

Thanks for this opportunity to comment on how well FCC policies decided in Washington actually work in the rest of the country. It is a vitally important thing to do.

First, I want to let you know of a small but illustrative concern about local access to broadcast media for me personally. I am a long-time resident of Big Sur. At my house, the available broadcast media consist of one AM station in Spanish, one AM station in English, and one FM public radio station. The FM station originates in Santa Cruz, and is the closest to my house. We get no other radio and no broadcast television reception at all. In the absence of regulation, the expense of providing and maintaining the physical equipment needed to provide coverage for our sparsely settled and geographically challenging region will never be something a good business could justify, yet we, too, need the public benefits provided by broadcast media - news, information and above all emergency management. The market can't ever help us - we are too small, and too expensive per person. I am hoping that the FCC can.

Some would suggest that this is my own choice for living in a remote area, as if only urban dwellers can care about their society. Besides, they might say, I can get information other ways in today's environment. However, cable is not available here - it stops 7 miles away. I do have access to information thru the internet and thru satellite TV, which very recently added an option to purchase local stations access, and I am thus seeing the local TV news for the first time ever. This costs money. I am fortunate - I can afford it, and I choose to do so. Others do not have that luxury. So, as we talk about what the FCC can do to improve localism, please remember that some of the concern about availability is about physical access.

I have just addressed the fourth question the panel proposed, with respect to remote residents in rural areas and the lack of free broadcast media options for us. In response to the first, second and fifth questions, what I see the broadcast media doing now for the community is only one part of what I need for them to do.

Right now, our local media regularly and effectively spread the word on a variety of issues that affect our lives and that we've pretty much already all agreed about as a civil society: for example, literacy is important, pre-natal care is a good idea, and that involved parents can help kids avoid drugs and smoking and generally succeed in life. They support charities and non-controversial non-profit endeavors with reduced rates for airtime and with expertise. They contribute to charities, and encourage their employees to contribute time and money as well. (Of course so do most other local businesses and many private persons from all walks of life - thank goodness!) This is great, important and praiseworthy. Indeed, local charities and NPOs that are able to get help in advancing their goals depend upon it. and are appropriately grateful - so grateful in fact that they are collectively hesitant to criticize the media in any way or to ask for anything more for fear of losing the benefits they have now.

What the media are not doing is helping us understand the substance of issues where there are public differences of opinion or policy debates. 30 seconds maximum coverage about a deliberative hearing on the evening news does not provide adequate information about the workings of government on any topic I can think of. Regardless of how well informed and involved broadcasters may be individually, they simply cannot convey a useful amount of information in such small segments. The segments are very infrequent, too short, and usually show a bit of the process focused on personalities rather than any reporting of substance. Many nights the news is nothing but crime and accidents - interesting to be sure, but hardly the only kind of public benefit that we can expect from our airwaves. Longer segments and regular coverage are needed. This is true of partisan political matters as well - even if we do have something that speaks on an issue rather than on the horse race, time allowed is simply too short to do the issue justice.

As citizens in a democracy, we need in depth information in order to participate effectively, to understand the complex choices we face in our communities as well as our country.

I've got an idea: let's raise the bar, and ask for what we really need. Airwaves belong to the public. Public resources ought to be managed to support public needs. The broadcast media business appears to be flourishing, and I think the public's investment deserves to do at least as well as the private one. In case you are wondering, here's about the very least that I think would be fair.

I want the FCC, acting as the public's agent, to require that a minimum of 10% of our broadcast time be used for our benefit, and I want to take it in value-adjusted airtime - that is, with the amount of time adjusted to take into consideration how desirable that time is. That would be equivalent to somewhere around 18 minutes out of the 3 hours considered prime time daily - every day. (Civil society happens all the time - not only before elections.) That is the minimum amount of time I think needs to be devoted to civil discourse and the coverage of public debate and decision making, in return for the privilege of using our airwaves to make money. Of course broadcasters would be free to do more.

If as broadcasters say this kind of programming is not profitable, then requiring it from everyone should level the playing field and protect those of our local broadcasters who are responsible and who are trying to do a good job for their communities as well as for their stockholders from the unfair advantage taken by those broadcasters who lack this sense of responsibility.

Then of course the FCC will need to work with broadcasters and other stakeholders to figure out a way to hand out that time fairly and in a way that ensures that the information is not only accurate but also sufficiently detailed to be useful. Allowable programming should certainly include education efforts as it does now. It should also include coverage of issues that have more than one side and that require more than 15-seconds to explain in detail. We should also require that this time must include coverage of all the issues and candidates in political races at all levels that affect

a local area - not just 'the horse race', as the fashionable phrase goes, either, but the substantive issues. That's why we need our 10% - 18 minutes of prime time every day.

I know that 10% is way more than we will ever get. I am using this idea not only specifically though, but also to give an idea of the magnitude of the need as opposed to the miniscule results we've received by waiting for the market to take care of our needs. Basically, the market model is misapplied here. Markets work where there is brisk competition and an equality of power. The five mega-corporations that own most of the media now have the ability to control the information that we receive. It is clearly in their business interests to do so. We cannot simply hope that they will not choose not to.

They have a built-in incentive to discourage controversy in order to avoid offending sponsors. The larger the conglomeration of companies under one corporate roof, the more possibilities there are to offend someone important. Thus the available pool of unexceptional topics shrinks with every acquisition of an independent local source by a larger corporate entity.

At the same time, local live reporting is replaced by material which is generated somewhere else in the corporate structure. Even the features show this. When cute kid and dog pictures are featured, they are often from other parts of the country - as if there were no local kids or dogs. The ability to provide national coverage by using the resources of an affiliate or a corporate owner is not, in my view, sufficient compensation for the way in which this kind of mass production separates us from our communities and from each other.

As many inside and outside of the industry have testified, the simple answer to promoting more localism in broadcasting is for FCC regulations to promote more local control of media outlets, and to discourage remote control by corporate interests that lack functional connections to local areas. The free market will not do this naturally, because it doesn't have a way to place value on the civic health of the community, which includes healthy controversy.

We desperately need a return of the fairness doctrine. We need to ensure true capitalism in the media by removing the ability of media companies to own in other product areas and drastically reduce the number of outlets they can own. We need to even up their power with ours. That, I believe, is why we need the FCC in the first place.