

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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Inquiry Concerning the Future of Media and)	GN Docket No. 10-25
Information Needs Of Communities in a)	
Digital Age)	
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Preserving the Open Internet)	GN Docket No. 09-191
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LOOKING TOWARD THE FUTURE OF MEDIA
Comments of Georgetown University M.A. Candidates

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Introduction

In considering the future of media and information in the "digital age," it is necessary to understand how numerous cross-cutting factors impact these two issues simultaneously. It is for this reason that addressing the individual questions posed in the FCC's call for papers proves particularly challenging -- for a question regarding youth consumption of media may be intricately connected to an inquiry about user-generated journalism. Thus, in the comments below, we have organized our thoughts on both the *impacting* and *impacted* factors of the new media landscape with the overlapping nature of the individual forces in mind.

We believe that many of the key forces can be discussed within the context of three overarching themes: the emergence of new "content delivery" and "content providers;" the changing ways in which information is consumed; and the important role of net neutrality in allowing media to truly demonstrate the FCC's stated vision of diversity, competition and localism.

I. New Content Delivery and the Ubiquitous Content Provider

When considering the meaning of "content delivery," it is necessary to accept that we no longer live in an age where the medium should dictate the content. In short, the device used to deliver the content to the user should not dictate its type - for anything can and will be accessed anywhere at any time. There is no longer strictly Cable/radio/newspaper/Satellite/Internet-specific content. Any content will be accessible via any means, and a failure to recognize the cross-cutting nature of information technologies will prove detrimental to the goals of advancing American media. For example, a traditional TV show made by a large content provider will inevitably be

accessible not only via a television, but also a computer or smartphone. Old media will be forced to make this move in order to remain competitive with new content creators that do not adhere to old media rules of audio/video/print or any other strict categorization of content or delivery.

Segmenting content regulations based on physical delivery is a dying model and its continuation threatens to stagnate our role in the future of information delivery. Put differently, an attempt to keep this model intact is to perpetuate an outdated mentality – and may have disadvantageous impacts on attempts for progress for society at large. To help facilitate use and acceptance of new content we may refer to it as "Internet TV" or an "e-book," but those marketing terms will begin to diminish as users realize that the content they are using is viewable by any means. You may listen to "radio" on a television or read a "book" on a smartphone and, over time, this will change how users interact with the previously non-transferable nature of content.

If our understanding of "content delivery" is changing, then what constitutes a "content provider" must change as well. This becomes clear when considering the wide-range of individuals able to contribute to media content today compared to previous decades. Traditional content providers fear an impending loss of control over content creation¹ - and rightfully so. The Internet - and technologies built upon it - has enabled individuals, groups and businesses around the world to compete on a global scale with well-entrenched content empires. While this is not to suggest that the American public will cease watching traditional programming (such as sitcoms and soap-operas), rather, their choice of what to watch and where to watch it will continue to increase

¹ “Anti-Counterfeiting Trade Agreement - Wikipedia.”

exponentially. For example, your neighbor may produce a podcast with more consumers than a local cable channel and a coworker may be a budding international star thanks to her blog.

This new perception of who can produce and provide media demonstrates how the Long Tail has taken effect on content creation; there are now millions of potential media giants waiting to get a consumer's attention.² We suggest that, while not every new creator will reach his or her desired level of success, the most important impact is that individuals are able to *attempt* to do so. Further, new providers have already pushed the envelope of innovation and will continue to do so in the future. For example, the Long Tail has already brought us new international content conglomerates such as TWiT, Digg and Vimeo. Such new providers are challenging traditional content creators by providing cutting-edge innovation and nuanced era-appropriate business models. Indeed, many of the success stories from this global enablement of innovation and competition have targeted niche markets with a very specific purpose or locality. However, this will begin to change as the coming generations create new content for broader audiences with a national and global appeal. While they will not completely displace traditional providers, they will indeed compete for consumers' time - and as we know, fair competition produces innovation, profit and immense benefits for society.

Action Recommendations: It is necessary for policymakers to *proactively* consider and adapt to the changing perception of content delivery and creation as it relates to the future of media and information. To move forward and continue American dominance in content-creation, we must adjust our understanding of the words "content delivery" and "content provider" to better reflect the new reality of those behind the scenes of the information available to consumers. Ensuring that the necessary officials remain equipped with up-to-date information about the next

² C. Anderson, *Long Tail, The, Revised and Updated Edition: Why the Future of Business is Selling Less of More*, Hyperion, 2008.

emerging technology or rising content-providing star will allow regulations to be made within the context of a forward-thinking model. Public workshops, trainings, seminars and regular updates must become mandatory for those writing the regulations to avoid creating policies on old or diminishing information delivery and provider structures.

The government and supporting agencies must also realize that the future lies in new models and not through continuation of old structures. There are numerous examples of traditional businesses striving to sustain old models in spite of the potential of innovative entrepreneurs who are breaking into the field. AT&T declined the offer of ownership of the packet switched network³ built by ARAPA (the Internet) because it was incompatible with their circuit switched network⁴, the VHS was thought to be the end of the entire movie industry, and the newspaper was the end of the town crier. The technologies and industries brought forth from making and allowing transitions to these new models have indeed propelled us forward.

II. Consumption

Just as the qualities of those behind the production and delivery of content have changed, the expectations and habits of consumers have grown in ways previously unimaginable. The changes in how consumers consume are particularly pronounced when considering three main points: youth consumption; an increasingly international vantage point, and; polarized information sources.

First, young people today have grown up in a hyper-stimulated, information-laden world where media is available at virtually any moment from a wide-range of sources. We believe the general gap between young and old consumption habits and expectations

³ Lawrence Roberts, "The Evolution of Packet Switching," Nov. 1978.

⁴ "Cybertelecom :: AT&T History."

is closely related to the changing nature of content delivery. With each new year comes an enhanced ability for young people to become accustomed to new content-delivery technologies and to adjust their expectations about what the newest handheld device will deliver. Further, growing up in a Twitter world, young people's expectations are that information can and will be delivered in short, easy-to-digest segments.

Action Recommendations: As policy-makers consider the future of media, understanding the technological capabilities and expectations of younger generations will allow policies to reflect how the youth envision the state of information consumption in the years to come. Engaging the public through calls-for-papers presents only one mechanism by which policymakers can gain feedback on how consumption trends continue to evolve. The FCC and other key players in information policy should explore ways of enhancing their presence on the platforms the younger generation are using, as it may prove useful to try to more actively interact on a new-age medium. The Census 2010 campaign provides an impressive example in raising interest in an issue through various mechanisms.⁵ Having the FCC on Facebook is a strong start -- but furthering the organization's social media presence for information-gathering and technology-familiarity is a must. We strongly believe that some comment streams on Facebook, Google Buzz and Twitter may be of more quality than the traditional call for papers and have the undeniable powerful attribute of being dynamic rather than static.⁶⁷⁸

A second consideration in the changing consumption trends is the ability for cross-border information flows. The source and content of the information consumed has an increasingly international component due in large part to the point discussed above regarding the ways in which information can be shared through new media platforms existing largely outside of mainstream media. YouTube videos uploaded in Turkey can bring information to consumers in Kansas, connecting global citizens like never before.

⁵ United States Census. "US Census 2010." *United States Census Bureau*. [Online]. Available: <http://2010.census.gov/2010census/>. [Accessed: March 26, 2010].

⁶ <http://yro.slashdot.org/story/10/01/25/1854241/SourceForge-Clarifies-Denial-of-Site-Access>

⁷ <http://blog.facebook.com/blog.php?post=196629387130>

⁸ <http://search.twitter.com/search.atom?q=+%23bbplan>

This connectedness most certainly introduces a myriad of positive impacts - such as the potential for individuals to become immersed in the content they are consuming. The most obvious demonstration of such involvement is seen in the online actions taken by individuals across the globe in reaction to the Iranian election in Summer 2009, subsequently deemed by some the "Twitter Revolution."⁹ However, it is important to consider the potentially negative impacts and react as necessary -- for example, what are the ramifications for loyalties?

Action Recommendations: Policymakers must consider the international context of information in writing and revising policies. No longer should policy be regarded with a "national media conglomerate" mentality. Instead, those creating standards for within America's borders must consider how it will be impacted by a global information ecosystem. For example, a policy that limits access to certain content may be easily bypassed by consumers turning to non-traditional media platforms to obtain that information from international providers. Further, efforts should be made to maintain to the place and stature of domestic media outlets. The ability to strengthen ties to more distant lands can perhaps distract from important information coming from one's own locality. Consumers will use content that is the most readily available and "trustworthy" as they view it. If international content is more accessible to Americans due to antiquated laws on distribution of local/national content, then Americans may naturally begin to build relationships and loyalties with creators of the outside content. Content creation and its distribution is, in this way, *soft power* that fosters ties to one's domestic surroundings.

Third, individuals are now able to selectively seek out information from only the sources that re-affirm their existing ideas, thus reinforcing a polarized climate inspired by segmented news sources. This again echoes the points above on the increasing ease with which anyone can posit their ideas as "media," but here we focus on the consumer side. For example, televised information previously allowed consumers of virtually all opinions to participate in a form of "appointment television" - nearly all viewers

⁹ Rutenberg, Jim. "Behind the War Between White House and Fox." *The New York Times*. [Online]. Available: <http://www.nytimes.com/2009/10/23/us/politics/23fox.html>. [Accessed: March 26, 2010].

consumed the same information from the same sources at the same time. Today, however, individuals can identify niche news sources that allow "news information" to be delivered through voices that echo their own thoughts on a given subject. This contributes to a segmented society and furthers a future in which media no longer serves as a "common meeting ground."¹⁰ For example, those who get their news media from MSNBC and Mother Jones likely have a different set of ideas than those who strictly watch Fox News.

Action Recommendations: Pointing to a specific "action recommendation" proves difficult in this point. However, we feel that "acknowledgement" and "awareness" of the issue as a problem provides a necessary first step and serve as the actions to which we will point. Policies must reflect an awareness of the potential ramifications of an overly segmented platform. As we recently saw with the controversy surrounding the Obama Administration's open and critical dialogue with the Fox News Network, the biases even among the most powerful are reaching a point of unavoidable intrusiveness -- from interactions between laypersons to the highest echelons of government.¹¹ Policies that recognize and open discussion about the reality of this segmentation are necessary to help drive the direction of opinion-driven information.

III. Net Neutrality

In discussing the points related to content delivery, creation and consumption, a key factor that applies to all of them (and, in this way, the future of media) is the concept of Net Neutrality. We suggest that a theme that underlies all of the trends in the future of information is a staggering degree of openness – and this nondiscriminatory mindset must be applied to the networks on which the content is provided and consumed in order for access to remain unfettered. Speaking more generally, if indeed the goals of American

¹⁰ Katz, Elihu. "And Deliver Us From Segmentation." *Annals of the American Academy of Political and Social Sciences*. vol. 546, pp22-33, July 1996.

¹¹ Westphal, David. "The Fox News-White House Feud." *The Washington Post*. [Online]. Available: <http://www.washingtonpost.com/wp-dyn/content/discussion/2009/10/13/DI2009101301745.html>. [Accessed March 26, 2010].

media are to ensure "all Americans have access to vibrant, diverse sources... [that] enrich their lives; their communities and our democracy," then the most critical step is *ensuring access*.

Network Neutrality is essential to ensure that the new wave of content providers enabled by the Internet will have fair access to users. Allowing ISPs to discriminate and provide preferential traffic flow based on deals with specific content providers will accomplish one thing only: re-affirming the status quo and continued profitability of traditional content providers, and bringing to a complete halt the waves of innovation we have seen in content and new media. If ISPs are able to decide what content gets preferential treatment based on business deals, they will by nature take the deal which offers them the most profit. Justin.tv cannot compete financially with Disney, Boxee does not have the legal team that Comcast does, and neither do any of the budding entrepreneurs around the world who have innovated and would continue to change the media/content landscape forever. Let one thing be clear, this is not a battle for Google or other large new-age content providers, aggregators or brokers; this is for the small shops and dreamers - this is for Main Street USA. The fact that Google and other large profitable organizations benefit from Network Neutrality should not be the basis of this decision. The Internet has enabled the Long Tail of content providers, and allowing preferential treatment of content based on profit would bring this to an end.

Action Recommendations: The United States cannot make Network Neutrality decisions in the context of it being a domestic issue; it is very much global by nature. If the United States allows content discrimination by ISPs, then other countries will follow suit by systematically preferring their own home-made content over that of the United States or other foreign nations with discriminatory non-network neutral policies. We need to think long term about what benefits the entire content industry in the United States - both large and small - and that is unfiltered Net Neutral access to and from people around the world. The rules we

set will resonate globally, and short-term profit-only thinking will bring an end to American content dominance around the globe in the long term. The ramifications would be detrimental to our political and economic status.

Conclusion

All three of the points in this memo must be addressed in tandem to ensure an environment that is suitable for continued growth and innovation. Creation, consumption and neutral access are no longer local in nature but are distinctly global, just as anything else on the Internet. It is for this reason that future FCC “Calls for Comments” should strive to gather information regarding the international realm – reaching beyond the single mention of cross-border issues in the document addressed here. Further, our future policies must more closely resemble flexible frameworks to gently nudge along the future of media and content than the current system. Doing so will bring to a halt any potentially catastrophic issues related to the points in this document. Most importantly, *the new policies must be capable of withstanding the test of time while allowing for incremental modification.* Rather than being entirely built upon, around and within the limitations of today's technologies, the policies should reflect the understanding that things will change dramatically and not be in a singular state for 5, 10, or 15 years. With the understanding that innovation occurs in increments, we can build policies that *understand* and encourage innovation. This can be accomplished by changing the way we view content providers, consumers and access forever, with the ideas and actions described above.

Respectfully Submitted,

_____/s/_____

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