> to $15 to watch a game, depending on the package and the team. With each step, baseball viewership becomes more expensive and larger numbers of fans opt out.[51]

INTV believes that the Commission or the Congress should take steps today to insure that local coverage of major league baseball does not become a faded memory.

> To paraphrase genteelly White Sox co-owner Eddie Einhorn, it is plausible to contend that baseball viewing should not be unlimited and free. But it is equally plausible to argue that in return for the significant government subsidies and public patronage that are bestowed upon MLB, the political process has the right to place some constraints on MLB's propensity to commercialize. Public policy should pursue a balance between private economic interests in the gam and the importance of preserving access to our national pastime for all fans.[52]

To this end, INTV believes the FCC should report to Congress that it believes that migration is a problem in Major League Baseball. Also, that this problem is due to 1) preclusive contracts with ESPN that limit the number of nights local stations can broadcast local games; 2) cable sports channels have siphoned away games in a significant number of local markets; and 3) the trend appears to be that cable sports channels will continue to secure the rights to all local telecasts.

INTV further recommends that the FCC inform Congress that the Commission has the jurisdiction to correct many of these problems.

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[51]Zimbalist, Baseball and Billions at 156.

[52]Zimbalist, Baseball and Billions, at 164-165.

The Commission should proceed with a Notice of Proposed Rule Making suggesting the following rules.

- The current time period exclusivity contract between Major League Baseball and ESPN is contrary to public policy.
- Specific anti-siphoning rules should be enacted that will ensure that local baseball games, especially "away" games, remain on free television.

At the very least, the Commission should keep this docket open and continually monitor trends in sports migration.

III. SPORTS MIGRATION RULES WILL PASS CONSTITUTIONAL MUSTER.

Of those parties who filed comments regarding the inquiry into sports programming migration, few touched on the HBO v. FCC[53] case, and the important issues it raised. Although the HBO decision effectively removed the broad anti-siphoning rules existing in 1977, INTV posits that strong, compelling arguments in favor of sports migration regulations can actually be grounded in the Court of Appeals' opinion. For, the premises on which the Court based its decision in 1977, when viewed in light of present marketplace realities, would yield a different result in 1994. Among its conclusions, the Court found that the FCC's anti-siphoning rules were overbroad and failed First Amendment scrutiny, and that the cable industry posed neither a perceived nor viable threat to broadcasting. The Court further noted the conspicuous absence of evidence indicating the occurrence of siphoning in 1977, or its

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[53] HBO v. FCC, 567 F.2d 9 (1977).

eventuality in the foreseeable future in the event anti-siphoning rules were lifted.

In its comments, Affiliated Regional Communications, Ltd. ("ARC")[54] relied upon HBO to buttress its position that sports anti-siphoning regulations must not be imposed. ARC, however, ignores a critical factor by seeking support in HBO -- the context in which the Court based its decision. The Court addressed the issue of anti-siphoning at a time when broadcast television dominated the marketplace. Cable penetration was low in 1977, with approximately 9.8 million households, or 14 percent of the United States receiving service. The possibility of cable television's rapid growth and concomitant threat to free broadcast television was not envisioned by the Court. Broadcasting was the prevalent form of media received by the American household. The Court stated that "extension of cable service with cablecasting capability to the country as a whole did not seem possible in the immediate future."[55] In fact, the Court claimed that no harm would inure to the public interest, either in 1977 or the foreseeable future, by removing the anti-siphoning rules. Anti-siphoning rules appeared unnecessary since they neither addressed an existing problem/harm, nor one that the Court felt would materialize.

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[54] Comments of Affiliated Regional Communications, Ltd. ("ARC"), PP Docket 93-21 (Filed April 11, 1994).

[55] HBO, at 24.

Lest ARC continue to remain unaware, the marketplace has changed significantly since 1977. Today, cable has grown beyond the Court's expectations in 1977, and has emerged as a strong market participant and competitor. In contrast to the 14 percent penetration at the time HBO was decided, 90 percent of the American public can now be served by cable. Over 60 percent of Americans receive cable. Soon, cable will be available, although not necessarily affordable, to each and every household in the United States. No longer can one look at cable and not perceive a threat to the viability of free broadcast television. If the Court was deciding HBO today, the remarkable growth of cable and its dominating impact on the marketplace, along with economic considerations, would dictate a different outcome than that reached in 1977.

ARC claims that "there is no public interest justification for the reissuance of anti-siphoning regulations."[56] In making this assertion, ARC cannot rely on the HBO Court's analysis of siphoning evidence, which was limited to a few boxing matches and a stunt performance by Evel Knievel. Today, cable television has the financial ability to attract sports programming away from broadcast television, and derives substantial revenues from doing so. Almost every sport has some events on cable, and as the amount of money cable is capable of spending grows, so too will the amount of siphoning. Simple economics will force sporting events to move to

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[56] ARC, at 18.

cable. Millions of Americans still rely on free broadcast television for their informational and entertainment needs, and sports programming will thus become unavailable to those individuals who cannot afford cable television. How can ARC thereby disregard the effect siphoning has on the public interest.

ARC also neglects to realize that the public interest is far better served by airing sports on free television, than by the exclusionary contracts entered into by pay networks and the sports industry which often deprive Americans of the chance to view games or events, even those who can afford it. For if the public interest is to be served, all events should be made available to as many people as possible.

A final issue of importance presented by the HBO decision is that of the First Amendment of the Constitution. When viewed in the context of the First Amendment of the Constitution at the time of the HBO decision, the Court reached a conclusion which, when analyzed under the test and facts as they are in 1994, is incorrect.

The proper test, the one applied at the time of HBO, was that of O'Brien[57]. Since HBO, the Court has articulated several versions

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[57] United States v. O'Brien, 391 U.S. 367 (1968).

and applications of the O'Brien test[58]. In order for regulations which pertain to the rights protected by the First Amendment to survive the scrutiny of the Court, they must now pass the test prescribed by O'Brien, et al. The test, much the same as described by O'Brien, still presents two prongs that must be satisfied. First, the legislation must be narrowly tailored to advance a substantial government interest. Second, there must be a reasonable fit between the desired result and the legislation.[59]

In 1977, the substantial government interest in protecting free television could not be advanced since evidence of present siphoning activity was scarce, and future activity was merely speculative. Hence, a substantial government interest in upholding the anti-siphoning regulations could not be discerned and the first prong of the test was not satisfied. Similarly, the second prong of the test utilized at that time, could not be satisfied because the rules were determined to be overly broad, encompassing not only sports, but many other aspects of the industry, and thus not narrowly tailored to advance the public interest at stake.

When viewed under the test and under the facts as they exist in 1994, a far different result may be reached. The first prong

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[58] Board of Trustees of State University of New York v. Fox, 492 U.S. 469 (1989), Ward v. Rock Against Racism, 491 U.S. 781 (1989), City of Renton v. Playtime Theatres, Inc., 475 U.S. 41 (1986).

[59] Fox, at 480.

is now easily satisfied. The fledgling industry that was cable in the mid-1970s is now a media giant. Siphoning has become a reality and must be checked in order to safeguard the public interest in free television. Additionally, regulations aimed specifically at sports are more narrowly tailored than the overly broad regulations of 1977. As for the second prong, furthering the public interest by implementing regulations targeting sports produces the necessary fit between the desired result and the legislation. Both prongs being satisfied, the regulations may now survive the Court's scrutiny.

INTV believes that the evidence presented throughout the sports siphoning proceeding demonstrates that regulations dealing with sports siphoning would pass the analysis of O'Brien. More importantly, rules restricting preclusive time exclusivity contracts would most certainly pass muster. Such regulations are not siphoning rules *per se* -- cable sports channels would remain free to bid for sports events. Such rules would only prevent a cable channel, through contracts with Major League Baseball and college football conferences, from denying local broadcasters the ability to televise games that cable sports channels have decided not to cablecast. Indeed, it is doubtful whether an O'Brien analysis would apply to regulations governing preclusive exclusivity contracts.

IV. NBA BASKETBALL

INTV has yet to see an explaination of why the Phildelphia Severty-Sixers games left WPHL-TV. The cold hard fact is that PRISM simply outbid the station for the rights to these games. The station's advertising base simply could not support a higher bid.

Lest anyone forget the potential for additional sports migration, the recent decision of the Denver Nuggets should give the Commission pause. The away games of the Denver Nuggets regularly appear on KWGN in Denver. Home game coverage has been provided by the Prime Sports Network on basic cable. However, the Nuggets and PSN have now decided to move the Nuggets' home playoff games to pay-per-view. Each game will cost from $13-16 dollars.

The method employed in moving the games to pay-per-view is simply contrary to the public interest. PSN has arbitrarily drawn a 35 mile circle around Denver. Fans living within the circle can only access the game from pay-per-view. Fans living outside the circle will see the game on their regular PSN basic service. PSN estimates that a profit can be made if only two percent of Denver's cable subscribers purchase the pay-per-view games.[60]

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[60] See Denver Post April 19, 1994 at 1D; Rockie Mountain News, April 19, 1994 at 1B.

Interestingly enough PSN claims that it cannot keep games on its basic service because advertising revenues are insufficient to support higher rights fees.

> ...[A]dvertsing budgets are locked in and current advertising revenue alone will not cover the cost of broadcasting the home games.[61]

This situation demonstrates that sports migration will continue at the local level. In may be localized and therefore not get national attention. Nevertheless, migration is occuring at the local level.

V. CONCLUSION

The data and analysis presented in this proceeding demonstrate that migration is a problem, especially with respect to college football and Major League Baseball. Accordingly, the FCC should revise the conclusions reached in its Interim Report. Congress should be made aware of this situation.

Moreover, the FCC should retain jurisdiction and keep this proceeding open. To this end, the FCC should issue a Notice of Proposed Rule Making. INTV believes the Commission should propose rules that:

- Prohibit the preclusive exclusivity contracts that exist in college football and Major League Baseball.
- Re-establish overall sports siphoning rules. Such rules should insure that sporting events currently seen on

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[61] Rockie Mountain News, April 19, 1994 at 5B.

over-the-air television stations do drop below existing levels.

After giving so much to professional sports and college programs, the American public should retain the ability to see sporting events on local over-the-air television.

Respectfully submitted,

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April 26, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554

In the Matter of	)	
Implementation of Secton 26 of	)	
the Cable Television Consumer	)	**PP Docket No. 93-21**
Protection and Competition Act	)	
of 1992	)	
	)	
	)	
Inquiry into Sports Programming	)	
Migration		

APPENDIX
FURTHER NOTICE OF INQUIRY REPLY COMMENTS
BY THE
ASSOCIAITON OF INDEPENDENT
TELEVISION STATIONS, INC.

David L. Donovan
VP/Legal &
Legislative Affairs
Association of Independent
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1320 19th Street, NW
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April 26, 1994

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ANDREWS OFFICE PRODUCTS CAPITOL HEIGHTS, MD (K)

A

COLLEGE FOOTBALL GAMES BROADCASTS

ANALYSIS

SEPTEMBER-DECEMBER
1984-1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

EXECUTIVE SUMMARY

The purpose of this study is to show that through time (1984-1993) the college football games televised by the local television stations (local games broadcasts) throughout the Country, have not only decreased, but also that this decrease is directly dependent on the increase of the college football games televised by the cable networks (cable games broadcasts).

Data for the study is based on college football games reported in local newspapers and TV Guide's Saturday television sports listings for the nine TV markets shown on Exhibit 2. The selection of the markets is based on the fact that they form a representative sample, as long as they are the home markets of 6 Pac-10 and 6 Big-10 teams. The data tabulation and analysis has been based on the number of the broadcasts in each market. We believe that this approach is more accurate, as long as it shows the specific trends in the selected TV markets and also the summarized results in the broadcasts available to the public in non-network, network and cable channels.

The summarized results presented in the graph (Exhibit 4) show the trends in the network, local and cable television broadcasts, which support the conclusion of the study that, over all, over-the-air coverage of college football has declined significantly. More importantly, there has been a significant decline in local, non-network college games covered by local television stations.

Further statistical analysis (Exhibit 5) reveals that the number of games' broadcasts appearing on cable channels is directly related to the decline in local games' broadcasts appearing in local television stations. The results of the analysis show that the cable games' broadcasts are negatively correlated with the local games broadcasts and in fact, they are one of the most statistically significant factors.

The extracted regression model explains the past with a high degree of accuracy. Also, the analysis shows that in the event of an increase in the number of the cable games' broadcasts, there is strong evidence there will be a decrease in the number of local games broadcasts.

Furthermore, the larger the increase of the cable games broadcasts, the higher the probabilities and the magnitude of the decrease of the locals. Accurate predictions about the future trends in the local games broadcasts can be well based on this conclusion, which also supports the findings of the analysis.

##

DATA COLLECTION &
DATA TABULATION ANALYSIS

The whole analysis has been chosen to be based on the number of the broadcasts rather than the number of college football games. I believe that this approach leads to more accurate results, as long as it allows us to make conclusions for each television market, but it also allows us to search for specific trends in the summarized results for the nine TV markets.

For that purpose, I collected the Saturday Sports listings from the local newspapers and TV Guides, for the time period September-December for the years 1984-1993. The summarized spreadsheet consists of 9329 broadcasts, which represents the total number of broadcasts for the nine television markets, which appear in Exhibit 2. The chosen format of the spreadsheet is the following (Exhibit 3):

1. **Column 1 (Market)**: Shows the television market in which the game was broadcast.

2. **Column 2 (Year)**: Shows the corresponding year of the game and the related telecast.

3. **Column 3 (Station)**: Shows the name (call letters or cable programmer's name) of the station broadcasting the game. In case there were more than one, all names have been printed.

4. **Column 4 (Program)**: Shows the game broadcast. Great care has been taken in order not to duplicate games and also to find the right teams of the games broadcast. Due to the publication time constraints, sometimes the exact game was not available. In that case, the title "Regional Games" or "College Football" or a combination of possible games was used by the newspaper(s). We followed exactly the same format.

5. **Column 5 (Time)**: The time the game was broadcast. Great care again has been taken in order not to include previous-day taped games, or same day repeated games. Whenever the game was recorded as delayed, taped or repeated in the newspaper(s), the symbols D,T,R respectively have been used.

6. **Column 6 (# of Telecasts)**: The number of the available telecasts.

7. **Column 7 (Broadcast type)**: Cable, Network or Local, depending on the Station that was broadcasting the game. In case the game was televised live over-the-air and on cable, it is recorded as local or network, depending on the nature of the coverage. Whenever a network affiliated station was broadcasting a local game that was not available live on any network or cable, the game is recorded as local. Whenever a game was broadcast live on a station and taped on other(s), the game is characterized based on the nature of the Station and the related coverage.

8. **Column 8 (Date)**: The date which the game was televised.

Finally, great care has been taken in order to exclude from the study stations and programmers which ADI does not cover at least a very large part of the given TV market.

A graphical representation of the results is given for each market and for the summarized results for all nine television markets (Exhibit 4).
##

STATISTICAL ANALYSIS

EXPLANATION OF THE METHODOLOGY

A graphical representation through time of one or more variables (in our case, cable games and local games) does not provide us with any information regarding a possible cause and effect relationship between them. The dependency between two or more variables can be shown through an application of advanced statistical techniques. One of them is the Multiple Linear Regression Analysis. This method, combined with the Normality, Randomness and Autocorrelation tests can lead us to useful conclusions regarding the behavior of the dependent variable as a function of the independent variable(s).

Multiple Linear Regression Analysis: The basic assumption here is that the dependent variable Y ("local" games) is decreasing exponentially over time. As long as this is not always the case, data points lying off this line are recorded with their deviation from the same line. For example, if in 1985 we were expecting (according to the Linear Function) 200 "local" games and finally we had 237, the deviation, in this case, is 37. The purpose of the Regression Analysis is to minimize these deviations, by choosing the most appropriate independent variables (Cable, etc., games) that explain a high percentage of the variance of the dependent variable, and come up with a linear function that eliminates it. The computerized Regression Analysis model very carefully selects the independent variables that best fit the function based also on their significance on the dependent variable.
After the independent variables are selected, the model give us the multi-linear function of the dependent variable on the independent variables, the percentage of the variance explained by the model, the significance of the independent variables on the dependent variable, and the Standard Deviation. For example, an R-Squared-adjusted of 97% shows that 97% of the variance of the dependent variable has been explained by the model, absolute values of t-ratios (preferably above 2) shows the magnitude of significance of the independent variables on the dependent variable and Standard Deviation of the residuals shows us the magnitude of the difference of the actual results compared with these extracted by the model. All criteria described above must be satisfied, and none of them in isolation is enough for selecting the regression model(s).

Autocorrelation Test (Durbin Watson Statistic) - Randomness test - Normal probability distribution test: The procedure described above does not stop on the exploration of the model. The residuals (expressing the variance of the dependent variable based on the extracted regression model) must be:

1. Not autocorrelated. Signs of positive or negative autocorrelation (tendency of the points to be associated) in the consequent years, will pose a question as to the validity of our results.

2. In a Random sequence. "Random" means lack of persistent pattern in the sequence of the data. The essence of randomness is unpredictability of the sequence. In our case, a message that "the test is significant at 0.5128" means that for a statistically random process, over 51.28% of the time we would see a bigger discrepancy than the one observed here. In a process of forecasting or explaining phenomena, statistically random data are very important for the validity of the results. In terms of a statistical analysis, the sample is acceptable for numbers higher than 0.10 (10%).

3. Normally distributed. Normality has the statistical meaning in this case, and it means a particular shape of distribution that can arise when many small additive sources of

variation contribute independently to the observed quality measure for the "finished" unit. There are a lot of types of distribution (Poisson, Student, etc.) but the Normal is the most common one and very easily manipulated. For example, under the status of Normal Distribution, a standard deviation of the residuals equal, let's say, to 1, means that if we forecast that the "local" games will be 55 for the year 1994, we are 67% sure that the (approx) actual number will be between 54 and 56, 95% sure that the actual number will be between 53 and 57, and about 99% sure that the actual number will fall between 52 and 58. Of course, we can not make the same statement if the residuals are not random and not normally distributed.

A regression model that satisfies every restriction described above, without any of them being in the limits, has the advantage of the high stability and accuracy. That means, that even if we made small mistakes in the data recording, the total picture of the extracted final results will not change, i.e. a negative sign in the regression equation will remain negative and the standard error will remain almost the same.

One of the main assumptions that needs to be satisfied is that there is truly a possible cause and effect relationship between the dependent variable and the independent variable(s). A regression model is strictly based on numbers and if there is no evidence that such a relationship exists, there is absolutely no way to show the opposite, at least in a scientifically acceptable manner.

It is also very important to recognize the shape of the functions and their possible mathematical representations. A linear regression model is based on the assumption that the relationship(s) between the dependent and the independent variable(s) is linear. If the real relationship is non-linear, then we have to find a way (if this is possible) to apply the analysis to linear functions, otherwise the standard errors will be high (for example, if the function Locals=f(time) is exponential, then the ln(Locals)=f(time) is linear).

##

STATISTICAL ANALYSIS
EXPLANATION OF THE VARIABLES USED
(Exhibit 5, pages 15-19)

The purpose of a regression analysis is to show us which are the most important independent variables that are influencing the dependent variable. The results of the extracted model are acceptable if and only if all the restrictions described in the previous pages are fulfilled. Independent variables that do not play any important role in the behavior of the dependent variable are preferably excluded by the model, as long as their contribution in explaining the behavior of the dependent variable is very low. In terms of statistical analysis, one of the first stages is the application of autoregression analysis. In other words, we regress the dependent variable on its previous years values (lagged values). Because parsimony is one of the most important concepts in statistical analysis, we are trying to keep the model as simple as possible. One of the simplest models is the one that can give us accurate forecasts based only on the previous years values of the dependent variable only. Because this is not always the case, we also examine other variables, which we have reasons to believe that they also influence the dependent variable.
Column C1 represents the years 1984-1993.
Columns C2, C3, C4, C5, C20, C21, are the values of network, local, cable, ESPN, network+local and total games broadcasts respectively.
Columns C6-C14, C19-C24 are the lagged values of the variables described above. We use them in order to see whether the previous years' results are influencing the future trends.
Columns C15-C18, C25-C38 are the seasonal indicators. Sometimes, an event that appears in a cyclical way (i.e. the Olympic games), can influence the behavior of the variables. Most of the times we are not able to determine the nature of this event from the beginning. For that reason, we are including these independent variables in the model as indicator variables, which practically indicate the existence of these events.
Columns C41, C51, C53: Sometimes the variables are increasing or decreasing exponentially. In that case, it is preferred to work with logarithms. Columns C42-C44, C52, C54 represent the lagged values of columns C41, C51, C53 respectively.
Columns C58-C60 are the results of the regression model. In column C58 we have the values for the local games broadcasts as if all the values of the years 1984-1993 had been predicted by the model. In C59 we have the residuals, a measurement of the deviation of the actual values compared with the fitted values. The general rule here is ACTUAL=FITTED+RESIDUALS. Finally, in column C60 we have the standardized residuals.

##

ANALYSIS OF THE RESULTS
(Exhibit 5)

The method used is Multiple Linear Regression Analysis and the results are the following:

The College Football Games covered by Local TV Stations are dependent upon and negatively influenced by the College Football Games covered by the Cable TV Programmers. In other words, an increase (over time) in the "Cable" games, have had a direct negative effect on the "Local" games. And according to the given information, we are observing:

i) a decrease in the "Local" games, caused by a (possible) increase of the "Cable" games in the same year. Furthermore, a linear increase of the cable games broadcasts is correlated with an exponential decrease in the number of locals. Locals are expressed in logarithms and cables in real numbers (this also explains the small coefficient in front of the cable games broadcasts).

ii) a decrease (as a time effect) of the "Local" games

These conclusions are very well supported by the Model, because:

I. Standard Errors and P-Values are very low. Given the Independent Variables, we can assign roughly 99% probability that the corresponding logarithm of the standard error of the "Local" games (total for 9 TV Markets) would be within plus or minus 0.28263 of the prediction given by the Model ($e^{0.09421} = 1.0988$, where 0.09421 is the standard error of the residuals. As long as the model is based on the logarithmic expressions of the real values, we have to inverse the extracted numbers, using the base of the natural logarithms "e". For 99% probability, we are using the number 0.09421 (standard error) * 3 = 0.28263). It is obvious that the standard error is very low compared with the real values. This fact is very important for the accuracy of our model, arguments and forecasts.

II. All t-ratios that are (in absolute values) above 2, show us that the related variables are statistically significant.

III. The fact that the p-Value for the seasonal indicators L2 and M1 is above 5% does not influence our results, as long as the related t-ratio is above 2.

IV. The R-sq Adjusted is very high. About 97% of the Variation of the Dependent Variable (local TV games broadcasts) has been explained by the Model.

V. The Durbin-Watson statistic number (= 2.05) shows us that we do not have any problems with Autocorrelation.

VI. The Randomness (Alpha) test and the Normal Distribution (IChart-page 14) test have shown us that our Dependent Variable is random and normally distributed and therefore, it is in the state of Statistical Control Process.

As we can observe from the model, there are also other variables that influence, the local games broadcasts. These variables have a cyclical effect on the local games broadcasts and it is a matter of good insight to understand and find their nature and their meaning.

One of the main advantages of this model, is the fact that the standard error is very low. In other words, we are able to predict in a narrow range the number of the local football games broadcasts for the following years and most importantly, the trends. This fact is very supportive to the argument that the cable games broadcasts are negatively correlated to the locals. Table 1 in the following page, shows very explicitly that the regression model described above explains almost perfectly the past and it mathematically proves the importance of the cable games broadcasts increase on the decrease of the locals.

##

SOME FURTHER COMMENTS ON THE STATISTICAL ANALYSIS

The more the cable games broadcasts have been increasing, the more the locals have been decreasing, in an exponential way. **The fact that there is a negative sign in front of the cable games in the regression equation and that increases of cables have always led to decreases of predicted values of locals, combined with the high accuracy level of the predicted by the model values, due to the small standard error, is what makes our argument really strong and valid.** Also, in case we have a future decrease in the number of the cable games broadcasts, the chances of an increase in the locals are very high .

In order to show the impressively high level of the accuracy of the model in terms of explaining the past decreases of the locals (mainly caused by the increases of the cables), we can apply it to the previous years data. The results are shown on the following table:

Table 1

YEAR	CABLE GAMES (TOTAL BRDTS)	LOCAL GAMES (TOTAL BRDTS)	PREDICTIONS FOR LOCAL GAMES BRDTS, BASED ON THE MODEL	DEVIATION
1984	433	162	179	17
1985	447	237	232	-5
1986	428	225	220	-5
1987	480	124	113	-11
1988	520	115	112	-3
1989	597	83	82	-1
1990	682	72	73	1
1991	682	55	53	-2
1992	600	52	58	6
1993	616	42	41	-1
ABS TOTAL		1176		52

STANDARD ERROR: 0.09421 (LOGARITHMIC)

As we can see from the table above, the predicted values have been very close to the real, and the error has been less than 5% on average.

As a conclusion, we can say that it is scientifically proven that cable games broadcasts are negatively correlated with the local games broadcasts.

The next step of this project, is to collect the information for eight more TV markets and apply a similar analysis to the total results.

##

EXHIBITS

EXHIBIT 1

COLLEGE FOOTBALL BROADCASTS

SOURCES OF INFORMATION
(1984-1993)

1. TV Guide, for all the markets analysed
2. The Cedar Rapids Gazette, Cedar Rapids, Iowa
3. Telegraph Herald, Dubuque, Iowa
4. The Chicago Tribune, Chicago, Illinois
5. The Columbus Dispatch, Columbus, Ohio
6. The Detroit News and Free press, Detroit, Michigan
7. The Register Guard, Eugene, Oregon
8. The Patriot, Harrisburg, Pennsylvania
9. The Lansing State Journal, Lansing, Michigan
10. The Los Angeles Times, Los Angeles, California
11. The San Francisco Chronicle, San Francisco, California

EXHIBIT 2

COLLEGE FOOTBALL GAMES BROADCASTS

TV MARKETS LIST

1) Los Angeles, California
2) San Francisco-Okland-San Jose, California
3) Eugene, Oregon
4) Harrisburg-York-Lancaster, Pennsylvania
5) Lansing, Michigan
6) Detroit, Michigan
7) Columbus, Ohio
8) Chicago, Illinois
9) Cedar Rapids-Waterloo-Dubuque, Iowa

EXHIBIT 3

LOSANG1.XLS

OS ANGELES	1988	PRIME TIC	USC vs OR S	3.30 p.mD	1	CABLE	29-Oct
LOS ANGELES	1988	PRIME TIC	CAL vs ARIZ	6.30 p.m	1	CABLE	29-Oct
LOS ANGELES	1988	PRIME TIC	CS LB vs HAWAII	10.30 p.m	1	CABLE	29-Oct
LOS ANGELES	1988	TEMPO	E ILL vs SW MISS	12.30 p.m	1	CABLE	29-Oct
LOS ANGELES	1988	TEMPO	HAWAII vs SD S	5.30p.mT	1	CABLE	29-Oct
LOS ANGELES	1988	WTBS	MISS vs LSU	9.30 a.m	1	CABLE	29-Oct
LOS ANGELES	1988	WGN	N DAM vs NAVY	9.00 a.m	1	CABLE	29-Oct
LOS ANGELES	1988	WGN	RICE vs N DAM	9.00 a.m	1	CABLE	5-Nov
LOS ANGELES	1988	ESPN	YALE vs CORN	9.30 a.m	1	CABLE	5-Nov
LOS ANGELES	1988	ESPN	OKL vs OKL S	1.30 p.m	1	CABLE	5-Nov
LOS ANGELES	1988	ESPN	FLOR S vs S CAR	5.00 p.m	1	CABLE	5-Nov
LOS ANGELES	1988	WTBS	GEOR vs FLOR	9.30 a.m	1	CABLE	5-Nov
LOS ANGELES	1988	PRIME TIC	CAL vs USC	3.30 p.m	1	CABLE	5-Nov
LOS ANGELES	1988	TEMPO	TOL vs E MICH	9.30 a.m	1	CABLE	5-Nov
LOS ANGELES	1988	TEMPO	CS LB vs HAWAII	5.00 p.m	1	CABLE	5-Nov
LOS ANGELES	1988	ESPN	PITT vs PEN S	1.30 p.m	1	CABLE	12-Nov
LOS ANGELES	1988	ESPN	WYOM vs HOUS	5.00 p.m	1	CABLE	12-Nov
LOS ANGELES	1988	WTBS	LSU vs MISS S	9.30 a.m	1	CABLE	12-Nov
LOS ANGELES	1988	PRIME TIC	FR S vs N LV	3.30 p.m	1	CABLE	12-Nov
LOS ANGELES	1988	PRIME TIC	STANF vs UCLA	7.00 p.m	1	CABLE	12-Nov
LOS ANGELES	1988	TEMPO	DPAU vs WAB	10.00 a.m	1	CABLE	12-Nov
LOS ANGELES	1988	TEMPO	E MICH vs B GR	5.00 p.m	1	CABLE	12-Nov
OS ANGELES	1988	ESPN	B COL vs ARMY	4.30 a.m	1	CABLE	19-Nov
OS ANGELES	1988	ESPN	YALE vs HARV	9.30 a.m	1	CABLE	19-Nov
LOS ANGELES	1988	ESPN	SYRAC vs W VIR	3.00 p.m	1	CABLE	19-Nov
LOS ANGELES	1988	ESPN	MIAMI vs LOUIS S	6.00 p.m	1	CABLE	19-Nov
LOS ANGELES	1988	PRIME TIC	WASH vs WASH S	4.00 p.m	1	CABLE	19-Nov
LOS ANGELES	1988	PRIME TIC	CS LB vs FR S	10.30 p.m	1	CABLE	19-Nov
LOS ANGELES	1988	TEMPO	LEH vs LAF	9.00 a.m	1	CABLE	19-Nov
LOS ANGELES	1988	TEMPO	C MICH vs MIOH	5.00 p.m	1	CABLE	19-Nov
LOS ANGELES	1988	ESPN	FLOR vs FLOR S	4.30 p.m	1	CABLE	26-Nov
LOS ANGELES	1988	WTBS	GEOR T vs GEOR	9.30 a.m	1	CABLE	26-Nov
LOS ANGELES	1988	PRIME TIC	N LV vs CS LB	8.00 p.m	1	CABLE	26-Nov
LOS ANGELES	1988	PRIME TIC	AIR F vs HAWAII	11.30 p.m	1	CABLE	26-Nov
LOS ANGELES	1988	ESPN	PITT vs SYRAC	1.30 p.m	1	CABLE	3-Dec
LOS ANGELES	1988	ESPN	BYU vs MIAMI	5.00 p.m	1	CABLE	3-Dec
LOS ANGELES	1988	PRIME TIC	OR vs HAWAII	11.00 p.mD	1	CABLE	3-Dec
LOS ANGELES	1988	ESPN	NCAA DIV II CHAM	8.00 a.m	1	CABLE	10-Dec
LOS ANGELES	1988	ESPN	W MICH vs FR S	1.00 p.m	1	CABLE	10-Dec
LOS ANGELES	1988	ESPN	NCAA DIV I CHAM	7.00 p.m	1	CABLE	17-Dec
LOS ANGELES	1989	ESPN	MARYL vs N CAR S	12.30 p.m	1	CABLE	2-Sep
LOS ANGELES	1989	ESPN	LSU vs TEX	3.30 p.m	1	CABLE	2-Sep
LOS ANGELES	1989	PRIME TIC	SD S vs AIRF	11.00 a.m	1	CABLE	2-Sep
LOS ANGELES	1989	PRIME TIC	STANF vs ARIZ	7.00 p.m	1	CABLE	2-Sep
OS ANGELES	1989	PRIME TIC	TUL vs HAWAII	10.30 p.m	1	CABLE	2-Sep
S ANGELES	1989	WTBS	S MISS vs FLOR S	9.30 a.m	1	CABLE	2-Sep
LOS ANGELES	1989	SPRTSCH	AKRON vs VIR T	9.00 a.m	1	CABLE	2-Sep