Politics, Policy, Content & Media Consolidation

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Introduction

The consolidation of local television stations in the United States has reached epic proportions. However, the general public does not even know it. Yet, the actions are being played out, literally, in their backyards.

One justification for this consolidation is that in order to meet the increased competition for viewers from cable and the Internet, broadcasters must get bigger and more efficient. Some broadcasters will argue that consolidation will help relieve some of the economic burdens that are shouldered by local stations in gathering and presenting news content. However, the implementation of this consolidation and these service agreements, whether they involve sharing news-gathering resources or overall management of the station, has implications for the critical information needs of the local communities.

TV broadcast consolidation has taken two forms. The first has been the outright purchase of stations in the same market by one owner. And that activity increased exponentially since 2012 when only 95 stations were sold for a total of $1.9 billion. In 2013 that number increased over 300 percent (290 stations) at over four times the dollar value ($8.8 billion). According to the Federal Communications Commission (FCC), between 1996 and 2010 there was a fifteen percent increase in the number commercial television stations in the U.S. and a thirty-three percent decrease in the number of owners of those stations.¹

The other form of consolidation that occurred was the implementation of service agreements among stations in the same market. The FCC also reported that there were 175 television station duopolies, which include owners with “attributable local marketing agreements” in the 210 television markets in the U.S.² These agreements are arrangements among stations in the same television market in which they share newsgathering resources, video, and/or marketing and management activities. They take several forms. Local News Sharing agreements (LNS) involve multiple stations which pool and share journalists, editors, equipment and content. In Joint Sales Agreements (JSA), a licensed station sells some or all of its advertising time to another station in return for a fee or a percentage of the revenues. A Local Marketing
Agreement (LMA) occurs when the owners of one station take over the operation of another station including programming and advertising. In a Shared Services Agreement (SSA), the stations combine newsrooms assets and personnel and share facilities and administrative functions. As of June 2015, 28 percent of local television stations in the U.S. reported being involved in a service agreement.

This consolidation is acute among the affiliates of the four networks (ABC, CBS, NBC & Fox). These are the stations on which the overwhelming majority of local news is presented. In the top 100 television markets, which contain 86% of all U.S. TV households, eighteen companies control over three-quarters of these stations. Put more starkly, five companies own almost one-third of the 1,400 local television stations in the U.S. Further, one in four local stations does not produce the news content that it presents, a drop of eight percent since 2005 (Papper, 2013). The pace of consolidation led Nextar Broadcasting Group President Perry Sook to predict the landscape of future of local television ownership in bold terms:

I would think that within two to five years, you’ll see the emergence of what I call three or four super-groups. Those companies will continue to drive the business, while those that are sub-scale will choose [to sell and] not to be a house by the side of the road as the parade passes by.

In fact, Sook has taken his warning to heart. In January 2016 he led Nextar in a merger with Media General in which Nextar would control 171 full power television stations in 100 television markets (there are 210 television markets in the U.S., as defined by Nielsen Research). The merger made Nextar the largest station group in the country. But, Nextar also assumed $4.6 billion in debt.

Since 2011, Sinclair Broadcasting Group, Inc. (SBG) has spent nearly $2 billion to acquire stations across the country and it now controls 134 stations in 69 markets and reaches one-third of the television households in the U.S. But, this may be only the tip of the merger and acquisitions iceberg. The era of station “super-groups” may be approaching. However, the only way for these super-groups to emerge is the assumption of significant debt and that will put even more pressure on the stations to achieve economies of scale.
Although SSA’s date as far back as 2000, in the midst of national economic instability, increasing numbers of local television news stations signed these agreements. As of 2015, SSA’s are operative in 94 of the 210 television markets in the U.S., an increase from 55 in 2011.

The service agreements among stations were subject to relatively little oversight by the FCC—partly because the agency did not even have an accurate accounting of where they were operating. The media industry’s position regarding these agreements was that they did not violate the ownership restrictions because there was no transfer of license from the brokered station to the brokering station. The FCC tacitly agreed with that position until March 31, 2014. In some respects, the FCC’s about-face was a response to an ex parte brief the U.S. Department of Justice (DOJ) filed with the FCC making its position clear that “sharing” agreements “often confer influence or control of one broadcast competitor over another. FCC Chairman Tom Wheeler called the agreements a “legal fiction”. Failure to account for the effects of such arrangements can create opportunities to circumvent FCC ownership limits and the goals those limits were intended to advance”.

This research was directed at answering the crucial questions that the Federal Communications Commission and the Department of Justice raised regarding these service arrangements. Specifically, we examined the impact that service agreements had on the content of local news in eight markets where such agreements exist. In so doing, we provide a prism through which the FCC can determine the extent to which these arrangements comply with serving the public interest. Do the stations in these arrangements function as separate entities? What effect, if any, do these agreements have on the content of news? Do the stations achieve economies of scale? If so, how? What might this mean for the public interest?

The Role of the Researcher in the Policy Process

The support for the research project whose findings are reported here was always in doubt. And it is important to indicate the conditions within which this research was organized, conducted and reported to the policy arena.

Every four years, the Federal Communications Commission (FCC) is required by law to conduct a review of media ownership in the United
States, the Quadrennial Review. It has always been a contested space. On the one hand, the media industry claims that regulation is burdensome, unnecessary and, most importantly, disruptive of market mechanisms that should dictate how the media are organized. On the other hand, media reformers argue that a reliance only on the market to produce information has resulted in its treatment as a commodity to the detriment of the public interest. As we see from the information presented previously in this paper, there is much money at stake. Such was the environment within which this research was conceived. The media firms argued that there was no research that examined the relationship between ownership and broadcast content. And, further, they claimed, ownership and content were not related. They were right on the first point, but the second point was amenable to scientific examination. That is what this project accomplished.

Initially, the policy researcher met with an FCC Commissioner regarding the need for and the nature of the research. Although he agreed regarding the importance of the research, the politics at the time could not support the endeavor. Indeed, the FCC was engulfed in the debate over net neutrality and there was no political capital to address broadcast issues. Secondly, the FCC Chairman was disinclined to push the issue. However, I (and media reformers) had continuing discussions with the FCC. For the 2010 Quadrennial Review the FCC issued a call for eleven pieces of research to help inform media ownership policy. The most important of those studies was to focus on market structure—precisely the research that I and others had urged the FCC to conduct, in meetings and in the conference call in which the FCC requested that I participate. However, within one month of the issuance of the request for proposal, the market structure study was cancelled without explanation. It was the only one of the eleven studies to meet that fate.

The market structure study was at the heart of the media ownership issue because the FCC’s decisions have their most crucial effect in local television markets. Therefore, the cancellation of the study would deal a blow to the entire review process. From a public policy perspective, that situation could not stand. Therefore, without the FCC’s support, I generated funding from several sources, including the Communications Workers of America and the University of Delaware.

The findings of this research were used by many parties including Free Press, the Georgetown University Law Center, among others to inform
their positions on media consolidation. Further, I made presentations in Washington, DC to media forums, to policy makers on Capitol Hill and had meetings with FCC Commissioners and staff to present the findings.

These were crucially important steps because without this research the FCC, by its own admission, would not have taken the landmark decision in March 2014 in which it declared that it would no longer approve joint sales agreements (JSAs) if the agreement calls for stations to share more than 15% of ad sales revenue. Joint sales agreements are contracts between two stations where one station sells some or all of its advertising time to another station in exchange for a portion of the ad sales revenue. The JSA ruling was the first time the FCC directly addressed the effect that service agreements have on local media landscapes and the media environment in the United States, generally. The Commission specifically identified 15% as the maximum shared proportion of ad sales revenue as the ceiling because it considered any exchange beyond that point as one station exercising corporate control over the other. The FCC considered this consolidation in conflict with the public interest. The ruling did not automatically “grandfather in” pre-existing JSA arrangements.

The JSA ruling, particularly the restrictions on grandfathering extant JSAs, became the subject of significant and vociferous political and legal debate as the FCC has been sued by various entities, including the National Association of Broadcasters (NAB). On the political level, the U.S. Congress passed a rider to the massive appropriations bill in December 2015 that provided a ten-year grandfather period for the JSA arrangements that existed before the ruling was implemented. At the legal level, the most important event occurred on May 25, 2016 when the Third Circuit Court of Appeals in Philadelphia vacated the rule and remanded it back to the FCC. However, in August 2016, the FCC adopted an order, that reinstated the JSA attribution rule. The vote was 3-2 with the Democrats voting in favor of the rule and the Republicans opposing it.

The Importance of Local TV News
Television news remains the critical news source of information for the American public about their localities. Even in the age of the Internet, almost eight of ten Americans get their news from a local television station. The Pew Research Journalism Project found that almost three-
fourths (71%) of U.S. adults view local TV news over the course of a month.¹¹ That compared to 65 percent and 38 percent for network news and cable news, respectively. To be sure, Pew also found that cable news viewers spent about twice as much time as local TV news viewers consuming news (25.3 vs 12.3 minutes per day, respectively). However, they made a distinction between heavy, medium and light news viewers. And, heavy news viewers regularly consume news across all three platforms.¹² Moreover, even as engagement with news media is in decline (except for digital/mobile), almost half of the public (48%) indicated they regularly watched local TV news, more than all other media.¹³ Even across different types of television markets, local news matters to local residents as nine out of ten follow local news closely. Further, residents are involved in the local news process in varying ways, but to those who are most politically active, local news is vital.¹⁴

### Table 1: % who got news about politics & government in the previous week from...

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The availability of information about public concerns has significant consequences in localities. There was a strong relationship between local civic literacy and engagement and local media such that the “use of local news in newspapers was a somewhat better predictor of community knowledge and participation but local television news had a decided edge in local political interest”.¹⁵
As media organizations have increasingly been subsumed in larger corporate entities that have no experience with news, the tension between news as a public service and as a product has been exacerbated. News divisions are increasingly seen by investors and media executives as just another profit/loss node, rather than having some public interest obligation.\textsuperscript{16} As a result, the production of news is subject to a calculus that treats information as a commodity\textsuperscript{17} and that treatment has an effect on the nature of news and public affairs programming in local places.\textsuperscript{18}

**Research Question & Methodology**

This research examines the content of the local television newscasts in eight television markets in which SSAs and/or LMAs were implemented. There were two research questions and they addressed the economies of scale that the managers of the SSAs cite to justify the arrangements. First, the SSA managers point out that the arrangements provide the opportunity to disseminate the same content across various “platforms”, thereby reducing the cost of production relative to the number of opportunities to broadcast that content. Therefore, the first research question was: How were the stories that were presented on the newscasts distributed across the stations in each market?

The economies of scale extend beyond the use of platforms. They also are reflected in the use of production resources that affect the bottom line of the cost of presenting news, specifically the use of anchors, reporters, scripts and video. The second research question was: What is the distribution of anchors, reporters, story scripts and video/graphics in the stories that were presented on the broadcasts of the SSA/LMA stations.

**Methodology**

The methodology for this research was content analysis.\textsuperscript{19} It is a method that produces a systematic and objective description of information content. The analytical method used in this research was the Chi-square measure of association.

**The Television Markets**

This research focused on SSAs and/or LMAs in which the stations shared the news function because, by definition, they affected the production of the newscasts. At the time that the sample was drawn, the universe
of television markets in which SSAs were operative was 55. The existence of these agreements was confirmed by the author’s research using various data sources, including phone calls to the stations. The randomly drawn sample comprised eight television markets in which 37 stations regularly produced local newscasts. The markets ranged in size (as measured by the number of television households in the market) from number 17, Denver, CO to number 146, Wichita Falls, TX and collectively comprised over 4 million television households.

The markets represented a variety of ownership and management profiles. For example, Denver, CO, Des Moines, IA, Burlington, VT and Columbus, GA each had only one consolidated management structure in the market and there were at least two stations in each of the markets that were not a party to a services agreement (a condition called independent in this research). However, the remaining four television markets in the sample each had some combination of two SSAs or LMAs or duopoly. In Jacksonville, FL, there was an SSA (two stations) and a duopoly (two stations), leaving only one independent station in the market. In Dayton, OH, two separate LMAs involving two stations each left only one independent station in the market. The phenomenon was most pronounced in Peoria, IL and Wichita Falls, TX where there was no station in either market that was independent of an SSA or LMA arrangement.

**The stations in the sample:** The stations in the sample consisted of every station in the television market that regularly delivered a daily local newscast. For purposes of clarity and simplicity, the stations involved in an SSA or LMA will be identified as SA (service agreement) stations; those not involved in such an arrangement will be non-SA stations.

**The sample of broadcasts:** The sample of broadcasts for this research consisted of a constructed week of broadcasts during which the SSAs were operative in the television market. A constructed week consisted of the newscasts of a particular day gathered over an extended period of time. For example, the Monday of the first week and the Tuesday of the second week were in the sample, and so on until the broadcast week was constructed. The broadcast week was limited to the five weekdays, Monday through Friday, to eliminate the possibility of weekend sporting events that might have pre-empted newscasts. Therefore, the constructed week covered five weeks of time.
The broadcast content for this research was acquired from DirecTV. Due to the technical nature of the capture and archival process that DirecTV used, the exact same constructed week could not be used for all eight markets. The capture of broadcasts had to occur in a sequence to accommodate that technical process. However, the date to begin capture was randomly determined. That day was Wednesday, May 4, 2011. The first market in which broadcasts were captured was Dayton, Ohio. The Dayton broadcasts were those on Wednesday, May 4, Thursday, May 12, Friday, May 20, Monday, May 30 and Tuesday, June 7. That same approach was applied to the other markets. Because DirecTV could only capture the broadcasts of six markets at one time, the constructed weeks for the two remaining markets began immediately after the first six were completed. The broadcasts of Wichita Falls, Texas and Jacksonville, FL began on June 5 and June 6, respectively. The fact that different constructed weeks were used in the analysis was consistent with the research questions because the comparisons across stations only occurred within the television markets.

**Unit of observation:** The unit of observation for this research was the individual story that appeared on the broadcasts. Initially, the stories were distilled from the 25 broadcast units that were coded. These units included twenty-one story types and four other broadcast categories that were not included in the analysis--promos for the station/network; the weather segment; the sports segment and commercials. The professional literature regarding the construction of a newscast recognizes that the sports and weather segments are structural features of the broadcast. They are always included in the newscast and, as a result, they are not subject to the news selection calculus that is applied to all other stories. They are always “in” the broadcast. And, even within the segments, the “in-or-out” decision model is less stark than that used for the general news outside of the segments. In general, the sports segments on local television news deal with the day’s scores or activities of whatever sport is in season and not with in-depth sports reporting. The coding revealed a total of 2,555 separate stories that were broadcast across the stations. The stories were distilled from the 4,725 broadcast units that were presented. In addition to the stories (n=2,555), the distribution across the other broadcast units was: station promotions (n=895), commercials (n=746), weather segments (n=338) and sports segments (n=191).
Findings
The analysis revealed that the implementation of SSAs and LMAs had a profound effect on the local newscasts in the markets (referred to jointly here as SA stations). The effect was evident in the distribution of stories across the stations and in the use of shared resources, such as the anchor, the reporter, the script and video/graphics for the story.

Sharing Platforms
By definition, the duplications did not occur on the non-joint operating agreement (non-SA) stations in the markets. However, there may have been stories that, on their merits, would have been broadcast on all of the stations in the market and that proportion would temper the duplicated distribution across the SA stations. For example, a story about the Presidential campaign might be carried on all of the stations due to the inherent merit of the topic. The analysis showed that only seven percent of the stories were broadcast on all of the stations in the market. Therefore, story duplication was a SA/duopoly phenomenon. There was a statistically significant difference across the DMAs in that distribution (p<.05).

Fig. 1: Percentage of duplicated stories on the SSA/LMA/Duopoly stations
The proportion of duplicated stories on the SA/duopoly stations was above 50% in six out of the eight markets (Figure1). However, there was also an overall pattern to the duplication rate. In general, the duplication rate among SA stations was less prominent in the markets in which there were non-SA stations. For example, the highest proportion of duplicated stories occurred in Dayton where there were two LMAs and only one independent station. The LMA between WRGT and WKEF resulted in a 98% duplication rate and the rate for the second LMA between WDTN and WBDT was 35%. In Peoria, where there were no non-SA stations, the SSA proportion of combination stories was 78%; the LMA’s proportion was 59%. In Jacksonville, with one independent station, the SSA proportion of combination stories was 64%; but the duopoly in the market produced a simulcast so the proportion of combination stories for that arrangement was 100%. That said, the market that did not follow that trend was Wichita Falls. There were no non-SA stations in the market, however, the duplication rate for the SSA between KFDX and KJTL was only 30%. The second SSA between KSWO and KAUZ duplicated very few stories. In the opposite direction, Denver, where there were three non-SA stations, also did not follow the trend where its one LMA had a duplication rate of 71%.

On the other side of that equation, in general, the markets with, at least, two SA stations saw lower story duplication rates among its service agreement partners. For example, Des Moines, Burlington and Columbus (smaller markets in the sample) had substantially lower rates. The SSA in Burlington between WFFF and WVNY duplicated 58% of their stories and the SSAs in Des Moines and Columbus had duplication rates below 50%

These findings show that, for the most part, the SA stations took advantage of the arrangement to present similar or the same stories on a combination of their stations. Given the nature of the agreements, these results could be expected.

**Sharing Scripts and Video/Graphics**

The use of various “platforms” to present the stories was one aspect to consider in examining the implementation of the service agreements. However, perhaps the most important factor to gauge the economies of scale achieved by the agreements was the use of particular resources that affect the bottom line—the personnel used to convey the content of the story (anchors and reporters) and the content used to describe
the story (script and video/graphics). The use of resources was operationalized as the proportion of stories that used the same anchor, same reporter, same script and/or the same video/graphics on the newscasts of the stations that were parties to the service agreements. The effect of these characteristics was varied across the markets. The SA stations took full advantage of the access to their partner resources, particularly scripts and video/graphics. Across all of the SA stations, the duplicated stories, on average, shared the same script almost three-quarters of the time (73%) and the same video/graphics eight times out of ten (80%). There was a statistically significant difference across the DMAs in the distributions (Figure 2, p<.05).

In Dayton, with one independent station, the LMA between WRGT and WKEF used the same script and the same video/graphics in almost all of the duplicated stories (97% for each). As a result, the audiences for both of those newscasts saw the exact same story presented in the exact same way. The second LMA in the market (between WDTN and WBDT) shared the same script over half of the time (52%) and shared the same video/graphics 80% of the time. In Peoria, where there is no independent station, the stations in the SSA used the same script and the same video/graphics almost all of the time (95% and 91%, respectively). In addition, the LMA in the market (between WYZZ and
WMBD) used the same script and same video/graphics almost as much (92% and 89%, respectively).

At the lower end of the spectrum for the use of these resources was the SSA (WAWS and WTEV) in Jacksonville at 21% (script) and 47% (video/graphics). However, that was tempered by the activity of the duopoly (WLTV and WJXX) in the market that presented the same news as a simulcast on both stations. By definition, the result was a use of the same script and same video/graphics 100% of the time.

In Columbus and Wichita Falls the proportion of combination stories in both markets was well below fifty percent, but when the stories were broadcast on the combination of stations, they used the same script most of the time (90% and 80% for Columbus and Wichita Falls, respectively) and the same video/graphics (86% and 89%, respectively).

In Burlington about three-fourths of the combination stories used the same script and four out of five stories used the same video/graphics. In Des Moines the SSA had the least effect on the use of these resources, just over one-third of combination stories shared the same script and over half shared the same video/graphics.

Sharing Anchors and Reporters

Scripts and video/graphics are two areas in which the effects of the services agreements are played out. As in most labor-intensive enterprises, personnel represent a critical factor in the cost calculus. For television stations, part of that cost that translates into the cost of anchors and reporters. Of course, there are other personnel costs for stations, including producers, directors, news writers, graphic artists and camera operators, but for this research the use of anchors and reporters was the most visible representation of those costs. For the stations that are parties to the service agreements, this cost also offers another possibility to achieve economies of scale---using the same anchors and reporters to present the stories across several stations' newscasts. The stations did so for both anchors (on average 42% of stories) and reporters (on average 37% of stories). However, there was wide variation across the television markets (Figure 3).

In Dayton, the LMA between WRGT and WKEF shared the same anchor for almost all of the stories (97%) and shared the same reporter for just over one-third (37%) of the stories. However, we must keep in mind
that the LMA also shared script and video_graphics well over 90% of the time. Therefore, for two-thirds of the stories, the LMA stations just used another reporter to deliver the exact same script and video/Graphics. The second LMA in Dayton (between WDTN and WBDT) used the same anchor and same reporter much less often (31% and 14%, respectively). In Jacksonville the SSA duplicated the anchor for almost two-thirds of the stories (64%), but it only used the same reporter for a small proportion of stories (14%). However, the duopoly in the market, with its simulcast of the news, used the same anchor and reporter for 100% of its stories. Columbus was the only other market in which the same reporter was used for well over half (61%) of the stories.

By these measures, we see that the SSAs and LMAs had their intended effects regarding the achievement of economies of scale. These measures focus on the specific aspects of the agreements that their managers said would underpin the combined news operations—the use of multiple platforms and the shared use of resources. These findings confirm that the SSAs and LMAs functioned as planned—they used the multiple platforms and they shared the resources necessary to convey news stories. One could expect those actions, otherwise, the stated economic purposes of entering into the agreements would be moot. The obvious and unambiguous result was a reduction in the number of separate news voices in the markets.
Conclusion

The movement toward service agreements undoubtedly will continue. There are economic incentives for such endeavors. In fact, the Coalition of Smaller-Market Television Stations filed an ex parte comment with the FCC and met with FCC staffers in December 2011 to press the case for the need for shared services agreements. The record shows that these arrangements have invariably resulted in a loss of jobs. In addition to the losses in Honolulu, the SSA in Idaho Falls, ID resulted in the loss of 27 jobs. In Providence, RI, fifteen jobs were lost when Citadel Communications implemented an LMA with ABC affiliate. Such is the nature of mergers.

These arrangements can also result in conditions that turn the notion of a competitive market on its head. One such situation occurs in upstate New York. In Syracuse, the CBS (WTVH) and the NBC (WSTM) affiliates are parties to a shared services agreement. In Utica, fifty-seven miles east of Syracuse, there is no CBS affiliate. Therefore, the Syracuse station, WTVH, is granted a spot on the cable in Utica to operate in that market. The NBC affiliate in Utica is WKTV and it is called upon several times a month by the NBC affiliate in Syracuse (WSTM) to supply video and material, generally for a local lead story. However, due to the SSA between the two Syracuse stations, WSTM shares the material with the CBS affiliate (WTVH), which then broadcasts back in Utica. In effect, then, the NBC affiliate in Utica is supplying content directly to its competition in its own market.

There has been some suggestion that the development of services agreements, whether Shared Services, Joint Services, Local Marketing or Local News, has, on the whole, added news content to the market in which they were implemented. That is an empirical question, not a philosophical one. Empirically, we can look at the news operations of the stations that were parties to the service agreements and determine whether or not they provided a newscast before entering into the agreement. For the eleven SSA/LMA combinations examined in this research, eight of them involved stations that each produced their own newscasts before the agreement was implemented. In addition, the stations in the duopoly (in Jacksonville) that were also part of this research each produced separate newscasts before joining. Therefore, the result is that three-fourths (nine of twelve) of the agreements
included stations that produced separate newscasts before the implementation of the arrangement.

Those who suggest that the arrangements add news to the market by broadcasting the same newscast on a station that had not previously presented news stretch the logic of the claim. Simply showing the same news on another station is not a qualitative addition of information to the public. It is not more news.

Local television stations are private firms and they have a fiduciary responsibility to provide a return on investment for their owners. However, they conduct their business using a public good—the electromagnetic spectrum. And that imposes public interest responsibilities on the stations as well.

This research has revealed that, to this point, the service agreements have a significant effect on local broadcast news content for those stations that are parties to the arrangement. Economies of scale dictate that production costs and cross-platform marketability limit the diversity and the availability to the public of news stories.

As noted earlier, the FCC expressed concern about the impact of SSA’s on local news diversity in March 2015, and sent a warning to the broadcasters regarding future and existing SSAs:

We reject arguments that we should automatically grandfather all television JSAs permanently or indefinitely. In these circumstances, we find that such grandfathering would allow arbitrary and inconsistent changes to the level of permissible common ownership on a market-by-market basis based not necessarily on where the public interest lies...Moreover... [current] licensees may seek a waiver of our rules if they believe strict application of the rules would not serve the public interest.26

Policy makers, and the public need to understand, that there is nothing new about repeated news stretched thin across several hours and multiple stations and platforms purporting to serve the same local community. Our increasingly complex society requires more news, not less . . . and certainly not the same old stories.
References


3 Steve Waldman, The Information Needs of Communities; the Changing Media Landscape in a Broad

4 Papper, B. The business of news: newsroom profitability, budgets and partnerships. RTNDA/Hofstra University Survey, June 1, 2015.


21 The distribution of the stories across the eight television markets was: Denver=412; Dayton=366; Jacksonville=336; Des Moines=329; Peoria=272; Wichita Falls=243; Burlington=374 and Columbus=223.


25 Personal communication with knowledgeable source regarding station news practices who requested that his/her identity be kept confidential. October 30, 2012.