

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Examination of the Future of Media and	)	GN Docket No. 10-25
Information Needs of Communities In a Digital	)	
Age.	)	

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**COMMENTS OF  
THE RADIO TELEVISION DIGITAL NEWS ASSOCIATION**

The Radio Television Digital News Association (“RTDNA”), by its attorneys, hereby submits its comments in response to the Public Notice issued by the Federal Communications Commission (“FCC” or “Commission”) in the captioned proceeding.<sup>1</sup> RTDNA is the world’s largest professional organization devoted exclusively to electronic journalism. RTDNA’s membership includes news executives in broadcasting, cable and other electronic media in more than thirty countries.

The Commission has instituted this proceeding, in part, “to assess whether all Americans have access to vibrant, diverse sources of news and information that will enable them to enrich their lives, their communities and our democracy.”<sup>2</sup> Because a drive for some sort of regulatory (or de-regulatory) action is implicit in this broad initiative, RTDNA urges the Commission to hold true to its commitment not to run afoul of the First Amendment or otherwise to do harm. Any regulation that touches upon the content of broadcast news or intrudes into broadcast newsrooms is perilous for our democracy, rife with the potential for unintended consequences,

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<sup>1</sup> *FCC Launches Examination of the Future of Media and Information Needs of Communities in a Digital Age*, Public Notice, DA 10-100 (rel. Jan. 21, 2010) (“Public Notice”).

<sup>2</sup> *Id.* at 1.

and wholly unnecessary. Local radio and television stations are alive and well and functioning at a very high level. As they have for decades, local broadcasters play a sustaining role in their communities, including as lifelines during times of emergency or crisis. Traditional over-the-air broadcasters are using synergistic approaches among multiple stations to create more news offerings, they have deployed innovative new digital and Internet technologies to disseminate local news and information to their listeners and viewers, they are facilitating conversations in their communities on air and on line, and they continue to be the preferred source of news for most citizens.

The midst of the digital media revolution is no time for rash government intervention. Local broadcasters are uniquely positioned to assess the wants and needs of the citizenry, and they are constantly evaluating how best to serve their communities—not because of a government edict, but because doing so is the key to their survival. As a practical matter, additional regulation will not further the goals the Commission seeks to achieve but will turn its efforts upside down by draining broadcasters' resources and by forcing broadcasters to base editorial decisions on the FCC's private notions of what the public ought to hear rather than the desires of the audiences broadcasters are licensed to serve. Moreover, radio and television stations compete with a plethora of traditional and new media platforms unencumbered by regulation. Government policy should be designed to foster competition, not to unfairly handicap certain marketplace participants.

RTDNA has demonstrated its willingness to participate in a conversation among various constituencies about how broadcast journalists are faring in an increasingly competitive and diverse market for news and information. If, however, this proceeding has been launched to lay the factual groundwork for regulatory action that would touch upon journalists' editorial

discretion or otherwise encumber their ability to do their jobs, then the FCC should be aware that the same drive that compels journalists to keep their communities informed and hold the government accountable will also be applied to the defense of our country's centuries-old tradition of a free and *independent* press.

## **I. THE STATE OF BROADCAST JOURNALISM**

Since the Commission deregulated radio broadcasting in the early 1980s, local news and public affairs programming has—in the Commission's own words—"proliferated,"<sup>3</sup> and RTDNA's own research supports this conclusion. Over the past 16 years, RTDNA has commissioned Bob Papper, the Lawrence Stessin Distinguished Professor of Journalism and chair of the Department of Journalism, Media Studies, and Public Relations at Hofstra University, to conduct annual surveys of broadcast television and radio news operations.<sup>4</sup> The collective weight of Papper's research establishes several trends within the broadcast industry. Despite two economic recessions over the last decade and an unprecedented explosion in the number of competing outlets for news and information, broadcast journalism is very much alive and continues to provide a vital service to the public, for free. In the face of competition from national and international media, broadcasters are providing more local news and information programming as a way of distinguishing themselves. Moreover, broadcasters are leveraging their online and social media presence to augment and support broadcast products, not to replace them. Finally, advances in digital technologies are enabling broadcast journalists to provide better coverage of important issues at a lower cost and in formats that respond to market demands.

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<sup>3</sup> 2002 *Biennial Regulatory Review*, Report and Order and Notice of Proposed Rule Making, 18 FCC Rcd 13620, ¶ 122 (2003).

<sup>4</sup> The most recent RTDNA/Hofstra survey is attached hereto as Exhibit A (the "2010 Survey"). Past surveys are publicly available at RTDNA's website, <http://www.rtdna.org/pages/research/staffing-and-profitability.php>.

**A. Local Broadcasters Compete with National Media Using Local News and Information Programming.**

Without a doubt, the current economic recession has hit broadcast journalists hard. In 2009, television newsrooms cut 400 jobs (or 1.5 percent of the workforce), which was an improvement from the prior year's elimination of 1,200 jobs (or 4.3 percent of the workforce). Yet, during this same two year period, the average amount of local news broadcast by television stations on an average weekday increased by from 4.1 hours to 5.0 hours—a jump of 18 percent. Although gains among radio stations have been more modest over the past year,<sup>5</sup> between 2004 and 2008, radio stations, on average, doubled the number of minutes each weekday devoted to local news.<sup>6</sup> The reason for this trend is simple: in an increasingly competitive media landscape, “localism is the market advantage that broadcast stations have over other programming competitors.”<sup>7</sup> Indeed, the Commission recognized this truth in 1984, when it deregulated television content: “*future* market forces, resulting from increased competition, will *continue* to require licensees to be aware of the needs of their communities.”<sup>8</sup>

What was true in 1984 remains true today. The mass media, however, have changed: the major television networks stream their programs online—sometimes within twenty-four hours of broadcast—and national and international news programming is dominated by a handful of national newspapers, cable news networks and their respective online outlets. As a result, while

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<sup>5</sup> 2010 Survey.

<sup>6</sup> 2004 RTNDA/Ball State University Survey, available at <http://www.rtdna.org/media/pdfs/communicator/2004/sep/092004-Research.pdf> (“2004 Survey”); 2008 RTNDA/Hofstra University Survey, available at <http://www.rtdna.org/media/pdfs/research/Bob%20Paper%20-%20Profitability%20Survey%202.pdf> (“2008 Survey”).

<sup>7</sup> Robert M. McDowell, Commissioner, FCC, Keynote Address at the 2008 Quello Communications Law and Policy Symposium (April 23, 2008), available at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/DOC-281772A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-281772A1.pdf).

<sup>8</sup> *The Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations*, 94 FCC 2d 1076, ¶ 49 (1984) (emphasis added); see also, e.g., *Deregulation of Radio*, 84 FCC 2d 968, ¶ 26 (1981) (noting that “stations will continue to present [local] programming as a response to market forces” and that “marketplace forces will assure the continued provision of news programs in amounts to be determined by the discretion of the individual broadcaster guided by the tastes, needs, and interests of its [audience]”).

television audiences may have several options for viewing the latest episode of ABC's *Lost*, these same viewers are increasingly reliant on local broadcast stations for information about their communities, especially in communities with failed or failing daily newspapers. A study released earlier this year by the Pew Research Center confirms the persistent, strong demand for broadcasters' news and information programming: on a typical day, 78% of Americans turn to a local television station and more than half tune to a local radio station to receive news and information programming.<sup>9</sup>

Broadcasters, in turn, continue to structure their businesses to respond to the strong demands—particularly among television audiences—for local news and information. For example, over the past five years, television broadcast stations have increased their reliance on local news programming as a source of revenue. In 2005, a television station's newsroom generated 42.8% of the station's revenue.<sup>10</sup> Today, the average television newsroom generates 44.7% of station revenue.<sup>11</sup> Radio stations are making similar changes to respond to their audiences. In 2009, more than a quarter of the radio stations surveyed in the RTDNA/Hofstra study devoted additional time to broadcasting local news and information, and 17% indicate that they plan to do the same in 2010.<sup>12</sup>

**B. Broadcasters Leverage Online and Social Media to Promote and Enhance Broadcast Newscasts.**

During the Commission's March 4, 2010 workshop on the future of media, Paul Starr of the Woodrow Wilson School, Princeton University, addressed the history of regulating the news

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<sup>9</sup> Pew Research Center, *et al.*, *Understanding the Participatory News Consumer 3*, available at [http://www.pewinternet.org/~media/Files/Reports/2010/PIP\\_Understanding\\_the\\_Participatory\\_News\\_Consumer.pdf](http://www.pewinternet.org/~media/Files/Reports/2010/PIP_Understanding_the_Participatory_News_Consumer.pdf) (last visited May 4, 2010).

<sup>10</sup> Bob Papper, *News, Staffing, and Profitability Survey*, Communicator, Oct. 2005, at 34, available at <http://www.rtdna.org/media/pdfs/communicator/2005/oct/102005-34-38.pdf> ("2005 Survey").

<sup>11</sup> *2010 Survey*.

<sup>12</sup> Bob Papper, *TV and Radio News Staffing and Profitability Survey 2009*, available at <http://www.rtdna.org/media/pdfs/research/TV%20and%20Radio%20Staffing%20and%20Profitability.pdf> ("2009

media and noted that audiences have traditionally obtained informed about local news and events because of “incidental” encounters with the news.<sup>13</sup> For example, newspaper readers might scan the front page headlines on their way to read the comics or the sport sections. Similarly, television viewers are exposed to promotional spots for a station’s newscast that promise “more, at eleven.” According to Starr, in today’s “more fragmented media environment,” people are less likely to “bump into the news.”<sup>14</sup> Starr goes on to cite a 2008 survey by the Pew Research Center that indicates that more than a third of 18 to 24 year-olds “get no news on an average day.”<sup>15</sup>

RTDNA’s members are keenly aware that digital media evolve rapidly and that what was true in 2008 may no longer be the case today.<sup>16</sup> As such, RTDNA quibbles with Starr’s reliance on the 2008 Pew survey. As demonstrated in the 2010 Survey, over the past year, broadcasters’ use of social media—primarily Twitter and Facebook—skyrocketed. In the 2009 Survey, 36 percent of television stations indicated that “they were doing nothing with social media.”<sup>17</sup> In 2010, that number dropped to eight percent.<sup>18</sup>

But what is impressive about television broadcasters’ use of social media is that they are not simply reformatting newscasts for online viewing. Instead, television stations are using social media to involve their audiences in news processes in order to lithely respond to the particular demands of their audiences, especially those who would ordinarily “get no news on an

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*Survey*”); *2010 Survey*.

<sup>13</sup> Paul Starr, *Statement to the FCC Workshop on the Future of Media and Information Needs of Communities 4* (March 4, 2010).

<sup>14</sup> *Id.*

<sup>15</sup> *Id.* (citing <http://people-press.org/report/444/news-media>).

<sup>16</sup> This recognition is the reason why, after more than 60 years as the “Radio-Television News Directors Association,” the organization changed its name to the “Radio Television Digital News Association” in 2009.

<sup>17</sup> *2010 Survey*.

<sup>18</sup> *Id.*

average day.”<sup>19</sup> For example, in 2010, television broadcasters used social media to solicit audience feedback and comments, to develop story ideas, and to request other user generated content (such as photos and videos) that could be used in reporting local stories.<sup>20</sup> Notably, a television station’s use of social media is largely independent of market size, network affiliation or geography.<sup>21</sup>

Given television broadcasters’ eager and rapid adoption of social media, Professor Starr’s observation that Americans—especially young Americans—are less likely to “bump into the news” in today’s diverse media landscape falls flat. While Twitter was initially a service adopted by the 35+ demographic, over the past year, use of Twitter by the 17 and under and 18-24 year-old sets have increased dramatically.<sup>22</sup> As broadcasters continue to develop their use of social media, those who do not watch traditional newscasts or encounter promotional spots between prime-time programs, may be prompted by an intriguing tweet or posting on Facebook to watch news footage online or to “tune in for more, at eleven.”<sup>23</sup> In this manner, broadcasters have expanded the extent of their service by reaching out to audiences that have abandoned traditional media formats while continuing to provide free, over-the-air broadcast service.

**C. Technological Advances Enable Broadcast Journalists to Do More, at a Higher Quality, with Fewer Resources.**

As noted above, despite cuts to newsroom budgets and staff, broadcasters have increased the amount of news and information programming they air. Skeptics may claim that this result is only achieved through a reduction in quality, but such criticisms are based on a flawed

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<sup>19</sup> See *supra*, note 15.

<sup>20</sup> 2010 Survey.

<sup>21</sup> *Id.*

<sup>22</sup> See, e.g., Business Insider, Chart of the Day, <http://www.businessinsider.com/chart-of-the-day-the-youngsters-flocked-to-twitter-in-2009-2010-2> (last visited May 4, 2010).

<sup>23</sup> For example, as of May 4, 2010, one D.C. television station, WUSA(TV), has 10,564 Twitter “followers” and 6,089 Facebook “fans,” many of whom will incidentally encounter local news and information through the station’s regular tweets and posts.

assumption that broadcast journalists have not evolved and maintain a *status quo* in the methods of gathering, producing, and airing news. This is not the case, and RTDNA submits that advances in digital technologies have created efficiencies that allow electronic journalists to do more with less—without sacrificing quality.

While the number of people employed by broadcast news operations generally increased over the past 35 years to accommodate additional news programming or to create new program offerings, recent market disruptions have compelled broadcasters to use resources as efficiently as possible. Faced with an increased demand for news programming and a static or declining newsroom budget, broadcasters turn to technology to increase editorial capacity. Cameras and editing suites are smaller, lighter, and easier to use. As a result, some broadcasters are finding that a single electronic journalist can take the place of a three-person team. This new breed of multimedia journalist has been given various titles—from a “one-man-band” to an “all platform journalist”—but regardless of the label, broadcasters have found that a single journalist can provide more nimble coverage of certain types of news events. According to one news executive, the “one-man-band” approach, coupled with new digital tools, has had a democratizing effect in the newsroom. Now, everyone in the newsroom can have a beat and stations are putting more “boots on the ground” to provide broader coverage, generally, or to target key areas with greater intensity.

Broadcasters are also using digital and online technology to create journalistic content that is intended to augment, not to supplant, stations’ regular newscasts, but which does not easily translate to a broadcast format. For example:

- Many stations are creating hyper-local sites for neighborhoods. KOMO-TV in Seattle has built 50 hyper-local web sites so far.<sup>24</sup>

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<sup>24</sup> See KOMO News, <http://komonews.com/communities> (last visited May 5, 2010).

- Stations are extending their investigative reporting by creating searchable databases on their websites. WCMH-TV in Columbus, Ohio, created databases on Columbus burglaries, Ohio stimulus requests, state liens, and 18 other topics.<sup>25</sup> WPTV-TV in Palm Beach has a searchable “Restaurant Report,”<sup>26</sup> that compiles government inspection reports.
- Stations—even small-market stations like WJBF(TV) in Augusta, GA—are using Google Maps to show where news is happening.<sup>27</sup>
- Stations are also aggregating live source feeds. WFLD(TV) in Chicago, IL, has created a website, LiveNewsCameras.com, that aggregates and streams multiple video feeds of live coverage to provide multiple angles during breaking news events and dozens of angles and viewing options during schedule news events.
- Stations are investing technology that enables audience members to participate in the collection and dissemination of news. Local stations in Washington, DC, collected viewer video and other information during the snowstorms and featured this material on their web site and on air.<sup>28</sup>
- Radio stations are extending their online reach by incorporating video and text as well as audio into their web sites. WAKR(AM) in Akron, Ohio, provides news, traffic and weather in a 24/7 audio stream—the online equivalent of an all-news radio station—and also provides a daily video podcast to Akron’s 250,000 residents.<sup>29</sup> Similarly, WTOP-FM, in Washington, D.C., created an internet-only radio station focusing on news for federal government workers.<sup>30</sup> The station proved so popular it is now broadcast on WTOP(AM).

Because of these innovations and efficiencies, broadcasters remain a vibrant source of important investigative journalism. For example in 2010, station KHOU-TV, in Houston, Texas received a regional Edward R. Murrow Award for its two-year investigation of the Texas National Guard. The station’s investigation, which began with an inquiry into allegations of harassment of and discrimination against female officers, quickly expanded and uncovered instances of corrupt practices and misappropriation of funds by the Texas National Guard’s commanding officers. KHOU-TV’s reporting spurred formal investigations by state and federal

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<sup>25</sup> See NBC 4i, <http://www.nbc4i.com> (last visited May 5, 2010).

<sup>26</sup> Florida Restaurant Inspections, <http://www.wptv.com/content/restaurants/inspections/default.aspx> (last visited May 5, 2010).

<sup>27</sup> WJBF, <http://www2.wjbf.com> (last visited May 5, 2010).

<sup>28</sup> Live Snow Video, <http://www.myfoxdc.com/subindex/video/viewercams> (last visited May 5, 2010).

<sup>29</sup> AkronNewsNow.com, <http://www.akronnewsnow.com/news/wakrnewsnow.asp> (last visited May 5, 2010).

lawmakers and ultimately resulted in Governor Rick Perry relieving the Texas National Guard's top officers of their command and installing a new leadership team, which included, for the first time in Texas history, a female commander of the Texas Army Guard.<sup>31</sup>

**D. Broadcasters Continue to Play a Critical Role During Times of Emergency.**

Yet another way of assessing the state of the news industry is through our collective experience with electronic journalism. Local broadcasters cover breaking news events ranging from severe storms to government abuses. They serve their communities with weather and sports, coverage of local elections and politics, and public affairs programming. But, given their affinity for local communities and their one-to-many distribution model, broadcasters' most compelling and unique role is the dissemination of critical information quickly and efficiently during times of emergency.

There are countless examples across the country, whether on 9-11 or during Hurricane Katrina, or during emergencies that never made national headlines but affected local citizens acutely, where broadcasters were the primary source of critical information about health and safety—either because the government could not get the information out itself, or because cell phones or other communications services were impaired. During the back-to-back snowstorms that buried the DC region this winter, electronic journalists provided a vital link between local governments, first responders, and the public. For example, upon realizing that dialysis patients might be marooned, area hospitals turned to broadcast journalists to spread the word that they needed competent drivers of four-wheel drive vehicles to transport patients for this critical treatment. As a result, countless lives were saved. At the request of local fire departments, local broadcasters urged snowbound residents to remove snow from around fire hydrants so that fire

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<sup>30</sup> Federal News Radio 1500 AM, <http://www.federalnewsradio.com> (last visited May 5, 2010).

fighters would not have to delay responding to a fire while they uncovered hydrants. Journalists also risked personal injury and ventured out into the severe weather provide viewers with images and reports of the storm. With the storms cutting broadband cables, area residents could still rely on over-the-air broadcasters to convey critical information about the snow emergency.

During the blizzards, radio and television stations often had to preempt local or national advertisements so that they could quickly disseminate critical information. While most area residents were homebound, broadcasters' employees worked around the clock to provide continuous coverage of the unusual event. Broadcasters had to house, feed, and pay employees' overtime for a one-week period. And they did this, not because the government requires them to do so, but because they are committed to serving their local communities.

RTDNA recognizes that some commenters will doubtlessly point to specific instances where a single broadcaster may not have served the public interest to their liking. RTDNA urges the Commission, however, to be leery of justifying additional regulations based on discrete examples of perceived failures. Most broadcasters are good stewards of their licenses and go to great lengths to be reliable, dynamic sources of local news and information.

## **II. FUNDAMENTAL FIRST AMENDMENT PRINCIPLES CONSTRAIN THE COMMISSION'S ABILITY TO IMPOSE CONTENT-BASED REGULATIONS.**

A free and independent press—described as “one of the greatest bulwarks of liberty”<sup>32</sup>—is a pillar of our functioning democracy, and its foundation is the First Amendment's guaranty of the right to communicate and to receive information free from governmental interference. In those limited instances when government regulation of speech can be justified, the government bears the burden of proving that any speech restraints are both necessary and well tailored to its

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<sup>31</sup> See RTDNA Contests, [http://contests.rtdna.org/entries/public\\_view/1593](http://contests.rtdna.org/entries/public_view/1593) (last visited May 7, 2010).

<sup>32</sup> *McConnell v. FCC*, 540 U.S. 93, 286 (2003) (Thomas, J., concurring) (quoting the declaration of Rhode Island

purpose. All government agencies have a responsibility to insure that their actions comply with the First Amendment; thus, RTDNA urges the Commission to tread lightly if it establishes policies or proposes new regulations based on this proceeding.

Because of the danger of chilling free speech, governmental regulation of content has always walked a fine constitutional line. As the United States Supreme Court aptly observed, “balancing the various First Amendment interests involved in the broadcast media and determining what best serves the public’s right to be informed is a task of great delicacy and difficulty.”<sup>33</sup> If the First Amendment is to retain its strength as a bulwark against government control of the press, its underpinning—ensuring free and open debate about important local, regional, and national issues—cannot be used to justify government regulation of broadcast content.

Established precedent permits several categorical statements about the Commission’s role in regulating broadcast content. The Commission does not attempt to direct licensees in the selection or presentation of specific material.<sup>34</sup> The choice of whether and to what extent to provide local news programming is committed to the broadcaster’s good faith discretion.<sup>35</sup> A broadcaster is under no obligation to cover each and every newsworthy event which occurs within a station’s service area,<sup>36</sup> and the FCC will not question a broadcaster’s judgment merely because some party expresses the opinion that a particular event should have been covered or reported differently. To do so would contravene the First Amendment.<sup>37</sup>

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upon the ratification of the Constitution. 1 J. Elliot, *Debates of the Federal Constitution* 335 (1876).

<sup>33</sup> *Columbia Broadcasting Systems, Inc. v. Democratic National Committee*, 412 U.S. 94, 102 (1973).

<sup>34</sup> *Stockholders of CBS, Inc.* 11 FCC Red 3733, 3746 (1995).

<sup>35</sup> *American Broadcasting Companies, Inc.* 83 FCC 2d 302, 305 (1980).

<sup>36</sup> *KSD-TV, Inc.*, 61 FCC 2d 504, 510 (1976).

<sup>37</sup> *National Citizen’s Committee for Broadcasting*, 32 FCC 2d 824 (1971); *see also The Selling of the Pentagon*, 30 FCC 2d 150 (1971); *Columbia Broadcasting System (Hunger in America)*, 20 FCC 2d 143 (1969); *Network Coverage of the Democratic National Convention*, 16 FCC 2d 650 (1969).

Inherent in each of these precepts is a notion that determining the manner and scope of news coverage is the broadcaster's prime journalistic function and is therefore a matter far removed from valid FCC supervision. Otherwise, the Commission "would assume a journalistic role totally inappropriate under the First Amendment, for which it lacks any expertise or authority."<sup>38</sup> Once a journalist has to stop and consider what a government agency will think of something he or she wants to broadcast, the press's freedom has been lost.

Because of the *Public Notice*'s focus on measuring the availability of local news and information programming as well as quantifying operational trends in broadcasters' newsrooms, RTDNA's members are particularly concerned by the implicit suggestion that it might be appropriate for the Commission to take steps to promote certain types of favored speech—most notably, news and information programming. The First Amendment has always been hostile to such efforts, and RTDNA firmly believes that *any* rule that would dictate to broadcast licensees whether and how to provide local news and information programming—through quotas, mandatory air time, or raised eyebrow regulation—represents an affront to journalistic freedom.

RTDNA recognizes that the broadcast media are protected by a different First Amendment standard than the rest of the population, including the print and online media. As the Supreme Court has repeatedly observed, such scrutiny allows restrictions on broadcaster speech to be upheld "only when . . . narrowly tailored to further a substantial government interest."<sup>39</sup> RTDNA submits, however, that any action by the Commission that would impinge on editorial discretion—for example, by requiring broadcasters to air a minimum type, amount, or quality of "news" or other public affairs programming—would not withstand even this lower level of constitutional scrutiny. Indeed, in its most recent and salient pronouncement on

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<sup>38</sup> *Complaint of American Legal Foundation against CBS, Inc.*, 55 RR 2d 1169 (MMB 1985), *rev. denied* FCC 85-556 (rel. Oct. 18, 1985).

broadcast regulation, the Court stated “the FCC’s oversight responsibilities do not grant it the power to ordain any particular type of programming that must be offered by broadcast stations.”<sup>40</sup>

In the present media environment, the Commission would face a particularly high burden to justify a modification of its deregulation of broadcast content over twenty-five years ago. As the Commission noted in 1983, policies cautioning broadcasters to engage or not to engage in certain programming practices or establishing rigid guidelines in relation to such programming “raise fundamental questions concerning the constitutional rights and editorial freedom of broadcast licenses,” and therefore cannot be retained in the absence of a “clear and compelling showing” that the public interest demands their retention.<sup>41</sup> As the 2010 Survey demonstrates, and as broadcasters in this proceeding will doubtlessly prove, the television and radio broadcast industry has not starved the public of local news and information programming. To the contrary, over the past several years, broadcasters have consistently devoted additional airtime to local news and information programming. Accordingly, in this context, it is impossible for the Commission to make a “clear and compelling showing” of a substantial governmental interest that would be furthered by imposing additional content regulation on broadcasters. Doing so would instead require the Commission to enter “‘an impenetrable thicket’ of reviewing editing processes and adjudging editorial judgment . . . a function inconsistent with the First Amendment and with the national commitment to the principle that debate on public issues should be ‘uninhibited, robust, [and] wide open.’”<sup>42</sup>

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<sup>39</sup> *FCC v. League of Women Voters of California*, 468 U.S. 364, 380 (1984).

<sup>40</sup> *Turner Broadcasting Sys. v. FCC*, 512 U.S. 622, 650 (1994).

<sup>41</sup> *Elimination of Unnecessary Regulations*, 54 RR 2d 1043, ¶¶ 9-10 (1983).

<sup>42</sup> *In re Application of WGPR, Inc. and CBS, Inc.* 10 FCC Rcd 8140, 8147 (1995) (quoting *New York Times Co. v. Sullivan*, 376 U.S. 254, 270 (1964)).

An attempt to inject the federal government and its regulatory system into broadcasters' newsrooms would not be a well-justified, narrowly tailored exercise of power but a mischievous and misguided undertaking. There should not be governmental policies to govern how any form of local news is communicated through the electronic media. Such an approach would be particularly offensive to the First Amendment's guarantee of a free press; the First Amendment does not countenance a governmental assessment of whether broadcasters are airing sufficient quantities of "news." Even when there exists a government interest and the government has chosen the most narrowly tailored means to further that interest, government is forbidden from censoring content or otherwise dictating categories of programming broadcasters must or must not show. A free and independent press is too important for the Commission to make it a burnt offering to the vocal few who disagree with what broadcasters chooses to air in their nightly newscasts.

While this proceeding itself raises no particular proposals, certainly the discussion that has surrounded the Commission's inquiries (as well as those of the Federal Trade Commission) about the "future of media" and what is or is not working in the area of news and information has included suggestions as to how the government can resolve what has been characterized as a "crisis" or "contraction" in journalism. Again, integrating the government and the press is intolerable under the First Amendment. The notion of government subsidies, even when cast as content neutral, raises the specter that reporting on government misdeeds would be dampened, stories unduly influenced or killed, and suggests that the government has an appropriate role in deciding which "journalists" would be entitled to such funding. Further, such action would undoubtedly further erode public trust. New taxes on broadcast spectrum, onerous recordkeeping and reporting requirements, and meaningless obligations imposed in the name of

“localism” would serve only to divert resources from local beat reporters, investigative journalism, enterprise reporting, national and foreign bureaus, new and better technology—all of which the Commission ostensibly seeks to foster and protect. The government can best advance quality journalism through openness and transparency, and by forbearing from regulation that will diminish available resources or otherwise stifle independent editorial decision making and the free flow of information.

### **III. CONCLUSION**

RTDNA urges the Commission to refrain from imposing new regulations on broadcasters under the auspices of promoting the dissemination of news and information. The government should stand aside as journalism organizations experiment and innovate with new technologies, business models, and multimedia platforms. As demonstrated herein, the sky is not falling; broadcast journalists are adapting and offering an abundance of local news and information how and when consumers want it. The Commission should not accede to calls from those who would have the government tell the public what is best for them or who would integrate the government and the press. That would deal a far greater blow to our democracy than any perceived contraction in journalism.

Respectfully submitted,

RADIO TELEVISION DIGITAL NEWS  
ASSOCIATION

By:     /s/ Kathleen A. Kirby    

Kathleen A. Kirby  
Matthew L. Gibson  
WILEY REIN LLP  
1776 K Street NW  
Washington, DC 20006  
TEL: 202.719.7000  
FAX: 202.719.7049

Its counsel

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**EXHIBIT A**  
**2010 RTDNA/Hofstra Survey**

How the business of TV news is changing:

**The survey numbers show how much the business is changing**

by Bob Papper

The latest RTDNA/Hofstra University Survey shows how much the TV business model is changing. There's much less evidence of fundamental change in radio, but the evolution of strategies, priorities and news outlets in TV make clear that the TV business of today is a far cry from the television industry of just a few years ago.

**TV news departments are providing content over more outlets than ever before.**

Percentage of TV News Departments Providing Content to Other Media – 2010

	Another local TV station	TV in another market	Cable TV channel	Local radio	Website not your own	Mobile device	Other
All TV	32.7%	13.8%	10.7%	52.0%	13.8%	44.9%	13.8%
Big four affiliates	33.5	12.5	9.7	52.8	12.5	46.0	14.8
Other commercial	23.5	23.5	23.5	35.3	29.4	41.2	5.9
Market size:							
1-25	38.9	13.9	16.7	44.4	22.2	55.6	19.4
26-50	22.7	18.2	0	63.6	9.1	50.0	9.1
51-100	26.2	13.1	11.5	49.2	14.8	50.8	21.3
101-150	45.2	11.9	4.8	59.5	7.1	31.0	4.8
151+	28.6	14.3	17.1	48.6	14.3	37.1	8.6

This table is where you see that TV stations are not simply in the TV business – at least not just at their own stations. Nearly a third (32.7%) of TV news directors say that they run local news on another local or nearby station. That's about the same as last year, and the percentage of stations running news on a cable channel is down slightly. But all other categories are up.

“Mobile devices” is a new entry in this year's survey. Last year, it showed up under "other," but even if all of last year's "other" was mobile -- and it wasn't -- this year's figure would still represent a doubling in the last year. This year, "other" choices were spread over a wide range of activities, but the two most common were running material on one of the station's other digital channels and some sort of joint effort with a newspaper.

**Stations are heavily involved in cooperative ventures with others.** The table above deals with stations supplying news to other media. The next table deals with cooperative ventures among media outlets.

Aside from the local or nearby TV station for which you produce news, do you have a cooperative news gathering or coverage agreement with the following?

	Another TV station	Local newspaper	Local radio station	Other	No
All TV Market	23.6%	23.6%	27.7%	4.0%	38.6%
1 - 25	41.3	22.2	22.2	9.5	30.2
26 - 50	22.7	27.3	22.7	2.3	38.6
51 - 100	18.5	33.7	33.7	6.5	30.4
101 - 150	13.1	19.0	29.8	0	50.0
151+	28.6	14.3	25.4	1.6	42.9

Overall, more than 60 percent of stations say they're involved in some sort of cooperative news gathering or coverage agreement with another medium. Interestingly, stations in smaller markets are a little less likely to be involved in cooperative agreements than stations in larger markets. Stations with larger staffs, 31 and bigger, are also more likely to be involved in cooperative agreements than smaller operations.

ABC affiliates are a little less likely to be involved in these agreements than other affiliates. Otherwise, there were no meaningful differences by subset.

For those stations that are involved with cooperative agreements, we asked what they were sharing.

	Information	Helicopter	Pool video	Other
All TV	32.3%	4.0%	15.0%	8.4%

Market				
1 - 25	30.2	19.0	33.3	7.9
26 - 50	31.8	2.3	15.9	9.1
51 - 100	44.6	1.1	13.0	10.9
101 - 150	22.6	0	2.4	7.1
151+	30.2	0	15.9	6.3

Generally, the larger the staff, the more likely that the station is sharing information, a helicopter, pool video and other. NBC and Fox affiliates are a little more likely than others to be sharing information; Fox and CBS stations were more involved with pool video; CBS stations were more involved in the other category. Stations in the Northeast were a little less likely to be involved in sharing information but more likely to be involved in sharing a helicopter and pool video.

The "other" category was all over the place. Various forms of shared content showed up most often with shared staff members coming in second.

For stations not involved in cooperative arrangements, we asked whether they were planning or discussing one. More than a quarter (28.6%) said yes. Most were in the three middle (26 – 101) market groups. This group was much less likely to include ABC affiliates and a little more likely to be in the Northeast or West.

**More and more stations are running more and more stations – digital ones.** And news departments are more and more likely to be involved in what airs on those other outlets.

Stations running material on another digital channel that news director oversees

	All news channel	Weather channel	Other	No
All TV	4.1%	22.2%	22.2%	46.6%
Market:				
1 – 25	6.1	14.3	14.3	57.1
26 - 50	3.2	32.3	19.4	32.3
51 - 100	5.3	25.0	22.4	43.4
101 - 150	4.9	24.6	13.1	55.7

151+	0	16.7	41.7	39.6
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So what's "other"? Seventeen news directors noted another TV station that they're running on a second (or third) digital channel. A dozen noted news programming -- just not all news. Seven noted weather radar. Four said informational programming, and four noted sports. Three said traffic; two said programming in another language; and one noted movies.

And plenty of news directors not already involved with another digital channel (or two) expect to be involved with it (or them) in the next year.

#### Plans for 2010 on another digital channel that news director oversees

	All news channel	Weather channel	Other	No
All TV	4.9%	14.7%	14.7%	54.5%
Market:				
1 - 25	8.2	10.2	8.2	59.2
26 - 50	9.7	12.9	12.9	38.7
51 - 100	5.3	22.4	22.4	51.3
101 - 150	1.6	9.8	8.2	60.7
151+	2.1	14.6	16.7	58.3

Beyond news and weather, what are the plans? Seven news directors noted another station. Six said more news -- but not all news. Six also said they weren't sure. Four wouldn't say; two each said information or miscellaneous programming; one said foreign language programming.

#### **Two-thirds of TV stations say they have a 3-screen approach to news.**

#### Stations and a 3-screen -- on air, online, mobile -- approach to news

	Yes	No
All TV	68.8%	31.2%
Market:		
1 - 25	76.2	23.8
26 - 50	80.0	20.0
51 - 100	74.6	25.4

101 - 150	61.7	38.3
151+	56.6	43.5

Generally, the larger the market, the more likely that the station has a 3-screen approach to news. NBC affiliates were more likely than other affiliates to have a 3-screen approach, and ABC affiliates were a little less likely than others to have one. Stations in the West were less likely than the rest of the country to have a 3-screen approach.

Almost all stations ranked the order of importance as: on air, followed by online, followed by mobile. However, NBC affiliates were a little more likely to place more importance online, and Fox affiliates were a little more likely to emphasize mobile, but both of those variances were small.

## TV and Radio and Social Media

**Of course, the number of social networking initiatives soared since last year.**

What is your TV station doing with social networking? 2010

	Covering the topic in newscasts	Incorporating it into storytelling	Integrating it on the website	Nothing
All TV	66.9%	58.3%	76.3%	8.6%
Market size:				
1-25	71.4	65.3	67.3	10.2
26-50	74.2	64.5	80.6	3.2
51-100	75.0	65.8	85.5	5.3
101-150	50.8	55.7	68.9	13.1
151+	66.7	39.6	77.1	10.4
Staff size:				
51+	81.7	74.6	87.3	1.4
31 – 50	67.7	69.4	82.3	8.1
21 – 30	66.0	51.1	74.5	10.6
11 – 20	53.7	34.1	56.1	17.1
1 – 10	30.8	23.1	53.8	38.5

Other than, perhaps, mobile devices, nowhere in the survey do we see more difference from last year than in what stations are doing in social media. A year ago, almost 36 percent said they were doing nothing with social media. This year, that number is below 9 percent. Everything went up and went up substantially. Just about double in most cases.

Neither geography nor network affiliation made any meaningful difference.

Stations offered 157 examples of what they were doing with social media. Most talked about interacting with viewers and using Twitter (124 noted), Facebook (116 noted) and MySpace (8 noted) to promote newscasts or station activity. Several dozen also noted using Twitter, Facebook and the station website to help develop tips, story leads and contacts. Most of the stations said that most reporters and many of the anchors tweeted, and quite a few stations said that not only did they have a Facebook page, but so did individual newscasts. More than a dozen news directors noted efforts to get viewer feedback and comments, and several also noted requests for viewer pictures. Seven news directors talked about staff members who blog, and three noted live chats for viewer feedback.

Percentages add up to more than 100 percent because news directors could check all that apply.

Does the station or newsroom have a Facebook page?

	Station only	Newsroom only	Both	No
All TV	19.9%	39.1%	27.1%	13.9%
Market				
1 - 25	8.2	36.7	34.7	20.4
26 - 50	12.9	35.5	35.5	16.1
51 - 100	26.3	43.3	25.0	5.3
101 - 150	24.6	37.7	21.3	16.4
151+	20.8	39.6	22.9	16.7
Staff size				
51+	46.2	23.1	15.4	15.4
31 - 50	31.7	29.3	9.8	29.3
21 - 30	12.8	46.8	19.1	21.3
11 - 20	17.7	41.9	35.5	4.8
1 - 10	16.9	39.4	38.0	5.6

Note that having one or more Facebook pages is not a function of market size or staff size, although market and staff sizes do appear related to the approach the station takes to Facebook. Bigger markets and smaller staff sizes appear more likely just to have station Facebook pages. Network affiliation made no difference, other than a lower rate of Facebook involvement for non-network affiliates. Geography made relatively little difference, although stations in the Northeast were a little less likely to be involved in Facebook than others.

Is the newsroom actively involved with Twitter?

	Constantly	Daily	Periodically	No
All TV	36.1%	35.3%	16.1%	12.5%
Market				
1 - 25	32.6	34.8	17.4	15.2
26 - 50	32.1	42.9	17.9	7.1
51 - 100	50.7	38.4	11.0	0
101 - 150	30.0	30.0	20.0	20.0
151+	27.7	34.0	17.0	21.3
Staff size				
51+	46.4	39.1	14.5	0
31 - 50	41.0	37.7	16.4	4.9
21 - 30	35.6	40.0	11.1	13.3
11 - 20	25.6	25.6	23.1	25.6

1 - 10	0	15.4	7.7	76.9
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Involvement with Twitter is less a function of market size -- at least directly -- than staff size. The bigger the station, the more likely that the newsroom will be involved with Twitter ... and the more likely that it will be more involved with Twitter.

### Radio and Social Networking

Clearly, radio news is lagging way behind TV in social networking.

What is your radio station doing with social networking? 2010

	Covering the topic in newscasts	Incorporating it into storytelling	Integrating it on the website	Nothing
All Radio	15.8%	9.9%	26.6%	61.1%
Market size:				
Major	25.8	19.4	32.3	61.3
Large	10.3	3.5	27.6	69.0
Medium	13.7	11.0	27.4	57.5
Small	15.9	7.3	21.7	62.3

The results on social networking depend a lot less on market size and a lot more on how many news people the station has. The big jump in social networking came with stations with three or more news people. Group-owned stations were noticeably more likely to be involved in social networking than independent stations.

Radio station news directors offered 45 examples of what they're doing. More than half noted both Facebook and Twitter. Just a few noted blogs and MySpace.

Does the station or newsroom have a Facebook page?

	Station only	Newsroom only	Both	No
All Radio	58.1%	0.9%	4.3%	36.8%
Market				
Major	68.4	0	5.3	26.3
Large	50.0	0	16.7	33.3
Medium	75.0	0	0	25.0
Small	43.2	2.3	2.3	52.3

There were no consistent differences based on staffing, number of stations or ownership.

Is the newsroom actively involved with Twitter?

	Constantly	Daily	Periodically	No
All Radio	7.0%	7.0%	13.4%	72.5%
Market				
Major	26.3	0	10.5	63.2
Large	5.3	5.3	10.5	78.9
Medium	4.3	15.2	8.7	71.7
Small	3.5	3.5	17.5	75.4

Overall, there was far less use of Twitter in radio than TV. Stations with large staffs were more likely to use Twitter, as were group-owned stations, but the vast majority in all cases used Twitter sparingly if at all.

Only one radio station in six (16.7 percent) said it was doing anything involving convergence. Non-commercial and stations with larger staffs were more likely to say yes.

Most common examples cited: efforts on the station's web site; working with a local TV station; working with a local newspaper; then a tie between mobile applications and public radio consortiums.

## TV and Radio on the Web

### TV and radio stations are not paying less attention to the web

#### Who Has Web Sites? 2010

All TV	99.7%	All Radio	96.7%
Market Size		Market Size	
1 - 25	100.0	Major	100.0
26 - 50	100.0	Large	100.0
51 - 100	100.0	Medium	97.8
101 - 150	98.8	Small	93.5
151+	100.0		

Station web sites are nearly universal, but we found a TV station -- a Fox affiliate in the Midwest -- that said no, it didn't have one.

Radio rose slightly from a year ago, with all large and major market stations (that run local news) with a web site.

Major markets are those with 1 million or more listeners. Large markets are from 250,000 to 1 million. Medium markets are 50,000 to 250,000. Small markets are fewer than 50,000.

#### How Many Web Sites Include Local News? 2010

All TV	98.1%	All Radio	72.2%
Market Size		Market Size	
1 - 25	97.9	Major	53.3
26 - 50	100.0	Large	71.4
51 - 100	98.6	Medium	76.7
101 - 150	95.1	Small	73.8
151+	100.0		

In TV, as in the past, only the newsrooms with the smallest staffs don't include local news. Radio numbers remained largely unchanged from a year ago.

#### Elements of Local News Web Sites 2010

TV	Text	Still Pics	Audio	Strmng Audio	Live Cam	Nws Vid	Live Nwscsts	Rcrded Nwscsts	Blogs	Pdcsts	Assmble Own Nwscsts	Other
All TV:	94.9%	94.5%	65.2%	33.2%	61.3%	96.9%	35.9%	37.5%	69.9%	10.2%	2.7%	9.0%
Markets 1	93.5	84.8	69.6	43.5	69.6	97.8	39.1	28.3	71.7	6.5	2.2	6.5

- 25												
Markets 26 - 50	90.0	96.7	70.0	50.0	83.3	96.7	43.3	33.3	90.0	26.7	3.3	10.0
Markets 51 - 100	95.9	98.6	76.7	43.8	60.3	97.3	47.9	37.0	74.0	16.4	5.5	8.2
Markets 101 - 150	96.6	96.6	55.2	17.2	55.2	96.6	32.8	31.0	60.3	3.4	1.7	8.6
Markets 151+	97.9	95.8	54.2	16.7	50.0	97.9	14.6	56.3	62.5	2.1	0	12.5

Radio	Text	Still Pics	Audio	Strmng Audio	Live Cam	Nws Vid	Live Nwscsts	Rcrded Nwscsts	Blogs	Pdcsts	Other
All Radio:	87.5%	51.0%	55.8%	41.3%	2.9%	11.5%	9.6%	21.2%	20.2%	23.1%	2.9%
Major Market	92.3	76.9	61.5	46.2	0	23.1	23.1	38.5	30.8	53.8	15.4
Large Market	92.9	35.7	64.3	42.9	14.3	14.3	14.3	14.3	28.6	21.4	0
Medium Market	86.5	40.5	48.6	37.8	2.7	10.8	2.7	13.5	16.2	24.3	2.7
Small Market	84.6	56.4	59.0	43.6	0	7.7	10.3	25.6	17.9	12.8	0

We appear to see a maturing of the web sites, especially in TV. Text, still pictures and news video are now essentially universal on TV web sites. The use of audio, live cameras, recorded newscasts and blogs all went up noticeably. But a number of areas either leveled off or fell: streaming audio, podcasts and assemble your own newscasts. Recorded newscasts edged up slightly, but the numbers suggest that, more and more, stations are deciding that certain web elements aren't working that well for them -- or aren't worth the effort -- and they're either scaling them back or not bothering with them at all. Allowing the audience to assemble their own newscasts actually peaked at around 10 percent a few years ago ... and has edged down ever since. Consistent with past results, the largest stations tend to have the most complex web sites. There are no meaningful distinctions based on network affiliation or geography, although PBS affiliates have far less complex web sites than their commercial counterparts.

Most of the radio numbers are pretty close to last year's. The exceptions include audio, streaming audio and blogs -- all of which went up. Still pictures and news video both dropped slightly. Although we list the radio subset of market size, that actually has little to do with the complexity of radio websites today. The key determinant of complexity is how many people work in news. The consistent jump in website complexity comes when a station or group has at least three people in news.

### What Do Users Want From the Station Web Site?

Rank	All TV - 2010	All TV - 2009	All Radio - 2010	All Radio - 2009
1	Local weather	Local news	Local news	Local weather
2	Local news	Local weather	Local weather	Local news
3	Other information	Local sports	Local sports	International news
4	Headlines	Headlines	Other information	National news
5	Local sports	National news	Weather elsewhere	Headlines
6	National news	Bios of on air talent	National news	Sports elsewhere
7	Health	Other information	Entertainment news	Consumer news
8	Weather elsewhere	Entertainment news	Live cameras	Education
9	Consumer news	Health	Bios of on-air talent	Health
10	Entertainment news	Weather elsewhere	Headlines	Bios of on-air talent
11	Bios of on-air talent	Consumer news	International news	Entertainment news
12	Education	Traffic	Consumer news	Weather elsewhere
13	Traffic	Live cameras	Sports elsewhere	Live cameras
14	Money	Money	Education	Local sports
15	Live cameras	Education	Food	Food
16	Food	Food	Traffic	Money
17	International news	Sports elsewhere	Money	Traffic
18	Sports elsewhere	International news	Health	Other

For TV, local weather and local news led the list -- as they always do. "Other information" had never been as high as third place before. Only two other categories moved up or down more than two places: Education rose by three; bios of on-air talent fell by five.

The "other" category really does involve a wide array of choices. Among the top picks: photo galleries, school closings, video, user-generated content, contests and promotions and breaking news.

In radio, local news and local weather took the top two spots. They reversed position, as they

have before. Local sports shot up to number three from last year's surprisingly low number 14. "Other" shot up as well. The most popular "other" included events/community calendar and program schedule, followed closely by contests and promotions and some form of commerce. Others moving up substantially: weather elsewhere, entertainment news and live cameras. Moving down substantially: headlines, international news, consumer news, sports elsewhere, education and health.

#### How Many People Work on the Web? 2010

	Full-time	Part-time	Total
All TV	2.8	4.5	7.3
Markets 1-25	3.4	2.7	8.3
Markets 26-50	2.7	5.6	8.3
Markets 51-100	2.6	2.4	4.9
Markets 101-150	2.9	4.0	6.9
Markets 151+	2.7	6.6	9.3
All Radio	1.2	1.8	3.0
Major Market	1.3	2.4	3.7
Large Market	1.5	1.9	3.4
Medium Market	1.3	2.0	3.3
Small Market	1.0	1.4	2.4

We compare web staffing – from one year to the next -- in two ways. First, the survey asks news directors to tell us how many full and part timers they have now -- and how many they had the year before. Then we also compare the "now" to what last year's respondents said for "now." Usually, the results are fairly close, but that's not the case this year. This year's respondents reported, overall, that they stayed about the same in web staff in the last year. But if we compare this year's answers to the answers we received last year, then web staffing went up one full time person and one part timer. Different news directors and different stations could account for some of the difference, but all categories and groupings are up over a year ago. Since one comparison is based on memory and the other on count, I suspect that web staffing really did go up noticeably in the last year. Overall, ABC and CBS stations tended to have bigger web staffs than Fox or NBC stations.

In radio, full time web staffing actually dropped slightly, but part time staffing rose some. On balance, radio web staffing rose by about half of a part time person, but that's almost nothing.

There were few differences based on sub-groupings, but group-owned stations tended to have slightly more web staffing than independent stations.

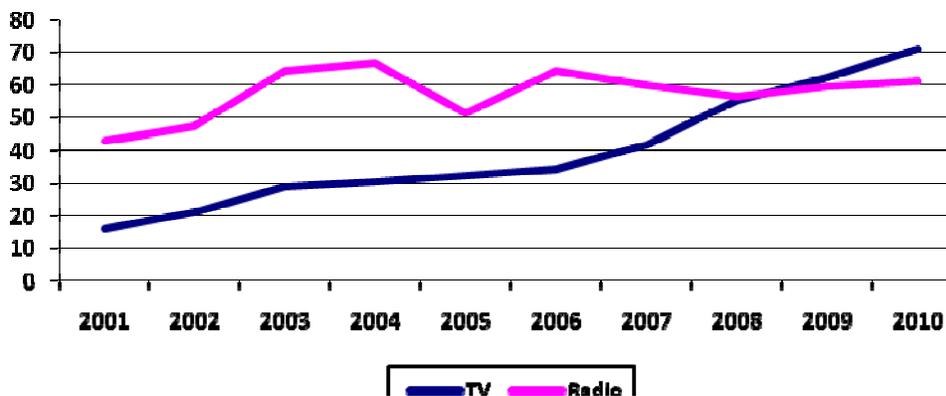
**Do Other Staffers Help on the Web? 2010**

All TV	70.9%
Markets 1-25	59.7
Markets 26-50	63.9
Markets 51-100	70.5
Markets 101-150	75.7
Markets 151+	79.2
All Radio	61.1%
Major Market	57.3
Large Market	52.8
Medium Market	53.2
Small Market	73.5

Every year, the percentage of staffers working on the web goes up, and this year's number is up more than 10 percent. In fact, every market size except the biggest rose by at least that much; markets 1-25 went up only slightly less. Staffers in the Northeast are a little less likely than elsewhere to help with the web -- as are staffers at Fox affiliates.

The radio numbers are little different from a year ago.

**Percentage of stations where staff has web responsibilities 2001-2010**



The last decade has seen a nearly straight line up in percentage of TV news staffers who have at

least some web responsibilities. Radio, in contrast, has varied over the years.

News Director Role with the Web Site 2010

	In Charge Overall	In Charge of News Content Only	No Management Role/Other
All TV	22.5%	70.0%	7.5%
Markets 1-25	27.7	59.6	12.8
Markets 26-50	16.7	76.7	6.7
Markets 51-100	20.8	73.6	5.6
Markets 101-150	19.3	73.7	7.0
Markets 151+	28.3	65.2	6.5
All Radio	26.8%	53.6%	19.6%
Major Market	44.4	33.3	22.2
Large Market	27.3	54.5	18.2
Medium Market	12.8	66.7	20.5
Small Market	35.1	45.9	18.9

On the surface, there doesn't appear to be much change in the website management role of news directors from a year ago, but there are actually two striking differences. There was a near doubling of the percentage of Fox news directors who are now in charge of the station's web site overall. At the same time, the percentage of independent news directors who oversee the station's web site plummeted. The two balanced each other out, so the overall numbers appear largely unchanged.

Overall, the radio numbers are little changed from a year ago. Radio news directors are more likely to be in charge overall at independent stations, as they were last year as well.

TV Station Website Traffic During the Past 30 Days

	Page Views (in millions)	Unique Visitors (in thousands)
All TV	4.5	284.8
Market Size		
1-25	7.2	480.8
26-50	16.5	481.2
51-100	3.1	351.0
101-150	1.9	137.2

151+	0.8	75.3
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Total TV page views are way up over a year ago, but unique visitors are up only slightly. The lower numbers for the largest markets appear to be the result of low page views and visitors to some of the smaller independents in the biggest markets.

Too few radio news directors report web traffic, so I still don't consider the numbers to be reliable enough to report.

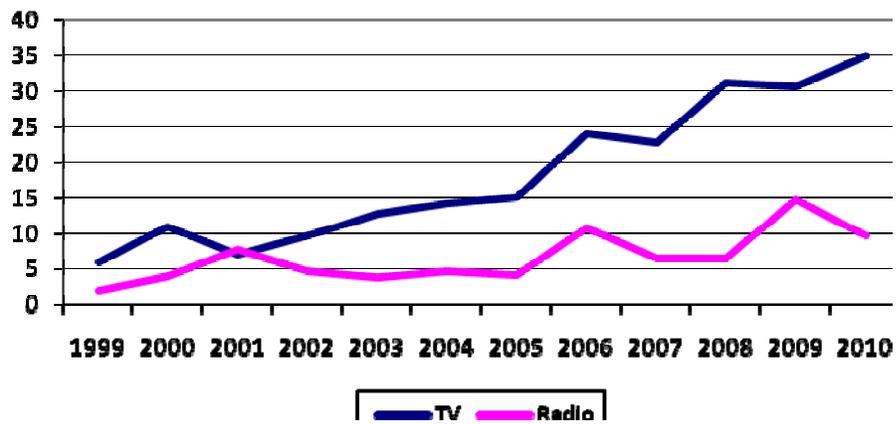
#### Making Money? 2010

	Profit	Breaking Even	Loss	Don't Know
All TV	35.0%	7.4%	14.4%	43.2%
Markets 1-25	34.1	2.4	14.6	48.8
Markets 26-50	46.4	7.1	17.9	28.6
Markets 51-100	47.1	2.9	14.3	35.7
Markets 101-150	26.8	10.7	8.9	53.6
Markets 151+	21.3	14.9	19.1	44.7
All Radio	9.7%	11.7%	15.5%	63.1%
Major Market	8.3	0	8.3	83.3
Large Market	0	25.0	25.0	50.0
Medium Market	15.4	10.3	15.4	59.0
Small Market	7.7	10.3	15.4	66.7

These may be tough economic times, but TV station web sites have continued to climb in profitability -- up 4.3 percent in the last year. A sizeable percentage of news directors still don't know the answer. The bigger the staff, the more likely that the web site makes a profit. The profitability numbers run from a low of 8.3 percent at the smallest staff sizes straight up to 50% at the biggest stations. For whatever reason, news directors at ABC affiliates are less likely to know about web profitability than other news directors.

Radio web sites didn't fare as well as TV. The percentage making a profit and breaking even both fell, although modestly. The percentage losing rose. Nearly two-thirds of radio news directors didn't know whether the web site made a profit. Web sites at group-owned stations tended to do better than independents.

Profitability of station websites over time



Note that over the past decade, TV has gone almost steadily up in profitability even as radio has generally moved up and down.

## TV and radio technology

### Percentage of stations broadcasting local news in high definition

	Percent Yes
All TV	33.1%
Market:	
1 - 25	67.4
26 - 50	65.5
51 - 100	23.3
101 - 150	20.0
151+	10.4

The critical distinction is market size, with two-thirds of the top 50 markets already running local news in HD and all other market sizes below one-quarter. There's no meaningful difference by geography, but ABC affiliates in the survey were a little less likely to broadcast local news in HD than other affiliates.

A quarter of those who said they were not already broadcasting local news in HD said they planned to do so this year. Again, the bigger the market, the more likely they were to say yes to this year. Forty percent of the news directors in top 25 markets said yes to this year if they weren't already doing it. That dropped to 15 percent for markets 151+.

In radio, we asked -- as we have in the past -- about the use of digital technologies in news gathering. Digital technology use in radio news has continued to edge up.

### Which of the following technologies are you using for news?

	Digital audio recording	Digital editing & mixing	Digital or cell phones	Field laptops for editing	MP3
All radio	62.6%	54.2%	39.4%	12.3%	50.7%
Market					
Major	58.1	48.4	32.3	19.4	41.9
Large	55.2	37.9	31.0	17.2	41.4
Medium	63.0	57.5	39.7	9.6	43.8
Small	66.7	59.4	44.9	10.1	65.2

Overall, the numbers didn't change much between commercial and non-commercial, number of staff or stations, group ownership or region.

### Percentage of news material...

	Gathered digitally	Mixed & edited digitally	Played back or aired digitally

All radio	76.6%	80.9%	82.5%
Market			
Major	89.4	88.1	93.1
Large	93.1	87.7	85.9
Medium	74.4	78.3	81.8
Small	70.2	78.1	77.6

Non-commercial stations were more likely to be more digital. So were bigger stations and stations in the Northeast. Number of stations or group ownership made no difference.

*Bob Papper is the Lawrence Stessin Distinguished Professor of Journalism and chair of the Department of Journalism, Media Studies, and Public Relations at Hofstra University and has worked extensively in radio and TV news. This research was supported by the School of Communication at Hofstra University and the Radio Television Digital News Association.*

### **About the Survey**

The RTDNA/Hofstra University Survey was conducted in the fourth quarter of 2009 among all 1,770 operating, non-satellite television stations and a random sample of 4,000 radio stations. Valid responses came from 1,355 television stations (76.6 percent) and 203 radio news directors and general managers representing 301 radio stations.

Some data sets (e.g. the number of TV stations originating local news, getting it from others and women TV news directors) is based on a complete census and is not projected from a smaller sample.

## One-Man-Bands 2010 Update

The talk about using one-man-bands has soared over the last few years – but it’s more talk than action. Actual use has risen only modestly.

Because of all the talk about the increasing use of one man bands, we added the question to the RTNDA/Hofstra University Survey in 2007 ... and followed up both last year and again this year.

Percentage of TV Newsrooms Reporting Using One-Man-Bands

	Yes, Mostly Use OMB	Yes, Use Some OMB	Yes, But Not Much Use	No, Do Not Use
All TV	31.7%	29.0	21.0	18.3
Market size:				
1-25	14.9	23.4	23.4	38.3
26-50	6.5	22.6	32.3	38.7
51-100	18.9	41.9	25.7	13.5
101-150	45.9	23.0	18.0	13.1
151+	66.7	27.1	6.3	0
Staff size:				
51+	8.5	28.2	32.4	31.0
31-50	24.6	34.4	21.3	19.7
21-30	53.2	25.5	14.9	6.4
11-20	65.0	22.5	10.0	2.5
1-10	69.2	23.1	0	7.7

In the last three years, the use of one man bands has increased but certainly not skyrocketed. Three years ago, 22.3 percent of stations said they mostly used one man bands. Today, that percentage is up to 31.7 percent. The stations reporting some use of one man bands edged up from 26.9 percent to 29.0 percent. The “not much” category slid from 22.3 percent to 21.0 percent, and the “do not use” group dropped 10 points from 28.6 percent to 18.3 percent. Most of the growth in the use of one man bands from 2007 to 2010 came in the smallest markets and at the smallest newsrooms. Only 8.5 percent of the largest newsrooms – 51 or more employees – say they mostly use one-man-bands.

### Use of One-Man-Bands in the News Department Last Year Compared to the Year Before

	Used More	Used Less	About the Same
All TV	11.9%	28.7%	59.4%
Market size:			
1-25	10.3	28.2	61.5
26-50	7.4	29.6	63.0
51-100	9.7	33.3	56.9
101-150	12.3	33.3	54.4
151+	18.8	14.6	66.7
Staff size:			
51+	10.4	25.4	64.2
31-50	20.7	31.0	48.3
21-30	10.6	31.9	57.4
11-20	11.1	30.6	58.3
1-10	0	15.4	84.6

The comparative table is interesting. Used more last year is up slightly from three years ago, but it's actually down a little from a year ago. Used less is almost double the figure from a year ago, and more than two and a half times the number from three years ago. The same won, overall, by a large margin, but 59.4 percent is down from last year's 70 percent. But all of the difference and more went into using one-man-bands less than the year before.

### Expected Use of One-Man-Bands in the News Department Next Year

	More	Less	About the Same
All TV	43.1%	0.4%	56.5%
Market size:			
1-25	39.0	0	61.0
26-50	46.4	0	53.6
51-100	51.4	0	48.6
101-150	43.1	1.7	55.2
151+	31.3	0	68.8
Staff size:			
51+	49.3	0	50.7
31-50	54.4	0	45.6
21-30	38.3	0	61.7
11-20	33.3	2.6	64.1
1-10	15.4	0	84.6

This is where we see the biggest change, with expect to use more up from 27.7 percent three

years ago to 43.1 percent this year. All of that growth came from “about the same” with “less” use remaining close to the same. But a word of caution in interpretation. These are close to the same numbers we had the year before, and the actual growth of one-man-bands was far more modest than the expectation.

**TV Staffing and News ... 2010**  
**by Bob Papper**

The RTDNA/Hofstra University Annual Survey found that 2009 meant another year of TV news doing more with less. All told, 400 people in local TV news lost their jobs – 1.5 percent of the local TV workforce. A bad year, but not nearly as bad as the year before, when 1,200 people lost jobs in TV news (4.3 percent of the workforce).

Even as staffing fell, the amount of news on the average station rose -- again -- to a record high 5 hours per weekday.

We started 2009 with 770 TV stations originating local news ... and running that news on those stations and another 205 ... for a total of 975 stations. All told, we started 2010 with 762 stations originating local news ... and running it on those stations and another 224 ... for a total of 986 stations. Only one network affiliate simply dropped local news completely in 2009.

The best news in this year's survey may be hidden in the answer to the question about planned staff changes this year. In a dramatic turnaround from a year ago, over 60 percent of TV news directors say they expect staffing levels to stay the same. That's up nearly 20 points from a year ago. The number expecting a decrease in staffing dropped 77 percent from a year ago, and the percentage expecting an increase in staff went up by 145 percent.

Hours of Local TV News per Day – 2010

	Average weekday	Weekday maximum	Average Saturday	Saturday maximum	Average Sunday	Sunday maximum
All TV news	5.0	48.0	1.7	7.0	1.6	6.0
Big four affiliates	5.2	48.0	1.7	7.0	1.7	6.0

Other commercial	3.8	11	1.2	4.0	1.2	4.0
Market size:						
1-25	4.9	10.0	2.5	7.0	2.4	6.0
26-50	8.0	48.0	2.5	5.0	2.5	5.0
51-100	5.3	30.0	1.7	5.0	1.7	5.0
101-150	4.1	11.0	1.2	3.0	1.1	3.0
151+	3.7	15.0	0.9	3.0	0.9	3.0
Staff size:						
Staff 51+	7.2	48.0	2.5	7.0	2.6	6.0
Staff 31-50	4.5	11.0	1.5	4.0	1.4	4.0
Staff 21-30	4.4	15.0	1.0	3.0	0.9	2.0
Staff 11-20	3.5	23.0	0.8	2.0	0.7	2.0
Staff 1-10	1.2	2.0	0.3	1.0	0.3	1.0
Affiliation:						
ABC	4.8	30.0	1.5	6.0	1.6	6.0
CBS	5.3	48.0	1.7	5.0	1.5	5.0
Fox	6.1	30.0	1.5	5.0	1.5	5.0
NBC	5.5	35.0	2.0	7.0	2.0	6.0
PBS	1.6	6.0 -	0	0	0.3	1.0

For those who might have thought last year's jump in the amount of news on TV was an anomaly, this year's numbers prove that last year's were no fluke. Most stations were unchanged from last year, but where there were changes, the numbers almost always rose again, and the overall average amount of weekday news per station went up another 24 minutes from last year to an even 5 hours. That is, for the second year in a row, the highest average amount ever. Saturday remained the same at 1.7 hours while Sunday slipped 6 minutes to 1.6 hours.

For weekday news, every market size category stayed the same or rose; every staff size category rose except the very smallest newsrooms, which dropped slightly. Every network affiliate group went up -- even PBS stations. The weekend was virtually the same across the board.

The maximum amount of news produced more than doubled to 48 hours a day for one

station. That can happen because of all the stations producing news for other stations.

Changes in newscasts in the past year

	Added a newscast	Cut a newscast	No changes
All TV news	28.6%	13.7%	57.7%
Big four affiliates	28.2	12.5	59.3
Other commercial	42.9	18.2	38.9
Market			
1 – 25	39.6	20.8	39.6
26 – 50	22.6	16.1	61.3
51 – 100	41.9	13.5	44.6
101 – 150	19.7	10.0	70.3
151+	12.5	8.3	79.2
Staff size			
51+	43.7	15.5	40.8
31 – 50	29.5	6.6	63.9
21 – 30	19.1	4.3	76.6
11 – 20	12.5	25.6	61.9
1 – 10	0	23.1	76.9

More than twice as many stations reported adding a newscast as cutting one. Every market size reported more added than cut, but the biggest markets and the largest staff sizes were most likely to see increases. The percentage cut rose by almost 5 percent from a year ago, but all of that came out of the "no changes" category. The percentage adding news was virtually identical to a year ago.

Fox affiliates were more likely to add news than others, but there were no other differences on the plus side by affiliation or geography. Fox stations were a little less likely to cut news than other affiliates, and CBS stations were a little more likely to cut than the others.

Stations that added newscasts added them all across the day. Sunday came in first, split evenly between morning and evening. Right behind that was early evening, 5 pm - 7 pm. Then additions in the 7 am - 10 am area, mainly driven by Fox affiliates. Right behind that, in a three-

way tie, were 10 pm - 11 pm newscasts, 10 am - 12 noon newscasts and early morning additions, prior to 6 am. Just behind that was Saturday, again split between morning and evening. Noon to 2 pm newscasts came next, followed closely by 4 pm and 7 pm. Then it's just random newscasts at various other times.

Stations that cut newscasts overwhelmingly made cuts on the weekends -- both morning and evening. Way behind that were a few stations that cut in the 7 am - 9 am, noon to 2 pm and 5 pm - 7 pm area. Beyond that, it was just a scattered few cuts.

Amount of News Changes ... the past year

	Increase	Decrease	Same
All TV News	30.2%	11.8%	58.0%
Big four affiliates	29.8	10.8	59.3
Other commercial	50.0	8.3	41.7
Market size:			
1-25	33.3	19.0	47.6
26-50	22.0	12.2	65.9
51-100	37.9	8.0	54.0
101-150	33.7	10.8	55.4
151+	17.5	11.1	71.4

As with last year, most stations reported staying the same in amount of news. In fact, the percentage is the same as last year. Nearly three times as many stations reported increasing the amount of news as opposed to decreasing news, but the percentage of those decreasing went up 5 percent from a year ago.

Again, Fox affiliates were more likely to report gains, and CBS affiliates a little more likely to report cuts.

Amount of News Planned ... the next year

	Increase	Decrease	Same	Not sure
All TV news	32.6%	1.8%	57.4%	8.2%

Big four affiliates	31.6	1.7	57.9	8.8
Other commercial	50.0	0	41.7	8.3
Market size:				
1-25	34.9	1.6	54.0	9.5
26-50	26.2	4.8	59.5	9.5
51-100	32.6	1.1	56.2	10.1
101-150	34.9	1.2	56.6	7.2
151+	30.6	1.6	62.9	4.8

The percentage of news directors expecting to increase the amount of news this year is up 9 percent from the year before. The percentage expecting a decrease -- which was already small -- dropped in half. Even the percentage saying they were unsure fell by about a quarter.

The numbers are surprisingly consistent across a variety of breakouts although, once again, Fox affiliates are more likely than others to expect to increase the amount of news.

Almost one-third (31.5 percent) of all TV stations now produce news that's run on another local or nearby TV station. Interestingly, other than markets 26 - 50, which is smaller, close to the same percentage of stations in each market group are about as likely to run news on another station. The same is true for staff size. Other than the smallest staff size, 1 - 10, the other percentages are pretty close. CBS affiliates are a little more likely to run news on another station, and Fox affiliates are a little less likely, and stations in the Northeast are a little more likely to run news on another station as compared to other areas.

## TV news Staffing and Profitability

### TV Staff Size – 2010

	Avg full-time	Median full-time	Maximum full-time	Avg part-time	Median part-time	Maximum part-time	Avg total staff	Median total	Maximum total staff
All TV	34.5	29.0	130	5.3	2.0	156	38.3	32.0	172
Big four affiliates	37.0	31.0	130	5.5	2.0	156	40.9	34.0	172
Other commercial	21.2	18.0	64	4.3	3.0	16	24.1	18.5	68
Market size:									
1-25	54.8	63.5	130	9.2	3.5	72	61.3	67.0	161
26-50	50.6	57.0	92	4.7	3.0	16	52.6	57.0	103
51-100	36.8	36.0	80	3.9	2.0	18	39.1	40.0	80
101-150	26.5	26.0	46	6.3	1.0	156	31.4	28.0	172
151+	18.1	19.0	47	3.7	2.0	45	20.8	20.0	66

This past year represents another down year for staffing -- although not as bad as 2008.

In 2008, 1,200 TV news jobs were lost. In 2009, another 400 jobs disappeared. That's a drop of 1.5 percent.

Overall, the smaller markets, 100+ held steady, while the biggest markets, 1 - 25, got hit the hardest. Of course, stations there had larger staffs to begin with.

People should not confuse the decrease in total staffing with the idea that no one is being hired in local TV news. The typical TV station hired three people last year -- all of which replaced people who had left. In other words, there are still a fair number of people moving from job to job or moving into the field. The average station hired 3.7 replacements and 0.6 new positions. Stations in the Northeast were less likely to be hiring than stations throughout the rest of the country.

### Staff Size Changes ... the past year

	Increase	Decrease	Same	Don't know
All TV news	11.5%	64.1%	24.1%	0.3%

Big four affiliates	11.4	64.0	24.2	0.3
Other commercial	15.2	60.6	24.2	0

Nearly two-thirds of TV news directors reported staff cuts last year. That's an even higher percentage than the year before -- although fewer positions were cut than a year ago. The percentage of news directors reporting staff increases went down 4 percent from the year before. The numbers were fairly constant across all subsets, although CBS and NBC affiliates were less likely to increase staff size than others, and stations in the Northeast were, generally, more likely to be hit with layoffs.

#### Planned Staff Changes ... the next year

	Increase	Decrease	Same	Not sure
All TV news	22.7%	7.1%	60.8%	9.4%
Big four affiliates	23.0	7.8	60.8	8.4
Other commercial	27.3	3.0	54.5	15.2

These may be the most hopeful numbers in this year's survey because the figures represent a dramatic turnaround from the year before. Over 60 percent of news directors say they expect staff size to remain the same this year, but that's up nearly 20 points from last year. A year ago, almost a third of all news directors were expecting staff cuts; this year, the number is less than a quarter as large. Two and half times as many news directors expect to increase staff this year as compared to the year earlier.

That hiring is expected almost all across the board -- except for the very smallest stations (1 - 10 staffers) and PBS affiliates.

#### TV News Budget ... the past year

	Increase	Decrease	Same	Don't know
All TV news	9.6%	65.1%	21.8%	3.4%
Big four affiliates	8.6	67.7	21.1	2.6
Other commercial	23.3	42.9	28.6	4.8

Market size:				
1-25	10.6	61.7	19.1	8.5
26-50	10.3	65.5	24.1	0
51-100	8.0	74.7	16.0	1.3
101-150	13.1	60.7	23.0	3.3
151+	6.3	58.3	31.3	4.2

Last year, I noted that the budget numbers were the worse I had seen in 15 years of doing this survey. But these numbers make last year look like the good old days. A year ago, a quarter of the news directors said their budgets had increased. This year, it's under 10 percent. Last year, just over 40 percent said their budgets had decreased; this year, it's almost two-thirds.

There were no meaningful differences no matter how I broke down the numbers.

#### TV News Profitability ... 2000 - 2010

	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000
Showing profit	47.8%	52.7%	55.4%	56.2%	57.4%	44.5%	58.4%	55.3%	54.9%	56%	58%
Breaking even	14.6	11.6	11.5	11.5	8.1	24.2	10.4	13.6	11.6	13	11
Showing loss	8.3	14.5	10.5	6.4	10.0	12.1	9.2	9.2	11.2	10	11
Don't know	29.2	21.3	22.6	26.0	24.4	19.2	22.0	21.9	22.3	21	20

Outside of the anomaly of 2005, this is the lowest profit percentage that I've seen in my 16 years on the survey. At nearly 5 percent, it's also the biggest one-year drop in profits (outside of 2005). Break even rose to its highest level, but loss dropped to one of its lowest levels ever. Note also that "don't know" rose to the highest level ever, too.

#### TV News Profitability ... by Size and Affiliation – 2010

	Showing profit	Breaking even	Showing loss	Don't know
Market size:				
1-25	42.9%	14.3%	11.9%	31.0%
26-50	51.7	24.1	0	24.1
51-100	48.6	9.5	13.5	28.4
101-150	50.8	16.9	3.4	28.8
151+	45.8 -	12.5	8.3	33.3
Staff size:				
51+	48.5	14.7	5.9	30.9
31-50	55.7	11.5	4.9	27.9

21-30	42.6	21.3	4.3	31.9
11-20	46.2	15.4	12.8	25.6
1-10	15.4	23.1	23.1	38.5
Affiliation:				
ABC	47.1	8.6	10.0	34.3
CBS	54.5	15.6	6.5	23.4
Fox	52.9	8.8	8.8	29.4
NBC	46.5	18.3	4.2	31.0
Big four affiliates	51.1	12.1	6.7	30.0
Other commercial	31.8	31.8	18.2	18.2

Geographically, stations in the Northeast were less likely than others to make a profit on news and more likely to lose money. Interestingly, it used to be that the smaller the market and the smaller the station, the less likely that the news director knew whether the station made a profit on news. This past year, an increasing number of news directors -- across the board -- don't know the answer.

#### Percentage of TV Station Revenue Produced by News – 2010

	Average	Median	Minimum	Maximum	Not sure
All TV news	44.7%	45.0%	5.0%	80.0%	71.4%
Market size:					
1-25	46.9	42.2	20.0	80.0	67.3
26-50	39.7	40.0	30.0 -	50.0	64.5
51-100	45.3	50.0	7.0	73.0	73.7
101-150	43.1	46.0	6.0	55.0	75.4
151+	42.6	40.0	5.0	65.0	70.8
Staff size:					
51+	44.5	43.0	20.0	73.0	70.4
31-50	42.3	50.0	6.0	60.0	72.6
21-30	47.8	50.0	7.0	80.0	76.6
11-20	42.8	42.5	30.0	55.0	75.6
1-10	22.5	22.5	5.0	40.0	76.9
Affiliation:					
ABC	42.1	45.0	22.0	67.0	75.0
CBS	43.0	42.6	6.0	73.0	69.6
Fox	37.9	35.0	7.0	66.0	70.3
NBC	49.5	50.0	6.0	80.0	71.1
Big four affiliates	45.4	45.0	6.0	80.0	70.2
Other commercial	38.4	40.0	5.0	60.0	73.9

The average revenue actually rose slightly from last year's 43.5 percent, and the median rose to

45 percent from 40 percent last year. A note of caution, though. The percentage of TV news directors who said that they didn't know how much revenue came from news soared from a year ago. In fact, it's the first time more than half the news directors reported that they didn't know how much station revenue news brought in. The overall numbers should still be good, but I'd urge caution in judging the various subsets which necessarily involve fewer respondents.

## Radio

Radio news changed little in 2009. The amount of news on the air is just about the same as a year ago, and the typical radio news staff remained at one. If anything, radio news is even more centralized now than it has been, with the typical news director overseeing the news on three stations, and more than 80 percent of radio news directors saying they have additional station responsibilities beyond news.

Average Minutes of Locally-Produced Radio News – 2010

	All radio	Major market	Large market	Medium market	Small market
Weekdays:					
AM drive	27.9	41.6	21.6	27.9	27.2
Midday	12.1	10.6	8.0	13.3	12.4
PM drive	14.3	13.3	9.1	16.8	13.7
Night	3.0	2.3	0.8	5.3	1.9
Total weekday	57.3	67.8	39.5	63.3	55.2
Saturday:					
AM drive	15.4	21.4	9.8	18.4	12.8
Midday	6.9	10.0	3.5	6.0	7.4
PM drive	4.1	0	1.0	5.9	4.4
Night	2.6	0	0	6.0	1.5
Total Saturday	29.0	31.4	14.3	36.3	26.1
Sunday:					
AM drive	7.2	4.2	3.5	8.1	8.2
Midday	5.7	9.2	1.0	5.2	5.8
PM drive	4.0	4.5	1.0	5.9	3.0
Night	2.5	0	0	6.0	1.5
Total Sunday	19.4	17.9	5.5	25.2	18.5

Overall, the numbers are little changed from a year ago. Total weekday news rose by less than 5 minutes per day. Weekend went up slightly more. Major market stations dropped in news; large markets stayed about the same; medium and small markets rose modestly.

The larger the staff, the more news the station produced. Number of stations in a market

made no difference. Commercial stations ran more local news than non-commercial ones; group-owned stations ran a little more news than independents; and stations in the Northeast tended to run more news than stations elsewhere.

#### Radio Staff Size – 2010

	Avg. full-time	Median full-time	Max full-time	Avg part-time	Med part-time	Max part-time	Avg total staff	Med total staff	Max total staff
All radio news	2.1	1.0	16	1.9	1.0	16	3.3	2.0	22
Market size:									
Major	3.7	1.5	16	1.5	1.0	7	4.9	2.5	22
Large	2.7	1.0	9	1.5	1.0	4	3.4	2.5	13
Medium	2.0	2.0	9	2.3	2.0	10	3.4	3.0	15
Small	1.2	1.0	3	1.9	1.0	16	2.6	2.0	17

Without a few extraordinary radio news operations that we had last year, the average radio news staff fell back down to 2.1. The median, or typical, radio news operation remained at one. With part time holding at one, the total median staff size -- full plus part time -- fell to just two. Interestingly, the number of stations in the group did not change the number of newspeople -- which almost always remained at one. No difference between group or independent, but stations in the Northeast were more likely to be a little larger.

#### Changes in Radio News, Staff and Budget in the last 12 months and planned for the future – 2010

	Increase	Decrease	Same	Not sure
Amount of news the past year	27.6%	12.2%	60.2%	0
Plan to change amount of news next year	17.6	0.8	73.6	8.0
Total news staff the past year	12.8	20.0	67.2	0
Plan to change amount of staff next year	5.6	3.2	75.0	16.1
Change in news budget from the year before	9.1	18.2	45.5	27.3

Major market, group-owned and non-commercial stations were most likely to have

increased the amount of news in the last year. Non-commercial and independent stations are a little more likely to expect to increase the amount of news this year. Non-commercial, group-owned and the larger local groups were the most likely to have increased staff in the last year -- although all those numbers were small. Very few stations plan to either increase or decrease staff this year, although stations in major markets are a little more likely to plan to increase. A little over twice as many stations said the budget went up as compared to a year earlier. But two and a half times as many said the budget went down compared to a year earlier. Non-commercial and major market stations were more likely to say the budget went up. Group-owned stations were more likely to say the budget fell.

#### Radio News Profitability ... 2000 to 2010

	2010	2009	2008	2007	2006	2005	2004	2003	2002	2001	2000
Showing profit	13.9%	11.8%	21.0%	29.1%	18.1%	19.6%	22.5%	25.2%	15.2%	17%	25%
Breaking even	13.9	16.7	13.7	13.1	17.6	14.4	17.1	13.8	13.9	17	15
Showing loss	9.8	9.8	10.5	8.6	6.4	3.1	7.2	2.4	7.3	0	7
Don't know	62.3	61.8	54.8	49.1	58.0	62.9	53.2	58.6	63.6	66	53

This year's numbers look a lot like last year's. Group-owned stations were more likely to report a profit on news.

#### Radio News Profitability by Market Size – 2010

	Showing profit	Breaking even	Showing loss	Don't know
Major market	0%	7.1%	7.1%	85.7%
Large market	17.6	29.4	11.8	41.2
Medium market	13.3	13.3	8.9	64.4
Small market	15.6	11.1	11.1	62.2

Major markets are those with 1 million or more potential listeners. Large markets are from 250,000 to 1 million. Medium markets are 50,000 to 250,000. Small markets are fewer

than 50,000.

#### Number of Stations Where the Radio News Director Oversees the News – 2010

No. of Stations	Percentage
One	19.5%
Two	26.8
Three	8.7
Four	8.1
Five	14.8
Six	12.1
Seven	2.7
Eight	2.7
Nine+	4.7
Overall	Number
Average	3.3 locally + 1.1 elsewhere
Median	3.0
Maximum	22 locally + 50 elsewhere

Although the change hasn't been steady, radio news directors, over the years, have been overseeing more and more stations. Last year, 30.7 percent of news directors oversaw the news on more than three stations. This year, nearly half, 48.5 percent, do that. The average number is up from 3.0 to 3.3 locally and from 0.7 to 1.1 somewhere else.

Where more than one related station ran news in a market, almost two-thirds of them (66.2 percent) had a centralized newsroom.

#### What Else Radio News Directors Do – 2010

This year, 81.4 percent of radio news directors said they had other responsibilities at the station beyond news. That's up from last year's 77.9 percent and just behind the all time record of 83.1 percent two years ago. It's highest for news directors who are a staff of one, with a single station in one market and in major markets.

#### What else radio news directors do

Other job	Percentage
Talk show host	18.0 %
Program Director	15.7
Announcing (including sports and weather)	11.2

Production	11.2
Operations	11.2
General Manager	10.1
Public Affairs	7.9
Sales	4.5
Other	10.1

Most of these numbers are up just slightly from the last few years, although sales and other are both down from last year.

***Bob Papper is the Lawrence Stessin Distinguished Professor of Journalism and chair of the Department of Journalism, Media Studies, and Public Relations at Hofstra University and has worked extensively in radio and TV news. This research was supported by the School of Communication at Hofstra University and the Radio Television Digital News Association.***

### **About the Survey**

The RTDNA/Hofstra University Survey was conducted in the fourth quarter of 2009 among all 1,770 operating, non-satellite television stations and a random sample of 4,000 radio stations. Valid responses came from 1,355 television stations (76.6 percent) and 203 radio news directors and general managers representing 301 radio stations.

Some data sets (e.g. the number of TV stations originating local news, getting it from others and women TV news directors) is based on a complete census and is not projected from a smaller sample.