April 17, 2002

Marlene H. Dorch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: MM Docket Nos. 01-235, 96-197

Dear Ms. Dorch:

Accompanying this letter is an *ex parte* submission in the above captioned docket. This submission is a report by Professor Andrew Calabrese of the University of Colorado School of Journalism commissioned by Media Access Project on behalf of its clients. Professor Calabrese addresses the content of two non-entertainment programming studies submitted by Belo, Corp. and by Media General. In addition, Professor Calabrese addresses several articles from academic literature cited by the National Association of Broadcasters and the Newspaper Association of America.

In accordance with 47 C.F.R. §1.1206(b), I am submitting an electronic copy of this report today.

Sincerely,

Cheryl A. Leanza
Deputy Director

COMMENTS ON THE BELO AND MEDIA GENERAL STUDIES, AND AN ANALYSIS OF THE DIVERSITY QUESTION

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The FCC's Notice of Proposed Rule Making on media cross-ownership, released on September 20, 2001, seeks comment "on the appropriateness of either retaining or eliminating entirely our newspaper/broadcast cross-ownership rule."[1] The Commission's "twin goals" for the creation of those rules twenty-five years ago were to promote diversity of viewpoints and economic competition. On the basis of these goals, the question that the studies by Belo and Media General ostensively are aimed at answering is this: *Are viewpoint diversity and economic competition positively or negatively affected* *<u>at the local level</u>* *by newspaper/broadcast cross-ownership?* My conclusion from analyzing these two studies is that they do a very poor job of responding to this question. They reflect several limitations, not only with reference to the Commission's main question, but also with respect to many of the ancillary questions raised in the NPRM. This report first looks at the two studies to consider their validity and reliability, and then offers a more general set of observations and recommendations that may be helpful in addressing the broader range of important questions posed by the Commission.

The Belo and Media General Studies

1. *Cross-Media Impact:* A major shortcoming of both studies is that they focus exclusively on broadcast programming and say nothing about the impact of cross-ownership on newspaper content, the implication being that the Commission should be concerned only with the impact on the broadcast industry and its audiences.

2. *"Viewpoint Diversity":* The two studies, which rely on nearly identical types of data, imply that a valid operational definition of viewpoint diversity is relative *quantities of non-entertainment programming* in convergence and non-convergence markets. This gross measure says nothing in response to the question of viewpoint diversity. At best, this measure is an indicator of the quantitative impact of convergence. However, the question of viewpoint diversity is inherently qualitative. These studies tell us that more talking is going on, but we are not told either that more people are talking, who hires and fires the people doing the talking, or that people are talking about a wider range of things. The Commission's concept of viewpoint diversity should be less crude than the one advanced in these two studies. Needless to say, neither study even touches on the impact of convergence on viewpoint diversity in the newspapers of the markets that were studied.

3. *Hawthorne Effect:* There is no reason to question the reliability of the measurements, or the ethics of the researchers who conducted the studies, but

there is no doubt that the firms sponsoring the studies had vested interests in the research outcomes. Consequently, they could easily have been inclined to display "good behavior" in terms of program line-ups in the convergence markets at times when the measurements were taken. Although it would now be impossible to verify if and how this might have occurred, there is reasonable facial evidence to suggest that the results have been confounded by what is known as the "Hawthorne effect." The Hawthorne effect is present in social scientific studies when people (in this case, possibly station owners, managers and program executives) behave differently when they are aware that they are being observed. Typically, the tendency is to behave in what are perceived as socially desirable ways, for example, by programming heavier schedules of "non-entertainment" fare, especially news and public affairs shows. Had the studies been conducted independently (i.e., not commissioned by parties lobbying for the removal of the bans), over a longer period of time, perhaps years, there might be a more solid basis for confidence in the validity of the findings.

4. *Sampling Methods and Statistical Significance:* In the reports of these studies, no indication is given of the method or criteria used in selecting the sample weeks (Belo: November 23-29, 1997; Media General: November 13-19, 2001). The studies also report no tests of statistical significance in their comparisons of convergence and non-convergence markets, meaning we have no basis for concluding that the differences are due to anything other than chance (rather than being due to the fact of convergence or non-convergence).

5. *"Non-Entertainment Programming":* The selection of the category of "Non-Entertainment Programming," in these studies, is a dubious one. While this category is in line with one of the categories the FCC used to evaluate television programming prior to deregulation in 1984, it is not a good selection. This study could have just as easily selected the more relevant news and public affairs category. A study looking at news and public affairs programming under the FCC's old standards would be much more useful than the present studies. In the FCC's NPRM, it cites the 1945 U.S. Supreme Court case *Associated Press v. United States* and states that the multiple ownership rules were designed to promote viewpoint diversity to further "the welfare of the public" through "the widest possible dissemination of information from diverse and antagonistic sources."[2] Through the selection of the broad non-entertainment programming category, the studies miss the clear hierarchy of what should be considered central and peripheral to such goals. Are Martha Stewart and Bob Vilas on a par with Tom Brokaw and Ted Koppel? The former two shows would be better characterized as "Non-Fiction Entertainment Programming," and some children's programming would fall under the category of "Entertainment." Although we do not have an opportunity to give closer scrutiny to what programs have been put into the category, it is very likely that the use of these categories grossly exaggerates what would be found if the narrower definition were used. Moreover, the FCC should consider reanalyzing and updating its old programming categories if it intends to rely upon them in making policy judgments.

In sum, the Belo and Media General studies are of questionable relevance and validity in any attempt to help the Commission find an answer to its main question: *Are viewpoint diversity and economic competition positively or negatively affected* *<u>at the local level</u>* *by newspaper/broadcast cross-ownership?* At best, the findings are a testimony to the poor quality of argument that the broadcast industry has been able to offer in attempting to justify the elimination of the rules. It would be cynical to use such data to justify repealing the cross-ownership rule. There is nothing in these two studies that says the Commission's original intention was misplaced, or that the conditions existing today offer any less of a justification for the continuation of the cross-ownership rule. My hope is that the Commission has other, more compelling sources from which it can draw in reaching its decision. Reflecting on many of the important unanswered questions raised in the Commission's NPRM of September 13, 2001, I have outlined the following summary of additional research considerations.

DIVERSITY AND COMPETITION

What Kind of Diversity?

As stated in its NPRM, "the Commission historically has sought to promote its goal of *viewpoint diversity* indirectly through structural regulation, such as ownership rules."[3] But the Commission also offers distinctions between viewpoint diversity, ownership diversity, and content diversity.[4] Based on my reading of the NPRM, and of various reports and comments submitted by interested parties,[5] there is no consensus on what standard of "diversity" should be applied to measure whether the goal is being adequately achieved by broadcasters, newspapers, or combinations thereof. As the

Commission notes, "The relationship between ownership diversity and viewpoint diversity is the subject of considerable debate."[6] The Commission further notes that there are competing views on how "divergent viewpoints on controversial issues," which are "essential to democracy," might originate. On the one hand, it is argued that such diversity can only be achieved by competing media owners, while on the other hand, advocates for removal of the cross-ownership ban argue that diverse viewpoints can be presented more effectively in a market where there is greater ownership concentration. Given the unsettled nature of this political-economic debate, how can precise and accurate research possibly be brought to bear on the diversity question?

Monopoly as Diversity

The novel argument that appears in the diversity debate, referenced above, is the counter-intuitive one that "the greater the concentration of ownership, the greater the opportunity for diversity of content."[7] The theory goes like this: Independently owned media outlets in a local market are inclined to gravitate towards producing content that competes for the largest chunk of available audience (the "greatest common denominator"), arguably ignoring and marginalizing tastes and interests that do not fit into the mainstream. The result will be that less diverse content is available. By contrast, the theory says, allowing greater ownership concentration within and across media will make it possible for such firms to serve a wider array of tastes and interests, and the incentive will be stronger to fill all market niches.[8] But this speculative argument flies in the face of all that has been offered as justifications for opposing monopolies, namely, that due to the lack of competition, high ownership concentration of the sort proposed in the current NPRM is the cause of a lack of responsiveness to market demand. Recognition of this intrinsic inadequacy of monopolies was used to justify the break-up of AT&T in the 1980s, the reasoning being that innovation in products and services had been stymied by lack of competition. What incentive would there be for a content monopolist (especially in a local market) to be responsive to “all substantial interests” if some of those interests ran counter to those of the monopolist who controls the flow of local information, its quality, quantity, availability, and price? This issue has obvious relevance not only to the question of viewpoint diversity, but also to the question of economic competition, since a monopoly over content outlets also means a tighter stranglehold on advertising rates.

It is not at all clear how the theoretical monopoly-as-diversity model actually works to reach under-served audiences better than the existing diversity model that is based on structural separations. The economic incentive to appeal to attractive demographics remains in either case, and in neither case are we likely to see efforts to increase the diversity of *local* content. The monopoly-as-diversity argument may have support in terms of national-scale audiences, which has lent support for cable and satellite industry concentration.[9] But this logic does not justify the speculative claim that local audiences are going to be served with a more diverse array of viewpoints under conditions of cross-ownership concentration in the production and delivery of local news and information. Advocates for removal of the ban fail to provide any empirical basis for concluding that cross-ownership concentration at the local level has resulted or will result in greater cross-media content diversity in local markets.

Synergy and Churn

In comments supporting the elimination of the cross-ownership ban, the Newspaper Association of America asserts, “Repeal of the ban would lead to significant efficiencies and operational synergies that would benefit both consumers and advertisers.”[10] In a tongue-in-cheek glossary of media mergers, the Freedom Forum’s *Media Studies Journal* puts a humorous but hardly inaccurate spin on this most-favored term of art among industry lobbyists:

> **SYNERGY –** *Current:* the transcendental, binding arc of energy that radiates throughout the land and all peoples in it when two behemoths in the media industry seek to unite in order to clobber all known competition. *Obsolete:* oligopoly.[11]

The term “synergy” functions mostly as a euphemism for profitability and growth through the elimination of competition by regulatory means. In practice, “synergies” are best illustrated by the sort of churn that recycles information across the varied platforms owned by a single media conglomerate. It is a similar logic as “churn” in financial trading: Don’t create new product. Just re-package and re-sell existing product. That is evident in Clear Channel’s “local news” networking operation, which is a “hub and spoke” system that has reporters reading news copy from a hub that is distant (even out of state) from the location where the reported news has taken place. As one study notes, reporters have very little idea of what news is important to the community on which they are reporting.[12] As this study concludes, network and conglomerate synergy is not what local news audiences are crying for. Rather, what audiences want from local news is relevance to their own “sense of place” in their communities.[13] A significant risk underlying the proposed synergies sought would be to add a touch of localism to cross-platform churn. Whether this has already been happening in existing convergence markets is an important empirical question for which the Commission currently lacks an answer, and yet the answer seems vital to its current deliberation.

TWO CULTURES: NEWSPAPERS AND BROADCASTERS

Distinct industries have distinct cultures, which is clearly in evidence when we compare the print and broadcast media. Elimination of the cable-broadcasting cross-ownership ban has been justified in part because of the historical dilution of the spectrum scarcity rationale as far as the delivery of television signals is concerned. But there is more at play in the question of whether to lift the ban on newspaper-broadcasting cross-ownership than simply the argument from scarcity. In particular, consider the question of literacy, and compare the forms of journalism practiced in the newspaper and television media. There is a considerable body of research that points to important differences in function, form, use, and effect of newspaper and television journalism.[14] Although such findings do not necessarily favor one medium in all respects over the other, there is much to indicate that these media present us with richly different frameworks for understanding public affairs, particularly insofar as we wish to promote "the widest possible dissemination of information from diverse and antagonistic sources."[15] One medium is highly visual, fast-paced, and affective in its orientation (television) and the other is more studied and cognitive (newspapers).

The reduction in scarcities of spectrum, bandwidth, or platforms is not the magic key that justifies treating broadcast and newspaper journalism as fungible. The undisputable outcome of eliminating the cross-ownership rule will be to produce a greater scarcity of independent voices. In essence, the argument from post-scarcity is an argument from quantity. But the question of newspaper-broadcast cross-ownership impact is, first and foremost, about a *qualitative* difference that has not been as relevant to the Commission's past deliberations and decisions about the relaxation of other ownership restrictions. Moreover, the post-scarcity argument emphasizes distribution systems rather than content. These are not where the emphasis should be placed. The important differences between newspapers and broadcasters are a matter of historically distinct industrial models, organizational cultures, and markets. These industries each relate differently to their audiences and readerships. Almost by definition, the journalists who work in the print and broadcast media have different styles, temperaments, intellectual strengths, and forms of appeal. Nothing is preventing newspapers from developing capacities to produce video- and audio-based news and entertainment services outside of the broadcast arena, which they are demonstrating with increasing depth, skill, and confidence. Likewise, local broadcasters are showing on their web sites that they do not need to merge with newspapers in order to develop their own independent voices in text-based modes of journalism.

THE INTERNET AND OTHER NEW AND EMERGING MEDIA

There is no evidence to indicate that the Internet and cable pose a competitive threat to independently produced local news and public affairs content. National cable channels (e.g., ESPN and CNN) and Internet services (e.g., MSN and Slate) compete for audiences for non-local content and non-local advertising dollars. At the local level, the Internet and cable mainly function as delivery systems for existing suppliers of local content. In the case of newspapers, there are good reasons to believe that the newer media have provided fruitful incentives to make the transition into multimedia local news and information sources more rapidly, which has been occurring effectively without cross-ownership in most markets.[16] Likewise, without the need for cross-ownership, the broadcast industry has moved aggressively and effectively into using the Internet as a hypermedia platform for delivering its local news and information.[17] More importantly, it has never been the mandate of the Commission to protect existing media industries from competition from emerging media. To the extent that the Internet is an increasingly important platform for the delivery of local news, it is nearly exclusively in the distribution of enhanced offerings by newspapers and local stations. This comes in the form of extended news coverage, hyperlinks to additional sources, and various other forms of innovation. This fosters healthy competition, and at the same time it reflects a willingness and ability by both broadcasters and newspapers to develop and expand their technical and creative capacities into each other's fields of expertise without cross-ownership. This is evident in the fact that newspapers have increasingly added a wide range of streaming video and audio to their online offerings, and broadcasters have begun to develop text-based reporting capacities. Both broadcasters and newspapers have made effective use of the hypertext capabilities of the World Wide Web. All of this is occurring in virtually all local markets at present, to the benefit of all U.S. citizens, without any apparent reduction in the number of independent local voices through consolidation.

At present, these separately owned and operated media are, to borrow from the Newspaper Association of America, becoming "better able to develop information delivery mechanisms that will collectively appeal to every taste."[18] It is not hard to foresee a future in which wireless Internet technology will become a major delivery system through which newspapers and broadcasters will independently develop their own distinct services and innovate in different ways to reflect the unique qualities of their journalistic cultures, with clear benefits to citizens and consumers. But a longer time frame would be needed before it is possible to assess the impact of the Internet and cable, and to monitor developments in wireless networks for delivering new audio, video, and text services to a variety of devices, including personal digital assistants (PDAs), mobile telephones, and digital car radios.

Instead of seeking an end to the significant differences in industry cultures that newspapers and broadcasters represent, there are good reasons for promoting technological innovation that capitalizes on these differences. These industries have unique technical, creative, journalistic, and entertainment formats and styles that can help to shape the emerging media markets in distinct and complementary ways. Convergence in the new media platforms is occurring and is welcome, and certainly these are new arenas for joint ventures with long-term growth and profitability potentials, but there is little empirical foundation for the assertions made by advocates of the removal of the cross-media ownership ban that these industries are suffering economic harm or a qualitative diminishment in viewpoint diversity, in this more competitive media environment. If anything, the trends are in the opposite direction.

THE PROBLEM OF EVIDENCE

The industry lobbyists who argue in favor of lifting the cross-ownership rules frequently chant the mantra that there is insufficient evidence of harm to the public interest to justify its continuation, and furthermore that the Commission bears the burden of either proving harm or eliminating the ban. Apart from the dubious view that all policy decisions are or should be based on prior evidence of harm, the empirical challenge posed, for example, by the National Association of Broadcasters, is based on a logical contradiction.[19] The Commission's original justification for the cross-ownership rules was to maximize viewpoint diversity and economic competition at the local level. The call for the Commission to produce evidence to support the claim that this justification was a valid one presupposes an alternate universe that has not existed, and so the comparison cannot be made. The only counterfactual conditions that can be compared against the structurally separated markets are those in which waivers, grandfather clauses, and the eight-year lives of broadcast licenses have permitted them. But the research to date has not supported the argument in favor of repealing the rule. Not only do the Belo and Media General studies fail to make the case, but published research cited in comments by the NAB and the Newspaper Association of America is also inconclusive.

Both trade associations cite a study by John Busterna on "station ownership effects on programming and idea diversity,"[20] claiming that "an increase in the number of television stations in a market was positively related to the minutes of local news, as well as minutes of all local programming provided by stations in that market."[21] This study examines "diversity" by creating two measures, variety of ideas considered significant by people in a media market, and diversity of views people held on several issues.[22] The most important findings are that "Crossownership showed a positive, but insignificant, relationship with the first measure of ideas diversity. Crossownership showed primarily a negative, but insignificant, relationship with the second measure of idea diversity."[23] This finding suggests that there may be no negative effect resulting from relaxing the cross-ownership rules, but it could also be used to support the view that relaxing rules would not benefit diversity. As the author states, "some indication is provided that there might be some constriction on the diversity of views expressed in cross-owned media."[24] Also, the fact that there is some evidence in this study to conclude that cross-owned stations report more local news than stations in non-converged markets might be explained by the fact that stations simply read off copy based on reports in their co-owned newspapers. It doesn't mean more newsgathering is taking place.

Arguments for elimination of the cross-ownership rules also sometimes cite research that has dubious *relevance* to the question at hand, namely, whether elimination of the rules offers a greater likelihood of viewpoint diversity and economic competition. For example, the NAB cites a 1989 study by Lacy, Atwater and Qin which, the NAB correctly notes, shows a positive correlation between increases in the number of stations competing in a market and increases in station expenditures and staff.[25] The findings do not support an argument for eliminating the newspaper-broadcast cross-ownership rules. The dependent variables were "number of employees" and "budget allocations," neither of which adds to a discussion of content diversity. One point may be valid: Stations need more employees to chase down more stories. But based on these findings, one might just as well argue that the likelihood of increasing staffs and budgets for local TV news operations would not increase (and, by the logic of the findings, might decrease) as a result of the *reduction in competition* brought on by cross-ownership with newspapers. Combined with the Busterna findings, cited above, which support the view that cross-ownership concentration might actually constrain diversity, it seems that this study does not offer any sort of compelling argument for convergence. Another cited study that is of questionable relevance demonstrates, as the NAB also correctly notes, how an increase in the number of TV stations competing in small and medium markets seems to contribute to the number of newscasts aired by these stations.[26] The study does support this claim, but it is unclear how this has any relevance to the question of cross-ownership. It seems a good thing to have increasing numbers of TV outlets prodding one another to be more responsive to market demand for local news. However, it should also be noted that the author found that "television news still operates as an oligopoly in most markets."[27] In citing these two studies – Lacy, Atwater & Qin (1989); and Powers (2001) – the NAB misleads the reader into thinking that the validity of the findings (which is not in question here) bears strongly on the empirical claim the NAB is making that viewpoint diversity and economic competition *at the local level* would be increased by the elimination of the cross-ownership rule. There is little or no connection between the findings in these studies and this claim, or at least there is not one that is argued in the NAB's comments.

A gap in reasoning cited earlier in this report, which is widespread in appeals to eliminate the cross-ownership rule, is based on the observation of a decline in channel and platform scarcity. For example, the NAB cites a study that demonstrates a positive correlation between an increase in the number of channels of television programming and the diversity of program types.[28] The findings of this study support the argument that the emergence of new platforms has diluted the market power of broadcast stations. But using these findings, which are about national, not local, channels and diversity measures, is highly misleading. As noted above (sections on "Two Cultures" and on "The Internet"), arguments built on a focus on national services and national audiences fail to address the distinctiveness of individual local markets. A local station does not lose its audience for local news because a national cable channel or national Internet service is providing national news and competing for national advertising revenues. Diversity in national news has nothing to do with the question of viewpoint diversity and local competition at the local level. The study cited here does not address the question of the impact of declining platform scarcity on diversity of *local news*. The author even explicitly acknowledges that local news was not considered in the study,[29] and yet the NAB implies that there is no need to consider this fundamental disjuncture between the data it cites and the argument it advances. For good reasons, the FCC's NPRM emphasizes the need for a focus on viewpoint diversity and economic competition *at the local level*. To the extent that advocates for removal of the cross-ownership rule use national-level data about broadcast, cable, and Internet networks to bolster an argument about the prospects for competition and diversity at the local level, they are misleading the Commission and the public.

CONCLUSION

The "urge to converge" among some (not all) newspaper and broadcast industry owners aims at producing a reduction in the number of autonomous editorial voices in a local market, leaving in its wake so-called competitors who share the economic interests of their parent companies.[30] The question of newspaper-broadcaster cross-ownership should be assessed on its own merits, in consideration of the unique features of these two particular industries and their distinct cultures and histories. There is no necessary inevitability argument to be made in support of the lifting of the ban, and yet those who advocate this action treat the ban as a dysfunctional holdout in the midst of the post-scarcity deregulatory avalanche that is so heartily welcomed by heavily concentrated firms. The removal of this ban has much higher and different stakes associated with it, with qualitatively different implications that are not reducible to questions of parent company growth and profitability. Nor is there necessarily any form of journalistic synergy that these industries can achieve together that they are incapable of achieving separately. The synergy that combining these industries offers aims at eliminating the prospects for a more diverse and independent set of new approaches to journalism to emerge. At present, the local media marketplace is far from saturated, which bodes well for the existing players to innovate and compete across existing and emerging platforms.

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[1] Federal Communications Commission (FCC), "In the Matter of Cross-Ownership of Broadcast Stations and Newspapers," and "Newspaper/Radio Cross-Ownership Waiver Policy," Notice of Proposed Rulemaking (September 20, 2001), 21.

[2] Ibid., 7.

[3] Ibid., 8.

[4] Ibid, 9.

[5] See, for example, Newspaper Association of America, Comments Submitted to the Federal Communications Commission "In the Matter of Cross-Ownership of Broadcast Stations and Newspapers and Newspaper/Radio Cross-Ownership Waiver Policy" (December 3, 2001), 18. Available at: http://www.naa.org/ppolicy/NAA_Comments.pdf.

[6] FCC, Notice of Proposed Rulemaking (September 20, 2001), 9.

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[7] Ibid.

[8] Ibid. See also Newspaper Association of America, 44 at footnote 123.

[9] Ibid.

[10] Newspaper Association of America, vi.

[11] Susan Douglas and T.R. Durham, "Mergers, Word for Word," *Media Studies Journal* (Spring 1996).

[12] Leona J. Hood, *The Local News Audience and Sense of Place: A Home in the Global Village.* Ph.D. Dissertation. University of Colorado-Boulder (2001), 262-264.

[13] Ibid., 271-275.

[14] See, for example, S. Chaffee and S. Frank, "How Americans Get Political Information: Print Versus Broadcast News," *Annals of the American Academy of Political and Social Sciences* 546 (July 1996), 48-58; E.D. Sheppard and D. Bawden, "More News, Less Knowledge: An Information Content Analysis of Television and Newspaper Coverage of the Gulf War," *International Journal of Information Management* 17 (June 1997), 211-227; and S. Chaffee and S.F. Kanihan, "Learning About Politics from the Mass Media," *Political Communication* 14(4) (Oct.-Dec. 1997), 421-430.

[15] *Associated Press v. United States,* 326 U.S. 1, 20 (1945).

[16] Robert S. Boynton, "New Media May Be Old Media's Savior," *Columbia Journalism Review* (July/August 2000). Available at: www.cjr.org; Angelique Soenarie, "Today's Question: How Has Online Competition Cut Into Your Newspaper's Readership?" *The Buzz* (April 5, 2001). Available at: http://www.asne.org/2001reporter/thursday/buzz5.html; Paul D. Colford, "Publisher Sees Times as Multimedia Player," *New York Daily News* (February 21, 2002). Available at: www.nydailynews.com. These sources suggest that newspapers are inspired and spurred, not daunted, by the prospect of increasing online competition.

[17] See, for example, the services provided by AWS, Inc., which provides TV/Internet services to more than 100 local broadcast stations. Available at: http://www.aws.com/corp/mainpage.asp.

[18] Newspaper Association of America, vi.

[19] National Association of Broadcasters, Comments Submitted to the Federal Communications Commission "In the Matter of Cross-Ownership of Broadcast Stations and Newspapers and Newspaper/Radio Cross-Ownership Waiver Policy" (December 3, 2001), 18. Available at: http://gullfoss2.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6512973998.

[20] John C. Busterna, "Television Station Ownership Effects on Programming and Idea Diversity," *Journal of Media Economics* (Fall 1988).

[21] NAB, 21. See also NAA, 23.

[22] Busterna, 72-73.

[23] Ibid., 73.

[24] Ibid., 72.

[25] NAB, 21. See Stephen Lacy, Tony Atwater, and Xinmin Qin, "Competition and the Allocation of Resources for Local Television News," *Journal of Media Economics* (Spring 1989).

[26] NAB, 22-33. See Angela Powers, "Toward Monopolistic Competition in U.S. Local Television News," *Journal of Media Economics* 14(2) (2001).

[27] Powers, 84.

[28] NAB, 22. See August E. Grant, "The Promise Fulfilled? An Empirical Analysis of Program Diversity on Television," *Journal of Media Economics* 7(1) (1994).

[29] Grant, 63.

[30] It is noteworthy that two of the leading national newspapers have published sharp critiques of the move to repeal the cross-media ownership ban. See Alex S. Jones, “The Costs of Consolidation,” *New York Times* (February 28, 2002). Available at: www.nytimes.com; William Safire, “The Urge to Converge,” *New York Times* (March 7, 2002). Available at: www.nytimes.com; and William F. Baker, “Masters of the Media,” *The Washington Post* (March 12, 2002). Available at: www.washingtonpost.com. As *Editor & Publisher* notes, “several companies will be largely inactive in any post-repeal deals.” These include Knight Ridder, the Washington Post Company, and Lee Enterprises. “Cross-Ownership Repeal’s Implications,” *Editor & Publisher* (February 21, 2002). Available at: www.editorandpublisher.com. See also Mark Fitzgerald and Lucia Moses, “Cross-Ownership By Company,” *Editor & Publisher* (February 18, 2002). Available at: www.editorandpublisher.com.