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TABLE OF CONTENTS:

P. 04 **Artificial Intelligence and Media in China and the U.S.**

Mariano Varesano, Fabiana Caterina Zuccarello

P.23 **Comfort Women: a comparison of Japanese and Korean newspapers' view**

Lucilla Amerini, Rimi Kanaya



Artificial Intelligence and Media in China and the U.S.

Mariano Varesano, Fabiana Caterina Zuccarello

When exploring the impact of technological developments on a nation's media and the public arena, few innovations wield as profoundly disruptive an effect as Artificial Intelligence (AI). This impact is not to be intended as potentially taking place in a distant future; AI is already exerting a profound influence on the media (and society at large) everywhere in the world. While AI is a wide set of different technologies (with no universally accepted definition) (L. Floridi, 2022 p. 39) , this paper takes into consideration two of the most relevant ones in the context of their influence on media landscapes, namely 1) algorithms for selecting and recommending content on search engines and social media, and, more recently, 2) tools for generating and modifying texts and images.

This paper explores how AI's impact on media differs in China and the U.S. The method for conducting this research is reviewing the available literature concerning 1) the adoption of AI tools in the production and distribution of content on the media (both "traditional" and "new" media), and 2) the two countries' approaches to AI governance. Two theoretical assumptions justify the latter choice. First, following Acemoglu and Johnson (Acemoglu & Johnson, 2023), we assume that the most relevant socio-political impact of any technological advancement is determined by the political choices made for governing it, rather than by the inherent characteristics of the technology itself. In other words, there is no good or bad technology, only wisely or poorly driven innovation.

Second, we adopt simplified models of AI governance approaches in the U.S. and China; the first will be described as more market-driven, while the latter is considered to be more state- drive (Hine & Floridi, 2022). In the first model, the application of AI on media and the consequent influence on society are determined by the most profitable options that the tech companies can find. The gathering of enormous amounts of data through social media platforms and search engines to

fuel the business model centered on targeted advertising is probably the most notable example of this approach (Acemoglu & Johnson, 2023, p. 339). The second model encompasses centralized planning of AI applications at the government level, followed by a step-by-step implementation by local authorities and designed “national champions” enterprises (Roberts et al., 2021). These are simplified theoretical models describing the general approach of the two countries to AI governance. While some further complexities and nuances will be examined in the following sections, this distinction is useful for exploring how the impact of AI on the media system differs when adopting the two models. This assumption leads us to analyze more deeply the choices of private actors when considering the U.S., while focusing on the choices of the central government when considering China.

In light of the two assumptions presented above, our research question can be specified as follows: how do the different approaches to AI governance in the U.S. and China change the impact of this technology on the media systems of the two countries? Our research offers mixed results: the two approaches generate significant differences, but also extensive similarities. The main differences are observed in the field of misinformation and societal polarization. In a market-driven context like the U.S., the business models of the main media platforms tend to create an algorithmic incentive toward the creation and spread of extremist, misinforming, and polarizing content (Ruiz, 2023; Acemoglu & Johnson, 2023, p. 339). A state-driven approach like the Chinese one, on the other hand, gives more control over the main media platforms and fewer legal and practical constraints to limiting the spread of misinformation – at least as defined by the government. The argument is not that the Chinese infosphere inherently experiences fewer issues related to misinformation and polarization, but that Chinese authorities possess more tools to potentially mitigate the creation and spread of content they deem misleading or polarizing. The main similarities between the two models were found in the practical use of AI in newsrooms and the general quality of journalistic production: AI is used in similar ways in the two countries, and in both cases, it generally contributes more to the efficiency and quantity of the production than its quality (Simon, 2024; Jiang et al., 2023). Moreover, in both countries the use of generative AI poses questions about intellectual property rights protection and copyright infringement. Other differences and similarities will be explored in the next sections.

This paper is structured as follows. The first part explores the application of AI in the media in the U.S., its implications on the news media's business model, and the consequent effects on the wider society and public arena. The second part focuses on China, its general approach to AI development, and the specificities of AI applications to both Chinese traditional media and "We-media" (Weibo and WeChat). In the conclusions, we synthesize the findings from both parts, highlighting key similarities and differences between the U.S. and China in terms of AI adoption in media.

THE INTEGRATION OF AI IN THE U.S. MEDIA LANDSCAPE

HOW AND WHY USING AI IN TRADITIONAL MEDIA

AI has thoroughly revolutionized the news media organization. Newsrooms had to adapt to the changes brought by this technological innovation, which impacted both the functions the journalists traditionally held, and the methods they used, causing a permanent shift in the news media production's landscape. AI yielded an array of opportunities, such as more efficiency in producing and delivering news (Simon, 2024, p. 3) to consumers, augmented user experience through the personalization of content (Chan-Olmsted, 2019, pp. 197-198), and speed in reporting last-minute news (Murphy, 2024). The functions for which AI is most frequently employed fall under six broad categories: 1) automation of routine tasks that require no specific expertise, such as speech recognition (Chan-Olmsted, 2019, p. 195), transcription, and simple translations; 2) use of analytical tools for intercepting the audience's preferences (Noain-Sánchez, 2022, p. 111) and optimizing the content accordingly; 3) faster fact-checking (Trattner, Jannach, Motta, et al., 2022, p. 589) of the sources; 4) news and trends detection (Tejedor & Vila, 2021, p. 832) to monitor new information; 5) data mining (i.e. filtering huge masses of data to find the most relevant information); and, 6) news dissemination (Kotenidis & Veglis, 2021, p. 244).

The topics on which news media companies employ automated production the most are those that can be serialized (Tejedor & Vila, 2021, p. 832) and for which there is structured data, which is easier to automate. This is the case with sports results, financial news, weather forecasts (Noain-Sánchez, 2022, p. 105), and elections, where the acquired data is easily convertible into informative texts that follow predetermined templates (Chan-Olmsted, 2019, p. 205).

A case in point is the use of this function by the New York Times, the Washington Post, and news agencies such as the Associated Press and Reuters (Peña-Fernández, Meso Ayerdi, Ureta, & Díaz Noci, 2023, p. 3). Associated Press, for example, in its partnership with Automated Insight, developed the AI program Wordsmith (Owsley & Greenwood, 2022, p. 418) for information gathering, the production of brief articles, news distribution, image recognition, and real-time transcriptions (Shafer, 2024). In 2016, the Associated Press automated the coverage of 124 school districts, while the Washington Post published 850 automated articles (De Lima-Santos & Ceron, 2022, p. 22).

The main reason behind the use of AI in the creation and distribution of news is the willingness to cover multiple topics whilst diminishing the costs, in an attempt to respond to the audience's efficiency expectations (Chan-Olmsted, 2019, pp. 207–209). Indeed, AI can be used to learn about consumers' preferences, analyze aggregated data in a shorter amount of time, and quickly check the articles before publishing them (Chan-Olmsted, 2019, pp. 204).

THE RISKS OF USING AI IN NEWS MEDIA

This promise of efficiency, however, is counter-balanced by significant risks. For example, while AI can be used to contrast deepfakes and detect biased and impartial coverage of events, it can also contribute to creating them in the first place (Noain-Sánchez, 2022, p. 116). The use of AI can also raise questions regarding transparency (Helberger, Van Drunen, Eskens, Bastian, & Moeller, 2020, p. 28) and intellectual property protection (Murphy, 2024). The first question is known as the problem of the “black box”, which refers to the inexplicability of the “decisions” taken by complex algorithms. The second problem is likely to be the most concerning for professional journalists: datasets for the training of large language models (LLMs) like ChatGPT include copyright-protected news articles, yet the journalists who wrote them are not always compensated for their use in training the models (Crawford & Schultz, 2024). The situation is further complicated by the fact that the output produced by LLMs is not identical to the initial articles in the dataset, but slightly modified. The issue of intellectual property rights is already a subject of legal battles in the U.S. (Grynbaum & Mac, 2023).

As we show below, the decision to bring to court the case to protect the copyright may inadvertently widen the divide between news organizations that can afford lengthy and expensive trials and those that cannot.[1]

Furthermore, asking for payment in return for access to complete newspaper archives—a common agreement between news media corporations and AI companies—can also pose problems. Many observers (Lessin, 2024; IIPost, 2024) believe that such agreements favor AI companies disproportionately in the long term and contribute to the devaluation of a newspaper’s most valuable asset: its content (IIPost, 2024).

When applied to social media platforms, AI is believed to pose an unprecedented challenge to the centrality of traditional media’s role in the information landscape (Helberger, Van Drunen, Eskens, Bastian, & Moeller, 2020, p. 7). This causes problems that are existential to traditional media outlets, since their very economic sustainability is at stake: the growing position tech companies have assumed as information providers (what is known as “platformization” of information) (Radsch, 2024) forced the “old media” to adapt by modifying their business model, making it more similar to the ad-based model of social media. The new media business model based on digital advertising, data training, and the personalization of content enhances the forecasting capacity of some media firms, with the risk of broadening the gap between large corporations with funds and talents to invest and smaller-size outlets, which do not have such possibilities (Helberger, Van Drunen, Eskens, Bastian, & Moeller, 2020, p. 21).

A QUESTION OF POWER RELATIONS (AND THE FUNCTIONING OF DEMOCRACY)

The growing reliance on tech companies for access to cutting-edge AI systems and their use in journalists’ daily working routines have already altered the bargaining position of the so-called “Big Tech” in the newsrooms. Companies like Alphabet (owner of Google and YouTube, among others), Meta (owner of Facebook, Instagram and WhatsApp), and OpenAI (the developer of ChatGPT, heavily funded by Microsoft) wield significant power, effectively gatekeeping access to technologies and platforms that have become essential to news production and distribution.

1. We can mention the example of the New York Times which in September 2023 brought to court OpenAI for using copyright material

In recent years, “Big Tech” companies and the most important news outlets have tried to settle these imbalances using both the “stick” (lawsuits) and the “carrot” (economic agreements). These litigations and negotiations tackle both the use of algorithms to distribute journalistic content and the use of AI to produce the same content: in the first instance, news outlets ask compensation for the distribution of their content on Google, Meta, or Apple services (which yields revenues to the respective companies through advertising) (Mateen et al., 2024; The Guardian, 2024). In the second instance, news media ask for compensation for the use of their copyright-protected material for training LLMs like ChatGPT (Grynbaum & Mac, 2023) [2].

One undesired consequence of these deals is empowering big news companies whilst challenging the monetization opportunities of small-size newspapers, whose resources are limited (Jungherr & Schroeder, 2023, p. 168). Access to technology and training data becomes a competitive asset (Helberger, Van Drunen, Eskens, Bastian, & Moeller, 2020, p. 25), and while big news companies can invest in research and development of new types of AI in-house and negotiate prices and intellectual property usage with the tech companies, small-size organizations and local newspapers do not possess such leverages. This might result in job losses, because some newspaper companies may not be able to remain competitive. As Schafer argues,

“if you become a technology-taker rather than a technology-maker, you are dependent on cloud computing infrastructure from places like Microsoft. They hold all the cards if they decide to raise prices or change the conditions of licensing and accessing deals. You are at the short end of the stick” (Shafer, 2024).

2. The result for the users of ChatGPT or derived models will be to receive a short resume of the article with a link to read the full text. OpenAI claims that in this way publishers will increase their online readers, but there is no certainty that this will happen.

It is worth keeping in mind that:

“ the companies that provide these new [technologies] are not in the news business; they have no institutional commitment to the public arena, and even less so to the normative demands of the public sphere. They seek user retention and advertising play. Nevertheless, they are powerful interlocutors between established news media, political elites, and publics, and hold considerable sway within the public arena, without many of the regulatory burdens traditional media companies face” (Jungherr & Schroeder, 2023, p. 167).

This element is especially relevant for democratic countries, whose political stability is tightly linked to a healthy, well-functioning, pluralistic information ecosystem, in which the key actors influencing politics shall be held accountable for their decisions. If the management of such a system is outsourced to profit-maximizer companies, the consequences can be detrimental to both the quality of the content produced and citizens' trust in news outlets (Reisach, 2020). As we have seen, AI impacts both the production and the consumption sides: on the one hand, the business model based on data collection and content recommendation incentivizes the production of articles in pursuit of the most efficient way to be recommended by the platforms' algorithms, while on the other hand, users normally have few control over the automated selection of the news sources they are exposed to, which is based on their previous online activity. Since the primary objectives of platform algorithms are user engagement and exposure to targeted advertising, news content effectively becomes another means to achieve these goals: news must be customized for each individual "consumer", similarly to how advertising is personalized (Ofcom Report, 2018). News outlets generally adapt to this new information environment to avoid the risk of falling into the chasm of algorithmic irrelevance; namely, the well-known problems of clickbait, sensationalistic content, and disinformation emerge (Reisach, 2020). To be sure, these are not new phenomena at all; in the era of social media platforms, they are just better rewarded by algorithms.

Therefore, the U.S. market-driven model of AI application to media might well be at the heart of some widely discussed socio-political problems like confirmation bias and self-reinforcing feedback (Trattner, Jannach, Motta, et al., 2022, p. 588) (the exposure to content the user already knows and agrees with), popularity bias (Trattner, Jannach, Motta, et al., 2022, p. 588) (the spread of already visible content at the expense of a more researched and less known subject), as well as the consequent formation of the so-called “filter bubbles” or “echo chambers” (self-reinforcing digital environments where users find information that confirms their existing beliefs) which ultimately lead to more societal polarization (Trattner, Jannach, Motta, et al., 2022, p. 588).

INNOVATING FROM THE TOP: AI AND MEDIA IN CHINA

THE DIGITAL WAY TO FREEDOM

The development of digital technology in the 1990s and early 2000s bore the promise of liberalization of societies all around the world. The internet was thought to carry the potential of strengthening democracies and exposing the corruption and abuses of autocracies (Acemoglu & Johnson, 2023, p. 339). As President Bill Clinton famously stated in 2000, for China to keep restraining speech in the internet era was “like trying to nail Jello to the wall”. In another quote that pictures the mood of the time, the Google engineer and eminent figure of the 2010 Egyptian protests Wael Ghonim stated “If you want to liberate a society, just give them internet. If you want to have a free society, just give them internet” (Acemoglu & Johnson, 2023, p. 342).

It is clear today that these initial hopes about the internet were not fulfilled, and China did manage to “nail Jello to the wall” (Allen-Ebrahimian, 2016). While it is debatable whether the role of the Internet and social media is more beneficial or detrimental to the state of democratic systems around the world (Tiffany, 2023) [3],

3. For a survey on the public opinion on the relation between social media and democracy, see Gubbala, S. and Austin, S. (2024). Majorities in most countries surveyed say social media is good for democracy. Pew Research Center. Available at <https://www.pewresearch.org/short-reads/2024/02/23/majorities-in-most-countries-surveyed-say-social-media-is-good-for-democracy/>; For a book-length discussion on the topic, see Persily, N. and Tucker, J.A. (2020). Social Media and Democracy. Cambridge University Press. Open access available at <https://www.cambridge.org/core/books/social-media-and-democracy/E79E2BBF03C18C3A56A5CC393698F117>

it is evident that digital technology has helped autocratic regimes strengthen their control over speech. This is especially true for China, which not only used the Internet to make censorship and surveillance more efficient, but it created a whole new concept of “digital sovereignty” as an entirely alternative (and potentially replicable) way of managing the digital world. This concept was inaugurated and implemented by the Chinese scholar, computer scientist, and politician Fang Binxing (oftentimes called “the father of Chinese censorship”) and is exemplified by the famous Great Firewall, i.e. the system that keeps the Chinese internet separated from the rest of the world (Pieranni, 2023, p. 154).

A STRATEGY FOR AI

AI comes as a natural tool for managing this Chinese digital sphere. Indeed, it promises to be much more than a simple efficiency tool for content moderation on newspapers, blogs, and platforms; with its potential of “decomposing and recomposing the large and the small” (Aradau & Blanke, 2022, p. 31) (i.e. giving a large “bird’s-eye” view through big data while at the same time keeping the surveillance pervasive and detailed), it promises to realize the old dream of “data-driven” total societal governance expressed by the influent scientist and futurologist Qian Xuesen (Pieranni, 2023, p. 95). Qian’s vision is “a scientific view of society, conceived as a software, which is something you can program, plan and control” (Pieranni, 2023, p. 92). The importance of Qian’s thought did not reveal itself fully at the time of his cybernetics writings (from the ‘50s to the ‘80s) because China and the world lacked the necessary amount of data and computational power to apply these concepts. The same vision, however, resurfaced to shape today’s strategy for Chinese development and applications of AI.

The first comprehensive document describing China’s overall strategy for AI development, implementation, and regulation is the 2017 New Generation AI Development Plan (AIDP) (Roberts et al., 2019). The overarching aim of the document is to make China the world center of AI innovation by 2030. There are three strategic objectives for which the Chinese government has put AI development high on its priorities (Roberts et al., 2019 p. 62; Pieranni, 2023, p. 191). The first is reaching up in the international competition; being a general technology, AI has dual-use applications that make it important both in the civilian and military sectors.

The second is exploiting economic opportunities; in a 2022 document, Big Data has been labeled as “the fifth factor of production” in the Chinese economy (together with work, land, capital, and technology) (Pieranni, 2023, p. 218). The third is the already mentioned possibility of social governance. While this last objective can be considered a form of oppressive and invasive governance through AI, it seems to be generally welcomed by the Chinese public, especially in the applications that promise to combat the “moral decline” of the population (Roberts et al., 2019, p. 66). While the approval of controversial AI applications like the “Social credit systems” might reflect “a general lack of awareness, rather than a widespread support” (Roberts et al., 2019, p. 67), the prevalence of positive sentiments towards AI in general and its uses in the media seems to be confirmed by at least two other China-based surveys (Sun, Hu, & Wu, 2024; Cui & Wu, 2019).

The actual implementation of the AI Strategy outlined in the AIDP starts with directives from the central government. The centralized nature of the plan, however, should not be considered in its strictest sense:

“The plan is not meant to act as a centrally enacted initiative. The AIDP instead functions as an incentiv[e for] local projects that make use of AI. [...] The AIDP is an ambitious strategy set by the central government, but the actual innovation and transformation is expected to be driven by the private sector and local governments. In other words, it is more appropriate to view the AIDP as a highly incentivised ‘wish list’, to nudge, and coordinate other relevant stakeholders” (Roberts et al., 2019, p. 61).

This observation has relevant implications for our object of inquiry, the Chinese media landscape. While the government designates some “national champion” media companies to apply AI technology in line with its strategic objectives, some forms of competition remain, ultimately shaping the use of AI in ways that are not strictly planned. This reflects a wider, decades-old trend in the Chinese media ecosystem where, starting from the ‘90s,

“the Chinese media system began to transform as media outlets were released from the propaganda apparatus due to a phenomenon described as ‘media marketization’. As a result, media organizations began to compete in the market to gain users and economic benefits. One notable effect of this transformation was a softening of the concept of propaganda, even in official media outlets, to attract more users” (Barredo-Ibáñez, Jamil, & De-la-Garza-Montemayor, 2023, p. 102).

While this trend may have slowed down, if not halted altogether, during the Xi era, it would be inaccurate to assume that every application of AI in Chinese media is tightly controlled from the top. Nevertheless, the Chinese approach to AI still appears very centralized when compared to the U.S.’s almost purely business-driven model.

AI IN TRADITIONAL NEWS MEDIA AND WE-MEDIA

AI is used in Chinese traditional news media mainly in three ways: robot writing, the creation of virtual anchors, and news distribution and recommendation systems (Wang, 2021). Other uses refer to topic selection, editing manuscripts, and making marketing strategies (Zhao & Prabhashini, 2019).

The writing of articles by robots is the most developed field of application of AI in Chinese journalism. The first robot for the generation of simple financial news articles was Tencent’s “Dreamwriter”, which dates back to 2015 (Wang, 2021, p. 2). Since then, content generators have become much more sophisticated and pervasive in newsrooms: for example, a cooperation between the news platform Jinri Toutiao and the China Seismological Bureau created software capable of writing articles on earthquakes directly based on the seismic data, without any human intervention in the loop (Wang, 2021, p. 2). While most newsrooms have automated at least a part of their writing processes, AI is rarely used for covering topics other than finance, sports, and culture, which are topics where the “raw data” (e.g. the results of a game, the quotation of a title in the Stock exchange or the date of an event) are at the center of the piece of news (Zhao & Prabhashini, 2019).

This feature of AI use in newsrooms is similar to what has been noted above for the U.S. Interestingly, these are also the topic areas with the highest proliferation of disinformation in China (Barredo-Ibáñez, Jamil, & De-la-Garza-Montemayor, 2023, p. 763).

AI-generated news anchors are a peculiarity of the Chinese media landscape; China has by far the highest number of virtual news anchors in the world (Wang, 2021, p. 2), and they seem to be appreciated by the public (Sun, Hu, & Wu, 2024, p. 561). This is probably the application of AI with the least social and political impact, since it mostly deals with the aesthetic of the content delivery and not the content itself. However, it is not excluded that the presence of a virtual anchor might impact the credibility and authority of a news outlet. The currently available survey data suggests that “the [Chinese] public’s emotions towards the news broadcast by AI simulated anchors are mainly positive” (Sun, Hu, & Wu, 2024, p. 561).

The Chinese algorithmic news distribution and recommendation system responds to the same needs as its Western counterpart; in a digital environment where billions of gigabytes of data are generated every day, the recommendation of content to interested users cannot be anything but automated. Some examples of Chinese AI-powered news distribution platforms are the already mentioned Jinri Toutiao (developed by Bytedance, also owner of TikTok) and the Yidian News (Wang, 2021, p. 3).

News distribution platforms share some of the same functioning mechanisms as social media platforms: they use a complex algorithm to create a profile for each user, based on which targeted content (and ads) are recommended. The so-called We-media (a generic term that refers to non-institutional media platforms, like Weibo and WeChat), however, applies AI in a more rapid, efficient, and relatively uncontrolled way compared to traditional media (Jiang et al., 2023; Sun, Hu, & Wu, 2024, p. 552). This amplifies some of the risks and issues related to AI applications.

RISKS AND ISSUES OF AI APPLICATIONS IN CHINESE MEDIA

When analyzing the risks associated with AI applications to the media, it is important to clarify whose risks we are discussing. The perceived risks of AI use in Chinese media change according to the actor that is potentially damaged by that risk.

From a Western point of view, the risks of a widespread AI implementation have already been discussed above; AI has the potential to make surveillance and control over public speech stricter and more pervasive than ever. Another object of concern for the U.S. and European countries is the potentially disruptive effects of AI applied to information operations and the dissemination of disinformation abroad carried out by the Chinese authorities (Vicens, 2023; Qiao, 2023). Indeed, AI-powered technologies like deepfakes and realistic automatically generated texts, images, and videos are potentially powerful tools for more effective disinformation campaigns.

From the point of view of the Chinese government, AI applications in media can constitute a danger for at least two reasons. Firstly, available AI tools can be used in unpredicted ways by users and can generate results potentially not in line with Beijing's agenda. The Cyberspace Administration of China clearly stated that AI-generated content has the potential to "endanger national security and social stability" (Starks, Nakashima, & Cadell, 2023). For this reason, AI tools for generating texts have recently been heavily restricted or altogether banned in China (Starks, Nakashima, & Cadell, 2023), with the undesired consequence of significantly slowing down their development. Secondly, AI tools generated by gigantic "national champion" corporations can generate substantial profit for these companies, such that these have the potential to constitute a countervailing power to the central government. For this reason, "in the last two years, China has carried out a furious campaign against platforms, with the aim not to destroy them, but rather to rectify their behavior. Chinese platforms had become too powerful and [...] needed to be called back to order" (Pieranni, 2023, p. 219). These campaigns notwithstanding, there remains a crucial dilemma between fostering AI innovation and keeping tech companies on the government's leash.

Lastly, traditional media are also worried about some of the AI applications to the media. These concerns closely recall those of many media outlets in the U.S.: the fear of widespread copyright infringements (since text generators often use newspapers' articles for their training, producing slightly different outcomes), the flooding of huge amounts of low-quality automatically generated news on social media platforms, and the possibility of lagging behind new media in a competitive, fast-changing technological landscape (Yu, 2023).

CONCLUSION

Our research drew upon existing literature to explore how AI impacts media ecosystems in China and the U.S. Specifically, we examined the way media outlets have incorporated AI for the production and distribution of their content, and the policy approaches to AI regulation in the two countries. For what concerns the latter point, we used a traditional simplified distinction between two approaches: state-driven in China and market-driven in the U.S. The validity of this distinction might be questioned. In China, we have highlighted how the centralized nature of the AIDP is not rigid, leaving space for the influence of actors other than the state. In the U.S., public attention to recent AI developments is pushing policymakers in the direction of a more decisive regulatory intervention (Au, 2023). Nevertheless, our analysis shows that the general distinction, far from being a detailed description of reality, is accurate enough to describe some notable differences in the impact of AI on the media ecosystem. In the U.S., the main actors that shape AI applications in media are private enterprises (e.g. social media platforms, search engines, and big media outlets). In China, the main way to understand how AI is shaping the media environment remains to study governmental plans.

Our comparison found both differences and similarities between the two countries. A market-driven approach tends to allow the circulation of misinforming and polarizing content more compared to a centralized model, where the infosphere is more tightly controlled by the government. The uses of AI in the production of content, instead, tend to be similar in the two countries, going in the direction of increasing efficiency, especially in topic areas requiring lower intellectual sophistication. Common concerns include the risk of intellectual property rights infringements, the advantage of big news corporations over small news outlets, the prevalence of “new media” in the news diet of an increasing portion of the population, and job losses in newsrooms.

Further investigation is needed to fill some of the gaps left by this study. Firstly, further challenges to the validity of the two-model framework adopted might require an update to our findings. Secondly, the scope of our work might be expanded to study the relationship between AI and media in different political regimes (democracies, autocracies, illiberal democracies, etc.). Lastly, the discussion on the relationship between AI and media in China and the U.S. can be given a strategic dimension by considering the aspects of competition and the “AI race”, and how these impact the choices of the two governments.

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COMFORT WOMEN: A COMPARISON OF JAPANESE AND KOREAN NEWSPAPERS' VIEW

Lucilla Amerini, Rimi Kanaya

INTRODUCTION

The comfort women issue is an issue that confronts Japan and South Korea since the 1990s, when it became a theme in public discourse for the first time. The term comfort women refer to women who were forcibly conscripted to be sex slaves for the Japanese army at "comfort stations", that were built during the Pacific War by the Imperial Japanese Army in various parts of Asia and the Pacific, including Korea, China, Taiwan, the Philippines, Indonesia, Malaysia, Micronesia and the Solomon Islands (KYEOL, 2020). Between 100,000 and 200,000 women were "recruited" through deception and violence or abducted and taken away by the military from their homes. (International Commission of Jurist, 1995).

This paper aims to compare the views of Japanese and Korean newspapers, to understand which are the differences between the press of the two countries addressing the topic, and how this issue is reflected in the current political relations between the two countries. The first part presents the context of the media system in Japan and South Korea, referring to Eva Rohrhofer's model, and introduces the comfort women issue. Secondly, the comfort women issue is elaborated and compared through selected articles from both Japanese and Korean newspapers. By so doing, the paper tries to identify the correlation between the portrait of the comfort women issue and where the newspapers sit on the political spectrum. Lastly, we propose an analysis of the repercussions of the comfort women issue on political relations between Korea and Japan and draw our conclusions.

**NEWSPAPER LANDSCAPE AND THE MEDIA SYSTEM IN
JAPAN AND SOUTH KOREA**

The biggest newspapers that occupy the Korean media landscape are Chosun Ilbo, Tonga-Ilbo and Chungang Ilbo(Li, 2021), all of them with a conservative and a more pro-Japan attitude, especially the Chosun Ilbo. There are also minor newspapers, like Hankyoreh, that show a stronger attitude which is pro-North Korea and anti-Japan (David, 2016). On the other hand, Yomiuri Shinbun, Asahi Shinbun, Mainichi Shinbun, and Sankei Shimbun are among the largest newspapers in the Japanese media scene. Where Asahi and Mainichi Shimbun are considered to be on the left side of the political spectrum, the other newspapers are on the right-wing side (Yamaguchi, 2019).

To provide a description of Korean and Japanese media systems, in this paper we rely on Eva Rohrhofer's analysis in the article Media Systems and Political Systems in East Asia: A Comparative Analysis of China, Japan, and South Korea (2015). Rohrhofer uses "a comparative approach to analyse three East Asian nations and to find out if these nations' media systems show regional similarities despite their different political systems" (Rohrhofer, 2015, p. 160). For this article, China's media system analysis will not be considered, and we will focus on the newspapers, setting aside broadcasters. Rohrhofer (2015) refers to nine criteria, previously developed by Roger Blum in 2005, to and analyse media systems considering both political and media dimensions. These criteria are political system, political culture, freedom of media, ownership of media, funding of media, political parallelism, state control, media culture, and media orientation. According to this analysis, Japanese and South Korean media systems are quite similar, as they share seven out of nine criteria. Furthermore, both countries are considered democracies, even if South Korea is sometimes described as a "defective democracy" (Rohrhofer, 2015, p. 168).

In both countries, media are quite free with occasional censorship, and media freedom is guaranteed constitutionally. However, because in Japan the Liberal Democratic Party (LDP) has governed the country almost with no interruptions since 1946, many have highlighted the issue of how the Party's control on the media (Enokson, 2015) impacts democracy and media freedom.

Moreover, according to the Freedom House Report (2024), Japan's media landscape is not completely independent; this is because the government retains power to determine whether the information that a journalist wants to publish are acceptable or not for the public, and journalists may be prosecuted for revealing state secrets.

According to Reporters Without Borders (2024), South Korea was ranked at 62nd with regards to press freedom, while Japan was ranked 70th in the world. In terms of South Korea media freedom, the media landscape is considered secure, and censorship is also forbidden under the constitution of 1987 (Rohrhofer, 2015). However, there is still limited access to all news content because the National Security Law provides a government with a certain substructure to undermine unwanted news coverage. It could include information about pro-North Korean organizations. Moreover, the National Security Law allows the government to intervene in the press in an easier way than Japan. In Korean and Japan media ownership can be private and public and media funding comes both from the market and the state.

In terms of state control of media, Rohrhofer (2015) defines it as medium in both countries but for distinct reasons. In Japan, the state does not have many possibilities to control the media, but there is strict control in the elections period; in South Korea, state and different governments have always tried to control the media through political influence. Lastly, media culture is ambivalent both in South Korea and in Japan, as there are both concordant media and critical media and journalists.

Regarding media orientation, in Japan, media are strongly market-oriented: economic success is more important than public service. In South Korea, media are oriented not only to economic success but also to public service, even if since 1987 "the media landscape has been increasingly shaped by competition" (Rohrhofer, 2015, p. 179). It is interesting to note one last difference: in Japan, the post-war Japanese Constitution of 1947 guarantees both press freedom of expression and the prohibition of censorship (Rohrhofer, 2015), but journalists are organised in press clubs, a peculiar system where journalists from major media outlets enjoy close access to government officials, business executives and other sources (Freedom House 2024).

Usually, investigative journalists are excluded from press government conferences, and the system has been sometimes criticized as anti-democratic. In order to avoid this, in recent years non-traditional media, like online newspapers and magazines, have been investigating more aggressively because they are usually not affiliated with the press clubs (Freedom House 2024).

THE COMFORT WOMEN ISSUE

The existence of the “comfort stations” and comfort women has not been properly revealed for decades due to the Japanese government and military trying to conceal its existence. Apparently, the “intentions” of the Japanese army in dealing with the comfort women was “to effectively conduct the war through preventing the instability of public order caused by sexual violence against local women, containing and managing sexually transmitted diseases among soldiers, and providing sexual ‘comfort’ to soldiers to boost their morale” (KYEOL, 2020). In line with this, the Japanese imperial government and the army managed and regulated the overall operation of the “comfort stations”. At present, the total number of women who had been conscripted by the Japanese military is unknown. The estimates of the number of comfort women range from at least 20,000 to up to 400,000 people, “and widely differ from researcher to researcher” (KYEOL, 2020).

The victims also had a hard time coming forward due to the patriarchal atmosphere of East Asia, including Korea, and the perception of having a shameful past. There are some decisive factors that have contributed to the revelation of the issue. Among these, there was the public testimony given by Kim Hak-sun – one of the “comfort station” survivors – on August 14th, 1991. Another fundamental contribution was given by Yun Jung-ok, a professor at Ewha University, who began to investigate the theme in the 1980s, starting from her personal experience during World War II (Jung, 2023). The comfort women issue was also an important and driving theme for the Korean feminist movement in the 1990s and Korea’s Women’s Association United was active in the issue, trying to push Korean politics and formally asking official apology from the Japanese government and war reparation for the victims (Jung, 2023).

PROBLEMATIC MEMORIES AND DIFFERENT INTERPRETATIONS

The historical circumstances involving the sexual slavery system of women by the Japanese army are a major issue in the ongoing political tensions in Korea and Japan. Newspapers and journalists play an important role in reflecting the voices of victims and shaping public opinions and reconciliation efforts. However, different interpretations of matters such as compensation payments and the truthfulness of victim testimonies exacerbate the tension between the two countries, where one of the most debated topics between whether comfort women victims were forcibly dragged away by Japanese armies or not.

For example, according to Asahi Shimbun (2014), Seiji Yoshida - a Japanese writer - was the one who forcibly conducted the recruitment of comfort women on Jeju Island. However, according to other Japanese sources, no clear evidence was found of his supposed involvement (Nishioka, 2014).

In stark contrast with the Japanese positions, Korean media backed the victims' testimony, stating that these women were forcibly recruited by Japanese soldiers (Lee, 2016). For instance, Hankyoreh (2023) mentioned that one of the first victims of the "supposed" sex trade was Kim Hak-sun, who talked about her experience regarding forcible recruitment.

The seemingly irreconcilable positions expressed by the two countries media, also reflects in very different "approaches" on the topic in the academic sphere and research. For instance, in 2013, Sejong University professor Park Yu-ha published a book called *Comfort Women of the Empire*, in which he states that some Korean women at the time of the Japanese occupation volunteered and shared "comradely" relations with soldiers (Li, 2019). Nine comfort women activists sued Park for civil and criminal defamation, and Korean government prosecutors requested a three-year prison sentence for him (Tokiyoshi, 2022). However, Park was not alone; another important scholar, Professor Ramseyer, a Harvard Law School professor and Japanese legal history scholar, also stated a similar argument. According to Morgan (2023), "Professor Ramseyer argued that most of the women who worked at military brothels during World War II were paid prostitutes and that the arrangements into which they entered with the brothels were contractual".

However, his statement in the book was false, saying that these survivors of Japanese sexual slavery were regarded as “prostitutes” (Hankyoreh, 2021). The Korean media highlights historical injustice and emphasises the need for formal apologies from Japan, showing the evidence from victim testimonies. On the other hand, Japanese media hold a defensive stance, questioning the Korean historical narratives based on comfort women testimonies. In addition, it can be said that in academic context, Korean media might have limited freedom when it comes to sensitive issues.

POLITICAL RELATIONS BETWEEN JAPAN AND SOUTH KOREA

In 2023, the Prime Minister of Japan and the South Korean President agreed to end diplomatic and trade disputes related to Imperial Japan’s occupation of the Korean Peninsula and had a historical trilateral meeting at Camp David with the President of the United States. These events are seen as relevant breakthroughs considering how two countries that have long struggled to dialogue, as well as a chance to finally tackle the comfort women issue, which has left stains on the reputation of Japan in Korea’s public opinion. To understand how the two leaders managed to lead their relations to this pivotal point, a brief analysis of their contemporary historical relations is necessary. It is also relevant to state that while Japan’s political situation is quite static, with the Liberal Democratic Party almost always in power, in South Korea that is not the case: candidates from opposite political parties drastically change in their approach to foreign policy and to Japan specifically, with the progressives that generally have a tough stance against Tokyo and the conservative a more lenient one.

Japan formally annexed the Korean peninsula in 1910. Korea became integrally part of the Japanese Empire, until Tokyo’s surrender in September 1945 at the end of the Second World War. Although the following years of the American occupation of Japan shaped the construction of the modern Japanese state with a new pacifist Constitution, as stated in article 9, Tokyo has received accusations of deliberately obscuring aspects of its past regarding militarism and wartime aggression (Berger, 2012).

Japan-South Korea's relationship remained characterised by cooperation forced by the Americans in the absence of real political relations until the two countries normalised political relations in 1965, once again, under US pressure (Glosserman and Snyder, 2015). The "Treaty on Basic Relations" of 1965 does not mention it but refers to the 1910 Annexation Treaty, because Korea and Japan still did not manage to reach an agreement over the legality of the 1910 Annexation Treaty as well as the treatment of labour workers during Japan's imperial times. This "agree to disagree" stance is an incredibly unique characteristic of modern Korea-Japan relations that persists to this day and a common leitmotiv in Tokyo-Seoul interpretation of their narrative of the past.

In 1991, the Japanese government denied again any involvement of the wartime state and its military in the matter of comfort women, infuriating South Koreans. Among those affected was the former comfort woman Kim Hak-sun. She decided to "come out" publicly as a comfort woman, seeing it as a means to compel the Japanese government to confront the issue. In 1991, the testimony given by Kim Hak-sun and the other two victims finally made public accusations publicly against Tokyo. Kim Hak-sun's testimony was meticulously translated and published for the Japanese public. Kim's testimony was fundamental in establishing a new interpretation of the comfort women system in Japan (Nozaki, 2005). Thanks to her, a Japanese historian later published in major Japanese newspapers his research about the involvement of the Japanese Imperial Army in organizing the comfort women system for its soldiers. At that point, the Japanese government had no choice but to acknowledge military involvement, and Prime Minister Miyazawa Kiichi officially apologized to South Korea (Nozaki, 2005).

In 1998, Japan and South Korea signed a joint declaration called the "New Japan-Republic of Korea Partnership towards the Twenty-first Century". The Korean progressist President Kim Dae-jung was in the first year of his mandate at that point, with the surprising objective of improving relations with Japan and a diplomatic rapprochement with North Korea. Japan's help was necessary especially to juggle effectively in the complicated regional context, at a time when the North Korean threat was becoming increasingly tangible and concrete. The Declaration, signed by Prime Minister Obuchi and President Kim, was supposed to be the turning point towards better Tokyo-Seoul relations, as no other issue could be solved without facing the consequences of the colonial imperial past they shared.

In the text, the Japanese PM expressed “deep remorse” and a “heartfelt apology” for the “tremendous damage and suffering” caused by Japan to the people of South Korea (MOFA, 1998). The joint declaration emphasised the importance of dealing sincerely with the historical past as a necessary condition for building solid relations based on trust and mutual understanding: it was an incredible moment because Japan had never explicitly stated such an apology before, and PM Obuchi even received backlash from the more conservative side of his government.

In this complex scenario, the 1998 Declaration and partnership projects were positively welcomed by the Korean media, although the two leaders did not explicitly and thoroughly address the issue of history. However, despite the progress made, the good intentions of the Declaration trembled as soon as the historical issues resurfaced again just one year later (Glosserman and Snyder, 2015). Another decade of territorial and commercial disputes, radical accusations between the two governments reflected in the media, and the publication of controversial books on Japan’s colonial past that omitted or minimised tragic events and the comfort women issue further contributed to the deterioration of relations (Glosserman and Snyder, 2015).

Gradually, both South Korea and Japan made efforts to improve bilateral relations ahead of the 50th anniversary of diplomatic normalisation, which happened in 2015. In 2015, the negotiations led to an agreement to finally resolve the issue of comfort women. At the time, negotiations led by Fumio Kishida, the Foreign Minister at the time, supported the claim that these women were merely prostitutes. To make things worse, one of the conditions postulated by Tokyo for the full implementation of the agreement was the moving of the commemorative statue of a comfort woman from in front of the Japanese Embassy building in Seoul. However, that never happened, as the statue remains there to this day. With the 2015 declaration, as the 1998 was supposed to do, the two governments declared again that the comfort women question was concluded, but the Declaration, once again, did not satisfy the Korean public opinion and neither the victims. Although the Japanese government had agreed to pay 1 billion yen to a new Foundation established in 2016 to assist the 46 victims still alive, the Korean Council [1] called the agreement a form of “humiliating diplomacy” and “diplomatic collusion.”

1. The Korean Council for the Women Drafted for Military Sexual Slavery by Japan, known as The Korean Council, is a Korean non-governmental organization established in 1990 advocating the rights of the surviving comfort women and lobbying the Japanese government in order to receive compensations

**RECONCILIATION EFFORTS AND THE ASIAN WOMEN'S
FUND**

In 2015, there was a reconciliation effort, called the Comfort Women Agreement supported by Foreign Ministries of both countries. They mentioned that the issues were resolved finally and irreversibly with this announcement. In addition, Prime Minister Abe expressed his most sincere apologies to all the women who underwent immeasurable and painful experiences as comfort women. However, when Moon Jae-In was elected as Korean president in 2017, he could not accept the agreement over issues regarding its execution, stating that “the countries must look squarely to their history so issues related to their past will not become an obstacle while the countries move toward a more developed, mature relationship” (The Korean Times, 2017). Overall, there are still different perspectives and interpretations between the two countries. In addition, the Asian Women’s Fund was established by the Japanese government in 1994 to distribute monetary compensation for victims in South Korea, the Philippines, Taiwan, the Netherlands and Indonesia. However, the foundation activities were already dissolved in 2007 (The Asian Women’s Fund, 2005). Although the Asian Women’s Fund played an essential role in helping victims, Suzuki (2020) argues that “the Korean Council has opposed the Asian Women’s Fund that the Japanese government established in 1995 to send redress money to former comfort women. The group also criticized the 2015 Japan-South Korea bilateral agreement on settling the comfort women issue on grounds that it does not acknowledge the Japanese government’s legal responsibility”.

According to Suzuki (2020), in 2018, the organization spent 33.39 million won (\$27,200) in donation money but there is a suspicion that donations and resources were misused to make up for the costs of Yoon’s daughter’s study in the United States. Considering these facts, one of the most controversial issues is that victims in The Asia Women’s Fund argued that they still need to get proper apologies and compensation from the Japanese government even though the Japanese government already showed deep apologies and competition fees. Moreover, on November 23rd 2023, South Korean high courts ordered Japan to pay damages to comfort women (NHK, 2023).

RECENT DEVELOPMENTS

In 2018, the Korean Supreme Court surprisingly decided that Japanese private companies must compensate workers from the Korean peninsula who were working for the Japanese companies during the Pacific War, and sued Mitsubishi Heavy Industries Ltd. and Nippon Steel Corp. between 2013 and 2014. The ruling is based on the premise that the 1910 Japan-Korea Annexation Treaty was illegal, invalid under the 1948 Korean Constitution. The Korean Court further states that the 1965 Treaty does not terminate individuals' rights to claim damages; Japan disagrees, claiming that all reparation issues were settled in the Treaty with the normalization of bilateral diplomatic ties. Furthermore, the Japanese government argued that the ruling was not consistent with the 1965 Treaty of Basic Relations. The legal dispute escalated in 2019 when the South Korean Supreme Court convicted again Nippon Steel and Mitsubishi (Choe and Rich, 2019). Meanwhile, South Korea expressed a willingness to take responsibility for its crimes during the occupation period, leading to discussions between the two countries.

In 2023, amidst diplomatic talks and public reactions, the leaders of Japan and South Korea shared a meal at a renowned restaurant in Tokyo's Ginza district, with the idea of fostering a sense of camaraderie between the two leaders. However, historical tensions persisted, but finding common ground was necessary in order to address new security issues in the region such as North Korea and China's threats. In Seoul, protestors voiced their discontent with the government's proposal to address compensation for Japan's wartime forced labor through a third party-backed public foundation, rather than directly from responsible Japanese firms. This decision sparked widespread opposition among the South Korean population, with almost 60% expressing disapproval (Lee, 2023) and resulted in public protests. Many believed that the plan lacked Japan's official apology and direct compensation, crucial elements for reconciliation and justice according to the Korean public. Even among those in favour of the resolution in South Korea, Yoon is perceived as having made a considerable concession to Japan, risking domestic backlash. On the issue of wartime history, PM Kishida simply maintained that Japan upholds the 1998 joint declaration between the two countries' leaders that saw Japan already express "deep remorse" and a "heartfelt apology" for its 1910-45 colonial rule of the Korean Peninsula.

Since Yoon and Kishida re-rapprochement public opinion of both countries appears to be shifting, at least compared with the previous administration. In 2023, according to a joint survey conducted by Japanese and Korean think tanks, more Japanese had positive views of South Korea than had negative ones for the first time since 2013, and South Koreans' views of Japan have recovered from an all-time low in 2020 (The Economist, 2024).

As the governments of Japan and South Korea look ahead 2025, which will mark the 60th anniversary since they established formal relations with the Treaty of 1965, the potential for their cooperation to deepen further is still uncertain. Hopefully, the anniversary could serve as a stimulus for both governments to reevaluate their relationship and pursue avenues for greater cooperation, especially in the security sphere regarding North Korean and China threats, as well as their trilateral relation with Washington. Ultimately, the extent to which the scope of Japan-South Korea cooperation will deepen is going to be based on the willingness of their governments to address historical grievances, once again.

THE ROLE OF MEDIA

Based on political development and reconciliation written above, Korean and Japanese media plays an essential role in sharing narratives of the comfort women, influencing the political development as well as Korea-Japan relations. Media is a key instrument in maintaining public awareness of comfort women's controversial issues. Korean media tend to highlight the victim testimonies, the importance of demand for proper apologies and justice, making sure that the comfort women issue is an important point for South Korean people in order to reinforce national identity. By providing testimonies as evidence, the media tries to get attention from the public for support and empathy as a Korean people, leading to social movements and putting pressure on government to get response from Japan. The media can significantly influence political movements and affect diplomatic relations. In terms of the role of media in Japan, it tries to keep a stance that Japan contributed to dealing with comfort women issues and that the government already apologized for the past wrongdoing by providing an official statement. Media in Japan tries to convey the government's stance on comfort women issues to protect national identity and national pride.

In terms of reconciliation, media is key to initiating a dialogue about the comfort women and raising awareness about the importance of hearing stories from victims. Especially, the involvement of foreign journalists writing about comfort women in newspapers could be a key to reflecting a neutral stance for reconciliation because looking at controversial issues from third countries can reflect a neutral perspective, promoting public awareness about the importance of cooperation.

CONCLUSION

In wrapping up our exploration of the comfort women controversy, it is clear that the shadows of the past colonial relations between the two countries linger onto present relations between Japan and South Korea, through media, public opinion, and strictly political relations.

Turning our attention to the media landscape, we have shown how the two media systems are quite similar, although they hold their differences. We observed the stark divide in Japan's conservative-right and liberal-left newspapers, mirrored in South Korea's progressive and anti-Japan outlets. This media polarisation does not merely exist as a passive reflection of public sentiment; it actively shapes the narrative. The controversy regarding the existence of the comfort women issue relies on contrasting perspectives on victims' testimony, agreement, and reconciliation. On this basis, comfort women issues are an example of how unresolved historical challenges can evolve in the development of different narratives or interpretations, which will shape public perception and eventually political and diplomatic relations negatively. Depending on the newspapers, the way of interpreting this issue is so different that it can manipulate public arguments, besides the factual truth of the matter. Critics such as Professor Park Yuha and Ramseyer showed the importance of discussions on the topic and opened the debate on showing freedom of speech in the two countries. Deep historical tension and differences in interpretations emphasize the need for open dialogue and diplomatic efforts to find a shared fact or collaborative fact that both countries can agree with to understand historical legacies and finally resolve together.

As we reflect on attempts at political compromise and external influences, it is evident the role that countries like the US, China and North Korea have on the issue: sometimes these elements force a rapprochement that otherwise would not be possible, due to security and geopolitical circumstances. Due to the nature of the controversy itself, it is clear how the two countries, although they may appear to have various common cultural features, do not trust each other, although they are forced to reach compromises, due to geopolitical circumstances.

In this complicated scenario, the media emerges as a potent force for understanding the two democracies. Professor Park's legal troubles in South Korea underscore the delicate balance between free speech and societal sensitivities. The media, in its varied expressions, becomes a dynamic participant in the ongoing dialogue, emerging as the truer representation of the trajectory of public opinion, more than not in clear opposition with what the higher-ranking officials want to accept. Understanding the media's pivotal role becomes paramount in the intricacies of reconciliation between Japan and South Korea. With its limitations, it helps their respective politicians, and the world at large, to understand how these two democracies work and what the population think.

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