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Trust and Reputation of the European Commission

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Introduction

“The science of organization had learned too much from industry and not enough from Freud.”

Robert A. Dahl 1947, “The Science of Public Administration: Three Problems” p.6

The concept of reputation has been widely included since the 1940s in disciplines such as Public Relations and Business Administration (Barlow & Payne 1949, Woodward & Roper 1951, Christian 1959) and has recently become important in the Public Administration (PA) literature (Carpenter 2001¹, Krause & Douglas 2005, Carpenter & Krause 2011, Maor 2010, Maor et al. 2012, Busuioc & Lodge 2015, Busuioc 2015). This dissertation highlights reputation in a unique environment: Within a multi-purpose agency, the European Commission (EC).

Drawing on this special case of a multi-purpose agency with exacerbated media attention, the dissertation asks: What does reputation mean for the “*largest compound bureaucracy*” in the world (Trondal et al. 2010)? To answer this question, the dissertation first develops a theoretical framework, from which it derives the hypotheses that are tested using mixed methods.

¹ Carpenter’s earliest works on reputation started in 2000/2001 with examples such as “*The Forging of Bureaucratic Autonomy: Reputations, Networks, and Policy Innovation in Executive agencies*” or “*State Building through Reputation Building: Coalitions of Esteem and Program Innovation in the National Postal System*” (2000); which focussed on the Post office in the US, the FDA and other executive agencies;

Central in the dissertation is the theoretical framework, which builds around the unique feature of the EC: Its multi-purpose character. This unique feature marks the beginning of a different train of thought about the meaning of the concept *reputation*. To elaborate on this train of thought: Unlike single-purpose agencies, the Commission works in more policy domains and thus creates more media coverage. More media coverage, in turn expands the audiences watching the Commission from only interest groups to the general public. Interest groups and the general public use distinct mechanisms to evaluate the Commission: Interest groups evaluate based on performance, which the dissertation defines as *reputation*. Citizens evaluate based on values, which this work defines as *trust*. This way trust and reputation can be seen as competing mechanisms that create legitimacy. The dissertation argues, however, single-purpose agencies, which create less awareness depend more on interest groups' evaluation (reputation). Multi-purpose agencies like the Commission, which create more awareness, depend more on citizens' evaluation (trust).

Along this theoretical train develop four research questions, which emanate from the initial core difference: Working in few versus many policy domains. First, does working in more policy domains increase media coverage? Second, how are interest groups and the general public affected by enhanced media coverage? Third, is reputation based on performance? And fourth, is trust based on values?

The dissertation tries to answer these questions by expanding the current accounts of classical reputation research in Public Administration and adding *trust* as another potentially important concept next to *reputation*. Moreover, it intends to clarify the complex conceptualization of trust and reputation by investigating the underlying mechanisms, which create them. It argues that reputation is tightly linked to interest groups and performance-based evaluation, while trust relies more heavily on citizens

and value-based evaluations. Ultimately trust and reputation are then put into the theoretical framework as co-existing concepts that create legitimacy through values and performance respectively.

The dissertation will be organized as follows. The first chapter will introduce the topic by setting the scene (1.1), explaining the theoretical framework (1.2), defining trust and reputation (1.3) and describing how the hypotheses emanate from the theoretical framework (1.4). Consequently, chapter I constitutes the theoretical contribution in this dissertation by i) offering clear-cut theoretical and conceptual distinctions of terms and ii) developing the central hypotheses to be tested, on which all following sections are built.

The second chapter will explain *why* and *how* mixed methods have been applied for the empirical analysis. It will first describe the rationale behind choosing mixed methods (2.1) given the data limitation a purely quantitative methods would hold. Second, it will elaborate on the data and methods used in the quantitative part (2.2). And third, it will explain the qualitative method as a follow-up on the quantitative method, its research questions, data collection and analysis (2.3).

The third chapter will present the results of the empirical analyses. Following the sequence of the MMs, it will first present the outcomes of the quantitative (3.1) and then of the qualitative (3.2) analyses.

The dissertation will conclude by providing an overall picture of the conducted study that puts all results into relation and within the broader context of the European Commission as a multi-purpose bureaucracy. It will summarize the novel meaning of reputation in the special case of the largest and most politicized public administration in the world and create a compound picture of distinct forces that create legitimacy.

Chapter I

Theoretical Framework

The concept of reputation has been widely used since the 1940s in disciplines such as Public Relations and Business Administration (Barlow & Payne 1949, Woodward & Roper 1951, Christian 1959) and has recently become important in the Public Administration (PA) literature (Carpenter 2001²). Considering the reoccurrence of the topic in PA, this dissertation asks: What does the concept *reputation* mean for the “largest compound bureaucracy” in the world (Trondal et al. 2010) - the European Commission?

Carpenter defines reputation as a “*set of beliefs of an organization’s capacities, intentions, history and missions that are embedded in a network of multiple audiences*” (Carpenter 2010, p.33). This definition deals with beliefs — an indication for the evaluation of a public agency and the opinion that is formed about it. It also involves multiple audiences, emphasizing the non-homogenous nature of the population that forms reputation. Although these fundamental premises of Carpenter’s definition have noticeably influenced the literature in PA, studies predominantly focus either on the United States context (Krause & Douglas 2005, Carpenter & Krause 2011, Maor 2010), or on single-purpose agencies (Rimkute 2018, Rimkute 2020, Busuioc & Lodge 2015, Busuioc 2016, Maor et al. 2013,

² Carpenter’s earliest works on reputation started in 2000/2001 with examples such as “*The Forging of Bureaucratic Autonomy: Reputations, Networks, and Policy Innovation in Executive agencies*” or “*State Building through Reputation Building: Coalitions of Esteem and Program Innovation in the National Postal System*” (2000); which focussed on the Post office in the US, the FDA and other executive agencies;

Daugirdas 2015). To my knowledge, only one piece of work examines reputation quantitatively (Lee & Van Ryzin 2018), albeit only in the context of the U.S, and no study looks at a multi-purpose agency. This creates an opportunity to explore the concept of reputation in a different context – that of the European Commission, which is a multi-purpose agency operating in the multi-level system of the European Union.

With reference to the most famous study on this topic, “*Reputation and Power*” (Carpenter 2010), which inspects reputation of the Food and Drug Administration (FDA) over the last century, I argue that there are some similarities between the FDA and the European Commission, which allow to transpose the concept of reputation from the U.S. context into the new environment of the European Union (EU):

First, both organizations were created in response to certain historical focusing events. The FDA as we know it today was created in response to the 1937 sulfanilamide tragedy, where 107 people died after consuming dangerous pharmaceutical products (Carpenter 2010). After that incident, the *Federal Food, Drug, and Cosmetic Act* made the FDA the “*sole authority to reject the ex-ante marketability of any new pharmaceutical product*” (Carpenter 2010, p.73) in the U.S.—a recognizable power of the agency that is perceptible even today. Similarly, the European Commission was created in response to an even bigger event: World War II. It was established simultaneously with the European Community for Steel and Coal in 1951 in order to prevent such humanitarian crises in the future and guarantee peace (Dedman 2010). Furthermore, the Commission gained its current power during the response to another focusing event: In 2007, the Netherlands and France rejected a common European constitution and the Lisbon Treaty increased the Commission’s power as a substitute for the declined constitution.

Second, as the timings of their establishment show, both agencies started operating in institutionally weak environments. Just as the FDA was given sole authority to control drugs in a market that was still poorly regulated at that time, the Commission was given a great deal of authority in the newly established European Union.

This backdrop of an immature institutional setting is directly related to their third similarity: The agencies' potential to shape the institutional environment. The FDA and the Commission enjoyed a first-mover advantage, which made them capable of influencing and shaping their institutional surroundings.

This threefold juxtaposition demonstrates that the FDA and the Commission show some resemblance in their history, which makes them comparable in some ways. Considering their differences — one is a single-purpose regulatory agency and the other is a multi-purpose agency operating in a multi-level system — the question underlying this dissertation is: What does the concept *reputation* mean in the case of the European Commission?

Keeping the FDA and other single-purpose agencies in mind, the following section will set the scene for reputation in a new environment. It does so by assessing the institutional differences and similarities of the European Commission and the FDA in order to derive the most crucial concepts embodying these bureaucracies. Thereafter the dissertation will map these concepts' relationships, which lay the foundation of the analytical framework.

1.1 Setting the scene: Differences and Similarities between the European Commission and the Food and Drug Administration

Being one of seven EU Institutions³, the European Commission is probably the most complex but simultaneously the most unique organization within the multi-national system of the European Union. It is particularly special compared to the rest, because of its multi-purpose nature. While the institutions like the European Central Bank or the European Court of Justice work within one major policy domain (monetary policy or law for example), the European Commission deals with several policy domains. This fact combined with the budgetary power it holds over EU money and the sole competence to initiate proposals for EU legislation make the EC an extraordinary important agency in the EU and one of the most powerful bureaucracies in the world (Kassim 2013). With the headquarter located in the famous “Berlaymont building” the Commission counts about 32.000 civil servants⁴ throughout Brussels and Luxembourg (and capitals of all member states) working for 55⁵ different Directorate-Generals (DG) and executive agencies, each led by one Director General who is accountable for one of the 27 Commissioners, which are sent from the respective member states. Meanwhile each Commissioner represents the political lead at the top of a certain policy area, the Director General forms the bureaucratic head of each DG or executive agency. All DGs underlie the president of the Commission, who gets elected by the head of states and finally approved by the European Parliament and together with her cabinet sets the strategic direction of the European Commission. As said before, the Commission finds itself structured via DGs, which is slightly comparable to national public administrations, which are

³ The seven official EU institutions include the European Commission, European Parliament, European Council, Council of the European Union, European Central Bank, Court of Justice of the European Union, Court of Auditors (https://europa.eu/european-union/about-eu/institutions-bodies_en)

⁴ https://europa.eu/european-union/about-eu/figures/administration_en#:~:text=Around%2032%20000%20people%20are,of%20Parliament%20and%20their%20staff.

⁵ As of July 2021 (https://ec.europa.eu/info/departments_en)

divided into ministries. Like national ministries, also DGs ultimately work together for one common goal but often also compete for resources or risk to work in a silo-structured way⁶. While the Commission has government-like characteristics, it can be seen as an agency because of its independence, executive power, and insulation of direct political control. The multi-faceted environment and numerous policy domains in which the Commission works in, make it different from other conventionally studied bureaucracies working in few, more coherent policy domains, like for example the FDA.

Differences: European Commission versus FDA

A closer look at these two bureaucratic agencies reveals that their most crucial distinctions are in essence three: Policy domains, media coverage, and public awareness.

First, the Commission and other national bureaucratic agencies differ in terms of the number of policy domains they work in. A policy domain describes a reasonably established area of policy that gives meaning to common problems (May et al. 2006, in that Browne 1995, Burstein 1991, Laumann & Knoke 1987). Although it is often used interchangeably with policy subsystem in the literature (Burstein 1991⁷, Weible 2008), the two are different. Policy subsystem is defined as a policy community or network that is developed around particular programs (Matti & Sandström 2011, Weible 2008, Freeman 1985). Hence, there are several policy subsystems within a policy domain, which makes the subsystem a component of the policy domain. Whereas a policy subsystem relates to individuals and groups constituting the subsystem, policy domain relates to the popular meaning and category of an issue

⁶ I experienced several civil servants reporting silo-building and competition between DGs during my traineeship at the EC in 2019;

⁷ He mentions other terms with same meaning in literature: policy sectors, policy subsystems, policy dimensions, issue domains, policy programs;

that has a certain logic and coherence, such as healthcare (Burstein 1991). Whilst many national bureaucratic agencies work in mainly one policy domain (e.g. the FDA in food and drug regulation, EPA in environmental protection), multi-purpose agencies work in many (e.g. UK Home Office, working in 45 policy domains only considering the main departments). Moreover, because public agencies have different purposes, some agencies are active in more policy domains and some in fewer, depending on their overall objective. Hence, one can imagine a continuum ranging from few to many policy domains, and each public agency can be located at a certain point on this continuum. Going back to the examples, the FDA would be located at one extreme, working in few policy domains, while the Commission would be located at the other extreme, working in many policy domains — or more precisely in 55 policy domains occupied by 55 Directorate Generals and Executive Agencies⁸, ranging from market regulation (DG for Competition) to budgeting (DG Budget).

Second, the Commission and other agencies are distinguishable in terms of their media coverage, which creates a link to the public. According to the literature, media coverage — i.e. the inclusion of a topic in the news with the scope of reporting and discussing⁹ — renders topics visible for the public and provides an arena to give events meaning and social reality (Trenz 2004, Boykoff & Boykoff 2004, Beck & Ritter 2013, Trumbo 1996). It can be measured by volume, breadth, and prominence and has been shown to increase knowledge about a given issue among the public (Barabas & Jerit 2009). While conventionally studied bureaucratic agencies enjoy narrow media coverage tailored to their policy domain, the Commission experiences broader media coverage, simply stemming from the fact that it operates in multiple-policy domains, which increases the availability and suitability of news (Gans 1979).

⁸ For the source, the official Website of the European Commission was used:
https://ec.europa.eu/info/departments_en

⁹ <https://www.merriam-webster.com/dictionary/coverage>

Finally, the two agencies diverge in terms of the awareness they create. Public awareness is the extent to which individuals pay attention and understand current events (Claasen & Highton 2008; Luskin & Luskin 1987; Zaller 1990, Zaller & Feldman 1992; Ungar 2000). It is hence dependent on media coverage, which translates events to the public and serves as a gatekeeper between political events and the public (Baumgartner & Jones 1993, Carpenter 2002). Conventionally studied agencies like the FDA create less awareness and are discussed less often in public than the European Commission, which demonstrates their last major difference.

Despite these differences, the agencies also show several similarities, which are essential and lay the rationale for studying reputation in similar but distinct ways for the two.

Similarities

Although there are several micro-foundational similarities, the emphasis here lies on three macro-characteristics that are common to both of the agencies.

First, national bureaucratic agencies and the Commission enjoy a certain degree of independence. This means that these agencies can create independent knowledge and expertise, are not directly accountable to or dependent on elections, and work as agents for politicians with significant individual decision-making power and policy influence (Krause and Douglas 2005; Bertelli & Sinclair 2015, Bertelli et al. 2015).

Second, due to this independence, both forms of agencies enjoy an autonomous capacity that emanates from their managerial and policy autonomy; this allows them to generate expertise and decide on their budget. Autonomy is generally defined as not being subject to the will of another (Wolff 1970), and it can be derived from expertise (Carpenter 2010). However, the literature shows other sources of autonomy that are legal, structural, or financial in nature (for further discussion about

sources of autonomy, please see Verhoest et al. 2004, Knill & Bauer 2016, Lall 2017, Ege 2017, Bauer & Ege 2018, Trondal 2018).

Third, the Commission resembles other agencies in its policy output, almost exclusively characterized by regulatory policies (Majone 1999, Majone 2002, Majone 2014; Coen & Katsaitis 2013). Even though the Commission had solely regulatory power for some time, its competences have changed over the years and now also include distributive policies, which are discussed later in more detail. Dealing with regulatory policies is another fundamental factor that these agencies have in common.

These differences and similarities should set the scene and construct a rationale for research of agency reputation in the novel context of the European Commission. Other than single-purpose agencies, for which scholars have scrutinized reputation more extensively, the multi-purpose character of the Commission creates a new case, which offers space to study the concept in more detail and a novel way. By connecting these differences and similarities in a logical sequence, one can derive several theoretical implications that create a theoretical framework. The next section will introduce this framework by linking reputation and other crucial concepts and set the basis for the remaining chapters.

Table 1.1: Differences and Similarities

	National bureaucratic agencies	European Commission
Differences		
Policy Domains	Few	Multiple
Media Coverage	Narrow/ Specific	Broad
Awareness	Lower	Higher

Similarities	
Independence	Formally and informally independent organizations
Autonomous Capacity	Managerial and policy autonomy
Policy Output	Regulatory policies

1.2 Theoretical Framework

Policy domains, media coverage and public awareness

As is evident from the comparison above, the first and most obvious difference between the European Commission and other bureaucratic agencies lies in the aspect of multiple versus few policy domains. The fact that the EC works in multiple-policy domains is the most crucial difference, which stands at the beginning of the logical sequence (Figure 1.1). Referring to Whetten (1989, p.491), the “*arrows connecting the boxes*” in figure 1.1 explain the analytical framework and its trajectory from working in multiple policy domains over reputation and trust to legitimacy:

Considering the Commission’s work in multiple-policy domains (55 exactly¹⁰), it follows logically that the EC is involved in more policymaking than an agency that only works in fewer or one policy domain. Due to this larger repertoire of policy domains and broader scope of policymaking, the agency simply makes more decisions and carries out more actions in different venues. In turn, “doing more” — assuming that a certain percentage of these actions are always relevant for the public — increases the likelihood of being covered by media, simply because of the existence of more actions by the agency. This increased involvement in different issues creates a higher availability of news (Gans 1979; Barabas & Jerit 2009),

¹⁰ Here, I count the number of “Executive Agencies“ from the European Commission Website as the number of policy domains; However, this is not the only way to count them; for another, more precise option, see Coen & Katsaitis 2013; https://ec.europa.eu/info/departments_en

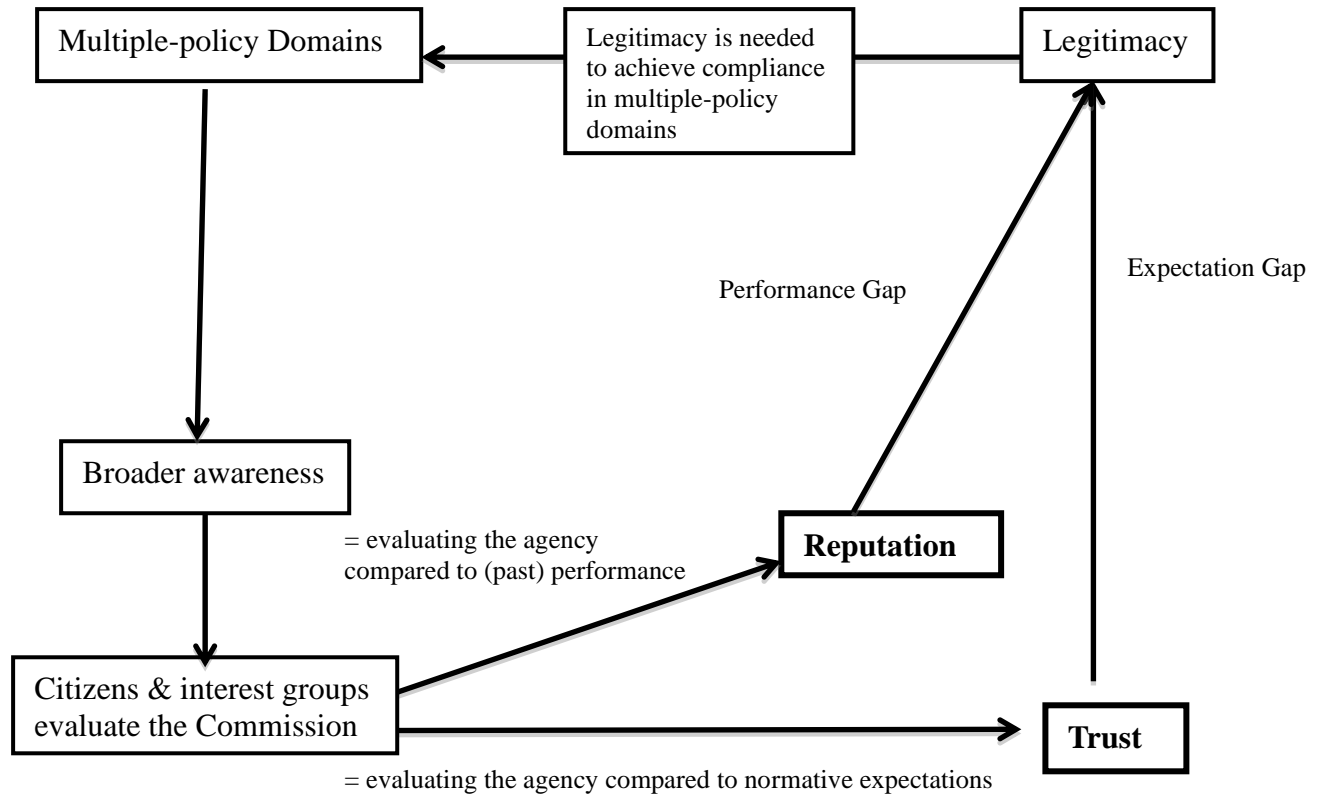
meaning that there is more news material to report to the public, which is translated via the mechanism of media coverage¹¹. Even though media coverage also depends on the severity of problems (Cook 1999, Sparrow 1999, Carpenter 2002) and on the holders of power (Foster et al. 2012, Trumbo 1996), several studies agree that availability and complexity of news determine media coverage to a large extent (Wilson 2000, Ungar 2000, Koopmans 2004). Considering availability and complexity as two characteristics that differ between the Commission and the FDA — the FDA produces more complex but less news while the Commission produces less complex and more news — they are expected to differ in their media coverage. The Commission should experience more media coverage than single-purpose agencies. Gans (1979) considers, besides the availability of news, suitability of news as the second main determinant of public awareness, which is defined as the extent to which an individual pays attention and understands current events (Claasen & Highton 2009; Luskin & Luskin 1987; Zaller 1990, Zaller & Feldman 1992, Ungar 2000). From a broader media coverage, wherein a larger number of different sources actually talk about an issue, it follows that a more versatile suitability of news is created, which results from the media-agenda setting effect in broader public awareness (Zaller 1990, Ungar 2000, Barabas & Jerit 2009). In short, the Commission should face broader public awareness than other agencies due to its larger media coverage.

Due to its higher profile, more people know about the Commission (Barabas & Jerit 2009, Druckman 2005) and can actually judge it, simply by virtue of being more aware of it and its actions. Since single-purpose agencies have lower media coverage and create less public awareness, they are expected to be evaluated only by industry professionals or people particularly interested in the policy domain in

¹¹ Definition according to the Merriam-Webster Dictionary: Inclusion of a topic in the news with scope of reporting and discussing it; <https://www.merriam-webster.com/dictionary/coverage>

which the agency works. This relates to Carpenter's idea of "multiple audiences", where he emphasizes the evaluation of an agency by interest groups (as opposed to the general public). In Carpenter's work the evaluations by different interest groups are the main determinants of agency reputation. This argument of multiple audiences looks slightly different in the case of the European Commission: Since it enjoys broader media coverage than single-purpose agencies, it creates more public awareness, meaning that almost anyone can judge or evaluate the agency, especially ordinary citizens, and its reputation does not solely rely on interest groups or multiple, scattered audiences. In summary, the likelihood of ordinary citizens evaluating the Commission as opposed to only interest groups is higher due to the higher number of issues in which the agency is involved and its higher media coverage, which conjointly create a higher probability of the agency to end up in the public discourse. Even though public awareness of an agency's action certainly also depends on the action's current position in the issue-attention cycle (Downs 1957), the likelihood of drawing public attention to one issue and thus to the public agency is higher when an agency operates in many policy domains and thus acts upon a higher number of issues. While multi-purpose agencies are likely to be covered frequently by general public discourse, single-purpose agencies are more likely to be evaluated by interest groups and only likely to be assessed by the general public when the issue is highly relevant or a severe problem (Cook 1999, Sparrow 1999, Carpenter 2002). This crucial difference in audiences evaluating the Commission as opposed to single-purpose agencies, is demonstrated in the lower left corner of figure 1.1.

Figure 1.1: Theoretical Framework



Mechanisms of Evaluation

The lower left corner of the theoretical framework shows citizens and interest groups evaluating the European Commission. How this evaluation is done, is central to the theoretical framework.

In general, every evaluation is based on the premise that whatever is to be evaluated must be compared on some specific grounds to something else or some standard. The comparison between two measurements is one crucial aspect of evaluating. The business literature demonstrates that vein of thought by emphasizing that businesses are well evaluated if they meet society's expectations or improve past performance (Berens & Riel 2004, Srivoravilai et al. 2011, Neville et al. 2005, Bromley 2000). I argue that similar rules apply to public agencies: An agency's performance can be compared to its past performance, or its actions can be compared to one's normative

expectations. The former is what the literature calls “*reputation*” (Fombrun & Shanley 1990, Rindova et al. 2005, Bergh et al. 2010) and the latter is often referred to as “*trust*” (Miller 1974, Coleman 1990, Hetherington 2007, Hetherington & Husser 2011¹²). Although trust is defined differently in many distinct fields, it has one common denominator across them: The idea that trust involves making oneself vulnerable to someone else with positive expectations that the other person would not harm but rather benefit one (Rosseau et al. 1998, Lewis & Weigert 1985). Taking the concept of trust to Public Administration and Political Science, scholars argue that it basically means “*the general attitudes toward government*” (Van de Walle and Bouckaert 2003) or, even more frequently, “*people’s evaluation of another [agency] in the light of normative expectations*” (Hetherington & Husser 2011, Coleman 1990; Hetherington 2007; Miller 1974, Stokes & Lasswell 1962). In comparison, for reputation the literature more often refers to evaluating an agency by comparing current performance to past performance (see also the expectation gap literature: Arrington et al. 1983, Kelley 1973, Koh & Woo 1998, Monroe & Woodliff 1993, Porter 1993, Lowe 2011). Trust, however, means evaluating an agency in the light of normative expectations (Hetherington & Husser 2011).

Hence, theoretically reputation depends on a *performance gap*¹³, which is defined as the difference between the agency’s past and current performance, while trust depends on an *expectation gap*, which is defined as the difference between society’s expectations from the agency and the agency’s actual performance. Measuring the performance gap entails a comparison between an agency’s performance at a certain point in time t and its performance at point in time $t+1$. This produces a

¹² Hetherington & Husser’s definition of trust: “*The ratio of people’s evaluation of government performance relative to their normative expectations of how government ought to perform*” p.313

¹³ My own definition is different from the initial definition of the “performance gap” in the Auditing Literature, where it originated; I consider the difference in past and current performance as the performance gap while the literature sees the difference between actual performance and expectations as the performance gap; Furthermore this literature sometimes uses performance and expectations gap interchangeably, which I do not;

comparison between two performance measurements in time, which ultimately is the performance gap. Unlike measuring the gap, which is quite straightforward, measuring performance of public agencies is much more complex. This is due to the multidimensional nature of bureaucracies' performance, which can be measured by several indicators belonging to various dimensions like output, impact, or outcome (Tallberg et al. 2016, Gutner & Thompson 2010). The expectation gap is slightly different: It entails a comparison between what an agency is expected to do compared to what it actually does (its performance). Thus, the expectation gap, which is most prevalent in the auditing literature, measures "*what the public expects and what it actually gets*" (Koh & Woo 1998, p.147). This means that people evaluate the agency with updates from actual happenings in real life (Nielsen & Krukow 2007, Jadbabaie et al. 2012) and thus create performance gaps and expectation gaps. In turn, these gaps can be seen as competing mechanisms that create legitimacy as shown in the upper right corner of Figure 1.1.

Legitimacy

Legitimacy, positioned in the upper right corner of figure 1.1, builds the last concept used in the theoretical framework. In a sociological sense, the definition of legitimacy has two fundamental characteristics that are salient in the literature: Legitimacy of an agency is defined on the one hand by believing in the rightful existence of an agency and on the other hand by a congruence with social norms. While the former part of the definition is at an individual level and might vary from person to person depending on individual opinion and experience with the agency, the latter part of the definition is at a system level and thus homogenous across a community. In other words, whether the existence of an agency is rightful might be more debatable from person to person while its congruence to general social norms in any given society should be the same for everyone in this society. These two characteristics of

legitimacy are emphasized due to Tyler's famous definition relating to the idea of "believing in the rightful existence of the agency", as he calls legitimacy "a psychological property of an authority, institution, or social arrangement that leads those connected to it to believe that it is appropriate, proper, and just" (2006, p.375), which has been widely accepted in the literature (Deephouse & Suchman 2008, Meyer & Scott 1983, Pfeffer & Salancik 1978, Suchman 1995, Buchanan & Keohane 2010, Kaina 2008, Jackson & Gau 2016, Hamilton 2006, Dogan 1992, Deephouse & Carter 2005, Levi et al. 2009). Moreover, I want to draw attention to the latter part of the definition—"congruence with social norms and values"—because it gives rise to no lesser agreement and attention in the literature (Parsons 1956; Dowling & Pfeffer 1975, Pfeffer & Salancik 1978; Aldrich & Fiol 1994; Brown & Deegan 1998, Pardo & Prato 2019, Jackson et al. 2012, Reiner 2010, Smith 2007). Hence, numerous definitions of legitimacy in the literature can be reduced carefully and described best by the two most widely used meanings: Legitimacy means that the larger part of a society's people accept the agency and its actions individually and that these actions are in line with the norms and values in society collectively.

If legitimacy is the rightful existence of an agency, the question is then: What creates legitimacy? Why do people obey an agency and consider it to be rightful and just? While legitimacy is initially given by the creators of an agency, an agency needs continuous support from society to keep existing (Brown & Deegan 1998, Kaina 2008). In a scenario where direct elections are absent, as in the cases of bureaucratic agencies, legitimacy needs a source other than electoral accountability. Recent literature stresses two other sources of legitimacy: Reputation and trust.

Trust over time has been shown to be one mechanism that not only creates but is actually indispensable for system legitimacy and political order (Lewis & Weigert 1985, Parsons 1963, Levi et al. 2009, Pardo & Prato 2019), while reputation, despite fluctuating over time, can be another mechanism creating legitimacy (Daugirdas

2014, Deephouse & Suchman 2008). This idea of trust and reputation as two mechanisms that create legitimacy, is interesting because it is slightly different from conventional reputation literature in PA:

While reputation and trust are often described as sources of authority (for reputation, refer to Carpenter 2010; for trust, refer to Frankel 1977), my focus here is on these two mechanisms that create legitimacy, which over time need to be “fed into authority” in order to uphold it (Carpenter & Krause 2014). While authority is the pure capacity to evoke compliance (Presthus 1960), legitimacy is the acceptance of the rightful existence of an agency and might evoke compliance through voluntarily abiding. As Presthus argues, authority is initially received formally, but requires nourishment from legitimacy to survive (Presthus, 1960). Hence, legitimacy is a necessary (but not sufficient) condition for an agency to claim authority—a modest difference compared to conventional literature that I want to highlight in this theory. In sum, and as mentioned, marginally deviating from conventional literature, I purposefully argue not that trust creates authority but that it is a mechanism that creates legitimacy, which is then needed for authority. Even though legitimacy and authority are conceptually similar, they are certainly not synonymous. Presthus (1960) defines authority as *the capacity to evoke compliance*, while legitimacy is the *acceptance of the rightful existence of an agency* (Tyler 2006) and needs to be fed into authority over time to guarantee its survival (Carpenter and Krause 2014). “*Authority without legitimacy would be authoritarianism*” (Pardo & Prato 2019; p.8). Hence, legitimacy is a necessary condition for authority in a democratic setting.

In light of the fact that there exists an emphasis in the literature on legitimacy, this dissertation aims to expand upon the existing work (Radaelli 2000, Majone 2002, Majone 2014, Coen & Katsaitis 2013, Scharpf 2009) and to explain its crucial importance in the case of the European Commission. The next section lays down

three rationales that explain why legitimacy has a critical role for the European Commission.

Why is legitimacy crucial for the European Commission?

First, because *the Commission requires compliance by ordinary citizens.*

The literature argues that an agency with legitimacy would gain compliance, whereas an agency without legitimacy can only achieve compliance through coercion and would be called authoritarian (Dogan 1992). An agency with legitimacy achieves voluntary compliance, which means that people follow its rules and abide by its laws voluntarily (Scharpf 1999, Levi et al. 2009, Grimes 2006, Kaina 2008, Pardo & Prato 2019, Tyler 2006, Arendt 1973, Weber 1978). Going back to the analytical framework, this means that an agency that works in multiple-policy domains and thus creates laws and rules for ordinary citizens needs legitimacy with the people to achieve compliance. On the other hand, an agency that operates in only a one-policy domain needs compliance only from the multiple audiences that it affects directly. Thus, legitimacy with the general public is more important for multi-purpose agencies such as the European Commission than for the FDA. To emphasize this point further, one can think of the following examples: One of the most significant legislative achievements of the Commission is the free movement of labor, whereby individuals can move and work freely within the EU. However, this freedom cannot be applied to every country even within the EU (such as countries that have not yet experienced the free movement of labor, like Croatia). Consequently, in order to work, this law needs compliance with both interest groups and ordinary citizens. The former need to comply and to avoid violating the law even if they would like to employ labor from a third country in a EU country, and the latter need to comply by not working in any country where they are not authorized to do so. Hence, both interest groups and citizens must comply for the regulation to work. In the case of the FDA, this is

different. Since the FDA mainly regulates which drugs enter the market, it relies more on compliance with interest groups but not as much on citizens' compliance. As long as interest groups comply, citizens automatically comply, since they can only buy the drugs that have been authorized by the FDA for sale on the market. Therefore, the Commission, which operates in so many versatile policy domains and thus affects all kinds of audiences, needs to be legitimate in the eyes of all these audiences - citizens and interest groups alike.

Second, because *legitimacy is a system-variable*.

The literature shows that legitimacy is a system-variable because it is an attribute that depends on the entire system rather than on one single entity or person working in this system (Dogan 1992, Pakulski 1986, Tyler 2011). As Dogan exemplifies, one police officer acting illegitimately does not necessarily translate into the police force being illegitimate. It presumably follows that if the FDA, which is part of the US government as a larger system, loses its legitimacy, it would not hinder the US government to act as a whole. Examples for this include the AIDS and cancer crisis in the 1980s (Carpenter 2010), where, despite the substantial legitimacy crisis of the FDA, the U.S. simultaneously experienced an increase in the trust in government (see appendix IX. Pew Research Centre Data during the Reagan Period). Moreover, the US government was still "legitimate enough" to go to several wars with society's support during that time (Grenada 1983, Libya 1986, Gulf war 1990). These examples indicate that the FDA is not at the system level and thus lower legitimacy does not threaten the system as a whole.

On the other hand, the Commission literally is *the* system, because it is a collection of agencies that act within the system. Whenever the Commission loses legitimacy, it poses a real threat to the entire system of the EU and can lead to severe outcomes. One such example would be Brexit, whereas the Commission played a central role

and its loss of legitimacy in the United Kingdom made the entire system crumble.

Third, because *the Commission requires input and output legitimacy.*

Emphasized by institutional scholars, a common theory emerged; arguing that a certain form of legitimacy is required, depending on the nature of policy (Lowi 1973, Majone 2002, Scharpf 2009, Coen & Katsaitis 2013). There are regulatory and redistributive policies, which need output and input legitimacy respectively. Output legitimacy is performance-based as it refers to the quality of the policy or the final outcome (Coen & Katsaitis 2013); it is sufficient for agencies performing regulatory tasks. Input legitimacy, however, is political as it refers to the level of public consensus (Majone 2002) and is required for agencies performing redistributive tasks. Since the Commission deals with not only regulatory but also redistributive matters, it is expected to need both forms of legitimacy, although merely output legitimacy is sufficient for the FDA to uphold its regulatory authority.

When combined, these three rationales—compliance by citizens, legitimacy as a system-variable, and the theory of input and output legitimacy—provide a collective justification for the amplified importance of legitimacy in the case of the Commission compared to the FDA or other conventionally studied single-purpose agencies.

The logical sequence highlights that legitimacy of the Commission is created through reputation or evaluation based on past performance and through trust or evaluation based on expectations and values. To support the first argument, legitimacy through reputation, Deephouse and Suchman (2008) argue that there are two sources of legitimacy—external audiences and the media (see also Ruef & Scott 1998, Baum & Powell 1995, Dowling & Pfeffer 1975), which can be both interpreted as actors that create reputation. The evaluation of the agency by these audiences, referred to as reputation in the literature, is one mechanism creating legitimacy.

To support the second argument, legitimacy through trust, Tyler (2006) argues that the most widely accepted definitions of legitimacy see trust as a part of and a requirement for it (similar definitions are given by Jackson & Gau 2016, Sunshine & Tyler 2003), whereas trust is a precondition for legitimacy (Rothstein 2003, Kaina 2008).

Even though the connection between legitimacy and trust has been well-developed in the literature, clearly identifying trust as a necessary condition for legitimacy of agencies and systems (Jackson & Gau 2016, Tyler 2006, Sunshine & Tyler 2003, Kaina 2008, Rothstein 2003, Pardo 2000, Pardo & Prato 2019, Dogan 1992, Levi et al. 2009), the connection of legitimacy to reputation is slightly less emphasized and more fuzzy (Deephouse and Suchman 2008, Deephouse and Carter 2005). Since legitimacy theory assumes that every institution, agency, and political order needs legitimacy in order to continue existing (Brown & Deegan 1998, Pakulski 1986, Lewis & Weigert 1985, Parsons 1956), it would be interesting to examine which one of the competing mechanisms—trust or reputation—is crucial for legitimacy, and how differently they affect the legitimacy of an agency. Even though the effects of the two mechanisms on legitimacy form an empirical question, the dissimilarities between the two concepts in connection with legitimacy form a theoretical question. Hence, differences between the two concepts can be theoretically analyzed and subsequently categorized into three main attributes, which are discussed in the successive sections.

1.3 Trust and Reputation: Three Crucial Differences

Trust and reputation are two fundamentally distinct concepts, whereby the former involves evaluation in light of normative expectations (Hetherington & Husser 2011, Abts & Heerwegh 2009) and the latter involves evaluation by comparing current and past performance (Shrum & Wutnow 1988, Fryxell & Wang 1994, Gioia et al. 2000, Gardberg & Fombrun 2002, Bergh et al. 2010). The two concepts are sometimes used in such extreme proximity that confusion arises between them. This comes from studies measuring reputation by trustworthiness (Rousseau et al. 1998, Burt & Knez 1996, Lee & Van Ryzin 2018), calling trust a reputational asset that is dependent on credibility (Davies & Cifuentes 2016, Fukuyama 1995, Smitka 1994) or describing trust as a consequence of good reputation (Brown 1998, MacMillan et al. 2005, Bustos 2021). Therefore, the two concepts sometimes seem closer than they are and as researchers use proxies to measure them, trust and reputation sometimes overlap. Notwithstanding, any scholar would very likely disagree about calling reputation and trust synonyms. In the following section I elaborate on three differences, which can explain why trust and reputation are fundamentally distinct.

1. Core beliefs versus past performance

First, trust is based on personal values or the so-called deep-core beliefs (Sabatier & Weible 2007, Matti & Sandström 2011), which are personal norms that are hard to change and are relatively constant over time. This suggests that only an alignment of the agency with these core beliefs can increase trust, which requires an adaption of the agency to the environment. Moreover, there may be a loss of system-level legitimacy if there is no alignment with deep-core beliefs in society. For the Commission, this is especially crucial as it operates at the system level. An example of this is the refugee crisis, wherein the fundamental question is whether to let refugees in. Assuming that the European Commission decides to not welcome

refugees anymore, and this fundamental stance deviates from the deep-core belief of society, the result would be the loss of legitimacy, because of the lack of alignment of the public's core beliefs with the Commission's actions.

Hence, trust—based on values—is different from reputation, which is based on performance or often-called output legitimacy (Coen & Katsaitis 2013, Majone 2002, Scharpf 2009). This legitimacy can be changed, not by adaptation to the environment, but simply by improvement relative to past performance. Performance is especially important for the FDA, but it is harder for ordinary citizens to evaluate the body and thus primarily concerns interest groups. An example of the emphasis on performance is the AIDS problem in 1988, as mentioned by Carpenter (2010) in his book. At that time, the FDA was under enormous pressure from ACT NOW (interest group movement of people with AIDS) to increase the speed of drug approvals; consequently, it introduced the Accelerated Approval Program in 1992. This change admitted faster allowance of clinical trials and a fast-moving response to the crisis, which increased the FDA's reputation and power, even in a difficult political era (the conservative Reagan era of the 1980s).

2. Social Norms

Second, trust and reputation are distinct in terms of their dependence on social norms. Trust is heavily dependent on social norms because it can only emerge and increase when the performance is in alignment with social norms, or with what society expects and contemplates to be right and just. As a result, trust can only work in the realm of salient issues, where citizens can observe actions and judge whether there is an alignment with norms. An example of this is the Commission's Regulation 2257/94¹⁴, or the so-called "Bendy Banana Law." Even though the question of a banana's curvature would normally be a clear interest-group topic, this issue gained

¹⁴ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:1994R2257:20060217:EN:PDF>

salience and allowed the entire public to judge this matter and its alignment with social norms. In this case, society at large decided that such a law deviated from social norms (negative judgement) and thus the trust in the European Commission decreased.

Reputation, on the other hand, is less dependent on social norms, as many instances of the FDA's approval of conventional drugs show. One such example is a form of Botox injection liquid called "Jeuveau,"¹⁵ which was approved in February 2019. Whether Botox injections are in line with social norms was not relevant in this case because of low public awareness and low salience. Mainly interest groups observed the clinical trials and simply a good performance of the drug was sufficient to legitimize it and thereby the agency.

3. Pluralism versus Elite-Pluralism

Finally, trust is distinct from reputation because it comports with the institution of polyarchy (Dahl 1978), which assumes relative equality and thus emphasizes individual perceptions and general public opinion as the main driving forces in a democracy. This idea of a pluralistic state is reflected both in the Commission's Transparency Act of 2011 and in the Commission's opinion polls, which are conducted on a regular basis.

Reputation, on the other hand, aligns better with Elite-Pluralism (Marsh 1983), which assumes that political outcomes are skewed toward perceptions, desires of interest groups, and powerful elites. In the case of the FDA, consulting is mainly done with special-interest groups and often does not involve the general public before final decisions (regarding drug approvals) are made.

These three distinctions between trust and reputation support the argument that the

¹⁵https://www.accessdata.fda.gov/drugsatfda_docs/nda/2019/761085Orig1s000TOC.cfm

two concepts are fundamentally dissimilar and require a clear theoretical division. Furthermore, previous sections explained why legitimacy through trust is crucial for the Commission even more so than it is for other public agencies. Working in many policy domains creates more media coverage and thus exposure to public opinion, which means that ordinary citizens form perceptions about the Commission in form of trust. The increased salience of the EC's actions exacerbates its dependence on public opinion instead of being mainly influenced by interest groups, as it is the case for conventionally studied bureaucratic agencies.

From theoretical framework developed before, the hypotheses of the dissertation emerge. Section 1.4 will explain in more detail how each hypothesis connects to the theoretical framework.

1.4 Hypotheses deriving from the theoretical framework

Essentially there are three broader categories in which the hypotheses are divided: First, H_1 describes the relationship of media coverage and the number of policy domains the EC works in. It serves as a premise of the theoretical framework, which is crucial for the subsequent hypotheses to develop and thus rather 'sets the scene'. Second, two hypotheses deal with media coverage and its effect on influencing policy for either special interest groups (H_{2a}) or the general public (H_{2b}). And third, two hypotheses investigate trust and reputation, whereas they test whether trust is based on values (H_{3a}) and reputation is based on performance (H_{3b}), as argued in the theoretical framework.

Hypotheses of the dissertation:

H₁: The number of policy domains in which the Commission operates influences media coverage over time.

H_{2a}: For general interest groups more media coverage is associated with a lower level of anticipatory lobbying action (activity) but a higher level of substantive lobbying action (influence).

H_{2b}: For special interest groups more media coverage is associated with higher anticipatory lobbying action (activity) but a lower level of substantive lobbying action (success).

H₃: Trust in the Commission is associated with normative expectations.

H₄: The Commission's reputation is associated with past performance.

Media-proportionality hypothesis

The starting point of the theoretical framework argues that there is a significant connection between working in more policy domains and consequently creating more media coverage. Section 1.2 has extensively elaborated on the logic behind this premise: Working in more policy domains increases the availability of news the agency creates and thus should also increase its media coverage. Given the position in the theoretical framework at the very beginning, this hypothesis rather serves as a premise and a condition for the subsequent hypotheses to develop: Because only if it is true, that being a *multi-purpose agency* increases *media coverage* and thus *awareness of ordinary citizens*, reputation might play a very different role for such multi-purpose agencies, than it plays for conventionally studies, single-purpose agencies.

The other four hypotheses (*H_{2a}*, *H_{2b}*, *H_{3a}* and *H_{3b}*) require further theoretical

elaboration and explanation, which the next sections will introduce.

Group-activity Hypotheses (H_{2a} and H_{2b})

As the Commission has developed into a multi-purpose agency over time and its media coverage has continuously increased, it is important to know whether increased media coverage affects the influence of public opinion vis-à-vis interest groups. In the theoretical framework I argue that lobbies and public opinion can be seen as competing mechanisms that influence policy and ultimately legitimacy of the Commission. But how are these two forces affected by media coverage? Could issue salience increase lobbies' power to influence policy vis-à-vis public opinion? Or does salience help public opinion more in shifting policy? As the Commission becomes a more and more observed actor and its policies become more scrutinized by the media, one important research question emerges:

Who profits more from this exacerbated issue salience: Interest groups or the public?

Interest groups, often also called lobbies, are collections of actors with three characteristics: A minimum level of organization, the aim to shape policy and absenteeism of competing in elections (Dür & Mateo 2014, Beyers et al. 2015). Even though interest groups are present in any political system, a comprehensive investigation has been neglected for a long time in the American literature, which initially focused only on case studies and few policy domains (Baumgartner & Leech 1998, p.39-40). Bunea and Baumgartner (2014) show in a systematic literature review that this shortcoming is also apparent in European literature, which has started focusing on interest groups only since 2007, making it a “*niche field within political science*” (Beyers et al. 2015, p.1103). Moreover, the scarceness of interest

group research resulted in a picture of lobbying as a complex and diverse process, which is difficult to generalize (Bunea & Baumgartner 2014).

Despite endeavors to systematize interest group research, two dominant theories, which intend to explain the lobbying process, shape the literature: First, Bouwen's influential exchanges of resource theory (Bouwen 2002), which argues that lobbying is a bi-directional process from which not only interest groups profit by influencing policy, but also political organizations by receiving information. And second, demand- and supply-side approaches, which claim that lobbying is determined by either demand, dependent on nature of policy, market size and structure (Broscheid & Coen 2007) or supply, dependent on resources available to interest groups (Lowery & Gray 1995). Even though demand-side approaches have gained much more attention in the literature, Berkhout et al. (2015) find empirical evidence for the supply-side approach only, thus making the usage of demand forces as control variables plausible.

Building on these fundamental ways of thinking about interest groups, the literature is also marked by an on-going debate about lobby types and whether they matter or not. Despite the fact that a minority of studies attest that "type" does not matter for lobbies' influence (Mahoney 2004) and its media attention (De Bruycker & Beyers 2015), the majority of scholars have shown that interest group type is a key variable for success (Willems and De Bruycker 2019, Dür et al. 2015). The reason why there seems to be a disagreement among scholars can be explained by the variation in the used outcome variable: While some studies examine the effect on "lobbying success", others use "lobbying influence", "activity", "mobilization" or "access". As of my knowledge no clear conceptual differentiation between these different lobbying actions has been made in the literature thus far.

Therefore, this work addresses this theoretical gap by developing a distinction between lobbying actions. Taking conventional definitions into consideration, I argue

that it is possible to draw a line between frequently used dependent variables such as mobilization, activity, influence etc. and divide them into two groups of concepts, which are characterized by their nature of action and connection to policy. Consequently, I differentiate between “*anticipatory lobbying actions*” and “*substantive lobbying actions*”. Anticipatory lobbying actions do not influence policy actively but are nonetheless a *sine non qua* for influence (Bowen 2002, Austen-Smith 1995, Coleman & Wyn 1988) and include lobbying activity, mobilization, and access. Henceforth, these lobbying actions are necessary but not sufficient conditions for influence (Coen 2007, Dür & Mateo 2014, Rasmussen et al. 2014). On the contrary lobbying influence and success are substantive lobbying actions because they assume (causal) effect on policy (Dür et al. 2015). Even though Dür et al. (2015) make an additional distinction between influence and success - claiming that only influence is causal, thus affects policy, while success is simply the distance from the desired policy outcome - I will use these concepts interchangeably as both are ways of describing a “push towards desired policy outcome”, hence substantive lobbying action. Table 1.2 demonstrates and explains the concepts “anticipatory lobbying action” and “substantive lobbying action” and their differences.

Table 1.2: Lobbying as dependent variable: Anticipatory versus substantive lobbying

	Anticipatory lobbying action	Substantive lobbying action
Main feature	Trying to influence policy	Actually, influencing policy
Example variables	Access, mobilization, activity	Influence, success

Despite the different ways of using lobbying action, there are also dissimilarities across work when it comes to interest group types. To sum them up there are

basically two sorts of interest group classifications, which are most salient in the literature: One such classification has been a more recent development by Willems and Bruycker (2019), who base their categorization on the type of constituency of an interest group. According to their work, it can be differentiated between representative concentrated interest groups, which have narrow and clearly defined membership (Salisbury 1984), representative diffuse interest groups, which are more broadly defined by characteristics of members, and solidarity organizations, which are loosely affiliated members (Halpin 2006, Jordan Maloney 2014). Another slightly reduced classification by Dür and Mateo (2014) is a two-group conceptualization, which is based on the differentiation between business interest and public or general interest, defined as interests which are not directly related to the supporters' professions and reflect public priorities (Dür et al. 2015). This binary categorization is more intuitive, because it can be roughly related to professional organizations' interest on the one hand and the public's interest on the other hand (Coen 2007, Greenwood 2003), which are two forces that play a crucial role in the theoretical framework of this dissertation. Therefore, I will also use this classification when testing the hypotheses, rather than using the more detailed categorization by Willems and Bruycker (2019).

Taking several studies regarding interest groups' actions in the European Union into account, an obvious enthusiasm to explain when and why their actions matter has evolved. With this aim most work has thus treated interest group actions – influence or access – as dependent variable. Different independent variables that could explain interest groups' actions have been tested and include the type of group (Dür et al. 2015, Willems & De Bruycker 2019), the type of policy domain or policy good (Coen 2007, Berkhout et al. 2015) and the level of contradiction within policy (De Bruycker & Beyers 2015). Interestingly the interest group literature has paid little attention to media coverage as potential explanatory variable and only a hand full of studies

investigates the media more broadly: De Bruycker and Beyers (2015) for example show that the type of interest group does not affect media coverage of the group, thus treating media as the dependent variable. Willems and De Bruycker (2019) include media coverage in their work however, to explain congruence with public opinion, not its effect on interest group actions; and other scholars use media coverage as control variable (Beyers, Dür et al. 2015). As far as I am concerned no study explicitly examines media coverage's effect on interest groups' influence vis-à-vis public opinion.

Notwithstanding this theoretical and empirical gap in the literature, there are several theoretical notions pointing in this direction. To start with, it is important to be reminded of the principle idea in any democratic system that public opinion matters and ideally shapes policy (Burstein 2003, Gilens & Page 2012). Public opinion has been defined as the general interest of the citizenry (Fraser 2007) or as the aggregate of all individual views (Stimson 2015) and is often seen as counterpart to interest groups' opinion (Burstein 2003). Consequently, I argue public opinion and lobbies can be looked at as two wrangling forces competing for policy influence. However, in many cases interest groups' and citizens' preferences can also be overlapping. Recent research demonstrates that driving forces for congruence between these two forces can be either lobbies' constituencies, where more diffuse constituencies increase congruence (Flöthe & Rasmussen 2018) or salience (Willems & Bruycker 2019).

Media coverage has shown to serve as a good proxy to measure issue salience (Willems & De Bruycker 2019, Beyers et al. 2014), as it basically creates salience, which then in turn generates a more crystalized public opinion of an issue (Burstein 2014, Ciuk & Yost 2015). Even though earlier findings demonstrate that media coverage decreases interest group influence (Schattschneider 1960, Salisbury 1984) more recent work claims the opposite (Rasmussen & Carroll 2014, De Bruycker &

Beyers 2015). While some reasons for different results in the literature can be explained by the fact that media's effect on interest group activity is conditional on the issue (Danielian & Page 1994) its controversy (De Bruycker & Beyers 2015) and type of interest group (Willems & Bruycker 2019), I offer a more detailed explanation for the relationship between media coverage and lobbying:

I argue that it is crucial to differentiate between anticipatory lobbying action (activity) and substantive lobbying action (influence) and that both concepts are not only theoretically but also empirically distinct. Their dissimilarity is also visible in how they are affected by media coverage, which can be summarized in the following hypotheses:

H_{2a}: *For general interest groups more media coverage is associated with a lower level of anticipatory lobbying action (activity) but a higher level of substantive lobbying action (influence).*

H_{2b}: *For special interest groups more media coverage is associated with higher anticipatory lobbying action (activity) but a lower level of substantive lobbying action (success).*

These two hypotheses can be explained by the following line of reasoning: Media coverage increases salience and thus pronounces public opinion about an issue, which thus decreases the need for general interest groups (public opinion groups) to lobby for their preferred policy outcome (anticipatory lobbying action). However, simultaneously salience increases the weight of public opinion vis-à-vis lobbies for the public agency and thus makes general interest groups more successful in influencing policy (substantive lobbying action). This argument is coherent with the more general line of thought describing the European Commission as a strategic

actor, who mainly wants to listen to citizens when issues are more politicized and public (Tallberg 2002, Pollack 1997). For special interest groups the opposite holds: When issues are more salient, public opinion is stronger and more visible and thus the need to lobby for the preferred policy of special interest groups – which is on average on the other side of the policy spectrum - is higher. However, a stronger public opinion created by issue salience conversely decreases special interest groups' likelihood of success.

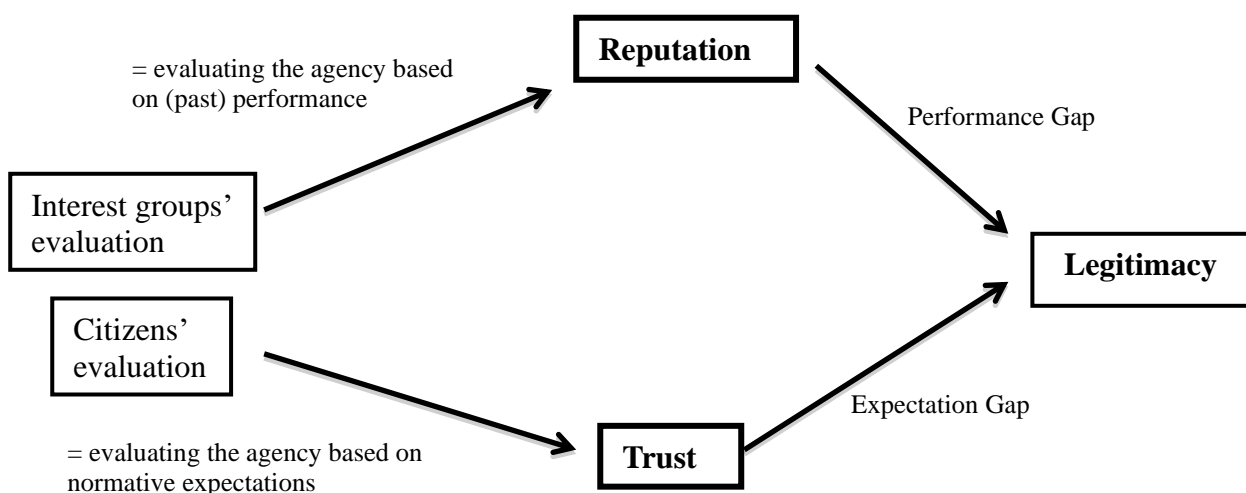
To integrate this idea into my theoretical framework: In a bureaucratic agency like the Commission, which operates in many policy domains and thus gains more media coverage, the influence of public opinion is more important than influence of interest groups.

In summary, the argument underlying H_{2a} and H_{2b} claims that media coverage is decisive for the relative importance of interest group action vis-à-vis ordinary citizens, who are represented by general interest groups. Theoretically more media coverage increases issue salience, which is the relative importance of certain policy issues among the public (Beyers et al. 2015) and thus increases the importance of public opinion relative to special interest groups' pressures. This can be explained by the intuitive notion, that the public will only get involved and thus gain importance or influence in issues that they know of, which are determined by media coverage. Henceforth, more media coverage increases the public's relative importance, while less media coverage decreases it and conversely increases interest groups' importance. This line of reasoning constitutes the heart of the theoretical argument, as it asserts that a multi-purpose agency like the European Commission, working in many policy domains, will experience more media coverage and thus is influenced more by citizens than interest groups.

Trust and reputation hypotheses: Different evaluation mechanisms (H₃, H₄)

The next part of the theoretical framework introduces a distinction between trust and reputation. This part also constitutes the central objective of this dissertation: An elaborate explanation of reputation and the concept's meaning in the context of the European Commission, which is - unlike other conventionally studied bureaucracies - a *multi-purpose* agency. Former sections have shown that the simple fact of working in many policy domains can lead to more media coverage. This is crucial, because media coverage influences two different aspects that are important for the Commission: Public opinion and organized interest. The theoretical argument argues that these actors use two distinct, competing mechanisms, which ultimately create legitimacy. While reputation based on performance is the mechanism that creates legitimacy in the eyes of lobbies or special interest groups, it is trust based on normative expectations, which does so in the eyes of citizens or public opinion. Figure 1.2 summarizes the argument at the core of the theoretical framework in a nutshell: Reputation is the mechanism linked to interest groups while trust is the mechanism linked to citizens, and both combined determine eventually legitimacy of the European Commission.

Figure 1.2: Mechanisms creating the Commission's legitimacy



It is the purpose of the next sections to scrutinize exactly this core argument of the dissertation in a more detailed theoretical manner.

Reputation

Public administration defines reputation most famously as “*Set of beliefs of an organization’s capacities, intentions, history, missions that are embedded in a network of multiple audiences*” (Carpenter & Krause 2011). Within the public administration literature this interpretation of reputation has experienced wide resonance in multiple pieces of work (Waeraas & Byrkjeflot 2012, Gilad et al. 2013, Waeraas & Maor 2018, Busuioc 2016, Ingold & Leifeld 2016) and has been universally accepted in the field. The agreement in the literature is exceptionally strong regarding reputation’s core elements: Beliefs, multiple goals, and multiple audiences (Carpenter 2010). This support is resembled in the fact that work deviating from Carpenter’s definition is not only scarce but also does not disagree with the concept’s core elements (for two examples: Maor 2012, Lee & Ryzin 2018). However, also in other fields reputation is a widely used term but has been loaded with many varied and mixed interpretations. With the aim of giving a global picture of the term reputation, the following section will introduce its meaning across three major disciplines: Public Administration, Business Administration and Political Science.

Business Administration (BA) studies have recognized reputation as a relevant concept much earlier¹⁶ than Political Science (PS) and Public Administration (PA). Unlike in the latter two, BA always emphasized the *general public* when measuring the concept reputation (Barlow & Payne 1949, MacMillan et al. 2005, Woodward & Roper 1951, Zyglidopoulos & Phillips 1999, Mahon & Waddock 1992), even if this “general public” varied in its size ranging from smaller (Christian 1959, Shrum &

¹⁶ Contemporary business studies (Money et al. 2017) point back towards the public relations literature of the late 1940s, which was arguably the beginning of this discussion.

Wutnow 1988, Woodward and Roper 1951), to larger (Fombrun & Shanley 1990) subgroups of the public. More recent BA literature concerned with reputation is trademarked by two important shifts: On the one hand it changed from a company-centric view, often referred to as the resource-based view of reputation (Barney 1991, Hall 1992, Deephouse 2000), to a perception-based view emphasizing individuals' perceptions. On the other hand, reputation research has started to shift spatially to the European continent (Macmillan et al. 2005, Walsh & Wiedmann 2004, Van Riel & Fombrun 2002). Even though modern research has still not reached full agreement upon its exact definition in BA (Fombrun & Van Riel 1997; Davies et al. 2003, Gotsi & Wilson 2001), Fombrun et al. (2000) offer a universally accepted definition calling reputation a "*collective assessment of a company's ability to provide valued outcomes to a representative group of stakeholders*" (p.243). Combined with other important work in this field (Zyglidopoulos and Phillips 1999; Gotsi & Wilson 2001, Deephouse 2000, Gardberg & Fombrun 2002, Rindova et al. 2005) one can identify three main building blocks of reputation: multiple stakeholders, perception, and time.

The Political Science literature and its view of reputation might be just as important for the theoretical discussion here, considering that it is even more profoundly connected to Public Administration. The most obvious difference between reputation in BA and PS is that the latter has not paid as much attention to reputation¹⁷ as BA has. Out of the few studies dealing with reputation in PS, most of them are done in the sub-discipline of International Relations, which is arguably not part of Political Science, but rather its own discipline by now. This shows an unanticipated shortage of inquiries regarding reputation in Political Science, not only theoretically but also empirically. Also, reputation in Political Science is surprisingly different, as the

¹⁷ Looking at the two most prominent Scientific Journals in the discipline and using "reputation" as the key word, which has to be present in the articles' abstracts, the American Political Science Review gives only 51 and the American Journal of Political Science even less, unexpected 16 results.

concept is an independent variable initiating a game-theoretical approach (Jensen & Johnson 2011, Renshon et al 2018) rather than an outcome variable. Influenced by this literature, reputation is often considered as the “reputation to resolve” and hence mainly used in International Relations and conflict studies (Guisinger & Smith 2002, Mercer 2010). It is in this discipline also closer to economists’ signaling theory, as reputation is often described as a signal to emit the image of being powerful (Axelrod & Keohane 1986, Stein 1984, Truex 2014). However, the concept does overlap with Business Administration when it comes to its main building blocks: Time (Dafoe et al. 2014) perception (Scammell 1999, Truex 2014) and multiple stakeholders (Hale & Colton 2017, Renshon et al. 2018).

Even if the public administration literature has developed its own conceptualization of reputation, it has some resemblances with definitions from PS and BA, too. The major differences of reputation in PA compared to the other disciplines are the concept’s recentness and popularity. Since Carpenters seminal work “*Power and Reputation*”, the number of supporting work for his famous definition has increased innumerable (Waeraas & Byrkjeflot 2012, Gilad et al. 2013, Waeraas & Maor 2018, Busuioc 2015, Ingold & Leifeld 2016), always emphasizing the “beliefs of multiple audiences” as core of reputation. Besides this, Carpenter emphasizes that any definition of reputation must consider that an agency has not only multiple audiences, but also multiple departments, which are sometimes competing with each other; that an agency has multiple goals; and that citizens care about the overall output¹⁸. Furthermore, reputation is not one-dimensional and can be divided in performative, technical, legal, and moral reputation (Carpenter & Krause 2014). While performative reputation is determined by competence and efficiency, technical reputation refers to skills and capacities in the Weberian sense of expertise independent of performance.

¹⁸ see Carpenter & Krause 2011; note: even though they mention the overall output they do not emphasize its crucial importance;

Procedural reputation is the adherence to rules and norms and moral reputation is linked to honesty and the protection of constituents. It is reputation's fairly complex and multi-dimensional nature that ultimately creates a number of political assets for any bureaucratic agency such as autonomy, authority, power, public support and legitimacy (Carpenter 2010, Carpenter & Krause 2011, Gilad 2008, Maor & Sulitzeanu-Kenan 2012, Maor 2010, Wearaas & Byrkjeflot 2012).

Moreover BA, PS and PA show numerous commonalities when it comes to grasping the very core of reputation. From these a general agreement about the concept's broader definition and its main building blocks, has emerged, which can be summarized by three common denominators: Multiple audiences, perception, and time. The only area where definitions still suffer from discrepancies - not only across disciplines but also within PA alone - is the precise interpretation of each building block, which raises the questions (Huth 1997): Who are the relevant multiple audiences? And how can we measure perception?

Before the paper ventures a deeper immersion into these fundamental questions for researching reputation in PA, an overview of the second mechanism (trust), which creates legitimacy, is introduced.

Trust

The theoretical concept *trust* has originally emerged from sociology (Lewis & Weigert 1985, Rousseau et al. 1998) and transcended into other social sciences without losing its four core features: Being essentially relational and evaluative while relying on expectations and perception. In order to clarify the concept's richness and its four-dimensionality, the following sections will elaborate on these in more detail.

The first feature, which is trust's *relational core*, is most simply described with the abstract notion by Bauer and Freitag (2018, p. 15-16), in which "truster A trusts a

trustee B with regard to some behavior X in context Y at time t". Especially the first part involving A trusting B describes trust as socially embedded among actors (Lewis & Weigert 1985, Rousseau et al. 1998, Bouckaert 2012). It is the nature of these actors - either being individuals or institutions - which separates social or general trust from political trust (Uslaner 2018). Unlike social trust, which expresses a relationship among individuals, political trust happens between citizens and institutions, describes the confidence in the reliable functioning of these institutions (Berg & Dahl 2019) and is more frequently studied in public administration (Bouckaert 2012). In this dissertation the focus lies particularly on political trust, which is an essential feature for any abstract political system to function (Berg & Johansson 2020, Lewis & Weigert 1985).

Besides being relational, the second feature characterizing political trust in many definitions is *evaluation*. Scholars agree that political trust is created through the evaluation of institutions (Hetherington & Husser 2011, Seyd 2014, Van der Meer 2018). However, meanwhile types of criteria on which any evaluation is based on have gained significant attention by the literature (e.g. Dalton, 2004; Hibbing and Theiss-Morse, 1995; 2001; Norris, 2011; Zmerli and Hooghe, 2011), the way in which evaluating can be done is remarkably understudied (Seyd 2014, Van der Meer 2018). As argued in my theoretical chapter, logically, any evaluation has to be done with reference to something else, which calls for the requirement of some set of standards or reference point.

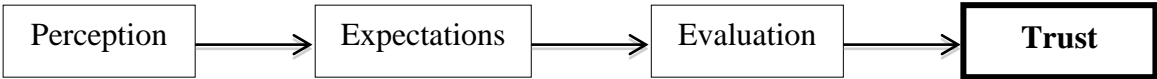
This reference point is where the third core feature of trust fits in: *expectations*. The political trust literature identifies "expectations" as the main reference point on which any evaluation is made on (Miller 1974, Hibbing & Theiss-Morse 1995, Hetherington & Husser 2011, Van der Meer 2018) and not meeting expectations as the root cause for declining trust (Abts & Heerwegh 2009, Van der Meer 2018). Expectation, however, is itself not a one-dimensional concept and can be divided into anticipatory

expectation, which describes the prospect of what *will* happen, and normative expectation, which describes the prospect of what *should* happen (Van der Meer 2018). The proximity between these two forms of expectations, the fact that normative expectations are closely related to socio-political values (Uslaner 2018) and the complexity of empirical tests for these concepts create a scarcity when it comes to research of expectations in the trust literature. In fact, expectations and values are “*missing links in most, if not all, macro- and micro studies on political trust*” (Van der Meer 2018, p.601).

Unlike expectations, which are rather understudied, *perceptions*, which make the fourth core feature of trust, have been more heavily investigated. Perception is insofar relevant, because perception of an event has shown to predict trust better than the actual happening of events does (Berg & Dahl 2019). Moreover, several studies have shown that subjective perception influences trust significantly (Chanley et al. 2000, Citrin and Green 1986, Elinas and Lampranou, 2014), whereas evidence for actual events influencing trust (as opposed to perception) is rather mixed (Van der Meer 2018).

Following this short introduction of the four core features of trust – the relational core, evaluations, expectations, and perceptions – figure 1.3 presents a logical sequence, which explains their interrelations as a chronological decision-making process.

Figure 1.3: Core features of (political) trust



To explain this process shown in figure 1.3: First actor A *perceives* (actions by) actor B, then compares the perceived to his/her *expectations*, which then creates an

evaluation. This evaluation then determines trust. Even though this logical sequence can be represented quite abstract and simplified, it is each concept's complex definition and interpretation, which makes researching trust still challenging and not straightforward. The best evidence for the general level of difficulty in trust research, are the gaps in the literature, which identify several questions, that have either not been answered yet or even not been investigated. Such shortcomings include mainly topics like the evaluative nature of trust (Uslaner 2018), the role of expectations and values (Van der Meer 2018) and trust in other contexts such as international organizations for example (Brewer et al. 2018).

This dissertation addresses specifically the gap of trust's evaluative nature and its connection to values and expectations. With this aim the subsequent section will develop the central theoretical argument, which constitutes the main theoretical contribution and the heart of the dissertation.

Trust and reputation: Overlapping versus differentiating approach

Actor, action, and evaluation

Reputation is a *“set of beliefs of an organization's capacities, intentions, history and missions that are embedded in a network of multiple audiences”* (Carpenter & Krause 2011). Trust on the other hand is an evaluation by actor A about actor B (or actor B's action) based on expectations. Both concepts have in common, that they use the input of “perception”. Even if the trust literature uses the term “perception” more explicitly, also the reputation literature refers often to perception as a term that captures “beliefs” (Maor 2010, Daugirdas 2014) and attempts to measure beliefs by asking about “overall perceptions” of agencies (see Lee & Van Ryzin 2018). Therefore, one can conclude that both concepts are initially created through perception of an actor. However, perception is not the only aspect, which they have

in common and many pieces of work show even more connectedness between trust and reputation, which increases the difficulty to distinguish the two concepts. With the aim to distinguish them more clearly, I argue that three conceptual differences between trust and reputation exist: Type of actor, type of action and type of evaluation. Following these conceptual differences, I create a “differentiating approach”, which is a conceptualization of both - trust and reputation - based on the distinctions between them. This differentiating approach should make their divergences more obvious and builds on the following questions:

Who perceives (actors)? What does she/he perceive (actions)? How is this evaluated (evaluation)?

Actors

The statement “*It matters not only how a polity performs [...] but also who evaluates this performance*” (Van der Meer and Hakhverdian 2017, p.85) accentuates the relevance of the actor in any perception. Not surprisingly it is well known that certain attributes “lay in the eye of the beholder”, or the actor who perceives.

When it comes to actors, I argue that reputation relies on the idea of multiple audiences, which are distinct organized collectives that have different weights and are not equally relevant depending on the issue (Busuioc & Lodge 2015, Busuioc 2015, Rimkute 2020, Rimkute 2018). Additionally, these audiences are often referred to as organized groups, which have the capabilities to overcome collective action problems and voice their opinion in a collective fashion. Conventionally reputation talks about perceptions of different groups, rather than the public in general. In fact, thus far only one reputation study uses the perception of ordinary citizens to measure reputation (Lee & Van Ryzin 2018). Opposed to the general public, which is more often used in trust studies, the frequently used “multiplicity of audiences” in reputation studies creates the possibility to have different reputations with several audiences,

and consequently what matters is not the collective reputation but the right reputation with the right audiences. Therefore, I argue, that the multiplicity of audiences with distinct weights is the first major difference between reputation and trust. To clarify this difference, an example would be the European Research Council Executive Agency (ERCEA), which is an executive agency of the European Commission that funds research projects across Europe. Its audiences can be summarized (among others) by researchers (grantees), universities and member states, who pay for the ERCEA indirectly through the multiannual financial framework of the European Commission. While a good reputation with member states could be guaranteed by funding many scholars from a balanced and representative sample of member states, this can stay in conflict with good reputation with scholars, who value funding for good projects more, irrespective of the member state country. In this case the agency has to weigh which reputation is more important: the reputation to foster inclusion of all member states and funding them equally or the reputation purely based on scientific excellence. Based on the required reputation the agency then sets the rules for funding. In this real-life example the ERCEA chose the latter and has not introduced member-state based quotas for funding, even though their funding is very unbalanced because younger member states are much less frequently funded. Instead the agency decided for purely science-based funding and a reputation for scientific excellence rather than national inclusion.

“Who perceives” is a different issue for trust. Trust relies on the idea that each individual can trust or distrust, as it is a simple, intuitive evaluation process. In other words, trust involves literally “everyone on the street” and has been traditionally an individual-level measure in the literature. Unlike dealing with audiences, which have different weights, the trust literature deals with aggregate trust measures where each individual is counted with the same weight or a representative sample. The reason why individuals’ perceptions still matter and why these still have power over an

agency even without being organized in groups is that collective action is facilitated via democratic mechanisms in which trust can be – even if not explicitly – voiced (Hooghe 2005). This creates one single audience constituted by “the people”, which is one (majoritarian) actor rather than a multiplicity of audiences. Contrary to reputation, I argue that trust relies on the majority population as one actor and not on diverse audiences who weigh differently. The Commission as a whole would be an example for an agency dependent on the perception of one aggregate audience, which is typical for trust, because its audience is the whole European people, who can through trust guarantee the survival of a solid system (Lewis & Weigert 1985, Listhaug & Jakobsen 2018). Instead of the requirement for “right perceptions of the right audiences”, trust is more universal, as it can be generated by everyone and needs perceptions across all citizens, who are affected by a multipurpose agency.

Actions

The second distinction between reputation and trust lies in the question “what is perceived?”

The reputation literature emphasizes on performative, technical, legal-procedural, and moral aspects, which can be perceived and create four forms of reputation (Carpenter & Krause 2011). However, this four-dimensional nature of reputation could not yet been proven empirically, and a more recent study suggests that audiences might only perceive performative and moral aspects of public agencies’ actions (Capelos et al. 2015). Furthermore, “what is perceived” is conditional on the audience (Overman et al. 2019) and simultaneously on the type of agency whereas for most bureaucratic agencies the “*emphasis on technical dimension is overly pronounced*” (Rimkute 2020, p.391). From that it is conclusive that reputation relies on the perception of every action an agency performs. The reputation literature does not explicitly state which actions are relevant, even though it points in the direction

that depending on the agency some of the four aspects (performative, technical, legal-procedural, moral) are more important than others. I follow the approach by Overman et al. (2019) and argue that the four dimensions can be collapsed into two: performative and moral, whereas performative includes also technical actions and moral includes also legal-procedural actions. I argue that reputation is built on actions that are performative (and technical) while trust relies more on moral (legal-procedural) aspects. Testing whether reputation is indeed more strongly linked to performance is rather recent in the literature and the result heavily dependent on the agency's institutional logic and its policy scope (Krause & Douglas 2005, Overman et al. 2019, Rimkute 2020).

The trust literature describes relevant actions for trust even less explicitly. It seems that performance, because it is the easiest to measure out of all actions, has therefore also gained more attention than other actions. In fact, performance and its effect on trust have been under investigation already since the NPM movement (Hood 1995, Yang & Holzer 2006, Uslaner 2018, Newton et al. 2018, Linstead & Jakobsen 2018). And even though studies try to show that perceived performance influences trust positively (Christensen & Laegreid 2005, Van Ryzin 2015) while actual performance has proven to have no clear effect on trust (Seyd 2014), the causal effect of performance on trust has never been empirically proven (Laegreid 2017). In fact, the relationship of performative actions and trust is far from straightforward (James 2018, Van der Walle & Bouckaert 2003, Van Ryzin 2007, Yang and Holzer 2006, Berg & Johannson 2020). And whether performative actions or other actions determine trust is hard to tell, as survey questions about trust never explicitly mention which action it is based on. This lack of reference to a precise form of action is most visible in trust's definition as the "*willingness of a party to be vulnerable to the actions of another party based on the expectation that the other will perform a particular action important to the trustor*" (Mayer et al., 1995, p. 712) - a

statement, which describes “the action” as basically any action, be it performative or moral.

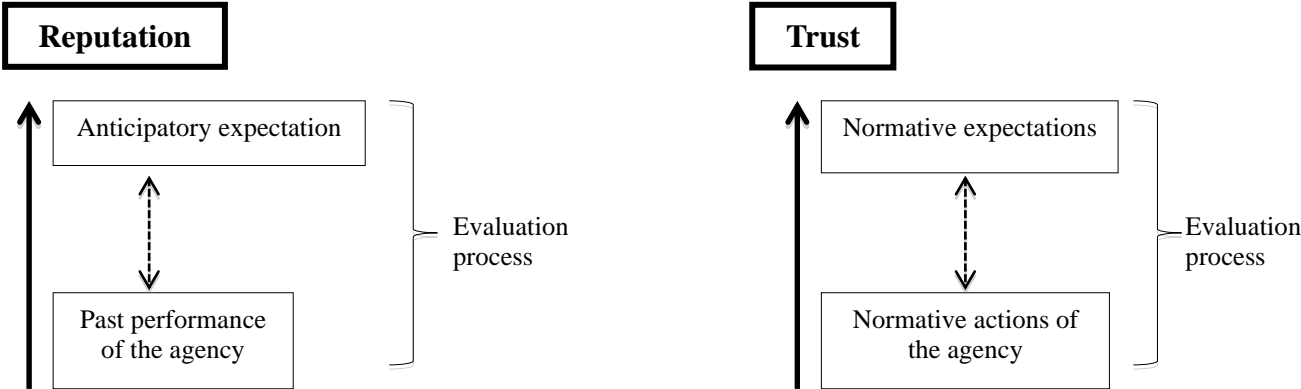
Considering the studies of both concepts, it is evident that most work draws on performative actions for *both* reputation and trust. I argue however, that this emphasis might exist due to the fact that performance is one action that can be relatively easily measured in comparison to moral aspects. Even though the literature so far has only tried to show that reputation and trust seem to rely on the perception of the same actions, I argue that the underlying actions on which the concepts are based on are fundamentally different, whereas reputation is based on performative and trust on normative aspects of actions. Therefore, both concepts are not only generated by different types of actors but are also dependent on two different types of actions. Additionally, I argue, trust and reputation are also created through different types of evaluations of these actions, as the next section explains.

Evaluation

The main argument relies on the idea that evaluation is the core difference between reputation and trust. As argued in my theoretical chapter, evaluation has to be done always by comparing something to some point of reference. This “something” is normally (an aspect of) an action that can be for example performance, efficiency, morals or values and the point of reference is always an expectation. Henceforth, the criterion on which the point of reference is based on differentiates reputation from trust most explicitly and is simultaneously least studied in the literature. Relying on the distinction by Van der Meer (2018) figure 1.4 demonstrates: Reputation relies on an evaluation process where performance is compared to “anticipatory expectations”, defined as what the agency *will* do. Trust on the other hand, relies on an evaluation process where normative aspects are compared to “normative expectations”, defined as what the agency *should* do. It is the aim in the subsequent paragraphs to explain

this in more detail by examining trust and reputation’s evaluation processes and their differences respectively and fill the gap in the literature by shedding light on evaluation as a crucial process.

Figure 1.4: Evaluation behind trust and reputation



Reputation relies on “beliefs” about bureaucratic agencies, but only very recently a paper by Lee and Van Ryzin (2018) has managed to measure these beliefs. However, the authors’ survey study and its design do not capture the evaluation behind the process of “forming beliefs”, simply because that is out of the study’s scope. To my knowledge there is only one piece of work by Overman et al. (2019), which starts to grasp the evaluation-process behind beliefs in reputation studies. This work demonstrates that the aspect of an action to be perceived depends on the institutional logic and goals of the agency. Meanwhile the reference point to which this observed aspect (action) is compared to, is an expectation created through past experience. Even though this is the first empirical study regarding evaluation in reputation, and thus an introductory step to fill the gap in the literature, it tries to explain evaluation behind beliefs. The results of this study are in line with my theoretical argument, which claims that reputation is created through the evaluation of an agency based on past performance. From that follows the research question:

Is Reputation based on past performance?

Like in the reputation literature, also in the trust literature the “*evaluative nature of political trust has been remarkably understudied*” (Van der Meer, 2018, p.600) and thus constitutes a theoretical and empirical gap. Very little attention has been given to the process of evaluation (Seyd 2015), even if the concept appears in most definitions of the term (Easton 1975, Hetherington & Husser 2011, Uslaner 2018, Van der Meer 2018). Generally, one can differentiate between two forms of evaluations: short-term and long-term evaluations. While short-term evaluations create trust at a superficial level and specific support for specific issues, long-term evaluations create a more fundamental and stable form of trust and diffuse support for the system (Easton 1975). Furthermore, evaluations are based on expectations, which can also be divided in two forms: anticipatory and normative expectations, describing what *will* and *should* happen respectively (Van der Meer 2018, Hetherington & Rudolph 2008). I argue that trust relies on an evaluation based on normative expectations; meanwhile anticipatory expectations are similar to expectations based on past performance and thus create reputation. From that follows another research question:

Is Trust based on normative expectations (values)?

The following example can explain the difference between the two forms of expectations and thus the two evaluation processes of reputation and trust: Starting with *anticipatory expectation*, an actor who perceives for example the European Central Bank’s (ECB) actions over time, creates expectations about the institution’s actions. The actor’s anticipatory expectations, which are based on past performance, would say that the ECB would probably introduce quantitative easing (QE) in times of crisis, as it has done so before. If this is the case, and actual actions or performance

coincide with anticipatory expectations, the actor would create a certain reputation about the agency, which is neither good nor bad but rather a reputation for “something”, in this case for introducing QE and thus increasing inflation slightly in times of crisis. Even though the actor can rely on the agency acting in a certain way, this does not necessarily mean the actor trusts the agency, but he simply creates a reputation. On the contrary: The actor’s *normative expectations*, which are based on values, could for example say that the ECB should not introduce QE because the actor is fundamentally against this type of policy. If then in times of crisis the ECB introduces QE and the ECB’s actual actions do not coincide with the actor’s normative expectations, the actor would not trust the agency, because he thinks the ECB *should* not act that way, even though she/he expected that the ECB *will* act that way.

To make the argument a little clearer: Imagine actor A and actor B, who have distinct political and socioeconomic standpoints, on which their distinct normative expectations are built. Taking the example of the United States and its president, imagine actor A is fundamentally against immigration into the States while actor B is on favor of immigration. Considering that both actors observe the U.S president over time, both actors would probably have the same anticipatory expectations of the U.S. president’s action, based on past performance. This means, both actors have the same opinion when it comes to what the president *will* do, for example that he will reduce or contain immigration. If then the president’s performance coincides with these expectations, he keeps his reputation for nationalist-protective foreign policy. Now consider both actors’ distinct normative expectations and imagine the president meets actor A’s normative expectations, which are against immigration, not however actor B’s, which are in favor of immigration. This would result in A trusting the president while B would not. In other words: the actor fundamentally against immigration trusts the president while the actor in favor of immigration does not.

These two examples demonstrate how the evaluation process based on different expectations – either anticipatory or normative - constitutes a crucial difference between trust and reputation, which I argue is their main distinction: Reputation builds on anticipatory and trust on normative expectations.

Table 1.3: Differences and similarities between reputation and trust

Overlapping approach	Reputation	Trust
Actors	Multiple audiences with different weights	One majoritarian audience
Actions	Performative, technical, moral, legal-procedural	
Evaluation	Based on past performance and expectations	
Differentiating Approach		
Actors	Multiple audiences with different weights	Individuals constituting the whole citizenry with equal weights
Actions	Performative, technical	Moral, value-based
Evaluations	Anticipatory expectations	Normative expectations

To summarize the main argument: Theoretically there is room for the differentiation between two evaluation processes: One based on anticipatory expectations or past performance, which constitutes reputation, and one based on normative expectations or values, which constitutes trust. So far reputation has been treated as multidimensional concept, which also includes moral aspects. Therefore, one could argue that trust constitutes one part of reputation (moral reputation). However, I argue that the concepts are different enough to separate them and call them two competing mechanisms that create legitimacy. In order to understand this better table 1.3 shows the “overlapping approach”, which has often created blurred lines between trust and reputation, and the here developed “differentiating approach”. The table

incorporates the core distinctions of trust and reputation, which are the type of actors who create the concepts, the type of actions that are perceived and the type of evaluation processes (based on distinct expectations). The “overlapping approach” demonstrates how these concepts conventionally coincide with each other across pieces of work and have not been clearly or cleanly distinguished. The “differentiating approach” shows how the overlapping aspects could be set apart in order to clearly separate the two concepts. In the differentiating approach reputation relies on multiple audiences with different weights, performative actions and evaluation based on anticipatory expectations. Trust on the other hand is associated with one audience of equally weighing individuals, normative aspects of actions and evaluation based on normative expectations.

From these theoretical assumptions, which comprise the main argument of the dissertation, it can be said that theoretically reputation and trust can be distinguished and are two competing mechanisms creating legitimacy. Two research questions emanate from this theoretical argument: One research question asks whether reputation is based on past performance (anticipatory expectation) and the other asks whether trust is based on normative expectations (values):

H₃: Trust in the Commission is associated with normative expectations (values).

H₄: The Commission’s reputation is associated with past performance.

In order to answer these fundamental questions and solidify a theoretical differentiation of trust and reputation empirically, chapter III will test these hypotheses applying mixed methods.

1.5 Conclusion

With the concepts trust and reputation at the end of the theoretical framework, it is important to tie this distinction back to the beginning and within the context of the European Commission as a special case of bureaucracy: Starting with the fact that the EC is a multi-purpose agency, which results in the fact that it works in a much larger number of policy domains compared to single-purpose agencies, it automatically attracts more media coverage. While increased media coverage is an asset for the general public to leverage on and push their interest more, it is less supporting for special interest groups. Furthermore, the tie of special interest groups to performance-based evaluation and the more intuitive way of the general public using value-based evaluation, combined with the assumption that trust is based on values and reputation on performance, results in the exacerbated relative importance of trust for the case of the Commission. In short: An agency like the EC, which can be evaluated by everyone thanks to increased media coverage and awareness, depends more heavily on trust than on reputation.

The here outlined theoretical pathway connects the hypotheses dealing with policy domains, media coverage, lobbying influence, trust, and reputation. While all of the hypotheses are clearly distinct, they connect through the broader theoretical framework, which associates the used variables in a logical sequence.

The developed framework of this chapter is the fundamental theoretical contribution of this dissertation and simultaneously lays the ground for the analysis in the empirical chapter (III). First, it has demonstrated in which ways the European Commission is a special bureaucracy and different from the extensively studied Food and Drug Administration and in which ways it is similar and nonetheless at heart a public administration with features, which make it comparable and yet distinct. Operating in many policy domains, more media coverage and thus more public awareness are key distinctions, while independence, expertise and regulatory policy

output are key similarities between the EC and the FDA. From these differences, the chapter developed a theoretical framework, which incorporates reputation and trust as two distinct and competing evaluation mechanisms that create legitimacy. Moreover, it argued that evaluations can be done by comparing performances or by comparing an agency to normative expectations, which create reputation and trust respectively. While interest groups use performance-based evaluations, ordinary citizens use value-based evaluations. Furthermore, the theory explained why legitimacy is crucial: Legitimacy is needed for compliance, but it is particularly important for the Commission, because the Commission requires compliance by ordinary citizens and not only by interest groups. This line of reasoning indicates that while legitimacy through trust is ultimately important for any agency, it is an exceptionally important concept for the European Commission, because it is observed more frequently by the public and needs ordinary citizens' compliance.

After the emphasis on the theoretical framework, the chapter elaborated on the distinction between reputation and trust and offered an immersion into the concepts looking at actors, actions, and evaluations.

Finally, the chapter connected the theoretical framework to the hypotheses: It introduced H_1 claiming a relationship between the number of policy domains the EC works in and its media coverage and serves as 'setting the scene'. Then it introduced the group-activity hypotheses (H_{2a} , H_{2b}), which argue that exacerbated media coverage plays an important role for policy-influence of interest groups and citizens. The section developed a clear-cut conceptualization, which differentiates between anticipatory and substantive lobbying action: While the former describes a way of trying to influence policy and is often referred to as mobilization, access or activity, the latter means actually influencing policy and is called influence or lobbying success. It further argued that more media coverage has inverse effects on special interest groups' and the general public's influence. It argued that media coverage

pronounces public opinion about an issue, which thus decreases the need for general interest groups (public opinion groups) to lobby for their preferred policy outcome (anticipatory lobbying action). However, simultaneously the created salience increases the weight of public opinion vis-à-vis lobbies and thus makes general interest groups more successful in influencing policy (substantive lobbying action). For special interest groups the opposite holds: When issues are more salient, public opinion is stronger and thus the need to lobby for the preferred policy of special interest groups is higher. However, a stronger public opinion created by issue salience conversely decreases special interest groups' likelihood of success.

After that, the theoretical chapter delved into the evaluation process behind trust and reputation. It theorized that reputation is the process of evaluation where past performance is compared to anticipatory expectations while trust is based on an evaluation process where normative actions of an agency are compared to normative expectations. Moreover, this section made the distinction between trust and reputation clearer and developed a "Differentiating Approach" drawing on three major differences between trust and reputation: actors, actions, and evaluation. Unlike reputation, which is created by multiple audiences with different weights (actors), performative actions and an evaluation based on anticipatory expectations, trust is created by all citizens with equal weights (actors), moral or value-based actions and through an evaluation based on normative expectations. From these theoretical considerations two hypotheses followed, which pronounce the relationship of trust in the Commission with normative expectations and the relationship of the EC's reputation with past performance.

In sum this chapter contributed to literature by dragging the well-established concept of reputation into the novel context of a multi-purpose agency and by adding trust as another important mechanisms that creates legitimacy. It highlighted the importance

of trust in the European Commission and argued that particularly this public agency needs trust-based legitimacy, which is “[...] *a sine qua non for long term survival*” (Brown 1998).

This chapter’s fine-grained conceptual distinctions and theoretical developments will serve as the foundations for chapter (III).

Chapter II

Data and Methods

The objective of this chapter is to explain the rationale for combining a quantitative and a qualitative method in this dissertation, or the reasoning behind using so-called mixed methods (MMs). After introducing the MMs approach, the chapter will elaborate on the data and method used for the quantitative methods. Then it will outline the qualitative part of the mixed methods, again by including a description of the data, how it was collected and analyzed.

2.1 The rationale for using mixed methods

Over the last years, mixed methods, which are defined as the combination of at least one quantitative and one qualitative method (Creswell 2008, Johnson et al. 2007, Mele & Belardinelli 2019), have gained popularity in public administration (for a systematic review see Mele & Belardinelli 2019). Conventionally, three pillars serve as guidance for designing and employing MMs: Selecting, sequencing, and connecting. These guiding pillars have also been the initial approach for the decision to use mixed methods in the form of a sequential design in this dissertation.

Selecting. First, the mixed method has been chosen to add to the quantitative method, which tests hypotheses H_3 and H_4 , but suffers data limitations and second it has been chosen to investigate assumptions of the theoretical framework regarding

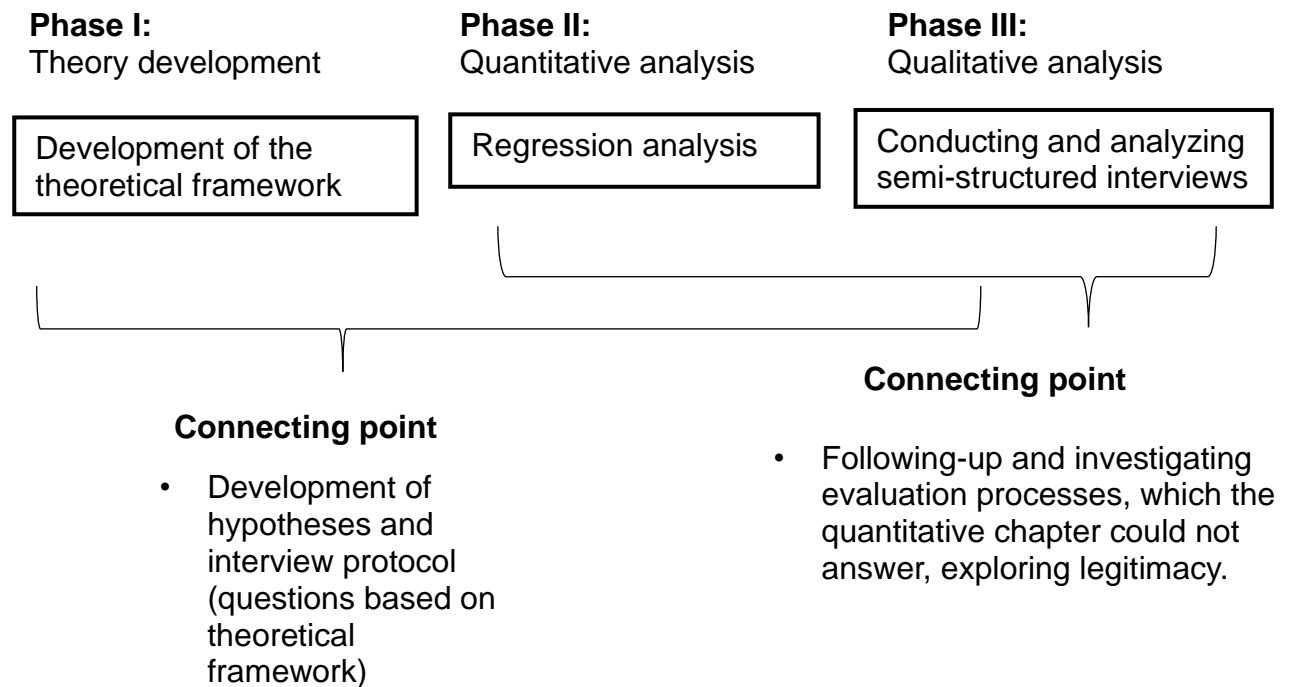
trust and legitimacy. More precisely the fact the limitation of the quantitative method, whereas *trust* and *reputation* but also some explanatory variables for the dependent variables have not been measured in the same year, makes conclusions about the variables' core difference to some extent ambiguous. However, this data-related problem in the quantitative method can be overcome by applying a qualitative method, which investigates precisely the two evaluation processes in more detail. This way the qualitative analysis can add validity to the main argument (Belardinelli & Mele 2020), thus serving as an explanatory and theory-testing tool rather than working for a purely exploratory purpose. The qualitative part of the MMs addresses shortcomings of the quantitative method and simultaneously adds to the developed theory by facilitating a deeper understanding (Saz-Carranza & Ospina 2010). Following Nowell and Albrecht (2019), I argue that the qualitative method applied here is advantageous because it *a) investigates the evaluation processes* used to judge the Commission, which the quantitative method alone could not fully explain and it *b) clarifies two theoretical assumptions*. Consequently, applying MMs in the case of this dissertation sheds more light on the evaluation processes and helps the validity of the theoretical framework.

Sequencing. Second, it has been decided to use a sequential design, which means that the quantitative analysis precedes the qualitative analysis. However, it must be mentioned that data collection for the qualitative analysis has been conducted partly simultaneously with the quantitative analysis: The first session of data collection (expert interviews) was conducted between September 2019 and March 2020 in person in Brussels, while the second phase of follow-up interviews has been conducted remotely (via video calls) in June and July 2021 (after the quantitative analysis). The reason for the partly parallel collection of the qualitative data while analyzing the quantitative data (first session of expert interviews) was pragmatic,

because a particular time frame in order to conduct the interviews in person was the only option (while being located in Brussels). The reason for conducting the second session of data collection after the quantitative analysis, was due to the insufficiency of material from the first session, which only became apparent after reviewing the work and thus had to be complemented by more data (additional 13 interviews). As suggested by Mele and Belardinelli (2018) the quantitative and qualitative methods have been analyzed independently and compared afterwards with two aims in mind: a) to strengthen the theoretical argument and b) to better understand the difference of evaluation processes used by interest groups versus citizens.

Connecting. The literature has shown that connecting quantitative and qualitative methods is one of the most challenging tasks but is also the task that differentiates MMs most from other methods by creating so-called interwovenness (Biesenbender and Héritier 2004; Johnson 2014, Morse 2010). In this case the connecting points of quantitative and qualitative methods often referred to as “integration” (Ivankova et al. 2006, Creswell et al. 2003) lie in two major components demonstrated in figure 2.1: On the one hand, they connect through the theoretical framework, which was used to develop the hypotheses tested in the quantitative method, and the interview protocol used in the qualitative method. On the other hand, the quantitative and the qualitative methods connect through one research question, which the quantitative method alone could not fully answer: How do interest groups and citizens evaluate the Commission? The advantage of two connecting points - opposed to simply the empirical context as one connecting point - is that they create a tighter design (Mele & Belardinelli 2019). Figure 2.1 demonstrates the research phases in chronological order and shows the connecting points between quantitative and qualitative methods (based on the visual models as suggested by Ivankova et al. 2006).

Figure 2.1: Research sequence and connecting points



To summarize, the elaboration on the three guiding pillars “*selecting*”, “*sequencing*” and “*connecting*” offers a solid justification for the application of mixed methods in this dissertation: While the selection of MMs is grounded on the objectives to investigate the evaluation processes, which the quantitative method alone cannot satisfactorily answer due to data limitations, sequencing is based on pragmatic motivations. Thus, the main arguments supporting the choice of a mixed method approach are *a) the addition to quantitative findings* scrutinizing interest groups’ and citizens’ evaluation processes of the European Commission more profoundly and *b) exploring the concept of legitimacy* in the context of the European Commission. That way the qualitative analysis aims to answer two research questions:

a) Evaluation processes:

- *How do interest groups and citizens evaluate the European Commission?*

b) Legitimacy:

- *What builds the Commission's legitimacy and are there problems of legitimacy?*

Table 2.1 summarizes the hypotheses of the dissertation and the method(s) applied for each:

Table 2.1: Hypotheses tested/explored by quantitative and qualitative methods

Hypotheses	Quantitative method (testing)	Qualitative method (exploring)
H_1 The number of policy domains in which the Commission operates influences media coverage over time.	X	
H_{2a} For general interest groups more media coverage is associated with a lower level of anticipatory lobbying action (activity) but a higher level of substantive lobbying action (influence).	X	
H_{2b} For special interest groups more media coverage is associated with a higher level of anticipatory lobbying action (activity) but a lower level of substantive lobbying action (influence).	X	
H_3 Trust in the Commission is associated with normative expectations (values).	X	X
H_4 The Commission's reputation is associated with past performance.	X	X

While H_1 , H_{2a} and H_{2b} are tested by using (only) regression analyses based on quantitative data, H_3 and H_4 will be tested by deploying regression analyses with the addition of a separate, independent qualitative exploration based on the content analysis of interviews. Furthermore, legitimacy and its meaning for the European Commission will be investigated in a purely qualitative fashion.

Following the sequence of the mixed methods design, the following sections will first elaborate on the data and analysis used for the quantitative method and then explain the same for the qualitative method in detail.

2.2 Quantitative methods

Policy domains and media coverage (H₁)

H₁: The number of policy domains in which the Commission operates influences media coverage over time.

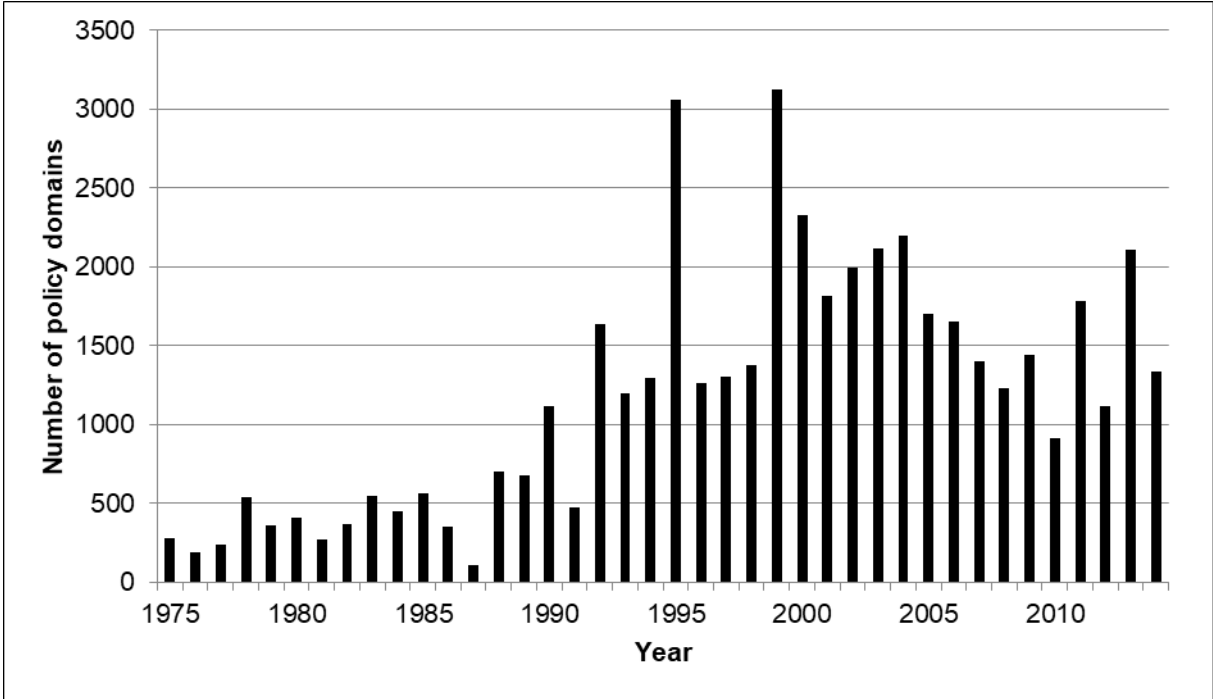
Data

In order to measure the variables policy domain, I use the existing data set of the “*European Union Policy Agendas Project*” by Alexandrova et al. (2014), which is part of the “*Comparative Agendas Project*”¹⁹. This dataset describes (among other issues) the policy topics in which the EU works over the years 1970 to 2014. More precisely the data summarize EU Council conclusions and their topics, which I use as proxies for the policy domains the Commission works in due several reasons. First, the Commission and Council tend to work on general EU policy together, and thus their work should be highly overlapping. Secondly, ordinary citizens could consider Commission and Council to be active in the same policy domains or do not evaluate them separately, as it is often the case in complex democratic systems. Thirdly, the policy domains the Council talks about are derived from the agenda setter, which is the European Commission. Considering these arguments, I used this dataset, consisting of 43.587 coded policy sentences categorized by policy domain over 40 years as proxy for policy domains the Commission works in. More precisely I used the frequency of each policy domain per year, which captures the theoretical

¹⁹ <https://www.comparativeagendas.net>

framework’s idea of ‘doing more’ should create ‘more media coverage. The policy domains are divided in Main CAPICs (Comparative Agendas Issue Codes) and CAPICs, which are major policy domains and sub-domains respectively. An example for a main CAPIC would be “economic policy” and a sub-category thereof would be for example “unemployment”. Each policy domain has been monitored over years. This resulted in a count of the number of policy domains the Commission works in over a 44-year period (figure 2.2):

Figure 2.2: Number of policy domains the Commission works in (1975-2014)



Notes. This shows the number of policy domains in which Commission operated in a given year. The policy domains measure ranges from 110 to 3.129, with a mean of 1.176 and a standard deviation 771,58.

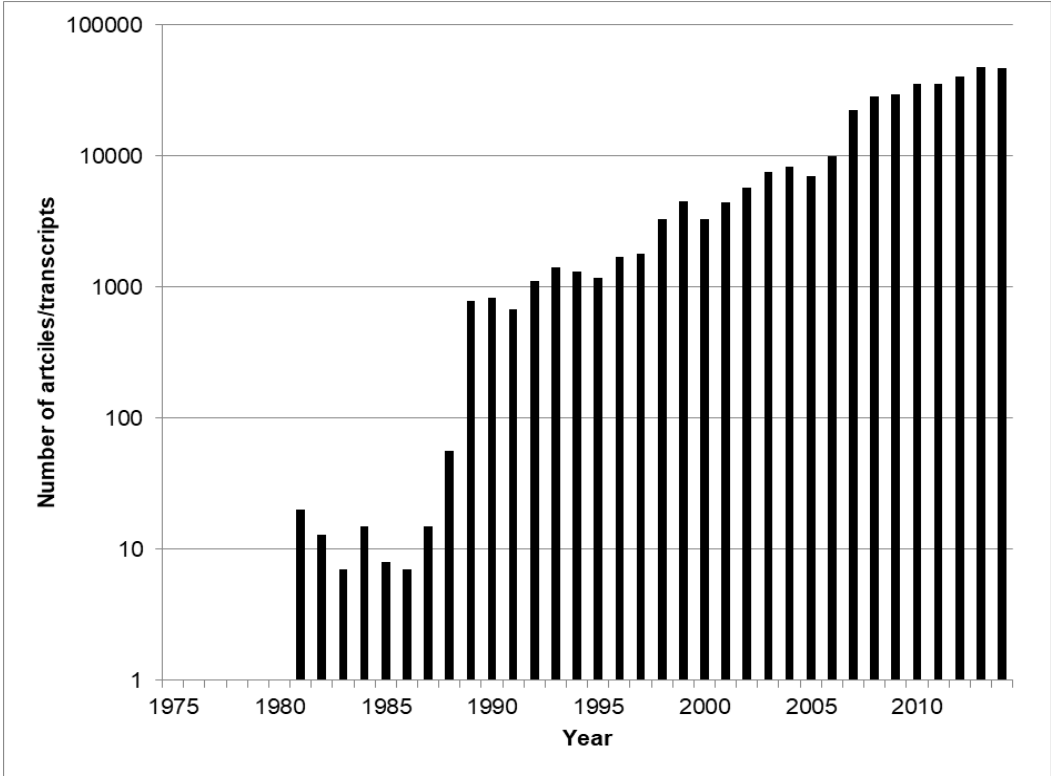
While the existing data set makes the operationalization of the variable *policy domains* straightforward, measuring media coverage of the Commission is slightly more complex. To my knowledge there is no comprehensive dataset, which measures media coverage of the European Commission (rather than of the whole EU) over a sufficient number of years, therefore I constructed my own dataset, which matches the longitudinal data of the independent variable. Following other studies

(Murphy & Devine 2018, Vreese & Boomgarden 2006, Boomgarden et al. 2010), which used a simple frequency measurement (number of articles mentioning a certain institution or agency), I counted the number of articles, which mentioned the European Commission from 1975 until 2014. Moreover, I used the LexisNexis database and searched for all newspapers and transcripts in any of the member states' languages, which mention the European Commission somewhere in the article. This resulted in a code with 24²⁰ different names of the European Commission connected by the Boolean operator "OR", which in LexisNexis describes an inclusive disjunction or alternation (only true if one or more of the operands is true). To make sure "European" or "Commission" alone do not count as "European Commission" I added the logical conjunction "AND", which makes only a count, when the words "European" and "Commission" are mentioned right after each other without any other word(s) in between. Additionally I introduced case-sensitivity for languages where such applies for the name of the Commission (for the exact code used please see appendix I. LexisNexis code). I also confined the search geographically by including only media published in EU member states (another option offered by LexisNexis). The strengths of using the simple frequency measure of articles mentioning the EC are its pragmatism and the suitability for the theoretical framework on which the empirical research builds on. Simple counts of articles in which the EC appears are easy to measure but simultaneously fit into the theoretical background, which argues that more awareness of an agency makes this agency more dependent on the general public's evaluations, no matter whether media coverage is negative or positive. The weakness of this measurement strategy is that it ignores the advantages of tone-sensitive analysis (negative or positive) or intensity measures (how often mentioned within one article), which would be possible advanced options

²⁰ Some names for the EC are overlapping between languages (Croatian and Slovenian for example) and some member states use the same language (German in Germany and Austria for example), which resulted in a lower number of "names" than actual number of member states;

to measure media coverage in a more detailed manner. These options could be explored when richer information about media coverage is required however, for the purpose of the measurement here the simple frequency of articles mentioning the EC captures public awareness in its most straightforward way and is a suitable measurement method for the given case, because simple appearance in the media already creates awareness. This measurement strategy resulted in a measurement of media coverage across all EU28 by a frequency measure from LexisNexis as demonstrated in figure 2.3:

Figure 2.3: All newspapers and transcripts (LexisNexis) mentioning “European Commission” in EU28²¹



Notes. The data is shown on a logarithmic scale. The LexisNexis database only starts measuring articles mentioning the European Commission in 1982. The measurement ranges from 0 to 47.999 articles mentioning the EC per year. The mean is 3.405.5 and the standard deviation 14.181.

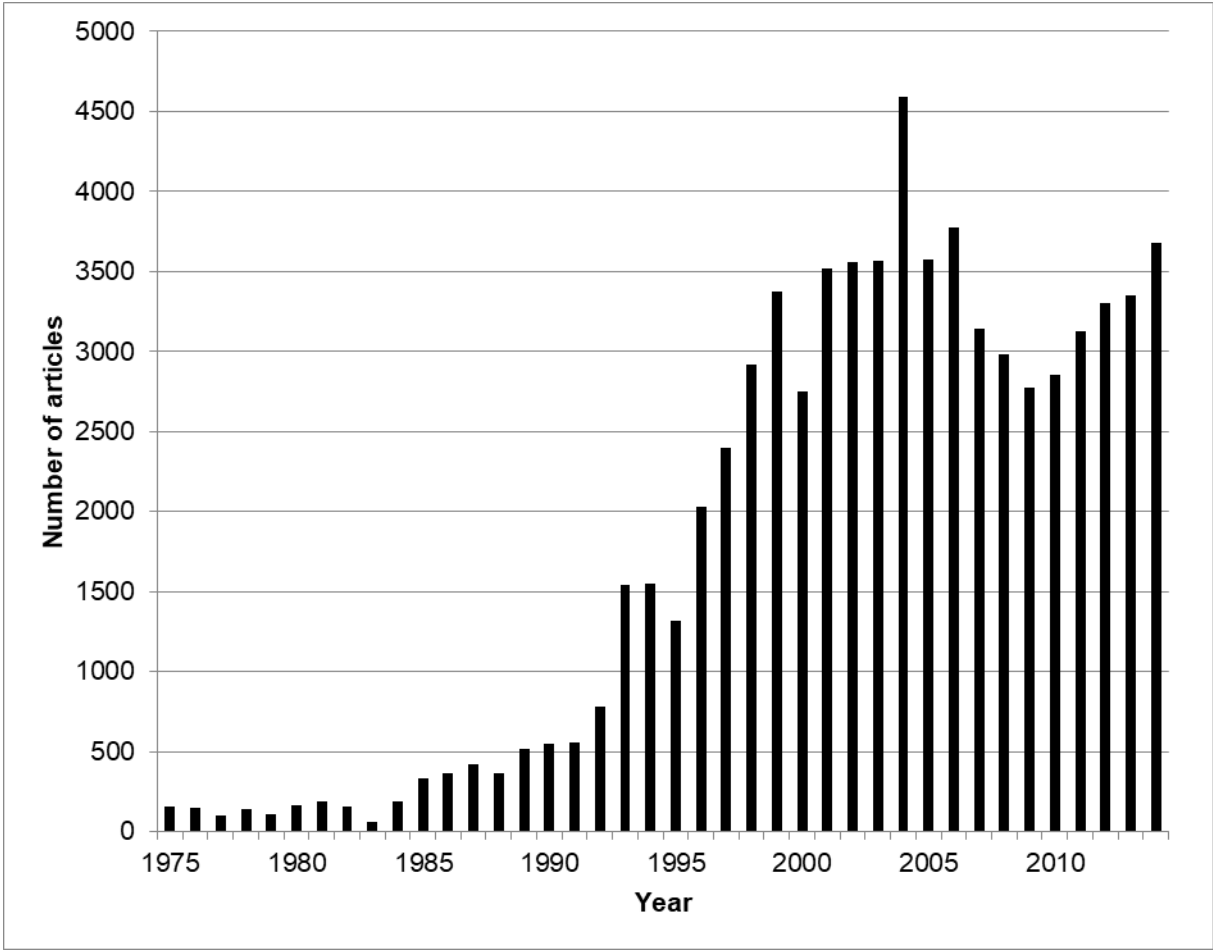
²¹ EU28 refers to the 28 member states of the European Union prior to Brexit including Belgium, Bulgaria, Czech Republic, Denmark, Germany, Estonia, Ireland, Greece, Spain, France, Croatia, Italy, Cyprus, Latvia, Lithuania, Luxembourg, Hungary, Malta, Netherlands, Austria, Poland, Portugal, Romania, Slovenia, Slovakia, Finland, Sweden and the United Kingdom.

Other limitations of the LexisNexis data are that media coverage of all twenty-eight member states starts only in 1981 and the data do not consider the point in time when member states joined the EU. With the aim to address these shortcomings I constructed a second data set based on major newspaper outlets in the four largest member states (Germany, Italy, France, Spain). While Germany, Italy and France have been part of the European Union since its foundation, Spain only joined in 1981, which offers ground for comparison of media coverage and changes thereof before and after accession. More precisely the second dataset was created by using the same frequency measurement-strategy (of articles mentioning the European Commission) throughout the archives of four large newspapers in each of the countries: Frankfurter Allgemeine Zeitung (Germany), La Repubblica (Italy), Les Echos (France) and ABC (Spain)²². It can be inferred that these newspapers are significant examples and capture the general public's awareness of the Commission, because all of them are either the first or the second largest in terms of readership in their respective countries (see appendix *II Readership statistics for each newspaper used to measure media coverage*). At the same time the population of those four countries can also be assumed to be representative, as with approximately 256 million of citizens the countries' population covers about 57% of the overall EU population²³.

²² It was not always possible to use the largest newspaper for each country, and rather the second largest had to be used, as some of them do not offer public archives.

²³ According to Eurostat: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Population_and_population_change_statistics

Figure 2.4: Number of newspaper articles mentioning the EC in the major newspaper outlets of the four largest member states



Note. Spain is the only country of the four, which joined the EU later (1981).

After the collection of the media data, I merged them with the data for policy domains to one comprehensive dataset covering both variables over a total period from 1975 to 2014.

Table 2.2*Summary statistics H1*

	<i>N</i>	Mean	SD	Min.	Max.
Dependent variable					
Media coverage (newspapers)	40	1,773.83	1466.90	62	4,591
Media coverage (LexisNexis)	40	8,810.98	14291.06	0	47,999
Independent variables					
Policy domains	40	1,176.25	771.58	110	3,129
Population (EU28)	40	485,509,067.90	15,993,533.14	456,304,312	512,705,861
Population (4 largest MS)	40	235,990,404.28	9,212,335.94	222,344,646	254,228,310

Method

There are several approaches, which have been proven useful to analyze relationships between variables over time however, given these data, two considerations led to the choice of time series analysis as appropriate family of methods. First, I was interested in the relationship of policy domains and media coverage over an extensive time period because this has not been analyzed in detail in the literature so far and can add to our understanding of the Commission's reputation better than a one-year static analysis would. Especially the changes in the Commission's competencies and power over time make the investigation of the existence of a long-run relationship between policy and media coverage interesting. Henceforth, a longitudinal design was suitable. Second, 49 time-ordered observations of the variable-pair has been shown to be an insufficient number for the often used Auto Regressive Integrated Moving Average Model (ARIMA) (Yanovitzky & Blitz 1999), which would frequently used alternative. Since both variables are time series, a slight deviation from the conventional univariate linear time series

regression by introducing lags to the model has been chosen and considered to be the most appropriate modelling option.

The results for time series regression analysis will follow in chapter III along with all other empirical results, after the remainder of this chapter will first introduce the other quantitative methods used for each hypothesis.

Media coverage and interest groups (H_{2a,2b})

H₂ For general interest groups more media coverage is associated with a lower level of anticipatory lobbying action (activity) but a higher level of substantive lobbying action (influence).

H_{2b} For special interest groups more media coverage is associated with a higher level of anticipatory lobbying action (activity) but a lower level of substantive lobbying action (influence).

Data

Unlike the first hypothesis, which made use of longitudinal data, I test the next hypotheses with a cross-sectional dataset over two years. More precisely I leveraged on the “INTEREURO” project²⁴, a data portal for interest group research in the European Union. Since there is no comprehensive dataset, which combines media coverage and interest group actions, I merged two of the project’s datasets.

The first dataset by Beyers, Dür, Marshall and Wonka (2014) examines media coverage of 538 policy proposals (111 directives and 427 regulations) in six media outlets (Financial Times, Agence Europe, Le Monde, European Voice, Frankfurter Allgemeine, EurActive) between 2008 and 2010. Compared to other datasets, their

²⁴ <http://www.intereuro.eu/public/data>

collection has two advantages. First, it uses media coverage in different languages to not oversample issues that are specific for Anglo-Saxon countries. Second, unlike many other datasets, which often sample based on actors, this dataset uses policy-centered stratified sampling, which has the advantage of a more diversified portfolio of issues that is not salience-sensitive. Especially because my hypotheses require variation in media coverage (salience) to explain interest group action, a sample with a varied spectrum of issue-salience is crucial. Similar to the operationalization of media coverage in the first hypothesis, I chose also for the second hypothesis to measure media coverage by volume, as it is on the one hand theoretically valid and on the other hand practically useful. Theoretically, volume (combined with breadth and prominence) has shown to create knowledge among the public (Barabas and Jerit 2009) and thus influence public opinion.

The second dataset by Dür, Bernhagen and Marshall (2015) investigates interest group action vis-à-vis general interest related to 70 EU legislative proposals, which talk about 115 policy issues also between 2008 and 2010. This dataset relies on interviews with Commission officials and their knowledge of interest groups' policy positions and actions in each official's area of expertise.

The common denominator of both datasets is the unique "Proposal ID" for each policy issue. Based on this unique issue-identifier I merged the two datasets, which resulted in a comprehensive dataset covering media coverage and interest group action with 115 observations of policy proposals, which include 73 directives and 42 regulations.

Operationalization of variables: Interest group action and public opinion

The INTEREURO dataset gives insightful data for researching interest groups, especially because it differentiates between different interest groups (general

interest, business interest etc.) and it captures each interest group's influence on policy through the interviews with officials from the European Commission. Moreover, the data give a level of detail that is high enough to test the theoretical argument developed in chapter I, which requires not only a differentiation between interest groups (IG) and public opinion (PO) but also between anticipatory and substantive lobbying action.

In order to operationalize the dependent variables "anticipatory interest group action", "substantive interest group action", "anticipatory public opinion" and "public opinion influence" I rely on the division of interest groups in general: According to other scholars (Greenwood 2001, Coen 2007, Dür et al. 2015) the lobby-space can be divided into professional (business) organizations and public interest groups. While the former category defends business interest and particular preferences, the latter (general interest groups) fights for more general interests, which are not only confined to their members (Berry 1999) but relevant for society as a whole. Like Dür and Mateo (2014) I argue that general interest groups are a proxy for public opinion, as their agenda should reflect general interest if they want to survive in the long term, considering their limited funding compared to business lobbies. Using this rationality, I coded the different interest groups in three categories: "IG" (interest group), "PO" (public opinion) and "others". Relying on the codebook by Dür et al. I included "Professional associations", "Business Associations" and "Firms" in the variable IG, whereas the variable for PO included the variables "Citizen groups", "Trade union"²⁵ and "Institution"²⁶. For the third variable called "others" I included "National institutions", "European Institutions", "Courts" and "Intergovernmental organizations". After recoding the data into these three categories I created two additional variables

²⁵ Dür et al. refer to trade union as „traditional employee organizations; Associations of employees negotiating work-related terms and conditions“, thus it fits into public opinion rather than (business) interest groups

²⁶ Dür et al.: refer here to public-private entities with public functions. Includes churches, hospitals, foundations, charities.

for each group: “activity” (anticipatory lobbying action) and “influence” (substantive lobbying action).

“Activity” captures the concept of anticipatory lobbying action, which means a group is simply active, or mobilizes in a policy domain. However, as discussed before, that does not necessarily mean it has influence on policy. I operationalized activity (anticipatory lobbying action) by using the number of groups, which are active in each issue.

Measuring “Influence” (substantive action) is a little more complicated. Drawing on the common and widely used assumption that actors have single-peaked preferences, I use the same technique as Dür et al. (2015). In their work *“Interest Group Success in the European Union: When (and Why) Does Business Lose?”* they introduce a way to measure interest groups’ policy positions on a continuum from 0 (most right) to 100 (most left) (Thomson 2006) for each issue. This gives a single peaked preference point on a policy continuum for each actor across 115 issues. Additional to that, they also identify the final outcome of the proposal (“outcome”), which is the final policy decision and the “reversion point”, which is the outcome in case no consensus on the proposal would be found. This collection of data via interviews resulted in a new measurement for policy preferences of non-state actors. The actor preferences were then compared to outcomes and reversion points and thus determine “success” (influence). To illustrate the calculation of substantive action (influence, success) after Dür et al. (2015)²⁷:

$$sa_{ij} = |(x_{ij}-RP_j)| - |(x_{ij}-O_j)|$$

From the equation above it should be explained that *sa* denotes substantive action also referred to as “influence” or “lobbying success”, and thus indicates the degree to which policy is actually influenced. Then *i* and *j* stand for each interest group and

²⁷ It should be noted that this formula is taken directly from Dür et al. (2015) and not changed in any way, besides the name for the expressed variable (“*sa*”)

issue, respectively. Furthermore, *RP* refers to the reversion point and *O* to the observed policy outcome.

To describe substantive action and thus this calculation more intuitively: *sa* is the degree to which an actor manages to pull the outcome closer to his/her ideal policy outcome relative to his/her reversion point (Dür et al. 2015, p.963). Thus, the closer an actor's policy preference is to the outcome, but simultaneously the further away it is from the reversion point, the more influential is this actor. Shortly: The larger *sa* is, the more influential and successful is the actor in his/her lobbying action.

The dataset (Dür et al. 2015), combined with the above explained operationalization of the variables give then ground to test the effect of media coverage on anticipatory action and substantive action for both, interest groups and public opinion.

Table 2.3

Summary statistics H2

	<i>N</i>	Mean	SD	Min.	Max.
Dependent variables					
Anticipatory lobbying action	115	5.98	4.76	0	19
Substantive lobbying action	115	24.97	30.97	0	140
Public opinion activity	115	2.13	2.16	0	12
Public opinion success	115	23.24	33.76	0	110
Independent variables					
Total media coverage	115	16.01	17.01	0	108
Other activity	115	1.07	1.87	0	10
Public support	115	2.47	1.22	1	5
Commission support	115	61.4	36.28	-55	100
EP majority	115	39.04	38.37	-33	120
Council majority	115	16.50	39.79	-55	100

Method

Unlike the hypothesis investigating the number of policy domains' effect on media coverage over a longer time, the analysis here relies on a shorter time frame of only two years, to which the data refers. Henceforth, a cross-sectional analysis using a simple linear regression model is suitable and allows exploiting the effect of media coverage across multiple issues belonging to different policy domains.

As for hypothesis 1, the empirical analysis will follow also for these hypotheses in chapter III.

Trust and Reputation (H₃, H₄)

H₃ Trust in the Commission is associated with normative expectations (values).

H₄ The Commission's reputation is associated with past performance.

Data

Trust and reputation are not only conceptually close concepts, as shown in chapter I, but also empirically difficult to distinguish. More so, when it comes to trust and reputation of the European commission and not the European Union as a whole. The aim to measure explicitly perceptions in form of trust and reputation of the European Commission and not simply of the European Union as a whole makes the "Mannheim Eurobarometer Trendfile"²⁸ - a combined dataset of all Eurobarometers (EB) dating from 1970 to 2002 - a suitable database, because it includes questions, which capture the independent variables quite straightforwardly. More precisely, I used the *Data Set Edition v2.0.1*, of which I used the subsections when trust and reputation

²⁸ <https://www.gesis.org/eurobarometer-data-service/search-data-access/eb-trends-trend-files/mannheim-eb-trend-file>

was measured, which includes the years 1999, 2000, 2001, 2002 (spring), 2002 (fall) (for trust) and 1987, 1988, 1990, 1991, 1993 for reputation.

The main advantage of the “trendfile” is that it repeats the same questions across a number of years. The main disadvantage, however, is the fact that not all survey questions are asked every year, which creates a fluctuation in the number of variables per year (see appendix VI. *Variables and years of measurement in the Eurobarometer* for an overview of the Eurobarometer and the measure of trust and reputation). Due to the fact that independent and explanatory variables cannot be compared across years, I chose only variables present in the same years. This resulted in two different datasets, one for each hypothesis. The details of each of these datasets will be discussed for H₃ and H₄ separately.

Trust and normative expectations (values)

The Eurobarometer Trendfile measures trust in the European Commission (“trustec”) very clearly by asking the following survey question: *“Have you heard of the European Commission? (...) Please tell me if you tend to trust it or not to trust it?”*. The dichotomous possibility to answer with either *“tend to trust”* or *“tend not to trust”* creates the binary response variable *trustec*, which captures trust in the EC. This straightforwardness is not so present for the independent variables capturing values. The literature often complains about the lack of investigation in values (Van der Meer 2019), because of the difficulty to capture them empirically. This problem prevails also in this study. Limited by the given five years (1999-2002, twice in 2002), in which trust in the EC is used as survey question, I identify three variables, which best capture fundamental values as main component of the theoretical framework. The first value called *“membrshp”* is based on the general attitude about being part of the European Union and asks whether membership of the EU is “a rather good” or a “rather bad thing”. The second value called *“benefit”* asks whether one’s country has

benefitted or not benefitted from the EU and the third value called “*regret*” asks about the reaction of in the case of a dissolution of the EU with answers ranging from “being very sorry” to “feeling relieved”. These three survey questions are used as an approximation for general attitudes and fundamental values of individuals. Even though they do not capture the term “value” in its full theoretical richness, I argue these three questions are valid proxies for values in this theoretical context, because they capture deep core beliefs, which are rather constant over time and not subject to change, just like fundamental values used in the theoretical framework. This is in line with Easton (1975,449), who emphasizes deeper more fundamental attitudes towards a regime and general long-term evaluations, which are both tightly linked to values, and thus the most important factors determining political trust.

Additional to these three variables I also included three other basic demographic and socio-political variables such as *sex*, level of *education*, *age*, and *political orientation* on the left-right scale (as shown in table 2.4). Combining these variables and excluding incomplete observations resulted in the final dataset with 15.998 observations of eight variables (see also appendix VII. *Correlation matrix: Trust*).

Table 2.4*Summary statistics H3*

Trust and normative expectations (values)

	Mean	SD	Min.	Max.
Dependent variable				
Trust	1.01	.4769	1	2
Independent Variables				
<i>Values</i>				
EU membership	1.57	.7117	1	3
Benefit	1.34	.4729	1	2
Regret	1.77	.6782	1	3
<i>Socio-political attributes</i>				
Education	5.15	3.1669	1	10
Age	44.5	18.066	15	99
Political orientation	5.2	2.041	1	10

Notes. N = 15 998 complete observations over five years: 1999, 2000, 2001, 2002 (spring), 2002 (fall).

Reputation and anticipatory expectations (performance)

With the aim to capture “reputation” I follow the idea by Lee & Van Ryzin (2018) and use an overall measure for reputation rather than an attribute specific measure (Dowling and Gardberg 2012). This means that reputation is measured by general beliefs about an agency rather than examining each of the agency’s distinct features and reputations for different attributes. A satisfactory way to assess an overall measure of the European Commission’s reputation gives the following EB question: “*Has what you read or heard given you a generally favorable or unfavorable impression of the European Commission?*” Unlike *trustec*, this variable is ordinal and has three categories spanning from “*generally favorable*” over “*neither*” to “*generally unfavorable*”. These three categories have been recoded into an ordinal, variable ranging from “good” to “neither” to “bad”, indicating the overall reputation of the EC.

Even though this variable is not explicitly mentioning the term reputation, it captures Carpenter's idea of a set of beliefs dependent on the agency's capacities, intentions, history, and missions quite well, because it asks about a general perception of the Commission.

For the operationalization of the explanatory variable past *performance* I used respondents' perception of economic performance over the last year. More precisely the question asks how the economic situation has changed over the last twelve months with a five-rank classification of answer options ranging from "got a lot better" to "got a lot worse". This question is in line with the theoretical argument that reputation is based on past performance and thus anticipatory evaluations, which are made by comparing what will happen to what actually happened. A retrospective evaluation of economic performance, which is one key competence of the Commission governing the single market, captures performance-based measures, which are at heart of the term reputation, best.

As before, the final dataset is limited by the number of years, in which both of the questions have been asked, which creates a reduced dataset of 18.380 observations of 10 variables cross a timespan of six years. Again I also include other basic demographic and socio-political variables such as *sex*, *level of education*, *age* and *political orientation on the left-right scale* (see table 2.5 and for the correlation matrix VIII. Correlation matrix: Reputation).

Table 2.5*Summary statistics H4*

Reputation and performance

	Mean	SD	Min.	Max.
Dependent variable				
Reputation	1.72	.8171	1	3
Independent Variables				
<i>Performance measure</i>				
Change of economic situation	3.17	1.0973	1	5
<i>Values</i>				
Unification	1.75	.8393	1	4
European government	1.31	.4632	1	2
EU membership	1.31	.6446	1	3
Benefit	1.23	.4230	1	2
Regret	1.44	.6624	1	3
<i>Socio-political attributes</i>				
Age	43	16.8211	15	96
Education	5.19	3.1855	1	10
Political orientation	5.38	2.1051	1	10

Notes. N = 18 318 complete observations over the years 1987, 1988, 1990, 1991, 1993. The large amount of incomplete observations is mainly due to a) the reputation measure (36 014 incomplete observations and b) the European government measure (20 118 incomplete observations).

Methods

A common way to predict dichotomous outcomes with one or more independent variables is the logistic regression model. Types of logistic regressions can be collectively defined as class of generalized linear models, whereas the outcome variable is transformed to the natural log of the odds (O'Connell 2006). While trust is a binary response variable and can thus be modelled with the classical logistic regression, the better modelling strategy for reputation, which is an ordered categorical response variable, is an ordinal logistic regression.

Trust

To demonstrate how fundamental values and attitudes towards the European Commission influence trust in it, I run three nested logistic regression models. Additional to the logistic regression, I run another model, which also belongs to the family of generalized linear models: The Poisson regression. When modelling nonnegative variables the Poisson regression has several advantages: It uses more relaxed assumptions of the estimators' distribution, it tends to over- or underestimate to a lesser extent and has lower total error (Cameron & Trivedi 1999). More precisely I use the fixed effects Poisson estimator (FEP), which is a distribution-free estimator for panel data models, only requires a conditional mean assumption and it proven to be consistent very generally (Wooldridge 1998).

Reputation

Modeling *reputation* is slightly more complex, because the variable is divided into three ordered categories ranging from favorable (coded as 1) over neither (coded as 2) to unfavorable (coded as 3). Henceforth, I choose the adjacent categories model (AC), which is a special form of the generalized logit model for multinomial outcomes (Hosmer& Lemeshow 2000). The difference of this method compared to multinomial models is that it takes advantage of the response variable's ordinal nature via successive comparisons of one category and its adjacent category (Bilder & Loughin 2013, p.186). This is especially interesting for reputation, because it assesses the probability for a changing from good to worse reputation when perceived performance drops, Henceforth, this modelling strategy can explain when reputation is most likely to decline. Moreover, the AC model estimates explanatory variables' effects in pairs of categories simultaneously, which forms a

dichotomization of the data (Agresti 2019). Formally the model can be written as follows (O'Connell 2006, p.76):

$$Y'_j = \ln(\pi_{i,j+1} / \pi_{i,j}) = \alpha_j + \beta X_i ,$$

where $\pi_{i,j}$ is the probability of person i 's response being in category j , which is compared to the probability of the response being in the next category ($j+1$). In the given context here, this model assesses the effect of a change in perceived *performance* on the probability to change from giving the Commission a *good* reputation to a *medium* reputation (called "neither") and at the same time the probability to change from a *medium* reputation to a *bad* reputation. Considering the three categories of reputation (*good, neither, bad*), this model then predicts odds for the success of category 2 (neither) versus the odds of the adjacent category 1 (good) and simultaneously it predicts also the odds for category 3 (bad reputation) versus the odds of the adjacent category 2 (neither). The advantage of using the AC model in this case is that it shows the trajectory from "good reputation" to "bad reputation" because it determines the independent variable's effect on the probability of forming worse beliefs about the Commission.

Regression results will be reported and interpreted in chapter III.

2.3 Qualitative method

As explained before, the MMs deployed here use a qualitative method following the quantitative method with the aim to answer the research questions:

1. *How do interest groups and citizens evaluate the European Commission?*
2. *What builds the Commission's legitimacy and are there problems of legitimacy?*

More precisely the qualitative method investigates the evaluation process (1) with which the Commission is judged, whereas the theoretical framework argues that the evaluation process differs for citizens and interest groups. Furthermore, it explores the concept legitimacy, which plays a crucial role in the theoretical framework. Figure 2.5 showcases to which parts of the theoretical framework the qualitative analysis relates. First, the qualitative analysis will be looking at evaluation mechanisms, and is thus complementary to the quantitative analysis, which could not disentangle these mechanisms satisfactorily. Second, the qualitative approach explores legitimacy, which plays a crucial role in the theoretical framework but has not been touched by the quantitative analysis at all.

Choosing elite interviews

The methodological discussion surrounding elite interviews, also often referred to as “expert interviews” in the German-speaking world (Littig 2009), has its origin approximately three decades ago with the seminal contribution of Meuser and Nagel (1991) who opened the debate of the method's shortcoming: Despite the fact that elite interviews have been used frequently and over decades, the literature has never developed a methodological standardization. Even though elite interviews have been applied earlier, it is only in the 1990's that a systematic debate around the topic emerged, which gave the impetus to examine the method more rigorously and

consolidate knowledge about it in a more standardized way (Bogner et al. 2009, chapter 1). One common problem of elite interviews is that the definition of the elite is ambiguous (Harvey 2011, Smith 2006) and lacks a generalizable definition (Deeke1995, Bogner & Menz 2009), but is most famously defined as “*a group of individuals who hold a privileged position in society and, as such, as far as a political scientist is concerned, are likely to have had more influence on political outcomes than general members of the public*” (Richards 1996, p.199). For the sake of this work the interviewees represent a group that could be considered an overlap between elites and experts (as Littig argues is possible). Interestingly, other scholars have not precisely highlighted this difference before but overlap in definitions of elite and experts by two main characteristics: Influential and knowledgeable.

Dexter (2012) for example defines the elite by “the influential, the prominent, and the well informed”, while Harvey (2011) calls them “those who hold important social networks, social capital and strategic positions within social structures because they are better able to exert influence”. Welch et al. (2002) describes the elite as “an informant who has functional responsibility in an area which enjoys high status in accordance with corporate values, has considerable experience and frequently also long tenure with the organization, possesses a broad network of personal relationships, and has considerable international exposure”. Flick (2019, chapter 16) defines them as “people in institutions who have specific insights and knowledge because of their professional position and expertise”. Taking these characteristics into consideration, one must decide on a case-by-case basis whether the interviewee fits better into the category of the expert (knowledge-focused) or of the elite (influence-focused). However, in the case of this dissertation all interviewees occupy a hybrid position between elite and expert and given the general proximity of these terms, they will be used interchangeably.

In the light of the numerous forms of expert interviews that exist in qualitative research methods, it is important to think thoroughly about two main determinants for the right choice of method: The goals of the research and the audience interviewed (Flick 2019, chapter 15).

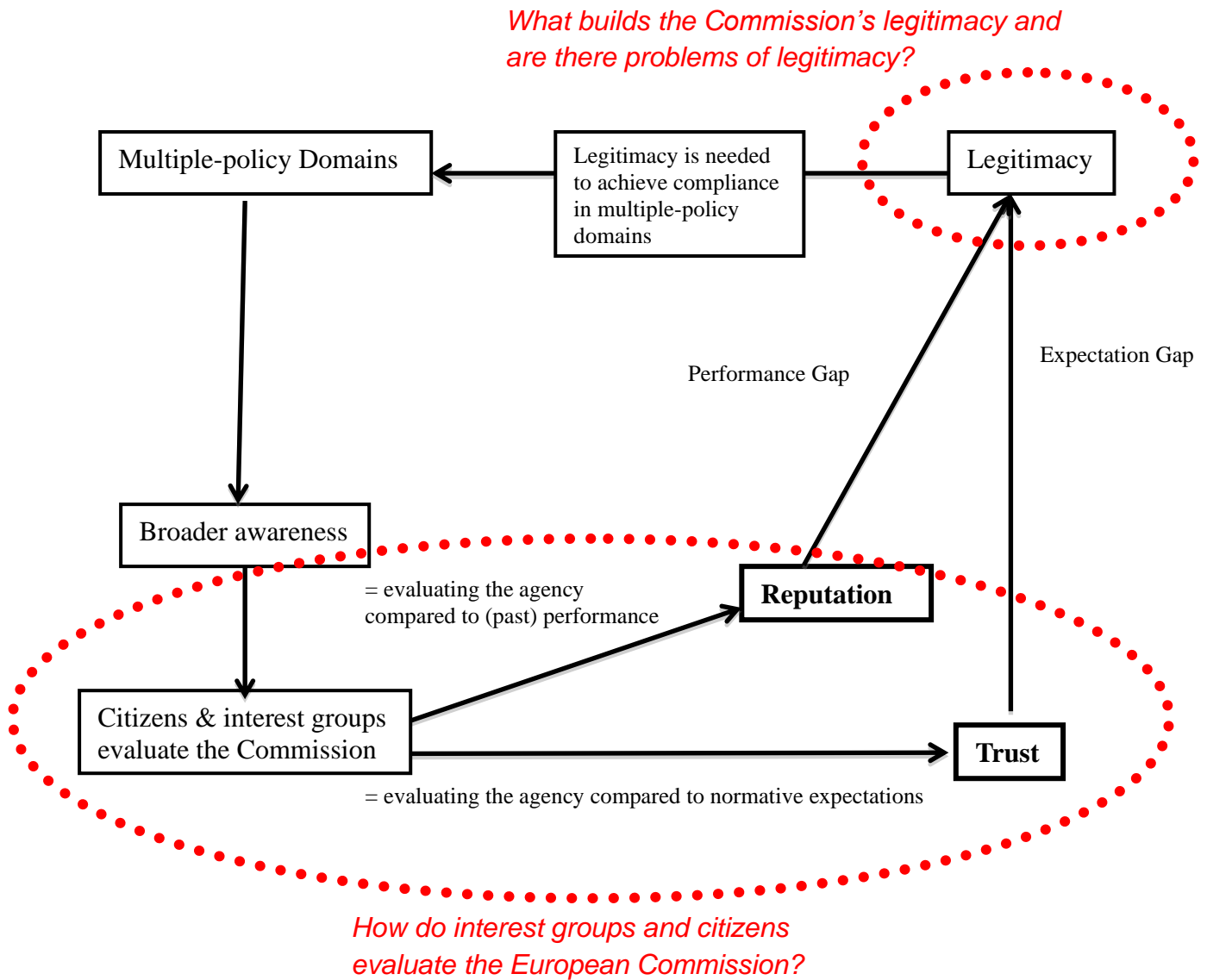
To give an overview of existing methods depending on the research goal, Bogner and Menz (2009) offer a typology of the expert interview that differentiates between three main categories: The exploratory, the theory generating, and the systematizing expert interview. The systematizing expert interview intends to obtain systematic and complete information about the issue under investigation and is thus seen as *pars pro toto* (Gläser & Laudel 2009). It often plays a more complementary role and thus is often used in addition to other methods to create triangulation (Flick 2019, chapter 16). I choose the systematic elite interview rather than the exploratory or theory-generating type because the aim of this chapter is not to explore a new field or generate a theory but rather to add as complementary tool, which strengthens the theoretical argument and supplements where the quantitative method - due to data limitations - could not sufficiently answer the research question. Further characteristics that speak in favor of the systematizing elite interview include the fact that the object under investigation is not the interviewee but the research topic itself and that it offers the freedom to choose between more open-end or more structured survey-like designs.

Considering the interviewees, it is helpful that systematizing elite interviews do not lay a standardized design forward, which would force the researcher to use either only open-end or only closed interviews (Bogner & Menz 2009, Deeke 1995, Vogel 1995). The approach in this work follows a similar design like previous studies mentioned by Christmann (2009), whereas it uses an interview guideline with open-end questions and enough space to maneuver thematically during the interview. This means that all questions are pre-determined but can spontaneously change in their

order (if felt as appropriate during the interview) and slightly differ also for each participant (depending on what the participant is willing to elaborate on). In the literature, this design is often also referred to as semi-standardized interview and characterized further by three essential elements (Scheele & Groeben in Flick CH16): open questions, theory- or hypothesis-driven questions and confrontational follow-up questions. Referring to Aberbach and Rockman (2002), there are three reasons to choose open-end questions over a fully structured interview: First, an open-end design is more suitable for complex and abstract issues with the aim to obtain explanations about these issues through the interviewee. In the case of my work, evaluation processes and the concepts trust and legitimacy are highly abstract and complex, which profit from an open-end design where the interviewee can fully express and explain in depth the issue under study. Second, this design “maximizes response validity” (p.674) as the respondent is not forced into certain pre-prepared answers, which are potentially biased by the interviewer. Given my theoretical framework, it was important to not bias the interviewee towards my theoretical assumptions but leave full flexibility to grasp the true meaning behind the concepts from the point of the interviewee, who is frequently in touch with citizens and interest groups and also often involved in discussions regarding trust and legitimacy of the EC. And third, open-end questions suit the receptivity of the respondent better because elites and experts prefer to explain their views in more detail rather than choosing one out of several options to answer (like a strictly structured survey would do). Given the relatively high ranks and positions of the interviewees within the Commission, they most likely preferred to answer ‘their way’ than conforming to pre-written answers. It follows from these considerations about research objective and interviewees, that the semi-structured elite interview is the best suitable method for collecting data in the case of this qualitative research.

Figure 2.5:

Deriving research questions for the qualitative analysis from the theoretical framework:



Research questions

The qualitative component of my research project has two central objectives: On the one hand it should shed light on the evaluation processes used by interest groups versus citizens, which the quantitative chapter has not fully answered. And on the other hand, it should investigate the meaning of legitimacy for the Commission. Along these two objectives, the analysis is split in two blocks:

Block A, which focusses on the evaluation processes:

- *How do interest groups and citizens evaluate the European Commission?*

And block B, explores legitimacy by answering the research question:

- *What are the building blocks of the Commission’s legitimacy and are there problems of legitimacy?*

Table 2.6 shows more precisely which interview questions aid in answering the research questions regarding evaluation processes and legitimacy.

Table 2.6: Blocks of the analysis – Theoretical framework and evaluation process

Block	Interview question
<p>Block A: Evaluation processes</p>	Do you think the daily work performance of the Commission matters to interest groups?
	Comparing citizens and organized interest: Who of these groups would you say is more influential?
	Now about organized interest: On what premises or criteria do they evaluate the Commission?
<p>Block B: Legitimacy</p>	What is, in your opinion, the Commission’s legitimacy?
	What can the Commission do to increase legitimacy in society in the future?

The first thematic block (A) addresses the question whether citizens' and interest groups' evaluation of the Commission differ. It plays a complementary role to the quantitative method, which tries to show that they do differ (by being based on trust for citizens and reputation for interest groups). However, the quantitative method suffers data limitations as trust and reputation have not been measured in the same year and are thus not directly compared. Without assuming trust and reputation being the drivers of citizens' and interest groups' evaluations, the qualitative method tests this theoretical argument independently via the questions in block A.

The second thematic block (B) scrutinizes the building blocks and problems of legitimacy in the case of the European Commission.

Data collection

Data collection for the expert interviews was conducted in two phases: One initial phase during September 2019 and March 2020 using in-person interviewing in Brussels and one follow-up phase in June and July 2021 using video calls (as reported in table 2.7). The interview script used in the first phase was tailored to the time-constraint of the interviewees, which was around 30 minutes and included six questions (without spontaneous follow-up questions). The second phase of interviews (follow-up phase) revisited the initial script and focused on three of the six questions, which explored the evaluation process the Commission is subject to and only lasted 15 minutes per interview (for the scripts see in the appendix *Full interview script* and *Reduced interview script*).

Conventionally, the literature refers to two major limitations, which are typical for elite interviews: Getting access and time pressure (Aberbach & Rockman 2002, Bogner & Menz 2009, Flick 2019 chapter 16). In my research, getting access was facilitated by

spending six months (September 2019 until end of February 2020) in Brussels working as a “bluebook trainee” in the European Research Council Executive Agency²⁹, i.e. an agency under the control of DG Research that is part of the European Commission, but acts as an independent agency that gives funding to researchers. This traineeship did not only give me a more thorough understanding of the Commission’s general way of working, but also allowed me to have access to all local intranets of each Directorate General and the internal address book. The local intranets were useful in my sampling strategy because they introduced the possibility to randomly sample civil servants from each DG, and thus, diversify the sample more than, for example, snowballing, typically used for elite interviews. Given these possibilities of access I decided for a stratified sampling method (Jones 2014), whereas the researcher divides the total sample (all civil servants of the Commission) into strata (each DG) and then randomly samples within these strata. Henceforth, I accessed each DG’s intranet and randomly selected 1-2 civil servants. Afterwards, I used the address book, which holds contacts of every civil servant in the Commission and is also accessible to trainees, to get each randomly sampled civil servants’ email address and contacted them. In the second (follow-up) phase, the sampling strategy was similar, but instead of randomly selecting from intranets, which were not available anymore, I randomly selected civil servants from each DG’s organigram. Of all 54 DGs and executive agencies, I excluded three departments due to the fact that they were either purely internal services (Administration and Payment of individual entitlements, Library and e-resources center) or that their intranet or organigram was not accessible (Eurostat – European Statistics).

As far as time pressure is concerned, I had to hold interviews with an approximate timespan of 30 minutes (with two main outliers: one interview of 11 minutes and one of 50 minutes). The reason for that was mainly pragmatic, as this time period

²⁹ <https://erc.europa.eu/about-erc/erc-executive-agency-ercea>

coincided with the average timeslot offered by most interviewees, which included Director Generals and head of units.

In the first phase I conducted 14 interviews, whereby almost all interviews have been conducted in person (13) with only one exception, which was done via telephone (1) due to geographical constraints, as the interviewee was not in Brussels during the available time slot. In the second phase I conducted 13 follow-up interviews, which were all done via video calls, for a total of 27 interviews. Furthermore, almost all conversations have been audio-recorded (23) to minimize information loss; only three interviewees did not agree on audiotaping but allowed taking extensive notes during the interview and one was a written answer by the respondent via email (see table 2.7 for a summary of the interviews).

Afterwards, I chose the best fitting transcription system, defined as a set of rules that determines how spoken language is transformed into written text (Edwards 2002, Mayring 2014, Howitt 2016). Referring to a typology introduced by Mayring (2014), transcription systems can be categorized by the level of detail that the text takes from the recorded interview and are ranging from very economic and timesaving systems such as “selective protocols” to extensive systems like “pure verbatim protocols”. The total of 27 interviews gave me the opportunity to utilize a pure verbatim protocol, defined as a transcription done “word for word including every utterance from the audio file” (Mayring 2014. p.45). Employing that strategy was in this case within the given time constraint and had the advantage of including all information and every detail of the interviews. In total this resulted in roughly 454 minutes of interviews and a transcribed material consisting of 37.000 words for the qualitative content analysis.

Table 2.7

Elite Interviews

Interview	DG	DG (full name)	Function/position	Date of interview	Duration of interview (min)	Number of words in transcript
Interviews (September 2019-March 2020)						
1	DEVCO	Directorate General for development*	Head of Unit	11/02/2020	28	2274
2	RTD	Directorate General for Research, Innovation and Science	Deputy Director General	13/02/2020	18	822
3	MARE	Directorate General for Maritime Affairs and Fisheries	Deputy head of unit	14/02/2020	16	1993
4	MOVE	Directorate General for Transport	Head of Unit	18/02/2020	20	1689
5	AGRI	Directorate General for Agriculture and Rural Development	Head of Unit	18/02/2020	24	1583
6	TAXUD	Directorate General for Taxation and Customs Union, Audit and Anti-Fraud	Head of Unit	19/02/2020	19	1971
7	COMM	Directorate General for Communications	Head of Unit	19/02/2020	14	1333
8	DIGIT	Directorate General for Digital Agenda**	Deputy Director General	20/02/2020	18	1614
9	EAC	Directorate General for Education and Culture	Head of Unit	20/02/2020	36	1144
10	REA	Research Executive Agency	Head of Unit	21/02/2020	31	1929
11	TRADE	Directorate General for Trade	Head of Unit	26/02/2020	28	2283
12	COMM	Directorate General for Communications	Head of Unit	27/02/2020	17	1976
13	ERCEA	European Research Council Executive Agency	Head of Unit	28/02/2020	17	1307
14	Representative Office	Representative Office of the EC in member state	Head of Office	05/03/2020	29	1900
Follow-up interviews (June-July 2021)						
15	ENV	Directorate General for Environment	Head of Unit	16/06/2021	11	754
16	INTPA	Directorate General for International	Head of Unit	16/06/2021	12	958

		partnerships					
17	HOME	Directorate General for Migration and home affairs	Head of Unit	17/06/2021	7	351	
18	HOME	Directorate General for Migration and home affairs	Head of Unit	18/06/2021	14	1029	
19	REFORM	Directorate General for Structural Reform Support	Head of Unit	24/06/2021	10	659	
20	TAXUD	Directorate General for Taxation	Head of Unit	24/06/2021	11	952	
21	ENV	Directorate General for Environment	Deputy Head of Unit	25/06/2021	9	618	
22	COMP	Directorate General for Competition	Director	25/06/2021	14	994	
23	SG	Secretariat-General	Head of Unit	29/06/2021	13	1498	
24	SG	Secretariat-General	Director	30/06/2021	15	1472	
25	SG	Secretariat-General	Head of Unit	30/06/2021	11	1010	
26	SG	Secretariat-General	Head of Unit	01/07/2021	12	871	
27	SG	Secretariat-General	Head of Unit	23/07/2021	written answer	1528	
Average					17.46	1404.31	
Min					7	351	
Max					36	2283	
Total					454	36512	

Notes. The table uses the current DG names during the interview period (September 2019-March 2020); *as of 2021 called Directorate-General for International Partnerships (INTPA); **as of 2021 called CNECT;

Qualitative content analysis (abductive approach)

I chose qualitative content analysis to analyze the interview data and maintain the transcript's richness. Qualitative content analysis can be defined by two essential characteristics inherent to the method: Assigning categories to text with regard to semantics in text passages and analyzing these categories or emerging patterns thereafter (Bauer 2000, Braun & Clarke 2006, Flick 2019 chapter 26, Schreier 2013, Mayring 2014). This two-step nature in qualitative content analysis seems to serve as a solution between two competing paradigms in the theory of science analyzed by Guba and Lincoln (2005): Positivism and Constructivism. While positivism claims objectivity due to the fact that text can be measured and quantified and is thus

objective (absolute), constructivism argues that results of text analysis are subjective and always relative to the situation and the reader (Mayring 2014, p.7). Qualitative content analysis seems to fit into both of these opposing epistemologies depending on the stage of the research process (Creswell et al. 2018, Teddlie 2020): First it occupies a constructivist position by using a qualitative step that takes the circumstances of each interviewee and reader into account, and then it takes a positivist position by either theorizing about observations collectively and trying to identify overarching patterns or analyzing them quantitatively.

For a long time, the literature has not managed to develop a truly standardized procedure of qualitative content analysis, but in the last decade some authors such as Schreier (2013), Flick (2019) and Mayring (2014) have offered first guides for researchers of how to conduct good qualitative content analysis and even more recently Nowell and Albrecht (2018) have complemented this advancement in the field by offering guiding criteria for quality and rigor in this method. The instructions of Schreier, Flick and Mayring divide qualitative content analysis into seven steps, which include (among others) developing a research question, selecting material, deciding on the research design, trial coding, processing the study and discussing the results with respect to common quality criteria.

Considering that research questions and material have been introduced in former paragraphs, I want to elaborate more extensively on the choice of the research design and the mode of inference (theorizing) used in this section. First, other than purely quantitative methods, which mainly use correlational and causal designs, qualitative content analysis offers five distinct designs: explorative, descriptive, correlational, causal, and mixed designs (Mayring 2014, p.11). The chosen design for this study is descriptive and explorative, thus no causality or correlation can be derived from the analysis. In combination with existing theory and results from the quantitative chapter, this analysis tries to explore evaluation processes and

legitimacy in the case of the Commission further, which have been used in the theoretical framework but not clearly investigated using quantitative analyses. Second, another fundamental choice regarding the research design is the suitable mode of theorizing given the objectives of the study. Theorizing, often described as making inferences, is the abstraction of collected content done by the researcher, which should create understanding and facilitate a clear interpretation for others (Cornelissen & Durand 2014, Welch et al. 2011). Three common techniques of theorizing include deduction, induction, and abduction (Berelson 1952, Stone 1997, Boyatzis 2009, Mayring 2014). While deductive and inductive approaches are more straightforward and can be described as processes leading from theory (rule) to result (empirics) and from result to theory respectively, the abductive approach is marked by adding a new idea to both, the rule and the result (Richardson & Kramer 2006). Peirce defines abduction most famously as "*the process of studying facts and devising a theory to explain them*" (Richardson and Kramer 2006), which characterizes this technique's role as a tool to enrich existing theory (Ashworth et al. 2019). It is indeed this theory-enriching attribute, which distinguishes abduction from induction, because it adds to theory, thus incorporates it, rather than it develops theory while disregarding former theory (induction). With the goals of the analysis in mind, which are a) answering the research question regarding evaluation processes and b) explore the concept legitimacy, I chose the abductive technique of inference. Similar to Saz-Carranza and Ospina (2010), I use qualitative content analysis by following a theory-driven step, which uses the existing concepts from theory and assigns them as "themes" to the content but simultaneously remains open to new, grounded codes (Strauss & Corbin 1991), which can be added during reading through texts. That way initially the list of categories (themes) relies on theory, the literature, the interview agenda, or a mix of those and during the coding process it expands when relevant and new themes emerge. Henceforth this abductive manner

of inference can explain data through the elaboration, modification and combination of pre-existing concepts and does not omit the researcher's prior knowledge but rather uses it as a tool to explore new concepts. It leads not only from theory (rule) to result (empirics) but also from result to theory, thus the abductive approach is marked by adding a new idea to both, the rule, and the result (Richardson & Kramer 2006).

Developing categories or themes is not unchallenging, as the complex definition of categories as "*central terms in the cognitive process of learning and memory that create a mental representation of the world*" by Muesseler and Prinz (2002) shows. Especially the construction of categories in practice "[...]is an art. Little is written about it" (Krippendorf 1980, p.76). While the three most frequently used possibilities to develop categories are either from data, from theory or from the interview agenda (Mayring 2014), the choice of abductive theorization allows a combination of all three options. Thus, I derived the categories from the theoretical framework in chapter I with the option to add further categories during the coding process. The first-order codes were then shared with two other coders and assigned to passages in the interviews using QCAmap, which is an open-access software for qualitative content analysis that requires ex ante formulation of categories but also allows to add new themes during the coding process. That way all three coders (including myself) had the possibility to not only use the pre-existing first-order codes but to also add new themes, which they identified as relevant while reading through the collection of interviews. This constitutes the abductive part of the categorization-process. Importantly, all coders read through the content twice, whereas each researcher held each coding session independently and individually. After the first and before the second reading session, when each coder had already assigned the existing codes (stemming from theory and the interview protocol) and developed new codes according to what she identified as relevant themes, the newly emerged themes were

shared and discussed among the team of researchers. This discussion prior to the second coding session helped to clarify new themes, get a deeper understanding of the interview content, and gave each researcher an enhanced repertoire of codes, which could then be applied in the second coding session. Like the first session, each researcher conducted also the second coding session independently, which thereafter led to the final three sets of first-order codes assigned to the content. A second discussion of all themes in the research team, where similarities and differences between the three sets of codes were compared and either adjusted applying the rule of unanimity or alternatively excluded, generated the final and comprehensive list of first-order codes (examples presented in the appendix X. *First and second order codes*). Similar to Gioia et al. (2012) I used these codes to build the foundation of the data structure as shown in the appendix (XI. Example for the data structure).

Following Flick (2018), the material has then been paraphrased to meta-categories (first reduction) and thereafter “similar bundles” have been summarized a second time in more overarching and abstract terms (second reduction).

Chapter III

Results of the empirical analyses

“If there is one feature of reputation on which scholars agree, it is that leaders, policy elites, and national populations are often concerned, even obsessed, with their [...] reputation”

Dafoe et al. 2014, p.327

The elevated emphasis on reputation is not an exclusive feature of recent scholarship in public administration only but has also marked other fields just as much as society in general. The focal point in this chapter however, is not reputation alone but rather reputation in its relation to trust and the variables, which surround these concepts and precede them in the theoretical framework such as the number of policy domains, media coverage and evaluation mechanisms. Moreover the chapter aims to explore empirically the premises in the theoretical framework: The association between number of policy domains and media coverage (H_1), the relationship between media coverage and lobbying action or public opinion (H_{2a} , H_{2b}) and the difference between reputation and trust characterized by an association with performance and values respectively (H_3 , H_4). Following the structure of the MMs design, this chapter is structured the following way:

First the results of the regression analyses applied to all hypotheses will be presented followed by the results of the qualitative analysis. Thereafter the results are compiled in a summary section, which puts the results into the context of the

European Commission and explains how these fit into the theoretical argument of chapter I.

3.1 Quantitative analyses: Results

Media proportionality hypotheses

H₁: The number of policy domains in which the Commission operates influences media coverage over time.

This section first reports the results of some pre-tests, keeping the limitations of time-series modelling in form of autocorrelation in mind. Second it tests the simple Pearson correlation between the two time series data (policy domains and media coverage). Third it investigates rolling correlation of both series; fourth it will demonstrate the predictor-effect of policy domains on media coverage by using a distributed lag model (DLM) and last it will present some robustness checks.

When using time series analysis one central concern is that time series data violates one key assumption of linear regression analysis: Autocorrelation, or the independence of error terms. This means that within time-series data it is likely that error terms of one single variable are related over time, thus not independent, and this can result in an underestimation of the error variance, which ultimately gives the regression an overestimated good fit (Stryker 2003). One conventional solution to address this problem is removing the variable's correlation with itself or making the data stationary (Yanovitzky & Blitz 2000). Due to the fact that it is possible to have stationary data ex ante, the first step in the analysis is performing pre-tests (unit-root tests) in order to choose an appropriate model thereafter and draw inferences (Webb et al. 2020). There are several statistical methods to perform these pre-tests, which are of conventional use in the political science literature. In order to make use of the

versatile repertoire of unit-root tests, I apply not only the conventionally used (Augmented) Dickey-Fuller test (1979) but also add the DF-GLS test (Elliott et al. 1992) and the Phillips-Perron test (1988), which all have the same null hypothesis. For all of them the null hypothesis claims that data at hand has a unit root, or is non-stationary, which must be tested against the alternative hypothesis affirming that the data is stationary. More recently the literature has argued that such tests – even though widely applied – can be in some cases unreliable due to several assumptions and decision, which have to be made *ex ante* by the researcher and could potentially – if not made with enough caution – lead to wrong results (Webb et al. 2019). This is especially a problem and more so confusing when several unit-root tests show different results and thus keep the researcher inconclusive about whether data is classified as stationary or unit root process (Webb et al. 2020). With the aim of avoiding the reliance on one single test, I used all four mentioned different statistical methods to investigate the existence of a unit-root. All test results (using the “*urca*” package in R studio) cannot reject the null hypothesis, indicating that the raw data are non-stationary or have a unit root as shown in table 3.1. This is true for both media coverage and number of policy domains.

Table 3.1

Unit root test

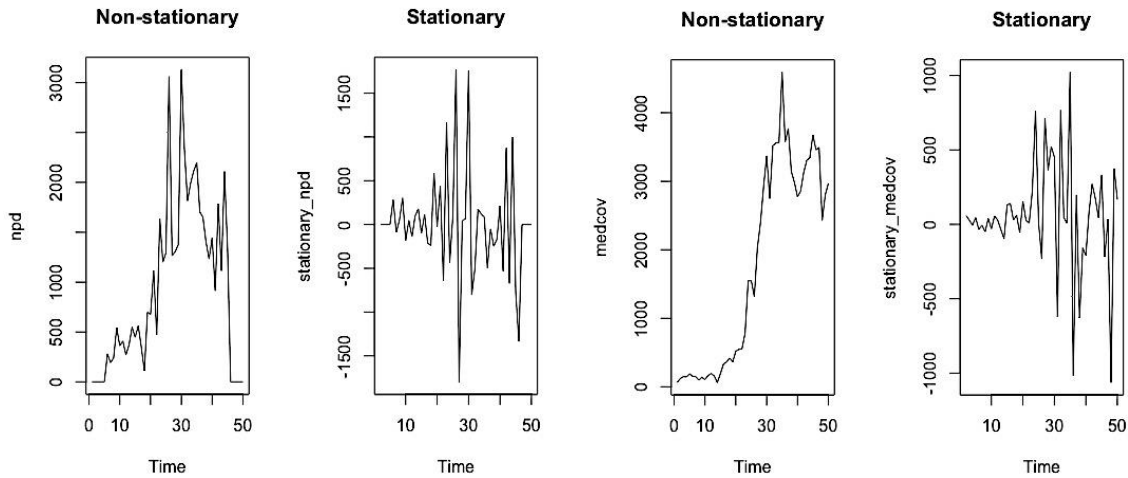
	ADF test statistics
Variable	
Policy domains	-2.62
Policy domains (<i>D</i>)	-10.46*
Media (newspaper)	-1.74
Media (newspaper) (<i>D</i>)	-8.76*
Media (LexisNexis)	-1.98
Media (LexisNexis) (<i>D</i>)	-6.22*

Notes. * $p \leq 0.01$. (*D*) is the variable after first-order differencing.

As non-stationary data can drive incorrect and overestimated results due to autocorrelation, general trends, or seasonality to (Meraz 2011), the data at hand must be transformed into stationary data (reported in table 3.1 marked with *D*). The most frequently used approaches for that are either logarithmic transformations or so-called first order differencing. Since the literature dealing with media coverage has more frequently used differencing (Ostrom 1990, Watt 1994, Stryker 2003, Yanovitzky & Blitz 2000), this method is also my choice for this analysis. The reason for choosing more specifically first-order differencing, which means removing the correlation with the immediately preceding observation, is the frequent usage of this method in the literature analyzing social processes (Watt 1994, Ostrom 1990). First-order differencing is quite intuitive, as it simply uses the difference between each data point and its adjacent data point instead of the original and absolute values of observations (figure 3.1 and figure 3.2). That way the non-stationarity of the data is eliminated and made stationary, which is visible in both graphs to the right side, where no trend is visible anymore.

Figure 3.1: Number of policy domains

Figure 3.2: Media coverage



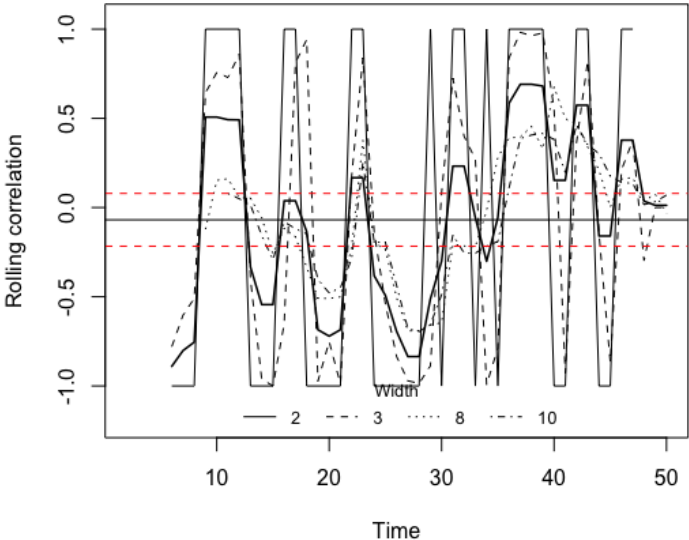
After pre-testing and first-order differencing, I test the correlation between number of

policy domains and media coverage for both measures of media coverage (LexisNexis and newspapers). The simple Pearson's product-moment correlation shows a significant correlation coefficient of 0.27 between the variables "policy domains" and "media coverage".

In order to address the special nature of time series data especially in social sciences, which is characterized by few observations and similar trends of dependent and independent variables (Campbell & Perron 1991, Elliott et al. 1996, Webb et al. 2019), it is important to distinguish between a significant relationship and "noise". One conventional way of testing that is the rolling correlation, which examines the correlation between two time series (Demirhan 2020). However, applying a rolling correlation to short time-series (few data points/observations) common to political science bears the risk of over interpreting white noise as significant signal. With the aim to address this problem Gershunov et al. (2001) advanced the traditional rolling correlation procedure by using a Monte Carlo test approach based on the standard deviations of the rolling correlations. This technique analyses correlations within multiple pre-defined time windows and checks their significance. As policy should have an immediate effect on media coverage but rather no long-term effect or large lag of effect, I chose short windows of 2, 3, 8 and 10 and compared rolling correlations as shown in figure 3.3. For the Monte Carlo simulation I chose 8000 replications recommended by Mundform et al. (2011). The comparison between different widths (figure 3.3) shows that only the standard deviation of a short rolling window (2) is significant while larger widths (3,8,10) indicate no significant correlation between the two time-series as expected. This means that the correlation between the series for a window length of 2 is significantly different from a correlation expected purely from noise. In accordance with the test results, the plot (figure 3.3) demonstrates rolling correlations around the limits of the 95% confidence interval (red dashed line). Each line shows the rolling correlation for each window width while

the bold solid line constitutes the average rolling correlation over the widths. As seen before in the test results, the rolling correlation for the width of 2 varies more than larger widths of 5, 8 and 10, thus indicating a significant association between media coverage and the number of policy domains.

Figure 3.3: Standard deviations of rolling correlations



The result of the rolling correlations confirms the existence of a significant association between number of policy domains in which the Commission operates in and its media coverage, and thus supports H_1 .

In order to investigate the data further and test the claim that policy domains influence media coverage and not the other way around, I applied a distributed lag model (DLM). DLMs offer a “regression-like analysis for time series data” (Demirham 2020, p.1) and operationalize the independent variable by using lags of the independent time series and measuring their effect on the dependent series. That way DLMs assume that the explanatory variable has an effect on the explained variable only after a certain “lag”, which means the effect is not immediately realized but can thus – through this temporal precedence of the independent variable – indicate causality (Granger 1974). Additional to that, DLMs also account for past values of dependent and independent variables as additional predictor-components

and thus exploit the full spectrum of time series data’s information-richness. Among others, this special case of regression model has found applications for example in the examination of taxes in the EU (Nerudova & Dobransch 2019) or the effect of government expenditure and development (Alotaish et al. 2019). It is one possibility to exploit Granger causality and thus suitable for this longitudinal dataset. The intuitive assumptions of the distributed lag model include that the relationship between the variables is linear, that the dependent variable is affected by the independent not immediately but rather after a “lag” (one year in this case) and that precedent observations of independent and dependent variable have an influence on current observations. More precisely, the general distributed lag model can be written as follows:

$$Y_t = \alpha + \sum_{s=0}^{\infty} \beta_s X_{t-s} + \epsilon_t,$$

Where, in this case X is the number of policy domains (independent variable) and Y is media coverage, which is affected by X ’s current and delayed effects of one year. α represents an overall mean effect and the parameters β are the weights of the lag effects of the independent series ($s = 1,2,..$). In the case of the model used here, the infinity over the sum changes to $q=10$ which are the maximum lags chosen for the analysis, thus making it a finite DLM.

Using the recently developed `dlim()` code of the `dLagM` package in R³⁰ automatically generates the optimal lags. Using this model shows a significant effect of policy domains on both measures of media coverage for one-year lags as reported in table 3.2 (LexisNexis) and table 3.3 (newspaper). It shows that the number of policy domains the Commission works in during year t creates media coverage in the next year $t+1$, not however any other year after that. In other words: Policy has a short-

³⁰ <https://cran.r-project.org/web/packages/dLagM/index.html>

lived effect on media coverage, which is no longer than one year. Additionally, we can see from the output (adjusted R-squared) that the number of policy domains in one given year can explain about 26% of the variation in media coverage of the European Commission in the following year for newspapers and 11% for the LexisNexis measure of media coverage. This indicates that the number of policy domains the Commission works in influences its media coverage, and thus supports the first theoretical premise described by H_1 : The number of policy domains in which the Commission operates influences media coverage over time.

Table 3.2

Distributed lag model (DLM)

Variable	Lag	Coefficient
Media (newspapers)	0	.0078
	1	.2429*
	2	.1731
	3	.2091
	4	.083
	5	-.0449
	6	-.0949
	7	.0533
	8	-0.1351
	9	.3552*

Model fit

Adjusted R-squared	.2589
AIC	595.4
BIC	615.66

Table 3.3

Distributed lag model (DLM)

Variable	Lag	Coefficient
Media (LexisNexis)	0	.5331
	1	.3144*
	2	.3855
	3	-.4147
	4	-4.236
	5	-2.6333
	6	-.2675
	7	1.8469
	8	0.9838
	9	.7092

Model fit

Adjusted R-squared	.1093
AIC	839.58
BIC	859.847

Robustness checks

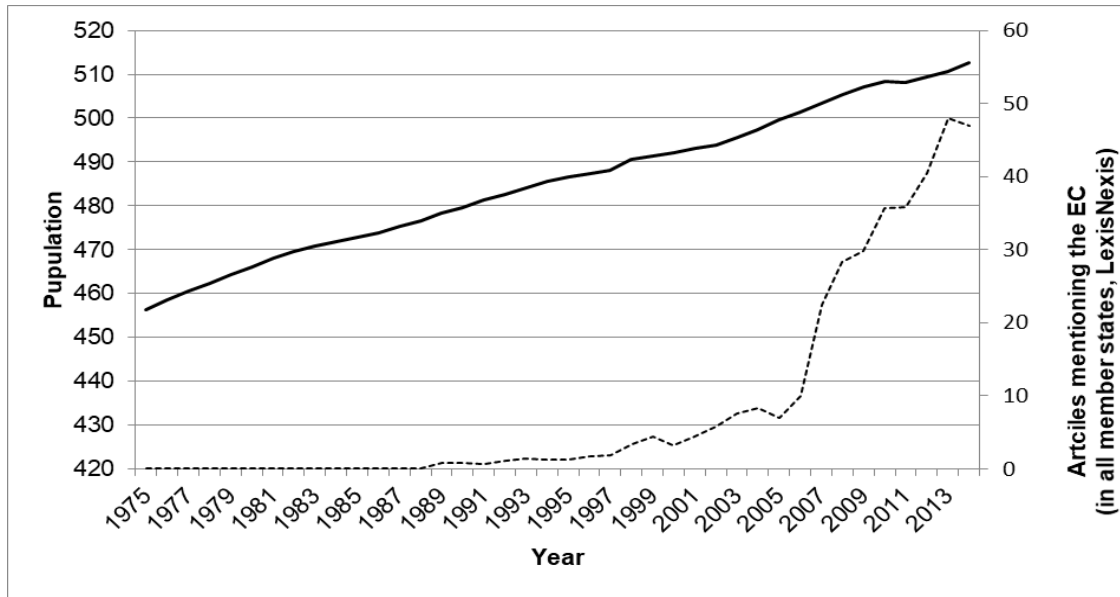
While the demonstrated analysis claims that working in more policy domains increases media coverage of the Commission, these results must be put into the context of an overall increase of population and the EU's expansion over time. To check whether the effect of media coverage is driven by population growth or the EU expansion, I investigate the correlation between media coverage and population using both data sets: The LexisNexis data (EC in newspapers and transcripts), which covers all member states (before and after they have been part of EU) and the major newspaper outlets of the four largest member states (data has been introduced more thoroughly in chapter II).

The LexisNexis database covers media coverage in all member states since 1975, irrespective of when they joined the EU (includes all MS that have been part of the EU in 2014, even if the new member states initially have a very low number of articles). Thus, the LexisNexis data accounts for the increase in absolute population from 1975 to 2014. Figure 3.4 demonstrates this by showing a modest increase in population over time (bold line) from approximately 456 million in 1975 to 513 million in 2014³¹ in all member states included in the LexisNexis measure.

To investigate the increase in population in the EU due to the accession of new member states, I used the second data set covering media in the four largest member states, whereas Germany, Italy and France have been founding members and Spain only joined in 1986. The data also cover all four member states' media coverage since 1975 and figure 3.5 shows that once Spain joined the EU, no significant increase in media coverage is visible.

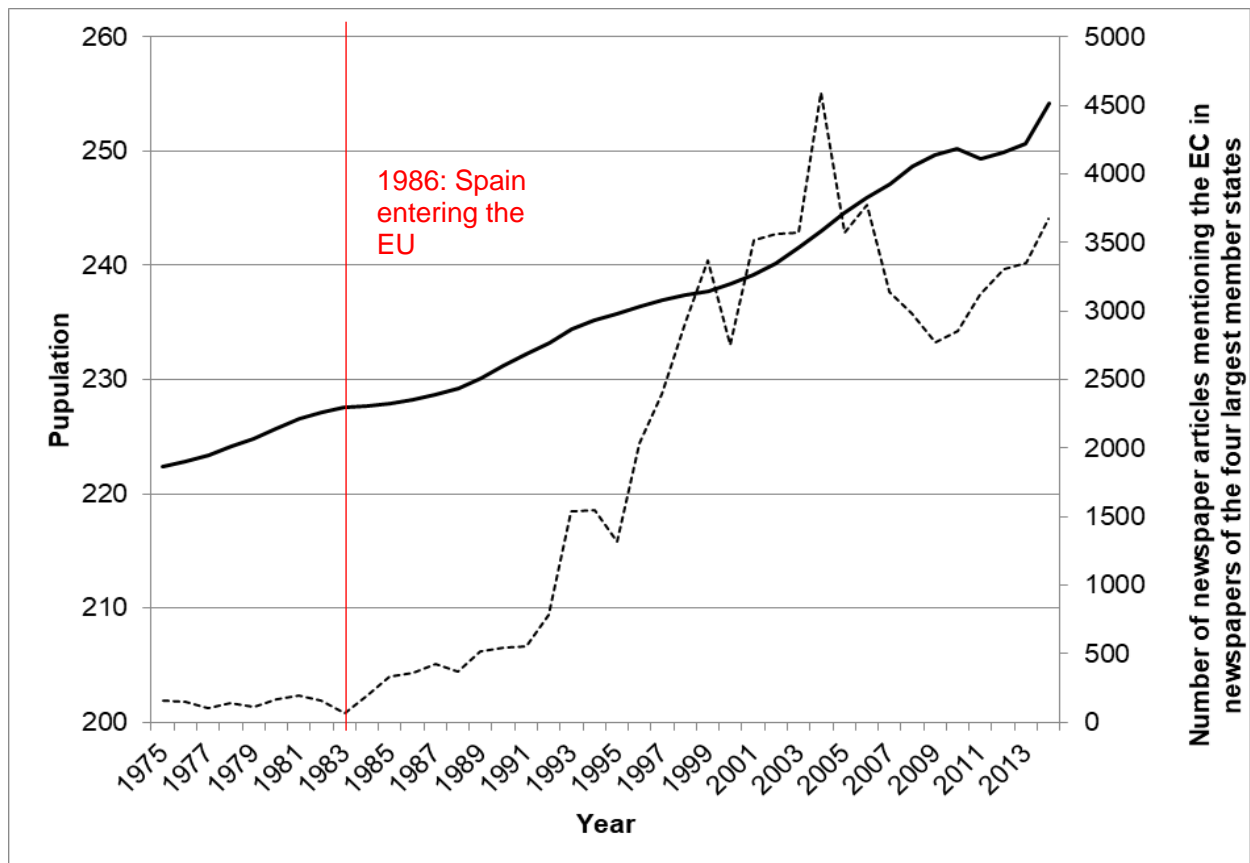
³¹ The population data is based on Eurostat data: <https://ec.europa.eu/eurostat/web/population-demography/demography-population-stock-balance/database>

Figure 3.4: EU 28 population and media coverage in LexisNexis from 1975-2014



Note. Population is reported in millions, number of articles in thousands.

Figure 3.5: Four largest EU member states' population and media coverage in these member states' newspapers from 1975-2014



Note. Population is reported in millions.

Given the data of population and media coverage for all 28 member states and for the subset of the four largest member states, I performed correlation tests and found no correlation for neither of the datasets between population and media coverage as shown in table 3.4. Additional to that, I performed a correlation test between the number of member states and media coverage and linear regressions for both data sets, which also show no correlations nor effects (table 3.5 and table 3.6). This demonstrates that the media coverage of the European Commission over time is not driven by the general increase in population or the accession of new member states. Finally, I also run the distributed lag model including one dummy variable for the East enlargement and one variable for the number of member states, which also did not change the results, indicating no effect of member states on media coverage.

Table 3.4

Correlation tests: Media coverage and population

Four largest member states	
Test-statistic	-.21
p-value	.83

EU28	
Test statistic	.57
p-value	.57

Notes. N=39 (years). The correlation tests use stationary data.

Table 3.5*Correlation tests: Number of member states and media coverage*

LexisNexis	
Test-statistic (t)	.5935
p-value	.5565
Newspapers of four largest MS	
Test-statistic (t)	1.7443
p-value	.0894

*Note. N=39 (years). The correlation tests use stationary data.***Table 3.6***Linear regression: Population predicting media coverage*

	LexisNexis (all MS)	Newspapers (4 largest MS)
Population (all MS)	.00 (.00)	
Population (four largest MS)		.00 (.00)

*Notes. The regressions use stationary data. *** $p \leq 0.01$, ** $p \leq 0.05$, * $p \leq 0.10$. Standard errors in parentheses.***Conclusion**

In summary the preceding analysis confirms hypothesis 1: The number of policy domains the EC is active in influences its media coverage over time. Moreover, the rolling correlations and the distributed lag model show two main results: First, there is a significant association between policy domains and media coverage, in line with

what was described earlier and literature of chapter I. Despite this general agreement in the literature, there are not many studies, which examine the direction of the relationship between media and policy. This is where the second part of this analysis can add to existing work. Modelling policy domain's effect on media coverage by using a distributed lag model shows uses Granger causality to prove the direction of the effect. Even though these results only hold with 90% confidence rather than 95%, the medium fit of 25% (adjusted R-squared) points clearly towards the fact that the number of policy domains can explain a large part of variation in the media coverage of the European Commission.

Nonetheless, this section bears some major limitations caused by the dataset and the omission of other potentially important variables. First, the data only observe the variables policy domains, media coverage and population, which encounters potential omitted variable problems. Henceforth, results have to be interpreted with caution. Taking these data limitations of the section into consideration, it is important to understand that the results regarding the first theoretical premise serve rather as "setting the scene" for the subsequent hypotheses, because this premise sets the base for an alternative analysis of reputation in the Commission compared to conventionally studied agencies. Therefore, the results of this section should give an impetus for researching media coverage more frequently as depend variable in the PA literature and should draw attention to this variable's significance in any public administration.

In line with the theoretical framework in chapter I media coverage of the European Commission depends on the number of policy domains the agency works in, which supports the first theoretical premise empirically. Departing from the investigation of the first argument in the theoretical framework, the subsequent sections will elaborate on two further assumptions: Relative power of interest groups vis-à-vis the public and the competing mechanisms of trust and reputation.

Group-Activity Hypotheses

H₂ For general interest groups more media coverage is associated with a lower level of anticipatory lobbying action (activity) but a higher level of substantive lobbying action (influence).

H_{2b} For special interest groups more media coverage is associated with a higher level of anticipatory lobbying action (activity) but a lower level of substantive lobbying action (influence).

The effect of media coverage on lobbies and the general public is relevant for the overall argument of this dissertation, because the Commission has developed into a multi-purpose agency over time and thus its media coverage has continuously increased. Consequently, it is important to know whether increased media coverage affects the influence of the public vis-à-vis interest groups, which this section examines.

Results

Simple correlation tests between media and lobbying activity and influence reveal an interesting insight: The relationship between media coverage and lobbying is only significant for EU regulations, not however for directives as shown in table 3.7.

The result only holding for regulations could be grounded in the profound difference of regulations and directives. Regulations are binding legislative acts and must be applied in their entirety across the EU. An example would be the regulation on common safeguards on goods imported from outside the EU, whereas all imported products must follow the exact same safety standards in all EU countries. Directives are legislative acts that set out goals, which all EU countries must achieve. However, it is up to the individual country to devise its own laws on how to reach these goals. An example for a directive would be the EU consumer rights directive, which aims to

eliminate hidden charges on the internet. How exactly this goal is achieved, can vary from country to country³².

Table 3.7

Correlation between media coverage and lobbying activity for regulations

	Media coverage (Regulations)	Media coverage (Directives)
General interest groups		
Anticipatory lobbying action	-.04** (.021)	-.00 (.0143)
Substantive lobbying action	.67** (0.301)	.07 (.48)
Special interest groups		
Anticipatory lobbying action	.21*** (.041)	-.00 (.0304)
Substantive lobbying action	.04 (.179)	.07 (.211)

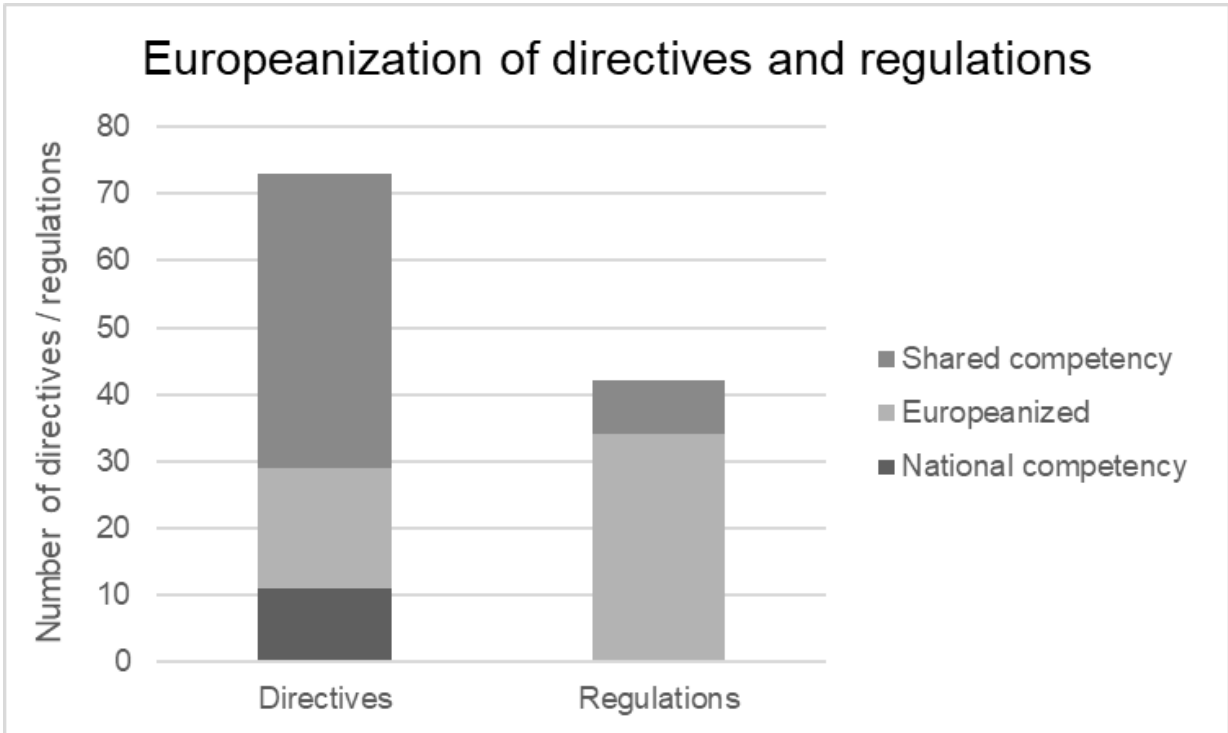
Notes. *** $p \leq 0.01$, ** $p \leq 0.05$, * $p \leq 0.10$.
Standard errors in parentheses.

There is no literature about media coverage and lobbying that distinguishes between directives and regulations, thus this has never theoretically nor empirically been clearly explained. However, the literature points towards two potential reasons why the correlation between media coverage and interest group activity only holds for regulations: First, the effect of media coverage on lobbying in Brussels might only hold for Europeanized policy areas that are actually discussed in Brussels rather than at national level. Generally, one expects regulations to be more Europeanized as they are only developed for issues that fall under EU competency. Therefore, media coverage should matter more for lobby influence in regulations in Brussels, not for

³² These explanations are taken from the official website of the Commission:
https://europa.eu/european-union/law/legal-acts_en

directives, which are less Europeanized and nationally discussed. To evaluate this argument, I looked at all 115 issues of my dataset, categorized them according to their competence ('EU', 'members states' or 'shared competency' according to the Commission's website) and found that indeed regulations are primarily Europeanized while directives are less so (figure 3.6). Second, the influence of media on lobbying might also be only significant at the end of the policy cycle, as "Interest groups have recognized that the locus of activity is primarily a function of the policy cycle" (Coen et al. 2021; p.94). As regulations reach the end of the policy cycle in Brussels and directives in the member states, media might be more influential for lobbying for regulations than for directives.

Figure 3.6



For the sub-set of regulations, the simple correlations are in line with hypothesis 2a: Media coverage is significantly correlated with anticipatory and substantive lobbying activity of general interest groups. The coefficients demonstrate that more media coverage is correlated with less mobilization (-.04) but more influence (.67) of the

general public, as H_{2a} predicts.

Also, the correlation tests are partly in line with hypothesis 2b for special interest groups: Media coverage positively correlates with anticipatory lobbying action (mobilization) but has no significant correlation with substantive lobbying activity (influence).

In summary, simple correlation tests confirm H_{2a} and H_{2b} partly: For general interest groups more media coverage is associated with a lower level of anticipatory lobbying action (activity) but a higher level of substantive lobbying action (influence). While For special interest groups more media coverage is associated with a higher level of anticipatory lobbying action (activity) but shows no significant correlation with substantive lobbying action (influence).

Regression results

Following the simple correlations, I run linear regressions to estimate the influence of media coverage first on general public's lobbying activity and influence (table 3.8) and then on special interest groups' the activity and influence (table 3.9). These regressions should also investigate whether special interest groups really represent the counterpart to public opinion in the policy process and whether they should be seen as competing forces. In other words: Does the general public lose when business lobbies win, and the other way around?

The regressions include additional variables, which could also explain variation in lobbying action, such as public support, the Commission's position in the policy space, the majoritarian preference of the European Parliament and Council.

Table 3.8 shows that when introducing other potential explanatory variables, media coverage has no significant effect on lobbying of general interest groups anymore. The linear regression shows that lobbying of special interest groups best explains the general public's anticipatory lobbying: Interest groups' lobbying activity decreases

anticipatory lobbying action of general interest groups with a coefficient of 0,19. In other words: when special interest mobilizes, it harms public opinion groups' activity. On the contrary for public opinion's actual influence on policy, the only significant effect shows a majority in the European Parliament, which is hardly surprising considering that the EP is the only EU institution that directly represents European citizens.

Table 3.9 summarizes the regression model for special interest groups: It shows that activity of public opinion groups decreases mobilization of special interest groups. For lobbying success of special interest there are no highly significant coefficients despite the Council majority, which has a slightly positive effect on the success of lobbies.

Both linear regressions confirm that public opinion and interest groups can be seen as competing forces trying to influence policy. Each party's lobbying affects the other party's lobbying negatively, thus indicating two counterparties fighting for the two sides of the policy spectrum.

Conclusions

The empirical results confirm the first hypothesis but the second hypothesis only to some extent. On the one hand, for special interest groups more media coverage positively correlates with their lobbying activity but not with their success. On the other hand, for the general public, media coverage correlates negatively with activity but positively with the public's lobbying success. One explanation for these preliminary results could be interpreted as follows: More issue salience strengthens public opinion, because more people know about an issue and have an opinion about it. As officials in any democratic system try to conform to public expectations, and because through high salience expectations are more easily identifiable, public interest groups have to do "less work" to shift policy towards their preferred outcome.

They can leverage on the fact that salience pressures policy towards the preferred outcome of society in general, which happens to be also their preferred outcome. Public opinion groups are thus less active but more successful when media coverage is high. More media coverage is different however for lobbies: Because media coverage increases the public's strength and - considering that lobbies' preferences are on average on the opposite side of the policy spectrum – special interest groups need to fight harder for salient issues, which means they mobilize more. Thus, they tend to show more anticipatory lobbying action in widely known issues when they need to counter public preferences more forcefully. Taking the empirical results into consideration, points in the direction that media coverage is an asset for public opinion and a liability for interest groups. It seems to decrease the general public's need to work for its preferences and increases its probability to be successful. Conversely, it pushes lobbies to work harder and mobilize more, even without guaranteeing any success. As the results only show correlations, they do not claim a clear effect-direction. Therefore, another possible explanation could be that media coverage is the result of lobbying, whereas interest groups could push for getting their arguments into the public discourse via the media.

Thus, rather than closing the chapter and clarifying the effect of media coverage on the two forms of lobbying activity, this analysis has only pointed into a direction for further research. When including several other variables, simple linear regressions do not show a significant causal effect of media on lobbying. Thus, the examination of the two hypotheses create grounds for further research and accentuate the possible effect of media coverage on lobbying action and its understudied nature.

Besides the results confirming the hypotheses only through correlations, the empirical analysis supports the theoretical division of lobbying into two distinct forms: Anticipatory and substantive lobbying action, as developed in the theoretical chapter. Notwithstanding that further research regarding media and lobbying is certainly

needed, the aim of this dissertation is rather to give an overall picture of reputation, trust, and legitimacy issues in the Commission, where the media only plays a supplementary role. Media is certainly crucial but affects those concepts only indirectly by influencing actions of participants in the EU polity.

Media plays an important role as it shapes audiences' perceptions, that create reputation and trust, which then in combination create legitimacy. The sections and hypotheses following now will investigate these theoretical arguments.

Table 3.8

Media coverage and general public

General interest groups		
	Anticipatory lobbying action	Substantive lobbying action
Media coverage	.01 (.022)	0.17 (.262)
Anticipatory lobbying (special interest groups)	-.19** (.059)	-1.12 (.791)
Other activity	0.15 (.135)	-1.97 (1.636)
Public support	.15 (.287)	-4.19 (3.496)
Commission	.01 (.010)	-.24 (.155)
EP Majority	0.00 (.007)	.35** (.106)
Council Majority	.00 (.009)	0.75*** (.128)

Notes. ***p ≤ 0.01, **p ≤ 0.05, *p ≤ 0.10. Standard errors in parentheses.

Table 3.9

Media coverage and special interest groups

	Special Interest Groups	
	Anticipatory lobbying action	Substantive lobbying action
Media coverage	.01 (.061)	0.17 (.356)
Anticipatory lobbying (general interest groups)	-1.41** (.426)	-3.34 (2.582)
Other activity	0.71 (.349)	-1.8 (1.952)
Public support	-1.59* (.718)	9.03* (4.304)
Commission	-.00 (.027)	-.09 (.178)
EP Majority	0.02 (.019)	-.11 (.114)
Council Majority	.00 (.024)	0.44** (.151)

Notes. *** $p \leq 0.01$, ** $p \leq 0.05$, * $p \leq 0.10$. Standard errors in parentheses.

Trust and reputation

H₃: Trust in the Commission is associated with normative expectations (values).

H₄: The Commission's reputation is associated with past performance.

The following section will examine first trust and then reputation quantitatively using logistic and Poisson regressions to investigate the concepts' evaluation mechanisms.

Trust and normative values

To demonstrate how fundamental values and attitudes towards the European Commission influence *trust* in it, I run three nested logistic regression models and also a Poisson regression (table 3.11).

In order to offer a relative comparison between all models table 3.11 shows the Akaike information criterion (AIC), which identifies model 3 as the best fitting logistic regression model. It includes only the three proxies for *value* (membership, benefit, regret) and the variable *sex*, but disregards the socio-political variables *age*, *left-right scale*, and *education*. Additional to the AIC I run an ANOVA based on the likelihood ratio of all models to compute the deviance of each model, whereas the best fit was again found for model 3. Furthermore, I added an analysis of the Bayesian information criterion (BIC), which is based on different assumptions than the AIC and penalizes model complexity more heavily, and again model 3 shows to offer the best fit. These comparisons suggest that a model including all three value-variables but only one demographic variable (*sex*) predicts trust in the Commission best with regards to fit and parsimony. The results are reported in odd ratios (ORs), which offer “a clear indication of how the risk of the outcome being present changes with the variable in question” (Hosmer & Lemeshow, 1989 p.57). In all four models the fundamental attitude regarding membership in the European Union has a significant

positive effect on trust in the Commission. The same is true for the two other value-proxies: The perception of whether being in the Union is a benefit or not and feelings about the EU's potential dissolution also significantly affect trust in the bureaucracy positively. The ORs of the variables measuring fundamental values in table 3.11 are below 1, which indicate lower odds of "success" or in this case lower odds that people trust in the EC. However, these lower odds are due to the ways these variables have been measured. While benefit is a binary variable coded with 1 meaning "*did benefit*" and 2 meaning "*did not*", membership and regret are ordinal variables, whereas the former ranges from 1 ("*a good thing*") to 3 ("*a bad thing*") and the latter has the same range, but 1 means "*feeling very sorry for the dissolution*" and 3 "*feeling relieved*". Taking the coding of these variables into consideration shows that all three value-based predictors increase the odds of trusting the EC. The best fitting model (3) demonstrates that a negative perception of EU membership decreases the odds of trusting the Commission (coded with a higher value of the variable *membership*). More precisely moving one category from perceiving EU membership as "*a good thing*" to "*neither good nor bad*" decreases the odds of trusting the EC by a factor of 0.518. A similar interpretation holds for *benefit*, where "*having a lot of benefit*" is coded as 1 and the opposite attitude "*having no benefit*" is coded as 3. Henceforth also a one-unit change in *benefit* makes the odds of trusting the European Commission 0.452 times smaller. Also favoring the dissolution of the EU compared to *feeling sorry* decreases the odds of trusting the Commission by a factor of 0.427. Therefore, the effect of values on trust in the Commission can be summarized as follows: Fundamental values, which are in line with the Commission's values (like favoring membership, disfavoring dissolution), increase the odds of trusting the bureaucratic agency, while values which are not in line with the Commission's values have the contrary effect. This supports hypothesis 3 and claims

that normative expectations based on values have a significant positive effect on trust in the Commission.

Table 3.11 also shows that of all additional variables (other than values), only *sex* has a significant effect on trust. The coefficient indicates that being female as opposed to being male produces a 0.25 (log-odds table) unit change in the log-odds of trusting the EC, or in other words increases the odds of trusting the European Commission by a factor of 1.28 (ORs table). Surprisingly *age*, *education*, and the *position on the left-right scale* of the political spectrum have no significant effect on trust in the supranational institution. This is interesting because it is in contradiction with the political approach explaining Euroskepticism (Abts & Heerwegh 2009), which argues that political understanding - often determined by education - influences trust in EU institutions. It is also surprising because age – especially the divide between young and elderly - and political orientation have typically shaped the landscape of the European political discussion in the past decades, played an important role in the Brexit aftermath and are often considered to be of influence when it comes to EU-matters (Ford & Goodwin 2017). Additional to the socio-economic variables, model 4 also includes GDP growth, which serves as a proxy for performance. As *performance* has not been measured in the same years as *trust* (appendix VI), I used the EU's annual GDP growth rate³³ from the preceding year to measure an evaluation based on past performance. In line with the theoretical framework, model 4 shows that performance (GDP growth) has no significant effect on trust.

Additional to the logistic regression, table 3.11 shows the Poisson regression results. These results also show significant effects of all three value variables (*membership*, *benefit*, and *regret*) on *trust*, while the other variables *sex*, *age*, *left-right scale*, and *education* are not significant. Model 1 of the Poisson regressions is a pooled model, while model 2 uses country and year fixed effects. Model 2 of the Poisson

³³ Source: <https://data.worldbank.org/indicator/NY.GDP.MKTP.KD.ZG?locations=EU>

regressions shows that a one-unit change in the variable *EU membership*, changes the expected log count of *trust* in the Commission by 0.08. Also, each one-unit increase in benefit and regret increases the log count of trust by 0.12 and 0.11 respectively. Similar to the logistic regressions, the other variables *age*, *left-right scale* and *education* have no effect on trust while *sex* is only slightly significant. The Poisson regressions also confirm that values, which are in line with the Commission's values, increase trust in the Commission, which is in line with H_3 and holds when including country and year fixed effects.

In combination the logistic and the Poisson regression results show that citizens' values in line with the Commission's values have a significant positive effect on *trust* in the European Commission in line with H_3 . Moreover, these results explicitly show that the alignment of personal values with the values of the Commission's values and priorities increase the probability of trusting this bureaucracy more than *age*, *education*, *political positions on the left-right scale* and *performance* measured by GDP growth. Besides supporting H_3 these results also indicate the relative importance of citizens' fundamental core beliefs compared to socio-political attributes, demographics and economic performance of the EU when it comes to trust in a multi-purpose agency like the European Commission. To conclude and answer the second research question: Trust in the European Commission is indeed associated with citizens' fundamental values.

Table 3.11
Results: Logistic regression and Poisson regression

	<i>Logistic regression</i>				<i>Poisson regression</i>	
	Trust				Trust	
	(1)	(2)	(3)	(4)	(1)	(2)
Membership	-1.480*** (0.027)	-0.654*** (0.037)	-0.658*** (0.037)	-0.658*** (0.037)	.091*** (.014)	.088*** (.014)
Benefit		-0.790*** (0.051)	-0.793*** (0.051)	-0.792*** (0.051)	.123*** (.02)	.117*** (.02)
Regret		-0.842*** (0.037)	-0.850*** (0.037)	-0.850*** (0.037)	.110*** (.013)	.108*** (.014)
Sex			0.245*** (0.040)	0.248*** (0.040)	-.029* (.014)	-.028* (.014)
Age				0.001 (0.001)	-.000 (.000)	-.000 (.000)
Left-right scale				0.015 (0.010)	-.002 (.003)	-.001 (.003)
Education				0.006 (0.007)	-.000 (.002)	-.002 (.003)
GDP growth				-.0449 (.039)		
Constant	3.032*** (0.047)	4.298*** (0.068)	3.967*** (0.086)	3.821*** (0.120)	-.153*** (.041)	-.164** (.052)
Country FE						Yes
Year FE						Yes
Observations	15.998	15.998	15.998	15.998	15.998	15.998
Log Likelihood	- 8,316.586	- 7,824.757	- 7,806.113	- 7,804.386		
Akaike Inf. Crit.	16,637.17	15,657.51	15,622.23	15,624.77	37 123	37 127

Notes. *p<0.1; **p<0.05; ***p<0.01. Results are reported in odds ratios for the logistic regressions.

Reputation and performance

H4: The Commission's reputation is associated with past performance.

In order to examine the effect of *performance*, I run three distinct regressions, which include performance and value variables using adjacent categories models. To demonstrate the comparison between the models' fit table 3.13 reports deviances, Akaike and Bayesian information criteria for each model. All three model-comparison criteria identify model 3, which includes performance and value variables, as the best fitting one. Table 3.13 shows two estimates for each independent variable: The first estimate corresponds to the probability of a medium reputation (category 2) versus a good reputation (adjacent category 1) of the Commission while the second estimate corresponds to the probability of a bad reputation (category 3) versus a medium reputation (adjacent category 2) of the Commission. As log-odds are less intuitive table 3.14 shows marginal effects, which aid the effect interpretation. The regression analysis demonstrates that all variables are significant with the exceptions *education* and *position on the left right scale*. These two variables, however, are only insignificant when it comes to the comparison between *medium* and *bad* reputation, which indicates that the probability of choosing *bad* over *medium* reputation does not depend on the level of education nor on the left right scale position. On the contrary the variable *performance* in table 3.13 is significant in both cases, which is evidence for hypothesis 4, claiming that performance indeed influences reputation positively. Similar to the models used for trust, I also included GDP growth as another measure for performance. Model 3 shows similar to the Eurobarometer measure of performance, also the objective performance measure *GDP growth* is highly significant for reputation. Table 3.14 shows marginal effects, which are defined as the change in probability of choosing a category when the independent variable changes by one unit. For *performance*, which ranges from 1 (good) to 5 (bad), a one-unit

change decreases the probability of a good reputation by 5 percentage points meanwhile it increases the probability of a medium and bad reputation by 3 and 2 percentage points respectively. These effects go in the same direction as hypothesized by H_4 and indicate that performance positively affects reputation. More precisely if an individual's evaluation reports negative past performance, this individual's reputation of the Commission is likely to drop. GDP growth shows a similar effect in line with what was hypothesized: a one-unit change in GDP growth increases the probability for a good reputation by 3.6%. Even though effect sizes of both *performance* measures are small, they are significant, which emphasize the importance of this variable when it comes to reputation. Looking at marginal effects (table 3.14) of other significant explanatory variables such as *sex* indicates that being female increases the probability of a evaluating the Commission with a good and with a bad reputation by 0.5% and 2.1% respectively while it decreases the probability of giving it a medium reputation by 2.6%. *Education* and *the position on the left-right scale* are both only significant when it comes to the two categories good and medium reputation but marginal effects are below 1% with the exception of political position, which increases probability to give a good reputation by 1.1% when shifting one unit towards the right on the 10-point left-right scale. The last variable *age* is in both cases significant but also lacks substantive effect size with marginal effects below or equal to 0.001.

With the limitation of effects sizes that are not entirely satisfactory, the ordinal logistic regression analysis supports hypothesis 4, which claims that reputation is associated with past performance of the bureaucratic agency. When introducing variables capturing values (benefit, membership, regret, EU government, unification) the effect of performance remains significant. To investigate the difference between trust and reputation further, table 3.12 shows a more direct comparison. Running bivariate regression models, where each of them use *GDP growth* as the explanatory and *trust*

and *reputation* are the explained variables shows that the objective performance measure has only a significant effect on reputation, not however on trust. This is an additional indication that *trust* and *reputation* are intrinsically distinct, even if they have common confounding variables.

Tying these results back to the theoretical framework: Chapter I theorized that evaluation based on values is *trust* and typically used by citizens. Evaluation based on and performance is reputation and rather used by interest groups. The empirical analysis shows that indeed values affect trust positively while performance affects reputation positively. Furthermore, values also play a role for performance however, the additional measure of past performance (GDP growth) does only affect reputation and has no effect on trust.

In combination the regression analyses for hypotheses 3 and 4 demonstrate a first attempt to measure the evaluative nature of trust and reputation. They show that value-based measures drive trust. Even though regressions using the survey measures only show that performance and also values drive reputation, introducing an additional proxy for performance (GDP growth) reveals the fine-grained distinction between the two concepts: Past performance has a significant positive effect only on reputation and is insignificant for trust.

Table 3.12

Linear regression: GDP growth predicting trust and reputation

	Trust	Reputation
GDP growth	.003 (.019)	.095*** (.006)

Notes. ***p ≤ 0.01, **p ≤ 0.05, *p ≤ 0.10. Standard errors in parentheses.

Table 3.13

Logistic regression results: Adjacent category model

	(1)	(2)	(3)
Performance (1)	.253*** (.017)	0.244*** (0.017)	.122*** (.019)
Performance (2)	-.047* (.019)	-0.047* (0.020)	.013 (.021)
Sex (1)		-0.154*** (0.039)	-.285*** (.042)
Sex (2)		0.255*** (0.044)	.315*** (.045)
Education (1)		0.032*** (0.006)	.055*** (.007)
Education (2)		-0.006 (0.007)	-.016* (.007)
Political orientation (1)		-0.051*** (0.009)	-.037*** (.01)
Political orientation (2)		0.006 (0.010)	-.005 (.011)
Age (1)		0.007*** (0.001)	.007*** (.001)
Age (2)		-0.005** (0.001)	-.005*** (.001)
Unification (1)			.488*** (.031)
Unification (2)			-.129*** (.031)
European government (1)			.764*** (.047)
European government (2)			-.376*** (.051)
EU membership (1)			.441*** (.045)
EU membership (2)			-.212*** (.044)
Benefit (1)			.744*** (.057)
Benefit (2)			-.192*** (.058)
Regret (1)			.34*** (.043)
Regret (2)			-.118** (-0.044)
GDP growth (1)			-.105*** (.021)

GDP growth (2)			-0.075*** (.022)
Intercept (1)	-1.608*** (.058)	-1.543*** (0.116)	-5.089*** (.149)
Intercept (2)	.236*** (.068)	0.093 (0.134)	1.487*** (.155)
Deviance	37482	37350	33880
AIC	37490	37374	33924
BIC	37521	37468	34096

Notes. Coefficients are reported in Log Odds. Standard errors in parentheses. (1) shows the probability to change from medium to good reputation (2) shows the probability to change from bad to medium reputation; *** $p \leq 0.01$, ** $p \leq 0.05$, * $p \leq 0.10$.

Table 3.14
Marginal effects

	Reputation model without values		
	<i>good</i>	<i>neither</i>	<i>bad</i>
Performance	-0.051	0.029	0.023
Sex	0.005	-0.026	0.021
Education	-0.007	0.004	0.003
Political orientation	0.011	-0.006	-0.005
Age	-0.001	0.001	0.0001
(Intercept)	0.348	-0.173	-0.175

	Reputation model with values		
	<i>good</i>	<i>neither</i>	<i>bad</i>
Performance	-.031	.014	.017
Sex	.029	-.044	.015
Education	-.011	.007	.004
Political orientation	.009	-.004	-.005
Age	-.001	.001	.000
Unification	-.099	.061	.039
EU government	-.134	.101	.033
EU membership	-.078	.058	.020
Benefit	-.152	.092	.060
Regret	-.066	.043	.023
GDP growth	.036	-.008	-.028
(Intercept)	1.021	-.636	-.384

Notes. Marginal effects can be interpreted as the change in probability of choosing a category when the independent variable changes by one unit.

Summary: Quantitative analyses

The tested hypotheses of the quantitative analyses deliver three insights: Working in more policy domains increases media coverage (H_1), media coverage pronounces the general public's power to influence policy vis-à-vis interest groups (H_{2a} and H_{2b}) and trust and reputation rely on two distinct evaluation processes (H_3 and H_4). In detail the quantitative analysis has shown the following:

First, unlike conventionally studied bureaucratic agencies, the European Commission works in many policy domains, which increased its media coverage over the years (H_1). By using newly collected data of media coverage and the comparative agendas project the time series modelling uses Granger causality to show that working in more policy domains over time has a significant positive effect on media coverage. These findings hold even when controlling for a general trend in media coverage over time, an increase in population and EU member states and are significant with 90% confidence. Therefore, the analysis supports the first premise of the theoretical framework: Because the Commission is a multi-purpose agency and works in more policy domains, it experiences more media coverage.

Second, media coverage has distinct effects on lobbying of special versus general interest groups (H_{2a} , H_{2b}). The analysis confirms two theoretical premises of the dissertation: On the one hand it supports the theoretical distinction between anticipatory and substantive lobbying action, which differ in their final outcomes (mobilization and influence respectively). On the other hand, it discovered the distinct effects of media coverage on lobbying actions: While for special interest groups more media coverage increases anticipatory lobbying action (mobilization) however, has no effect on substantive lobbying action (success), for general interest groups the inverse is true. More media coverage decreases anticipatory lobbying action (mobilization) but increases substantive lobbying action (success). Thus, hypotheses 2a and 2b confirm that for a multipurpose agency like the European Commission,

which experiences more media coverage, general interest (public opinion) is more important than special interest group lobbying. In other words: Working in many policy domains and thus being covered more extensively in the media increases the relative power of public opinion vis-à-vis special interest.

Third, the analysis has demonstrated a way to differentiate between trust and reputation based on evaluation processes. In line with H_3 and H_4 regression results point in the direction that trust is based on values and independent from performance, while reputation is an evaluation based on performance, while values also play a role. Empirically using the Eurobarometer trendfile has demonstrated that there is a significant positive association between trust and values, whereas three proxies for fundamental values predict trust and that more so than other conventionally used socio-political variables. The association between reputation and performance has also shown to be significant, however values do play a vital role for reputation as well. This supports hypothesis 4 by indicating that better past performance is a good predictor for a generable favorable reputation of the European Commission.

While these results indicate that reputation and trust are distinct, the quantitative analyses do not offer a simultaneous measure of trust and reputation in the same year, because they have not been measured in the same year. Additionally, the fact that the data only measure perceptions by *citizens* disregards one part of the theory laid out in chapter I: Reputation is based the evaluation process based on performance created by *interest groups* while trust is based on the evaluation process based on values created by *citizens*. To address these issues, the qualitative part of the mixed method will follow up on this and investigate the evaluation mechanisms underlying trust and reputation and the groups using them. With this in mind, the next section will showcase the results of the qualitative content analysis.

3.2 Qualitative Analysis: Results

The section below is structured along the two objectives of the qualitative analysis: a) comparing evaluation processes of citizens and interest groups and b) exploring the concept legitimacy and its role for the European Commission.

Evaluation processes: Citizens and interest groups

In order to investigate the evaluation processes, this section addresses how *citizens and interest groups evaluate the Commission*.

Former theory explained that evaluation processes are comparisons, which can differ according to the point of reference they employ. This comparative core of the evaluation process, and its difference between citizens and interest groups, is the focus of the analysis. In order to explore this, I derived the evaluation mechanisms for each group from theory, which claims that citizens evaluate the Commission based on values and interest groups based on performance. Values are so-called deep-core beliefs (Sabatier & Weible 2007, Matti & Sandström 2011), which are personal norms that are hard to change and are relatively constant over time. Performance on the contrary is determined by competence, efficiency, skills, and capacities (Carpenter & Krause 2014). Civil servants, who experience daily different judgements people make about their agency, should be able to tell which evaluation mechanism is used by which type of audience. Respondents could clearly distinguish between interest groups and the general public, which confirms the theoretical distinction between these groups. However, the evaluation mechanisms used by citizens and interest groups were less clearly separated as theory would predict and revealed new insights about citizens' evaluations.

Citizens' evaluation process

The abductive analysis of citizens' evaluation process revealed that there are two types of evaluation processes but also that what happens before evaluation plays a crucial role. Given that the method also stayed open to other descriptions of citizens' evaluation processes, revealed that indeed evaluation is based on values, but also on results. Furthermore, evaluation depends on two pre-conditions: Awareness of the agency and connection to daily life.

Preconditions for evaluation: Understanding, information and connection to daily life

Civil servants explain that understanding of and information about the Commission are crucial for citizens' evaluation. They argue that "*citizens often don't have a clue about the Commission*" (Interviewee 7) and therefore do not even try to evaluate it. However, they also voice that citizens, who understand it better and have more information about it, would evaluate it more positively. Interviewees report that information and awareness are fundamental preconditions in order to be able to evaluate the Commission, but simultaneously these conditions are often lacking along two dimensions: The institutional and the policy dimension. Many citizens lack understanding and information about the Commission as institution embedded in the complex institutional framework of the entire European Union. They are unable to clearly identify which role the Commission plays in the complex system of EU institutions. Consequently, ordinary citizens are often incapable of evaluating the Commission separately from other EU institutions or the EU as a whole:

"Citizens don't know what role the Commission plays, what the Parliament and the Council play" (Interviewee 1).

“Citizens do not have their own opinion about us. Absolutely not. Often, they don't have a clue about the Commission or the Council or the Parliament.”

(Interviewee 7)

In combination the interview data reveals that citizens' evaluation of the Commission is not a given, but rather heavily dependent on whether citizens are even aware of the role the EC plays. However, the gap of EU-institutional knowledge is not the only problem for citizens to be able to evaluate the Commission. Also, information and understanding of *policies* that the Commission conducts play an important part in citizens' evaluation process. Civil servants describe the misunderstanding of certain policies or the lack of information about the policy's real implications as another often-missing precondition that can influence whether and how citizens evaluate the Commission:

“When it comes to the policies that we make in, for example, genetically modified food, you still see a strong scepticism among Europeans when it comes to these new technologies. Therefore, I really think it depends on the topic and whether people know about it, and whether people are informed on such topics.” (Interviewee 2)

Citizens are often unaware of what the Commission is doing and cannot follow its policies nor their outcomes. The complexity of policy makes it difficult for citizens to follow and create meaningful connection from policy to the Commission as institution. Either they simply do not understand what policies are made or cannot connect them to outcomes. In combination this very high complexity is a barrier for ordinary citizens to evaluate the Commission.

“When I am working on a policy I always think about what would citizens think about? And I often then realize that citizens would probably not even understand a word. Too technical, too complex.” (Interviewee 4)

In combination, civil servants report that citizens' evaluation process depends on the information and understanding they have before even a judgement can be made. This initial awareness of the institution and its policies is not a prerequisite in practice. Empirically it is clearly visible that information and understanding serve as first gatekeepers before actual evaluation happens. And in many cases, these gatekeepers keep citizens away from actually evaluating the European Commission. Only if the preconditions are met, an evaluation happens. Furthermore these preconditions can be divided in two dimensions: Understanding of the institution itself but also of the policies it conducts. Only when citizens understand the role of the EC as institution and also the policies it conducts, they actually evaluate the European Commission.

Connection to daily life

People's evaluation of the Commission also heavily depends on the connection they can draw to daily life according to civil servants. This is similar to the pre-condition of understating policy, but somewhat different, as understanding is a requirement for connection to daily life, but connection to daily life not a requirement for understanding. Considering this, the connection to daily life can be interpreted as a deeper relationship between citizens and the Commission's actions. This deeper relationship, which holds understanding as a necessary condition, can then create a semantic evaluation. In other words: the relevance of the Commission's action in day-to-day activities influence whether citizens evaluate the agency positively or negatively:

“For example, a student that goes on an exchange with Erasmus will probably think that it [the Commission] is great. And maybe we understand it is much easier to pay with the same currency when you go on a holiday. Okay that is fine, they might see and understand that. And then maybe someone will

see a sign on the bridge that says this bridge was built with EU funding, but I think there are very few practical consequences for the people that they can actually understand.” (Interviewee 6)

However, relevance and the tie to daily life do not automatically produce positive evaluations of the Commission. The connection to quotidian life is rather an opening door that allows people to make a judgement however, without guaranteeing in which direction this judgement goes. In the words of one of my informants:

“The ones [DGs] that are more problematic are the ones that really work at the core of the people's life. I am thinking of DG MARE, fisheries, DG AGRI in agriculture... Lots of challenges in the recent years with unemployment, with segments of the industry who had to close. And very often Brussels seen as being responsible for that.” (Interviewee 3)

Thus, being in contact with the Commission in some way during daily life can significantly influence how people judge the agency. A better connection to daily life makes evaluation simple but at the same time stronger and more dependent on personal preferences. Civil servants explained that – once people can connect the EC to their daily life – their evaluation heavily depends on how they connect it to their personal preferences, problems and experiences.

In combination civil servants explain that first, evaluating the Commission is not happening without certain pre-conditions in place: Information or understanding and the Commission's tie to daily life. If citizens meet the first precondition of *understanding* and *being informed* about the Commission, they might be able to evaluate it. However, there is a second gatekeeper, which helps them evaluate the Commission: its *connection to daily life*. The second gatekeeper can be crucial for the direction in which evaluation goes: positive or negative.

Given that the theoretical framework has not elaborated on this before, the qualitative analysis reveals novel insights about what happens before citizens' evaluation

process takes place. Especially the second pre-condition – connection to daily life - confirms the theory of street level work, which emphasises that direct contact of agencies with the general public plays a major role in shaping views (Spink et al. 2021, Dubois, 1999; Lipsky, 2010; Siblot, 2002). More generally, understanding and the connection to daily life make the Commission more relatable but also more known and thus they serve as important pre-conditions for the evaluation mechanisms.

Outcomes and results

Civil servants emphasize that outcomes or results are important for ordinary citizens and the public evaluates the Commission based on them. This description contradicts the theory developed in chapter I, which argues that performance-based measures are solely used by interest groups to evaluate the Commission. The reason for interest groups to use this evaluation rather than citizens, is that the complexity of the Commission's policy should make performance-based evaluations impossible for ordinary citizens. However, from the qualitative content analysis it emerges that once the preconditions *understanding* and *connection to daily life* are met, citizens are able to judge the Commission based on results:

“Now of course this is not enough to announce the priorities, we need also to deliver results. [...] people will judge us in a few years based on if we manage to deliver [...].” (Interviewee 12)

“Is that what is being said being done? [...] what they want is that all these promises are fulfilled, and this is an obligation of result.” (Interviewee 24)

Unlike theory predicts, civil servants do not exclude the performative dimension of citizens' evaluation processes. Similar to governments, which want to deliver on their promises, the officials also emphasize the Commission's role to deliver results. They

explain that citizens also use evaluation based on results, but only when information, understanding and connection to daily life as pre-conditions path the way to an outcome-based evaluation process. However, the interviews reveal that outcome-based evaluations have to be simple enough for citizens to comprehend. Thus, not all policies and action of the Commission can actually be judged based on performance, because they are simply too complex. Especially in areas where complexity is too high and pre-conditions of understanding and connecting to daily life are not given, citizens refer often to value-based evaluations as the next section shows.

Values

The theory-based prediction emphasizes the central role that values play in citizens' evaluation processes. Everyone holds values, they are simple and not conditional on anything but rather intuitive and deeply rooted. The qualitative content analysis confirms that values play a dominant role in practice and thus form the second type of evaluation process for citizens. However, unlike the evaluation process based on results, value-based evaluation does not require any pre-conditions like information or understanding to be used by citizens. This highlights the simplicity of value-based evaluations, which marks a major strength of this evaluation process, as anyone can actually use it. In any democratic system, where majorities play an important role, an evaluation process that can be used by the majority of citizens can be a crucial force. Interviewee 11 explains how citizens' evaluation can be based on values by referring to some general values such as solidarity, human rights, and rule of law:

“The work during the migration crisis that the European Union or at least the Commission said we need also to have solidarity with the refugees, [...]. This was part of our values. Or that the Commission stands up for the rule of law,

even if you have opposition [...] And these are fundamental values in the European Union. So, this is very important to be trustworthy [...].”

Not only are value-based evaluation simple and thus can be used by everyone, no matter the knowledge or understanding of the Commission, but also have value-based judgements increased in recent times according to many civil servants. Interviewee 12 demonstrates that the importance of values and its recent rise:

“Since the last 3 years what we could indeed see is on the one hand people started to reflect: What does it mean for us? For us as EU? And what does BREXIT mean? What does it mean that you have governments that are in breach of classical principles of European universal values, such as democracy and rule of law? And people were really concerned about that.”

Values seem to be gaining importance according to civil servants, on the one hand visible by the fact that many respondents mention them, but also by the fact that most respondents can easily tell a story about values, explain their role for the Commission and how they matter in the EC’s exchange with the general population. Despite the recent increase in importance of values, civil servants often explain that values have always been a fundamental ingredient of the European Commission, and continue to be that, as respondent 13 explains:

“People I think perceive that this European project is based on values. And in some countries, especially France and Germany, the peace element is still very strong. And people tell us peace is one of the key ingredients of the European project. So, I think yes, people have this perception that Europe is based on values.”

Generally, the interview script shows an exacerbated occurrence of value-based evaluations by citizens. Civil servants explain that values are an easy way to connect to people and that similar values are the most common denominator that all Europeans hold, no matter from which member state they are. Especially the

difference in values in Europe compared to the outside world seems to be an important base on which the Commission can communicate and connect to citizens. This confirms the dissertations' theoretical claim that citizens judge based on values. Civil servants explain that generally, easy to understand and holistic values play a major role on which the general public judges the Commission. Values and results play an important role for citizens and often also are used together. Looking at the whole picture reveals that performance-based results and values in combination constitute citizens evaluation mechanism and that these two mechanisms are not clearly separable in practice:

“Both [values and performance] belong together. So if you have for example only delivery on something without values behind, we do not gain trust with that. If we defend our values but are unsuccessful we may still have trust, but we have lower trust, because people will say ‘the Commission says a lot, but it has no actual consequences.’” (Interviewee 14)

The interview script shows that generally, civil servants often explain that citizens care about values as well as outcomes and results and they cannot clearly be separated. However, while values are simple and straightforward results must be observed and are often difficult to link to complex policies.

In summary the abductive approach shows that citizens' evaluations can be value or results-based, but which evaluation process is used might depend on the preconditions of understanding and connection to daily life. Putting the inductively derived determinants of citizens' evaluation processes in relation demonstrates two evaluation processes for ordinary citizens, which civil servants report: Citizens evaluate the Commission based on values but also based on results. The core difference between these processes are the pre-conditions. While *value-based* evaluations do not depend on pre-conditions, and thus can be used by every citizen disregarding her knowledge about the Commission, *results-based* evaluation

processes require a minimum level of understanding and information in the first step and connection to daily life, which allows citizens to concretely judge the Commission's outcomes, in the second step. Therefore, understanding and connection to quotidian life serve as gatekeepers, which must be met for a results-based evaluation of the Commission can happen. This also leads to the inference that results-based evaluations of the Commission by citizens are more complex, need more resources as people first need to gather information or get in contact with the EC. Value-based evaluations are simpler, in no need of pre-conditions and available to every citizens no matter what her experience or knowledge of the EC is. In summary, the interviews reveal that results *and* values play crucial roles in citizens' evaluation processes.

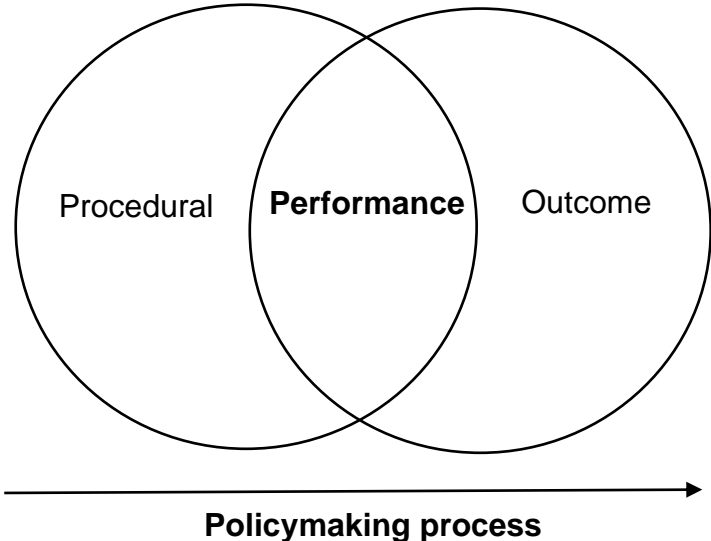
Drawing back to the research question, which asks about the difference of evaluation processes between citizens and interest groups, the next section will now explain the results of the content analysis referring to interest groups' evaluation processes and then conclude whether the processes are distinct, as theory predicts.

Interest groups' evaluation process

The abductive analysis again relied first on the theoretically derived evaluation process: For interest groups evaluation of the Commission is based on performance of the agency. While staying open to other evaluation processes that civil servants report, this evaluation process was empirically the most pronounced one for lobbies. Moreover, the qualitative data revealed that lobbies are so familiar with performance that they can even distinguish between different types of performance and see it as a two-dimensional concept. The empirical analysis shows that interest groups' evaluation process is in combination based on *procedural* and *outcome-related*

performance. While the first dimension plays a greater role before and during the policy making process, the latter dimension (outcome-related) can only be evaluated after the policy-making process finished as shown in figure 3.7. In combination, the content analysis derives two performance-based evaluation processes used by interest groups, which are used by lobbies and depend on the stage of the policy making process.

Figure 3.7: Two dimensions of performance observed by interest groups



Evaluation based on procedural performance

Civil servants report that interest groups strongly rely on performance, when evaluating the Commission however not only in form of outcomes and results. Many civil servants also draw on classical Weberian accounts like expertise and procedural performance when they explain interest groups’ evaluation processes:

“[T]hey would evaluate us on the substance, the level of expertise that we have, and they could judge this either in their bilateral context with my individual colleagues, or as well, in the quality of the documents that we put out for public consultation.” (Interviewee 18)

In practice lobbies take the Commissions' procedural performance and what the agency does before and during policy making into account when evaluating it. This reveals that – unlike citizens – lobbies have a much deeper understanding about the Commission's actions to such a point that they do not only care about final outcomes or result-based performance but also observe the Commission's procedural performance as a bureaucratic agency. Other than citizens, who care about outcomes and see the Commission as a political actor judged based on results, lobbies acknowledge the bureaucratic heart of the Commission by actually paying attention to procedures and expertise, which constitute the heart of a bureaucracy. The procedural performance observed by interest groups includes listening to lobbies' concerns, considering their standpoints and for example finding a compromise between different interests. Lobbies are aware that the Commission cannot always change outcomes to their preferred one, but they appreciate when the Commission takes their concerns into consideration, independent of the final outcome:

“They [interest groups] would evaluate the Commission on the basis of, of being approachable, or at least listening to their concerns. Or to listen in balance. And whether the Commission listens to all the different interests, which are at stake.” (Interviewee 19)

Especially the listening element is described by civil servants as a crucial procedure during and before policymaking for lobbies:

“I think that the criteria to assess the Commission's capability to take into consideration the positions of the various interest groups.” (Interviewee 24)

Civil servants show that interest groups care about the way to achieve final outcomes, or the Commission's procedural performance in terms of general expertise and knowledge but also in terms of openness and reciprocity. Especially the listening element was more often used by respondents of the second interview session (2021), which is not surprising given the new element of listening that all EU

institutions have incorporated in their strategies³⁴. Not only are lobbies able to observe performance of this complex institution, as argued in the theoretical framework, but they can even observe different dimensions: procedural and outcome-based performance.

Outcome-related performance

While interest groups care about procedural performance, they also evaluate the Commission on very tangible outcomes and results, which confirms – contrarily to citizens - that lobbies actually know what the Commission is doing:

“What we do usually has in many cases a direct economic impact on them [interest groups]. So of course they evaluate existing legislation in order to see whether it poses extra burden to them.” (Interviewee 16)

“So how does our proposal look like, or our competition rule decision is, you know, they [interest groups] will judge us on the results and how they think we have incorporated the input into our final product.” (Interviewee 18)

The complexity of policy is no obstacle for lobbies to be able to judge the Commission based on performance. Interest groups can observe and understand such complex issues and even compare it to the status quo. This confirms the idea that a comparison between current and past performance plays a crucial role for lobbies in evaluating the Commission.

Furthermore the abductive approach reveals another side of the outcome-based performance as point of comparison in lobbies’ evaluation processes: Policy preference plays an important role for outcome-based performance judgements. The central role of policy preference is not surprising, as interest groups are collections of actors that aim to shape policy (Dür & Mateo 2014, Beyers et al. 2015). Therefore, it

³⁴ See for example the Commission: https://ec.europa.eu/commission/presscorner/detail/en/IP_18_6739; or the ECB: <https://www.ecb.europa.eu/home/search/review/html/form.en.html>

is logical that they care about how well the Commission aligns with their policy preference, and that this ultimately shapes their views about the EC. Two very concrete examples of how interest groups use this form of outcome-related performance show the cases of maritime policy (Interviewee 3) and border security (Interviewee 16):

“[...] if you ask fishermen what they think about the Commission I don't think they will be very pleased. Because indeed in the past few years most of the decisions that have gained some visibility, have been negative for fishermen.”

“If it is in relation with borders, tourism organizations, air carriers, carriers,... their interest is to have something positive to help travellers and customers to cross the borders easily. [...] From their perspective what we do with border [...] is something positive. If you take groups being more focused on data privacy and data protection the perspective is different because each time we are implementing a system which is correcting individual data from citizens and processing these data they perceive it as an intrusion in your privacy. So the approach is more negative or more reserved. So it depends on this.”

These both instances are examples among others, which show that lobbies consider outcomes in relation to their policy preference when they evaluate the Commission. When the outcome of the Commission's actions coincides with lobbies' policy preference, they tend to evaluate it positively, while outcome farther away from their policy preference creates a negative evaluation. Lobbies by nature try to push outcomes towards their policy preferences and appreciate when the Commission aligns with those. Thus, the Commission's outcome-related performance plays a crucial role for lobbies, which have the understanding and information to judge based on performance.

The content analysis reveals a clear difference between interest groups' and citizens evaluation processes: While citizens evaluation processes are dependent on preconditions like understanding and information, these conditions are fully in place for interest groups. Not only do lobbies know *what* the Commission is doing (outcome-related performance) but they also know and can evaluate *how* the Commission is doing its job (procedural performance). This demonstrates the elevated understanding that lobbies have about the Commission and its policies as compared to ordinary citizens. Lobbies return automatically to performance-based evaluation processes because their knowledge allows for that and this evaluation process comes more natural to them. Interestingly, when asked about lobbies, civil servants never mention values as playing any role in their evaluation processes.

Evaluation processes of citizens versus interest groups

Drawing back to the research question, the qualitative content analysis reveals that citizens and interest groups' evaluation processes differ in practice.

Citizens' evaluation of the Commission is based on values but also on outcomes and results. However, the most crucial difference to lobbies' evaluation process is that citizens often lack the basic understanding of the Commission as an institution and the policies it conducts, which makes them often revert to simple value-based evaluations. In that sense understanding and information are necessary preconditions to make judgements based on result and outcomes for citizens. Also the tie to daily life helps citizens to evaluate the EC based on outcomes. On the contrary, the analysis has shown that the second evaluation process - based on values - works even when the preconditions of understanding and connection to daily life are not met. Evaluating based on values is thus more universally usable and can be done by any citizen, no matter the prior knowledge about the agency. The preconditions, which the inductive part of the method allowed to derive, explain the

core difference between citizens' and lobbies' evaluation processes: Understanding, information and connection to daily life. All of these conditions are crucial for citizens to be able to evaluate based on outcomes and results, while for lobbies, these preconditions are naturally in place.

More in line with theoretical predictions are interest groups' evaluation processes, which focus on performance: All respondents explain lobbies' evaluation processes based on one type of performance: Either procedural or outcome-based performance. Not only can lobbies judge the Commission's outcomes but also the procedures and actions it conducts along the way before policy is made.

In summary, the most crucial difference between citizens and lobbies evaluation process is not that performance-based evaluations are a prerogative to lobbies only, because they are also used by citizens, but rather that citizens also base their judgement on values, while lobbies emphasize on performance alone. Similar to the quantitative analysis also the qualitative analysis points in the direction that evaluation based on performance is fundamentally different from an evaluation based on values. While values are deep core beliefs that hardly change over time, performance is changing and adaptable depending on the situation and thus rather serves as means to an end. Empirically the analysis has shown that values and performance do matter for citizens, but performance only when certain preconditions of understanding and connection to daily life are met. For lobbies, performance alone plays the main role for in their evaluation processes.

To answer the research question: Do lobbies' and citizens' evaluation processes differ in practice? Yes. While the performative nature is more heavily pronounced for lobbies' evaluation, it is also found in citizens' evaluations. Values, however, are a reference point solely used by citizens and thus a special feature for the general public's evaluation processes. In that sense values play special role and are one specific thing that makes the two groups' ways of judging the Commission distinct.

Exploring legitimacy in the case of the Commission

Following the empirical investigation of evaluation processes, the following section will elaborate one important concept, that comes after the evaluation processes in the theoretical framework and has not been inspected at all by the quantitative analysis: Legitimacy. To draw back this concept's central role in the theoretical framework: The developed theory argues that the Commission depends heavily on legitimacy across the general public. It depends more so on the public's legitimacy than single-purpose agencies, because it is working in many policy domains, which needs compliance by everyone, and not only by interest groups (see chapter I, section 1.2 for a thorough explanation). In order to explore legitimacy in the context of the Commission the following analysis tries to answer the research question:

What are the building blocks of the Commission's legitimacy and are there problems of legitimacy?

Given that legitimacy has not been treated at all in the quantitative chapter, the qualitative content analysis is purely explorative, does not come with pre-liminary quantitative results and tries to describe the building blocks, problems and meaning of legitimacy in the case of the Commission. In order to explore the meaning of legitimacy in the EC empirically, civil servants have been asked what makes the European Commission legitimate and what are problems of legitimacy. Again, passages of text have been assigned to codes that have been partly developed ex ante from theory and partly ex post while reading through the transcripts as shown in the appendix (X. First and second order codes). This section tries to serve as purely descriptive elaboration of the Commission's legitimacy in practice and reveals two opposing thoughts within the Commission: full legitimacy versus in need for more legitimacy. What reasons speak for the former and what is needed for more legitimacy is summarized in figure 3.8 and elaborated in the subsequent paragraphs.

Opposite camps: Full versus no legitimacy

Generally, civil servants reveal two opposite stances when it comes to legitimacy of the Commission: On the one side they describe the Commission as *fully legitimate* and on the other side they acknowledge a need to make the agency *more legitimate*. One interesting finding, which adds to the literature of democratic deficit in the European Union (see Follesdal and Hix 2006 for a discussion) is that many respondents see the Commission as fully democratically legitimate and some even more so than any member state's government as the following two statements show:

“The president of the Commission has double legitimacy from the Council, [...] and then there is a vote in the Parliament. And I think you cannot have something more democratic than that.” (Interviewee 12)

The Commission is democratically legitimate even more than the member states.” (Interviewee 7)

In general, many parts of the interview script show that legitimacy of the Commission comes from the democratic process, whereas head of states and the European Parliament – both elected by citizens – conjointly decide on the president of the Commission. Civil servants who describe the EC as democratically legitimate, do not elaborate on any need to make it more legitimate and see its legitimacy as a given and fully in place. Civil servants draw back to the strong democratic process in place which combines domestic political choices and elections at European level, both directly exercised by citizens. Respondents explain that the democratic system of the European Union is what makes the Commission fully legitimate, but unfortunately the democratic process highly complex and thus often misunderstood or not observed at all by citizens. However, many civil servants, who also argue the Commission is fully legitimate, claim that legitimacy is based on the classical Weberian arguments of rational-legal authority rather than being democratically legitimate through elections and other political processes:

“The Commissions legitimacy comes from the treaties. It has been said in the treaties that, Europe needs to establish a governing, which has the power to make policies.” (Interviewee 1)

“[...]the Commission was entrusted as a technical, technocratic tasks, and therefore the Commission had its legitimacy from this technocratic independence, wisdom, knowledge, expertise[...].” (Interviewee 14)

“The Commission derives its legitimacy from EU primary law. Under the EU Treaties, it is given a particular role to exercise in the overall architecture of the Union, and it is recognized with the legitimate powers to do so.”
(Interviewee 27)

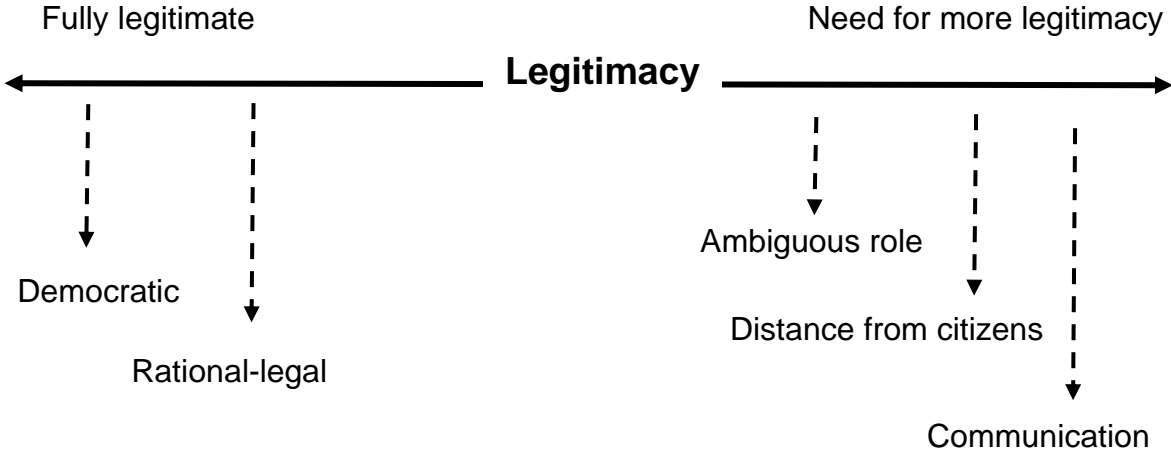
And others substantiate its legitimacy by expertise similar to Carpenter:

“Legitimacy is about the knowledge and expertise we have.” (Interviewee 3)

The interview script reveals that civil servants acknowledge that the heart and the strength of a legitimate bureaucracy like the Commission rely on legal and expertise-based accounts. It is unsurprising that bureaucrats not only acknowledge that the Weberian accounts of legitimacy play a crucial role in the Commission, but also do civil servants refer to these accounts when explaining *why* the Commission is fully legitimate.

In combination, the camp describing the Commission as fully legitimate, which is demonstrated on the left in figure 3.8, comes from either democratic and thus political legitimacy or the classical rational-legal authority through treaties and expertise.

Figure 3.8: Continuum of legitimacy and its determinants



Problems of legitimacy

On the contrary to “being fully legitimate” there is the second opinion among civil servants, which argues that more legitimacy is needed. Under this opinion fall three reasons of why legitimacy is lacking: The ambiguous role of the Commission, its distance from citizens and its communication.

First, when referring to the ambiguous role of the bureaucracy, civil servants draw on the need for better accountability and a clearer understanding of who is responsible, as interviewee 1 mentions comprehensibly:

“So, there are misunderstandings of the roles of the different institutions. And I think this than undermines in the eyes of the people the legitimacy of the Commission.”

Frequently bureaucrats refer to the ambiguous role as resulting in blame-shifting by member states, which is as another problem to the EC’s legitimacy as interviewee 3 describes it:

“And also, the member states are using that really often to say: “it is the Commission and not us”. So, these institutions give the impression that we are taking decisions, and this is a problem because we're not elected.”

Respondents explain that the ambiguous role is a problem for the Commission because it can be blamed for things it has no control over – whether these things are in the end coming from member states or other EU institutions. This lack of a clear role and accountability, which the Commission experiences in the eyes of citizens, seems to harm its legitimacy, because other political actors use it to their advantage and shift the blame to the Commission. While the problem of blame-shifting has been frequently discussed in political science especially in principal-agent problems, it is interesting to see that civil servants do also report these problems in practice as one major challenge of the bureaucracy.

Second, being far away from citizens is another major problem of legitimacy. Interviewees report that relationships with citizens should be managed better to increase legitimacy, as the following answers demonstrate:

“I think one thing is that we have to come closer. We have to come closer to the citizens. [...] there is a lot of effort that has to be done, effort as in terms of reaching out to citizens.” (Interviewee 9)

“But about making the Commission more credible in the eyes of Citizens, this will be the new task of the new EU commission. And there is a lot of effort that has to be done, efforts as in terms of reaching out to citizens.” (Interviewee 1)

This problem of legitimacy ties back to the pre-condition for citizens' evaluation mechanism: connection to daily life. In combination this shows that not only could a closer connection to citizens' daily life increase the chance of being evaluated but also could it increase legitimacy. The emphasis on 'reaching out' in order to increase legitimacy shows that civil servants are convinced that the Commission

does a proper job but needs to get this message across to the general population in order to be seen as legitimate.

Furthermore civil servants also describe being closer to citizens in form of concrete democratic participation as another potential solution for its lack of legitimacy:

“And when you look at what's Timmermans said on how we can involve civil society more, so attempts to try to loop in the different levels more, this is certainly some things that you can do. Then also outreach activities such as the Conference on the Future of Europe.” (Interviewee 5)

Especially mentioning the Conference on the Future of Europe, which is a major step by the current Commission to involve citizens in the decisions of the future design of the European Union, shows that being closer cannot only be done via policy but also via active engagement of citizens in ongoing processes. This is normally not typical for bureaucratic agencies but shows the political character that the Commission has gained over the past years.

Third, another problem for legitimacy is communications or as respondents often refer to “conveying the message”. How the Commission communicates its actions and the lack of understanding across society is a big problem for the legitimacy of the agency in civil servants’ opinion. However, what is new is that the EC’s lack of voice is by no means a choice:

“And I mean we're not allowed to say anything... often there are wrong articles in journals for example about Brexit and we were not allowed to defend or correct things, because it is considered to be political.” (Interviewee 8)

And often this unwanted absence of communication by the Commission itself can transform it into the scapegoat for unfavorable policy decisions through blame-shifting by other institutions, similar to the ambiguous role it holds:

“Because then for example the fisherman says: ‘oh the Commission cuts the fishing quota’, which is not true as it was actually the Council of Ministers. And

they take the decision and we only propose the legislation. And also, the member states are using that really often to say 'it is the Commission and not us.' (Interviewee 3)

"There has been also recognition that we are not really good in Showbiz, communication is not really good, [...] This is how the perception of the institutions and the Union is not really reflecting with happens in reality" (Interviewee 10)

"Then I think we have a lot to do to explain to citizens or to show our added value. And what we have tried in the past years with the corporate campaigns is exactly that. And we tried not to show that too technically, but to show concrete examples of SMEs for example that got help from the EU. It might be only a drop in the ocean. I mean the communication budget is 20 million euros for a campaign in all member states" (Interviewee 12)

Taking these viewpoints into consideration exemplifies how the thought of legitimacy in practice is a bi-polar continuum, where the Commission plays an absolute legitimate role on one end and where it is in need for more legitimacy on the other end. Furthermore, the emphasis on classical Weberian accounts of legitimacy seems to have been historically an important cornerstone of the Commission's legitimacy and does not seem to be fading. However, civil servants also acknowledge the Commission's need for more legitimacy. Communications, its ambiguous role, and distance to citizens are three major problems that make the EC less legitimate. Simultaneously however, these three problems also offer opportunities to develop and enhance the Commission's legitimacy according to civil servants.

Summary: Qualitative analyses

Civil servants, who interact with citizens as well as with interest groups and represent the corpus of the European Commission, are a precious source when investigating influences and dynamics determining the Commissions' evaluation and legitimacy.

The first part of the qualitative analysis looked precisely at the evaluation process of citizens versus interest groups to investigate how these differ in practice, which the quantitative analysis could not satisfactorily answer. The empirical evidence shows while interest groups rely procedural and outcome-based performance, citizens care about performance, but only when the pre-conditions of understanding and connection to daily life are given. Other than that, citizens also care about values in their respective evaluation processes, as hypothesized in theory. In combination the results of the abductive approach shed more light on evaluation processes and demonstrate that these are distinct for citizens and interest groups but overlap when it comes to the role of performance. The new insights, which were not apparent from theory nor from the quantitative part of the mixed methods, are the pre-conditions understanding and connection to daily life, which allow citizens to evaluate the Commission based on performance. That way, the qualitative approach draws attention to new determinants, which could be used for future research to further investigate the evaluation process of the Commission. In line with the theory developed in chapter I, the qualitative analysis supports the idea that interest groups care about performance and emphasize this evaluation most.

The second block of the analysis investigated legitimacy, a crucial concept in the theoretical framework, which was not explored before in the thesis. It scrutinized the concept's meaning for this special multi-purpose agency. The exploratory content analysis demonstrated that within the Commission legitimacy is seen on a bi-polar continuum, where the Commission plays an absolute legitimate role on one end and where it is in need for more legitimacy on the other end. While many respondents

refer to it as democratic and rational-legal legitimate, the other side of the spectrum acknowledges legitimacy problems. These include communications, the Commission's ambiguous role and its distance from citizens. In combination these findings explain the meaning of legitimacy in the case of the EC and show that similar to the theoretical framework, citizens play the central role in determining the Commission's legitimacy.

However, the results of the qualitative method must be evaluated against the study's limitations:

First, the Commission is not a classic regulatory agency like the FDA and other often analyzed bureaucracies and thus the external validity of this analysis is low and the results rather case specific. Second, even though the given sample size seems to be "robust as it captures enough variability" (Nowell & Albrecht 2018) the number of interviews is certainly a very limited sample. With reference to the method, it can be said that the abductive theorization has realized its main objective, which lies in adding new ideas to existing theory and results (Richardson & Kramer 2006) leveraged on the advantage that qualitative methods offer, such as developing new constructs and enriching results (Nowell & Albrecht 2018). However, a limitation of the method represents the level of replicability of the abductive theorization process. Unlike deduction, where rules are laid down in advance and therefore the coding process made easily replicable (Mayring 2014), the abductive coding-process used in this chapter is more difficult to replicate because it heavily depends on coders' perceptions and pre-existing knowledge. Helpful to address this issue, but nonetheless not problem-solving, are the tables with passages and first-order codes in the appendix (X. First and second order codes), which should help to facilitate the researchers' interpretations for others (Cornelissen & Durand 2014, Welch et al. 2011).

Conclusions

The European Commission is a multi-purpose bureaucracy embedded in a complex multi-level system, which makes it very distinct from conventionally studied bureaucratic agencies in public administration. Especially in the realms of reputation research, which predominantly focuses on single-purpose agencies that experience lower public awareness and media coverage, the Commission stands out. Because of the increasing number of policy domains, it has started to work in over time, it continuously has created more media coverage and thus more salience of the actions it performs. Therefore, it has become subject to more monitoring by ordinary citizens. This augmented level of politicization is the most exacerbated difference between the Commission and other bureaucratic agencies and gives reason to distinguish it from others. Simultaneously its nature of being an unelected, expertise-based, and technical institution shows that it is also in many ways similar and still a bureaucracy at heart.

The dissertation has investigated the meaning of reputation for this multi-purpose and politicized public administration and added to the literature in the following ways: First, theoretically it expanded the literature by introducing a theoretical framework, which emphasized on the difference between single- and multi-purpose agencies, the evaluation mechanisms used by citizens and interest groups and finally the theoretical distinction between trust and reputation. It showed that trust and reputation are close but yet distinct concepts, which are competing mechanisms creating legitimacy. It added to the literature by offering a theoretical distinction between trust and reputation, which often are used in close proximity or interchangeably. The fine but significant difference between trust and reputation – based on values and performance respectively - laid the ground for further investigations in this dissertation and built the core construct on which all subsequent

analysis was based on. The first chapter has shown that reputation can be explained as an evaluation of a public agency, which is generated by interest groups based on performance. Trust on the other hand can be described as an evaluation by ordinary citizens based on values and deep core beliefs. While lobbies and interest groups can typically observe performance of such complex agencies and thus create reputation, citizens normally compare institutions to their normative expectations and thus create trust. Reputation and trust in combination can then be called two competing mechanisms, which create legitimacy of public agencies. While multi-purpose agencies like the Commission operate in many policy domains and thus are more scrutinized by the public, they should rely more on trust and ordinary citizens' perceptions. On the other hand, single-purpose agencies like the FDA, which operate in few policy domains and are thus less observed by the general population, should rely more on performance-based evaluations by interest groups. Even though trust and reputation create legitimacy, the theoretical framework argued that legitimacy based on trust is more important for the Commission, because it needs compliance by ordinary citizens and not only by affected audiences such as big business or interest groups. Therefore, the dissertation argues that it is not reputation alone that creates legitimacy, as argued in the reputation literature, but rather the combination with trust from ordinary citizens that creates legitimacy in the case of multi-purpose agencies.

Second, the dissertation quantitatively investigated the media-proportionality hypothesis, which showed that working in an increasing number of policy domains over time significantly increases media coverage of the Commission. The time series analysis pointed in the direction that media can – even though conventionally rarely used – also be used as a dependent variable, which mirrors actions and policy decisions of public agencies, rather than being the agenda setter.

Third, and related to media coverage, it quantitatively confirmed the group activity hypotheses: Media coverage decreases mobilization (anticipatory lobbying action) of general interest groups but increases their success (substantive lobbying action) and has the inverse effect for special interest groups. These results confirm the larger argument of the dissertation, which claims that the Commission, which experiences more media coverage, should be more influenced by ordinary citizens than interest groups.

Fourth, it investigated the crucial difference between trust and reputation by using mixed methods. The quantitative part pointed in the direction of a distinction between trust and reputation empirically based on their evaluation mechanisms. It showed that an alignment of values has a significant positive effect on trust, while better performance positively affects reputation. Even though trust and reputation have not been measured in the same year, the application of a proxy for performance – GDP growth – supports the theoretical claim that reputation is based on performance. On the contrary GDP growth has no effect on trust, as hypothesized. Even though values also play a role for reputation and not only for trust, the quantitative analysis indicated that performance is an explanatory variable unique to reputation only. The absence of a significant effect of performance on trust suggests that – while trust and reputation are related – they are empirically distinct. However, this fine-grained distinction, and whether citizens use value-based evaluations and interest groups performance-based evaluations could not fully be revealed by the quantitative analysis alone. Therefore, the qualitative method followed to investigate the evaluation mechanisms empirically. This section revealed new findings by showing that citizens' evaluation processes are either value- or performance-based depending on two pre-conditions: information and connection to daily life. Interest groups on the contrary, evaluate the Commission purely based on performance (procedural and outcome-related). As predicted by the theoretical framework, value-based evaluation

(trust) is overly pronounced for citizens, while performance-based judgements are the go-to mechanism for lobbies.

Finally, the qualitative part of the MMs explored the meaning of legitimacy in the eyes of the European Commission's staff. Abductive theorization demonstrated that the body of civil servants has two opposite opinions about its legitimacy: One claiming it to be fully legitimate based on democratic and rational-legal legitimacy; and one claiming that there are problems of legitimacy such as its ambiguous role, communication and distance to citizens.

In combination the mixed methods allowed to answer the research questions introduced in the beginning of the dissertation: *Does working in more policy domains increase media coverage? How are interest groups and the general public affected by enhanced media coverage? Is reputation based on performance and trust based on values?*

The dissertation contributed to the reputation literature in PA by offering novel theoretical and empirical insights, which made not only conceptualizations clearer but also should give impetus for future research of reputation and trust in the environment of multi-purpose agencies. With reference to recent work by Bustos (2021), this dissertation speaks to the current state of the literature in five ways: First, it answers the call for more research about "the audiences' side" and highlights the pivotal role of ordinary citizens as audience of any bureaucracy working in a democratic system. Second, it focusses on cognitive aspects of audiences by drawing on evaluation mechanisms behind trust and reputation. Thirdly, this work focusses on perceptions and how they create evaluations, which have been understudied in the literature. Fourth, it expands the geographical focus of reputation studies from the United States, Israel, and the Nordic regions to the unique case of the multi-national system of the European Union. Finally, it addresses the problem that "scholars have paid more attention to the 'facts of performance' and neglected

other important issues” (Bustos 2021, p.741), by introducing trust and showcasing its importance for politicized bureaucratic agencies like the European Commission.

When comparing the developed theory and empirical evidence the takeaway is threefold: First, as argued in the theoretical framework, bureaucratic agencies in a complex democratic system such as the European Union have to “*be in line with expectations and preferences of most relevant audiences*” (Rimkute 2020) and in the case of the Commission these audiences should not only be interest groups but especially the general public. Secondly, in order to secure long-term legitimacy, values, which change hardly over time, have to be considered and aligned with, especially in the case of more politicized institutions like the EC. And thirdly, output legitimacy is still a necessary but certainly not sufficient condition for legitimacy in the extraordinary case of the European Commission.

The dissertation offered a comprehensive picture of different concepts surrounding reputation, trust and legitimacy of the Commission and has led from the initial step of normative theory development in chapter I to a positive stance in chapter III. The mixed methods design has shown that the combination of quantitative and qualitative methods can enrich theoretical insights and address data limitations at the same time. In the case of this dissertation, it has been shown that the quantitative method alone would be insufficient to answer the research questions due to data limitations, where the qualitative method came in. However, abductive thematic analysis did not limit the qualitative method to addressing the quantitative shortcoming only but allowed further theory development, which the theoretical chapter and the quantitative analysis alone would have overlooked. The mixed method design was thus a fitting one for such a complex and theory-rich topic as the Commission’s trust and reputation.

The focus on norms and values in this work, which accompanies every chapter of the dissertation, is not only relevant within the realm of current political discussions but

also significant in the academic discourse surrounding public administration. On the one hand norms and values are momentous of current political debates, which are more and more tied to value-based arguments particularly within the European Union. On the other hand, values are the main pillars, which connect Public Administration to Political Science. In fact when looking at the contemporaneous state of Public Administration one can argue that values make up one of the two larger questions in the field, which still seem to be unsolved: On the one hand these are questions regarding normative values and on the other hand it is PA's tie to Political Science, which in conjunction formulate the big present-day questions of the discipline. It is the former (normative values), which connects the latter (political science) with Public Administration. Even though normative values are not consistent across systems, they share some fundamental commonalities across Western democracies, and they are the common denominator of politics and public administration within any single system. Public administrations in any system are inherently linked to the system's political arrangement through a principal-agent relationship. Therefore, any public agency cannot be looked at in isolation from its political context and without regards to the democratic values, which are present in the structure it operates in. In this dissertation, which looks at a special case of bureaucratic agency - the European Commission - through the lens of public administration, values serve as determinants for legitimacy of the bureaucracy under study, which reflects their importance in the discipline. Continuous development of our democracies and societies should continue to increase the public's knowledge about public agencies and exacerbate values' importance when it comes to agencies' legitimacies. From this viewpoint, the dissertation situates itself in the emerging field of values' role in public administration and tries to address some fundamental questions around values, trust, and reputation. However, there is still much work to

be done to disentangle the role of values for public agencies fully, which lies outside of this work's objectives but offers an interesting avenue for future research.

Limitations

Besides the novel theoretical and empirical insights, this study comes with a number of limitations, which have to be considered when looking at the results and conclusions.

First, while there is space to distinguish trust and reputation theoretically, empirical results rather point in the direction to support the argument that these concepts are distinct. However, there is room for improvement in measuring the variables and in comparing them more directly. As Eurobarometer data does not measure the concepts in the same year, using an objective proxy for performance (GDP growth) helps to show the empirical distinction between trust and reputation. Future research, however, should emphasize on more precise measures and a more clear-cut, unambiguous distinction of the concepts. The qualitative analysis has tried to make the distinctions between these concepts clearer. However, while Eurobarometer data only looks at citizens, the interview data only captures the view of civil servants as opposed to actually asking citizens, which is another limitation. Also, none of the data directly measures interest groups' evaluation processes, which also suggests that new data in form of surveys or experiments could be a solution to test their difference in practice better and is certainly an interesting avenue for future research.

Second, the measure of media coverage in form of a simple frequency measurement does not account for semantics within messages by the media. This could hide some effects by media on lobbies' and citizens' mobilization, which could be dependent on the content of the message. Owing to the fact that media coverage served rather as "setting the scene" than playing the main role in this work, a simple frequency measure seemed sufficient. Nonetheless, future research could scrutinize the

media's role more in depth by exploiting new techniques of text analysis and including semantics in the variable measurement.

Third, the fact that media's effect on lobbies and general interest groups only holds for regulations and not for directives could be further investigated. A look into the policy domains showed that this can be explained because regulations are more Europeanized and reach the end of the policy cycle in Brussels. Therefore, the effect of media on interest groups, who are working in Brussels and are interested in the outcome of the policy, only holds for regulations. However, the sample of policy domains is rather small to draw general conclusions. A larger sample and more data could also be useful for future research in this direction.

Fourth, all regression analyses – but especially for trust and reputation – include a limited number of variables and thus could be subject to omitted variable problems. This has been partly addressed for H_1 investigating policy domains and media coverage by using Granger causality and introducing population and number of members states, to show they do not influence media coverage. However, for the remaining hypotheses and their regression analyses the omitted variable problem remains, and thus must be interpreted with caution.

Fifth, the European Commission is a special case and what reputation means for this highly politicized public agency might not hold for other similar bureaucracies. Therefore, the study is really case-specific, lacks external validity and in order to project its findings to other multi-purpose agencies, the unique case of the Commission must be kept in mind.

Despite these limitations, this research has introduced a novelty by dragging trust into the bigger picture of the reputation literature instead of treating it as one part of moral reputation. Not only is this distinction theoretically important but also practically significant: If trust and reputation are indeed distinct, public agencies might have to rethink which one of these evaluation outcomes is more important for them. Scholars

have shown that whether trust - based on values - or reputation - based on performance - matters more for a bureaucratic agency depends on its institutional logic (Berg & Dahl 2019, Krause & Douglas 2005). I argue that the same reasoning holds for the European Commission, which is the overall argument in a nutshell: While initially its institutional character was mainly technical and thus dependent on performance-based reputation, it has shifted to a multi-purpose, more politicized agency with higher dependence on values and trust.

Appendix

I. LexisNexis code

Code used in LexisNexis do retrieve the data for media coverage:

(Commissione W/1 Europea) OR (Comisión W/1 Europea) OR (European W/1 Commission) OR (Europäische W/1 Kommission) OR (Commission W/1 européenne) OR (Europska W/1 komisija) OR (Evropská W/1 komise) OR Europa-Kommissionen OR (Europese W/1 Commissie) OR (Euroopa W/1 Komisjon) OR (Euroopan W/1 komissio) OR (Európai W/1 Bizottság) OR (An W/1 Coimisiún W/1 Eorpach) OR (Europos W/1 Komisija) OR (Eiropas W/1 Komisija) OR (Kummissjoni W/1 Ewropea) OR (Komisja W/1 Europejska) OR (Comissão W/1 Europeia) OR (Comisia W/1 Europeană) OR (Európska W/1 komisia) OR (Evropska W/1 komisija) OR (Europeiska W/1 kommissionen)

II. Readership statistics for each newspaper used to measure media coverage

Frankfurter Allgemeine Zeitung:

- Readership: 760.000 (2014)
- Source: <https://www.statista.com/statistics/1114896/frankfurter-allgemeine-zeitung-reach-in-germany/>
- FAZ is the second largest daily newspaper (largest daily newspaper: Süddeutsche Zeitung)

La Repubblica:

- Readership: 581.000 (2003)
- Source: <https://www.statista.com/statistics/536772/number-of-copies-in-circulation-and-sold-of-la-repubblica-italy/>
- La Repubblica is the second largest daily newspaper (largest daily newspaper: Corriere della Sera)

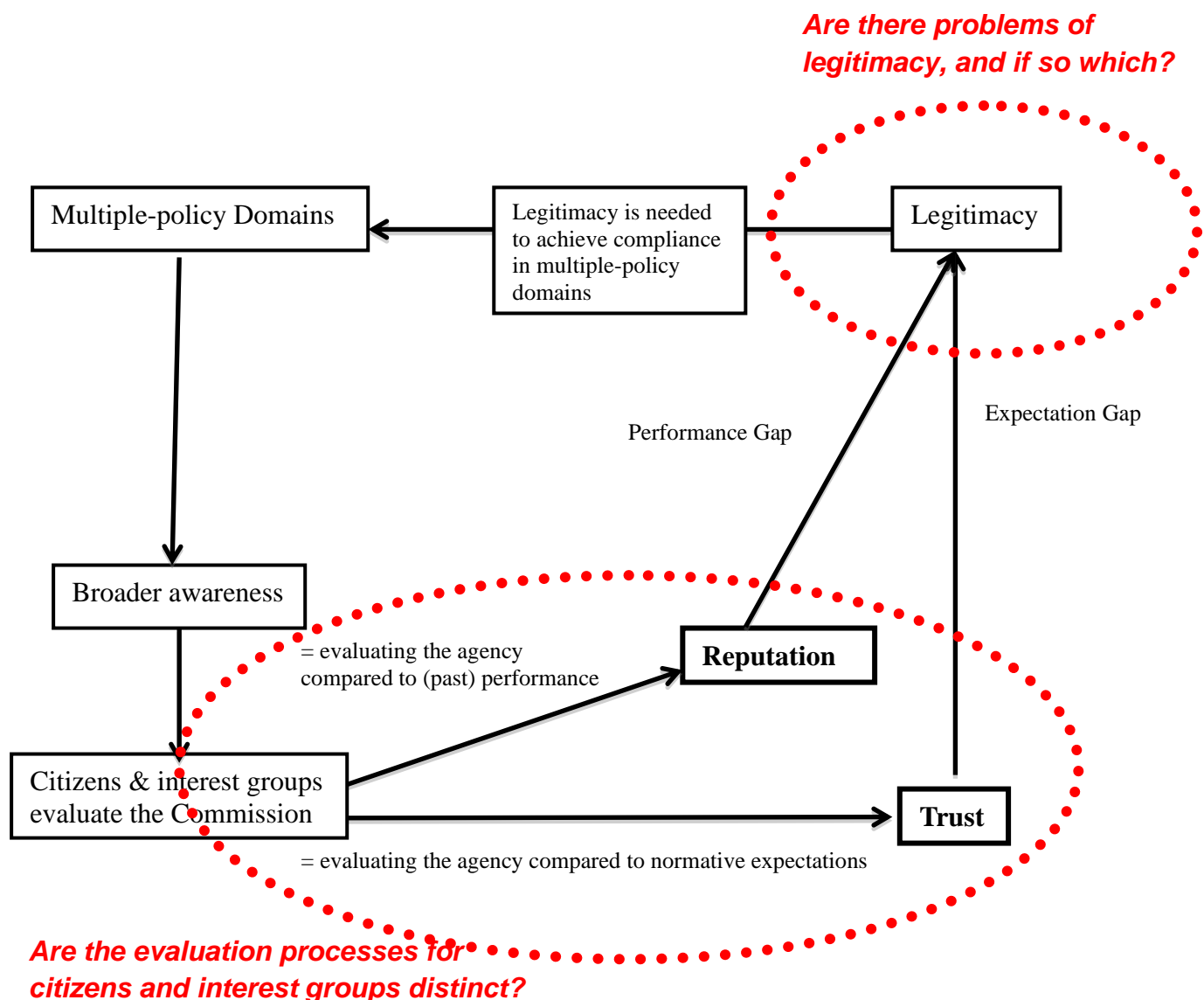
Les Echos:

- Readership: 678.000
- Source: <https://www.internationalmediasales.net/international/portfolio/detail/les-echos/>
- Les Echos is the second largest daily newspaper (first largest daily newspaper: La Croix)

ABC:

- Readership: 291.950
- Source: <http://www.pressreference.com/Sa-Sw/Spain.html>
- ABC is the largest daily Spanish newspaper

III. Deriving research questions for the qualitative analysis from the theoretical framework



IV. Full interview script

(for interviews conducted in 2019-2020)

Interview Script (2019/2020)

Questions:

1. Thinking about ordinary citizens on the one hand and interest groups, for example lobbies or big business on the other hand: Who influences the Commission's policies more in your opinion?
Or does this depend on the type of policy?
2. If you think about the new Von Der Leyen Commission: Do you think the values at the heart of this administration influence whether people trust or do not trust the Commission?
3. Now let's talk about the DG/executive agency you are working in. Do you think your DG has a different reputation than the Commission as a whole?
Why or why not?
Could you relate this to citizens and lobbies?
4. Now changing the topic a little: What do you think matters more: The values the Commission holds or how it performs? Let me give you an example for each.
Values: fundamental opinions about issues like immigration, environment, rule of law...
Performance: outcome of actions like how well it protects consumers, how it deals with immigration,...
Would you think this depends on the audience? (interest groups or civil society)
5. People often talk about the legitimacy of governments or public agencies. What is, in your opinion, the Commission's *legitimacy*?
And what can the Commission do to increase legitimacy in society in the future?

V. Reduced interview script

(for follow-up interviews conducted in 2021)

Reduced interview script (2021):

Questions:

1. Now, consider interest groups, for example lobbies, big companies, associations, or any other form of organized interest that tries to influence policies. Do you think the daily work performance of the Commission matters to interest groups?
2. Now comparing citizens and organized interest: Who of these groups would you say is more influential?
 - Do you believe this depends on the subject?
 - If so, how? Can you elaborate on this?
3. Now about organized interest: On what premises or criteria do they evaluate the Commission?
4. Now let's talk about the DG/executive agency you are working in. Would you consider the reputation of your DG to be different than the reputation of the Commission in general? ? -*compare process and outcomes*
 - And if so in what respect?

VI. Variables and years of measurement in the Eurobarometer

Year of measurement	1987	1988/ Autum	1990/ Autum	1991/ Autum	1993/ Autum	199	200	2001/ Sprin	2001/ Autum	200
Eurobarometer	280	300	340	360	400	9	0	g	n	2
<i>Trust</i>						x	x	x	x	x
<i>Reputation</i>	x	x	x	x	x					
<i>EU membership</i>	x	x	x	x	x	x	x	x	x	x
<i>Benefit</i>	x	x	x	x	x	x	x	x	x	x
<i>Regret</i>	x	x	x	x	x	x	x	x	x	x
<i>EU government</i>	x	x	x	x	x					
<i>Unification</i>	x	x	x	x	x					
<i>Performance</i>	x	x	x	x	x					
<i>Education</i>	x	x	x	x	x	x	x	x	x	x
<i>Political orientation</i>	x	x	x	x	x	x	x	x	x	x
<i>Sex</i>	x	x	x	x	x	x	x	x	x	x
<i>Age</i>	x	x	x	x	x	x	x	x	x	x

Note. Some variables have been measured before 1987, but as the dependent variable reputation has only started being measured in 1987, this year is the first year of reference for the table.

VII. Correlation matrix: Trust

Correlation matrix: Trust and normative expectations (values)

	Trust	EU membership	Benefit	Regret	Age	Sex	Education	Political orientation
Trust	1							
EU membership	0.49***	1						
Benefit	0.45***	0.68***	1					
Regret	0.48***	0.69***	0.6***	1				
Age	0.05***	0.09***	0.11***	0.07***	1			
Sex	-0.02**	0.04***	0.03***	0.05***	0.04***	1		
Education	-0.08***	-0.13***	0.14***	0.12***	0.41***	-0.01	1	
Political orientation	-0.02**	-0.01	-0.02*	-0.01	0.08***	-0.03**	-0.01*	1

Notes. N = 15 998. ***p ≤ 0.01, **p ≤ 0.05, *p ≤ 0.10.

VIII. Correlation matrix: Reputation

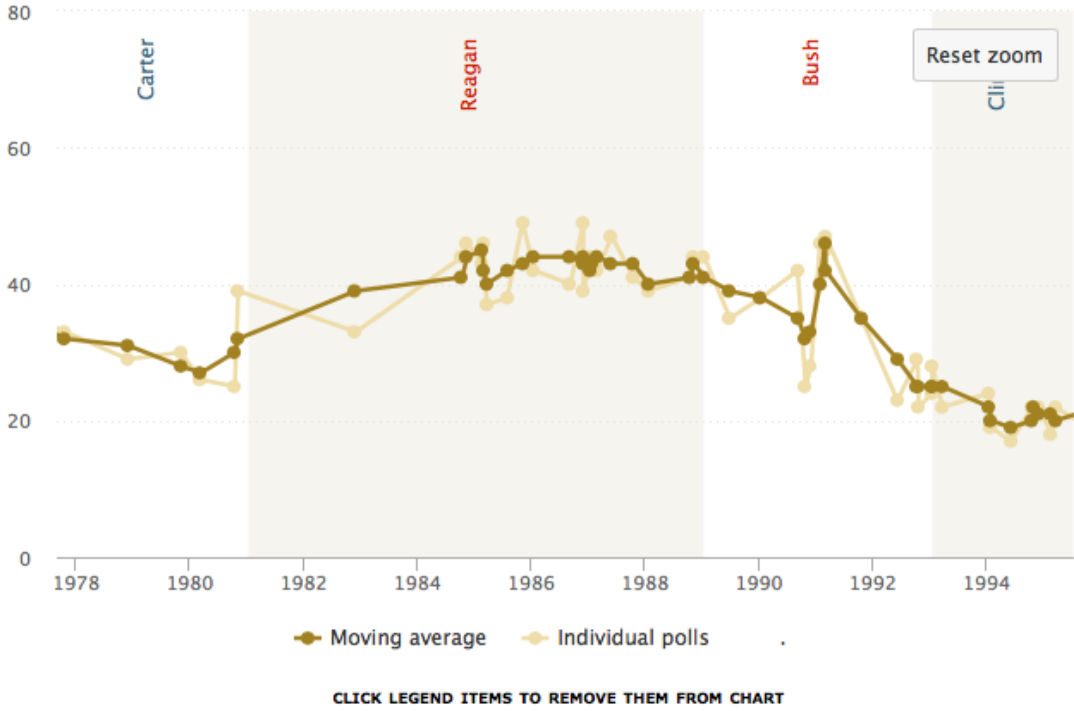
Correlation matrix: Reputation

	Reputati on	Performa nce	Unificati on	EU government	EU Membership	Bene fit	Regr et	Age	Sex	Educati on	Political orientation
Reputation	1										
Performance	0.12***	1									
Unification	0.348***	0.13***	1								
European government	0.3***	0.06***	0.43***	1							
EU Membership	0.35***	0.15***	0.55***	0.39***	1						
Benefit	0.31***	0.15***	0.40***	0.28***	0.57***	1					
Regret	0.34***	0.13***	0.56***	0.41***	0.68***	0.53* **	1				
Age	0.03***	0.04***	-0.01***	0.01	0.04***	0.05* **	0.01	1			
Sex	-0.02***	0.04***	0.06***	0.01*	0.03***	0.02	0.04* **	0.04* **	1		
Education	0.03***	-0.02***	-0.02***	0.05***	-0.07***	0.07* **	0.07* **	0.35* **	0.03* **	1	
Political orientation	-0.06***	-0.11***	-0.04***	0.02***	-0.08***	0.09* **	0.06* **	0.08* **	0.00* **	-0.01***	1

Notes. N = 18 380. ***p ≤ 0.01, **p ≤ 0.05, *p ≤ 0.10.

IX. Pew Research Centre Data during the Reagan Period

% who trust the govt in Washington always or most of the time



PEW RESEARCH CENTER

Source: <https://www.people-press.org/2019/04/11/public-trust-in-government-1958-2019/>

X. First and second order codes

Citizens' evaluation process

Evaluation process based on

Examples - interview passages

Understanding and information

It's always the same it's a matter of transparency and a matter of information.

When it comes to the policies that we make in, for example, genetically modified food, you still see a strong scepticism among Europeans when it comes to these new technologies. Therefore, I really think it depends on the topic and whether people know about it, and whether people are informed on such topics. If they are afraid, as they are with genetically modified food, they tend to take a more negative outlook on the work of our DG.

I would say the reputation of my DG To the citizen is very good because it has... It is clear and it is related to things that they understand Like education culture youth, sports.

Values

Thinking about the commissioners especially for those people who have values in the social-democratic corner the commission is often believed to be a very liberal entity which wants to promote a liberal, market-oriented, full speed entity, which they believe is not in the interest of the people.

What we could see in this last period, 2016 to 2019 was people really started talking about values. Interestingly. I did not expect that. Before that was not the case so much. Before it was really about policy and about listen we are suffering and what can you do in order to help?

Since the last 3 years what we could indeed see is on the one hand people started to reflect: What does it mean for us? For us as EU? And what does BREXIT mean? What does it mean that you have governments that are in breach of classical principles of European universal values, such as democracy and rule of law? And people were really concerned about that. And that not only in Hungary and Poland but also in France and Italy and Slovenia. So they came up with that.

People I think perceive that this European project is based on values. And in some countries, especially France and Germany, the peace element is still very strong. And people tell us peace is one of the key ingredients of the European project. So I think yes, people have this perception that Europe is based on values.

Outcomes

They simply don't care. So I think it is very, very difficult to communicate what we are doing and you can only do that by showing results. Like this is a tunnel that works. Or this is the speed limit that brings down emissions.

This Commission will be judged by what it delivers.

It is very important that the Commission shows that the work that we do collectively has a real impact. And we have to point to specific examples, and there are many, because otherwise you end up with stupid stories, like the one with the size of cucumbers.

Now of course this is not enough to announce the priorities, we need also to deliver results. And that's the key thing. But I think its important for this Commission to present the big packages of guidelines in the beginning like the green deal to give orientation and then people will judge us in a few years based on if we manage to deliver on that.

Connection to daily life

But the ones that Are more problematic I really the ones that Really work at the core of the people's life.. I am thinking of DG Mare, fisheries, DG AGR1 in agriculture Lots of challenges in the recent years with unemployment with segments of the industry who had to close. And very often Brussels seen as being responsible for that.

Alright, so I had the privilege in the past to work on the roaming regulation. So that is something very visible, very European and people saw a lot of benefits.

Our DG is very strong because we have very strong programs. Like Erasmus, Plus European solidarity Corps or discover EU, which I am working on, which is the interrail pass for 18-year olds. This is an action by the parliament, well we are a three-year pilot project and as of next year it will be integrated under Erasmus as a mobility for 18 years olds. So that means our Digi has a very good reputation outside Because if I go somewhere and people ask me on the street or my family is asking me What do you do every day and I reply I work for Erasmus Plus Everybody will say ah cool. Because it is something concrete that they can touch.

Interest groups' evaluation process

Evaluation process based on

Examples - interview passages

Listening/ responsiveness

I would hope that in general they would evaluate the Commission on the basis of, of being approachable, or at least listening to their concerns.

The only common criteria I can think of as the Commission, is to listen, and to listen somehow balanced.

Certainly for interest groups it is important to have the, the feeling that they, that we are listening to them. Okay we are listening. This is very important with the civil society, for example the different NGOs, but also with the local authorities, associations of local authorities in general. They are asking always for the support of the European Commission.

But they like it when of course it listens to them they don't like it when of course it doesn't listen to them.

Outcome

So we have introduced quotas and so on which is perceived very negatively by those fishermen.

What we do usually has in many cases a direct economic impact on them, paying taxes, paying more, or paying less taxes. So of course they evaluate existing legislation in order to see whether it poses extra burden to them as compared to other tax jurisdictions.

And then I would say, the third thing on which we could be evaluated is on the output.

So what is how does our proposal look like or our competition rule decision is, you know, they will judge us on the results and how they think we have incorporated the input into our final product.

Their interest

On the one side the fishermen and on the other side the environmental NGOs- and none of them is happy with what we're doing because we are in the middle. So on our specific issue I don't think there are many people that are actually positive about the DG and what we are doing.

If it is in relation with boarder, tourism organizations, air carriers, carriers, their interest is also to have something positive to help them.. travellers and customers to cross easily the boarder. And to have a simple travel and so on. From their perspective what we do with boarder control facilitation and so on, it is something positive. If you take people being more focused on data privacy and data protection the perspective is different, because each time we are implementing a system which is correcting individual data from citizens and processing these data they perceive it as an intrusion in your privacy. So the approach is more negative or more reserved. So it depends on this.

For instance, when the Commission tried to have this label ABCDE, you know the health label. There was this large Italian group Ferrero who tried to oppose it. Because they have products that don't really respond to the highest standards health-quality wise. And they really tried hard to oppose it.

Whenever the Commission does something for the motor industry. You have all sorts of people claiming that it's going to kill the European industry, whereas you have other people who say, 'thank God we do something to decrease pollution'.

different stakeholder groups will have different judgments of the Commission depending on how it affects their interests.

First-order codes

Examples

Legitimacy based rational-legal authority

Legitimacy is about the knowledge and expertise we have.

I think at the beginning of the European project the Commission was entrusted as a technical, technocratic tasks, and therefore the Commission had its legitimacy from this technocratic independence, wisdom, knowledge, expertise

The Construction of the European Union has more legitimation than a democratic legitimation. It has more legitimation because it is a project of peace.

So of course the legitimacy, the formal legitimacy, comes from the treaties so for me that is key.

It is legally legitimate, because governments get together and they sign the treaty that forms the European Union.

Being closer to citizens

I think one thing is that we have to come closer. We have to come closer to the citizens.

[...]how we can involve Civil Society more, so attempts to try to loop in the different levels more, this is certainly some things that you can do. Then also outreach activities such as the conference on the future of Europe

Ambiguous role

And I think it is this role that we have to clarify who or what we are.

And I think the better you understand how the whole thing works the more you can associate yourself with the system.

[...] issues with efficiency and getting the funds actually on the ground.

And you know this it is always the same if something goes well then the minister goes back to his member state and says do you see what I did. And if something goes wrong he says do you see what Brussels has done? And this is really killing us.

And when they come home they say it is their idea and if the compromise is not completely satisfying then it is the fault of the Commission. And I think we have to be much more active in battling this through communication, through political communication as well.

Communication

And I mean we're not allowed to say anything... often there are wrong articles in journals for example about BREXIT... And we were not allowed to defend or correct things, because it is considered to be political.

I think the Commission can only get credibility outside if they stand up. If we are more clear about what we are doing and also being more clear about how we are blocked by the member states.

We need to become more legitimate? I don't know. Because at the end what's the role of the Commission? I think what the

No essential need for legitimacy

Commission does is it does its job. So how far we really need to be in contact directly with citizens and how important that is I am not a hundred percent sure.

XI. Example for the data structure

First order concepts	Second order themes	Aggregate dimension
<ul style="list-style-type: none"> • transparency and a matter of information • it depends whether people know about it (the topic) • things that they understand 	Understanding and information	Pre-conditions for evaluating
<ul style="list-style-type: none"> • policy at the core of the people's life • roaming regulation, something very visible • Erasmus Plus, something concrete that they can touch 	Connection to daily life	
<ul style="list-style-type: none"> • people really started talking about values • People perceive that this European project is based on values • European project is based on values 	Values	Evaluation mechanisms
<ul style="list-style-type: none"> • showing results like this is a tunnel that works • the Commission will be judged by what it delivers • Commission shows that the work that we do collectively has a real impact 	Outcomes	

XII. Research protocol

Project summary

The research project “European Commission expert interviews” aims to disentangle trust and reputation and the concepts’ meanings in the special case of the European Commission. More precisely it develops a theoretical framework from which hypotheses emanate, which will be tested ultimately using mixed methods. The qualitative part asks whether the reputation of the European Commission in the eyes of interest groups is driven by performance, and whether its reputation with citizens is driven by values.

General information

- Name of the project: “European Commission expert interviews” (for the dissertation ‘Trust and reputation of the European Commission)
- Name and e-mail of the researcher: Eva-Maria Schwarz,
evamaria.schwarz@phd.unibocconi.it

Study goals and objectives

Goals of the research include the development of a better understanding of the European Commission, its reputation and trust across various audiences and advancing the literature in reputation research in Public Administration.

Study design & Method

The study uses mixed methods, whereas the quantitative method precedes the qualitative method. The quantitative method uses time-series regression analysis and cross-section regression analysis based on publicly available data. The qualitative method uses semi-structured expert interviews with civil servants, which are anonymized and analysed using content analysis.

Safety considerations

The safety of research participants will be ensured by anonymizing the interview data and conducting the interviews via video call or in person.

Also, all audio data will – once transcribed – deleted and only anonymized transcribed data will be saved on a safe device with access only of the researcher.

Expected outcomes of the study

The study will contribute to advancement of knowledge in public administration and reputational studies especially in the context of the European Union.

Interview Script

Interview script for expert interviews

Project: European Commission expert interviews

Topic: *Reputation and Trust of the European Commission*

Interviewees: *Officials working in the EC*

Interviewer: *Eva-Maria Pirker (Schwarz), PhD candidate*

Approximate time: *15-30 min.*

Main questions are marked with numbers;

Potential follow-up questions are marked with a dot:

Interview:

Interviewer: Good evening/morning and thank you for the opportunity to interview you today. As introduced in my email a couple of days ago, this interview will be based on your opinions about some aspects of the European Commission, with the target to shed more light on this institution. Henceforth, the goal is not to understand civil servants themselves better, but rather the institution and opinions about it. Of course, all material will be anonymized and held confidentially.

Please feel free to elaborate on topics and answer the questions as long or short as you may wish or of course not answer and skip questions. Do you have questions about the procedure, my research or other? If everything is clear for you and you have no further questions, we can proceed to the questions now.

Block 1: *Performance versus normative values*

1. When you think about what the Commission does, for example the administrative or regulatory tasks it undertakes on a daily basis, or simply the Commission's way of working and performing as an administration. Do you think that this – let's call it the Commission's general performance - matters to ordinary citizens and shapes their view of the Commission?

- If so how?
 - Can you give me an example of why you think so?
2. Now, consider interest groups, for example lobbies, big companies, associations, or any other form of organized interest that tries to influence policies. Do you think the daily work performance of the Commission matters to interest groups?
 - Why or why not
 3. Now comparing citizens and organized interest: Who of these groups would you say is more influential?
 - Do you believe this depends on the subject?
 - If so, how? Can you elaborate on this?

Block 2: *Single versus multi-purpose agencies*

4. Now let's talk about the DG/executive agency you are working in. What reputation has your DG in society in your opinion?
 - Why do you think it has such a reputation?
5. Would you consider the reputation of your DG to be different than the reputation of the Commission in general? ? *-compare process and outcomes*
 - And if so in what respect?

Block 3: *Trust, Reputation and Legitimacy*

6. Now changing the topic a little: What do you think matters more for society: *How* efficient and well the Commission works or *what* it works in?
 - Would you think this depends on the audience? (interest groups or civil society)
 - If so, please elaborate your thought.
7. People often talk about the legitimacy of governments or public agencies. What is, in your opinion, the Commission's *legitimacy*? Or in other words: What builds its legitimacy?
 - Can you give me an example of building blocks of the Commission's legitimacy?

8. Do you think the Commission's legitimacy is homogenous across society, that is to say it is always the same across society?
 - If not, how do you think the legitimacy varies across audiences and why?

Block 4: Do you care?

9. And now conclusively, do you personally believe legitimacy is needed for the Commission's survival?
 - Why or why not?
10. And what could ultimately undermine the legitimacy of the Commission? Or what can build it?

XIII. Informed Consent

**European Commission expert interviews
Informed Consent**

The purpose of this document is to supply you with the information you need in order for you to provide your informed consent for your participation in this research project.

Statement of the research being undertaken

The study 'European Commission expert interviews' aims to better understand the reputation the European Commission holds with interest groups. The general purpose is to complement the quantitative part of the dissertation, which looks at the reputation of the Commission with European citizens (by using the Eurobarometer).

Procedures and duration

The research will use semi-structured interviews, which last between 15 and 30 minutes per participant. The interviews will be conducted in person, via video call or phone call and will be taped and transcribed in anonymous fashion.

Expected benefits and foreseeable risks

There are no foreseeable risks beyond those ordinarily encountered in daily life.

Voluntary Participation

The participation is voluntary, and every single interview gives the option to participants to stop at any time. Also, participants can opt to not answer questions they don't want to answer, and any withdrawal from the interview (no matter at which time of the research process) involves no penalty or other consequent actions.

Compensation

Participants will not be compensated for participating in the study.

Deception

The study does not involve any deception.

Research Participant Declaration

I confirm that I received the information that precedes, and I declare having read and understood its content. I confirm that I am 18 years of age or older, and volunteer to take part in this research. (Consent for minors or incapacitated individuals should be obtained from their legal tutors). Taking note that my Data are processed in full compliance with the Law, I freely consent to my Data to be used in the manner and uses described. I also declare having understood my rights and limitations, as well as how to exercise them.

Participant Name:

Signature:

Date:

ADDITIONAL INFORMATION: DATA PRIVACY AND MANAGEMENT

We are required to provide participants with certain information to communicate our compliance with General Data Protection Regulation n. 679/2016. UNIVERSITA' COMMERCIALE "LUIGI BOCCONI" (hereinafter referred to as "Bocconi University"), having its registered office in Milano at via Sarfatti 25, hereby declares that it falls within the field of application General Data Protection Regulation n. 679/2016 dealing with the protection of personal data with reference to the use of the data subject's personal data that is being collected as part of this research project.

Researchers' and Ethical Review Board Contact Information

- This research is being undertaken by Eva-Maria Schwarz (evamaria.schwarz@phd.unibocconi.it) at Bocconi University.
- If participants have any questions about how the research was undertaken, who will have access to and control of the data, and in case participants want to provide feedback, ask questions, or inquire about the results of the study, they should contact the researcher and/or the Data Protection Officer of Bocconi University at DPO@unibocconi.it.

Confidentiality and Security Measures

- Any identifying information/audio/recordings will be collected via tape, and destroyed once anonymized and transcribed.
- During the data storing, all data will be stored and protected by using a password protected file.
- I confirm that in the event of publication or presentation, that no identifying information will be disclosed.

- All data will be anonymized by randomly numbering interviews and deleting names, so individual participants cannot be identified.

Data Sharing

- Data transfers to third countries: The data will be transferred to Austria and Italy, where the researcher is currently placed and will be analysing it.
- Data about you collected for the purposes of this project and similar future projects may be transferred to and stored at a destination outside the European Economic Area ("EEA"), for example where it is processed by an organisation operating outside the EEA who works for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA. This process will be subject to appropriate safeguards to protect the security and confidentiality of your Data.
- Two other research assistants will be given access to the already anonymised personal data collected in the project in order to review first and second-order coding.

Data Subject's Rights

- Data subjects shall have the rights described in the articles 15, 16, 17 and 18 of General Data Protection Regulation n. 679/2016. In particular, for example, data subjects can require accessing to, correcting, erasing the personal data, and restricting our data processing activities.
- Please note that when data are processed for research purposes the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. Consider the following, stated in art. 17(3) GDPR, in particular:
 - the right to erasure shall not apply when is likely to render impossible or seriously impair the achievement of the objectives of the processing carried out in accordance with art.
 - 89(1) GDPR; the right to erasure and to object may not apply when research is carried out for reasons of public interest in the area of public health.

If you have given your consent and you wish to withdraw it, please contact the responsible of the relevant department using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, its withdrawal shall not cause any effect in the lawfulness of the previously processed Data.

Copyright Statement

Within the context of the research project, you consent that Bocconi University and the researcher edits, copies, archives, disseminates, and publishes your contribution to the project. Moreover, in accepting to participate in the project you expressly waive potential copyrights that could emerge from the result of the project, granting Bocconi

University and the researchers involved a non-exclusive, free, irrevocable and worldwide license to use your contribution for the purposes indicated above. If you wish to be aware of the results of the projects, the researcher will make all reasonable steps to inform you, when privacy or other legal concerns do not impede to do so.

If you have given your consent and you wish to withdraw it, please contact the researcher using the contact details set out above. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, its withdrawal shall not cause any effect in the lawfulness of the previously processed Data.

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