Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of: Broadcast Localism	MB Docket No. 04-233

SUPPLEMENTAL COMMENTS OF BELO CORP.
IN RESPONSE TO THE LEAR CENTER STUDY

Belo Corp. ("Belo") hereby submits these comments to supplement its comments of November 1, 2004 and January 3, 2005 and to respond to the Lear Center Local News Archive's "Local News Coverage of the 2004 Campaign: An Analysis of Nightly Broadcasts in 11 Markets" (the "Lear Center Study" or "Study").[1]

The Lear Center Study, which has been cited as a basis for criticism of both the quantity and quality of local political campaign coverage by the broadcast media,[2] examined the pre-election coverage of network-affiliated television stations in eleven major markets during the evening hours (5:00 p.m. through 11:30 p.m.) for the 29-day period from October 4 to November 1, 2004. Belo submits, however, that the Study does not provide a full or fair picture of the pre-election coverage offered by the stations involved. Specifically, the Study fails to take into account broadcasters' full slate of political newscasts and other election-related programming and, at least in the case of the two Belo stations included, significantly understates the amount of

[1] *See Broadcast Localism*, The Lear Center Local News Archive, "Local News Coverage of the 2004 Campaigns: An Analysis of Nightly Broadcasts in 11 Markets," MB Docket No. 04-233 (Feb. 7, 2005).

[2] *See, e.g.*, Statement of Comm'r Jonathan Adelstein, Feb. 15, 2005; Senator McCain Introduces Broadcasting Reform Legislation, Feb. 15, 2005, at http://mccain.senate.gov/index.cfm?fuseaction=Newscenter.ViewPressRelease&Content_id=1523.

candidate-centered programming revealed by Belo's internal analysis of its stations' political coverage. Interestingly, the Lear Center has repeatedly praised the Belo affiliates that were included in this study, WFAA-TV in Dallas, Texas and KING-TV in Seattle, Washington, awarding them its prestigious Walter Cronkite Awards for Excellence in Television Political Journalism. Given the obvious methodological shortcomings and other limitations of the Study, and considering the extensive information already submitted for the record in this proceeding by Belo and other parties concerning broadcasters' attention to local concerns,[3] Belo submits that the Study should not be accorded any decisional significance. Certainly, the Lear Center Study does not provide a basis for the imposition on broadcasters of mandatory quantitative content requirements relating to political coverage or any other subject.

Although its sponsors state that it used "sophisticated market-based media server technology" to record, analyze, and code news programming, the Lear Center Study captures only a limited segment of election-related programming and apparently does not consider morning and daytime programming, which constitute a significant portion of local stations' newscasts. Indeed, most local stations, including Belo's network affiliates, air hours of news in early morning and lunchtime telecasts. In addition, much Sunday daytime programming is politically focused, regardless of whether an election is near. Belo's KING-TV, for example, supplements the national Sunday morning political shows with its own Sunday afternoon political program that aired debates among candidates for Congress and Washington state Attorney General, as well as other issue-oriented programming.[4] The Lear Center Study,

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[3] Belo, for example, submitted the results of its internal study of non-entertainment programming, which confirmed that Belo's major network-affiliated stations broadcast an average of 65 hours of non-entertainment programming per week, most of which consisted of newscasts and other news and informational programming. *See Broadcast Localism*, Comments of Belo Corp. to *Notice of Inquiry*, MB Docket No. 04-233 (Nov. 1, 2004), at 4-5.

[4] *See* Letter from KING-TV to Kaplan, Goldstein, and Hale of 2/17/05, at 1 (Ex. 1).

however, does not account for any of these broadcasts, instead limiting its research to nightly news broadcasts aired between 5:00 p.m. and 11:30 p.m.[5]

Even for the periods it does analyze, the Study's figures are inconsistent with the amount of political programming revealed by Belo's internal analysis of its stations' political coverage. For example, on October 13, 2004, KING-TV aired a prime time debate between two candidates for governor that does not appear in the Study. A number of other political programs also are not included.[6] More significantly, the Study apparently overlooks Belo's "It's Your Time" initiative, which produced a series of unedited statements totaling five minutes each for local candidates.[7] The Study acknowledges only 23 minutes of "free air time" outside of regular newscasts. Between WFAA-TV and KING-TV, the two Belo affiliates that the Lear Center scrutinized, however, thirty-six candidates participated in "It's Your Time" between September 21 and Election Day in 2005. These two stations *alone* gave away 180 minutes of free air time for local political candidates to speak to their constituencies, but the Lear Center Study does not reflect these efforts. Regardless of whether the Center's methodology and limited time frame or inadvertent oversight led to this result, the Study clearly understates how much political coverage

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[5] The Lear Center Study apparently limited the broadcasts it studied in accordance with statements of The Advisory Commission on Public Interest Obligations of Broadcasters in the Digital Age ("The Gore Commission"), which recommended that time frame for measuring the industry's voluntary public interest obligations. The Gore Commission, however, did not consider the issue of regular news coverage of political campaigns. Rather, it wanted stations to expand the amount of "candidate-centered political discourse" by implementing 5-minute daily segments. With this goal in mind, the Commission had no reason to include daytime Sunday broadcasting, which already included such programming, or other programming outside the selected time periods.

[6] *See* Letter from KING-TV to Kaplan, Goldstein, and Hale of 2/17/05, at 2 (Ex. 1) (noting the exclusion of, *inter alia*, (1) a three-minute piece with excerpts from the Attorney General debate on October 9, 2004; (2) a story on October 20, 2004 about the re-election of a Washington Supreme Court justice facing opposition from families of murder victims; (3) any of the several stories on state Initiative 892, which proposed expansion of slot machines; and (4) one-third of KING-TV's locally produced Ad-Watches).

[7] For a fuller discussion of "It's Your Time," *see Broadcast Localism*, Comments of Belo Corp. to *Notice of Inquiry*, MB Docket No. 04-233 (Nov. 1, 2004), at 9; *Broadcast Localism*, Further Comments of Belo Corp. to *Notice of Inquiry*, MB Docket No. 04-233 (Jan. 3, 2004), at 2.

Belo's stations aired. It may be assumed that similar shortfalls would be found in the Lear Center's analysis of other stations' efforts.

Recently, the Lear Center announced that for the second consecutive year, both WFAA-TV and KING-TV deserved Walter Cronkite Awards for Excellence in Political Television Journalism. In announcing the Awards, the USC Annenberg School of Communication, which sponsors both the Lear Center and the award, stated:

> WFAA won a second consecutive Cronkite Award for its 'continuing commitment to expose political issues and candidates to viewers.' WFAA covered both the local and national aspects of the 2004 races, and it created a unique partnership with another station in the market to provide free air time for candidates.[8]

Similarly, the School praised Robert Mak and Mike Cate, a reporter and producer, respectively, at KING-TV for their "thorough and balanced coverage, good writing, and excellent reporting and producing."[9] These observations quite clearly belie the findings of the Lear Center Study. Stations such as WFAA-TV and KING-TV win awards not because they are motivated by government micromanagement, but instead because of their journalistic integrity and the drive to distinguish themselves from the competition. This drive translates directly into high ratings and profitable operations, proving that the marketplace provides the best framework for furthering the goals of localism.[10]

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[8] USC Annenberg Announces Winners of the Walter Cronkite Award for Excellence in Television Political Journalism, March 9, 2005 at http://ascweb.usc.edu/asc.php?pageID=388&storyID=65 (Ex. 2).

[9] *Id*. KING-TV has actually won a Cronkite Award for three straight years, and this year won an Edward R. Murrow Award in its region for "overall excellence."

[10] In fact, according to an October 2004 Wirthlin Worldwide poll, nearly 9 out of 10 registered voters thought local broadcasters spent "about the right amount" of time or "too much time" covering elections. *See Broadcast Localism*, Comments of Nat'l Ass'n of Broadcasters to *Notice of Inquiry*, MB Docket No. 04-233 (Nov. 1, 2004), at 50.

Given the limited focus of the Lear Center Study, its understated results, and its sponsors' recent praise of some of the very stations that were the subject of the Study, the Lear Center's findings hardly justify the agitated reactions they initially evoked. Further, the Commission plainly should not rely upon the Study as a basis for burdening broadcasters with unnecessary additional regulations such as quantitative content requirements. Such regulations would only serve to increase the cost of complying with one-size-fits-all governmental oversight and minimize stations' flexibility to attract viewers and provide programming that is responsive to the community's real interests and concerns.

Respectfully submitted,

BELO CORP.

By: /s/

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April 19, 2005

BELO CORP.

EXHIBIT 1

Dean Martin Kaplan
Professor Ken Goldstein
Asst. Professor Matthew Hale
The Norman Lear Center
USC Annenberg School for Communication
3502 Watt Way
Los Angeles, CA 90089

February 17,2005

Dear Marty, Ken, and Matt,

I am writing because I am troubled by the findings of the Lear Center study "Local News Coverage of the 2004 Campaigns". KING-TV believes in covering politics. We have a full time political unit. We do a weekly political show. We host and televise political debates. And we give free airtime to candidates. But, little of our commitment to political coverage shows up in the study. While I agree that we can and should do more, I wonder why the study does not seem to accurately portray what we did in 2004.

To begin with, it seems odd to do a study on broadcast political coverage that only looks between the hours of 5:00 p.m. and 11:30 p.m. The decision to exclude Sunday daytime arbitrarily excludes a time period where viewers expect to see politics. This study ignores the contributions of programs like *Meet the Press*, *Face the Nation*, and *This Week*. For KING, the time limitation means much of the work by our political unit is never even considered. We do a weekly political show that airs at 4:30 p.m. on Sundays, just ahead of the local news. (The show also airs at 10:30 p.m. on our duopoly station, right after the top rated 10 p.m. newscast in the market, which was also excluded from the study.) In October, this political show featured a debate for Congress, a debate for state Attorney General, an Ad Watch special, and a special examining the issues in the most significant state and local races. Stations also do a significant amount of political coverage on morning shows, where there is more time for extended discussion. At KING, we did live interviews with candidates for Governor and Congress on our morning shows in October. But, none of that work is reflected in the study.

The data collected seems to have some significant gaps, especially when it comes to non-Presidential coverage. KING did a prime time

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gubernatorial debate on October 13 that was missed by Lear. KING provided eight minutes of free candidate time following our 6:30 p.m. newscasts in October. The Lear report says it only observed one of those segments. (The segments were not credited as part of news coverage either.) In 2004, the Belo stations tracked their political coverage for a corporate report, making it relatively easy to compare our records with what was captured in the Lear Center study. I spot-checked some of the non-Presidential stories we did and found a surprising number of them missing. For example, on October 9, we ran a 3:00 piece at 5:30 p.m. with excerpts from the Attorney General debate on our weekly political show. That story is not in the Lear database. On October 20, we did a story about a Supreme Court justice running for re-election who was being opposed by families of murder victims, which I can't find in the Lear archive. We did several stories on state Initiative 892, which would have allowed expansion of slot machines, but none of them were logged. In fact, the archive only lists five KING stories about ballot initiatives, many fewer than we aired in October. We did six locally produced Ad Watches during the reporting period, but only got credit for four. This list does not represent an exhaustive comparison of our records and the Lear database. It is just a spot check of local stories.

I also question some of the story focus coding that was done. While the study concludes KING did more issue oriented stories than other Seattle stations, it says we still focused more on the horse race than the issues. Regardless of the study's conclusion, I know that was not the case. Again, a spot check of the Lear archive reveals some curious coding. Story 2004-Seattle-NBC-279-46-05 was the story we did on our late news after the October 5 VP debate. It is coded as "horserace". The anchor intro included the results of a poll we did after the debate, which took :18 to report. The remaining 2:23 of the story was about the substance of the debate. Similarly, story 2004-Seattle-NBC-301-34-03 is about the final debate between the two candidates for Attorney General. It is also coded "horserace", even though the first 2:10 of the story is about the issues in the debate. The reporter tag mentions the latest poll results. Story 2004-Seattle-NBC-295-46-09 was a typical story that we did on the Presidential race. The first 1:06 was purely issue oriented, with sound bites on Social Security savings accounts and stem cell research. The last :06 said polls show the race is close in the battleground states. This story was coded "strategy". It should have been "issue". Perhaps, a weak case could be made for "horserace" because there was a brief mention of poll results at the end. But, there was absolutely nothing about campaign strategy anywhere in this story. Perhaps these examples are anomalies. But, I did not run across any stories that Lear coded as issue-oriented when they were actually about strategy. The study also relies on story counts rather than time allocations for most of its

comparisons, which can distort the results. On a day when we announce poll results, there may be three 15-second stories with the polls for President, Governor, and US Senate. Then, we do a 3:00 Ad Watch or some other issue-oriented story. The study concludes only 25% of our coverage was about issues that day - one story out of four. But, 80% of the time was spent on issues, a far different measurement and, I believe, a more accurate one.

A couple of other thoughts; The report says a typical half hour of news included 3:11 of political coverage, which is considerably better than I expected, with more politics than crime. Also, the definition of "local" pretty much guarantees it will be a small percentage of the story count, especially in a state like Washington. Cities, counties, and school districts here purposely avoid holding elections on the Presidential cycle. So, the only races that qualify as local in Seattle are Congress, the state legislature, and a few ballot measures. Very few of these races are competitive and given the small number of people in our viewing area who are eligible to vote in any given legislative race, there needs to be some other compelling factor about the story that makes it of interest to those who do not live a particular district. Under those circumstances, getting a local percentage anywhere near 10% is quite remarkable.

Again, there is certainly more that KING and other broadcasters can do to help inform the public about politics and government. But, it does not help to inaccurately under-represent our current efforts. In fact, in the current regulatory environment, such a portrayal could end up damaging broadcasters who believe in practicing civic journalism.

Thank you for your attention to this matter and we look forward to your response.

Pat Costello
Executive News Director
KING-TV
Seattle, WA

Peter O'Connell
Executive Producer
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EXHIBIT 2

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Who Can Be Trusted? – A Seminar On Sourcing
April 22, 2005
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9:00 am
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USC ANNENBERG ANNOUNCES WINNERS OF THE WALTER CRONKITE AWARD FOR EXCELLENCE IN TELEVISION POLITICAL JOURNALISM

Television journalists from national, local, public and cable networks honored for innovative, issue-based coverage of the 2004 campaign

Contact: Michele Raphael, 213-821-1284

LOS ANGELES, March 9, 2005 — Proving that good political coverage can make great television, the USC Annenberg School for Communication today announced the winners of the **USC Annenberg Walter Cronkite Award for Excellence in Television Political Journalism**.

The winners of the 2005 USC Annenberg Walter Cronkite Award for Excellence in Television Political Journalism are:

Station Group:

- **Hearst-Argyle Television.** Hearst-Argyle Television won its third consecutive Cronkite Award for "its real commitment to political coverage when so many other station groups avoid that coverage altogether," wrote the judges, who added, "Hearst-Argyle not only gave time to issues but made sure that reporters gave those issues substance and explained them clearly to viewers."

Broadcast Network:

- **NBC News' "Meet the Press."** Winning its third consecutive Cronkite Award, "Meet the Press" was honored for Tim Russert's "hard-hitting, well-researched interview with President Bush." Judges described the interview as a strong piece of issue-oriented journalism.

Local Station, Large Market (three winners)

- **WCVB, Boston.** WCVB was honored for its candidate-oriented reporting and its effort to cover issues important to its hometown audience. The coverage was "thoughtful, well-written and issue-based." WCVB was also a 2001 winner.

- **WFAA, Dallas.** WFAA won a second consecutive Cronkite Award for its "continuing commitment to expose political issues and candidates to viewers." WFAA covered both the local and national aspects of the 2004 races, and it created a unique partnership with another station in the market to provide free air time for candidates.

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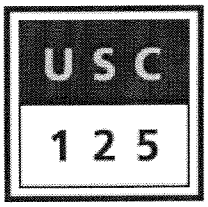

- **WFLA, Tampa, Fla.** WFLA won its second Cronkite Award for "the impressive amount of resources it committed to election coverage," wrote the judges. The station provided "substantial reporting on local issues, most notably the U.S. Senate race in Florida" and "great reporting techniques and enterprise journalism evident in stories on felon voting lists."

Local Station, Medium Market

- **Wisconsin Public Television.** Wisconsin Public Television won its second consecutive Cronkite Award for "demonstrating its thorough knowledge of the candidates, the state and the issues." The station's "Reality Checks" adwatch series, its "Where in Wisconsin" issue series and its debate coverage indicate "the depth of its commitment to political coverage."

Local Station, Small Market

- **KYTV, Springfield, Mo.** KYTV won for the "quality and depth of its reporting, rarely seen in even much larger market stations." The station's "commitment to informing voters is demonstrated in lengthy, carefully balanced pieces that display a willingness to travel and dig to get the story," wrote the judges.

Local Cable News Station

- **6News, Lawrence, Kan.** With the resources of a station that reaches approximately 30,000 homes, 6News produced "compelling, candidate-oriented political coverage that informed its voters about local, hot-button issues," judges wrote. "6News proved that resources do not need to be an obstacle to well-produced political coverage."

Individual Achievement (three winners)

- **Robert Mak** (reporter) and **Mike Cate** (producer), **KING-TV, Seattle.** Mak and Cate won their second **Cronkite Award** for "thorough and balanced coverage, good writing, and excellent reporting and producing."

- **Katie Moore**, **KOAA-TV, Colorado Springs, Colo.** Moore was honored for "her wide breadth of reporting, including in-depth candidate profiles, a two-part series on religion and politics, and Truth Checks."

- **Randy Shandobil, KTVU-TV, Oakland, Calif.** Shandobil won his second Cronkite Award for "solid writing and bold coverage." Judges were impressed by "his well-researched, issue-based stories and his ability to make complex issues easy to understand."

Offering praise for the winners, legendary broadcast journalist **Walter Cronkite** underscored the importance of good political journalism to our society.

"At a time when the legitimacy of journalism is under attack, and when economic pressures threaten quality and reward sensationalism, it is heartening to me that there are broadcasters around the country who remain committed to getting it right, making it compelling and serving the public interest," said Cronkite. "There is no better way to strengthen American democracy than to help citizens understand what is at stake in political campaigns."

Judges evaluated entries for work covering the 2004 elections. They gave special consideration to innovative, issue-focused reporting that informed viewers about their electoral choices, and that helped them understand ballot issues, the candidates involved, and how electoral choices will affect their lives.

The distinguished panel of judges included **Geoffrey Cowan**, dean, USC Annenberg School for Communication; **Patricia Dean**, associate director, USC Annenberg's School of Journalism; **Nancy Platt Jacoby**, veteran television news producer; **Judy Muller**, journalism professor, ABC News correspondent and NPR commentator; **Adam Clayton Powell III**, former radio and television news producer and

executive; **Heidi Schulman**, former network news correspondent and producer; and veteran broadcast journalist **Sander Vanocur.** Cowan underscored the School's commitment to honoring and supporting journalism at all levels.

"The judges were especially impressed by the winners' commitment to covering local campaigns," said Cowan. "In a year when the Presidential race dominated national and local news, it's great to be able to shine a spotlight on reporters, producers and stations that put a priority on local races and local issues."

In September 2005, USC Annenberg's Western Knight Center for Specialized Journalism will convene a special symposium on political journalism featuring the Cronkite Award winners.

The biennial Awards have been administered since 2000 by USC Annenberg's Norman Lear Center.

About the USC Annenberg School for Communication
The USC Annenberg School for Communication, **annenberg.usc.edu**, is one of the nation's leading institutions devoted to the study of communication and journalism; their impact on politics, culture and society; and the preparation of students for professional success in these fields.

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