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March 30, 2012

William T. Lake
Chief, Media Bureau
Federal Communications Commission
Washington, DC 20554

Via E-Mail

Dear Mr. Lake,

I received your letter requesting information in regards to MM Docket No. 00-168.

Kantar Media's Campaign Media Analysis Group is the leading media research company for politics, advocacy, and public affairs advertising targeting and expenditure data. Since 1996, CMAG's clients have included major national trade associations and interest groups, foundations and nonprofit groups, Fortune 100 companies, national media organizations, academic institutions, and hundreds of national, statewide and local political campaigns and parties.

Methodology

CMAG provides our clients with commercial occurrence and expenditure information, as well as PSA and promotion data, for more than 980 stations in all 210 U.S. media markets. Spot television is monitored 21 hours per day (5:00AM - 2:00AM) utilizing the MediaWatch Technology. The monitored stations are the principal stations in each market, typically including the network affiliates and major independents; Public Broadcasting Stations are not monitored. More than 80 national cable networks, 12 national networks (including West Coast feeds), and eight Spanish-language networks also are monitored. The MediaWatch technology provides information on show, station, network affiliation, and time aired for every commercial spot captured.

In addition, CMAG employs a descriptive naming convention for classification of television creatives. Each TV creative receives a unique title based on several factors including, but not limited to the campaign, state, and issues presented within the commercial. In addition to the creative title, each classified ad is tagged with a number of identifying attributes relating to the content of the ad. These attributes include:

- Ad Type
- Party Affiliation
- Election
- Level
- Year
- Issues
- Race

- State
- Tone (i.e., positive or negative, if applicable)

Political Ads Aired on Network Affiliates and in Top 50 Markets

Using our extensive archive of political advertising, we are able to provide the data you requested for the 2008, 2010, and 2012 election cycles on 1) the percentage of broadcast TV advertising dollars spent on affiliates of ABC, CBS, NBC, and FOX in the country as a whole, and 2) in the top 50 media markets.

The data below include ads that CMAG defines as “election” ads in federal races for the Presidency, the US Senate and the US House of Representatives. This definition may or may not correspond to the FCC’s or the Federal Election Commission’s definition of “political” for regulatory, pricing, or disclosure purposes. The data were calculated using CMAG’s spending estimates, which are not always an exact depiction of the actual spend (because of fluctuating rates paid by advertisers), but which are highly accurate as a proxy allowing for aggregation and the figuring of ratios and percentages.

Our data show that during the 2008 election cycle, in the United States as a whole, 94 percent of political TV advertising dollars were spent on affiliates of the four largest national networks.

Looking just at the top 50 markets in 2008, 92 percent of advertising dollars were spent on affiliates of the four largest national networks.

During the 2010 election cycle, in the United States as a whole, 94 percent of political TV advertising dollars were spent on affiliates of the four largest national networks.

Looking just at the top 50 markets in 2010, 92 percent of advertising dollars were spent on affiliates of the four largest national networks.

To date in the 2012 election cycle, in the United States as a whole, 96 percent of political TV advertising dollars have been spent on affiliates of the four largest national networks.

Looking just at the top 50 markets for the 2012 cycle thus far, 94 percent of advertising dollars have been spent on affiliates of the four largest national networks.

Thank you for your inquiry.

Sincerely,

Kenneth M. Goldstein
President, Kantar Media Campaign Media Analysis Group