

Stuck on the Surface: Digitalization Case Studies of Three Local Televisions

Lukas Deni Setiawan
Universitas Atma Jaya Yogyakarta, Yogyakarta, Indonesia
E-mail: deni.setiawan@uajy.ac.id

Abstract. *This research examines television digitalization policies from the perspective of local television broadcasters. Local television has the potential to benefit in the context of digitalization. However, our excessive attention to the centrality of broadcasting continues to threaten the existence and progress of local television. This research uses a qualitative approach with in-depth interview data collection methods. The research informants were broadcasters of three local television stations: Jogja TV (Yogyakarta Special Region/DIY), Tegar TV (Lampung), and Lombok TV (West Nusa Tenggara/NTB), as well as one informant from the Indonesian Local Television Association (ATVLI) management. The results of this study indicate that since the beginning of the digitalization process, the government has not considered the perspectives of local television broadcasters in implementing broadcast digitalization. The fundamental issue of balancing the use of digital broadcasting infrastructure, such as multiplexing equipment, by various parties regarding digitalization still remains. As a result, the continued benefits of broadcast digitalization expected by local television broadcasters are still far from expectations. Therefore, local television broadcasters have not thought far enough to vary and improve the quality of their programs because they are still stuck on these basic problems.*

Keywords: *localism, local television, public service media, television digitalization*

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INTRODUCTION

Indonesia has started analog switch-off (ASO) in November 2022. With the implementation of ASO, analog-based television broadcasts are eliminated and are required to switch to digital broadcasts. Local television broadcasts also experienced the same treatment. This condition raises questions regarding the existence of local television, which has so far been in a secondary position. The highlights of broadcast observers in the last decade show this. The scarcity of local broadcast spectrum due to frequency usage disputes has resulted in the majority of local communities being marginalized (Nugroho et al., 2012). National private television broadcasts are still dominant and have a Jakarta perspective (Rianto et al., 2012). National television broadcasts translate half of Indonesia as Jabodetabek

(Heychael & Wibowo, 2014).

Local content cannot be obtained from national television stations (Takariani, 2013). Most television networks cannot meet the information needs of local communities (Sutika, 2015). The Indonesian Broadcasting Commission (KPI) also needs to improve the quality of local broadcasts because there is a tendency for reruns and broadcast schedules with small audiences, such as early morning (KPI, 2020). In addition, regional broadcasting regulations contain unclear definitions, contradictions and inconsistencies between central and regional regulations. Meanwhile, the number of local television stations that are not affiliated with television networks is limited, local content is very minimal, and the role of local broadcasting regulators is small (Rahayu, 2019).

The position of local television in the midst of the huge dominance of national television stations is the starting point for problems that encourage other problems, namely the sinking of local perspectives in the constellation of these problems. However, this research topic has not received further exploration to provide a comprehensive picture of the intricacies of the problem and in-depth analysis through a localism perspective in the context of television digitalization policy and implementation.

Research topics on television digitalization in Indonesia have revolved around polemics regarding its legal and policy basis (Abdullah, 2020; Budiman, 2020; Herman & Rusadi, 2020; Ismail et al., 2019; Mairita et al., 2021; Maulana, 2020; Nurizar, 2020; Rahayu, 2016; Supadiyanto, 2021). This topic is essential because legal and policy foundations are often the source of problems that hinder or even distort the direction of their implementation. In the context of television digitalization, apart from the formation process, the socialization of regulations and policies regarding digitalization is also often highlighted because it still contains several things that need to be evaluated, especially regarding communication strategies (Harjessi et al., 2019; Mubarak & Adjani, 2018).

Other research highlights the business strategy and competitive landscape in the digital broadcasting sector (Firmiyanti et al., 2019; Mubarak & Adnjani, 2020; Rahayu, 2016; Saudi & Rahmawati, 2023; Sjachro et al., 2022). It is important to note that the readiness of all parties involved in broadcast digitalization needs to be mapped to determine their respective strengths and potential. The parties involved also need to know their point of view to complement the principles of meeting their diverse needs. In the context of broadcast digitalization, several other

studies have tried to raise various points of view and attitudes (Harjessi et al., 2019; Mudjianto, 2014; Wahyuni, 2014).

This research is different because it discusses things that have not been analyzed in depth by the previous studies above. This research examines the perspective of local television broadcasters regarding the policy and implementation of television digitalization. There is no research that focuses on this perspective. This perspective can complement the research results above, both research that discusses legal and policy foundations and research that discusses business strategy and competition topics, because it is worth considering from upstream to downstream the broadcast digitalization process in Indonesia. This becomes even more urgent when this policy still contains polemics on various sides, especially the lack of government support for local television stakeholders.

There are two theoretical frameworks for the local television phenomenon used in this research. The first is localism. This idea of being oriented towards the needs of local communities is the main perspective of this research. Several references in the European and American contexts strengthen this explanation and will be based on and adapted to the Indonesian context. The second theoretical framework is public service media. This idea describes the media's responsibility towards the public, especially in the local scope.

Localism in a policy context can be interpreted as an idea that seeks to serve citizens, cover and report local events, implement local programs, and provide space for community voices in a particular area (Tristani, 1998). In the broadcasting context, what underlies localism is the decentralization of control over the content of broadcast programs. This condition can encourage broadcast media managers to be more responsive to

the needs and interests of citizens in the areas where the media operates (Comer & Wikle, 2013).

Localism is difficult to define so it continues to encourage discussion and reformulation (Cole & Murck, 2007). However, there are two basic definitions to consider: (1) the basis of geographical area, related to the origin of a program and the people who produce it. Policy makers need to decentralize and localize discussions on issues; (2) the basis of the program content, related to the promotion of cultural diversity and increasing the political knowledge of citizens in their respective regions. Program content creation can be based on an assessment of community needs (Napoli, 2001). They enable local television content to contain the essence of everyday life and shape people's memories in the long term (Hutchison, 2021).

This idea, which is oriented towards meeting the needs of local residents, faces various challenges in practice. For example, the lack of clarity and inconsistency between regulations regarding the broadcasting sector issued by the central and regional governments makes it difficult for regulators to evaluate broadcasting practices in the regions (Rahayu, 2019). Meanwhile, the management structure of media ownership operating in the regions influences the amount of local program content (Yanich, 2015). This important finding becomes clear when more and more local media become part of certain media affiliates, thus having the power to reach a wider area. This has long been identified and evaluated (Collins, 1980). In the context of the broadcasting phenomenon in Indonesia, this condition is increasingly complicated and complex when broadcast media, especially television, still allows broadcasting on a national scale.

This idea emerged amidst the tug-of-war of various interests considering that

servicing public needs must deal with the commercial needs of the media (Collins, 1980). It's hard to deny because both are guaranteed by law. The media often prioritizes the need to generate profits and reduces their orientation towards serving public needs. Commercial media income is directly proportional to the increase in the number of detected audiences. If profit orientation strengthens, there will be less competition for creative journalism. This had a significant impact on local programming broadcasts (Collins, 1980).

In the context of local media, program evaluation can be carried out in more detail and comprehensively (Braman, 2007). The aim is to discuss the progress of local media from various perspectives and orientations. For example, matters regarding local broadcast programs can be seen both from a regulatory perspective and from a management perspective. Media managers can also pay attention not only to various program genres but also to locally oriented content.

Meanwhile, public service media is a type of media that not only operates by producing and providing content, but also acts as a cultural institution in society that makes a special contribution to the socio-cultural problems of citizens. This cultural institution provides space for crucial research and development activities regarding citizen problems. It can act as a companion and a comparison for commercially oriented media. Even so, this type of media cannot be separated from commercial aspects and must still consider the number of audiences and the values agreed upon by the citizens it serves (Hutchinson, 2017). However, local programs in certain areas can also provide content originating from other areas nearby (Bogaerts, 2017).

The idea of localism and public service media is the basis for the author in identifying phenomena and collecting

data, as well as being material for the author in conducting dialogue on the data that has been collected and reduced. The derivative concepts that emerge in these two ideas deepen the author's analysis of the perspectives of local television broadcasters, especially in responding to the policy and implementation of television digitalization in Indonesia.

The several points above help the author answer the question: how do local television broadcasters view the digitalization of television in Indonesia? This research aims to explain the implementation of television digitalization in Indonesia from the perspective of local television station broadcasters.

METHODS

This research uses a qualitative approach with a case study method. This approach can accommodate new points of view from a phenomenon (Creswell, 2015). In addition, there are opportunities for accommodation to localities and particular characteristics that are not experienced or occur in other phenomena (Denzin & Lincoln, 2009). A purposive sampling approach helps to select the informants. It is often used to understand central issues - in this context, it was a case study of television digitalization policy and implementation.

The data collection techniques for this research are in-depth interviews and literature/document studies. This research data comes from three informants. They are part of the decision makers at every local private television station they manage. The three television stations are Jogja TV (Special Region of Yogyakarta/DIY), Tegar TV (Lampung), and Lombok TV (West Nusa Tenggara/NTB). Another informant whose information supports the completeness of this research data is the leader of the Indonesian Local Television Association (ATVLI).

Jogja TV has a long history of

operating as a local television in DIY. DIY already has regional regulations (Perda) on broadcasting, namely Regional Regulation Number 13 of 2016 concerning Broadcasting Operations. Tegar TV was chosen for the same reason because its operating area already has its own regional broadcasting regulations, namely Lampung Province Regional Regulation Number 10 of 2015 concerning the Implementation of Television Broadcasting in the Region. Regional regulations regarding broadcasting in each region show the seriousness of the regional government in encouraging and ensuring the existence and activities of local broadcast media under its auspices.

Meanwhile, Lombok TV is making serious efforts to address the broadcast digitalization policy to the point of filing a lawsuit or judicial review against Government Regulation (PP) Number 46 of 2021 concerning Post, Telecommunications and Broadcasting. This judicial review challenged articles relating to the multiplexing policy that were considered problematic. These articles are considered not having a legal basis, especially the legal basis in the Broadcasting Law and Job Creation Law, and do not favor local television broadcasters.

The documents used in this research are laws and regulations relating to broadcasting, especially the Broadcasting Law, the Job Creation Act, government regulations and other policies regarding the digitalization of television in Indonesia, journal articles and books relevant to the topic, as well as news related to preparation, planning and implementation of broadcast digitalization programs in Indonesia.

RESULTS AND DISCUSSION

The interviews took place in August-November 2022 with four informants. The informants are: Informant 1, Chief

Editor of Jogja TV (DIY) (August 12, 2022); Informant 2, Production/Program Lead of Tegar TV (Lampung) (October 11, 2022); Informant 3, Director of Lombok TV (NTB) (November 30, 2022); Informant 4, General Chairperson of ATVLI (November 17, 2022).

Interview data is organized into several categories based on subtopics that stand out from the informant's answers. Direct quotations provide emphasis and originality to research data, as well as in the form of paraphrases. Meanwhile, the findings of the literature/document study provide an overview of the relationship between data from different retrieval techniques. This is also a triangulation effort carried out by the author. Literature studies also provide in-depth analysis in the discussion section.

New Hope on New Technology

On the one hand, policies' implementation regarding the digitalization of broadcasting, especially in the television sector, has received a positive response from local broadcasters. Informant 2 stated this through his highlights regarding opportunities for local content creators, the technical advantages of digital broadcasting compared to analog, and the optimization of digital broadcasting channels.

“The presence of digitalization provides opportunities for local content creators to work so that television content becomes more diverse. Audiences are getting closer because they have the privilege of enjoying the clean, clear, and sophisticated program. The color sharpness of the image will also be perfect, and can even be captured in high definition quality (HD) 1028 resolution. In practical terms, digitalization is a solution to overcome the limitations and inefficiencies of analog

broadcasting.” (Informant 2)

In line with Informant 3's statement. Informant 3 assessed that television digitalization was “very good and must be implemented immediately” (Informant 3). This statement implies that digitalization of television has many benefits for the parties involved, including television station managers and their audiences. Therefore, it is best to implement it immediately.

Meanwhile, Informant 4 gave a special note indicating that technological developments in the broadcasting sector encouraged the continued implementation of television digitalization and made it an innovation that was difficult to resist and that this new technology indeed brought advantages compared to the previous broadcasting system.

“ATVLI does not reject the digitalization of the broadcasting system in Indonesia because technology is an inevitability that we cannot avoid ... local television potential development in changing to the digital system can occur because the quality is better than the analog system.” (Informant 4)

A similar view also emerged from Informant 1 who realized that there were new opportunities from implementing broadcast digitalization, even though his television station was not in ideal conditions when it came to facing this new policy. Informant 1 is optimistic that digitalization will change the unequal conditions between local television and other television stations with a national broadcast scale.

“When the government decided on ASO in 2022, we felt we were pressed for time. We know that economic conditions in the last two years have been difficult. Our conditions as local television are also difficult.

Whether we like it or not, we have to run it because we consider this a new business opportunity. Seventeen years of being a local television with conditions like this, with the presence of this new business opportunity, we are no longer secondary television...our position is the same as the others.” (Informant 1)

In particular, Informant 1 added opportunities from implementing digitalization. The opportunity lies in the distribution of advertising revenue. So far, most of the advertisements displayed by the television station managed by Informant 1 come from the government, such as “socialization carried out by the government”. Now their business space is more open because digitalization means their program showcase has the same position in front of the audience and potential advertisers or sponsors.

“For example, if we use Viva MUX, we will see the same display as TVOne or Metro TV. In the past, many clients thought, ‘Wow, Jogja TV is a bit blurry’, now the picture is clearer. That’s what I mean as the business space will open and we will have the same position.” (Informant 1)

It is strengthened by the hope that the ideal digitalization implementation policies will impact local televisions with their particular characteristics, which is its orientation towards the information needs of local communities.

“At the beginning of the meeting on digitalization, our optimism was quite high. The public views regional broadcasts from the perspective of local wisdom. This means that when talking about regional-based digital broadcasts, Jogja TV has differences in local content. “I,

who handles the news sector, do not show news on national issues because, based on the audience’s response, they are more interested in local, regional, close and human interest news.” (Informant 1)

However, the informants also realized that digitalization demands more attention from the parties involved. This confession contains the informants’ hopes regarding the superiority of the technical quality of digital systems compared to analogue. Digital systems can increase the number of broadcasts on certain channels. Now, one frequency can be used for up to 12 channels. This also means wider opportunities for local private parties to own or utilize it. Apart from that, the potential for diversity in television station ownership is increasingly open.

Table 1 shows the positive nuance responses from the informants. They consider that digital technology can bring new opportunities and potential for local television broadcasters. They have observed the existence of this new technology for the continuity of their institutional activities. This response raises new hopes for local television broadcasters and increases optimism about achieving changes in conditions that have not been favorable for them.

Digitalization provides an opportunity to decentralize control of television program management to local television station managers. This gives hope for diversity of ownership and content. The technical advantages are real. The picture and sound of digital television are clear and stable. This provides an initial path for local television to obtain a fairer broadcasting atmosphere and business competition.

These conditions support localism, which stands for decentralized control over broadcast program content, and encourage broadcast media managers in

TABLE 1. Local Broadcasters' Perspectives on Digital Technology

	Positive Responses	New Hope
Informant 1	<ul style="list-style-type: none"> - new opportunities from the implementation - program showcase has the same position in front of viewers and potential advertisers or sponsors - opportunities for local content creators 	<ul style="list-style-type: none"> - will change the condition of inequality between local and national television - Business opportunities is more open - optimization of digital channels
Informant 2	<ul style="list-style-type: none"> - technical advantages compared to the analog system 	
Informant 3	<ul style="list-style-type: none"> - contains many benefits for the parties - an innovation that was difficult to reject 	<ul style="list-style-type: none"> - must be implemented immediately - local television potential will change
Informant 4	<ul style="list-style-type: none"> - brought advantages compared to the previous system 	

Source: Primary Data (2022)

local areas to become more oriented and responsive to the needs and interests of citizens in areas where the media operates (Comer & Wikle, 2013). Since 1998, we have been exposed to various new laws, such as Broadcasting Law Number 32 of 2002, which decentralize this control. This paves the way for a network broadcasting system that provides equal frequency control in regions so that program management can fall under the authority of television stations in that region. Broadcasts involving local issues receive more portions. However, more than 20 years later, we have not yet been able to make network television stations our primary broadcasting system.

These problems set a bad precedent for our broadcasting because we easily accept them and take them for granted. In conditions like these, digitalization should be a new milestone in entering the decentralization of control. It is very important to promote the technical advantages of digital systems, but digitalization should not only focus on

technical matters. Technical excellence is only the tip of the iceberg, especially for Indonesia and its pluralistic society. Guarantees of decentralization and equal opportunity to control frequencies should also be important issues. If not, then almost the same conditions as during the analog system will continue to occur in this era of digitalization. It has eliminated the new hopes that local television stations have had for years to be more empowered in their regions.

Napoli (2001) emphasizes the importance of decentralizing ownership and management of local content by local broadcasters by stating that one of the bases for defining localism is the geographical aspect. If the guarantee of fair competition is maintained by all parties, the ownership and management of programs by local people will become stable and adequate. It is not only in terms of diversity but also quality of the substance. This can be a supporting requirement for local television stations to approach their audiences and assess

the audience's needs first before determining their program. According to Napoli (2001), this assessment can lead to programs relevant to promoting cultural diversity and increasing citizens' knowledge regarding various political issues in their respective regions.

Local media content has a great opportunity to support regional potential growth and encourage the democratization of broadcasting. The results of observations by various parties in various countries show the power of local media content in a socio-political-cultural context. For example, (1) local media can increase the political participation of citizens in their area (Barthel et al., 2016); (2) local media provides a counter narrative to the dominant narrative (Radcliffe, 2018); (3) the existence of local media can be a good neighbor, such as caring for the community, covering citizens and groups, understanding local communities, and offering solutions to problems (Poindexter et al., 2006; Tabroni, 2018; Setiawan et al., 2021) ; (4) local media promises more points of view and perspectives (Scott, 2018); and (5) local media has great potential to encourage skills development and training activities for local media workers (Hastjarjo, 2017).

Furthermore, Hutchison (2021) also emphasized that those conditions open up great opportunities for local television content to mix with the essence of daily life in a familiar environment. This helps shape people's memories in the long term. The informants' optimism regarding the presence of digital technology encouraged the government to consider policies oriented towards the benefit of local television stations. This optimism can be read as the hope of local television stations that conditions will be better than when they broadcast analogue broadcasts. The dominance of television broadcasts operating on a national scale or coverage,

even since the 2002 Broadcasting Law, does not indicate a government policy bias towards local television broadcasters. Naturally, their hopes for the potential of digital broadcasting are soaring.

Other Consequences and Legal Certainty

On the other hand, the migration of analog to digital systems brings up a new crucial infrastructure called multiplexing devices (MUX). This device allows infrastructure sharing that enables host joint broadcasts on up to 12 channels. According to the Ministry of Communication and Information (Kominfo), the infrastructure used is Digital Video Broadcasting-Second Generation Terrestrial (DVB-T2) equipment which can be more effective and efficient (Kominfo, 2021).

This also received attention from research informants. Informant 4 stated that its existence created new problems that had to be faced by operators of local television stations that had previously operated. This problem is not easy to overcome because it is related to one of the crucial elements of local television broadcasts: capital or investment.

“New problems will arise, especially regarding the investment or capital previously spent by local television. It is a large amount of money and it's useless because it cannot be used when the digital broadcasting system is running ... there will be many local television stations that will not be able to pay MUX rentals to digital television broadcast organizers.” (Informant 4)

This is one of the results of monitoring by ATVLI, an institution managed by Informant 4. ATVLI has at least 70 members spread throughout Indonesia. According to information from

Informant 4, they always communicate regularly regarding developments in broadcast digitalization. Many notes and obstacles emerged from their observations of each local television, especially regarding the impact of implementing broadcast digitalization (Informant 4). Apart from that, informant 1 stated that analog to digital migration requires a large budget, especially considering the MUX rental and other facilities. So, they have to collect money before migrating.

Another statement came from Informant 2 who also considered other consequences of the new system. Informant 2 sees it from the perspective of local television station managers who inevitably have to take a portion of revenue from advertising.

“If you do the calculations, implementing multicasting in the broadcasting system will have fatal consequences for local stations and communities. In analog, it is difficult for the television industry outside Jakarta to survive. (Local and community stations) that are still operating have to fight with the national broadcasting industry to get an advertising revenue that is getting smaller with the increase in competitors.” (Informant 2)

The problem of dividing advertising revenue is also an impact of the network broadcasting system that is not yet implemented. The implication is that local television stations must compete in unfavorable conditions with national television stations. Differences in broadcast reach are a serious consideration for advertisers calculating potential audience numbers.

In particular, the condition of implementing television digitalization in NTB received deep concern from Informant 3. Monitoring results show that the transition to a digital system

is progressing slowly because only infrastructure has been built without any digital broadcast receivers in the community. If conditions stagnate while migration continues, local television stations in NTB will die because there will be no viewers (Informant 3).

On the other hand, analog to digital migration also requires a strong legal basis because it impacts many parties with a wide area coverage (all of Indonesia). This received special attention and pressure from several informants in this research. According to them, legal uncertainty in several aspects of the migration process negates the protection and guarantee of the continuity of the local television business.

“Regulations regarding digitalization are still unable to meet the desires of the market and television broadcasting business actors, including investment and legal protection for local television.” (Informant 4)

Meanwhile, Informant 3, who specifically highlighted legal certainty regarding the MUX policy, challenged Government Regulation (PP) Number 46 of 2021 concerning Post, Telecommunications, and Broadcasting by submitting a request for judicial review of the PP to the Supreme Court (MA). The Supreme Court through Supreme Court Decision Number 40 P/HUM/2022, July 28, 2022, partially granted the request for material review. PP Number 46 of 2021 Article 81 point 1, “LPP, LPS, and/or LPK provides broadcast program services by renting multiplexing slots to multiplexing operators”, is declared contrary to higher legislation and has no binding legal force (Supreme Court Decision Number 40 P/HUM/2022, 2022).

“Investors in the television business no longer want to rent because the potential and legal certainty are

unclear ... LombokTV does not want to rent multiplexes because according to the Supreme Court's mandate, multiplexing rentals have no legal basis." (Informant 3)

However, on the other hand, Kominfo emphasized that the Supreme Court's decision does not necessarily cancel the government's policy to continue the migration of analogue to digital television operations. According to Kominfo, the implementation of this migration is in accordance with the law, especially Law Number 11 of 2020 concerning Job Creation which mandates the termination of terrestrial broadcasting (ASO) no later than 2 November 2022 (Kominfo, 2022). The polemic on legal certainty regarding the implementation of digitalization policies shows the lack of legal guarantees in favor of local television station broadcasters.

Table 2 shows that the policy of implementing digitalization using new infrastructure has caused worrying consequences and further problems. The relationship between this problem and the ability of local television to provide sufficient capital makes it even more problematic. Legal uncertainty in its implementation also complicates the obstacles because several informants emphasized that the legal basis does not

support the continuity of broadcasting at the local level.

The idea of localism grew in the context of competition and discourse struggles, one of which involved a tension between the orientation of public service and the commercial interests of the media (Collins, 1980). Frequencies that we all realize are in the public domain have long been the target of various interested parties in the economic and political fields. So, the true meaning of the existence of broadcast media also has a marginalized socio-cultural function. Digitalization in Indonesia cannot be separated from conflicts of interest of various parties. The comfort and stability of broadcast media companies that have controlled air time on a national scale means that they do not easily give up and share the advertising portion or profits with local television stations that have the potential to grow. If local television stations are owned and managed by local entrepreneurs and professionals, then the television business at the local level will be even more attractive and can also be enjoyed by supporting business managers, such as local production houses.

If local media become empowered by the business, their financing activities become an integral part of their independent and professional management. We need to increase awareness of this condition

TABLE 2. Local Broadcasters' Perspectives on the Other Consequences

	New Infrastructure (MUX)	Legal Uncertainty
Informant 1	- migration requires a large budget for MUX rental and other facilities	
Informant 2	- multicasting will have fatal consequences for local stations	
Informant 3	- the infrastructure developed without digital broadcast receivers	- multiplexing rentals have no legal basis
Informant 4	- its existence creates new problems - capital or investment-related	- negates protection and guarantees for the local television business

Source: Primary Data (2022)

because the experience of several local media in some Indonesian regions, such as Bali and Yogyakarta, has shown the opposite. The difficult situation resulting from the pandemic has made several local media dependent on regional government budget revenues (Anggaran Pendapatan dan Belanja Daerah/APBD). It puts local media in a difficult situation, unable to move, thereby weakening their watchdog function. This condition led to a public communication crisis in those areas (Rianto et al., 2023).

The government's concern for the empirical conditions of each local television station is also questionable. The data findings show that the informants identified themselves as being in a difficult situation with digitalization. This can be seen through the policy regarding MUX. Previously, when they still used an analog system, many local television stations had difficulty running their transmitter towers. They try to do this by paying installments over various periods, which can be 5 to 10 years. What they were trying to do without government assistance could be a useless facility because they will no longer use analog transmitters once they migrate to a digital system. The facilities they have worked hard to produce themselves will be replaced by renting MUX from the company authorized to manage them. So, amidst the tension of competition and the struggles of various parties, who does the government care about?

Meanwhile, Rahayu (2019) highlighted the inconsistency of regulations in the broadcasting sector between the central and regional governments. This has the impact of making it difficult for regulators to evaluate broadcasting practices in the regions. These inconsistent regulations indicate that the central government does not meet regional perspectives. An evaluation of the new regulations issued

by the government regarding analog to digital migration needs to be carried out because the challenges to several things contained therein are so fundamental that the Supreme Court has granted several material reviews.

The concept of public service media shows sharper criticism in conditions like this. (Braman, 2007), who pays great attention to the evaluation of local broadcast programs, states that local television activities require evaluation from many points of view and orientation, not only regarding broadcasting regulations and regulators but also involving management methods and interaction with the needs of the audience served. This implies that the completion of local broadcasting infrastructure reduces the burden on local television managers who have many social responsibilities towards their viewers. The central government needs to review its understanding of the actors' local perspective in the broadcasting sector.

The informants stated that the complexity of the digital television infrastructure hampered them, making it difficult for them to discuss strategies and plans for managing the content of their television programs when migrating to digital. The initial migration problems they faced were enough to make it difficult for them to move forward. Hopes that digitalization could provide wider space and opportunities were dashed before they could develop. The persistence of one informant in ensuring the continuity of his television station, even by challenging the digitalization regulations to the Supreme Court, proves that even in a difficult situation, they are still working hard to relieve this pressure through the right channels. This indicates there is a crucial problem.

Public service media assumes media closeness to its audiences, and

we hope that the digitalization process can facilitate this need. Viewers who tend to want local broadcasts rather than national broadcasts show that local television stations receive more attention from viewers. Attention management like this increasingly places the media as the property of the audience so that the media can do further things with the audience, for example carrying out research and development to find solutions to the problems of residents in the areas where the media operates (Hutchinson, 2017). If surrounding areas also have strong local television, they can exchange programs that address each other's issues with a local perspective and learn from each other (Bogaerts, 2017).

We can see that fair access to digital broadcasting infrastructure is the main thing and receives special attention from local broadcasting institutions because they realize that this is the backbone of their services to the information needs of the people in the areas where they operate. Meanwhile, central government regulations and policies that do not accommodate the hopes and concerns of local television managers are the basis for determining access to this infrastructure. So far, the localism perspective shows that the dream of diversity and quality of local content was hampered from the beginning of the digitalization process, namely when government policy did not provide open and decentralized access to new technological infrastructure for local television actors.

CONCLUSION

This research concludes that local television broadcasters view the implementation of analog-to-digital migration as a technological inevitability and place high hopes on it. They realize that the digital technology used requires infrastructure with multiplexing devices. However, they view the policy regarding

multiplexing as problematic and not in their favor. The implementation is stuck on the surface. Even that surface is still tricky. Therefore, other expectations of digitalization, such as sociocultural considerations, cannot be adequately addressed.

This impartiality has an impact on the uncertain position of local television broadcasting institutions. Hopes of balanced competition have not been proven. So far, digital technology is not easy to obtain. Decentralization of management control and more local program management ultimately finds it difficult to gain encouragement from the ease and benefits of using digital technology. If access to infrastructure is unequal, then further benefits will be far from being realized.

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