HOWARD UNIVERSITY

School of Communications
525 Bryant Street, NW,
Washington, DC, 20059, USA
Tel: 202-806-4226

TO: Acting Chairwoman Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai

RE: FCC Docket 12-30, Critical Information Needs Research Design

DATE: July 22, 2013

Section 257 of the Communications Act of 1934, as amended, requires that the Federal Communications Commission review and report to Congress on:

(1) regulations prescribed to eliminate market entry barriers for entrepreneurs and other small businesses in the provision and ownership of telecommunications and information services or in the provision of parts or services to providers of those services and that can be prescribed consistent with the public interest, convenience and necessity; and
(2) proposals to eliminate statutory barriers to market entry by those entities, consistent with the public interest, convenience, and necessity.

Pursuant to this mandate, the Federal Communications Commission's Office of Communications Business Opportunities (OCBO) announced the release of the "Research Design for the Multi-Market Study of Critical Information Needs," hereafter "Research Design" and invited public comment. We write to comment on this Research Design, within the context of our roles as researchers at Howard University, a historically Black institution with a mission to address educational and social issues among African Americans and other under-served populations..

Our comments are offered with the knowledge that the Literature Review conducted by those at University of Southern California, in Spring 2012, makes several relevant observations, including that:

(1) There are clear and significant information needs of Americans at the individual and community level;
(2) The available research indicates that many of those needs are not being met;
(3) The access to information, as well as the tools and skills needed to navigate information, are essential to civic and democratic participation; and

(4) Low-income, minority, and marginalized communities and “lower-information” areas are likely to be systematically disadvantaged in both personal and community opportunities when information needs lag or go unmet.

On the whole, we believe that the Research Design moves in the right direction by seeking to assess “critical” informational needs of diverse communities. However, we believe that there are several aspects of the design that will not yield the desired results with the presently identified definitions and procedures. Please consider the following suggestions as refinements.

A. Definition of “Critical Information Needs”:

We note at the outset that the concept of CINs should include content that has historically (logically) come through particular genres of broadcast programming, namely news, public affairs, public service messages and the "public" file of information about the station. Knowing who owns a station, who is operating the station and what non- profit organizations they give support to are part of the "critical information needs of a community." The last of these empowers listeners to be engaged responsibly with the stations, which are mandated by statute to serve the public interest. As yet, we have not found radio stations to post their public files for inspection online. We see the requirement for television but what about radio? We reflect on Lawrence Redd’s (1991) article "Radio Deregulation: The Impact on Black Families and Nonprofit Social Agencies" as to how a change in the law lifting the need for broadcasters to air PSA and other non-entertainment programming began to diminish vital local support service information within African American communities. ***We urge the FCC to take this and other empirical research into consideration in order to assure that the concept “critical information needs” will be operationalized to include these important formats in any studies that may be funded by the Commission.***

B. Sampling of Radio Stations: (p. 8)

The Research Design specifies that “we plan to only sample from radio stations that potentially provide for CINs (i.e., news content). This includes news and talk radio stations.”

We believe that the study should include both commercial and non commercial stations, including those carrying public(NPR) programming. The minimum power requirement for a station should be 100 Watts (the Corporation for Public Broadcasting minimum requirement for funding). We note that a 100- watt non-commercial station was the primary information provider during the aftermath of Hurricane Katrina. This station (WQRZ) was one of four that survived the devastation and the FCC allowed the owner to increase the transmitter power in the region for ten days. Many commercial radio stations abandoned their posts during the storm or were absent because the station was assumedly automated with voice tracking

(http://www.prometheusradio.org/node/2578). These days it is a question as to which stations are really providing news. In addition, not everyone listens to the niche "news formatted" stations, and it is also unlikely that any female or minority owns such a (news) station given the well-established fact that conglomerates own the majority of news formatted stations.

We believe that limiting the selection of stations as presently stated in the Research Design is very problematic in that it would omit the full population of (broadcast) radio stations from responsibility for providing critical information needs to the communities they are licensed to serve. Not only does this sampling plan violate both the spirit and statutory requirement of broadcast stations to serve the public interest, but it will bias the sample by arbitrarily limiting the population before the sample is drawn. We wish to bring to light the commonly known fact that conglomeration in the industry has resulted in local content being replaced by homogenized content, typically transmitted from centralized (distant) locations. There is documented proof that this has already been a problem when emergencies (weather, toxic spills, etc.) occur. The proposed study design should be viewed as a mechanism for documenting the extent of this problem so that solutions aimed at radio stations truly providing critical information needs to communities in a timely way can arise. ***Therefore, we argue in favor of sampling a more inclusive selection of radio stations, both entertainment and talk/news formats.***

C. Content analysis of radio stations – general comment.

It will be important for this study to compare station content along the lines of race, ethnicity and gender in ownership. In other words, do women-owned stations provide different information relative to critical information needs than those with majority male ownership? Do stations with minority ownership provide different content relative to critical information needs than those with majority White ownership? This is a critical point of inquiry which we believe is not fully appreciated in the Research Design. ***Therefore, we argue in favor of (1) specifically allocating a series of inquiries regarding this, and (2) operationalization that fully captures diversity of ownership in terms of race and gender.***

D. Community Ecology Study (pp. 14-20).

As presently described, the analysis of community needs among residents of diverse communities is not likely to elicit the full participation of those in minority communities. This phase of the research design identifies two stages of data gathering. Stage one features a multi-stage sampling strategy "for targeting individuals from diverse neighborhoods for in-depth interviews" (p. 14, bottom). It would use Census data to establish geographic boundaries, and would then drill down to obtain socio-economic details by census tract to determine exactly which neighborhoods to sample. The procedures then call for obtaining contact information for

a random sample of individuals from each neighborhood, for a total of 504 interviews. Stage two calls for a more general population survey based on information gleaned during stage one. The sampling strategy identified with this survey in stage two is based on complex multi-layered modeling in the six cities to be selected for inclusion in the study.

As researchers who conduct research in diverse racial and ethnic communities, we question the wisdom of this approach, which does not reflect an understanding of how information is best obtained within non-White communities. ***If the research is to produce useful, reliable data, the study design should take a more ethnographic approach (with clear purposive sampling), incorporating the involvement of community leaders and organizations in African American, Latino/Hispanic, Asian and varied recent immigrant groups.***

Stage one should also recognize that gender is an important variable when determining information needs and assure in-depth interviews with both male and female leaders of relevant community organizations (which may include ethnic churches in respective communities), and with male and female residents in equal numbers in the broader community. Stage two might best be accomplished with the assistance of those leaders in the populations targeted to mobilize participation in the study; we recommend this approach in addition to any more general outreach for participants in minority communities that researchers choose to make. Again, we emphasize the importance of qualitatively working through the structures of the communities in question, rather than imposing a sterile, abstract random sample method onto communities with diverse racial and ethnic populations.

E. Relationship of content analysis to community surveys.

It is unclear to us how the content analysis aspect of the study is to be aligned with or otherwise related to the Community Ecology Study. We see this limitation primarily because the proposed content analysis stays at the level of the general public in the U.S. While this is an important area of inquiry (therefore, to be recommended), explicit links between specific communities' needs and media content are not established in the research design. ***Therefore, we argue in favor of formulating content analyses that will give rise to explicit questions regarding specific communities' needs and concerns.***

F. Researchers who will conduct these various studies

It is unclear from the Research Design document how the research is to be conducted. The scope and complexity of the studies defined suggest there is too much work for a single team to carry out. ***We suggest breaking out the content analysis aspect of research into one study, under the purview of a single Principal Investigator (and perhaps subcontractors). The Community***

Ecology study, which should call for a qualitative methodological approach, could also be conducted by a single Principal Investigator. However, the complexity of conducting such research suggests multiple individuals with specific knowledge of the communities identified for sampling. All contracts for research should be decided on a competitive basis.

Respectfully submitted,

Members of the Howard Media Group:
Carolyn M. Byerly, Ph.D.
Aitza M. Haddad, J.D., LL.M.
Yong Park, Ph.D.
Reginald D. Miles, M.A.
Clint C. Wilson, II, Ed.D.