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MEDIA LITERACY IN THE AGE OF ALGORITHMIC CONTENT DISTRIBUTION: A COMPARATIVE ANALYSIS OF EUROPEAN AND US APPROACHES

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ABSTRACT

The article examines media literacy in the age of algorithmic content distribution through a comparative analysis of European and US institutional responses. Its aim is to identify structural differences between the EU Paternalistic-Rights Model and the US Libertarian-Market Model, assess their internal coherence, and reconsider the concept of media literacy in the context of algorithmic and generative conditions. The study's relevance stems from the erosion of source stability, provenance, and user agency in platform-mediated environments. Its novelty lies in combining comparative typology with the concept of infrastructural literacy, defined as users' depth of engagement with algorithmic mediation. The article concludes that both regimes form self-reinforcing configurations shaped by regulatory, educational, normative, and platform-related dimensions. The EU model supports rights-based compliance and curricular integration, while the US model relies on civil society, markets, and dispersed educational initiatives. Both approaches retain blind spots in cross-platform circulation, generative AI, and citizen-infrastructure asymmetry. The article will be useful to media scholars, policy researchers, educators, regulators, and communication management specialists.

KEYWORDS: media literacy, algorithmic content distribution, comparative media policy, algorithmic reflexivity.

1. INTRODUCTION

Through most of the twentieth century, the question of media literacy was framed around editorial mediation. Newspapers, broadcasters, and publishers selected, packaged, and delivered content to audiences whose literacy lay in evaluating identifiable sources, recognizing genre conventions, and interrogating ideological framings [1]. This paradigm rested on a stable mediating layer. A journalist or editor, however contested their decisions may be, remained attributable, comparable, and subject to professional and legal accountability.

Algorithmic content distribution has reorganized that layer. Recommender systems, ranking



algorithms, and now generative models mediate the encounter between audience and content at the infrastructural level. The editorial level has receded [2]. The choice of what reaches a user, in what order, alongside what other items, and under what framing comes from no discernible institutional actor whose mandate, ideology, and method are open to critique. It comes from socio-technical systems whose logic is opaque, whose outputs are personalized and ephemeral, and whose operation answers to commercial and computational objectives that never surface to the user [3].

What follows for media literacy is no incremental shift. The competencies that classical media literacy cultivates, including source verification, claim corroboration, lateral reading, and genre recognition, depend on the very conditions that algorithmic distribution erodes. Identifiability of the source has weakened. The artefact's stability has weakened. The primacy of user choice over institutional pre-selection has weakened. The growing literature on algorithmic awareness and algorithmic literacy registers this tension [4]. Its dominant response adds algorithmic competencies to the classical inventory. This article holds that an additive response misses the structural problem. The comparison of the two most consequential regulatory and educational responses to the algorithmic turn, those of the European Union and the United States, reveals why.

Generative artificial intelligence has sharpened the question. Recommender systems still operated on a pool of human-produced material. Generative models synthesize content at the moment of user query, often with no stable pre-existing referent that could be verified, attributed, or corroborated by an independent observer. The traditional architecture of trust in mediated information runs from witness to journalist to editor to publication. Generative pipelines bypass that architecture at the relevant points [5]. If classical media literacy was designed for an environment where the question "who said this and on what basis" had an answerable referent, the algorithmic-generative environment turns that same question into one whose referent recedes from view.

The concept of media literacy has been reformulated several times since its emergence as a field. Early protectionist approaches treated the audience as vulnerable to media influence and emphasized inoculation against propaganda and commercial persuasion [6]. The critical turn of the 1980s and 1990s, associated with Buckingham, Masterman, and the British cultural studies tradition, reframed literacy as the cultivation of analytical capacities through which audiences read media texts as ideological objects [7]. The digital turn of the 2000s widened the object to user-generated content, participation, and remix, repositioning the literate citizen as producer alongside reader [8]. Each reformulation expanded the inventory of competencies. None revisited the underlying premise: the object of literacy is content, meaning texts, images, narratives, encountered through identifiable mediating institutions.



The algorithmic turn unsettles that premise. Scholarship on filter bubbles and echo chambers, opened by Pariser's popular intervention [9], first framed algorithmic curation as distortion: algorithms narrow exposure and harden ideological priors. Later empirical work has complicated the thesis. The dominant effect of recommender systems may be cross-cutting exposure. Enclosure may be the secondary effect. Filter bubble effects appear contingent on platform and user behavior. The most damaging dynamics seem to come from amplification of emotionally charged material [10]. The debate stays tethered to the content layer. A different line of inquiry has begun to emerge, focused on the user's relation to the recommender system itself: awareness of it, folk theories about its operation, tactical attempts to influence it [11].

The history of media literacy has tracked the dominant form of mediation in each era. Print-era literacy concerned itself with reading the institutional press: identifying publishers, recognizing editorial stance, and understanding journalistic conventions. Broadcast-era literacy added audiovisual codes and the political economy of advertising-supported mass media. The digital turn added user-generated content, participation, and the recognition that audiences also produce. In each era, the mediating layer changed in observable ways, and literacy was reformulated to match. The algorithmic-generative turn presents the same inflexion. The mediating layer has shifted again, moving from editorial selection to algorithmic curation and onward to generative synthesis. The question is whether the response will keep the additive pattern of earlier reformulations and add new competencies to the inventory, or whether the structural change in the mediating layer demands a deeper reframing. Section 4.2 develops the case for the second reading.

Comparative studies of media literacy policy have grown in the past decade. They fall into two patterns. The first compares Western approaches at the broad level with those of other regions, framing the comparison around democratic versus non-democratic governance of information [12]. The second focuses on educational implementation within single jurisdictions, assessing curricular integration, teacher training, or programmatic outcomes [13].

A systematic typological comparison of the two transatlantic models, the EU and the US, has yet to be developed. Such a comparison would treat them as institutional regimes constituted to govern media literacy under algorithmic conditions. Existing transatlantic comparisons isolate policy elements: one on platform regulation, one on educational programs, and one on fact-checking ecosystems [14]. Few studies ask whether the elements form coherent regimes whose internal logic explains why certain reforms are easy in one jurisdiction and costly in the other. Fewer still connect typological analysis with the conceptual question of how algorithmic mediation reshapes the object of literacy itself.



Without a typological reading, transatlantic policy debate proceeds as element-by-element negotiation in which each side measures the other against its own institutional logic. The EU sees a patchwork of fragments, while the US sees institutional pluralism. The US sees regulatory overreach, while the EU sees rights protection. The structural reasons why each regime cannot import the other's instruments wholesale remain underexplained. Without a conceptual reframing of what media literacy is for in an algorithmically mediated environment, both regimes risk optimizing instruments whose underlying premises the environment has already moved past. This article addresses both gaps in a single analytical movement.

This article addresses three research questions:

RQ1: How do European and US approaches to media literacy differ in structural terms under conditions of algorithmic content distribution?

RQ2: Do those differences add up to coherent institutional regimes whose dimensions are internally interdependent, or do they only co-occur?

RQ3: What conceptual consequences follow from these regimes, and from their shared blind spots, for the concept of media literacy itself in algorithmic environments?

The contribution of this article is threefold. The first contribution is a typology of two media literacy regimes, the Paternalistic-Rights Model of the EU and the Libertarian-Market Model of the US, with the demonstration that their five characterizing dimensions interlock at the structural level. The second contribution draws on the comparative tradition of Hallin and Mancini [15]. It tests this typology against the post-Brexit United Kingdom as a deviant case, showing both the transferability of individual dimensions and the institutional fragility of hybrid configurations. The third contribution proposes a conceptual shift from content literacy to infrastructural literacy. Infrastructural literacy is defined by the depth at which users engage with the layered architecture of algorithmic mediation. Judged against this redefined object, both regimes display structural blind spots.

The argument builds on the author's prior comparative work on media literacy in Russian and Chinese contexts [12]. It extends the comparative frame to the transatlantic axis. Section 2 specifies the methodological design. Section 3 presents the European and US approaches and constructs the typology. It tests the typology against the UK case. Section 4 discusses the structural blind spots of both regimes. It develops the concept of infrastructural literacy. It draws out consequences for theory, practice, and the management of commercial communications.

2. METHODOLOGY

This article adopts a conceptual-analytical design in the tradition of comparative-typological media policy analysis. The methodological reference point is Hallin and Mancini's Comparing Media



Systems, [15], together with its later extensions to digital and platform-mediated environments [16]. The objective is to construct a typology of institutional regimes and to interrogate its conceptual consequences. It is neither hypothesis testing through quantitative aggregation nor an exhaustive systematic review. The method has a long-standing place in media policy and political communication research. Structural-comparative claims about institutional configurations cannot be settled by counting cases. They require a different kind of argument.

The article does not adopt the PRISMA protocol for systematic review. Its claims concern the structural coherence of institutional configurations and not the aggregate findings of an empirical literature. Where systematic review answers the question "what does the literature show", typological analysis answers the question "how are the elements of a domain organized". The two are different research designs. They answer different questions and demand different methodologies. The present design is the second.

The analysis is built on three cases. The two primary cases are the European Union and the United States. They were selected because they represent the two most consequential and most contrasting institutional responses to algorithmic mediation in advanced economies. Their market scale and regulatory reach also structure the global environment in which most other jurisdictions operate. A comparison that explains why these two diverge, therefore, carries consequences well beyond the two cases themselves.

The third case is the post-Brexit United Kingdom, treated as a deviant case in the methodological sense developed by Lijphart and elaborated in qualitative comparative analysis [17]. The UK inherited the European regulatory tradition through decades of EU membership and continues to operate strong sectoral regulators in the European mould, with Ofcom as the leading example. Since 2016, it has also oriented itself politically and culturally toward Anglo-American legal and market traditions. This dual inheritance makes the case a natural experiment for the typology. The UK possesses elements drawn from both regimes. Testing it shows whether those elements transfer in isolation or cohere only within their original institutional setting.

Three case-selection considerations bear notice about different regimes. The EU is treated as a single institutional configuration. Variation among member states remains real. The regulatory architecture that matters here, including the DSA, AVMSD, AI Act, and EMFA, operates at the supranational level and structures national variation, without competing with it. Second, the temporal frame is 2018 to 2025. This window covers the maturation of the EU's platform regulation agenda from the proposed Digital Services Act through its entry into force, the consolidation of the US state-level legislative wave, and the emergence of the Online Safety Act in the UK. Third, the analysis is structural-



comparative and not evaluative. The goal is to identify the institutional logic of each regime. Ranking them is not in scope. Whether the EU model is preferable to the US model, or the reverse, is a normative question. It depends on values external to the typology. Readers operating within those normative frames will draw their own conclusions.

The corpus underlying the analysis comprises three types of material. The first type is primary regulatory and policy documents. EU instruments include the Digital Services Act, the Audiovisual Media Services Directive, the European Media Freedom Act, and the AI Act, together with the working documents of the European Media Literacy Expert Group. US documents include NAMLE position papers, FCC and FTC reports, and state-level media literacy legislation in Illinois, New Jersey, California, and Texas. UK documents include the Online Safety Act 2023 and Ofcom's Media Literacy Strategy.

The second type is peer-reviewed academic literature published between 2018 and 2025. It was identified through Scopus and Web of Science using combinations of the keywords media literacy, algorithmic literacy, algorithm awareness, platform regulation, Digital Services Act, and Section 230. The temporal window captures the period after the General Data Protection Regulation, during which algorithmic governance moved into the regulatory mainstream.

The third type is reports from established research institutions, including the Reuters Institute Digital News Report, Pew Research Center surveys on algorithmic awareness, Knight Foundation work on news ecosystems, and the European Digital Media Observatory's analytical outputs. These complement the academic literature with the current empirical context.

The comparison is structured along five dimensions. These dimensions were derived inductively from the policy literature and refined through dialogue with the comparative-typological tradition.

The first dimension is the driver. It refers to the force that advances media literacy policy. This force may be regulatory, market-based, civil-society-based, or educational. The second dimension is the locus of action. It refers to the institutional level at which policy is formed and enforced. This level may be supranational, national, sub-national, or non-governmental. The third dimension is the normative anchor. It refers to the foundational value that is used to justify or contest policy. Such values include rights, public interest, free speech, and individual responsibility.

The fourth dimension is educational integration. It refers to the way media literacy is incorporated into formal education. This incorporation may take a curricular, top-down form; a patchwork, bottom-up form; an optional form; or be absent. The fifth dimension is the relation to platforms. It refers to the



structural relation between public authority and technological intermediaries. This relation may involve compliance and obligation, voluntary partnership, market exchange, or adversarial postures. Together, these five dimensions cover the institutional, normative, and operational aspects of media literacy policy. They also support typological inference. Each value within one dimension makes some values in neighboring dimensions institutionally more probable. It makes other values institutionally more costly.

3. RESULTS

3.1 The European approach

The European approach to media literacy in algorithmic environments rests on an explicit regulatory architecture. Obligations on platforms are paired with educational mandates on member states. The Digital Services Act, in force across the EU since 2024, occupies the central position. Articles 34 and 35 address systemic risk assessment and mitigation for very large online platforms. They treat algorithmic recommender systems as objects of regulatory scrutiny in their own right. Platforms must assess and mitigate risks to fundamental rights, civic discourse, public security, and the protection of minors and consumers [18, Arts. 34 and 35]. Article 27 imposes transparency obligations on recommender system parameters. Article 38 obliges very large platforms to provide at least one non-profiled option [18, Arts. 27 and 38].

The regulatory regime is reinforced by adjacent instruments. The Audiovisual Media Services Directive obliges member states to promote and develop media literacy skills, including in the context of video-sharing platforms [19, Art. 33a]. The European Media Freedom Act, adopted in 2024, complements the picture with provisions on editorial independence and pluralism [20]. The AI Act, also adopted in 2024, addresses transparency and risk-classification of AI systems, including those used in content curation and generation [21]. These instruments form a layered regulatory environment in which media literacy operates as an organizing rationale across several adjacent regulatory regimes. It does not stand as a separate policy.

Enforcement under the DSA has moved from a theoretical possibility to an active practice. In December 2025, the European Commission issued its first non-compliance decision under the DSA, imposing a €120 million fine on X for failures in three transparency areas: the deceptive design of its verification system, the inadequacy of its advertising repository, and the obstruction of researcher access to public data [22]. In October 2025, the Commission issued preliminary findings against TikTok, and also Meta, for failure to comply with their obligations under Article 40 to provide data access to researchers. Meta's Facebook and Instagram received preliminary findings for "dark patterns" in notice-and-action mechanisms [23]. The Commission sent out requests for information to YouTube, Snapchat, and TikTok in November 2024 regarding the design of their recommender



systems and the amplification of systemic risks [24]. The responses were varied. Meta has stated that it "disagrees with any suggestion" of DSA breach. TikTok has pointed to tension between researcher access and the GDPR's data protection requirements. The disagreement matters for the typology developed in Section 3.3. The regulatory driver operates through contested interpretation, and compliance posture itself becomes a site of negotiation between platforms and the Commission.

The institutional infrastructure around these instruments is dense. The European Commission's Media Literacy Expert Group, convened since 2014, brings together representatives from member states and produces working materials and best-practice guidance [13]. The European Digital Media Observatory and its national hubs coordinate fact-checking, media literacy, and platform research [25]. The annual Media Literacy Week initiative supports public visibility [26]. These structures share two features: they are state-anchored and supranationally coordinated; and they treat media literacy as a public-interest matter.

National implementations vary in detail. They conform to a common pattern of state-directed curricular integration. Finland's national media literacy policy, anchored in the National Audiovisual Institute and the cross-sectoral New Literacies development programme, integrates literacy into compulsory education and adult learning [27]. France's Centre pour l'éducation aux médias et à l'information (CLEMI), operating under the Ministry of Education, embeds media literacy into primary and secondary curricula [28]. Germany's federal Medienbildung frameworks operate through state-level Medienbildungspläne, coordinated nationally [29]. Across these variations, the locus stays in the state. The driver stays regulatory and educational. The integration stays curricular and top-down.

The European model, in first approximation, is top-down, rights-anchored, and educationally integrated. Platforms are treated as objects of structured obligation. They are not treated as autonomous partners. Citizens are addressed as bearers of rights whose protection requires both content-level safeguards and the cultivation of literacy competencies through state-organised education. This first approximation will be sharpened in Section 3.3. The analytical claim is that these features interlock at the structural level.

Two features distinguish this model from its closest historical analogues. The first feature is the supranational locus. Earlier European media literacy initiatives, including the pre-DSA work of the European Commission and the Council of Europe, operated through coordination and recommendation. They lacked direct supranational regulatory authority. The DSA changes the institutional standing of platform regulation. With it, the standing of the media literacy concerns that the DSA's risk framework also absorbs changes. The second feature is the explicit linkage between platform regulation and educational policy. AVMSD Article 33a obliges member states to promote



media literacy in the context of the platform regulation it elsewhere prescribes. Educational integration in this configuration is a complementary instrument within an integrated regulatory architecture. It is not an autonomous policy domain.

The architecture also produces measurable activity at the citizen interface. Since 2024, EU users have appealed content moderation decisions through platforms' internal mechanisms, resulting in reversals in close to 30% of cases. In the first half of 2025, out-of-court settlement bodies reviewed over 1,800 disputes concerning content on Facebook, Instagram, and TikTok, reversing platform decisions in 52% of closed cases [30]. Compliance reaches downward to citizens, who acquire procedural standing through DSA mechanisms.

3.2 The US approach

The US approach to media literacy in algorithmic environments rests on a distributed civil society infrastructure. It does not rest on a regulatory architecture. The National Association for Media Literacy Education functions as the principal coordinating body. It convenes practitioners, publishes the Journal of Media Literacy Education, and articulates the field's core principles [31]. Media Literacy Now operates as a policy advocacy organization tracking state legislation [32]. The News Literacy Project focuses on journalism-adjacent literacy and supplies classroom resources at scale [33]. These organizations are non-governmental and professionally networked. Their funding comes from foundations. Direct public funding plays a limited role.

University research centers occupy a significant position in the institutional structure. The Stanford History Education Group has produced widely cited empirical work on civic online reasoning and lateral reading, with substantial influence on curriculum design [34]. The Annenberg School at the University of Pennsylvania, the Berkman Klein Center at Harvard, the MIT Center for Constructive Communication, and the Shorenstein Center serve as central nodes of academic production. The fact-checking ecosystem, anchored institutionally by the Poynter Institute's International Fact-Checking Network, operates as a quasi-professional infrastructure with its own code of principles [35]. None of these structures depends on or coordinates through a federal regulatory body.

The regulatory context decisively shapes the institutional landscape. Section 230 of the Communications Decency Act immunizes platforms from liability for user-generated content. The immunity forecloses a European-style regulatory architecture in which platforms are framed as duty-bearers for the content effects they produce [36]. First Amendment jurisprudence imposes further constraints. Government-mandated media literacy curricula that prescribe how citizens should evaluate political speech raise constitutional questions about compelled speech and government speech doctrines. Such questions sit outside European debates [37].



In the absence of federal legislative action, the principal regulatory development has been at the state level. Illinois enacted HB 234 in 2021, requiring high schools to provide media literacy instruction. New Jersey followed with broader information literacy legislation in 2023. California, Texas, and several other states have advanced or enacted related measures. Scope and prescriptiveness vary widely [38].

The US model, in first approximation, is bottom-up, pluralistic, and market- and civil-society-driven. Platforms are treated as partners or adversaries within a market-and-rights framework. They are not treated as objects of structured public obligation. Citizens are addressed as autonomous agents whose literacy is to be cultivated through non-governmental channels. State-level educational legislation supplies a patchwork supplement. As with the European case, this first approximation will be sharpened in Section 3.3 through the interlocking argument.

Two features distinguish this configuration. The first feature is the centrality of the foundation-funded ecosystem. Major US foundations supply a substantial portion of the field's operating resources. Their grantmaking priorities shape the institutional landscape in ways without a direct EU analog. The EU's media literacy infrastructure draws public funding from national education budgets and EU programmes. The US infrastructure draws private capital from philanthropic foundations that retain discretionary direction over its deployment. The second feature is the dispersion of expertise across legal, academic, journalistic, and educational institutions. No coordinating body of comparable authority to the European Commission's Media Literacy Expert Group exists. The dispersion is sometimes called fragmentation. The framework in Section 3.3 reads it as institutional pluralism that is itself a feature of the regime.

3.3 Building the typology: two coherent institutional regimes

A side-by-side comparison of policy elements is a standard analytical move. It does not on its own establish a typology. Listing five characteristics of the EU response and five of the US response produces a descriptive matrix. The matrix is not yet a typological claim. The typological claim is that the values of the five dimensions in each jurisdiction are interlocked at the structural level. Each value makes neighboring values institutionally probable. Each value makes opposing values institutionally costly.

The methodological reference for this move is Hallin and Mancini's three-model typology of media systems [15]. The argument was not that the four dimensions, including state intervention, political parallelism, journalistic professionalism, and market development, happened to align in the Polarized Pluralist, Democratic Corporatist, and Liberal models. The argument was that the dimensions

sustained one another. A strong state role in media history made political parallelism more probable. Political parallelism made the development of an autonomous professional culture more difficult. Weak professionalism limited the development of a market-driven press in its complete form. The same analytical move is available for media literacy policy under algorithmic conditions. The present section makes it. The comparative matrix is presented in Table 1.

Table 1: Comparative matrix of dimensions of EU and US media literacy regimes

<i>Dimension</i>	<i>European Union</i>	<i>United States</i>
Driver	Regulation via DSA, AVMSD, and AI Act	Market and civil society via NGOs, foundations, and platforms
Locus of action	Supranational + state	NGOs, universities, platforms, state-level legislatures
Normative anchor	Fundamental rights; public interest	Free speech; individual responsibility
Educational integration	Curricular; top-down; nationally coordinated	Patchwork; state-level; bottom-up
Relation to platforms	Compliance / structured obligation	Voluntary partnership / market exchange

The label Paternalistic-Rights warrants brief defense. Paternalistic, in the political-philosophical tradition stemming from Dworkin and elaborated in welfare state theory by New and Le Grand, denotes an institutional posture in which the state acts as guarantor of citizens' interests, including against their immediate preferences [39]. Rights denote the normative justification for that posture. The citizen is owed protection of informational autonomy as a matter of right. The term is descriptive within this tradition. It is not pejorative. It is used here without normative judgment. Alternative terms, such as protective-regulatory or public-interest, capture parts of the configuration. They lose the connection between institutional posture, the paternalistic part, and normative justification, the rights part. The typological argument requires that connection.

The structural interlocking of the five dimensions can be reconstructed through four institutional



linkages.

Linkage 1: Normative anchor → Locus. A rights-anchored normative framework requires an institutional actor capable of guaranteeing those rights across the algorithmic environment in which they are exercised. At the national level alone, such an actor lacks reach. Very large platforms operate across borders. Rights guarantees confined to the national territory leave their effective exercise to the platform's discretion. Rights-anchoring generates pressure toward a supranational locus, namely the Commission and its relevant directorates. The Digital Services Act gives institutional expression to this linkage. Its EU-wide applicability and its designation of very large online platforms under direct Commission supervision instantiate the rights-locus connection [18].

Linkage 2: Locus → Driver. A supranational locus has no market levers at its disposal. The EU is not a buyer of platform services at scale. It does not own platforms that could compete. Its available instruments are regulatory. They include legislation, supervision, and sanctions. The supranational locus therefore selects for a regulatory driver as a matter of institutional capability. A market-driven approach at the supranational level would lack the necessary instruments. The regulatory driver is what remains available.

Linkage 3: Driver → Educational integration. A regulatory driver, operating through member states, finds its educational expression in curricular integration as the path of least resistance. The state organizes mass education in EU member states. Curricular mandates are the standard instrument by which regulatory policy reaches the classroom. The Finnish, French, and German cases discussed earlier illustrate the pattern. A bottom-up, civil-society-led educational approach is conceivable in principle. It would conflict with the regulatory driver's preference for systematic and auditable coverage [40].

Linkage 4: Driver + Normative anchor → Relation to platforms. Where the driver is regulatory, and the normative anchor is rights, the relation to platforms takes the form of compliance. Platforms become duty-bearers. Citizens become rights-bearers. The regulator becomes the supervising authority. The DSA's risk assessment regime, the AI Act's classification of high-risk systems, and EMFA's editorial independence provisions all instantiate this configuration [41].

The four linkages do not assert functional necessity in a strong sense. Alternative configurations are conceivable. What the linkages assert is institutional stability. Shifting one dimension toward the US-type value generates friction across the other dimensions. A market-driven approach at the supranational level lacks instruments. A patchwork educational approach conflicts with the regulatory rationale of systematic coverage. A voluntary partnership with platforms sits in tension with a rights



anchor. The Paternalistic-Rights configuration is self-reinforcing in the institutional sense. Each dimension's value lowers the cost of maintaining the others. Each dimension's value raises the cost of changing any one in isolation.

Two corollaries follow. The first corollary concerns reform from outside. Proposals that import individual elements from the US model, such as increased platform voluntary partnerships at the expense of compliance obligations, or the delegation of educational content to civil society, encounter institutional resistance that goes beyond bureaucratic conservatism. The resistance is due to dimensional interlocking. The second corollary concerns reform from within. Genuine reform tends to take the form of deepening the existing configuration. It does not take the form of substituting elements from elsewhere. The DSA's transparency provisions, the AI Act's risk classification, and EMFA's editorial independence safeguards all extend the Paternalistic-Rights logic. They do not depart from it. This pattern fits the typological reading. When the regime extends itself, the extensions cohere with the existing dimensions. When the regime imports from elsewhere, friction follows.

The label Libertarian-Market warrants its own defense. Libertarian, within American political-theoretical discourse, denotes a normative orientation prioritizing individual liberty and minimal state regulation of speech and expression. The term has technical content distinct from its popular usage. It is descriptive here [42]. The market and civil society are the primary institutional spaces within which media literacy is cultivated. Alternatives, such as pluralist-market or rights-libertarian, lose the explicit grounding in the First Amendment as a constitutional anchor.

Linkage 1: Normative anchor → Driver. First Amendment jurisprudence makes a regulatory driver constitutionally costly in two respects. State prescription of how citizens should evaluate political speech encounters compelled speech and government speech doctrines that have no direct EU analog. State-imposed obligations on platforms regarding content effects are subject to additional constitutional constraints. Section 230's statutory immunity reinforces the constraints. The available driver shifts toward the market and civil society. Prescription in those spaces does not raise the same constitutional concerns. Foundation funding, NGO networks, and platform-led initiatives become the principal channels [43].

Linkage 2: Driver → Locus. A market-and-civil-society driver makes a unified institutional locus impossible. No single body analogous to the European Commission holds the mandate and capacity to coordinate the field. The locus distributes itself across NGOs, including NAMLE, the News Literacy Project, and Media Literacy Now. It is distributed across university centers, including Stanford, Annenberg, Berkman Klein, and MIT. It is distributed across fact-checking organizations accredited by IFCN. It distributes across platforms themselves, through their civic integrity and trust-



and-safety programs. The distributed locus arises from institutional structure. It is not a deliberate choice. The alternative, a centralized locus, is foreclosed by the driver.

Linkage 3: Locus → Educational integration. A distributed locus combined with the federal structure of US education, in which curricular authority rests with states, makes unified educational integration unavailable. The natural form is patchwork. State legislation in Illinois, New Jersey, California, Texas, and elsewhere takes distinct shapes. No federal mandate analogous to AVMSD's Article 33a exists. The constitutional and institutional path to one is not straightforward.

Linkage 4: Driver + Normative anchor → Relation to platforms. Where the driver is market, and civil society and the normative anchor is free speech and individual responsibility, the relation to platforms takes the form of voluntary partnership. Compliance does not provide the frame. Platforms invest in literacy initiatives for reputational, regulatory-preemptive, and commercial reasons. They are not duty-bearers in the European sense. Section 230 reinforces the configuration by removing the liability-based lever that European regulators wield [44].

The same logic of institutional stability applies. An attempt to introduce a federal media literacy mandate confronts constitutional and political resistance. An attempt to subject platforms to systematic compliance obligations confronts Section 230 and the First Amendment doctrine. An attempt to centralize the institutional locus confronts the distributed funding and professional structures that have grown into the role. The Libertarian-Market configuration is self-reinforcing in the same institutional sense as the Paternalistic-Rights configuration. The reasons are symmetric.

The corollaries mirror those drawn for the EU. Reform proposals that import European elements, including federal media literacy mandates, EU-style platform compliance regimes, and supranational coordination through some new federal body, encounter structural resistance that runs beneath partisan opposition. The resistance stems from the constitutional anchor and the institutional pluralism it produces. Reform within the regime tends to deepen the existing configuration. It does not substitute elements from outside. More state-level legislation in place of federal preemption. More foundation funding in place of direct public budgeting. More platform voluntary commitment in place of statutory obligation. The pattern matches the EU case with the polarity reversed.

The symmetry is the typological point. The two models do not represent better- and worse-case implementations of a common project. They are coherent institutional regimes. Each regime's elements presuppose and sustain one another. Each regime is, in part, institutionally costly to reform. Figure 1 visualizes the institutional linkages developed in this and the preceding subsection.

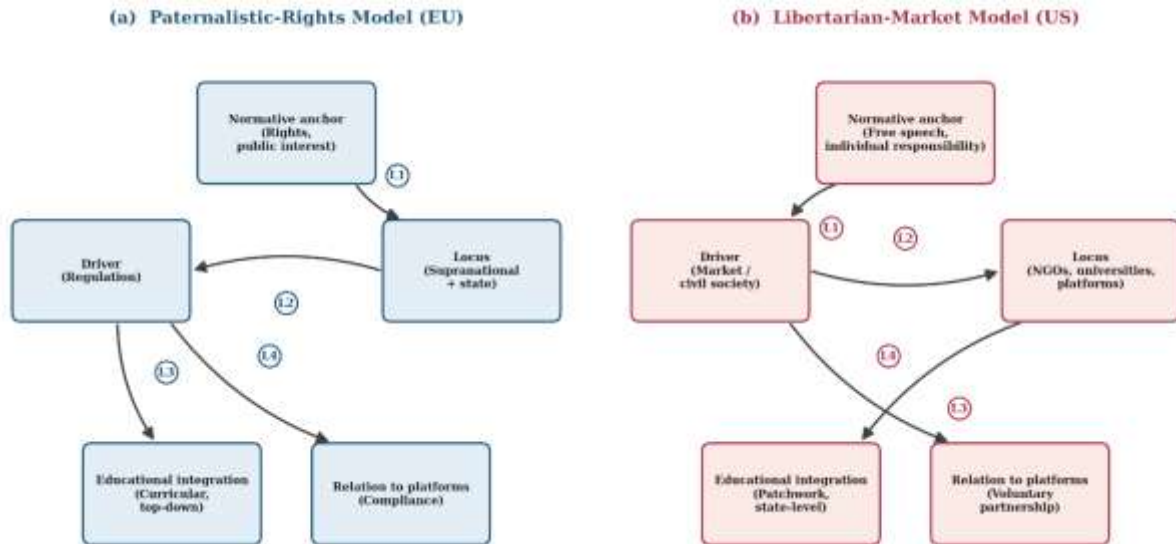


Figure 1: Structural interlocking of dimensions in the two regimes with linkages L1–L4

A typological argument of the form developed above faces an objection. The objection holds that institutional interlocking has been described but has not been shown to be more than coincidence. The deviant case method addresses this objection. It examines a case that combines elements from both regimes. The question is whether the combination operates with the institutional stability the typology predicts, or whether it generates friction at the interfaces instead.

The post-Brexit United Kingdom suits this test. The UK inherited the European regulatory tradition through decades of EU membership. It retains strong sectoral regulators, with Ofcom as the leading example. The Online Safety Act 2023 has implemented a regulatory architecture for online content that bears strong family resemblance to the DSA in scope and ambition [45, 46]. Since the 2016 referendum, the UK has also oriented itself politically and rhetorically toward Anglo-American legal and economic traditions. Explicit appeals to free expression and reduced regulatory burden featured in the Online Safety Act's parliamentary passage [47].

The five-dimensional reading of the UK case shows a hybrid configuration. The driver is regulatory. This reflects the inheritance of the European regulatory tradition. Ofcom is the central regulator and has enforcement powers under the Online Safety Act. In this respect, the UK case matches the EU model.

The locus of action is national. The UK has withdrawn from the EU regulatory space. There is no equivalent of supranational coordination through the Commission and the Council. In this dimension, the UK case departs from the EU model and converges toward the US model.



The normative anchor is mixed. The Online Safety Act foregrounds harm prevention, a typical EU rights-based concern. It also contains extensive provisions that safeguard freedom of expression and journalistic content. These provisions resonate with the US model. This creates a hybrid position.

Educational integration is curricular, although it remains uncoordinated. Media literacy elements are included in the national curriculum framework. They lack supranational coordination or reinforcement. Ofcom's Media Literacy Strategy functions as the principal national-level coordination instrument. In form, this is closer to the EU model. In its institutional setting, it remains isolated.

The relation to platforms is based on compliance with national enforcement. Ofcom's enforcement powers under the Online Safety Act create a compliance relation at the national level. In form, this matches the EU model. Its national locus constrains this relation.

Three observations follow. First, compliance obligations without a supranational locus operate at a structurally weaker level than the EU equivalent. Very large platforms are global. Ofcom's enforcement reach is national. The same regulatory ambition that the DSA delivers across a market of approximately 450 million consumers, the Online Safety Act delivers across approximately 67 million. Platforms can treat UK compliance as a national exception within a larger global compliance picture. They do not have to treat it as a structuring constraint. Market scale supports the EU's compliance regime in a way that scale alone does not support the UK's.

Second, curricular educational integration without supranational normative reinforcement carries greater ideological vulnerability. EU-level rights discourse absorbs and frames national debates about media literacy curricula. The UK has hosted ongoing political contestation over what may be legitimately taught. Debates around critical perspectives in education, around protections of belief, and around the scope of online safety provisions in schools have surfaced tensions left submerged in EU member states by the supranational normative architecture [47].

Third, a hybrid normative anchor produces regulatory uncertainty. The Online Safety Act passed through multiple iterations. It could not resolve the tension between rights-based harm prevention and free expression protection without residue. The EU resolves this tension by prioritising rights, as expressed in the Charter of Fundamental Rights. The US resolves it by prioritising the First Amendment. The UK position is intermediate. The institutional cost of that intermediacy is evident in the legislative process and in the still-elaborated implementing guidance [47].

The deviant case analysis sharpens the typological claim. The typology does not claim that no other configurations are possible. The UK demonstrates that hybrid configurations exist and operate. The



typology claims that the EU and US configurations are institutional attractors. Hybrid positions are workable. They require ongoing political work to manage friction at the dimensional interfaces. Over time, they tend to drift toward one of the two attractors. They may also settle into a distinct equilibrium of their own. The UK case supports the typology. It does not undermine it.

A subtler implication concerns the cost of partial transfer. The Online Safety Act represents a substantial regulatory project: years of development, contested parliamentary passage, and extensive implementing guidance still being elaborated by Ofcom. The institutional effort required to construct a compliance regime at the national scale, without the supranational coordination the EU's equivalent benefits from, is considerable. Much of that effort is absorbed by the dimensional friction the typology predicts. Hybrid configurations are workable. Their institutional cost runs higher than either attractor's, and the higher cost is itself a feature of the typology.

4. DISCUSSION

4.1 Structural blind spots of both models

The typological argument developed in Section 3 establishes that the EU and US regimes are coherent and self-reinforcing. It does not establish that either is adequate to the algorithmic environment it seeks to govern. This section identifies three structural blind spots that both regimes share. Each blind spot is rooted in features of the regimes themselves and not in implementation failure.

Cross-platform circulation. Both regimes were architected around individual platforms as units of regulatory or partnership attention. The DSA's risk assessment regime, the Online Safety Act's enforcement mechanisms, and the US patchwork of platform–civil-society partnerships all proceed platform by platform. The empirical reality of algorithmic content is circulation. A video originates on one platform. It is repackaged and amplified on a second. It is fact-checked or debunked by a third party. It is mutated through generative tools and recirculated. The harms that media literacy is meant to address, including mis- and disinformation, manipulation, and polarization, are properties of the circulation. They are not properties of any single platform's output [48]. The platform-by-platform structure of both regulatory regimes leaves the inter-platform layer institutionally unaddressed. Commission enforcement under the DSA illustrates the gap: TikTok, AliExpress, Facebook, Instagram, and X are pursued as separate proceedings, each with its own requests for information and timelines.

Generative artificial intelligence. Both regimes were designed for a content environment in which recommender systems select from a pool of pre-existing human-produced material. Generative AI changes the situation in kind. Content gets synthesized at the moment of user query, often without a stable pre-existing artifact at all. The EU's AI Act is the most developed regulatory response. It



addresses high-risk AI systems and certain transparency obligations [21]. Media literacy policy as conceived in the DSA and AVMSD, assumes content with provenance. It does not assume content as synthesis. The US position is more fragmented. NAMLE guidance on AI literacy has begun to emerge, but it has not yet integrated regulatory architecture [49]. Both regimes stand behind the artifact they would govern.

The citizen-infrastructure asymmetry. Both regimes address citizens in the register of rights or responsibilities. They address platforms registered as obligations or partnerships. Neither addresses the underlying asymmetry between an individual citizen and an algorithmic infrastructure in any sustained way. The citizen cannot inspect the system. The citizen cannot give consent of substance to its operation in the way that contract law assumes. The citizen cannot exit it as market theory assumes. Both regimes operate as if media literacy were a competence cultivated in a citizen who then encounters platforms on terms of parity. The empirical condition lies closer to a citizen's encounter with an urban infrastructure: roads, utilities, transit. Literacy in that setting is a matter of operating, surviving, and contesting an environment one did not design and cannot reshape unilaterally. It is something other than a better-informed choice [50].

These three blind spots cannot be filled by additional initiatives within each regime. They are properties of the regimes themselves. The platform-by-platform architecture. The content-with-provenance assumption. The symmetric-encounter framing. Addressing them requires a reconceptualization of what media literacy is for.

One further observation belongs here. The three blind spots cluster around a common theme. Cross-platform circulation outstrips platform-bounded regulation because the unit of regulatory attention does not match the unit of empirical harm. Generative AI outstrips content-with-provenance regulation because the artifact has detached from its institutional production chain. The citizen-infrastructure asymmetry outstrips the symmetric-encounter framing because the encounter is between a person and an environment, with no parity. The limitation in each case arises from the same underlying feature. The regimes treat the algorithmic environment as a set of intermediaries with content. The empirical condition is an infrastructure with users. The diagnosis points toward a redefinition of the object that media literacy aims to address. Section 4.2 supplies that redefinition.

4.2 A conceptual shift from content literacy to infrastructural literacy

Algorithmic content distribution does not extend media literacy by adding another competency. It strips classical media literacy of its grounding at the structural level. The object on which classical literacy operates, content encountered through identifiable institutional mediation, has become unavailable. Three mechanisms account for the insufficiency.



Source-opacity. Classical media literacy assumes that the source of a given item is identifiable. The user's task is to evaluate that source's credibility, ideology, and method. In an algorithmically curated feed, the proximate "source" of a user's encounter with an item is the recommender system. It is not the institutional or individual producer of the item. The recommender's selection criteria are, in commercially significant respects, undisclosed. When general principles are made public, the application to a specific user at a specific moment is not. The classical literacy practice of source evaluation applies to the item once it is in view. The prior decision, the one that brought this particular item to this user out of all others, lies beyond reach. Source evaluation does not vanish as a competency. It operates downstream of a decision it cannot reach [3].

Verification-impossibility. Classical literacy assumes that the object of evaluation is stable. A text, an image, a video exists independently of any particular viewing. It can be re-encountered, compared, and corroborated by other viewers. Algorithmic personalization makes this assumption counterfactual. One user's feed differs from another user's. One user's search result differs from another user's. With generative AI in the loop, the artifact may not exist before the query and may not exist after. Verification in its classical form requires triangulation by comparison with other sources, replication of the evidentiary base, and lateral reading. Each move requires a stable object to triangulate against. As the object becomes user-specific and ephemeral, the practice loses traction [5, 51].

Agency-displacement. Classical literacy assumes that the user selects what to attend to and applies critical capacities to that selection. In an algorithmic environment, primary selection is performed by the system. The user enters a stream already assembled. The principal choice, what was included, what was excluded, what was foregrounded, what was buried, lies outside the user's intentional act. Critical capacities are still exercised. They operate on a pre-selected sample whose constitution remains beyond the user's reach. In this respect, the literate user is more vulnerable than the classically illiterate one. The literate user may apply careful judgment with confidence to a sample whose framing would require scrutiny [4].

The three mechanisms are not implementation gaps that can be closed with further training. They concern the conditions under which classical literacy was developed and the conditions that algorithmic distribution makes available. The conclusion is that the object of classical literacy has shifted. Classical literacy's competencies remain useful where they apply. What media literacy now addresses is the infrastructure that determines how content is selected and delivered. Content as such has receded as the object.

The three mechanisms also interact in ways that compound their individual effects. Source-opacity



makes verification harder because the chain of attribution required for triangulation is itself mediated by the system. Agency-displacement reinforces verification-impossibility because the user does not select the set of items against which a given claim might be compared. The comparison set is itself an output of the same recommender logic whose selections one might wish to scrutinize. The combined effect is that classical literacy operates within a kind of epistemic closure. Each competency is exercised on inputs whose constitution the competency cannot reach. When the closure goes unrecognized, the literate user may experience high confidence in evaluations conducted on a sample whose framing is the thing that would require examination. This is a structural feature of operating critical capacities within a system whose architecture is opaque to those capacities. It is not a failure of individual rigour.

The argument is not about introducing a new term. A vocabulary of algorithmic awareness, algorithmic literacy, algorithmic skill, and folk theories of algorithms exists. It has produced a substantial body of empirical and conceptual work [4]. That literature positions algorithmic competency as an addition to the classical literacy inventory. Source evaluation and lateral reading sit alongside algorithmic awareness. The conceptual move proposed here is a change in framing. It is not a change in vocabulary. Literacy is reconceived as directed at the infrastructure of mediation. Content delivered through it is no longer the object. The existing concepts, including algorithmic awareness, folk theories, and algorithmic skill, are repositioned as user-side manifestations of a phenomenon whose object is institutional and infrastructural.

The proposal is to define infrastructural literacy through depth. Infrastructural literacy is the depth at which users can engage with the layered architecture of algorithmic mediation. The definition turns on depth. It does not turn on any set of competencies that users possess. Four layers are distinguished in Figure 2.

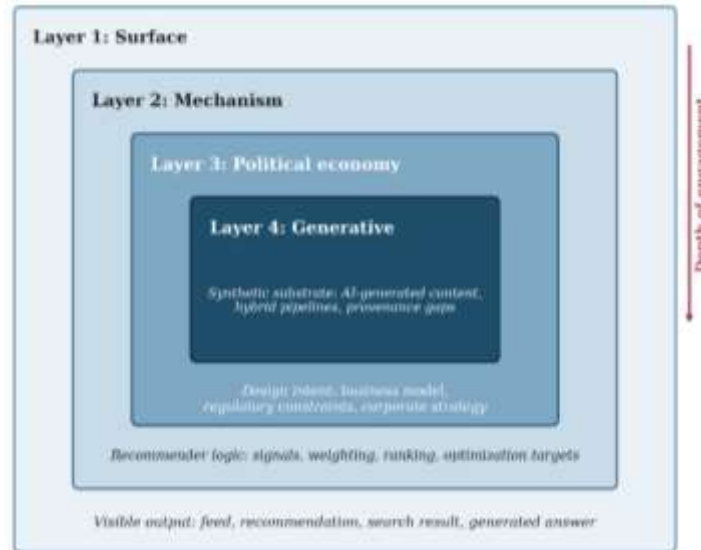


Figure 2: Four layers of algorithmic mediation and depth of infrastructural literacy

The four layers identified in Figure 2 are summarized in Table 2.

Table 2: Description of four layers of algorithmic mediation

<i>Layer</i>	<i>Object</i>	<i>What infrastructural literacy means at this depth</i>
Layer 1: Surface	The visible output: feed, recommendation, search result, generated answer	Critical engagement with content as displayed. This is the domain of classical media literacy: source evaluation, lateral reading, genre recognition.
Layer 2: Mechanism	The recommender logic: signals, weighting, ranking, optimization targets	Understanding that this output results from these inputs, that another user or the same user at another moment would see a different output, and that the system's optimization targets shape what appears.
Layer 3: Political economy	The design intent: business model, regulatory constraints, corporate strategy	Connecting what is visible with whose interests the system is optimized to serve. Attention markets, advertising structures, platform business models, and regulatory exposure all become part of the analysis.



<i>Layer</i>	<i>Object</i>	<i>What infrastructural literacy means at this depth</i>
Layer 4: Generative	The synthetic substrate: AI-generated content, hybrid pipelines, provenance gaps	Operating in an environment in which the content may have no stable pre-existing form, in which provenance is not guaranteed by the delivery system, and in which the question of whether an item exists outside one's own query becomes substantive.

The structure is hierarchical and cumulative. Each deeper layer presupposes capacities developed at the previous one. It does not reduce to them. A user able to engage at Layer 3 can perform a Layer 1 evaluation. A user confined to Layer 1 cannot perform Layer 3 analysis. The framework is diagnostic. It distinguishes degrees of literacy. It does not treat literacy as a binary attribute.

Two further notes on the framework belong here. The first note concerns the term's provenance. Infrastructural literacy draws on adjacent fields. Mattern has used the term in urban studies to describe forms of civic engagement with built and informational infrastructure. Data infrastructures scholarship has used related formulations [52]. The adoption of algorithmic mediation here builds on those usages. The relevant infrastructure is socio-technical and recommender-mediated. It is something distinct from built-environmental or strictly data-pipeline infrastructure. The second note concerns the model's scope. The layered structure does not imply that all users should reach Layer 4. The framework diagnoses where the line of engagement falls. It indicates where, given the stakes, the line might be pushed deeper. Some user populations require deeper engagement than others. Some uses and contexts do as well.

Three further properties of the framework belong on the record. The framework is comparative. It allows two regimes, two cohorts, or two educational programs to be situated relative to one another by the layer of their dominant engagement. The framework is temporal. It allows the same population to be tracked over time as its engagement depth shifts in response to education, exposure, or environmental change. The framework is integrative. It offers a structuring schema within which existing concepts can be located, rather than creating a new term in competition with algorithmic awareness, algorithmic literacy, and algorithmic skill. In the framework's vocabulary, algorithmic awareness is a Layer 2 phenomenon. Folk theories of algorithms are Layer 2 phenomena that vary in accuracy across conditions. Critical algorithm studies operate at Layer 3. Emerging work on AI literacy and generative content authentication operates at Layer 4. The framework does not replace these vocabularies. It organizes their relations.

The two regimes identified in Section 3 support different depths of infrastructural literacy at uneven

rates. Table 3 summarizes the position.

Table 3: EU and US regimes by layer of infrastructural literacy supported

<i>Layer</i>	<i>EU Paternalistic-Rights Model</i>	<i>US Libertarian-Market Model</i>
L1 Surface	Strong; curricular integration; nationally coordinated	Patchwork; state-level legislation; civil-society programs
L2 Mechanism	Institutionally supported by DSA Articles 27 and 38: transparency and non-profiled option	Dependent on voluntary platform disclosures and academic research; no regulatory floor
L3 Political economy	Structurally constrained: regulatory partnership logic creates friction with sustained critique of platform political economy	Academically stronger through critical algorithm studies; no regulatory anchoring; uneven public reach
L4 Generative	AI Act provides regulatory frame; educational integration lags behind regulatory pace	Fragmentary initiatives such as NAMLE 2024 AI literacy guidance; no systematic integration

The pattern that emerges from the table is striking. Both regimes operate well at Layer 1. Both struggle at Layers 3 and 4. The reasons differ. The EU's difficulty at Layer 3 is political. A sustained critique of platform political economy sits uneasily with the structural posture of compliance partnership. Platforms in that posture are duty-bearers integrated into the regulatory architecture. They are less amenable to systemic critique. The US's difficulty at Layer 3 is institutional. Critical algorithm studies as a scholarly field are strong. The bottom-up, patchwork educational integration provides no systematic pathway for its insights to reach mass curricula or public discourse at scale. The blind spots identified in Section 4.1 as shared are produced by structurally different mechanisms in each regime.

The observation reframes the structural blind spots. They move from a diagnosis to a research and policy agenda. The task is to develop instruments that operate at Layer 3 and Layer 4 in a form that each regime can institutionally absorb. Harmonizing the two regimes around a common deficit is not the task. They reach the deficit by different paths. The EU path needs a way to incorporate political-economy critique without compromising the compliance partnership it depends on. The US path requires institutional channels through which strong academic critique reaches the general public. Centralized mechanisms remain foreclosed under the existing regime. Neither task is impossible. Neither is trivial.



A further inference follows. When both regimes weaken at depth, the population most exposed to the limitations of either regime is the population whose effective engagement with the algorithmic environment matters most. The group includes users whose information practices reach mass scale, those who shape opinion in adjacent populations, and those whose professional roles depend on operating in highly mediated environments. The group includes communicators, educators, public officials, journalists, and corporate professionals whose work involves designing, deploying, or responding to algorithmically curated environments. Section 4.4 develops the consequences for this population.

4.3 Theoretical implications

Three theoretical implications follow. The first implication concerns the concept of media literacy itself. The concept extends from competency directed at content to a layered engagement with infrastructure. Existing concepts, including algorithmic awareness, folk theories, and critical algorithm engagement, find their place as descriptions of user-side phenomena whose object is now theorized at the institutional level. The second implication concerns the comparative-typological tradition of Hallin and Mancini. The tradition extends into the platform era. The four-dimensional model of media systems gives way, for algorithmic environments, to a five-dimensional model of media literacy regimes. The institutional logic of this five-dimensional model is no less coherent for being constructed around a different object. The third implication concerns the global typological picture. The transatlantic typology developed here connects to and complements prior comparative work along other axes. The Russia-China comparison developed in earlier work [12] articulates a different but related set of dimensions. Triangulating these analyses gestures toward a global typology of media literacy regimes. The full development of that global typology falls outside the scope of this article. Its contours are visible in the convergence of typological reasoning across cases.

A fourth implication concerns interdisciplinary dialogue. Infrastructure studies, in science and technology studies, urban studies, and information studies, have long held that infrastructures are material, institutional, and ideological at once [53]. Media studies have operated on a different terrain until recently. The reconceptualization proposed here invites convergence between the two traditions.

4.4 Implications for commerce, management, and communications practice

The argument carries consequences for the practice of commercial and corporate communications. The consequences are direct, and they speak to the readership of a commerce and management journal. They are not peripheral to the academic argument. They follow from the typology and the conceptual reframing. If media literacy regimes structure the institutional environment in which commercial communications operate, then strategic decisions taken in ignorance of that structure will underperform decisions taken with the typology in view. Campaign architectures, platform



allocations, content production pipelines, and compliance procedures all fall into the same pattern. The translation of the conceptual apparatus developed above into operational management practice is an integral test of the argument's analytical reach. It is not an optional appendix. Four implications are sketched here.

Commercial communicators have long segmented audiences by demographic, psychographic, and behavioural criteria. The framework developed here adds an axis. The axis is the depth at which audiences engage with algorithmic mediation. Audiences whose engagement remains at Layer 1 respond differently to algorithmically delivered content than audiences engaging at Layer 2 or 3. Strategies effective for the first segment rest on the premise that visibility equals attention equals consideration. They lose effectiveness as audiences become more infrastructurally literate. The pattern has consequences for influencer marketing, native advertising, and the practice of generative-AI-assisted content production. The latter field is evolving fast.

The EU's AI Act, in force since 2024 and with phased applicability through 2026, imposes obligations on AI systems used in advertising, customer interaction, and content generation. Compliance reaches beyond a back-office matter. It touches the design of recommender-mediated advertising, the disclosure of AI-generated content, and the conduct of automated customer communication [21]. The Paternalistic-Rights regime extends its institutional logic into the management of marketing operations. US marketers operating in EU markets, and global brands managing cross-jurisdictional campaigns, encounter a compliance environment that does not yield to voluntary or partnership-based approaches. Recent enforcement actions calibrate the scale of exposure. The €120 million fine on X under the DSA in December 2025, the €200 million fine on Meta under the Digital Markets Act, and the €530 million fine on TikTok under GDPR by the Irish Data Protection Commission, all in 2025, signal that EU regulatory action on platform conduct now reaches levels that shape platform economics [22].

The blind spot identified in Section 4.1 around cross-platform circulation has direct commercial expression. Brand safety frameworks were developed for individual platforms. They use platform-specific tools and controls for adjacency. The empirical reality of content circulation across platforms includes reposting, remixing, and generative recombination. Brand safety, as a platform-bound concern, underestimates exposure. Communicators who internalize the layered-infrastructure framework can build cross-platform monitoring and response capacities. Those who do not are operating with a model whose underlying assumptions the environment has already moved past.

Large employers in both jurisdictions have begun investing in internal media literacy programs. They frame them variously as compliance training, security awareness, or professional development. The



layered-literacy framework offers a structuring principle. Programs that operate at Layer 1 alone, with the framing "how to spot misinformation," deliver limited, durable value. Programs that reach Layer 2, with awareness of recommender mechanisms, and Layer 3, with awareness of the political economy of platforms, build capacities that transfer across content domains and platforms. In regulated environments such as financial services, healthcare, and energy, the case for deeper-layer programs is reinforced by regulatory exposure arising from employee-mediated information failures.

Global brands operating across both regimes confront more than two regulatory environments. They confront two different conceptions of the citizen and of the firm's relation to the algorithmic infrastructure. In the EU's Paternalistic-Rights regime, a brand's communications are subject to compliance obligations that treat its algorithmic distribution as a regulatory focus. The firm stands in relation to the regulator as much as to the audience. In the US's Libertarian-Market regime, the brand's communications operate within a market frame. Audience preferences and platform partnerships structure the strategic terrain. A communications strategy that treats these as distinct rules over the same underlying environment will lead to failures of coherence. The failures are predictable. A strategy that recognizes them as different institutional logics, structured around different conceptions of mediation, can be designed with appropriate divergences and convergences built in from the start. Practitioners of integrated marketing communication, public relations, and corporate affairs come to need an operational understanding of the typology developed here. They require it as a framework for the strategic environment. They do not require it as a theoretical embellishment.

4.5 Limitations and directions for future research

The analysis carries limits in three respects. They bear on its further development. The first respect concerns the method. The conceptual-analytical method does not yield quantitative measures of regime coherence or of the distribution of infrastructural literacy. Both lie open to empirical operationalization in survey, experimental, and ethnographic designs. The second respect concerns case scope. The typology is built around two primary cases and one deviant case. Extension to other jurisdictions, including Japan, Brazil, India, and the Russia-China axis discussed in earlier work, would test the framework's reach and refine its dimensions. The third respect concerns measurement of the proposed concept. The layered model of infrastructural literacy is a conceptual proposal that invites measurement. Developing instruments to diagnose the depth of users' engagement with algorithmic mediation and tracking how that depth varies with education, age, occupation, and platform exposure is a research program in its own right.

Several research directions follow. The first direction is measurement of infrastructural literacy. The four-layer schema developed in Section 4.2 lends itself to scale construction. Items measuring Layer 1 engagement, including source evaluation and lateral reading, can be adapted from existing media



literacy instruments. Items for Layer 2, including mechanism awareness and recognition of personalization, can build on the algorithmic awareness scales developed in recent quantitative work. Items for Layer 3, including political-economy reasoning, require new development drawing on critical algorithm studies. Items for Layer 4, including provenance reasoning and generative content evaluation, are emergent. They would gain from collaboration between media scholars and computer scientists working on content authentication. The second direction is longitudinal comparison of cohorts moving through educational programs in the two regimes. It would test the typological prediction that depth of engagement is first shaped by regime characteristics and second by individual differences. The third direction is the dynamics of hybrid configurations, exemplified by the UK case. Under what conditions do hybrid regimes drift toward one of the attractors? Under what conditions do they settle into stable, distinct equilibria? The UK is one case. Australia, Canada, and post-Brexit jurisdictional reconfigurations in other domains offer further material.

5. CONCLUSION

The European Union and the United States have constructed media literacy regimes that are coherent, self-reinforcing, and structurally distinct. The Paternalistic-Rights Model anchors regulation, supranational coordination, curricular integration, and platform compliance in a normative framework of rights and public interest. The Libertarian-Market Model anchors civil society and market action, a distributed institutional locus, patchwork educational integration, and voluntary platform partnerships within a normative framework of free speech and individual responsibility. Each regime's dimensions interlock. Partial reform within either regime carries institutional cost. The post-Brexit United Kingdom attempts a hybrid configuration. It illustrates two things at once. Elements can be transferred. Recombination generates friction at the dimensional interfaces.

Neither regime fully matches the algorithmic environment it seeks to govern. Cross-platform circulation, generative artificial intelligence, and the structural asymmetry between citizen and infrastructure lie outside what either regime's architecture handles in its current form. The path forward does not run through harmonizing the two regimes around a common deficit. They reach the deficit by different paths. The path forward runs through redefining the object of media literacy. The proposal advanced here is that the object has shifted. The object moved from content delivered through identifiable mediation to infrastructure through which content is selected, ranked, and synthesized. Infrastructural literacy, defined as the depth at which users engage with the layered architecture of algorithmic mediation, offers a framework that diagnoses where current regimes succeed, where they fall short, and what a third model might need to combine. A third model might combine the regulatory weight of the European tradition, the institutional pluralism of the American tradition, and an explicit reorientation of literacy from content to infrastructure as the proper object in the algorithmic age.



The implications reach beyond the two jurisdictions analyzed here. Other regions develop their own responses to algorithmic mediation. Latin America's emerging platform regulation, the Asia-Pacific region's diverse experiments, and African policy initiatives that draw on both transatlantic models all fall within the framework's analytical reach. The typology offered here locates such developments, compares them, and supports their evaluation. The infrastructural-literacy framework provides a vocabulary for assessing any regional response against the structural features of the algorithmic environment. Both contributions are offered as part of a research program whose full development lies ahead. The pace of change in the underlying technological and institutional environment will demand sustained attention from media scholars, policy researchers, and management theorists.

One observation summarizes the argument. Media literacy in the algorithmic age cannot be conceived as a competence that citizens possess or lack in their individual capacity. It is a property of the relation between users and the infrastructure through which their information environment is constituted. The depth at which that relation can be exercised in any substantive form is shaped, regime by regime, by institutional configurations whose internal logic this article has worked to make visible. The task ahead is intellectual and practical at once. It is to develop the concepts, instruments, and institutional capacities through which deeper engagement at this relation becomes available to the populations whose effective participation in democratic, economic, and cultural life depends on it.

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