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November 13, 2007

ORIGINAL

Secretary Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 - 12th Street, SW  
Washington, D.C. 20554-0004

RE: MB Docket No. 04-233: Localism Proceedings

Dear Secretary Dortch:

The purpose of this letter is to formally provide the Federal Communications Commission (FCC) with the forthcoming written comments as part of the FCC's Localism Proceedings. This letter's contents should be filed in MB Docket No. 04-233.

When the issue is localism vis-à-vis America's local broadcast media, one might as well be talking about the conquests of Julius Caesar. It's all history. Far too many decades have passed since local broadcast media has had any legitimate and relevant connection with the communities it saturates. Since the U.S. government's first steps to license the public airwaves, businesses have been aggressively pursuing cross-media (i.e., newspaper, radio and broadcast) ownership and control in single markets. Judging by today's abysmal anti-localism media environment, they have succeeded mightily—all the while destroying diversity, squelching dissenting views, cheapening the democratic process, and hastening the corrosion of this country's communities from the Atlantic to the Pacific, from Canada to Mexico. Sound unfair? In truth, it isn't. Just consider this one example: Phoenix, Arizona is America's fifth largest city and here's the line-up for the dominant out-of-market broadcasters who dominate:

Station	Affiliation	Owner	Owner Location	Comments
KPNX	NBC	Gannett Company	McLean, Virginia	Owner is 2,355 miles away from Phoenix. Gannett also owns Arizona's largest newspaper: <i>The Arizona Republic</i> .
KPHO	CBS	Meredith Corporation	Des Moines, Iowa	Owner is 1,455 miles away from Phoenix.
KTVK	N/A	Belo Corporation	Dallas, Texas	Owner is 1,068 miles away from Phoenix.
KSAZ	Fox	News Corporation	New York, New York	Owner is 2,462 miles away from Phoenix.
KNXV	ABC	E. W. Scripps Company	Cincinnati, Ohio	Owner is 1,858 miles away from Phoenix.

On average, the owners of the five major broadcast companies licensed in the Phoenix, Arizona market are located 1,840 miles away from their constituents. In addition, all five are very large

media conglomerates dominating other media outlets including daily and weekly newspapers, magazines, and broadcast radio. Talk about media concentration!

Of course, the “Phoenix Broadcast Five” (i.e., KPNX, KPHO, KTVK, KSAZ and KNXV) do tout their distorted view of localism. For example, offering to have one of their photojournalists and a local expert meet the public in a Phoenix grocery store parking lot to check the safety of the child safety seat in your car (KPNX). Or, collecting canned food for a local charity (KTVK). Or, offering a “Shred-A-Thon” for those pesky credit card offers stuffed in your mailbox (KPNX). Or, giving you a “front row seat” for the local 4th of July fireworks show they are sponsoring (KPHO). This is a sick view of localism and certainly not what should pass for acceptable.

Not one of the “Phoenix Broadcast Five” will tout local events that could in any way upset the status quo. No, these broadcasters are determined to ignore anyone and any organization agitating for a change to the way things are. Based on their conduct, localism is a threat to their monopoly and yet, localism is what a community is all about. Localism is what allows communities to thrive, to be culturally and politically rich, to find a way through the homogenized molasses-like morass that those with power (in this case the local broadcasters) seek to inundate us with in order to preserve their monopoly and profitability.

In addition to competition and diversity, promoting localism is, in fact, a key goal of the FCC’s media ownership rules. Yet time and again, the FCC seems oddly determined to do all it can to bury, ignore, and ultimately kill, **real** localism. This is a perversion of the FCC’s role, it’s responsibilities, and the Communications Act. From the FCC:

*“FCC Regulation of Broadcast Radio and Television.* The FCC allocates new stations based both on the relative needs of communities for additional broadcast outlets and on engineering standards that prevent interference between stations. Whenever we look at an application -- whether to build, modify, renew or sell a station -- we must determine if granting it would serve the public interest (emphasis added). This is required by the Communications Act. We expect stations to be aware of the important problems or issues in their communities and to foster public understanding by presenting some programs and/or announcements about local issues (emphasis added).”

Well, there it is. Serving the public interest. Based on years of watching the local broadcast muck delivered by the “Phoenix Broadcast Five”’s out-of-market corporate media conglomerates, they consistently ignore their obligation to serve the public interest. They are ignoring localism and that is stating the case mildly. Child safety seat check-ups aren’t acceptable localism. Canned food drives aren’t acceptable localism. A “Shred-A-Thon” isn’t acceptable localism. Televising their 4th of July fireworks show isn’t acceptable localism.

Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about Arizona’s illegal immigrant plague? Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about Arizona’s severe air pollution problems that have the U.S. EPA about to go for Arizona’s jugular? Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about the local failing education system? Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about Phoenix City Council district elections? Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about the severe drought affecting this area? Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about the state’s low wage economy and what to do about it? Where are the (more than token, if any) “Phoenix Broadcast Five”’s local broadcast programs about urban sprawl and the lack of

adequate public transportation? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the controversy over the country's largest animal testing (as in pharmaceuticals and cosmetics) firm moving in to one of the area's suburbs? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the state's fiscal trouble now that the real estate bubble has burst? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about why this state lags behind New Jersey (of all states!) in the use of solar energy? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the impact of rising energy costs on families and the larger community? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about Maricopa County's severe homeless problem that never seems to abate? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the third of Arizona's residents who cannot afford health care services? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the lack of affordable housing in the state? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the area's legendary income disparity between the very small group of Arizonans with tremendous financial resources and the great majority of Arizonans trying (unsuccessfully) to survive on a fraction of the wealthy's largesse? Where are the (more than token, if any) "Phoenix Broadcast Five"'s local broadcast programs about the ever growing urban heat island effect and its impact on life of all kinds and the local economy?

It is time for the FCC to finally stop dragging its feet on broadcast localism and finally return to its mission of serving the nation, not just bowing to the corporate broadcast media conglomerates. Concentrated broadcast (and other) media ownership has proven to be toxic to communities, toxic to minority groups, toxic to non-white people, toxic to the environment, toxic to the non-wealthy, and finally, toxic (fatal even?) to the democratic process. It is time to force the issue of broadcast localism, **real** broadcast localism. Business only understands the almighty dollar. It is time for the FCC to place broadcast localism at the very top of the agenda and act on it in a responsible, ethical and timely way. It is time to force **real** broadcast localism or once and for all remove the lips of the corporate broadcast media conglomerates from the public breast. Our communities and democracy will be the price we pay if the FCC continues to nurture the broadcast media corporations and unnecessarily place its bureaucratic boot on the neck of broadcast localism. Let's make the effort count this time.

Sincerely,



Thomas M. Swett

**cc:** Rebecca Lockhart, Federal Communications Commission (two copies)  
John McCain, United States Senate  
Jon Kyl, United States Senate  
John Shadegg, United States House of Representatives  
Best Copy and Printing Inc. at Portals II (two copies)