

February 8, 2012

**Annenberg School
for Communication
& Journalism**

The Norman Lear Center

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Docket No. 11-189

Dear Chairman Genachowski,

We write as scholars whose research since 1998 has focused on the performance of local TV stations in meeting their public interest obligations. We are signatories to the letter from the PIPAC/SEED coalition submitted to the FCC on January 27, 2012; this letter adds comments from our own perspective.

[Our work](#) has provided data on how more than 75 stations in media markets ranging in size from New York to Des Moines have covered politics, campaigns, elections, government, and community issues, including comparisons with their coverage of other topics such as entertainment, sports and weather. We collect our data by (1) recording statistically representative samples of stations' news programming; and/or (2) copying the public files of stations; and/or (3) purchasing proprietary data about the content of their news programming.

This methodology is expensive. We estimate that we have dedicated nearly \$350,000 of grant-funded research support to gathering local news content. These funds have come from foundations, from our universities, and from community philanthropy, and securing these grants has become increasingly more difficult (e.g., funders were unable to support the collection of local news content during the 2008 presidential campaigns).

This methodology can also be inadequate. The public files of some stations have turned out to be inaccessible, incomplete, and/or irrelevant to their public interest obligations. In addition, the financial

constraints we face in collecting content mean that we often must make painful decisions between gathering more news on a smaller number of stations or less news on a larger number of stations.

On both fronts, the new improved data collection proposed by the FCC in the Notice of Inquiry will provide researchers with a statistically relevant snapshot of the types and amount of programming that broadcasters air in response to community needs. It will also mean that securing this data will not be dependent on the changing priorities and limited resources of the nonprofit sector.

Gathering and analyzing this data have been important both to the FCC and the public. Our findings have been cited in hundreds of academic [studies](#) and publications, print and broadcast [stories](#), speeches, reports, [testimony](#) and community [meetings](#). We have sometimes found that our work has provided the only available data for assessing performance. To cite just one example: When the Gore Commission, whose co-chairman and some of its members were drawn from the news industry, proposed a voluntary standard of 5 minutes of candidate-centered discourse in the 30 days before an election, our studies of the [primaries](#) and of the [general](#) election campaign – conducted under our own initiative, with no impetus or funding from the Commission or any other public body – was the sole effort to monitor station performance under that standard.

We have also found that our work has impact on industry practice. For example, a reporter at the Fox affiliate in Los Angeles told us that our [study](#) of the LA media market led to the station's decision to assign a correspondent to cover City Hall.

The proxy measures of the quality of news coverage that are usually employed in FCC-conducted and -commissioned studies of public interest performance -- such as total news programming time, ratings, and industry awards – cannot speak to crucial questions about editorial content. To learn that a station runs 5 hours of local news per day is not of the same value to the public discussion as to learn ([as we did](#)) that a typical half hour of coverage averaged 29 seconds of news about local and county government, including budget, law enforcement and legal issues, and education; or that stations in Los Angeles [devoted more time](#) to teasers and bumper music in a single night than they gave to the state's U.S. Senate race in an entire month; or that election coverage aired on Spanish-language stations is [significantly different](#) from election coverage aired on English-language stations.

The new data collection methods proposed by the FCC would dramatically increase the amount of empirical evidence of editorial coverage that is available, which will in turn

add an illuminating dimension to public discourse about news. The data that PIPAC proposes to have filed is not available elsewhere. It would be valuable to our research. If academics had access to this data in a single database at the FCC, they would be able to participate more effectively in FCC policy-making proceedings. The public benefits when researchers have access to this data.

Thank you for considering these comments as part of the rulemaking process.

Sincerely,



Martin Kaplan, Ph.D.
Associate Dean, Annenberg School of
Communication and Journalism
Director, Norman Lear Center
University of Southern California



Matthew Hale, Ph.D.
Associate Professor & MPA Director
Department of Political Science and
Public Affairs
Seton Hall University