

Presentation to FCC Commissioners
by
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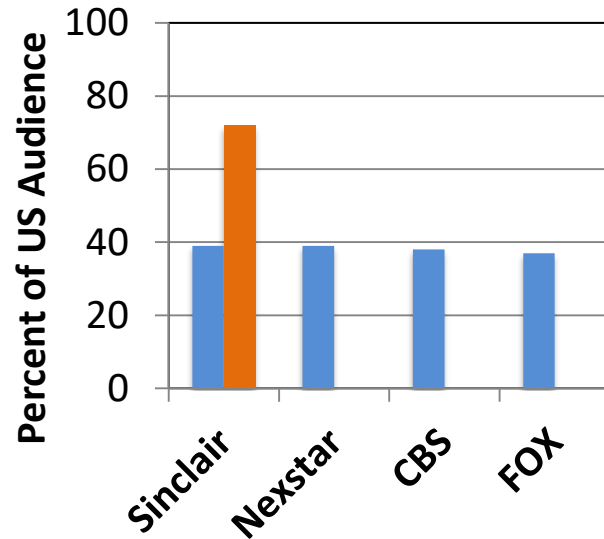
Robert Anthony

November 2017

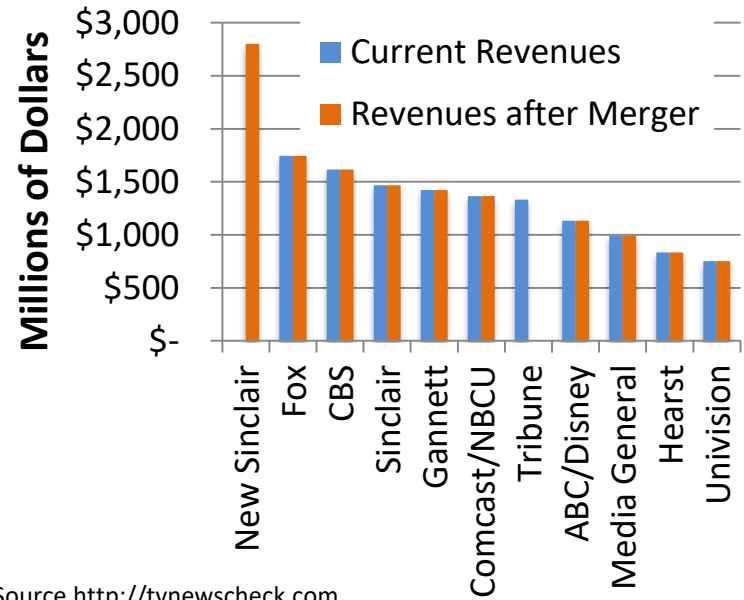
Discussion Topics

- Proposed Sinclair-Tribune Merger is Unprecedented and Dangerous
- News Audience Continues to be Dependent On Broadcast TV
- Sinclair News Services Failing The Public Interest
- Regulatory Safeguards Still Needed For Broadcast TV

Merger is Unprecedented and Dangerous



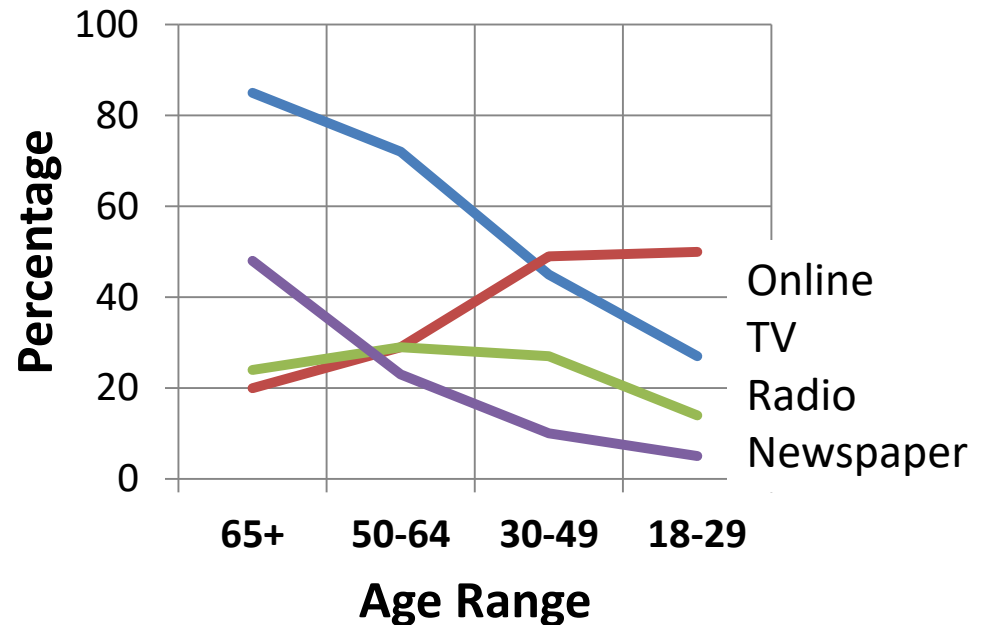
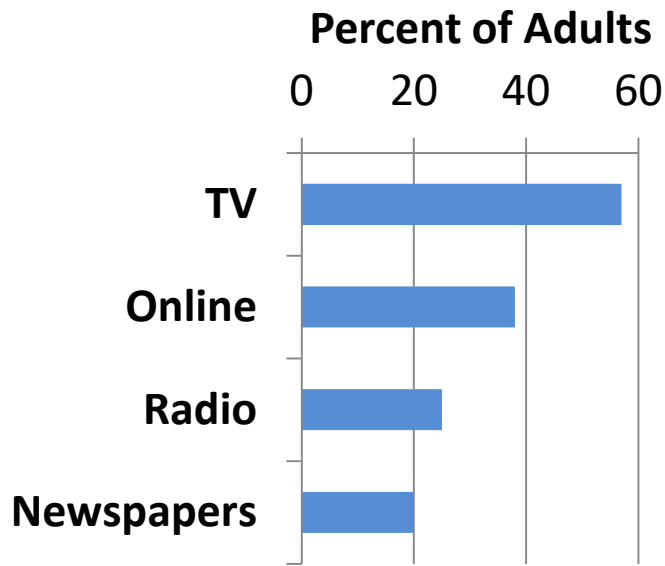
Source: the Coalition to Save Local Media



Source <http://tvnewscheck.com>

- Merged company would reach 72% of U.S. homes
- Sidecar deals further expand market coverage
- Merger provides huge competitive advantage for Sinclair
- Enables Sinclair stated goal of monopolistic domination of every local TV market
- Highly concentrated TV ownership is inconsistent with diversity of voices and localism standards for broadcast television

Most Americans Still Dependent on Broadcast Television for Local News



Source: PewResearchCenter

- Broadcast TV news especially dominant for large segment of population over 50
- Disproportionate impact on minority and economically disadvantaged populations
- 10% of U.S households have no broadband Internet access
- Internet access unavailable in 39% of homes in rural areas
- Local news programs and news anchors more trusted than cable or internet news, the latter of which is primarily derivative of broadcast news

Sinclair News Failing to Consistently Serve the Public Interest

- Centralized control vs. localism in programming and operations
 - Must-run programming overriding local journalistic and audience needs
 - Slanted editorial commentary segments (e.g. Boris Epshteyn, Mark Hyman, Scott Livingston)
 - News distortion and blurring the lines between news, commentary and advertising
 - Departures of trusted and respected local newscasters following previous acquisitions
- Free use of public airwaves carries unique responsibility for highest levels of broadcast journalism integrity
 - Compliance with Communication Act and related FCC rules is minimum requirement
- Sinclair behavior has historically not met these standards
 - Advertisements masquerading as news (Huntsman Cancer Center case alleges broadcast of lengthy unlabeled infomercials as news segments – no word on 2016 FCC investigation)
 - Selective blocking of major network news program feeds (60 Minutes 'Vietnam War' piece not allowed to air on Sinclair stations)
 - Disparagement of John Kerry Vietnam service record (Swift Boat controversy)
 - \$9M fine paid in 2016 for violation of Section 325 of Communications Act and news distortion
 - \$80K fine paid in 2001 for unauthorized transfer of control of sidecar entity
- Local broadcast television remains a critical element of political process
 - Russian active measures shaping social media and influencing U.S. election(s)
 - Broadcast television must remain a reliable source of trusted content

Regulatory Safeguards Still Needed

- Immaturity of Internet “news sources”
 - Social media content is unregulated and often co-opted to disseminate ‘fake news’
 - Evolving but immature fact and source checking by platform providers
 - Russian active measures shaping social media and influencing U.S. election(s)
 - “Open” (i.e. unregulated) standards for Facebook, Twitter, Google must not be applied to broadcast television
- Sinclair-Tribune merger outpacing transition to future model for news
 - Arcane UHF rule interpretation – pending litigation
 - Implication: Near monopoly over editorial control before clear path to news’ future
 - ATSC 3.0 technology and advertising leverage over competitors
- Public will be dependent on accurate TV and print news for years to come

HRI strongly advocates FCC denial or indefinite delay of consent to the Sinclair-Tribune merger