIADEM Project, Dilek Kurban and Esra Elmas showed the evolution of media in Turkey with its state-centred character that fed the official ideology throughout the Republican period to date, and the legislation and policies that regulate the media domain. In the "The Political Economy of the Media in Turkey: A Sectoral Analysis" report we present what we hope is a holistic and broad-based perspective on the media, with full awareness of its social and political weight.

As in most parts of the world, the media in Turkey is also composed of commercial enterprises; as such it is a serious economic

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actor. The present report is the second that TESEV has published in the area of media and democratization and it examines the media, foremost, as an economic area. Media ownership, state-capital relationships in the media sector, the effects of the sector's working conditions and labour economy on the sector itself, and the present and future of competition and investment possibilities are addressed herein, with Ceren Sözeri and Zeynep Güney drawing a map of the media sector in Turkey.

Singling out the media sector for analysis implies a challenge. We know that professional organizations, trade unions and others criticize the unfair working conditions in the media. We are also aware that these criticisms alone are insufficient to improve labour conditions in the media; media professionals are facing serious problems in organizing and defending their rights. However, we are also aware that resisting the acceptance and study of the media as a sector may attribute a political identity to the media. When preparing this report, we assumed that the media is not in all circumstances just a political actor. We began by taking into account that current or future investors entering the media sector in Turkey may very well be acting on commercial considerations.

Naturally, as the TESEV Democratization Program, we have studied capital relationships in the media not solely for the sake of providing an economic analysis. We believe that the findings of other studies on media ownership in Turkey are sometimes of questionable, rather than being information-based and objective, they aim at exposing the activities of persons or segments of the society that have political or social power. We believe that this 'tradition' must be crushed. One of the main responsibilities of civil society is to study the economics of the media by adhering to scientific criteria and

ensuring an understanding of the competition and investment relationships in the sector. As such, to put it in the words of Erol Katırcıoğlu, who undertook the academic arbitration of this report, "The fact that the media sector is more important than other sectors for civil society is due to the powerful effect the media has on the political and cultural world, which we can call the superstructure of society."

However, we have encountered many challenges in our efforts to map out the media sector in the Turkey of 2010. We found it impossible to gain access to the data on advertising revenues and their distribution between players in the sector. Both of these constituted the main data we were planning on using to measure the size and profitability of the sector, through an institution that has adopted the principle of transparency and that has the obligation to serve the public, such as the Radio Television Supreme Council (RTÜK). That these types of information are considered "trade secrets" and are hence not shared makes it impossible to make information-based analyses on the structure of media ownership and the grey areas of investor relationships. We believe that, with the help of the provision in the RTÜK Law that will put a cap of 30% on advertising revenues, the obstacles to accessing these data will be eliminated. Yet, the fact that many of the data, from holders of press cards to the unionization rates in media organizations, are recorded haphazardly or not disclosed to researchers reinforces the difficulty for a non-governmental organization to monitor and analyze the media sector in Turkey. We hope that this report will enrich the monitoring and follow-up studies of TESEV and Turkish civil society on the media, and that the economic analysis of the sector becomes as important as discourse and content analysis in the media.

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To conclude, TESEV set off on this road with the purpose of improving media regulation and policies and contributing to building a free, independent and democratic media, through its research and advocacy. We believe that an important way to make the media a free, independent and citizen-oriented domain is to create a sector based on the principles of pluralism where sound competition practices are maintained. As emphasized in the report, democratization in the media will only be possible with a sector open to national and international investments, that is transparent

and auditable and in which free-market conditions will not be hampered. Along with the structure of the market, it is also necessary to effect a positive change in working conditions. The suggestions in the report call out not only to the players in the sector, but also to legislative and executive organs that create and execute the legislation that regulates the sector, and to all consumers of media products in Turkey. After all, the call for a free, independent, pluralist and democratic media is not merely voiced by civilians, but a *sine qua non* of a healthy economy and politics.



# Preface

**Erol Katircioğlu**, *Istanbul Bilgi University*

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When we say “media”, we think of a wide range of activities including news, commercials, films, music, discussion programmes, contests, arts and sports. When we consider that all these activities are associated with the cultural and intellectual world of a society, the importance of the media sector for modern societies becomes more highlighted. Since the media sector carries a unique importance compared to other sectors, the issue of by whom and how these activities are carried out also becomes important. This is because the possibility of private or public power centres regarding the media as a tool to manipulate their own interests is not something that can be ignored. On the contrary, since it is prone to be abused exactly for this purpose in modern societies, the media has always been a sector that requires public regulation. Just like the energy, water and communications sectors.

As the modern life, getting more and more complex every day, increases the demand for communication, the communication technologies also develop. And the development of communication technologies changes the modern man and his knowledge and perception on the society in which he is living and the world. It can be said that the process we call “globalization” is exactly this, and virtually all the changes indicating this process are the work of communication technologies and the media.

While the physical existence of the world is becoming smaller in the eyes of the modern

man thanks to the opportunities provided by communication technologies and the media, the modern man starts to attribute more importance to his own life, his own choices, values and thoughts. Just as the awareness that the mankind has long been mistreating the world caused an increase in environmental actions, the importance that individuals, as consumers and political subjects, have started to attribute to their own demands today causes a new and democratic production approach called “flexible production”, and raises the notion of a “participatory” democracy.

In today’s world, the importance of the media, which we are trying to underline, stems in particular from its power to shape the perceptions, thoughts and values of people. Similar to how media is the first to come to mind as a propaganda tool in events of conflicts and wars, media is also the first to come to mind in the shaping of economic and political expectations. Therefore, the idea of controlling the media and thereby securing an influence on the expectations, thoughts and perceptions of the whole society makes the media indispensable for some power holders, and the media sector becomes the focus and domain of the quests for “power” in the society.

On the other hand, media encourages people to get informed about themselves and their societies, and therefore has a key importance in the formation of a more democratic society. The learning process of the society requires

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time, and debates carried out through the media speed up this learning process. Programmes on various subjects speed up the information uptake of the society and help shaping and spreading individual and social thoughts and views. Therefore, the media is an indispensable instrument in the democratization processes of societies.

This study was prepared by Ceren Sözeri and Zeynep Güney, and focuses on the structural characteristics of the media sector in Turkey. The authors address the sector-related regulations and the developments occurring during the course of time in these regulations, and then provide an assessment of the place of the media sector in Turkey's economy. In this framework, the authors analyze not only the competitive structure created in the sector by

the companies and company groups operating in it, but also the structures of the subsectors forming the media sector. Sözeri and Güney also address the labour relations and working conditions, a subject that rarely finds its way into this type of studies. This dimension, also addressed with regard to subsectors, has in general made significant contributions that deepen our thoughts on the problems seen in the media.

By supporting this study by Sözeri and Güney, TESEV Democratization Program adds to the light it has already shed on the other problem areas of the society. And it is very clear that these efforts mean making important contributions to the development of the mentalities in Turkey.

# Introduction

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It is important to know in what kind of an economic environment the media—which produces news, ideas and entertainment and has the power to influence society by its very nature—operates and by whom it is controlled, since the formulation and implementation of the policies that make the media all have cultural, social, political and economic consequences. As it is in Turkey, media companies in many countries are for-profit entities that are subject to market conditions just like any other firm. In addition, the product structures, production organizations, revenue and expenditure structures of media companies and the conditions of the markets in which they operate have some very unique characteristics. While the media industry is generally characterized by factors such as the great quantity of capital required to invest in this area, the dependence on advertising revenues, and government policies, when looked at from a broader perspective, it becomes clear that the economic policies prevailing in the world also have an effect on the sector.

In Turkey, media began its industrialization phase in the 1960s; the effect of economic factors increased with the advent of the 1980s. Neoliberal economic ideas and deregulation policies, which affected Turkey along with the rest of the world, led publishers of newspapers and magazines to take steps toward becoming holding companies; and capital owners active in other sectors to turn toward this new area. This trend of becoming holding companies

gained momentum with the launch of private television and radio broadcasting in the 1990s. Media groups, who increased their power through vertical and horizontal mergers, also pursued competition strategies which came to the fore at times with the cartels they had set up and at others with promotion wars, were negatively affected by the 2001 crisis. The media groups with investments in the financial sector were particularly affected by the crisis, with some of them becoming totally wiped out of the market and some transferred to the Savings Deposit Insurance Fund (TMSF). As of 2002, TMSF began selling the media organizations in its possession; in parallel with the positive developments in the economy, the interest of foreign investors in the media began increasing, especially from 2005 onwards.

In this study, the structure of the markets in which the media sector operates in Turkey as of 2010, the economic/political/cultural factors affecting this structure, and the behaviours of the players active in these markets are examined, aiming at contributing to the debates on their socio-economic outcomes and effects on democracy and pluralism. The media sector, which has been growing in recent years by also taking the entertainment sector under its umbrella and which has almost reached a size of \$500 billion<sup>1</sup> in the global economy, has a highly dynamic structure. Therefore, the picture presented in this study is limited to the

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1 ZenithOptimedia data.



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2010 outlook of the media sector in Turkey. Hence, it should be borne in mind that the snapshot offered in this report regarding the rapidly-evolving media sector can change in a very short time.

After defining the economic and legal environment affecting the media sector, the study examines those media groups active in many of the media markets in Turkey within a general framework drawing on components such as the market structure and the structure-conduct-performance paradigm.<sup>2</sup> In this study, in addition to the data on the sectoral structure, labour relations have also been included in an attempt to expose the nefarious effect of working conditions, which distinguish the media sector in Turkey from its counterparts in the world, particularly on its economic and social performance. As frequently encountered in researches conducted in this area, since records concerning the sector are not adequately kept or cannot be properly classified, and since the market data in particular are included under the rubric of trade secrets, it has been impossible to access the data that were the subject of the study. Therefore, the evaluations were concretized based solely on the data that the commercial organizations could share from the data they have gathered via research companies.

After an evaluation of the media sector in general, the study examines some more detailed data on the subsectors of the media and discusses how the new markets, emerging with the advance of new technologies, will affect the media sector. Cinema, because of its

different ownership and operational structure, and the outdoor<sup>3</sup> sector, because it is used only as an advertising channel, were left outside of the study scope. The scope was limited to the national and mainstream media due to their wide effect and considerations of time; hence the local media was not addressed below.

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2 The study *Medya Ekonomisi ve Türkiye Örneği (The Media Economy and the Turkey Example)*, (Ankara: Haberal Eğitim Vakfı, 1998) by Alev Söylemez is an important reference on the application of this paradigm on the media sector in Turkey.

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3 **Outdoor Advertising:** A type of advertising that uses building walls, billboards and bus stops as its communication channels.





# Legal Regulations Affecting the Media Sector in Turkey

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Media policies in Turkey went through a change with the liberalization of the market and its expansion into the international arena. Regulations that had once focused on public service broadcasting now focus on regulating commercial broadcasting, protecting the competition and preventing monopolization, as in European Union countries. The most important reason behind this change is the rapid expansion in technology, yet the aim to align the regulations on the media between countries, especially in the European Union, has also played a part.

In this section, we will first address the area of radio and television broadcasting, which is subject to more restrictive and preventive regulations compared to other outlets; we will then take a look at the regulations in the area of the printed press and the Internet to the extent that they concern the formation of the sector.

The legal changes that allowed for the establishment of and broadcasting by private radio and television enterprises in Turkey began with the amendment made in article 133 of the Constitution, which was the legal basis of the public monopoly on broadcasting. Then, in 1994, Law no. 3984 on the Establishment of Radio and Television Enterprises and their Broadcasts came into effect. The rapidly advancing technology and the amendment of Law no. 3984 in 2002 by Law no. 4756 made it necessary to create a new law, especially after the cancellation of its articles on media ownership by the Constitutional Court; hence, on 3 March 2011, Law no. 6112 on the Establishment of Radio and Television Enterprises and Their Broadcasts

came into effect. In this study, Law no. 6112 is more widely referred to, as it is the most up-to-date legislation in this area and includes many articles that affect the formation of the market. It also has a scope that broadened with the convergence that occurred as a result of technological developments.

Among the reasons that led to the drafting of Law no. 6112 was the desire to comply with European Union regulations. Therefore, in preparing the Law, the *Audiovisual Media Services Directive* 89/552/EEC dated 3 October 1989 of the European Parliament and of the Council was taken into consideration to a significant extent. The new law, which is much more comprehensive than Law no. 3984 and which also covers the broadcasters emerging with the use of new technologies (such as on-demand service providers), appears to be in harmony with the Directive in terms of scope, access, regulation of commercial communication and limits of judicial jurisdiction. However, unlike the Directive, the Law also includes regulation of radio broadcasting and even covers under its scope those media companies emerging after the launch of IPTV, which are defined as on-demand-broadcasters and which operate on the Internet.<sup>4</sup>

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4 This wide scope of the law and the effort to regulate radio broadcasting with regulations that mostly concern television broadcasting are receiving criticism. A RTÜK member said this situation was a requirement of article 133 of the 1982 Constitution. TESEV's workshop on "Regulations in the Area of Broadcasting," ("Yayıncılık Alanı Düzenlemeleri") Istanbul (11.03.2011).

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When preparing the new law, the opinions of professional organizations active in the arena of radio and TV broadcasting were gathered, and the draft law was presented to the public on the website of the Radio Television Supreme Council (RTÜK) until 3 March 2011 when it came into effect. However, after coming into force, some academicians and non-governmental organizations working in this field continued to complain that their views had not been taken into consideration, that the law regulates only commercial broadcasting instead of ensuring the freedom and diversity of the media, and that in its current condition, neither the preparation phase of the law nor its compliance with the *Audiovisual Media Services Directive* would be enough to make it a democratic law.<sup>5</sup>

Another point of criticism against the Law is to be found in its article 9, which attempts to define the principles of broadcasting services in a rather detailed way and mostly with ambiguous expressions, resulting in principles that may allow restriction of the freedom of thought. Yet, in the Directive that is accepted as a guideline in preparing this law, there are only restrictions oriented at protecting children and preventing hate speech.<sup>6</sup>

Taking a closer look at the changes introduced with Law no. 6112, what is striking is that arrangements on advertising are regulated very extensively under “commercial communi-

cation” in harmony with the Directive.<sup>7</sup> Moreover, in addition to advertising and sponsorship, concepts such as “telemarketing” and “product placement” are also included under the scope of the new law. Their applications have been described in a way that conforms to the Directive. According to the new arrangement, the proportion of any advertising spots, barring telemarketing spots, within a given hour cannot exceed 20%. Also, if the scheduled duration of the programme is greater than 30 minutes (e.g. news programmes, films produced for cinema or television, children’s programmes), the programme can be interrupted with advertising only once every 30 minutes. There is a concern that these regulations will affect advertising revenues, first of radio and television stations, and then of all subsectors. While article 8 paragraph 8 in the law regulating advertising and commercial broadcasting on radio and television prohibits placing advertising and telemarketing spots within broadcasts of religious ceremonies, there is no such restriction for other programmes, e.g. children’s programming.

The most important changes introduced by Law no. 6112 and not included within the scope regulated by the Directive are the contents of articles 19 and 20, which regulate the structure of media ownership, and articles 26 and 27, which include the regulations on frequency planning and broadcasting licenses.

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5 For the comments of the academic members of the Ankara University, Faculty of Communication: [http://ilef.ankara.edu.tr/gorsel/dosya/1275562046RTUK\\_TASLAGI\\_ILEF\\_GORUSU\\_2010.pdf](http://ilef.ankara.edu.tr/gorsel/dosya/1275562046RTUK_TASLAGI_ILEF_GORUSU_2010.pdf), The matter was also raised by the academicians participating in TESEV’s workshop on “Regulations in the Area of Broadcasting” (11.03.2011).

6 European Union’s Audiovisual Media Services Directive, dated 3 October 1989 and no. 89/552/EEC, [http://ec.europa.eu/avpolicy/reg/tvwf/index\\_en.htm](http://ec.europa.eu/avpolicy/reg/tvwf/index_en.htm).

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7 These highly comprehensive regulations even caused criticism that the new law only focuses on commercial communication and ignores the public service dimension. Communication Research Association (İLAD), “RTÜK Draft Law Evaluation Report” (“RTÜK Kanun Tasarısı Taslağı Değerlendirme Raporu”), <http://www.iletisimarastirma.org/haberler/71-rtuk-kanun-tasarisi-taslagi-degerlendirme-raporu.html> (15.01.2010).

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As previously noted, Law no. 3984 was amended in 2002 by Law no. 4756. Law no. 4756, tended to favour media owners; the annual ratings of media organizations were taken as a criterion in preventing concentration in the media sector, and a very difficult to reach upper threshold was set<sup>8</sup> (article 29); hence, the article did not serve the function of preventing concentration. On the other hand, paragraphs (d) and (e) of Article 29 governing this matter was stayed by the Constitutional Court upon the application of the President and was eventually cancelled in 2004.

In the new Law no. 6112, the establishment and share ratios of radio and television organizations are regulated in article 19. Said article gave the right to establish radio and television organizations only to corporations, as was the case in the previous law; it repealed the provision of the previous law reading “production, investment, export, import, marketing and finance organizations shall not be permitted to engage in radio and television broadcasting,” yet once again prevented political parties, trade unions, professional organizations, co-ops, associations and local administrations from owning radio or television organizations.<sup>9</sup> With paragraph (ç) of article 19 of the Law, private radio and television organizations may be publicly traded at

the stock exchange, a provision that differs from the previous law. In paragraph (d), a limitation based on terrestrial broadcasting licences is introduced for media ownership. Unlike the previous law, this law accepts the share of commercial communication, covering advertising and other sponsorships, as a criterion for protecting competition and preventing monopolization in the media markets. This arrangement prevents a media organization from getting more than 30% of all commercial communication revenues in the market:<sup>10</sup>

d) Real or legal entities can become direct or indirect shareholders in a maximum of four media service providers holding terrestrial broadcasting licenses.

However, in the case of multiple media service providers held by a shareholder, the annual total commercial communication income of media service provider enterprises where a real or legal entity has direct or indirect shareholding may not exceed 30% of the total commercial communication income of the sector for the relevant year. Real or legal entities whose total commercial communication incomes exceed this rate shall transfer their shares in the media service provider enterprise to bring their total commercial communication incomes below the 30% threshold within a period of ninety days granted by the Supreme Council. Real or legal entities who fail to fulfil the requirements of the decision of the Supreme Council within the granted period shall be sentenced to an adminis-

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**8** In paragraph (e) of article 19, the criteria for limitations are specified as the viewer/listener ratings, with a 20% upper limit set for it. Considering that the highest rated station in Turkey only achieves a rating of 16%, it is clear that the limitation is not realistic and does not function as a barrier against concentration.

**9** This obstacle, which continues to exist in the new law, also receives criticism; in particular, some feel that the broadcasting ban on faculties of communication prevents news making, education and specialized broadcasting, <http://www.iletisimarastirma.org/haberler/71-rtuk-kanun-tasarisi-taslagi-degerlendirme-raporu.html>.

**10** The law does not state how this share is to be estimated. A RTÜK member has stated that the 3% share given to RTÜK by radio and television enterprises on their turnovers will be taken as a basis, hence allowing measurement of the 30% limit through monthly regular measurement. TESEV’s workshop on “Regulations in the Area of Broadcasting”, Istanbul (11.03.2011).

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trative fine of four hundred thousand Turkish Liras by the Supreme Council for each month of failure to comply with the requirements of the decision. The principles and procedures governing the implementation of this paragraph shall be determined by the Supreme Council.

How this limitation will be put into practice is somewhat vague in the law. Radio and television broadcasters and the Competition Authority of Turkey have expressed concerns that problems might arise in the implementation of this limitation. They further stated that effective implementation of the limitations on ownership and control would be sufficient.<sup>11</sup>

Another major change to media ownership introduced in the new law, which differs from Law no. 3984, is that it increases the ratio of foreign shareholding in a radio and television enterprise. Paragraphs (h) and (i) of article 29 of the previous law state that the ratio of foreign shareholding in a private radio and television broadcasting enterprise cannot exceed 25% of the paid up capital of such an enterprise; also, a real or legal foreign entity who is a shareholder in a private radio and television broadcasting enterprise cannot hold shares in another radio and television enterprise. However, this arrangement created a significant obstacle to those foreign investors who had begun showing interest in the Turkish media sector with the recent growth in the economy, and on some occasions various tactics were used to circumvent this ban.<sup>12</sup> Therefore, in article 19 paragraph (f) of the new law, said capital limit was raised to 50% and it

was stated that foreign real or legal entities could become shareholders in at most two media service provider enterprises:

f) The ratio of direct total foreign capital in a media service provider enterprise cannot exceed 50% of the paid up capital. A foreign real or legal entity can directly hold shares in a maximum of two media service provider enterprises. In the event that foreign real or legal persons participate in companies that hold shares in media service provider enterprises and hence become indirect partners, it is obligatory that the head or acting head of the board of directors of such broadcasting enterprises as well as the majority of the board of directors and the director general be citizens of the Republic of Turkey and also that the majority vote in the general assemblies of the broadcasting companies is held by real or legal persons who are nationals of the Republic of Turkey. The arrangements providing for these matters shall be clearly stated in the articles of association of the enterprise.

One of the most important regulations regarding the structuring of the media sector in Law no. 6112 on the Establishment of Radio and Television Enterprises and Their Broadcasts is no doubt the frequency planning and allocation regulated in article 26. To better understand the importance of the matter, it might be useful to recall the past of frequency distribution regarding private radio and television enterprises in Turkey.

The Radio Television Supreme Council (RTÜK), which was established with Law no. 3984 on the Establishment of Radio and Television Enterprises and Their Broadcasts coming into effect on 13 April 1994, was authorized in areas such as supervision and interruption of broadcasts and frequency distribution. In 1995,

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11 TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector," ("Medya Sektöründe Yatırım ve Rekabet İlişkileri: sektörün Bugünü ve Geleceği"), Istanbul (21.04.2011).

12 Ceren Sözeri, 2009, p. 210.

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the RTÜK stopped accepting frequency applications from private radio and television stations in order to assign frequency planning within four months; it announced that it would not be accepting any new licence applications from television enterprises after 28 April 1995 and from radio enterprises after 8 December 1995.<sup>13</sup> The tenders began to be scheduled in 1997, yet in a period of political turbulence (the 28 February process), the requirement that was introduced to prevent “separatist and reactionist” broadcasts<sup>14</sup> and making it mandatory for media owners and executives to get a National Security Certificate<sup>15</sup> created bureaucratic chaos. Consequently the planning process was halted by the Prime Ministry. In 2001, the RTÜK decided to hold the tenders, starting with national television enterprises, yet the Council of State [Danıştay] decided to stay the execution regarding the tenders. In 2002, with Law no. 4756, the duty to prepare the frequency plans was given to the Telecommunications Authority.<sup>16</sup> Due to a failure to complete the planning to date, currently in

Turkey, other than the TRT, which is a public entity, there are 23 national, 16 regional and 212 local television channels broadcasting with the temporary licences they were given. That no new licences are granted prevents the establishment of new terrestrial television channels; hence the only way for investors wanting to enter this domain is to buy an already existing licensed company.

In the new Law (article 26), frequency planning is once again transferred to the Supreme Council. Paragraph 2 of article 26 provides for allocation of frequency for the Turkish Radio-Television Corporation (TRT) as required for the capacity to make four terrestrial television and four terrestrial radio broadcasts. Paragraph 4 states that a sorting tender will be held for private radio and television enterprises; the paragraph reads as “media service provider enterprises that have been established as radio and television broadcasting companies and have operated in the field of radio and television broadcasting for at least one year, that fulfil the prerequisites specified in the tender specifications and that have obtained a qualification certificate from the Supreme Council to bid in the tender can participate in the sorting tender.” With this wording, the paragraph aims to protect the rights of enterprises that currently broadcast from this frequency and have invested in this area. Paragraph 5 of the article emphasizes that the digital frequency plan would be taken as a basis in frequency planning; in other words, foreseeing a two-year process for transition from analog to digital broadcasting.

How this planning—all stages of which are closely watched by non-governmental and professional organizations such as the Television Broadcasters’ Association (TVYD) and the Radio & Television Broadcasters Professional Union (RATEM)—will be done or

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13 Ümit Atabek, “RTÜK’ün yap(a)madıklarının eleştirisi,” <http://mediaif.emu.edu.tr/pages/atabek/docs/rtuk1.html>.

14 Erol Önderoğlu, “15 yıldır yapılamayan frekans ihalesi,” <http://www.bianet.org/bianet/medya/52937-15-yildir-yapilamayan-frekans-ihalesi> (24.01.2005).

15 The lawsuit initiated on the grounds that this certificate, given by the Prime Ministry, prevents freedom of the media, was decided by the 13th Chamber of the Council of State in 2005, and the court decision stated that the amendment made in the regulation includes measures to ensure national security, national interests, public interest and rectification of legal shortcomings, and does not prevent freedom of the media. For the summary resolution, please see: <http://www.danistay.gov.tr/kerisim/ozet.jsp?ozet=metin&dokid=24410>.

16 Muhsin Kılıç, “Radyo ve Televizyon Yayıncılığı Frekans Planlaması,” [http://www.rtuk.org.tr/sayfalar/IcerikGoster.aspx?icerik\\_id=52259f3c-88ad-41b9-aa6b-427274bc2671](http://www.rtuk.org.tr/sayfalar/IcerikGoster.aspx?icerik_id=52259f3c-88ad-41b9-aa6b-427274bc2671) (20.06.2002).



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how the transmitter stations from which the broadcasts will be transmitted after the planning will be operated, remain uncertain. As such, paragraph (8) of the Law makes it obligatory for broadcasters who are allocated frequency to make their broadcasts from either a single transmitter or from transmitter facilities built and operated by an operating company. However, it should be recalled that the Anten A.Ş. company, set up in 2007 with the decree of the Council of Ministers with a similar purpose, could not be brought to life when Haber-Sen applied to the Council of State on the grounds that such a practice would damage the impartiality of TRT, a public broadcasting corporation, and was found justified by the Council of State. Considering all these, although the time period specified for completing the frequency planning and then carrying out the tender process and finalizing transition to digital broadcasting seems quite short, it is clear that when all phases of the process are completed, a significant milestone will have been achieved in the area of radio-television broadcasting.

In addition to all of these, in the new law, the threat of suspending transmission in case of violation of the broadcasting principles, which can very well be described as a form of censorship, has been replaced by an initial fine followed by an administrative measure (for a maximum of five times). However, the law does provide for transmission to be suspended if the violation is repeated; the law also states that the seriousness of the violation as well as the

broadcast environment (the audience it has reached) and area will be taken into consideration when determining the sanctions to be meted out (article 32), hence preventing large media groups and small local broadcasters from being subject to the same sanction types.

Another change brought on by the new law and that affects the revenues of private radio and television companies is that the share that these companies have to transfer to the Radio and Television Supreme Council from their gross commercial communication incomes (excepting their programme sponsorship incomes) has dropped from 5% to 3%. Both by RTÜK and the Directorate General of Press Advertisement (BİK) expressed that these shares transferred to RTÜK would be used to strengthen the local media.<sup>17</sup>

As a result, in Law no. 6112 on the Establishment of Radio and Television Enterprises and Their Broadcasts, which was prepared in consideration of the process of alignment with the EU and the advancing technologies, the broadcasting principles are more detailed while the ambiguous expressions that have the potential to restrict freedom of expression are maintained, and that broadcasting types other than commercial broadcasting are further restricted. It is clear that this situation is not in conformity with the regulations of the EU. On the other hand, the area of commercial broadcasting on which the Law focuses is regulated more extensively by filling the gaps existing in the previous law. However, what draws attention here is that although radio broadcasting is not included under the scope of

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<sup>17</sup> Directorate General of Press Advertisement, “Kanun teklifi TBMM’de ‘RTÜK ile anlaştık. Kamu reklamları payını alıp yerele dağıtacağız’”, [http://www.bik.gov.tr/web/kanun-teklifi-tbmm%E2%80%99de-%E2%80%99Crtuk-ile-anlastik-kamu-reklamlari-payini-alip-yerele-dagitacagiz%E2%80%9D\(06.04.2011\)](http://www.bik.gov.tr/web/kanun-teklifi-tbmm%E2%80%99de-%E2%80%99Crtuk-ile-anlastik-kamu-reklamlari-payini-alip-yerele-dagitacagiz%E2%80%9D(06.04.2011)).

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the Directive accepted as the guideline, the new law tries to regulate both the radio and the television broadcasting areas, since article 133 of the Constitution holds RTÜK responsible for regulating these areas; yet, because of television's dominant characteristics, the area of radio broadcasting is left in the background. It is considered that separate regulation of these two broadcasting areas will be more beneficial, particularly in terms of the development of radio broadcasting.

The new law, which focuses on media ownership only of commercial enterprises and which considerably broadens the restrictions on ownership contained in the former law, brings a new system that focuses on market shares in order to prevent monopolization. However, the law does not include a clear regulation on how these shares will be measured and how they will be reduced. In addition, although several barriers are erected against owning more than one enterprise in the area of radio and television broadcasting, and although the law has tried to give new investors the opportunity to enter the market and ensure entrance gating and fair distribution of frequency planning, the fact that there are no regulations on cross-ownership either in the new law or in the other relevant laws makes it possible for a media enterprise to exist or even become dominant in a multitude of channels. In addition, the Law removes the obstacles that prevented media enterprises that were also active in other media channels from participating in public tenders or operating in the financial sector, which also means removal of the obstacles that prevented media owners from using the tools available to them for their political and economic interests.

Another law addressing media-related arrangements is the Press Law no. 5187, which was amended in 2004. Like the Press Law no. 5680 that came into effect in 1950, the new Press Law also does not contain any provisions

on preventing concentration in the media sector. In Law no. 5680, ownership is regulated with article 6 which states that "if the owner of a periodical is below 18 years of age or restricted, paragraph 2 of article 5 (conditions for eligibility for the position of responsible editor) shall apply to the legal representative, and if the owner is a corporate body, it shall also apply to the authorized representative." The Law only seeks the principle of reciprocity for foreign real or legal entities that wish to publish magazines in Turkey (article 5). In other words, a foreigner wishing to own a periodical in Turkey can do so only if Turkish citizens are allowed to own periodicals in the foreigner's country.

The final law that may be included in this area is Law no. 5651 on Regulation of Broadcasts on the Internet and on the Fight against Crimes Committed through the Internet, which came into effect in 2007. This law regulates the obligations and responsibilities of content, domain, access and collective usage providers. Among these stipulations, those with the highest relevance to the media sector are the regulations concerning content providers. Article 8 of the Law defines the cases in which access can be banned with regard to broadcasts on the Internet. This article first lists the crimes included under the Turkish Penal Code no. 5237, namely:

- 1) Soliciting or encouraging a person to commit suicide (article 84),
- 2) The sexual abuse of children (article 103, paragraph 1),
- 3) Facilitating the use of addictive or depressant/stimulant drugs (article 190),
- 4) Providing or delivering substances that are hazardous to health (article 194),
- 5) Obscenity (article 226),
- 6) Prostitution (article 227),
- 7) Arranging a place or facility for gambling (article 228),

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as well as the crimes included in Law no. 5816 on Crimes Committed Against Atatürk are considered grounds for banning access.

The decisions to ban access, which have the most effect on Internet publishing, are given by a judge during the investigation phase or by the court during the prosecution phase (paragraph 2). After a decision is reached, a copy of said decision to block access is sent to the Telecommunication Communication Authority (TİB) for execution. Even if the content and domain providers are located abroad, the decision to block access to the content is implemented after the decision is reached against the aforementioned violations (paragraph 4).

The content and frequency of decisions to block access in Turkey receive much criticism. Turkey is even listed among those countries that restrict access to information on the Internet and is on the watchlist under the “Enemies of the Internet Report” released by Reporters Without Borders (RSF) on 12 March 2011 on the occasion of the World Day Against Cyber-Censorship.<sup>18</sup> Media experts have complained that the situations requiring blocking access to content providers are couched in limited and ambiguous terms, that blocking access is usually done based on the domain name and as a result blocks access to all content included under that same domain name. Further, in cases where the content provider or domain provider is abroad, the TİB decision can be executed with no further need to submit it for a judge’s approval.<sup>19</sup>

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18 Reporters Without Borders, “Internet Enemies,” <http://march12.rsf.org/en/> (2011).

19 “5651 Sayılı Kanun Çerçevesinde Erişim Engelleme Kararları” [Decisions on the Access Ban under the Law no. 5651], [http://www.internethukuk.com/index.php?option=com\\_content&view=article&id=77:5651-sayil-kanun-cercevesinde-eriim-engelleme-kararlar&catid=34:genel-kategori&Itemid=50](http://www.internethukuk.com/index.php?option=com_content&view=article&id=77:5651-sayil-kanun-cercevesinde-eriim-engelleme-kararlar&catid=34:genel-kategori&Itemid=50).

In addition to the relevant articles of the Internet Law, the Directorate General of Press Advertisement and the Directorate General of Press and Information have announced that a new law focusing specifically on Internet media is currently being prepared.<sup>20</sup>

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Media markets that attract interest due to their potential to influence the public and that require high investment costs (the effect of economies of scale) operate under the conditions of monopolist market structures almost everywhere in the world, and their healthy operation is possible only through sound regulation. In countries such as Turkey, the reason for the concentration in the market has been due to the problems in regulation, in addition to or more so than to economies of scale. Besides having its own legal regulations, the media sector, like all other sectors, is also subject to the regulations of the Competition

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20 “İnternet Medya Yasası Hazır”, <http://www.haberbiz.com/guncel/internet-medya-yasasi-hazir.htm> (17.02.2011).

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Law and supervision of the Competition Authority so as to prevent concentration. The Competition Authority examines the applications concerning the media sector on the basis of violation of competitive practices, creating a dominant position in the market, and abuse of dominant position, all of which are governed by the provisions of the Competition Law no. 4054. In Turkey, the Competition Authority has ratified many decisions concerning media markets. The Competition Authority's Committee Chairman and Expert Department Head expressed, at a relevant workshop, that since it is a sector that is almost always in the limelight, only 10% of the applications made are examined and ruled, in conformity with the legislation, and that the support of those operating in the sector is needed in order to develop and implement more effective supervision and better legislation.<sup>21</sup>

As can be seen in the analyses above, legislation regulating the media sector, and the authorities implementing this legislation are both numerous and diverse. However, there are no official ties between these authorities, with the result that sometimes the legislations can contradict one another. For example, although they do virtually the same job as their colleagues in newspapers and television, journalists working in Internet publishing cannot get press cards. While there is an attempt to solve this problem with legislation specific to the area of Internet journalism, it is also necessary to make changes in the legislation of the Directorate General of Press and Information, which is the authority tasked with distributing press cards. The Directorate General of Press Advertisement carries out

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activities to strengthen the local media and can supervise employment in the local media with the powers conferred upon it (the situation of the journalists that should be employed under Law no. 5953). Along with the institutions themselves and the powers granted them, another issue needing to be addressed is how coordination between these various institutions is to be ensured. It would undoubtedly be beneficial in terms of coordination to create a structure similar to the *Federal Communications Commission (FCC)* in the USA, or the *Conseil Supérieur de l'Audiovisuel (CSA)* in France, or the British Ofcom, an umbrella organization which regulates the whole communications sector in terms of both broadcasting and competition in the UK. However, what should be kept in mind here is

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21 TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector". Istanbul (21.04.2011).

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# Labour Relations in the Turkish Media Sector

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The rights of employees in Turkey were first set out in the Labour Law that came into effect in 1936, yet journalists were excluded from the scope of the Law. For journalists, the Press Association Act no. 5311 came into effect in 1938. Although the Press Association Act was one of the practices of the single-party government and was mainly based on the idea of having all journalists organize under one chamber and banning those not registered to the Chamber from performing the profession of journalism, it laid the groundwork for Law no. 5953 on the Regulation of the Employee-Employer Relations in the Journalism Profession.

Although by the end of the single-party regime the Republican People's Party (RPP) softened the strict control on the press (such as abrogating article 50 of the Press Law that allowed for temporarily closing down newspapers and magazines with a resolution of the Council of Ministers for publications that may harm the general politics of the country) with the fear of losing power, both the economic hardships caused by World War II and the consequent drop in advertising revenues, and the attitude of balance adopted by İsmet İnönü regarding the war, did not allow newspapers and magazines to be published in an environment of freedom.

A short time before the establishment of the Democrat Party, Celal Bayar, one of the oppositional deputies, tabled a motion in parliament, asking the government to transfer its power to close down newspapers to the

courts, have the application process for issuing a newspaper shortened, and prevent arbitrariness. With this attitude, the Democrat Party won over the support of the majority of the press even before their subsequent election.

The Democrat Party, coming to power by winning the 1950 elections, did what was expected of it and changed the Law on Printing Houses and the Press Law in the first year of its rule. According to the new Press Law, the requirement to obtain permission to issue newspapers or magazines was abrogated, with declaration of such intent considered sufficient, and the jurisdiction over press offenses was given to special courts. The first years of the Democrat Party were spent in great peace with the press. Journalists were even given the right to form trade unions—along with the right to insurance, written employment contracts, weekly holidays and leaves—with Law no. 5953 that came into effect in 1952.<sup>22</sup> As a result, the Journalists' Union of Istanbul was established on 10 July 1952. Following the 1960 coup, the Committee of National Unity first established the Directorate General of Press Advertisement to prevent the arbitrary advertisement distribution practices of the government, and then added new regulations, known as "212," favouring journalists within the Law no. 5953. The first and most serious reaction to this law protecting the rights of journalists and to the existence of the Directo-

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22 Hifzi Topuz, 2003, p. 194.



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rate General of Press Advertisement came from the media bosses; the media bosses (of *Akşam*, *Cumhuriyet*, *Dünya*, *Hürriyet*, *Milliyet*, *Tercüman*, *Vatan*, *Yeni İstanbul* and *Yeni Sabah* newspapers) protested the developments by refusing to publish for three days. Those newspapers' journalists issued a newspaper called *Basın* during those 3 days with the support of the Journalists' Union. The 10<sup>th</sup> of January, when the law was amended, is now celebrated as the Day of Working Journalists.

Law no. 5953 is still in effect today and still regulates labour relations in the media. However, despite the special rights granted to journalists by the Law, for many long years the media sector has witnessed practices such as employing journalists with no insurance and employing journalists on the basis of the provisions of the Labour Law instead of on Law no. 5953.

The physical obstacles to journalists' right to organize also left them powerless and vulnerable against the media companies.<sup>23</sup> The first union was established in 1952 under the name Istanbul Journalists' Union, and reorganized in 1963 under the name Turkish Journalists' Union (TGS); however, the union's most effective period in terms of ensuring enjoyment of the right to strike and collective agreement was in the 1970s. Later on the unions of intellectual workers and printing press employees were separated from each other with the Statute on Industrial Sectors that came into effect in 1983. During and after the 1980 coup, the use of union rights was gradually weakened. In 1996, the Union

continued to lose blood despite the changes made in the Statute to enable radio and television employees to become members. In the industrial sector of journalism (sector no. 27), the most important reasons for the failure to ensure adequate enjoyment of union rights was the adverse reaction towards the union by media owners, along with the practice in which union employees would be dismissed due to their union membership and prevented from finding employment in other media enterprises,<sup>24</sup> the increasing competition between journalists originating from the low labour demand, and journalists' unwillingness to exercise their rights through their unions on the grounds that the unions failed to offer sufficient support to victimized journalists. According to the data of the Ministry of Labour and Social Security, today the Turkish Journalists Union has 4550 members; according to the same data, the ratio of unionization in the journalism sector is 28.9%. However, it is hard to say that even these numbers are reliable, as not all of these memberships are active.<sup>25</sup>

Although there have been positive developments since the 1990s, most of the problems concerning the working conditions of journalists still exist today. On the other hand, the competition in the workforce and the fear of unemployment prevent journalists from voicing their problems even through the media they are working with.<sup>26</sup> In addition to informal

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23 According to the results of a survey commissioned by the Journalists Union of Turkey (TGS) in 1995, 70% of the journalists have worked without insurance for varying periods. For detailed information, please see: Atilla Özsever, *Tekelci Medya Örgütsüz Gazeteci*, Ankara: İmge Kitabevi, 2004.

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24 TESEV's workshop on the "Labour Relations in the Media Sector" ("Medyada Sektöründe Çalışma İlişkileri") (18.12.2010 – Ankara and 21.12.2010 – İstanbul).

25 Ahmet Tulgar, "TGS: 'Sendikaya üye olanları işverenden gizliyoruz'".

26 For an example, please see: "Medya Toplu İşten Çıkarmalarla Sarsılırken Sabah Grubu ve Habertürk'teki 'Küçülme' İnternet Sayfalarına Yansımadı", (27.01.2011), <http://www.internethaber.com/bu-haberi-vermeye-yurekleri-yetmedi-32404oh.htm>.

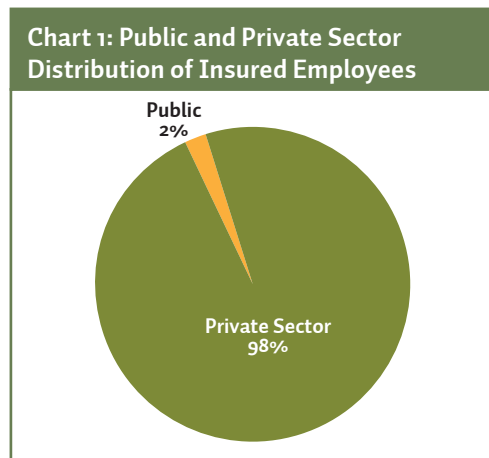
employment issues, it is also impossible to find a reliable source on the employment numbers in the media sector. For the purposes of this study, the data provided by the Social Security Institution (SGK), Household Labour Force Survey of the Turkish Statistical Institute (TURKSTAT) and again the printed media statistics of TURKSTAT were used. However, using all these data, the authors were able to reach only the number of insured employees in the media sector and failed to find the data on the number of those employed as journalists under the scope of Law no. 5953. Among the SGK data, the following classifications included under the media sector in the NACE<sup>27</sup> were used:

- Publishing of newspapers;
- Publication of journals and magazines;
- Motion picture, video and television programme production activities;
- Motion picture, video and television programme post-production activities;
- Motion picture, video and television programme distribution activities;
- Sound recording and music publishing activities;
- Radio broadcasting;
- Television programming and broadcasting activities;
- Web portals,
- News agency activities.<sup>28</sup>

27 NACE (Nomenclature Générale des Activités Economiques dans les Communautés Européennes): the system used for statistical classification of economic activities in EU countries.

28 It is understood that some of these classifications would fall outside the scope of the media sector analyzed here or could enter the scope of associated sectors. However, the limits of the classification were broadened for the sake of comprehensiveness.

In the SGK data for November 2010, the number of employees working in the aforementioned economic activity areas was 22.927. A great majority of them were employed in the private sector.



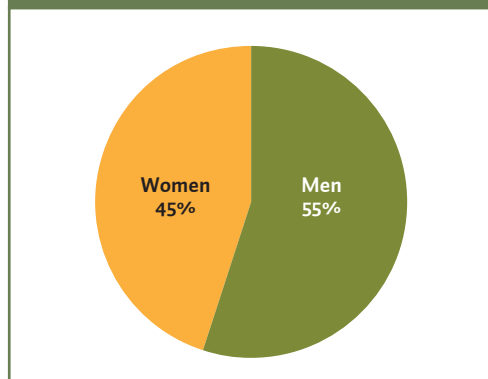
Source: SGK data (November 2010)

In Turkey, journalists working in print and visual media under the scope of Law no. 5953 become eligible for a Press Card a short time after starting work. Said card can only be issued to owners and heads of boards of directors of print and visual media corporations, members of the relevant public institutions (members of the TGNA, Provincial or Municipal Councils, RTÜK, member or auditing member of the general assembly or board of directors of BİK, members of the board of directors of TRT, members of the board of directors of the Anadolu Ajansı, etc.) and lecturing academics working in the field of journalism. According to the data obtained from the Directorate General of Press and Information (BYGEM), currently there are, in total, 11,876 Press Card holders of which 7566 of them are holders of regular Press Cards, 3957 of them Permanent Press Cards (issued only to those who have held a Press Card for at least eighteen years), 141 of them Free Press

Cards (a Press Card issued in the event of unemployment of a temporary duration), and 212 of them Press Honour Cards (Permanent Press Cards according to the former regulation). When calculated along with the SGK data and taking into consideration the academics and employees of public institutions who are also eligible for Press Cards, it is clear that Press Card ownership among insured employees of the media sector in Turkey is considerably low. It is likely that this is associated with the low number of journalists working under the scope of Law no. 5953 in the Turkish media sector. Again according to the BYGEM data, the very low number of Free Press Cards issued to journalists in cases of unemployment of a temporary duration shows that journalists are not able to benefit sufficiently from this facility when they find themselves unemployed.

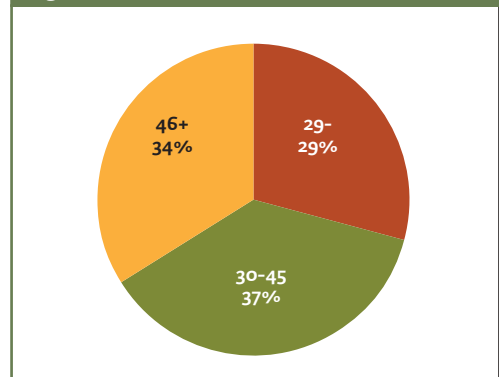
Within the scope of the SGK data, it can be said that the age and gender breakdown of those employed in the relevant areas of the sector are generally balanced. The difference manifests itself in the breakdown within the subsectors. Detailed information on the age and gender distribution of those employed in the media subsectors are addressed in the following sections.

**Chart 2: Distribution of Employees by Gender**



Source: SGK data (November 2010)

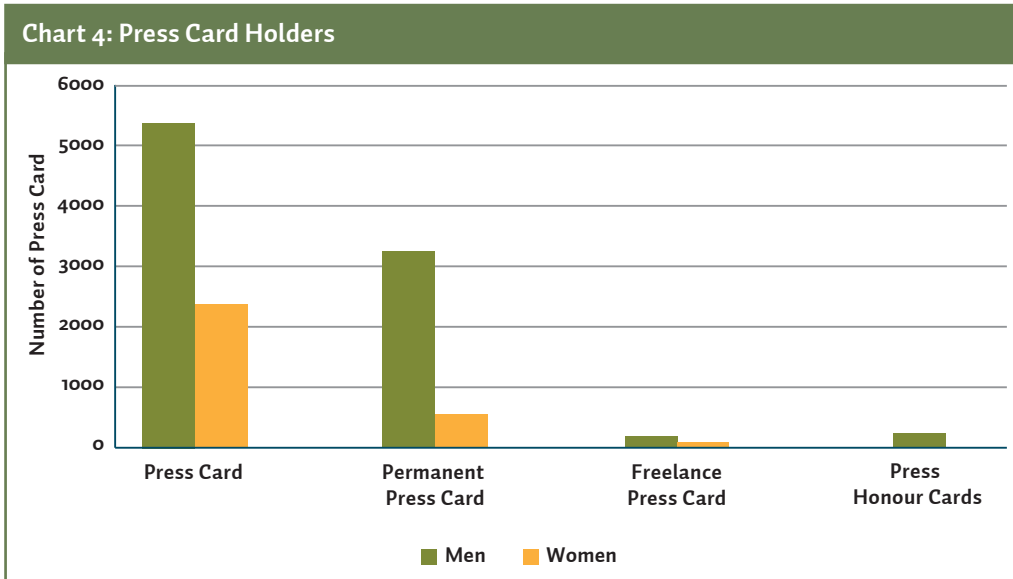
**Chart 3: Distribution of Employees by Age**



Source: SGK data (November 2010)

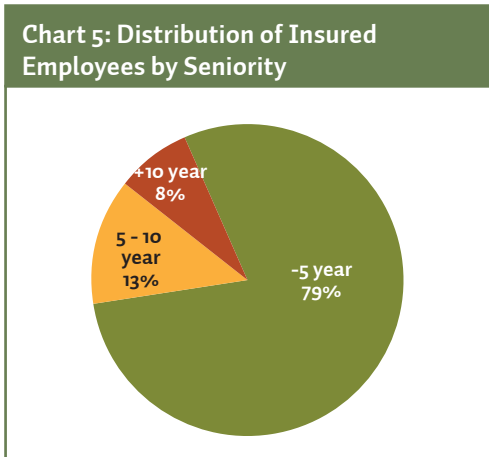
Looking at the data related to Press Card ownership, there is a marked difference between the number of women holding Press Cards and the number of men, which heavily favours the men. Especially with regard to ownership of Press Honour Cards and Permanent Press Cards, i.e. among senior journalists, the dominance of men is striking. This situation shows the male-dominated structure of the media, which frequently manifests itself in both content and discourse, while also suggesting that the majority of the employees of public institutions who are eligible to hold a Press Card are male.

While it is possible to access data on the number of employees in the media sector and their demographic/geographical distribution from various sources—although these data may occasionally contradict one another—it is considerably more challenging to access data on working conditions. The foremost reasons for this are the problems concerning the social security of employees, that journalists are frequently forced to change jobs, or, in other words, the high employee turnover rate of the sector and the reluctance of media companies to pursue a transparent policy when it comes to labour relations. According to SGK data, a



Source: BYGEM data

vast majority of the employees in the media sector have an average seniority of less than 5 years.



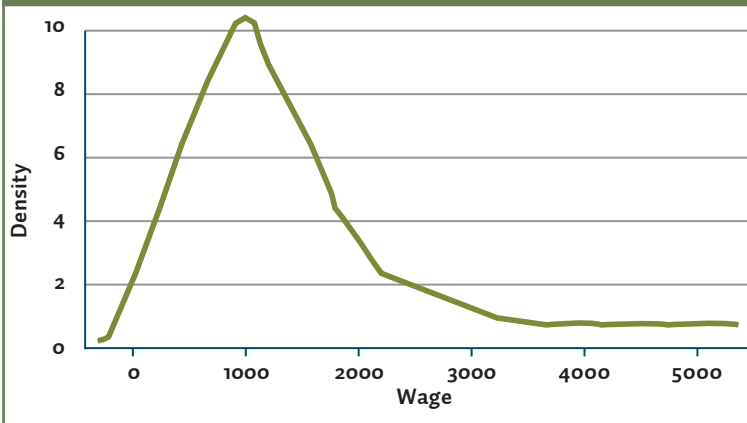
Source: SGK data (November 2010)

These data are also verified when compared to the sector-based results regarding media professions in the 2009 Household Labour Force Survey of TURKSTAT. Under the scope of this study, survey results of employees working in companies of 250 or more employees in sectors included under the media cluster were

the focus in the TURKSTAT data (a total of 100 surveys) in an attempt to reveal more concrete data on working conditions in large media groups in Turkey. According to TURKSTAT's 2009 Household Labour Force Surveys, the average seniority of those working in large media groups in Turkey is five years. This figure drops to one year when it comes to the averages in the informal sector. Similarly, according to the results of the same surveys, those formally employed in the media work 50 hours a week on average; 70% of the informal employees working on a full-time basis work 40 hours a week on average.

The surveys also include data on the wages earned by employees in the media sector. According to these figures, among survey respondents the highest monthly salary declared has been 35 thousand Turkish Liras; 25% of employees work for less than TL1000 per month, and the average monthly salary among the formally employed is TL1250. While 25% of those informally employed work for a monthly salary of less than TL500, the average monthly salary is TL560. This wage imbalance

Chart 6: Distribution of Wages in Media Groups

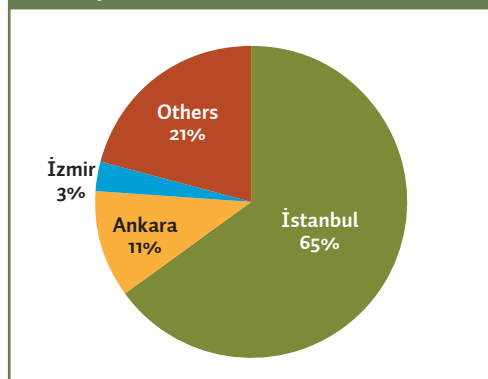


Source: TURKSTAT Household Labour Force Surveys (2009)

not only prevents labour peace, but also constitutes the root of many serious problems concerning working conditions, such as the issue of organizing.

Another important factor affecting the working and living conditions of journalists working under imbalanced wage policies and who are forced frequently to change jobs is that the private and public media enterprises where they can work are located in big cities, with a great majority of them housed in Istanbul, regarded as the centre of both capital and the media.

Chart 7: Ratio of Insured Journalists Among Total Journalists in Three Metropoles



Source: SGK data (November 2010)

The underdeveloped structure of the local media in Turkey is responsible for this situation. According to TURKSTAT's print media statistics, the total circulation rate of local and regional media in 2009 was as low as 18%.<sup>29</sup> Local media is unable to employ qualified manpower; those who wish to work in the media sector are forced to live in big cities. This situation affects not only the working conditions but also the content of media products, resulting in a unilateral flow of information where all news and information come from Istanbul.

The root cause of the insufficiency of the working conditions, the organization problems and the imbalances in geographical distribution in the media sector is the gap in legal regulations and supervision, as well as the problems in the economic structure of the media sector. As subsequent sections will show, media enterprises that do not make a profit and work under barely economically-sustainable conditions too frequently survive on the sole will of their owners. These conditions push issues such as increasing employment quality and improving working conditions to the background and result in the exertion of pressure on wages in some enterprises.

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<sup>29</sup> TURKSTAT, "Print Media Statistics," <http://www.tuik.gov.tr/kulturmedyadagitimapp/medya.zul> (2009).





# Media Sector in the Turkish Economy

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Until the 1980s, Turkey had an industrialization model based mainly on import substitution, accompanied by a market model based on a protective foreign trade regime, an exchange rate based on strict control and a fixed exchange rate system, a price control mechanism and, in many cases, a market model based on negative interest practice.<sup>30</sup> And until the 1980s, the media sector was dominated by family enterprises of long journalistic standing.<sup>31</sup>

With the decisions made on 24 January 1980, the government abandoned subventions granted to newsprint; with the development of capital and the increase of private advertisements, the dependence of the press on the state decreased. Subsequently, publications that were unable to afford paper costs and get sufficient advertisements were wiped out from the market. While the 1990s are recalled for their periods of instability in the general economy, groups investing in the media sector rapidly grew in strength with customs discounts, subsidies and low-interest loans granted by the government.<sup>32</sup>

The media sector took a big hit in the 2001 crisis along with the financial sector. With the crisis, media enterprises of corporations operating in the financial sector were either wiped out from the market or were taken over by the TMSF along with the financial organizations. The corporation most dramatically

affected by the crisis was Bilgin Group, owner of *Yeni Asır* and *Sabah* newspapers and the ATV channel, whose media activities partially came to a halt with the confiscation of Etibank. After Bilgin Group, Cine5 was left out of the sector when Erol Aksoy's İktisat Bank was transferred to TMSF, along with BRT TV with the confiscation of Kamuran Çörtük's Bayındır Bank, Kent TV with the confiscation of Mustafa Süzer's Kent Bank, and CTV with the transfer of Ceylan Group's Bank Kapital to the TMSF. In the crisis in which 3900 journalists, according to data from the Turkish Journalists Union (TGS), and 4815 journalists, according to the data from the Progressive Journalists Association, were left unemployed,<sup>33</sup> advertising revenues dropped by around 50%, from 1 billion dollars to 500 million dollars.

The sector leader Aydın Doğan, who recovered from the 2001 crisis without suffering any wounds, bid for the media enterprises of Bilgin Group, yet Bilgin Group negotiated with TMSF and leased these enterprises to Turgay Ciner's Park Group. Subsequently, Aydın Doğan provided production equipment and printing-distribution support to journalists who had left the Bilgin Group, resulting in the Bağımsız Gazeteciler Yayıncılık A.Ş. entering the market in the field of newspaper and periodical publishing. Another enterprise getting through the crisis unharmed was the Doğu Group. The Group, which operated only in the magazines sector before the crisis, bought NTV from Çağlar Group and Kanal E from a small enterprise after the crisis, and established the

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30 Mahfi Eğilmez, 2008, p. 70.

31 Hıfzı Topuz, *ibid*, p. 329.

32 Ayşen Gür, 1983, p. 146.

33 Atilla Özsever, *ibid*, p. 186.



news channel NTV and the finance and entertainment channel CNBC-E. Detailed information on media enterprises and their holdings that grew in strength after the crisis of 2001 can be found in the subsequent pages.

Following 2002, the media sector in Turkey has once again become attractive, with the increase in advertising revenues and the rapid advancement in technology. There is a positive relationship between advertising expenditure, which is the most important source of income for the media sector, and economic growth. In periods of economic upturn, companies turn a profit and increase their advertising expenditure; similarly, in periods of upturn, the increasing purchase power ups the circulation numbers in the print media, which also has a positive effect on advertising revenues. Thus, media is one of the sectors likely to suffer the most from economic crises, in a sense serving as the barometer of the crisis.

Advertising revenues in Turkey were under 1 billion dollars until the 2000s. After the 1 billion dollars mark for the first time in 2000, the economic crisis revealed itself in 2001, resulting in an almost 50% decrease in advertising revenues compared to the year before. With the recovery beginning in the first

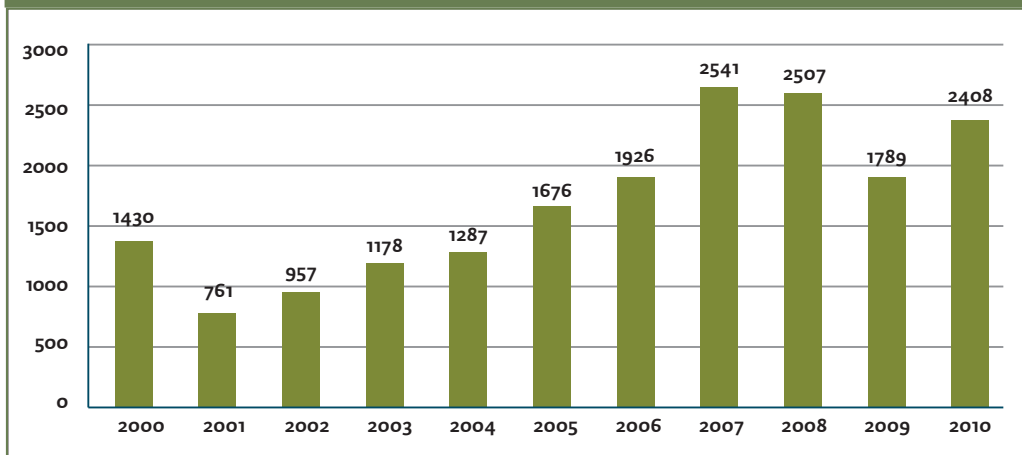
quarter of 2002, advertising revenues increased by 20% per year on average until 2007. The global economic crisis that began making itself known as of the second half of 2007 also affected advertising revenues; advertising revenues, which were TL3,308 million in 2007, dropped by 2.1% in 2008 to TL3,241 million. The impact of the crisis continued in 2009 and advertising revenues dropped by 15%. In 2010, as the effects of the crisis began to ease off, an increase of 35% on a dollar-basis, was seen in advertising revenues compared to 2009.<sup>34</sup> However, experts of the advertising sector point out that, as with all other sectors, the over-heating<sup>35</sup> in the economy in the first half of 2011 as a return of rapid growth may negatively affect the media sector.<sup>36</sup>

34 Turkish Association of Advertising Agencies, "Reklam Yatırımları Raporları, 1993-2010".

35 Mahfi Eğilmez defines the overheating of an economy as GDP growth that is not based on sound resources and that goes beyond potential growth. <http://www.radikal.com.tr/Default.aspx?aType=RadikalYazar&ArticleID=1042946&Yazar=MAHF%DD%20E%Do%DDLMEZ&Date=15.03.2011&CategoryID=101> (15.03.2011).

36 TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector", Istanbul (21.04.2011).

Chart 8: Turkey's Advertising Revenues (Million USD)



Source: Advertisers' Association

**Table 1: Growth in Advertising Revenues And Gdp Ratio**

	Unit	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010 f
Advertising Investments in Turkey	Billion TL	892	932	1,441	1,759	1,831	2,248	2,756	3,308	3,241	2,767	3,613
Advertising Investments in Turkey	Million USD	1430	761	957	1178	1287	1676	1926	2541	2507	1789	2408
Advertising Investment Growth (USD)	%		-46.82	25.82	23.11	9.27	30.22	14.89	31.92	-1.34	-28.64	34.63
GDP	Billion USD	266,439	195,545	232,280	303,262	392,206	482,685	529,187	649,125	729,443	614,470	729,050
Advertising Investments in Turkey / GDP	%	0.5	0.4	0.4	0.4	0.3	0.4	0.4	0.4	0.3	0.3	0.3
GDP per capita	USD	8,168	7,747	8,224	8,705	9,844	11,006	12,107	12,901	13,124	12,466	13,392
Economic Growth	%	7	-6	6.2	5.3	9.4	8.4	6.9	4.7	0.7	-4.7	8.5

Source: Compiled from IMF data and data from the Turkish Association of Advertising Agencies.

Despite the increase in advertising revenues, their ratio to Gross Domestic Product (GDP) is still very low. This ratio, which shows the saturation level of the market, is around 1% in developed countries, while recorded only as high as 0,5% in Turkey. The saturation level of the market shows that companies in Turkey still allocate very small budgets for advertising expenditure (with a significant portion of them spending no money at all on advertising),<sup>37</sup> while also indicating that the market has growth potential.

**Table 2: Advertising Expenditures of Countries and their GDP Ratio**

Country	Advertising Investments (Million \$)	GDP (Billion \$)	Advertising Expenditure / GDP (%)
USA	151,939	12,421,875	1.2
UK	23,715	2,280,061	1.04
Japan	40,707	4,560,671	0.89
France	13,902	Above Form 2,147,495	0.64
Germany	22,216	Above Form 2,794,478	0.79
Italy	11,721	Above Form 1,780,781	0.65
Spain	9,131	Above Form 1,132,132	0.8
Holland	5,042	Above Form 639,579	0.78
Denmark	2,317	Above Form 258,096	0.89
Norway	3,407	Above Form 302,175	1.12
Sweden	2,589	Above Form 367,162	0.7
Austria	2,268	Above Form 304,529	0.74
Greece	2,192	Above Form 246,217	0.89
Turkey	1,665	Above Form 482,685	0.34

Source: Compiled from the 2005 data of WARC, ZenithOptimedia, Turkish Association of Advertising Agencies and the IMF.

37 According to the data obtained from the Advertisers' Association of Turkey, 60% of advertising investments in Turkey are by 75 companies. For detailed information, please see: Advertisers' Association, "RVD Başkanı Hakan Gören, Ekonomi Yazarları ile Buluştu" <http://www.rvd.org.tr/CatDetails.aspx?CatId=39&Id=43>.

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Another foresight about the growth potential of the media sector in Turkey was expressed in PricewaterhouseCoopers' Global Entertainment and Media Outlook 2008-2012 Report. According to the report, media in Turkey will grow by 12.6% by 2014, and media and entertainment sectors will grow by 13% and reach over 9.5 billion dollars.<sup>38</sup>

The continuing increase in advertising revenues with the stability and positive course of the economy, and the fact that the market has not yet reached saturation make the media sector attractive for investors, especially foreign investors. The initiatives to draw foreign investors towards the media sector in Turkey began in the 1990s with the support of the government, yet without any developments beyond some license agreements in that period. The dynamism in this area started with the privatizations taking place in the telecommunications sector and during the sales process of the media enterprises which were confiscated after the crisis in 2001. Between 2002 and 2008, 35 national and 30 international mergers and purchase transactions took place in the media sector in Turkey. These transactions were at their highest level in 2005 and 2006.<sup>39</sup>

A significant portion of investors in the media sector are attracted to television broadcasting,

which gets the highest share from advertising revenues, hence the programme production companies, as well as outdoor companies and companies that have proven successful on the Internet. The flexibility introduced to the limits set against foreign investors in the TV broadcasting area, and the geopolitical position of the country reinforce the perception that the interest of foreign investors in the Turkish media sector will continue to grow; in addition, the perception has grown that investors wishing to invest have adopted the idea that they will need to contact the government directly, in addition to assessing economic conditions and fulfilling the investment-related requirements. Participants at the workshop held on the subject expressed that in many countries, including those of Europe, media investments require negotiating with the government officials of the country and a similar process is being observed in Turkey. Even if no concrete data could be found suggesting that the government steers investors, either directly or indirectly, Doğan Group's decision to downsize its investments after the tax fines, is perceived by many as the sign of Government's indirect steering and daunting the investors.<sup>40</sup> The authors of the present report got the impression that the public perceives that the government steers media investments in a similar manner in many countries, and that this situation stems from the lack of transparency of the process.

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*A significant portion of investors in the media sector are attracted to television broadcasting, which gets the highest share from advertising revenues, hence the programme production companies, as well as outdoor companies and companies that have proven successful on the Internet.*

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38 PricewaterhouseCoopers LLP, "Global Entertainment and Media Outlook: 2010–2014 Industry Overview," 2010.

39 Ceren Sözeri, 2009, p. 155.

40 TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector", Istanbul (21.04.2011).



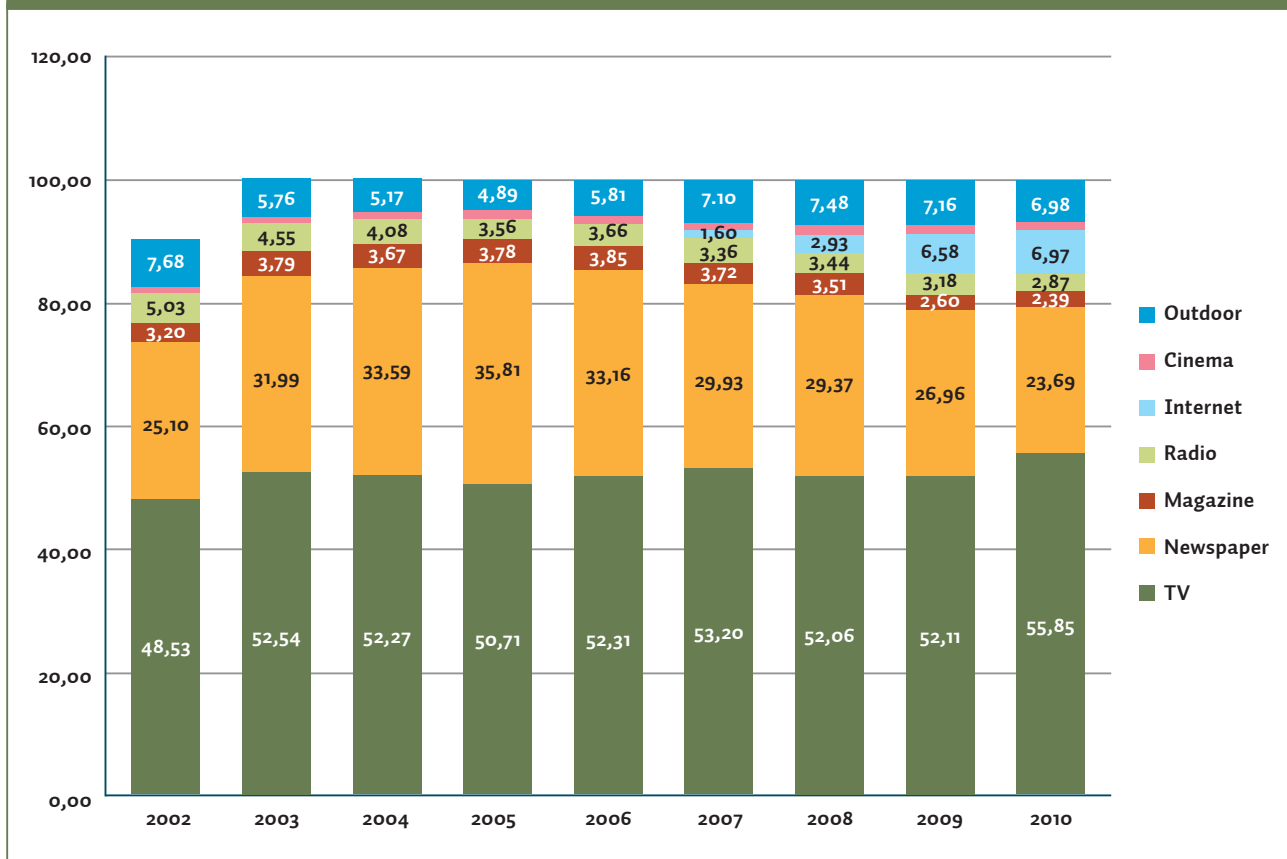


# Distribution of Advertising Revenues

In Turkey, a huge chunk of the advertising revenue is shared among television stations. The most important factor for this is the belief that television has a strong influence on public opinion because of the high television ratings in Turkey and the cheap advertisement prices in the television sector. When it comes to the distribution of advertising revenues, television is followed by print media, in which newspa-

pers get the lion's share from advertising revenues. Looking at the post-2000 course of advertising revenues, it is striking how the share of newspapers, magazines and radios gradually drops. Conversely, outdoor advertising and the Internet are the media segments that most rapidly increased their shares since 2006.

Chart 9: Distribution of Advertising Revenues by Channels (%)



Source: Turkish Association of Advertising Agencies

*In Turkey, the inadequacy of the barriers to cross-mergers has resulted in all markets continuing to exist under the dominion of a handful of media groups.*

includes a high number of differentiated products. Problems arising from the substantial amount of capital required to enter the market, and hence the situation of economies of scale, and in addition the lack of adequate regulations to prevent concentration, increase the cost of entering this market and thus create an entry barrier. In many countries, media sectors operate under monopolistic market conditions. In Turkey, the inadequacy of the barriers to cross-mergers has resulted in all markets continuing to exist under the dominion of a handful of media groups.

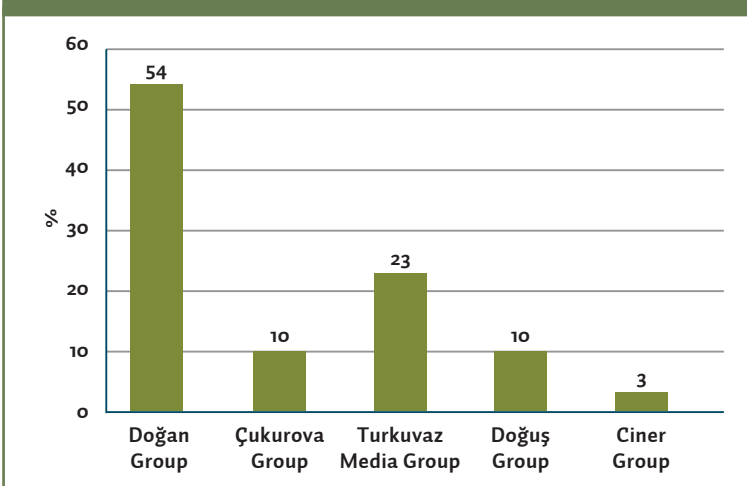
The media market, with advertising being their main source of income, operates under monopolist conditions in Turkey. According to an evaluation based on the structure-conduct-performance paradigm, the media market in Turkey has grown and is concentrated through vertical and horizontal mergers, although it

**Table 3: Shares of Media Groups in Advertising Revenues on a Per Channel Basis**

	TV (%)	Newspaper (%)	Periodical (%)	Radio (%)	Internet (%)
Doğan Group	36	58	30	8	20
Çukurova Group	12	3	6	6	1
Turkuvaz Media Group	19	24	18	2	4
Doğuş Group	8		4	9	7
Ciner Group	2	1	3		2
Other	23	14	39	75	66

Source: Mindshare, 2010

**Chart 10: Share per Media Group from Advertising Revenues Across All Channels**



Source: Mindshare (2010)

As seen in Chart 10, the media groups listed above get the highest advertisement share in all of the subsectors (other than cinema and outdoors) of the media. The shares of the Groups will be addressed in more detail in subsector analyses. Before moving on to subsectors, it might be useful to take a closer look at the large media groups that have become dominant in the media sector, and their media/non-media investments.<sup>41</sup>

<sup>41</sup> Information on the main media enterprises operating in the media sector in Turkey and the media and non-media companies owned by these groups are provided in Annex 1.

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## DOĞAN GROUP

Entering the media sector by purchasing the *Milliyet* newspaper in 1979 from the Karacan family, Aydın Doğan also acquired the Hürriyet Group and Kanal D in 1995; he also established CNNTürk in 1999. In addition to media, Aydın Doğan also has companies or partnerships in the energy, tourism, industry and commerce sectors. The Holding's media group, also entering the entertainment sector, is active in publishing (Doğan Kitap), music (DMC) and film-production (ANS, Hürriyet Yapım, D Prodüksiyon) areas. Doğan Yayın Holding, which also belongs to Doğan Group, currently has five newspapers (*Hürriyet*, *Radikal*, *Posta*, *Fanatik*, *Turkish Daily News*), one magazines group (with 27 magazines), one news agency (DHA), five TV channels (Kanal D, Star, CNNTürk, Interaktif TV and Shopping TV), one digital TV platform (D-Smart), four radio stations (Radyo D, Slowturk, Radyo Moda, CNNTürk Radyo), two publishing houses (Doğan Kitap, Doğan Egmont), one music company (DMC), one Internet company (Doğan Online), one music and book retail chain (D&R), one printing house (Doğan Ofset) and two distribution companies (YAYSAT, DPP), and is the largest media group in Turkey.<sup>42</sup>

Doğan Group was sentenced to a tax fine of 4,2 billion TL in 2009 due to the sale of Doğan TV Holding to the German Axel Springe in 2006. Doğan Group has appealed the decision and the case is still pending. With the start of this court process, Doğan Group announced its decision to downsize its investments in the media sector.<sup>43</sup> Following that, in the same period as this study was finalized; the Group announced that it had sold the *Milliyet* newspaper for 47.96 million dollars and its shares in Bağımsız Gazeteciler

Yayıncılık (Vatan newspaper) for 26 million dollars to DK Gazetecilik ve Yayıncılık, a joint venture of the Demirören – Karacan Group.<sup>44</sup>

## ÇALIK GROUP

Dinç Bilgin, who was the owner of a local paper called *Yeni Asır* in Izmir, moved to Istanbul in 1980 and established Medya Holding. In the 1990s, the Bilgin Group, initially the rival of Doğan Group, began television broadcasting with the support of Finansbank and Çukurova Group in order to strengthen its hand; it then invested in the financial sector and purchased Etibank in partnership with Çağlar Group. However, following the confiscation of Etibank during the 2001 crisis and the subsequent confiscation of its media companies, Bilgin Group negotiated with TMSF and leased these enterprises to Turgay Ciner's Park Group. The Ciner Group bought the media companies with an agreement it signed with TMSF in 2005, on payment conditions extending over 10 years. However, due to allegations of a secret agreement between Dinç Bilgin and Turgay Ciner, on 1 April 2007 TMSF confiscated the media enterprises held by Ciner with the intent to sell. These media companies were bought in December 2007 by Çalık Holding for 1.1 billion dollars and were grouped together under the name Turkuvaz Radyo Televizyon Gazetecilik ve Yayıncılık. The fact that Çalık Group borrowed from Halkbank, a public entity, for the purchase and that no other companies entered the bidding process raised significant questions. The Group holds the TV channels ATV (national) and ATV Avrupa (satellite), in addition to four newspapers, namely *Sabah*, *Yeni Asır*, *Takvim* and *Fotomaç*, and a total of 19 magazines, 14 of which are monthly and 5 weekly.<sup>45</sup>

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42 Doğan Yayın Holding, <http://www.dyh.com.tr/tr/Hakkimizda.aspx>.

43 "Aydın Doğan Yeniyl mesajında küçülme vurgusu yaptı," <http://www.gazeteciler.com/gundem/aydin-dogandan-calisanlarina-kuculme-mesaji-27956h.html> (30.12.2010).

44 "Doğan Gazetecilik'ten Milliyet ve Vatan için anlaşma açıklaması", <http://ekonomi.milliyet.com.tr/dogan-gazetecilik-ten-milliyet-ve-vatan-icin-anlasma-aciklamasi/ekonomi/ekonomidetay/21.04.2011/1380293/default.htm> (20.04.2011).

45 Turkuvaz Media Group, <http://www.calik.com/sectorler.aspx?id=24>.



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## ÇUKUROVA GROUP

The Group entered the sector in 1977 by buying the *Akşam* newspaper. Afterwards, in the early 1990s, the Group increased its investments in the media sector. The Group controls many companies in the media sector, namely the *Akşam* and *Güneş* newspapers under *Turkmedya* (*Tercüman* newspaper was closed in June 2010), the magazines *Alem*, *Platin*, *Autocar* and *Stuff*, the radio stations *Alem FM* and *Lig Radyo*, along with *ShowTV*, *SkyTürk* (television), *Mepaş* (media marketing), *Zedpaş* (advertising marketing), *Eksen Yayınıncılık* (TV/radio technical infrastructure services) and *DIGITURK* (digital broadcasting).<sup>46</sup>

The Group's digital satellite platform *DIGITURK* won the broadcasting rights of Turkey's premier league *TURKCELL Süper Ligi* for the 2010-2014 period for 321 million dollars. *Çukurova Group* also won, with its partner *MMEKA Group*, the electricity distribution contract for both sides of Istanbul—the 'Asian' and 'European' sides—in 2010.

However, the Group is having some problems concerning its partnership with *TURKCELL*, Turkey's largest GSM operator. The Russian and Finnish partners acting in concert have put an end to the Group's managing control in *TURKCELL*. The new management ended the contract with *ADD*, the company that performed the media purchase businesses of the *Çukurova Group*, which put the media companies of the *Çukurova Group* in a difficult position. The Group's *Tercüman* newspaper was closed in 2010.

## DOĞUŞ GROUP

Entering the media sector in 1999, this Group owns the news channel *NTV*, the channel *CNBC-E* that offers financial news in the daytime and entertainment content at night, and the

channels *e2*, *NTV Spor*, *NBA TV* and the music channel *Kral TV* which the group purchased in 2008 from *TMSF*. In addition, the group also owns a total of seven radio stations, namely *Kral FM*, *N101*, *NTV Radyo*, *NTV Spor*, *Radyo 5*, *Radyo Eksen*, *Radyo Voyage* and *Virgin Radyo*. Signing a license agreement in 2008 with the *Condé Nast* group, known for its international publications, *Doğuş Group* concentrated its print media activities in the area of magazine publishing, with the addition of book publishing in 2007.<sup>47</sup>

## CINER GROUP

After the media companies he had purchased from *Dinç Bilgin* were confiscated by *TMSF* on 1 April 2007, *Turgay Ciner* bought *Habertürk*, which began its broadcasting life in 1999 with a news website managed by *Ufuk Güldemir* and which continued with television broadcasting, for 35 million dollars, in 2007. Introducing in April 2009 the *Habertürk* newspaper, *Ciner Yayın Holding* has two TV channels (*Habertürk*, *Kanal 1*), one newspaper, one production company and printing facilities.<sup>48</sup> The group discontinued six magazines in 2010.

## FEZA JOURNALISM INC.

*Ali Akbulut's Feza Journalism Inc.* has four TV channels (*Samanyolu TV*, *Samanyolu Haber*, *Mehtap TV*, *Ebru TV*), two newspapers (*Zaman*, *Today's Zaman*), one magazine (*Aksiyon*), one news agency (*CHA*) and one radio station (*Burç FM*). The Company's *Zaman* newspaper is Turkey's highest circulating newspaper, with the majority of the circulation coming from sales to subscribers.<sup>49</sup>

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47 *Doğuş Grubu*, [http://www.dogusgrubu.com.tr/tr/icerik/47/2/web\\_sektorler/medya/](http://www.dogusgrubu.com.tr/tr/icerik/47/2/web_sektorler/medya/).

48 *Ciner Yayın Holding*, <http://www.parkgroup.com.tr/companies.php?CID=24>.

49 *Ekrem Dumanlı*, "Bu mantıkla tiraj yükselmez!", [http://www.zaman.com.tr/yazar.do?ya\\_zino=56520&keyfield=61626F6E65\(07.06.2004\)](http://www.zaman.com.tr/yazar.do?ya_zino=56520&keyfield=61626F6E65(07.06.2004)).

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46 *Turkmedya*, <http://www.turkmedya.com.tr/>.





# Media Subsectors in Turkey

## 5.1. TELEVISION BROADCASTING

According to data from the Radio Television Supreme Council, there are currently 24 national, 15 regional and 209 local television enterprises on air. The categorization as national, regional and local broadcasting was done in consideration of RTÜK's terrestrial broadcasting frequencies plan and the licenses granted under said plan. Yet, the developing technology and the widespread usage of satellite receiver systems continue to blur the distinction between local, regional and national broadcasting. For example, a television enterprise established in and broadcasting from the Black Sea region can have its broadcasts reach the national and even international audiences through satellite. Hence, although it may have a local broadcasting licence, it is not possible to regard such a television station as a local broadcaster. Even this change only demonstrates the need for more research and more discussion on the area of local broadcasting in Turkey.<sup>50</sup>

On the other hand, in all of these scales, television is the media channel that has the highest access rate: it reaches more than 98% of those living in Turkey.<sup>51</sup> The daily average spent watching television is 3 hours, going up

*For example, a television enterprise established in and broadcasting from the Black Sea region can have its broadcasts reach the national and even international audiences through satellite. Hence, although it may have a local broadcasting licence, it is not possible to regard such a television station as a local broadcaster.*

to 7 hours for stay at housewives.<sup>52</sup> Cable TV broadcasting services are available in 21 cities, with approximately 1 million 275 thousand subscribers. Türksat A.Ş, the cable company that broadcasts public and private television enterprises, belongs to the state and is a monopoly. The company provides both infrastructure and broadcasting services; hence it also determines the channels that can broadcast on cable. A new draft regulation on the privatization of this service has been submitted to the public by RTÜK.<sup>53</sup> The effective date of the regulation is as yet unknown.

Additionally, there are also two digital broadcasting platforms in the television broadcasting sector, one belonging to the Çukurova Group (Digiturk), and the other to the Doğan Group (D-Smart). DIGITURK has approximately 2 million 200 thousand sub-

<sup>50</sup> One of the ideas expressed at the TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector", Istanbul (21.04.2011).

<sup>51</sup> Turkish Association of Advertising Agencies, 2005.

<sup>52</sup> Mindshare, "Media Scene Türkiye," January-September 2010.

<sup>53</sup> "RTÜK's Draft Regulation on Cable Broadcasting", [http://www.rtuk.gov.tr/sayfalar/IcerikGoster.aspx?icerik\\_id=cb489879-25c6-49c2-a794-51603779e624](http://www.rtuk.gov.tr/sayfalar/IcerikGoster.aspx?icerik_id=cb489879-25c6-49c2-a794-51603779e624).

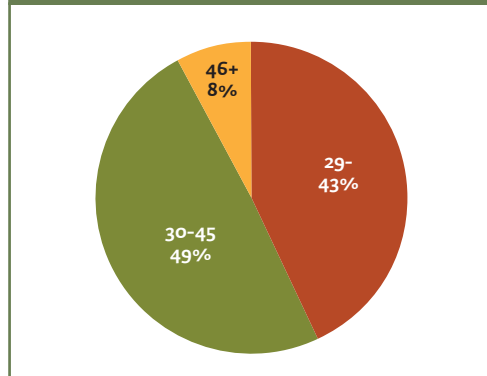
scribers, while D-Smart has 1 million 200 thousand subscribers.<sup>54</sup>

### Employee Characteristics

According to SGK data, there are 13,481 insured employees working in “television programming and broadcasting” and “motion film, video and television programme production”<sup>55</sup> sectors; 98% of the employees in the television broadcasting sector work in private enterprises with only 2% employed in the public sector; 81% of the employees work in enterprises operating out of Istanbul, followed by 8% operating out of Ankara.

Most employees of the TV broadcasting sector, which is a more recent media channel compared to the press, consist of young and middle-aged individuals; the ratio of experienced employees is low compared to other sectors. In television broadcasting, the ratio of men (67%) is far higher than women (33%).

**Chart 11: Distribution by Age of Employees in Television Broadcasting**



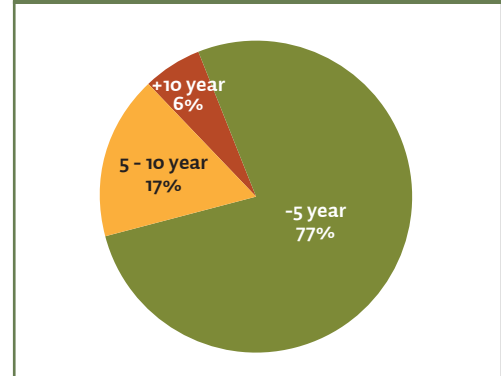
Source: SGK data (November 2010)

54 Mindshare, “Market Overview”, 2010.

55 The reason this sector is included under television broadcasting is the realization that the insured employees of the public broadcasting subsector are registered under the “motion film, video and television programmes production” subsector.

When it comes to the seniority of employees, it is clear that, in a parallel manner, the ratio of insured employees with less than five years of seniority is quite high.

**Chart 12: Seniority Statuses of Insured Employees in Television Broadcasting**



Source: SGK data (November 2010)

### Advertising Revenues and Their Distribution

The revenues of television broadcasting enterprises consist of advertising and sponsorship. As stated above, television is the media outlet that earns the highest share from advertising revenues. The high number of television enterprises and the consequently low prices of advertisements explain this phenomenon. Television broadcasters state that although they refuse almost 30% of their advertising demands, they are not experiencing growth in advertising revenues; this stems

*Television broadcasters state that although they refuse almost 30% of their advertising demands, they are not experiencing growth in advertising revenues; this stems from the competition between them.*

from the competition between them.<sup>56</sup> Small channels in particular reduce the unit prices of their advertisements so as to get a share of the advertising pie and remain competitive against the discounts large groups are able to make in their advertising tariffs. Ali Atif Bir, who audits AGB Anadolu, a company that performs long-term television audience measurements, states that the price per second for advertisements in the national channels that have the highest rating is between 75-100 dollars, going down to even one dollar in smaller channels.<sup>57</sup>

The provision of article 10 paragraph 2 of Law no. 6112 of 3 March 2011 stating that “the ratio of any commercial broadcasts other than telemarketing cannot exceed twenty percent of a clock-hour” limits the commercials’ time to 12 minutes an hour. Hence, the law has been aligned with the EU Audiovisual Media Services Directive. The time allotted for commercials, which was 8 minutes in the former implementation, has been reduced to 6 minutes. With this practice, the performance of the advertorial time is increased (with reduced loss of attention from the target audience), while the reduced time will cause a revenue loss for channels, especially with regard to programmes with high ratings. At this point, media experts foresee that TV channels will go for a price increase and that advertisers will develop new applications (increased importance to sponsorship sales, preference of audience-focused broadcasting over ratings-focused broadcasting, ad sales in credits and titles).

56 TESEV’s “Investment and Competition Relations in the Media Sector: Present and Future of the Sector”, Istanbul (21.04.2011).

57 Ali Atif Bir, “Rating sisteminde kazanan hepsini alır”, <http://www.bugun.com.tr/kose-yazisi/38387-rating-sisteminde-kazanan-hepsini-alir-#8230-makalesi.aspx> (31.08.2008).

The most important factor in the distribution of advertising shares is ratings. Ratings have been measured from 1989 to 2010 by AGB Anadolu Piyasa Araştırmaları Şirketi (A.Ş.). To ensure effective distribution of television advertisements, in 1992 television broadcasters, advertising companies and advertisers came together and established the Television Audience Research Committee (TİAK). Following long years of debates on ratings, TİAK opened a rating measurement tender in 2010, as a result of which the ratings measurement activities have been transferred to TNS Piar as of 2011. TRT left the ratings measurement system in 2010 on the grounds that TİAK’s structure did not conform to legal standards. The shares<sup>58</sup> of measurable channels in Turkey are as follows:

**Table 4: Ratings of Television Channels**

Channels	2009	2010 (Jan-Sep)
KANAL D	14.0	14.3
ATV	9.9	11.5
SHOW	10.6	8.7
STAR	8.6	9
FOX	8.1	7.1
STV	5.7	4.7
KANAL 7	4.5	4.4
TRT1	3.1	0.4
FLASH	1.8	1.9

Source: Mindshare (2010)

The distribution of shares is parallel to the distribution of advertising revenues. As seen below in Chart 13, television enterprises broadcasting nationwide on terrestrial

58 Ratings show the percentage of the target audience reached, while shares give this ratio only for TV viewers; in other words, shares are what show the market share of a channel.

frequency get the biggest share from television commercials.

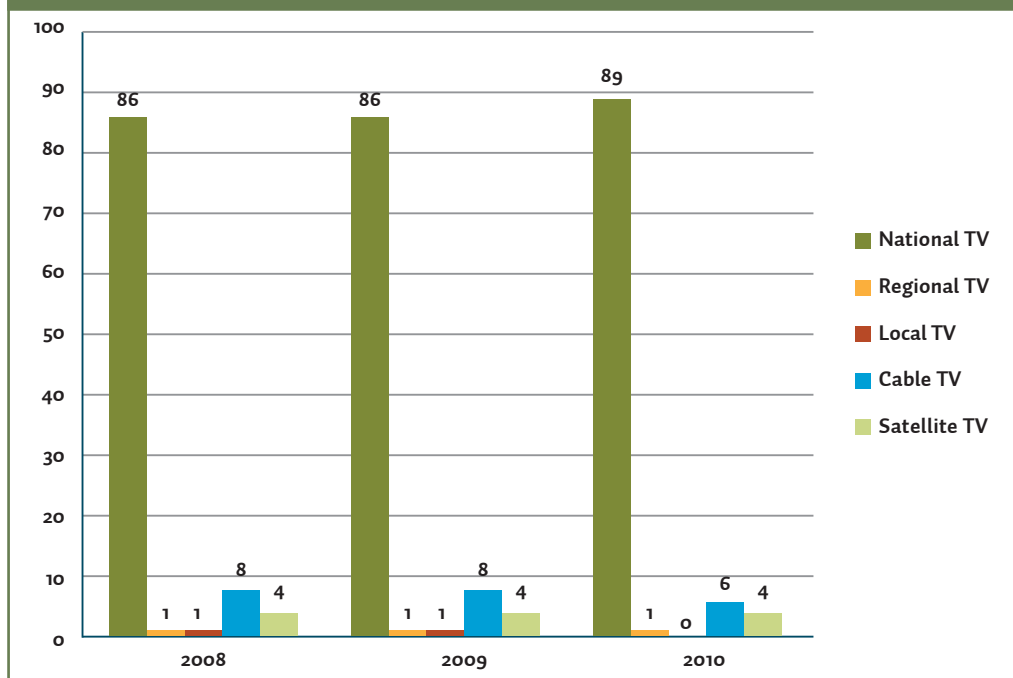
At this point, it might be useful to recall the distribution problems specific to television broadcasting, which was covered in the section on legal regulations. In Turkey, there are only 24 enterprises broadcasting nationwide on terrestrial frequency. Most of these 24 national television stations operate under large media groups. The inability to issue new licenses has prevented the establishment of any new terrestrially-broadcasting TV channels, thereby creating an entry barrier through the offices of regulatory institutions against investors wishing to enter this area. Under these circumstances, as seen in Chart 13, more than 80% of the television revenues are shared between these 25 television broadcasting enterprises that broadcast nationwide from terrestrial frequency.

However, considering the multiple ownership relationships, it should be noted that the

media groups that have more than one TV channel in TV broadcasting are dominant in a large section of the market, or that, in other words, there is a concentrated market structure. To show the density of the concentration in the market, the entire breakdown was taken into consideration, and the HHI (*Herfindahl Hirschman Index*),<sup>59</sup> that shows the concentration share of each company in the industry,

59 **Herfindahl Hirschman Index:** this index, developed by Hirschman and formulated by Herfindahl, shows the concentration share of each company in the industry and calculates the whole breakdown. According to the index, as a general tendency, if the sum of the squares of the market shares of the first two, four or six companies in a market is under 1500, then the industry is not concentrated. Values between 1500–2500 indicate a moderately concentrated market, and values above 2500 indicate a high concentration. It should be noted that these figures gradually increased and got to this point in 2010. For example, in 1992, a HHI index above 1800 was accepted as an indicator of high concentration.

Chart 13: Distribution of TV Licenses' Advertising Revenues (%)



Source: Mindshare (2010)

was used. Table 5 gives the market shares (CR%)<sup>60</sup> and concentration shares of the four media groups dominating 80% of the market. According to the standards<sup>61</sup> determined by the US Department of Justice, HHI values between 1500 and 2500 indicate a moderate concentration. Nevertheless, the big difference between the Group having the largest market share and the others is striking.

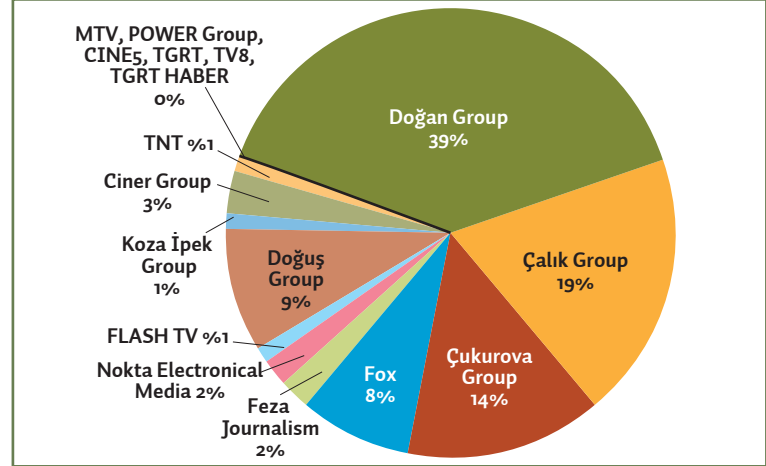
Groups	CR %	HHI
Doğan Media Group	38	1444
Turkuvaz Television Group	19	361
Çukurova Group	15	225
Doğuş Group	8	64
Total	80	2094

Source: ZenithOptimedia (2010)

An analysis of the wider distribution of the market in terms of market shares shows that many broadcast enterprises continue their broadcast activities with very small shares. As also mentioned in the section examining the legal process, one of the changes introduced by Law no. 6112 on the Establishment of Radio and Television Enterprises and Their Broadcasts is the 30% limit of market shares of television enterprises in order to prevent concentration. As clearly seen in Table 5 and Chart 14, it is expected that RTÜK will soon ask the media group with the highest market share to pull its share to below 30%. Also as previously mentioned, although there are uncertainties as to how this pulling down will be done; one

possibility is that the broadcasting enterprises may prefer to simply pay the fine and continue their broadcasts.<sup>62</sup>

**Chart 14: Media Groups' Market Share in Television Broadcasting**



Source: Mindshare (2010)

It should be noted that the ranking list of televisions getting the most advertisements and sponsorships on a time basis is not consistent with either the ratings ranking, which is in a linear proportion to advertising revenues (Table 4), or with Chart 14, which shows the distribution of advertising revenues among groups. This contradiction clearly indicates the difference between the advertisement unit prices of media groups and small broadcasters, and hence the level of competition in advertising revenues.

60 CR% (Concentration Ratio): shows market shares.

61 Herfindahl Hirschman Index-HHI, <http://www.investopedia.com/terms/h/hhi.asp>.

62 Among the ideas expressed at the TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector" Istanbul (21.04.2011).



Table 6 Television Channels Receiving the Most Advertisements <sup>63</sup>	
TV CHANNEL	DURATION
STV	7,348,924
ATV	6,920,227
NTV	6,795,448
Kanal 7	6,349,372
Fox	6,193,603
Show TV	6,035,453
Kanal D	5,976,729
Star	5,965,081
CNNTürk	5,878,871
CNBC-e	5,406,953
Habertürk	5,279,707
TGRT Haber	5,154,368
24TV	5,102,165
NTV Spor	4,802,740
Flash	4,763,492
Dizimax	4,500,114
Cine5	4,427,313
TV8	4,414,983
Kanal 7 Int	4,142,544
Euro D	4,043,403

Source: The Nielsen Company (2010)

Table 7 Television Channels Receiving the Most Sponsorship <sup>64</sup>	
TV CHANNEL	DURATION
NTV	1,348,203
ATV Europe	1,253,122
CNNTürk	1,203,120
STV	1,182,711
ATV	1,167,337
NTV Spor	1,123,897
Kanal 7	1,118,442
STV Haber	1,068,609
Show TV	1,031,641
TGRT Haber	956,766
CNBC-e	928,936
Kanal 7 Int	928,056
24TV	901,065
Star	898,976
Number 1	887,186
Kanal D	878,873
Euro D	805,683
Euro Star	740,593
Fox	737,121
Dizimax	715,944

Source: The Nielsen Company (2010)

## 5.2. PRINT MEDIA

### 5.2.1. Newspapers

According to TURKSTAT's 2009 Print Media Statistics, there are 163 national, 73 regional and 2368 local newspapers published, making

a total of 2604. Analyzing the circulation data in TURKSTAT's 2009 Print Media Statistics, it is clear that national newspaper consumption is over 80%, followed by local papers with 15.3% and regional newspapers with a share of 2.4%.

63 Telemarketing and Social Advertisements excluded.

64 Presents-Presented, Continuing, Gift, Promotion, Present, Credits, Sports, Broadcast Stream, Display Sharing Sponsorship, Filler, Smart Signs Sponsorships.

### Characteristics of Employees

According to SGK data, there are 5457 insured employees in the sector of Newspaper Publishing in Turkey. More than 40% of them are located in Istanbul; of the remaining, 12% are located in Ankara and 3% in Izmir. The ratio of men (56%) is a little over women (44%), while the average age and years of seniority are higher compared to other sectors.

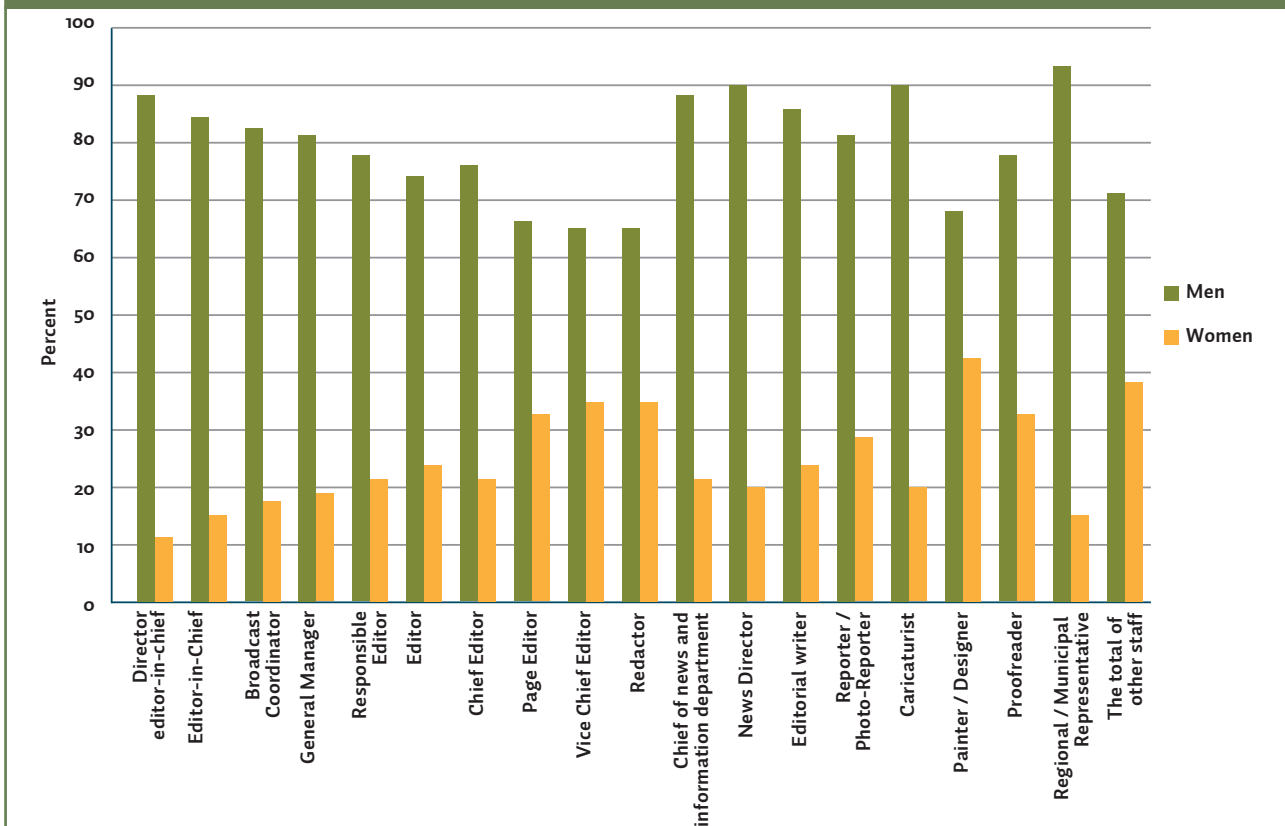
Other than this, the data obtained from the HR departments of *Hürriyet* and *Zaman* newspapers, which were interviewed under the scope of the study, match the SGK data. At *Zaman*, the majority of employees are in the 30-40 age group (62%), followed by the 40+ group (27%). At *Hürriyet*, the average age of employees was 36; 47% of the employees at *Zaman* have 1-5 years of seniority, 38% have a seniority of more

*Looking at the cadre distribution, higher-ups such as executive editors or managing editors are male-dominated, with a very low ratio of women. The data suggests that women in journalism can only find a place for themselves as graphic designers, proofreaders, editors or “other personnel.” This situation demonstrates once again the presence of the glass ceiling for women in the media.*

than 10 years, and 15% have a seniority of 6-10 years. The average seniority years at *Hürriyet* were given as 7-8 years.

When the data on the statuses of employees are compared to TURKSTAT’s 2009 Print Media Statistics, it is possible to reach more detailed and varying results. According to these statistics, which include national, regional and

Chart 15: Distribution of Newspaper Employees by Gender and Cadres



Source: TURKSTAT, Printed Media Statistics (2009)

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local newspapers, there are 18,024 people working in the newspaper publishing business.<sup>65</sup> Of these, 73% are men and 27% are women. Looking at the cadre distribution, higher-ups such as executive editors or managing editors are male-dominated, with a very low ratio of women. The data suggests that women in journalism can only find a place for themselves as graphic designers, proof-readers, editors or “other personnel.” This situation demonstrates once again the presence of the glass ceiling for women in the media, while the reality that this discrimination is effective in determining publishing policy was propounded on many occasions in studies on the issue of representation in the media.<sup>66</sup>

### Circulation

According to the Audience Research Committee (BİAK), which measures the readership of newspapers and magazines and studies reader profiles, there are 11,4 million regular newspaper readers in the general urban population of Turkey.<sup>67</sup> Turning to the circulation numbers of newspapers, their total daily sales announced to the public by the Directorate-General of Press Advertisement is, on average, around 4 million 200 thousand. These figures demonstrate that three people read one newspaper

regularly on a daily basis. Compared to past years, this indicates a decrease in newspaper sales and newspaper reading rates. The report released by OECD in 2010 shows that this state of affairs finds a parallel in many countries. Estimates seem to indicate that the decrease in Turkey is lower (16%) compared to other countries.<sup>68</sup> Nevertheless, forecasts that newspapers will meet their demise around 2020-2030 are getting stronger throughout the world, although it is estimated that this end will come a bit later in countries such as Turkey.<sup>69</sup>

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*Nevertheless, forecasts that newspapers will meet their demise around 2020-2030 are getting stronger throughout the world, although it is estimated that this end will come a bit later in countries such as Turkey.*

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Considering this blood loss for print media, promotion is still an important activity for publicity in Turkey. The promotion wars between newspapers that went as far as the distribution of pots, plates, and even white goods and cars in the 1990s were prevented with article 11 of Law no. 4077 on the Protection of the Consumer; newspapers continue to offer promotions to their readers to the extent allowed by the new law. Although the promotion-induced circulation is not precisely known, the fact that virtually all newspapers offer promotions is accepted as an indicator of a circulation dependent on such

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65 Since those working for more than one newspaper are evaluated separately in each case, it is possible that some employees were counted more than once.

66 For detailed information on this matter, please see: Ayşe Asker’s study on “Medyada Cinsiyetçilik ve Kadın Gazeteciler” (“Sexism in Media and Female Journalists”) (2004), Hülya Tufan Tanrıöver’s study on “Medya sektöründe kadın iş gücü” (“Female Workforce in the Media Sector”) (2000) and the study by Hülya Uğur Tanrıöver et al on “Medyada Kadınların Temsil Biçimleri Araştırması” (“Forms of Representation of Women in the Media”) (2008).

67 BİAK data for 11-2 Period (1 September 2009-21 August 2010).

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68 OECD Directorate for Science, Technology and Industry Committee for Information, Computer and Communications Policy, “Working Party on the Information Economy: The Evolution of News and Internet”.

69 “Futurists Envision the Newspaper in 2020”, <http://www.wan-press.org/article15384.html>.

incentives. Proposals to make the promotion bans more flexible so as to stop the decrease in circulation are currently being debated in the media itself.<sup>70</sup>

As seen in Table 8 and Annex 2, Turkey's highest selling newspaper is *Zaman*, with an average circulation of 790,000. Its closest competitors are the newspapers *Posta* and *Hürriyet*, each with an average circulation of approximately 500,000. A big portion of the sales of *Zaman* consists of sales to subscribers. The ABC Circulation Audit Committee established in 2005 by the Turkish Association of Advertising Agencies (Reklamcılar Derneği), Reklamverenler Derneği (Advertisers Association) and media enterprises, did not endorse the circulation numbers of *Zaman* in 2007, upon which the newspaper applied to the Competition Authority. After the Competition

Authority found *Zaman* justified and ruled the circulation audits of ABC void, the newspaper applied to the international circulation audit company BPA; the circulation numbers of the newspaper are still being audited by this company.

When the newspaper publishing market is evaluated from the viewpoint of circulation, there is the appearance of a market balanced in terms of competition. The concentration ratios in the market were measured with HHI values showing the market shares of the eight highest circulating newspapers based on the daily average sales numbers declared by the newspapers to the BİK (November 2010 and March 2011), and their effects on concentration. In Table 8, first the newspapers were listed in descending order starting with the newspaper with the highest average daily sales, then the ratio of the total sales of the highest eight companies to the overall sector sales numbers was calculated.

70 Ali Atıf Bir, "Medya etkisi, hastalıklar ve promosyon".

Newspapers	Nov.10			Mar.11		
	Daily Average Sales	CR %	HHI	Daily Average Sales	CR %	HHI
Zaman	877,821	21.25	451.64	848,924	19.74	389.80
Posta	451,908	10.94	119.70	485,841	11.30	127.67
Hürriyet	431,793	10.45	109.28	449,907	10.46	109.49
Sabah	342,824	8.30	68.88	350,612	8.15	66.49
Habertürk	217,211	5.26	27.65	262,784	6.11	37.35
Sözcü	210,644	5.10	26.01	228,275	5.31	28.19
Milliyet	153,056	3.71	13.73	155,725	3.62	13.12
Akşam	140,828	3.41	11.62	141,593	3.29	10.84
Total	2,826,085	68.42	828.51	2,923,661	68.00	782.95
Industry Overall	4,130,576	100.00	890.36	4,299,772	100.00	848.64

Source: BİK, (2010)

**Table 9: Concentration Levels in the Newspaper Publishing Sector (Groups)**

	On Groups Basis, November 2010			On Groups Basis, March 2011		
	Daily Average Sales	CR %	HHI	Daily Average Sales	CR %	HHI
Doğan Group	1,241,986	30.07	904.09	1,274,545	29.64	878.66
Feza Journalism	877,821	21.25	451.64	848,924	19.74	389.80
Çalık Group	452,871	10.96	120.21	461,913	10.74	115.41
Çukurova Group	242,435	5.87	34.45	242,368	5.64	31.77
Ciner Group	217,211	5.26	27.65	262,784	6.11	37.35
Estetik Press (Sözcü)	210,644	5.10	26.01	228,275	5.31	28.19
İhlas Press (Turkey)	131,057	3.17	10.07	138,978	3.23	10.45
Albayrak Group (Yeni Şafak)	103,031	2.49	6.22	116,556	2.71	7.35
Total	3,477,056	84.18	1580.33	3,574,343	83.13	1498.97
Industry Overall	4,130,576	100.00	1600.04	4,299,772	100.00	1524.95

Source: ZenithOptimedia (2010)

HHI values below 1500 indicate an industry that is not concentrated. In Table 8, the total HHI value is 828.51 for November 2010, and 782.95 for March 2011. Considering that the overall HHI value for the whole market is 890.36 for November 2010 and 848.64 for March 2011, what emerges is that although the distribution is not balanced, competition is not intense. However, this interpretation applies only when the ownership relationships of the newspapers are not taken into account; hence, it is misleading. In Table 9, it is striking how the concentration degree gets significantly higher when newspapers belonging to the same group and their shares are evaluated together.

In the evaluation based on the media groups to which the newspapers belong, the market share (CR) of the top eight groups on the basis of the average daily sales numbers for November 2010 and March 2011 goes above 80%, with relevant HHI values going up to 1600 for November 2010 and 1524 for March 2011. When values for the top four groups (Doğan, Feza, Çalık and Çukurova Groups), are analysed,

what emerges is that their market share is above 65% with an HHI of 1500. This indicates that the market is moderately concentrated (because HHI is above 1500).

On the other hand, in the final phase of the study, the Doğan Group, which had the highest share in the market, sold Milliyet and Vatan newspapers to DK Journalism and Publishing, a company arising from the partnership between the Karacan Group, which was the former long-time owner of Milliyet, and the Demirören Group. The Karacan family, which holds radio and television investments in the media, has had no investments in the print media sector for many years. Therefore, it is expected that DK Journalism, as a fresh entry to the market, will decrease, to an extent, concentration in print media. According to pre-sales data of the BİK (March 2011), it appears likely that the concentration rates will initially change as follows:<sup>71</sup>

<sup>71</sup> It should be borne in mind that these are pre-sales figures and may change in the short run due to the publishing and marketing policies pursued by the new owners.

Table 10: Concentration Levels in the Newspaper Publishing Sector After the Latest Sales (Groups)			
	Current Situation as of March 2011		
	Daily Average Sales	CR %	HHI
Doğan Group	1,002,585	23.32	543.69
Feza Journalism	848,924	19.74	389.80
Çalık Group	461,913	10.74	115.41
DK Press	271,960	6.32	40.01
Ciner Group	262,784	5.64	31.77
Çukurova Group	242,368	6.11	37.35
Estetik Press (Sözcü)	228,275	5.31	28.19
Star	146,625	3.41	11.63
Total	3,465,434	80.60	1197.85
Industry Overall	4,299,772	100.00	1229.99

Source: BİK (2010)

As seen in Table 10, the sale of two big newspapers of the Doğan Group to a group marking its entrance into the market has turned the newspaper publishing market into an un-concentrated market from a moderately concentrated market, according to US standards, based on sales.

### Advertising Revenues and Distribution

Although it looks like the revenues in the newspaper publishing sector come from only two channels, namely sales and advertisements, the real source of revenue is advertising. Efforts made to increase circulation aim at increasing advertising revenues rather than sales revenues.<sup>72</sup> This is because, as expressed before in many studies and articles on the economy of print media, in Turkey it is not possible for newspapers to survive solely on sales revenues, due both to the low purchasing power in the country and the competition

strategies pursued by market leaders. Today, newspapers sell for an average price of TL0.5, which can only serve to cover paper and printing costs; all of the human resources, marketing and administrative costs and profits come from advertising revenues.<sup>73</sup> Hence, as in other media channels, to identify the market conditions for the print media sector, advertising revenues and their distribution need to be analysed.

In Turkey, ads and announcements appearing in print media come from two different channels. The first are the official ads and announcements coming from the Directorate General of Press Advertisement; the other are the private advertisements the media itself gets from private clients. The Directorate General of Press Advertisement distributes to newspapers the announcements and special notices of public legal entities not considered under the scope of advertisement. Although a significant portion

72 In this situation, explained with the concept of circulation spiral, advertising revenues increase as the circulation increases, and the increased advertising revenues subsequently increase sales.

73 Interview with Yavuz Semerci, *Gazeteport* Head of Board of Directors and *Habertürk* writer, 20.03.2009.

*Sector experts have opined that there is a concentration in local media ownership, that publishers tend to own more than one publication in order to benefit from the announcements distributed for publishing by the BİK.*

of the announcements distributed through the Directorate General of Press Advertisement go to high-circulating newspapers, these notices and ads carry utmost importance for the survival of small-scale and local presses. Although not included under the scope of this study, sector experts have opined that there is a concentration in local media ownership, that publishers tend to own more than one publication in order to benefit from the announcements distributed for publishing by the BİK, and that the highest local administrative chiefs are effective in the distribution of official announcements in places where BİK has no offices.<sup>74</sup>

Being a state-owned authority, the legitimacy of the existence of the Directorate General of Press Advertisement, its function, and its inability to act autonomously in the fulfilment of its functions have been the topic of debates since the day it was founded. The fact that the BİK can

stop giving advertisements, as a sanction, to any publication it sees as violating the media ethics sometimes creates a censorship effect due to BİK's state-dependent structure, although it is allowed to impose such sanctions by law. Nevertheless, in recent years, the Directorate General of Press Advertisement has allocated a significant portion of its activities to strengthening the local press. It has come to an agreement with RTÜK on using the 3% contribution received by RTÜK from television channels to strengthen the local media.<sup>75</sup> The Director-General of Press Advertisement has also stated that they are carrying out activities to strengthen working conditions in the local media, ensure that employees have employment contracts in conformity with Labour Law no. 5953 and that the official advertisements are distributed fairly; they carry out audits and grant some local media enterprises a timeframe in which to fulfil requirements.<sup>76</sup>

The distribution of advertisements distributed in 2010 by the Directorate General of Press Advertisement is as follows:

75 BİK, "Kanun teklifi TBMM'de 'RTÜK ile anlaşlık. Kamu reklamları payını alıp yerele dağıtacağız'", <http://www.bik.gov.tr/web/kanun-teklifi-tbmm%E2%80%99de-%E2%80%99Crtuk-ile-anlastik-kamu-reklamlari-payini-alip-yerele-dagitacagiz%E2%80%99D> (06.04.2011).

76 Ankara workshop, 18.12.2010.

74 TESEV's workshop on "Investment and Competition Relations in the Media Sector: Present and Future of the Sector", Istanbul (21.04.2011).

**Table 11: Advertisements Distributed by the Directorate General of Press Advertisement in 2010**

Newspaper	Official Ad	Compulsory	Special Ad	Total	%
Sabah	3.747.273,30	6.145.119,95	-	9.892.393,25	8,80
Hürriyet	3.730.924,80	5.587.624,23	-	9.318.549,03	8,29
Zaman	3.746.711,70	2.557.968,49	47.526,20	6.352.206,39	5,65
Milliyet	3.389.447,70	2.837.016,17	-	6.226.463,87	5,54
Yeni Şafak	3.255.136,20	2.038.094,93	-	5.293.231,13	4,71
Posta	3.739.535,10	1.365.187,74	-	5.104.722,84	4,54
Star	3.258.827,10	1.782.231,09	-	5.041.058,19	4,49
Habertürk	3.757.133,70	1.280.853,97	-	5.037.987,67	4,48
Vatan	3.237.297,30	1.146.419,68	-	4.383.716,98	3,90

**Table 11: Advertisements Distributed by the Directorate General of Press Advertisement in 2010**

Newspaper	Official Ad	Compulsory	Special Ad	Total	%
Akşam	3.199.950,36	973.663,14	-	4.173.613,50	3,71
Bugün	3.241.478,10	850.060,09	-	4.091.538,19	3,64
Türkiye	3.101.573,70	466.978,66	150.060,80	3.718.613,16	3,31
Cumhuriyet	2.408.211,00	684.276,17	-	3.092.487,17	2,75
Sözcü	2.983.864,30	103.960,27	-	3.087.824,57	2,75
Güneş	2.692.701,90	158.903,00	-	2.851.604,90	2,54
Takvim	2.397.065,40	270.358,07	-	2.667.423,47	2,37
Taraf	2.410.433,10	169.364,42	-	2.579.797,52	2,30
Milli Gazete	2.370.381,30	108.061,31	-	2.478.442,61	2,21
Şok	2.405.440,80	2.244,00	-	2.407.684,80	2,14
Anadoluda Vakit	1.961.919,23	412.426,98	-	2.374.346,21	2,11
Türkiye'de Yeniçağ	2.209.933,80	12.420,37	-	2.222.354,17	1,98
Radikal	1.791.658,80	296.951,15	-	2.088.609,95	1,86
Dünya	782.740,50	744.258,29	-	1.526.998,79	1,36
Yeni Asya	1.305.471,09	10.409,50	-	1.315.880,59	1,17
Günboyu	1.281.336,98	-	-	1.281.336,98	1,14
Dokuz Sütun	1.103.431,00	-	-	1.103.431,00	0,98
Halkın Gazetesi Birgün	986.703,90	27.900,00	-	1.014.603,90	0,90
Ortadoğu	997.755,50	2.670,00	-	1.000.425,50	0,89
Yeni Akit	766.098,50	155.054,54	-	921.153,04	0,82
İstanbul	776.032,60	4.500,00	-	780.532,60	0,69
Bizim Anadolu	776.926,50	-	-	776.926,50	0,69
Önce Vatan	774.683,00	-	-	774.683,00	0,69
Ekonomi	767.592,00	-	-	767.592,00	0,68
Referans	620.824,82	115.549,45	-	736.374,27	0,66
Yeni Mesaj	588.189,00	1.422,00	-	589.611,00	0,52
Bizim Gazete	509.334,00	-	-	509.334,00	0,45
Hürses	395.440,50	7.657,50	-	403.098,00	0,36
Gazete 34	375.235,00	18.608,66	-	393.843,66	0,35
Yeni Nesil	391.027,00	-	-	391.027,00	0,35
Son Saat	383.565,00	-	-	383.565,00	0,34
Tünaydın	379.918,00	-	-	379.918,00	0,34
Yenigün	379.057,00	-	-	379.057,00	0,34
Ayrıntılı Haber	378.454,30	-	-	378.454,30	0,34
H. ve Olaylara Tercüman	363.561,24	12.234,43	-	375.795,67	0,33
İstiklal	374.510,50	-	-	374.510,50	0,33
Yeni Devir	372.036,00	480	-	372.516,00	0,33
Son An	368.284,00	-	-	368.284,00	0,33
Magazines	-	613.231,40	-	613.231,40	0,55
General Overall	81.235.106,62	30.964.159,65	197.587,00	112.396.853,27	100,00

Source: Directorate-General of Press Advertisement (2010)



A large portion of the advertisement and announcement revenues of newspapers come from private ads. However, large groups are also dominant over this market, especially the Doğan Group, which makes it more difficult to survive in the market for newspapers that see gradually decreasing circulation and advertising revenues. As clearly seen in Table 12, most of the newspapers getting the largest share of advertisements are those newspapers belonging to large media groups. Looking at the list showing average daily sales figures of newspapers (Annex 2, where *Zaman* is at the top of the list), the surprising finding is that newspapers with the highest circulation and newspapers with the highest advertising share are not the same, or, in other words, that circulation numbers are not the only effective factor affecting advertising revenues. In the lists, there are five newspapers of the Doğan Group, two newspapers of the Çalık Group, and two newspapers of the Çukurova Group.

**Table 12: 20 Newspapers Receiving the Largest Advertisement Space for 2010**

PUBLICATION	CENTIMETRES
Hürriyet	6.873.100,50
Sabah	4.895.763,75
Posta	3.594.376,75
Yeni Asır	3.049.653,25
Milliyet	2.922.444,00
Zaman	2.421.133,75
Olay	1.898.675,25
Yeni Şafak	1.440.023,50
Vatan	1.357.367,50
Aksam	1.290.756,00
Star	1.265.378,25
Türkiye	1.095.219,50
Bugün	899.573,75
Cumhuriyet	817.886,75
Takvim	716.016,00
Milli Gazete	700.846,75
Radikal	682.635,50
Güneş	586.118,50
Vakit	577.747,75
Dünya	554.312,75

Source: The Nielsen Company (2010)

Table 12 demonstrates that although it is not the top circulating newspaper, there is a marked difference between the advertisement ratio received by *Hürriyet* and other newspapers. This situation is in parallel with the distribution of advertising revenues. Data on the distribution of advertising revenues by newspapers could not be accessed, due to these being considered trade secrets. However, looking at the circulation and advertisement shares, it becomes clear that the four large groups have a dominant position over almost the entire market (90%), and that the largest Group (Doğan Group) gets more than half its share of the pie. The Competition Authority also unanimously determined, in its decision of 5 April 2011 for which the reasoned decision has not yet been published, that the Doğan Group has a dominant position in the newspaper publishing market. It sentenced the Group to a pecuniary fine by determining (with a majority of votes) that the Group is abusing its dominant position with the discounts it offers in advertising sales and with the agreements it makes with media planning agencies.<sup>77</sup>

<sup>77</sup> Text: [http://www.rekabet.gov.tr/dosyalar/images/file/dogan\\_medya\\_karar.pdf](http://www.rekabet.gov.tr/dosyalar/images/file/dogan_medya_karar.pdf).

*In the distribution of advertising revenues the concentration rate is quite high, in contrast to circulation. To explain it with the HHI values that show the concentration rates of the market, the figure reached with the top four groups (3500) shows that the market has long since passed the upper concentration threshold (2500). In its current state, it is clear that newspaper publishing indicates an oligopolistic structure in the advertising revenues market.*

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Since there are no data on the breakdown of advertising revenues by newspapers, it is not possible to estimate the latest situation with regard to the breakdown, although it is obvious that the Doğan Group, which still holds its top advertisement-receiving newspapers (*Hürriyet*, *Posta*), maintains its dominant position in the market and therefore that the DK Journalism cannot lower the concentration rate in the advertising revenues market as it did in the newspaper sales market.

**Table 13: Concentration Levels in the Newspaper Advertisement Market (Groups)**

Groups	CR %	HHI
Doğan Group	54	2916
Turkuvaz Group	22	484
Ciner Group	8	64
Feza Journalism	6	36
Total	90	3500

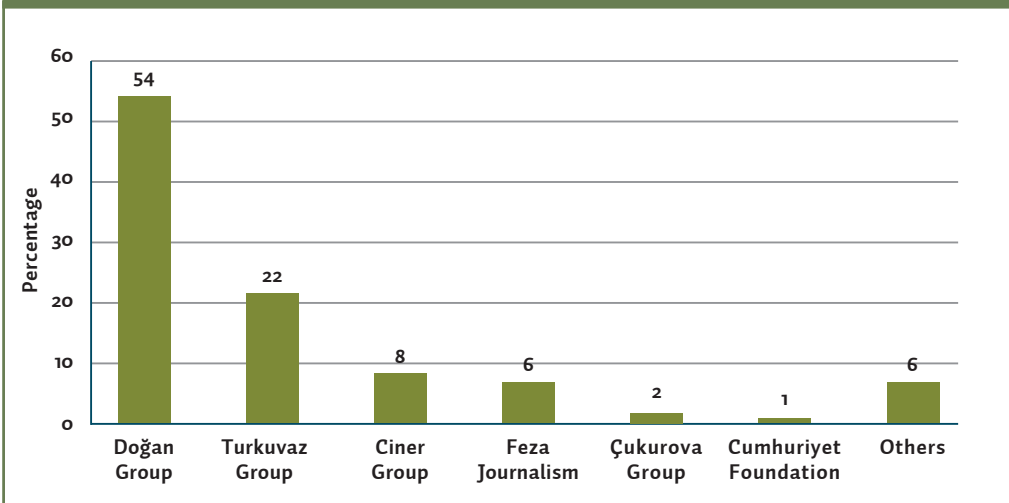
Source: ZenithOpitmedia (2010)

The Doğan and Turkuvaz media groups, which hold 76% of the newspaper market, also hold the entire newspaper distribution sector. Other than subscriptions, there are no distribution networks other than Doğan Publishing Holding's YAYSAT (believed to hold 64% of the market)<sup>78</sup> and Turkuvaz Distribution. To prevent abuse of this duopolistic structure, the distribution of periodical publications is regulated in article 23 of the Press Law. As expressed above, although not a common practice in Turkey, it is known that a few

As aforementioned, in the final phase of this study, the Doğan Group sold its two newspapers to DK Journalism and Publishing A.Ş.

<sup>78</sup> YAYSAT, <http://www.yaysat.com.tr/kurumsal/tarihce.html>.

**Chart 16: Distribution of Advertising Revenues by Newspapers**



Source: ZenithOpitmedia (2010)

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newspapers, like *Zaman*, also distribute through subscription. In the subscription-based distribution of newspapers and magazines, the largest enterprise is Cihan Media Distribution A.Ş., which distributes publications such as *Zaman*, *Bugün* newspaper and *Aksiyon* magazine. Stating that it distributes a monthly average of 500 million products, Cihan Media Distribution officials have disclosed that as the distribution fee, for example, they get TL1 in addition to the newspaper price from the readers of *Zaman*.<sup>79</sup>

### 5.2.2 Magazines

According to TURKSTAT 2009 Print Media Statistics, a total of 3469 magazines are published in Turkey, 1284 of which are local, 278 regional and 1907 national. The most widely sold magazines are those circulating nationwide (78%), followed by local (19%) and regional (3%) magazines. According to BYEGM data, the total number of magazines published is 2522.

#### Characteristics of Employees

According to SGK November 2010 data, there are currently 905 insured employees working in the magazines area in Turkey; 75% of them work in Istanbul with approximately 15% in Ankara-based publishing enterprises. Insured magazine employees in the public sector are quasi nonexistent.

When it comes to age distribution, the ratio of employees at and below 45 years of age is quite high; clearly the majority of employees in this subsector consist of the young. Looking at years of seniority, a picture emerges that is similar to other media channels, with 59% of magazine employees having less than five years of seniority. This is followed by 32% of

employees with 5 to 10 years of seniority; those with more than 10 years of seniority do not even reach 10%.

SGK data show that, in keeping with observations made in other media channels, the breakdown of men-women in the magazines publishing sector is almost equal. Yet, TURKSTAT's 2009 Print Media Statistics reveal a different picture. In the TURKSTAT Statistics, the number of employees in the magazine publishing area is considerably higher compared to SGK data (26,437).<sup>80</sup>

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*While women maintain their dominance in positions such as graphic designers, proofreaders, editors etc., in magazine publishing, unlike in the newspaper sector, women have found more opportunities in other cadres.*

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In TURKSTAT's data, there is a more balanced breakdown compared to newspapers (58% male to 42% female), yet the weight of men in executive positions in the magazine sector also draws attention. More than 50% of the female employees work under the "other personnel" category, which is accepted as the category for non-journalism-related activities. While women maintain their dominance in positions such as graphic designers, proofreaders, editors etc., in magazine publishing, unlike in the newspaper sector, women have found more opportunities in other cadres.

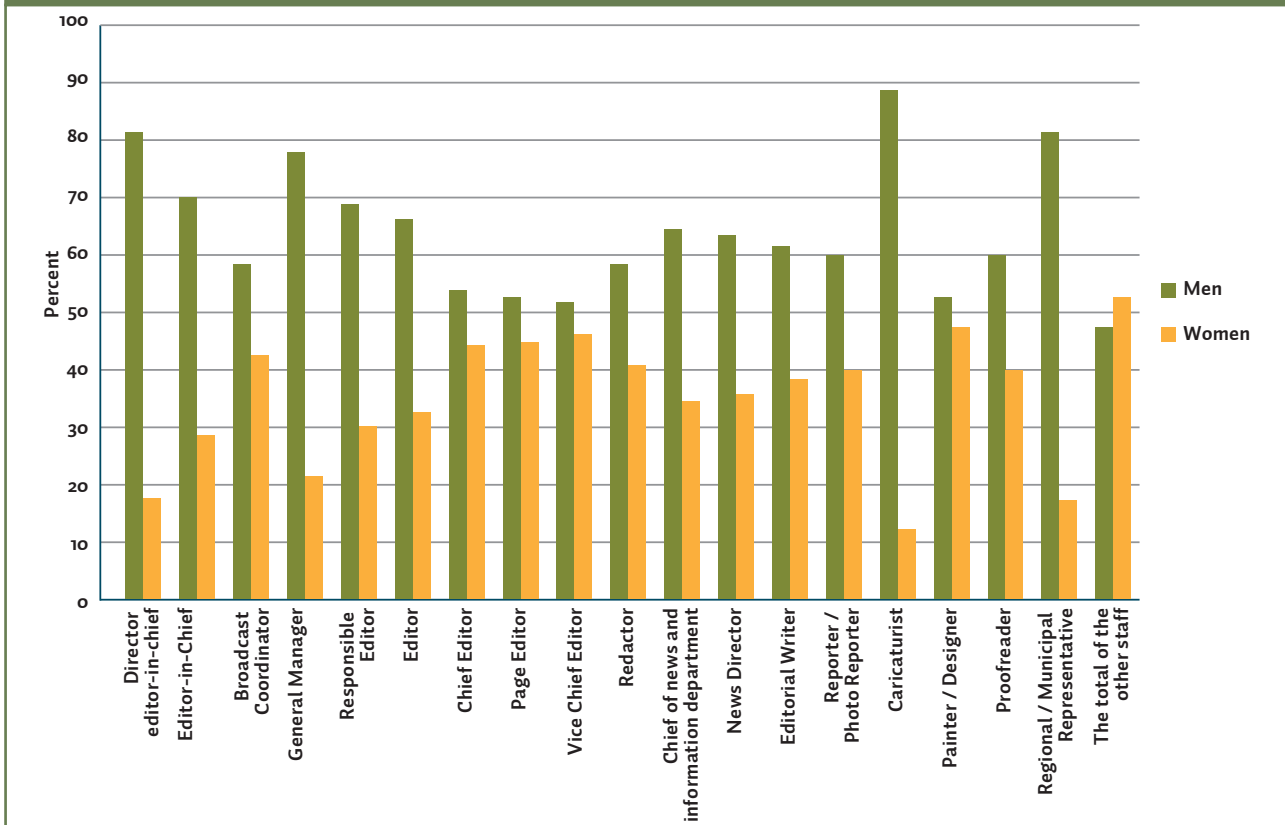
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<sup>80</sup> Many of the magazine groups issue multiple magazines with the same cadre in order to ensure economic efficiency. In the TURKSTAT data, employees working in each magazine have been evaluated separately. Hence there may be a high number of employees counted more than once.

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<sup>79</sup> Mehmet Tahsin, *Zaman* newspaper, interview via e-mail, 23.02.2011.

Chart 17: Distribution of Magazine Employees by Gender and Cadres



Source: TURKSTAT, Printed Media Statistics (2009)

### Circulation

In Turkey, magazine publishing saw its golden age between the 1960s and the mid 1980s. The most important reasons behind this golden age hinged on the new developments in printing techniques and that magazines acted as the voice of the opposition growing in the political environment of the time. For example, *Nokta* magazine, which created its own agenda and had a tremendous impact with its sensational news, reached a sales figure of over 100,000 by the mid 1980s. Starting with the 1990s, concentration also manifested itself in the magazines sector, and the magazine groups under the aegis of media groups made licence agreements with international sponsors to widen their product range. However, as the niche readership targeted by magazines began

to satisfy its needs through the Internet, and as newspapers began publishing weekend supplements that could supplant magazines in terms of competition, magazine circulation rates in Turkey began to drop. Although in 2006, especially in the news journals area, three large magazine groups increased their circulation by lowering prices, this attempt did not engender long-lasting results. Indeed, another study conducted by TESEV on this issue<sup>81</sup> reveals that the price reduction basically aimed at increasing advertising revenues rather than circulation numbers.

In this current period, we witness the gradual shrinkage of the magazine publishing area. In

81 Ceren Sözeri, 2006.

mid 2009, (May 2009) Ciner Group's five (*Empire, Rolling Stone, Seventeen, EGM, PC Magazine*), and Akşam Group's one (*Eve*) magazine said farewell to the market. In 2010, *Billboard*, published by Doğuş Group and the Akşam Magazine Group (except for *Alem* and *Platin* magazines), were closed down. In January 2011, six more magazines of the Ciner Group (*Newsweek, O.K, FHM, GEO, Mother&Baby, Food and Travel*) ended their publishing lives.

In Table 14, children's magazines, decoration and travel magazines come to the fore as top-selling magazines on a monthly basis; on a weekly basis, *Aksiyon* is the only magazine maintaining stable sales numbers in the area of news magazine publishing. Starting its publishing life in late 2008, *Newsweek* created excitement in the news magazine arena; yet, it could not save itself from being closed down in 2011. In magazine publishing, the highest degree of stability in sales numbers is seen in tabloid and economic magazines. The drop in magazine sales can be seen clearly in Table 14. This trend continued in 2010. However, since distribution companies were not willing to provide data on sales figures, and since BİK did not disclose the data due to its not having yet conducted the audits, the 2010 figures could not be accessed. Yet, as stated above, it should be borne in mind that the majority of magazines included in Table 14 that have survived despite the huge number of magazines closing down and that have the highest sale rates belong to media groups.

Circulation numbers of magazines are also affected by problems in distribution and sales points. Since the subscription system is not common, magazines turn towards the two

*Since the subscription system is not common, magazines turn towards the two distribution companies that belong to Doğan Group and Çalık Group. Doğan Group's Magazine Marketing Planning company distributes 747 national and 674 foreign magazines, and, according to their own calculations, hold 63% of the market. Çalık Group's Turkuvaz Distribution Marketing undertakes the distribution of 290 magazines and, again according to their own calculations, holds 41% of the market.*

**Table 14: Sales Numbers of Magazines**

MONTHLY MAGAZINES	2008	2009
	net sales	net sales
BEN 10		130,000
EVİM	62,383	61,855
ATLAS	49,219	44,785
NATIONAL GEOGRAPHIC	75,378	44,733
NTV TARİH		41,726
BURDA	41,111	40,174
NATIONAL GEOGRAPHIC KIDS	68,386	39,744
NTV BİLİM		32,222
SENİNLE	32,402	31,65
CHİP	32,663	30,496
COSMOPOLITAN	28,692	27,449
CNBC-E	26,498	26,282
BARBIE	26,865	25,471
LEZZET	22,671	23,865
GO GIRL	25,761	23,602
WEEKLY MAGAZINES	2008	2009
	net sales	net sales
AKSİYON	34,728	38,059
ALEM	10,158	9,636
EKONOMIST	8,353	9,632
AUTO SHOW	8,916	8,198
PARA	6,339	7,137
OTOHABER	7,521	7,118
ŞAMDAN PLUS	4,764	4,574
HAFTA SONU	6,584	4,566
OK	6,961	4,332
HELLO	4,004	4,004

Source: Mindshare (2010)

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distribution companies that belong to Doğan Group and Çalık Group. Doğan Group’s Magazine Marketing Planning company distributes 747 national and 674 foreign magazines, and, according to their own calculations, hold 63%<sup>82</sup> of the market. Çalık Group’s Turkuvaz Distribution Marketing undertakes the distribution of 290 magazines and, again according to their own calculations, holds 41%<sup>83</sup> of the market.

Nonetheless, the recent changes made by distribution companies in their terms and conditions of distribution services have put independent and small-sized magazine publishing enterprises in a particularly difficult position, consequently forcing them to leave the distribution network. This is because the distribution problem also involves a high number of returns due to low readership and insufficiency of sales points (on average, approximately 45% of magazines are returned)<sup>84</sup>, which increase distribution costs. This situation has led to direct contracts with specific bookstores in cities, especially by small enterprises.<sup>85</sup>

### Advertising Revenues and Distribution

Unlike newspapers, magazines are unable to benefit much from official advertising revenues. According to the 2010 official advertisement data of the Directorate General of Press Advertisement, the total share of all magazines from official advertisements is only 0.54%.

Yet, there are 85 magazines competing for a share in the private advertisements and

commercials pie.<sup>86</sup> As expressed above, magazine publishing is losing blood day by day, with the total share of magazines from advertising revenues also gradually dropping. As a result, magazines tend to close down due to their inability to meet costs, regardless of whether they are operating under large media groups or independently.

In Turkey, magazines getting the most advertisements are tabloid magazines, women’s magazines and economy-finance magazines. Most magazines other than the tabloid variety consist of licensed magazines. Among the most important reasons for this trend is the globalization of the advertisement sector, the content and know-how support provided by the licensors, and the opportunity to create a competitive advantage with an internationally known brand. Also, it should be borne in mind that the first foreign partnerships in the Turkish media sector were built in the magazine publishing segment, with the German *Burda RCS International GmbH* entering into partnership first in 1998 with Hürğüç and then, when the Doğan Group bought Hürğüç, with the Doğan Group, while during the same period Bilgin Group’s *Bir Numara Yayıncılık* and *Hearst* were also in partnership. The *Bir Numara-Hearst* partnership ended in 2003, while Doğan Burda (DB) continues its publishing life despite the withdrawal of *Rizzoli*. Other than these, *Vatan Dergi Grubu* (*Vatan Magazines Group*) which has the same ownership structure as *Vatan*, continued its existence as an independent magazine after the newspaper was bought by the Doğan Group, and, in 2006, partnered with *Imako*, a publisher operating in Greece. Today, the Group continues its publishing activities under the name *Mutlu Magazines Group* (MDG).

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82 Dergi Pazarlama Planlama, “Müşteri Portföyü ve Pazar Payı” <http://www.dpp.com.tr/?sWhatdo=Dpp&sLanguage=Tr&iSubUrlId=14061060>.

83 Turkuvaz Distribution Marketing, <http://www.tdp.com.tr/tr/services/dergi.asp>.

84 Ceren Sözeri, *ibid*, p. 110.

85 Nihat İlbeyoğlu, “Dergiler Dağıtım Şirketine İsyen Bayrağı Açtı”, [http://www.evrensel.net/v2/haber.php?haber\\_id=24729](http://www.evrensel.net/v2/haber.php?haber_id=24729) (06.02.2008).

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86 Sezay Erken, “Medya Büyüyor, Gazeteciler Azalıyor” [Media Rises, Journalists Fall], *Taraf* newspaper, (04.02.2011).

PUBLICATION NAME	Publishing Group	NUMBER OF PAGES
Alem	Çukurova	3,621.33
Hello	DB	3,291.00
Şamdan Plus	Turkuvaz	2,797.00
Marie Claire	Ciner	2,184.00
Elle	DB	2,096.00
Instyle	MDG	2,061.50
Maison Française	DB	2,060.00
Ekonomist	DB	1,836.25
Capital	DB	1,800.75
Cosmopolitan	Turkuvaz	1,680.50
Marketing Türkiye	Rota	1,598.50
Vogue Türkiye	Doğuş	1,574.00
Para	Turkuvaz	1,474.25
Bt Haber	Interpromedya	1,398.75
Naviga	Naviga	1,363.83
Harper's Bazaar	Turkuvaz	1,249.00
Tempo	DB	1,235.75
Home Art	Turkuvaz	1,122.50
Mediacat	Kapital Media	1,101.75
Hafta Sonu	DB	1,086.00

Source: The Nielsen Company (2010)

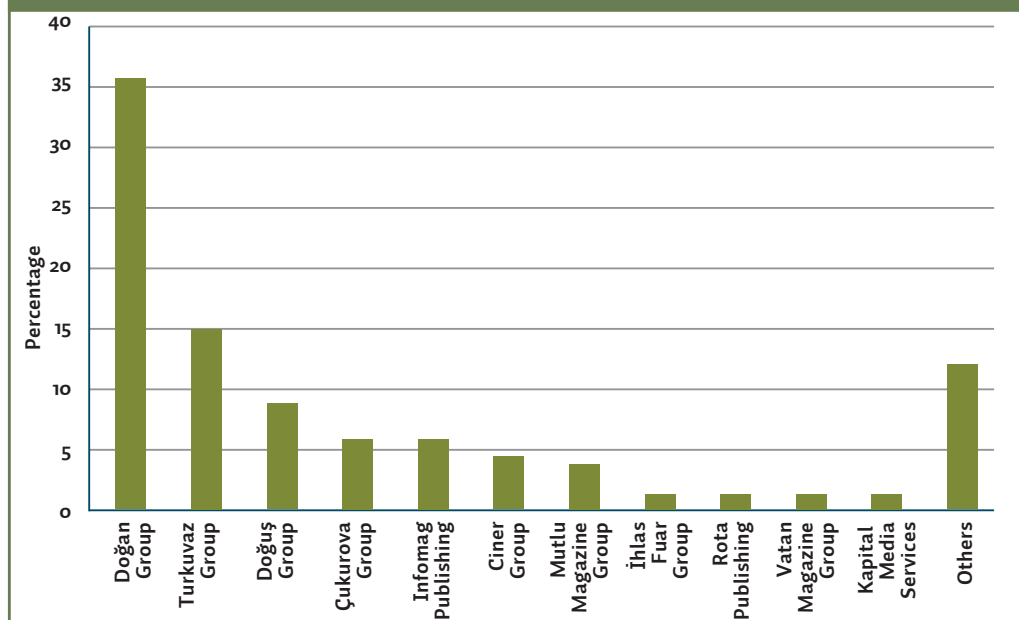
Table 15 shows that 16 of the top 20 ad-attracting magazines belong to the aforementioned large media groups. However, looking at the distribution of advertising revenues based on the market shares of these groups instead of on the number of ad pages, we see that there is less concentration compared to other media channels, and that medium-sized groups or small independent magazines are also able to find a place for themselves in this market. When we look at the top four groups on the basis of market shares and concentration rates, we can say that although the market share of Doğan Group is very high, the concentration rate is below the moderate level (a threshold of 1500).

**Table 16: Concentration Levels in the Magazine Advertisement Market (Groups)**

Groups	CR %	HHI
Doğan Group	36.6	1339.6
Turkuvaz Group	15.4	237.2
Doğuş Group	9.2	84.6
Çukurova Group	6.2	38.4
Total	67.4	1699.8

Source: ZenithOptimedia (2010)

**Chart 18: Distribution of Magazine Advertising Revenues**



Source: ZenithOptimedia (2010)

### 5.3. Radio Broadcasting

According to data from RTÜK, there are 35 national, 98 regional, 926 local and 50 satellite-broadcasting licensed radio stations in Turkey. The average time spent listening to the radio per person is 4.4 hours a week; 39% listen to the radio at home, 18% in the car and 8% in the workplace.<sup>87</sup> According to the metering conducted in June, July and August of 2010 by the KMG Turkey Metering System, with a concentration close to 20%, people listen to the radio mostly at noon/during lunch break and during rush-hour in the weekdays, while this ratio drops down to 10% on weekends. In radio broadcasting, a media channel that has been regularly metered for nearly 10 years, ratings are on the rise.<sup>88</sup> Additionally, although no metering or research has yet been seen on its effects, it is also clear that the Internet makes a positive contribution to the area of radio broadcasting by increasing ratings and offering additional channels (websites) for increased advertising revenues.

#### Characteristics of Employees

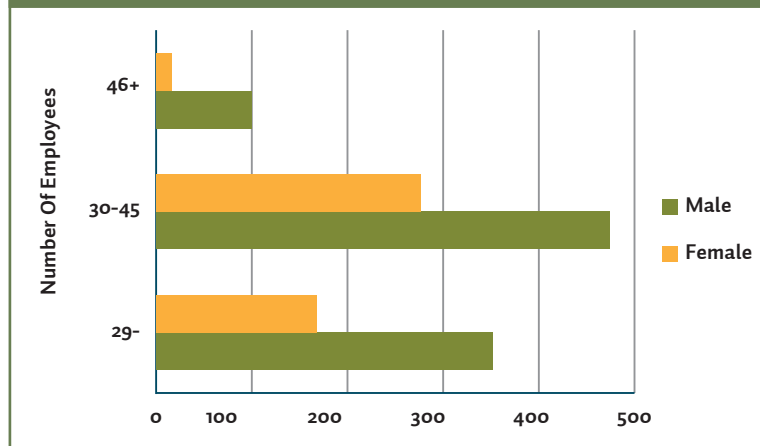
According to SGK data, there are 1402 insured employees in the business sectors of “radio broadcasting” and “sound recording and music publishing.” As in other media channels, more than 90% of the employees work in private companies. However, unlike in other media channels, the distribution of employees among provinces is more balanced. When it comes to the distribution of employees, Istanbul sits at the top with 34%, followed by Ankara with 20%, and Izmir with 5%. This wide distribution is probably due to the existence of a fair number of local radios and the regional radios of TRT.

87 Mindshare, “Media Scene January-September 2010.”

88 Expressed by RATEM Chairman at TESEV’s workshop on “Investment and Competition Relations in the Media Sector: Present and Future of the Sector” in Istanbul (21.04.2011).

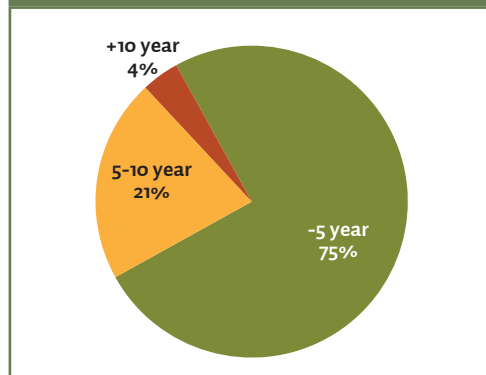
Looking at the age and gender distribution of employees, male employees have a marked dominance over female employees. Considering the widespread nature of radio broadcasting and the activities of local radio stations, this difference is interesting and requires further research. On the other hand, the low number of employees at or over middle age indicates that those working in the area of radio broadcasting consist of a younger population.

Chart 19: Distribution of Insured Employees in Radio Broadcasting by Age and Gender



Source: SGK data (November 2010)

Chart 20: Distribution of Insured Employees in Radio Broadcasting by Seniority



Source: SGK data (November 2010)



The presence of the insured young employee population shows itself in a striking way in the distribution as per years of seniority; 75% of those working in this sector have less than five years of seniority. The possibility that this may stem from the high employee turnover rate or informal employment rate in this sector should not be overlooked.

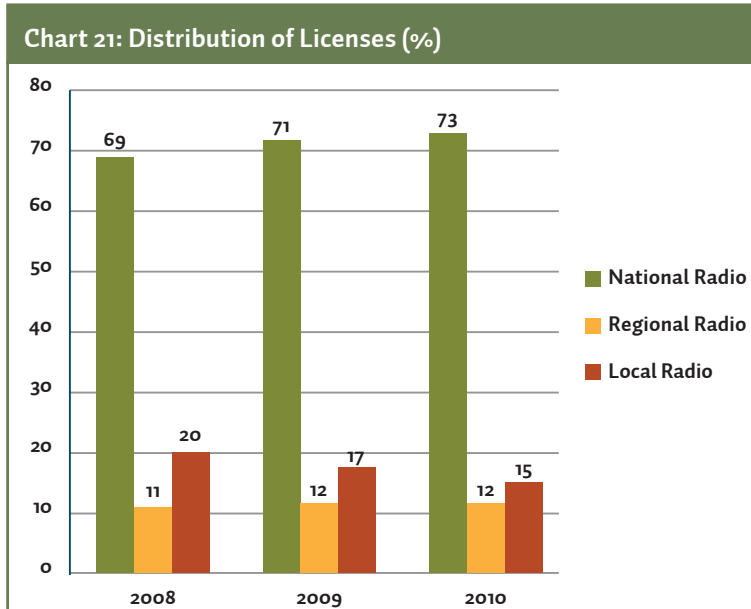
### Advertising Revenues and Their Distribution

Each of the five large media corporations in Turkey (Çalık, Doğan, Çukurova, Doğuş, Ciner) have radio stations. Other than these five corporations, companies such as Power Group, Spectrum Medya and Saran Group have an important share in radio broadcasting and advertising. Until 1990, i.e., until the privatization of radios, TRT was the only organization providing radio and TV broadcasting services. Today, it continues to broadcast on 12 stations.

Looking at the data from the Turkish Association of Advertising Agencies, although radio ratings are said to be increasing, radio advertisement shares have dropped in the last years with the weakening of its competitive-

*Although radio ratings are said to be increasing, radio advertisement shares have dropped in the last years with the weakening of its competitiveness against other media channels.*

ness against other media channels. Although it appeared to follow a stable course in recent years (TL79 million in 2008, TL74 million in



Source: RTÜK data (2008-2009-2010)

**Table 17: Radio Channels with the Highest Ratings**

RADIO CHANNEL	DURATION
Best Fm	4,961,101
Alem Fm	4,808,521
Marmara Fm	4,305,010
CNN Türk Radyo	4,205,923
Burç Fm	4,076,616
Radyo 7	4,018,947
TGRT Fm	4,000,773
Super Fm	3,966,202
NTV Fm	3,718,379
Slow Turk	3,569,587
Kral Fm	3,528,988
Moral Fm	3,524,744
Radyo D	3,455,512
Tatlises Fm	3,062,062
TRT Fm	3,058,712
Show Radyo	2,876,217
Radyo Spor	2,680,672
Radyo Viva	2,602,766
İstanbul Fm	2,557,101
Numberone Fm	2,390,029

Source: The Nielsen Company (2010)

2009 and TL78 million in the first 11 months of 2010),<sup>89</sup> the share of radio compared to other media channels is considerably lower.

When the breakdown of radio advertising revenues as per licence types is examined based on RTÜK data, what emerges is that the largest share belongs to radios broadcasting nationwide on terrestrial frequencies, just like the case of television broadcasting, and hence that,

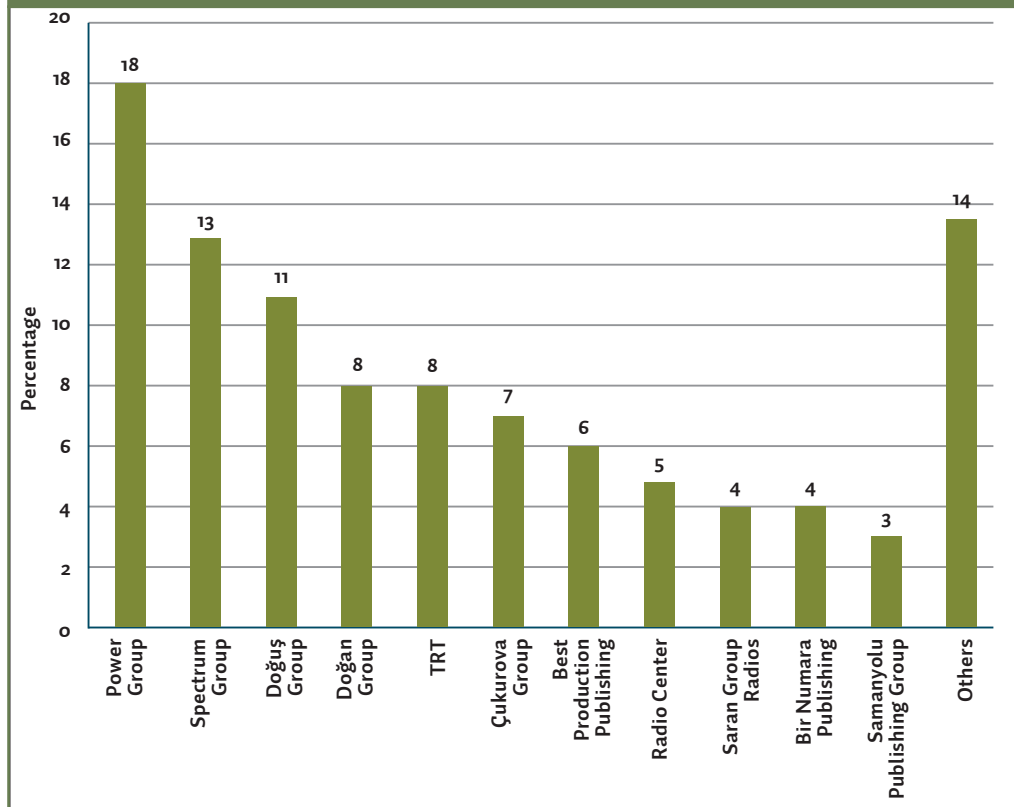
again as is the case with television broadcasting, resources are inefficiently distributed.

As in television broadcasting, revenues in radio broadcasting also consist of advertising and sponsorship expenditures. However, there is no consistency between radio enterprises getting the most advertisement based on a duration/second measurement and radio enterprises getting the biggest share from advertising revenues. This is due to the differences between unit prices, similar to the examples from other media channels. In other words, there is no parallelism between quantitative multitude and revenues, as seen in other media channels.

Looking at the distribution of advertising revenues among media groups, what emerges is that unlike in other media channels, groups operating only in the area of radio broadcast-

89 The data was obtained from the 2009 Advertisement Data and Radio Television Broadcasting Sector Report published in 2009 by the Radio and Television Broadcasters Professional Union (RATEM) and RTÜK data. The numbers look somewhat higher in the data from the Advertisers Association. The difference can be attributed to the data of the Advertisers Association being prepared using the tariff-based calculation method.

Chart 22: Distribution of Radio Advertising Revenues



Source: ZenithOptimedia (2010)

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*Looking at the distribution of advertising revenues among media groups, what emerges is that unlike in other media channels, groups operating only in the area of radio broadcasting receive a considerable share from the pie; in other words, large media groups do not have a dominant position in the radio broadcasting sector as they have in other media channels.*

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ing receive a considerable share from the pie; in other words, large media groups do not have a dominant position in the radio broadcasting sector as they have in other media channels.

In the distribution of advertisements, radio broadcasting once again reveals a picture where competitive conditions are more enabling with fewer entry barriers. Although this situation creates a positive perception in terms of radio broadcasting, considering the ratio of the share it gets from advertising revenues, it also gives the impression that radio broadcasting is a media channel ignored by large groups. It should be recalled that with Law no. 6112, commercial times for radio were also limited, as in television (rule of 20% per hour), and the introduction of this limit will necessarily affect advertising revenues. As suggested in the section on legal arrangements, it would be beneficial to subject radio broadcasting to a separate regulation, as radio broadcasting does not operate under the same conditions as TV broadcasting. In this sense, radio broad-

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*As suggested in the section on legal arrangements, it would be beneficial to subject radio broadcasting to a separate regulation, as radio broadcasting does not operate under the same conditions as TV broadcasting. In this sense, radio broadcasting should be given the support on regulations it needs, in consideration of distribution channels, area of effect and market conditions.*

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casting should be given the support on regulations it needs, in consideration of distribution channels, area of effect and market conditions.

Other groups that are as effective as the big media groups in the area of radio broadcasting are as follows:

### **Spectrum Media**

With four radio stations, namely *Süper FM*, *Metro FM*, *Joy Türk* and *Joy FM*, Spectrum Medya is an investment of the *Actera Group*, an independent private capital fund management corporation. Previously an affiliate of the Canada-based *Canwest Global Communication Corp.*, the Spectrum Radio Group was taken over by the *Actera Group* in 2009 with the withdrawal of *Canwest* from the Turkish market.

### **Power Group**

Including *Power FM*, *Power Türk*, *Power XL* and *Radyo Fenomen* under its roof, Power Group entered the sector with *Power FM*, which began broadcasting nationwide in 1992. Also owning television channels offering music content, Power Group has a significant share in the advertising revenues' pie.

### **Saran Group**

Operating since 1990 in various areas such as energy, defence, health and publishing, the group owns a total of four stations, namely *Radyo Spor*, *Radyo Tatlıses*, *Radyo Time* and *Radyo Pink*. Other than radio broadcasting, Saran Group also supplies content to national and local television. Holding the broadcasting rights for many international sports matches, the group is also engaged in marketing of foreign TV series and films in Turkey.

### **Bir Numara Yayıncılık**

In addition to two radio stations, *Number 1 FM* and *Radyo Klas*, Bir Numara Yayıncılık also owns two television channels: *Number One TV*

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and *Fashion One TV*. Starting its broadcasting life in 1992 with *Number 1 FM* from London and broadcasting via satellite for two years, *Number 1 FM* relocated to Istanbul in 1994. The tour, commercial sales and recording company rights of *Ministry of Sound*, one of the world's biggest entertainment clubs, are also held by *Number FM*.

### Best Production Publishing

Operates in the market with *Best FM*, owned by Emrah Hattat and is one of the first private radio channels in Turkey. *Best FM* broadcasts nationwide.

### Radio Center

With *Show Radyo*, *Radyo 5*, *Radyo Viva* and *Radyo Nostalji* in its portfolio, Radio Center was transferred to TMSF management with the confiscation of Erol Aksoy's media company in 2004. In 2006, Aksoy and TMSF came to an agreement and offered the media companies for sale. As a result of the disputes arising in the negotiation process, TMSF decided to continue with the sale. Of the radio stations, *Radyo 5* (Media Communication Services) was sold on 1 March 2011 to the Doğu Group, and *Radyo Viva* (Anatolia Radio Images Services) was put on sale with the tender process initiated on 8 February 2011, and *Show Radyo* (AKS Radio and Publishing) on 19 April 2011.

## 5.4 INTERNET PUBLISHING

The large groups in the media and finance sectors, such as Doğu Group, Çukurova Group, Doğan Group, Sabancı Group, Koç Group, İhlas Holding, İş Bankası, Rumeli Holding and Zorlu Group, were the first to invest in the Internet upon its launch for commercial operations. These groups entered the Internet sector by setting up companies through which they provided various online services, mainly as service providers. However, the crisis emerging towards late 2000 in the

Internet market, followed by the economic crisis of 2001, negatively affected investments in the Internet area.<sup>90</sup>

Internet journalism began in the same years as the big groups operating in the media sector carried their newspaper contents over to the Internet. Behind this course adopted by the large groups was the aim to expand Turkish content on the Internet and sell Internet connection, in addition to concerns that the Internet might gradually replace print media and television. Having a strong and organized presence on the Internet, the development of which could not be fully estimated in those first years, was also important for these groups in terms of their ambition to develop their product range, get a higher share from advertisements and dominate this new distribution channel.<sup>91</sup>

Internet usage in Turkey is increasing very rapidly. According to *Internet World Stats* data, there are 35 million Internet users in Turkey; this figure corresponds to roughly 45% of the population. According to the results of TURKSTAT's 2010 Household ICT Usage Survey, 41.6% of households have access to the Internet. According to the same survey, individuals connecting to the Internet in the January-March 2010 period mostly used it to send e-mails (72.8%), log in to chat rooms and social networks (64.2%), read news/newspapers/magazines (58.8%), get information on goods and services (55.7%), and download and play games, music, film, images (51.2%). These figures indicate that the importance of the Internet in access to communication and media is rapidly increasing.

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90 Aylin Aydoğan, 2005.

91 Tolga Çevikel, "Türkçe Haber Siteleri ve Türkiye'de İnternet Gazeteciliğinin Gelişimini Sınırlayan Faktörler" Galatasaray Üniversitesi İletişim Fakültesi Hakemli Akademik Yayını, İleti-s-im., 2004, p. 152.

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## Characteristics of Employees

According to SGK 2010 November data, there are 475 individuals employed in web portals in Turkey. This shows that there are very few formal (registered) employees in this sector; 60% of them work in companies operating in Istanbul, followed by Ankara with 20% of employees.

A vast majority (62%) of employees working in Internet publishing, which is a new outlet, consists of workers 29 years of age or under. The number of male employees (55%) is higher than females (45%).

Those working in the journalism segment of the Internet publishing area, which is a subsector of the media sector, face significant problems concerning their working conditions. Journalists and editors working in the area of Internet publishing are more vulnerable than their colleagues working in traditional media outlets. Frequent problems associated with the traditional media, such as employees without insurance or earning low wages or no remuneration, are more common in the area of Internet publishing.<sup>92</sup> Journalists working in Internet publishing are also excluded from legal arrangements such as those governing the Press Law and the Regulation on Press Cards; hence, they cannot get Press Cards and receive accreditation<sup>93</sup> issues in information exchanges with state institutions, especially the TGNA and Prime Ministry. Officials of the Directorate General of Press Advertisement and Directorate General of Press and Information insisted that work is underway through

legal arrangements to resolve these issues.<sup>94</sup>

## Characteristics of the Internet Infrastructure and Organizations Providing Infrastructure

In Turkey and in the world at large, access to wideband Internet is increasing in importance in the Internet infrastructure. As such, the quality and subscriber numbers for wideband have become development criterion. The primary platform used for wideband access services in Turkey is a copper cable network, followed by mobile wideband Internet. The Cable TV platform, satellites and fibre are also used at limited levels for Internet access.<sup>95</sup>

Looking at subscription types, the picture that emerges is that in the second half of 2010, nearly 84.8% of the users gained access to the Internet through a DSL connection. This is followed by mobile subscriptions with 10.9%, cable with 2.5% and fibre connection subscriptions with a share of 1.3%. A large majority of DSL subscriptions are with Türk Telekom, which is the single fixed telephone operator in Turkey and which owns the infrastructure for all distribution networks, all telephone exchanges and transmission channels, therefore controlling the entire infrastructure. Türk Telekom's TTNET has had a market share of 76.8% in wideband Internet access services as of 2010 June.<sup>96</sup>

Being the only fixed telephone operator and holding the entire infrastructure, Türk Telekom appears to dominate the Internet access market using these advantages. Türk Telekom's

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92 "İnternet Gazeteciliği Masaya Yatırıldı", [http://www.habervitrini.com/internet\\_gazeteciligi\\_masaya\\_yatirildi-486921.html](http://www.habervitrini.com/internet_gazeteciligi_masaya_yatirildi-486921.html) (24.09.2010).

93 Accreditation: approval given by relevant authorities allowing journalists to follow news in public agencies.

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94 "İnternet haber editörleri sarı basın kartı alacak", [http://www.netgazete.com/News/755995/internet\\_haber\\_editorleri\\_sari\\_basin\\_karti\\_alacak.aspx](http://www.netgazete.com/News/755995/internet_haber_editorleri_sari_basin_karti_alacak.aspx) (25.01.2011).

95 Güngör, Müberrra et al, 2010, p. 51.

96 *Ibid*, p. 53.

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significant competitive advantages compared to other companies indicate that the Internet access market is a problematic area in terms of competition. Moreover, critiques also note that Türk Telekom, occasionally uses these advantages to create favourable circumstances for itself and that there is insufficient competition supervision in the market.<sup>97</sup> In addition to its advantages in infrastructure and Internet access, Türk Telekom also holds a share in the mobile communications market, as will be addressed later, and serves as a content provider. Considering that the media sector is progressively shifting towards the area of new technologies, it appears that Türk Telekom has transformed itself into one of the big players of the sector, and, considering the advantages it has, this situation can have unhealthy consequences in terms of competition in the near future.

Problems caused by the competitive advantages of Türk Telekom have also occasionally been carried to the agenda of the Competition Authority. Officials of the Competition Authority have expressed that they can only make decisions within the framework of the existing legislation, and that social support is needed for more effective competition regulations.<sup>98</sup>

## Organizations Engaged in Internet Publishing

As stated above, big capital groups, including big media groups, were the first to make substantial investments in Internet publishing in Turkey. Internet journalism was also started by the big media groups carrying their newspa-

pers over to the Internet after 1996. Subsequently, news sites operating only on the Internet have emerged.<sup>99</sup>

Today, there are many publications on the Internet that are part of the publications known in the traditional media channels or that only operate on this channel. Also, “blogs,” which can be described as Internet diaries, are becoming important actors in Internet journalism.

The metering done by IAB Türkiye (*Interactive Advertising Bureau*), an interactive advertisement platform established in 2007 with 10 million Internet users (*real users*),<sup>100</sup> showed that although the rankings change from time to time, on a monthly basis in 2010 most websites visited were *portals*, *blog* service providers and video sharing sites. Table 18 and Annex 3 also show that newspapers of big groups are among the most followed news sites. Although at first glance this may give the impression that Internet media is similar to traditional media and that the dominion of former actors continues in this new forum, “*blogcu.com*,” a social networking site that is host to many news blogs, gives a different read on the results. The success of social media and vertical *portals* gives an idea about wider social media services not measured by the IAB, as well as the access to search engines including news sites, and the trends in the Internet media.

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97 Erol Katırcıoğlu, “Mümkünlü Mümkün mü?” (02.12.2010).

98 TESEV’s workshop “Investment and Competition Relations in the Media Sector: Present and Future of the Sector” Istanbul (21.04.2011).

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99 Tolga Çevikel, *ibid*, p. 151.

100 A survey company called Ölçümler Gemius conducts the metering. For details, please see: Annex 3 and <http://www.iab-turkiye.org/arastirma-raporlari.php>.

Table 18: Top 10 Sites Visited by Real Users in 2010

Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept	Oct	Nov	Dec
blogcu.com	blogcu.Com	blogcu.com	blogcu.com	blogcu.com	izlesene.com	mynet.Com	mynet.com	mynet.com	blogcu.com	mynet.com	mynet.Com
mynet.com	mynet.Com	mynet.com	mynet.com	mynet.com	mynet.com	izlesene.com	blogcu.com	blogcu.com	mynet.com	izlesene.com	Daily motion.com.tr
izlesene.com	izlesene.Com	izlesene.com	izlesene.com	izlesene.com	blogcu.com	blogcu.Com	izlesene.com	izlesene.com	dailymotion.com.tr	blogcu.com	izlesene.com
hurriyet.com.tr	hurriyet.com.tr	ekolay.net	ekolay.net	hurriyet.com.tr	hurriyet.com.tr	hurriyet.com.tr	hurriyet.com.tr	hurriyet.com.tr	hurriyet.com.tr	dailymotion.com.tr	blogcu.Com
milliyet.com.tr	milliyet.com.tr	hurriyet.com.tr	hurriyet.com.tr	milliyet.com.tr	milliyet.com.tr	milliyet.com.tr	milliyet.com.tr	milliyet.com.tr	milliyet.com.tr	hurriyet.com.tr	hurriyet.com.tr
gazetevatan.com	ekolay.Net	milliyet.com.tr	milliyet.com.tr	ekolay.net	ekolay.net	ekolay.Net	gittigidiyor.com	gittigidiyor.com	gittigidiyor.com	milliyet.com.tr	milliyet.com.tr
ekolay.net	gazetevatan.com	antoloji.com	kraloyun.com	haberler.com	kraloyun.com	gittigidiyor.Com	haberturk.com	vidivodo.com	vidivodo.com	gittigidiyor.com	gittigidiyor.Com
kraloyun.com	kraloyun.com	kraloyun.com	haberler.com	kraloyun.com	haberturk.com	kraloyun.com	kraloyun.com	haberturk.com	haberturk.com	vidivodo.com	vidivodo.com
sabah.com.tr	hepsiburada.com	haberler.com	antoloji.com	sozluk.sourtimes.org	haberler.com	haberler.com	ekolay.net	haberler.com	haberler.com	haberturk.com	timsah.Com
hepsiburada.com	antoloji.Com	sabah.com.tr	sabah.com.tr	haberturk.com	sabah.com.tr	haberturk.com	haberler.com	kraloyun.com	timsah.com	ekolay.net	haberturk.com

Source: IAB Türkiye, (2010)

### Internet Advertising Revenues and Their Distribution

The main source of revenue for the Internet publishing segment in Turkey is from advertising. Before addressing advertising revenues and their distribution, it might be useful to describe Internet advertising and what it covers.

Internet ads are divided into four groups:

- Display ads (banner ads, pop-up window ads),
- Search engine-based ads (ads measured by click-through rates),
- Classified ads (ads offering by online shopping or ads on ad-publishing sites),
- E-mail ads.

Internet advertising holds a very small share compared to traditional media, yet shows very rapid development in a very short time. According to IAB Europe Adex reports, Internet ads brought in EUR16.8 billion in the US and EUR13.2 billion in Europe in 2008. These

numbers dropped in 2009 due to the crisis to EUR16.3 billion in the US while going up to EUR14.7 billion in Europe. Internet ads reach over 25% of total advertisement investments in developed European countries such as the UK, Denmark etc, while they are still under 10% in Turkey despite the rapid developments.<sup>101</sup> When examined on the basis of numbers, in 2009 Internet advertising revenues in Turkey were TL182 million according to the data from the Advertisers' Association, and EUR120 million according to the IAB Europe Adex Report.

In the area of Internet publishing, many and different players seek earning revenue from the already small advertising pie. Additionally, although not included in the metering, it was

<sup>101</sup> This figure is 6.5% according to data from the Turkish Association of Advertising Agency and 9.2% according to data from IAB Europe Adex 2009. This discrepancy most likely stems from whether or not the whole range of Internet ad types is included. All types are included in IAB reports.



expressed verbally that the search engine *Google* gets a share of approximately 45% from Internet advertising revenues in Turkey, as it does in most other countries, followed by *MSN*—which is excluded in the metering—with a share of 10-20% and the social networking site *FACEBOOK*, which has approximately 23 million users in Turkey, with a share of roughly 5-10%.<sup>102</sup>

According to IAB Reports, Internet publishing companies in Turkey have adopted three distinct business models: direct ad sales, ad sales through their associated holdings, and ad sales on the Internet through advertisement planning companies. The most successful company adopting ad sales through a team it has established is the “*mynet.com*” portal. Among successful examples of the second business model are newspapers’ websites. Some organizations earn advertising revenue through companies selling multimedia, called network. The largest such network is *Medyanet* established under Doğan Publication Holding, followed by companies such as *Netbook*, *ReklamZ*, *MedyaGuru*, *ComMedya* and so on.

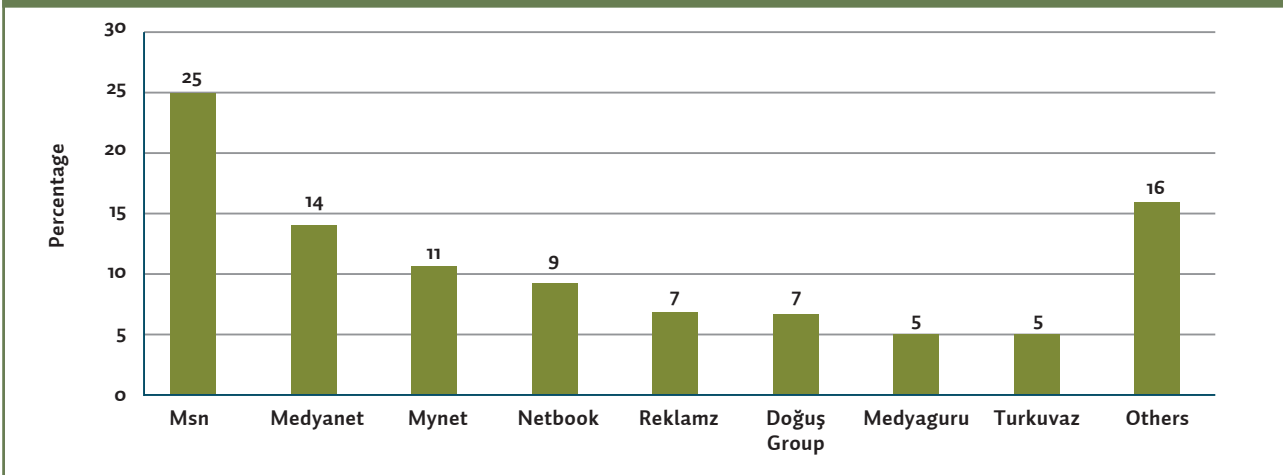
<sup>102</sup> Interview with Uğur Şeker, General Manager of *Dijital Büro İstanbul* and founding member of *IAB Türkiye*, 02.02.2011.

In the internet publishing market, while some sites are responsible for their own ad sales, large media groups strive to become dominant in the advertisement market outside of search engines and social networks. The number of page views shows that a significant portion of the market is shared among media groups and networks (Annex 3).

Another matter that should be addressed here with regard to internet advertising revenues and their distribution is the war waged by the government against international giants such as *Google*, which holds a large section of total advertising revenues. While the Ministry of Transportation criticizes *Google* and *Youtube* for not paying taxes although they do not localize their content and do not earn any significant advertising revenue, the Ministry of Finance has asked *Google* to pay a tax fine of TL30 million. *Google*’s representative, *Google Advertising Marketing Ltd. Şti.*, has taken the matter to court.<sup>103</sup>

<sup>103</sup> “*Google Türkiye’yi yok sayıyor, vergi vermek istemiyor*” <http://ekonomi.haberturk.com/teknoloji/haber/520970-google-turkiyeyi-yok-sayiyor-vergi-vermek-istemiyor> (06.06.2010).

Chart 23: Distribution of Online Advertising Revenues



Source: ZenithOptimedia (2010)

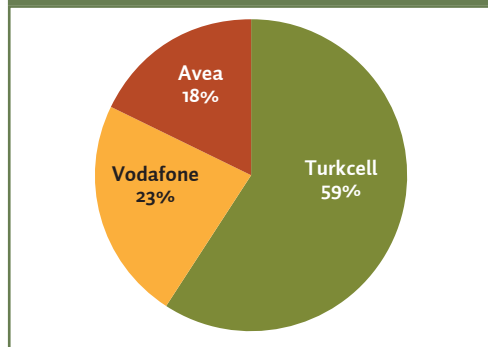


## 5.5. MOBILE PUBLISHING

Mobile publishing, the newest sector in the media, started in the 2000s and secured increased access following the conclusion of the 3G license tender in 2009. The GSM operators starting operation in 1998 have 61.5 million subscribers as of June 2010; 11.4 million of them are 3G subscribers.

The mobile communication area in Turkey is shared among three operators holding 3G licences. The oldest, TURKCELL, was launched in 1998, while VODAFONE entered the market by buying TELSİM in 2005. AVEA was formed through the merger of the AYCELL, GSM of Türk Telekom, *Telecom Italia Mobile*, and İŞ Bankası. As a result of the tender opened by the Privatization Administration, in 2004, 55% of Türk Telekom was sold to Öger Telecom, after which *Telecom Italia Mobile* assigned its 40% shares in İŞ-Tim to Türk Telekom in 2006. Among the operators receiving their 3G licenses together with number portability authorization in 2009, TURKCELL received the highest market share.

Chart 24: Market Shares of GSM Operators



Source: BTK (2010)

These operators earn a significant part of their revenues from telephone calls (83%), followed by short messaging services (SMS) with 8%, value added services including mobile publishing (6%) and data transfer (3%).

Within the scope of value added services, mobile publishing first started with short messaging services. Operators started information/news transmission through SMS as of 2002, and then began working together with media groups in order to be able to offer this service. Right after the 2001 crisis, media groups began earning revenue at a very small cost from an area they had never expected.

Today, in almost all media groups, there are separate dedicated departments for new media, interactive publishing, digital publishing and business development, and mobile publishing subunits under them. Although Internet is the priority of these units, in which around 30-40 employees work on average, there are only 5-6 employees working in mobile media subunits. People working in these units are usually graduates of communication faculties or transfers from the IT sector.

### Advertising Revenues and Their Distribution

Actors of the mobile segment included under the scope of this study are the content-providing companies. These may be media groups offering short messages for news, information and sports, and mobile television content through 3G packages, or companies offering music listening/downloading or wallpaper services, which are among the most popular contents for mobile.

As with the Internet, expectations from the model based on user revenue seems limited in the mobile segment, and it is hoped that the real revenue will come from advertising.

Mobile advertising revenues, which are rapidly growing in the world (\$1.4 billion in 2007, \$2.7 billion in 2008) are as yet very small in Turkey. Revenues earned from mobile advertisements are as follows:

- Mobile display ads (wap, mobile Internet, iPhone applications): approximately TL2 million,
- Sponsorship spaces (ads to infotainment<sup>104</sup> media SMS, MMS,<sup>105</sup> video-based free but subscription-based content services): around TL3.5 million,
- Ads published only through authorized databases: TL11-12 million.

The revenues, with a total amounting up to TL17-18 million, reach TL30-35 million when SMS (one-way SMS, internal usage by operators, SMS campaigns giving as a gift the products that are the subject of an ad) are added.<sup>106</sup>

Looking at the distribution of these advertising revenues, the biggest share goes to GSM operators, who provide infrastructure services and who are, in a sense, accepted as channel owners. The remaining share is divided between technology supporters and content providers. Roughly 50% of the advertising revenues go to the GSM operator, 35-40% to content providers and approximately 10-15% to tech supporters.

It is generally accepted that in 2010, content providers earned a total of TL5.5 million in advertising revenues from this channel, yet considering that some of these providers have set up their own technology supporters, it is possible to say that content providers have

earned net TL1.5-1.75 million in advertising revenues.<sup>107</sup>

The high number of players in the mobile advertising market, which is expected to reach 10 billion dollars in 2013 worldwide and which also sees rapid growth in Turkey, has increased competition and brought on the agenda the possibility of strategic cooperation. Similar to content providers setting up their own tech support units, operators are also turning towards establishing their own content providers. For example, Türk Telekom operates concomitantly in the Internet service provider market, the GSM market (Türk Telekom has 81% shares in AVEA) and content providers market. While this situation is criticised with regard to competition equality, other operators are also turning towards cooperation opportunities, especially in the content area. TURKCELL has collaborated with FIZY.COM, the music search engine that was closed down after problems with the Turkish Phonographic Industry Society (MÜYAP) due to copyright infringements, thereby enabling "FIZY.COM" to continue its online publishing activities, while also finding an opportunity to invest in the constantly growing field of digital music platforms.<sup>108</sup>

<sup>104</sup> Infotainment: informing while entertaining. The term is derived from the combination of the words "information" and "entertainment."

<sup>105</sup> MMS (Multimedia Messaging Services): a messaging system that offers users the opportunity to combine melodies, graphics, text and images in messages.

<sup>106</sup> Kurt Onur, General Manager, *Move Mobile Media Agency*, interview through e-mail, 09.02.2011.

<sup>107</sup> Interview with Kurt Onur.

<sup>108</sup> "Fizy'yi TURKCELL kurtardı" [TURKCELL Saved FIZY], <http://www.ntvmsnbc.com/id/25176641/> (30.01.2007).







# Secondary Sectors Affecting the Media Sector

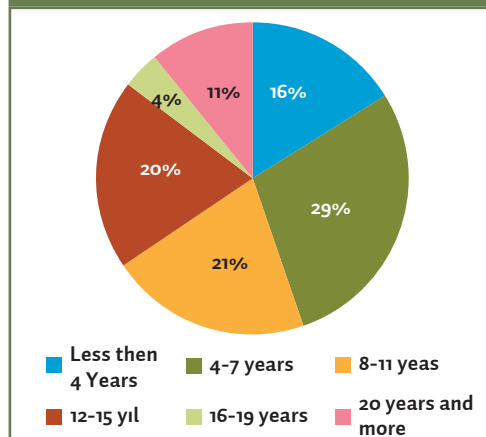
## 6.1. ADVERTISING

Advertising is one of the most important sources ensuring the survivability and continuity of the media sector. The size of virtually every channel in the media sector is determined based on the share it receives from advertising revenues; hence, the relationships between advertisers, advertising agencies and large media companies is an area that needs to be examined and discussed. The advertising sector encompasses the advertisers (clients), advertising agencies, media agencies, advertising channels and producers taking part in the production of advertisements. According to data from the Turkish Association of Advertising Agencies, the advertising sector in Turkey consists of almost 100 institutionalized corporations, including advertising agencies and media planning agencies, in addition to approximately 30 producer companies.

### Characteristics of Employees

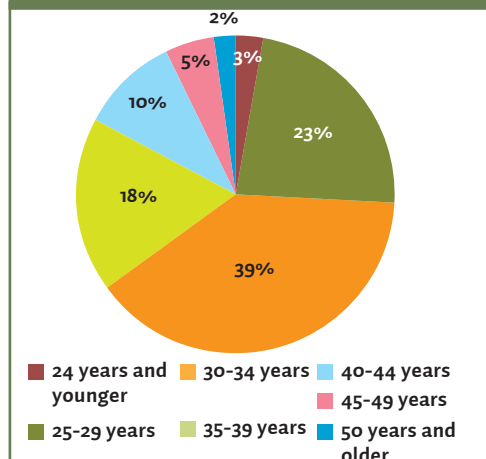
Results of Nielsen's 2010 Ad Creators Profile Survey contributes to building perspective on the sector, although it does not cover all of its employees. In this context, according to the survey on 190 advertisement creators (creative directors, strategists, ad copywriters, art directors), 28.9% of those employed in the advertising sector have a seniority of 4 to 7 years. Contrary to common assumptions, the average age of employees in the sector is not low, with 38.9% of employees in the 30-34 age range constituting the largest group.

Chart 25: Distribution of Advertising Sector Employees by Seniority



Source: Mediacat (January 2010)

Chart 26: Distribution of Advertising Sector Employees by Age

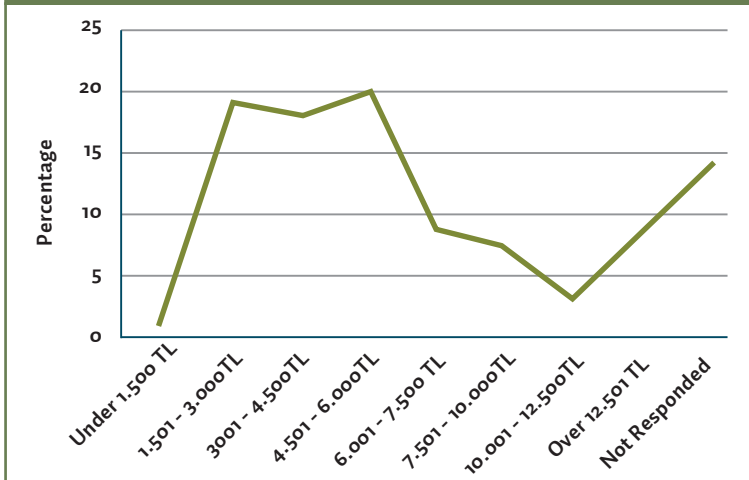


Source: Mediacat (January 2010)

The respondents' income levels reveal that 38% receive a salary of between TL4500-6000, while 36% receive TL1500-3000, followed by

33% earning TL3000-4500. Comparing the data in Chart 27 to the data on the wage distribution of media employees in Chart 6 shows that although they have similar educational backgrounds (considering that both professions require graduation from communications faculties), journalists work under a heavier wage pressure and their wage distribution is more imbalanced. It should not be overlooked that these working conditions against the interests of journalists are also against the profession of journalism, and that the shift of a quality workforce from journalism to other sectors in the same field will likely affect content.

**Chart 27: Distribution of Income for Advertising-Sector Employees**



Source: Mediacat (January 2010)

### Advertising Agencies

In Turkey, the advertising sector has begun developing parallel to the industrialization of the media sector, and the transition to colour TV broadcasting in 1984 has caused advertisement to undergo a structural change. However, the actual development in that period was the investments launched in Turkey by multinational advertising giants and the rapid globalization of the advertising sector.

In 1985, *Cenajans* signed a partnership agreement with US *Grey Advertising*; in the same year, *Pars Reklam* established partnership with *McCann Erickson*, and *Güzel Sanatlar Reklamcılık* with *Saatchi&Saatchi*. Later, in 1986, *Charta Lintas* merged with *Manajans Thomson*; *Markom* partnered in 1987 with *Leo Burnett* and changed its name to *Markom/Leo Burnett*. Subsequently, in 1997, *Klan Reklam* partnered with *Euro RSCG* and began operating under the name *Klan Euro RSCG*.<sup>109</sup> *Alice Reklam*, founded in 1989, entered into partnership with *BBDO* in 1991 and transformed into *Alice BBDO*.

International agencies, preferring in emerging markets to initially establish partnerships with local agencies that knew the market, either increased their partnership percentages in the ensuing years or bought out the agencies. In the 1990s, the continuing privatisations in the area of communication, along with globalization, accelerated the incorporation process. While internationally famous brands aimed at controlling their strategies and budgets at the local level through global agencies from which they supplied services, local brands sought to benefit from the know-how support provided by international brands. This situation narrowed the living space of agencies with no foreign partners and small-sized agencies not based in Istanbul.

Today, almost all of the advertising and media planning agencies operating in Turkey are engaged in international advertising networks. According to the “*Agency Report 2010 Index*”<sup>110</sup> by the *Advertising Age* magazine, the top four groups in the ranking list of the largest advertising groups of the world and their companies operating in Turkey are as follows:

<sup>109</sup> Nurhan Tosun, 1989, p. 70-102.

<sup>110</sup> Advertising Age, “Agency Report 2010 Index,” <http://adage.com/article/datacenter-agencies/agency-report-2010-index/14295>.

**Table 19: Global Advertising Networks / Advertising and Media Planning Agencies Present in Turkey**

GROUP	WPP Group	OMNICON Group	PUBLICIS Group	INTERPUBLIC Group of Cos.
Worldwide revenue (USD)	13.6 Billion	11.7 Billion	6.3 Billion	6 Billion
Advertising Agencies	<b>Young &amp; Rubicam Group</b> Young & Rubicam Wunderman	<b>DDB Worldwide Communication Group</b> DDB Worldwide	Publicis	<b>McCann World Group</b> McCann Erickson Worldwide
	<b>Ogilvy &amp; Mather</b> OgilvyOne Worldwide Ogilvy & Mather Advertising	<b>BBDO Worldwide</b> BBDO Worldwide Proximity Worldwide	Leo Burnett Worldwide	<b>Lowe &amp; Partners</b> Lowe Ajans
	<b>JWT</b> J.Walter Thompson Advertising	<b>TBWA Worldwide</b> TBWA Worldwide Tequila	Saatchi&Saatchi	
	<b>Grey Grup</b> Grey Ajans			
Turkey	Young&Rubicam İstanbul Wunderman Istanbul	Medina Turgul DDB DDB&Co.	Publicis Bold	McCann Erickson Istanbul
	Ogilvy Türkiye	Alice BBDO	Leo Burnett İstanbul	Lowe Istanbul
	Manajans / JWT	TBWA / Istanbul	Güzel Sanatlar Saatchi & Saatchi	
	Grey Istanbul			
Media Planning Agencies	<b>Grup M</b> Mindshare Mec MediaCom Grup M Search Maxus	<b>OMNICON Media Group</b> OMD World Wide	<b>ZenithOptimedia</b> Zenith Media <b>Starcom Mediavest Grup</b>	Universal McCann
Turkey	Mindshare Istanbul Mec Active Engagement Mediacom Istanbul Grup M Türkiye Maxus Medya	OMD Istanbul	Zenith Medya Starcom Mediavest Türkiye	Universal McCann Istanbul

Source: Advertising Age, "Agency Family Trees 2010, Agency Report 2010 Index"<sup>111</sup>

<sup>111</sup> The original source can be found at <http://adage.com/article/datacenter-agencies/agency-report-2010-index/14295>. In the original source, each agency included under the groups is listed, while the table shows the advertising and media planning agencies operating in Turkey.



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Today, there are approximately 100 advertising agencies offering full service with customer relations, creative and media planning departments, where 85 of them are members of the Turkish Association of Advertising Agencies. According to data obtained from the Advertisers' Association, of these member agencies, 2 were established before 1960 and 52 after 1980. It is estimated that roughly 3000 people work in advertising agencies.

According to the results obtained by calculations based on tariff prices of advertisements made for television, newspaper, magazines and radio in 2010, the 10 largest advertising agencies (eight affiliated with international groups) are as follows, in descending order:<sup>112</sup>

1. Alametifarika
2. TBWA /ISTANBUL
3. Team Red
4. Güzel Sanatlar Saatchi&Saatchi
5. Medina Turgul DDB
6. Publicis Yorum
7. Leo Burnett
8. McCann-Erickson
9. Euro RSCG Istanbul
10. Y&R Reklamevi

### Media Planning Agencies

Media planning agencies, which act as a bridge between advertisers and the media, execute the planning of which advertisement message will be published through which channel and at what frequency, also taking into consideration the demands of advertisers, and maintain the relationship established by the advertiser with the media. Media planning agencies carry out tasks such as creating the right budget, assessing the market, determining media

targets, identifying the target audience and media choices, and creating the media mix; their role in the sector has gained more importance with the media channels becoming more diverse and complex. Parallel to the developments taking place in the advertising sector, media planning agencies, of which there were not even five in the early 2000s, have today reached almost twenty in number.

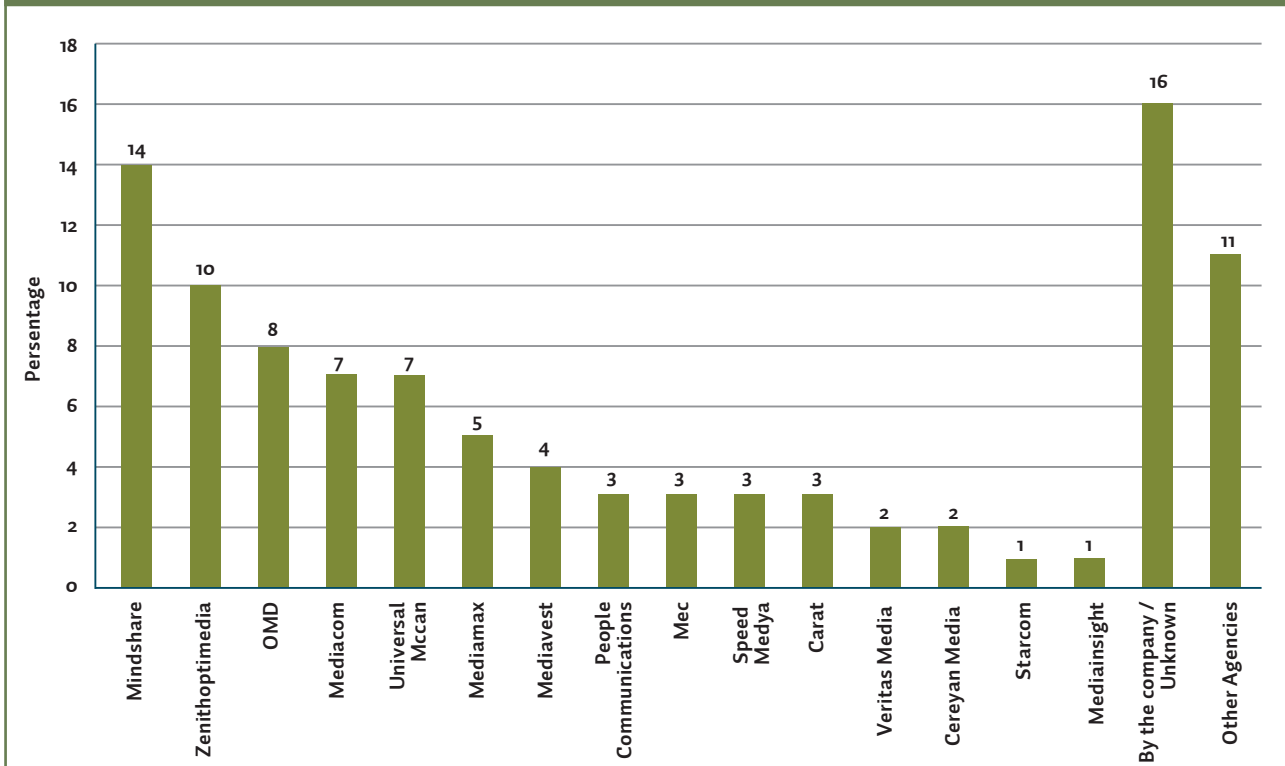
Media planning agencies, which operated as departments within creative agencies in the initial years, began breaking away from advertising agencies and incorporate as their workloads increased (market surveys, reporting processes and data collection etc.) and as media channels diversified. Today, these companies mostly serve as Turkey's offices of global networks. According to 2009 data, all of the top 10 media planning agencies in Turkey are affiliated with global advertising and media planning networks.

Most of these networks serve clients operating in the international arena. Local advertisers with high advertising expenditures are also included within this structure. Among the media planning agencies, which are influential in the distribution of advertising expenditures across channels, the top 10 agencies dominate virtually all of the decisions concerning the distribution of advertising expenditures. In some cases, this structure of the market reduces the chances of survival of the media enterprises that are ignored by media planning agencies except for advertisers' choices, by reducing their chances of taking ads. When distributing the advertising expenditure, media planning agencies evaluate the ratings/ circulation of the channels. However, the inconsistencies between these data allow media planning agencies to use their own initiatives, once again placing large media groups in an advantageous position.

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112 Medicat, January 2010.

Chart 28: Market Shares of Media Planning Agencies, 2010



Source: ZenithOptimedia (2010)

Let us take a closer look at the top 10 media planning agencies in Turkey:

**Mindshare:** One of the media planning agencies operating within the *WPP Group* under the umbrella of *Grup M* with 141,000 employees, 2400 offices and presence in 107 countries, *WPP Group* has 97 *Mindshare* offices in 67 countries. *Grup M*'s yearly revenue for 2010 was announced as \$2.06 billion. Included in this figure, *Mindshare Worldwide*'s yearly revenue for 2010 is \$713 million<sup>113</sup>.

**Zenith:** Operating in 70 countries with 195 offices, *Zenith* is a part of the *Publicis Group*. It was established in Turkey in 1996 under the *Güzel Sanatlar Grubu*. Today, *Zenith Medya*

and *Optimedia* operate as two separate and independent media agencies within the same group. *ZenithOptimedia*'s annual revenue for 2010 was announced as \$673 million.<sup>114</sup>

**Starcom:** One of the three agencies included under *MediaVest Group*, which consists of *MediaVest*, *Spark* and *Starcom*. Growing by 22% in 2009, it ranked 20th among the 170 country offices operating under the group.

**Mediacom:** Operates in 81 countries with 106 offices, it is one of the media planning agencies included within *Grup M*, which itself is under the *WPP Group*. Its revenue for 2010 is \$570 million.<sup>115</sup> It began its operations in Turkey in 2005.

113 Advertising Age, "Agency Report 2010 Index," <http://adage.com/article/datacenter-agencies/agency-report-2010-index/14295>.

114 Ibid.

115 Ibid.

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**Universal McCann:** It operates under the *McCann-Erickson World Group*, under the *INTERPUBLIC Group* and serves at the media planning leg of the *McCann-Erickson Advertising Agency*, which has offices in 100 countries.

**OMD:** An enterprise of the *Omnicon Group*. Founded in 1996, *OMD* works as the global media partner of three big advertising agencies, namely *BBDO*, *DDB* and *TBWA*. It has over 140 offices in 80 countries. *OMD Worldwide's* annual revenue for 2010 was \$730 million<sup>116</sup>.

**Carat:** Operates under the *Carat Universal Aegis Group* founded in 1968; it has offices in 70 countries. Upon *Aegis Media* buying *Mediatürk's* shares in 2005, it merged with *Mediatürk* in January 2006.

**MEC:** Included under the *WPP Group*, it is active in 84 countries with 250 offices. It was established in Turkey in 2001, and is one of the media planning agencies within *Group M* under *WPP Group*. Its 2010 revenue was \$595 million<sup>117</sup>.

**MPG:** Included within the *Havas Media Group*. Has been operating at the global level since 1978, and in Turkey since 2001.

**Vizeum:** Included within the *Aegis Group*, it has 61 offices in 50 countries and has been operating in Turkey since 2007.

## Digital Agencies

The popularization of the Internet in the late 1990s and early 2000s resulted in advertising clients and suppliers recognizing this new venue and reflecting on how they could use it more effectively. In addition to full-service

agencies, the increased importance of the Internet for the advertising sector led to the establishment of digital agencies specializing in and providing services only in this area. In the initial years, agencies tried to create their ideas for the Internet within the digital departments they set up within them, whereas the structure of the Internet as a venue that requires expertise and the client demand for this expertise led to a rapid increase in the number of digital agencies in the last decade in Turkey. While there were roughly 10 digital agencies in the early 2000s, today they number over 100. Establishment of *IMD* (Internet Media Association) and *IAB* in Turkey were important milestones for the sector. The establishment of *INTERACT* (the Interactive Advertising Bureau) in 2010 is an important indication that digital advertising is becoming a sector on its own.

## 6.2. TV SERIES PRODUCTION

The TV series production sector is one of the important sources feeding the media, particularly the television broadcasting and the motion picture sectors. Achieving considerable growth since 2005, the TV series sector has also today become an export sector. Today, a significant part of the prime-time programming on TV channels is allocated to series. In 2004, series constituted 49% of the programme types broadcast by the top five TV channels, while this ratio reached 66% in 2010.<sup>118</sup> The overwhelming pre-eminence of series among the programme types getting the highest ratings is also striking.

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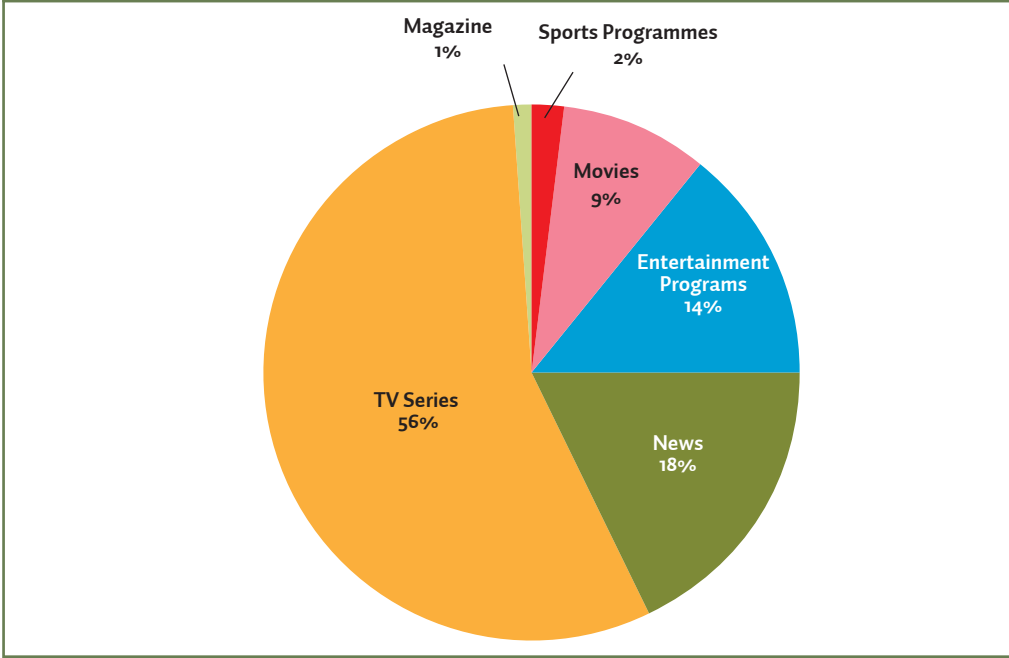
116 *Ibid.*

117 Advertising Age, "Agency Report 2010 Index," <http://adage.com/article/datacenter-agencies/agency-report-2010-index/14295>.

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118 Mindshare, "Market Overview", 2010.

Chart 29: Distribution of Programmes with Highest Rating by Type



Source: Mindshare, 2010

According to the Dizi Ekonomisi – Mayıs 2010<sup>119</sup> (Series Economy - May 2010) report released by the Istanbul Chamber of Certified Public Accountants (İSMMMO), there were 42 indigenous series being broadcast on seven national channels by the date of the report. Demonstrating that the series economy has shrunk by 30% compared to 2008 numbers due to the impact of the global crisis, the report states that high-budget TV series employ 60-100 people, on average, in addition to a cast of 20-30. It is estimated that the total number of employees in the sector is 150 thousand, with 50 thousand having lost their jobs during the crisis.

Problems concerning the working conditions of those working in TV series have been frequently voiced in recent years. Series' workers working without insurance and under severe conditions also come on the agenda because of the occupational accidents they suffer. According to an announcement by the Cinema Workers Union, the daily working hours of those working in TV series reach 18-20 hours; in the last five years, five cinema production employees have lost their lives; several more have been victims of accidents.<sup>120</sup>

According to İSMMMO's report, actors/actresses of TV series get 5 to 20 thousand Turkish Liras per episode. Series' casting demands are met by casting agencies number-

119 Most of the data used in this section of the study were taken from the report. However, the report does not specify the research methodology and techniques used. In an interview, it was expressed that the data were collected through interviews with production companies. The report can be found at [http://archive.ismmmo.org.tr/docs/yayinlar/kitaplar/2010/10\\_10%20dizi%20arastirmasi.pdf](http://archive.ismmmo.org.tr/docs/yayinlar/kitaplar/2010/10_10%20dizi%20arastirmasi.pdf).

120 "Sine-Sen, Sinema ve TV Dizisi Çalışanlarının Haklarıyla İlgili Duyuru Yayınladı", <http://www.sanatzazete.com/2011/01/04/sine-sen-sinema-ve-tv-dizisi-calisanlarinin-haklariyla-ilgili-duyuru-yayinladi/> (04.01.2011).

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ing above 100 today; between them, they have 50 thousand registered actors/actresses on their rosters. In addition to those who are pursuing a professional acting career, many others sign up at casting agencies with the hope of finding a second job or becoming famous. Actors/actresses coming out of these agencies receive a daily wage of TL30-100. Directors' wages range between TL20-25 thousand and scriptwriters' between TL10-15 thousand.

According to the same report, the size of the TV series sector was identified as TL700 million in 2010. This figure was announced as TL1 billion in 2008, indicating a 30% shrink.

The considerable air time dedicated to TV series in recent years has had a huge effect on advertising revenues. According to the report, series ads brought TL300-900 thousand before the crisis, going down to TL200-400 thousand after the crisis, a reduction of 20%; it indicates that sponsorship revenues vary between TL10-70 thousand. While the cost of shooting a drama series reaches TL300 thousand on average, the cost of sit-coms is between TL60-100 thousand. Production companies sell the series to TV stations after adding on a profit of 20-40%.

The ISMMMO Report suggests that TV series' production is a highly lucrative sector both for production companies and television channels. The series produced in Turkey are now exported to other countries; the Undersecretariat of Foreign Trade also supports these initiatives.<sup>121</sup> Series produced in Turkey constitute 60% of the foreign programme share in Middle Eastern countries; generally, revenue of \$500-20 thousand is generated per

episode.<sup>122</sup> Additionally, in recent years the interest shown by foreign investors in the media sector and particularly in television enterprises also includes production companies.<sup>123</sup>

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121 Undersecretariat of Foreign Trade, <http://www.dtm.gov.tr/dtmweb/bakanHaberDetay.cfm?haberNo=591>.

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122 "Dizi film ihracatı 2010 yılında 50 Million doları aştı", <http://www.trt.net.tr/haber/HaberDetay.aspx?HaberKodu=6b461cc3w-48b9-4958-bbb9-559fbaf43f5f> (15.01.2011).

123 TESEV's workshop on the "Investment and Competition Relations in the Media Sector: Present and Future of the Sector," Istanbul (21.04.2011).





# Conclusion

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Print media, launched under state control, entered an industrialization trend in the 1960s. Changes in economic policy after 1980 made this area attractive for investors operating in other sectors. The event having the most impact on and even shaping today's media market in Turkey was the economic crisis of 2001. After the crisis, which forced some of the holdings that had investments in both the financial and media sectors to withdraw from the market, groups managing to remain in the market got stronger while enterprises belonging to those wiped out of the system were transferred to TMSF and in time sold through tenders. In this new period, interest in the media increased in parallel with economic growth and the number of foreign investors showing an interest began to increase.

Media markets that attract interest due to their potential to influence public opinion and that require high investment costs (the influence of economies of scale) operate under conditions of monopolist market structures almost everywhere in the world, and their healthy operation is possible only through sound regulation. In countries such as Turkey, the cause of the concentration in the market has centred on the problems in regulation, in addition to or even more effectively than on economies of scale. With the abolition of the monopoly on public broadcasting in the mid 1990s and with the launch of private radio-TV broadcasting stations, a cross-ownership trend occurred, and the relevant laws failed to prevent the domination of a few groups over a

large section of the sector, despite various efforts to prevent concentration in the sector, today called the media domain.

The inability of the existing system to find a solution to the concentration problem, the high entry barriers caused by the 25% share ownership limit against foreign investors and the failure to allocate frequencies, in addition to the development of new technologies and the efforts to align the legislation with the EU have made it a must to enact legal regulations in the area of radio-television broadcasting.

The Law on Establishment of Radio and Television Enterprises and Their Broadcasts coming into effect on 3 March 2011 attracts the most criticism on the grounds that the broadcasting principles are regulated with excessively-detailed and ambiguous expressions in a manner that can limit freedom of thought. It also garners criticism due to the perception that broadcasting types other than commercial broadcasting are further restricted. It is clear that this situation is not in conformity with the regulations of the EU. Yet, the area of commercial broadcasting, on which the law focuses, is regulated more extensively by filling the gaps existing in the previous law, and is in keeping with EU regulations. Regarding media ownership, restrictions in the previous law were considerably expanded, and a new system focusing on market shares was introduced to prevent monopolization. However, the uncertainty about how this system is to be implemented, and the lack of any regulations on cross-ownership, create the



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impression that the measures taken will not be sufficient to prevent concentration. Nevertheless, the setting of an ambitious calendar for resolution of the yet to be solved frequency distribution problem, the inclusion of new technologies in the regulation, and the limitation of broadcast interruption penalties, which are perceived as censorship, as well as the transition to a fairer auditing system for local broadcasters, are the promising aspects of the new regulations.

The presence of similar problems in the other legal arrangements concerning the structuring of the media sector also draws attention. For example, the Press Law also does not include any regulations to prevent cross-ownership. Internet Law no. 5651 regulates the content area too narrowly and inconsistently. The lack of sufficient clarity about implementation of the sanctions and the lack of sufficient information on the judicial process have placed Turkey on the watchlist of countries engaging in Internet censorship.

What makes the media sector attractive and pushes investors to invest in more than one media outlet is the media's power to influence public opinion, which is sometimes overestimated, and the desire to earn advertising revenue, because, as is well known, in the media market the real revenue comes from advertising. In Turkey, advertising revenues have seen a significant upward trend since 2002; they are expected to reach a level close to 10 billion by 2014. Considering that its ratio to GDP remains in the neighbourhood of 0.3 – 0.4%, it is clear that advertising revenues have the potential to grow further.

However, the advertising pie, which today feeds many media channels, is far from being large enough; the television sector gets more than half of that pie, in any event. This is a result of the high number of television channels and the low price of TV advertisements due to the

competition between channels. Under these circumstances, even clients with limited budgets may find it preferable to spend their advertising budgets in television, since it has the highest accessibility and greater visibility.

In the distribution of advertising revenues, the greatest share goes to television enterprises broadcasting nationwide on terrestrial frequency. The share received from advertising revenues by television broadcasting also attracts foreign investors, and even the TV series production companies, which have become very important for television advertising revenues by increasing ratings, get their share from this increased interest.

The share of television ads and the competition between television channels limit the growth of advertising revenues across all other media outlets and prevent more balanced shares for them. However, with the limits introduced to advertisement durations with the new Law no. 6112, it is expected that first ad prices will rise, then some portion of the advertising revenues will shift to other media venues. Additionally, it appears that the media planning agencies acting on behalf of advertisers have an influence on the distribution of advertising revenues in the media sector, though not as much as the advertisers themselves. In this area, the entire market is in the hands of ten media planning agencies with international partners. The tendency of media planning agencies to work with large media groups and their potential to influence advertisers in that direction mostly affect the small-sized, independent broadcasters and narrow their living space.

The second largest share in advertising revenues goes to print media and, within it, to newspapers. In general, parallelism between the distribution of advertising revenues and circulation numbers is to be expected in print media. However, in the area of newspaper

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publishing, competition is seen in advertising revenues rather than in sales. So many newspapers operating within a market structure which has a high concentration and which can be called oligopolistic can only survive by absorbing loss. Nevertheless, it was also established that the newspaper getting the largest share from advertising revenues manipulates the prices (sales and ad prices). With this structure, it is clear that newspaper publishing, which is considered to be on its dying legs, is not attractive to new investors, especially foreign investors. In newspapers where sales and ratings are gradually decreasing and where advertising revenues are shifting toward television and the Internet, and in magazines that are more adversely affected from this situation, the practice of giving out promotions still remains of vital importance. Another situation arising in print media in a more marked way than the other subsectors is the reflection of political polarization on advertising revenues. Considering that some publications simply absorb losses, competition in publishing quality does not seem possible.

In Turkey, magazines and radios are the media outlets that appear to have been sacrificed with regard to advertising revenues and their distribution. Even the larger publishing groups controlling the media are withdrawing from this venue where advertising revenues are decreasing and are willing to share the existing pie with smaller media groups.

The most important areas where all these media outlets/venues converge are on the Internet and, more recently, in the mobile communication areas. Although it has only received approximately 6.5% from advertising revenues, considering its growth rate and the percentages it has achieved in the US and the UK, the Internet is seen as being in a determinant position with regard to the future of the media. Advertising has become the primary source of revenue in the areas of Internet and

mobile publishing also, much as it is in the traditional outlets. However, major debates concerning competition are flaring up in this sector as well. The fact that Türk Telekom, which holds the entire infrastructure of the country, is subject to the same conditions as other companies makes it virtually a monopoly in the Internet access market; the company, which also holds investments in the areas of GSM and hence in mobile publishing, also provides content services. This situation indicates that Türk Telekom has entered the media sector as a player with major competitive advantages, and will make its impact felt more in the near future with increased access and use of new technologies.

The concentrated structure of the media markets in Turkey and the presence of enterprises that operate only for the sake of having media power even under less than economically advantaged conditions affect labour relations and hence media content. The most important challenge faced here so far is where journalists are forced to waive their contractual and organization rights due to the increased concentration of the market. Today, in almost all media sectors, the average year of seniority for employees is less than five years. The high employee turnover rate suggests that specialization and experience, which are of utmost importance due to the social function of the sector, are more or less pushed to the back burner. As a case in point, experienced journalist Ahmet Şık, who participated in the workshop on this area of the study, gave an account of his experience in the mainstream media; as a result of his actions concerning contractual and organization problems that ultimately left him jobless. He is currently on trial; furthermore, he remains ignorant of the charges against him. This and similar examples show that journalists are deprived of even the simplest guarantees that the state is obligated to make to in order to maintain their jobs.

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Media enterprises operating on low profits due to the effect of concentration and monopolistic practices, some of which operate at a loss, also exert pressure on employees through wages. As aforementioned, those formally employed in the media sector receive an average monthly salary of TL1250; this figure is even lower for those working informally. Data also show that there are huge discrepancies between the wages of employees. In other words, media owners and executives prefer low-cost, low-wage and inexperienced journalists over experienced ones. Another important matter that must be addressed is the apparent bias against women in terms of the number of male-female employees. This situation is no doubt reflected not only in the problems existing in labour relations but also in the quality of media contents.

To solve the problems of the media sector originating from both structuring and legislation, first, there is a need to create platforms where sector representatives, employees, advertisers, advertising agencies, researchers, regulators and even readers/viewers can assemble and speak their minds. The judgments and prejudices of the respective parties stemming from past experience prevent them from engaging in effective communication with one another. The call to come together to solve the problems of the sector failed to get a response, at times even in the workshops organized within the scope of this study. None of the regulations made in this environment make the parties happy; the regulators' attribution of importance to participation, their statements that they were open to all views, and presentation of the drafts to the public all failed to dislodge the perception that the process is not run transparently.

The problem concerning transparency shows itself not only in regulations but also across the media domain. The data evaluated within

the scope of this study were hindered many times by red tape or trade secrets; these obstacles were partially surmounted with the support of those wishing to see development and transparency in the sector. It is clear that sound measurements/meterings accessible to all will alleviate the misperceptions on the media sector in similar studies, thereby making a greater contribution to the resolution of problems.

This study demonstrated that many valuable proposals have been devised by several non-governmental organizations, professional organizations, communication experts, employee organizations and trade unions concerning the development of the media sector, increased competition, improvement of working conditions and increased content quality. There are also many public agencies or regulatory authorities that aim to realize most of these suggestions and that are subject to different regulations. Creating an autonomous, inclusive umbrella organization covering the entire media sector will be useful in eliminating contradictions in the regulations, discussing what correct and effective regulation should look like and ensuring healthy communication and coordination. However, what should be kept in mind here is that the healthy functioning of this umbrella organization can only be possible through an autonomous and independent structure where all of the various areas of the sector (professional organizations, employee organizations, reader/viewer representatives, academia) would be invited to participate openly, as seen in the examples of other countries. An umbrella organization that does not possess these qualities and, more importantly, that cannot act autonomously and independently would no doubt further deepen the already existing problems instead of solving them, and its decisions and practices would create the perception of censorship.

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# ANNEX 1: Which Media Group Owns Which Companies, 2011

Which Media Group Owns Which Companies, 2011		
Company	Media Companies	Other Sectors
Doğan Group	<p>Newspapers: <i>Hürriyet</i>, TME Newspapers (Iz Ruk v Ruki, <i>Expressz</i>, <i>Oglasnik</i>), <i>Daily News</i>, <i>Radikal</i>, <i>Posta</i>, <i>Fanatik</i>,</p> <p>TV: Kanal D, Star TV, TV channels partner with Turner: TNT, CNNTürk, Cartoon Network Interactive Channels: (Fix TV, Digital TV Platform: D-Smart, Doğan Telemarketing</p> <p>Radio: RadyoD, CNNTürk Radyo, Slow Türk, Radyo Moda</p> <p>TV-Music Production: D Productions, Kanal D Home Video, DMC</p> <p>News Agency: DHA</p> <p>Periodical-Book Publishing: Doğan Burda Magazine, Doğan Egmont, Doğan Books</p> <p>Internet: hurriyet.com.tr milliyet.com.tr yenibiris.com.tr hurriyetemlak.com milliyetemlak.com hurriyetoto.com arabam.com anneyiz.biz Hurriyetkiyasla.com Tipeez.com arakibulaki.com hangisinegitsek.com TME siteleri ww.nekretnine.net www.auti.hr www.irr.ru www.job.ru www.expressz.hu www.szuperallas.hu www.mojedelo.com www.oglasnik.hr www.posao.hr</p> <p>Digital Services: Doğan Platform Doğan Telekom Smile ADSL Birpa Müşteri Hizmetleri (Call Center)</p> <p>Distribution and Retail: YAYSAT (Doğan Dağıtım) Magazine Marketing Planning D&amp;R</p> <p>Printing: Doğan Printing Center (DPC), Doğan Ofset</p> <p>Europe: DMG International TME Kanal D Romania Euro D Euro Star</p> <p>Other activities: Doğan Dış Ticaret (Foreign Trade) Doğan Factoring</p> <p>Social Activities Aydın Doğan Foundation</p>	<p>Energy: Electricity Investments (Boyabat Electricity Product and Trade Limited Company, Doğan Energy)</p> <p>Industry: Çelik Halat, Ditaş (Automobile Side Industry), Doğan Organic products</p> <p>Trade: Doğan Automotives, Milpa, Hürriyet Marketing</p> <p>Finance: DD Housing Finance</p> <p>Tourism: Milta</p>

## Which Media Group Owns Which Companies, 2011

<p><b>Doğuş Group</b></p>	<p>Television: NTV, CNBC-E, NTV SPOR, Kral TV, e2, NBA TV</p> <p>New Media: NTVMsNBC, Oley.com,</p> <p>Radio: NTV Radyo, Kral FM, Virgin Radyo, NTV SPOR Radyo, Radyo N101, Radyo Voyage, Radyo Eksen</p> <p>Magazines: <i>Vogue, National Geographic, National Geographic Kids, Billboard, Robb Report, CNBC-e Business, Motor Boat &amp; Yatching</i>, NTV Yayınları, <i>NTV Tarih, NTV Bilim</i></p>	<p>Banking and Finance: Garanti Bankası, Garantibank International N.V., Garantibank Moscow, Garanti Investment, Garanti Portföy, Garanti Leasing, Garanti Flect Manager Services Inc., Garanti Factoring, Garanti Pension and Life, Garanti Payment Systems, Garanti Mortgage, Garanti Technology</p> <p>Automotive: Doğuş Otomotiv, Doğuş Oto, D- Auto Suisse, DOD, Yüce Auto, Oto-Fix, vdf Holding Inc., TÜVTÜRK, Leaseplan, Üretim</p> <p>Construction: Doğuş Construction Inc., Ayson Drilling and Research</p> <p>Tourism &amp; Services: Antur Turizm, Garanti Turizm, Datmar Turizm Inc., Göktrans Turizm, Voyager Mediterranean Turizm, Arena Giyim, Do-Ça Textile Cleaning Inc., Doğuş Marines Group, D-Gym</p> <p>Real Estate: Doğuş Real Estate, DOĞUŞ-GE GYO</p> <p>Energy: Boyabat Electrical Production and Trading Ltd. Company, Doğuş Energy Production and Trade Inc. (Artvin HES), Aslançık Electrical Production and Trading Ltd. Company, D-Tes Electrical Energy Wholesale Inc.</p>
<p><b>Çalık Holding</b></p>	<p>Newspaper: Turkuvaz Media Group (<i>Sabah, Sabah Avrupa, Yeni Asır, Takvim, Fotomaş</i>,</p> <p>Magazines: Turkuvaz Magazine Publication TV: <i>ATV, ATV Avrupa</i></p> <p>Radio: Turkuvaz Television ve Radio Management Industry and Trade Inc.</p> <p>Distribution: Turkuvaz Distribution Marketing Inc.</p> <p>Book Publishing: Turkuvaz Bookselling Publishing Industry and Trade Inc., Turkuvaz Typography Publishing Industry and Trade Inc.</p> <p>Production: Turkuvaz Production and Promotion Inc.</p> <p>News Agency: Turkuvaz News Agency</p> <p>Dijital Media and Mobile Services: Turkuvaz Medya Digital, Turkuvaz Mobile Services</p>	<p>Textile: Gap Güneydoğu Tekstil, Türkmenbaşı Tekstil Kompleksi, Türkmenbaşı Jeans Kompleksi, Balkan Dokuma, Serdar Pamuk Eğrici, Serdar Altın Asır Tekstil Kompleksi, Çalık Alexandria</p> <p>Energy: Çalık Energy, Bursagaz, Kayserigaz, Naturelgaz</p> <p>Construction: Gap Construction</p> <p>Finance: Aktif Bank, Banka Kombetare Tregtare (BKT)</p> <p>Telecommunication: Alb Telecom</p>
<p><b>Ciner Group</b></p>	<p>Ciner Publication Holding: Newspaper: <i>Gazete Habertürk</i>, Ciner Media Investments, Ciner Newspaper Magazines (dergi yayıncılığı), Habertürk Newspaper and Typography, C Yapım Filmcilik, GD Gazete Dergi (dergi yayıncılığı) TV: Habertürk , Bloomberg HT</p>	<p>Energy and Mining: Park Termik, Park Technicals, Eti Soda, Park Energy, Park Electricity, Silopi Electricity Production, Park Electrical Energy Sales, Park Maden</p> <p>Trade, Industry and Services: Park Holding, ETİ Air Transportation Inc., Park Import Export, Park Mechanics, Park Medicine Health, Havaş, Larespark Hotel, Park Shipping, Denmar, Park Insurance, Park Construction, Ciner Shipping</p>

Which Media Group Owns Which Companies, 2011	
<p><b>Çukurova Group</b></p> <p>Newspaper: <i>Akşam, Güneş</i></p> <p>Magazines: <i>Alem, Stuff, Platin, FourFourTwo, Autocar</i></p> <p>Digital Platform: DIGITURK</p> <p>TV: <i>Show TV, Show Max, Show Turk, Show Plus, Sky Turk</i></p> <p>Radio: <i>Alem FM, Lig Radyo</i></p> <p>Production: Eksen</p> <p>Media Marketing: Zedpaş, Mepaş</p>	<p>Energy: Genel Enerji, Taq Taq Operating Company</p> <p>Telecommunication: TURKCELL, Kuzey Kıbrıs TURKCELL, Geocell, Kcell, Azercell, Moldcell, Life, Global Bilgi, Superonline, Tellcom, KVK, Inta Spaceturk, Millenicom, KVK Teknik Servis, TURKCELL Teknoloji, European Telecommunication Holding E.T.H AG, Atel, Topaz, Inteltek, Turkkule, Hobim, Bilyoner.com</p> <p>Transport &amp; Services: Geden Lines, Baytur Trading S.A., Baytur S.A., Anatolia International Trade and Transport Inc, Inter Depo, Pamuk Spor, Kefar, Çukurova Aviation Inc.</p> <p>Industry: BMC, Çukurova Import and Export Türk Inc., Çukurova Machine Manufacturing and Trade Inc., Cumitaş, Çukurova Construction Machine Industry and Trade Inc. (Çimsataş), Çukurova Agriculture, Maysan Mando, Çukurova Chemistry, Daussan, Kaplamin Packing Industry Trade Inc., Çukurova Industrial Companies T.Inc., Selkasan, SCA Packaging, OVA SCA Packaging, Noksel Steel Pipe Industry Inc., Atkasan, Çukurova Diesel Generators</p> <p>Finance: BCP, Mapfre General Insurance, Mapfre Life Insurance</p> <p>Construction: Baytur</p>
<p><b>Feza Journalism</b></p> <p>Newspaper: <i>Zaman, Today's Zaman, Zaman Azerbaycan, Zaman Kazakistan, Zaman Avusturya, Zaman Avrupa Zaman Bulgaristan, Zaman Romanya, Zaman Türkmenistan, Zaman Amerika</i></p> <p>Magazines: <i>Aksiyon, Sızıntı, Gonca</i></p> <p>TV: <i>STV, S Haber, Mehtap TV, Ebru TV</i></p> <p>News Agency: Cihan</p> <p>Radio: <i>Burç FM</i></p> <p>Book Publishing: <i>Zaman Kitap</i></p>	
<p><b>Albayrak Group</b></p> <p>Newspaper: <i>Yeni Şafak</i></p> <p>TV: <i>TVNET</i></p> <p>Internet: <i>Yenişafak</i></p>	<p>Construction: Albayrak GYO, Albayrak Construction</p> <p>Industry: Tümosan Tractor and Motof Factory, Ereğli Integrated Textile Factory</p> <p>Logistics: Trabzon Harbour, Albayrak Rent a car, Albayrak Personnel Transport</p> <p>Services: Al-Bil Computing, Waste Management (Yeşil Adamlar), Meter Reading</p> <p>Tourism: Albayrak Turizm</p>

Which Media Group Owns Which Companies, 2011		
Koza İpek	Newspaper: <i>Bugün</i> TV: <i>Kanaltürk, Bugün TV</i>	Printing House: Koza Invitation Mining: Koza Gold Facilities Inc (Ovacık Gold Mine, Mastra Gold Mine)
Fox Group	Television: <i>Fox TV, Fox life, FX, National Geographic Channel, Baby TV Channel</i> Internet: <i>Myspace.com</i>	
İhlas Group	Newspaper : <i>Türkiye</i> TV: <i>TGRT Haber</i> News Agency: <i>İHA</i> Advertising: <i>İhlas Advertising Agency</i> Media Marketing: <i>TGRT Marketing</i> Magazines Group Internet: <i>İhlas.net</i>	Construction: <i>İhlas Construction Group</i> Manufacturing: <i>İhlas House Appliances, Bisan, Kristal Kola</i>  Health & Tourism: <i>Türkiye Newspaper Hospital, İhlas Armutlu Holiday Village, Kuzuluk Holiday Village, Kuzuluk Thermal Hotel</i>  Education: <i>İhlas Private High School</i> Mining: <i>İhlas Mining Inc.</i>
DK Journalism and Publishing (Karacan – Demirören Partnership)	Newspaper: <i>Milliyet, Vatan</i> TV: <i>Number One TV, Fashion One TV,</i> Radio: <i>Number One FM, Radyo Klas,</i>	Demirören Group of Companies: Gas Group: <i>Milangaz, Likidgaz, Mutfakgaz, Güneşgaz</i> Industry Group: <i>Demirören Tube Inc., Azerbaijan Industry, Parsat Piston Inc.</i> Construction Group: <i>Demirören Construction</i> Education Group: <i>Ata Private High School</i>
Dünya Group	Newspaper: <i>Dünya gazetesi</i>  Printing: <i>Dünya Süper Web Ofset Inc Dünya Publication Inc., Dünya Aktüel Inc.,</i> Distribution: <i>Dünya Süper Distribution</i> E-Dünya: <i>kobiden.com, dunyastore.com, pcworld.com.tr, computerworld.com.tr, byte.com.tr, dunyagida.com.tr, dunyainsaat.com.tr, makinamagazin.com</i>	
TMSF	<i>Olay TV, Olay FM</i>	Public
Spectrum Media	<i>Süper FM, Metro Fm, Joy Fm, Joy Türk FM</i>	Actera Group (Private Fund) <i>Mey İçki, G2M, LBT Varlık Yönetim, Mars Entertainment Group</i>
MNG Holding	TV8	Construction: <i>Günel İnşaat, Ticaret ve Sanayi Inc., MAPA Construction and Trade Inc., MNG ESMAŞ Inc., MNG Tesisat Inc., MNG Targem Inc., MNG Zemtaş Inc.</i>  Tourism: <i>MNG Turizm</i> Transport: <i>MNG Airlines and Transportation Inc., MNG Kargo</i> Finance: <i>MNF Factoring, MNG Leasing</i> Aircraft Maintenance: <i>MNG Technic</i>  Energy: <i>Derya Electricity Production and Trade Inc., BGT Mavi Energy Electricity Production Distribution Marketing Industry and Trade Inc.</i>
Termikel	KTV Publication: <i>Kanal A, Radyo A</i>	Industry: <i>Termikel Inc.</i>
Mediasa (Sabancı)	<i>Fashion TV Türkiye, Fashion TV Magazine, Z TV</i>	Textile: <i>Demsa Group, Harvey Nichols</i>

# ANNEX 2: Average Daily Sales, Numbers of Newspapers

Daily Average Sales, Numbers of Newspapers										
Daily Average Circulation March-December 2010										
Newspaper	March	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
Zaman	796,705	879,818	879,818	799,472	714,021	674,986	654,900	797,932	877,821	867,710
Posta	506,414	509,915	509,915	509,860	498,645	490,128	473,383	473,634	451,908	485,591
Hürriyet	480,318	467,100	467,100	445,720	434,913	439,494	429,983	448,292	431,793	435,667
Sabah	362,336	345,914	345,914	334,999	338,739	345,032	355,093	346,040	342,824	341,690
Habertürk	280,594	246,896	246,896	236,932	244,167	249,386	244,366	228,120	217,211	222,623
Milliyet	217,489	172,809	172,809	161,897	158,252	153,463	159,230	161,376	153,056	155,991
Vatan	173,205	156,716	156,716	146,218	136,644	141,647	134,630	138,157	153,056	131,431
Sözcü	151,183	152,660	152,660	179,552	189,979	209,099	231,922	216,426	210,644	216,301
Türkiye	140,603	140,342	140,342	141,978	139,557	134,098	127,001	130,810	131,057	131,824
Takvim	140,208	103,854	130,854	120,587	123,514	121,125	118,658	117,623	110,047	109,186
Akşam	138,914	140,731	140,731	141,569	146,777	142,318	141,998	140,221	140,828	142,582
Güneş	105,911	105,419	105,419	102,859	103,508	102,112	101,274	99,686	101,607	102,086
Star	102,790	104,952	104,952	108,641	103,690	106,481	105,980	102,392	102,937	101,223
Yeni Şafak	101,891	102,711	102,711	103,021	102,827	102,154	102,155	102,636	103,031	106,172
Bugün	73,731	71,615	71,615	69,937	70,884	70,179	67,640	66,473	67,167	73,647
Milli Gazete	52,639	55,367	55,367	52,822	50,959	50,405	51,404	50,437	50,737	50,841
Vakit	52,279	52,345	53,345	54,388	54,162	54,158	53,621	24,037	6,214	6,060
Yeniçağ	51,690	51,710	51,710	51,976	52,707	54,047	54,179	52,528	52,955	53,214
Cumhuriyet	51,399	50,657	50,657	54,556	53,646	53,265	53,539	51,843	57,026	55,257
Şok	50,398	50,667	50,667	50,556	50,402	50,513	52,235	50,388	50,242	50,553
Taraf	50,379	50,710	50,710	50,405	51,581	53,131	50,503	50,793	51,570	50,419
Radikal	37,596	37,990	37,990	37,689	37,645	37,686	36,885	64,304	84,946	79,189
Dünya	26,410	26,424	26,424	26,447	26,163	26,336	26,408	26,385	26,495	26,450

## Daily Average Sales, Numbers of Newspapers

Daily Average Circulation March-December 2010

Newspaper	March	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
Referans	17,205	16,904	16,904	16,747	16,557	16,145	16,546			
Yeni Asya	12,338	11,886	11,886	10,961	10,589	11,612	11,810	11,640	10,657	10,677
Tercüman [kapandı]	9,387	10,554	10,554							
Ortadoğu	7,832	8,294	8,294	8,439	8,604	8,885	8,580	8,260	8,624	9,009
Yeni Nesil	6,853	6,937	6,937	6,986	6,894	6,517	6,394	6,623	6,571	6,833
İstiklâl	6,482	6,480	6,480	6,475	6,478	6,480	6,479	6,481	6,480	6,482
Gazete 34	6,470	6,475	6,475	6,469	6,470	6,475	6,465	6,475	6,470	6,473
İstanbul	6,165	6,294	6,294	7,406	7,212	7,561	7,920	8,283	8,409	7,643
Ayrıntılı Haber	6,159	6,158	6,158	6,156	6,158	6,159	6,160	6,160	6,157	6,156
Önce Vatan	6,105	6,105	6,105	9,909	8,056	8,055	8,055	6,784	5,257	5,270
Tünaydın	6,102	6,086	6,086	6,100	6,103	6,105	6,104	6,105	6,117	6,115
Son An	6,099	6,106	6,106	6,104	6,104	6,107	6,105	6,105	6,116	6,114
Yeni Devir	6,042	6,028	6,028	6,031	6,028	6,023	6,034	6,030	6,023	6,028
Yenigün	6,042	6,038	6,038	6,038	6,040	6,039	6,040	6,038	6,041	6,037
Yeni Akit	6,038	6,040	6,040	6,037	6,041	6,040	6,077	52,850	55,100	51,845
Günboyu	5,897	5,889	5,889	10,884	10,886	10,891	10,878	10,878	10,887	10,875
Dokuz Sütun	5,896	5,899	5,899	5,889	5,888	5,885	5,888	5,883	5,888	8,105
Bizim Anadolu	5,741	5,604	5,604	5,805	5,643	5,355	5,306	5,442	5,596	5,351
Ekonomi	5,454	5,443	5,443	5,475	5,490	5,485	5,504	5,498	5,498	5,521
Yeni Mesaj	5,423	5,418	5,418	5,363	5,384	5,408	5,311	5,251	5,269	5,344
Hürses	5,214	5,183	5,183	5,177	5,057	5,183	5,164	5,157	5,172	5,176
Birgün	5,208	5,262	5,262	5,263	5,162	5,259	5,635	5,610	5,469	5,618
Son Saat	5,180	5,177	5,177	5,184	5,192	5,182	5,192	5,191	5,195	5,185
Bizim Gazete	1,029	1,095	1,095	1,081	1,026	1,088	1,116	1,095	1,199	1,234
<b>Total</b>	<b>4,305,443</b>	<b>4,238,677</b>	<b>4,266,677</b>	<b>4,142,060</b>	<b>4,040,444</b>	<b>4,019,182</b>	<b>3,985,750</b>	<b>4,128,372</b>	<b>4,163,367</b>	<b>4,182,798</b>

Source: Directorate General of Press Advertisement (March-Dec 2010)

# ANNEX 3: Websites by Number of Page Views

Websites by Number of Page Views		
Network	Site	Page Views
MedyaNet	arabam.com	114,286,568
	arakibulaki.com	565,580
	boxerdersisi.tv	18,289,704
	cnnturk.com	10,797,375
	ekolay.net	196,514,587
	fanatik.ekolay.net	109,721,689
	gazetevatan.com	250,105,511
	gezikolik.com	745,597
	haber24.com	2,332,354
	hangiotel.com	150,061
	hangirestoran.com	127,566
	hangisinegitsek.com	133,304
	hurriyet.com.tr	677,701,135
	kanald.com.tr	35,314,874
	kraloyun.com	106,968,573
	milliyet.com.tr	788,928,522
	radikal.com.tr	17,358,910
	realage.com.tr	167,666
	startv.com.tr	8,562,747
	trendus.com	3,579,362
zargan.com	27,442,130	
MedyaNet	Total	2,369,793,815
Mynet	cnetturkiye.com	2,482,648
	mynet.com	1,661,489,694
Mynet	Total	1,661,489,694



## Websites by Number of Page Views

Network	Site	Page Views
Netbook	akampus.com	2,586,126
	chip.com.tr	16,450,477
	cosmoturk.com	0
	gecce.com	3,061,699
	haber7.com	87,405,509
	haberturk.com	265,505,860
	hardwaremania.com	651,851
	interesan.com	748,228
	istiyor.us	2,262,828
	itusozluk.com	18,731,314
	level.com.tr	707,410
	ligtv.com.tr	32,434,144
	mackolik.com	110,957,045
	memurlar.net	126,219,607
	ofansif.com	86,349
	pcnet.com.tr	3,696,720
	powerfm.com.tr	1,682,680
	powerturk.com	2,484,638
	powerturk.tv	262,295
	powerxl.com.tr	110,289
tr.netlog.com	88,974,183	
tureng.com	13,579,818	
zaplatt.com	13,252,690	
Netbook	Total	791,851,760

Websites by Number of Page Views		
Network	Site	Page Views
ReklamZ	1omarifet.com	3,591,583
	22dakika.org	200,663
	ajansspor.com	17,463,832
	araonline.com	0
	autoclubturkey.com	461,350
	bildirgec.org	749,322
	blogidmanyurdu.com	5,111,313
	bobiler.org	11,428,307
	borsamatik.com	580,934
	divxplanet.com	22,020,026
	eksisozluk.com	156,949,568
	finzoom.com.tr	686,110
	fizy.com	11,014,870
	haber3.com	19,160,750
	haberler.com	50,596,912
	haff.org	194,856
	hi5.com	31,516,111
	i-gunler.com	5,265,655
	istanbul.net.tr	2,180,597
	itsbeauty.com	1,408,500
	komikler.com	8,847,757
	modahaber.com	1,791,190
	posta.com.tr	110,163,514
	sinepil.org	76,299
	sondakika.com	5,719,192
	sosyomat.com	8,884,246
	spor3.com	5,981,567
	turk.net	3,323,655
	turkiyefi.com	1,451,141
	yemekevi.tv	105,547
yenimecra.org	0	
yorumcu.com	4,105,351	
zamazing.org	326,311	
ReklamZ	Total	491,357,029

Websites by Number of Page Views		
Network	Site	Page Views
Turkuvaz	atv.com.tr	9,183,532
	automotosport.com.tr	0
	caferuj.com.tr	2,102,258
	cosmodergi.com	0
	fotomac.com.tr	94,899,440
	isteinsan.com.tr	78,666
	otohaber.com.tr	1,147,358
	paradergi.com.tr	45,692
	sabah.com.tr	214,163,796
	sofra.com.tr	635,583
	takvim.com.tr	45,141,629
	turkuvazradio.com	0
	yeniaktuel.com.tr	54,872
	yeniasir.com.tr	3,810,365
Turkuvaz	Total	371,263,191
Virgöl	arabalar.com	312,034
	blogcu.com	57,231,809
	doviz.com	6,579,189
	fotokritik.com	11,455,116
	izlesene.com	212,723,666
	sinemalar.com	26,225,181
Virgöl	Total	314,526,995
Yonja	yonja.com	276,766,979
Yonja	Total	276,766,979
Magnet	cimri.com	4,712,313
	gittigidiyor.com	195,505,155
	timsah.com	32,594,234
Magnet	Total	232,811,702
MedyaGuru	afiyetle.com	1,636,376
	gazeteoku.com	24,784,142
	internethaber.com	76,691,456
	internetspor.com	17,747,522
	maxoyun.com	4,714,888
	modalife.net	855,722
	morbiber.com	1,780,087
	nethaber.com	1,612,049
	porttakal.com	1,726,885
	sahadan.com	97,719,713
MedyaGuru	Total	229,268,840

Websites by Number of Page Views		
Network	Site	Page Views
ComMedya	araba.com	223,382,290
ComMedya	Total	223,382,290
Doğan	gezisesesi.com	727,203
	hepsiburada.com	94,332,275
	hurriyetemlak.com	60,273,353
	hurriyetoto.com	5,351,364
	milliyetemlak.com	21,889,964
Doğan	Total	182,574,159
NTV	ntvmsnbc.com	64,926,141
	ntvspor.net	97,584,178
NTV	Total	162,510,319
GenArt	aktifhaber.com	11,991,999
	antoloji.com	26,720,425
	ensonhaber.com	76,332,493
	hastane.com.tr	5,244,484
	oyungemisi.com	27,827,925
GenArt	Total	148,117,326
Maksimum	karakartal.com	3,486,897
	spox.com	76,431,701
	sporxtv.com	5,838,843
	superfb.com	3,465,529
	webaslan.com	12,029,062
Maksimum	Total	101,252,032
MTV	dailymotion.com.tr	93,816,446
MTV	Total	93,816,446
Logaritma	hayalevi.com	1,079,331
	idefix.com	4,423,460
	itiraf.com	6,377,332
	kahkaha.com	951,191
	siberalem.com	74,160,534
Logaritma	Total	86,991,848
Punto	ceptown.com	4,961,598
	vidivodo.com	54,084,016
Punto	Total	59,045,614
Zaman	samanyoluhaber.com	34,233,900
	zaman.com.tr	22,668,453
Zaman	Total	56,902,353

Websites by Number of Page Views		
Network	Site	Page Views
o	zkadin.com	o
	zyuz.com	1,396,391
	3ayak.org	36,455
	analiztv.com	123,116
	bekamutfagi.com	o
	dizifilm.com	10,434,771
	dobisko.com	269,612
	doktorsitesi.com	6,143,417
	enuygun.com	3,538,753
	evlilikmerkezi.com	1,368,501
	finnet.com.tr	o
	galatasaray.org	12,087,022
	intersinema.com	4,362,284
	medyamoda.com	460,960
	mobiletisim.com	1,787,053
	modaturkiye.com	111,975
	netbebegi.com	o
	oynasana.com	2,783,509
	oyunmemo.com	1,584,687
	oyyun.com	1,209,958
	ozelyemekler.com	o
	rdyofenomen.com	1,936,131
	shiftdelete.net	3,121,682
	sinema.com	943,546
sinemakeyfi.com	o	
tjktv.net	162,071	
ucandaire.org	o	
webgazete.net	o	
o	Total	53,861,894
İpek Koza	bugun.com.tr	17,428,957
	kanalturk.com.tr	899,711
İpek Koza	Total	18,328,668

Source: Gemius, November 2010

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Ceren Sözeri received her bachelor's degree and master's from Galatasaray University. She received her Ph.D. from Marmara University in 2009. She is presently a researcher at Galatasaray University in the field of economics and business administration of media. She is working on media transformation, media business, media mergers and new media business administration.

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