

Review of: "Traditional Outlets Still Dominate Local News and Information," by Mark Cooper

Reviewer: Steve Wildman, Michigan State University

During the research and evaluation phase leading up to its 2003 Report and Order on Media Ownership, the FCC commissioned Nielsen Media Research to conduct a survey of citizens' media use habits. The findings of this survey were reflected in the weights the Commission applied to different media in the controversial diversity index proposed in the order that was subsequently remanded to the Commission for reconsideration by the Third Circuit Court of Appeals in June 2004. In this paper, Dr. Cooper presents findings from two surveys designed by The Consumer Federation of American and Consumers Union (CFACU) and administered by Opinion Research Corporation in 2003-2004 and in 2006. The findings of these surveys are compared to findings from surveys conducted by other parties dating back over a decade to demonstrate that the responses to the CFACU surveys were consistent with those generated by surveys conducted by other researchers.

The claimed motive for the CFACU surveys was to address various flaws and omissions that CFACU sees as limiting the usefulness of the FCC's Nielsen survey for crafting a local media ownership policy. This review of Dr. Cooper's paper asks two broad questions: (1) whether the original FCC-Nielsen methodology is as badly flawed as claimed by Dr. Cooper, and (2) whether the findings from the CFACU surveys reported in this paper constitute evidence deserving serious consideration as the Commission revisits its media ownership policies once again. To briefly preview my conclusions, I believe Dr. Cooper overstates the case for dismissing the findings of the Nielsen survey, but I also think the findings of the CFACU surveys discussed in this paper constitute a valuable addition to the evidence available to the Commission.

Dr. Cooper offers two principal criticisms of the Nielsen survey. (1) That it does not adequately distinguish between alternative media as sources for news and information related to national versus local affairs. (2) That it fails to distinguish between the importance media consumers attach to different media as sources of information on national and local affairs and the frequency with they acquire information on national and local affairs from different media. He also faults the Nielsen survey for not including questions that directly address the possibility that online sources of news and information utilized by media consumers were operations maintained by outlets for traditional media in local markets, such as a local newspapers' and TV stations' websites. There is merit in all three criticisms. However, as the third criticism is the principal topic addressed in a separate paper submitted to the Commission by Dr. Cooper and CFACU survey results addressing internet-related issues are only briefly (and incompletely) summarized in this paper, this review focuses on the analysis related to the first two criticisms of the Nielsen survey and their use by the FCC.

The first two criticisms focus on two questions included in the Nielsen survey addressing the use of different media as sources of information on local and national issues: "What

single source do you use most often for local or national news and current affairs?” and “What sources, if any, have you used in the past 7 days for local news and current affairs?” As follow up to the second question, respondents were also asked if they used specific media (listed by name) that were not among those they named on the basis of unaided recall. The responses to the original question and the follow up questions were then combined.

Given the historic importance of localism as a goal for U.S. communications policy, the possibility that some media may be important sources of local news and information and others contribute more to media consumers’ knowledge of national affairs should be taken seriously in any assessment of the policy implications of local media ownership structure. Presumably concentration of sources for either type of news and information individually would be a matter of concern. However, both types of news and information are combined in the first Nielsen question. While concentration of media sources for both types of information combined may be a legitimate concern for policy makers, a more conservative approach would deal with each type of information separately. On the other hand, because the second Nielsen question focuses specifically on “local news and current affairs,” it is really only concentration of sources of national news and information that is not explicitly addressed on its own by the Nielsen questions.

Furthermore, as Dr. Cooper points out, because the first, broad media question and the second that dealt explicitly with local media called for very different types of answers, it is not possible to tell from the answers to the Nielsen survey the extent to which respondents were able to clearly distinguish among sources for national and local news and information. This ambiguity was reflected in the Commission’s decision not to include cable television in its diversity index because other evidence suggested that at least some respondents were not able to faithfully distinguish between cable networks providing national news and the local broadcast stations carried by cable systems that were the actual sources of most televised coverage of local affairs. The approach in the first of the two CFACU surveys of asking two questions with parallel wording, one focused on sources of national news and the other on sources of local news and information, is thus an improvement on the questions employed in the FCC’s Nielsen survey. The substantially different patterns of responses to the CFACU national and local media use questions show that at least a substantial portion of survey respondents can distinguish among different media, including network and local television, as sources of national news and information as opposed to local news and information. On the other hand, the fact that six percent of respondents to the CFACU 2004 survey listed Cable TV as their most important source of local news suggests that some CFACU respondents may not have been fully aware of the sources for different types of televised news.

Dr. Cooper criticizes the second Nielsen question regarding media used for local news as being weak for asking only about media used during the last 7 days and for belittling the importance of the question by including the words “if any.” The merit of the weakness complaint is not *prima facie* obvious. Nor is it supported by reference to accepted standards of good practice in survey methodology. Differences between diary and people meter measures of television audiences have shown that memory is often a highly inaccurate gauge of actual media use. Memory presumably also becomes an increasingly poor index of actual media use the longer the period to which it is applied. Thus

restricting responses to media used during the prior seven days conceivably could provide a more reliable measure of actual use than simply asking people to state which media sources they turn to most often. Thus I am not convinced by the claim that the CFACU question regarding frequency of use of different media as sources for local news and information is superior to the local media question in the FCC's Nielsen survey. Similarly, lacking any supporting citations to standards of good practice in survey design, I find no reason to accept the implied claim that responses to the Nielsen question about sources for local news and information might have been influenced by inclusion of the words "if any," while the inclusion of this qualifier conceivably could have served the purpose of assuring respondents that a null response to an open ended question was acceptable.

Dr. Cooper is also critical of the FCC for listing and weighting equally all media identified in response to the second Nielsen question and the follow up inquiries about media not remembered through unaided recall because "[t]his approach was certain to overweight the less prevalent and important sources by asking many more people about those sources a second time with a prompted question." Ignored is the possibility that this question was intended to elicit information reflecting on something other than frequency of use or importance as defined by CFACU (contributing most to the formation of a respondent's opinion about local/national issues). A historically important concern in the debate over ownership policy is the number of distinct media sources citizens turn to in seeking information and opinions. The inclusive approach of combining responses to the open-ended question with those prompted by the follow up questions would seem to generate evidence responsive to this historic concern, and certainly more responsive than the data gathered through the CFACU survey. The CFACU surveys asked respondents to list their most frequently used and second most frequently used media and CFACU then summed these responses to get a somewhat misleadingly labeled total use measure. But unless the vast majority of media consumers utilize no more than two media in their efforts to acquire news and information, the CFACU total use measure is likely to be a poor index of the number of sources media consumers actually turn to.

The CFACU decision to include separate questions in their surveys about the frequency with which different media are used and their importance to opinion formation does address a significant oversight in the design of the FCC's Nielsen survey. If some media contribute more to the formation of opinion on national and/or local affairs, policy should be more concerned with concentration in the ownership of outlets for those media that are most influential. CFACU frequency of use ratings are highly correlated with their importance ratings, which raises the question of whether survey respondents simply listed as most important those media they used most. However, CFACU also use data from their 2006 survey to show that at the individual level respondents often listed different media as most important and most frequently used as sources for different types of news. Thus, for example, they found that 64 percent of respondents listing national TV as their most frequently used source for information on national issues also listed it as their most important source. For magazines, the corresponding figures were two percent and 33 percent. It is important to know that many respondents were not treating importance and

frequency as proxies for each other, but this does not mean that substantial numbers did not equate frequency with importance. Greater clarity in this regard might have been provided had respondents been asked why they viewed some media as more important sources of news and information than others. Nevertheless, CFACU has made an important contribution by asking separate questions about frequency of use and importance of different media.