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TO: FCC Chairman Julius Genachowski
FCC Commissioner Mignon Clyburn
FCC Commissioner Robert M. McDowell

FROM: **Members of Howard Media Group:**
Dr. Carolyn M. Byerly
Dr. Yong Jin Park
Professor Reggie Miles
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RE: MM Docket No. 00-168 , Standardized and Enhanced Disclosure Requirements
for Television Broadcast Licensee Public Interest Obligations

DATE: January 16, 2012

We appreciate the opportunity to comment on the issue of disclosure in broadcast station operations. We are journalism and media educators and scholars at Howard University, a historically Black institution that is specifically concerned with fairness and equality in public policy concerning operations of the media industries.

We believe that the public interest can only be served when there is greater transparency in the way that broadcast stations operate. Greater transparency requires there be greater disclosure (i.e., detail) about their sources of revenue and the relationship of that revenue to content. Further, we believe that such disclosure should be brought up to present-day standards by using the Internet. Thus, we affirm the FCC's proposal under consideration to require broadcast stations to post information to the Internet concerning their sources of revenue and what that revenue buys. However, we also urge the FCC to go further by finding ways of putting more teeth into its present Payola Rules prohibiting pay for play by specifically stopping stations from (1) using video footage that they have received from paid sponsors without labeling the source, and (2) otherwise allowing paid sponsors to determine the content of news, public affairs or entertainment programming.

We are convinced that the monitoring of stations' compliance with such standards should involve citizen oversight. The Commission will enable the public to take a more active role in monitoring stations by requiring stations to post their revenue sources online together with what these revenues actually paid for. Such information would include everything from candidate ads, to product ads, to news stories, to comments and information conveyed through talk shows and other similar programs.

There are ample data available to show how commercial interests presently shape political, commercial and other content in television and radio broadcasting. For a substantive recitation of some of these, we look to Steve Waldman's recent commentary in *Columbia Journalism Review* (Dec. 29, 2011). Waldman was author of the FCC's own commissioned report, *The Future of the Media*. But the chorus of those demanding that stations be required to post basic information about revenues and their relationship to content online where citizens can access it is much greater than Mr. Waldman. Free Press's comment recently submitted bears the signatures of more than quarter of a million citizens demanding FCC approval for greater broadcast transparency through disclosure. Such expansive support for such policies cannot be dismissed – it greatly outnumbers and outweighs NAB's members who are more concerned with profit than serving their publics.

We take this opportunity to encourage one further act of transparency – that of the commission's own work. While the FCC electronified the filing of Form 323 about two years ago, it has yet to make the data on broadcast ownership contained in these files available in an accessible format that the public can see and understand. We do not believe this is what serves the public interest and urge the commission to do what all other federal agencies that handle large data bases (e.g., Department of Justice, U.S. Census Bureau) have done and post basic statistical information for citizen consumption to the Internet.

Thank you for attention to our concerns.