

STATEMENT OF DR. MARK N. COOPER
TO THE
LOCALISM HEARING
FEDERAL COMMUNICATIONS COMMISSION
OCTOBER 31, 2007

The broadcast localism initiative, launched in mid-2003, was an important landmark in FCC media ownership policy. Under its auspices, the public filed comments and came to public hearings such as this. For a couple of years the Media Bureau began to develop a firm theoretical framework for explaining why more than simple economics is needed to promote localism, to explore a rich, multi-faceted definition of localism and to conduct research into how localism could be evaluated.

These efforts seem to have been abandoned just prior to the issuance of the Further Notice of Proposed Rulemaking. The broadcast localism initiative announced with such fanfare to “play a critical role in gathering empirical data and grass roots information on localism” seems to have disappeared. It was supposed to inform the commission’s thinking about media policy. Its findings should be presented to the public and the Commission for independent review and consideration, not submerged in thousands of footnotes in a final order.

If the Commission were to give the broadcast localism initiative its due, it would find that the challenges to localism are great and relaxing ownership limits will make it harder to achieve the goal of a broadcast media that is truly responsive to local needs.

Here is what the broadcast localism initiative was telling us before it seems to have disappeared.

It identified half a dozen specific economic, social and political factors that indicate market forces alone will not produce adequate localism in the broadcast media to meet society’s needs.

The Media Bureau identified three broad areas of concern about localism -- Coverage of local affairs, sensitivity to local tastes, and opportunity for local involvement. The notice of inquiry in the Broadcast localism initiative had nine major areas of concern. Communications with Communities, Nature and Amount of Community Responsive Programming, Political Programming, Underserved Audiences, Disaster Warnings, Network Affiliation Rules, Payola and Sponsorship Identification, Voice Tracking and National Playlists. Combining the Media Bureau analysis and the Notice of Inquiry issues, we find two almost two dozen specific localism issues in four broad categories.

The list is worth reading, since the recent research studies commissioned by the FCC seem to be unaware of this important foundational work for studying localism.

Under Coverage of local affairs we find

Community news
(police, traffic, weather, sports)
Emergencies & events
Education about local institutions
Local religious affairs
Local advertising
PSAs in the public interest

Under Sensitivity to Local tastes we find

What listeners want
Avoid offence
Tailoring to local taste

Under Opportunity for local involvement we find

Local ownership/control
Use of local resources
Working in industry
Locally originated programming
Outlet for local talent

Under Facilitation of local political discourse we find

Public affairs
Expression of group interests
Community, political,
religious group discussions
Local political view
Local call-in and talk
Public access
Editorializing

Each of these issues must be considered both from the localism point of view and the point of view of underserved groups. Thus, a parallel set of minority concerns would cover the same issues as identified for localism, but focused on minorities, for example, is there

- minority targeted programming, and
- minority originated programming,
- that is sensitive to local minority tastes, and
- provides opportunities for minority employment in the media,
- minority ownership and control of outlets
- use of minority talent,
- minority group expression, and
- minority issued fairly presented in the media.

Almost none of these issues were addressed in the recent research studies. The Commission has not issued a report on localism or diversity. Until the Commission provides a detailed analysis of the impact of ownership limits on localism, it should not issue a final rule. Simply rolling it all into one humungous order will do a disservice to the good, hard work that went into the localism initiative and put us back at square one, with an order that does not reflect the policy goals of promoting localism and diversity in the media.