

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St. S.W.
Washington, D.C. 20554

October 20, 2007

Dear Ms. Dortch:

Re: MB Docket Nos. 02-277, 04-228, MM Docket Nos. 01-235, 01-317, 00-244 In the Matter of Quadriennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act; 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; Cross Ownership of Broadcast Stations and Newspapers; Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets; Definition of Radio Markets

Media Ownership Studies

The Communications Workers of America (“CWA”) submits this letter
in support

of the critique provided today by the Consumer Federation of America,
Consumers Union, and Free Press (“Consumer Commentators”) of the 10
deeply flawed studies in the media ownership proceeding.

CWA represents 700,000 employees in diverse industries, including
journalists, technicians, and customer service employees working in
newspaper and broadcast industries. CWA members depend upon a diverse
media both as workers in the industry and as citizens in a democratic nation.
CWA has submitted formal comments in this proceeding, and CWA leaders

and members have participated in many of the Commission's public hearings on media ownership.

CWA has reviewed the studies commissioned by the Commission, and concurs with Consumer Commentators that there are many methodological errors in the research, and therefore these studies cannot and must not provide a basis for sound policymaking. As Consumer Commentators' point out, many of the studies represent "junk science" designed to prove a foregone conclusion. Consumers Commentators' rigorous review of the studies makes the following important points.

- The Commission failed to implement proper peer review of the research in violation of OMB guidelines on implementation of the Data Quality Act. The Commission disseminated the research studies prior to the conclusion of peer review. The peer review itself did not comply with OMB guidelines. As a result, research errors were not corrected, and the studies should not be relied upon to formulate public policy.
- The three studies of newspaper-broadcast cross-ownership are methodologically flawed. When Consumer Commentators re-analyzed the data based on more rigorous statistical methods and correctly defined variables, they found that cross-ownership actually *reduces* the amount of local news available in the market, and that cross-ownership *does* matter in limiting viewpoint diversity.
- The Commission's dataset on minority and female ownership of broadcast outlets is simply not accurate, forcing the authors of the two studies on minority issues to abandon the FCC's dataset and use other databases. Consumer Commentators' efforts to construct an accurate census of minority ownership suggest that the FCC has missed between two-thirds and three-quarters of the stations that are minority owned. Thus, the Commission still has not conducted an accurate analysis of the impact of media concentration on female and minority ownership.

- The Nielsen survey of media usage patterns supports evidence that CWA, Consumer Commentators, and others have repeatedly provided to the Commission, namely that broadcast TV and newspapers remain the major source of *local* news for most Americans. A full 89 percent of respondents say traditional media re their first and second most important news source, while only three percent say alternatives are their first and second most important source of news. Relaxing the newspaper-broadcast cross-ownership limits would therefore do serious harm to the Commission's goals of promoting diversity, competition, and localism in the media.

Consumer Commentators have provided the Commission methodologically sound and independent analyses of the research studies. Having reviewed the studies, CWA strongly agrees with Consumer Commentators that the Commission must reject many of their findings which were based on erroneous methodologies. The issues of diversity, competition, and localism are too important to our democracy to make changes in media ownership rules based on flawed and inadequate research.

Respectfully Submitted,

Debbie Goldman
Research Economist

