FILED/ACCEPTED

NOV 1 6 2007

Federal Communications Commission
Office of the Secretary

00-168

Hawaii Chapter, Society of Professional Journalists
P.O. Box. 3141
Honolulu, HI 96802

Federal Communications Commission

FCC Localism Inquiry MB Docket No. 04-233

Thank you for allowing us to testify on Localism in the media.

You have the opportunity to ensure that public debate in this country remains robust -- not shackled by growing media companies and not controlled by a corporate official in some distant city who has no knowledge of the local market or the people who live there.

Loss of local control through large media companies does not serve the public -- and the craft of journalism.

This will most likely be exacerbated by concentration of media ownership through duopolies and crossownership. We have only history to show us that local news outlet control is reduced in large media companies.

The result of duopolies and crossownership is and will be reduction of staff. These cost savings would rob the public of good independent news – the cornerstone of public service – and help create localized media monopolies that could put businesses at an economic disadvantage by paying higher ad rates.

Consolidation is the problem – it robs not only the public of a soapbox for minority views, it reduces the competition in reporting the news – which ensures viewers get the best information available on a timely basis.

Media companies are obsessed about reducing costs, not only do positions go unfilled but experienced (and costly) reporters are substituted with beginning-level reporters. The end result is less substantial news report. Only the public suffers. This is not immediately discernible because it is impossible to gauge what stories an outlet missed because it had an inexperienced reporter who missed certain stories?

Rather than attempt to be more competitive in local communities, TV stations have tried to consolidate and cut costs to increase profit margins. In Hawaii, that has meant cutting local programming. Where certain public affairs programs once ran on weekend afternoons, they have now been relegated to public access television.Once, television stations felt they could put public affairs programs during unprofitable hours of the weekends. Now, those programs have been supplanted by infomercials, so there is little hope to see non-revenue shows reappear when a customer is willing to pay for that time. Where locally produced, and highly rated, magazine shows once ran in prime time, they have now been cut altogether as companies look to cut costs and improve the bottom line. Local news documentaries have largely become a thing of the past.

No. of Copies rec'd 0
List ABCDE

There is no doubt that local production is the most costly feature of a local television station and therefore, the biggest target of cost-cutting.

To date, Emmis Communications – which has a duopoly in Hawaii allowed through the FCC's waiver of the rules for more than four years -- has staff in KHON and KGMB – the only unconsolidated departments appear to be sales and news. How long will it be before those departments are consolidated?

Cameramen are being shared between the two Emmis Communications stations – particularly in sports coverage. There have been comments -- at first quizzical -- about how the sports footage of the two stations appeared identical, particularly during football season.

Competition is one of the crosschecks that help ensure local programming. If you reduce the amount of competition through duopolies or crossownership, it reduces the drive to come up with some new and different to show the public.

If you reduce the amount of outlets from which people can advertise – through duopolies and crossownership – you can drive up the cost of advertising,

While these problems exist on a small scale, duopolies or crossownership will make it much easier to consolidate and retrench.

Station owners tend to answer to their shareholders before they answer to their viewers. In many cases, stations fail to run local political or public affairs programs because they would require additional staffing. In addition, personnel usually asked to take on public affairs or political programming tend to be older, higher paid and more skillful. It is generally easier and cheaper to neglect such areas and instead devote all news or other local programs to crime, accidents or features.

Consultant reports have declared political coverage to be boring. In Hawaii, stations have adopted a "no officials" week because coverage of government was deemed not to be interesting. In the past few years, political or government reporters have been disappearing from local television stations. It used to be that the three television stations each had two state government reporters and a Honolulu City Halll reporter on staff. Three of four stations now retain a single state government reporter, and the City Council is now largely uncovered. One station has all but done away with state government reporting. A memo has circulated calling government reporting "BOPSA" or bunch of people sitting around. This trend will certainly carry through to the election season, where there has to date been only cursory coverage.

In September 2002, the primary election was not broadcast by one of the top four TV stations. KGMB chose to cover two national high school football powerhouses facing off against local teams. Would KGMB have had the confidence to broadcast sports instead of elections – if its sister station KHON hadn't been broadcasting the election all along?

While it is true, stations are opting out of a certain amount of network programs, many

are doing so not to promote local issues, but to air paid programs and infomercials.

In many radio markets, multiple stations are owned by the same company. However, there is generally one news operation to cover these many stations. That does not promote diversity of voices in a market because those many stations are hearing from a single voice. The trend is more troubling in television, where there are generally fewer voices in a single market. Many stations share newscasts, regardless of ownership, so viewers are being robbed of the possibility of hearing from another voice. With an increasing number of consolidations and duopolies, such sharing of newscasts will probably increase, thus two stations with profitable newscasts could become even more profitable by cutting one newscast and sharing resources with another station, and thus cutting a voice from the public. The commission should consider a rule prohibiting the sharing of news resources among the top four stations in a single market, regardless of ownership.

The FCC sets lofty ideals for TV stations to follow, but there is no way to ascertain that they are being followed – since no enforcement could be done without violating the First Amendment.

The commission should adopt standards encouraging a level of local public affairs or public service programming. These programs should be independently produced regardless of ownership of a station. It should not be acceptable to re-run another station's programming. In some cases, this could mean that a station could open its airwaves to public interest groups seeking to discuss topics rather than creating a news program.

If there are understandable standards and easily obtainable station reports, then the public will be able to complain about the lack of local programming.

As for disclosure, most people don't know anything about a public inspection file. It might be fruitful to require broadcasters to not only post the inspection files on the internet, but also to publish an abbreviated version in a newspaper of general circulation in the broadcaster's area.

Sincerely,

Emily Viglielmo

President, Hawaii Chapter of the Society of Professional Journalists