

NOV 13 2007

04-232

Comments on Media Localism
Federal Communications Commission
October 31, 2007

Federal Communications Commission
Office of the Secretary
Kim Gandy, President

National Organization for Women (NOW) Foundation

My name is Kim Gandy, and I am chair of the NOW Foundation, as well as president of the National Organization for Women, the nation's largest grassroots women's rights organization with over a half million contributing members. I appreciate this opportunity to address the Commission on the issue of broadcast "localism."

Special thanks to Free Press for their data collection and analysis of minority and female ownership of full-power radio and television stations, and to the Institute for Public Representation at Georgetown for their thoughtful legal analysis and advocacy. I have relied on both of these sources, in addition to NOW Foundation's letters and comments to the FCC, in preparing these remarks.

The Federal Communications Commission licenses the use of the public airwaves – worth hundreds of billions of dollars – at absolutely no cost. Free, to broadcasters, in exchange for serving the public interest in local communities. What that means, and how those local communities can best be served, is why we are here today.

My comments are based on four principles:

- First, programming needs of local communities are best served by local ownership.
- Second, this desirable local ownership, especially single-station ownership, is more likely to occur with female and minority owners
- Third, these local owners are being squeezed out by increased consolidation and market concentration, hurting both localism and media diversity efforts
- Finally, increased ownership by women and people of color will serve the interests of localism, in addition to increasing public access to this public asset – the airwaves.

If those points seem related, it's because they are.

First: Programming needs of local communities are best served by local ownership.

It's hard to argue with the obvious: Single-station operators who are headquartered in a community, and focused on that community, are better able to understand and to serve that area's needs than large conglomerates that are headquartered in another state or across the country. So increasing local ownership should be a goal in any effort aimed at increasing local content and community responsiveness.

But in case it's not obvious enough, there are numbers to back up the assertion that local ownership increases local programming. For example, according to comments filed by Consumers Union, a recently-surfaced 2004 study by the FCC demonstrated that locally owned and operated television

stations aired more local news content than their conglomerate counterparts, devoting an additional 20-25% of each half-hour news broadcast to local news coverage.

Second: This desirable local ownership, especially single-station ownership, is more likely to occur with female and minority owners.

Whether you're talking about radio or television, the median minority or female owner controls just a single station, and is headquartered in the community where the station is located, obviously serving the interests of localism. For example, radio stations owned by women are significantly more likely to be locally owned – 64.4 percent of the female owned stations are locally owned, compared to 41.6 percent of non-female owned stations.

Moreover, women are more likely to own a single station, thereby focusing programming on that community. In radio, for example, the majority of all female owners are single-station owners, and the proportion is even higher for women of color, with over 90% of Latina station owners and 80% of African-Am female owners having only a single radio station.

Third: Local owners are being squeezed out by increased consolidation and market concentration, hurting both localism and media diversity efforts.

These locally-based owners, especially those who own a single station, or one of a small number of stations, are being squeezed out of the market by increased consolidation and concentration, which makes it more and more difficult for them to compete with large conglomerates for desirable programming and advertising dollars. This has been borne out by many of the studies in front of you.

According to the FreePress study, the probability that a particular station will be female-owned or minority-owned is *significantly* lower in more concentrated markets. In fact, massive consolidation and market concentration is one of the key factors keeping women and people of color from increasing access to the public airwaves, and we urge this commission not to take any action that will increase ownership concentration, and in fact to do exactly the opposite.

Finally: Increased ownership by women and people of color will serve the interests of localism, in addition to increasing public access to this public asset – the airwaves.

Despite the fact that together we represent two-thirds of the country, women and people of color are woefully under-represented in media ownership. Women own 5% of television stations and 6% of commercial radio stations. Racial or ethnic minorities own about 3% of television stations, and less than 7.7% of radio stations. Unfortunately most studies do not allow us to look separately at minority female ownership, which would shed additional light on the subject.

So in order to increase service and responsiveness to local communities, particularly the underserved audience of women and people of color, the FCC must remedy the serious under-representation of women and minorities in broadcasting.

Before the Commission makes any decisions regarding relaxation of the ownership rules, it has an obligation to implement proposals designed to ensure that both minorities and women are given meaningful opportunities to own broadcast radio and television stations. NOW urges the Commission to focus more attention on the lack of female and minority broadcast ownership and to develop rules and policies designed to remedy this growing problem.

As we have pointed out in previous Comments, there are numerous public interest benefits to increasing minority and women's ownership levels, including an increase in program diversity, a break down of stereotypes, better service for underserved segments of the population, increased civic participation, and remedying past discrimination against women and minorities who were not included in the government's initial free hand-outs of the broadcast spectrum.

The Commission has repeatedly found that it is essential to a democracy for the electorate to have access to divergent viewpoints on controversial issues. Yet, few of the FCC's commissioned studies even attempt to directly address whether the current levels of media concentration provide the public with a true diversity of views on controversial issues. Nor do any of those studies examine the impact of the transition to digital taking place that allows both television and radio stations to broadcast multiple program streams.

Finally, in light of recent events, I believe that the paltry level of female ownership affects the coverage of women's issues and how women are portrayed in the media.

Increasing the diversity of ownership would increase diverse content, and that would serve all of us. We look forward to working with you toward that end.

DOCKET NO. 04-233

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