

MB Docket No. 09-182
Solicitation of Suggestions for Additional Studies

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Issue: None of the media ownership studies covered by the Media Bureau's RFQs involves content analysis of local news. Instead, the quantity of news programming is used as a proxy metric for localism. But as recent research by the Norman Lear Center has demonstrated (see <http://www.learcenter.org/pdf/LANews2010.pdf>), as little as one-quarter of news programming time is actually devoted to local news. As a result, the Media Bureau's studies will for example count a minute of an Atlanta television station's coverage of a car chase in Los Angeles the same as a minute of coverage of the closing of an Atlanta clinic; a minute of teasers and bumpers in Chicago will be counted the same as a minute of coverage of the Chicago economy; a minute of coverage by a Seattle station of a Lady Gaga concert in London will be counted the same as a minute of coverage of a local ballot issue in Seattle.

Suggestion: The Media Bureau should issue an RFQ for a study of localism as a function of media ownership, a study defining localism as local news content rather than gross hours of local news programming.

Methodology: Constructing a scientific sample of local news markets and station ownership is straightforward; it would use the same taxonomy of local market ownership structures as the studies covered in the MB 09-182 RFQ. It is equally straightforward to employ scientific performance metrics for a content analysis of localism. Two examples: (1) Professor Danilo Yanich, in his 2009 study, *Local TV News: Cross-Ownership, Markets S& Content on Local TV News*, (<http://www.ccrs.udel.edu/sites/ccrs.udel.edu/files/sites/udel.edu.ccrs/files/Cross-Ownership,%20Markets%20&%20Content%20on%20Local%20TV%20News.pdf>), uses a localism metric derived from an FCC study conducted in 2003. (2) The Project for Excellence in Journalism, in its 2007 study *We Interrupt This Newscast: How to Improve Local News and Win Ratings, Too*, uses a Community Relevance scoring system to measure localism that was designed by an extensive team of news professionals and academics.

Analysis: In pursuit of the 2010 Quadrennial Media Ownership proceeding, there is no basis for evading the necessity of content analysis. Objective performance metrics of localism exist, and a potential industry challenge -- that employing them would constitute an overreach by the FCC that violates the First Amendment -- is political special pleading that is belied by the Commission's own history of content analysis, and by the industry's own use of content studies when it suits them.