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Independence of Regulatory Authority: Türkiye's Radio and Television Supreme Council

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Abstract

Independent regulatory authorities are expected to act as apolitical agents to prevent market failures in the sector they regulate. However, according to political signal theory, regulatory authorities cannot escape the interventions and control of the political power. In addition, according to capture theory, regulation is designed and operated for the benefit of dominant capital groups in the sector. This article applies both theories to the case of Türkiye's radio and TV sector. Based on our analysis we claim that the Turkish Radio and Television Supreme Council is a unique case of a supposedly independent authority being captured by both the political power and dominant capitalist groups in the sector, which are intertwined with this power, by limiting its administrative and financial autonomy. Our findings show that the close relations between capital groups and important political figures, which have been clear since the sector was first liberalized, have helped these groups gain a privileged position in Türkiye's media sector. As a result, the main instrument that changed the media ownership structure was the interventions of the political power in line with the propositions of the "political signaling" theory.

Keywords: regulation, independent administrative authority, radio television sector, capture theory, political signal theory

JEL Codes: H0, H1, H10

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1. Introduction

According to Article 133 of Türkiye's 1982 Constitution, radio and television companies could only be established by the state. This state monopoly in Türkiye's broadcasting sector continued until 1993, when Article 133 was amended to end it. In 1994, to regulate the newly liberalized sector, Law No. 3984 on the Establishment and Broadcasting of Radio and Television (hereafter Law No. 3984) came into force and the Radio and Television Supreme Council (RTÜK) was established. While undergoing many changes, Law No. 3984 remained in force until 2011. However, new legislation then became necessary for several reasons. The first was new broadcasting concepts as a result of technological advances. Second, the law had lost its integrity due to numerous amendments. Third, membership negotiations with the European Union showed that a radio and television market law was needed in accordance with the Union's Audio-Visual Media Services Directive (2007/65/EC), which accelerated the drafting of a new law (Sümer & Adaklı, 2007). Hence, in 2011, Law No. 3984 was replaced by Law No. 6112. The new law stipulates that RTÜK is an impartial public legal entity with administrative and financial autonomy.

One of the main advantages of independent regulatory authorities is that their depoliticization and agentification allows them to maintain market stability and prevent market failure. The formal institutional structuring of independent administrative authorities requires the delegation of power and controls from politicians to these institutions (Gilardi, 2002; Maggetti, 2007; Thatcher, 2002). These agencies are also ideal tools for responding to market needs by mitigating political uncertainty due to their expertise and technical knowledge (Maggetti, 2009). Only an independent authority, staffed by professionals and shielded from typical political influences, can maintain policy stability and continuity. It is also widely assumed that influencing a board or authority is more difficult than influencing a bureau chief or Cabinet secretary (Bernstein, 1955).

On the other hand, various studies show that independent administrative authorities are subject to political meddling by the political power and also face pressure to respond to the interests of powerful capital groups in the sector they regulate. The interference and control of regulators by the political power is explained by the theory of political signals. This argues that despite their supposed legal independence, independent regulatory authorities actually operate differently. Competition authorities, parliament, courts, politicians and ministries related to the regulated sector can all intervene in the decisions and activities of independent administrative authorities (Böllhoff, 2005; Wynen et al., 2020). These interventions can involve weakening regulatory authority personnel's sense of autonomy through frequent changes in the laws (Terman, 2014) and structural reforms (Kleizen et al., 2018; Wynen et al., 2020), or using administrative control and budget cuts on the independent regulatory authority to exert political control (Carpenter, 1996). Politicians and agency parent ministers can also signal through media announcements, reports, legislative discussions, direct interaction with officials (Wynen et al., 2020), and executive orders (Terman, 2014). Terman (2014) provided new insight into this issue by concentrating on the bureaucracy's reaction to political signals. He claimed that political signals determine how government organizations respond. As a result, agencies perform differently in the decision-making process, issuing licenses or conducting inspections of actors in the field they tasked with regulatory power. It should also be noted that political control can determine not only the action but also the inaction of an IRA. IRAs sometimes take no action or are very receptive to regulated actors in enforcing regulations (Makkai &

Braithwaite 1992). In other words, depending on the signals they receive from politicians, agencies may reduce their stringency towards the regulated sector. Gordon and Hafer (2014) refer to this phenomenon as regulatory forbearance.

However, the influence of political representatives on the operations of regulatory authorities is only one side of the coin. By granting former bureaucrats high-ranking posts in their companies or political parties, a revolving door may be created. When IRA employees consider careers in the regulated sector, they soften their attitudes and begin to connect with the industry's professionals (Makkai & Braithwaite, 1992). For instance, between 2001 and 2015, the percentage of US financial firms employing senior employees with regulatory expertise rose to 24% (Shive & Forster, 2016). What is also striking in the case of RTÜK is that 14% (7 in 49) of those who served as RTÜK members between 1994 and 2022 started working in the media sector after their term of office ended.[1]

Furthermore, regulatory authorities can be captured by capital groups that dominate the regulated sector (Carpenter, 2004; p. 627; 2014, p. 171; Laffont & Tirole, 1991, p. 1118; Stigler, 1971, pp. 7–8; Viscusi, 1992, p. 275). Stigler (1971) was the first to claim that regulation is acquired by the relevant industry, and designed and operated for the sector's benefit (Stigler, 1971, p. 3). Studies of Türkiye's media sector also invoke the idea of 'capture'. However, these studies have focused on media freedom and the relationship between media and the political power rather than the ways actors in the regulated sector capture the regulatory authority and regulation practice. They have also emphasized that the political power has captured the media sector by interfering with the sector's ownership structure. Accordingly, capture is considered as interfering with the freedom of reporting of institutions operating in the media sector (Coşkun, 2020); the political power's control of the official advertising and announcements distributed to newspapers by the state-run Press Bulletin Authority (*Basın İlan Kurumu* - BİK) (Baykal & Coşkun, 2018; Yanatma, 2016, 2021); the concentration of media ownership in the hands of certain groups through government interventions (Adaklı, 2010, 2014); and Adalet ve Kalkınma Partisi-AKP's[2] (Justice and Development Party) re-organization of the media sector as a means of gaining political economic rent whereby media outlets that avoid upsetting the government are rewarded with state tenders (Corke et al., 2014; Finkel, 2015). According to Yeşil (2018), to capture the media sector, AKP has used both coercive (e.g., prosecuting media professionals, closing down media outlets, expropriating assets, and levying fines) and non-coercive strategies (e.g., discretionary allocation to media organizations of state largesse through subsidies, tax breaks, advertising, and privatisation deals). However, in concentrating on media freedom in Türkiye and the relationship between the media and policy changes, studies in the literature (Adaklı, 2010; 2014; Baykal & Coşkun, 2018; Corke et al., 2014; Coşkun, 2020; Finkel, 2015; Yanatma, 2016; Yeşil, 2018) overlook the regulatory authority's role in the capture process.

Based on capture theory and political signal theory, this study evaluates RTÜK's independence by analyzing its financial resources, budgetary autonomy, and regulation of the sector's ownership structure. A qualitative methodology was adopted by consulting documentary sources. The main sources of qualitative documentary data were RTÜK documents, including commercial communication income, advertising revenue, administrative sanctions, and its budget. These provide a comprehensive understanding of how political signals from the political authority can influence the sector's ownership structure and

[1] Ali Baransel. TGRT TV; Fatih Karaca, Koza-İpek Group Media Headquarters; Aykut Zahid Akman, Kanal 7 Editör in Chief; Mehmet Doğan, Zaman; Tülay Çetingüleç, TGRT TV; Beşir Ayvaz, CNN Türk; Şaban Sevinç, Halk TV.

[2] The Justice and Development Party was founded in 2001 and has remained in power since 2002, winning five general elections.

determine to what extent RTÜK has not acted impartially. In addition, we present findings from a qualitative document analysis of media sector regulation legislation (constitutions, sector laws, decree laws, and documents from parliament's Planning and Budgeting Committee), RTÜK's official decisions from 1994 to 2021, newspaper reports from 1994 to 2021, and media interviews.

This paper has two main sections. The first section discusses the ownership structure of Türkiye's radio and television broadcasting services sector. It focuses first on RTÜK's regulatory decisions to establish broadcasting service provider companies and the proportion of shares in these companies' ownership structure. It then examines sector members' investments in order to understand the relationship between political power and the sector's capital groups. The second section explores RTÜK's financial resources and budget to evaluate how independent it is. More specifically, its annual activity reports are used to prepare income and expenditure budget distribution tables.

2. Regulations regarding ownership structures in the media sector

2.1 Proportion of Shares and Partnership Structure

Following media liberalization in 1993, it was crucial to prevent monopolies from forming in the media industry. Therefore, Article 29 of RTÜK Law No. 3984 stipulated that nobody could own more than 20 percent of all shares in any media organization. However, this was amended in 2002 to base the capital share limit on annual audience share data. This allowed a real person, or a corporate or capital group to own up to a 50-percent share of any television firm with an average audience share above 20 percent (Law on the Establishment of Radio and Television Enterprises and Their Broadcasts, 2002). Then-President Ahmet Necdet Sezer quickly petitioned the Constitutional Court for an annulment and suspension of the law's enforcement (Presidency, 2002). In 2004, the Constitutional Court nullified the law (Constitutional Court Decision, 2004). The court justified the annulment on the fact that the highest audience shares in Türkiye were only 14-16 percent, indicating that it would be very difficult in practice to reach the 20 percent share stipulated in the law. More simply, since no TV or radio company had ever achieved a 20-percent audience share, the anti-monopoly law effectively made no difference. Thus, the court asserted that most television and radio institutions would inevitably be owned by the same individuals or capital groups. Additionally, the 20-percent limit stopped the state from meeting its obligation under Article 167 of Türkiye's Constitution to prevent monopolization and cartelization.

In addition, the fact that the AKP came to power alone in the 2002 and 2007 general elections and that the President of the Republic in 2007 was a politician of AKP origin strengthened the government and paved the way for the presence of pro-government groups in the media sector. For example, Albayrak Group, one of the groups close to the government, established TVNET in 2005, Yeni Dünya Media Group established Ülke TV in 2006 and Sancak Group established 24 TV channels in 2007. On the other hand, the Koza İpek Group[3], close to the Gülen movement, established Bugün TV in 2009 and bought Kanaltürk TV, owned by Tuncay Özkan, in 2008. Similarly, we observe that the capital factions that bought the media

[3] Koza İpek Group, which is associated with the Gülen movement, had a pro-government publishing stance prior to 2013. The relationship between the government and the Gülen community was strained after the December 17-25, 2013 actions against the political authority by members of the Gülen movement, which was structured primarily in the police, judiciary, and military.

organizations seized by the Savings Deposit Insurance Fund[4] (SDIF) were mostly media groups close to the government. An example of this is the purchase of the ATV channel, which was seized by SDIF in 2007, by the pro-government Çalık group in the same year.

To open a parenthesis here, in 2007, when Çalık wanted to buy the ATV channel from the SDIF through a public tender, RTÜK's approval process took two months due to the objections of opposition Supreme Council members. The objections centered on Article 29 of the RTÜK Law. Law No. 3984 stipulates that financial institutions and organizations cannot establish private radio and television stations and that the same company can only own one radio and television station (Article 29). In this process, the AKP government tried to provide flexibility to the financial transactions required by the tender process by amending the law regulating the activities of RTÜK (Buğra & Savaşkan, 2014). Despite the dissenting votes of three members of the Supreme Council, RTÜK approved the application of Çalık Holding, the major shareholder of Turkuvaz Medya (Hürriyet, 2008), with a three-month deadline to remedy these contradictions. It seems that even when Çalık sold Turkuvaz Medya to Kalyon Group, which is also close to the ruling party, in 2013, he still did not rectify these contradictions.

After Law No. 3984 was replaced by Law No. 6112 in 2011, the criteria for regulating monopolistic media ownership were redefined in terms of the commercial communication revenues of media service providers. Accordingly, Article 19 paragraph (d) states that a natural or legal person can be a partner in a maximum of four national terrestrial broadcasting licenses with media service providers. In addition, the annual total commercial communication revenues of media organizations cannot exceed 30 percent of the sector's total commercial communication income. This, however, was insufficient to alter the pre-2010 monopolistic structure. According to the regulation[5], real or legal persons whose total commercial communication income exceeds this rate must transfer their shares within a 90-day period specified by RTÜK to reduce their total commercial communication income below 30 percent. Regarding regulation cases in this area, RTÜK's decision on Doğan Group stands out. Since Doğan Group's share of Türkiye's commercial communication revenue was 39 percent when the new law came into force, it had to sell one of its television channels, Star TV, to Doğuş Group, one of the nine largest media groups in Türkiye (see Table 1 below) (Ayan, 2019, p.73).

Additionally, Law No. 6112 retains the provision from Law No. 3984 prohibiting political parties, associations, unions, professional organizations, cooperatives, foundations, local governments and their affiliates, business partnerships, and financial institutions and organizations from owning media service provider companies. However, with Law No. 6745 (The Law on Supporting Investments on Project Basis and Amending Certain Laws and Decree Laws, 2016), introduced in 2016, this restriction was lifted for foundations. The first effect was the establishment of a new television channel in 2018 by Türkiye Religious Foundation[6] (Türkiye Diyanet Vakfı), affiliated to the Presidency of Religious Affairs.

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4 The Savings Deposit Insurance Fund (SDIF) was established in 1983 within the Central Bank of Türkiye to protect the deposits of depositors. With deposit insurance, depositors know that their deposits will be paid to them even if the bank in which they have deposits goes bankrupt. With the establishment of the Banking Supervision and Regulatory Agency (BRSA) in 1999, the SDIF continued to operate under the BRSA. Especially after the 2001 crisis, many capital owners in the radio and TV sector experienced economic difficulties, especially in the banking sector and other sectors. While regulating the banking sector, the SDIF seized the radio and TV channels owned by these actors in return for their debts. In 2018, after the transition to the Presidential Government System, the SDIF was restructured as the Savings Deposit Insurance Fund Presidency under the presidency with a Presidential Circular.

5 Law No. 6112 Law on the Establishment of Radio and Television Enterprises and Their Media Services, 2011, Article 19/1-d.

6 For related news, see https://t24.com.tr/haber/diyanet-ozel-televizyon-kanali-kurdu,672856

Another feature of Türkiye's liberalized radio and television market is the flow of international capital. Law No. 3984[7], the first law to which RTÜK was subject, limited the share of foreign capital in a private TV or radio company to 20 percent. Türkiye's first foreign-owned television channel, CNN Türk, was founded in 1999 as a fifty-fifty joint venture between Doğan Media Group and Time Warner Group of the United States of America (USA) (Hürriyet, 1999). Because of the 20-percent ownership limit, CNN Türk located its headquarters outside Türkiye. CNN Türk was managed by two companies. One is Doğan Group-owned EKO TV Broadcasting A.Ş., established in accordance with the ownership structure determined by RTÜK; the other is an operating company established abroad to collect, and distribute the company's revenues. RTÜK was informed that Eko TV was the owner of CNN Türk while Time Warner Group had a 20-percent share. Thus, monetary transfers between the two companies could be carried out easily while reducing the portion of channel revenues to be paid to RTÜK (Kadıoğlu, 2001, pp. 66–68). In 2002, the share of foreign capital increased to 25 percent while a new rule was introduced prohibiting foreigners from being partners in more than one media service provider.[8]

In 2005, Doğan Group signed an agreement worth 150 million dollars to transfer 19.99 percent of Doğan TV Radio Broadcasting Corporation's shares to Deutsche Bank (Yeni Şafak, 2005). Meanwhile, Doğan TV Radio Broadcasting Corporation had two national channels, Kanal D and CNN Türk, and 4 cable TV channels and 3 radio channels, including Dream TV Music Channel (Hürriyet, 2005). This share transfer, created an illegal situation as the foreign company became a partner in more than one TV and radio company. RTÜK therefore rejected the share transfer on the grounds that a foreign natural or legal person cannot become a partner in more than one radio and TV institution (Münir, 2005). In 2009, tax inspectors determined that the total foreign capital ratio in 28 media outlets belonging to Doğan Group was 32.48 percent and reported the situation to RTÜK (Haber3, 2009). The investigation also showed that Doğan Group had hidden its foreign partnership structure from RTÜK to avoid the provisions of the foreign capital regulations. RTÜK initially gave Doğan Group three months to correct this illegal situation (Cumhuriyet, 2009), but the three-month period was later extended indefinitely. The then-head of RTÜK declared that the share of foreign capital in many broadcasting companies was over 25 percent while applying the relevant law to Doğan Group, the largest group in the market, would cause chaos. In addition, the head of RTÜK stated that a draft law was being prepared to increase the maximum foreign ownership share to 50 percent, so no warning was necessary for Doğan Media Group to rectify the illegal situation (RTÜK, 2010).

Indeed in 2011 this draft was approved and, Law No. 6112 was implemented, setting the upper limit of foreign capital share at 50 percent.[9] As a result, other actors in the sector who had violated the previous law were not subject to any sanctions. With the new regulation, the number of foreign-capital broadcasting companies, increased to two.[10] The new law also introduced the concept of "indirect partnership"[11], allowing foreign capital to become a partner

7 Law No. 3984 on the Establishment and Broadcasting of Radio and Television, Article 29, Official Gazette publication Date, 20.04.1994 No. 21911.

8 Amendment Law No. 4756 on the Law on Establishment and Broadcasting of Radio and Television, the Press Law, the Income Tax Law and the Corporate Tax Law, Article 13, Official Gazette Publication Date, 21.05.2002 No. 24761.

9 Law No. 6112 on the Establishment of Radio and Television Enterprises, 2011, Article 19/1-f, Official Gazette Publication Date, 03.03.2011, No. 27863.

10 RTÜK Regulation on Implementation Procedures and Principles Regarding Partnerships with Multiple Media Service Providers, Article 6/2, Official Gazette Publication Date 16.11.2011, No. 28144.

11 RTÜK Regulation on Implementation Procedures and Principles Regarding Partnerships with Multiple Media Service Providers, Article 4/1-b defines direct partnership as "A natural or legal person directly holding a share in a media service provider organization without any other legal person in between".

in up to four radio and TV companies through a legal entity in which it owned shares.[12] Thus, the new law encouraged the participation of foreign capital in the sector. In addition, in the case of "indirect partnerships", no explanation was made regarding the 50-percent share limit for foreigners, which left the field ambiguous. Thus, foreign investors could become indirect partners in numerous TV and radio companies.

The main reason for changing the law regarding foreign share ownership was that many media actors already had foreign partnerships that were contrary to the legislation. RTÜK therefore refrained from opposing the actors by terminating these complex partnerships, which would have affected a large part of the sector. Instead of identifying these actors and applying sanctions, RTÜK waited for the contradictions to be eliminated through legal changes. Indeed, the 2010 report of the Presidency State Auditing Board on RTÜK stated that RTÜK had remained passive in sector regulation, especially between 2006 and 2008 (Cumhuriyet, 2010)[13]. Sümer and Adaklı (2007) state that, effective measures to prevent company groups or cartel-like entities from gaining a dominant position in broadcasting were not taken, especially on issues like establishing broadcasting corporations and ownership share limits. By not performing this function, RTÜK was reduced to a censorship institution rather than one that regulates the sector and protects competition. Additionally, the law was not strong enough to force firms to truly comply (Sümer & Adaklı, 2007).

Another area where RTÜK has been pacified by the political power is permissions and frequency allocations. After the 2016 coup attempt, the political power's decision to close down channels under RTÜK's jurisdiction is an example of this. In 2016, 86 radio and television channels belonging to the Gülen sect were closed down by emergency decrees[14].

In 2017, following the Decree Law no 687; the licenses and the frequencies of seized radio and TV channels were transferred to pro-government media groups by RTÜK. In the Decree Law no.687, the term "revive" was used for the transfer and registration of these channels to their new owners. Additionally, the same Decree Law stated that following the completion of the necessary information and documents, the transfer would take place without the need for any further action. This has undermined transparency. In the following process, 35 frequencies belonging to these broadcasting organizations were put up for sale by the SDIF. Later in 2017, Samanyolu TV, Burç FM, Kanaltürk, Kanaltürk Radio, Radio Mehtap, Radio Cihan were bought by Turkuvaz Media, owned by the Kalyon Group, which is close to the government, without a tender by the SDIF (Tartanoğlu, 2017). Although it was determined that the 11 frequencies purchased by Turkuvaz Medya after this sale overlapped with frequencies previously owned by Turkuvaz Medya, which constituted a violation of the legislation, no action was taken by RTÜK. However, in 2019, the deputy head of the Permissions and Allocations Department was dismissed the next day, along with another bureaucrat who served as deputy head of the same department, for attempting to send a warning to Turkuvaz (Bulut, 2019).

[12] RTÜK Regulation on Implementation Procedures and Principles Regarding Partnerships with Multiple Media Service Providers, Article 6/3, Official Gazette Publication Date 16.11.2011, No.28144.

[13] On 15.07.2018, with the Presidential Decree published in the Official Gazette (Presidency, 2018), the State Auditing Board was affiliated to the Presidency and its reports were made inaccessible. Paragraph (1) of Article 18 of the aforementioned decree on the "degree of confidentiality of reports" states that "it is decided by the board whether the reports will be published or not".

[14] Decree Laws 668, 675 and 677.

2.2 Expansion of Media Capital in Other Sectors and Public Procurements

The leading media companies in Türkiye's radio and TV market also have investments in other sectors, as shown in Table 1. Between 1994 and 2011, when Law 6112 was enacted, media owners mostly invested in banking, construction, energy, manufacturing and industry, communication, and tourism. Notably, the top two sectors, communications and energy, were liberalized after 2000.

Table 1

Leading Media Group's Investments in other Sectors in 1994-2011 and 2018-2021

1994-2011	Banking	Leasing and insurance	Marketing, commerce	Construction	Cement	Real estate operations	Communications, Digital	Manufacturing, industry	Trade	Education	Healthcare	Energy, electricity	Tourism	Automotive	Steel	Food and beverage	Lottery	Port management	Transportation and	Mining	Maritime Sector
Rumeli Holding	x				x		x					x									
İhlas Holding	x		x	x		x	x	x	x	x	x		x			x				x	
Doğan Holding	x							x				x	x	x							
Avrupa Holding	x	x																			
Dinç Bilgin- Media Holding	x														x						
Doğuş Holding	x			x		x						x	x	x		x					
Samanyolu Group																					
Beyaz Holding				x				x		x											
Çukurova Holding	x		x	x			x	x				x							x		
Çalık Holding	x			x			x	x				x								x	
Frequency	7	1	2	4	1	2	3	4	1	2	1	4	3	2	1	2	0	0	1	1	0

2018-2021	Banking	Leasing and insurance	Marketing, commerce	Construction	Cement	Real estate operations	Communications, Digital	Manufacturing, industry	Trade	Education	Healthcare	Energy, electricity	Tourism	Automotive	Steel	Food and beverage	Lottery	Port management	Transportation and	Mining	Maritime Sector
Doğuş Holding	x			x		x						x	x	x		x					
Kalyon Group				x		x						x									
Yeşildağ Group				x			x						x			x		x			
Demirören Group			x	x		x	x	x		x			x				x	x			
Beyaz Holding			x										x								
Acun Media			x				x	x		x	x										
Ciner Holding		x	x					x				x	x					x	x	x	x
Frequency	1	1	4	4	0	3	3	3	0	2	1	3	5	1	0	2	1	3	1	1	1

Source: Table compiled by the authors based on data retrieved from the Media Ownership Monitor website, holding companies' official websites, and press reports.

After 2018, when there were major changes in media ownership structure, media companies primarily also invested in tourism, construction, marketing, port management, real estate operations, energy, and manufacturing. Strikingly, these sectors included privatized public enterprises (port management, electricity) or state-subsidized sectors defined as priority areas for government incentives (tourism, energy), or sectors developed through state tenders (construction). According to Article 29 of Law No. 3984, those owning more than 10 percent of a particular private radio and television establishment cannot accept any business from the state or other public legal entity.[15] This article aimed to prevent the shareholders of media establishments adopting a broadcasting policy to please the government to win state tenders. The amendment of 2002, however, completely removed this article.[16] Since then, media company owners have faced no restrictions in bidding for state tenders. The most effective factor behind this amendment had been lobbying by media capital groups led by Doğan Group (Adaklı, 2014, p. 20; Özkök, 2002).

Following this development, significant state tenders were awarded to prominent participants in the media sector. Given the strength of their connections with political power, it is not surprising that Türkiye's media conglomerates have made some of their largest investments in state tenders and privatized public institutions. During the 1980s neoliberal economic policies prioritized privatization, and the program accelerated further during the 2000s. Between 1986 and 2003, the state earned 8.23 billion dollars from privatizations. However, this increased almost eight times to 62.13 billion dollars under the AKP government's privatization program between 2004 and 2020 (Özelleştirme İdaresi Başkanlığı, 2021).

Meanwhile, the Public Procurement Law[17] was enacted in 2002 to make public procurement more transparent, limit arbitrary government interventions, and open tenders to international competition (Buğra & Savaşkan, 2014, p.78). However, this law was amended 113 times between 2003 and 2014 (Oda TV, 2014), and 191 times in total by 2020 (Kaya, 2020). This drew the criticism that laws were being changed to benefit particular groups First, for example, the law largely excluded municipal companies established by local governments in accordance with the Commercial Code and state economic enterprises. Then, sectors with natural monopolies, such as transportation, energy, water, and communications, were excluded from the Public Procurement Law's legal restrictions and state banks were exempted while undergoing privatization. Second, amendments eliminated the Public Procurement Authority from probe any state tender ex officio based on media reports. Instead, an investigation could not be opened unless one of the companies participating in the tender registered a complaint. Additionally, to deter such complaints, complainants faced higher filing charges. Third, the Public Procurement Authority's steering committee structure was altered in 2011 to eliminate private sector representatives, who had previously been involved in decision-making. By limiting decision-making to government-appointed bureaucrats, this amendment effectively ended the institution's autonomy (Buğra & Savaşkan, 2014, pp. 78–81).

Fourth, a provisional article was added in 2005 to the Petroleum Market Law of 2002, which abolished the obligation for natural gas and petroleum related projects to be subject to the Public Procurement Law (Münir, 2008). In addition, most of the tenders are realised based on the Article 21/b of Public Procurement Law No. 4734[18]. Under this article, the tender commission selects a company from among the tenderers rather than announcing an open tender. Article 21/b enables the commission to conduct the tender using the negotiated tendering in unusual or emergency circumstances (Cumhuriyet, 2021; T24, 2020a; Yılmaz, 2019). The tender amount is then determined by bargaining between the public agency that

[15] Law No. 3984 on the Establishment and Broadcasting of Radio and Television, Article 29, Official Gazette publication Date, 20.04.1994 No. 21911.

[16] Amendment Law No. 4756 on the Establishment and Broadcasting of Radio and Television, the Press Law, the Income Tax Law and the Corporate Tax Law, Article 13, Official Gazette Publication Date, 21.05.2002 No. 24761.

[17] Law No. 4734 on the Public Procurement, Official Gazette Publication Date, 22.01.2002, No. 24648.

[18] Law No. 4734 on Public Procurement, Article 21/b: "Tenders can be made by bargaining in the following cases: b) Sudden and unexpected events, such as natural disasters, epidemics, danger of loss of life or property, or that are peculiar in terms of construction technique or the necessity of making the tender urgently in cases determined by the administration in terms of ensuring the security of the property or in the event of unforeseen events by the administration¨.

made the offer and the selected firm, thereby reducing transparency and eliminating competition.

In sum, Türkiye's leading conglomerates in the media sector also have investments in other sectors that have been either liberalized or organized through public tenders. Having good relationships with political power and adopting a broadcasting policy to please it, has enabled these media groups to make profitable investments through public tenders and liberalized sectors. Furthermore, by establishing close political and kinship relations with capitalist fractions, Türkiye's political power has acted almost like a member of the sector and captured the regulatory authority by interfering in its operations to benefit these interest groups.

3. Financial Resources and Budget

Undoubtedly, a key indicator of a regulatory agency's independence is its ability to manage its finances independently. When RTÜK was established in 1994, the law stipulated that RTUK's revenues come from a five-percent deduction from the annual gross advertising revenues of radio and television companies, publication permit and license fees. In addition, funds can be appropriated when necessary, from the budget of the Turkish Grand National Assembly.[19]

Following an amendment in 2002, administrative fines were added to its revenues while revenues gathered from private radio and TV companies' broadcasting permits and licence fees were transferred to the Treasury.[20] In addition, unspent funds from RTÜK's annual budget were transferred to a public bank account on behalf of the Ministry of Culture to protect and restore Turkish cultural and natural assets in the country and abroad.

In 2005, however, a new regulation was introduced to transfer unspent RTUK funds from RTUK's annual budget to the account of the Central Accounting Office of the Ministry of Finance and registered as revenue for the central state budget. Concerning the appropriation issued to the Ministry of Culture, further appropriations were defined as equal to or greater than the amount reported in the previous year's budget.[21] These changes demonstrate the erosion of RTÜK's authority to make decisions about its own revenues and budget surplus.

In addition, a new law stipulated the transfer of their revenues from various autonomous administrative authorities accumulated until the end of June 2005 to the Ministry of Finance's account. These authorities included the Istanbul Stock Exchange, RTUK, the Competition Authority, Capital Markets Board, Banking Regulation and Supervision Agency, Telecommunication Authority, Energy Market Regulatory Authority, Public Procurement Authority, and Tobacco and Alcohol Market Regulatory Authority.[22] Furthermore, the cash surpluses accumulated until 31.12.2005 in the coffers of the aforementioned institutions would be deducted and transferred to the account of the Ministry of Finance according to the principles set forth in the same decree law. The political power's intervention did not end there. Indeed, through an amendment to the Public Financial Management and Control Law in 2005, the quarterly income surpluses of regulatory and supervisory institutions were transferred to

[19] Law No. 3984 on the Establishment and Broadcasting of Radio and Television, Article 12, Official Gazette publication Date, 20.04.1994 No. 21911.

[20] Amendment Law No. 4756 on the Establishment and Broadcasting of Radio and Television, the Press Law, the Income Tax Law and the Corporate Tax Law, Article 12, Official Gazette Publication Date, 21.05.2002 No. 24761.

[21] Law No. 5217 on Special Income and Special Appropriations and some Amendments on other Law and Decrees, Article 8, Official Gazette Publication Date, 23.07.2004, No. 25531.

[22] Law No. 5398 on Making Amendments to the Law on Regulating Privatization Practices and Some other Laws and Decrees. Provisional Article 2. Date, 3.07.2005.

the general budget.[23] These changes demonstrate that the political power had control over the budgets and financial autonomy of many supposedly independent administrative authorities, not only RTÜK.

Article 41 of the new RTÜK Law No. 6112, enacted in 2011, reorganized RTÜK's financial resources and budget. Thereafter, RTUK's revenues were defined as broadcasting licence fees, annual frequency usage fees, broadcast transmission authorization fees, 3 percent deduction taken from monthly gross commercial communication revenues[24] excluding programme sponsorship revenues, and, if required, Treasury aid from the parliament's budget. An important innovation was to determine media service providers separetaly from infrastructure operators that deliver broadcasts to the audience, platform operators, etc. by RTÜK. Under this two-dimensional approach to licensing procedures, broadcast licenses were granted to media service providers whereas broadcast transmission authorization were granted to infrastructure operators and platform operators. A revenue creater effect of this development would be expected if only new law enforcements did not squeeze the RTUK's financial resources.

Table 2

RTÜK's Share of Commercial Communications Income, Millions of TL (2010-2020)

Years	Commercial communication income declared to RTÜK	Expected RTÜK share, %5 before 2011, %3 until 2016, %1,5 after 2016	Realized RTÜK share of commercial income **	% change by year
2010	1,895,701,726,29	94,785,086,31	89,603,485,80	100
2011	2,460,206,657,78	73,806,199,73	61,303,875,17	–32
2012	2,669,785,671,11	80,093,570,13	66,979,572,31	9
2013	3,168,158,347,59	95,044,750,43	89,786,488,36	34
2014	3,172,582,866.57	95,177,485.99	85,654,474.29	–5
2015	3,344,686,444.08	100,340,593.32	94,400,928.42	10
2016	3.697.398.845.80	110,921,965.37	101,847,910.58	8
2017	3,870,700,722.88	58,060,510.84	54,588,721.39	–46
2018	3,808,772,166.43	57,131,582.50	54,225,865.20	–1
2019	4,022,038,159.76	60,330,572.40	50,651,793.67	–7
2020	4,955,412,064.37	74,331,180.97	53,404,868.82	5

Source: Data for 2010 and 2019 were retrieved from RTÜK Department of Administrative and Financial Affairs; data for 2011 and 2012 were retrieved from RTÜK 2012 Activity Report (RTÜK, 2013); data for the other years were retrieved from RTÜK official announcements.

Indeed, due to demands from media companies, Law No. 6112 reduced RTÜK's share of commercial communication revenues from five percent under Law No. 3984[25] to three percent under Law No. 6112[26]. It was further reduced to 1.5 percent in 2016, under another amendment in law No. 6112.[27] Given the fact that this change came in the immediate aftermath of the 2016 coup attempt, this decision can be considered as a "gesture" proposed by the President in response to the national media's defense of democracy during the coup attempt. As a consequent, as Table 2 shows, RTÜK has lost revenues since 2016 (Table 2). For example, its share of commercial communications revenues declined by 32 percent in 2011 and 46 percent

23 Law No. 5018 on Public Fiscal Administration and Control, Article 78, Amended second paragraph: 22/12/2005-5436/10 art.

24 Law No. 6112 includes advertising, program support, tele-shopping, product placement, self-promotion, and new advertising techniques within the scope of commercial communications.

25 Law No. 3984 on the Establishment and Broadcasting of Radio and Television, Article 29, Official Gazette publication Date, 20.04.1994 No. 21911.

26 Law No. 6112 on the Establishment of Radio and Television Enterprises, Article 41/1-ç, Official Gazette Publication Date, 03.03.2011, No. 27863.

27 The phrase "three percent" in Article 41/1-ç of Law No. 6112 was changed to "one and a half percent". The amendment entered into force on September 7, 2016.

in 2016. In short, RTÜK's financial autonomy has been damaged and its revenues have decreased due to the demands of leading media groups and the interests of the political power.

RTÜK Law No. 6112 also requires media service providers to declare their gross commercial communications revenues to RTÜK on a monthly basis.[28] The accuracy of these statements must be confirmed by financial audits carried out by the Ministry of Finance. However, the law gives no clear information about the frequency of these inspections. According to Article 9, Paragraph (1) of RTÜK's Regulation[29], inspections of relevant media service providers are only carried out if RTÜK's Supreme Council requests it from the Ministry of Finance. In practice, RTÜK sends suspicious revenue declarations to the Ministry of Finance in three separate lists each year for further auditing. The first list includes organizations with net sales revenue in their annual balance sheet approved by the Ministry of Finance, although they have declared their commercial communications income to RTÜK as 'zero'. The second list includes organizations that have not declared any revenue from commercial communications to RTÜK. The third list includes organizations that declared extremely small commercial communications revenues despite paying significant administrative fines to RTÜK. To ensure the regulating process is transparent, the Ministry of Finance's audit reports should be made public. However, there is no evidence that this has ever happened.

The distribution of advertising income in the media service provider industry changed radically after Law No. 6112. In 2001, prior to the law, the following companies took over 80 percent of advertising income: Doğan Group (39 percent), Media Holding-Bilgin (19 percent), Çukurova Group-Karamehmet (9 percent), Rumeli Holding-Uzan (6 percent), İhlas (5 percent), Doğuş Group (3 percent), and Aksoy Group (2 percent) (Münir, 2001).

In 2010, Doğan Media again took the biggest share (36 percent), followed by Çalık Group (19 percent), the new owner of ATV, replacing Medya Holding- Bilgin, which had withdrawn from the sector, Çukurova Group-Karamehmet (12 percent), Doğuş Group (8 percent), and Ciner Group (2 percent). Thus, five media groups now took 77 percent of advertising revenue (Sözeri & Güney, 2011) while Avrupa Holding-Aksoy, Rumeli Holding-Uzan, Medya Holding-Bilgin, and İhlas Holding had left the sector[30].

According to the one sector report ever issued by RTÜK, many countries were unable to prevent horizontal, vertical, and cross-concentration trends in the media sector (RTÜK, 2014b). Nevertheless, the report denied that Türkiye faced the same situation.

Although the report did not present the total commercial communications revenue for each company and its affiliated TV companies, it listed the ten television broadcasting companies with the highest commercial communications revenues and their percentage share of the sector's total commercial communications revenues between 2004 and 2013. The leading media groups until 2013 were Doğan Group, Doğuş Group, Turkuvaz Media Group, Çukurova Group-Karamehmet and the global media giant News Corporation owned by Murdoch (RTÜK, 2014b).

[28] Law No. 6112 on the Establishment of Radio and Television Enterprises, Article 41, Official Gazette Publication Date, 03.03.2011, No. 27863.

[29] By-law No. 28037 on the Procedures and Principles Regarding the Audit of Commercial Communication Revenues Obtained by Media Service Provider Organizations and the Declaration and Payment of the Supreme Council Shares to be Taken from These Revenues, dated 26.08.2011. See: https://www.mevzuat.gov.tr/File/GeneratePdf?mevzuatNo=15228&mevzuatTur=KurumVeKurulusYonetmeligi&mevzuatTertip=5

[30] Avrupa Holding-Aksoy in 1999, Rumeli Holding-Uzan in 2004, Medya Holding-Bilgin in 2002, and İhlas Holding in 2007 left the TV sector.

Citing the concerns of media service providers that advertising revenues are trade secrets so public disclosure would harm competition, RTÜK published no further detailed information on their ownership structure or the distribution of commercial communication revenues. Nevertheless, the 2014 report denied that these companies had violated Law No 6112 between 2011 and 2014. That is, no real or legal person had exceeded the legal limit of earning over 30 percent of the sector's total annual commercial communications revenue (RTÜK, 2014b).

Table 3 shows that RTÜK's main source of income, its deductions from commercial communications earnings, has decreased significantly in 2011 and 2016 because of the intervention of the political power decreasing the percent share of RTÜK deducted from commercial income of the media companies. RTÜK's license fee revenues have also fallen, especially since 2015, because of the 2014 amendment allowing media companies – at their insistence – to pay their license fees in 10-year installments (RTÜK, 2016)[31]. Although RTÜK's licensing income has benefited from the growth in applications for internet broadcasting licenses, it remains below the levels of the early 2010s. Due to this continuous overall decline in RTÜK's income, its budget could only cover personnel and current expenses in 2018. Consequently, RTÜK became unable to transfer any revenue to the Ministry of Finance, and instead began receiving treasury help in 2019 (RTÜK, 2020).

Regarding expenditure, Table 4 shows that personnel expenditure was the largest category, followed by current transfers. Apart from staff food and clothing support, and staff refectory service expenses, current transfers mostly comprised income surplus transferred to the Ministry of Finance[32] and the 15-percent share of RTÜK's commercial communication revenues,[33] transferred to the Social Assistance and Solidarity Encouragement Fund.[34] By 2019, together with the decline in commercial communications and licensing fee revenues, the rise in personnel expenditure, state premium spending, goods and services purchases, and capital expenditure were other factors that forced RTÜK to accept treasury support for the first time. As Table 4 shows, current transfers decreased significantly after 2017. In short, the combination of declining licensing fee and commercial communications income reduced RTÜK's transfers to the Ministry of Finance and the Solidarity Encouragement Fund.

One of RTÜK's regulatory activities is administrative sanctions, including fines, suspension of broadcasting rights, removal of programs from the broadcast catalogue, prohibition of penalized program presenters and producers from making programs during a broadcasting ban, suspension of the media service provider's broadcasting rights, and license cancellations[35]. Under Law No. 3984, RTÜK's revenue from sanctions were collected by the Ministry of Finance and registered as revenue for the central state budget whereas RTÜK retained it under Law No. 4756. A few years later, however, Misdemeanor Law No. 5236 stipulated that the administrative sanction revenues of all independent regulatory institutions should be collected by the Ministry of Finance and counted in the central state budget.[36]

[31] Law No. 6552 on Amending the Labor Law and Some Laws and Decisions and Restructuring Some Receivables, Article 135, Dated 10.09.2014.

[32] Law No. 5018 on Public Fiscal Administration And Control, Article 78: "The revenue surplus of the regulatory and supervisory agencies shall be transferred quarterly to the general budget until the fifteenth of the month following each quarter", Official Gazette Publication Date, 24.12.2003, No. 25326.

[33] Law No. 3294, paragraph (f) (Amended: 6/7/1999-4397/7)

[34] One of the extra-budgetary funds within the financial organization of the Republic of Türkiye.

[35] Law No. 6112 on the Establishment of Radio and Television Enterprises, 2011, Article 32, paragraphs (a), (b), (d), (g), (n), (s) and (ş). Official Gazette Publication Date, 03.03.2011, No. 27863.

[36] Law No. 5236 on Misdemeanor, Article 17, Paragf. (3), Official Gazette Publication Date: 31.03.2005, No. 25772.

Table 3
Distribution of RTÜK Revenues (TL), 2010-2020

Years	Share of audiovisual commercial communications revenues	Interest revenues	Share of late fee revenues	Revenues from sales of printed documents, contracts, cds, cassettes	Licence fees	Frequency annual usage fees	Broadcast transmission authorization fees	Other revenues	Treasury aid	Total
2010*	89,603,485.80	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	90,839,346.40
2011	61,303,875.17	674,344.32	3,176,968.97	2,977,482.57	12,694,094.50	26,698,392.82	0.00	0.00	0.00	168,829,033.52
2012	66,979,572.31	1,592,611.85	2,697,712.12	557,772.91	24,038,123.99	33,737,142.90	1,791,158.10	0.00	0.00	131,394,094.18
2013	89,786,488.36	1,313,770.10	4,334,700.19	492,554.41	26,883,239.50	32,805,802.28	3,227,370.81	0.00	0.00	158,843,925.65
2014**	85,654,474.29	1,765,087.20	8,916,450.37	100,527.25	15,223,098.73	26,359,564.20	3,833,061.95	288,918.85	0.00	142,141,182.84
2015	94,400,928.42	1,765,627.62	1,792,714.62	26,324.40	5,236,769.33	35,624,346.88	5,375,709.96	479,224.84	0.00	144,701,646.07
2016	101,847,910.58	1,972,502.32	2,246,526.41	30,251.50	4,417,095.57	36,157,688.84	4,938,143.33	7,651,699.78	0.00	159,261,818.33
2017	54,588,721.39	1,071,596.03	2,231,235.99	62,966.22	7,084,712.13	32,748,462.05	4,826,856.29	4,170,143.05	0.00	106,784,693.15
2018	54,225,865.20	2,197,341.99	379,890.59	85,995.64	3,661,130.37	37,919,103.60	5,539,416.14	577,505.69	0.00	104,586,249.22
2019	50,651,793.67	1,626,707.05	2,502,270.37	33,006.25	6,308,943.50	46,028,163.12	6,219,237.35	839,864.70	40,000,000.00	154,209,986.01
2020	53,404,868.82	29.32	2,444,933.58	17,142.33	7,357,103.44	54,898,427.17	9,761,142.80	1,961,614.13	50,000,000.00	179,845,261.59

Source: RTÜK Annual Activity Reports (RTÜK, 2012; 2013; 2014a; 2015; 2016; 2017; 2018; 2019; 2020; 2021), Budget Revenue Tables
* 2010 data retrieved from 2010 Central Government Final Accounts Bill
** 2014 commercial communication revenue data retrieved from RTÜK 2014 Activity Report (9 months)

Table 4
Distribution of RTÜK's Expenditure Budget (TL), 2011-2020

Years	Personnel Expenditure	State Premiums to Social Security Institutions	Purchases of Goods and Services	Current Transfers	Capital Expenditure	Total Expenditure
2011	26,607,913.44	3,988,351.22	13,593,214.65	52,859,784.93	3,662,774.43	100,712,038.67
2012	31,409,370.44	4,275,621.55	13,907,219.92	92,112,127.78	305,780.63	142,010,120.32
2013	34,424,273.54	4,347,661.54	14,894,795.73	96,880,425.71	193,210.18	150,740,366.70
2014	27,825,736.35	3,966,898.30	12,351,199.08	93,466,408.48	691,869.66	138,302,111.87
2015	36,210,167.57	5,756,055.21	21,936,603.83	80,161,452.89	4,793,967.24	148,858,246.74
2016	41,485,267.69	5,976,434.48	22,465,422.52	91,158,151.53	572,762.20	161,658,038.42
2017	42,786,142.49	5,968,754.19	42,548,528.19	28,161,252.20	2,578,729.37	122,043,406.44
2018	58,707,807.87	8,302,216.02	16,844,579.89	10,794,786.08	6,015,225.59	100,664,615.45
2019	76,562,906.51	10,583,178.90	28,199,251.43	12,779,699.18	11,069,736.15	139,194,772.17
2020	90,373,689.18	12,195,990.54	25,642,189.50	26,928,183.14	26,044,134.13	181,184,186.49

Source: RTÜK Annual Activity Reports, Budget Expenditures Tables, 2011-2020 (RTÜK, 2012; 2013; 2014a; 2015; 2016; 2017; 2018; 2019; 2020; 2021).

Thus, although RTÜK can generate income through its activities, its financial autonomy is weakened because it must transfer income items like sanctions revenues directly to the treasury. Table 5 compares RTÜK's fines issued with the amounts collected by the Ministry of Finance. It shows that RTÜK could not collect the administrative sanctions in the amounts they accrue. Thus, even in 2016 and 2017, when RTÜK's income from fines was quite high, the amount it actually collected was less than half of the total fines imposed.

Table 5

RTÜK Administrative Sanctions (TL), 2013-2020

Years	Accrued administrative sanctions	Collected administrative sanctions
2013	50,983,100.00	5,088,473.59
2014	28,461,280.00	7,093,218.75
2015	25,172,119.00	9,538,198.92
2016	41,195,077.50	19,200,200.40
2017	45,617,800.34	21,436,017.33
2018	37,723,105.40	14,232,073.05
2019	27,568,951.90	2,931,928.90
2020	59,382,126.90	9,154,546.08

Source: RTÜK Activity Reports, 2013-2020.

Another issue is that the penalties imposed by RTÜK appear to be politicized and arbitrary in terms of their content, level, and targeted institutions. More specifically, opposition TV channels receive the most severe sanctions, including suspension of broadcasting and heavy fines. For example, following the Gezi Park protests in 2013, heavy fines were imposed on TV, Halk TV, and Cem TV[37] for broadcasts allegedly "inciting the people to violence" (T24, 2013). Similarly, KRT, Fox TV, Haber Türk, Halk TV, and TELE 1 were fined for not complying with RTÜK's order not to show any fires when many wildfires broke out during the summer of 2021 (BIA News Desk, 2021). Thus, three opposition channels, Halk TV, Tele1, and Fox TV, received the most administrative fines between 2017 and 2020 whereas government-supporting channels received the fewest penalties, namely ATV and A Haber, owned by Turkuvaz Group, TRT 1, the state channel, and Star TV, owned by Doğuş Group (T24, 2020b).

4. Conclusion

The administrative and financial independence of regulatory institutions established to regulate privatized sectors by taking them out of the control and influence of the public authority and political power has been an important topic for public administration and public finance scholars. In this article, we examined the decision processes affecting the ownership structure in Türkiye's radio and TV media sector and the financial independence of its regulator, RTÜK. The findings and discussion presented here supported our thesis that RTÜK has faced both political interference from the political power and pressure to satisfy the needs of leading capital groups in the sector it regulates. Consequently, the various market share limits,

[37] See Decisions numbered 96 (Halk TV); 97 (Ulusal 1 TV); 98 (CEM TV); 99 (EM TV) taken at RTÜK's meeting dated 11.06.2013 and numbered 2013/36. https://www.rtuk.gov.tr/ust-kurul-kararlari.

measures, and regulations regarding partnerships have been unable to prevent concentration in the sector.

As of 2021, the sector is dominated by six large capital groups, five domestic (Demirören Group, Kalyon Group, Doğuş Holding, Acun Medya, and Ciner Group) and one international (News Corporation). These major players all belong to larger conglomerates operating in other sectors and receiving public tenders from the government to varying degrees. Here, a reward mechanism appears to operate whereby broadcasting groups that operate in line with the views of the political power benefit more from these tenders.

Regarding RTÜK’s financial resources and budget, its percentage share of the sector’s commercial communications income, which is one of its most important income items, has been reduced by the interventions of the political power while license fees are now paid in installments as demanded by sector groups. This has rapidly reduced RTÜK annual income. In addition, RTÜK’s budgetary autonomy to determine its revenues has been damaged through legal amendments that force the transfer of budget surpluses and administrative sanction revenues to the central state budget.

As a result, RTÜK has functioned as a passive and operational tool in the design of the ownership structure of the sector due to the frequent legislative changes made by the political power. In other words, the main instrument that changed the media ownership structure was the interventions of the political power in line with the propositions of the "political signaling" theory. In the case of RTÜK in Türkiye, as mentioned above, groups such as Demirören Group and Kalyon Group, which dominate the sector, entered the sector under the patronage and supervision of the political power, and in a way, the power and media capital became intertwined. Again, in terms of budgetary autonomy, frequent legislative amendments have undermined RTÜK's autonomy in terms of both its sources of revenue and how it uses these revenues. Based on all these findings, the theory of capture is insufficient to explain media regulation in Türkiye.

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Özgün Akduran Erol I Design; Drafting; Data collection/analysis; Interpretation of data/findings; Supervising; Critical review; Final approval and accountability. Contribution rate 60%

Yunus Yiğit I Concept/idea; Literature review; Drafting; Data collection/analysis; Final approval and accountability. Contribution rate 40%

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