NEWSPAPER-TELEVISION STATION CROSS-OWNERSHIP: OPTIONS FOR FEDERAL ACTION

PREPARED UNDER A GRANT FROM
THE JOHN AND MARY R. MARKLE FOUNDATION

WALTER S. BAER, HENRY GELLER
JOSEPH A. GRUNDFEST

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SEPTEMBER 1974

Rand
SANTA MONICA, CA. 90406

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PREFACE

Common ownership of two or more different media outlets in the same community is an issue of much current concern. The Federal Communications Commission (FCC) is now considering, in its Docket No. 18110, the so-called "one-to-a-market" inquiry: whether to prohibit local cross-ownership of daily newspapers and television stations. This report addresses the subject of that inquiry. It draws upon information and materials gathered in a parallel Rand study that assesses the current state of knowledge regarding concentration of media ownership and control.[1]

Under a grant from the National Science Foundation, Rand has assessed the research literature and other writings dealing with the ownership and control of radio, television, cable communications, and newspapers. Many issues concerning media ownership are now in the public arena, and discussions about them often become heated debates. In this highly charged atmosphere, Rand considered it important to sift the research literature systematically to determine what factual evidence there is on the effects of media ownership and its relevance to present government policies. The results of that assessment appear in the companion study mentioned above.

This report draws heavily from the materials assessed in the larger study. In particular, it is based on an evaluation of the several hundred comments, analyses, studies, and other filings in FCC Docket No. 18110. The results of the assessment are summarized in this report; the individual studies are treated in the companion report.

Extending beyond the assessment of prior studies of cross-ownership, this report outlines the major options available to the FCC in resolving the cross-ownership issue, and the implications of

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[1] Walter S. Baer, Henry Geller, Joseph A. Grundfest, and Karen Possner, *Concentration of Mass Media Ownership: Assessing the State of Current Knowledge*, The Rand Corporation, R-1584-NSF, September 1974.

adopting the various options. It presents detailed tables listing the media competition facing newspaper-television station combinations in the United States, and discusses several alternative ways to measure the extent of such media competition. The report is directed primarily to government officials in the FCC, the Justice Department, and other agencies; to those in the publishing and broadcasting businesses whose interests are affected by the cross-ownership issue; to the several citizen groups that have raised concerns about local media concentration resulting from cross-ownership; and to other concerned citizens. Economists and other researchers who want to dig more deeply into the data and methodologies underlying the analysis of cross-ownership should turn to the more detailed assessment contained in the companion report.

This report was written with the support of the John and Mary R. Markle Foundation under a grant to Rand's Communications Policy Program, and as stated above, draws in large part on the knowledge and materials accumulated under the assessment supported by the National Science Foundation. The authors gratefully acknowledge support from both institutions. Several members of the FCC staff gave freely of their time in discussing these issues with us and critiquing our early results; they include Alex Korn, Barry Cole, James Hobson, Lise Courtney Howe, Alan Pearce, and Stanley Wiggins. The authors also appreciate the helpful suggestions and comments from Rand colleagues and consultants Stanley Besen, Anne Branscomb, Bryan Ellickson, Leland Johnson, and Karen Possner; from members of the Advisory Committee to the Communications Policy Program, including Elie Abel, Albert Casey, Kenneth Cox, Sidney Dean, Jr., Carl McCall, William Meckling, Newton Minow, Leonard Reinsch, and Frank Stanton; and from Steven Barnett, Harvey Levin, and Bruce Owen, who have contributed substantially to knowledge in this field. None of them, of course, bears responsibility for any errors of fact or interpretation.

SUMMARY

Maintaining a diversity of information sources available to the public is a fundamental policy objective under the First Amendment to the U.S. Constitution. Preventing undue economic concentration of media ownership goes hand in hand with preserving the marketplace of ideas. In support of these objectives, the Federal Communications Commission (FCC) is currently considering a proposed rule that would prohibit the common ownership of a daily newspaper and a television station in the same market. The Antitrust Division of the Department of Justice also has filed petitions to deny license renewals to several television stations owned by newspapers. In contrast, the Broadcast License Renewal Act now pending before the Senate would foreclose FCC consideration of cross-ownership issues at license renewal time.

As of July 1974, 79 pairs of daily newspapers and television stations licensed within the same metropolitan area were under common ownership. More than 90 percent of these cross-owned television stations have the advantages of network affiliation and VHF frequency assignments--chiefly because they were among the first television stations licensed in their communities.

An assessment of the arguments for and against newspaper-television station cross-ownership results in a Scotch verdict: "Not proved." The evidence--including studies of advertising rates and program content--supports neither allegations of substantial harm nor those of substantial public benefits from newspaper-television combinations. Proponents of a divestiture rule argue that, without a showing of clear benefits from cross-ownership, combinations should be broken up in order to diversify the sources of local news and opinion. Opponents argue that without clear demonstrations of harm, the present ownership structure should continue. Consequently, legal and regulatory judgments hinge on the question of who bears the burden of proof. At this time neither side seems able to shoulder that burden.

The FCC has six principal options for resolving the cross-ownership issue:

1. To adopt a rule banning future newspaper-television combinations in the same community, but leaving present combinations intact;
2. To adopt a rule not only banning newspaper-television combinations in the future, but requiring divestiture of existing combinations over an appropriate period;
3. To adopt a rule requiring divestiture only in highly concentrated markets;
4. To terminate the rulemaking and proceed on a case-by-case basis, examining present and prospective combinations in terms of news and advertising concentration in their local markets;
5. To proceed on a case-by-case basis only when egregious concentration, abuses, or predatory practices have been shown to occur;
6. To examine combinations through the comparative hearing renewal process.

Attempts to define a threshold of "undue concentration," or to distinguish the more concentrated combinations from the less concentrated, depend critically on the definer's choices of geographic market and media competitors. The appropriate market definition rests in large part on whether one is concerned with competition in news and advertising at the local, the regional, or the national level. If regional and national competition is the chief concern, the broadcast station grade B contour or "area of dominant influence" is a reasonable area in which to measure competition. If the chief concern is competition in local advertising and local information sources, reflecting the FCC's longstanding emphasis on local broadcast service, then the city, county, or SMSA is a better choice.

The most difficult decision facing the FCC is whether to issue a rule requiring divestiture of some or all newspaper-television combinations. The Commission seems unlikely to require complete divestiture, even though procedurally that might be the simplest approach. Instead it might prefer to make a rule barring future combinations and requiring present combinations to maintain separate newspaper and television operations. Other cases of undue concentration or abuses from present combinations would be dealt with on an ad hoc basis. Enactment of the Broadcast License Renewal Act, however, would prohibit the FCC from considering the cross-ownership issue at renewal time, which is the most natural ad hoc procedure. Antitrust action in the courts would then be the only remaining ad hoc recourse.

An FCC rule that prohibited future combinations and spelled out criteria for determining undue concentration and monopoly abuses requiring divestiture would meet the intent of the Broadcast License Renewal Act and set clear, uniform standards for the broadcast industry. Any such rule should be simple to apply and interpret. As one example, a rule might require divestiture of the 17 combinations that face no daily newspaper or television station competition within their local markets. In adopting any rule in this area, policymakers must weigh the desirability of diversifying sources of information against possible harm to the public from industry disruption and some decrease in local ownership.

CONTENTS

I. GOVERNMENT CONCERN WITH MEDIA CROSS-OWNERSHIP[1]

Established media interests respond quickly when technology opens up a new medium of mass communications. They have the most to gain or lose. Newspapers were among the first to develop radio stations in the 1920s and to purchase stations in the 1930s; AM radio license-holders moved into FM and television when those services were developed; and both print and broadcast media owners invested in cable television in its early years. Like other businessmen, media owners move into allied fields to seize new business opportunities and to protect themselves against competition. In many cases, they also believe their media experience makes them best qualified to develop a new communication channel to serve the public interest.

To protect the public interest, on the other hand, diversification of information sources available to the public is a fundamental policy objective of the United States Government. Although the First Amendment to the Constitution prohibits direct federal regulation of print media ownership, the Federal Communications Commission (FCC) has the power under the Communications Act of 1934 to regulate ownership in the electronic media. The FCC issues broadcast station licenses and cable television certificates of compliance. It has set maximum limits on the number of radio and television stations a single enterprise can own.[2] It has prohibited ownership of two or more broadcast outlets of the same service (AM, FM, or TV) in the same market.[3] And it is now considering the question of common ownership of two or more different media outlets in the same community--the "cross-ownership" issue.

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[1]This introductory section is adapted from pages 19-25 of the companion report, R-1584-NSF, to enable the present report to be self-contained.

[2]18 FCC 288 (1953).

[3]Section 73.35, 8 F.R. 16065 (1943); Secs. 73.236(a) and 73.636(a), 47 C.F.R.

Newspaper control of broadcast facilities poses the principal cross-ownership problem. Although the FCC has no concern with newspapers as such, it has long recognized that common ownership of a daily newspaper and a broadcast station in the same market reduces competition in the dissemination of news and information at the local level, as well as reducing the competition for local advertising. Consequently, media cross-ownership has entered as a negative factor in comparative hearings to choose among competing applicants for a broadcast station license.[1] As a former FCC chairman describes the process, ". . . a newspaper applicant [comes] to bat with at least one strike on him and maybe two, depending on the size of the market and the character of the competing applicants."[2] A study of 16 comparative hearings for television licenses held from 1967 to 1970 confirms that the Commission favored applicants who had no newspaper connections.[3] The FCC's diversification policy has been directly sustained upon review.[4]

The most publicized recent example is the WHDH case, in which a television license originally granted to a newspaper applicant in 1957 was denied renewal in 1969 after nearly ten years of FCC hearings and litigation.[5] The applicant then ceased operating the newspaper. Although the WHDH decision involved *ex parte* attempts to influence

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[1] Prior to 1961 the FCC did not maintain a consistent policy toward newspaper ownership as a factor in comparative hearings. See H. Friendly, *The Federal Administrative Agencies*, Harvard University Press, Cambridge, Mass., 1962, pp. 63-70.

[2] Paul Porter, quoted in Harry S. Ashmore, *Fear in the Air--Broadcasting and the First Amendment: The Anatomy of a Constitutional Crisis*, W. W. Norton and Co., New York, 1973.

[3] Roger G. Noll, Morton J. Peck, and John J. McGowan, *Economic Aspects of Television Regulation*, The Brookings Institution, Washington, D.C., 1973, pp. 112-116.

[4] *Plains Radio Broadcasting Co. v. Federal Communications Commission*, 85 U.S. App. DC 48, 52, 175 F. 2d 359, 363; *Scripps-Howard Radio, Inc. v. Federal Communications Commission*, U.S. App. DC 13, 189 F. 2d 677, *cert. denied*, 342 U.S. 830.

[5] 16 FCC 2d 1 (1969), affirmed *Greater Boston Television v. FCC*, 444 2d 841 (DC Cir. 1970), *cert. denied*, 402 U.S. 1007 (1970).

the FCC and thus fell outside the typical renewal process, broadcasters viewed it as a direct threat to break up newspaper-television combinations through the license renewal process. This industry concern is reflected in legislation now before the Congress (and discussed below) that would bar consideration of cross-ownership issues at license renewal time.

The FCC has never found it necessary or desirable to bar newspapers as a class from broadcast ownership. After a lengthy investigation of newspaper ownership in the 1940s,[1] the Commission concluded that because of the "grave legal and policy question involved," it would continue to review newspaper applications on a case-by-case basis.[2] No rule was issued, in part because the evidence in the newspaper investigation did not point to the need for such a rule, and also because of a court decision stating that the Commission lacked the power to issue a rule excluding newspaper ownership.[3] Since that time, moreover, Congress has repeatedly indicated its intent that the FCC not adopt any rule prohibiting newspapers as a class from owning broadcast properties.[4] Consequently, the issue today is not whether to bar newspaper ownership of broadcast stations or cable systems per se, but whether to proscribe cross-ownership in the same geographic area.

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[1] FCC Docket No. 6051 (1941).

[2] 9 Fed. Reg. 702 (1944).

[3] The Court stated, in *Stahlman v. Federal Communications Commission,* 75 U.S. App. DC 176, 126 F. 2d 124, where a Commission subpoena in the newspaper investigation was upheld, that while the Commission could consider in the licensing process the effect upon the public interest of joint ownership of newspapers and radio stations, it could not bar newspapers as a class. The Court stated (75 U.S. App. DC 180, 126 F. 2d 128), ". . . it was nevertheless within the administrative powers of the Commission to initiate the proposed investigation for the purpose of ascertaining the facts for its guidance in making reasonable and proper public rules, for application to existing stations, and in the consideration of future requests."

[4] See, for example, S. 1333, 80th Cong., 1st Sess.; S. 1973, 81st Cong., 1st Sess.; H.R. 6968 and H.R. 6977, 84th Cong., 1st Sess.

The One-to-a-Market Proceeding

On March 27, 1968, the FCC adopted a Notice of Proposed Rulemaking[1] inviting comments on a proposal to amend its multiple ownership rules so as to prevent common ownership, operation, or control of more than one unlimited-time AM, FM, or TV broadcast station in a market. The proposal would not require divestiture by any licensee of existing facilities. It would apply to all applications for new stations and to all other applications for assignment of license or transfer of control.

On April 6, 1970, the FCC issued its First Report and Order in Docket No. 18110, adopting the foregoing proposal.[2] At the same time the FCC also issued its Further Notice in 18110, proposing divestiture, within five years, to reduce holdings in any market to one or more daily newspapers, or one television broadcast station, or one AM-FM combination.[3] This proposal came principally as a result of the prior filings of the Antitrust Division of the Department of Justice strongly recommending newspaper divestiture.[4] Under the provisions of the proposed rules, if a broadcast station licensee were to purchase one or more daily newspapers in the same market, it would be required to dispose of any broadcast stations that it owned there within one year or by the time of its next renewal date, whichever were longer. No grants for broadcast station licenses would be made to owners of one or more daily newspapers in the same market.[5]

Comments and reply comments have been filed with the FCC, and the matter has been ripe for further consideration since August 19, 1971. In the meantime, the FCC has continued to act on an ad hoc

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[1] FCC 68-332, 33 F.R. 5315, April 3, 1968.

[2] 35 F.R. 5948.

[3] The Commission modified its rule in 1971 to allow joint ownership of an AM and FM broadcast station in the same market. It has recently proposed a rule that would require more nonduplicated programming by AM-FM combinations. See 28 FCC 2d 662, 671-2 (1971); FCC 14-381 (1974).

[4] For a discussion of the role of the Antitrust Division vis-a-vis the FCC in fostering diversification of ownership, see the companion report, R-1584-NSF.

[5] FCC 70-311; 22 FCC 2d 339 (1970).

basis. Several petitions to deny television license renewal have raised questions of concentration. In one case the FCC designated the renewal for hearing. The Department of Justice had intervened in the case to support the petitioner, and the concentration was clear (the only newspaper in Cheyenne, Wyoming, owned the only television station, the only cable system, one of the two FM stations, and one of the four AM stations).[1] But the pattern of FCC action has generally been to deny such petitions on the ground that the concentration issue should be dealt with in the general rulemaking proceeding in Docket No. 18110 rather than on an ad hoc basis.[2] And the courts have affirmed the Commission practice of deferring consideration of this issue until resolution of the rulemaking proceeding.[3] In the most recent such case, *Columbus Broadcasting Coalition v. FCC*, decided June 28, 1974, the Court stated:

> . . . While four years might be characterized as an excessive period for a rulemaking, we realize that concentration of control is an extremely complex question. The Coalition does not allege bad faith or purposefully dilatory proceedings by the Commission. If we are to encourage the Commission to proceed by rulemaking for basic policy changes [case citation omitted], we must necessarily be patient. We are not, at this time, prepared to say that the Commission has acted improperly by not terminating the rulemaking proceeding and

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[1]See *Frontier Broadcasting Company*, 21 FCC 2d 570. The case was later resolved by Frontier's sale of the TV station--27 FCC 2d 486; 35 FCC 2d 875.

[2]E.g., *Scripps-Howard Broadcasting Company*, 31 FCC 2d 1090, 1103 (1971).

[3]*Stone v. FCC*, 466 F. 2d 316, 331 (D.C. Cir. 1972); *Hale v. FCC*, 425 F. 2d 556, 560 (D.C. Cir. 1970). Thus, in the latter case, the Court stated: "There is a rational foundation for the Commission's position that a basic change in policy such as appellants here seek is better and more fairly examined and considered in rule making proceedings, where the inquiry can be thorough and where all interested parties can participate . . ." And the concurring opinion stressed that: "[t]oday I cast my vote with the majority solely because the Federal Communications Commission is currently undertaking a comprehensive review of its doctrines governing concentration of control in the mass media."

> announcing its new rules before now. We, of course, encourage the Commission to act expeditiously in this rulemaking and reserve the question of at what point a continuing failure to act could be the basis for a different conclusion. . . .[1]

Antitrust and Congressional Actions

The Antitrust Division, after largely instigating the FCC's proposed newspaper divestiture rules, also moved independently as a result of the Commission's delay. On January 2, 1974, Antitrust filed petitions to deny license renewals to four television stations owned by newspapers in St. Louis, Minneapolis, and Des Moines.[2] It has since filed similar petitions in Milwaukee and Topeka, and still other cities are reported to be under review.[3] The Antitrust petitions argue for denial on the basis of undue economic concentration in local advertising in these cities. The petitions do not emphasize diversification of information sources.

The 1974 Broadcast License Renewal Act, passed by the U.S. House of Representatives and now pending before the Senate, proposes to move in the opposite direction from Antitrust's actions. Reflecting concern over the 1969 WHDH denial, it would foreclose FCC consideration of cross-ownership issues at license renewal time. Section 2(b) of the bill provides:

> . . . In considering any application for renewal of a broadcast license granted under subsection (a), the commission shall not consider--
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> (i) the ownership interests or official connections of the applicant in other stations or other communications media or other businesses . . . unless the

[1] *Columbus Broadcasting Coalition v. FCC*, case No. 73-1074 (D.C. Cir. 1973), Sl. Op., p. 8.

[2] See, e.g., Petition of the Department of Justice to Deny Renewal Applications in the Matter of Pulitzer Publishing Co., FCC BRCT-30, filed January 2, 1974; Petition of the Department of Justice to Deny Renewal Application in the Matter of Cowles Communications, Inc., Des Moines, Iowa, FCC File No. BR-515, January 2, 1974.

[3] *Broadcasting*, March 11, 1974.

> commission has adopted rules prohibiting such ownership interests or activities . . . and given the renewal applicant a reasonable opportunity to conform with such rules . . .[1]

The provision, if enacted, would appear to bar FCC consideration of any ad hoc renewal case, such as *Frontier* or those recently brought by the Antitrust Division. It would apply to all renewals, not solely to comparative hearings such as WHDH. Consequently, unless the FCC issued a rule requiring divestiture, all existing newspaper-television combinations would be insulated from attack through the renewal process.

The reasoning behind the bill is stated in the House Committee report:

> The Committee wishes to emphasize its view that the public interest requires the elimination of the application of the issues of so-called cross-ownership and integration of ownership and management from comparative renewal hearings on a case-by-case basis where meritorious renewal applicants are involved. This is not to suggest, in the slightest way, that the Commission should be less vigilant in avoiding undue concentrations of control or less vigorous in effectively promoting diversification of broadcast service.
>
> . . . Such worthy objectives, while the responsibility of the Commission, *should not be undertaken on a case-by-case basis, but by rulemaking* in which the social, economic and political benefits and disadvantages which may flow from such a modification of the industry may fully be considered. (Emphasis added.)[2]

The bill also would require the FCC to complete action on Docket No. 18110 within six months after its enactment. Consequently, the confluence of Congressional, court, and Antitrust Division pressures may force the FCC to act during 1974 or early 1975.

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[1] House of Representatives, Report of the Committee on Interstate and Foreign Commerce on HR 12993, H. Rept., 93-961.

[2] Ibid., p. 10.

II. EXTENT OF NEWSPAPER-TELEVISION STATION CROSS-OWNERSHIP

Joint ownership of a daily newspaper and a television station in the same market constitutes the major issue in Docket No. 18110, as the Commission stated in its further notice:

> In view of the primary position of the daily newspaper of general circulation and the television broadcast station as sources of news and other information, and discussion of public affairs, particularly with respect to local matters, it is not desirable that these two organs of mass communication should be under the same control in any community. A direct parallel would be the ownership of two television stations in the same community by the same person, which the Commission without substantial disagreement from any source, has never permitted. The functions of newspapers and television stations as journalists are so similar that their joint ownership is, in this respect, essentially the same as the joint ownership of two television stations.[1]

As of July 1974, 79 pairs of daily newspapers and television stations licensed within the same metropolitan area were under common ownership, and one additional newspaper held a television station construction permit in its home city. These combinations are listed in Table 7 in the Appendix. Most of the 79 cross-owned television stations now in operation are VHF network affiliates. Only five are independent stations; only six have UHF frequency assignments. With these advantages, newspaper-owned stations are generally considered to be among the most profitable television outlets.[2]

CONCENTRATION RESULTING FROM NEWSPAPER-TELEVISION STATION CROSS-OWNERSHIP

By definition, cross-ownership increases media concentration by

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[1] FCC 70-311 (1970).

[2] Newspaper-owned television stations accounted for 18 percent of average daily audience in the United States in 1972, although they made up only 11 percent of U.S. stations. Station audience is well

reducing the number of separately owned media outlets in a market. But determining how much concentration results from a newspaper-television station combination requires definitions of the relevant competition and the appropriate geographic market. The following discussion outlines several measures of local media concentration, drawing upon Tables 8 and 9 of the Appendix, which present data on newspaper and television station competition to the 79 existing combinations. Data are compiled for four possible market definitions: (1) the city in which the newspaper is published; (2) the county in which the combination is located; (3) the Standard Metropolitan Statistical Area (SMSA); and (4) the "area of dominant influence" (ADI).[1] Grade A or grade B television contours also represent possible market definitions, although they make direct comparisons of newspaper and television station penetration more difficult.

Counting Competitors

One way to measure concentration is simply to count the number of competing daily newspapers and television stations that combinations face in their home cities, as in Table 1. For example, 16 combinations have no competition at all; 14 more have no newspaper competition and only one local television competitor.

Media owners argue that the relevant market should be broadened from the city in which the combination is located to the corresponding SMSA or ADI. Broadening the market obviously increases the count of competing newspapers and television stations. Tables 2 and 3 show the distribution of combinations by the number of competing newspapers and television stations within the SMSA and ADI, respectively. Of the 16 combinations with no local newspaper or television competition, only

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correlated with advertising revenue; see, for example, R. E. Park, *Potential Impact of Cable Growth on Television Broadcasting*, The Rand Corporation, R-587-FF, October 1970.

[1]ADIs are defined by the American Research Bureau, a commercial firm in the business of measuring television audiences. Each of the 3100 counties in the United States is assigned to one of the approximately 205 ADI markets, based on the location of the television stations viewed the most in that county. An ADI is larger than the corresponding metropolitan area, or SMSA.

Table 1

DISTRIBUTION OF NEWSPAPER-TELEVISION
COMBINATIONS BY LOCAL COMPETITION

Number of Competitive Commercial TV Stations in City	Number of Competitive Daily Newspapers in City			Total Number of Combinations
	0	1	2 or More	
0	16	1	0	17
1	14	0	0	14
2	20	3	0	23
3	5	8	0	13
4	2	6	0	8
5 or more	1	0	3	4
Total number of combinations	58	18	3	79

SOURCES: *TV Factbook*, 1973-74 edition; *Circulation '73/'74*.

Table 2

DISTRIBUTION OF NEWSPAPER-TELEVISION COMBINATIONS
BY COMPETITION WITHIN SMSA

Number of Competitive Commercial TV Stations in SMSA	Number of Competitive Daily Newspapers in SMSA						Total Number or Combinations
	0	1	2	3	4	5 or More	
0	10	4	0	0	0	0	14
1	8	4	0	0	0	0	12
2	11	7	2	5	1	1	27
3	2	4	3	1	1	0	11
4	0	0	2	2	1	3	8
5 or more	0	0	0	0	0	7	7
Total number of combinations	31	19	7	8	3	11	79

SOURCES: *TV Factbook*, 1973-74 edition; *Circulation '73/'74*.
NOTE: Home county data are used for cities that are not located within SMSAs.

Table 3

DISTRIBUTION OF NEWSPAPER-TELEVISION COMBINATIONS
BY COMPETITION WITHIN ADI

Number of Competitive Commercial TV Stations in ADI	Number of Competitive Daily Newspapers in ADI						Total Number of Combinations
	0	1	2	3	4	5 or More	
0	2	2	0	0	0	0	4
1	1	1	0	1	1	2	6
2	0	1	2	3	4	19	29
3	0	1	0	3	0	12	16
4	0	0	0	0	0	10	10
5 or more	0	0	0	0	0	14	14
Total number of combinations	3	5	2	7	5	57	79

SOURCES: *TV Factbook*, 1973-74 edition; *Circulation '73/'74*.

10 escape such competition within their SMSA,[1] and only 2--Anniston, Alabama, and Columbus, Mississippi--face no competitors within their ADI. Similarly, the number of combinations facing no newspaper competition and only one competing TV station drops from 14 in the home city to 8 in the SMSA to 1 in the ADI.

Measuring Market Shares

Simply counting the number of competing newspapers and TV stations in the above tables, however, fails to distinguish between strong and weak competitors. For example, one might think it wise to ignore newspaper-owned, nonnetwork UHF stations in intermixed markets,[2] since those stations command considerably smaller audiences and advertising shares than network affiliated VHF stations. A more straightforward approach, however, is to measure audience and circulation shares directly for newspaper-television combinations. That is done in Fig. 1, which plots data from Tables 8 and 9 of the Appendix. Each point represents a newspaper-television combination, with the horizontal axis indicating percentage of daily newspaper circulation among newspapers published in the city, and the vertical axis indicating TV audience share during prime time among television stations licensed in the city.[3]

The figure shows a large grouping of combinations along the right-hand axis--representing monopoly dailies--with television prime time shares ranging from 25 to 100 percent. The 17 points in the upper right-hand corner depict combinations with more than 95 percent of both newspaper circulation and television audience share among media outlets in the city.[4] The dashed lines in Fig. 1 enclose the 28 combinations

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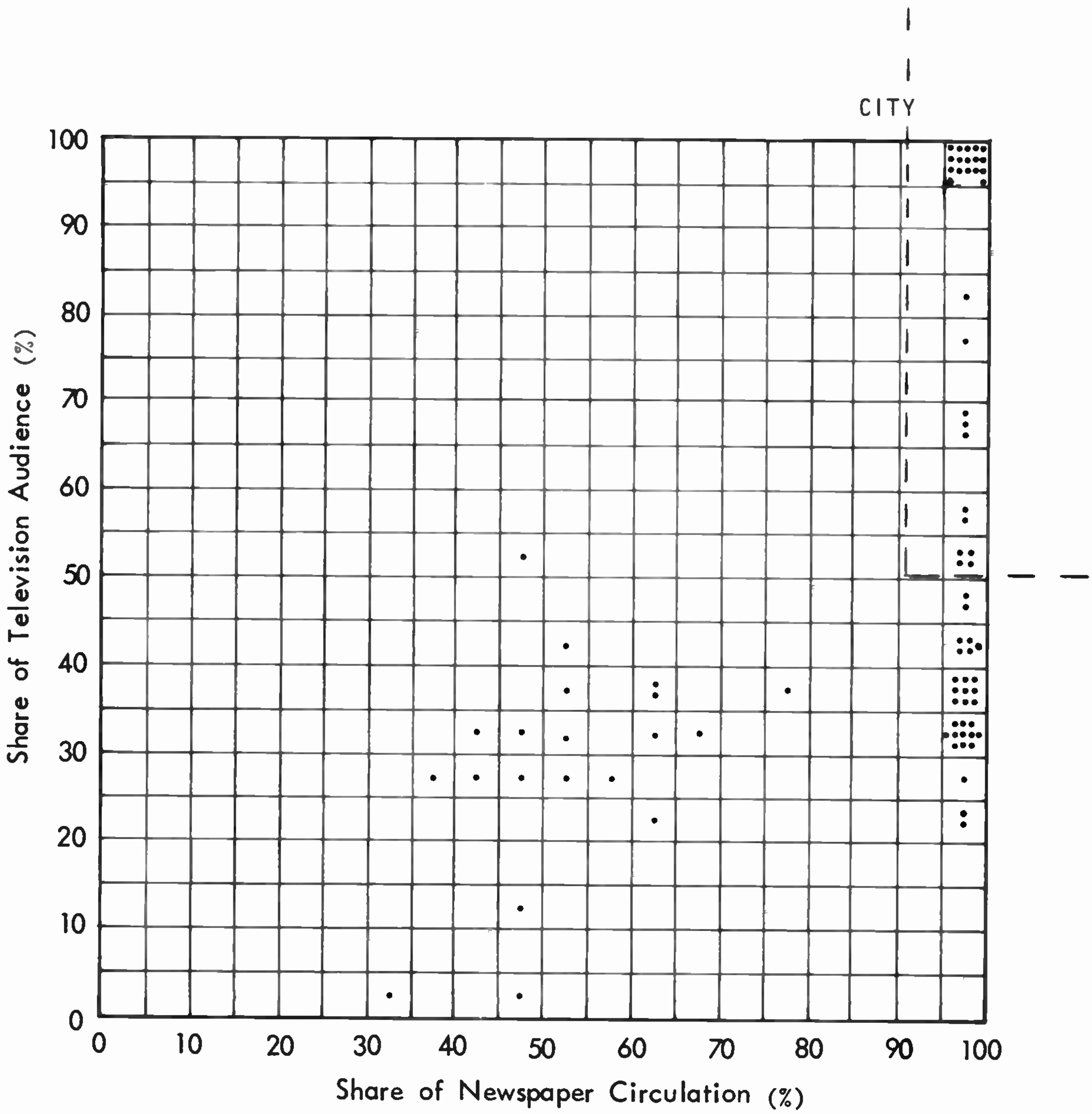
[1] County data are used for cities too small to have defined SMSAs.

[2] WFLD-Chicago and the construction permit held for KHBC-Denver are the only present examples.

[3] One might prefer to use audience shares during evening news shows (at 6:00 and 11:00 p.m.) but the results would not differ significantly from those plotted using average prime time shares.

[4] Note that this includes one combination--Meridian, Mississippi--that does not have a newspaper-television station monopoly, but whose competitive TV station captures a very small audience share.



SOURCES: *Circulation '73/'74; Arbitron Share of Hours Study, 1973 County Report.* Combinations' shares are calculated as a percentage of shares of newspapers published and TV stations licensed within the city.

Fig. 1--Distribution of newspaper-television combinations by their circulation and audience shares within the home city

with greater than 90 percent newspaper circulation share and 50 percent TV audience share among local dailies and television stations. These criteria correspond roughly to the monopoly newspaper and 2 or fewer local television station situations described above.

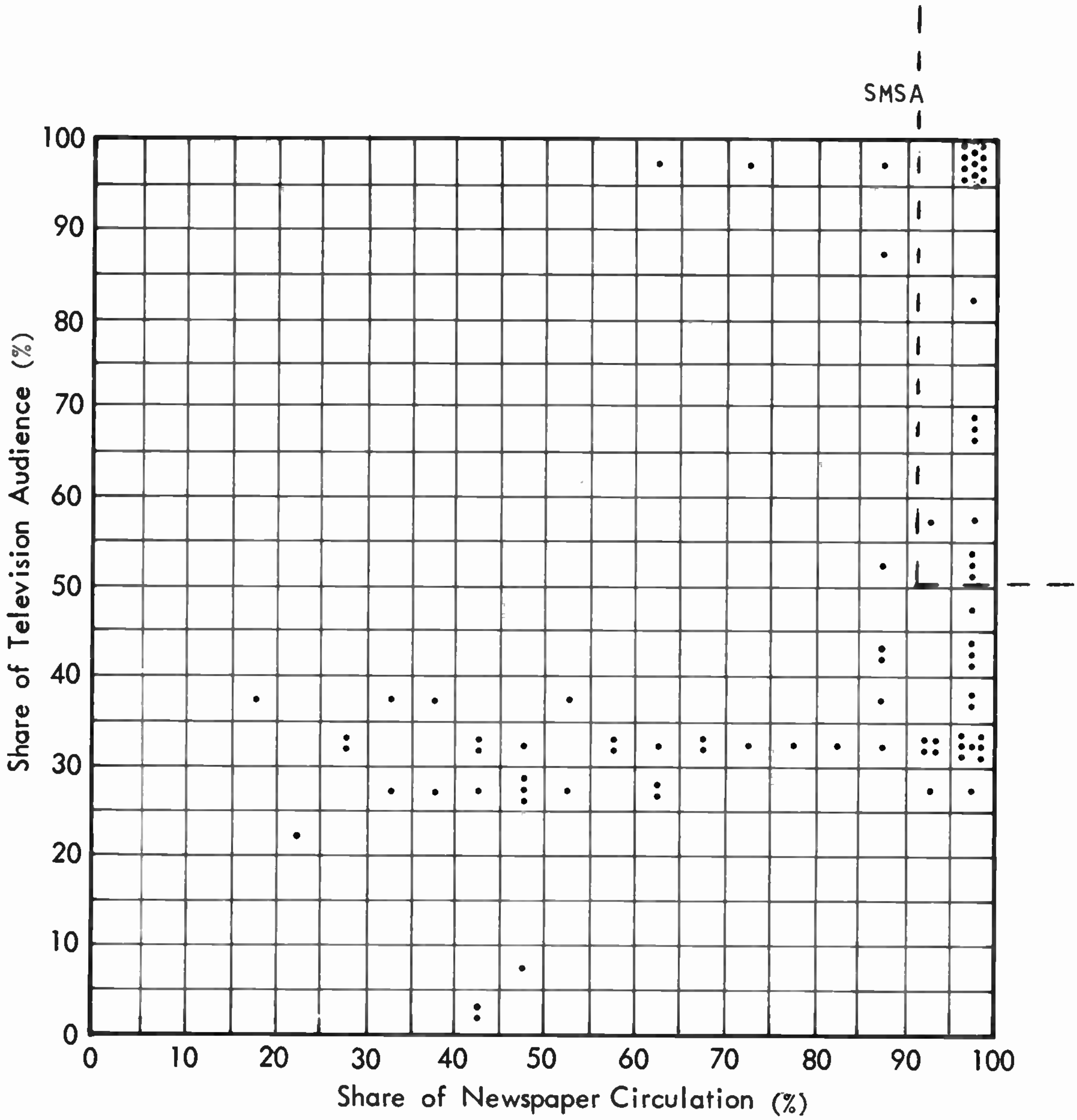
When the larger SMSA or ADI is chosen as the relevant market, as in Figs. 2 and 3, the results again are quite different. The number of combinations with greater than 90 percent newspaper circulation share and 50 percent TV audience share falls from 28 in the city to 20 in the SMSA to 3 in the ADI.

Constructing a Concentration Index

Two commentators in Docket No. 18110 have sought to develop a single index of local media concentration that would reflect the relative importance of jointly owned newspapers, television, and radio stations as information sources. The principal problem is how to assign weights to the various media. For example, De Jonckheere used studies finding that newspapers and television are about equally influential as news sources, and that radio is roughly half as influential as the other two.[1] He therefore assigned weights of 40, 40, and 20, respectively, to all daily newspapers, all television stations, and all radio stations in a community. The weights are then apportioned among media outlets; each newspaper's share of circulation of all local daily newspapers is multiplied by 40 percent; each television station's audience share is multiplied by 40 percent; and the radio stations are assumed to divide the 20 percent weight equally. While De Jonckheere appeals to what seems to be unnecessarily complex probability theory, the weighting scheme he proposes can be used more simply to arrive at a measure of concentration for each newspaper-television combination. Table 4 summarizes the results of doing so. Of the 79 combinations, 58 have De Jonckheere indexes above 50 percent in their home cities.

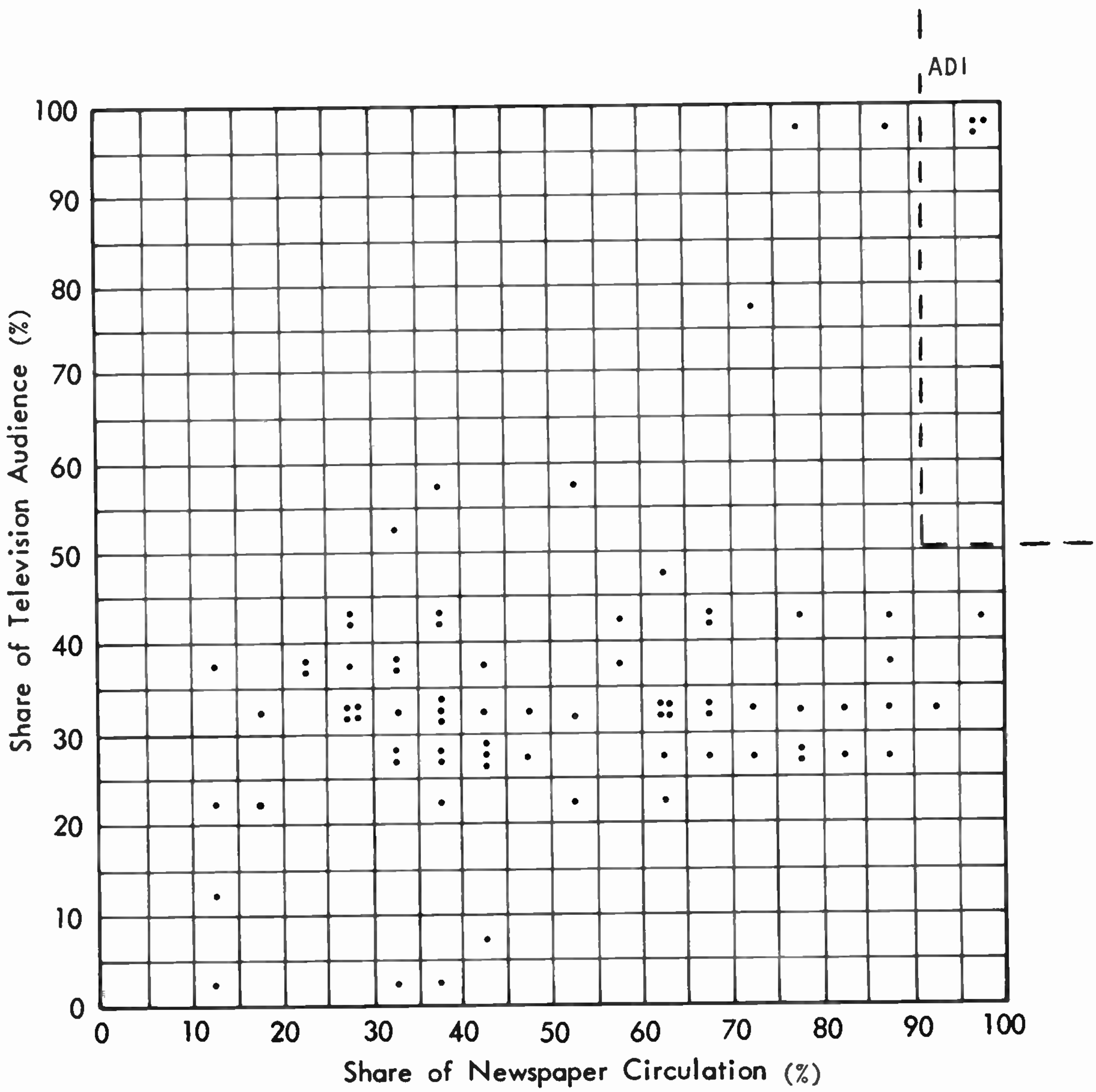
Similarly, Litwin and Wroth's study for the National Association of Broadcasters surveyed twelve prior studies of the relative influence

[1] Comments of T. M. de Jonckheere in re Docket No. 18110, April 1971.



SOURCES: *Circulation '73/'74; Arbitron Day-Part Audience Summary*, November 1973. Combinations' shares are calculated as a percentage of shares of newspapers published and TV stations licensed within the SMSA.

Fig. 2--Distribution of newspaper-television combinations by their circulation and audience shares within the SMSA



SOURCES: *Circulation '73/'74; Arbitron Day-Part Audience Summary*, November 1973. Combinations' shares are calculated as a percentage of shares of newspapers published and TV stations licensed within the ADI.

Fig. 3--Distribution of newspaper-television combinations by their circulation and audience shares within the ADI

Table 4

DISTRIBUTION OF DE JONCKHEERE CONCENTRATION INDEXES
FOR NEWSPAPER-TELEVISION COMBINATIONS
IN THEIR HOME CITIES

Index for Home City	Number of Combinations	Cumulative Number of Combinations
91-100	3	3
81-90	13	16
71-80	8	24
61-70	10	34
51-60	24	58
41-50	6	64
31-40	9	73
21-30	5	78
11-20	1	79
1-10	0	79

of various media.[1] They averaged those studies' results to arrive at a television weight of 44 percent, a newspaper weight of 39 percent, and a radio weight of 17 percent. Like the De Jonckheere scheme, these weightings are not based on any behavioral model or other theory of media influence. They simply reflect survey data. Indeed, other weightings based on more recent media surveys could be used. The latest (1972) Roper data concerning the media sources from which people receive the most news and information would give television, newspaper, and radio weights of 47, 37, 16. The 1972 Roper data concerning relative "believability" of the media would give television, newspaper, and radio weights of 62, 28, 10.

Without a better model to which to relate them, these weighting schemes must necessarily be based on rough judgments. Consequently, the computation of a single concentration "index" seems to introduce more complexity than insight. For the sake of comparison with other approaches, however, the results of applying these various weighting schemes to newspaper-television combinations are presented in Table 10 of the Appendix. The indexes in Table 10 certainly should not be taken as representing precise measures of media concentration, but like the simpler approaches described above, they may serve to distinguish highly concentrated markets from less concentrated ones in terms of media sources of news and opinion.

Other Approaches

The methods described above focus entirely on daily newspapers, television, and radio stations as the dominant local outlets for news dissemination. Cable television systems, weekly newspapers, and magazines are considerably less influential,[2] but some studies have

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[1] G. H. Litwin and W. H. Wroth, "The Effects of Common Ownership on Media Content and Influence," filed by the National Association of Broadcasters in re Docket No. 18110, August 1969.

[2] For example, magazines would have a 4 percent weighting as news sources, according to the 1972 Roper survey data. Inclusion of magazines would reduce the newspaper-television-radio weightings calculated from these data from 47, 37, 16 to 46, 36, 15. However, magazines carry principally national news, so that their influence as local news sources would be even less.

equated them with television stations and daily newspapers. Doing so would then yield much lower concentration indexes. The choice of market size is once again critical, since the larger the market, the more media outlets it contains.

An extreme example of the effect of broadened market and media definition is the Seiden study prepared for the National Association of Broadcasters.[1] The study counts the number of television and radio stations, daily and weekly newspapers, and magazines available to the public in each ADI market in 1970, and the number of owners of these media. The results show an abundance of media outlets under diverse ownership in all markets. For example, in Cheyenne, Wyoming (Table 5), Seiden counts 45 locally originating media outlets with 38 distinct owners; and 114 total media outlets in the market. Yet in Cheyenne itself, a single owner controlled the only television station, the only daily newspaper, the only cable system, one of two FM radio stations, and one of four AM radio stations. The FCC considered media concentration in Cheyenne so severe that it designated the TV station's license renewal for hearing, as mentioned above, and the station was subsequently sold.

There are several reasons why Seiden's results fail to reveal significant media concentration in Cheyenne. First, the choice of the ADI extends the geographic market to over 10,000 square miles in three states--well beyond the grade B contour of the single Cheyenne television station. In fact, the two other television stations listed by Seiden as originating in the market are satellites of the Cheyenne station.

The Seiden study also fails to take into account the difference between national and local news dissemination. It includes national news magazines alongside local radio stations, although the two are hardly effective substitutes for presenting local news or community-oriented events. Moreover, the study gives all media outlets equal weighting. A network VHF television station with a 40 percent audience

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[1] M. H. Seiden and Associates, *Mass Communication in the United States--1970*, filed by the National Association of Broadcasters in re Docket No. 18110, January 1971.

Table 5

SEIDEN STUDY RESULTS FOR MEDIA COMPETITION
IN CHEYENNE, WYOMING

Media and Owners	Total Number in Market	Number Originating in Market	Number Entering Market	Number Reaching More Than 5% of Market
Media				
TV stations	13	3	10	3
Radio stations	31	13	18	3
Daily newspapers	11	6	5	3
Weekly newspapers	23	23	0	0
Magazines	36	0	36	17
Total media	114	45	69	26
Media owners	96	38	58	21

SOURCE: M. H. Seiden and Associates, *Mass Communications in the United States--1970*.

NOTE: Cheyenne, with 64,300 homes, was Market 156 in the Seiden study.

share is equated with an independent UHF station with a 2 percent share, as well as with a magazine reaching 100 or more homes in the community.

These definitions so balloon the number of media owners and outlets in each ADI market that it seems ludicrous to worry about concentration. While the Seiden study overstates its case to the point where it loses all semblance of objectivity, it is a dramatic demonstration of how strongly market and media definitions affect the determination of any quantitative index of local media concentration.

III. PRINCIPAL ARGUMENTS FOR AND AGAINST CROSS-OWNERSHIP RESTRICTIONS

Of the several hundred comments and replies filed in Docket No. 18110, more than 90 percent come from newspaper publishers and broadcast station owners who oppose divestiture of newspaper-broadcasting combinations. As discussed in more detail in our companion report, R-1584-NSF, the arguments presented on both sides are repetitive and generally based on weak evidence. In brief, the most important questions under debate include the following:

1. Do jointly owned media outlets give superior service?

Media owners argue that successful experience in one medium can be transferred to another. Newspaper owners and managers, they claim, are more concerned with information than with entertainment. They know the importance of local news and can recognize excellence in reporting. Consequently, a broadcast station owned by a newspaper is more likely to hire a good news staff, emphasize local reporting, and take independent stands on important local issues. In this view, the local media owner should be like the small-town publisher portrayed in stories and movies--strong, independent, and willing to lead public opinion, take unpopular stands, and place community service ahead of personal or corporate gain.

Only patchy evidence supports that picture of superior service, however. Some newspaper-owned broadcast stations clearly are considered the leaders in their communities in presenting local news and opinion. Others are not. Statistically, prior studies by Levin and others do not find that newspaper-owned broadcast stations provide more or better news and public affairs, local programming, program diversity, or other measures of community service.[1] And in the category

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[1] H. J. Levin, *Supplementary Comments*, Center for Policy Research, filed in re Docket No. 18110, May 1974; Comments of the Students' FCC Study Group, filed in re Docket No. 18110, May 1971; *Broadcasting in America: The Performance of Network Affiliates in the Top 50 Markets*, 42 FCC 2d 1 (1973).

of broadcast editorializing, the Litwin study sponsored by the National Association of Broadcasters suggests that newspaper-owned stations editorialized *less* than others, presumably at least in part to avoid charges of editorial collusion.[1] This result is based on a small sample and cannot be extrapolated to all newspaper-television station combinations without further evidence. But given the FCC's encouragement of broadcast editorials, Litwin's result argues against any claim of superior service by newspaper licensees.

2. Does cross-ownership lead to monopoly abuses or other harm to the public?

Proponents of the "one-to-a-market" rule point to the dangers of information control and undue economic power that arise from cross-ownership of a daily newspaper and a television station. Here again, however, although a number of specific examples have been reported,[2] prior studies develop no systematic evidence that the dangers are real.

A study submitted by Owen and others at Stanford reported that the newspaper advertising and TV time rates charged by a combination were significantly higher than the rates charged by other outlets.[3] But two studies submitted by the NAB as refutations of the Owen results show no significant differences in advertising rates.[4] These results differ because they are based on different models of advertiser behavior, neither of which is complete and can be considered definitive. Consequently, one cannot accept either result with confidence.[5]

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[1] Litwin and Wroth, op. cit.

[2] See S. R. Barnett, "Cable Television and Media Concentration, Part I: Control of Cable Systems by Local Broadcasters," *Stanford Law Review*, Vol. 22, No. 2, January 1970; and Reply Comments in Docket No. 18110, August 1971.

[3] J. Rosse, B. Owen, and D. Grey, *Economic Issues in Joint Ownership of Newspaper and TV Media*, Stanford University Research Center in Economic Growth, Memorandum No. 97, filed in re Docket No. 18110, June 1970.

[4] A. Lago and D. Osborne, *A Quantitative Analysis of the Price Effects of Joint Mass Communication Media Ownership*, filed in re Docket No. 18110, March 1971; J. Rosse, *Credible and Incredible Economic Evidence*, filed in re Docket No. 18110, April 1971; Appendix D to the *Comments of the National Association of Broadcasters*, National Association of Broadcasters, filed in re Docket No. 18110, August 1971.

[5] The technical question of whether circulation and audience variables need be explicitly included in these studies is discussed in our companion report, R-1584-NSF.

Similarly, two studies have suggested that the citizens of Zanesville, Ohio, a former media monopoly, had a lower level of knowledge of current events and were otherwise more poorly served by the media than were citizens in comparable cities with media competition.[1] But this result cannot simply be extrapolated to all other media monopolies; the policy question is whether there is a general tendency for media monopolists to provide poorer service. Additional evidence from other cities is needed to answer that question.

The industries contend that without substantial evidence of abuses, no further restrictions should be placed on media ownership. Proponents of a divestiture rule retort that dangers exist despite the lack of concrete evidence of harm from cross-ownership. They point out that statistical analysis may fail to reveal the subtle influences of local media concentration; the effects of ownership may be qualitative, not quantitative. More important, they argue, the evidence fails to support claims that cross-ownership results in superior service. Consequently, cross-ownership should be prohibited except where clear public benefits can be demonstrated. Without such a showing, they contend, the public has little to lose and possibly much to gain from diversifying the sources of information and media advertising in the community.

3. <u>Will divestiture cause undue industry disruption</u>?

Newspapers claim to be among the more stable of broadcast station licensees. Consequently, the industry argues that forced divestiture of existing combinations would lead to more frequent changes of station ownership and management in the future, as well as depress market prices of stations sold during the divestiture period.

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[1] *The Effects of Local Media Monopoly on the Mass Mind*, The American Institute for Political Communication, Washington, D.C., January 1971; Guido H. Stempel, III, "Effects on Performance of a Cross-Media Monopoly," *Journalism Monographs*, No. 29, June 1973.

Published articles and FCC filings do not document the rate of transfer of cross-owned broadcast stations relative to other stations. However, the number of newspaper-television station combinations has decreased by seventeen, or by more than one-sixth of the total during the past four years. In four cases the newspaper was sold, in ten cases the television station was sold, in one additional case the television station was sold after the FCC designated the license for hearing on the basis that the owner exerted excessive control over local media,[1] in one case the television station license was cancelled,[2] and in one case the station went off the air. Sales of three other cross-owned television stations and one newspaper have been announced.[3] The threat of FCC or Justice Department action against combinations has likely influenced many of these transactions. But even if sales continue at this relatively high rate, and no new combinations are established, newspaper-television station cross-ownerships will not disappear completely for more than twenty years.

It is difficult to determine the extent to which sale prices of broadcast stations (the properties most likely to be sold) would be depressed under a five-year divestiture rule, because no good estimates of the demand for television stations seem available. By considering the increase in supply if all newspaper-owned stations were sold, Frazier, Gross and Company estimated that prices would be depressed by 10 to 20 percent.[4] But an equally plausible thesis is that station swaps and the five-year or longer divestiture period would guarantee an orderly market in which prices would be close to

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[1] *Frontier*, cited earlier.

[2] WHDH, cited earlier.

[3] Sale of the Ridder-owned station in Duluth, Minnesota, has been announced and awaits FCC approval; the Ridder and Knight newspaper groups have announced their intention to sell their television stations in Minneapolis, Minnesota, and Akron, Ohio, when their proposed merger is completed; and the pending sale of the Wausau *Record-Herald* has been reported.

[4] Frazier, Gross and Co., *Valuation of Newspaper Owned Television Stations Affected by the FCC's Proposed Divestiture Rule*, filed by the American Newspaper Publishers Association in re Docket No. 18110, August 1971.

those which would result in the absence of divestiture. In any case no forfeiture is involved.

The Frazier, Gross study also claims that broadcast stations may be worth more to newspapers than to other business interests. However, there seems little economic merit to this argument,[1] unless cross-ownership does indeed involve substantial market-power advantages--in which case the argument for divestiture would be further strengthened.

4. Would divestiture reduce local ownership of broadcast stations?

Local ownership of broadcast stations and integration of station ownership and management have been given positive weights by the FCC in comparative hearings, although they are not without criticism as elements of licensing policy.[2] The Commission's reasoning is that local owners who participate in station management will take greater concern in programming for local needs and interests. Newspaper sales or swapping of broadcast stations undoubtedly would increase the number of absentee owners (60 of the 79 present newspaper-television combinations are locally owned, if we include combinations in the headquarters city of a major chain--e.g., the Newhouse combination in Syracuse, New York). The Commission therefore must assess the tradeoffs between the two conflicting policies of ownership diversification and local ownership. But again, there is no evidence that local owners provide either better or worse broadcast service than other owners.

5. Might divestiture force some newspapers out of business, as well as retard UHF and FM station development?

This frequently repeated argument holds that some profitable broadcast stations subsidize unprofitable newspapers that would have

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[1] Newspaper owners emphasize their knowledge of broadcasting gained over many years and the cost of retraining management to operate nonlocal stations or wholly different businesses. These and other transaction costs must be considered in assessing the benefits and costs of cross-media diversification, but from an economic point of view they would not appear to pose a major obstacle to divestiture.

[2] See for example, Noll et al., op. cit., pp. 108-120, for a general critique of the value of localism.

to cease operating if divestiture were required. There is little evidence or economic common sense behind this argument, however.

Levin has found that the economies of joint newspaper-broadcast station production are limited, if they exist at all.[1] Indeed, industry filings generally disclaim substantial joint economies when they point to newspaper-broadcast station independence in advertising, editorializing, and reporting. Consequently, an unprofitable newspaper should have no reason to prefer subsidies from a broadcast station to those from any other business. Media cross-owners cannot have it both ways; either they enjoy joint economies or market power advantages, or else owning a broadcast station is no more necessary for newspaper survival than owning a pencil factory.[2]

Moreover, only 21 of the 79 operating television-newspaper combinations face daily newspaper competition within their city of publication. In cities with monopoly newspapers or joint operating agreements, divestiture of broadcast stations would not be expected to harm newspaper survival.

A related argument states that a profitable newspaper may be the only entity willing to invest in a money losing UHF or FM station, although only 6 of the 79 operating television stations owned by newspapers are UHF stations. Thus, if divestiture were ordered, some UHF and FM stations might not find buyers and would go off the air, which would be contrary to the public interest. This argument again assumes that at least some newspaper owners will value UHF or FM stations significantly higher than will other businessmen, perhaps because (1) they ascribe a high value to foreclosing competition from other media; (2) they are more willing to make investments with long-term payback;

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[1] H. J. Levin, *Broadcast Regulation and Joint Ownership of Media*, New York University Press, New York, 1960.

[2] The fact that broadcast station return on investment is high relative to other industries is not really relevant here, since profitability will be reflected in the price at which the station can be sold, the proceeds of which then can be reinvested elsewhere. The problem of capital gains taxes could be resolved through the issuance of special tax certificates, for which there is ample precedent.

or (3) they have other, noneconomic reasons for developing unprofitable broadcast facilities. Economists generally view the latter two points with considerable skepticism;[1] however, to the extent they are valid, any divestiture rule must allow the possibility of waiver where special circumstances warrant.[2]

6. Would divestiture increase media ownership and access by minority groups?

Some citizen groups such as the National Black Media Coalition and the National Citizens Committee for Broadcasting have suggested that ownership diversification would expand access to the media for minority groups and others who are not now represented in the media ownership ranks. However, there is no evidence that minority owners program or otherwise behave differently from nonminority owners whose stations cater to minority audiences. Moreover, the high cost of purchasing a daily newspaper or a television station would discourage minority ownership even if divestiture of newspaper-broadcast station combinations were ordered. Additional minority ownership of radio stations and cable television systems seems a more likely trend.[3]

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[1] As witness the comments of James N. Rosse, Bruce M. Owen, and David L. Grey in Docket 18110: "to suggest that only television licensees in the same market possess the sufficient measure of philanthropy toward competing newspapers, or vice versa, strikes us as disingenuous."

[2] *U.S. v. Storer Broadcasting Co.*, 351 U.S. 195, 204-205 (1956).

[3] Angela Shaw, "On Crossownership and Minority Ownership of Electronic Media," unpublished memorandum, 1974; Charles Tate (ed.), *Cable Television in the Cities; Community Control, Public Access, and Minority Ownership*, The Urban Institute, Washington, D.C., 1971. Another approach to encouraging minority ownership of television stations would be for the FCC to favor minority groups in awarding new station licenses. See *TV-9, Inc. v. FCC*, D.C. Cir., Case No. 72-2049, decided November 6, 1973, petition for certiorari pending; and the petition for proposed rulemaking filed by the Office of Communications, United Church of Christ, et al., RM-2346, March 1974.

IV. OPTIONS FOR FEDERAL ACTION

DISCUSSION OF SIX PRINCIPAL OPTIONS

The FCC, under pressure from the Antitrust Division, the Congress, and the courts to resolve the newspaper-television station cross-ownership issue in Docket No. 18110, has six principal options:[1]

1. To adopt a rule banning future newspaper-television combinations in the same community, but leaving present combinations intact;
2. To adopt a rule not only banning newspaper-television combinations in the future, but requiring divestiture of existing combinations over an appropriate period;
3. To adopt a rule requiring divestiture only in highly concentrated markets;
4. To terminate the rulemaking and proceed on a case-by-case basis, examining present and prospective combinations in terms of news and advertising concentration in their local markets;
5. To proceed on a case-by-case basis only when egregious concentration, abuses, or predatory practices have been shown to occur;
6. To examine combinations through the comparative hearing renewal process.

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[1]These six options deal with the regulation of media ownership. Two other ways to promote the presentation of diverse ideas and opinions, at least in principle, would be to guarantee access to the media or to expand the supply of available media channels. For example, the federal government could require broadcast licensees to lease time on their stations, just as cable systems are required to have channels available for lease. Or the government could subsidize the development of additional UHF television stations and cable systems as media competitors in concentrated markets. Because neither of these approaches can be considered in Docket No. 18110, they are not discussed further in this report; however, alternatives to ownership regulation in the electronic media deserve greater attention by both policymakers and researchers.

We examine these briefly in turn.

1. A rule banning future newspaper-television combinations in the same community.

This would parallel the rule adopted in the earlier phase of Docket No. 18110 that bars future radio-television combinations. In pursuing this option, the FCC could argue that daily newspapers are both more influential sources of local news and opinion than are radio stations, and are in shorter supply. Consequently, if the Commission has previously found that radio-television combinations contravene the public interest, then *a fortiori*, newspaper-television combinations must also, and future combinations should be barred.

In adopting a prospective ban only, the Commission could argue that divestiture should not be ordered because no evidence of widespread abuses or systematic harm to the public has been shown after more than twenty years of combined newspaper-television operations. Moreover, the number of television outlets is increasing as UHF stations become more effective competitors. Consequently, divestiture would be an unduly disruptive solution. As to UHF stations, a newspaper's application to acquire such a station could be treated on an ad hoc basis.

A rule banning future combinations could also include the requirement that present combinations maintain separate newspaper and television operations (e.g., fully separate news and advertising staffs, no combination advertising rates, and so forth). This would pose little problem to the industry, since the newspaper and television station are generally operated separately today, except for the joint owner's hiring of top management and setting of basic corporate policies.

2. A rule barring newspaper-television combinations in the future and requiring divestiture of existing combinations over an appropriate period.

The argument for this approach would be that if newspaper-television cross-ownership contravenes the public interest, then combinations should be broken up. Waiting for combination owners to sell on their own initiative will take too long. The Commission could argue that divestiture is the only effective way to meet its diversification objective; and it is not novel or strained to use it in such circumstances. On the contrary, it is an obvious tool that the Commission has used before.[1]

In choosing this option, the FCC would also argue that industry losses, lessened local ownership, and other real or potential problems are less significant than the expected advantages to the public from diversification. A rule requiring divestiture of all combinations would obviate the need for the federal government to make subjective judgments about what constitutes "diversity" or "concentration," or to inquire into news and advertising practices in search of "abuses." And it would be far easier to enforce than a rule requiring divestiture only in certain situations. Serious inequities, of course, would be dealt with on a waiver basis.

3. <u>A rule requiring divestiture only in highly concentrated markets</u>.

Such a rule would be desirable in focusing on the specific situations in which undue concentration exists. The problem, of course, is to define "undue concentration" and to determine criteria by which it can be measured. Some possible approaches, such as counting the number of newspaper and television station competitors, measuring market shares, or constructing a concentration index have been described above.

For example, it can be seen from Table 1 that a rule requiring divestiture in an area where no competitive daily newspaper is published, and only one competitive TV station (or none) is licensed in the community, would affect 30 of the 79 operating newspaper-television combinations. Increasing the threshold to two competitive TV stations would require divestiture of 50 combinations. The impact of other

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[1] Examples are the divestiture required of NBC in the original Chain Broadcasting rules (ending NBC's operation of two networks and leading to the creation of ABC), the required sale of one of two commonly owned co-located AM stations in 1943, and the divestiture required under the rule forbidding cross-ownership of a cable television system and a broadcast television station.

definitions of "undue concentration" based on counting newspaper and television competitors can also be read from Table 1. Similar results, using the SMSA or ADI market definitions, can be obtained from Tables 2 and 3.

Insofar as circulation and audience share data are more meaningful than simply counting competitive newspapers and television stations, the impact of a divestiture order based on such shares can be seen in Figs. 1, 2, and 3. As an example (roughly comparable to the monopoly newspaper and two TV station situations outlined above), divestiture of combinations with more than 90 percent of daily circulation and more than 50 percent of prime time audience among local newspapers and television stations would affect 28 of the 79 present combinations. Choosing other market share thresholds would give different results, of course. Any particular choice of threshold is a matter of judgment--as is, for example, the 5 VHF or 7 AM multiple station ownership limitation. And extending the relevant market to the SMSA or ADI would greatly reduce the number of combinations affected.

Obviously, then, the choice of market size is critical. The appropriate market definition depends in large part on whether one is concerned with competition for news and advertising at the local, regional, or national level. If regional and national competition is the chief concern, the ADI is a logical area in which to measure competition. However, if the FCC's localism policy implies concern for competition in local advertising and local information sources, then the city or county of license would be a better choice. Indeed, the argument for using the city of license as the relevant market is that concentration of information sources within the city itself contravenes the public interest, regardless of how much competition may prevail in some larger area. Diversification of information sources on local matters such as a mayoral election or a school bond issue is the desired objective, and newspapers or television stations located in other cities are not effective substitutes for local media coverage.

4. <u>A case-by-case approach</u>.

The argument for this option is that each case should be examined according to its own relevant facts, it being so difficult--as on the issue of local news concentration--to formulate a rule that will be appropriate in all situations. Instead, the FCC should examine the competition facing each combination in its core city, core county, SMSA, and ADI. Indeed, FCC action may be called for if *two* or *three* media cross-owners dominate the relevant market.

Those considerations are even more germane to the issue of concentration in local advertising markets--the focus of Antitrust's petitions to deny license renewals of newspaper-owned television stations in St. Louis, Minneapolis, Milwaukee, Des Moines, and Topeka. In its challenges, Antitrust cites national statistics that 12 percent of *local* advertising is placed in television, 74 percent in newspapers, and 14 percent in radio. Those statistics could be applied to develop market-by-market concentration indexes for local media advertising, but doing so would not take into account variations within individual markets. Consequently, Antitrust in its pleadings has stated that ". . . a relevant geographic market [cannot] be laid out for mass media without empirical data on the reach, penetration, coverage, and cost efficacy of the media in question[;] developing that data in detail must occur as part of the hearing process."[1] Further, the ad hoc hearing process can take into account the entire market picture, such as whether a few large firms dominate the market[2]

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[1]Petition in Matter of Pulitzer Publishing Co., p. 15.

[2]This is in line with the guidelines issued by the Antitrust Division, indicating when horizontal mergers would be attacked. 1 CCH Trade Reg. Rep. ¶4430 (1968):

> . . . In highly concentrated markets, defined as those where the four largest firms have approximately 75% of the market, the Department indicated that it would ordinarily challenge mergers between firms with the following market shares [*Id.* at p. 6683]:
>
> | Acquiring Firm | Acquired Firm |
> |---|---|
> | 4% | 4% or more |
> | 10% | 2% or more |
> | 15% or more | 1% or more |
>
> When the top four firms control less than about 75% of the market, the guidelines call into question mergers

and the relationship among these firms. The effect of a newspaper joint-operating arrangement would be one such example.

The Antitrust position is that whether a newspaper acquired its broadcast stations by purchase (transfer) or by original application, its joint holding constitutes a combination that the FCC should examine in light of the appropriate standards under Section 7 of the Clayton Act. These standards hold that an acquisition

> . . . which produces a firm controlling an undue percentage share of the relevant market, and results in a significant increase in the concentration of firms in that market, is so inherently likely to lessen competition substantially that it must be enjoined in the absence of evidence clearly showing that the merger is not likely to have such anticompetitive effects . . . Without attempting to specify the smallest market share which would still be considered to threaten undue concentration, we are clear that 30% presents that threat.[1]

The Department's allegations in these renewal cases are that Section 7 standards have been contravened.[2] In support, the Department cites

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between competitors with the following market shares [*Id.* at p. 6684]:

Acquiring Firm	Acquired Firm
5%	5% or more
10%	4% or more
15%	3% or more
20%	2% or more
25%	1% or more

The above are only guidelines. See R. W. Bennett, "Media Concentration and the FCC: Focusing with a Section 7 Lens," 66 *Northwestern Law Review* 159, 171 (1971).

[1]*U.S. v. Philadelphia National Bank,* 374 U.S. 321 (1963).

[2]Again, to give but one example, the St. Louis petition states that ". . . inferences drawn from published data indicate that the absolute level of concentration is extremely high in both the St. Louis ADI (top two concerns 63.9%) and the St. Louis SMSA (top two concerns 68.3%) and that in those areas Pulitzer combines a 5% share from broadcasting with a 30% share from newspaper publication while Newhouse combines a 3.5% share from broadcasting with a 25% share from newspaper publication." Petition in the Matter of Pulitzer Publishing Co., p. 22.

not only *Philadelphia Bank* but later cases in which the Supreme Court has found market shares even lower than 30 percent sufficient to establish a violation.[1]

The Department has obviously begun with what it believes to be its strongest cases, well within the above guidelines.[2] If it is successful with these cases, the question is raised whether the Department will move on until it is challenging media holdings of the *Von's Grocery* nature--a 7.5 percent market share. In effect, this would become a standard for across-the-board divestiture.

A final variation on this manner of proceeding would be to require a newspaper applying for a new television license or transfer to delineate its share of the market, either of local advertising revenue or news dissemination or both, with FCC specification of appropriate market and weighting factors to be used (e.g. core county, audience share in the evening news program time, and so forth). This would be

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[1]These citations include *U.S. v. Aluminum Co. of America (Rome)*, 377 U.S. 271 (1964), where the Court held that an acquisition of a firm with 1.3% of the market by a firm with a market share of 29.1% violated Section 7 of the Clayton Act in a setting where the top 4 firms had 76% of the market; *U.S. v. Continental Can Co.*, 378 U.S. 441 (1964), where a merger involving firms with 25 and 3.1% of a combined metal and glass container market was held to be illegal in a setting in which the top 6 firms had 70.1% of the market; and *U.S. v. Von's Grocery Co.*, 384 U.S. 270 (1966), where Sec. 7 of the Clayton Act was held to have been violated by a merger which gave the surviving firm only 7.5% of a market which was characterized by a trend toward increased concentration and in which the top 4 firms in that market had 24.4% of the market.

[2]See statement of Mr. Bruce Wilson, Deputy Assistant Attorney General, before the Federal Communications Bar Association, February 25, 1974, *Broadcasting Magazine*, March 4, 1974, p. 41; see also *Variety*, March 6, 1974, p. 31. Thus, in filing the recent petitions to deny the renewals of Midwest Radio-Television, Inc., in Minneapolis, Minn., Justice alleges that ". . . the ownership structure of Midwest collects together the two Minneapolis newspapers, the two St. Paul newspapers, the leading television station, the locally dominant radio station, and an FM station." The combination, Justice charges, controls 84 percent of local advertising. See *Variety*, loc. cit. Justice officials have pointed out that the Midwest case is similar to the St. Louis and Des Moines cases filed on January 2 and that the campaign against media controlling at least 80 percent of local advertising will continue. See *Broadcasting Magazine*, March 11, 1974, p. 35.

of assistance to the FCC and interested parties such as the Justice Department or listener groups.

5. <u>An ad hoc approach in egregious cases</u>.

The concept here would differ markedly from the above ad hoc manner of proceeding. The FCC would state that with UHF stations becoming more successful,[1] the market is characterized by a trend toward decreased concentration. Changes wrought by new technology such as cable also militate against general divestiture at this time. That is, they move one to ask why, if newspaper-television combinations have been tolerated for so long, the FCC should undertake to disrupt the practice now, when improvement is in the offing? Consequently, the Commission would opt for divestiture only in the egregious case--for example, where the only newspaper owns the only television station, as in the Cheyenne situation.

The FCC could also state that it would act where abuses or predatory practices are shown to occur. An example here would be the case of *Mansfield Journal Company*.[2] Indeed, the FCC might adopt rules to proscribe some of the more obvious improper practices, such as preferential combination advertising rates in a co-owned newspaper and broadcast station.

Finally, the Commission could state that as a matter of policy or comity, it should defer to the Congress in an important policy matter of this nature. Congress has considered the matter on several occasions but never enacted legislation because of its conclusion, reached after discussion with FCC representatives, that legislation was unnecessary.[3] While the issue here (divestiture of newspaper-television combinations) differs from that before the Congress in 1949 and 1952 (the status of the newspaper applicant in the comparative television hearing), the comity principle remains the same: there

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[1]See 47 U.S.C. 303(s); *Television Broadcast Financial Data, 1972*, Table 7 (FCC Memo 05693).

[2]*Mansfield Journal Co. v. FCC*, 180 F. 2d 28 (D.C. cir. 1950).

[3]See the legislative history of S. 1973, 81st Cong. (1949), and of H.R. 1750, 82nd Cong. (1952); *98 Cong. Rec.* 9022-9033.

should be full consultation and deference to Congress for guidance on a matter of this importance.[1]

6. Regulation through the comparative hearing process.

Under the Communications Act, parties may file competing applications at renewal time and, if successful in the comparative hearing which must then be held, supplant the regular renewal applicant on the contested channel.[2] In the 1971 *Citizens* case, the Court stressed the importance in such a comparative hearing of the factor of diversification of control:

> Since one very significant aspect of the 'public interest, convenience, and necessity' is the need for diverse and antagonistic sources of information, the Commission simply cannot make a valid public interest determination without considering the extent to which the ownership of the media will be concentrated or diversified by the grant of one or another of the applications before it . . . Diversification is a factor properly to be weighed and balanced with other important factors, including the renewal applicant's prior record, at a renewal hearing.[3]

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[1]As a practical matter, such guidance in the form of legislation would probably be difficult to obtain. Indeed, the most recent legislation, H.R. 12993 in the 94th Congress, expressly directs the FCC to complete its pending rulemaking proceeding within six months of the date of enactment of the bill. The Committee Report does provide some guidance to the Commission:

> . . . the committee is of the view that the Commission, in connection with any rules it may adopt, could take into account, among other things, such factors as the size of the market in question; the other interests of the ownership; the number of broadcast stations in the market; the other communications media, such as newspapers and cable systems, in the market; the extent to which other broadcast signals are received in the market; the circulation of newspapers in the market which are published outside thereof; and the extent to which there is concentration of media control as reflected by various other factors.

H. Rept. 93-961, p. 19.

[2]See *Citizens Communications Center v. FCC,* 447 F. 2d 1210 (D.C. Cir. 1971).

[3]Ibid., pp. 1213-14, n. 36.

The *Citizens* case establishes the option of cross-media divestiture through the license renewal process. This option will be removed if the Broadcast License Renewal Act is passed. But even without new legislation the FCC seems most unlikely to deny the application of a regular renewal applicant on diversification grounds.[1] To do so would endanger the stability of the majority of existing licensees who have other media interests. The Commission clearly regards this as an unfair forfeiture that would invite wholesale challenges and complete chaos, as well as incur the wrath of Congress.[2]

EVALUATION OF THE OPTIONS

The evidence on the effects of media cross-ownership supports neither allegations of substantial harm nor those of substantial public benefits from newspaper-television combinations. Proponents of a divestiture rule argue that, in the absence of a showing of clear benefits from cross-ownership, combinations should be broken up to diversify the sources of local news and opinion. Opponents argue that in the absence of demonstrations of harm, the present ownership structure should continue. Consequently, legal and regulatory judgments may hinge on the question of who bears the burden of proof. At this time neither side seems able to shoulder that burden.

The most difficult question facing the FCC in Docket 18110 is whether to issue a rule requiring divestiture of some or all co-located

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[1] The FCC appears reluctant to grant the application of a newcomer upon *any* basis. See *Moline Television Corp.*, 31 FCC 2d 263 (1971); *In re Renewal of KHJ, Inc.*, 44 FCC 2d 123, appeal pending; *Fidelity Broadcasting Co. v. FCC* (D.C. Cir., Case No. 742213).

[2] Although the Commission has taken cognizance of the Court's decision in *Citizens*, it has gone on to say (FCC 71-826):

> . . . Finally, we add our belief that the Court is not seeking to have the ownership patterns of the broadcast industry restructured through the renewal process. This would be chaotic in the extreme and administratively a horror. If <u>overall</u> restructuring is to be considered--and there are more substantial issues on this score--it should be in the context of an appropriate rule making, with a reasonable opportunity for all parties to comment fully on the proposed rules.

newspaper-television combinations. The Commission seems unlikely to require complete divestiture, even though procedurally it might be the simplest approach.[1] Instead, it may prefer to make a rule barring future combinations and requiring present combinations to maintain separate newspaper and television operations. It would then deal with alleged cases of undue concentration or abuses from present combinations on an ad hoc basis.

Enactment of the Broadcast License Renewal Act, however, would prohibit the FCC from considering the concentration issue at renewal time, which is the most natural ad hoc procedure. Antitrust actions in the courts would then be the only remaining ad hoc recourse--an expensive and time-consuming one for all concerned.

There is much to recommend a rule that would bar future combinations and spell out criteria for determining undue concentration and monopoly abuses requiring divestiture of present combinations. Such a rule would meet the intent of the Broadcast License Renewal Act and set clear, uniform standards for the broadcast industry. Any rule should be simple to apply and interpret. To give an obvious example, a rule might start by setting the "undue concentration" criterion at a point that would cover situations like *Frontier*--i.e., those in which a monopoly newspaper owns a community's only licensed television station.

The 17 combinations with monopoly status in their home cities are listed in Table 6. Several of these combinations, such as those in Greensboro, North Carolina, and Norfolk, Virginia, face strong competition within the county or SMSA; all but three face competition within the ADI. The Texarkana combination, for example, holds a newspaper-television monopoly in its metropolitan area but captures only a small fraction of readers and viewers in the Shreveport-Texarkana ADI. The Commission therefore must determine which is the relevant marketplace

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[1] According to *Broadcasting Magazine*, March 11, 1974, pp. 27-31: "Commission officials say that Chairman Burch probably felt that lack of support for the measure was so apparent that the Commission's time might better be spent on other matters." Chairman Burch, who suggested divestiture, has now left the FCC, thus further reducing its chances.

Table 6

MONOPOLY NEWSPAPER-TELEVISION COMBINATIONS

	City	County	SMSA	ADI
Anniston, Alabama	X	X	X	X
Albany, Georgia	X	X	X	
Quincy, Illinois	X	X	X	
Rock Island, Illinois	X			
Elkhart, Indiana	X			
Mason City, Iowa	X	X	X	
Columbus, Mississippi	X	X	X	X
Meridian, Mississippi[a]	X	X	X	X
Hastings, Nebraska	X	X	X	
Watertown, New York	X	X	X	
Greensboro, North Carolina	X			
Hickory, North Carolina	X	X	X	
Akron, Ohio	X	X		
Temple, Texas	X			
Texarkana, Texas	X	X	X	
Norfolk, Virginia	X			
Bluefield, West Virginia	X	X	X	

NOTE: An "X" denotes no daily newspaper or television station competition within that geographic area.

[a]The newspaper-television combination in Meridian, Mississippi, has a single UHF competitor with a one percent prime time audience share; Meridian is therefore included among the monopoly combinations.

for news, opinion, and advertising--the city, county, metropolitan area, ADI, or the television signal grade A or grade B contour. Considering the Commission's longstanding concern for local service, the city, county, or metropolitan area (SMSA) seems a better choice of local market than some wider area.

In adopting any rule in this area, policymakers must weigh the desirability of diversifying sources of information against possible harm to the public interest from industry disruption and some decreases in local ownership. Analysis such as that contained in this paper can point out the implications of adopting alternative criteria or rules, but it cannot substitute for qualitative judgments of what media ownership structure best promotes the public welfare.

Appendix

CHARACTERISTICS OF NEWSPAPER-TELEVISION STATION COMBINATIONS IN THE UNITED STATES, JULY 1974

TABLE 7
JOINTLY OWNED DAILY NEWSPAPERS AND TELEVISION STATIONS IN THE SAME MARKET

										GROUP OWNERSHIP		
NO.	STATE	CITY	AREA OF DOMINANT INFLUENCE	ADI RANK	NAME OF NEWSPAPER	TV CALL SIGN	NETWORK AFF.	VHF OR UHF	LOCAL OWNERSHIP[b]	NAME OF GROUP OWNER	NUMBER OF GROUP OWNED DAILIES	NUMBER OF GROUP OWNED TV
1	ALA	ANNISTON	ANNISTON	193	ANNISTON STAR	WHMA	CBS	V	YES	ANNISTON STAR	2	1
2	ALA	BIRMINGHAM	BIRMINGHAM	47	BIRMINGHAM NEWS	WAPI	NBC	V	NO	NEWHOUSE NEWSPAPERS	16	6
3	ARK	LITTLE ROCK	LITTLE ROCK	55	ARKANSAS DEMOCRAT	KTHV	CBS	V	YES			
4	CAL	FRESNO	FRESNO	73	FRESNO BEE	KMJ	NBC	U	NO	MCCLATCHY	3	2
5	CAL	SACRAMENTO	SACRAMENTO-STOCKTON	26	SACRAMENTO BEE	KOVR	ABC	V	YES	MCCLATCHY	3	2
6	CAL	SAN FRANCISCO	SAN FRANCISCO	6	SAN FRANCISCO CHRONICLE	KRON	NBC	V	YES			
7	COL	DENVER	DENVER	29	DENVER POST	KHBC[a]	IND	U	NO	NEWHOUSE NEWSPAPERS	16	6
8	DC	WASHINGTON	WASHINGTON	9	WASHINGTON STAR	WMAL	ABC	V	YES	WASHINGTON STAR	1	3
9	DC	WASHINGTON	WASHINGTON	9	WASHINGTONPOST	WTOP	CBS	V	YES	POST NEWSWEEK	1	3
10	FLA	TAMPA	TAMPA-ST PETERSBURG	20	TAMPA TRIBUNE & TIMES	WFLA	NBC	V	NO	MEDIA GENERAL	3	1
11	GA	ALBANY	ALBANY	148	ALBANY HERALD	WALB	NBC*	V	YES	GRAY COMMUNICATIONS	1	3
12	GA	ATLANTA	ATLANTA	17	ATLANTA JOURNAL & CONSTITUTION	WSB	NBC	V	YES	J.M. COX	6	5
13	IDA	IDAHO FALLS	IDAHO FALLS-POCATELLO	172	IDAHO FALLS POST REGISTER	KIFI	NBC*	V	YES			
14	ILL	CHAMPAIGN	SPRINGFIELD-DECATUR-CHAMPAIGN	74	CHAMPAIGN COURIER & NEWS GAZETTE	WCIA	CBS	V	NO	MIDWEST TELEVISION/ LINDSAY-SCHAUB	0 6	3 1
15	ILL	CHICAGO	CHICAGO	3	CHICAGO TRIBUNE & CHICAGO TODAY	WGN	IND	V	YES	TRIBUNE CORPORATION	6	4
16	ILL	CHICAGO	CHICAGO	3	CHICAGO DAILY NEWS & SUN TIMES	WFLD	IND	U	YES			
17	ILL	QUINCY	QUINCY-HANNIBAL	124	QUINCY HERALD-WHIG	WGEM	NBC	V	YES			
18	ILL	ROCK ISLAND	DAVENPORT-ROCK ISLAND-MOLINE	67	ROCK ISLAND ARGUS	WHBF	CBS	V	YES			
19	IND	BLOOMINGTON	INDIANAPOLIS	18	BLOOMINGTON-BEDFORD COURIER TRIBUNE	WTTV	IND	V	YES			
20	IND	ELKHART	SOUTH BEND-ELKHART	87	ELKHART TRUTH	WSJV	ABC	V	YES			
21	IND	SOUTH BEND	SOUTH BEND-ELKHART	87	SOUTH BEND TRIBUNE	WSBT	CBS	U	YES	SOUTH BEND NEWS	7	2
22	IND	TERRE HAUTE	TERRE HAUTE	113	TERRE HAUTE STAR & TRIBUNE	WTHI	CBS*	V	YES			
23	IOWA	CEDAR RAPIDS	CEDAR RAPIDS-WATERLOO	70	CEDAR RAPIDS GAZETTE	KCRG	ABC	V	YES			
24	IOWA	DES MOINES	DES MOINES	62	DES MOINES REGISTER & TRIBUNE	KRNT	CBS	V	YES	COWLES COMMUNICATION	5	3
25	IOWA	MASON CITY	ROCHESTER-MASON CITY-AUSTIN	130	MASON CITY GLOBE GAZETTE	KGLO	CBS	V	NO	LEE ENTERPRISES	14	4
26	KAN	TOPEKA	TOPEKA	129	TOPEKA STATE JOURNAL & CAPITAL	WIBW	CBS	V	YES	STAUFFER PUBLICATION	14	2
27	KY	LOUISVILLE	LOUISVILLE	36	LOUISVILLE COURIER JOURNAL & TIMES	WHAS	CBS	V	YES			
28	KY	PADUCAH	PADUCAH-HARRISBURG-CAPE GIRARDEAU	72	PADUCAH SUN DEMOCRAT	WPSD	NBC	V	YES			

29	LA	BATON ROUGE	BATON ROUGE	101	BATON ROUGE ADVOCATE & STATE TIMES	WBRZ	NBC	V	YES			
30	LA	SHREVEPORT	SHREVEPORT-TEXARKANA	58	SHREVEPORT JOURNAL	KSLA	CBS	V	YES			
31	ME	PORTLAND	PORTLAND-POLAND SPRING	75	PORTLAND PRESS HERALD EXPRESS & TELEGRAM	WGAN	CBS	V	YES	GUY GANNETT PUBLIC.	3	2
32	MD	BALTIMORE	BALTIMORE	19	BALTIMORE NEWS AMERICAN	WBAL	NBC	V	NO	HEARST CORPORATION	7	3
33	MD	BALTIMORE	BALTIMORE	19	BALTIMORE SUN	WMAR	CBS	V	YES	A.S. ABELL	1	2
34	MICH	DETROIT	DETROIT	7	DETROIT NEWS	WWJ	NBC	V	YES	EVENING NEWS	1	3
35	MINN	DULUTH	DULUTH-SUPERIOR	110	DULUTH NEWS TRIBUNE & HERALD	WDSM	NBC	V	NO	RIDDER PUBLICATIONS	13	2
36	MINN	MINNEAPOLIS-ST PAUL	MINNEAPOLIS-ST PAUL	13	MINNEAPOLIS STAR & TRIBUNE; ST PAUL PIONEER PRESS & DISPATCH	WCCO	CBS	V	YES	JOHN COWLES RIDDER PUBLICATIONS	1 13	2 2
37	MISS	COLUMBUS	COLUMBUS	165	COLUMBUS COMMERCIAL DISPATCH	WCBI	NBC**	V	YES			
38	MISS	JACKSON	JACKSON	80	JACKSON CLARION-LEDGER & NEWS	WJTV	NBC	V	YES			
39	MISS	MERIDIAN	MERIDIAN	162	MERIDIAN STAR	WTOK	CBS*	V	YES			
40	MO	JOPLIN	JOPLIN-PITTSBURG	118	JOPLIN GLOBE	KOAM	NBC	V	YES			
41	MO	ST LOUIS	ST LOUIS	12	ST LOUIS POST DISPATCH	KSD	NBC	V	YES	PULITZER PUBLICATION	2	2
42	MO	ST LOUIS	ST LOUIS	12	ST LOUIS GLOBE DEMOCRAT	KTVI	ABC	V	NO	NEWHOUSE NEWSPAPERS	16	6
43	MO	SPRINGFIELD	SPRINGFIELD	88	SPINGFIED LEADER,NEWS & PRESS	KYTV	NBC	V	YES			
44	NEB	HASTINGS	LINCOLN-HASTINGS KEARNY	81	HASTINGS TRIBUNE	KHAS	NBC	V	YES			
45	NEB	OMAHA	OMAHA	63	OMAHA WORLD HERALD	KETV	ABC	V	YES			
46	NEV	LAS VEGAS	LAS VEGAS	144	LAS VEGAS REVIEW-JOURNAL	KORK	NBC	V	NO	DONREY MEDIA	25	1
47	NY	BUFFALO	BUFFALO	27	BUFFALO NEWS	WBEN	CBS	V	YES			
48	NY	NEW YORK CITY	NEW YORK CITY	1	NEW YORK DAILY NEWS	WPIX	IND	V	NO	TRIBUNE CORPORATION	6	4
49	NY	ROCHESTER	ROCHESTER	59	ROCHESTER TIMES-UNION, DEMOCRAT & CHRONICLE	WHEC	CBS	V	YES	GANNET NEWSPAPERS	22	1
50	NY	SYRACUSE	SYRACUSE	68	SYRACUSE HERALD JOURNAL, HERALD AMERICAN &POST	WSYR	NBC	V	YES	NEWHOUSE NEWSPAPERS	16	6
51	NY	WATERTOWN	WATERTOWN-CARTHAGE	163	WATERTOWN TIMES	WWNY	NBC**	V	YES			
52	NC	GREENSBORO	GREENSBORO-HIGH POINT-WINSTON SALEM	52	GREENSBORO DAILY NEWS & RECORD	WFMY	CBS	V	NO	LANDMARK COMMUNIC.	3	2
53	NC	HICKORY	CHARLOTTE	34	HICKORY RECORD	WHKY	IND	V	YES			
54	ND	FARGO	FARGO	95	FARGO FORUM	WDAY	NBC	V	YES			
55	OHIO	AKRON	CLEVELAND	8	AKRON BEACON JOURNAL	WAKR	ABC	U	NO	KNIGHT NEWSPAPERS	8	1
56	OHIO	CINCINNATI	CINCINNATI	23	CINCINNATI POST & TIMES STAR	WCPO	CBS	V	YES	SCRIPPS-HOWARD	15	5
57	OHIO	CLEVELAND	CLEVELAND	8	CLEVELAND PRESS & NEWS	WEWS	ABC	V	NO	SCRIPPS-HOWARD	15	5
58	OHIO	COLUMBUS	COLUMBUS	32	COLUMBUS DISPATCH	WBNS	CBS	V	YES			
59	OHIO	DAYTON	DAYTON	41	DAYTON NEWS & JOURNAL HERALD	WHIO	CBS	V	NO	J.M. COX	6	5
60	OHIO	YOUNGSTOWN	YOUNGSTOWN	85	YOUNGSTOWN VINDICATOR	WFMJ	NBC	V	YES			
61	OKLA	OKLAHOMA CITY	OKLAHOMA CITY	39	OKLAHOMA CITY OKLAHOMAN & TIMES	WKY	NBC	V	YES			
62	OREG	PORTLAND	PORTLAND	25	PORTLAND OREGONIAN & OREGON JOURNAL	KOIN	CBS	V	NO	NEWHOUSE NEWSPAPERS	16	6
63	PA	ERIE	ERIE	131	ERIE NEWS & TIMES	WSEE	CBS	U	YES			
64	PA	HARRISBURG	HARRISBURG-YORK-LANCASTER-LEBANON	45	HARRISBURG PATRIOT & NEWS	WTPA	ABC	U	NO	NEWHOUSE NEWSPAPERS	16	6
65	PA	JOHNSTOWN	JOHNSTOWN-ALTOONA	71	JOHNSTOWN TRIBUNE-DEMOCRAT	WJAC	NBC	V	YES			

66	PA	LANCASTER	HARRISBURG-YORK-LANCASTER-LEBANON	45	LANCASTER INTELLIGENCER, JOURNAL, NEW ERA & NEWS	WGAL	NBC	V	YES	STEINMAN STATIONS	1	2
67	SC	GREENVILLE	GREENVILLE-SPARTANBURG-ASHEVILLE	38	GREENVILLE NEWS PIEDMONT	WFBC	NBC	V	YES	MULTIMEDIA NEWS	4	1
68	TENN	MEMPHIS	MEMPHIS	31	MEMPHIS COMMERCIAL APPEAL & PRESS SCIMITAR	WMC	NBC	V	NO	SCRIPPS-HOWARD	15	5
69	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS TIMES-HERALD	KDFW	CBS	V	NO	TIMES MIRROR	4	1
70	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS MORNING NEWS	WFAA	ABC	V	YES	A.H. BELO	7	2
71	TEX	HOUSTON	HOUSTON	14	HOUSTON POST	KPRC	NBC	V	YES			
72	TEX	TEMPLE	TEMPLE-WACO	108	TEMPLE TELEGRAM	KCEN	NBC	V	YES			
73	TEX	TEXARKANA	SHREVEPORT-TEXARKANA	58	TEXARKANA GAZETTE & NEWS	KTAL	NBC	V	YES			
74	UTAH	OGDEN	SALT LAKE CITY	50	OGDEN STANDARD	KUTV	NBC	V	NO	STANDARD CORPORATION	1	3
75	UTAH	SALT LAKE CITY	SALT LAKE CITY	50	SALT LAKE CITY DESERET NEWS	KSL	CBS	V	YES	BONNEVILLE INTRNTNL	1	2
76	VA	NORFOLK-PORTSMOUTH	NORFOLK-HAMPTON-PORTSMOUTH-NEWPORT NEWS	46	NORFOLK VIRGINIAN PILOT & LEDGER STAR	WTAR	CBS	V	YES	LANDMARK COMMUNIC	3	2
77	WASH	SPOKANE	SPOKANE	77	SPOKANE SPOKESMAN, REVIEW & CHRONICLE	KHQ	NBC	V	YES			
78	WVA	BLUEFIELD	BLUEFIELD-OAK HILL-BECKLEY	132	BLUEFIELD TELEGRAPH & SUNSET NEWS OBSERVER	WHIS	NBC	V	YES	DAILY TELEGRAPH	1	2
79	WISC	MILWAUKEE	MILWAUKEE	24	MILWAUKEE JOURNAL & SENTINEL	WTMJ	NBC	V	YES			
80	WISC	WAUSAU	WAUSAU-RHINE-LANDER	135	WAUSAU RECORD HERALD	WSAU	CBS	V	YES			

SOURCES: TELEVISION FACTBOOK, 1973-1974 EDITION; BROADCASTING YEARBOOK, 1973; EDITOR AND PUBLISHER, 1973 YEARBOOK

NOTES:

[a] THE DENVER POST HOLDS A CONSTRUCTION PERMIT FOR KHBC. THE STATION WAS NOT ON THE AIR DURING 1973.

[b] A GROUP OWNER IS CONSIDERED "LOCAL" IF HEADQUARTERED IN THE COMBINATION'S HOME CITY.

* ALSO AFFILIATED WITH ABC

** ALSO AFFILIATED WITH ABC AND CBS

TABLE 8

DAILY NEWSPAPER COMPETITION FACING NEWSPAPER-TELEVISION COMBINATIONS

							DAILY NEWSPAPER COMPETITION							
						TV	CITY		COUNTY		SMSA		ADI	
NUMBER	STATE	CITY	AREA OF DOMINANT INFLUENCE	ADI RANK	NAME OF NEWSPAPER	CALL SIGN	COMPETITORS	CITY SHARE	COMPETITORS	COUNTY SHARE	COMPETITORS	SMSA SHARE	COMPETITORS	AD SH
1	ALA	ANNISTON	ANNISTON	193	ANNISTON STAR	WHMA	0	100	0	100		NA[b]	0	100
2	ALA	BIRMINGHAM	BIRMINGHAM	47	BIRMINGHAM NEWS	WAPI	0	100	0	100	1	95	3	84
3	ARK	LITTLE ROCK	LITTLE ROCK	55	ARKANSAS DEMOCRAT	KTHV	1	41	1	41	1	42	4	32
4	CAL	FRESNO	FRESNO	73	FRESNO BEE	KMJ	0	100	0	100	0	100	5	67
5	CAL	SACRAMENTO	SACRAMENTO-STOCKTON	26	SACRAMENTO BEE	KOVR	1	62	1	62	3	60	12	36
6	CAL	SAN FRANCISCO	SAN FRANCISCO	6	SAN FRANCISCO CHRONICLE	KRON	0	100	0	100	15	50	21	40
7	COL	DENVER	DENVER	29	DENVER POST	KHBC[a]	1	53	1	53	4	50	12	45
8	DC	WASHINGTON	WASHINGTON	9	WASHINGTON STAR	WMAL	1	51	1	51	3	44	13	37
9	DC	WASHINGTON	WASHINGTON	9	WASHINGTONPOST	WTOP	1	49	1	49	3	51	13	44
10	FLA	TAMPA	TAMPA-ST PETERSBURG	20	TAMPA TRIBUNE & TIMES	WFLA	0	100	0	100	2	39	7	34
11	GA	ALBANY	ALBANY	148	ALBANY HERALD	WALB	0	100	0	100	0	100	1	80
12	GA	ATLANTA	ATLANTA	17	ATLANTA JOURNAL & CONSTITUTION	WSB	0	100	0	100	2	92	5	84
13	IDA	IDAHO FALLS	IDAHO FALLS-POCATELLO	172	IDAHO FALLS POST REGISTER	KIFI	0	100	0	100		NA	1	58
14	ILL	CHAMPAIGN	SPRINGFIELD-DECATUR-CHAMPAIGN	74	CHAMPAIGN COURIER & NEWS GAZETTE	WCIA	0	100[c]	0	100[c]	0	100[c]	8	25[c]
15	ILL	CHICAGO	CHICAGO	3	CHICAGO TRIBUNE & CHICAGO TODAY	WGN	2	49	11	50	17	47	31	42
16	ILL	CHICAGO	CHICAGO	3	CHICAGO DAILY NEWS & SUN TIMES	WFLD	2	50	11	47	17	42	31	37
17	ILL	QUINCY	QUINCY-HANNIBAL	124	QUINCY HERALD-WHIG	WGEM	0	100	0	100		NA	6	37
18	ILL	ROCK ISLAND	DAVENPORT-ROCK ISLAND-MOLINE	67	ROCK ISLAND ARGUS	WHBF	0	100	1	41	3	19	10	11
19	IND	BLOOMINGTON	INDIANAPOLIS	18	BLOOMINGTON-BEDFORD COURIER TRIBUNE	WTTV	1	d	1	d		NA	1	d
20	IND	ELKHART	SOUTH BEND-ELKHART	87	ELKHART TRUTH	WSJV	0	100	1	71	1	71	5	17
21	IND	SOUTH BEND	SOUTH BEND-ELKHART	87	SOUTH BEND TRIBUNE	WSBT	0	100	0	100	1	91	5	61
22	IND	TERRE HAUTE	TERRE HAUTE	113	TERRE HAUTE STAR & TRIBUNE	WTHI	0	100	0	100	0	100	7	51
23	IOWA	CEDAR RAPIDS	CEDAR RAPIDS-WATERLOO	70	CEDAR RAPIDS GAZETTE	KCRG	0	100	0	100	0	100	6	40
24	IOWA	DES MOINES	DES MOINES	62	DES MOINES REGISTER & TRIBUNE	KRNT	0	100	0	100	0	100	10	71
25	IOWA	MASON CITY	ROCHESTER-MASON CITY-AUSTIN	130	MASON CITY GLOBE GAZETTE	KGLO	0	100	0	100		NA	4	30
26	KAN	TOPEKA	TOPEKA	129	TOPEKA STATE JOURNAL & CAPITAL	WIBW	0	100	0	100	0	100	5	72
27	KY	LOUISVILLE	LOUISVILLE	36	LOUISVILLE COURIER JOURNAL & TIMES	WHAS	0	100	0	100	1	96	5	87
28	KY	PADUCAH	PADUCAH-HARRISBURG-CAPE GIRARDEAU	72	PADUCAH SUN DEMOCRAT	WPSD	0	100	0	100		NA	6	27

29	LA	BATON ROUGE	BATON ROUGE	101	BATON ROUGE ADVOCATE & STATE TIMES	WBRZ	0	100	0	100	0	100	1	96
30	LA	SHREVEPORT	SHREVEPORT-TEXARKANA	58	SHREVEPORT JOURNAL	KSLA	0	100	0	100	0	100	6	59
31	ME	PORTLAND	PORTLAND-POLAND SPRING	75	PORTLAND PRESS HERALD EXPRESS & TELEGRAM	WGAN	0	100	0	100	0	100	7	43
32	MD	BALTIMORE	BALTIMORE	19	BALTIMORE NEWS AMERICAN	WBAL	1	36	1	36	2	35	3	34
33	MD	BALTIMORE	BALTIMORE	19	BALTIMORE SUN	WMAR	1	64	1	64	2	62	3	61
34	MICH	DETROIT	DETROIT	7	DETROIT NEWS	WWJ	1	62	2	61	6	49	9	46
35	MINN	DULUTH	DULUTH-SUPERIOR	110	DULUTH NEWS TRIBUNE & HERALD	WDSM	0	100	2	73	3	65	5	62
36	MINN	MINNEAPOLIS-ST PAUL	MINNEAPOLIS-ST PAUL	13	MINNEAPOLIS STAR & TRIBUNE; ST PAUL PIONEER PRESS & DISPATCH	WCCO	0	100[c]	0	100[c,e]	0	100[c]	7	89[c]
37	MISS	COLUMBUS	COLUMBUS	165	COLUMBUS COMMERCIAL DISPATCH	WCBI	0	100	0	100		NA	0	100
38	MISS	JACKSON	JACKSON	80	JACKSON CLARION-LEDGER & NEWS	WJTV	0	100	0	100	0	100	2	80
39	MISS	MERIDIAN	MERIDIAN	162	MERIDIAN STAR	WTOK	0	100	0	100	0	100	0	100
40	MO	JOPLIN	JOPLIN-PITTSBURG	118	JOPLIN GLOBE	KODAM	0	100	1	76	1	81	9	36
41	MO	ST LOUIS	ST LOUIS	12	ST LOUIS POST DISPATCH	KSD	1	59	1	59	5	46	8	43
42	MO	ST LOUIS	ST LOUIS	12	ST LOUIS GLOBE DEMOCRAT	KTVI	1	41	1	41	5	38	8	37
43	MO	SPRINGFIELD	SPRINGFIELD	88	SPINGFIED LEADER,NEWS & PRESS	KYTV	0	100	0	100	0	100	2	90
44	NEB	HASTINGS	LINCOLN-HASTINGS KEARNY	81	HASTINGS TRIBUNE	KHAS	0	100	0	100		NA	7	12
45	NEB	OMAHA	OMAHA	63	OMAHA WORLD HERALD	KETV	0	100	0	100	1	89	6	77
46	NEV	LAS VEGAS	LAS VEGAS	144	LAS VEGAS REVIEW-JOURNAL	KORK	1	61	1	61	1	61	1	61
47	NY	BUFFALO	BUFFALO	27	BUFFALO NEWS	WBEN	1	70	1	71	4	58	12	48
48	NY	NEW YORK CITY	NEW YORK CITY	1	NEW YORK DAILY NEWS	WPIX	2	34[f]	5	50[f]	15	44	42	32
49	NY	ROCHESTER	ROCHESTER	59	ROCHESTER TIMES-UNION, DEMOCRAT & CHRONICLE	WHEC	0	100	0	100	3	93	3	93
50	NY	SYRACUSE	SYRACUSE	68	SYRACUSE HERALD JOURNAL, HERALD AMERICAN &POST	WSYR	0	100	0	100	2	91	5	76
51	NY	WATERTOWN	WATERTOWN-CARTHAGE	163	WATERTOWN TIMES	WWNY	0	100	0	100		NA	1	87
52	NC	GREENSBORO	GREENSBORO-HIGH POINT-WINSTON SALEM	52	GREENSBORO DAILY NEWS & RECORD	WFMY	0	100	1	79	5	35	6	35
53	NC	HICKORY	CHARLOTTE	34	HICKORY RECORD	WHKY	0	100	0	100		NA	11	7
54	ND	FARGO	FARGO	95	FARGO FORUM	WDAY	0	100	0	100	0	100	4	51
55	OHIO	AKRON	CLEVELAND	8	AKRON BEACON JOURNAL	WAKR	0	100	0	100	1	87	24	13
56	OHIO	CINCINNATI	CINCINNATI	23	CINCINNATI POST & TIMES STAR	WCPO	1	52	1	52	1	55	6	45
57	OHIO	CLEVELAND	CLEVELAND	8	CLEVELAND PRESS & NEWS	WEWS	1	52	1	52	5	48	24	27
58	OHIO	COLUMBUS	COLUMBUS	32	COLUMBUS DISPATCH	WBNS	0	100	0	100	4	89	13	69
59	OHIO	DAYTON	DAYTON	41	DAYTON NEWS & JOURNAL HERALD	WHIO	0	100	0	100	3	87	10	63
60	OHIO	YOUNGSTOWN	YOUNGSTOWN	85	YOUNGSTOWN VINDICATOR	WFMJ	0	100	0	100	2	66	4	55
61	OKLA	OKLAHOMA CITY	OKLAHOMA CITY	39	OKLAHOMA CITY OKLAHOMAN & TIMES	WKY	1	79	1	79	3	74	13	62
62	OREG	PORTLAND	PORTLAND	25	PORTLAND OREGONIAN & OREGON JOURNAL	KOIN	0	100	0	100	1	89	8	65
63	PA	ERIE	ERIE	131	ERIE NEWS & TIMES	WSEE	0	100	0	100	0	100	3	68
64	PA	HARRISBURG	HARRISBURG-YORK-LANCASTER-LEBANON	45	HARRISBURG PATRIOT & NEWS	WTPA	0	100	0	100	1	89	9	32
65	PA	JOHNSTOWN	JOHNSTOWN-ALTOONA	71	JOHNSTOWN TRIBUNE-DEMOCRAT	WJAC	0	100	0	100	1	89	14	27

66	PA	LANCASTER	HARRISBURG-YORK-LANCASTER-LEBANON	45	LANCASTER INTELLIGENCER, JOURNAL, NEW ERA & NEWS	WGAL	0	100	1	96		NA	9	26
67	SC	GREENVILLE	GREENVILLE-SPARTANBURG-ASHEVILLE	38	GREENVILLE NEWS PIEDMONT	WFBC	0	100	0	100	1	67	6	37
68	TENN	MEMPHIS	MEMPHIS	31	MEMPHIS COMMERCIAL APPEAL & PRESS SCIMITAR	WMC	0	100	0	100	0	100	6	89
69	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS TIMES-HERALD	KDFW	1	52	5	47	12	30	20	26
70	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS MORNING NEWS	WFAA	1	48	5	43	12	28	20	26
71	TEX	HOUSTON	HOUSTON	14	HOUSTON POST	KPRC	1	48	3	45	4	45	7	43
72	TEX	TEMPLE	TEMPLE-WACO	108	TEMPLE TELEGRAM	KCEN	0	100	1	65	1	62	4	24
73	TEX	TEXARKANA	SHREVEPORT-TEXARKANA	58	TEXARKANA GAZETTE & NEWS	KTAL	0	100	0	100	0	100	6	15
74	UTAH	OGDEN	SALT LAKE CITY	50	OGDEN STANDARD	KUTV	0	100	0	100	1	23	6	17
75	UTAH	SALT LAKE CITY	SALT LAKE CITY	50	SALT LAKE CITY DESERET NEWS	KSL	0	100	0	100	1	77	6	68
76	VA	NORFOLK-PORTSMOUTH	NORFOLK-HAMPTON-PORTSMOUTH-NEWPORT NEWS	46	NORFOLK VIRGINIAN PILOT & LEDGER STAR	WTAR	0	100	0	100	0	100	3	67
77	WASH	SPOKANE	SPOKANE	77	SPOKANE SPOKESMAN, REVIEW & CHRONICLE	KHQ	0	100	0	100	0	100	6	74
78	WVA	BLUEFIELD	BLUEFIELD-OAK HILL-BECKLEY	132	BLUEFIELD TELEGRAPH & SUNSET NEWS OBSERVER	WHIS	0	100	0	100		NA	3	37
79	WISC	MILWAUKEE	MILWAUKEE	24	MILWAUKEE JOURNAL & SENTINEL	WTMJ	0	100	0	100	2	94	6	80
80	WISC	WAUSAU	WAUSAU-RHINE-LANDER	135	WAUSAU RECORD HERALD	WSAU	0	100	0	100		NA	5	33

SOURCES: TELEVISION FACTBOOK, 1973-1974 EDITION; CIRCULATION 73-74

NOTES:

[a] THE DENVER POST HOLDS A CONSTRUCTION PERMIT FOR KHBC. THE STATION WAS NOT ON THE AIR DURING 1973.

[b] NA IS ENTERED FOR THOSE CITIES NOT INCLUDED IN AN SMSA AS OF NOVEMBER 1, 1973.

[c] TWO NEWSPAPERS EACH OWN PART OF THE TELEVISION STATION.CONSEQUENTLY, THEIR NEWSPAPER CIRCULATION SHARES ARE COMBINED.

[d] CIRCULATION FIGURES NOT REPORTED.

[e] INCLUDES BOTH HENNEPIN (MINNEAPOLIS) AND RAMSEY (ST.PAUL) COUNTIES.

[f] "CITY" INCLUDES MANHATTAN ONLY. "COUNTY" INLUDES THE FIVE BOROUGHS OF NEW YORK.

TABLE 9

COMMERCIAL TELEVISION COMPETITION FACING NEWSPAPER-TELEVISION COMBINATIONS

COMMERCIAL TELEVISION COMPETITION [a,b]

NUMBER	STATE	CITY	AREA OF DOMINANT INFLUENCE	ADI RANK	NAME OF NEWSPAPER	TV CALL SIGN	CITY				COUNTY				SMSA				ADI			
							TOT	VHF	UHF	PRIME SHARE	TOT	VHF	UHF	PRIME SHARE	TOT	VHF	UHF	PRIME SHARE	TOT	VHF	UHF	PRIME SHARE
1	ALA	ANNISTON	ANNISTON	193	ANNISTON STAR	WHMA	0	0	0	100	0	0	0	100				NA [c]	0	0	0	100
2	ALA	BIRMINGHAM	BIRMINGHAM	47	BIRMINGHAM NEWS	WAPI	2	1	1	32	2	1	1	32	2	1	1	32	2	1	1	29
3	ARK	LITTLE ROCK	LITTLE ROCK	55	ARKANSAS DEMOCRAT	KTHV	2	2	0	33	2	2	0	33	2	2	0	33	2	2	0	30
4	CAL	FRESNO	FRESNO	73	FRESNO BEE	KMJ	3	0	3	36	3	0	3	36	3	0	3	32	5	0	5	32
5	CAL	SACRAMENTO	SACRAMENTO-STOCKTON	26	SACRAMENTO BEE	KOVR	3	2	1	24	3	2	1	24	3	2	1	34	4	2	2	31
6	CAL	SAN FRANCISCO	SAN FRANCISCO	6	SAN FRANCISCO CHRONICLE	KRON	6	3	3	25	6	3	3	25	6	3	3	28	9	4	5	26
7	COL	DENVER	DENVER	29	DENVER POST	KHBC [d]	4	4	0		4	4	0		4	4	0		4	4	0	
8	DC	WASHINGTON	WASHINGTON	9	WASHINGTON STAR	WMAL	4	3	1	26	4	3	1	26	4	3	1	33	5	3	2	31
9	DC	WASHINGTON	WASHINGTON	9	WASHINGTONPOST	WTOP	4	3	1	26	4	3	1	26	4	3	1	29	5	3	2	28
10	FLA	TAMPA	TAMPA-ST PETERSBURG	20	TAMPA TRIBUNE & TIMES	WFLA	4	2	2	36	4	2	2	36	4	2	2	36	5	2	3	37
11	GA	ALBANY	ALBANY	148	ALBANY HERALD	WALB	0	0	0	100	0	0	0	100	0	0	0	100	0	0	0	100
12	GA	ATLANTA	ATLANTA	17	ATLANTA JOURNAL & CONSTITUTION	WSB	4	2	2	37	4	2	2	37	4	2	2	33	4	2	2	31
13	IDA	IDAHO FALLS	IDAHO FALLS-POCATELLO	172	IDAHO FALLS POST REGISTER	KIFI	1	1	0	55	1	1	0	55				NA	1	1	0	45
14	ILL	CHAMPAIGN	SPRINGFIELD-DECATUR-CHAMPAIGN	74	CHAMPAIGN COURIER & NEWS GAZETTE	WCIA	1	0	1	66	1	0	1	66	1	0	1	68	3	0	3	40
15	ILL	CHICAGO	CHICAGO	3	CHICAGO TRIBUNE & CHICAGO TODAY	WGN	6	3	3	12	6	3	3	12	6	3	3	10	6	3	3	10
16	ILL	CHICAGO	CHICAGO	3	CHICAGO DAILY NEWS & SUN TIMES	WFLD	6	4	2	3	6	4	2	3	6	4	2	3	6	4	2	3
17	ILL	QUINCY	QUINCY-HANNIBAL	124	QUINCY HERALD-WHIG	WGEM	0	0	0	100	0	0	0	100				NA	1	1	0	45
18	ILL	ROCK ISLAND	DAVENPORT-ROCK ISLAND-MOLINE	67	ROCK ISLAND ARGUS	WHBF	0	0	0	100	0	0	0	100	2	2	0	38	2	2	0	37
19	IND	BLOOMINGTON	INDIANAPOLIS	18	BLOOMINGTON-BEDFORD COURIER TRIBUNE	WTTV	0	0	0	100	0	0	0	100				NA	4	3	1	10
20	IND	ELKHART	SOUTH BEND-ELKHART	87	ELKHART TRUTH	WSJV	0	0	0	100	0	0	0	100	0	0	0	100	2	0	2	31
21	IND	SOUTH BEND	SOUTH BEND-ELKHART	87	SOUTH BEND TRIBUNE	WSBT	1	0	1	55	1	0	1	55	1	0	1	57	2	0	2	35
22	IND	TERRE HAUTE	TERRE HAUTE	113	TERRE HAUTE STAR & TRIBUNE	WTHI	2	1	1	57	2	1	1	57	2	1	1	47	2	1	1	58
23	IOWA	CEDAR RAPIDS	CEDAR RAPIDS-WATERLOO	70	CEDAR RAPIDS GAZETTE	KCRG	2	2	0	37	2	2	0	37	2	2	0	33	3	2	1	25
24	IOWA	DES MOINES	DES MOINES	62	DES MOINES REGISTER & TRIBUNE	KRNT	2	2	0	41	2	2	0	41	2	2	0	39	3	2	1	32
25	IOWA	MASON CITY	ROCHESTER-MASON CITY-AUSTIN	130	MASON CITY GLOBE GAZETTE	KGLO	0	0	0	100	0	0	0	100				NA	2	2	0	36
26	KAN	TOPEKA	TOPEKA	129	TOPEKA STATE JOURNAL & CAPITAL	WIBW	1	0	1	67	1	0	1	67	1	0	1	70	1	0	1	76
27	KY	LOUISVILLE	LOUISVILLE	36	LOUISVILLE COURIER JOURNAL & TIMES	WHAS	3	1	2	33	3	1	2	33	3	1	2	35	3	1	2	36
28	KY	PADUCAH	PADUCAH-HARRISBURG-CAPE GIRARDEAU	72	PADUCAH SUN DEMOCRAT	WPSD	1	0	1	67	1	0	1	67				NA	3	2	1	35

29	LA	BATON ROUGE	BATON ROUGE	101	BATON ROUGE ADVOCATE & STATE TIMES	WBRZ	2 1 1	41	2 1 1	41	2 1 1	41	2 1 1	42
30	LA	SHREVEPORT	SHREVEPORT-TEXARKANA	58	SHREVEPORT JOURNAL	KSLA	1 1 0	55	1 1 0	55	1 1 0	40	2 2 0	39
31	ME	PORTLAND	PORTLAND-POLAND SPRING	75	PORTLAND PRESS HERALD EXPRESS & TELEGRAM	WGAN	1 1 0	50	2 2 0	39	2 2 0	51	3 2 1	33
32	MD	BALTIMORE	BALTIMORE	19	BALTIMORE NEWS AMERICAN	WBAL	3 2 1	30	3 2 1	30	3 2 1	29	3 2 1	32
33	MD	BALTIMORE	BALTIMORE	19	BALTIMORE SUN	WMAR	3 2 1	38	3 2 1	38	3 2 1	35	3 2 1	34
34	MICH	DETROIT	DETROIT	7	DETROIT NEWS	WWJ	4 2 2	34	4 2 2	34	5 3 2	29	5 3 2	29
35	MINN	DULUTH	DULUTH-SUPERIOR	110	DULUTH NEWS TRIBUNE & HERALD	WDSM	2 2 0	28	2 2 0	28	2 2 0	26	2 2 0	24
36	MINN	MINNEAPOLIS-ST PAUL	MINNEAPOLIS-ST PAUL	13	MINNEAPOLIS STAR & TRIBUNE; ST PAUL PIONEER PRESS & DISPATCH	WCCO	3 3 0	45	3 3 0	45	3 3 0	34	3 3 0	32
37	MISS	COLUMBUS	COLUMBUS	165	COLUMBUS COMMERCIAL DISPATCH	WCBI	0 0 0	100	0 0 0	100		NA	0 0 0	100
38	MISS	JACKSON	JACKSON	80	JACKSON CLARION-LEDGER & NEWS	WJTV	2 1 1	38	2 1 1	38	2 1 1	41	2 1 1	42
39	MISS	MERIDIAN	MERIDIAN	162	MERIDIAN STAR	WTOK	1 0 1	99	1 0 1	99		NA	1 0 1	100[e]
40	MO	JOPLIN	JOPLIN-PITTSBURG	118	JOPLIN GLOBE	KOAM	2 1 1	32	2 1 1	32	2 1 1	34	2 1 1	41
41	MO	ST LOUIS	ST LOUIS	12	ST LOUIS POST DISPATCH	KSD	4 3 1	28	4 3 1	28	4 3 1	29	4 3 1	29
42	MO	ST LOUIS	ST LOUIS	12	ST LOUIS GLOBE DEMOCRAT	KTVI	4 3 1	27	4 3 1	27	4 3 1	28	4 3 1	26
43	MO	SPRINGFIELD	SPRINGFIELD	88	SPINGFIED LEADER,NEWS & PRESS	KYTV	2 1 1	37	2 1 1	37	2 1 1	31	2 1 1	44
44	NEB	HASTINGS	LINCOLN-HASTINGS KEARNY	81	HASTINGS TRIBUNE	KHAS	0 0 0	100	0 0 0	100		NA	2 2 0	12
45	NEB	OMAHA	OMAHA	63	OMAHA WORLD HERALD	KETV	2 2 0	33	2 2 0	33	2 2 0	38	2 2 0	34
46	NEV	LAS VEGAS	LAS VEGAS	144	LAS VEGAS REVIEW-JOURNAL	KORK	2 2 0	37	3 3 0	35	3 3 0	30	3 3 0	30
47	NY	BUFFALO	BUFFALO	27	BUFFALO NEWS	WBEN	3 2 1	34	3 2 1	34	3 2 1	31	3 2 1	32
48	NY	NEW YORK CITY	NEW YORK CITY	1	NEW YORK DAILY NEWS	WPIX	6 5 1	4[f]	6 5 1	5[f]	6 5 1	5	7 6 2	4
49	NY	ROCHESTER	ROCHESTER	59	ROCHESTER TIMES-UNION, DEMOCRAT & CHRONICLE	WHEC	2 2 0	36	2 2 0	36	2 2 0	34	2 2 0	34
50	NY	SYRACUSE	SYRACUSE	68	SYRACUSE HERALD JOURNAL, HERALD AMERICAN &POST	WSYR	2 2 0	34	2 2 0	34	2 2 0	30	2 2 0	27
51	NY	WATERTOWN	WATERTOWN-CARTHAGE	163	WATERTOWN TIMES	WWNY	0 0 0	100	0 0 0	100		NA	0 0 0	100
52	NC	GREENSBORO	GREENSBORO-HIGH POINT-WINSTON SALEM	52	GREENSBORO DAILY NEWS & RECORD	WFMY	0 0 0	100	1 1 0	38	2 2 0	38	2 2 0	36
53	NC	HICKORY	CHARLOTTE	34	HICKORY RECORD	WHKY	0 0 0	9	0 0 0	9		NA	4 2 2	9
54	ND	FARGO	FARGO	95	FARGO FORUM	WDAY	1 1 0	53	1 1 0	53	1 1 0	55	2 2 0	24
55	OHIO	AKRON	CLEVELAND	8	AKRON BEACON JOURNAL	WAKR	0 0 0	100	0 0 0	100	0 0 0	100	5 3 2	1
56	OHIO	CINCINNATI	CINCINNATI	23	CINCINNATI POST & TIMES STAR	WCPO	3 2 1	36	3 2 1	36	3 2 1	38	3 2 1	37
57	OHIO	CLEVELAND	CLEVELAND	8	CLEVELAND PRESS & NEWS	WEWS	3 2 1	32	4 2 2	30	4 2 2	34	5 2 3	32
58	OHIO	COLUMBUS	COLUMBUS	32	COLUMBUS DISPATCH	WBNS	2 2 0	37	2 2 0	37	2 2 0	44	2 2 0	42
59	OHIO	DAYTON	DAYTON	41	DAYTON NEWS & JOURNAL HERALD	WHIO	2 1 1	44	2 1 1	44	2 1 1	44	2 1 1	46
60	OHIO	YOUNGSTOWN	YOUNGSTOWN	85	YOUNGSTOWN VINDICATOR	WFMJ	2 0 2	35	2 0 2	35	2 0 2	32	2 0 2	32
61	OKLA	OKLAHOMA CITY	OKLAHOMA CITY	39	OKLAHOMA CITY OKLAHOMAN & TIMES	WKY	2 2 0	37	2 2 0	37	2 2 0	31	3 3 0	31
62	OREG	PORTLAND	PORTLAND	25	PORTLAND OREGONIAN & OREGON JOURNAL	KOIN	3 3 0	31	3 3 0	31	3 3 0	33	4 4 0	33
63	PA	ERIE	ERIE	131	ERIE NEWS & TIMES	WSEE	2 1 1	32	2 1 1	32	2 1 1	33	2 1 1	28
64	PA	HARRISBURG	HARRISBURG-YORK-LANCASTER-LEBANON	45	HARRISBURG PATRIOT & NEWS	WTPA	1 1 0	49	1 1 0	49	1 1 0	54	4 1 3	26
65	PA	JOHNSTOWN	JOHNSTOWN-ALTOONA	71	JOHNSTOWN TRIBUNE-DEMOCRAT	WJAC	1 0 1	82	1 0 1	82	1 0 1	86	2 1 1	44

66	PA	LANCASTER	HARRISBURG-YORK-LANCASTER-LEBANON	45	LANCASTER INTELLIGENCER, JOURNAL, NEW ERA & NEWS	WGAL	1 0 1	77	1 0 1	77	1 0 1	83	4 0 4	41
67	SC	GREENVILLE	GREENVILLE-SPARTANBURG-ASHEVILLE	38	GREENVILLE NEWS PIEDMONT	WFBC	1 0 1	41	1 0 1	41	2 1 1	34	5 2 3	32
68	TENN	MEMPHIS	MEMPHIS	31	MEMPHIS COMMERCIAL APPEAL & PRESS SCIMITAR	WMC	2 2 0	32	2 2 0	32	2 2 0	29	2 2 0	29
69	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS TIMES-HERALD	KDFW	3 1 2	43	3 1 2	43	5 3 2	31	5 3 2	31
70	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS MORNING NEWS	WFAA	3 1 2	51	3 1 2	51	5 3 2	35	5 3 2	33
71	TEX	HOUSTON	HOUSTON	14	HOUSTON POST	KPRC	4 2 2	33	4 2 2	33	4 2 2	29	4 2 2	28
72	TEX	TEMPLE	TEMPLE-WACO	108	TEMPLE TELEGRAM	KCEN	0 0 0	100	0 0 0	100	0 0 0	100	1 1 0	40
73	TEX	TEXARKANA	SHREVEPORT-TEXARKANA	58	TEXARKANA GAZETTE & NEWS	KTAL	0 0 0	100	0 0 0	100	0 0 0	100	2 2 0	23
74	UTAH	OGDEN	SALT LAKE CITY	50	OGDEN STANDARD	KUTV	2 2 0	30	2 2 0	30	2 2 0	23	2 2 0	23
75	UTAH	SALT LAKE CITY	SALT LAKE CITY	50	SALT LAKE CITY DESERET NEWS	KSL	2 2 0	32	2 2 0	32	2 2 0	35	2 2 0	34
76	VA	NORFOLK-PORTSMOUTH	NORFOLK-HAMPTON-PORTSMOUTH-NEWPORT NEWS	46	NORFOLK VIRGINIAN PILOT & LEDGER STAR	WTAR	0 0 0	100	2 1 1	54	2 1 1	42	3 2 1	42
77	WASH	SPOKANE	SPOKANE	77	SPOKANE SPOKESMAN, REVIEW & CHRONICLE	KHQ	2 2 0	36	2 2 0	36	2 2 0	33	2 2 0	28
78	WVA	BLUEFIELD	BLUEFIELD-OAK HILL-BECKLEY	132	BLUEFIELD TELEGRAPH & SUNSET NEWS OBSERVER	WHIS	0 0 0	100	0 0 0	100		NA	1 1 0	60
79	WISC	MILWAUKEE	MILWAUKEE	24	MILWAUKEE JOURNAL & SENTINEL	WTMJ	3 2 1	32	3 2 1	32	3 2 1	31	3 2 1	30
80	WISC	WAUSAU	WAUSAU-RHINELANDER	135	WAUSAU RECORD HERALD	WSAU	1 1 0	59	1 1 0	59		NA	2 2 0	55

SOURCES: TELEVISION FACTBOOK, 1973-1974 EDITION; ARBITRON SHARE OF HOURS STUDY: 1973 COUNTY REPORTS; ARBITRON TELEVISION DAY-PART AUDIENCE SUMMARY, NOVEMBER 1973; RAND-MCNALLY 1974 COMMERCIAL ATLAS AND MARKETING GUIDE.

NOTES:

[a] EDUCATIONAL TELEVISION STATIONS ARE NOT INCLUDED IN THE COUNTS OF COMPETING TELEVISION STATIONS, NOR ARE THEIR AUDIENCES CONSIDERED IN MEASURING THE PRIME TIME SHARES OF CROSSOWNED STATIONS. SATELLITES OF COMPETING STATIONS ARE ALSO EXCLUDED FROM THE COUNTS OF COMPETING STATIONS. SATELLITES' AUDIENCES ARE, HOWEVER, INCLUDED AS PART OF THEIR PARENT STATION'S AUDIENCE IF THE SATELLITE OPERATES WITHIN THE APPROPRIATE GEOGRAPHIC BOUNDS.

[b] CITY AND COUNTY SHARES ARE BOTH CALCULATED FROM THE ARBITRON 1973 COUNTY REPORTS BASED ON MAY AND NOVEMBER 1972 AND FEBRUARY/MARCH 1973 SURVEYS. THE CITY SHARE IS ACTUALLY THE HOME COUNTY SHARE OF THE CROSSOWNED STATION EXPRESSED AS A PERCENTAGE OF THE SUM OF THE COUNTY SHARES OF ALL STATIONS BASED IN THE CITY. THE COUNTY SHARE IS THE CROSSOWNED STATION'S SHARE EXPRESSED AS A PERCENTAGE OF THE SHARES OF ALL COUNTY BASED STATIONS. THE SMSA AND ADI SHARES ARE CALCULATED FROM THE ARBITRON DAY PART AUDIENCE SUMMARY FOR NOVEMBER 1973. THE DIFFERENCE IN SURVEY PERIODS MAY ACCOUNT FOR SOME SHIFTS BETWEEN CITY AND COUNTY SHARES ON THE ONE HAND AND SMSA AND ADI SHARES ON THE OTHER.

[c] NA IS ENTERED FOR THOSE COMMUNITIES WHICH WERE NOT PART OF AN SMSA AS OF NOVEMBER 1, 1973.

[d] KHBC HAS BEEN GRANTED A CONSTRUCTION PERMIT BUT WAS NOT ON THE AIR DURING 1973.

[e] WHTV, THE ADI COMPETITOR OF WTOK, IS NOT LISTED IN THE DAY-PART AUDIENCE SUMMARY. ITS SHARE WAS ASSUMED TO BE 0.

[f] "CITY" INCLUDES MANHATTAN ONLY. "COUNTY" INCLUDES THE FIVE BOROUGHS OF NEW YORK.

[g] AUDIENCE SHARES FOR WHKY ARE NOT AVAILABLE.

Table 10: CONCENTRATION INDICES FOR
NEWSPAPER-TELEVISION COMBINATIONS USING FOUR DIFFERENT MEDIA WEIGHTINGS

NUMBER	STATE	CITY	AREA OF DOMINANT INFLUENCE	ADI RANK	NAME OF NEWSPAPER	TV CALL SIGN	RADIO STATIONS #CO-OWNED	RADIO STATIONS # IN CITY	CONCENTRATION INDICES IN CITY OF LICENSE: DEJONCKHEERE 40-40-20	LITWIN 44-39-17	ROPER INFORMATION 47-37-16	ROPER BELIEVABILITY 62-28-10
1	ALA	ANNISTON	ANNISTON	193	ANNISTON STAR	WHMA	2	4	90	92	92	95
2	ALA	BIRMINGHAM	BIRMINGHAM	47	BIRMINGHAM NEWS	WAPI	2	16	56	55	54	49
3	ARK	LITTLE ROCK	LITTLE ROCK	55	ARKANSAS DEMOCRAT	KTHV	0	10	26	31	31	31
4	CAL	FRESNO	FRESNO	73	FRESNO BEE	KMJ	2	16	57	57	56	51
5	CAL	SACRAMENTO	SACRAMENTO-STOCKTON	26	SACRAMENTO BEE	KOVR	2	15	38	37	36	33
6	CAL	SAN FRANCISCO	SAN FRANCISCO	6	SAN FRANCISCO CHRONICLE	KRON	1	26	51	51	50	44
7	COL	DENVER	DENVER	29	DENVER POST	KHBC	0	20	a	a	a	a
8	DC	WASHINGTON	WASHINGTON	9	WASHINGTON STAR	WMAL	2	16	33	33	33	31
9	DC	WASHINGTON	WASHINGTON	9	WASHINGTONPOST	WTOP	1	16	31	31	31	31
10	FLA	TAMPA	TAMPA-ST PETERSBURG	20	TAMPA TRIBUNE & TIMES	WFLA	2	11	58	58	57	52
11	GA	ALBANY	ALBANY	148	ALBANY HERALD	WALB	0	7	80	83	84	90
12	GA	ATLANTA	ATLANTA	17	ATLANTA JOURNAL & CONSTITUTION	WSB	2	16	58	57	56	52
13	IDA	IDAHO FALLS	IDAHO FALLS-POCATELLO	172	IDAHO FALLS POST REGISTER	KIFI	0	5	62	63	63	62
14	ILL	CHAMPAIGN	SPRINGFIELD-DECATUR-CHAMPAIGN	74	CHAMPAIGN COURIER & NEWS GAZETTE	WCIA	2	5	74	75	74	73
15	ILL	CHICAGO	CHICAGO	3	CHICAGO TRIBUNE & CHICAGO TODAY	WGN	1	28	26	25	25	21
16	ILL	CHICAGO	CHICAGO	3	CHICAGO DAILY NEWS & SUN TIMES	WFLD	0	28	21	21	20	16
17	ILL	QUINCY	QUINCY-HANNIBAL	174	QUINCY HERALD-WHIG	WGEM	2	4	90	92	92	95
18	ILL	ROCK ISLAND	DAVENPORT-ROCK ISLAND-MOLINE	67	ROCK ISLAND ARGUS	WHBF	2	2	100	100	100	100
19	IND	BLOOMINGTON	INDIANAPOLIS	18	BLOOMINGTON-BEDFORD COURIER TRIBUNE	WTTV	2	2	73[b]	74[b]	75[b]	81[b]
20	IND	ELKHART	SOUTH BEND-ELKHART	87	ELKHART TRUTH	WSJV	2	4	90	92	92	95
21	IND	SOUTH BEND	SOUTH BEND-ELKHART	87	SOUTH BEND TRIBUNE	WSBT	2	7	68	68	68	65
22	IND	TERRE HAUTE	TERRE HAUTE	113	TERRE HAUTE STAR & TRIBUNE	WTHI	2	7	69	69	69	66
23	IOWA	CEDAR RAPIDS	CEDAR RAPIDS-WATERLOO	70	CEDAR RAPIDS GAZETTE	KCRG	1	6	58	58	57	53
24	IOWA	DES MOINES	DES MOINES	62	DES MOINES REGISTER & TRIBUNE	KRNT	2	11	60	60	59	55
25	IOWA	MASON CITY	ROCHESTER-MASON CITY-AUSTIN	130	MASON CITY GLOBE GAZETTE	KGLO	1	4	85	87	88	93
26	KAN	TOPEKA	TOPEKA	129	TOPEKA STATE JOURNAL & CAPITAL	WIBW	2	7	73	73	73	73
27	KY	LOUISVILLE	LOUISVILLE	36	LOUISVILLE COURIER JOURNAL & TIMES	WHAS	2	12	56	57	56	50
28	KY	PADUCAH	PADUCAH-HARRISBURG-CAPE GIRARDEAU	72	PADUCAH SUN DEMOCRAT	WPSD	0	5	67	68	68	70

29	LA	BATON ROUGE	BATON ROUGE	101	BATON ROUGE ADVOCATE & STATE TIMES	WBRZ	2	11	60	60	59	55
30	LA	SHREVEPORT	SHREVEPORT-TEXARKANA	58	SHREVEPORT JOURNAL	KSLA	2	11	66	66	66	64
31	ME	PORTLAND	PORTLAND-POLAND SPRING	75	PORTLAND PRESS HERALD EXPRESS & TELEGRAM	WGAN	2	7	66	66	66	62
32	MD	BALTIMORE	BALTIMORE	19	BALTIMORE NEWS AMERICAN	WBAL	2	18	28	30	29	30
33	MD	BALTIMORE	BALTIMORE	19	BALTIMORE SUN	WMAR	1	18	42	43	43	43
34	MICH	DETROIT	DETROIT	7	DETROIT NEWS	WWJ	2	21	41	41	41	39
35	MINN	DULUTH	DULUTH-SUPERIOR	110	DULUTH NEWS TRIBUNE & HERALD	WDSM	1	7	54	53	52	46
36	MINN	MINNEAPOLIS-ST PAUL	MINNEAPOLIS-ST PAUL	13	MINNEAPOLIS STAR & TRIBUNE; ST PAUL PIONEER PRESS & DISPATCH	WCCO	2	16	61	61	60	57
37	MISS	COLUMBUS	COLUMBUS	165	COLUMBUS COMMERCIAL DISPATCH	WCBI	1	4	85	87	88	93
38	MISS	JACKSON	JACKSON	80	JACKSON CLARION-LEDGER & NEWS	WJTV	2	12	58	59	58	54
39	MISS	MERIDIAN	MERIDIAN	162	MERIDIAN STAR	WTOK	1	7	83	85	86	90
40	MO	JOPLIN	JOPLIN-PITTSBURG	118	JOPLIN GLOBE	KOAM	0	5	53	53	52	48
41	MO	ST LOUIS	ST LOUIS	12	ST LOUIS POST DISPATCH	KSD	1	15	36	36	36	35
42	MO	ST LOUIS	ST LOUIS	12	ST LOUIS GLOBE DEMOCRAT	KTVI	0	15	27	28	28	28
43	MO	SPRINGFIELD	SPRINGFIELD	88	SPINGFIED LEADER,NEWS & PRESS	KYTV	1	9	57	57	56	52
44	NEB	HASTINGS	LINCOLN-HASTINGS KEARNY	81	HASTINGS TRIBUNE	KHAS	1	3	87	89	89	93
45	NEB	OMAHA	OMAHA	63	OMAHA WORLD HERALD	KETV	0	12	53	54	53	48
46	NEV	LAS VEGAS	LAS VEGAS	144	LAS VEGAS REVIEW-JOURNAL	KORK	2	10	43	43	43	42
47	NY	BUFFALO	BUFFALO	27	BUFFALO NEWS	WBEN	2	15	45	44	44	42
48	NY	NEW YORK CITY	NEW YORK CITY	1	NEW YORK DAILY NEWS	WPIX	1	29	17	16	16	12
49	NY	ROCHESTER	ROCHESTER	59	ROCHESTER TIMES-UNION, DEMOCRAT & CHRONICLE	WHEC	0	12	54	55	54	50
50	NY	SYRACUSE	SYRACUSE	68	SYRACUSE HERALD JOURNAL, HERALD AMERICAN &POST	WSYR	2	10	58	57	56	51
51	NY	WATERTOWN	WATERTOWN-CARTHAGE	163	WATERTOWN TIMES	WWNY	1	4	85	87	88	93
52	NC	GREENSBORO	GREENSBORO-HIGH POINT-WINSTON SALEM	52	GREENSBORO DAILY NEWS & RECORD	WFMY	0	7	80	83	84	90
53	NC	HICKORY	CHARLOTTE	34	HICKORY RECORD	WHKY	2	5	88	90	90	94
54	ND	FARGO	FARGO	95	FARGO FORUM	WDAY	2	4	71	71	70	66
55	OHIO	AKRON	CLEVELAND	8	AKRON BEACON JOURNAL	WAKR	2	5	88	90	90	94
56	OHIO	CINCINNATI	CINCINNATI	23	CINCINNATI POST & TIMES STAR	WCPO	0	13	35	36	36	37
57	OHIO	CLEVELAND	CLEVELAND	8	CLEVELAND PRESS & NEWS	WEWS	0	17	34	34	34	35
58	OHIO	COLUMBUS	COLUMBUS	32	COLUMBUS DISPATCH	WBNS	2	12	58	58	57	53
59	OHIO	DAYTON	DAYTON	41	DAYTON NEWS & JOURNAL HERALD	WHIO	2	7	64	63	63	58
60	OHIO	YOUNGSTOWN	YOUNGSTOWN	85	YOUNGSTOWN VINDICATOR	WFMJ	1	7	57	56	55	51
61	OKLA	OKLAHOMA CITY	OKLAHOMA CITY	39	OKLAHOMA CITY OKLAHOMAN & TIMES	WKY	1	15	48	48	47	46
62	OREG	PORTLAND	PORTLAND	25	PORTLAND OREGONIAN & OREGON JOURNAL	KOIN	2	19	54	55	54	48
63	PA	ERIE	ERIE	131	ERIE NEWS & TIMES	WSEE	0	6	53	53	52	48
64	PA	HARRISBURG	HARRISBURG-YORK-LANCASTER-LEBANON	45	HARRISBURG PATRIOT & NEWS	WTPA	1	7	63	63	62	59
65	PA	JOHNSTOWN	JOHNSTOWN-ALTOONA	71	JOHNSTOWN TRIBUNE-DEMOCRAT	WJAC	2	4	83	84	84	84

66	PA	LANCASTER	HARRISBURG-YORK-LANCASTER-LEBANON	45	LANCASTER INTELLIGENCER, JOURNAL, NEW ERA & NEWS	WGAL	2	5	79	80	79	80
67	SC	GREENVILLE	GREENVILLE-SPARTANBURG-ASHEVILLE	38	GREENVILLE NEWS PIEDMONT	WFBC	2	9	60	61	60	55
68	TENN	MEMPHIS	MEMPHIS	31	MEMPHIS COMMERCIAL APPEAL & PRESS SCIMITAR	WMC	2	15	56	55	54	49
69	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS TIMES-HERALD	KDFW	0	15	38	39	39	42
70	TEX	DALLAS	DALLAS-FT WORTH	11	DALLAS MORNING NEWS	WFAA	2	15	42	43	44	46
71	TEX	HOUSTON	HOUSTON	14	HOUSTON POST	KPRC	1	22	33	35	35	33
72	TEX	TEMPLE	TEMPLE-WACO	108	TEMPLE TELEGRAM	KCEN	1	2	90	92	92	95
73	TEX	TEXARKANA	SHREVEPORT-TEXARKANA	58	TEXARKANA GAZETTE & NEWS	KTAL	2	5	88	90	90	94
74	UTAH	OGDEN	SALT LAKE CITY	50	OGDEN STANDARD	KUTV	0	5	49	49	48	42
75	UTAH	SALT LAKE CITY	SALT LAKE CITY	50	SALT LAKE CITY DESERET NEWS	KSL	2	17	55	55	54	49
76	VA	NORFOLK-PORTSMOUTH	NORFOLK-HAMPTON-PORTSMOUTH-NEWPORT NEWS	46	NORFOLK VIRGINIAN PILOT & LEDGER STAR	WTAR	2	9	84	87	88	92
77	WASH	SPOKANE	SPOKANE	77	SPOKANE SPOKESMAN, REVIEW & CHRONICLE	KHQ	2	16	57	57	56	51
78	WVA	BLUEFIELD	BLUEFIELD-OAK HILL-BECKLEY	132	BLUEFIELD TELEGRAPH & SUNSET NEWS OBSERVER	WHIS	2	3	93	94	95	97
79	WISC	MILWAUKEE	MILWAUKEE	24	MILWAUKEE JOURNAL & SENTINEL	WTMJ	2	16	56	55	54	49
80	WISC	WAUSAU	WAUSAU-RHINE-LANDER	135	WAUSAU RECORD HERALD	WSAU	2	5	72	72	71	69

NOTES:

THE METHOD OF COMPUTING THESE INDICES IS DESCRIBED IN THE TEXT. WEIGHTINGS FOR NEWSPAPERS, TV STATIONS AND RADIO STATIONS ARE LISTED UNDER EACH APPROACH.

[a] KHBC HAS BEEN GRANTED A CONSTRUCTION PERMIT BUT WAS NOT ON THE AIR DURING 1973.

[b] CALCULATIONS BASED ON UNAUDITED CIRCULATION FIGURES FOR THE BLOOMINGTON-BEDFORD COURIER TRIBUNE.