



UNITED STATES GOVERNMENT

# memorandum

DATE: April 28, 2016

TO: Octavian Carare

FROM: William T. Lake  
Chief, Media Bureau  
Federal Communications Commission

SUBJECT: Peer Review of Hispanic Television Study

The Hispanic Television Study provides a quantitative examination of the effect of Hispanic ownership on programming shown by broadcast stations and on Hispanic viewing habits. The study explores the nexus between ownership, programming, and viewing to expand the discussion and understanding of these interrelationships. Further, the study examines the effect of Hispanic ownership on a station's programming decisions and consequently on its popularity among the Hispanic TV audience. To conduct this study, we constructed a unique dataset, including improved minority ownership statistics from the Federal Communication Commission's ("Commission's") Form 323 data collection effort, and using both descriptive statistics and regression techniques we examine how Hispanic ownership is correlated with what viewers are offered and what they watch.

Under the Information Improvement Act, OMB requires that influential scientific assessments be subject to peer review to enhance the quality and credibility of the government's scientific information.<sup>1</sup> I ask that you do such a peer review of the study described above. OMB guidance further suggests that Federal Agencies provide peer reviewers with "instructions regarding the objective of the peer review and the specific advice sought."<sup>2</sup> In performing this peer review, we ask that you evaluate and comment on the theoretical and empirical merit of the information. You should consider, among other things: (1) whether the methodology and assumptions employed are reasonable and technically correct; (2) whether the methodology and assumptions are consistent with accepted economic theory and econometric practices; (3) whether the data used are reasonable and of sufficient quality for purposes of the analysis; and (4) whether the conclusions, if any, follow from the analysis. Please note that the standards for evaluation are not necessarily the same as those one might apply in evaluating studies for publication in a professional

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<sup>1</sup> See *OMB Peer Review Bulletin*, 70 Fed. Reg. 2664 (2005) ("OMB Bulletin").

<sup>2</sup> See *OMB Bulletin*, 70 Fed. Reg. 2668.

journal. For example, it is not necessary that the study present new or novel theoretical results or empirical techniques. Consistent with the requirements of the OMB Bulletin, we are not asking you to “provide advice on policy” or to evaluate the policy implications of the study.<sup>3</sup>

Further, you should be aware that the peer review will not be anonymous. Rather, you will be identified and your review will be placed in the public record.

Finally, the OMB Bulletin requires us to assess whether potential peer reviewers have any potential conflicts of interest.<sup>4</sup> Please confirm that you have submitted your 2016 OGE Form 450, Confidential Financial Disclosure Report.

I ask that you provide a written report of your review, findings, and recommendations with regard to this influential scientific information by **May 5, 2016**.

Thank you for your assistance in this matter.

Attachment

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<sup>3</sup> The OMB Bulletin states in relevant part: “Peer reviewers can make an important contribution by distinguishing scientific facts from professional judgments. Furthermore, where appropriate, reviewers should be asked to provide advice on the reasonableness of judgments made from the scientific evidence. However, the charge should make clear that the reviewers are not to provide advice on the policy....” *OMB Bulletin*, 70 Fed. Reg. at 2669.

<sup>4</sup> The OMB Bulletin considers a conflict of interest to be “any financial or other interest” which could include investments, consulting arrangements, grants or contracts that “could impair the individual’s objectivity or could create an unfair competitive advantage for a person or organization.” *OMB Bulletin*, 70 Fed. Reg at 2670.