


## THE DEVELOPMENT OF ELECTRONIC MEDIA REGULATION IN SERBIA IN THE 20<sup>TH</sup> CENTURY \*

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**Andrej Blagojević**

Faculty of Philosophy, University of Niš, Republic of Serbia

ORCID iD: Andrej Blagojević

 <https://orcid.org/0000-0003-1124-2403>

**Abstract.** *This paper examines the historical development of Serbian legal frameworks related to electronic media in Serbia and former Yugoslavia over the past century, up to the democratic changes in 2000. The regulatory and legislative process, starting with regulations concerning radio receivers (in the 1920s) and culminating in the current Electronic Media Act (2023), was characterized by strong legal and political influence of the state on the media. The period of electronic media development is divided into three phases: the first spans the period from the inception of electronic media (1920s) until World War II (1941), the second covers the post-war period (1945) until the dissolution of the SFR Yugoslavia (1990s), and the third extends from the dissolution of the SFRY (1990s) to the democratic changes in 2000. The analysis covers key legislative milestones, such as the Rulebook on Private Radio-Telegraph and Telephone Receiving Devices (1923), the Broadcasting Stations Act (1955), the Basic Act on Broadcasting Institutions (1965), the Radio-Television Act (1991), and the Public Information Act (1991). The research reveals the significant influence of electronic media on general law in Serbia, highlighting historical legal challenges and illustrating the legal framework before the adoption of European standards and directives in the 21<sup>st</sup> century.*

**Key words:** media law, regulation, electronic media, development, 20<sup>th</sup> century.

### 1. INTRODUCTION

While the first media, in the forms recognizable today, officially emerged as early as the 17<sup>th</sup> century, the history of electronic media is much shorter. Although the discovery of electricity provided the foundation for electronic media, their full potential and importance were only realized in the 20<sup>th</sup> century with the emergence and popularization of radio and television. Electronic media have assumed a dominant role in the media landscape, a

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**Corresponding author:** Andrej Blagojević, LL.D., Assistant Professor, Department of Communicology and Journalism, Faculty of Philosophy, University of Niš, Republic of Serbia, e-mail: [andrej.blagojevic@filfak.ni.ac.rs](mailto:andrej.blagojevic@filfak.ni.ac.rs)

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position they still maintain today, though with a reduced influence due to the rise of new technologies, the internet, and media convergence. It is important to emphasize that the development of electronic media in Serbia, during nearly a century of their existence, was strongly influenced by the country's legal and political direction. Alongside numerous advancements in technology, from the establishment of the first radio station in Belgrade and the regulations governing its operation until the emergence of new media and the legal frameworks defining their status, media regulation in the Republic of Serbia has undergone some distinct phases of development, influenced and shaped by various shifts in the country's political system.

This paper chronologically presents the legal regulations related to electronic media in Serbia across three periods. The first period is about the early legal regulations of electronic media from the initial laws of the 1920s until the World War II. The second period refers to the legal framework from the post-war era until the *de facto* dissolution of the Socialist Federal Republic of Yugoslavia (1990s). The third period concerns the media regulations from the 1990s to the year 2000, marking the beginning of the adoption of the European standards in electronic media regulation. The focus is on the normative analysis of the most significant 20<sup>th</sup> century legal documents related to electronic media.

## 2. THE EMERGENCE OF ELECTRONIC MEDIA

The current legal framework for electronic media in Serbia is primarily based on the Electronic Media Act (2023),<sup>1</sup> which regulates the operations of the REM (the Regulatory Authority for Electronic Media), the media service provision, licensing, supervision, and other issues related to electronic media (Art. 1 of the EM Act). The Public Media Services Act<sup>2</sup> governs the specific category of public electronic media, including the operations of Radio Television Serbia (RTS) and Radio Television Vojvodina (RTV) as public media services (Art. 1 of the PMS Act). As a general law covering a broader field of public information, the Public Information and Media Act (2023)<sup>3</sup> also applies to electronic media. This legal framework is supplemented by laws indirectly related to electronic media, as well as by bylaws, regulations, and decisions. These have aligned with European standards for over two decades. However, the initial regulation of electronic media, specifically broadcasting, was not established in Serbia through laws but through contracts and rules.

Ivko Pustišek, a legal expert, journalist and editor at Radio Belgrade, who explored the legal framework from the inception of radio and television to the dissolution of the SFRY, noted that the first radio station in the Kingdom of Serbs, Croats, and Slovenians (SCS) was established in Belgrade-Rakovica in 1924. "In this regard, Yugoslavia can proudly claim to be among the first countries in the world which ordered a radio broadcasting transmitter in 1922 and began regular broadcasting in 1924" (Pustišek, 1990:45). Two years later, the radio station Belgrade–Rakovica temporarily ceased to operate, but resumed

<sup>1</sup> The Electronic Media Act (Zakon o elektronskim medijima), *Official Gazette of the RS*, no. 92/2023; <https://www.mit.gov.rs/extfile/sr/326/law-on-electronic-media.doc>

<sup>2</sup> Zakon o javnim medijskim servisima (The Public Media Services Act), *Službeni glasnik Republike Srbije*, br. 83/2014, 103/2015, 108/2016, 161/2020, 129/2021, 142/2022, i 92/2023; [https://www.paragraf.rs/propisi/zakon\\_o\\_javnim\\_medijskim\\_servisima.html](https://www.paragraf.rs/propisi/zakon_o_javnim_medijskim_servisima.html)

<sup>3</sup> Zakon o javnom informisanju i medijima (The Public Information and Media Act), *Službeni glasnik RS*, br.92/2023, [https://www.paragraf.rs/propisi/zakon\\_o\\_javnom\\_informisanju\\_i\\_medijima.html](https://www.paragraf.rs/propisi/zakon_o_javnom_informisanju_i_medijima.html)

its continuous operation in 1929. During this period, the Ministry of Post and Telegraph issued rules on radio receivers and contracts granting broadcasting permits to concessionaires, which included individuals, joint-stock companies, and social organizations. There were no laws regulating broadcasting at that time; instead, the issues related to radio station operations were addressed by means of contracts, rules and regulations. In addition, some international conventions, such as the Radio Telegraph Conventions (1906 and 1912), served as the legal basis for radio broadcasting. In the period from 1922 to 1939, Serbia adopted four sets of rules and five contracts governing this area (Nikolić, 2001:216, 220). The broadcasting-related contracts at that time were stricter than any legal provisions because the Ministry had the authority to independently assess whether a contractual clause had been violated and, based on its evaluation, could suspend the program and even confiscate the equipment without providing any compensation (Pustišek, 1987:145–146).

The first restrictive regulation on radio receivers, the Rulebook on Private Radio-telegraph-telephone Receiving Devices (1923),<sup>4</sup> was introduced under the Decree on the Organization of the Ministry of Post and Telegraph (Nikolić, 2001:217). Although this Rulebook comprised only five articles, its aim was to address the potential threat posed to the state by this new medium, given that radio stations had not yet started broadcasting (Pustišek, 1987:121). Article 1 of this Rulebook restricted the issuance of installation permits to the citizens of the Kingdom of Serbs, Croats, and Slovenians (SCS), limiting licenses exclusively to the reception (rather than transmission), and concurrently provided that each applicant for a license to own a radio receiver should sign a contract with the state. Article 2 of the Rulebook specified the obligations of applicants for licenses when purchasing and installing radio receivers. Article 3 of the Rulebook required the license holders of private radio-telegraph-telephone stations to keep confidential any information received through the receiving device that was not intended for them, and to report such information to the competent state authority in charge of mandatory inspection of receiving devices. Article 4 of the Rulebook established a fee for using radio receivers, whether equipped with a frame or an antenna, and granted a discretionary authority to the Ministry of Post and Telegraph Services to disable or confiscate the receiver. Article 5 of the Rulebook defined the broadcasted content (news, reports, concerts and operas), while emphasizing that the information was not intended for those without their own receivers (Nikolić, 2001: 217-218).

In subsequent years, four additional sets of rules were introduced, whereby the 1928 Rulebook and its later amendments remained in force until the World War II. Thus, no national-level regulations on broadcasting were enacted by 1941, except for those concerning the ownership of receivers and the payment of subscription fees. It can also be noted that international conventions and rules on radio communication were applied during this period. Until the year 1939, the relationship between the state and broadcasting organizations had been regulated by contracts, when the state directly began to own and produce program. This was achieved through the expropriation of Radio Belgrade and Radio Zagreb (Pustišek, 1987:145-146).

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<sup>4</sup> Pravilnik o privatnim radio-telegrafsko-telefonskim prijemnim aparatima (the Rulebook on Private Radio-telegraph-telephone Receiving Devices), *Službeni list Kraljevine SHS*, br. 180/1923.

### 3. THE PERIOD FROM THE POST-WW II PERIOD (1945) TO THE *DE FACTO* DISSOLUTION OF THE SFRY (1990s)

After WW II, during the period of self-managed socialism, there was a greater need for regulating this sector at the national level. The need was generated by technological advancements that caused television to replace radio as the dominant form of electronic media. Due to the private property limitations, stemming from the political system of that time, media were under the direct control of the state apparatus, accompanied by a lack of media diversity. Under the first Constitution of the time, the Constitution of the FPRY (1946)<sup>5</sup> recognized the right to private property but classified the telegraph, telephone, and radio companies as state property, defining them as public assets (Article 14 § 2 of the FPRY Constitution). Radio, as an electronic medium, was not included in the Press Act of 1945, which was adopted a year before the FPRY Constitution. Thus, it can be said that the first post-war national regulation in the field of broadcasting was the Regulation on the Organization of the Broadcasting Service (1946).<sup>6</sup> Although it was in effect for a short period (as it was replaced by a new regulation only two months later), this Regulation (1946) affirmed the state ownership of radio broadcasting and established the Broadcasting Directorate, later renamed the Broadcasting Services Committee, with extensive responsibilities in terms of planning radio coverage, defining general principles and guidelines, managing radio stations, developing plans for radio industry construction and production, establishing technical conditions and standards, training personnel, and overseeing internal and international cooperation. The Committee also played a significant role in setting radio subscription fees, which were later more comprehensively regulated through decisions and rules, including the 1947 Rulebook on Mandatory Registration of Radio Receivers and Subscription Fee Payment Methods<sup>7</sup> (Pustišek, 1987:154-155). Unlike its predecessor from 1945, the Press Act (1960)<sup>8</sup> was also important for regulating the press and other sources of information. However, the first legislative act which regulated the broadcasting sector in the post-war period was the Broadcasting Act (1955).<sup>9</sup>

*The Broadcasting Act* (1955) provided detailed regulations on radio stations, covering establishment, management, termination, financing, subscriptions, supervision, and other provisions. In its general provisions, this law assigned public service roles to radio stations, secured funding through social ownership based on principles of social governance, mandated compliance with domestic regulations and ratified international conventions and agreements, and recognized stations as legal entities with their own rules. Under this Act, all radio stations were required to join a common professional association. This Act also allowed for joint programming and public interest content, and emphasized that the provisions of this Act should be equally applied to television and television stations (Articles 1-11 of the BS Act). The federal or republic executive councils had the authority to establish broadcasting stations, whose management structures had to include the

<sup>5</sup> Ustav Federativne Narodne Republike Jugoslavije/FNRJ (The Constitution of the Federal People's Republic of Yugoslavia/FPRY, 1946), *Službeni list FNRJ*, br. 10/1946.

<sup>6</sup> Uredba o organizaciji radiodifuzne službe FNRJ (Regulation on the Organization of the Broadcasting Service, 1946), *Službeni list FNRJ*, br. 32/1946.

<sup>7</sup> Pravilnik o obaveznoj registraciji radio prijemnika i načinu plaćanja pretplate (Rulebook on Mandatory Registration of Radio Receivers and Subscription Fee Payment Methods, 1947), *Službeni list FNRJ*, br. 9/1947.

<sup>8</sup> Zakon o štampi i drugim vidovima informacija (The Act on the Press and other information sources, 1960), *Službeni list FNRJ*, br. 45/1960.

<sup>9</sup> Zakon o radiodifuznim stanicama (the Radio Broadcasting Stations Act, 1955), *Službeni list FNRJ*, br. 52/1955.

Council, a board of directors and a director (whose responsibilities were specified in the BS Act). Financing was hybrid (through subscriptions, other revenues and the budget); there was an obligation to register radio receiving devices (which was the subject matter of radio stations' control), as well as the obligation to report on possible disruptions in broadcasting reception (Articles 12–45 of the BS Act). The Act granted powers to the Federal and Republic Executive Councils to address any legal violations or discrepancies between broadcast content and domestic or international regulations (Articles 46–49 of the BS Act).

In some respects, the BS Act resembled modern broadcasting laws, particularly in its recognition of the public service function of radio stations, albeit interpreted differently under the socio-political system of the time. Nevertheless, it was highly significant for this phase of broadcasting development, as well as for the introduction of technical standards.

The Act on the Press and other information sources (hereinafter: the Press Act, 1960)<sup>10</sup> was the first general legislative act in the field of information that included provisions directly or indirectly related to broadcasting. In particular, the most significant provisions were contained in Chapter III: Radio and Television, which addressed critical media issues, such as: the requirement to appoint one or more responsible editors for each station, the right to publish responses to information, and the prohibition of publishing specified types of information as outlined in the press-related prohibitions (Articles 80-84 of the Press Act). Although the provisions on electronic media were contained in a separate section, the provisions were general and primarily modeled after those for printed media, reflecting a regulatory focus on the latter.

After the adoption of the 1963 Constitution of the Socialist Federal Republic of Yugoslavia (SFRY),<sup>11</sup> the legislator adopted new general and subject-specific laws on broadcasting. One of them was the *Basic Act on Broadcasting Institutions* (1965),<sup>12</sup> the most comprehensive legislative act on broadcasting organizations at the time. It granted significant autonomy to broadcasting institutions, limited only in matters of special societal interest, and allowed them to set radio and television subscription rates independently (Pustišek, 1987: 188). The Broadcasting Institutions Act (BI Act) introduced provisions that guaranteed a certain degree of independence for broadcasting institutions (Articles 1-10), covering their establishment (Articles 11-15), operations, subscriptions, and responsibilities (Articles 16-23 of the BI Act). This Act also detailed the internal organizational structure (the Council, a board of directors, and a director), and provisions on the participation of societal representatives in decisions of public importance (Articles 24-33 of the BI Act) as a concept aligned with contemporary media governance models. Other provisions covered fee collection (Articles 34-41), financial obligations (Articles 42-45), termination of broadcasting operations (Articles 46-57 of the BI Act), and penal, transitional, and final provisions. Unlike the *Broadcasting Stations Act* (1955), the *Broadcasting Institutions Act* (1965) significantly advanced the institutional development, cultural and societal role of broadcasting.

In subsequent years, the legislator adopted various decrees, regulatory and legislative acts, including the Basic Radio Communication Act (1965)<sup>13</sup> and two telecommunication

<sup>10</sup> Zakon o štampi i drugim vidovima informacija (The Press Act, 1960), *Službeni list FNRJ*, br.45 /1960.

<sup>11</sup> The Constitution of the SFRY (1963), [https://en.wikisource.org/wiki/Constitution\\_of\\_Yugoslavia\\_\(1963\)](https://en.wikisource.org/wiki/Constitution_of_Yugoslavia_(1963)).

<sup>12</sup> Osnovni zakon o radiodifuznim ustanovama (Basic Act on Broadcasting Institutions), *Služ. list SFRJ*, br. 15/1965.

<sup>13</sup> Osnovni zakon o radio komunikaciji (Basic Act on Radio Communication), *Službeni list SFRJ*, br.14/65.

systems acts: the Telecommunication Systems Act (1974)<sup>14</sup> and the Public Information System Act (1985).<sup>15</sup>

Notably, the state-level regulations began to emerge during the later SFRY period, highlighting the significance of specific radio and television broadcasters. In Serbia, the establishment of radio and television stations required the approval of a broadcaster of the state-level importance, specifically Radio-Television Belgrade (Veljanovski 2009:23). In this period, the key regulatory act was the Decision on Radio-Television Belgrade (1974), which provided a detailed framework for the organization and functioning of this media outlet. Summarizing the regulatory framework concerning radio and television broadcasting, Pustišek observes: "In the first two periods after the World War II (1944–1953 and 1953–1963), the legal provisions on broadcasting and information laws were introduced, alongside with the first national technical regulations. During the 1963–1971 period, around ten technical regulations were adopted; in the final 1971–1986 period, in addition to comprehensive federal legislation, the legislator also enacted legislation at the republic and province level, primarily of technical nature. In this period, as many as 120 Yugoslav standards related to broadcasting were adopted." (Pustišek 1987:312). It is quite natural that technological advancements led to the adoption of a growing number of legal and regulatory acts of technical nature related to broadcasting. In subsequent periods, the increase in regulations was aimed at decentralizing the broadcasting sector. However, the specific socio-political circumstances in this period were marked by the overt influence of the state on the media, restricting democratic development and media freedom through the existing regulations. The same pattern of legal framework development was applied to copyright regulations concerning electronic media (Blagojević, 2020:222).

#### 4. THE PERIOD FROM THE DISSOLUTION OF THE SFRY (1990) TO THE DEMOCRATIC CHANGES (2000)

After a period where the ruling system prevented any form of political, economic and media pluralism, the attempt at transition in the 1990s revealed all the negative aspects of both the previous and the existing system. Repressive media laws, along with the poor general political and economic situation in the country, led to a prominent polarization of the media. "Undemocratic media laws created chaos in the broadcast, allowing the establishment of a large number of private electronic media without clear rules" (Milutinović, 2012:219). The legal basis for such a situation in electronic media was the Radio-television Act (1991).<sup>16</sup> In addition, the legislator enacted several federal laws: the Communication Systems Act (1988)<sup>17</sup> and the Public Information System Act (1990).<sup>18</sup> The subject-specific laws related to electronic media were the Public Information Act (1991)<sup>19</sup> and the Communication Systems Act (1991).<sup>20</sup>

<sup>14</sup> Zakon o osnovama sistema veza (The Telecommunication Systems Act), *Službeni list SFRJ*, br. 24/74.

<sup>15</sup> Zakon o osnovama sistema javnog informisanja (The Public Information System Act), *Služ. list SFRJ*, br. 39/85.

<sup>16</sup> Zakon o radio-televiziji (The Radio-Television Act), *Službeni glasnik Republike Srbije*, br. 48/91, 48/91-ispr, 53/93, 55/93, 67/93, 49/94 I 11/2001, [http://demo.paragraf.rs/demo/combined/Old/t/t12/t12\\_002.htm](http://demo.paragraf.rs/demo/combined/Old/t/t12/t12_002.htm)

<sup>17</sup> Zakon o sistemima veza (the Communication Systems Act), *Služ. list SFRJ*, br. 41/88, 80/89 i 29/90, *Sl. list SRJ*, br. 34/92, 24/94 i 28/96, <https://bazapropisa.net/sr/zakonodavstvo/zakoni/7910-zakon-o-sistemima-veza.html>

<sup>18</sup> Zakon o osnovama sistema javnog informisanja (the Public Information System Act), *Služ. list SFRJ*, br. 84/90.

<sup>19</sup> Zakon o sistemu javnog informisanja (the Public Information Act), *Službeni glasnik RS*, br.19/91.

<sup>20</sup> Zakon o komunikacionim sistemima (the Communication Systems Act), *Službeni glasnik RS*, br. 38/91.

*The Radio-Television Act* (1991) addressed general provisions regarding broadcasting and some provisions related to the establishment and operation of the public enterprise Radio Television Serbia (RTS). It regulated broadcasting activities, including the production and creation of radio and television programs, the transmission of programs via terrestrial, cable and satellite communication systems, and the broadcasting of programs via terrestrial transmitters and cable distribution systems (Article 1 of the RT Act). The Act established the RTS (Article 2) and, for the first time, allowed dual ownership of electronic media, permitting both state and private ownership (Article 3 of the RT Act). The next section of the RT Act focused on procedures and organization concerning the use of radio frequencies, and the Government's duty to appoint a commission for their allocation and revocation (Articles 4-11 of the RT Act). The subsequent provisions focused on radio and television programs, the obligation to adhere to ethical values in reporting, and the rules on emergency broadcasts, local content, and advertising (Articles 12-15 RT of the Act). The second part of the RT Act covered the establishment and functioning of RTS as a public enterprise. It detailed the reasons for its establishment (Article 16), technical norms (Article 17), program content (Article 18), and the public interest obligations of RTS (Article 19 of the RT Act). Article 20 of the RT Act stated that RTS operated through its units: Radio Television Belgrade, Radio Television Novi Sad, and Radio Television Priština, with support from the Transmission Technology and Connections enterprise, which managed the country's broadcasting infrastructure. The internal organization, operational methods, and other matters were to be governed by the RTS Statute, which was approved by the Government (Article 21 of the RT Act). Of particular importance were the provision on the RTS ownership and assets; thus, the RTS was a state-owned enterprise but could be converted to other forms of ownership, provided that the state retained the majority control. The RTS was also entitled to establish joint-stock companies for commercial and other activities, provided that the state retained majority ownership (Article 22 RT Act). Subsequent sections addressed RTS internal organization, outlining the responsibilities of its governing bodies, including the Board of Directors, General Director, and Supervisory Board (Articles 23-28 of the RT Act). In the provisions on financing, the RT Act specified revenue sources, such as receiver usage fees, budget allocations, advertising (up to 20% of the total program), and other sources (Article 29 of the RT Act). The Act also included provisions on receiver usage fees, collected funds, and obligations of users and RTS concerning these fees (Articles 30-34 RT Act). The supervisory and punitive measures (Articles 35-37 of the RT Act) were followed by transitional and final provisions. Articles 38-43 of the RT Act outlined options for radio and TV organizations in cases of insufficient local programming, the launch of RTS operations, funding, frequency allocation, obligations of its governing members, and the appointment of directors and editors. The analysis of the second part of the Act reveals that it served primarily as a founding act for RTS rather than a comprehensive regulation of broadcasting. Formally, under the Public Enterprises Act (1990),<sup>21</sup> RTS was categorized in the group of infrastructural enterprises (utilities), alongside with electricity, water management, railways, forestry, air traffic and PTT (postal, telegraph, and telephone service) companies (Plavšić, Radojković, Veljanovski, 1993:30).

*The Public Information Act* (1991) was often criticized as one of the worst media laws to date and described as being "so much worse than the previous law that it could not be matched even by the first post-war Press Act of 1946" (Vodinelić, Đerić, Gajin, Stojković,

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<sup>21</sup> Zakon o javnim preduzećima (Public Enterprises Act), *Službeni glasnik SRS*, br. 6/90.

Živković, 1998:9). The law was rife with inconsistencies, legal gaps, and repressive provisions. These included restrictions on radio frequencies and TV channels as natural resources managed by the government (Article 6) and prohibitions on broadcasting "undesirable" foreign audio and video materials via radio and television (Articles 34-36 of the PI Act). These provisions were also part of the repressive Public Information Act (1998),<sup>22</sup> which featured exorbitant fines for politically unfavorable media. Thus, while the media market and commercial broadcasters were introduced for the first time, the state retained the control over broadcast content, threatening disproportionate penalties for disseminating information "against the constitutional order." Based on an analysis of these laws, this period is marked as stagnation in media regulation, not only in the area of electronic media but also in the broader context. This stagnation has created a paradox: the simultaneous global progress in technical and technological development and the regressive media regulation at the state level.

## 5. CONCLUSION

The analysis presented in this paper demonstrates that the development of electronic media regulation in Serbia during the 20<sup>th</sup> century clearly reflected socio-political and technological transformations defined by each historical period. From its inception to the democratic changes in the 2000s, the regulatory framework of electronic media in Serbia evolved in response to shifting state ideologies, international influences, and the growing complexity of the media landscape.

*In the first period*, from the emergence of electronic media in the Kingdom of SCS (1920s) to World War II (1941), the legal regulation primarily focused on the state's role in managing and operating radio infrastructure. This period was characterized by the early establishment of electronic media, where the initial regulatory efforts were aimed at controlling the content and ensuring that media served the state's propaganda and information needs. *In the second period*, from the end of World War II (1945) to the dissolution of the SFRY (1990s), the socialist system brought about centralized media control. Media were state-owned and tightly regulated to promote socialist values. The major feature of this period was a lack of pluralism, with the government exercising strict oversight over broadcasting content and structure. *During the third period*, from the dissolution of SFRY (1990s) to the democratic changes in 2000, the media environment became a battleground for political control amidst the collapse of socialism and the rise of the nationalist regime. The regulatory frameworks were repressive because the legislator imposed severe penalties on politically noncompliant media. Although the introduction of commercial broadcasters marked the start of a dual ownership system, the state continued to maintain significant control over the content and media frequency allocation, thus limiting the development of an independent media landscape.

On the whole, media regulation in Serbia in the 20<sup>th</sup> century reflected global technological advancements and kept pace with world's technology but, at the same time, it was limited by domestic political agendas. The tension between technological progress and restrictive governance is commonly found in transitional societies, such as Serbia, which highlights the complexities of regulating media in general. Although it may be concluded that some steps

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<sup>22</sup> Zakon o sistemu javnog informisanja ( the Public Information Act), *Službeni glasnik RS*, br. 36/98.



were made to modernize the media system, the state control remained a major obstacle to the development of a pluralistic and independent media for a long period of time and persisted until the democratic changes in the early 21<sup>st</sup> century. By analyzing the regulatory evolution across these three distinct periods, this study aims to highlight the interaction between media policy, technological progress, and political authority in shaping Serbia's media landscape.

## REFERENCES

- Blagojević, A. (2020). The Development of Rights of Electronic Media Through the Development of Copyright Laws in Serbia, *Facta Universitatis: Law and Politics*, no. 18(3), pp. 213–224.
- Milutinović, I. (2012). *Nastanak i razvoj regulacije radio-difuzije u Srbiji*, PhD dissertation, Fakultet političkih nauka, Beograd.
- Nikolić, M. (2001). Nacionalno zakonodavstvo u oblasti radija i radio-difuzije u periodu od 1918. do 1941. godine, *Zbornik radova Fakulteta dramskih umetnosti*, no. 5, pp. 213–225.
- Plavšić, P., Radojković, M., Veljanovski, R. (1993). *Ka demokratskoj radio-difuziji*, Soros fondacija, Beograd.
- Pustišek, I. (1990). *Radio Beograd 1924 – prva radio-stanica u Jugoslaviji*, Radio Beograd, Beograd.
- Pustišek, I. (1987). *Istorija zakonodavstva o radio-difuziji u Jugoslaviji (1907–1986)*, Savremena administracija, Beograd.
- Veljanovski, R. (2009). *Medijski sistem Srbije*, Fakultet političkih nauka, Beograd: Čigoja Štampa.
- Vodinić, V., Đerić, V., Gajin, S., Stojković, D., Živković, M. (1998). *Pravo medija – s modelom Zakona o javnom informisanju*, Beogradski centar za ljudska prava, Beograd.

## Legal Documents

- The Electronic Media Act (Zakon o elektronskim medijima), *Official Gazette of the RS*, no. 92/2023; <https://www.mit.gov.rs/extfile/sr/326/law-on-electronic-media.doc>
- Zakon o javnim medijskim servisima (The Public Media Services Act), *Službeni glasnik Republike Srbije*, br. 83/2014, 103/2015, 108/2016, 161/2020, 129/2021, 142/2022, i 92/2023.
- Zakon o javnom informisanju i medijima (The Public Information and Media Act), *Sl. gl. RS*, br.92/2023.
- Pravilnik o privatnim radio-telegrafsko-telefonskim prijemnim aparatima (the Rulebook on Private Radio-telegraph-telephone Receiving Devices), *Službeni list Kraljevine SHS*, br. 180/1923.
- Ustav Federativne Narodne Republike Jugoslavije/FNRJ (The Constitution of the Federal People's Republic of Yugoslavia/FPRY, 1946), *Službeni list FNRJ*, br. 10/1946.
- Uredba o organizaciji radiodifuzne službe FNRJ (Regulation on the Organization of the Broadcasting Service, 1946), *Službeni list FNRJ*, br. 32/1946.
- Pravilnik o obaveznoj registraciji radio prijemnika i načinu plaćanja pretplate (Rulebook on Mandatory Registration of Radio Receivers and Subscription Fee Payment Methods, 1947), *Sl. list FNRJ*, br. 9/1947
- Zakon o radiodifuznim stanicama (the Broadcasting Stations Act, 1955), *Službeni list FNRJ*, br. 52/1955.
- Zakon o štampi i drugim vidovima informacija (The Act on the press and other sources of information, 1960), *Službeni list FNRJ*, br. 45/1960.
- The Constitution of the SFRY (1963), [https://en.wikisource.org/wiki/Constitution\\_of\\_Yugoslavia\\_\(1963\)](https://en.wikisource.org/wiki/Constitution_of_Yugoslavia_(1963)).
- Osnovni zakon o radio komunikaciji (Basic Act on Radio Communication), *Služ. list SFRJ*, br.14/1965.
- Osnovni zakon o radiodifuznim ustanovama (Basic Act on Broadcasting Institutions), *Služ. list SFRJ*, br. 15/1965.
- Zakon o osnovama sistema veza (The Telecommunication Systems Act), *Službeni list SFRJ*, br. 24/74.
- Zakon o osnovama sistema javnog informisanja (The Public Information Act), *Sl. list SFRJ*, br 39/85.
- Zakon o sistemima veza (the Communication Systems Act), *Službeni list SFRJ*, br. 41/1988.
- Zakon o osnovama sistema javnog informisanja (the Public Information System Act), *Sl. list SFRJ*, br. 84/90.
- Zakon o javnim preduzećima (Public Enterprises Act), *Službeni glasnik SRS*, br. 6/1990.
- Zakon o sistemu javnog informisanja (the Public Information Act), *Službeni glasnik RS*, br.19/1991.
- Zakon o komunikacionim sistemima (the Communication Systems Act), *Službeni glasnik RS*, br 38/1991.
- Zakon o radio-televiziji (The Radio-Television Act), *Službeni glasnik RS*, br. 48/1991.
- Zakon o sistemu javnog informisanja (the Public Information Act), *Službeni glasnik RS*, br. 36/98.

## RAZVOJ REGULACIJE ELEKTRONSKIH MEDIJA U SRBIJI U 20. VEKU

*Ovaj rad prikazuje istorijski razvoj pravnog okvira elektronskih medija u bivšoj Jugoslaviji i Srbiji tokom 20. veka, do demokratskih promena 2000. godine. Regulatorni i zakonodavni proces, koji je započeo 1920-ih godina donošenjem pravilnika o radio prijemnicima i kulminirao aktuelnim Zakonom o elektronskim medijima (2023), karakterisao je snažan pravni i politički uticaj države na medije. Ovaj period razvoja elektronskih medija podeljen je u tri faze: prva faza obuhvata period od nastanka elektronskih medija (1920-ih) do Drugog svetskog rata (1941), druga faza obuhvata posleratni period (1945) do raspada SFR Jugoslavije (1990-tih), a treća faza se proteže od raspada SFRJ (1990-tih) do demokratskih promena 2000. godine. Analiza obuhvata dokumente koji su bili prekretnica u regulisanju elektronskih medija, kao što su: Pravilnik privatnim radio-telegrafskim i telefonskim prijemnicima (1923), Zakon o radio-stanicama (1955), Osnovni zakon o radiodifuziji (1965), Zakon o radioteleviziji (1991), i Zakon o sistemu javnog informisanja (1991). Istraživanje ističe značajan uticaj elektronskih medija na opšti pravni okvir u Srbiji, daje istorijski prikaz ključnih pravnih izvora u procesu regulisanja elektronskih medija u Srbiji tokom 20. veka, i ukazuje na izazove u kreiranju normativnog okvira pre usvajanja evropskih standarda i direktiva u 21. veku.*

Ključne reči: *medijsko pravo, regulacija, elektronski mediji, razvoj, 20. vek.*