

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

In the Matter of)
)
The Future of Media and Information) GN Docket No. 10-25
Needs of Communities in a Digital Age)
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To: The Commission

**COMMENTS OF AMERICAN PUBLIC MEDIA
REGARDING THE FUTURE OF MEDIA AND INFORMATION NEEDS OF
COMMUNITIES IN A DIGITAL AGE**

INTRODUCTION

The FCC is right to seize this moment to deeply explore the future of media in America. The ongoing revolution in communication technology is creating unparalleled turbulence in the media industry as well as the opportunity to create a new media that is more engaged with and relevant to every American. The collapse of the commercial model for financing serious journalism threatens to topple the titans of the fourth estate and calls for immediate action ensuring the watchdog role of the news media is preserved. Most importantly, while Americans' have more access to news and information than ever before, they have less trust in the accuracy and impartiality of that information.

Now is a time for the FCC, the CPB, Congress and the Administration to exercise their authority to build a stronger public media in America. Through appropriate

regulation and increased funding, we can ensure that everyone has access to news, information and cultural programming they can trust and rebuild the relationship between citizens and the media based on integrity, impartiality and the shared goal of a better America.

OVERVIEW: AMERICA NEEDS A ROBUST NETWORK OF STRONG PUBLIC MEDIA ORGANIZATIONS

Americans need high-quality, trustworthy media just as they require access to clean water and electricity. The well-being of our country demands a reinvigorated, modern public media that guarantees the free flow of news, information, ideas, arts, cultural and educational programming and creates centering institutions in an increasingly polarized media environment. The United States must revolutionize its public media now to remain competitive in the global economy, maintain strong communities and enable our citizens to make decisions vital to a healthy democracy.

We propose A New Public Media, a robust network of strong, independent public media organizations with a public service mission developed in alignment with our existing public broadcasting system. A New Public Media leverages the strength of broadcast – including free and ubiquitous access to public service media by virtually all Americans and its power to direct audiences to digital services – and takes full advantage of the powerful communications tools of the digital age.

Anchor public media organizations in the top 25 regional markets should form the backbone of A New Public Media ecosystem in the United States. These organizations already have the infrastructure and could work with community and national public media to produce, aggregate and distribute high-quality broadcast and broadband news, arts and educational services that are highly relevant to a large and diverse local audience. These established public broadcasters benefit from many years of federal investment; a diversity of revenue sources including membership, underwriting and philanthropic support; and an engaged audience that rivals that of commercial media. While many require strengthened leadership and governance, they have the “bones” on which to build a revitalized public media system.

From hyper-local to global, public media programming builds bridges among and within communities. Anchor public media organizations will foster collaborations that guarantee relevant news reporting and insightful cultural content not available from commercial sources. Along with national public broadcasters (such as NPR, American Public Media, PRI and others) anchor organizations will support investigative and enterprise journalism units that draw on the best insights of the public and ensure that the media continue to reliably play their watchdog role in our democracy.

High-speed broadband networks must connect anchor organizations to other public institutions including schools, libraries, hospitals, colleges and universities, allowing for collaboration and innovation across geographies. These networks will level the playing field for low income and rural communities with their well-resourced counterparts. Anchor public media organizations will support universal access to

broadband media content through public online hubs in schools, libraries and community centers.

Creation of A New Public Media will provide every American with nearly limitless access to unbiased information and analysis of local, national and global issues; it will be an expanded platform for educational content and local arts programming as well as a resource for every American who wants to better understand our world. To achieve this goal, the FCC must act as decisively as it did in 1945 when it created public broadcasting with the set-aside of the NCE band. This one act, which allowed public service media organizations to distribute content competitively with commercial media, has accrued innumerable benefits to the American people for the past half century. Actions the FCC takes now can ensure those benefits endure and create a new public media system that has an even greater positive impact in the digital age.

THE DEVOLUTION OF COMMERCIAL MEDIA IS A WAKE UP CALL FOR PUBLIC MEDIA

On July 23, 2010 forty-four people, including three mayors, two state assemblymen and five rabbis, were arrested and charged with corruption in New Jersey. In an effort to explain why such corruption persists in the state, where almost 150 public officials have been arrested in the past decade, Michael Barbaro of The New York Times stated, "... the state's news organizations, once vigorous watchdogs, have been decimated by a deep industry downturn." The fourth estate, once the indispensable

guardian of the guardians, no longer has the resources to ensure that our citizens are well informed and capable of making the decisions that will guarantee a prosperous society.

America is the success that it is because of knowledge, education, information, innovation and opportunity. A big piece of that success is based on America's "informed citizenry" – the circumstance that knowledge has been infused in the populace through formal and informal education, through media, mentors, and a wide variety of institutions. The concept has been at the heart of keeping the electorate sufficiently informed to elect a representative government that embraces freedom, that democratically governs its society, and that serves the need for knowledge and insight of its citizens as the world becomes more complex.

Now, we are witnessing the traditional media either morph into a business model that maximizes profit by appealing to liberal or conservative extremes (Rush Limbaugh, Glen Beck, Keith Olbermann, Ed Schultz) or sit on the verge of bankruptcy (Chicago Tribune, Los Angeles Times, The Associated Press). The newspapers, television news stations and information-oriented web services that remain in the business of providing knowledge, information and insight are failing to obtain a reasonable return for their investment without resorting to the more successful formula of polarizing their content.

In the future, quality information, news, insight and educative content may only be able to succeed in a nonprofit environment, where revenues are reinvested in the development of content, where subsidies are justified, and where mission, vision and values drive the product.

As one example, at Minnesota Public Radio we offer daily, in-depth reporting with a balanced perspective on regional, national and international events. MPR News's 83-member regional newsroom is the largest in public radio with bureaus scattered throughout the state. Minnesota Public Radio and American Public Media's family of Web sites, including the newly launched MPR NewsQ, are among the most heavily trafficked in all of public radio with more than 8.8 million page impressions each month.

If the framers of the Constitution and its key amendments were alive today, they might well advocate not only for "freedom of speech and the press", but also (and equally importantly) for some governmental or public assurances to maintain the critical information flow that such freedom is meant to guarantee.

A NEW MANDATE FOR PUBLIC MEDIA: TOUGHER STANDARDS

We are unlikely to return to a time when media dedicated to serious journalism will provide acceptable returns to investors. That means that the intended benefits of a constitutionally-guaranteed free press and of the regulatory requirement that the public airwaves serve the "public interest, convenience and necessity" are in jeopardy.

Fortunately, the American public media system, with some 40 years of development under its belt, is finally in position to play its destined role. Unfortunately, the system has been allowed to underperform for decades without consequence. As a result, it is largely ineffective when measured against its mission or against its international peers.

In order to create a truly relevant and robust public media in American, the FCC and Corporation for Public Broadcasting (“CPB”) must systematically raise the bar for public media organizations. We can no longer afford to give away valuable spectrum resources and public funding to organizations simply because they qualify. Instead, the FCC and CPB should create a high standard for audience engagement and local content origination for all public media organizations that receive federal funding or are licensed broadcasters.

The FCC should act in concert with the CPB on the following actions:

- Initiate a new license renewal process for CPB-funded public media organizations that requires a demonstration of significant public service and locally originated content, moderated by market size.
- Require an accounting illustrating that all media related revenue be invested in an audited public media entity. Eliminate the practice of some colleges and parent companies of charging "overhead" fees that cream off essential public media funding for other purposes.
- Consider stopping the NCE waiver for main studios beyond some reasonable distance from a headquarters station (for example, within a state or within a certain radius) to encourage regional service and more local origination and discourage “national stations”. The national station concept can be accomplished by satellite radio. Terrestrial radio should

not be comprised of legions of transmitters fed by satellite without local studios.

- Support the development of public interest broadband capacity connecting public media centers and their audiences at affordable cost to the producers. These new modes of distribution will require subsidy if they are going to be used at a significant scale by public media.
- Require a community board or advisory board for all CPB-funded public media organizations to connect it with community leadership. The current standard, which requires an advisory board for a community licensee but not for a public university, was a legislative error.
- The CPB NCE-FM standards that call for broadcasting eighteen hours a day, two full time employees and two full time equivalents paid at least minimum wage as a condition of funding are actually lower in some ways than those that were set in 1970. These standards assume a station model that predates our current definition of a large and established public media. These need to be re-evaluated as standards of performance appropriate to communities of various sizes.
- Consider the concept of a rigorous accreditation process, similar to the college and university validation process, to measure impact and continued eligibility for CPB funding.

- Encourage models that reduce overhead and duplication and provide incentives for operational consolidation.

NEW MODELS FOR NON-COMMERCIAL JOURNALISM MUST DIRECTLY ENGAGE THE AUDIENCE AS PARTNERS IN NEWSGATHERING

For the past six years, American Public Media has pioneered a new journalism of partnership and engagement which serves as a “public square” for citizens’ concerns, experiences, and insights. Drawing on the diverse experiences and insights of regular citizens, Public Insight Journalism identifies trends, creates distinctive content, diversifies audiences, and builds connections within neighborhoods and communities. More than a dozen newsrooms around the country have adopted PIJ, including:

- MPR (St. Paul, MN)
- NHPR (Concord, NH)
- KCFR (Denver, CO)
- OPB (Portland, OR)
- WUNC (Chapel Hill, NC)
- St. Louis Beacon/KETC (St. Louis, MO)
- KUOW
(Puget Sound, WA)
- WNYC (New York, NY)
- KPCC (Los Angeles, CA)

The backbone of PIJ is the Public Insight Network, a repository of 86,000+ individuals who serve as sources for newsgathering and reporting efforts, and a team of analysts who build meaningful and lasting connections with those sources. This networked approach to journalism integrates public knowledge and a much wider diversity of sources directly into a newsroom's editorial process. It gives citizens a voice in supplying insight to major news organizations and results in informational content to make sound and informed decisions about themselves, their families and their communities. The Public Insight Journalism model inspires a wider culture of engagement among all communities. Together, journalists and the audiences they serve become partners in seeking truth and relevance, revitalizing the democratic bedrock that is a free, robust and unbiased press.

Both the Public Insight Network participants who are helping to set the news agenda and the reporters who use the Network as sources for their stories say that PIJ has fundamentally changed the way that audiences and newsrooms interact with and inform each other. As a result of these efforts and the other accomplishments, Public Insight Journalism is frequently cited as an exemplary innovative model for engaging audiences and reforming media by journalists and thought leaders in the industry.

PUBLIC MEDIA ORGANIZATIONS MUST LEAD THE WAY IN BROADBAND ADOPTION AND INNOVATION

The public media community now must confront that future laid out by the National Broadband Plan with courage and energy. A new network of noncommercial

journalism enterprises, enabled by broadband, can fill the market gap in commercial news and cultural programming. Greater experimentation and successful linkages between the major foundation of the public radio community and the contributions of these important startups will be a key indicator of success.

The FCC should promote the adoption of broadband as a public media service by providing subsidized access to current broadband networks and future ultra-high speed networks to qualified public media organizations. If broadband is a series of pipes that connect Americans with information, the FCC should concern itself with the size and location of those pipes as well as the quality of information that moves through them. Providing public media organizations with a free or subsidized connection to these broadband networks will mean every American has access to news, information and cultural content that is relevant to them and held to the highest journalistic standards.

Public Media Broadband and Schools

The challenges of public media are modest compared with those of the public schools. In the Network Age, children have been the early adopters ready to embrace new technologies. Research in literacy and learning has shown that digital technologies such as mobile platforms and gaming can yield astounding results in student achievement and family engagement.

Schools also struggle with their own legacy; they have habitually treated students as if each new generation is the same as the last. Conversely, public media efforts have been impressively nimble in meeting the changing student. The innovations of *Sesame*

Street benefit children all over the world. *PBS Kids* dominates the web with high-quality content and games. WGBH's *Teacher's Domain*, Maryland Public Television's *Thinkport* and KQED's *Quest* are all education services optimized for broadband.

The challenge in education is relatively simple: Widen the bandwidth to schools and public media and support content for this critical public service. We can point to great examples of success in places as different as the Bay Area and Lafayette, La. In a broadband project linking these communities, students from widely separated classrooms collaborate online to develop scientific visualizations, video games and digital media productions. Their teachers can guide this next-generation curriculum because they have the bandwidth to connect in real time. They can treat the Internet like a platform for effective teaching and not a rare, exotic distraction. This work is made possible by the collaboration of two partners from different sides of the public media system—the Bay Area Video Coalition and Louisiana Public Broadcasting. For this next-generation program, broadband is the connective tissue.

UCAN: Creating a Broadband Network of Community Anchors

The National Broadband Plan calls for creation of the Unified Community Anchor Network. The UCAN would serve as a network of networks to bring next-generation Internet broadband to the nation's public sector and nonprofit organizations that connect citizens to our democracy. These are the same stakeholders who could be great local partners in integrated delivery of content and services.

The great potential of UCAN framework can be seen in the Public Media Map under development by the National Center for Media Engagement in collaboration with CPB's Public Affairs Initiative. This online map at [www. publicmediamaps.org](http://www.publicmediamaps.org) tells the story of a developing Public Media Ecosystem.

The National Broadband Plan makes two distinct observations for Broadband and Public Media: "First, broadband technology can only make a valuable contribution to our civic dialogue if everyone has access to it. Second, public media will play a critical role in the development of a healthy and thriving media ecosystem." (National Broadband Plan, page 303)

The new ecosystem described in the National Broadband Plan is comprised of layers:

Connectivity: It all begins with the infrastructure that allows communities to reliably and efficiently connect to the knowledge economy. This means widely accessible, high-speed broadband connections to the Internet.

Community Anchors: Schools, hospitals, libraries, colleges, public safety agencies, local governments and other community anchor institutions play critical roles in economic development, job training, education, health care and access to services. High-capacity broadband is the key infrastructure they need to provide 21st-century services to their communities.

Universal Access: Like water, electricity and roads, high-speed broadband must be within reach of all Americans. You should be able to participate in the knowledge economy regardless of who you are, where you live or how much money you make.

Public Media: In an age of increasingly segmented commercial media, access to relevant information and civil dialogue becomes more important than ever. Through high-speed broadband connections, audiences all over the United States—not just those in or near the major urban centers—can access the range of comprehensive, objective content about the issues that truly shape their communities and their world.

Community: The nation’s social fabric has gone online. That has driven incredible innovation and economic development for the global economy. America can be the laboratory for both democracy and innovation. Broadband is the infrastructure to make it happen.

With effective leadership and a renewed commitment to building the right infrastructure and services for the American people today, the funding and community investment will follow. The challenges are many, the dynamics are complex, and resources are in short supply. The benefits have also never been more important for our nation. In a world that has outgrown the town meeting; public media are nothing less than the content for our democracy

CONCLUSION

Public media may be the best alternative to accepting a polarized, partisan media as the new normal. With the support of the FCC, CPB, Congress and the Administration, we can position and restructure the existing patchwork system of local, regional, and national public media companies into a robust and relevant public media system. This system will accept the mantle of enterprise and investigative journalism, relevant cultural programming, community engagement and local content creation shed by the commercial media. While there may not be profit in these endeavors, they are vital to the future of our communities and our democracy.