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WORKING PAPER

MEDIA OWNERSHIP AND THE DIVERSITY INDEX: OUTLINING A SOCIAL SCIENCE RESEARCH AGENDA

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Media Ownership and the Diversity Index: Outlining a Social Science Research Agenda

Abstract

This paper examines the wide range of lines of social scientific inquiry raised in the ongoing process of assessing and formulating media ownership policy. Specifically, this paper examines the areas of inquiry raised by the FCC's effort to craft an index for assessing viewpoint diversity in local media markets.

Media Ownership and the Diversity Index: Outlining a Social Science Research Agenda

Media policymaking appears to be undergoing an expansion in its analytical orientation. The questions being asked, and issues being raised, by policymakers and the courts more frequently delve into a wider range of areas of social scientific inquiry than has characterized the past two decades of policymaking and policy analysis. Policymakers, policy analysts, and courts are now raising issues and questions pertaining to how citizens use different media technologies to obtain information (Waldfogel, 2002); if/how media content varies in accordance with variations in market and ownership conditions (Federal Communications Commission, 2002, 2004; Spavins, Denison, Frenette, & Roberts, 2002); what factors contribute to biased or ideologically slanted news content (Balan, DeGraba, & Wickelgren, 2004); and what criteria should be employed in defining a media outlet and the magnitude of its impact (Prometheus Radio Project v. Federal Communications Commission, 2004).

Given this change of climate, and the broader range of questions now being asked by policymakers, this paper attempts to identify existing areas of scholarly inquiry that may prove fruitful to decision-makers; and to suggest extensions of these lines of inquiry that may more directly serve the needs of policy decision-makers. This paper presents a rather narrowly focused effort at such an assessment, via an examination of the lines of social scientific inquiry that can inform ongoing efforts to assess media ownership policies, particularly in terms of the Federal Communications Commission's ongoing effort to construct a rigorous and reliable Diversity Index to be used in the assessment of individual media markets and the effects of modifications of existing ownership regulations on levels of diversity within these markets.

The first section of this paper provides a brief overview of the media ownership issue, in terms of the process undertaken by the FCC, the outcome of this process, and its ramifications. The second section examines the issues raised by the Commission, the courts, and other

stakeholders in regards to the ownership proceeding for which areas of social scientific research not typically integrated into policymaking and policy analysis may be able to make a significant contribution. As this section will illustrate, the ongoing discussion over how best to assess viewpoint diversity in local media markets touches upon a host of research areas that have been explored in significant detail. This section explores some of these potential and offers suggestions as to how future research in these areas can more directly address the specific needs of policymakers. The final section summarizes the key points of this essay and offers some concluding observations about the state of the relationship between social science research and communications policymaking.

Media Ownership, Diversity Policy, and the Diversity Index

Section 202(h) of the Telecommunications Act of 1996 required the Federal Communications Commission to biennially review its media ownership rules "to determine whether any of such rules are necessary in the public interest as the result of competition" (Section 202(h),110 Stat. at 111-112). The Act also required the Commission to "repeal or modify any regulation it determines to be no longer in the public interest (Telecommunications Act of 1996, Section 202(h), 110, Stat. at 111-112). For the 2002 review, Federal Communications Commission Chairman Michael Powell initiated what he described as the "most comprehensive look at media ownership regulation ever undertaken by the FCC" (Federal Communications Commission, 2002, p. 1). Powell specifically emphasized the importance of developing the necessary factual record to guide the Commission's decision-making in this area. As he stated in 2001, at the beginning of the media ownership inquiry, "Rebuilding the factual foundation of the Commission's media ownership regulations is one of my top priorities" (Federal Communications Commission, 2001, p. 1).

As part of this process, the Commission created a Media Ownership Working Group, which conducted internally – and commissioned from external sources – a series of research projects on a

wide range of issues relevant to the media ownership proceeding (Federal Communications Commission, 2002). Included in the Commission's research record were studies that examined the relationship between ownership of media content/outlets and the diversity of content provided (Einstein, 2002; Pritchard, 2002), as well as studies examining how people use different media (Nielsen Media Research, 2002), and the extent to which different media technologies serve as substitutes for each other for consumers seeking news and information (Waldfogel, 2002).

The end result of this process was a June 2, 2003 Report and Order that substantially relaxed a wide range of media ownership regulations, including the local television ownership rule (limiting the number of television stations a single entity could own within a single market), the broadcast-newspaper cross-ownership rule (limiting broadcast-newspaper combinations within a single market), and the national television ownership rule (limiting the national audience reach of a television station owner) (Federal Communications Commission, 2003).

Included in this decision was a newly-developed Diversity Index, which the Commission created internally to serve as a guide in assessing the status of local media markets and the appropriateness of permitting further ownership consolidation within these markets. The Commission's Diversity Index had as its basis the well-known Herfindahl-Hirschman Index, which measures market concentration via summing the squared market shares of each firm in a market. The Diversity Index extended and modified the HHI in a number of ways. The FCC described the methodology as follows:

> In terms of calculating the Index, within each medium we combine commonly-owned outlets and calculate each owner's share of the total availability of that medium. We then multiply that share by the share of the medium in question in the total media universe (television plus newspaper plus radio plus Internet). Once these shares in the overall "diversity market" have been calculated, we add together the shares of properties that are commonly-owned

> (e.g., a newspaper and a television station), square the resultant shares, and sum them to get the base Diversity Index for the market in question (Federal Communications Commission, 2003, p. 13790).

This description merits some clarification. First, as is indicated by the above description, an owner's holdings in each medium (television, newspapers, radio, and the Internet)[1] are first computed separately, with an owner's "share" of a particular medium calculated in terms of the proportion of the available outlets that the owner controls (thus, for instance, a firm owning two of the six television stations in the market would have a 33.3 percent share). Then, the owner's share for each medium is weighted separately, with the weights being derived from a consumer survey (Nielsen Media Research, 2002) in which respondents were asked to identify their primary sources of local and national news, and to assess the importance of different media as news sources. Specifically, the weights were derived from a survey question in which respondents were asked which types of media they had utilized for obtaining news and current affairs within the past seven days. Thus, for instance, 57.8 percent of respondents claimed to have utilized television to obtain news and current affairs within the past seven days. Based on these responses, the weighting scheme employed for the media included in the Diversity Index was as follows: television – 57.8 percent; newspapers – 25.8 percent; radio – 10.3; Internet – 6.1 percent (Federal Communications Commission, 2003).

The weighting process would then be employed, with, for example, the 33.3 percent share of the broadcast television market described above multiplied by 57.8 (the weighting score for television) – and so on for each medium – to determine that firm's share of the "diversity market." Once this process has been completed for all of the holdings of each firm in the market, each firm's total share is squared, then summed (following the HHI methodology) to produce the Diversity Index for that market.

The Commission's key objective in creating this index was to have a mechanism for empirically assessing viewpoint diversity within local media markets that could provide guidance as to when to allow mergers to take place within these markets. To the extent that data on media usage are incorporated into the calculus, the index represents a significant – and largely unprecedented – move forward in terms of factoring the dynamics of media consumption into media ownership policy analysis. Based in part on the conclusions derived from employing this index in the analysis of a sample of media markets, the Commission concluded that the bulk of its ownership regulations could be substantially relaxed (Federal Communications Commission, 2003).

The ramifications of the Commission's decision have been well-documented (e.g., Scott, 2004). Amidst a substantial outcry from both the public and members of Congress (see Scott, 2004), the Commission's media ownership decision was challenged in court by public interest advocates arguing that the rule changes had gone too far in allowing increased consolidation, and by industry participants who argued that the relaxation of the ownership rules did not go far enough (see Prometheus Radio Project v. Federal Communications Commission, 2004, pp. 388-389). After a jurisdictional lottery, the case was tried in the U.S. Court of Appeals for the Third Circuit in Philadelphia. The court remanded the bulk of the Commission's ownership decision, due in large part to the perceived failure of the Commission to justify its particular chosen ownership limits (Prometheus Radio Project v. Federal Communications Commission, 2004, p. 382). The Federal Communications Commission is now, consequently, in the process of deciding whether to appeal the Third Circuit's decision, and also working on strengthening the analytical work underlying the rationales for its decisions.

Making and Remaking Media Ownership Policy: Points of Entry for Social Science Research

On the basis the Court of Appeals for the Third Circuit's decision directing the FCC to reconsider and better support its decision-making, and considering the fact that the Commission is

required to reassess its ownership regulations every two years, the question of the most effective analytical approach to formulating and assessing media ownership policy is likely to remain a prominent one for years to come. Examining the FCC's analytical process pertaining to the media ownership rules in greater detail, and examining the specific concerns raised by the Court of Appeals for the Third Circuit, helps to illustrate the various areas of inquiry in which social science research may be able to make contributions to both ongoing and future efforts to assess diversity in media markets and craft effective media ownership regulations.

Many of these areas of inquiry stem from the central issue of how best to assess the "diversity importance" (Federal Communications Commission, 2003, p. 13777) of different information sources. This was the key objective of the Commission's Diversity Index – to develop a reasonably sensitive measure of the impact on viewpoint diversity of ownership changes within and across multiple media technologies in local media markets in a way that could account for variations in the importance, from a diversity standpoint, of different information sources (Federal Communications Commission, 2003). Moreover, it is around this issue of how to best assess the diversity importance of different information sources that the Court of Appeals for the Third Circuit seemed to have taken the greatest issue with the Commission's work (Prometheus Radio Project v. Federal Communications Commission, 2004; see below). Consequently, this issue area represents the line of inquiry around which the greatest amount of additional work needs to take place – and also the line of inquiry toward which existing lines of social science research may be able to make a significant contribution from a number of perspectives.

This section begins, then, with an examination of a number of different conceptual elements of potential relevance to assessing the importance of different information sources from a diversity assessment standpoint. In each case, the element under discussion is identified (though in some cases, somewhat indirectly) from the FCC's or the court's decision-making. Figure 1 provides a

visual map of the discussion that is to follow. In this figure, the central concept of the "diversity importance" of different information sources is surrounded by the various potentially relevant conceptual elements, which are, in turn, accompanied by listings of the areas of research that are of potential use in clarifying and applying these conceptual elements. The purpose of this overview is to identify relevant research issues that are raised and the possible areas of research that could inform policy decision-making in relation to assessing the diversity importance of different information sources and formulating effective media ownership policies.

INSERT FIGURE 1 HERE

Content

The first element of potential relevance in assessing the importance of different media in relation to viewpoint diversity is content-related. Specifically, the amount of time/space devoted to local news or public affairs by a particular media technology or outlet could potentially function as a significant factor in determining the importance of different media outlets or technologies from a diversity standpoint. As the Federal Communications Commission stated in its June, 2003 Report and Order, "we find that viewpoint diversity is most easily measured through news and public affairs programming. Not only is news programming more easily measured than other types of content containing viewpoints, but it relates most directly to the Commission's core policy objective of facilitating robust democratic discourse in the media" (p. 13631). Later in this decision, the Commission is even more direct in this regard, stating, "News and public affairs programming is the clearest example of programming that can provide viewpoint diversity" (Federal Communications Commission, 2003, p. 13776). The Commission relates such content directly to its Diversity Index when it notes that, "Our Diversity Index focuses on availability of sources of local news and current affairs" (Federal Communications Commission, 2003, p. 13780).

Such statements suggest that content differences between individual media outlets or technologies – in terms of their provision of news and public affairs – should be factored into the calculus of assessing viewpoint diversity in media markets. The fact that the Commission produced such an assessment in conjunction with the work of its Media Ownership Working Group (Spavins, et al., 2002) further suggests that attention to this issue may be appropriate. Nonetheless, the Commission elected not to integrate a content element into its Diversity Index, in part because of its belief that:

> this type of content analysis would present both legal/Constitutional and data collection problems. News and current affairs content is not necessarily limited to regularly-scheduled news programs. So we could be faced with deciding which other programs were news and current affairs, whether some portion of a program not primarily news should count as news, and, indeed, whether portions of a news report devoted, e.g., to movie reviews should count as news. (Federal Communications Commission, 2003, p. 13787)

The Court of Appeals for the Third Circuit, however, found this logic unpersuasive, describing the Commission's reference to data collection problems as "vague and unexplained" (Prometheus Radio Project v. Federal Communications Commission, 2004, p. 409). Moreover, the court expressed concern about any analytical approach that did not contain some content indicator when it stated that "assigning equal market shares to outlets that provide no local news almost certainly presents an understated view of concentration in several markets, thus contravening the Commission's goal of making 'the most conservative assumption possible' about viewpoint diversity" (Prometheus Radio Project v. Federal Communications Commission, 2004, p. 408, citation omitted).

If, then, news and public affairs content is a *potentially appropriate* indicator for determining the diversity importance of different information sources, then such differences in content provision

across information sources should be assessed in a systematic and rigorous manner, something toward which the content analysis methodology employed by researchers across a wide range of social science disciplines (sociology, communication, political science) could make a valuable contribution.[2] We see, for instance, the important insights that can be derived from rigorously analyzing media outlets' local news and public affairs programming output in the work of Singleton and Rockwell (2003). Their study illustrates that the extent to which the Commission has traditionally relied upon the provision of local news and public affairs in its definition of a "voice" in a local media market is, in fact, undermined by the fact that many media outlets provide no such content. Their analysis of television stations finds that, "In the nation's top fifty markets there were 162 television stations that apparently did not provide any local news or public affairs programming. Forty-nine of the top fifty television markets had at least one 'silent voice'" (Singleton & Rockwell, 2003, p. 398). Findings such as these[3] suggest that allocating equal weight to all outlets of a certain type in a market may severely misrepresent the extent to which these outlets are serving as comparable sources of local news and public affairs, and are thus of comparable diversity importance. Moreover, to the extent that the Commission has emphasized the importance of *locally-oriented* news and information (Federal Communications Commission, 2003, 2004), research that has examined local news content to determine the true extent of its local orientation (Adams, 1978, 1980; Adams & Baldasty, 2001; Slattery, Hakanen, & Doremus, 2001)[4] may provide useful empirical findings or methodological suggestions for future efforts to assess the diversity importance of different information sources from a content standpoint.

Issues such as these were at the core of the Court of Appeals for the Third Circuit's rejection of the Commission's decision to include the Internet as a local information source in its viewpoint diversity calculus (Prometheus Radio Project v. Federal Communications Commission, 2003). In support of this decision, the court noted that "The Commission does not cite, nor does the record

contain, persuasive evidence that there is a significant presence of independent local news sites on the Internet. . . . And the examples the Commission does cite – the Drudge Report and Salon.com – have a national, not local, news focus (Prometheus Radio Project v. Federal Communications Commission, 2004, p. 406).

As this statement suggests, in terms of formulating and justifying its ownership policies to the satisfaction of the courts, the Commission may need to devote greater attention not just to the availability of media different media outlets, but also to the nature of the content that they provide. Any effort to assess, from a content standpoint, the contribution of individual information sources to viewpoint diversity in the process of crafting a rigorous and reliable Diversity Index may need to be more intensively grounded in the extent to which different media technologies or outlets provide news and public affairs content – and the extent to which such content is indeed local in its orientation. Further exploration of the available content analysis tools and methods developed across the social sciences likely would prove useful in any such endeavor.

How and Why Citizens/Consumers Use Different Media

At the core of the FCC's current mechanism for weighting different information sources is the extent to which citizens/consumers report relying on different media for news and current affairs. In describing its methodology for computing the Diversity Index, the Commission stated that, "First, we premise our analysis on people's actual usage patterns across media today. Nonetheless, our method for measuring viewpoint diversity weights outlets based on the way people actually use them rather than what is actually available as a local news source."[5]

Thus, how citizens/consumers use different media has played – and likely will continue to play – a significant part in assessing the importance of different media from a diversity policy standpoint. The logic here, of course, stems in part from the content-focused element discussed above, in which the Commission articulated its belief that the extent to which different media serve the news and

public affairs needs of the citizenry should be at the core of determining their importance in assessing viewpoint diversity in local media markets (Federal Communications Commission, 2003). It is important to emphasize that this analytical orientation represents a virtually unprecedented step forward by policymakers in terms of attempting to integrate the dynamics of citizens' media usage behavior into formulating and analyzing media ownership policy.

What is vital, of course, in this situation, is that the Commission accurately reflect citizens/consumers' media usage behaviors in its calculus. Whether the Commission succeeded in this regard was a significant point of contention both during and after the June, 2003 decision. Critics of the media usage survey that provided the foundation for the usage weighting noted that, even though the Commission was primarily concerned with media usage for local news and information, the survey question that formed the basis of the weighting measure was worded in such a way as to ask the respondents which sources of local or national news had they consulted within the past seven days, thereby undermining the data as an effective means of assessing the diversity importance of different information sources at the local level – a weakness acknowledged by the Commission (Federal Communications Commission, 2003, summarizing comments of the Consumer Federation of America; see also Cooper, 2004).

Moreover, these same critics argued that the underlying dynamics of media usage are more complex than the Commission's usage survey would suggest, with different media serving distinctly different functions for citizens/consumers – for example television news broadcasts serving as the primary source of "breaking news," newspapers providing a follow-up and analysis function, and talk radio programs serving primarily to disseminate viewpoints (Federal Communications Commission, 2003, summarizing comments of the Consumer Federation of America). From this perspective, the extent to which the Commission operated under the assumption that "that consumers use multiple media as sources of news and current affairs, and hence that different media

can be substitutes in providing viewpoint diversity" (Federal Communications Commission, 2003, p. 13779) might be inappropriate, or might not effectively capture the complexity 9inherent in the dynamics of media usage.

Critiques such as these point to the potentially greater level of sophistication that can (and perhaps should) be brought to bear on the process of assessing how and why citizens/consumers use different information sources in a way that most effectively captures variations in their diversity importance. The current state of affairs, then, would seem to be one in which it would be enormously valuable for policymakers to become more deeply versed in the literature on how and why citizens/consumers use different media, and thereby develop a more theoretically and empirically robust approach to integrating media usage data into media ownership policymaking.

The extensive uses and gratifications literature (e.g., Blumler & Katz, 1974; Rayburn, 1996; Ruggiero, 2000) would seem to provide a natural starting point. As Mendelsohn (1974) noted in an early exploration of possible applications of uses and gratifications research to communications policy, "the integration of generalized social science intelligence regarding specific audiences, together with media-related information about them, allows for the development of policies for filling important gapes in the media enterprise. Thus, social science research can provide a basis for changing media policy in line with the media-related needs, expectations, uses, and gratifications of particular audiences . . ." (p. 312).

Research in the uses and gratifications tradition can potentially inform the largely unresolved policy question regarding if – or to what extent – different information sources serve as substitutes or complements for each other, in ways that account for both how and why citizens/consumers use different information sources (e.g., Kaye & Johnson, 2002). Work on how citizens obtain political information from the media has mapped out the different ways that citizens/consumers use different information sources to obtain information, as well as the different types of news

consumers served by these different media (e.g., Chaffee & Frank, 1997)[6] – work that would seem to bear directly on policymakers efforts to effectively calibrate the differential levels of importance of different information sources. In addition, some recent studies have addressed the issue of the substitutability of information sources, particularly in terms of the relationship between old and new media. For instance, recent research has failed to find particularly strong evidence that the Internet serves as a meaningful substitute for traditional news media (Althaus & Tewksbury, 2000; Dimmick, Chen, & Li, 2004), suggesting that a policy approach that considers the Internet as comparable to existing information sources from a diversity importance standpoint may not accurately reflect the dynamics of how citizens/consumers are integrating new media into their more established array of information sources.

In sum, as policymakers presumably move forward in developing more robust mechanisms for gauging the extent to which citizens/consumers rely upon different information sources for local news and information, the uses and gratifications perspective can serve as a potentially valuable source of theoretical, empirical, or methodological guidance.

Potential or Actual Audience Reach

Another concept of potential relevance in assessing the diversity importance of different information sources is the potential or actual audience reach of each source. As the Commission noted in expressing the nature of the concerns that were central to its ownership policy analysis, "we retain our emphasis on the citizen/viewer/listener and on ensuring that viewpoint proponents have opportunities to reach the citizen/viewer/listener (Federal Communications Commission, 2003, p. 13775). As this statement suggests, assessing the potential of different viewpoints to reach audiences is a key concern from an ownership policy standpoint. Despite this concern regarding the potential reach of different viewpoints, the Commission did not go particularly far in its initial

iteration of the Diversity Index in terms of integrating this concern into its analytical framework. As the Commission stated:

> Having decided on relative weights for the various media, we next confront whether and how to weight different media outlets within each category. The decision of whether to do weighting turns on whether our focus is on the availability of outlets as a measure of potential voices or whether it is on usage (*i.e.*, which outlets are currently being used by consumers for news and information). We have chosen the availability measure, which is implemented by counting the number of independent outlets available for a particular medium and assuming that all outlets within a medium have equal shares. . . . The underlying assumption here is that all outlets have at least similar technical coverage characteristics. (Federal Communications Commission, 2003, p. 13786)

The Commission then goes on to note that this assumption holds up relatively well within the context of television stations and newspapers, but not particularly well within the context of radio stations (where the different signal strengths of different stations lead to dramatically different levels of potential audience reach (Federal Communications Commission, 2003). Nonetheless, the Commission concludes that "we believe the assumption to be reasonable across all cases" (Federal Communications Commission, 2003, p. 13786).

Presumably, the Commission could have taken an approach that would have weighted media outlets by their true potential to reach viewers/listeners/readers within a particular media market. Thus, for instance, a full power VHF television station (presumably with cable carriage on all cable systems in a market) would have been weighted more heavily than a relatively low-power FM radio station with sufficient signal strength only to reach half of the listeners in a market. To the extent that the diversity importance of an information source is at least in part a function of its ability to reach citizens/consumers, than this more nuanced – though certainly much more complex and

labor-intensive – approach would more accurately reflect the importance of different information sources.

Of course, one could also take this approach a step further, and go beyond the potential audience reach of an information source to its actual audience reach. Under this scenario, it is the size of the audience that the information source actually attracts that becomes the foundation for weighting its importance from a diversity assessment standpoint.

This approach was the path that the Court of Appeals for the Third Circuit seemed to view as most appropriate. The court took issue with the Commission's strategy of accounting for differentials in the reach/impact of different media at the level of technology but then ignoring such potential differentials at the level of individual outlets. According to the court: "The Commission's decision to assign equal market shares to outlets within a media type does not jibe with the Commission's decision to assign relative weights to the different media types themselves (Prometheus Radio Project v. Federal Communications Commission, 2003, p. 408). The court pointed out the Commission's own statement that "'Not all voices, however, speak with the same volume,'" going on to argue that the Commission's approach "negates [its] proffered rationale for using the HHI formula in the first place – to allow it to measure the actual loss of diversity from consolidation by taking into account the actual 'diversity importance' of the merging parties" (Prometheus Radio Project v. Federal Communications Commission, 2003, p. 408, citations omitted). The court went on to say that "the Commission's attempt to justify its failure to consider actual market share of outlets within a media type is not persuasive. It suggests that actual-use data is not relevant because 'current behavior is not necessarily an accurate predictor of future behavior.' But this truism did not prevent the Commission from preferring actual-use data in assigning relative weight to the different media types" (Prometheus Radio Project v. Federal Communications Commission, 2004, pp. 408-409).

It would appear, then, that any revised efforts to assess the diversity importance of individual media outlets may need to address the actual audience reach of these outlets. Such an approach would seem to fit squarely within the realm of the field of audience research, as a number of audience research questions naturally arise once an audience reach element is incorporated into the calculus. One key question would involve the best approaches to aggregating and analyzing the relevant audience data in ways that would accurately differentiate the audience reach of different outlets. Answering this question may, on the surface, appear simple, but as audience behavior research tells us, audience exposure can be assessed at either the individual (micro) level or at the more aggregate (macro) level (Webster, Phalen, & Lichty, 2000), with the different approaches potentially providing significantly different portraits of the distribution of audience attention.

Another relevant question involves the extent to which any analysis of actual audience reach should be integrated with an assessment of potential audience research, given the fairly extensive body of audience behavior research indicating that audience size is, to a large degree, a product of structural media factors such as signal strength, household penetration, channel capacity, etc. (Neuman, 1991; Webster & Phalen, 1997). Economist Bruce Owen (2004) has noted the potential danger of confusing success with access – that is, of taking evidence of a heavy concentration of audience attention around a select few media sources (e.g., Webster & Lin, 2002; Yim, 2003) as evidence that a media market is necessarily heavily concentrated, or possesses structural characteristics that are limiting access to a wide range of content options and viewpoints. To the extent that future efforts at assessing the diversity importance of different information sources may need to consider actual audience research, audience behavior research could prove enormously useful in helping to disentangle the complex knot of factors that determine the audience size for a particular media outlet.

Effects

Finally, there is the question of whether any assessment of the diversity importance of different information sources should delve into the realm of media effects. To a certain degree, implicit in the oft-used term "importance" by both the Court of Appeals for the Third Circuit and the FCC is some notion of the magnitude of the effect that a particular information sources can have on an individual or a community, but this connotation is perhaps indirect at best. However, some other statements by the Commission in its June, 2003 Report and Order suggest a more direct relationship between assessing viewpoint diversity and accounting for the magnitude of the effect of a particular information source. As the Commission notes in relation to its media usage survey (Nielsen Media Research, 2002), "The differences in usage across media documented in MOWG Study No. 8 are in part reflections of the differential impact on the user of television, radio, newspapers, etc. We believe that the overall impact of a medium is substantially determined by the physical attributes of its distribution technology, along with user preferences" (Federal Communications Commission, 2003, p. 13787).

Here, with the Commission's use of term "impact," the relevance of considering the media effects issue becomes more pronounced. In gauging the diversity importance of different information sources, it would therefore seem of potential relevance to more directly examine the nature and magnitude of the effects that different information sources have upon the citizenry. Given the enormity, and the theoretical and methodological diversity of the media effects literature, the question then becomes, within the context of media ownership policy, which realm(s) of media effects research are of the greatest relevance?

For guidance on this question, it is useful to consider the Commission's statement in its June, 2003 Report and Order, in which it stated that "owners of media outlets clearly have the ability to affect public discourse, including political and governmental affairs, through their coverage of news and public affairs. . . . We believe sound public policy requires us to assume that power is being, or

could be, exercised (Federal Communications Commission, 2003, p. 13630). From this statement, it would seem that it would be best to focus on media effects issues in relation to political and governmental affairs. Two potentially useful bodies of research – and potentially fruitful lines of future inquiry – would be agenda-setting research (e.g., McCombs & Shaw, 1972; Wanta, 1997), as well as research on the relationship between media usage and civic involvement (e.g., Emig, 1995; Friedland, 2001) and political participation (Scheufele, 2002; Shah, McLeod, & Yoon, 2001).[7]

Considering first the potential relevance of agenda-setting research to media ownership policy, it is important to emphasize the central objective of the Diversity Index of providing a means of assessing the diversity importance of individual information sources. As was noted above, this importance may be appropriately conceptualized at least in part in terms of the magnitude of the effects of different information sources. Thus, as the Commission seeks to determine how best to weight the importance of radio versus television versus newspapers versus the Internet, etc., it may be useful to have as the foundation of such an assessment a detailed understanding of the extent to which these different media technologies appear capable of influencing the citizenry's perceptions of the most important issues facing their communities. Such an approach would represent a more direct approach to the differential degrees of "impact" of different information sources that the Commission is attempting to tap via its current methodology of assessing reasons for usage and market shares.

Agenda-setting research typically has had a national orientation (due, in large part, to the greater availability of national media content for analysis). However, research examining the agenda-setting process at the local level – perhaps in conjunction with analysis of media usage patterns – could provide valuable baseline data in terms of which information sources truly exert the greatest impact on the citizenry in terms of their cognitions of issue salience. Previous research, for example suggests that newspapers exert the strongest agenda-setting effect, followed by broadcast television

news (Wanta, 1997). Findings such as these, and/or the research designs from which they were derived, could potentially be integrated into future efforts by policymakers to differentiate information sources in terms of their diversity importance.

Moreover, the related agenda-setting work that has examined the inter-media agenda-setting process (wherein certain information sources appear to systematically impact the content output of other information sources; see Boyle, 2001; Roberts & McCombs, 1994; Trumbo, 1995) may contribute to an even more finely calibrated measure of the importance of different information sources. Thus, as the Commission decides the relative weights to assign broadcast television, versus radio, versus newspapers, the relative importance/impact of these different media may be better captured by not only assessing variations in how and to what extent they are used by the citizenry to perform different functions, but also how and to what extent some media exert significant influence over others. For instance, some scholars have found that daily newspaper coverage appears to be an important factor in determining which stories broadcast news programs devote attention to (Boyle, 2001; Ku, Kaid, & Pfau, 2003; Trumbo, 1995). To the extent that such phenomena may be prevalent at the local level, then a weighting system that assesses the relative importance of different media only via assessing the extent to which consumers report on relying on one versus the other may, in fact, underestimate the full importance of certain information sources.

Another possible avenue of inquiry from an effects standpoint would involve incorporating – and building upon – the extensive literature that has examined the relationship between media usage and civic involvement or political participation. Such an approach would involve conceptualizing the diversity importance of different information sources at least in part in terms of their role in informing and mobilizing the citizenry, and facilitating citizens' involvement with their communities. To the extent that ownership policy is motivated in large part by the diversity and localism principles, and the long-standing relationships between these principles and the effective functioning

of the democratic process (see Federal Communications Commission, 2003), then an analytical approach grounded at least in part in this body of literature would seem to be of significant potential value.

Research on the relationship between media usage and civic involvement and political participation shows, for example, stronger relationships between newspaper consumption and civic involvement/participation than between television news consumption and civic involvement/participation (Shan, McLeod, & Yoon, 2001; see also Jeffres, Dobos, & Sweeney, 1987). Studies also have shown a significant relationship between local media usage and the strength of community ties (Emig, 1995), suggesting that the extent to which an information source is local in its orientation may bear directly on the extent to which it is able to have an impact on civic engagement.

Findings such as these could guide efforts to effectively calibrate the diversity importance of different information sources in a way that considers the extent to which these sources are capable of impacting political and civic involvement/participation at the local level. Moreover, contained within this body of literature may be methodological approaches that could be applied to systematic national or local level assessments of the relationship between the usage of different information sources and their effects on the political behavior variables that presumably underlie policymakers' concerns with preserving diversity and localism in local media markets.

Conclusion

This essay has attempted to explore areas of intersection between existing lines of social science research and the FCC's ongoing efforts to effectively assess viewpoint diversity in local media markets. As this essay has indicated, well-established areas research, such as agenda-setting, uses and gratifications, audience behavior, and media usage and political participation – which traditionally have not had much bearing on communications policy – now appear to be much more

directly relevant to issues and concerns facing policymakers in relation to their work on media ownership.

Ideally, this brief overview will shed light on some areas of research that could help guide policymakers and policy analysts in their decision-making, in their identification of key research questions, and in their conceptualization and design of future research endeavors. Moreover, this overview hopefully will help scholars engaged in the lines of inquiry reviewed here to see more clearly the potentially significant policy ramifications for their work – something they more than likely have not been inclined to focus on in the past. More important, in now thinking this way, ideally these scholars can design studies that more directly address ongoing policy concerns than work in these areas generally has in the past. To the extent that past work in these areas has not been conducted with media policy applications in mind, there likely is substantial potential for researchers in these areas to conduct work that more directly addresses the FCC's media ownership policy concerns and informational needs than the sampling of research discussed in this essay.

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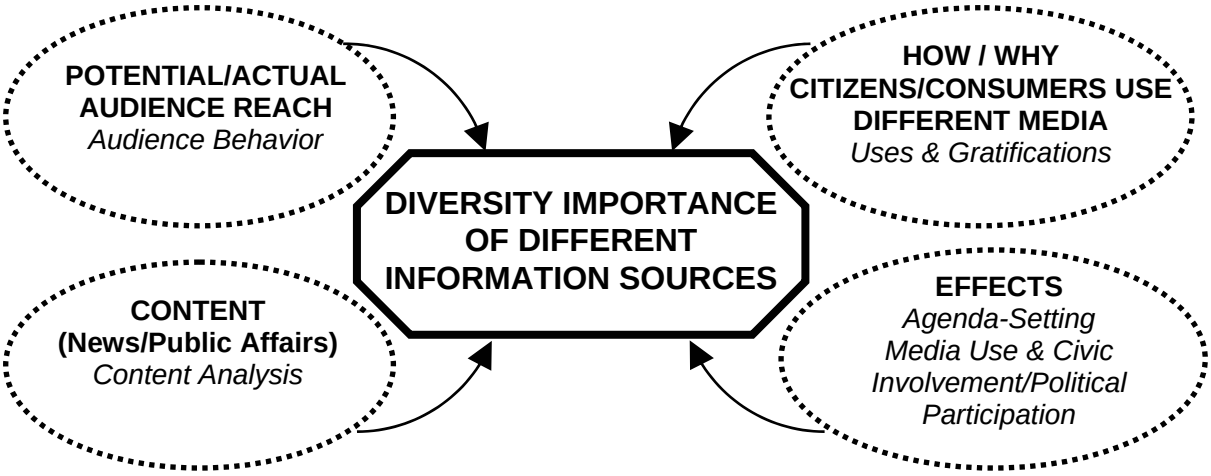
Figure 1: Potential Elements of the "Diversity Importance" of Different Information Sources and Associated Areas of Research.



Endnotes

[1] Magazines were discarded by the Commission as a meaningful source of local news and information on the basis of the data gathered in the Nielsen Media Research (2002) study, as well as on the basis of data from other sources. Cable television was excluded for similar reasons (see Federal Communications Commission, 2003).

[2] In light of the heavy methodological criticisms leveled against the FCC's own effort at content analyzing broadcast stations' news and public affairs programming (Spavins, et al., 2002; for an overview of the specific criticisms, see Napoli, 2004), it would also seem that the content analysis methodology is one in which the Commission could use substantial external guidance and assistance.

[3] For analyses that reach similar conclusions within the narrower context of the provision of public affairs programming, see Napoli (2001) and Yan and Napoli (2004).

[4] In these studies, methods are developed for determining the extent to which local news content is indeed "local" in its orientation, with the results often showing that a large percentage of "local" news does not address stories or issues related to the local community, and in fact has a more national or regional orientation.

[5] This description of the Diversity Index would seem to contradict the Commission's earlier statement that, "Our Diversity Index focuses on availability of sources of local news and current affairs" (Federal Communications Commission, 2003, p. 13780). Usage and availability are very different concepts, and the extent to which the Commission seems to conflate the two suggests that perhaps both concepts should be incorporated into the next iteration of the Diversity Index – and, perhaps more important, that further FCC work in this area should be more thoroughly grounded in the existing research on the production and the consumption of news and public affairs content.

[6] Chaffee and Frank (1997), for instance, illustrate how television and newspapers serve complementary functions in providing political information, and how newspapers primarily serve the more politically active component of the citizenry.

[7] Certainly, there are other potentially relevant bodies of literature relevant to an effects-grounded approach to assessing the diversity importance of different information sources. Space limitations prevent further exploration of these possibilities.