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Before the  
Federal Communications Commission  
Washington, D.C.

In the matter of	)	
	)	
2002 Biennial Regulatory Review – Review of the	)	MB Docket No. 02-277
Commissions’ Broadcast Ownership Rules and	)	
Other Rules Adopted Pursuant to Section 202 of	)	
the Telecommunications Act of 1996	)	
	)	
Cross-Ownership of Broadcast Stations and	)	MM Docket No. 01-235
Newspapers	)	
	)	
Rules and Policies Concerning Multiple	)	MM Docket No. 01-317
Ownership of Radio Broadcast Stations	)	
in Local Markets	)	
	)	
Definition of Radio Markets	)	MM Docket No. 00-244

To: The Commission

**EARLY SUBMISSION OF THE NATIONAL ASSOCIATION OF BROADCASTERS  
AND THE NETWORK AFFILIATED STATIONS ALLIANCE**

The Network Affiliated Stations Alliance (“NASA”), a coalition of the associations representing stations affiliated with (but not owned by) the ABC, CBS and NBC television networks, and the National Association of Broadcasters (“NAB”) submit an analysis of the Media Ownership Working Group Study titled “The Measurement of Local Television News and Public Affairs Programs” (October 1,2002). We file these comments early due to the importance of the topic, and our understanding that the FCC staff is interested in early input on this study.

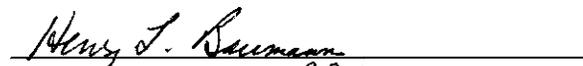
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Respectfully submitted,

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December 9, 2002

**“THE MEASUREMENT OF LOCAL TELEVISION NEWS AND  
PUBLIC AFFAIRS PROGRAMS”  
ANALYSIS OF MEDIA OWNERSHIP WORKING GROUP STUDY**

**I. SUMMARY**

The Media Ownership Working Group released a study suggesting that network-owned stations produce more and better quality news programs than independent affiliates. See Thomas C. Spavins, Loretta Denison, Scott Roberts, & Jane Frenette, “The Measurement of Local Television News and Public Affairs Programs.” (October 1, 2002). The study used flawed data and methodology, and thus its conclusions are invalid.

The most significant shortcoming of the study is its failure to hold constant the size of the market, which affects the amount and type of news programs aired by network and affiliate-owned stations. This kind of failure is a common pitfall in empirical studies. In his economics textbook, Nobel laureate Paul Samuelson cautions: “Budding economists must also be alert to common fallacies in economic reasoning. Because economic relationships are often complex, involving many different variables, it is easy to become confused about the exact reason behind events or the impact of policies on the economy.” Dr. Samuelson goes on to identify one such “common fallacy” in economic reasoning: the “failure to hold other things constant when thinking about an issue.”<sup>2</sup>

The study’s failure to hold other things constant undercuts every section. The networks own a disproportionate number of stations in the top markets. Seventy percent of network stations in the top-10 markets are O&O stations. Failing to hold constant the effect of market size on the number of hours of local news aired, and other methodological problems, accounts for the erroneous conclusion that network stations air more local news programs. And the same failing explains the erroneous conclusion that network stations air shows of higher quality, because network-owned stations in large, urban markets receive more news awards than independent stations in smaller, less densely-populated markets. Nearly 50 percent of the Dupont Silver Baton awards went to stations in the top 10 markets. Yet in the top 10 markets, affiliates out-performed network-owned stations for the receipt of the Dupont awards for local news excellence in broadcasting.

There are other methodological and data mistakes in the study that raise additional serious questions about its reliability. First, Fox stations (O&O and Affiliate) are clearly outliers with a remarkable variation in hours of news programs when compared with the other networks. Second, the data set erroneously labeled the NBC station in San Francisco as owned by NBC, when at the time of the study (November 2000) Young Broadcasting owned that station. Third, the local news data set included a WB station in San Francisco; an independent station, KTVK, in Phoenix; another independent station, WABM, in Birmingham; four stations in Orlando where

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<sup>1</sup> Samuelson, P. and Nordhaus, W.D., *Economics*, 13th ed., 2001, p 5.

<sup>2</sup> *Id.* at 6.

there is no network owned station; and four stations in Marquette (the 177th market) that cannot be compared with stations in the top markets (the second closest market included in the study is Green Bay, the 66th market). Fourth, the study of Edward R. Murrow and Dupont awards includes awards to stations in the top four markets (New York, Chicago, Los Angeles, and Philadelphia), where there are no independently-owned affiliates of the major networks. For this reason, the study excluded these markets in its examination of news and public affairs programming. Moreover, the study includes awards for “Web Site,” which is not broadcasting. The sum of all the methodological and data mistakes account for the incorrect conclusion that O&O stations do a better job of producing news programs of interest to the local community.

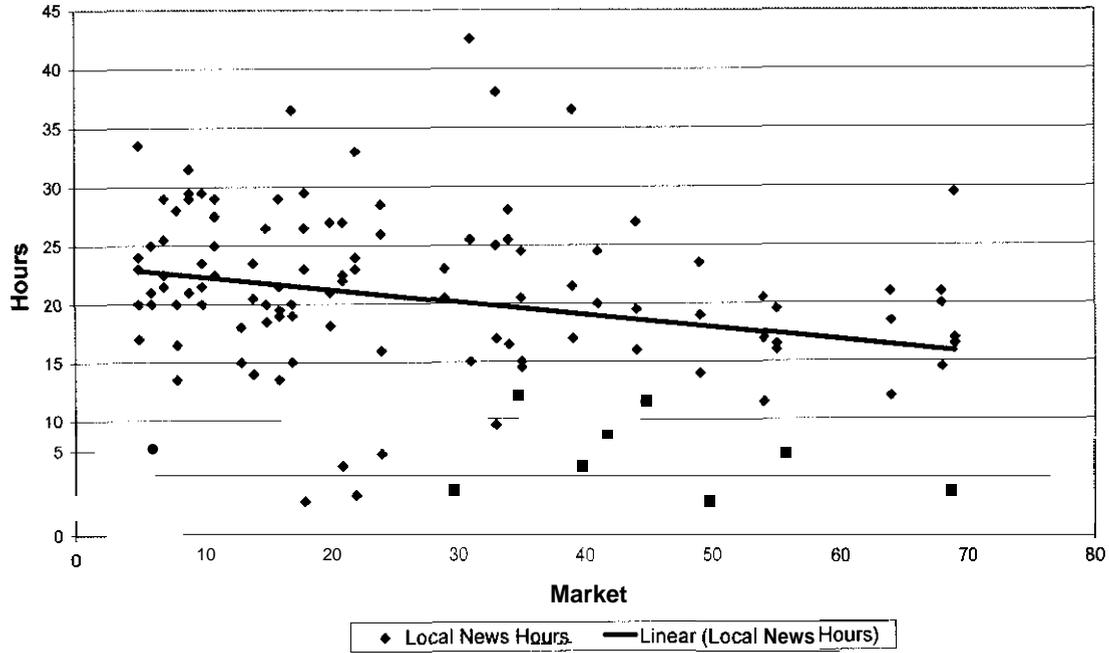
## **11. FLAWS IN THE NETWORK SERVED MARKET STUDY SECTION**

### **A. The Study Failed To Hold Constant Market Size.**

The most debilitating flaw in the study is its failure to hold constant other factors that might explain the differences in local news. The study purports to show that Network O&O’s provide, on average, **4.3** more hours of local news and public affairs programming per week than affiliates. From this observation, the study concludes that the data show that O&Os “produce, on average, a greater quantity of local news and public affairs programming than affiliates in markets where the two station types compete directly.” In fact, this conclusion is unsupported by the study’s own data.

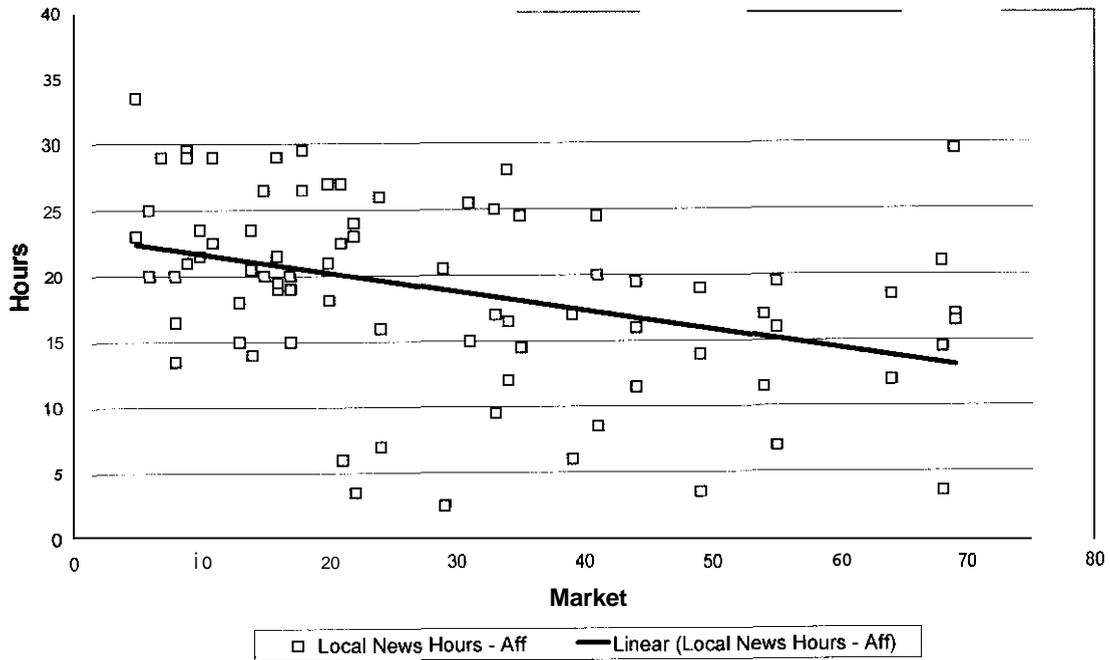
The data show that stations in larger markets air, on average, more local news than stations in smaller markets. This is evident by graphing local news against market rank. Figure 1 below graphs market rank against the total hours of local news programming. The larger the market rank, the smaller the size of the market (i.e., New York has a market rank of 1, whereas Green Bay a market rank of 66). A simple regression analysis would show that there is a statistically significant correlation between the market rank and the hours of local news.

**Figure 1**



The correlation between hours of local news and the size of the market is not driven by the presence, or absence, of network O&O's. Figure 2 shows the same correlation exists when the O&O stations are removed.

**Figure 2**



## B. Inclusion of Fox

A second serious flaw with the study arises from the inclusion of Fox stations in the sample study.<sup>3</sup>

If the data showed that O&O stations achieved higher ratings or showed more local news than affiliates, one should not on this basis alone conclude that network-owned stations outperform affiliates. An equally plausible inference from the data is that the network, in deciding what stations to own, will chose stations with strong news programs and local ratings. This is called the “selectivity-bias problem” in the economic literature.<sup>4</sup>

In contrast with ABC, CBS, and NBC, Fox has acquired many of its stations only recently. By our estimate, Fox has acquired close to 40 percent of its current stations in 2001 or 2002, and at the time of the analysis (Nov. 2000), most of the Fox-owned stations included in the study were similarly recently acquired. One would anticipate that an important consideration for Fox in acquiring those stations was the existence, or absence, of a strong local news presence. Because the Fox stations may seriously bias the results, including the Fox stations in the study is inappropriate.

Moreover, Fox affiliates are in a transition stage. Formerly independent stations are now affiliated with a national network. This transition *makes* the stations stronger, but the transformation is yet incomplete. Even a cursory examination of the data shows that Fox stations are different; its stations are all over the map in the hours of local news programming aired. In the study’s data set, the total hours of local news for Fox ranges from 2.5 hours in Raleigh-Durham to 42.5 hours in Kansas City. Seven Fox stations air fewer than 7 hours of local news, while five Fox stations air more than **30** hours.

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<sup>3</sup> We also question the validity of including the WB station in San Francisco, and the independent stations in Phoenix and Birmingham.

<sup>4</sup> See, e.g., G.S. Maddala, *Limited-Dependant and Qualitative Variables in Econometrics*, Cambridge Univ. Press, 1983, p. 257-90 (“There are many problems **in** which the data we have are generated by individuals making choices of belonging to one group or another (i.e., by individual self-selection.”).

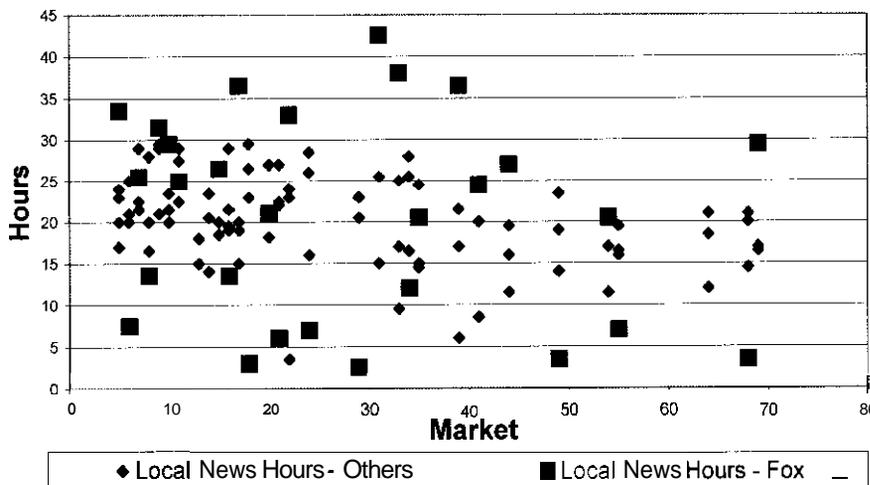
Analysis of the variation of the hours of news programming reveals that news programming hours for Fox stations deviate widely in comparison with the other networks.

**Table 1**

Descriptive Statistics Total Hours of Local News					
	All Stations	FOX	ABC	CBS	NBC
Mean	20.3	20.7	18.9	19.3	21.8
<b>Standard Deviation</b>	7.4	<b>12.4</b>	<b>5.8</b>	<b>4.7</b>	<b>5.0</b>
Minimum	2.5	2.5	3.5	6.0	11.5
Maximum	42.5	42.5	29.5	28.5	29.5
:Number of Stations	126	28	32	32	32

Comparing the Fox stations to the other network stations reveals the clear discrepancy. The differences are apparent in Figure 3 below. This chart illustrates that the number of hours of local news aired at Fox stations (in red) fluctuates widely in comparison to the tighter pattern of the other network stations (both O&O and affiliates).

**Figure 3**



Given the apparent discrepancies between Fox stations (both O&O and affiliates) and NBC, CBS, and ABC stations, the transitional nature of many of Fox's previously independent stations, and the likelihood that Fox recently selected the majority of the stations it owns based, in part, on the pre-existing strength of their news presence, we question the validity of any comparison analysis that includes the Fox stations.

### C. Revised Analysis

These methodology problems with the study are important. If one controls for other factors that influence the number of news hours, such as market size, and excluded the abnormal Fox stations, the correlation detected by the study's authors vanishes.

#### 1. Total Hours Comparision

The data reveal no statistically significant difference between the hours of local news aired by affiliates and O&O stations. Using Excel, we ran a regression analysis to reveal the impact of network ownership and market rank on the hours of local news.<sup>5</sup> Using the study's data, we included all NBC, ABC, and CBS stations in markets where at least one station was owned by ABC, CBS, or NBC, and there was at least one affiliate. (See Appendix A). The results, presented below, reveal that all stations in large markets air more local news. But having controlled for that relationship, the data show no statistically significant difference between the hours of local news aired by affiliates and O&O stations.<sup>6</sup>

**Table Two**  
(Total Hours of Local News)

	Coefficients	Standard Error	t Stat	P-value
Intercept	23.00	1.11	20.71	0.0000
Mkt rank	-0.10	0.03	-3.82	0.0003
O&O	1.12	1.13	0.99	0.3242

Dependent Variable: "Local News Hours"

#### 2. Ratings Comparision

We performed a similar regression analysis to explain the impact of network ownership and market size on news ratings. Based on experience, we expected the data to show two phenomena: first, that ratings decrease as the market gets bigger due to the fractionation of the market; and second, that O&O's will achieve lower ratings holding the market rank constant. The results of the multivariate regression analysis are presented below.

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<sup>5</sup> This multivariate regression analysis is a simple tool used by economists to hold other factors constant. See William H. Green, *Econometric Analysis*, 2d ed., 1993, p. 140-43.

<sup>6</sup> The regression analysis is sensitive to the inclusion of the abnormal Fox stations (particularly the dozen stations with hours of news below 7 or above 30). If you include these Fox stations, then the same regression analysis will show a statistically significant difference between the hours of local programming shown by O&O stations. But, as shown above, this result is driven entirely by the Fox stations. The most the study's data suggest, then, is that in November of 2000, some Fox-owned affiliates aired many more hours of local news than its independently-owned stations.

**Table Three**

Local News Ratings ( 5:30 p.m. )

	Coefficients	Standard Error	t Stat	P-value
Intercept	7.21	0.70	10.27	0.000
Mkt rank	0.01	0.02	0.39	0.696
O&O	-0.10	0.73	-0.14	0.889

Dependent Variable: "5:30 p.m. rtg"

**Table Four**

Local News Ratings ( 6:00 p.m. )

	Coefficients	Standard Error	t Stat	P-value
Intercept	6.965	0.90	7.77	0.000
Mkt rank	0.026	0.02	1.24	0.221
O&O	-0.004	0.91	0.00	0.997

Dependent Variable: "6:00 p.m. rtg"

The results are ambiguous (not “statistically significant”), but the estimated coefficients suggest that ratings decrease for larger markets, and that O&O’s achieve lower ratings on average than affiliates.

### III. FLAW WITH THE NEWS AND PUBLIC AFFAIRS AWARDS SECTION

The failure to “hold other factors constant” also undermines the study’s analysis of the news and public affairs awards. The study looked at the number of Dupont and Edward R. Murrow awards from 1991 through 2002. Reporting the results as an index, the authors concluded that, for example, network-owned stations were 3.37 times as likely to win a Dupont award, as are independently-owned stations. Because the assumptions underlying the methodology are deeply flawed, the author’s conclusions are unreliable.

The key underlying assumption is that all stations in the various markets stand an equal chance of receiving a Murrow or Dupont award, but for the ownership of the station. If this assumption is invalid, the index calculated by the authors has no value. The reported index captures the success relative to the per-station average of awards in the sample base. It presumes that every station in the sample base stands an equal chance of winning an award.’ Seeing a large number of awards going to O&O stations, when compared to the percentage of O&O

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<sup>7</sup> The sample base of the RTDNA award index is the top 50 markets. So implicit in that index is the assumption that stations in Albuquerque-Sante Fe (the 50th market, with 570,000 households) compete on an even playing field with stations in New York, Los Angeles, and Chicago (with over three million households). The sample base for the Dupont award index is even larger: it encompasses all television markets. So that index presumes that stations in Cedar Rapid (with 300,000 households) and even stations in markets like Juneau or North Platte (with fewer than 25,000 households) compete equally for the Dupont awards with the top markets.

stations in the sample base, the authors conclude that “With respect to the receipt of awards for local news operations, network O&O’s outperform affiliates.”

However, stations in larger markets will win a greater proportion of Murrow and Dupont awards. In **2002** and **1992** respectively, WABC-TV in New York and KMML-TV in Cedar Rapids won the prestigious Dupont award, the self-acclaimed equivalent to the Pulitzer in broadcasting. The O&O station serves a market **twenty** times as large as Cedar Rapids, Iowa. One can only imagine the hugely different news-related resources and news opportunities of these two stations. It is not surprising that WABC-TV has won twice as many Dupont awards as JSMML-TV; it is amazing that **David** beat **Goliath** at all.

Cursory examination of the Dupont awards reveals the magnitude of the mistake in the authors’ methodology. Our analysis focuses on the Dupont awards listed by the authors in Appendix C of their study, since it is here that the authors’ detected the largest difference between O&Os and affiliates. The table on the following page shows that stations in the larger markets dominate the Dupont awards. One may applaud the remarkable achievements of small, affiliate stations such as JSMTW-TV in Auburn, Maine, KREM-TV in Spokane, Washington, and KOLD-TV in Tucson, Arizona. But they are the exception. Since 1991, **46 percent of the Dupont-Columbia Silver Baton Awards have gone to stations in the top 10 markets.**

## Dupont-Columbia Silver Baton Awards

Station	O&O	City	Market Rank	Television Households*	Title	Year	Cumulative Percentage
WABC-TV	X	New York	1	6,935,610	Caught Off Guard	2002	2.0%
WNET/PBS		New York	1	6,935,610	Taken In: The Lives of America's Foster	1999	4.0%
WABC-TV	X	New York	1	6,935,610	Room 194: The Overcrowding Crisis	1998	6.0%
WBAI/Pacifica		New York	1	6,935,610	Massacre: The Story of East Timor	1994	8.0%
KCBS-N	X	Los Angeles	2	5,354,150	Poison Plant	2002	10.0%
KCET-TV/PBS		Los Angeles	2	5,354,150	The Great War & The Shaping of the 20th Century	1998	12.0%
KTTV	X	Los Angeles	2	5,354,150	Cops on Trial: The Rodney King Case	1993	14.0%
WMAQ-N	X	Chicago	3	3,244,850	Strip Search at O'Hare	1999	16.0%
WBBM-TV	X	Chicago	3	3,244,850	Congressman William Lipinski's Primary Campaign	1999	18.0%
KRON-TV		San Francisco	5	2,431,720	In the Shadow of the Wall	1994	20.0%
KPIX-TV	X	San Francisco	5	2,431,720	Wards of the State	1992	22.0%
KQED-TV/PBS		San Francisco	5	2,431,720	Shield for Abuse	1991	24.0%
KCBS-AM		San Francisco	5	2,431,720	Earthquake	1991	26.0%
WCVB		Boston	6	2,242,240	Chronicle and Environmental Reporting	1993	28.0%
WFAA-TV		Dallas	7	2,069,010	News Report of Insurance Scandal	1997	30.0%
KERA-TV/PBS		Dallas	7	2,069,010	LBJ	1993	32.0%
WFAA-N		Dallas	7	2,069,010	Coverage of the Gulf War	1992	34.0%
WMAL-AM		Washington, DC	8	2,047,340	American History- The Disney Version	1996	36.0%
WJLA-TV		Washington, DC	8	2,047,340	NFL Drug Testing: Illegal Procedure	1991	38.0%
WXYZ-TV		Detroit	9	1,873,620	Target 7: Michigan's Secret Soldiers	1996	40.0%
WTVS-TV/PBS		Detroit	9	1,873,620	The Last Hit Children and Violence	1995	42.0%
WTVS-TV/PBS		Detroit	9	1,873,620	Who Killed Vincent Chin?	1991	44.0%
WTBS-TV/TBS	X	Atlanta	10	1,857,220	The Urban Gorilla	1992	46.0%
KHOU-N		Houston, TX	11	1,747,350	Deadly Tires?	2001	48.0%
KIRO-TV		Seattle	12	1,605,900	Why the Orcas of Puget Sound Are Dying	2000	50.0%
KING		Seattle	12	1,605,900	America's Health Care Crisis	1991	52.0%
KTCA/PBS		St. Paul	13	1,510,130	Unisys	1998	54.0%
WCCO-TV	X	Minneapolis	13	1,510,130	Missing the Beat	1995	56.0%
KSTP		Minnesota	13	1,510,130	Who's Watching the Store	1993	58.0%
WEWS		Cleveland	15	1,488,270	Final Mission	1999	60.0%
WKYC-TV		Cleveland	15	1,488,270	Nightly Commentaries	1991	62.0%
WTVJ-TV	X	Miami	16	1,468,630	Haiti	1996	64.0%
WTVJ-TV	X	Miami	16	1,468,630	Coverage of Hurricane Andrew	1994	66.0%
WPLG-N		Miami	16	1,468,630	Armed Enemies of Castro	1994	68.0%
KCNC-N	X	Denver	18	1,312,300	Erin's Life	1993	70.0%
KBDI-TV/PBS		Denver		1,312,300	Tierra O Muerte: Land or Death	1992	72.0%
WBFF-TV		Baltimore	24	1,010,160	Justice on Trial: The Lost Generation	1994	74.0%
WBFF-TV		Baltimore	24	1,010,160	Finding the Lost Generation	1994	76.0%
WBFF-TV		Baltimore	24	1,010,160	The Walking Wounded	1994	78.0%
WTHR-TV		Indianapolis	26	974,390	Guarding the Guardians	2000	80.0%
WRAL-TV		Raleigh, NC	29	873,440	Series of Investigative Reports on Military	1999	82.0%
WCPO-TV		Cincinnati	32	828,650	I-Team Stadium Investigation	2001	84.0%
WCPO-N		Cincinnati	32	828,650	Made in the USA?	1993	86.0%
KNX - N		Salt Lake City	36	732,380	Investigative Reporting of Olympics Bribery	1997	88.0%
WCBD-N		Charleston, SC	61	481,200	Coverage of Hurricane Hugo	1991	90.0%
KOLD-N		Tucson	71	391,930	Exploding Patrol Cars?	2002	92.0%
KXLY-TV		Spokane, WA	77	370,060	Public Funds, Private Profit	2001	94.0%
KREM-TV		Spokane	77	370,060	Wenatchee Child Sex Ring	1997	96.0%
WMTW-TV		Auburn, ME	79	362,660	Christian Civic League	2000	98.0%
KWWL-TV		Cedar Rapids, IA	89	307,310	Cloud of Concern	1992	100.0%

Source Data: FCC Study Appendix C ([www.jrn.columbia.edu](http://www.jrn.columbia.edu))

\* Broadcast & Cable Yearbook 2001 (B-246-249)

Ironically, network-owned stations *under-performed* other independently-owned stations in the top 10 markets. Network-owned stations account for 55 percent of the network and PBS stations in the top 10 markets, and 70 percent if you exclude PBS. (See Appendix B). Focusing on network stations, the O&O stations under-performed affiliates, as shown below.

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	Percentage of Network Stations	Percentage of Awards to Network Stations
O&O	70 %	54 %
Affiliates	30 %	46 %

In short, network-owned stations in the top 10 markets (where a near-majority of the Dupont awards were given) were significantly *less* likely to win Dupont awards than other broadcasting stations in those same markets.

#### IV. CONCLUSION

This analysis explains the methodological mistakes with the study. NASA disagrees with the authors' suggestion that network-owned stations air more and higher quality local news programming. Networks own a disproportionate number of stations in the top markets. Therefore, the failure to hold constant the size of the market renders all comparisons in this study unreliable.

Moreover, the FCC should place no reliance on conclusions drawn by any study that assumed that stations in regional markets like Cedar Rapids, Iowa, compete on an equal basis for news awards with stations in New York, Los Angeles, and Chicago. With smaller budgets, these stations produce news targeted for viewers in their locality, not for the judges of these kinds of awards. The fact that these affiliate stations win fewer Dupont or Murrow awards provides no plausible basis to conclude that the viewers in these localities would be better served by broadcasting stations owned by networks.

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<sup>8</sup> This table includes only ABC, CBS, NBC, and Fox affiliate and O&O stations. The authors of the FCC study had intended to exclude awards to all radio and PBS stations. Unfortunately, the authors inadvertently included Dupont awards to three radio stations, KCBS-AM, WBAI/Pacifica, and WMAL-AM, a TBS station, and numerous public broadcasting stations, such as KCET-TV, and KQED-TV. In fact, the erroneously included awards appear to account for 24 percent of the data points used by the study to calculate the index. If, however, one reproduced the authors' analysis, but focused only on the top markets, the O&O stations would still under-perform the independently-owned affiliate stations.

## Appendix A

Mkt rank	Market	Calls	Affil	O&O	Ownership	5:30 pm rtg	5:30 pm sh	6 pm rtg	6 pm sh	Local News Hours	Public Affairs Hours
5	SF	KGO	ABC	1	ABC Inc.	7	15	8	16	20	0.5
5	SF	KRON	NBC	1	NBC/GE	7	15	6	12	24	2.5
5	SF	KPIX	CBS	1	CBS	4	8	5	10	17	
6	Boston	WCVB	ABC	0	Hearst-Argyle	9	18	8	15	20	1
6	Boston	WHDH	NBC	0	Sunbeam TV	8	15	8	15	25	
6	Boston	WBZ	CBS	1	CBS	4	9	6	11	21	
7	Dallas	WFAA	ABC	0	Belo Corp	10	18	11	19	29	0.5
7	Dallas	KXAS	NBC	1	NBC/GE	9	16	9	15	22.5	0.5
7	Dallas	KTVT	CBS	1	CBS	3	6	3	5	21.5	
8	DC	WRC	NBC	1	NBC/GE	7	15	9	18	28	0.5
8	DC	WJLA	ABC	0	Allbritton	5	10	5	11	16.5	0.5
8	DC	WUSA	CBS	0	Gannett	4	8	5	10	20	0.5
10	Detroit	WDIV	NBC	0	Post-Newsweek	10	19	11	20	21.5	
10	Detroit	WXYZ	ABC	0	Scripps Howard	9	18	9	17	23.5	
10	Detroit	WWJ	CBS	1	CBS	2	4	2	4	20	
11	Houston	KTRK	ABC	1	ABC Inc.	9	15	9	15	27.5	
11	Houston	KHOU	CBS	0	Belo Corp	9	16	11	17	22.5	
11	Houston	KPRC	NBC	0	Post-Newsweek	7	13	7	12	29	0.5
13	Minneapolis	WCCO	CBS	1	CBS	11	22	12	22	18	
13	Minneapolis	KARE	NBC	0	Gannett	9	17	9	15	15	
13	Minneapolis	KSTP	ABC	0	Hubbard	6	12	7	12	18	1
15	Miami-F.L.	WPLG	ABC	0	Post-Newsweek	5	10	6	11	20	
15	Miami-F.L.	WTVJ	NBC	1	NBC/GE	4	8	6	10	26.5	
15	Miami-F.L.	WFOR	CBS	1	CBS	4	7	4	7	18.5	1
18	Denver	KMGH	ABC	0	McGraw Hill	6	11	5	9	26.5	1
18	Denver	KCNC	CBS	1	CBS	7	14	8	15	23	
18	Denver	KUSA	NBC	0	Gannett	9	17	8	14	29.5	0.5
21	Pittsburgh	WTAE	ABC	0	Hearst-Argyle	9	17	9	16	27	
21	Pittsburgh	KDKA	CBS	1	CBS	10	18	1	20	22	0.5
21	Pittsburgh	WPXI	NBC	0	Cox	10	18	10	17	22.5	0.5
24	Baltimore	WMAR	ABC	0	Scripps Howard	3	6	3	5	16	
24	Baltimore	WJZ	CBS	1	CBS	7	15	8	15	28.5	
24	Baltimore	WBAL	NBC	0	Hearst-Argyle	9	18	9	17	26	1.5
29	Raleigh-Durham	WTVD	ABC	1	ABC Inc.	9	16	10	17	20.5	
29	Raleigh-Durham	WRAL	CBS	0	Capitol Broadcasting	12	23	14	24	20.5	

Appendix A

Mkt rank	Market	Calls	Affil	O&O	Ownership	5:30 pm rtg	5:30 pm sh	6 pm rtg	6 pm sh	Local News Hours	Public Affairs Hours
29	Raleigh-Durham	WNCN	NBC	1	NBC/GE			2	4	23	
34	Columbus, OH	WSYX	ABC	0	Sinclair			5	9	16.5	
34	Columbus, OH	WBNS	CBS	0	Dispatch Printing Co.	10	20	11	21	28	
34	Columbus, OH	WCMH	NBC	1	NBC/GE	9	17	10	19	25.5	
35	Salt Lake City	KTVX	ABC	0	News Corp.	8	16	7	13	14.5	0.5
35	Salt Lake City	KUTV	CBS	1	CBS	6	11	6	11	15	0.5
35	Salt Lake City	KSL	NBC	0	Bonneville Intl Corp.	9	19	10	19	24.5	
39	Birmingham	WBMA	ABC	0		10	15	9	13	17	
39	Birmingham	WIAT	CBS	0	Media General	5	7			6	
39	Birmingham	WVTM	NBC	1	NBC/GE	9	14	8	12	21.5	
49	Providence	WLNE	ABC	0	Freedom Comm			4	7	14	
49	Providence	WPRI	CBS	0	STC Broadcasting	3	7	5	9	19	
49	Providence	WJAR	NBC	1	NBC/GE	12	23	15	27	23.5	
54	Austin	KVUE	ABC	0	Belo Corp	10	25	9	20	17	0.5
54	Austin	KEYE	CBS	1	CBS	5	12	4	10	17	
54	Austin	KXAN	NBC	0	LIN Television Corp.	7	17	8	17	11.5	
55	Fresno	KFSN	ABC	1	ABC Inc.	12	25	13	24	16.5	
55	Fresno	KGPE	CBS	0	Ackerley Group	3	6	3	5	16	
55	Fresno	KSEE	NBC	0	Granite Broadcasting	7	15	8	17	19.5	
64	Flint	WJRT	ABC	1	ABC Inc.	9	24	14	29	21	1
64	Flint	WNEM	CBS	0	Meredith	5	15	12	24	18.5	0.5
64	Flint	WEYI	NBC	0	STC Broadcasting			2	4	12	1.5
68	Toledo	WTVG	ABC	1	ABC Inc.	6	15	10	21	20	
68	Toledo	WTOL	CBS	0	Liberty Corp.	10	28	16	34	21	1
68	Toledo	WNWO	NBC	0	Raycom Media	3	7	3	7	14.5	
69	Green Bay	WBAY	ABC	0	Young Broadcasting Inc.	10	23	12	26	17	
69	Green Bay	WFRV	CBS	1	CBS	10	22	11	22	16.5	
69	Green Bay	WGBA	NBC	0	Aries Telecomm	3	7	2	5	16.5	

Source: NSI Nov 2000

Source: BIA Associates, BIA  
Master Access Data base  
(March 2002)

**Appendix B**

**Network-Owned Stations in Top 10 Markets**

Station Name	Network	Ownership	Market
WABC	ABC	ABC	New York
WCBS-TV	CBS	CBS	New York
WNBC	NBC	NBC	New York
WNWY	Fox	Fox Television Stations	New York
WNYE-TV	PBS	Board of Education of NYC	New York
KABC-TV	ABC	ABC	Los Angeles
KCBS-N	CBS	CBS	Los Angeles
KNBC	NBC	NBC	Los Angeles
KTTV	Fox	Fox Television Stations	Los Angeles
KLCS	PBS	LA Unified School Dist.	Los Angeles
WBBM-TV	CBS	CBS	Chicago
WMAQ-N	NBC	NBC	Chicago
WFLD	Fox	Fox Television Stations	Chicago
WYCC	PBS	College Dist. #508, Cook Co.	Chicago
WPVI-TV	ABC	ABC	Philadelphia
KYW-TV	CBS	CBS	Philadelphia
WCAU	NBC	NBC	Philadelphia
WTFX-TV	Fox	Fox Television Stations	Philadelphia
WYBE	PBS	Independence Public Media	Philadelphia
KGO-TV	ABC	ABC	San Francisco-Oakland-SanJose
KPIX-TV	CBS	CBS	San Francisco-Oakland-SanJose
KRON-TV	NBC	Young Broadcasting	San Francisco-Oakland-SanJose
KTVU	Fox	COX Enterprises	San Francisco-Oakland-SanJose
KQED	PBS	KQED Inc.	San Francisco-Oakland-SanJose
WCVB-N	ABC	Hearst-Argyle	Boston
WBZ-N	CBS	CBS	Boston
WHDH-TV	NBC	Sunbeam Television	Boston
WFXT	Fox	Fox Television Stations	Boston
WGBX-N	PBS	WGBH Educational Foundation	Boston
WFAA-N	ABC	Belo Corp.	Dallas-Fort Worth
KTVT	CBS	CBS	Dallas-Fort Worth
KXAS-TV	NBC	NBC	Dallas-Fort Worth
KDFW	Fox	Fox Television Stations	Dallas-Fort Worth
KERA-TV	PBS	North Texas Public Broadcasting	Dallas-Fort Worth
WJLA-TV	ABC	Allbritton Communications	Washington, DC
WUSA	CBS	Gannett Broadcasting	Washington, DC
WRC-N	NBC	NBC	Washington, DC
WTTG	Fox	Fox Television Stations	Washington, DC
WXYZ-TV	ABC	Scripps Howard	Detroit
WWL-TV	CBS	CBS	Detroit
WDIV	NBC	Post-Newsweek Stations	Detroit
WJBK	Fox	Fox Television Stations	Detroit
WTVS	PBS	Detroit Educational Television	Detroit
WSB-TV	ABC	Cox Broadcasting	Atlanta
WGCL-TV	CBS	Meredith Broadcasting	Atlanta
WXIA-N	NBC	Gannett Broadcasting	Atlanta
WAGA	Fox	Fox Television Stations	Atlanta
WPBA	PBS	Board of Education of Atlanta	Atlanta