

To the members of the FCC –

On behalf of the Carnegie-Knight Task Force, I am honored to present the following comment on the transparency issue that the FCC has under consideration. The Carnegie-Knight Task Force consists of the dean or director of 12 of the most prominent institutions of journalism education in the nation. The Task Force was created by The Carnegie Corporation of New York and The John S. and James L Knight Foundation for the advancement of journalism. The statement was endorsed by every member of the Carnegie-Knight Task Force, whose names appear below.

--Alex Jones, Director of the Joan Shorenstein Center on the Press, Politics and Public Policy, Harvard Kennedy School

FCC Transparency

Back in the late 1920s and early 1930s, the United States developed a broadcasting system that was distinctively different from other countries' systems. It stands as a prime example of American exceptionalism.

The bargain, first for radio and then for television, was this: the federal government would give private companies broadcast licenses that proved to be immensely valuable, free of charge. In return, the companies would have to fulfill public-service requirements to a greater extent than companies that were not so dependent on a government benefit. This system was an alternative to the government's keeping the broadcast spectrum for itself and operating its own system, as the United Kingdom did in creating the British Broadcasting Corporation. This country did not have any public broadcasting until decades later.

Government regulation of broadcasting was never terribly strict—there have only been four revocations of station licenses in the nearly 80-year history of the Federal Communications Commission—but it helped to incentivize the creation of broadcast news, and it hardly prevented broadcasting from

becoming a highly profitable industry. But in recent years, the public-service requirements on broadcasters have dwindled to nearly nothing.

The FCC is now proposing new transparency regulations for holders of its broadcast licenses, and we, as deans of some of the nation's leading journalism schools, are responding to the FCC's request for comments on these regulations by offering our strong support for them.

The transparency regulations require local television and radio stations to put online material that they are already required to gather and to make available to the public. They represent in a specific instance the overall spirit of the current FCC, which has not chosen to try to reinstitute strict regulation of broadcasting content, but, instead, has strongly promoted the use of the Internet to give citizens access to information.

Today, taking advantage of the FCC's current transparency regulations requires physically traveling from station to station and looking at the records they are required to keep. This logistical difficulty ensures that there is not much robust public discussion of what the stations' records, in the aggregate, would show. Two areas are especially important: information about who is paying how much for broadcast political advertising, and information about unannounced financial sponsorships of segments of news programs.

Most of the broadcast industry is opposing the new transparency regulations. This is understandable as a reflexive impulse, but it's still disappointing. Broadcast news organizations depend on, and consistently call for, robust open-record regimes for the institutions they cover; it seems hypocritical for broadcasters to oppose applying the same principle to themselves. The stations' public "political file" contains vital information about the American political system, since so much of the money in politics goes toward the purchase of broadcast advertising, and the sponsorship information can help make viewers aware that some of what they are seeing and hearing on the air, especially in the realm of health news, is being paid for by highly interested parties.

It won't impose a crushing burden on the stations if they have to put information they already have online, and it will greatly enhance the public's knowledge if it becomes possible to see online the kind of information the regulations affect. We strongly urge the FCC to implement the proposed regulations.

Arizona State University, College of Communication, Christopher Callahan,
Dean

Columbia University, Graduate School of Journalism, Nicholas Lemann,
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Harvard University, Joan Shorenstein Center on the Press, Politics, and Public
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