

Hello,

I am strongly opposed to any relaxation of the media ownership rules, on primarily republican grounds (in the older sense of the word, not referring to the republican party). I believe that the quality of discourse in a republic is critical to the quality of its decision-making. Hence, it is critical that we do everything we can do further the quality of discourse in the United States.

History has shown us that it is not unusual for large conglomerates in the media to use their power to direct the discourse in this country to benefit themselves. In fact, this still goes on, to the extent permitted by current media consolidation. For studies confirming this, please see the book "Do the Media Govern?" edited by S. Iyengar and R. Reeves, and also the book by S. Ansolabehere, R. Behr and S. Iyengar called "The Media Game".

The ownership rules are one way of partially fighting against this tendency. It is critical that the national discourse be distorted as little as possible, hence rules like these are very important.

It is also important to note what would be gained by a relaxation in these rules. Some slight business efficiencies, perhaps. We must balance this against the certain cost of inferior policy-making which will result from more distortion of discourse. Certainly a relaxation of rules is not worth the cost (and conversely, the maintenance of rules is well worth the cost).

A simpler way to view the utility of these rules is in terms of republican ideals. Society is best served when large concentrations of power are minimized.

I also have some specific comments on the studies released:

\* "Viewpoint Diversity in Cross-Owned Newspapers and Television Stations: A Study of News Coverage of the 2000 Presidential Campaign": this study was inconclusive and hence does not have value for making this decision. It should be noted that its inconclusivity does not argue against ownership rules, however. There exist many other studies and analyses that show that concentrations of power in the media do affect discourse.

\* The studies on substitutability, on advertising, on the proportion of advertising, on diversity of songs on the radio, on the diversity of radio ownership, and on the projected audience size of broadcast media are interesting but not very relevant to the argument that ownership rules are important because the media shapes discourse, so I won't discuss them much here.

\* The study "The Measurement of Local Television News and Public Affairs Programs" was the one that came closest to making a convincing argument for relaxation of the rules, however, its only metric for the amount of "spin" created by the various networks is how many awards they win. I am not at all convinced that networks which are more objective will win more awards. I would expect that awards would be given based on a variety of criteria, many of which would be in direct conflict to objectivity (for instance, a station

which produces dramatic, "hard-hitting" investigative reporting may win awards over another station which does less independent research but which also presents less spin).

As a side note, I do not have Microsoft Word at hand, and so it was difficult for me to read the two studies which were presented only in that format. In the future I would encourage the FCC to publish all studies in text form in addition to any proprietary formats.

Thank you for your time,  
Baylis Shanks