



In the Matter of Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, MM Docket No. 00-168

Comments of Media Reform South Carolina

Media Reform SC (MRSC) is a nonpartisan group of South Carolina citizens concerned about threats to freedom of the press and dedicated to encouraging the free, full, and accurate flow of information in order to preserve and enhance democracy. We believe that diverse, reliable, objective information is necessary for citizens to make the decisions needed to sustain vibrant democratic institutions and promote healthy, prosperous lives for everyone.

In the late summer and fall of 2011 MRSC began studying the consolidation of newscasts by two local television stations in Charleston, SC (WCSC-TV, a CBS affiliate and WTAT-TV, a Fox affiliate). As part of our study, we visited each of the stations to examine any pertinent information in their public files.

We thank the Commission for seeking comment on improving public access to broadcasters' public files. We believe that our observations regarding our attempts to study the stations' public files may provide valuable insights into how to make accessing and viewing the public files a more user-friendly experience.

- Public files are available to be examined only during normal business hours. Attempting to arrange a time for group members to meet and physically visit a television station during business hours proved to be difficult, particularly for our members who work.
- Local weather and traffic conditions can impede the process of examining files. A drenching lowcountry rain forced us to reroute our trip to WCSC-TV and prevented one of us from meeting up with the rest of the group on time. This cut back on the time we had to look at the files.
- Station staff members may or may not be prepared to provide access to the public files. At both of the stations we visited, staff members seemed to express surprise that we wanted to look at their public files. MRSC members were also asked what our search was "in reference to." At WTAT-TV, we were asked to come back 2½ hours later, which we did (having left a list of the particular files we hoped to see). The delay cut significantly into the amount time we had to examine files at the station. When we returned, the station's Business Manager greeted us warmly and provided access to the desired files and all other public files.
- Requesting copies of the public documents can be costly, and pricing across stations is not consistent. WCSC-TV charged us 25 cents per page for copying. They would not

permit us to take the documents to a copy center for cheaper copying. WTAT-TV charged us a more reasonable 5 cents per page for copying.

- Both stations saw to it that they had the name and address of one of us – WCSC-TV by requiring us to fill out a form for copying and WTAT-TV by requiring that we pay for copies by check.
- Public files are voluminous and tend to be filed in an arcane way that may meet the letter of broadcast law but that can baffle ordinary citizens attempting to understand how their local media operate. We found ourselves feeling overwhelmed as we attempted to identify the files that clearly pertained to our questions. This feeling was exacerbated by our not having unlimited time to spend looking at files. An additional complicating factor is that many of the files appear to pertain to different years. It was difficult to determine which file had the most current information and heroic amounts of attention would have been required to determine whether any changes had occurred over time.
- At neither station could we find information on the news sharing agreement between WCSC-TV and WTAT-TV. The Business Manager at WTAT-TV told us that the news sharing agreement had never been in the public file but was treated like any other agreement with a vendor who served the station – like the agreement with the company who takes out their trash.

Media Reform SC came away from its experience examining two broadcasters' public files believing it would be of inestimable help if the files were available online. Online access to these files would address many of the problems MRSC encountered in our public file visit, including station visiting hours limitations, lack of staff preparedness to accommodate onsite public file viewing, and the expense and wide variations in the costs of copying public file documents.

We hope that the Commission will consider requiring such online files to be as accessible as possible – in terms of ease of finding them on line, the terminology in which they are stated, and the manner in which they are organized. Accordingly, we respectfully offer the following suggestions:

- Files should be organized according to categories that are explained in layman's language and thus accessible to the average citizen.
- Files within categories should be organized by year.
- News sharing agreements and shared services agreements should be in the public files.
- A list of all the types of public documents along with a clear, public-friendly explanation of each would be extremely valuable to citizens who want to explore the workings of their local media.

- There should be a referee of some sort to which citizens can readily appeal if they are unable to find material that should be in a broadcaster's public files.

Media Reform SC thanks the Commissioners and staff of the Federal Communications Commission for considering our comments and requests.

Respectfully Submitted,

Faye B. Steuer, for Media Reform SC (<http://mediareformsc.org/>)

843-884-7766

steuerf@comcast.net