

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

Future of Media & Information Needs of Communities

Testimony of Jonathan Blake on behalf of
Barrington Broadcasting Group LLC, Belo Corp.,
The Dispatch Printing Company, Gannett Co., Inc.,
Hearst Television Inc., Post-Newsweek Stations, Inc.,
and Raycom Media, Inc.

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Phoenix, Arizona

My name is Jonathan Blake, and I represent here today a group of broadcasters that operate strong television stations in small, medium and large markets across the country. Like many other television broadcasters, they are committed to serving the “information needs of communities.” They accept the responsibility to do so and are willing to provide reasonable and meaningful information to the public about how they implement this responsibility. They include Barrington Broadcasting Group LLC, Belo Corp., The Dispatch Printing Company, Gannett Co., Inc., Hearst Television Inc., Post-Newsweek Stations, Inc., and Raycom Media, Inc.

First a few general comments.

1. These broadcasters believe that the Report furthers the cause of good local journalism and good local television service to the American public. They commend the Commission for undertaking this study, which recognizes that before recommending changes for the future, it is desirable to understand the present. This Report took that step with a commendable seriousness of purpose, broad and in-depth research, and a fresh look at the issues in a manner that was fair, open-minded and without preconceived conclusions. The Report makes a very valuable and probably unprecedented contribution in that respect alone.

2. The Report also recognizes that local television stations are a vitally important ingredient in the coverage of local news. The American viewing public recognizes the value of local television journalism. Poll after poll and analysis after analysis of the public’s news habits and preferences show that local television stations are the principal source of local news that the public relies on. The recent series of

natural disasters has once again dramatically demonstrated the importance of local broadcast coverage.

3. Similarly, there is a growing realization, reflected in the Report, that the Internet and the new media, while providing valuable new, competitive and complementary news services, are, by and large, not playing the same core local journalism role as local television stations and are unlikely to do so in the foreseeable future. Moreover, the leading local news sites on the Internet are often produced by local television stations and local newspapers.

4. The Report is also faithful to the imperative that the government avoid content regulation. It prefers public disclosure to inflexible, across-the-board programming requirements. We agree that this approach best serves the public.

5. In addition, the Report understands that different broadcast stations operate in different market circumstances, as do local newspapers and other local media. Like newspapers, they serve the public in different ways and should not be subjected to a one-size-fits-all regulatory straitjacket imposed by the federal government.

6. And finally, the Report sees an even stronger, more important and more innovative role for local television journalism and other local station services in the future. The broadcasters I represent today embrace that conclusion with enthusiasm and commitment.

Second, the Report makes three key recommendations with respect to local television stations: (1) on-line disclosure proposals, (2) pay-for-play, video news releases and sponsorship identification issues and (3) greater use by the federal

government of local media (television, newspapers and Internet sites) for its ad buys. All three recommendations will serve the public interest. The first two will require rulemaking proceedings to implement, of course. But, as the Report recognizes, the FCC's rulemaking process will focus on important specifics, non-obvious implementation issues and the need for an approach that adapts to various circumstances and practicalities.

Online disclosure proposals:

With respect to the Report's online disclosure proposals, a key step on the path toward implementing them will come at the rulemaking stage. Disclosure requirements should seek information that is meaningful and accessible, they should involve simple and clear metrics, they should provide opportunities for stations to describe services beneficial to their communities that fall outside the categories prescribed by the disclosure requirements, and they should avoid undue complexity and undue burden. Specific rule provisions should also take into account the realities of broadcast operations, particularly station news and recordkeeping practices. Toward that end, these broadcasters and (in all likelihood) others would be willing to make available to the Commission the newsroom and recordkeeping staff at their stations.

- The Report recommends that stations be required to prepare a web-based form for each day of a composite or sample week. The proposal to use a composite or sample week is a good one. These concepts have triggered some implementation issues in the past, and the rulemaking should take these past experiences into account. Again, we'd be pleased to help.

- The Report recommends that the disclosure requirement focus on program segments “about the local community.” The Report’s recommendation that the online form provide information about this single program category is desirable in order to limit the burden and keep things simple and meaningful.
- Requiring that stations catalogue programming by additional program categories and over longer periods of time would multiply the burdens, lead to potential confusion among the program categories¹ and expand the government’s intrusion into licensees’ programming discretion. Over the course of an eight-year license period, such record-preparation obligations could lead to a substantial drain on station resources, without benefitting the public. And, the burden would be greatest on stations that do the most programming in these categories.
- However, use of a single programming category may also blot out recognition of many other valuable services (such as emergency warnings) that stations provide on a scheduled and unscheduled basis. Accordingly and properly, the Report recommends that stations be given the opportunity to go beyond any disclosure form adopted by the FCC to describe other beneficial services they provide to the communities they serve.

¹ In this vein, the Report (at 291) points out that the FCC’s 2008 Enhanced Disclosure Order “required broadcasters to list detailed information about ‘local civic affairs’ as distinct from programming about ‘local electoral affairs,’ not to be confused with general ‘local news.’”

- The Report proposes that posting these reports on an Internet site -- the station's or the FCC's -- would be part of a shift of stations' local public files to the Internet. That makes sense to us.

Pay-for play, video news releases and sponsorship identification:

Another set of recommendations in the Report addresses pay-for-play practices, video news releases and the FCC's existing sponsorship identification requirements. We don't believe that broadcasting third-party content, especially VNRs, is necessarily undesirable, let alone improper. But, it is desirable for the public to know when particular broadcast content has been provided by a third party.

Greater use by the federal government of local media for its ad buys:

This proposal recognizes that local media advertising offers federal agencies valuable benefits, including greater flexibility and cost-efficiency. Increased federal advertising at the local level will also help support investments by stations and other local media in quality programming, but, most importantly, it makes commercial sense for U.S. government advertisers. National businesses, national non-profit organizations and state government take advantage of these benefits. The federal government should do so as well.

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I look forward to open discussion of these matters.