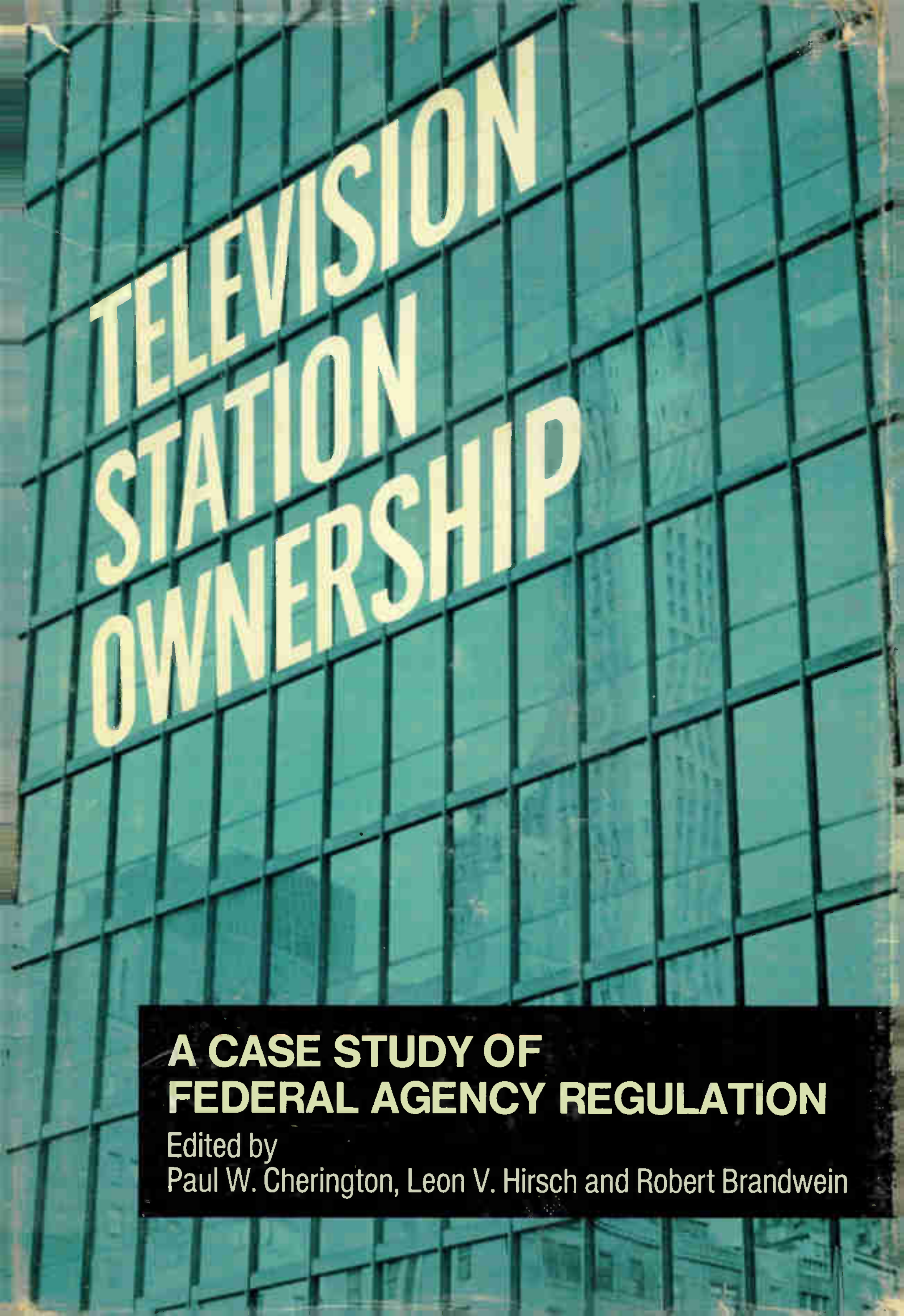

TELEVISION STATION OWNERSHIP

A CASE STUDY OF FEDERAL AGENCY REGULATION

Edited by
Paul W. Cherington, Leon V. Hirsch and Robert Brandwein

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In 1965 the Federal Communications Commission considered the "Notice of Proposed Rule Making" to limit the number of stations any one group could own in the nation's largest markets. The proposed rule was abandoned in 1968, but the problem of spectrum regulation has remained an important and hotly-debated issue.

To protest the 1965 rule, a group of forty-two firms which together owned over 100 television stations formed the Council for Television Development. The Council decided that an independent study would be of great value in understanding the implications of the proposed regulation. A management consulting firm, United Research Incorporated, was engaged to prepare a report to be transmitted to the FCC in its entirety.

This book is essentially that report. The editors were the key United Research staff members involved in the project. Dr. Cherington, James J. Hill Professor at the Harvard Graduate School of Business Administration, was Senior Consultant at United Research; Dr. Hirsch was Senior Vice President and General Manager of the Management and Economic Planning Division; and Robert Brandwein, Associate, served as Project Director.

The report examines the functioning of a key federal regulatory agency, the FCC, by focusing on its operations in the field of TV station licensing. Thus the report has relevance not only for those in the broadcast industry, but also for individuals in business, economics, political science, and law who are concerned with government regulation of business.

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Television Station Ownership

A Case Study of Federal Agency Regulation

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PAUL W. CHERINGTON

LEON V. HIRSCH

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Preface

THIS BOOK EVOLVED from a study which the editors conducted while associated with the management consulting firm of United Research Incorporated. The study was sponsored by the Council for Television Development, an *ad hoc* industry group comprised of 42 firms which together owned over 100 television stations. The Council, headed by Ward L. Quaal, President, WGN Continental Broadcasting Company, had been formed to prepare a response to the June 1965 "Notice of Proposed Rule Making" of the Federal Communications Commission, which sought to limit further the number of stations that any one group could own in the country's largest markets.

The Council retained Pierson, Ball & Dowd as its attorneys, with W. Theodore Pierson having prime responsibility, and established a research committee headed by Hathaway Watson, at that time President of RKO General Broadcasting. The Council then decided that an independent, unbiased study of the proposed regulation would be of key importance to a full understanding of its rationale and implications, and commissioned United Research to undertake the investigation. It was agreed that if the Council were to submit the resulting report to the FCC as an independent document, it would be transmitted in its entirety; i.e., the Council would not accept certain parts for presentation while rejecting others. Furthermore, United Research was given complete freedom to select staff members and outside consultants for the study; such individuals were chosen to reflect a broad range of political and regulatory opinion.

The editors of this book were the key United Research staff members involved in the project. In order of seniority, they were Dr. Paul W. Cherington, James J. Hill Professor at the Harvard Graduate School of Business Administration and Senior Consultant at United Research; Dr. Leon V.

Hirsch, Senior Vice President and General Manager of the Management and Economic Planning Division (the division which conducted the study); and Robert Brandwein, Associate, who served as Project Director. The editors were assisted by an able group of United Research professional staff members, including Barbara Madsen DeHart, Richard S. Fisher and William C. McClaskey.

In addition, United Research secured the services of a number of outside consultants for the original study: Dr. Paul W. Cook, then Associate Professor at the Harvard Business School; Dr. Edward M. Glick, Managing Director of the American Institute for Political Communication and Professor of Government and Politics, University of Maryland; Mr. Eugene H. King, now Director of Radio Communications, State University of New York; Mrs. Rose Kneznek, Consultant on Research Design and Statistics (Mrs. Kneznek was also of significant help in developing the book from the study); Mr. Herman W. Land, Broadcasting Industry Consultant; Dr. Harvey J. Levin, Augustus B. Weller Professor of Economics, Hofstra University; and Dr. Martin H. Seiden, President, M. H. Seiden & Associates.

It may be noted here that both Dr. Glick and Dr. Levin had previously espoused positions critical of industry practices. While serving as a consultant to the Senate Subcommittee on Juvenile Delinquency, Dr. Glick drafted the Subcommittee's report, *Television and Juvenile Delinquency* (October 1964). The report criticized the extent to which television made use of violence in its programming. Similarly, Dr. Levin sharply questioned the merits of newspaper ownership of broadcast media in *Broadcast Regulation and Joint Ownership of Media* (1960). Furthermore, Dr. Seiden had been a consultant to the Federal Communications Commission.

In the original report transmitted to the Commission in September 1966, each individual responsible for an area of analysis presented his own contribution, both orally and in writing. However, in order to develop this book around central themes and to eliminate some duplication, particular presentations have been consolidated as indicated in the table of contents. A chapter, the bulk of which is based on the contribution of a single author, is specifically credited to him. When a chapter has been developed from the contributions of more than one author the table of contents states that the chapter is "based on material developed by" the relevant authors. For this reason and because all consultant inputs (except for those of Mrs. Kneznek) were essentially complete by September 1966, the editors must take final responsibility for the structuring of the book and for the conclusions developed.

It is appropriate here to discuss briefly the trends in Commission regulation since it abandoned the proposed rule in February 1968. The Commission continues to rely on its powers to regulate station ownership as a vehicle for attempting to affect the operations of the industry in areas which are not susceptible to direct control. However, the Commission has not sought any further limitation on group ownership of television stations as such. Rather it has emphasized limiting media ownership by large corporate conglomerates and media concentration in *individual* markets by proposing to restrict an organization's ownership of more than one local communications medium. Yardsticks still present a difficult problem; Commissioner Nicholas Johnson in his book, *How to Talk Back to Your Television Set* (1970), states that determinations about acceptable levels of media concentration have to be made "largely on the basis of hunch," and accordingly calls for major research by an independent institution in this area.

Concern about the impact of television on public opinion has been expressed by an increasing number of public figures, representing a broader spectrum of political views than was the case several years ago. Almost all spokesmen believe, however, that government control is scarcely preferable to whatever powers the industry might possess; hence, the emphasis continues to be on indirect influence. Much basic research still needs to be done in this field, and it is encouraging that an international conference of television news executives and sociologists, sponsored by the International Broadcast Institute and held in Rome in March 1970, called for an extensive inquiry into the production of television news and the impact of its content on viewers.

The basic problem of radio spectrum limitation still underlies much of the rationale behind regulation, but the situation may change radically in the future. The FCC appears to have adopted the posture of actively encouraging cable television, even though this might hurt some existing television interests. While the future of cable television is still murky, it, and analogous technologies, could radically change the field of television by making possible a vastly increased number of channels, leading to the twin results of greater diversity and less potential for opinion molding.

The editors of this book maintain their interest in the area of communications and government regulation generally although no longer connected with United Research (which was recently absorbed in an acquisition). Dr. Paul W. Cherington has returned from Washington, where he served as Assistant Secretary for Policy and International Affairs, U. S. Department of Transportation, to resume his chair at the Harvard Business School and to assume the chairmanship of Temple, Barker & Sloane, Inc., a newly-organized consulting firm. Dr. Leon V. Hirsch is Venture Development Manager, Xerox Corporation, Stamford, Connecticut, where, as one aspect of his work, he is concerned with the potential of broadband cable communication for television and other purposes over the next decades (the wired nation concept). Mr. Robert Brandwein is Vice President of the international management consulting firm of Harbridge House Incorporated located in Boston.

We would like to thank all those who have made this study possible and to commend the industry for its statesmanship in giving us complete independence in preparing the original study and this book.

July 1970

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PART ONE

INTRODUCTION AND HISTORY

1

Introduction

CONGRESS DELEGATES authority to the independent federal regulatory agencies when it believes that it has neither the time nor the specialized skills to perform tasks that it judges necessary. For example, space restrictions in the radio spectrum are responsible for limitations on the number of television station licenses that can be issued. Rather than Congress itself judging among competing interests applying for licenses — a complicated, time-consuming job, open to a variety of external pressures — Congress has delegated its authority in this and in similar areas to the Federal Communications Commission.

An administrative agency should be guided by a limited number of clearly articulated basic policy objectives in order to maximize the prospect that it will function in a way that is effective, expeditious and reasonably predictable. These objectives may either form part of the original legislative mandate or may be formulated over time through clarifying legislation. On the other hand, as more frequently appears to be the case, the agency itself may have to develop its primary policy objectives because of the need for amplification of its legislative mandate. Building on these basic policy objectives, the agency should then develop a body of increasingly specific guidelines and criteria necessary to aid it in making particular decisions which, hopefully, would be reasonably rational, understandable, predictable and consistent.

This book focuses on the way one federal regulatory agency, the Federal Communications Commission, has operated in a component part of the general area of the licensing of television stations. More specifically, the book examines the particular rules adopted by the Commission limiting the number of stations any one licensee may control. FCC rules specify that no one interest may own more than one television station in a particular area — the "duopoly rule." However, a single interest may control both television as well as AM and FM radio stations in an area. Furthermore, no one interest may control more than seven television stations throughout the country, only five of which may operate in the VHF, as opposed to the UHF, spectrum. (Channels 2 through 13 comprise the VHF spectrum and 14 through 83, UHF.) At the end of 1964, the FCC issued an "Interim Policy," followed in mid-1965 by a "Notice of Proposed Rule Making," which — while not requiring divestiture — would limit future licensing of stations in the top 50 markets to interests that would then own no more than three stations — no more than two in the VHF band — in these markets.

A brief review of the structure of the television industry can help put these limitations on ownership into perspective. The three national networks (ABC, CBS and NBC) produce and distribute programming and advertising to a nationwide grouping of stations. Each network actually owns and operates only five stations; the other stations that carry its programs are independently-owned affiliates of the networks. Network affiliations are contracts of fixed duration and are usually, but not always, renewed. It is generally to the advantage of the stations not owned by the networks to obtain a network affiliation because the networks supply program material and advertising revenue, resulting in audience attraction and, hopefully, enhanced profits. All stations, whether affiliated or not, also purchase programming from independent outside sources and some produce their own programming. In a market consisting of less than three stations, a station may be affiliated with more than one network. In markets with three stations, in almost all cases, each station is affiliated with a single network; and in markets with four or more stations, at least one station must be an independent, i.e., not affiliated with a network.

Nonnetwork-owned stations, whether affiliated with a network or not, may be owned by an interest controlling only one television station (a single-station owner) or by a "group" (or "multiple owner") — one who controls more than one station. A single-station owner may or may not have an affiliation with a network. The stations of a group owner may all be affiliated with one network (rare) or with different networks, or some may be affiliated with networks and some may be nonaffiliated independents.

This book will examine one aspect of FCC restrictions on television station control: that of limiting ownership to seven noncompeting television stations — and, further, possibly to three in the top 50 markets. The duopoly rule is almost universally accepted by government, the industry and the academic community, and as such will not be evaluated in the book. Also, FCC limitations on multiple ownership will be reviewed only in relation to nonnetwork owners; the ownership of stations by networks involves a number of different considerations which will not be covered in this book.

It appears that the FCC, in formulating its limitations on multiple ownership, has often elevated guidelines and specific criteria — devised for disposition of adjudicatory application proceedings, such as comparative hearings for the same facility — to the status of policy objectives. It also seems that the FCC, even when it may have recognized the derivative nature of guidelines and specific criteria, either did not clearly trace these derivative elements from what should have been its basic policy objectives — or imperfectly traced them on *a priori* grounds rather than on analytical and statistical grounds. Not only is the latter approach essential, but there must be continued testing and reevaluation of the links between basic policy objectives and second- and third-order guidelines and criteria.

In examining the functioning of the FCC in terms of the above comments, we should be aware that the Commission has an extremely difficult and complex job. Rapid technological and institutional change is characteristic of the communications industry. Further, as a result of its special position in the field of public opinion, the Commission is subject to political and other *ex parte* pressure. In addition, its crowded docket and its overburdened staff no doubt prevent the Commission from standing back and taking a broad overview of its work. The benefit of hindsight makes for more facile criticism of the Commission's apparent lack of policy planning. Recognition of these mitigating circumstances does not mean, however, that ways in which the FCC could improve its effectiveness should not be examined. In order to determine how the Commission might function more effectively and expeditiously, it is important first to examine the doctrines guiding its operations.

The "public interest, convenience or necessity," as supplied in the Communications Act of 1934, is the basic legislative mandate of the FCC. Although from time to time — in a limited number of specific areas — Congress has given legislative direction to the Commission, the "public interest, convenience or necessity" mandate is still primary. It can be stated, with some justification, that in the case of the FCC these words have essentially been drained of meaning. The question is not whether a broadcasting service is needed but rather who should render it.[1]

Because of the vagueness of the legislative mandate, it is all the more incumbent on the Commission to formulate clear primary policy objectives. While this goal does not appear to have been completely and satisfactorily accomplished, it is possible to examine the multitude of doctrines and statements enunciated regarding the Commission's work and from them derive three general policy objectives, one positive and two negative. In other words, in attempting to achieve the positive goal, two undesirable objectives should be avoided. These three basic policy objectives are that the

[1]Henry J. Friendly, *The Federal Administrative Agencies*, Harvard University Press, Cambridge, Massachusetts, 1962, p. 55.

public should have programming which best serves its needs and interests (positive) while avoiding the exercise of undue economic power (negative) and undue control or influence over thought or opinion in the local, regional and national forum (negative). "Undue economic power" should be measured not only *vis a vis* competing stations but also against other links in the broadcasting chain, such as networks, station representatives and program suppliers.

An example of a comparative hearing guideline derived from basic policy objectives is that of "community identification." An owner identified with and having knowledge of the community served is believed to give the greatest assurance of having a grass roots interest in the program and service needs of the community. Furthermore, such an owner is said to give better indication of serving as a forum or mouthpiece for the community and of giving civic, social and business groups appropriate access to the facility.

Another comparative hearing guideline is that of diversity of program service and viewpoints which is tied to all three basic policy objectives. Diversity of the interests represented in broadcasting can, it is held, help prevent the exercise of undue economic power or undue control or influence over thought or opinion. Diversity of program services to a community can help widen the range of viewing choices open to it, especially in relation to its minority audiences.

From these guidelines of community identification and diversity has developed the criterion of local ownership. Local ownership (and management) is one evidentiary item said to give an indication of community involvement and interest and to encourage diversity. In addition, it is felt that a local owner would be more likely to carry out the programming promises made when applying for licensing. It should be recognized that the criterion of local ownership is not and should not be considered an independent policy objective. It has value only insofar as the links tieing it to the policy objectives are sound and no alternative criteria or combination promise equally good results. We should recognize, as does the Commission, that other — possibly contradictory — criteria give evidence of providing the public with programming which best serves its needs and interests; these criteria include financial resources, experience and satisfactory prior experience.

The FCC, in addition to setting forth general criteria, has also established the previously-mentioned specific limitations on multiple ownership. That the FCC has the right to establish specific limitations is not in question and, in fact, has been upheld by the Supreme Court.[2] There is no denying that any specific limitation is arbitrary, but the advantage of establishing a

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[2]*United States* vs. *Storer Broadcasting Co.,* 53 U.S. 192.

definite, predictable and easily understood limitation has value. Opponents of the specific limitations which have been established should attempt to propose alternatives against which the present rules can be evaluated. This does not mean that one should not examine the correctness of the relationship between these links and the basic policy objectives of the FCC. If the limitations have been inadequately derived from weak premises, or by not using whatever statistical and other tools are available, then the limitations are subject to question and modification. Certainly, there would be no further reason to limit multiple ownership with the "top fifty" rule if the seven station rule is overly restrictive.

The goal of this book is to examine nonnetwork multiple ownership from the point of view of the three basic policy objectives set forth above. After looking more closely at the historical background of the multiple ownership rules, the book will look at each policy objective in turn.

Part II examines the relationship of economic considerations to nonnetwork multiple ownership. It covers: market structure; competition and form of ownership; mergers and acquisitions; and station transfers.

Part III examines the relationship of the influence of television in general — and nonnetwork multiple ownership in particular — to thought and opinion control.

Part IV looks at multiple ownership in its ability to serve the community needs and interests. This is the most difficult area to evaluate. Program "quality" should not be assessed directly — even if, in fact, what constitutes "quality" could be agreed upon — because of the possibility that such judgments could lead to infringements on freedom of speech. This section does, however, look at those factors which presumably hold out the hope for the better meeting of community needs and interests, such as station identification with and knowledge of a community, and the encouragement of a wide range of broadcasting outlets — which, among other factors, would result from the adequate utilization of the UHF band.

The book concludes with a summary evaluation of the FCC rules limiting multiple ownership in relation to the three basic policy objectives and makes suggestions for future action.

2

The Multiple Ownership Concept Prior to 1958

An historical review shows that the earliest justification for limiting ownership of broadcasting stations was to avoid monopolization. After the widespread influence of broadcasting was recognized, concern was expressed that there might be undue control over public opinion. Later, the position was presented that local identification through local ownership was a positive benefit and should be sought by discouraging multiple ownership. This chapter reviews the development of these concepts as related to multiple ownership up to 1958, the time of the issuance of a major report on the broadcasting industry by a study group headed by Roscoe L. Barrow, Dean of the University of Cincinnati Law School.

Since the early- and mid-1920's, which marked the beginning years of radio broadcasting, there had been concern over the possibility that radio communication might be monopolized. In 1923, legislation was introduced in Congress which would have conferred judicial functions upon the broadcast licensing authority (which then formed part of the Department of Commerce) to determine whether in its judgment there was such a tendency toward monopoly.[1] This concern of Congress arose from fear of the dominant role of a few manufacturing companies (such as RCA, AT&T and General Electric) in the international wireless and other communications industries. In 1925, the Fourth National Radio Conference recommended legislation incorporating the principle that no monopoly should be permitted in radio. Congressman White of Maine, who was then a leader in the field of radio legislation and the author of the original House bill, felt that the bill struck the necessary balance between preventing undue eco-

[1] H.R. 737, 68th Congress, 1st Session, 1924; H.R. 13, 773, 67th Congress, 4th Session, 1923.

nomic control and overly restricting the industry. He stated that ". . . in the antimonopoly provisions of general law and of this bill (H.R. 9971), we have gone to the extent public safety requires. We believe that to go further would be both unjust and unwise. Laws, narrow, restrictive and destructive of the new industry, serve no public good. We should avoid them."[2]

Section 12 of this bill, which became the Radio Act of 1927, required Commission consent to the transfer or assignment of licenses. Although it did not refer to monopoly as such and was aimed primarily at the prevention of alien ownership beyond the limits prescribed by the statute, one of the objectives of Section 12 was the avoidance of the concentration of broadcast facilities in the hands of a small number of owners. The Court of Appeals for the District of Columbia stated that Congress has stressed the importance of Section 12 "as a means of preventing the barter and sales of licenses whereby a single interest might without restraint acquire many stations by purchase or otherwise."[3]

The Communications Act of 1934 creating the Federal Communications Commission superseded the Radio Act of 1927 and adopted many of its provisions. The governing standard for becoming, or remaining, a broadcasting licensee under the 1934 Act was the "public interest, convenience or necessity," subject only to such express statutory limitations as American citizenship and adequate financial ability.[4] In Section 313 of the Act, Congress declared that "All laws of the United States related to unlawful restraints and monopolies and to combinations, contracts or agreements in restraint of trade" are applicable "to interstate and foreign radio communications" which, of course, encompassed broadcasting. If the licensee of any broadcasting station were to be found guilty of a violation of such laws, the court might revoke its license. The Commission was placed under a statutory mandate to refuse a construction permit and/or a license to any person whose license had been revoked by a court for violation of the antitrust laws.

A provision similar to Section 7 of the Clayton Act is contained in Section 314 of the Communications Act of 1934, as amended. This latter section prohibits communications common carriers — that is, any person or firm engaged directly or indirectly in the business of transmitting and/or receiving for hire interstate or foreign messages by any cable, wire, telegraph or telephone line or system — from acquiring or operating or owning any stock in any station or the apparatus therein, or any system for transmitting and/or receiving interstate or foreign radio communications or signals where the effect may be to substantially lessen competition or to restrain commerce or to create a monopoly in any line of commerce.

[2]67 *Congressional Record*, p. 5480 (1926).
[3]*Pote* v. *F.R.C.*, 67 F. 2d 509, cert. denied, 290 U.S. 680 (1933).
[4]Sections 307-310 of the Act.

The Communications Act of 1934 and the establishment of the Federal Communications Commission did not see the end of concern with possible monopolization of broadcasting. In the years following, numerous bills, resolutions and reports were introduced or submitted to Congress to investigate and prevent monopolization of the broadcast industry. In 1936, H.R. Res. 394 was aimed at having a select committee appointed to investigate charges of alleged monopolies in the broadcasting industry.[5] Again, in 1937, H.R. Res. 92 sought authorization for the Speaker of the House to appoint a committee of seven Representatives to investigate the allegations and charges that a monopoly or monopolies existed in radio broadcasting.[6]

One of the earliest expressions of concern about the possibility of undue influence over thought and opinion occurred in 1937 when Congressman McFarland charged in the House of Representatives that there was an absolute monopoly in the molding of public opinion through undisputed control of radio stations, newspapers and motion pictures. Congressman McFarland was also one of the first to be concerned about undue profits resulting from "fraudulent" practices in the "trafficking" in radio licenses.[7] This concern was echoed by other Congressional objections to the Commission's practice of giving its approval to the transfer of stations for amounts in excess of the value of the physical assets of the stations. For example, Congressman Wigglesworth alleged in 1942 that the Commission had thereby allowed the creation and extension of monopolies.[8]

During this same period (1935-1940), the FCC became increasingly concerned with concentration of control and ownership in broadcasting. A clearly discernible FCC policy against the common ownership or control of more than one AM station in the same community emerged from several adjudicatory actions upon applications for new or increased standard (AM) broadcast facilities.

By 1938, the FCC clearly enunciated the position that fear of concentration of control in a particular community was an important factor in denying grants. In *WSMB, Incorporated*,[9] the Commission stated:

> The available frequencies in the broadcast band are limited, and the Commission is loathe to grant facilities for an additional broadcast station to one who already holds a license for a station in the same community unless it is clearly shown that the public convenience, interest, or necessity would be served thereby. Other things being equal, it would appear that if there were a need for an additional local broadcast station in a community

[5] 80 *Congressional Record*, p. 417.
[6] H.R. 2678, 83 *Congressional Record*, pp. 8756, 8838 and 9313-25.
[7] 81 *Congressional Record*, pp. 7280-82.
[8] 88 *Congressional Record*, p. 551.
[9] 5 FCC, p. 58.

> and if there were a frequency available for this service, the facilities should be granted to someone who does not already hold a broadcast license for an unlimited time station in that community.

This reasoning was reaffirmed two months later in the *Genessee Radio Corporation* case.[10]

The FCC gradually expanded the situations in which it would find concentration of control in an individual market — beyond the fact of common legal ownership in the same community — to encompass family relationships as well as interlocking directors and officers between stations in the same community[11] and common ownership between stations in different communities but with overlapping service areas.[12]

Action by the FCC to examine the question of concentration of control and ownership was initiated by the promulgation on March 18, 1937, of Order No. 37 issued pursuant to Section 303(i) of the Communications Act authorizing the Commission to investigate chain broadcasting by the networks and their affiliates.[13] This Order included as an issue the "extent and effect of concentration of stations locally, regionally or nationally . . . by means of (*inter alia*) common ownership . . ." Although the hearings under Order No. 37 did not result in specific recommendations on multiple ownership, the committee which supervised the investigation presented 21 pages of statistics purporting to establish a citywide, statewide and nationwide nonnetwork concentration of control reaching serious proportions. According to the committee, at the end of 1939, 41 commercial broadcast station owners (out of a total of 464 owners) controlled two or more stations each located in the same city and received 33% of the revenue of all stations.[14] The committee reached the conclusion that multiple ownership posed a threat not only of undue economic power, but also of undue control over opinion.

> The problem with respect to the ownership of two or more stations by the same person or group of persons is not unlike that of network ownership of stations. The record evidences a definite trend toward concentration of ownership of radio stations. The 660 commercial stations in 1938 were owned by a total of

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[10] Ibid., pp. 183 and 186.

[11] E.g., *The Colonial Network, Inc.* 5 FCC, p. 654; and *L. L. Coryell, Sr.*, 6 FCC, p. 282.

[12] E.g., *Roberts-MacNab Co.*, 6 FCC, pp. 548 and 553; and *The Citizens Broadcasting Corp.*, 6 FCC, pp. 669 and 676.

[13] Chain broadcasting is defined in Section 3(p) of the Communications Act as "the simultaneous broadcasting of an identical program by two or more connected stations."

[14] FCC, *Report on Chain Broadcasting* (Docket No. 5060), Part V and p. 118.

> 460 persons, both natural and corporate. Eighty-seven of these persons owned more than one station each and received in 1939 approximately 52 per cent of the total business of all commercial broadcasting stations. To the extent that the ownership and control of radio broadcast stations fall into fewer and fewer hands, whether they be network organizations or other private interests, the free dissemination of ideas and information, upon which our democracy depends, is threatened.[15]

Almost simultaneously with the issuance of the committee's report, the FCC adopted its first multiple ownership rule prohibiting common ownership of FM stations "in substantially the same service areas" and limiting common ownership to six FM stations.[16] In 1941, a similar regulation pertaining to commercial television was adopted with the only substantive difference being a three-station limitation instead of the six established for FM.[17] The rule for television stations stated:

> §4.226 *Multiple Ownership* — No person (including all under common control) shall, directly or indirectly, own, operate or control more than one television broadcast station, except upon a showing (1) that such ownership, operation or control would foster competition among television broadcast stations or provide a television broadcast service distinct and separate from existing services, and (2) that such ownership, operation or control would not result in the concentration of control . . .

The Commission at first proposed to extend the FM and TV duopoly rule to AM without placing a numerical limitation on the total number of AM stations under common ownership.[18] In 1943, a rule was adopted so as to prohibit ownership of more than one station where there is an overlap of a "substantial portion of the primary service area" of either station "except upon a showing that public interest, convenience and necessity will be served through such multiple ownership situation."[19] In 1946, CBS was refused permission to acquire an interest in more than seven AM stations even though no limit had been set for AM.[20]

In 1947, a bill[21] was introduced proposing that the coverage area of stations owned by any group be limited to 25 percent of the total United States population. In 1948, after the failure of this bill, the Commis-

[15]Ibid., Part VI and pp. 133-34.
[16]*Federal Register*, Vol. 5, p. 2382 (1940).
[17]*Federal Register*, Vol. 6, p. 2282 (1941).
[18]FCC, *Order No. 84* (August 5, 1941).
[19]FCC, *Order No. 84-A* (November 23, 1943).
[20]Sherwood B. Brunton, 11 FCC, p. 406 (July 31, 1946).
[21]80th Congress, 1st Session (S.1333).

sion issued a notice of proposed rule making[22] providing a numerical limitation for AM stations for the first time, and proposing a "sliding scale" to be utilized in determining the maximum limitation on AM, FM and TV ownership. This proposal, which equated two minority noncontrolling holdings with one full or controlling ownership, was rejected in the Commission's 1953 Report and Order[23] on the grounds that "to permit parties to acquire interests of any nature in more than the specified number of stations... would tend to defeat the diversification policy."[24] The Commission did, however, adopt a seven-station limitation for AM and raised the FM limitation to seven (maintaining the limitations for TV at five.)[25]

In accepting such a numerical limitation approach rather than some other formula, the Commission stated:

> In view of the arguments advanced by some parties that the proposed rules are arbitrary in that they give no effect to class and size of stations, geographical locations, populations served, and similar factors, we have considered alternatives to the outstanding proposal. But as a result of a study of the present holdings of multiple owners, we have concluded that any proposal to limit multiple ownership on the basis of such factors as class of station or geographical location, is either unsatisfactory or unworkable. For a formula, which we believe would reasonably limit ownership on such bases, would require extensive divestment of holdings by existing licensees: it is felt that this would be unduly disruptive.
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> * * *
>
> ...As to devising a reasonable formula and 'grandfathering' present holdings however greatly in excess of this new criterion, this is believed improper in view of the extensive multiple AM holdings and the nature of such holdings built up over that service's long history and the consequent unfairly preferential treatment accorded such multiple owners.[26]

In 1954, the Commission felt constrained to liberalize the multiple ownership rule to encourage the development of the UHF band, since it felt that its earlier program to expand UHF telecasting and to fully integrate the UHF band with the VHF band ("intermixture") had been almost a total failure. In its efforts to increase the number of UHF stations, the Commission stated that it would consider applications for new UHF stations even though the applicant did not propose any local program origina-

[22]*Federal Register,* Vol. 13, p. 5060.
[23]*Federal Register,* Vol. 18, p. 7796.
[24]Ibid., p. 7798.
[25]Ibid., p. 7799.
[26]Ibid., p. 7797.

tion, and raised the five-station TV limit to seven provided at least two were in the UHF band.

> Our decision to permit the ownership of television stations over and above the five-station limitation presently in the rules in no way is a departure from the recent multiple ownership Report and Order in Docket No. 8967. In that Report and Order the Commission reaffirmed its view that the operation of broadcast stations by a large group of diversified licensees will better serve the public interest than the operation of broadcast stations by a small and limited group of licensees. Thus, the Commission has provided that a grant of even one additional broadcast station will not be made where it 'would result in a concentration of control . . . of broadcasting in a manner inconsistent with the public interest, convenience and necessity.' Clearly if the only relevant consideration were implementation of the policy of diversification, an absolute limitation of one broadcast station to any one person or persons under common control would best serve the public interest. But, of course, that is not the case. The multiple ownership of broadcast stations does play an important role in our nationwide broadcast system. The ownership of broadcast stations in major markets by the networks, for example, is an important element of network broadcasting. Our nationwide system of broadcasting as we know it today requires that some multiple ownership of broadcast stations be permitted. We have always recognized these needs and have by rule permitted multiple ownership of broadcast stations in the light of such (other and competing) considerations. Here too it is our view that the greater good which will flow from the proposed rule offsets the disadvantage resulting from permitting individual licensees to own a larger number of stations.[27]

This position of the FCC is important historically as an indication of the attempt of the Commission to balance two basic policy objectives, that of encouraging diversity — or at least quantity of broadcast services — so as better to serve the public, with the desire to avoid undue economic power or influence over thought or opinion.

While the FCC was liberalizing its limitations on multiple ownership, a memorandum was prepared for the Senate Committee on Interstate and Foreign Commerce urging increased restriction. This memorandum, prepared in early 1955 by Harry M. Plotkin, employed by the Committee as special counsel in connection with its UHF and network study, stated that because of the economic power of group stations *vis a vis* single stations,

[27]*Federal Register,* Vol. 19, p. 6102.

groups were consistently more successful in obtaining attractive network affiliations. On the basis of this he recommended decreasing the maximum number of stations allowable to any one owner.

> The Commission's rules impose the same limitation on nonnetwork multiple owners as in the case of networks — 5 VHF and 2 UHF stations. The ownership of a large number of stations by a single group has many restrictive effects. Single stations find themselves at a substantial disadvantage in competing with the multiple owner of a group of stations possessing superior economic power. In competing for network affiliations, this disadvantage is most marked. The multiple owner tends to affiliate with the same network in each market. Thus there is one group of stations owned by the same organization that is able consistently to secure CBS affiliations. Another multiple owner is able to secure NBC affiliations. It is apparent that the superior bargaining position which such multiple owners possess makes competition by a single station owner for an NBC or CBS affiliation a pretty meaningless game. The multiple ownership of stations by these groups does not even have the justification found in the case of the networks owning more than one station. In the latter case such ownership is valuable as training ground for the development and presentation of programs which are then made available to affiliated stations throughout the country. No such comparable service is performed by other multiple owners. Serious consideration should be given by the Commission to a reexamination of its policy with respect to ownership of stations so as to determine whether 3 television stations are the maximum which any 1 group should be permitted to own. In addition, a careful study should be undertaken as to whether multiple owners have abused the power inherent in the ownership of multiple stations by securing desirable affiliations by methods which constitute violations of the antitrust laws.[28]

The establishment of specific limitations on station ownerships by the FCC was challenged and upheld by the Supreme Court in 1956 in *United States* v. *Storer Broadcasting Co.*[29] In that case, Storer, a multiple owner, attacked the Commission's Order of November 25, 1953, amending the multiple ownership rules. On May 21, 1956, the Supreme Court upheld the rules on the ground that they were flexible enough to allow for waivers or amendments on showing of adequate reasons therefor and, hence, were properly within the rule-making power of the Commission even though not

[28]Memorandum prepared for the Senate Committee on Interstate and Foreign Commerce by Harry M. Plotkin, 1955, pp. 39-40.

[29]353 U.S. 192.

specifically authorized by statute. In other words, the Court took the position that since the Commission had general rule-making power not inconsistent with the Act or law and since the multiple ownership rules were properly incorporated by the "public interest" criterion, they were valid so long as provision existed for flexibility in the administration of the rules.

At about this same time there was another attempt to base multiple ownership restrictions, not on number of stations, but on population. In 1956, Senator John W. Bricker of Ohio submitted a report on the "Network Monopoly" in which he stated that the Congress or the FCC should "eliminate the Commission-dictated numerical limit upon stations which may be owned or controlled by one person and substitute therefor a more realistic population criteria."

This increasing concern with competition in the broadcasting industry culminated in a major report on the industry, undertaken in mid-1955 for the FCC by a staff headed by Roscoe L. Barrow. The contents of this report, *Network Broadcasting, Report of the Network Study Committee of the Federal Communications Commission to the House Commerce Committee* (hereinafter called the Barrow Report), will, insofar as they pertain to nonnetwork multiple ownership, be discussed in the following chapter.

During the time the Barrow Report was being prepared, concern over the multiple ownership question was manifested in Congress and in the FCC. On July 23, 1956, Senator Magnuson transmitted to the FCC a report in which he emphasized his concern that stations be local institutions.

> ...Radio and television stations should be owned and operated by people who know the communities where they are located, who have a very real and close feeling for them, and who have a strong, primary concern for the interests of their communities. Conversely, such stations should not be licensed simply to the man who has the most money to build or buy them; instead, as already suggested, licenses should be granted to those most likely to provide outlets for the genuine local self-expression which is so essential to our democracy.... The Commission should be on guard against the intrusion of big business and absentee ownership—such as film producers, aviation carriers, magazine publishers, insurance companies, or other large investors interested in the tax advantages offered by the broadcast industry—to dominate the field of station ownership. Instead, the Commission should seek to encourage local, integrated ownership and operation by people interested in long-range service to their communities as a part of those communities.[30]

[30]Senate Report No. 2769, Interim Report of the Senate Commerce Committee on "The Television Industry — Allocation Phase," pp. III-IV.

In March 1957, the Antitrust Subcommittee of the House of Representatives submitted a report on "The Television Broadcasting Industry" in which multiple ownership was felt to lead to undue economic power. The report stated:

> ... the multiple ownership of stations has had a recognized anti-competitive influence in the broadcasting field, which may lend itself to the abuses of concentration and tie-ins, and may produce incalculable competitive advantages for multiple owners and a degree of conflict of interest on the part of the networks....
>
> The Committee concludes that the Commission should give these antitrust and other factors emphatic consideration in any change in the multiple-ownership rules.[31]

The Barrow Report — sometimes called the Bible of television regulation — reflected this increasing concern with potential abuses in the industry.

[31] House Report No. 607, Vol. 2, p. 39.

3

The Barrow Report and Its Influence on the Multiple Ownership Question

ON JULY 20, 1955, pursuant to authority granted by Congress,[1] the Federal Communications Commission appointed a committee of four Commissioners to study the practices of radio and television networks and their relationship to the public interest. In its Statement of Purposes and Objectives, the committee noted that its basic concern would be with the broad question of whether the existing network structure and relationships tended to foster or to impede competition in the broadcasting industry. In attempting to resolve this question, the committee believed it necessary to examine a number of subsidiary areas including that of the past and future effects on radio and television broadcasting of "The ownership of more than 1 radio or television broadcast license by any 1 person."[2] The committee appointed Roscoe L. Barrow to head a staff composed of an executive secretary, four economists, two attorneys, a statistical analyst, an investigator, an industry liaison man and two advertising consultants. On October 10, 1957, after two years of effort and an expenditure of $221,000, the FCC transmitted to Congress the report entitled *Network Broadcasting, Report of the Network Study Committee of the Federal Communications Commission to the House Commerce Committee.*

Insofar as it addressed itself to the multiple ownership question, the Barrow Report was designed to examine three aspects of the issue:

> . . . (a) whether the concentration of control in station ownership is consistent with the public interest; (b) whether competition

[1]P.L. 112, 84th Congress, 1st Session.

[2]FCC 55M-977, November 22, 1955, reprinted as Exhibit 2(b) in *Network Broadcasting, Report of the Network Study Committee of the Federal Communications Commission to the House Commerce Committee*, 1958, p. 672.

> among stations is affected by the differences between multiple-station owners and single-station owners in their bargaining relationship with networks, station representatives and program producers; and (c) whether competition between networks and non-network groups is affected by the ownership and operation of stations by networks.[3]

Since this book is concerned only with the issue of nonnetwork multiple ownership, the focus here is on the first two areas noted above.

The Barrow Report summarized its position on multiple ownership by reference to three "Commission doctrines."

1. ". . . broadcasting stations should be locally owned."
2. ". . . ownership of stations should be diversified in order that the variety of opinion, program, and service viewpoints may be maximized."
3. ". . . monopoly or concentration of economic power contrary to the public interest [should be prevented]."[4]

Barrow believes that: "Carried to their logical conclusion, these doctrines would result in a one-to-a-customer limit on station ownership." That such has not been Commission practice Barrow ascribes to the Commission's balancing these doctrines with "favoring an applicant having a sound record of past performance. . . ."

The concern here is not whether the Barrow Report has accurately reflected the FCC position, but rather in examining the factual and analytical support for these positions. Unfortunately, except for the economic area, the Report does not attempt to evaluate these "doctrines." In the economic area, Barrow does make assertions as to the nature of economic power which he says accrues to group owners, but does not back up these assertions factually.

In his first doctrine, "local ownership," a specific criterion is elevated to the status of a policy objective. Local ownership is linked to the guideline of stations achieving "the character of local institutions having a grassroots interest in the service and program needs of the community."[5] The virtue of local ownership is said to lead to "familiarity with local social and economic conditions, the peculiar needs of local, civic, social, and business groups, and the various available participants and entertainment talent in the community,"[6] and to provide "the opportunity for the local public to receive programing suited to its desires and needs and the opportunity for

[3]Op. cit., p. 553.
[4]Op. cit., p. 650.
[5]Ibid.
[6]Op. cit., p. 125.

local participants to have access to the local facility."[7] Barrow, however, does not show why local ownership is the only — or even the prime — way of achieving these goals or how this grass roots interest would necessarily lead to the ability to give the public the programming which best serves its needs and interests. Barrow's failure to even attempt explicitly to link the guideline of local ownership to the basic policy doctrine of service to the public is an untoward omission since elsewhere in the report he recognizes the primary nature of the basic policy objective of service to the public.

> Recurring references by the courts and the Commission to the idea of service to the public as the primary objective of the regulatory scheme have tended to solidify this objective as the predominant ingredient of the public interest standard. Such important regulatory themes as competition, diversification of broadcast station ownership, and broadcast licensee responsibility, while of major concern, should be considered, nevertheless, as secondary policies, which implement the basic service to the public goal of the public interest standard.[8]
>
> * * *
>
> Service to the public is the ultimate goal of the broadcast regulatory function. This policy is ordinarily phrased in terms of making available a broadcast service filling the needs and desires of the community served by each broadcast facility[9]
>
> * * *
>
> . . . the ultimate criterion of operation in the public interest is the rendering of the best practicable service to the community reached by the broadcast. Service means programing . . . programing which best fits the needs and desires of the community served.[10]

In evaluating programming, the Commission should avoid attempting to measure "program quality" and taking other similar actions which could smack of censorship. The Communications Act "cautions the Commission against exercising a power of censorship over broadcast communications although this proscription is qualified somewhat by the necessity for evaluating program practices or proposals in licensing contexts wherein the level of performance must meet at least minimum public-interest standards."[11]

The second of Barrow's doctrines contains two aspects. The first states that "ownership of stations should be diversified in order that the variety of opinion, program and service viewpoints may be maximized," and that this

[7]Ibid.
[8]Op. cit., p. 56.
[9]Op. cit., p. 635.
[10]Op. cit., p. 155.
[11]Op. cit., p. 156.

doctrine carried to its logical conclusion "... would result in one-to-a-customer limit on station ownership."[12] However, it can be argued whether the extreme position of one-to-a-customer is the only or best way of avoiding undue influence. The second aspect holds that ownership should be diversified in order to maximize the variety of program and service viewpoints presented. Barrow also holds that "the maximum diversity of ownership creates the greatest potentiality for promoting ... innovation in program fare."[13] Here, too, Barrow presents no evidence that a one-to-a-customer limit on station ownership best achieves maximization of program innovation and variety. While it might appear that some degree of diversification leads to better service to the public, single stations may not have the resources, experience or risk preference to encourage such diversity. It may just as reasonably be argued *a priori* that appropriate diversification can best be achieved, for example, by a balance between single owners, multiple owners and networks, or by a balance between local, group, network and independently-produced programs.

The third doctrine is that of the prevention "of monopoly or concentration of economic power contrary to the public interest." Here the report alleges that:

> Multiple-station owners, by bargaining with networks, national spot representatives, and independent program suppliers for their group of stations as a whole, have been able to obtain more favorable terms which give them a competitive advantage over single station owners in the same communities. This is the principal manner in which multiple ownership has had an impact on competition in the market place.[14]

More specifically, the report states:

> ... In bargaining with networks, the multiple owner is in a position to seek network affiliation for all his stations, to have stations placed on the "must buy" list [basic stations which an advertiser must order as a condition of using network facilities] and to establish the rates for his stations and the division of compensation between the network arrangements. In bargaining with national station representatives, the multiple owner is in a position to seek, on the basis of representation of a desired group of stations, lower rates for the representation service. Similarly, in bargaining with film suppliers, group station purchases give a basis for seeking a favorable pricing arrangement.[15]

[12] Op. cit., p. 650.
[13] Op. cit., p. 109.
[14] Op. cit., p. 564.
[15] Op. cit., p. 565. (Material in brackets added by authors.)

The Barrow Report states that "... it has been found in the study that the larger multiple owners each have one or more advantages arising from their multiple holdings."[16] However, the report gives no evidence to support the allegation that multiple owners have taken undue advantage of these assumed economic powers.

On the basis of the above three doctrines, the Barrow Report comes out strongly against multiple ownership and recommends a presumption in favor of local applicants with no previous interests in television in awarding original station grants. Furthermore, it states:

> In the long run, the Commission should seek through its regulation a pattern of ownership which approaches as closely as circumstances permit the objective of limiting station ownership to one station for each licensee.[17]

The report recommended "that the multiple-ownership rules be amended to provide that no licensee be permitted to own more than 3 VHF stations in the top 25 markets of the United States."[18] It should be noted that divestiture would be required under this recommendation. Other major recommendations included new station transfer procedures to limit "excessive trafficking" in television station licenses.

There is some evidence that the Barrow Report's position on multiple ownership has affected FCC actions by influencing the nature of decisions made under comparative proceedings on grants for new television stations and possibly by encouraging the issuance of the "Interim Policy" and related "Notice of Proposed Rule Making" to limit future television station ownership in the top 50 markets to three outlets.

As discussed earlier, the Commission considers various criteria in judging between the several petitions for operation of a new television channel. The criteria considered are: local residence, civic participation, diversification of occupations of principals, experience, integration of ownership with management, past broadcasting records, planning and preparation, program policies, program proposals, studios and equipment, staff and, finally, diversification of media of mass communications. There have been no specific weights attached to each of these criteria, and the Commission has appeared to vary the consideration given the factors from case to case. A number of decisions have been based on a close vote of the Commission.

Because weights are not explicitly specified for these factors, it is only possible to infer a policy change by looking at the record. In only one of the twelve comparative hearings during the post-Barrow period, 1958-

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[16]Ibid.
[17]Op. cit., p. 659.
[18]Op. cit., p. 660.

1964, did the Commission specifically rule against an applicant because of group ownership. In *Grand Broadcasting Company, et al.,*[19] a group owner, the Peninsular Broadcasting Company, competed against three applicants, none of whom had any prior TV interests. The Commission ruled that "the extensive broadcast interests of H&E Balaban Corp. [Peninsular Broadcasting Co.] militates against a grant to Peninsular, . . ."[20]

However, the possibly greater weight given to single as against multiple ownership can be inferred by the *results* of the comparative hearings. In 1956-1957, prior to the Barrow report, TV station owners entered into eight comparative proceedings against nonowners and were successful in five cases. During the post-Barrow period (1958-1964), station owners engaged in comparative hearings against nonowners in twelve different cases, but were successful in only four (or one-third) of the cases. While it is not possible to say with certainty that these decisions resulted from an increased concern with multiple ownership, at the end of 1964, the Commission did take a clear-cut step to limit further multiple ownership, thus indicating its feeling on the issue.

On December 18, 1964, the Federal Communications Commission issued an "Interim Policy" statement declaring "while we do not now propose a divestiture of existing interests," any future application for the acquisition of a VHF station in the top 50 markets (as established by the American Research Bureau's net weekly circulation ranking) will be designated for a hearing if "the applicant or any party thereto already owns or has interests in 1 or more VHF stations in the top 50 markets"[21] or is applying for one or more such stations. The Commission recited statistics purporting to show "the congealing of multiple ownership interests" and "a marked increase in the extent of multiple ownership, especially in television" since 1956.

The Commission set forth its concern over multiple ownership:

> . . . Briefly, our purpose is to prevent undue concentration of control in the broadcasting industry, and to encourage the development of the greatest diversity and variety in the presentation of information, opinion, and broadcast material generally. In our actions in this area, we are guided by the Congressional policy against monopoly in the communications field (e.g., as expressed in Section 313 of the Communications Act), and the concept (recognized by the courts) that the broadcasting business is, and should be, one of free competition.[22]

[19] 36 FCC, p. 925.
[20] 36 FCC, p. 936. (Material in brackets added by author.)
[21] *Federal Register*, Vol. 29, p. 18400.
[22] Ibid.

On January 18, 1965, a "Petition by 96 Television Stations for Relief from the 'Interim Policy' of December 18, 1964" was filed with the FCC. This petition was not acted upon by the Commission until its "Notice of Proposed Rule Making" issued on June 21, 1965, when the Commission rescinded its December 18 Interim Policy, supplanting it with a new "Interim Policy Concerning Acquisition of Broadcast Stations"[23] based upon a simultaneously adopted "Notice of Proposed Rule Making,"[24] which would amend Section 73.636 (Television Multiple Ownership) of the Commission's rules to bar the acquisition of more than two VHF stations or more than three television stations (UHF and VHF) in the top 50 markets (again as established by ARB's net weekly circulation ranking). Note 5 to the proposed rule stated that divestiture would not be required. The new Interim Policy stated that all future applicants falling within the prohibited ambit of the proposed rule would, "absent a compelling affirmative showing to the contrary," be designated for hearing.

The Commission Notice declared that the multiple ownership rules (termed by them "the concentration of control" rules) ". . . are designed to further two important objectives under the Communications Act: Maximum competition among broadcasters and the greatest possible diversity of programming sources and viewpoints." The statistics set forth in the December 18 Interim Policy were reiterated and new statistics were added purporting to show increasing concentration in the top 50 and top 100 television markets. The Commission then explained:

> We are proposing the 50-market cutoff for 3 reasons. These are: (a) The substantial degree of ownership concentration reached in these markets; (b) the high proportion of the total population resident in these areas and consequently the very large audiences reached by the individual VHF stations; and (c) the availability of ample economic support for individual, local ownership of both VHF and UHF stations in these markets.[25]

The Commission requested oral argument and comments directed toward two major issues — the propriety of the specific numerical limitation, and the possibility of expanding the list of evidentiary factors to be considered in determining the existence or nonexistence of a proscribed concentration in markets below the top 50. Comments were also elicited on the following "additional questions":

> (a) Is multiple ownership necessary for a licensee to undertake program production in competition with networks and other pro-

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[23]FCC 65-548.

[24]*Federal Register*, Vol. 30, p. 8166.

[25]Ibid., p. 8167.

gram suppliers? If so, what degree of multiple ownership is necessary?

(b) Will the proposed rules have any effect on the possibilities for establishment of a fourth television network?

(c) Is there any necessary correlation between a licensee's ability to present 'quality' programing and multiple ownership? If there is any such correlation, is it strong enough to outweigh the strong policy considerations favoring the widest possible diversity of ownership?

(d) Given the fact that we propose no compulsory divestiture of existing stations, what long-term increase in diversity of ownership may the proposed rules be expected to accomplish? More specifically, what increases in the number of individual owners in the top 50 markets may be expected as a result of assignments and transfers and the growth of UHF?[26]

It was in response to the FCC's June 21, 1965, proposed rule-making that 42 corporate licensees, holding over 100 television station licenses, organized the Council for Television Development. The Council commissioned an independent study of the multiple ownership question. The material presented in the following chapters is based on this study and hopefully presents a rigorous analysis of the relationship of multiple ownership to the primary policy objectives previously set forth.

[26] Ibid., p. 8168.

PART TWO

FORM OF OWNERSHIP AND ECONOMIC POWER

4

Industry and Market Structure

In its *Notice of Proposed Rule Making,*[1] the FCC stated that the level of concentration of television station ownership in the top 50 markets had been increasing and presented the data of Exhibit 1 as evidence. According to the FCC, this exhibit showed that "not only is the level of concentration in the larger markets at a high point, but it has been increasing."

Concentration refers to the market share held by a limited number of firms operating in a specific market, and is usually a pejorative term in the context of a discussion of competition, since increases in concentration are generally associated with declines in competition. The argument runs: when there are a limited number of firms competing with each other, each firm is more likely to take into account the probable reaction of its rivals in making its major decisions; this interdependence may result in identical pricing, an undue regard for the welfare of competitors, or competitive behavior which is not regarded as socially useful (e.g., exaggerated emphasis on style differences or economically meaningless promotions). However, there is a basic conceptual weakness in the use of the word "concentration" here, since it can be meaningful only if the economic entities do, in fact, compete with each other; that is, if they comprise the same "relevant market." A market has a product dimension, referred to as a "line of commerce," and a geographic dimension, referred to as a "section of the country." The two dimensions together define an area of "effective competition," and indicate a relationship between companies such that the products or services they offer are interchangeable by users.

[1]In the matter of Amendment of Section 73.636(a) of the Commission's Rules relating to Multiple Ownership of Television Broadcast Stations (Docket No. 16068), *Notice of Proposed Rule Making and Memorandum Opinion and Order.*

Exhibit 1

TOP 50 MARKETS: MULTIPLE OWNERSHIP INTERESTS, 1956 AND 1964

	1956	1964
Total VHF stations	130	156
Number of VHF stations licensed to multiple owners	75	111
Percent of VHF stations under multiple ownership	57.7	71.2
Number of VHF stations licensed to nonmultiple owners	55	45
Number of separate owners of VHF stations	88	91
Increase in number of VHF stations in 8 years	-	26
Decrease in number of single VHF owners	-	10

Source: See Appendix A.

To lump together — for statistical purposes — companies that have little economic or competitive relationship to each other makes little sense in an analysis of competition in an industry. This does not mean, however, that companies must be within the same market in order to fall under the merger prohibitions of Section 7 of the Clayton Act. A company, by reason of its economic resources and power, might have the potential to upset the competitive balance of an industry in which it has not been operating, if the industry is characterized by a number of small independent firms. Such a conglomerate merger might be prohibited under the provisions of Section 7.

Since the top 50 rule clearly involved restrictions on changes in the structure of the television broadcasting industry, and the underlying premise

Exhibit 2

TELEVISION INDUSTRY STRUCTURE: 1956 AND 1966

Market Groups[a]	Group-Owned Stations No.	Group-Owned Stations % of Total	Group-Owned Stations Index Nos.: 1966/1956	Single-Owner Stations No.	Single-Owner Stations % of Total	Single-Owner Stations Index Nos.: 1966/1956	All Stations No.	All Stations % of Total	All Stations Index Nos.: 1966/1956
				1966					
1 - 50	134	33.8%	145.7	59	30.1%	83.1	193	32.6%	118.4
51 - 100	112	28.3	233.3	52	26.5	60.5	164	27.7	122.4
101 - 150	82	20.7	256.3	40	20.4	67.8	122	20.6	134.1
151 - 200	47	11.9	235.0	28	14.3	107.7	75	12.7	163.0
201 and Over[b]	21	5.3	161.5	17	8.7	188.9	38	6.4	172.7
Total	396	100.0%	193.2	196	100.0%	78.1	592	100.0%	129.8
				1956					
1 - 50	92	44.9%	-	71	28.3%	-	163	35.7%	-
51 - 100	48	23.4	-	86	34.3	-	134	29.4	-
101 - 150	32	15.6	-	59	23.5	-	91	20.0	-
151 - 200	20	9.8	-	26	10.3	-	46	10.1	-
201 and Over[b]	13	6.3	-	9	3.6	-	22	4.8	-
Total	205	100.0%	-	251	100.0%	-	456	100.0%	-

a/ Based on American Research Bureau data listing markets according to net weekly circulation as of March 1965.

b/ Includes five stations in Alaska for which market rank is unknown.

Source: Derived from Appendix B.

of the rule appears to be that preventing specific future structural changes would produce a more competitive and diverse industry than would otherwise be the case, it will be appropriate to examine the past and present structure of the industry and to touch on matters which might affect its future structure. Such an examination can be the starting point for determining the relationship of multiple ownership to such undesirable situations as the actual or potential exercise of "undue economic power."

Appendix B presents detailed 1956 and 1966 station data for each market as well as information regarding network affiliation, size of audience and station turnover. The information is useful not only in showing trends in industry structure from which the character of competition can be seen but also in giving more direct evidence of the level of competition in television broadcasting. Summary figures on industry structure are presented in Exhibit 2, and indicate that the number of single-owner stations in the top 50 markets decreased 17% during the decade while the incidence of group-owned stations increased almost 50%.

Recasting the data of Exhibit 1 — a) to include UHF stations; and b) to update station data to 1966 (see Exhibit 3) — it can be seen that

Exhibit 3

OWNERSHIP INTERESTS IN TOP 50 MARKETS:a/ 1956 AND 1966

	1956	1966
Total Number of VHF and UHF Stations	163	193
Stations Licensed to Multiple Owners:		
Number	92	134
% of Total Number of Stations	56.4%	69.4%
Number of Stations Licensed to Single-Station Owners	71	59
Number of Separate Owners of Stations	112	119
Stations Licensed to Selected Multiple Owners:b/		
Number	57	84
% of Total Number of Nonnetwork Stations	38.8%	47.2%
Stations Licensed to Selected Single-Station Ownersc/	90	94

a/ The definition of multiple ownership used here and throughout this study is: ownership of more than one station--VHF or UHF--in any market in the 50 states. Note that satellite stations are counted separately.

b/ Note that the data reported here represent only the nonnetwork owners of two or more VHF stations (plus one or more UHF stations, in some cases) in the top 50 markets.

c/ These represent the owners of not more than one VHF station and/or one UHF station (excluding satellites) in the top 50 markets.

Source: Derived from Appendix B.

the number of single-station owners increased by 12 (instead of a decrease of 10) and that the number of separate owners of stations increased by seven (rather than three as indicated in Exhibit 1). Morever, further refinement of the data, so that multiple ownership signifies ownership of two or more VHF stations in the *top 50* markets, indicates that the incidence of nonnetwork multiple ownership (as defined here) has increased only from 39% to 47% of the total number of nonnetwork-owned VHF and UHF stations in these markets, and that the number of owners of only one station (see definition on Exhibit 3) in the top 50 markets has increased slightly, rather than decreasing. It is reasonable to include UHF stations in this analysis even though they did not — as of 1966 — have the penetration of VHF stations. Due to the passage in 1962 of the All-Channel Communication Act requiring new television sets to receive both the VHF and the UHF bands, it is estimated that UHF penetration will reach 90% by 1970. As of March 1967, the percentage of sets receiving UHF[2] in the top 10 markets was as follows:

1. New York	31%
2. Los Angeles	48
3. Chicago	48
4. Philadelphia	62
5. Boston	40
6. Detroit	57
7. San Francisco	43
8. Cleveland	40
9. Pittsburgh	40
10. Washington	61

It can be demonstrated that concentration has actually declined, regardless of the number of stations owned by groups. Exhibit 4 shows that both group and nongroup owners in all market classes have, on the average, faced more — and not fewer — competing stations, and that this is especially true for group stations. The average number of stations against which all single-owner stations competed in the 1956-1966 period rose only half as fast — 12.5% — as the group-owned stations (25%). In the top 50 markets, the average number of competing stations rose from 2.8 to 3.4 for group-owned stations and from 2.8 and 3.1 for single-owner stations. Thus, starting from similar levels of competition in 1956, group-owned stations were confronting higher levels of competition than were single-owner stations. In the 43 markets with four or more stations (including satellites) — i.e., the markets with the highest levels of competition — on the air in 1966, the group-owned stations located in these markets amounted to 39% of all group-owned stations, higher than the

[2]American Research Bureau, *February-March 1967 National Sweep.*

Exhibit 4

DISTRIBUTION OF TV STATIONS ACCORDING TO COMPETITIVE STATUS, MARKET GROUP AND TYPE OF OWNERSHIP: 1956 AND 1966

No. of Competing Stations	Group-Owned Stations in 1965 Market Groups: 1-50	51-100	101-150	151-200	201 and Over	Subtotal	Single-Owner Stations in 1965 Market Groups: 1-50	51-100	101-150	151-200	201 and Over	Subtotal
No. of Stations: 1966												
None	0	1	6	18	14	39	0	0	4	15	15	34
One	2	6	21	12	4	45	4	2	17	10	2	35
Two	47	62	35	9	3	156	19	37	16	3	0	75
Three	42	22	8	8	0	80	18	10	0	0	0	28
Four	12	8	5	0	0	25	8	2	0	0	0	10
Five	13	0	0	0	0	13	5	0	0	0	0	5
Six and Over	18	13	7	0	0	38	5	1	3	0	0	9
Total	134	112	82	47	21	396	59	52	40	28	17	196
Average No. of Competing Stations	3.43	2.73	2.41	1.15	0.48	2.59	3.14	2.31	1.90	0.57	0.12	2.04
No. of Stations: 1956												
None	2	1	6	12	7	28	1	1	13	19	9	43
One	12	15	14	7	6	54	8	21	28	5	0	62
Two	34	23	8	1	0	66	26	49	16	2	0	93
Three	26	9	0	0	0	35	18	15	0	0	0	33
Four	2	0	0	0	0	2	8	0	0	0	0	8
Five	5	0	4	0	0	9	7	0	2	0	0	9
Six and Over	11	0	0	0	0	11	3	0	0	0	0	3
Total	92	48	32	20	13	205	71	86	59	26	9	251
Average No. of Competing Stations	2.79	1.83	1.56	0.45	0.46	2.00	2.80	1.91	1.19	0.35	0.00	1.76

Source: Derived from Appendix B.

comparable figure (29%) for single-owner stations. (See Exhibit 5.) In short, while groups have been entering the most competitive markets in the top-50 market group, mergers, acquisitions and new construction have placed them in more competitive situations in other market groups as well.

Exhibit 5

NUMBER OF STATIONS IN LARGE MARKETS[a/]
BY TYPE OF OWNERSHIP: 1956 AND 1966

Market Group	Year	Group-Owned Stations	Single-Owner Stations
1 - 50	1966	85	36
	1956	44	36
51 - 100	1966	43	13
	1956	9	15
All Markets	1966	156	52
	1956	57	53

[a/] Markets with four or more stations.

Source: Derived from Appendix B.

Another way of looking at competition in television broadcasting is to examine the number of different competitors facing the respective groups in the several markets in which they operate. Exhibit 6 shows that, of the 84 stations owned by the 24 nonnetwork groups with two or more VHF stations in the top 50 markets, with five exceptions, each of these organizations competed with as many separate business entities as there were stations in the markets in which they were present. This diffusion of group-owned holdings limits the ability of the owners to coordinate their competitive activities on a company-wide basis. For example, if RKO, Westinghouse, Storer, Taft and Metromedia all had their stations in the same cities, the possibilities for oligopolistic practices (such as parallelism in pricing, programming and program production) would be greatly enhanced. In practice, however, there is neither incentive nor opportunity for such behavior and, indeed, there is no evidence of a trend in that direction.

Exhibit 6

COMPETITION IN THE TOP 50 MARKETS FOR NONNETWORK GROUPS:[a/] 1966

	Avco	Capital Cities	Chris-Craft	Corinthian	Cowles	Cox	Fisher's Blend	General Electric	Hearst	King	Meredith	Metromedia	Newhouse	RKO	Scripps-Howard	Steinman	Storer	Taft	Time-Life	Triangle	Tribune	Westinghouse	WKY TV	Wometco
Avco	-			1		1									1			2	1					
Capital Cities		-						1								1		1						
Chris-Craft			-		1		1			1		1	1	1										
Corinthian				-															1					
Cowles					-									1	1									
Cox						-			1								1					2		
Fisher's Blend							-			2			1											
General Electric								-																
Hearst									-								1					2	1	
King										-			1											
Meredith											-	1	1					1						
Metromedia												-		2				1			1			
Newhouse													-			1		1		1				
RKO														-	1					1	1	1		
Scripps-Howard															-		1	1						
Steinman																-				1				
Storer																	-						1	
Taft																		-						
Time-Life																			-		1			
Triangle																				-		1		
Tribune																					-			
Westinghouse																						-		
WKY TV																							-	
Wometco																								-

a/ The nonnetwork groups with two or more VHF stations in the top 50 markets.

Source: Derived from Appendix B.

Further evidence regarding the level of competition in television broadcasting can be observed from Exhibit 7, which points out that group-owned stations do not appear to have a significant advantage over single-owner stations in obtaining network affiliations. Of the single-owner stations in the top 50 markets in 1966, 73% were affiliated with the networks compared to 79% of the group-owned stations, and a similar difference occurred for all markets (86% vs. 93%). However, it should be noted that new entrants into markets having three or more stations find, of course, that the three networks are already affiliated. A further proof that group owners do not demonstrate undue economic power in their relations with networks is the relative absence of close network-group liaisons. Of the 17 nonnetwork groups having three or more stations in the top 50 markets, only Corinthian has all its stations affiliated with the same network.

If there were greater bargaining power on the part of group owners in obtaining network affiliations, a logical assumption would be that groups would be affiliated with the "better" and "stronger" networks, i.e., NBC and CBS rather than ABC. However, an analysis of network affiliation does not support this hypothesis. In the top 50 markets, the distribution of stations by network affiliation and type of owner for 1966 was as follows:

Network	*Group-Owned Stations*	*Single-Owner Stations*
CBS	36%	31%
NBC	31	36
ABC	33	33
Total	100%	100%

The "weakest" network, ABC, had the same proportion (33%) of stations affiliated with it for both group and single owners. Analysis of all markets leads to the same conclusion: namely, that group-owned stations were not affiliated with "better" or "stronger" networks in comparison with single-owner stations.

An additional analysis of network distribution for the period, 1960-1965, is presented in Exhibit 8, and shows that single-station owners consistently obtained a greater share of their viewing audience from CBS and NBC (27.7% and 39.2% in 1965) than from ABC (21.8% in 1965) while viewers of group-owned stations were divided equally between the three networks in 1965 (CBS, 26.9%; NBC, 28.5%; and ABC, 27.6%).

Exhibit 7

NETWORK AFFILIATION BY TYPE OF OWNERSHIP: 1956 AND 1966

	Group-Owned Stations[a]				Single-Owner Stations			
	1966		1956		1966		1956	
	No. of Stations	% of Total	No. of Stations	% of Total	No. of Stations	% of Total	No. of Stations	% of Total
Market Group: 1-50								
Affiliated	94	79.0%	63	82.9%	43	72.9%	59	83.1%
Independent	25	21.0	13	17.1	16	27.1	12	16.9
Total	119	100.0%	76	100.0%	59	100.0%	71	100.0%
All Markets								
Affiliated	353	92.7%	171	90.5%	169	86.2%	230	91.6%
Independent	28	7.3	18	9.5	27	13.8	21	8.4
Total	381	100.0%	189	100.0%	196	100.0%	251	100.0%

[a] Excludes network-owned stations; includes satellites.

Source: Derived from Appendix B.

Exhibit 8

DISTRIBUTION OF AVERAGE QUARTER-HOUR HOMES REACHED
BY NETWORK AND TYPE OF OWNER: 1960-1965

Type of Owner[a]	No. of Stations Included[b]	1960	1961	1962	1963[c]	1963[c]	1964	1965
Group-Owned Stations:								
CBS	76	31.2%	28.6%	30.0%	32.1%	32.8%	31.5%	26.9%
NBC	76	25.4	23.4	27.5	26.1	26.5	26.3	28.5
ABC	58	23.9	34.2	22.8	22.1	23.4	24.4	27.6
CBS and ABC	37	5.2	5.0	4.7	5.0	4.9	4.6	4.3
NBC and ABC	34	3.9	4.0	4.2	4.1	4.0	4.1	4.1
CBS and NBC	7	1.0	1.0	1.1	1.1	1.0	1.0	0.9
CBS and NBC and ABC	19	1.7	1.6	1.7	1.7	1.6	1.6	1.6
Subtotal	307	92.3%	92.8%	92.0%	92.2%	94.2%	93.5%	93.9%
Independents	19	7.7	7.2	8.0	7.8	5.8	6.5	6.1
	326	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%
Single-Owner Stations:								
CBS	41	31.1%	29.9%	29.1%	31.9%	32.4%	32.1%	27.7%
NBC	45	37.5	36.6	40.1	37.4	37.0	36.8	39.2
ABC	31	18.9	20.9	18.2	18.3	18.5	19.6	21.8
CBS and ABC	15	5.0	5.1	5.0	5.3	5.1	4.7	4.5
NBC and ABC	11	5.2	5.2	5.4	4.8	4.7	4.7	4.7
CBS and NBC	4	1.1	1.0	1.0	1.0	1.0	1.0	1.0
CBS and NBC and ABC	3	0.7	0.7	0.6	0.6	0.6	0.5	0.5
Subtotal	150	99.5%	99.4%	99.4%	99.3%	99.3%	99.4%	99.4%
Independents	3	0.5	0.6	0.6	0.7	0.7	0.6	0.6
Total	153	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

a/ Note that type of owner represents status as of September 1, 1964.

b/ The 479 stations included in this analysis represent 86% of the 558 stations on the air as of September 1, 1964.

c/ In 1963, the basis for circulation estimates changed from 6:00 P.M. - 10:00 P.M. (New York time) viewing to 7:30 P.M. - 11:00 P.M. (New York time) viewing; for comparative purposes, 1963 data are reported on both bases.

Source: Association of National Advertisers, Inc., Television Circulation and Rate Trends, 1959-64 and 1965.

Another economic question which can be partially answered by looking at industry structure is whether group stations belong to organizations which are substantially stronger economically than those of their single-station competitors. Virtually all stations in the top 50 markets — both group and single — were parts of conglomerate enterprises, and the single owners were almost invariably affiliated with substantial financial interests in other industries. Newspaper ownership is a prime example of such interests; other owners of single stations in the top 50 markets include General Electric (until its recent acquisition of a second station), the Catholic Church (until the recent sale of its station in Boston), the Travelers Insurance Company and Twentieth-Century Fox. It can, therefore, hardly be argued that large group owners derive exceptional economic strength in comparison with single owners because of the organizations to which they belong.

Based on the above analysis of the structure of the industry, some judgments will be made concerning future structural trends. Groups have entered, and presumably will continue to enter, the most competitive markets as these markets grow in number (and in number of stations) with an awakening UHF. Judging from past trends, groups may be expected to operate increasing numbers of independent stations (since these are most often situated in the largest markets). This may enable groups to provide a competitive alternative to the national network system. There is no reason why new group entrants to the UHF band would not enter via new construction instead of merger if the Commission's discriminatory treatment of the groups in comparative hearings were dropped, or if those hearings were further simplified and shortened. Even if the Commission's hearings policies continue virtually to force groups to enter via acquisition, it is hard to interpret the influx of groups into the most competitive markets as anything but procompetitive.

Group entry into a market has different implications depending on the nature of the market. For example, it might be argued that group entry into *single-owner only markets* potentially poses the most serious anticompetitive threat, since it would be in such markets that group entry would most likely upset the competitive balance and the hypothetically equal distribution of market power among the incumbent firms. In *group-owner only markets,* on the other hand, it is hard to see how permitting the entry of another group will upset the balance among the group incumbents or the existing distribution of power in those markets. The situation is somewhat less clear in mixed markets, characterized by both group and nongroup incumbents. But in *mixed markets,* any alteration of competitive balance or power distribution resulting from group entry is less than in single-owner only markets since group entry has already occurred.

Experience regarding group acquisitions and changing ownership

Exhibit 9

GROUP ACQUISITIONS AND CHANGING OWNERSHIP STRUCTURE
IN THE TOP 100 MARKETS: 1956 AND 1966

Number of markets where:	Market Groups 1-50	Market Groups 51-100
Type A group entrant now confronts one or more group-owned stations, but no single-owner stations	9	5
Type A group entrant now confronts one or more single-owner stations only, and no group-owned stations	2	1
Type A group entrant now confronts both single- and group-owned stations	19	15
Type B group entrant now confronts one or more group-owned stations, but no single-owner stations	4	4
Type B group entrant now confronts one or more single-owner stations only, and no group-owned stations	0	2
Type B group entrant now confronts both single- and group-owned stations	6	8
Type C group entrant now confronts one or more group-owned stations, but no single-owner stations	2	6
Type C group entrant now confronts one or more single-owner stations only, but no group-owned stations	1	1
Type C group entrant now confronts both single- and group-owned stations	6	7

Key:

Type A Group Entrants: a group owner in 1956 who entered a new market by 1966 either by (a) buying a singly-owned station there; (b) buying a group-owned station there; or (c) building a new station there.

Type B Group Entrants: a single-station owner in 1956 who by 1966 becomes a group owner either by (a) buying a singly-owned station elsewhere; (b) buying a group-owned station elsewhere; or (c) building a station elsewhere.

Type C Group Entrants: a nonowner in 1956 who by 1966 becomes a group owner in either of the three ways indicated a above.

Note that this tabulation includes "double counting"; that is, each entry into a market since 1956 was counted rather than the entrants.

Exhibit 10

GROUP-OWNED ONLY, SINGLE-OWNER ONLY AND MIXED MARKETS: 1966

	Market Group: 1-50		Market Group: 51-100		All Markets[a]	
	No. of Stations	% of Total	No. of Stations	% of Total	No. of Stations	% of Total
Markets with Group-Owned Stations Only	11	22.0%	13	26.0%	84	36.5%
Markets with Single-Owner Stations Only	2	4.0	2	4.0	45	19.6
Mixed Markets	37	74.0	35	70.0	101	43.9
Total	50	100.0%	50	100.0%	230	100.0%

[a] Excludes Alaska.

Source: Derived from Appendix B.

structure in the top 100 markets between 1956 and 1966 (presented in Exhibit 9) reveal three basic findings.

First, of the 98 group acquisitions tabulated, only seven were cases in which the group owner entered an exclusively single-owner market. Only in these few cases could group entrants pose the sort of danger traditionally attributed to them; i.e., the intimidation or coercion of incumbent nongroup stations.

Second, for the 30 cases where group entrants merely confronted other group owners, none of the alleged anticompetitive effects could have occurred. In the remaining 61 cases where the group entrants faced both group and nongroup stations, it is hard to see how keeping out the new group entrants would preserve competitive balance.

Third, Type B group entrants (single owners becoming group owners) warrant special comment. Of the 24 Type B entries between 1956 and 1966, two-thirds were by owners already facing group competition. The prohibition of these acquisitions would merely have prevented the allegedly harassed single owner from bettering his competitive position against incumbent group rivals. Even granting the unverified assumption of group power, in only seven out of 98 cases might a serious problem have arisen, suggesting that these might be better handled on an *ad hoc*, case-by-case basis rather than by discriminatory control of access to the top markets.

At this point it might be useful to determine how widespread single-owner only markets are compared with group-owner only or mixed markets. An analysis of Exhibit 10 shows that there were four single-owner only markets left in the top 100 markets in 1966, and only 45 in the nation as a whole — less than one-fifth of all TV markets. All other markets were group-owned only (36%) or mixed (44%). Thus, the force of regulatory policy to prevent any potential abuse of power by groups would have to occur in the bottom 50 or 100 markets, not in the *top* 50 or 100!

5

Competitive Performance in Television Broadcasting

HAVING LOOKED AT the market structure of television broadcasting, the economic performance of the industry will be examined to see if there is any indication that nonnetwork groups exercise undue economic power. Competition among television broadcasting companies occurs primarily in three interrelated arenas: for advertising dollars; for audience (through the selection and scheduling of program material); and in the production of program material.

Commercial television is supported by revenues from the sale of national and local spot advertising. All television organizations in the country compete with one another to some extent for national advertising, either directly or indirectly, through representatives and networks. However, since advertisers are increasingly seeking to "blanket" particular areas of the country as part of selected marketing programs, the sale of national spot advertising usually involves a series of local competitive arenas rather than a broad national market. Competition for local advertising occurs predominantly in local markets, the competitors being limited to those stations present in each market.

The question of restriction of competition in the sale of national advertising does not appear to be a serious threat. Since over 300 corporate organizations sell announcement time, considerable intermedia competition exists and constant market fluctuations occur as individual programs rise or fall in popularity. Interestingly, parallelism and other forms of behavior characteristic of most oligopolistic situations are not evident and are apparently not an area of concern to the Commission.

To test this supposition, the cost per thousand homes reached based on prime 20-second spot rates[1] for both group-owned and single-owner stations was compared. As seen in Exhibit 11, there was no difference in the overall averages for the group-owned stations vs. the single-owner stations ($3.27 and $3.28, respectively, in 1965), and the figures for the two top market groups resembled each other closely. For market group 101-150, group-owned station averages were slightly, but not significantly, higher, while for the market group with the smallest audiences the single-owner stations showed higher cost-per-thousand figures. Thus, it is apparent that group owners have not been able to negotiate more advantageously with their advertisers.

Since it was determined that there were no significant differences in spot rates for nonnetwork-owned groups and single stations, network time sales will be examined. In order to ascertain whether or not group-owned stations have more bargaining power with networks than do single-owner stations, an analysis was made of "estimated average quarter-hour homes reached" and "network gross Class A hourly time charges."[2] Exhibit 12 presents data on cost-per-thousand homes reached, classified by market group and type of owner, for 1964 and 1965.

Not only is there no evidence of greater bargaining power on the part of groups, but the opposite conclusion can be supported. In the top 50 markets (and in all markets), cost-per-thousand figures for single-station owners were higher. If groups were able to coerce networks and obtain an unfair competitive advantage *vis-à-vis* single owners, the cost-per-thousand figures would presumably be higher for groups. The lower figures for group-owned stations show that for delivering the same size audience the group owner received less from the sponsor (through the network) than a similar single-owner station. As shown in Exhibit 13, for those stations operating during the period, group-owned stations delivered a greater audience than single-owner stations for the same dollar.

It can be seen from viewer data classified by network affiliation and type of owner that, with very few exceptions, the averages for single-owner stations were higher than those for the group-owned stations—in some cases by almost $3.00 per thousand viewers reached. Further inspection of the data in Exhibit 14 reveals that the differences between group-owned cost-per-thousand averages and those for single owners were narrowest for CBS and greatest for ABC.

The second major arena of competition among television stations is

[1]The rate charged for a 20-second commercial in prime time (7:30 P.M. to 11:00 P.M.).

[2]The "estimated average quarter-hour homes reached" is the average number of homes viewing all home market television stations during the average quarter hour during the specified day-part according to the American Research Bureau (ARB) survey. The "network gross Class A hourly time charge" is the amount the network charges a sponsor for station time during prime time.

Exhibit 11

COST PER THOUSAND HOMES REACHED BY MARKET GROUP AND TYPE OF OWNER: 1964 AND 1965
(Based on Prime 20-Second Spot Rates)

Market Group and Type of Owner[a]	No. of Stations Included	Cost per Thousand Based on Prime 20-Second Spot Rates 1964	1965
Markets 1 - 50:			
Group-Owned Stations	99	$3.16	$3.23
Single-Owner Stations	32	3.19	3.21
Subtotal	131		
Average Cost per Thousand Homes		$3.17	$3.23
Markets 51 - 100:			
Group-Owned Stations	91	$3.35	$3.46
Single-Owner Stations	46	3.33	3.34
Subtotal	137		
Average Cost per Thousand Homes		$3.34	$3.42
Markets 101 - 150:			
Group-Owned Stations	70	$3.17	$3.21
Single-Owner Stations	32	3.07	3.02
Subtotal	102		
Average Cost per Thousand Homes		$3.14	$3.14
Markets 151 and Over:			
Group-Owned Stations	59	$3.49	$3.46
Single-Owner Stations	35	4.26	4.32
Subtotal	94		
Average Cost per Thousand Homes		$3.73	$3.72
All Markets:			
Group-Owned Stations	319	$3.20	$3.27
Single-Owner Stations	145	3.28	3.28
Total	464		
Average Cost per Thousand Homes		$3.22	$3.27

[a] Market groups are based on the American Research Bureau's March 1965 net weekly circulation figures, and type of owner represents status as of June 23, 1966.

Source: Association of National Advertisers, Inc., Television Circulation and Rate Trends, 1959-1964 and 1965.

Exhibit 12

COST PER THOUSAND HOMES REACHED BY MARKET GROUP AND TYPE OF OWNER: 1964 AND 1965
(Based on Average Quarter-Hour Homes Reached and Network Gross Class A Hourly Time Charges)

Market Group and Type of Owner[a]	No. of Stations Included	Cost per Thousand Based on Network Hourly Rates 1964	1965
Markets 1 - 50:			
Group-Owned Stations	99	$11.94	$11.78
Single-Owner Stations	32	12.97	13.20
Subtotal	131		
Average Cost per Thousand Homes		$12.10	$11.99
Markets 51 - 100:			
Group-Owned Stations	91	$15.25	$15.07
Single-Owner Stations	46	15.12	14.90
Subtotal	137		
Average Cost per Thousand Homes		$15.21	$15.01
Markets 101 - 150:			
Group-Owned Stations	70	$14.49	$14.77
Single-Owner Stations	32	14.84	14.68
Subtotal	102		
Average Cost per Thousand Homes		$14.61	$14.74
Markets 151 and Over:			
Group-Owned Stations	59	$14.51	$14.40
Single-Owner Stations	35	14.73	14.91
Subtotal	94		
Average Cost per Thousand Homes		$14.58	$14.56
All Markets:			
Group-Owned Stations	319	$12.74	$12.61
Single-Owner Stations	145	14.02	14.04
Total	464		
Average Cost per Thousand Homes		$13.02	$12.92

a/ Market groups are based on American Research Bureau's March 1965 net weekly circulation figures, and type of owner represents status as of June 23, 1966.

Source: Association of National Advertisers, Inc., Television Circulation and Rate Trends, 1959-1964 and 1965.

Exhibit 13

COST PER THOUSAND HOMES BY MARKET GROUP AND TYPE OF OWNER: 1960-1965
(Based on Average Quarter-Hour Homes Reached and Network Gross Class A Hourly Time Charges)

Market Group and Type of Owner[a]	No. of Stations Included[b]	Cost per Thousand Based on Network Hourly Rates						
		1960	1961	1962	1963[c]	1963[c]	1964	1965
Markets 1 - 50:								
Group-Owned Stations	101	$13.20	$12.15	$13.08	$13.10	$11.93	$12.13	$11.83
Single-Owner Stations	39	14.49	14.81	14.24	13.84	12.86	13.16	13.24
Subtotal	140							
Average Cost per Thousand Homes		$13.43	$12.63	$13.30	$13.24	$12.11	$12.33	$12.10
Markets 51 - 100:								
Group-Owned Stations	90	$15.24	$15.48	$15.31	$15.14	$14.69	$15.23	$14.99
Single-Owner Stations	52	15.88	15.84	15.94	14.96	14.35	15.04	14.70
Subtotal	142							
Average Cost per Thousand Homes		$15.49	$15.62	$15.56	$15.07	$14.55	$15.15	$14.87
Markets 101 - 150:								
Group-Owned Stations	68	$12.54	$12.28	$13.45	$13.44	$13.16	$13.74	$14.07
Single-Owner Stations	32	13.66	13.96	13.84	14.23	13.93	14.61	14.40
Subtotal	100							
Average Cost per Thousand Homes		$13.03	$12.88	$13.60	$13.73	$13.44	$14.06	$14.18
Markets 151 and Over:								
Group-Owned Stations	48	$12.35	$12.45	$12.36	$13.77	$13.57	$14.90	$14.85
Single-Owner Stations	27	14.92	15.32	14.96	14.87	14.37	15.90	16.25
Subtotal	75							
Average Cost per Thousand Homes		$13.87	$13.34	$13.17	$14.12	$13.83	$15.21	$15.28
All Markets:								
Group-Owned Stations	307	$13.45	$12.67	$13.44	$13.48	$12.50	$12.81	$12.57
Single-Owner Stations	150	14.86	15.04	14.74	14.29	13.52	14.03	13.96
Total	457							
Average Cost per Thousand Homes		$13.81	$13.77	$13.77	$13.69	$12.76	$13.11	$12.92

a/ Market groups are based on American Research Bureau's March 1964 net weekly circulation figures, and type of owner represents status as of September 1, 1964.

b/ The stations included here represent all stations for which complete data were available for the entire period--i.e., only those stations which were in operation for the six-year period.

c/ In 1963 the basis for circulation estimates changed from 6:00 P.M. - 10:00 P.M. (New York time) viewing to 7:30 P.M. - 11:00 P.M. (New York time) viewing; for comparative purposes, 1963 data are reported on both bases.

Source: Association of National Advertisers, Inc., *Television Circulation and Rate Trends*, 1959-1964 and 1965.

Exhibit 14

COST PER THOUSAND HOMES BY NETWORK AFFILIATION AND TYPE OF OWNER: 1960-1965
(Based on Average Quarter-Hour Homes Reached and Network Gross Class A Hourly Time Charges)

Network Affiliation and Type of Owner[a/]	No. of Stations Included[b/]	Cost per Thousand Based on Network Hourly Rates						
		1960	1961	1962	1963[c/]	1963[c/]	1964	1965
CBS:								
Group-Owned Stations	76	$13.44	$13.80	$13.40	$12.55	$11.64	$12.32	$14.29
Single-Owner Stations	41	13.79	14.34	14.50	12.83	11.94	12.45	14.56
Total	117							
Average Cost per Thousand Homes		$13.52	$13.93	$13.65	$12.62	$11.72	$12.35	$14.36
NBC:								
Group-Owned Stations	76	$14.24	$14.61	$13.01	$13.72	$12.79	$13.22	$11.71
Single-Owner Stations	45	15.53	15.95	14.11	14.57	13.95	14.71	13.63
Total	121							
Average Cost per Thousand Homes		$14.65	$15.03	$13.35	$13.99	$13.15	$13.68	$12.29
ABC:								
Group-Owned Stations	58	$13.37	$12.33	$14.37	$14.66	$13.11	$12.48	$11.05
Single-Owner Stations	31	16.23	15.16	17.28	16.58	15.54	14.94	13.27
Total	89							
Average Cost per Thousand Homes		$13.94	$12.90	$14.95	$15.07	$13.60	$12.98	$11.49

a/ Type of owner represents status as of September 1, 1964.
b/ The stations included here represent all stations for which complete data were available for the entire period--i.e., only those stations which were in operation for the six-year period.
c/ In 1963 the basis for circulation estimates changed from 6:00 P.M. - 10:00 P.M. (New York time) viewing to 7:30 P.M. - 11:00 P.M. (New York time) viewing; for comparative purposes, 1963 data are reported on both bases.

Source: Association of National Advertisers, Inc., Television Circulation and Rate Trends, 1959-1964 and 1965.

for audience, primarily through the selection and scheduling of program material or programming. In performing this function, stations are most like supermarkets which decide which items they will stock and offer for sale from the array of products made available by manufacturers (and which they conceivably could produce themselves). Programming is the basic product which television provides and all of the other activities of television stations either capitalize on programming or are directed toward improving it. It is the vehicle for television's public service and information function, and inherently involves competitive decisions based on local conditions since each station's programming must take into account the program offerings of its local competitors.

Networks have an advantage over both nonnetwork group-owned and single-owner stations in purchasing programs from independent syndicators and producers. This results from the economics of selling such productions, since making one sales call to a network is less expensive and time-consuming than separate sales efforts to individual or small groups of stations. Also, the networks can pay higher prices for independently-produced program material because of the large number of stations they represent. Similarly, groups have somewhat better access to certain types of independent program material than do single-owner stations. However, independent program suppliers face markets that are not sufficiently concentrated to permit domination by a nonnetwork group. Here each market is a separate area of competition so far as programming decisions are concerned, and since groups are not concentrated in the same markets, all the stations in a given market are open to suppliers. Even with the maximum incidence of group ownership under the present rule, it seems improbable that any group or combination of groups could dominate the program supply industry.

The relative unimportance of group headquarter purchases of independently-produced programming is indicated by the results of a mail survey of stations.[3] Among the 59 nonnetwork group stations responding to the survey, central group purchases accounted for less than 2% of total program purchases. The reason for this is that local managers want control over their programming since both they (and headquarters) feel that many programs offered for sale frequently do not meet the local tastes and competitive requirements of all of the markets in which a group has stations. For this reason, station managers frequently turn down offers by group headquarters to purchase programs centrally. For example:

> KMBC-TV, Kansas City (Metromedia), turned down a 90-minute "Murray the 'K' Special" because it was "not suitable for this market and community."

[3]See Appendix D.

WOR-TV, New York City (RKO General), refused to run "Catman and Reuben" because it was "unacceptable" and turned down "Roaring Wheels" on the grounds that there was no local interest in programs on auto racing.

WALA-TV, Mobile (Royal Street Corp.), has never broadcast a program purchased and recommended by group headquarters. The WALA-TV station manager stated that because of his intense involvement in community activities in Mobile, he alone is qualified to select and purchase programs suited to local tastes and requirements.

Moreover, even when there is central purchasing, there do not seem to be any cost savings for the individual stations. Many station managers contend that they can usually purchase programs for the same price (and sometimes for less) that group headquarters can. For example:

WNEP-TV, Scranton (Taft), finds it less expensive to purchase film directly than to acquire it through group headquarters.

Although the Cox group headquarters employs a film buyer, the Cox station in Oakland/San Francisco (KTVU) purchases all its own film. KTVU's station manager states that "Ownership by Cox does not offer KTVU any price advantages with regard to program purchases."

Chris-Craft occasionally purchases programs centrally through KCOP-TV, Los Angeles. However, Chris-Craft's president notes that ". . . this does not result in better prices — the only possible advantage is that film is often more available in Los Angeles." This was corroborated by the station manager of WTCN-TV, Chris-Craft's station in Minneapolis. He said that by competing for programs with the network affiliates in his own market he generally paid less than he would pay for the same program acquired through group headquarters.

Program production is the third — and an entirely separate — competitive arena. Producers of programs may or may not own television stations, and television stations may or may not undertake significant program production activity, either by themselves or by direct support of producing organizations. A substantial portion of program production is national in scope, although local live production constitutes an important submarket, particularly in the arena of local news and public affairs shows. A recent study on television program production[4] developed data on the number of

[4]Arthur D. Little, Inc., *Television Program Production, Procurement and Syndication: An Economic Analysis Relating to the Federal Communications Commission's Proposed Rule in Docket No. 12782,* Vols. I and II, February 1966.

independent producers engaged in program production for network prime time entertainment series. The total number of active producers follows.[5]

Year	*Number*
1957	76
1958	70
1959	67
1960	70
1961	67
1962	70
1963	66
1964	65

This has not been a static list but has been characterized by new entry as more than 200 individual producers were active in the above eight years.[6]

In addition to the large number of producers engaged in supplying prime time entertainment series to the networks, there are a great number of firms supplying specials, series and other programming to nonnetwork stations. Thus, the arena of competition in the program production area is highly competitive and basically unaffected by the nature of ownership as between nonnetwork groups and single stations. In conclusion, there is no evidence that nonnetwork group owners have any advantages over single stations in competing for advertising, for audiences and for program production.

Another indication of whether groups have undue economic power as compared with single owners is to examine their relative profitability. The assumption here is that the advantages flowing from a less than optimally competitive system would be reflected in substantially greater profits for those broadcasters allegedly benefiting from an advantageous position in the industry; that is, group owners should be realizing monopolistic profits.

The following financial analysis is based on information submitted to the Commission by each broadcaster (in Financial Report No. 324) for the year 1964. The data were processed by the FCC staff; and, in order to maintain confidentiality, all the averages shown represent the results for three or more stations. The measure used is profits before taxes expressed as percentages of broadcast revenue. Weighted averages for group-owned and single-owner stations — by market group, by net weekly circulation and by number of stations under common ownership — are presented in Exhibits 15 through 17.

As shown in Exhibit 15, there was a direct relationship between market size and profit ratio. The relationship between group ownership and

[5]Ibid., Vol. II, p. 89.
[6]Ibid., Vol. II, p. 98.

Exhibit 15

PROFIT DATA CLASSIFIED BY TYPE OF OWNER AND MARKET GROUP: 1964

Market Group	Group-Owned Stations			Single-Owner Stations		
	No. of Stations	% of Total	Profit Ratio	No. of Stations	% of Total	Profit Ratio
1 - 50	120	39.9%	39.1%	48	23.0%	37.4%
51 - 100	78	25.9	24.3	58	27.7	18.1
101 - 150	51	16.9	18.9	41	19.6	16.4
151 and Over	52	17.3	15.1	62	29.7	(1.7)
Total	301	100.0%	35.2%	209	100.0%	26.1%

Note: Parentheses indicate a loss.

Source: Federal Communications Commission.

profit was less apparent, and only in the smallest markets (151 and over) was there a substantial difference (a profit of 15.1% for group-owned stations vs. a loss of 1.7% for single-owner stations). However, it is not certain that groupness accounted for this difference; as shown later in this chapter, age of station may have had a greater effect on profitability than type of owner.

When the profit data for network-affiliated stations were classified by size of audience (as measured by net weekly circulation), we see that single-owner stations apparently outperformed group-owned stations in the larger markets (see Exhibit 16). While the group-owned stations show an advantage over single-owner stations in the markets with net weekly circulation of less than 500,000, single-owner stations apparently outperformed group-owned stations in those markets with net weekly circulation of more than 500,000. (However, these large markets accounted for only 29.5% of the broadcast revenue of single-owner stations while representing 60.9% of all group-owned stations' revenue.)

Exhibit 16

PROFIT DATA FOR NETWORK-AFFILIATED STATIONS CLASSIFIED BY TYPE OF OWNER AND SIZE OF AUDIENCE: 1964

Net Weekly Circulation	Profit Ratios		
	Group-Owned Stations	Single-Owner Stations	All Stations
1,000,000 and Over	41.6%	53.8%	42.3%
751,000 - 1,000,000	35.7	42.1	37.8
501,000 - 750,000	36.3	40.1	37.1
251,000 - 500,000	34.7	23.8	30.5
151,000 - 250,000	22.6	19.0	21.4
101,000 - 150,000	18.5	15.8	17.5
51,000 - 100,000	14.9	3.6	11.4
26,000 - 50,000	10.7	(4.4)	4.0
25,000 and Under	(5.9)	(24.0)	(12.3)
All Markets	35.0%	26.5%	33.0%

Note: Parentheses indicate losses.

Source: Federal Communications Commission.

It would appear from this analysis that the thrust of the top 50 rule is directed, if anything, toward the wrong market segment. Stations (singly-owned or group-owned) in the larger markets appear to have no difficulty in attaining relatively high profits, while stations in the smallest markets — outside the effect of the top 50 market ownership limitation — struggle for subsistence.

Since the Commission uses as a standard the number of stations owned, this measure was used as the basis of further analysis. Exhibit 17 presents profit ratios according to the number of stations owned. There appears to be little difference in profitability for single-station owners and groups owning two or three stations. Indeed, single-owner stations had slightly higher profit margins (26.5%) than did groups of two (23.1%) or three (24.1%) stations. Among the larger groups — those with four and more stations — the level of profitability was somewhat higher than for single stations and groups with fewer than four stations. (The high ratio recorded for the five-station group reflects the profitability of the network owned-and-operated stations.)

Exhibit 17

PROFIT DATA CLASSIFIED BY
NUMBER OF STATIONS OWNED: 1964

No. of Stations Owned	Profit Ratios
1	26.5%
2	23.1
3	24.1
4	35.2
5	44.3
6 and Over	31.8

Source: Federal Communications Commission

While it is evident that pre-tax profits in TV broadcasting are high, there is no substantial difference between the profits of groups and single owners. Moreover, it may be questioned whether the high profitability of many stations in the 50 major markets is consistent with a contention of a lack of anticompetitive behavior. Since blocked entry into VHF produces an artificial shortage of commercial time in large markets, time is worth more to advertisers and is sold for more than it costs the broadcaster. The resulting high profits thus reflect a techno-regulatory shortage that has forced prices up, rather than restraint of competition by oligopolistic or monopolistic behavior.[7] An analogy might be made to tobacco growing, generally a very profitable business for a farm with a sizable acreage allotment: the restrictions on acreage (stemming from the price support program) make the business highly profitable, but certainly no one grower's situation or practices can be said to be responsible for high profitability.

Commissioner Nicholas Johnson has been concerned about the level of profits in television broadcasting.

> The television industry earns an average 100% *annual* return on investment in tangible property. These near-monopoly profits are made possible through the use of public property — spectrum space. No individual is entitled, as a matter of legal or moral right, to more than one piece of such rich pie.[8]

The argument would seem to be that "near-monopoly profits" are acceptable provided that more organizations can share in them. If Congress and the Commission are, in fact, concerned with profit levels in television broadcasting, there are a number of more direct approaches they can take, rather than using the cumbersome multiple ownership limitation.

Concern has been expressed by the Commission, not only with the level of operating profits but also with the relative magnitude of the *capital gains* accruing when stations are sold and with stability of tenure. The Commission's concern with stability is illustrated by its rule requiring licensees to hold a station for a three-year period as well as by frequent pronouncements in the regulatory literature. They seem to question: How can an owner gain experience and intimate knowledge in a community other than by staying with his station for a substantial period? And how can the community derive benefits from this accumulated experience and intimate knowledge of needs and tastes?

Part and parcel of the "trading" phenomenon, of course, are the magnitude of capital gains or the level of capital charges imposed on station buyers. Although the Commission's concern in these areas is not always clear, the logic appears to be: If inflated capital charges are passed on to buyers in TV transfers, then — in some sense at least — the buyer may find it difficult to live up to the Commission's program service standards. Without accepting their validity, these premises should be examined.

To examine the capital gains and capital charges issues, a comprehen-

[7]However, with the increasing effect of the All-Channel Communications ruling, there should be a lowering of profits.

[8]In the Matter of Amendment of Section 73.636(a) of the Commission's Rules relating to Multiple Ownership of Television Broadcast Stations (Docket No. 16068), *Report and Order*, adopted February 7, 1968; released February 9, 1968 (see Appendix A).

sive multivariate analysis of sales prices was performed, using as many explanatory variables as the availability of comparable data permitted.[9] This analysis covered 198 TV station sale transactions, about 65% of all such transactions during the 1949-1965 period.[10] Essentially the following question was asked: What is the relative importance of (a) market size, (b) network affiliation, (c) age of station, (d) "groupness" of ownership and (e) type of channel,[11] in explaining the level of TV station sales prices. Or, stated otherwise, did the prices at which TV stations were sold during the years 1949-1965 vary significantly between group-owned and nongroup-owned stations when full account was taken of differences in market size, network tie, age or channel type?

The explanatory variables selected are by no means all-inclusive: e.g., one might have liked to include "number of stations in the market," and net weekly circulation is probably a better index of market size than number of TV homes or TV sets.[12] Practical limitations governed the selection of the explanatory variables. A prime objective was to use as many as possible of the sales price observations, and towards that end, to limit the analysis to pertinent explanatory variables which could be compiled in the necessary detail.

The results of the sales price regression analyses are summarized in Exhibit 18 and the following findings can be noted.

1. a) Overall, the selling price of a TV station was primarily dependent on market size; age of station and network affiliation had substantially lower explanatory power; and type of seller exerted relatively little weight on the sales price. b) For the top 50 markets, number of TV homes was again the most important factor in the sales price; however, here network affiliation had relatively more effect than type of seller or age of station. c) In the top 100 markets, number of TV homes was once more the most potent of the four variables in explaining the variations in sales price.
2. a) In all sales by single-station owners, the type of buyer was least relevant in explaining sales prices, with the number of TV homes most significant. b) The analysis of single-station owner sales in the top

[9]This approach was developed by Harvey J. Levin.

[10]See Appendix C for a more detailed explanation of the sales price analysis.

[11]Although the UHF portion of the sample was small, the statistical analysis of UHF station sales prices revealed no significant trends with regard to the influence either of groupness or of any other explanatory variable. Presumably, other forces have been operating in the UHF band and will continue to do so until penetration increases.

[12]Net weekly circulation did emerge as a significant predictor in a separate analysis of sales prices in a more limited sample. It should also be noted that number of stations in the market emerged as a significant explanatory variable in another analysis which was made of the relative potency of: (a) number of stations, (b) network tie, (c) channel number, (d) ratio of V's to U's and (e) groupness, in explaining prime time quarter-hour viewing.

Exhibit 18

SUMMARY DATA OF SALES PRICE REGRESSION ANALYSIS: 1949-1965

	Variables[a/]	Standardized Regression Coefficients
	All Markets	
Total Sample	No. of TV Homes	0.5604
	Age of Station	0.1595
	Network Affiliation	0.1443
	Type of Seller	0.0484
Single-Owner Station Sales	No. of TV Homes	0.4749
	Age of Station	0.2410
	Network Affiliation	0.1307
	Type of Buyer	0.1126
Group-Owned Station Sales	No. of TV Homes	0.6378
	Network Affiliation	0.1499
	Age of Station	0.0616
	Type of Buyer	0.0414
	Top 50 Markets	
Total Sample	No. of TV Homes	0.4913
	Network Affiliation	0.2918
	Type of Seller	0.1146
	Age of Station	0.0492
Single-Owner Station Sales	No. of TV Homes	0.2947
	Age of Station	0.2889
	Type of Buyer	0.2785
	Network Affiliation	0.2486
Group-Owned Station Sales	No. of TV Homes	0.5436
	Network Affiliation	0.2571
	Type of Buyer	0.1478
	Age of Station	-0.0572
	Top 100 Markets	
Total Sample	No. of TV Homes	0.4691
	Age of Station	0.1936
	Network Affiliation	0.1643
	Type of Seller	0.0400
Single-Owner Station Sales	No. of TV Homes	0.3311
	Age of Station	0.3149
	Type of Buyer	0.1702
	Network Affiliation	0.1655
Group-Owned Station Sales	No. of TV Homes	0.5710
	Network Affiliation	0.1356
	Age of Station	0.0856
	Type of Buyer	0.0463

a/ Listed in descending order of the value of the standardized regression coefficients (which describe the relative importance of the independent variables in explaining sales price variations).

50 markets indicated that all four variables had equal—but relatively insignificant—explanatory power. c) For such sales in the top 100 markets, the ownership status of the buyer and network affiliation were least significant in explaining sales prices, and again market size was the major determinant, with age of station equally important.

3. For sales of stations by group owners, the analysis once again indicated that number of TV homes was substantially more powerful in explaining the variations in sales price, and type of buyer, relatively insignificant.

While *market size* is seen to be the principal factor explaining sales prices for all categories of sales here analysed, this does not mean to suggest that licensee initiative or program popularity or station profitability bear no weight in the determination of sales prices. However, these factors either did not lend themselves to statistical analysis (e.g., licensee initiative) or were unavailable for use (e.g., station profitability). Therefore, our finding of market size as the major determinant of station sales prices must be considered in the context of the other variables used in the regression analysis.[13]

It is interesting to note that the impact of network affiliation (or nonaffiliation) on sales prices was greater in the top 50 markets than type of seller or age of station. Since this does not appear to be true on an overall basis, one must conclude that, while affiliation with any particular network has no relevancy to sales price, affiliation *per se* has some significance. Although the significance of age of station in explaining sales price variations is relatively low, it appears that this factor emerges as somewhat more potent than either network affiliation or type of buyer in the analysis of single-owner station sales. However, this phenomenon may probably be attributed to the tendency of the FCC to favor new or nongroup applicants in the granting of licenses (and, of course, the fact that the industry started with single-station owners).

Thus, it is evident that other factors are better able to explain the variations in sales price than type of ownership of the seller or buyer of a station.

Therefore, should the Commission wish to relax its group ownership policies, there are no grounds to fear either disproportionate capital gains or the imposition of inflated capital charges on station buyers. If the Commission or Congress is concerned with what they may consider excess capital gains, it would seem preferable to deal with the situation directly and

[13]The effectiveness of the four factors in explaining the variations in the sales prices can be noted by referring to the R^2 values shown in Appendix Exhibits C-1 through C-9.

not by limiting group ownership.

It may be concluded that the top 50 rule would have been an improper instrument for regulating the television broadcasting industry, since the rule would have frozen the inherently superior economic base of network owned-and-operated stations and restricted the growth of economically smaller groups to the smaller markets. While, over a period of time, the top 50 rule would have increased the number of separate organizations competing, that number is — and will remain — sufficiently large to ensure vigorous competition. Moreover, the proposed rule does not affect whatever pattern of dominance one may wish to associate with a "Big 4" or "Big 8," or any other indicia of the relative size of numbers of companies to the total market. Whether economic discrimination favoring groups exists or not is a factual question concerning business conduct; and even if its existence could be proven, the rule would be a clumsy, indirect and uncertain way of dealing with it.

PART THREE

FORM OF OWNERSHIP AND INFLUENCE OVER PUBLIC OPINION

6

Restraints on Molding of Opinion

A KEY POLICY objective of the FCC is to prevent broadcasters from exercising undue influence over public opinion. Limitations on television station ownership do, in fact, restrict the potential size of the national audience which any *nonnetwork* owner can reach. It should be noted, however, that multiple ownership limitations, as differentiated from the duopoly rule, do not lead to an increased number of voices in the *local* forum. To the extent that other factors — the general structure of the broadcasting industry, the economic conditions which prevail, and the sociological and psychological environmental factors influencing it — tend to restrain a potential manipulator of public opinion, multiple ownership limitations are less important as preventatives of manipulation.

It should be noted that our concern here is not with "thought control," a phrase often loosely applied and uncharacteristic of a democratic society. Thought control, as the phrase is usually employed by social scientists, has a very specific meaning generally associated with totalitarian societies. It implies the capacity of a government to bend a people to its will by complete — or virtually complete — domination of all external avenues of communication to the public. As it was practiced in pre-World War II Japan, in Hitler's Germany, and in Stalin's Russia, thought control constituted exercising centralized control of the mass media, the educational system and face-to-face group contacts. In short, thought control means total — or nearly total — control of all major instruments of social conditioning.

Opinion can be, and is, manipulated in a democracy. Manipulation efforts are, for example, routinely attempted by candidates for public office during political campaigns. But those who seek to practice such manipulation are competing in the marketplace of ideas in a free society where the public has access to a variety of objective informational sources. Further, in a democracy, there are checks operating against manipulation by both governmental and private agencies. In the interest of clarity, opinion manipulation may be specifically defined as the use of, or effort to use, information to influence a public to accept the manipulator's point of view. During the manipulation process, the facts may be colored, slanted, omitted, distorted or completely falsified. In short, there are different degrees and forms of manipulation. However, there are three prerequisites for all degrees and forms of manipulation: (a) the manipulator must be seeking a specific end consistent with his self-interest; (b) the use of information is such as to condition the public to accept his ends; and (c) the facts employed are arranged, selected or distorted with a view to achieving the manipulator's effect. By this definition, the advancing of editorial positions by any medium is not viewed as an attempt to manipulate. Editorials are labeled as opinion and are generally published in order to inform the public. Editorials comment on — rather than alter — the factual data on which they are based. An editorial failing to meet these standards may well be regarded as a manipulative attempt, however.

What, then, is the nature of public opinion in the American democracy, and how is it formed? Public opinion is complex, fluid, difficult to predict and subject to many and diverse influences. While views differ regarding the number and priority of influences which affect the formation of opinion, and about the relative impact of these influences, there is a general consensus on the overall effect of certain key influences.

The five types of influences which are usually cited include: (1) internal psychological forces; (2) primary group influences; (3) reference groups; (4) the overall socioeconomic and cultural environment; and (5) the mass media.

The internal psychological forces operating on the individual as he formulates an attitude in any area include his ego, his personality stresses, his mental capacities, his goals and his value patterns. Primary group influences include the family, church, school, place of employment and leaders in these various settings. Reference groups — which include political parties, labor, business and farm organizations as well as civic associations of various types — have a lesser long-run impact, although their influence should not be underestimated.

Environmental conditions, particularly those which represent long-term changes, have the capacity to affect individual and mass opinion drastically. For example, the massive depression which struck the country in the early 1930's produced sweeping changes in the general environment and these, in turn, drastically revised public opinion. In so doing, the depression effect overrode some very strong pre-existing primary and reference group influences.

The mass media represent a significant influence, although individuals disagree on the magnitude of this influence and on the nature of its long-run implications. There is something approaching a consensus, however, about the general way in which media influence makes itself felt. A medium, devoid of content, can be viewed as a neutral vehicle or tool. The nature of what is communicated, the nature of the communicator and the nature of the audience determine the effect of a medium on opinion. Newspapers, radio and television do not have precisely the same impact on their respective audiences, and none of them can affect all of those they reach in precisely the same way. Television probably has a greater capacity for engaging the total audience attention and for creating a sense of immediate involvement than does radio or the printed page. On the other hand, radio has the advantage of giving the audience more scope for use of its imagination, and for permitting absorption of the message while the listener is engaged in other pursuits. The newspaper continues to be a primary information source for the majority of Americans — a habit in most American homes and a superior means for fostering retention of message if only because what is written may be reread at leisure. Moreover, newspaper coverage of key stories is generally more detailed than is that of the broadcast media.

The concept of "mediation" has been devised to explain how the main forces in the molding of opinion operate. This concept has significant implications for all who seek to influence opinion. Mediation is a complex process by which the individual screens the information reaching him before evolving his own particular view of it. Consciously or subconsciously, the individual is selective in his perception and retention of information. Furthermore, any communication which penetrates the barriers or screens set up by the individual may or may not move him to action. That is, he may willingly expose himself to a given publication or medium, receive the essence of its message, retain it in the foreground of his memory, but not act on it. And the effects of a given message may be nullified by a "neutralization" process which operates when the individual remains on dead-center because he is subjected to cross-pressures of relatively equal intensity.

Clearly, then, the specific effects of a given medium on public attitudes at a specified time are difficult to measure with precision and even more difficult to anticipate. This is the case regardless of the type of medium or the nature of its ownership or control. Precise measurement may be relatively easy in a laboratory environment, but opinion measurement tools now available are relatively simple in nature and it is unlikely that they are capable of truly *precise* measurement of the effects of a specific medium on a specific attitude in a real situation. This is not to suggest that polls and related market research tools are incapable of measuring more general reactions and responses to an issue, candidate or product.

Through analysis of prevailing television market conditions, economic and financial data available from the Federal Communications Commission and broadcasting industry, as well as organizational material provided by individual stations and groups, it was possible logically to arrive at some generalizations concerning the restraints imposed on any television station —assuming that it sought to manipulate opinion in a competitive environment. It was also possible to relate these generalizations to others, sociological and psychological in nature. The three types of restraints thus isolated are classified as structural, economic and environmental.

A *structural* restraint or limitation on the capacity to manipulate is one implicit in the nature of the television industry's organization, in the structure of the community market, the nature of station administration, the diversity of audiences served and in the relationships between stations and their network affiliations. In short, the term "structure" pertains to both the anatomy of television broadcasting and to the operating conditions imposed on it.

A competitive situation prevails in each of the 50 major cities. That is, two or more stations are today operating in each of these markets, which collectively contain an overwhelming majority of the American people. In effect, this means that a potential manipulator in any and all of these markets must compete with at least one, and, in more than 90% of the cases, with two or more other stations. In addition, he must compete with other media in the area of news and editorials. This state of affairs militates strongly against any overt distortions of fact, "slanting" of information or other practices generally associated with the concept of manipulation. In a truly competitive environment, such as that which exists in these major population centers, attempts at manipulation in connection with any significant issue are hardly likely to pass unnoticed, if only because of the existence of competing channels of information.

The dependence of television stations and of broadcasting in general on network news and wire services for much of their news programming content represents another structural limitation. Here, however, it should be pointed out that television stations' news and public affairs departments are so organized and oriented as to require them to be substantially dependent in the gathering of news on sources outside of station control. While it is possible for any mass medium to shade or slant some stories obtained from reliable outside sources, the fact that such sources are independent of the local medium represents a major limitation on the latter's potential for manipulation. And this limitation is magnified in effect by the existence of competition which has access to the same outside national news sources.

Any station in a competitive market must appeal to a diverse audience —diverse in terms of tastes, needs and orientation. This represents a significant structural limitation in that it requires a station to tailor its programming to a broad spectrum. Failure to meet the needs of this diverse audience would result in a loss of some portion of it, with a resulting loss of income and status. Overt propaganda efforts or persistence in an obvious propaganda line could not help but irritate — and perhaps alienate — large segments of the audience, particularly where alternative channels of information are available.

The fact that group stations are very substantially dependent on "name" network broadcasters for prime time national news coverage represents another structural restraining factor. With one exception, groups have affiliations with more than one network. Thus, on a typical evening, a given group might be carrying the Huntley-Brinkley (NBC) news program in one market and that of Walter Cronkite (CBS) in another. A group which sought to manipulate the news in connection with any significant national issue would thus have to compete with nationally-known broadcasters reputed for integrity and competence. Patent discrepancies would shortly become obvious to the substantial audiences who view these "name" newscasters through group-owned channels.

In addition to structural restraints on manipulation by a television station within the confines of a single community, there are restraints which relate specifically to the potential group manipulator seeking to manipulate in all or most of the communities in which the group operates. This assumption is improbable on the face of it, but nonetheless bears examination. In the top 50 markets, with few exceptions, each group owner[1] currently competes with different group owners in each market he serves. A group owner who wished to get around the competitive check implicit in each market in order to manipulate opinion would have to make some sort of collusive agreement with all or most of the other owners in each market. This would mean agreements with a large number of competitors. The arrangement of such a web of collusion is highly improbable, as is the ability to keep such collusion a secret.

Although related to structural restraints, the *economic* restraints have distinct and separate characteristics, and involve such factors as: economic competition in the market served; the need to make a profit; and programming time availability as it relates to costs. It seems most unlikely that any station would run the risk of prejudicing its economic position by engaging in manipulative efforts in the face of conditions which would serve to expose their efforts.

The following quotation is taken from the policy manual of a group-owner television broadcaster. It not only reflects that group's basic rationale for being in the broadcasting business, but underscores the fundamental economic restraint on the would-be manipulator.

> Our first order of business at all times is to generate a substantial return on capital. By the fact of their investment alone, the stock-

[1]See special definition in Exhibit 6, p. 45.

> holders are entitled to the corporate staff's making a strenuous and continual effort toward this end. Whether, or the degree to which, any particular shareholder may be said to need such return is as irrelevant as whether RCA needs the purchase price of a piece of equipment which we buy and for which we agree to pay. The obligation must be honored if the system is to work.
>
> Only with financial strength can our programming enjoy the privilege of independence from outside pressures; only with it can we take our course directed by our own principles, undeflected by other people's carrots and sticks. Those mass communications organs which delegate their product selection to outsiders for a price are mainly the financially weak.
>
> Finally, profits must be made for the Company to stay in business. As breathing is to life, making a profit may not be the main purpose but it is an essential condition to every other worthwhile corporate purpose.

It would appear that a basic aim of every television station in the commercial field — be it group-owned or singly-owned — is to make a profit. This is, in effect, the aim of private business generally — even of enterprises clothed with a public interest. And, as the above-cited quotation indicates, a broadcaster can meet his other considerable obligations to the community only if he makes enough money to stay in business. It is very unlikely that any station owner would run the risk of prejudicing his profit margin by engaging in efforts to manipulate opinion which could conceivably endanger the station's status as a money maker. Overt manipulation which serves to alienate key segments of the community cannot help but harm a station's economic position in a competitive environment.

This is not to suggest that economic requirements make some types of manipulation impossible. It is conceivable that a well-financed potential manipulator might not be concerned with taking a loss. However, a deliberate policy of manipulating political information in a competitive situation strikes at the economic situation of the manipulator by reducing the level of his community rapport, and, consequently, building up that of his competitor or competitors.

Moreover, in the news and public affairs areas — those in which manipulation would most logically take place — the potential propagandist is impeded by the substantial cost involved in pre-empting time which might otherwise be earning a return. The revenue loss would be particularly great in pre-emption of a prime time segment generally devoted to high-yield entertainment programming. Yet, for the purposes of manipulation, prime time is generally the most desirable period in which to reach the largest audience and thus achieve an optimum effect.

Since stations owned by out-of-town group corporations are likely to have fewer local "sacred cows," they are less likely to soft-pedal the handling of controversial local news and issues than are many single-owner stations. That is, group-owned stations are less likely to have other local investments and business interests than are single-owner stations, which often get their initial financing from other business or industry outside the broadcasting arena.

This is not to suggest that single-owner stations are, or would like to be, manipulators of the news. The point is that group-owned stations are less likely to be exposed to the pressures which might conceivably affect the handling of news and editorials with a bearing on local business interests than are single-owner stations.

Environmental restraints are essentially psychological and sociological in nature in contrast to structural restraints which relate to the organization and operating structure of the television operator. They include such things as the need to maintain credibility, the effect of nonmedia sources of influence and information, and the need to conform to community needs and aspirations.

Any communicator seeking to manipulate individual or mass opinion is limited by internal psychological, broad environmental and group-association forces over which he has little or no control. The prevailing view among researchers is that nonmedia forces are more significant in the molding of individual opinion than are those of media. Most researchers agree that it is exceedingly difficult for any medium to change a large segment of audience opinion if such a conversion requires a significant departure from established norms. Individuals and groups are not easily moved to execute a given act proposed by any medium even when they admit that they have been positively influenced by the message. The more difficult and complex the action required, the less likely the audience is to act.

Competing media represent a form of counterpressure which the potential manipulator must take into consideration. Such competing sources of information exist even in communities in which there is a true monopoly of the *local* media. The degree of influence on any given issue will vary with the medium source and with the manner in which the target audience is exposed to that source. A television station portraying a given event in a specific way may have an impact on the community which counteracts or nullifies the presentation of the same event in another medium. Not only do the different mass media — radio, television and the press — have differing effects on public opinion, but specialized media (farmer's journals, labor organization publications, etc.) have often been found to be more influential with certain groups of people than are any of the mass media. When an audience is bombarded by conflicting treatments of a given issue by two different media, it is generally true that the audience will be influenced most by the medium whose approach is most consistent with its preconceived notions on the issue.

The larger and more complex the structure of an organization, the more likely is it that bureaucracy will limit the capacity of the policymaker to fully control the activities of others who make up the organization. The implementation of a policy affecting the content and nature of the informational dissemination process (news and public affairs) is exposed to a number of personal and organizational screening forces. These are likely to have a greater inhibiting influence in larger organizations, although such influences exist in all organizations to some degree. The "gatekeeper" theory operates in all media. Its basic premise is that various individuals located at strategic points in the reporting and editing process serve as "gatekeepers" in determining what shall be published (or aired) and how it shall be handled. The "news" judgment process to which the theory pertains involves a variety of influences not readily susceptible to control by policy directive. That process will vary with time, personalities and circumstances.

Community needs, pressures and aspirations represent an important limiting influence on any medium though the nature of that influence may vary when media competition is lacking. The normal bent of the medium is to move with the status quo as its directors perceive it; no medium is free of the biases, economic pressures and political orientations of the community in which it is located. Research to date supports the general observation that the media have not sought to influence opinion in a way counter to the established attitudes and aspirations of the public. This holds true both for the nation as a whole and for the community setting in general.

The general effect of the mass media under normal operating conditions is to reinforce *existing* tastes, attitudes and beliefs. Conversion of opinion generally occurs only among a minority of the audience exposed to a concentrated *short-term* attempt by the media aiming at conversion on a particular issue.

In general, the manipulator can hope to achieve his aims only if they are presented in a manner consistent with the target audience's existing value system. However, it is important to note that: (a) conversion of even a small minority of voters can be the difference between victory and defeat in a close election; (b) the media can have a significant capacity for molding opinion with respect to issues which are new and on which attitudes have not hardened; and (c) there is no research evidence as to the *long-term* (years, decades) influence of media in the political arena.

Credibility — which relates both to the status and reputation of the source and the content of the message — is of major importance in determining the effectiveness with which a communication from any medium can influence a target audience. The potential manipulator has to be constantly concerned with credibility, since its loss or substantial diminution would obviously defeat his ends. It follows that communicators able to achieve a high level of credibility with their audiences are also most likely to achieve their objectives. A medium is unlikely to achieve or maintain credibility in a community if it operates in a manner which is inconsistent with the standards and aspirations of the community.

Prediction of audience response to a specified propaganda appeal is always difficult and often impossible. This means that though a potential manipulator may have the will to influence people, he might not have the ability to do so. Such prediction includes complex variables far more difficult to identify and deal with than those confronting the market researcher measuring audience reaction to a given product or advertisement. Furthermore, it is not always possible to estimate audience response to a proposed message by an advance "test run" on a limited sample because significant changes in the climate of opinion may occur on short notice, especially when the issue is political in nature. Predictions of the political effects of propaganda appeals in a democracy are limited by: (a) competing media sources of information; (b) lack of totalitarian control — in the community, educational and vocational settings; and (c) lack of any means for certain assessment or control of the host of mediating influences generated by individual psychology, primary groups and broad environmental forces.

To summarize the major points presented here:

1. The barriers to a group-owned station effectively practicing opinion manipulation in the top 50 markets are virtually identical with those confronting the single-owner station. They are so many and diverse as to make the prospect of successful manipulation by any type of owner exceedingly remote.

2. The economic competition which groups confront in the 50 major markets makes the risk by any station seeking to engage in manipulation so great as to seriously inhibit the desire to take the risk. The general economic requirements implicit in a television station's operation are such as to make any substantial loss of audience to a competitor a prelude to certain loss of revenue and income.

3. The structure of the television industry — particularly in the news and public affairs areas — makes the individual station greatly dependent upon sources beyond its control for the information it disseminates and for the audience attention upon which its survival ultimately depends. Successful opinion manipulation generally requires a monopoly or near monopoly of both informational sources and target audience attention. Group stations in the major markets have no such monopoly.

4. The psychological and sociological influences operating upon media audiences, upon the media themselves, and upon the community in a competitive environment severely limit the capacity of any one medium to manipulate opinion. This limitation applies to television stations even as it

does to newspapers, periodicals and radio. Among these limiting influences — here partially defined as environmental — are the need to maintain credibility, the difficulty of predicting with precision how an audience will react to a specific type of manipulative maneuver, and built-in limitations on the capacity of any medium to convert existing attitudes.

In conclusion, *a priori* analysis indicates that a group owner would face severe difficulties in any serious attempt to manipulate public opinion. Let us now examine the practices of the industry to see whether there is any factual evidence to indicate that group owners have attempted to manipulate public opinion despite the difficulties which exist.

7

Practices of Group Stations in the Area of Opinion Molding

A FIELD SURVEY was conducted in order to determine the practices in various areas — including that of opinion molding — of both group-owned and single-owner television stations. This consisted of: (a) mailing comprehensive questionnaires to every commercial television station in the country;[1] and (b) conducting 35 in-depth interviews with a representative cross-section of station managements, a majority of which had not answered the questionnaire. The questionnaire forms distributed to the group-owned and single-owner stations were very similar in format and content.[2] Both forms probed for considerable data relating directly to the role of the respondent in the news, public affairs and editorial areas.

The field survey focused on information in two basic areas: a) the manner in which individual stations — group or single — arrive at their news and public affairs programming policies, and the factors which determine the way news is processed on a day-to-day basis; and (b) the manner in which editorial policies are determined within the station, with specific emphasis on the function of group-owned stations in airing editorial opinions. The news and public affairs programming policies will be discussed in this chapter and the determination of editorial policy, in the following chapter.

In order to determine the performance of stations in the areas of news and public affairs, those aspects of station operation and organization bearing directly or indirectly on these areas were examined in some detail. It was concluded that group headquarters did not seek to control the specific choice and processing of news by member stations. News policy and

[1]Eighty-one questionnaires out of a mailing of 532, or 15.2%, were returned.
[2]The forms are reproduced in Appendix D.

related decisions were generally made within the individual station. The autonomy enjoyed by individual stations in the handling of news programming was the result of deliberate group headquarters policy, the influence of the community and the nature of news reporting and editing.

Some group headquarters discussed general news policy with member stations on a regular or occasional basis. However, the substance of such discussions concerned the best way to meet the needs of the individual community — not the specific news items to carry or how to present them. Some groups maintained an "exchange" service in the sense that the individual stations comprising the group exchanged copies of editorials and key local news stories, but there was no attempt to force use of this material on the stations.

In short, the individual station set its own news and public affairs programming policies, and the news director (or person performing a similar function) was directly responsible for both the selection and processing of the items which made up the station's news programs. Further, the individual stations participating in the field study unanimously reported that they were primarily responsible for the development of their own public affairs programs, and that these were generally locally-oriented. It should be noted that group *headquarters* produced very few public affairs programs of any kind.

Ultimate responsibility for program policy in the news and public affairs areas rested with the station manager who, in turn, generally delegated this responsibility to a news director or other supervisor who directs news coverage. This included such matters as choice of items to be broadcast, coordination of the news staff and maintenance of performance standards. Group headquarters is not unconcerned with the general responses member stations get from their communities in regard to their news and public affairs programming, but they did not attempt to dictate the content of that programming or to supervise the actual gathering and processing of the news. Even in those relatively few cases where group headquarters lay down very general policy lines as to the approach to news and public affairs, the general responsibility for administration of the pertinent programming remained that of the manager of the individual station. The great majority of group headquarters had no set formal policies relating to news and public affairs programming by member stations.

One group's policy manual contains material relating directly to the news and public affairs area and illustrates the point that — even in cases where group policy is laid down in formal fashion — the individual stations are given maximum latitude and flexibility in implementing the policy. In a section entitled "Public Affairs," the company states that "... our primary duty in the field of public affairs is to assist people to acquire an understanding of them — by dispensing information, interpreting it and giving a rational analysis of it from a variety of viewpoints, not more than one of which may be our own. . . ." In a section entitled "Integrity of News Programming," the manual states that commercial interests and related pressures must not be allowed to influence the presentation of news. It holds that the voice or face of a person engaged in news broadcasting may not be used to "push" or sell a commercial product and ". . . no consideration shall be solicited or accepted for any material of any kind which is part of a news program or any other program produced by a news department."

This same concern with the integrity of news programming — in the sense of keeping it free of commercial, political and related pressures — is expressed in a manual prepared by another group. In a general policy memorandum which is part of the manual, the management calls attention to the fact that some staff members have sought the intervention of the news staff ". . . .regarding assistance with city, county and state officials." In its desire to protect both the integrity of the news department and of the station generally, management stated flatly that ". . . under no circumstances is any individual of [the station] to intervene in any way in behalf of persons in or out of this company in relations with officials of our city, county or state government."

News and/or public affairs directors in the majority of group-owned and single-owner stations have considerable freedom in the running of their departments and in the selecting and handling of news items for broadcast. This freedom, in turn, serves to limit the capacity of group headquarters to influence the flow of news if, indeed, it desired to do so.

One group, which exercises a greater degree of formal supervision of its member stations than most of the other groups whose stations participated in the field survey, nevertheless laid down a policy which gives its news directors great latitude. This is so despite the fact that the news director is subordinate to the program director of the parent station. Thus, the news director's general responsibility is defined as to ". . . conceive, develop, execute and coordinate news, documentary, news special, sports news and other related programs." The manual specifically states that the news director ". . . makes final decisions . . . on selection of news assignments and items" and on ". . . overall coverage of news events, including specific story assignments and method of handling and editing of film."

News directors, like editors on daily newspapers, are sensitive to management's feelings in the policy sphere. "Sacred cows" beset all media to some degree. Furthermore, some television stations, like some newspapers, are more rigid in their requirements for the handling of news than others. But, as the field survey results indicate, news directors did have considerable latitude in their jobs. The following comments, which are paraphrased from notes taken by interviewers during the field survey, support the basic assertion. All comments are taken from interviews with officials of group-owned stations.

News Director, California: The group does not have a corporate news director. It is the station manager's policy to allow the news director to decide what is and what is not news. He says he would resign if his station were not permitted (by group headquarters) to develop its own news format. On the basis of his experience in newspapers and other media, he believes that there is more freedom of expression in TV than in any other medium.

General Manager, Tennessee: The group headquarters does not maintain a separate corporate news department, dictate content of news broadcasts, nor interfere with programming. However, group headquarters had insisted that the station update the equipment in its news department and substantially increase its news staff.

Executive Vice President, South Carolina: The station has resisted local pressure to take a news program ("Monitor") off the air because it was sponsored by an international union opposed by local unions. It also refused to carry a right wing commentator despite considerable pressure brought to bear on management. The Executive Vice President never confers with the program director (who is responsible for news programming) concerning the handling of specific news items, although he sometimes provides leads for informational purposes. The following are his only standing instructions to program and news directors: be fair, and run the most important news first.

Station Manager, Minnesota: While it is theoretically possible for group headquarters to issue directives concerning editorial policy or slanting of news, this has never occurred, and there is no reason to believe that it would occur. Even if it should, one station would not be able to exert a meaningful influence on public opinion in an area where there are four other television stations, several radio stations and newspapers. In this kind of competitive market, it is impossible for a single TV station, regardless of the strength of its position, to dominate public opinion.

Program Director, Washington: This station swaps major news stories with a station in another state belonging to the same group, and the two stations provide reciprocal coverage of their respective areas. However, the news departments are completely separate and independent, and seek to project different images in their respective markets. There are no corporate policies regarding news or the production of documentaries. Group headquarters does not seek to dictate policy in news handling. However, the two stations sometimes exchange "expertise" through seminars led by key personnel, one of which dealt with the shooting of news film and the per-hour costs of running equipment.

Station Manager, District of Columbia: This station maintains constant personal communication in the news area with the management of the paper which owns it. However, the parent paper does not dictate news policy. Advertisers of the newspaper have tried to influence station news policy, but these pressures have been rebuffed. The station's news operation functions independently of the newspaper's, despite the liaison by the staffs involved.

In only two cases did the survey research team come into contact with situations in which it appeared that a parent organization maintained more than nominal supervision of a member station's news policies although, even here, there was no evidence that headquarters selected specific news items, or that either headquarters or the local station were engaging in the manipulation or "slanting" of the news. In one case, an official of the newspaper corporation which owned the station was a member of the station's editorial board. In the second case, group headquarters appeared to monitor the local station's operations to a greater degree than is customary.

The Taft Broadcasting Company, which operates television and radio stations, conducted an analysis of both the news and editorial outputs of all its stations in the fall of 1965. The news program analysis is considered here briefly because of its pertinence. Group headquarters selected a date at random (September 29, 1965) and asked all member stations to submit their major news program scripts for that day for analysis. Since the request was made in October, it did not bias individual station handling of the news on the date selected for review.

In general, the analysis found that every station differed substantially from every other in the way it "played" the news, in the handling of national wire-service stories, in the "mix" of national and local news, and in the precise handling of specific stories. Most of the stations began their news programs with local stories, but several began with national items. The number of stories handled by the respective programs ranged from a high of 23 to a low of five, a range explained, in part, by the variation in the amount of time devoted to the news programs — from 10 minutes to 25 minutes. The mix of local and national stories varied substantially from station to station and from television to radio. The average for the Taft TV stations was 56% of local news and 44% of national news. The comparable percentages for the radio stations were 58% and 42%, respectively. This emphasis on local news — which will be discussed in detail below — is typical of broadcasting in general and of the stations surveyed in particular.

The analysis makes it clear that the Taft group headquarters does not "control" the news operation of any of its stations, nor does it seek to exercise such control.

Perhaps more significant in terms of the general problem to which this segment of the report is directed are the factors implicit in the news processing system which make it all but impossible for any group to exercise airtight control of its member stations without destroying the effectiveness of such stations as purveyors of news. These factors, which relate to diverse news sources and local conditions as well as other limitations imposed by the community, will now be examined.

The Taft group survey indicated that each station depended upon a variety of sources for its news and that the relative importance of those sources varied. From the analysis of the responses to the questionnaire, it was found that this was generally true of all television stations participating in the field survey. Respondents were asked to rate the degree of their dependence upon each of 10 specified news sources as well as any other source which they wished to mention. The respondents were provided with a six-level rating scale, running from "very great" to "very little" and "none." Exhibit 19 reveals no significant differences between group-owned and single-owner stations in terms of their level of dependence on any one

Exhibit 19

DEGREE OF TELEVISION STATION DEPENDENCE
ON SOURCES OF NEWS

	Dependence Ratings[a/]	
	Group-Owned Stations	Single-Owner Stations
Station Reporting Staff	4.9	4.8
National Wire Services	4.0	3.7
Network News Organizations	3.1	3.4
Local or State Government Press Releases	2.3	2.5
Local Private Groups' Releases	2.2	2.8
Local News Services or Bureaus	1.9	2.0
National Government Press Releases	1.7	1.9
National Private Groups' Releases	1.4	1.9
Group News Organizations	1.4	-
Staff of Affiliated Newspapers	0.2	0.4

a/ The ratings are averages based upon the following scoring system: very great = 5; great = 4; moderate = 3; little = 2; very little = 1; none = 0.

news source. Equally significant, however, is the fact that the stations showed very little dependence on group news organizations, on the releases of local and national interest groups, and on affiliated newspapers. These are the sources most likely to be in a position to exercise a measure of control of the news dissemination process, assuming that they wished to do so. The media are, of course, better able to withstand pressures from interest groups for news space or time than to resist demands that might be made by newspaper or group owners.

On the other hand, the stations revealed "very great" dependence on their own news reporting staff, "great" dependence on the national wire services, and a "moderate" degree of dependence on network news organizations. In short, two of the three general sources on which the stations were substantially dependent (wire services and network news) lay completely outside their control; the third — their own news reporters and editors — was within their individual orbits of operation.

In summary, then, the diversity of news sources upon which television stations rely and the relatively great dependence on sources outside station control or that of group headquarters (where applicable) point up the difficulty any local station would have in manipulating the general flow of news. The limited effect of group headquarters and newspaper-owned sources on the news collection process within stations suggests a high degree of individual station freedom and initiative, as does the considerable dependence on station staff. Finally, the great similarity in patterns of source dependence between group-owned and single-owner stations indicates that groupness *per se* had very little effect on the way a station operates in the process of collecting and disseminating the news.

Television stations, whether group-owned or singly-owned, on the average devoted 10% of total broadcast time to news programming and an additional 6% or 7% to public affairs programs (such as panel interviews, issue discussions, special civic affairs coverage and documentaries in general). The survey also reveals that the group-owned stations emphasized local affairs somewhat more than single-owner stations, 59% and 50%, respectively.

Two conclusions may be drawn from these figures. First, the stations' relative concern with local affairs generally indicates both sensitivity to local needs and pressures as well as a major limitation on the *capacity* to manipulate. The issues in regard to which manipulation represents the greatest danger to the public well-being are generally national in scope — that is, they relate to policies and legislative proposals likely to affect the basic fabric of American life. The emphasis of television stations on local affairs, coupled with their dependence on diverse news sources, supports the assumption that the area of manipulation open to them (assuming they wished to use it) is small. The second conclusion is that group-owned stations are even more limited in this respect than those which are singly-owned. In devoting more of their total news broadcast time to local matters, they have further reduced the area available for manipulation.

A further limiting factor on the potential ability of individual stations to manipulate opinion is their reliance on independent producers and the networks for programming. Because these play a major role in filling the program needs of commercial television stations, they thus determine the the nature, quality and content of the total program "package" to which the community is exposed.

Television stations produce a relatively small proportion of their own programs, and such programs as they may produce themselves customarily do not pre-empt prime time periods (which are dominated by network produced programs). In terms of total broadcast time, both group and single-owner stations are heavily dependent upon the networks and independent producers.

The questionnaires show that in 1965 networks accounted, on the average, for 49% of total broadcast time for group-owned stations and 53% for the single-owner stations surveyed, a difference which cannot be termed significant. More noteworthy, however, is the fact that for group-owned stations 30% of total broadcast time was supplied by independent producers; in contrast, the comparable figure for singly-owned stations was only 14%. Group headquarters-produced programs filled only 1% of total broadcast time. Group and single-owner stations had similar amounts of in-station production, 16% and 17%, respectively. When these figures are related to the average amount of broadcast time devoted to news (10% of the total) and to public affairs (6-7%), it is clear that the amount of time available to either group or single-owner stations for manipulation is very limited indeed.

Network and independent producers represent a major source of influence on community audiences independent of the ownership of the stations through which their programs flow — primarily because of the extent to which they dominate the total program package. Since the stations have relatively limited control of the total package, they must demonstrate more care, perception and efficiency in utilizing the program time they do control to meet the needs of the community they are licensed to serve.

In conclusion, a television station operating in a competitive environment, no matter what the nature of its ownership, confronts circumstances which make successful manipulation of opinion exceedingly difficult and hazardous for the potential manipulator. The available research evidence supports the general position that there is nothing in the nature or form of ownership which distinguishes stations insofar as capacity, desire or effort to influence public opinion are concerned. Group headquarters does not seek to control the specific choice and processing of news by member stations. News policy and related decisions are generally made within the individual station. The freedom given individual stations by group headquarters in the handling of news programming is the product of deliberate policy, the influence of the local community, and the nature of news reporting and editing.

8

Practices of Group Stations in Editorializing

THE TAKING OF editorial positions by broadcasting stations is consistent with FCC policy and the public interest. Though the bona fide editorial, labeled as such and commenting on rather than stating factual data, cannot in itself be considered manipulative, the editorial channel can be used for manipulation and undoubtedly has been so used upon occasion by the mass media.

Groups and individual stations differ on whether a station should editorialize at all. Among those that do so, there are differences in editorial philosophies and in their general approaches to commenting on issues.

Bearing in mind the complexity of the television industry and the diversity which characterizes its organization and function, it may nevertheless be stated that television stations generally do not engage in manipulation via the editorial channel. Furthermore, groups, in particular, are not manipulation-oriented and the existing legal, administrative, economic and sociological checks on manipulation are such as to make overt attempts via editorials exceedingly hazardous for the potential manipulator.

Intensive field research, combined with an assessment of the data derived from that research, indicates that group headquarters had a relatively limited effect on the molding of editorial policy in their member stations. Group-owned stations in the survey showed a larger proportion carrying editorials (63%) than was the case for the single-owner stations (38%).[1] In most — but not all — of the cases in which a decision was made against editorializing on policy grounds, that decision was made by headquarters.

[1]A recent study by the TV Bureau showed that 41% of all stations did not broadcast editorials.

For the about 35-40% of the group-owned stations in the country that do not broadcast editorials, then, editorializing is a closed route insofar as potential manipulation is concerned.

The concern here is with the specific manner in which those groups which do editorialize carry out the function and with the evidence that, with very few exceptions, group headquarters have a very limited effect on specific editorial positions taken by member stations. Of the two exceptions encountered in the survey, one was an Eastern station owned by a newspaper and the other a Southern station in which headquarters shared the same premises as the station under interview. In neither case, however, was there any evidence that the editorial channel was being used for manipulative purposes, and in both cases editorial comment generally emphasized local issues.

Questionnaire respondents were asked to rate the degree of influence which various individuals and organizations had on the "station's editorial position." They were provided with nine alternatives plus an opportunity to write in any "other" influences that might come to mind.

Exhibit 20 presents the average ratings for group-owned and single-owner stations of possible sources of influence on editorial positions. With a few significant exceptions, group-owned stations and those singly-owned showed similar patterns of influence on editorial policy: that is, that local interest groups and other local media had relatively little influence, that program directors had somewhat more influence, and that news directors and editorial writers were even more influential. However, it is apparent that station managers of both group-owned and single-owner stations have the most influence of all, while group headquarters has very little influence on the molding of editorial policy. In contrast, single-station owners exercised a considerably greater degree of influence on editorial policy than did group owners.

During the field interviews the fact was repeatedly confirmed that station managers of group-owned stations have a high degree of independence. In this context, it should be noted that the majority of field interviews were with stations *not* represented in the questionnaire analysis although a small group of stations was covered both by field interview and questionnaire analysis.

Most group stations formulate editorial policy through a committee discussion system which is consistent with democratic practice and inconsistent with the doctrinaire approach generally associated with opinion manipulation. Such committees may include from three to six (or even more) participants — with the station manager, the news director and the editorial writer (or writers) as part of the group. Often, the program director will participate, and, occasionally, there will be an outside consultant as well as a legal expert.

Exhibit 20

RELATIVE INFLUENCE OF SOURCES ON EDITORIAL POSITIONS

	Influence Ratings[a/]	
	Group-Owned Stations	Single-Owner Stations
Station Manager	4.4	4.1
News Director	3.7	3.1
Editorial Writers	3.2	2.3
Program Director	2.4	2.1
Local Interest Groups	1.3	2.0
Headquarters	1.1	-
Owner	0.9	3.5
Position Taken by Other Media	0.5	0.8
Board of Directors	0.4	1.7

[a/] The ratings are averages based upon the following scoring system: very great = 5; great = 4; moderate = 3; little = 2; very little = 1; none = 0.

The station manager is virtually always a major influence in the molding of editorial policy even if he does not participate in the committee system. In most of the groups which permitted editorializing, the station manager was not required to clear editorials in advance with group headquarters, although, in some cases, copies of editorials were routinely sent to headquarters, after the editorial had been aired.

More precise light is shed on the editorial policy-making process by the following brief statements paraphrased and culled from personal interviews with group station managers and other executives.

> *Station WNEP, Scranton, Pennsylvania:* Editorials are run Monday through Friday, twice a day, each about one and one-half minutes in length. Most are concerned with local, state and regional matters, very few with national issues. Policy is evolved by an editorial board, consisting of the station manager, program director, news editor and a news reporter. The news editor writes the editorial for the manager's approval. Each year, the board sets up 12 "areas of interest" with which the editorials will deal.

> *Station KIRO, Seattle, Washington:* Basic editorial policy is the product of local initiative rather than of group policy and is tailored to the local audience. Editorial positions are decided by

an editorial committee which meets every Tuesday. The committee consists of the TV and radio station managers, legal counsel, the editorial writer and an outside consultant. The editorial writer, a veteran journalist with much newspaper experience, suggests topics and possible approaches, which the committee may approve, disapprove or subject to additional thought and research before reaching a decision. Copies of the editorials are sent to group headquarters after broadcasting.

Station KXTV, Sacramento, California: Station editorial policy is set by an editorial board, consisting of the station manager, news director, editorial writer, promotion manager, sales manager and program manager. Editorials deal with local issues or give local slant to a national issue. They are usually one and one-half minutes in length and are carried after the evening news.

Station WSB, Atlanta, Georgia: The station manager sets policy, but the news director writes the editorials. It is not clear where the initiative comes from in the preparation of editorials, but the station manager says that group headquarters does not influence the editorial process at all. The station owner also owns a newspaper in the community, but the program coordinator stated that the station and newspaper were completely independent of each other in the formulation of editorial policy. Virtually all editorials deal with local issues. There are occasional conflicts between the sales and news departments as to an editorial position, but the station manager said he always decides the issue.

Station WTCN, Minneapolis, Minnesota: The station carries relatively few editorials and these generally deal with local issues. Editorial policy is determined by the station manager and the news director who apparently consult informally. Editorial copy is not approved in advance or reviewed in any way by group headquarters.

Station WTVT, Tampa, Florida: The decision to editorialize was initiated by the station manager, although he had to get group approval to do it. Editorials deal with local, state and national issues. General subjects and positions are developed jointly by the station manager and the news director. A research writer does the actual writing. Editorials run five days a week and are from one and one-half to three minutes in length. Copies are sent to group headquarters after broadcasting.

Station WDSU, New Orleans, Louisiana: Editorial policy is set by a committee composed of the general manager of the station, the parent corporation's president, the parent company's vice president, the news director, the editorial cartoonist and the editorial writer. Upon occasion, the announcer who delivers the editorial texts sits in. Editorials are broadcast five days a week, twice each day. They run from one and one-half to two minutes in length. The station does not hesitate to tackle controversial subjects.

Station WTOP, Washington, D.C.: The station is associated with a local newspaper as well as with an out-of-town station. The newspaper is involved in the making of editorial policy through a person who functions both as a key official of the paper and as president of the station. Editorials are discussed and written by an editorial board which, in addition to the station president, includes the station manager, a legal representative and the news director for both the television and associated radio stations.

The Taft group adheres to a general policy which encourages editorials. On November 4, 1965, headquarters asked the managers of television and radio stations in the group to submit copies of all editorials carried on the same date (September 29) previously selected for the news analysis. Analysis of these editorials revealed the following findings:

1. Nine editorial scripts were forwarded to headquarters. Seven of the nine dealt with topics of local or state interest though one of the seven had some national implications.

2. Six of the editorials were actually run on the 29th in Kansas City (WDAF); Columbus (WTVN); Cincinnati (WKRC); Wilkes-Barre (WNEP); Birmingham (WBRC); and Lexington, Kentucky (WKYT). Of these, four were run on both the television and radio outlets in the respective cities. One of the four — that in Cincinnati — was actually a rebuttal to a WKRC editorial by a spokesman for the Louisville and Nashville Railroad who took issue with an editorial aired by the station on September 2.

3. Three editorials were run on September 28 and 30 and on October 26 by the Taft station in Buffalo which apparently had no editorial on September 29. The editorial of October 26 was based upon one run on September 29 by the Birmingham stations.

4. Seven of the nine scripts dealt with completely different issues; six of them were essentially local in character. The seventh had both local and national implications and was concerned with whether police officers should carry guns. The remaining two — run by Birmingham on September 29 and by Buffalo in revised form on October 26 — dealt with a statement made by a psychologist in Alabama to the effect that the nation's moral standards had been in decline for some 30 years.

5. The moral standards editorial was not imposed on any station by headquarters. The Taft stations have an exchange system on editorials and are free to use each other's material. The Buffalo editorial, while based on the same statement, contained some material not run in Birmingham, and the language of the text was substantially revised; its conclusions also differed.

In summary, then, the findings here support the premise that Taft does not dictate editorial policy to its member stations. This is not to suggest that Taft is unconcerned with the manner in which its stations operate in the editorial field. But the case study findings are consistent with the more general conclusion that most groups do not exercise control of member station editorial channels and are, in fact, not inclined in this direction.

The field interviews revealed three groups in which some member stations editorialized and others did not. In these cases, the policy relating to editorializing *per se* had clearly been set by the local stations involved, although it may reasonably be assumed that there had been some discussion with headquarters. The groups are Cox, Royal Street and Chris-Craft. The Cox group's station in Atlanta editorializes, but its Oakland/San Francisco outlet did not. Royal Street's station in New Orleans carried a heavy editorial schedule, while its station in Mobile, Alabama, did not editorialize. Chris-Craft's station in Minneapolis/St. Paul editorialized occasionally, whereas its station in Los Angeles did not.

Stations within the same group sometimes differ editorially on specific issues, although this does not appear to be a common occurrence. Station WNEP (the Taft station in Scranton, Pennsylvania) ran an editorial on the "one-man, one-vote" issue growing out of the Supreme Court decision requiring the states to reapportion their electoral districts, taking a position opposed to that aired by the home station in Cincinnati. Station KSL in Salt Lake City and Station KIRO in Seattle, both owned by the Bonneville International Corporation, have also taken opposing positions, as for example when the stations differed editorially on the need for a Sunday Closing Law for business.

Manipulation of facts in connection with local issues is much more difficult than would be the case with broader, national issues about which the local audience has less specific information. Stations which editorialize generally make it a policy to emphasize state and local affairs as opposed to those national in scope. This conclusion is drawn both from the field interviews and from an assessment of editorial schedules submitted by most of the stations returning questionnaires. The stations were asked to submit data on editorials broadcast during the three-month period, January-March, 1966 — such data to include subject, time (in minutes), source and number of times broadcast.

The fact that the stations which do editorialize concentrated so heavily (an average of 80% or more of total editorial output) on local issues tends to reduce the already limited opportunity for employing the editorial channel for manipulative purposes. The manipulator who seeks to use the editorial channel in regard to local events and issues runs great risk of exposure and backfire. Important segments of his audience are likely to be "on top" of the facts he is seeking to manipulate. And opinion molders, with a vested interest in the issue under discussion, are likely to try to counteract the manipulated opinion either by direct rebuttal or by the release of contradicting information directly to the audience, or both.

Concise analyses of the editorial output of three stations — each representative of different geographic areas of the country — which typify the approach of group stations in the selection of items for editorialization are presented here.

> *Station WOW, Omaha, Nebraska:* During the January-March survey period the station broadcast 17 editorials which averaged two to three minutes in length. Each was aired three times a week and all were written by local staff members. Fourteen of the 17 dealt exclusively or primarily with local matters, including approval of the appointment of a labor union executive to a local university board of regents, the rising stature of the University of Omaha, the need to provide more protection at railroad crossings in the state, and support for an antipornography drive led by a judge.
>
> Of the three editorials not concerned specifically with local or state matters, one was a salute to the Strategic Air Command and to its role in national defense, another dealt with a Harvard professor's proposal to incorporate a course in "practice drinking" in the nation's schools, and a third dealt with the controversy over the Pultizer Prize-winning novel, *To Kill a Mockingbird.* However, this last was tied to a local angle, a decision by a Lincoln (Nebraska) school system to take a book off junior high school shelves; the station opposed the decision.
>
> Appeals for support of the Easter Seal and Red Cross drives, while they had national implications, were essentially local in character.
>
> *Station KXTV, Sacramento, California:* The station aired 28 editorials during the survey period. Of these, 20 dealt with such local and state issues as the Watts riots, the governor's race, the June primary, lawlessness and crime, property tax reform and local water pollution.
>
> Those having to do with national or regional matters covered a variety of subjects, most of which had local implications as well.

The subjects included Senator Robert Kennedy's stand on Viet Nam, the New York transit strike, a proposed Federal tax increase and the question of seat belts in public vehicles.

All editorials were prepared by the local station staff. They were run approximately three times in a given week and were generally two minutes in length.

Station WMAL, Washington, D.C.: This station's handling of editorials is particularly interesting because of its location in the nation's capital and its association with a major newspaper. Its editorial output far exceeded the average for the survey stations as a whole; it ran 68 editorials during the survey period.

About 54 of these editorials dealt with local issues,[2] i.e., matters directly concerning Maryland, Virginia and the District of Columbia, all of which are in the station's market area.

The editorials averaged about one minute in length and were all prepared within the station. Those dealing with national or international affairs covered such subjects as professional football, Viet Nam, the proposed four-year term for Congressmen, strip-mining and political conventions. Most of these had some local implications.

In summary, the degree of influence which a group headquarters exercises on the day-to-day editorializing operation varies, but, in general, the individual stations belonging to groups have a great deal of freedom both in setting basic editorial policy and in taking positions on specific issues. Some stations owned by newspapers appear to have somewhat less latitude than those which are not so associated; and some stations do not editorialize because their newspaper owners hold to the philosophy that editorializing is properly a newspaper function. These, however, clearly appear to be in the minority among newspaper-owned stations.

Stations — group-owned and single-owner — emphasize local and state issues in their editorials and this tends to limit their capacity for using the editorial channel for manipulation, assuming, of course, that a station desired to manipulate. By and large, group-owned stations that do editorialize arrive at positions on specific issues through the board or group discussion process. Editorial positions are not imposed from headquarters. In many cases, persons who have nothing whatsoever to do with setting broad general policy for group or station have considerable influence in setting editorial policy; this is particularly true of those who function as editorial writers and news directors.

[2]The figure of 54 is an estimate, based on data furnished by the station (titles, subject matter, dates and length of each editorial) and not on copies of the editorials themselves.

PART FOUR

FORM OF OWNERSHIP AND THE SERVING OF COMMUNITY NEEDS AND INTERESTS

9

Community Orientation

A MAJOR POLICY objective of the Commission is that the public should have the programming which best serves its needs and interests. The guidelines of "community identification" and "diversification of programming service and viewpoints" have been derived from this policy objective. The reason that community identification is important because an owner who is identified with and has knowledge of the community is considered most likely to have a grass roots interest in the program and service needs of his community and to have an ability and willingness to serve as a forum for his community. In order to relate group ownership and single-station ownership to the area of community orientation, three areas will be examined: community relations; local programming; and stability of ownership.

Many television stations are very much aware of the need to function in a leadership capacity in tandem with other community leaders and leadership groups. They equate this function with that of their general responsibilities to the community. In the questionnaire and field survey described earlier, a number of questions were asked about community relations. Both group-owned and single-owner stations appeared to be equally involved in local community affairs and sensitive to community needs.

Some groups have statements in their basic policy manuals which reflect this concern with leadership. One such statement — which presents a widely-shared view that broadcasting must provide an element of leadership as well as be responsive to the needs and wants of the community — was set out by a group with facilities on the West Coast.

> Our approach to our product has two aspects. One is to strike a balance between people's requests and their needs; between giv-

> ing the people what they want or what we think they want and giving them what we think they ought to have . . . in part it is to serve as a teacher, leader and guide, to choose our content on the basis of our own taste and judgment of merit. And in part it is to be obediently responsive to popular tastes.
>
> * * *
>
> In our entertainment we should please and elevate. Our news reports and comments should deserve and acquire the reputation of the truth. People should come to believe whatever of ours they see, hear or read. They should turn to us to receive knowledge from our information and understanding from our interpretation. Our level of honesty and truthfulness should be the highest which our staff can reach. On matters of verifiable fact, it should be absolute, and on matters of judgment it should be that which can be reached by people who have been selected for possessing sound judgment and who exercise it.

If it can be said that the relationship of the television station to the community is a reciprocal one, it can also be said that the community substantially influences the station's programming. The majority of stations make continuous efforts to determine what the community desires and how their programming is being accepted by the community. This effort extends to the news, public affairs and editorial areas. The impact of the community on television programming makes itself felt in at least three different ways. First, there is the effect of the involvement of key station personnel in community affairs and organizations. Second, the community makes itself felt through formal and informal efforts by the stations to measure public attitudes toward their operations. And finally, there is the more direct effect of community response to specific editorials and other types of programming and station requests for such response.

With very few exceptions, there was an almost universal involvement of key station personnel in community affairs and organizations. Such face-to-face association cannot help but have an effect — both conscious and subconscious. That is, the station official not only is in a position to learn the views of key people and groups, he also becomes a part of these groups and, more and more, tends to identify himself with the community at large. The identification process, by its very nature, limits his capacity to set himself apart from the community in his perception of the type of programming the community ought to be receiving.

Some measure of the extent to which key station personnel are inextricably involved in community activities may be determined from questionnaire responses relating to the number of community, professional and social groups to which station managers, program directors, news directors and public affairs directors belong. These are the officials most directly concerned with program content in general and with public affairs and related programs in particular, and they usually have a hand in the molding of editorial policy as well.

Based on the group stations surveyed, station managers belonged to 12 different local organizations on the average — six general community groups (such as a chamber of commerce or a hospital advisory board); three professional associations; and three social. Public affairs directors averaged membership in six community groups, two professional organizations and one social organization — nine in all; program directors belonged to six groups; and news directors averaged membership in seven groups.

For the single-owner stations, the station managers and public affairs directors, once again, led the list: thus, managers belonged to 14 local organizations on the average; the public affairs directors to 10; and program and news directors, to six and five, respectively. Although single-owner station memberships in local organizations averaged slightly higher than those for group-owned stations, the differences were not significant. More significant is that — in both the group-owned and single-owner stations — the officials most directly concerned with station policy in the news, editorial and public affairs areas were all intimately involved in community affairs. Further, the degree of involvement — in terms of position held within the station — was the same for both group-owned and single-owner stations.

Stations have further sources of information about the community, in addition to that derived from the involvement of staff members in community affairs. Virtually all of the survey stations stated that they made some effort, formal or informal, to determine the community's needs and wants in terms of their operations. A majority, moreover, provided details as to more formal methods employed to tap the public pulse. These methods include: the employment of a community advisory committee to advise on programming and related policies; special and regular attitude-measurement polls executed by reliable outside organizations; regularly-broadcast appeals for audience reaction to station policies and programming; and distribution of questionnaires to persons attending specific shows produced in the stations' studios.

The following comments recorded during station interviews provide examples of group-owned and single-owner stations' efforts to determine community wants and needs.

> *Station WLW-T, Cincinnati, Ohio:* In 1965, the management hired a consultant to conduct a research survey on television viewer attitudes toward television in general and WLW-T in particular. This survey is in the process of evaluation, and con-

sideration is being given to provide programming to meet the needs and interests of the viewer as reflected in this research survey.

Station WAGA, Atlanta, Georgia: Each year the station selects a sample of approximately 500 community leaders. These leaders are contacted directly and by mail and are asked to submit what they consider to be the outstanding problems facing the community. They are also asked to suggest methods through which the station can be most helpful in rendering solutions to these problems. WAGA has a television advertising consultant firm which makes an in-depth study of its community to determine program desires and community needs.

Station WRGB, Schenectady, New York: The station has an Advisory Council which meets annually. Surveys are conducted every two to three years. A continuing dialogue with a representative cross-section of the communities served is maintained through staff membership in local organizations and public appearances as speakers and M.C.'s.

Station KLZ, Denver, Colorado: The station conducts special and comprehensive local surveys to elicit from the public their reactions to its programming, with special emphasis on public affairs, news and editorials. Station officials frequently visit communities outside of the metropolitan Denver area, but within the station's viewing and listening area, meeting with a cross-section of representatives from these areas to discuss its programming services.

Station WLW-C, Columbus, Ohio: The station schedules special weeks for emphasis on particular communities outside the home county in order to learn more of the needs and interests of these communities. Conferences with civic and political leaders are held, and surveys are conducted on area needs. Monthly 'area needs and interests' meetings are held to discuss needs and interests which have become apparent to station personnel.

Station KXTV, Sacramento, California: KXTV employs the services of an independent research firm that periodically surveys the community for its needs, wants and acceptability of programming. KXTV feels it has a solid 'grasp' of the Greater Sacramento area.

Station WOR, New York, New York: The station maintains an Audience Service Department which is responsive 24 hours a

> day to mail and telephone inquiries, suggestions and comments from the viewing public with respect to present and future programming. WOR management regularly meets with elected and appointed federal, state and local officials, both to determine communication needs of government at all levels and to develop programming commensurate with these needs.

In addition to general efforts to determine public needs and desires, a large number (but not a majority) of stations surveyed stated that they regularly encourage the public to comment by phone or mail on programming, news presentation and editorials. Many stations provide for the airing of rebuttals to their editorials if issue is taken by a responsible party.

Stations which regularly solicit audience reactions by broadcast appeal (as opposed to polls and other survey devices) demonstrate a sense of responsibility to the community and an awareness that favorable reaction to their programming in a competitive market is essential to their success. Among the stations which make specific broadcast requests for audience suggestions in the news and public affairs areas are: WFRV, Green Bay, Wisconsin; KOGO, San Diego, California; WLW-T, Cincinnati, Ohio; KLZ, Denver, Colorado; and WBRC, Birmingham, Alabama.

Closely related to the on-the-air appeal is a practice adhered to by virtually all stations surveyed, group and single: that of responding rapidly, thoughtfully and courteously to every telephone call and letter of complaint or suggestion received. Several groups have incorporated this policy into their manuals, and a number of stations reported that many program innovations have been the product of careful review of incoming calls and correspondence. Station WGN, Chicago, takes the following position in a policy statement to all management personnel.

> Some broadcasting properties elect to ignore such communications [letters of complaint], but it will be our policy to answer every piece of correspondence. While this practice may be time-consuming, it is even more of a task for the person sending the letter or card to us. In the interest of good public relations with the community we are licensed to serve, we cannot ignore this correspondence.

This general point of view is typical of both the group and single-owner stations surveyed. Like the specific requests for audience comment, the opinion and attitude surveys, and the policy of having key station personnel intimately involved in community activities, it reflects the fact that television stations are greatly influenced by their communities and, further, that they are well aware that their programming must be consistent with audience needs and desires.

Another measure of service to the local community is said to be the amount of local programming presented. While it is arguable whether local programming is always desirable, this is a public policy question and will not be discussed here. The performance of group-owned and single-owner stations in achieving this objective will be compared.

The data for this analysis were obtained from the license renewal forms submitted to the FCC triennially by television station licensees. Information for the period 1962 through 1965 was obtained for 476 stations. While program logs, which are summarized on renewal forms, are used by the Commission staff on a case-by-case basis, it is believed that neither the renewal forms nor the program logs had — at the time of this study — been compiled by the Commission's staff to effect a broad view of broadcasters' policies. The limitations of time and facilities permitted the collection, summarization and analysis of the license renewal data only, which were aggregated for all group and nongroup-owned stations by market group.

The value of this information lies in the light it sheds on the extent of nonnetwork programming rather than on the source of such programming, be it local or other. Since these data specifically exclude programs provided by the group corporation (or by other stations in or out of the group), they are a measure of the policy (and capability) of individual group-owned and nongroup-owned stations to present original — i.e., nonnetwork — programs. This is germane to the more important issue of diversity of program sources and to the potentiality of group ownership to serve as an alternative to the networks in the production of programming.

Exhibit 21 shows that in the top 50 markets nonnetwork programming averaged 13.8% of all programs for group-owned stations and 12.3% for single-owner stations; for all markets, the figures were 11.3% and 10.8%, respectively. While the figures are very slightly higher for group owners, the differences cannot be considered significant. Inasmuch as nonaffiliated stations are more likely to produce their own programs and since group owners in the top 50 markets have more independent stations, to avoid bias, the averages for nonnetwork programming were recomputed for network-affiliated stations and once again it is seen that group owners tended to show slightly higher figures — 12.7% vs. 11.5% in the top 50 markets. Because other sources of nonnetwork programming — independent producers, group corporations and other stations in the groups — were not included in the local "live" programming data requested by the Commission's license renewal form, the data of Exhibit 21 underestimate the full extent of nonnetwork programming.

Another measure by which service to the community might be judged is stability of tenure. The Commission has been concerned with the effects of frequent trading on the licensee's qualifications, experience and intimate knowledge of community needs and interests. The fact that the seller may

Exhibit 21

COMPARISON OF NONNETWORK PROGRAMMING BY TYPE OF OWNER:[a/] 1962-1965

	Top 50 Markets[b/]				All Markets					
	Group-Owned Stations		Single-Owner Stations		Group-Owned Stations		Single-Owner Stations		All Stations	
Nonnetwork Programming	No. of Stations	% of Total	No. of Stations	% of Total	No. of Stations	% of Total	No of Stations	% of Total	No. of Stations	% of Total
Less than 11%	31	27.0%	16	38.1%	133	45.6%	108	58.7%	241	50.6%
11% - 16%	42	36.5	16	38.1	102	34.9	49	26.6	151	31.7
16% - 21%	28	24.3	7	16.7	41	14.0	22	12.0	63	13.3
21% and Over	14	12.2	3	7.1	16	5.5	5	2.7	21	4.4
Total	115	100.0%	42	100.0%	292	100.0%	184	100.0%	476	100.0%
Average Percentage of Nonnetwork Programming	13.8%		12.3%		11.3%		10.0%		10.8%	
	Affiliated Stations Only									
Less than 11%	30	30.0%	15	38.5%	NOT AVAILABLE				238	52.4%
11% - 16%	37	37.0	15	38.5					144	31.7
16% - 21%	25	25.0	6	15.3					59	13.0
21% and Over	8	8.0	3	7.7					13	2.9
Total	100	100.0%	39	100.0%					454	100.0%
Average Percentage of Nonnetwork Programming	12.7%		11.5%						9.7%	

a/ All stations for which data were available in December 1965.

b/ Based on American Research Bureau data listing markets according to 1964 net weekly circulation.

Source: Federal Communications Commission.

buy elsewhere does not offset the loss which the Commission sees in frequent changes of tenure. A further objection sometimes raised is that the licensee who enters for capital gain — i.e., for speculative purposes — is somehow less likely to provide socially meritorious service. On all these counts the Commission has sought to dampen trading by its so-called "three-year rule," which requires licensees to hold stations for a three-year period before sale.

What do the facts show? Does the group owner tend to sell his station more frequently than the single-station owner? Is he really a less stable licensee? Our inquiry undertook to answer five questions.

(1) How many group-owned and single-owner stations are still held by their original owners?

(2) How long have these stations been held by their original owners?

(3) For the traded stations, how long did the first operators (usually the original grantees) hold them before selling out?

(4) For the traded VHF stations, is there a difference between group owners and single-station owners in the length of time stations were held?

(5) Do any other factors appear to be more important than type of owner in explaining the length of time a television station is held before being sold?

The answers to these questions are based on the data developed for the sales price regressions (see Chapter 5 and Appendix C). Although Exhibit 22 shows that, overall, proportionately more single-owner stations were held by their original owners (73.5% vs. 44.4% for group-owned stations), it cannot be inferred that single-station owners are more stable licensees than group owners. For example, Exhibit 23 indicates that of 198 transfers of stations between 1949 and 1965, single-station owners were the licensees in 57% of the sales. Moreover, examination of the average age of one-owner stations reveals that, of the 320 stations still licensed to their original owners, the 176 group-owned stations had been held 143 months on the average compared to 109 months for the 144 single-owner stations. The difference is more striking in the top 50 markets, with the 60 group-owned stations averaging 182 months compared to 111 months for the 46 single-owner stations. Thus, Exhibit 24 clearly illustrates that, for the stations held by their original licensees, group owners kept their stations longer than single owners in every market category.

Exhibit 22

STABILITY OF OWNERSHIP BY MARKET SIZE AND TYPE OF OWNER: 1966

	Group-Owned Stations				Single-Owner Stations			
		Acquired from:				Acquired from:		
No. of TV Homes	Held by Original Owner	Group Owner	Single Owner	Sub-total	Held by Original Owner	Group Owner	Single Owner	Sub-total
Less than 50,000	4	4	5	13	9	1	2	12
50,000 - 100,000	11	7	7	25	14	2	4	20
100,000 - 200,000	31	21	24	76	22	4	7	33
200,000 - 300,000	15	13	12	40	19	1	3	23
300,000 - 400,000	17	10	9	36	21	2	10	33
400,000 - 500,000	8	11	8	27	9	0	3	12
500,000 - 1,000,000	27	22	21	70	18	4	5	27
1,000,000 - 2,000,000	14	7	7	28	7	0	1	8
2,000,000 and Over	12	6	3	21	0	0	0	0
Satellites	26	15	2	43	0	0	0	0
No. of TV Homes Unknown	11	4	2	17	25	0	3	28
Total	176	120	100	396	144	14	38	196
% of Totals for Each Type of Owner	44.4%	30.5%	25.2%	100.0%	73.5%	7.1%	19.4%	100.0%

Source: Derived from Appendix B and background data of Appendix C.

Exhibit 23

SALES DATA ACCORDING TO TYPE OF OWNERSHIP:[a] 1949-1965

	Including Radio Station		Less Than 100% of Stock		All Other		Total	
	No. of Sales	% of Total	No. of Sales	% of Total	No. of Sales	% of Total	No. of Sales	% of Total
Single-Station Owner to:								
Single-Station Owner	11	12.5%	9	19.6%	9	14.1%	29	14.7%
Group Owner	39	44.3	15	32.6	29	45.3	83	41.9
Subtotal	50	56.8%	24	52.2%	38	59.4%	112	56.6%
Group Owner to:								
Single-Station Owner	7	8.0%	3	6.5%	4	6.2%	14	7.1%
Group Owner	31	35.2	19	41.3	22	34.4	72	36.3
Subtotal	38	43.2%	22	47.8%	26	40.6%	86	43.4%
Total	88	100.0%	46	100.0%	64	100.0%	198	100.0%

[a] The 198 transfers represent approximately 65% of all major sales transactions of VHF stations.

Exhibit 24

AVERAGE AGE OF ONE-OWNER STATIONS BY MARKET GROUP
AND TYPE OF OWNERSHIP AS OF JUNE 23, 1966

	Group-Owned Stations		Single-Owner Stations	
Market Group	No. of Stations	Average No. of Months	No. of Stations	Average No. of Months
1 - 50	60	182.3	46	110.5
51 - 100	49	126.3	37	118.8
101 - 150	33	119.8	29	109.9
151 - 200	27	119.6	20	89.8
All Others	7	128.6	12	105.9
Total	176		144	
Average No. of Months		143.2		109.3

Source: Derived from Appendix B and background data of Appendix C.

As for the remaining stations — those not now held by their original owners — information was derived regarding station starting date and date of the first sale. These data (presented in Exhibit 25) provide more evidence in support of the finding of greater stability of the group owner. Classifying the stations according to the type of owner at the time of the first sale, it was found that, among the original owners, group owners held their stations an average of 64 months compared to 47 months for the single-station owners. In addition, analysis of the 198 VHF station sales transactions indicates that group owners (at the time of sale) held their stations somewhat longer than single owners before selling out. Thus, Exhibit 26 shows that, for all markets, groups held their stations an average of 53 months compared to 45 months for single-station owners; the comparable figures for the top 50 markets are 60 months for group-owner sellers and 50 months for single-owner sellers.

Finally, an examination was made as to whether there are, in fact, more important factors than type of ownership to explain the length of time a traded station is held before sale. Utilizing the data and the variables of the sales price investigation (see Appendix C), regression analyses were run with number of months as the dependent variable. In the 198 VHF station sales analyzed, the number of months stations were held before sale was primarily explained by the *age of the station at the time of sale.*

Exhibit 25

LENGTH OF OWNERSHIP[a] FOR ORIGINAL OWNERS CLASSIFIED BY OWNER STATUS AT TIME OF SALE

No. of Ownerships (as of 6/23/66)	Group-Owned Stations: No. of Stations	Group-Owned Stations: Average No. of Months Held[b]	Single-Owner Stations: No. of Stations	Single-Owner Stations: Average No. of Months Held[b]
Two	71	75.2	106	55.1
Three	17	41.4	37	37.8
Four	10	30.7	24	33.0
Five	1	16.0	5	24.0
Six	-	-	1	23.0
Total	99		173	
Average No. of Months		64.3		47.2

a/ Number of months held between station starting date and date of first sale.

b/ At time of first sale.

Exhibit 26

LENGTH OF OWNERSHIP CLASSIFIED BY TYPE OF BUYER AND SELLER:[a] 1949-1965

	Top 50 Markets[b]: No. of Sales	Top 50 Markets[b]: Average No. of Months Held	Top 100 Markets[b]: No. of Sales	Top 100 Markets[b]: Average No. of Months Held	All Markets: No. of Sales	All Markets: Average No. of Months Held
Single-Station Owner to:						
Single-Station Owner	8	45.3	12	43.3	29	36.7
Group Owner	26	51.4	45	53.1	83	48.5
Subtotal	34		57		112	
Average No. of Months		50.0		51.0		45.4
Group Owner to:						
Single-Station Owner	3	134.7	9	75.3	14	69.8
Group Owner	27	51.4	44	51.5	72	49.5
Subtotal	30		53		86	
Average No. of Months		59.7		55.5		52.8

a/ The 198 transfers represent approximately 65% of all major sales transactions of VHF stations.

b/ Based on 1965 market rank.

In short, the data on station transfers indicate:

1. Stations still retained by their original owners had been held noticeably longer by those currently classified as group owners, and this was particularly true in the top 50 markets.
2. Stations put on the market for the *first* time by group owners had been in operation under the same ownership for longer periods on the average than those sold by single owners.
3. Among stations traded one or more times in a sample of 198 transfers, again the group owners tended to hold their stations longer than nongroup owners.
4. Age of station emerged as statistically more important than market size, network tie *or* type of ownership in explaining the length of time stations are held before sale.

In concluding our examination of the relationship of form of ownership to the serving of community needs and interests, it can be said that group stations appeared equally heavily involved in local community affairs and as sensitive to its needs as were single owners; and they demonstrated a greater stability of station tenure. All of this indicates that group owners cannot be said *a priori* to be less responsive to community needs and interests than single owners. On the contrary, the presumption must be that group owners are more responsive than single owners in this area.

10

Diversity of Programming Service ana Viewpoints

ALTHOUGH THE TERM "diversity" is widely used in the broadcasting field, it has never been clearly defined. From its program (as opposed to its political) aspects, it can be assumed that there would be general agreement that diversity means a greater variety of types of programming, particularly when such additional variety serves "minority interests." The concept of diversity should not be confused with an attempt to measure or influence program quality, a difficult job and one which could border on limiting freedom of speech. Commissioner Loevinger summed up this position well when he said:

> The FCC is not capable of promoting quality. Insofar as its powers go, the FCC is only capable of promoting diversity. The FCC is utterly helpless and utterly ignorant in determining quality.[1]

In this chapter two general areas involving diversity in television broadcasting will be examined: first, aspects of the broadcast operations of both group and single stations; second, ways of increasing the number and type of television outlets in an area — measures which, at a minimum, can lead to an increased potential for diversity.

It can be assumed that the more hours a station broadcasts during the day, the greater the potential for increased diversity. An analysis of broadcast hours was made, and Exhibit 27 shows that group-owned stations averaged more hours on the air each week than the nongroup-owned stations, not only in the top 50 markets (125.4 hours for group owners and 120.7 hours for single owners), but also for all markets (120.7 and 115.6 hours, respectively). These data indicate that singly-owned stations do not

[1] In an interview on January 11, 1968, with Alice Neff of the Boston University School of Public Communications.

Exhibit 27

NUMBER OF BROADCAST HOURS PER WEEK BY TYPE OF OWNER: DECEMBER 1965

	Top 50 Markets[a]				All Markets[b]			
	Group-Owned Stations		Single-Owner Stations		Group-Owned Stations		Single-Owner Stations	
No. of Broadcast Hours	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total
110 and Under	11	9.6%	7	16.7%	43	14.7%	41	22.3%
111 - 121	9	7.8	7	16.7	85	29.1	73	39.7
121 - 131	46	40.0	19	45.2	113	38.7	55	29.9
131 and Over	49	42.6	9	21.4	51	17.5	15	8.1
Total	115	100.0%	42	100.0%	292	100.0%	184	100.0%
Average No. of Broadcast Hours	125.4		121.7		120.7		115.6	

a/ Based on American Research Bureau data listing markets according to 1964 net weekly circulation.

b/ All stations for which data were available in December 1965.

Source: Federal Communications Commission.

utilize their facilities as intensively as group owners and render less service through a shorter broadcast day (averaging five hours less per week).

Reflecting the major role of entertainment offerings in the total program pool, it has been argued that one way of diversifying television broadcasting is through increasing the number of nonentertainment programs. Some disputants have injected a qualitative tone to the distinction between entertainment and nonentertainment programs, the implication being that the latter are "uplifting." However, there is little to guarantee the educational content or quality of nonentertainment programs in general. Furthermore, many different types of programs are included under the entertainment label, which decreases the specificity of this category.

For these reasons the distinction between entertainment and nonentertainment programs, as reported on the license renewal forms, has limited value. However, the analysis of the results for group and nongroup-owned stations in the top 50 markets and in all markets is enlightening. Exhibit 28 shows that there was a high degree of conformity in the program policies of group and nongroup stations, with entertainment accounting for 75% of all programming for group owners and 73% for the single owners in the top 50 markets; for all markets, the figures were identical — 75% for both groups and nongroups.

Another approach to diversification of programming would be to increase the number and type of television outlets in an area, as, for example, educational television. Since its inception, educational television has received between $45 and $50 million in the form of money, equipment, technical advice and facilities from commercial television. Of this sum, more than two-thirds has been contributed by group-owned stations. Commercial television has thus, in effect, helped to build a competitor in the home market. While educational TV, because of its program orientation and its nonprofit status, does not generally represent competition in the commercial sense, it does represent a source of competition for audience and for influence in the community.

Whereas some of the stations surveyed made no contribution to educational TV as a matter of policy, the majority of them have done so and are continuing to do so. Of the stations covered by either questionnaire analysis or direct interview, almost one-fourth have contributed $40,000 or more in money, facilities and equipment to local educational television stations, and of these, 85% are group-owned and 15% are singly-owned. In some cases the commercial stations played a key role in inaugurating educational television by donating transmission facilities as well as much-needed technical advice. One station leases transmission and studio facilities to an ETV station for $1.00 a year. Another has furnished studio facilities for college courses in television production valued at an estimated $75,000 since the inception of educational TV in the community.

Exhibit 28

PORTION OF TOTAL PROGRAMMING DEVOTED TO ENTERTAINMENT BY TYPE OF OWNER: DECEMBER 1965

	Top 50 Markets[a]				All Markets[b]			
	Group-Owned Stations		Single-Owner Stations		Group-Owned Stations		Single-Owner Stations	
Percentage of Time Devoted to Entertainment	No.	% of Total	No.	% of Total	No.	% of Total	No.	% of Total
70% or Less	22	19.1%	13	30.9%	61	20.9%	39	21.2%
71% - 80%	77	67.0	23	54.8	186	63.7	110	59.8
81% - 90%	16	13.9	6	14.3	45	15.4	35	19.0
Total	115	100.0%	42	100.0%	292	100.0%	184	100.0%
Average Percentage of Time Devoted to Entertainment	75.0%		73.4%		74.9%		75.1%	

a/ Based on American Research Bureau data listing markets according to 1964 net weekly circulation.

b/ Stations for which data were available in December 1965.

Source: Federal Communications Commission.

The potential for diversity can also be increased by the development of UHF. A key method to attain the objectives of diversity of programming sources and viewpoints and prevention of concentration of economic power would be to increase the number of stations operating in each market. The UHF spectrum offers the available channels to heighten competition, to form a base for new networks, to provide additional programming viewpoints, and to strengthen the nonnetwork segment of the industry.

The procompetitive implications of an activated UHF band can best be shown by referring to Exhibit 29 which indicates the number of TV stations actually on the air and the potential number of competing TV stations in the top 50 markets. In 1966, 40 of the 50 major markets had fewer than five stations each on the air (132 stations in all), and only 10 markets had five or more stations. Potentially, with full UHF activation, five markets could have 10 to 15 stations each (there are no such markets today) and three markets could eventually have as many as 15 or 16 stations each (a maximum total of 46 stations).

Exhibit 29 also shows that overall most stations were located in markets with fewer than five outlets (214 out of 230 markets, with 487 out of 587 stations). Potentially, the majority of TV outlets could be located in markets with five or more stations each: these markets (117 out of 230) would include 864 out of 1,158 stations.

The implications are clear. Activation of the UHF means:

1. more multistation markets with more competing stations, more competing media voices and, presumably, more independent stations;
2. the technical basis for another national network or, at least, for additional specialized network groups composed of group-owned stations and aimed at national and regional markets not now covered by the national networks; and
3. coincidental activation of some of the 103 UHF ETV channels not yet assigned (1966) in the top 50 markets alone. (See Exhibit 30.)

How would the top 50 rule have affected the development of UHF and the achievement of Commission goals? Whenever strong policy implementation leads a regulatory body to exclude or discourage various classes of applicants from entering markets, it is important to weigh the cost of such exclusion, including the possible deflecting of other objectives.

The previous analysis of sale prices revealed that the prices which both group owners and single-station owners received for their stations depended primarily on market size and age of station. Although the evidence that groups did not pay more for comparable stations casts doubt on the *magni-*

tude of the benefits derived from such sales, nevertheless, it is plain that the exclusion of group owners would harm the single owner. Such exclusion clearly reduces the number of potential buyers who are best able to raise money quickly and who have the experience and know-how to risk venture capital. Outsiders would lack this experience and know-how and would, therefore, be less willing to undertake comparable risks even with capital parity.

In 1966, there were 325 separate TV enterprises in the United States — 129 groups and 196 nongroup entities. Together, they operated 592 TV stations. The 193 stations in the 50 leading markets had 119 separate owners — of whom 60 owned more than one TV station in the 231 markets of the United States. The Commission's top 50 rule would have discouraged group investors from building new UHF stations in the top 50 markets and/or from buying or bidding for many of the stations now on the air, including the many UHF's which might be activated in the future. For example: the 13 groups (including the networks) owning three or

Exhibit 29

EXISTING AND POTENTIAL COMMERCIAL TV STATIONS AS OF JUNE 23, 1966

	Top 50 Markets		All Markets	
	No. of Markets	No. of Stations	No. of Markets	No. of Stations
No. of Stations	TV Stations on the Air			
Less than 5	40	132	214	487
5 - 10	10	61	15	90
10[a]	0	0	1	10
Total	50	193	230[b]	587[b]
No. of Channel Assignments	Channel Allocations			
Less than 5	1	4	113	294
5 - 10	41	290	102	675
10 - 15	5	57	11	126
15 and Over	3	46	4	63
Total	50	397	230	1,158

[a] Note that Hawaii is treated as one market.

[b] Excludes Alaska.

Source: Derived from Television Digest, Inc., Television Factbook, No. 36.

Exhibit 30

USED AND UNUSED CHANNEL ALLOCATIONS
AS OF JUNE 23, 1966: ALL MARKETS[a/]

	Market Groups					All Markets
	1-50	51-100	101-150	151-200	201 and Over	
Allocations						
Commercial:						
VHF	161	140	126	97	40	564
UHF	236	184	97	60	17	594
Educational:						
VHF	27	36	27	18	6	114
UHF	160	136	109	74	29	508
In Use						
Commercial:						
VHF	155	118	107	68	27	475
UHF	38	46	14	7	7	112
Educational:						
VHF	25	22	14	2	1	64
UHF	35	10	2	1	0	48
CP's Outstanding						
Commercial:						
VHF	2	4	3	4	5	18
UHF	57	17	12	2	1	89
Educational:						
VHF	0	3	1	2	1	7
UHF	11	8	8	0	1	28
Applications Pending[b/]						
Commercial:						
VHF	0	0	0	4	1	5
UHF	46	21	13	4	1	85
Educational:						
VHF	0	0	4	1	0	5
UHF	11	8	8	4	0	31
Balance						
Commercial:						
VHF	4	18	16	21	7	66
UHF	95	100	58	47	8	308
Educational:						
VHF	2	11	8	13	4	38
UHF	103	110	91	69	28	401

a/ Note that all channel allocations were assigned to an existing market.
b/ Includes renewal applications for off-air stations.

Source: Derived from Television Digest, Inc., Television Factbook, No. 36.

more stations of either frequency in the top 50 markets — but who were below their maximum in all markets — could not hold or buy another station of any kind in the top 50 markets; and an additional 4 groups owning two or more VHF stations in the top 50 markets — but who were below their maximum in all markets — could not build or buy another VHF station in the top 50 markets.

The exclusion of these TV broadcasters as potential buyers would probably limit the competition for stations available for sale in the top 50 markets, and this might result in lower prices being offered for such stations. Thus, a Commission policy geared to enhance the economic opportunity of nongroup enterprises could in fact result in stations being worth less on the open market. The lessened expectation of future potential capital gains could also discourage nongroup investment in TV stations, particularly in UHF stations, since the expectation of long-run capital gains is often an important part of the incentive structure of current TV investment, especially by privately-held nongroup entrants.

By discouraging group owners from entering the top 50 markets, the FCC would have entrenched those fortunate incumbents already located in the top 50 by protecting them from future entrants into the 95 commercial UHF channels not yet allocated. This would have meant that the groups and nongroups now operating stations in the country's major markets would not have been subjected to additional competition (from the UHF channels) as rapidly as would otherwise have been the case.

What evidence is there that group owners can or will contribute to the development of the UHF spectrum? A review of the groups' past record throws some general light on their potential contributions. The 1956-1966 period is of special interest, as these were clearly the "lean" years for UHF. In determining the degree to which groups and nongroups have invested in UHF and in assessing their relative capabilities for future investment in UHF, the crucial measure is the number of UHF stations. Exhibit 31 shows not only that groups held slightly more UHF stations in all markets (60) than did nongroups (52) but also that the number of UHF's held by single owners declined in all markets between 1956 and 1966 (from 57 to 52), whereas the number of group-owned UHF's doubled during the decade (from 30 to 60). Thus, the groups, which owned approximately one-third of all UHF stations in 1956, increased their holdings and held more than half of all such stations by 1966. Since these trends indicate actual growth in the groups' UHF investment, they can hardly be criticized as "slighting" UHF.

Although groups have not rushed into the unprofitable UHF band in the past, there is reason to believe that they will enter far more extensively when UHF becomes more profitable. The fact that, of a sample of 95 UHF stations leaving the air since the advent of television, 70 were single-owner stations suggests that groups have simply moved into their markets more

Exhibit 31

INCIDENCE OF VHF AND UHF STATIONS BY TYPE OF OWNERSHIP: 1956 AND 1966

	1966			1956		
	Group-Owned Stations	Single-Owner Stations	Total	Group-Owned Stations	Single-Owner Stations	Total
Market Group: 1 - 50						
VHF	118	37	155	80	50	130
UHF	16	22	38	12	21	33
Total	134	59	193	92	71	163
All Markets						
VHF	336	144	450	175	194	369
UHF	60	52	112	30	57	87
Total	396	196	592	205	251	456

Source: Derived from Appendix B.

cautiously and stayed on accordingly — not that their markets were particularly better. There is no significant difference between group and single owners in the average market rank of the UHF stations which went off the air: 49 for the group-owned stations compared to 55 for the single owner. An examination of the distribution of the 112 UHF's still on the air as of the middle of 1966 showed that the single owner was, on the average, in slightly larger markets (average rank, 80) than the group owner (average rank, 86). The nongroup's showing of bad judgment in the early 1950's by entering mixed spectrum markets under adverse conditions by no means lessens the contributions of the groups whose greater caution in entering UHF produced more lasting results. The advantage of groupness in providing the needed venture capital in the early days of hard economic realities and imperfections of the industry's market structure does not make the groups' past or potential contributions any less significant.

There is an economic error in any policy which excludes a significant portion of investors in a risky, new field of potentially great social and economic importance. Since the 129 group owners operating TV stations obviously constitute a major source of experience and resources for UHF development, the Commission should be trying to devise ways to *promote group UHF entry,* not working hard to *prevent their entry.* This is so inasmuch as there are no serious anticompetitive dangers posed by groupness or group acquisitions as such but rather significant procompetitive potential in an activated UHF band, possibly including more vigorous competitive alternatives to the national network service.

PART FIVE

CONCLUDING OBSERVATIONS

11

Primum Non Nocere

ON FEBRUARY 9, 1968, the FCC released a *Report and Order* which decided against adoption of the proposed top 50 rule. The Commission did state, however:

> In particular, in light of the special problems concerning the top 50 markets set forth in the Notice of Proposed Rule Making herein, we will expect a compelling public interest showing by those seeking to acquire more than three stations (or more than two VHF stations) in those markets. The compelling showing should be directed to the critical statutory requirement of demonstrating, with full specifics, how the public interest would be served by a grant of the application — that is, the benefits in detail that are relied upon to overcome the detriment with respect to the policy of diversifying the sources of mass media communications to the public. However, within the total limits now contained in the rules, we believe the *ad hoc* approach will better enable us to deal with particular situations in particular communities than would a new fixed limit.[1]

The prime reason stated for dropping the proposed policy was that the growth of UHF since institution of the rule-making procedure:

> ... has lowered the previous degree of concentration of station ownership in these markets and ... is providing as many separate owners and separate viewpoints as would have occured with a

[1] *Report and Order,* in the Matter of Amendment of Section 73.636(a) of the Commission's Rules relating the Multiple Ownership of Television Broadcast Stations, Docket No. 16068, Paragraph 17, p. 152. Reprinted in full in Appendix A.

more restrictive multiple ownership rule in the absence of these stations.[2]

In voting for the rule, Commissioner Loevinger joined the three Commissioners who opposed adoption of the original interim policy, Commissioners Hyde, Lee and Wadsworth. Against dropping the proposed rule were Commissioners Bartley, Cox and Johnson. Commissioners Bartley, Cox and Henry (whom Johnson replaced) had been in favor of adoption of the original interim policy.

In his concurring opinion Commissioner Loevinger pointed out that he did not consider it inconsistent or irregular to vote for adoption of the present rule although he voted for the 1964 and 1965 notices.

> . . . my position is that voting to propose a rule, or institute a rulemaking proceeding, does not involve any commitment as to the position to be taken on adoption of the rule. On the contrary, I believe, as I have often stated, that the Commission should institute rulemaking proceedings, gather evidence, consider arguments and make as full an analysis as possible before reaching any conclusion, rather than after it has decided. Although it has been argued that the Commission should exercise its judgment on the merits before proposing rulemaking (see dissenting statement of Commissioner Johnson . . .), I emphatically reject that position. I believe that the spirit, and probably the letter of administrative due process, as well as basic principles of rational decision-making, require hearing and considering the evidence and arguments before reaching a judgment rather than afterwards. While I still believe the present subject warranted reexamination and reconsideration after the passage of a decade since adoption of the multiple ownership rules, I do not consider myself bound or in any degree constrained by the institutional opinion which accompanied initiation of the present proceedings.

Certainly, carried to an extreme, the position which Commissioner Loevinger opposes would mean that merely proposing a rule or instituting a rulemaking procedure would be virtually equivalent to adopting the rule.

In his carefully-reasoned concurring opinion, Commissioner Loevinger states that he voted to drop the proposed rule because there had been no evidence of increasing concentration in television station ownership and because the proposed rule would, in fact, be *anticompetitive* since it would give the present networks or other large multiple owners a preferred position in relation to existing small or new enterprises.

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[2]Ibid., Paragraph 14, pp. 151-152.

> ... By any generally accepted test, there has been no increase in concentration of television station ownership in the top 50 markets up to the present time.[3]
>
> * * *
>
> ... the proposed rule would tend to perpetuate the present network oligopoly and protect the present multiple owners against new or increased competition, while preventing or discouraging the growth and expansion of smaller enterprises in the television field and the entry of strong new enterprises. Thus it appears to me that the proposed rule is likely to do significant harm to the cause of diversity and competition in the field of television broadcasting without countervailing benefits.[4]

Commissioner Loevinger sums up his position against adoption of the proposed rule by reference to the medical maxim of *primum non nocere* from which this chapter takes its title.

> There is a maxim taught in medical schools that is relevant here. An axiom of medical practice is 'Primum non nocere'—first, and above all, do no harm. If you cannot help the patient, at least do not administer medication or treatment that will hurt him. It seems to me that this principle should be equally applicable in the field of regulatory action. Before we impose new rules we should be reasonably sure that they will improve the situation, or at least not make it any worse. With respect to achieving competition and diversity in television programming, the proposed rule appears likely to make matters worse rather than better.[5]

One of the basic policy objectives in broadcasting regulation described earlier is the avoidance of the exercise of undue economic power. This is not equivalent, however, to attempting to maximize the number of competitors, a rather over-simplistic nose-counting. Policies which emphasize number of *competitors,* even if workable, may act to the detriment of *competition*. Furthermore, use of the term "competitors" in relation to television stations competing in different markets has definite limitations since only in very specialized terms can television stations serving different markets be said to be competitors.

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[3]*Concurring Opinion of Commissioner Lee Loevinger Regarding Multiple Ownership of Television Stations in which Commissioner James J. Wadsworth Joins.* See Appendix A, p. 174.
[4]Ibid., p. 177.
[5]Ibid., p. 176.

Another imperfection in the analysis of the advisability of the top 50 rule is the elevation of the evidentiary element of local ownership, a specific criterion devised for the disposition of adjudicatory application proceedings, to the status of a basic policy objective. The objective should be the provision of programming to the public which best serves its needs and interests. It is not clear what type and what proportion of local programming can best serve this goal. It is far less clear that a local owner would have either greater ability or greater desire than a multiple owner to fill this need. The whole logic of effective competition is that the entrepreneur will, while seeking maximum gain, come to maximize preferences of those who use his services. The continual emphasis on local ownership reveals misgivings or unawareness of how effective the competitive remedy has been.

The extreme complexity of the television industry and, of necessity, its regulation is a further argument for the use, in this instance, of the *primum non nocere* maxim. By attempting to solve too many problems through regulation of ownership, other more powerful countervailing or compensating forces may tend to be ignored. For example, a fourth network would have the potential of contributing to diversity and competition. This consideration takes on special importance because there *is* economic concentration in network operations — due primarily to the lack of economic support for more than three networks at present. Strengthened nonnetwork group owners could conceivably lead to *increased* diversity and competition insofar as they can contribute to the establishment of a new network. The economic and other factors relating to the establishment of a new network are certainly areas which merit detailed study.

Commissioner Johnson was quoted earlier in this book as being concerned with the high profit levels in television broadcasting. Most analysts would agree that a large or major reason for these profit levels is a result of technical limitations on entry due to limited spectrum space. Certainly the addition of new competitors in individual markets through utilization of the UHF band should act to lower profits. Investigation of the techno-economic problems of increasing the number of stations in given markets would seem to be a more productive way of dealing with this concern of spreading the wealth than limiting ownership.

The question of program diversity is a much larger one than is comprehended in the question of group ownership. Given deficiencies in knowledge and information, it would appear preferable to adopt positive action to promote diversity and similar goals rather than to adopt restrictive action. This, of course, should not be taken to mean that such positive action as encouraging Pay TV or CATV will automatically lead to greater diversity; it could have the opposite effect and detailed analysis is necessary before reaching any judgment. For example, the development of Pay TV could theoretically lead to *less* diversity in commercial television. CATV could harm marginal stations, particularly those operating in the UHF band, thus having a similar negative effect on diversity. These issues are not being prejudged here; suffice it to say that in a complex area such as the encouragement of diversity, a direct positive approach to the issue is frequently preferable to an indirect restrictive approach.

There seems little question that there is something of an unfinished nature in the Commission's decision. Commissioner Johnson objects to the Commission's use of *ad hoc* judgments.

> As is often the case when the Commission is making seat-of-the-pants judgments, the Commission refers to its 'continuing experience in the broadcast field'—sometimes referred to as 'accumulating insight.' This is the ultimate justification for whatever we do.[6]

It would appear that Commissioner Johnson and, no doubt, other Commissioners would welcome the development of a technique of analysis and a body of knowledge concerning the operation of the broadcasting industry as a whole in all its ramifications. That this would be a difficult, time-consuming job does not mean that it should be avoided in favor of "seat-of-the-pants judgments." It should be noted, however, that any study of the industry, whether comprehensive or limited, must be soundly based on statistics. Commissioner Loevinger has stated that he felt that data prepared by the Commission staff relating to the top 50 rule were questionable.

> ...the data cited in the Commission Notice were misleading because they purported to show concentration in the top 50 markets by statistics which included among 'multiple owners' all licensees with one station in the top 50 markets and an interest in any other television station in any other market, whether it was in the top 50 markets or in some smaller market. Thus, the data on which the Commission originally acted analyzed the situation in the top 50 markets on the basis of statistics which related in part to those markets and in part to other markets. This is clearly an erroneous mode of analysis.[7]

Certainly the Barrow Report would have been immeasurably strengthened and its conclusions made more credible had there been greater emphasis on the use of statistics. The above criticisms of the staff's and Barrow's use of statistics is not meant to imply that such was done in order to push a certain partisan point of view. The position here is simply that a dialogue based on the use of statistics — varied as their interpretations might be — is an essential

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[6] *Dissenting Opinion of Commissioner Nicolas Johnson*. See Appendix A, p. 164.
[7] Op. cit., p. 172.

element in developing a sound and consistent regulatory policy. An analysis so grounded does not eliminate differences in the judgment of different individuals — but it does help to clarify the issues and, at times, can even help to reconcile apparently opposing views.

One reason for the feeling that the abandonment of the proposed top 50 rule leaves unfinished business is the limitations of the five VHF and two UHF rule, to which ownership regulation now reverts. While clear, predictable and exact, the five-and-two rule does not differentiate between markets of different sizes. Under the rule, while all markets are equal, some are more equal than others. The rule does not "grandfather" since no owner presently has more than the maximum allowable number of stations; however, it does help to confirm the economic and other advantages derived by established owners in large markets through reaching a large total audience. While there appears to be no present pressure to reexamine this rule, it would be helpful if the multiple ownership question were not regarded as closed. Certainly, if the Commission undertook or encouraged a broad examination of the total picture of regulation, the question of limiting ownership should be an important component of such an investigation.

Appendix A

NOTICE OF PROPOSED RULE MAKING AND MEMORANDUM OPINION AND ORDER

and

REPORT AND ORDER

Before the
Federal Communications Commission
Washington, D.C. 20554

FCC 65-547
68787

In the matter of

Amendment of Section 73.636(a) of the Commission's Rules relating to Multiple Ownership of Television Broadcast Stations.

Docket No. 16068

NOTICE OF PROPOSED RULE MAKING
AND
MEMORANDUM OPINION AND ORDER

By the Commission: Commissioners Hyde and Lee dissenting and issuing statements; Commissioner Wadsworth dissenting.

1. Notice is hereby given of proposed rule making in the above-entitled matter.

2. Sections 73.35 (b), 73.240 (b), and 73.636 (a)(2) of the Commission's Rules are generally known as the "concentration of control" rules. These provisions are designed to further two important objectives under the Communications Act: Maximum competition among broadcasters and the greatest possible diversity of programming sources and viewpoints. The rules provide that no license for an AM, FM, or television station will be granted to any party if the grant "would result in a concentration of control" in the particular broadcast service "in a manner inconsistent with public interest, convenience, or necessity." A number of specific factors are to be considered in determining whether there will be a concentration of control contrary to public interest, 1/ but such a concentration is in any event deemed to exist if any party has an interest in more than a specified maximum number of stations in each service. For AM and for FM, the maximum number of stations is seven; for television it is also seven, but no more than five television stations may be VHF.

1/ The wording of the AM rule and the FM rule is the same: "In determining whether there is such a concentration of control, consideration will be given to the facts of each case with particular reference to such factors as the size, extent and location of areas served, the number of people served, classes of stations involved and the extent of other competitive service to the areas in question." The language of the television rule is identical except that there is no reference to "classes of stations involved."

3. The history of Commission concern in this important area goes back over 25 years. The first ownership rule was adopted in 1940, and pertained to FM stations. 5 F.R. 2382. It provided that no person should own or control more than one station except upon a showing that competition would be fostered or a distinct service rendered, and that an undue concentration of control would not result. It further provided that the ownership or control of more than six stations would be considered a concentration of control inconsistent with the public interest. In 1941 a substantially similar rule was adopted for television stations, except that the maximum number of stations was limited to three. 6 F.R. 2282, 2284-5. In 1944 the three station limitation was raised to five. 9 F.R. 5442. In Sherwood B. Brunton, 11 F.C.C. 407 (1946), the Commission, in effect established a seven-station limitation with respect to ownership of AM stations. In December 1953, the Commission considered the question of multiple ownership in all three services, and essentially adopted the present rules. 18 F.R. 7796. The television rule then adopted allowed a maximum of only five stations. The rule was amended the following year to allow ownership of two additional UHF stations. 11 Pike and Fischer, R.R. 1519.

4. Thus, the concentration of control rules were adopted in substantially their present form in 1953. 2/ Our experience with the television service, specifically, is that the present limit of seven stations, no more than five of which can be VHF, is not appropriate for all licensees wherever located. We have become particularly concerned about television multiple ownership in the largest population centers. In the paragraphs which follow, we discuss this problem in more detail and propose what we believe to be an appropriate change in the television multiple ownership rule.

5. With respect to the AM and FM services we are continuing to study the appropriateness of the present limitations. As of this time, we have not reached a conclusion as to whether we should initiate further limitations on the ownership of these facilities.

2/ The Commission's authority to promulgate rules placing an absolute numerical limitation on the number of stations which can be owned was sustained in United States v. Storer Broadcasting Co., 351 U.S. 192 (1956). On remand, the U.S. Court of Appeals held that the rules were not unreasonable, Storer Broadcasting Co. v. United States, 99 U.S. App. D.C. 369, 240 F. 2d 55 (1956).

CONCENTRATION IN THE LARGE MARKETS

6. It is axiomatic that American industry generally should be effectively competitive and that undue concentrations of power should be avoided. These propositions are accepted national policy. They are imbedded in the Communications Act as well as in the antitrust statutes and they underlie the American free enterprise system. Basic competitive principles are particularly important in the licensing of broadcast stations: First, because we are dealing with the most influential of all communications media; and second, because we are required for technical reasons to limit and control entry into the broadcast field. The second factor is a very substantial limitation on the free, competitive system as it operates in most other industries. If entrepreneurs could launch new VHF stations in the top 50 markets on the basis of the usual market criteria -- i.e., the profitability of existing stations, the increases in the capital value of stations, and the opportunities for growth -- we have no doubt but that the number of new VHF stations would be substantially greater. But the opportunity for free entry into the VHF marketplace is not available because of frequency limitations.

7. Our concern with growing concentration of control in the largest markets has led to an interim policy regarding further acquisitions of television stations. On December 18, 1964, we issued a public notice stating that until more comprehensive proposals regarding multiple ownership in large cities were formulated, it would be our practice, barring a compelling affirmative showing, to designate for hearing any application for acquisition of a VHF television station in the 50 top television markets filed by a party already owning one or more stations in one of these markets. 3/ In support of this action, the notice set forth the following statistical summary of multiple television ownership in the largest markets:

> The top 10 markets include almost 40 percent of all TV households (roughly 20 million homes). Within these markets are 40 VHF stations, of which 37 are held by multiple owners and the remaining 3 are licensed to companies owning daily newspapers in the same cities. Similarly, the top 50 markets include almost 75 percent of all TV homes: Within these markets are 156 VHF stations, of which 111 (71 percent) are licensed to multiple

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3/ Public Notice, FCC 64-1171, December 18, 1964. Applications to acquire two or more VHF stations in the top 50 markets by a party not already owning stations in these markets are also subject to the hearing requirement. The 50 largest markets listed in the Notice are as ranked by the American Research Bureau, based on the net weekly circulation of the largest station in the market.

ownership interests while 17 of the remaining 45 stations have joint interests with daily newspapers in the same markets. Moreover, there is a clearly discernible pattern of the largest multiple owners concentrating their holdings in the largest markets. Thus, the eight multiple owners holding the maximum allowable number of 5 VHF stations have 40 VHF stations, of which 22 are located in the top 10 markets, 32 in the top 25 markets, and 38 in the top 50 markets.

8. Not only is the level of concentration in the larger markets at a high point but it has been increasing. The table below compares the level of multiple ownership in 1956 and 1964:

Top 50 Markets: Multiple Ownership Interests, 1956 and 1964:

	1956	1964
Total VHF Stations	130	156
Number of VHF Stations licensed to multiple owners	75	111
Percent of VHF Stations under multiple ownership	57.7	71.2
Number of VHF Stations licensed to non-multiple owners	55	45
Number of separate owners of VHF Stations	88	91
Increase in number of VHF Stations in 8 years	-	26
Decrease in number of single VHF owners	-	10

9. This table shows, among other things, that while the total number of commercial VHF stations in the top fifty markets increased by 26 between 1956 and 1964, the number of separate owners increased by only three. The number of single station owners decreased from 55 to 45, or 18%. Not shown in the table is another important fact: of the 91 separate owners in the top fifty markets, 28 (31%) now control 93 VHF stations, or 60% of the total.

10. These statistics reflect an apparent trend toward more VHF stations coming under group ownership in the largest population centers and a corresponding decline in the number of single station owners. We are concerned that, under the current limit of five VHF stations per owner, there may be a continuation of this trend until the present figure of 91 owners in the top fifty markets is reduced to a much lower number.4/ We are also concerned that the future growth of UHF -- which has its greatest immediate potential in these large markets -- may follow the VHF pattern. Therefore, to deal with this trend in VHF and provide for effective preventive action now in the UHF field, we are proposing to revise Section 73.636(a)(2) to provide substantially as follows:5/

> a. No person may have interests in more than three television stations within the 50 largest television markets, and no more than two of these three stations may be VHF.
>
> b. No divestiture of existing facilities would be required, but the new provisions would be applied to applications for new stations, and (with some exceptions described within) to applications for assignments and transfers.
>
> c. Subject to other portions of the rules, the present maximum limitation of seven television stations, of which no more than five may be VHF, would remain unchanged.

11. <u>The Top-Fifty-Market Concept</u>. We are proposing the 50-market cutoff for three reasons. These are (a) the substantial degree of ownership concentration reached in these markets; (b) the high proportion of the total population resident in these areas and consequently the very large audiences reached by the individual VHF stations; and (c) the availability of ample economic support for individual, local ownership of both VHF and UHF stations in these markets.

4/ The mathematical limit under our present rules -- with no further increase in VHF stations assigned to these markets -- would be 32 owners. We do not, of course, anticipate such an extreme reduction, but we do feel that these figures illustrate the large remaining potential for further concentration of ownership.

5/ The text of the proposed rule is set out in the attached Appendix. We are also, today, issuing a Public Notice modifying the interim policy announced December 18, 1964 to conform to the proposed rules discussed in this Notice of Proposed Rule Making.

12. We have already described the extent of ownership concentration in the top fifty markets. Further statistics show clearly that as market size declines, the incidence of multiple ownership decreases. The following table shows the incidence of multiple ownership in various categories within the top 100 markets:

Market Size	No. of VHF Stations	No. of VHF Stations Under Multiple Ownership	% of VHF Stations Under Multiple Ownership
1 - 10	40	37	92.5
11 - 25	49	32	65.3
26 - 50	67	42	62.7
51 - 75	64	34	53.1
76 - 100	46	20	43.5

Thus, the tendency toward concentration of ownership, while substantial in markets below the top 50, is not as high.

13. With respect to the population consideration, we have noted that roughly speaking the top 50 markets include almost 75 percent of all television homes. By comparison the top 75 markets include about 85 percent of television homes, and the top 100 markets, roughly 90 percent. Thus, the increments of additional television homes covered decrease markedly as between the top 50 and the next 50 markets: 75 percent as against 15 percent. In proposing to curb ownership in the top fifty markets we are actually recognizing one of the chief criticisms which has been made of the present rule -- i.e., that it treats ownership of five "big" stations the same as ownership of five "small" stations.

14. Similarly, with respect to the matter of economic support, no one can validly argue that multiple ownership is required in order to provide capital for the establishment or continuation of television service in the top 50 markets. And while we are not holding that multiple ownership is needed, for example, in the lower end of the top 100 markets, these smaller markets do report lower per-station revenues and a larger incidence of "losing" stations.6/

6/ See Table 12, "TV Broadcast Financial Data--1963," Public Notice #54732.

15. In any event, although we believe there are sound grounds for selecting the top 50 markets as a reasonable cutoff, we shall consider carefully any arguments that may be advanced in this proceeding for a different cutoff level.

16. The Specific Numerical Limitation. Parties are also invited to comment on the specific numerical limit proposed -- three stations, no more than two of which may be VHF. In proposing this figure, we are well aware that no specific ownership limitation describes an abstract point beyond which, in every case, public injury occurs. Our proposal is derived, rather, from experience. Based upon the large populations in the top fifty markets, the great trend toward concentration which has occurred under the present rule, the present distribution of ownership, and the remaining potential for competition, we feel that the proposed limit is more reasonable than is the present rule. Commenting parties should therefore address themselves to this question: Is the existing ownership limit, the one proposed here, or some other regulation, best suited to present circumstances?

17. Television Ownership Below The Maximum Limits. The existing rule lists various factors to be considered in determining whether there is undue concentration of control below the maximum level of 7 television stations or 5 VHF stations, including the "size, extent and location of areas served, the number of people served, classes of stations involved and the extent of other competitive service to the areas in question." The proposed rule retains this list of evidentiary factors. We recognize that many of the reasons underlying our more restrictive ownership proposals for the top fifty markets apply also, to a substantial degree, in markets not very far below the top fifty. In such cases, we would continue to make use of the ad hoc process to examine acquisition of stations within the maximum five-VHF plus two-UHF limit. In this context, we request comments as to whether or not the present list of evidentiary factors should be expanded to include other factors, such as the overall effect on a local competitive situation of an added multiple owner, the nature of any distinctive program service a multiple owner may seek to offer, etc.

18. Additional Questions. We specifically request comments on several other questions bearing on the desirability of a more restrictive ownership rule in the top fifty markets:

(a) Is multiple ownership necessary for a licensee to undertake program production in competition with networks and other program suppliers? If so, what degree of multiple ownership is necessary?

(b) Will the proposed rules have any effect on the possibilities for establishment of a fourth television network?

(c) Is there any necessary correlation between a licensee's ability to present "quality" programming and multiple ownership? If there is any such correlation, is it strong enough to outweigh the strong policy considerations favoring the widest possible diversity of ownership?

(d) Given the fact that we propose no compulsory divestiture of existing stations, what long-term increase in diversity of ownership may the proposed rules be expected to accomplish? More specifically, what increases in the number of individual owners in the top fifty markets may be expected as a result of assignments and transfers and the growth of UHF?

19. In preparing comments regarding the proposed rule change, we request that parties be guided by the following considerations: We regard the question of our statutory authority to issue rules in this area as well settled. Therefore, comments should focus upon the question of need for the changed rules and the appropriateness of the specific rule proposed. In arguing need, or lack of need, for a new rule, parties may submit programming showings in a manner which seeks to demonstrate that the programming was made possible solely by virtue of a multiple ownership situation which could not arise under the proposed rule. Parties opposing the proposed rule should concentrate primarily upon the question of public benefits which may be ascribed to multiple ownership in excess of the level proposed herein. In short, the issue posed is not as between multiple ownership and single ownership, but as between the present level and a more limited degree of such ownership.

20. Because the questions involved here are of considerable importance, oral presentations before the Commission en banc would be appropriate and helpful. We will schedule oral argument after comments and reply comments are received, and all interested parties will be afforded an opportunity to participate.

PETITIONS FOR RECONSIDERATION OF DECEMBER 18, 1964 PUBLIC NOTICE ANNOUNCING INTERIM POLICY

21. In the Public Notice of December 18, 1964, we indicated that the interim policy adopted therein would be used pending the formulation of more comprehensive proposals following our study of concentration. The results of this study are reflected in the present Notice of Proposed Rule Making and the attached Appendix. We shall

therefore terminate the interim policy adopted on December 18, 1964. That policy will be replaced by a new interim policy conforming to the above proposal and therefore less restrictive in its application. See separate Public Notice, announcing a new policy based on the rule proposed in the Appendix hereto, pending the outcome of the present proceeding.

22. In the circumstances, it is appropriate to comment on three timely petitions for reconsideration of the action taken in the December 18 Public Notice, 7/ which requested that the policy of that notice either be rescinded or that its effectiveness be stayed indefinitely. The petitioners variously urge (1) that the policy is an arbitrary announcement by the Commission that it will not expeditiously carry out the processing of applications under the provisions of Section 309(a) of the Act; (2) that there is no evidence that the trend to increases in multiple ownership of television stations, especially in the major markets, has had deleterious effects with regard to competition or diversification, and there is no urgent or compelling concern about these matters; (3) that, therefore, the action was arbitrary and capricious; (4) that the action of the Commission in adopting the interim policy was nominally procedural but in effect substantive because the knowledge that certain applications for acquisition of VHF stations by or from multiple owners in the major markets will be designated for hearing -- a type of procedure that may be long and time consuming -- will stop the flow of such applications and that the proposed policy should have been presented through the rule making process; and (5) that this will defeat rather than promote the Commission's objectives of fostering competition and diversity in program presentations.

23. The contention that our interim procedure is improper, and that it should not be adopted without rule making proceedings, misses the purpose and effect of our interim policy. During the interim period, we are not applying the proposed rule. Application of the rule would mean the dismissal of applications in conflict with it, in the absence of a meritorious petition for waiver. We do not propose such a procedure during the interim period. On the contrary, what we do propose is to designate for hearing applications concerning which we do not feel able to make a finding that a grant would serve the public interest. This procedure is required by the Communications Act. Section 309 of the Act provides for a grant only where the Commission can find that a grant will serve the public interest. Under Section 309(e), if the Commission for any reason is unable to make that finding, it is required to designate the application for hearing. Our

7/ By WLAC-TV, Inc.; Meredith Broadcasting Company; and by 96 television stations which filed a joint petition.

interim policy is necessary to prevent the compounding of situations which we believe may be contrary to the public interest. In this situation, we could not justify making grants without hearing.

24. The policy has a valid basis, and is not arbitrary or capricious. In the Public Notice, after setting forth facts concerning multiple ownership in recent years, we mentioned that the trend toward concentration in the VHF service was sufficiently serious to require the immediate adoption of an interim policy. Petitioners allege that there is no evidence that this trend has had a deleterious effect with regard to the ultimate goals of the multiple ownership rules. The preceding discussion gives in greater detail the basis of our concern and, in our opinion, shows a need for the policy adopted. They also controvert the contention that the interim policy will inhibit rather than promote the Commission's objectives of fostering competition and diversity of programming.

25. Authority for the adoption of the proposed amendments is contained in 4(i) and (j) and 303 of the Communications Act of 1934, as amended.

26. Pursuant to applicable procedures set out in Section 1.415 of the Commission's rules, interested parties may file on or before October 1, 1965 and reply comments on or before November 1, 1965. All relevant and timely comments and reply comments will be considered by the Commission before final action is taken in this proceeding. In reaching its decision in this proceeding, the Commission may also take into account other relevant information before it, in addition to the specific comments invited by this Notice.

27. In accordance with the provisions of Section 1.419 of the rules, an original and 14 copies of all comments, replies, pleadings, briefs, and other documents shall be furnished the Commission.

28. In view of the discussion appearing in paragraphs above, IT IS ORDERED, That the petitions for reconsideration named in footnote 7, above, ARE GRANTED, insofar as they are consistent with the action taken in the Public Notice adopted today, and in other respects ARE DENIED. IT IS FURTHER ORDERED, That said petitions will be filed in the present Docket No. 16068 to be considered as comments herein, without prejudice, however, to the filing of other comments, and of reply comments, in accordance with the provisions of paragraphs 26 and 27 above.

FEDERAL COMMUNICATIONS COMMISSION *

Attachment: Appendix

Ben F. Waple
Secretary

Adopted: June 21, 1965

Released: June 21, 1965

*See dissenting statement of Commissioner Hyde (To be issued at a later date). See attached dissenting statement of Commissioner Lee.

APPENDIX

It is proposed to amend § 73.636(a)(2) and to add a new Note 5 at the end of the section to read as follows:

§ 73.636 Multiple ownership.

(a) * * *

* * * * *

(2) Such party, or any stockholder, officer or director of such party, directly or indirectly owns, operates, controls, or has any interest in, or is an officer or director of any other television broadcast station if the grant of such license would result in a concentration of control of television broadcasting in a manner inconsistent with public interest, convenience, or necessity. In determining whether there is such a concentration of control, consideration will be given to the facts of each case with particular reference to such factors as the size, extent and location of area served, the number of people served, and the extent of other competitive service to the areas in question. The Commission, however, will in any event consider that there would be such a concentration of control contrary to the public interest, convenience or necessity for any party or any of its stockholders, officers, or directors to have a direct or indirect interest in, or be stockholders, officers, or directors of any of the following:

(i) More than seven television broadcast stations, no more than five of which may be in the VHF band.

(ii) More than three television broadcast stations or more than two VHF television broadcast stations in the fifty largest television markets. The market size will be determined by the ranking of the American Research Bureau, on the basis of net weekly circulation for the most recent year. Any party believing that the ranking describes his particular circumstances inaccurately, or wishing to suggest another ranking, may do so and such suggestions will be considered on their merits.

* * * * *

NOTE 5: Paragraph (a) (2) of this section will not be applied so as to require divestiture, by any licensee, of broadcast facilities owned prior to   , 1965. That paragraph will not apply to applications for assignment of license or transfer of control filed in accordance with §§ 1.540(b) or 1.541(b) of this chapter, or to applications for assignment of license or transfer of control to heirs or legatees by will or intestacy if the assignment or transfer to the heirs or legatees does not create interests proscribed by the paragraph. Paragraph (a) (2) will apply to all applications for new stations, and to all other applications for assignment or transfer. Commonly owned stations or stations prohibited by paragraph (a) (2) may not be assigned or transferred to a single person, group, or entity except as provided in this Note.

DISSENTING STATEMENT OF COMMISSIONER ROBERT E. LEE

On June 17, 1964, I recommended to the Commission that it adopt a Notice of Inquiry "... to ascertain viewpoints of the industry and the general public as to what possible changes should be made in the multiple ownership rules to foster the full development of UHF broadcasting without incurring undue concentration of control in this media and undue adverse impact to UHF broadcasters ...". My recommendation was aimed at a relaxation of our multiple ownership rules in order to give added impetus to UHF broadcasting. My view was and still is that the economic foundations of VHF broadcasting in the major markets are sufficiently firm to ensure a flow of new capital into UHF operations in those markets, if permitted to do so by our rules, and that the public would be the principal beneficiary.

It seems ironic that exactly one year later, the Commission, by rulemaking, is proposing to adopt rules that would, in my opinion, result in a substantial deterrent to the further development of UHF in the major markets and elsewhere for many years to come.

Expansion of television by the establishment of UHF stations should be encouraged. It certainly should not be stifled. On September 17, 1954, the Commission amended its multiple ownership rules to increase the maximum permissible ownership of TV stations by the same interests from 5 to 7 provided at least two were in the UHF band. In reporting this change in the rule to Congress the Commission said: "This is intended to encourage interests with program know-how and resources, but not previously eligible for additional TV grants, to enter the UHF field." Annual Report of the FCC for Fiscal Year 1954, p. 91.

In my opinion a Notice such as this should have as its purpose the gathering of all available facts so that thereafter, on the basis of such facts, the Commission could propose such rules as might be considered necessary to protect the public interest. Instead, the outcome of this inquiry seems fairly well assured by proposing specific rules in advance of ascertaining the facts and by enforcing such rules immediately by the simple expedient of following an "interim policy" until such time as the proposed rules can be made final.

Since I cannot now agree with the proposed new rules, I would immediately rescind the previously issued statement of interim policy (29 F.R. 18399) and would follow our present rules until they are changed by proper proceedings. In other words, I do not believe that we should have an "interim policy" that says, in effect, that the Commission will immediately enforce the proposed new rules throughout the time that will be needed to make a determination of whether such new rules should or should not be adopted.

Although I appreciate the concern of the Commission at the appearance of concentration of ownership of stations especially in the VHF portion of the spectrum, I am not unmindful of the fact that each multiple owner is engaged in sharp competition with other owners, multiple or otherwise, in all of the major markets.

Evil is not automatically present in bigness nor is there always virtue in smallness. At any rate, if evil is deemed present with respect to ownership of television stations (whether VHF or UHF) in the top fifty markets to the point where no further multiple owners will be permitted in those markets, then the barn door will have been effectively locked to protect the present multiple owners against all further competition except from such single station owners that have the know-how and the financial resources to enter the UHF field.

Even a casual examination of the top markets will indicate the very few stations, if any, that are likely to be sold in the foreseeable future. Thus, I believe the most urgent problem before the Commission with respect to TV station ownership is the continuing development of stations in the UHF band inherent in which is the creation of a favorable climate for a fourth commercial network. This is done by inducing capital to UHF station ownership in the top markets. The Notice offers no such inducement.

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D. C. 20554

70013
PUBLIC NOTICE - B
June 24, 1965

DISSENTING STATEMENT OF COMMISSIONER ROSEL H. HYDE
ON TV MULTIPLE OWNERSHIP PROCEDURES IN DOCKET 16068

Commissioner Rosel H. Hyde issued the attached dissenting statement to the Notice of Proposed Rule Making and Memorandum Opinion and Order in the TV multiple ownership proceeding (Docket 16068) released by the Commission on June 21 with notation that his dissenting statement would be issued later.

\- FCC -

Attachment

DISSENTING STATEMENT OF COMMISSIONER ROSEL H. HYDE

I dissent to the Notice of Proposed Rule Making and Memorandum Opinion and Order in Docket No. 16068 and to the related notice of Interim Policy Concerning Acquisition of Broadcast Stations.

Since the two notices look toward further proceedings, I am concerned in this statement with the procedures employed and with matters which may be helpful to development of a record upon which proper disposition can be made of the rule making proceedings.

The "Interim Policy" is what its caption says it is -- "Policy." Under the conditions in which it is employed it operates as basic substantive policy. Adoption of it without notice and an opportunity for interested persons to submit comment was contrary to the intent and purpose of the Administrative Procedure Act, Sec. 4.

The Notice of Proposed Rule Making is not based upon an adequate investigation or study of the matter. There has been no study of economic considerations; there has been no attention given to any effect changes in ownership may have had on competition or service. There is nothing to indicate that application of the proposed rules will conduce to more effective competition. It appears, as a matter of fact, that application of the rules will tend to protect substantial interests against increased competition or changes in the competitive situation.

I believe that the allegations of the notice of concentration of ownership are deceptive. The statistics relied upon do not show stations being removed from competition by transfer; nor do they show a trend toward concentration in the same market. Some enterprises limited by Commission rules as to the number of units they may operate, have sought opportunities for growth in larger markets. I do not find this to be evil. If we are interested in a healthy private enterprise system we should not regulate against characteristics which give private enterprise its best qualities.

I think the proposed rules are deceptive in another important respect. They appear to be prospective and not to look toward the dissolution of existing enterprises. However, if adopted, they would commit the Commission to theories which would be incompatible with the present structure. Since operating units of the structure must be re-examined from license period to license period, it is obvious that they will face tests against the proposed new policy at each renewal date. They may also face the challenge of competing applications designed to capitalize on the situation.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC 68-135
11378

In the Matter of	)	
	)	
Amendment of Section 73.636(a) of	)	
the Commission's Rules relating to	)	Docket No. 16068
Multiple Ownership of Television	)	
Broadcast Stations.	)	

REPORT AND ORDER

Adopted February 7, 1968 ; Released February 9, 1968

By the Commission: Commissioners Bartley, Cox and Johnson dissenting and issuing statements; Commissioner Loevinger concurring and issuing a statement in which Commissioner Wadsworth joins.

1. The twofold purpose of the Commission's multiple ownership rules is to promote maximum competition among broadcasters and the greatest possible diversity of programming sources and viewpoints. The rules appear in Sections 73.35, 73.240, and 73.636. These sections govern multiple ownership of stations in the standard, FM, and television broadcast services respectively. Each section is divided into two main parts: (1) the so-called "duopoly" or "overlap" portion which provides limitations on the common ownership or control of broadcast stations in the same broadcast service which serve substantially the same area, and (2) the "concentration of control" portion which proscribes the grant of a license for an AM, FM, or TV station to any party if the grant "would result in concentration of control" in the particular broadcast service "in a manner inconsistent with public interest, convenience or necessity."

2. The concentration of control part sets forth a number of specific factors that will be considered by the Commission in determining whether a particular grant would result in a concentration of control contrary to the public interest. In this regard, the AM and FM rules state:

> "In determining whether there is such a concentration of control, consideration will be given to the facts of each case with particular reference to such factors as the size, extent and location of areas served, the number of people served, classes of stations involved and the extent of other competitive service to the areas in question."

The TV rule uses the identical language except for the absence of the words "classes of stations involved."

3. The concentration of control portions go on to state that although the aforementioned factors will be considered in determining whether the grant of a license would result in undue concentration of control, in any event such

a concentration will be deemed to exist if the grant would result in a party's having an interest in more than a specified maximum number of stations in each service. That maximum is seven AM stations, seven FM stations, and seven TV stations, no more than five of which may be VHF.

4. The present proceeding deals with a proposed amendment to the concentration of control portion of the multiple ownership rule pertaining to television broadcast stations (Section 73.636(a)(2)).

5. In a Public Notice issued December 18, 1964 (FCC 64-1171, 29 F.R. 18399, 3 Pike & Fischer, R.R. 2d 909), the Commission, citing figures, expressed its concern over the marked increase in multiple ownership of television stations in recent years, especially of VHF stations in the largest markets where the number of viewers is greatest and where diversity of interests and viewpoints should be maximized. Pending further study of the matter it announced an interim policy as follows:

> "Absent a compelling affirmative showing, we will designate for hearing any application filed after December 18, 1964 for the acquisition of a VHF station in one of the top 50 television markets, if the applicant or any party thereto already owns or has interests in one or more VHF stations in the top 50 markets; we shall treat likewise any application to acquire interests in two or more VHF stations in these markets if the applicant now has no interests in VHF stations in these 50 markets. We are adopting this policy because, under presently existing circumstances, we cannot normally make the required finding that grant of an application for a second VHF station in the top 50 markets will serve the public interest without giving the proposal the detailed scrutiny of a hearing."

6. Subsequently, on June 21, 1965, after further study of the matter, the Commission released a Notice of Proposed Rule Making and Memorandum Opinion and Order in the instant docket (FCC 65-547, 30 F.R. 8166, 5 Pike & Fischer, R.R. 2d 1609) which proposed adoption of an amendment to the concentration of control portion of the TV multiple ownership rule which provided for ownership of not more than three TV stations or more than two VHF stations in the top fifty television markets.

7. At the same time, the Commission terminated the interim policy expressed in the December 18 Public Notice and substituted therefor a new interim policy as follows:

"Absent a compelling affirmative showing to the contrary, we will designate for hearing any application filed after June 21, 1965, for a new television station, assignment of license, or transfer of control, the grant of which would result in the applicant or any party thereto having interests in violation of those set forth in proposed Section 73.636(a)(2)(ii) in the attached Appendix /the Appendix referred to is the same as the Appendix attached hereto and mentioned at the end of paragraph 6 above/. Divestiture will not be required, but commonly owned stations in excess of the number set forth in the proposed rule which are proposed to be assigned or transferred to a single person, group, or entity will be designated for hearing. However, no hearing will be designated in any of the foregoing situations which involve applications for assignment or transfer of control filed in accordance with Sections 1.540(b) or 1.541(b) of the Commission's rules, or applications for assignment or transfer of control to heirs or legatees by will or intestacy if the assignment or transfer does not create common interests which would be proscribed by the above-mentioned section in the attached Appendix."

The new interim policy was published in a Public Notice released on June 21, 1965 (FCC 65-548, 30 F.R. 8173, 5 Pike & Fischer, R.R. 2d 271), the same date on which the Notice of Proposed Rule Making and Memorandum Opinon and Order was released in this proceeding. The latter document, in addition to proposing an amendment of Section 73.636 of the Rules, disposed of petitions for reconsideration of the December 18 interim policy.

8. The Commission now has before it for consideration comments filed in response to the Notice herein. It also has under consideration the petitions for reconsideration mentioned in the previous paragraph which the notice announced would be considered as comments herein without prejudice to the filing of other comments by the parties who had filed petitions for reconsideration. 1/

1/ Comments were filed by the following parties: American Broadcasting Companies, Inc., Columbia Broadcasting System, Inc., National Broadcasting Company, Inc., General Electric Broadcasting Company, Inc., Metromedia, Inc., Newhouse Broadcasting Corporation, Plains Television Corporation, Springfield Television Broadcasting Corporation., Storer Broadcasting Company, ten television stations (filing jointly), Westinghouse Broadcasting Company, Inc., and the Council for Television Development (more than 100 television stations). The comments for the Council included a research report by United Research, Incorporated, an independent research organization. In addition, relevant comments were considered from the following: Petition for Reconsideration filed by Meredith Broadcasting Company; Petition by Ninety-nine Television Stations for Relief from the "Interim Policy" of December 18, 1964; Petition of the Council for Television Development for Relief of the "Interim Policy" of June 21, 1965; and Petition to Rescind by WLAC-TV, Inc.

9. The notice, after having presented statistics showing that there is an apparent trend toward more VHF stations coming under group ownership in the largest markets and a corresponding decline in the number of single-station owners, stated that the Commission was concerned that under the present limitation of five VHF stations per owner there might be a continuation of the trend. It also expressed concern that the future growth of UHF--which has its greatest immediate potential in the largest markets--might follow the VHF pattern. The proposed rule was designed to counter the apparent VHF trend and to prevent the development of a similar trend in UHF. 2/

10. The Notice of Proposed Rule Making (para. 19) asked that parties focus their comments

> "upon the question of need for the changed rules and the appropriateness of the specific rule proposed. In arguing need, or lack of need, for a new rule, parties may submit programming showings in a manner which seeks to demonstrate that the programming was made possible solely by virtue of a multiple ownership situation which could not arise under the proposed rule. Parties opposing the proposed rule should concentrate primarily upon the question of public benefits which may be ascribed to multiple ownership in excess of the level proposed herein. In short, the issue posed is not as between multiple ownership and single ownership, but as between the present level and a more limited degree of such ownership."

11. Elsewhere in the Notice (paras. 16-18) comments were requested on six specific questions, as follows:

> "Is the existing ownership limit, the one proposed here, or some other regulation, best suited to present circumstances?
>
> "Whether or not the present list of evidentiary factors /in Sec. 73.636/ should be expanded to include other factors, such as the overall effect on a local competitive situation of an added multiple owner, the nature of any distinctive program service a multiple owner may seek to offer, etc.

2/ Paragraph 11 of the Notice explains why the top 50 market concept was chosen:

> The Top-Fifty-Market Concept. We are proposing the 50-market cutoff for three reasons. These are (a) the substantial degree of ownership concentration reached in these markets; (b) the high proportion of the total population resident in these areas and consequently the very large audiences reached by the individual VHF stations; and (c) the availability of ample economic support for individual, local ownership of both VHF and UHF stations in these markets.

"Is multiple ownership necessary for a licensee to undertake program production in competition with networks and other program suppliers? If so, what degree of multiple ownership is necessary?

"Will the proposed rule have any effect on the possibilities for establishment of a fourth television network?

"Is there any necessary correlation between a licensee's ability to present 'quality' programming and multiple ownership? If there is any such correlation, is it strong enough to outweigh the strong policy considerations favoring the widest possible diversity of ownership?

"Given the fact that we propose no compulsory divestiture of existing stations, what long-term increase in diversity of ownership may the proposed rules be expected to accomplish? More specifically, what increases in the number of individual owners in the top fifty markets may be expected as a result of assignments and transfers and the growth of UHF?"

12. The Commission has studied all of the comments filed. Only one--filed by Springfield Television Broadcasting Corporation--expressed the view that there was an undue concentration of control in television broadcasting. However, Springfield believes that the proposed rule would be ineffective without the further requirement of divestiture. All other parties expressed the view that there was no undue concentration of control and opposed the proposed rule.

13. We have of course arrived at a decision in this matter upon the basis of our examination of the comments and our continuing experience in the broadcast field. Based thereon, we are of the opinion that the proposed rule should not be adopted and that the proceeding should be terminated.

14. First, we note that since the institution of the instant rule making proceeding many new UHF stations have been activated in the major markets. This has lowered the previous degree of concentration of station ownership in these markets and the development of UHF is providing as many separate owners and separate viewpoints as would have occured with a more restrictive multiple ownership rule in the absence of these stations. 3/

3/ Since the end of 1964 when we first adopted an interim policy limiting ownership in the larger markets, there has been a sharp increase in UHF activity in these markets. The number of UHF stations in operation has doubled--today there are 39 commercial UHF stations on the air as compared with 20 at the end of 1964. In addition, there are presently 67 outstanding construction permits for UHF stations in the top 50 markets as compared with 38 at the end of 1964. These are additional actual and potential voices in these markets beyond the 157 VHF stations.

Equally important, it is observed that insofar as UHF stations are concerned, an absence of the type of restriction proposed in the rule herein may well serve to make for a more rapid development of such stations and enhance the chances for development of a fourth commercial TV network. It would significantly contribute to the entry of persons who have the know-how and the financial resources to enter into and carry on UHF television broadcasting during this most crucial period. 4/ Indeed, this consideration of possible benefits to television service through entry of the multiple areas, although not as critical as in the UHF area, is also relevant to the public interest judgment to be made in this field with respect to VHF operation.

15. We have determined that the proposed modification of our rules should not be adopted, and that the problem of concentration in the top 50 markets should continue to be dealt with upon the basis of case-by-case consideration within the standards of the present multiple ownership rules. While there are of course the benefits of predictability in the adoption of a specific limit for the 50 largest markets, we believe that the greater flexibility permitted by an ad hoc approach is preferable. We already have a standard in the rules limiting total ownership and control by any one party, and will continue carefully to scrutinize every acquisition, whether in the top 50 markets or in other communities, to prevent undue concentration.

16. Thus, ". . .the fundamental purpose of this facet of the multiple ownership rules is to promote diversification of program and service viewpoints as well as to prevent any undue concentration of economic power contrary to the public interest. . . (para. 10, Report and Order on Multiple Ownership, Docket No. 8967, 18 F.C.C. 288, 291-2, 9 Pike & Fischer, R.R. 1563, 1568 (1953)). Under Section 310(b) of the Communications Act, every applicant is therefore required to establish that a grant of its application would serve the public interest, taking into account the benefits and any detriments involving undue concentration.

17. In particular, in light of the special problems concerning the top 50 markets set forth in the Notice of Proposed Rule Making herein, we will expect a compelling public interest showing by those seeking to acquire more than three stations (or more than two VHF stations) in those markets. The compelling showing should be directed to the critical statutory requirement of demonstrating, with full specifics, how the public interest would be served by a grant of the application--that is, the benefits in detail that are relied upon to overcome the detriment with respect to the policy of diversifying the sources of mass media communications to the public. However, within the total limits now contained in the rules, we believe the ad hoc approach will better enable us to deal with particular situations in

4/ We note that during 1966 in the top 50 markets there were 29 UHF stations on the air (excluding WHCT, the pay TV station at Hartford, Connecticut, and KSAN-TV, in San Francisco, California, which is a satellite with no revenues). Of these, 8 were profitable and 21 operated at a loss. The total revenues for the 29 stations were $13,326,696 and the overall loss was $9,667, 281.

particular communities than would a new fixed limit. Our conclusion in this respect is further reinforced by the present critical phase of UHF development and the need to have the flexibility to take action which on balance promotes the public interest in this vital area upon which the Congress and the American people, through purchase of all-channel receiver sets, have staked so much.

18. In the Notice (para. 20) we stated that oral argument would be held in this matter after comments had been received, because such argument would be appropriate and helpful. However, in view of the comments filed it is obvious that there will not be conflicting points of view presented in oral argument and that it would therefore serve no useful purpose. Accordingly, we dispense with such argument.

19. In view of the foregoing, IT IS ORDERED, That the interim policy set forth in the Public Notice of June 21, 1965, IS TERMINATED.

20. IT IS FURTHER ORDERED, That the rule proposed in the Notice of Proposed Rule Making and Memorandum Opinion and Order released June 21, 1965, in this proceeding IS NOT ADOPTED and this proceeding IS TERMINATED.

FEDERAL COMMUNICATIONS COMMISSION*

Ben F. Waple
Secretary

Attachment

*See attached dissenting statements of Commissioners Bartley and Johnson.
See attached concurring statement of Commissioner Loevinger in which Commissioner Wadsworth joins.
Dissenting statement of Commissioner Cox to be released at a later date.

DISSENTING STATEMENT OF COMMISSIONER ROBERT T. BARTLEY

It seems strange indeed that a bare majority of this Commission will, after admitting that the comments filed offered "very little . . . in response to the specific questions raised," insist on terminating this highly significant proceeding without benefit of the oral argument provided for therein. Does the majority feel that it would be less informed after oral argument?

"Top Fifty" Markets Station Ownership

[In re Amendment of Section 73.636(a) . . . .]

Dissenting Opinion of Commissioner Nicholas Johnson

Few issues before this Commission have greater impact on the American people than who is to control the radio and television stations of this nation.

I dissent to the majority's termination of the Commission's only proceeding dealing with multiple station ownership and its implications for a free society. I also disagree with the "return" to ad hoc consideration--another way of saying case-by-case avoidance of these most significant issues.

The majority is terminating this three-year-old proceeding with nothing to show for its efforts, except complacent acquiescence in matters as we find them--the status quo, sometimes defined as "the mess we're in now."

In discussing the proposed rule, it should be clear what very significant questions of broadcast ownership are not being addressed.

We are not concerned here with the ownership of broadcast properties by companies engaged in non-broadcast activities--problems which were suggested in the ITT-ABC merger.

We are not concerned with the problems of cross-ownership of communications media--the joint ownership of newspapers, magazines, programming sources and networks, cable television systems, book publishers and broadcast stations.

We are not concerned directly with the ownership of broadcast properties (or other communications media) in a single market or region. (The Commission's rules prohibit ownership of stations with overlapping signals--the so-called "duopoly rule.")

In December of 1964 the Commission issued an interim policy indicating that applications for acquisition of VHF stations in the Top-50 markets would be designated for hearing if the result would be that one owner would have more than one VHF station in such markets.

The majority said:

> "We do not believe that this degree of multiple ownership concentration in the largest population centers is desirable. While we do not now propose a divestiture of existing interests, we have determined that the trend toward concentration in the VHF service is sufficiently serious to require the immediate adoption of an interim policy."

3 P & F Radio Reg. 2d 910-911 (1964). And in June of 1965 rulemaking was begun to bar the prospective acquisition of more than three television stations in the top-fifty markets (no more than two of which could be VHF's).

In the notice of rulemaking the Commission majority said:

> "It is axiomatic that American industry generally should be effectively competitive and that undue

> concentrations of power should be avoided . . . .
> Basic competitive principles are particularly
> important in the licensing of broadcast stations:
> First, because we are dealing with the most influential of all communications media; and second,
> because we are required for technical reasons to
> limit and control entry into the broadcast field."

5 P & F Radio Reg. 2d 1611 (1965). And even today the majority notes that: "The twofold purpose of the Commission's multiple ownership rules is to promote maximum competition among broadcasters and the greatest possible diversity of programming sources and viewpoints." paragraph 1. With this consistent set of statements and a factual situation that has, if anything, become worse over the past three and one-half years, it is hard to understand why the majority abruptly ends these proceedings.

The most valuable television stations in America today are those in the top-fifty markets, and they are increasingly owned, not by local residents, but by large, often publicly-held, conglomerate industrial enterprises. These are the television stations that sell for $10 to $20 million each, and that attract commensurate annual advertising revenues. Each has within its signal area between 1.5 and 20 million viewers. Thus, three stations in such markets would enable the owner to reach as many as 40 million persons; seven stations could reach 90 million.

The television industry earns an average 100% annual return on investment in tangible property. These near-monopoly profits are made possible through the use of public property--spectrum space. No individual is entitled, as a matter of legal or moral right, to more than one piece of such rich pie. Our commission of office does not impose upon us the obligation to serve such private interests; we have sworn to serve "the public interest."

This Commission has long purported to start from the premises that diversity of control of broadcasting and local ownership of broadcast properties are desirable. Thus, the question before us ought to be, "How is the public's interest served by having a non-resident, corporate, multiple owner control one of the major sources of news, opinion and entertainment for a city of millions?" We have not addressed that question.

These questions are important. As Congressman John Dingell has said recently:

> "Clearly the Commission had a congressional mandate to take a strong stand against common ownership of broadcast facilities. For the history of the Communications Act of 1934 reveals unequivocably that local control and management, that diversity of ownership were paramount considerations when this legislation was enacted."

114 Cong. Rec. H389-390 (daily ed. Jan. 25, 1968).

It is sometimes urged that a multiple owner may be the only entity willing to undertake operation of a local radio or television station. But for the multiple owner, it is argued, the community will have no programming service at all. But that argument can scarcely be made in communities with the financial strength of the largest metropolitan areas in this country.

The majority offers no arguments why multiple ownership should be encouraged as _serving_ the public interest. It only points to two reasons why the proposed rule should _not_ be adopted: UHF development might be impeded and establishment of a fourth network might be hindered. However, even if the potential good from the rule could be counterbalanced by such potential harm there is little _evidence_ that either effect would result from adoption of this proposed rule. In its footnote 3 the majority says: "Since the end of 1964 when we first adopted an interim policy limiting ownership in the larger markets, there has been a sharp increase in UHF activity in these markets." This scarcely supports the view that the policy has been inhibiting to UHF growth. And in footnote 4 the majority notes that of the 29 UHF stations in these markets, 21 operated at a loss in 1966--which may suggest that UHF entry in these markets is growing about as fast as it can. In any event, there is little evidence that multiple owners enter UHF faster than anyone else. The hoped-for fourth network is merely a part of the majority's goal of improvement in growth of UHF. There is no evidence that group ownership would increase the chances for that network. The last to try (Overmyer) recently disposed of his construction permits. And although some multiple owners in these markets do a significant amount of independent programming today, they are few.

The majority's reliance on the shibboleth "benefit to UHF" is not unusual. This Commission has hung so many decisions on the UHF peg that one wonders if the day will come when the whole hatrack will come tumbling down from its own weight. Restrictive CATV rules are to benefit UHF. Increased consumer costs of all-channel sets are to benefit UHF. Large chunks of spectrum are denied to other potential users in order to benefit UHF. The ITT-ABC merger was justified, in part, as a benefit to UHF. And now the demise of the top-fifty rule will hopefully benefit UHF. It is almost a knee-jerk reaction.

As a substitute for further consideration the majority offers a continuation of the interim policy:

> "In light of the special problems concerning the top 50 markets set forth in the Notice of Proposed Rule-making herein, we will expect a compelling public interest showing by those seeking to acquire more than three stations (or more than two VHF stations) in those markets."

paragraph 18. This is the same "compelling public interest showing" that a Commission majority has so far found to justify waiving the hearing requirement in every case brought to the Commission under the previous interim policy. Thus a majority found that a compelling public interest showing for doing violence to the rule was made when WGN of Colorado, Inc., acquired a VHF in Denver, Colorado; WKY Television Systems acquired a UHF in Milwaukee, Wisconsin; Storer acquired a UHF in Boston, Massachusetts; Kaiser acquired a UHF in the Boston, Massachusetts, market; Capital Cities sold a VHF station in Providence, Rhode Island, and acquired a VHF in Houston, Texas; Kaiser acquired a UHF in Cleveland, Ohio; Baldwin-Montrose Chemical Company acquired VHF's in Minneapolis, Minnesota, Los Angeles, California, and Portland, Oregon; the Newhouse communications group acquired a minority interest in a UHF in Denver, Colorado; American Viscose acquired six UHF's in top-fifty markets; and ITT was to have acquired VHF's in New York, Chicago, Los Angeles, Detroit, and San Francisco. In each case the interim policy required a "compelling public interest showing." Past experience indicates that this "requirement" is demonstrably meaningless. The Commission's policy with regard to multiple ownership will be what is now in its rules, and no *ad hoc* determinations will tighten those standards. Seven AM's, seven FM's and seven TV stations, of which five can be VHF's--so long as no signals overlap--can be acquired by any multiple owner regardless of how many millions of Americans he influences.

It also seems strange to me that the majority would express its lack of interest in ownership questions at the very time others in government are evidencing renewed interest. The Special Investigations Subcommittee of the House Interstate and Foreign Commerce Committee recently held hearings on one of the transfer cases where the majority found that a "compelling public interest showing" had been made. The Department of Justice intervened in the ITT-ABC merger on grounds that the merger was anti-competitive. In any case, it seems irresponsible for the FCC at anytime to refuse to consider the problems on anything more than an ad hoc basis.

Within the past two weeks we have been asked a number of questions about our ownership rules and practices by the Chairman of the House Committee on Interstate and Foreign Commerce, Mr. Staggers. Included are:

> "What studies has the Commission made to determine whether group ownership of broadcasting licenses enhances competition? Is it in the public interest to encourage group ownership of UHF stations? Is it in the public interest to encourage a network of UHF stations? If so, what competitive protection would be afforded non-network UHF licensees? Has the Commission determined that multiple ownership is a solution to the high cost of originating TV programs?

> If so, submit a copy of its pronouncements supporting such a determination. Has the Commission determined that a single, independent UHF station cannot produce worthwhile TV programs in competition with local network affiliated or independent VHF licensees?"

I believe these questions are deserving of better than the brush-off represented by the Commission's action today.

There are several immediate steps the Commission could take to further its understanding of multiple ownership problems. We ought to hold oral argument in this case, with elements of the staff instructed to participate and put forward the strongest case possible for the rule--and to subject the position of those who have commented to searching scrutiny. I think that much might be learned by such an adversary proceeding. The Commission's standard for ownership structure is "maximum competition" and "greatest possible diversity." One of the questions raised in this proceeding is what the public gets in return for permitting one owner to acquire a number of profitable properties--in contrast to promoting "maximum diversity" by limiting multiple ownership. Hopefully, all would acknowledge that the economic self interest of the multiple owners--clearly powerful spokesmen within the broadcasting establishment--are not, alone, the equivalent of a "public interest" basis for our present course. The majority, of course, says nothing about whether multiple owners presently provide better programming, competition to networks, support for UHF, or any other substantial public benefits. The evidence presented in the written record of this proceeding is, at best, mixed.

As is often the case when the Commission is making seat-of-the-pants judgments, the Commission refers to its "continuing experience in the broadcast field--sometimes referred to as "accumulating insight." This is the ultimate justification for whatever we do. I would be more confident in the Commission's exercise of that judgment if I thought it were really committed to confronting the implications of media ownership that are woven into the very fabric of the society our government was established to preserve. An oral hearing on this matter would be a slight step in that direction. I regret our inability to take it.

CONCURRING OPINION OF COMMISSIONER LEE LOEVINGER
REGARDING MULTIPLE OWNERSHIP OF TELEVISION STATIONS
IN WHICH COMMISSIONER JAMES J. WADSWORTH JOINS

The issue before the Commission now is whether to impose a new rule limiting the number of television stations which any single licensee may acquire in the top 50 markets to three, no more than two of which may be VHF stations. It is not proposed to divest the holdings of any licensee now having more than that number of stations, as permitted under present rules, but the proposed rule would prohibit any other licensee from acquiring more than the specified number of television stations.

The Commission has long been concerned with multiple ownership in the broadcasting field, and for many years has sought to prevent concentration of control of broadcasting facilities. The first formal Commission proceeding in this field was 30 years ago, in 1938, when the Commission initiated the Chain Broadcasting Investigation. This culminated in a report in 1941 which found that the networks then in operation (NBC and CBS radio networks) impeded competition, stated that no additional licenses would be granted the networks, and held that the networks would be required to divest stations where they owned more than one AM station in a market. However, no specific numerical limitation was put on station ownership.

The first FCC rule specifically limiting multiple ownership was adopted by the Commission on June 21, 1940, when it prohibited ownership by one person of two or more FM stations with overlapping service areas, and, in effect, limited any licensee to six FM stations.

On April 30, 1941, the Commission adopted a rule limiting television station ownership to three for a single licensee. In 1944 NBC, which had three television licenses, petitioned for amendment of the rule and pleaded that a larger number of stations was necessary to permit the development of television networks and national programs. On May 16, 1944, the Commission amended its rules to permit one licensee to hold five television licenses.

On November 23, 1943 the Commission adopted a rule prohibiting the common ownership of AM stations with overlapping service areas, but not limiting the number of stations that might be owned by a single licensee.

In 1948 the Commission instituted a rulemaking proceeding which proposed a rule limiting one licensee to the ownership of 7 AM, 6 FM and 5 TV stations. There were extensive comments and intensive staff study and analysis. The possibility of differentiating between VHF and UHF, as well as numerous other kinds of limitations were all considered. On November 7, 1953, the Commission adopted a Report and Order which established a limitation of 7 AM, 7 FM and 5 TV licenses which might be held by one person. 9 RR 1563 (1953). On September 17, 1954, the Commission amended the rules to permit the ownership by a single licensee of 7 TV stations of which no more than 5 might be VHF. 11 RR 1519 (1954). At the time of adopting this last amendment, the Commission considered a wide range of proposals for limiting television holdings, including limitations based on population, area or region, differentiation between VHF and UHF, and other possibilities. The Commission stated that the 1954 amendment was adopted in order to promote the development of UHF and because a nationwide system of broadcasting requires some multiple ownership of stations. The rules as amended in 1954 have remained in effect without change as to the limits of ownership. (Cf. Multiple Ownership Rules, 2 RR2d 1588 (1964), 3 RR2d 1554, 1637 (1964).

On December 18, 1964, the Commission issued a public notice stating that in recent years "there has been a marked increase in the extent of multiple ownership, especially in television" and particularly in VHF. 3 RR2d 909 (1964). The Notice stated that the Commission was conducting an overall review of the problem of concentration and diversification and that, as an interim policy, it would designate for hearing any application for the acquisition of a VHF station in one of the top 50 television markets if the applicant owned one or more stations at the time of application, unless there was "a compelling affirmative showing." On June 21, 1965, the Commission adopted another public notice, modifying the interim policy and proposing a new rule on the subject. The proposed rule would prohibit acquisition of more than 3 television stations or more than 2 VHF television stations in the 50 largest television markets, as well as the long standing limitation of more than 7 television stations, of which no more than 5 are VHF, in any markets. 5 RR2d 271, 1609 (1965). The notice stated that the new interim policy of the Commission would be to require a hearing on any application for acquisition of a license which would result in any party having more licenses than would be permitted under the proposed rule, but that no divestiture of existing licensees was proposed. Voluminous comments and material having been submitted, nearly all in opposition to the proposed rule, and the Commission having had more than two years of experience and observation with the interim policy, the issue now before us is whether the proposed rule should be adopted.

There will probably be those who argue that any Commissioner who voted for the 1964 and 1965 notices must, to be consistent, vote for adoption of the proposed rule. The basic concern with multiple ownership and concentration of control remains, and the facts have not changed greatly since 1965. However, my position is that voting to propose a rule, or institute a rulemaking proceeding, does not involve any commitment as to the position to be taken on adoption of the rule. On the contrary, I believe, as I have often stated, that the Commission should institute rulemaking proceedings, gather evidence, consider arguments and make as full an analysis as possible before reaching any conclusion, rather than after it has decided. Although it has been argued that the Commission should exercise its judgment on the merits before proposing rulemaking (see dissenting statement of Commissioner Johnson, A. T. & T. etc., ___ FCC2d ___ (1968), FCC 68-73, 68-74), I emphatically reject that position. I believe that the spirit, and probably the letter of administrative due process, as well as basic principles of rational decision-making, require hearing and considering the evidence and the arguments before reaching a judgment rather than afterwards. While I still believe the present subject warranted re-examination and reconsideration after the passage of a decade since adoption of the multiple ownership rules, I do not consider myself bound or in any degree constrained by the institutional opinion which accompanied initiation of the present proceedings.

Thus I am compelled to make an analysis of the television market structure and the objectives which we seek to achieve within that market. There is no real dispute that our objectives are competition and diversity of ownership. The television market is a peculiarly complex one, not altogether analogous to the conventional industrial model. Competition in the television station market has at least three aspects: for advertising, for audience, and for product or programming. The three are interrelated as programs are the means of attracting audience, and advertisers seek those stations which have the largest audience. Competition for audience is altogether local as stations cannot, within the terms of their licenses, reach more than specified areas within relatively close range of their stations. Competition for advertising is both local and national. By and large network advertising simply goes to network affiliated stations, and there is little opportunity for competition between stations. There is competition for national non-network advertising in the several local markets, and there is competition among stations for local advertising. There is some competition for programs, but not very much. The great spectacular programs with much audience appeal are mostly national programs carried by the networks. There is competition among the networks for such programs, but individual stations are simply unable to compete in this field. What competition there is between stations with respect to programs is in the effort to produce or secure more attractive local or special programs.

The most obvious economic fact about television programming is that it is inordinately expensive. It is reported that an hour television network show costs about $200,000. Newsweek, Jan. 22, 1968, p. 94. The Ford Foundation has given the Public Broadcasting Laboratory $12,600,000 with which it will produce some 52 shows of about 2 hours each. This comes to a cost of over $240,000 pershow, and it is reported that the actual out-of-pocket expenses, exclusive of overhead, administration and similar costs, come to about $90,000 per show. Variety, Jan. 12, 1968, p. 17. ABC, the smallest of the three national television networks, has announced significant cutbacks in public affairs and other programming since it lost the financial support promised by its proposed merger with ITT. Within the last year an effort has been made to start a fourth national television network, which has failed financially with only one month of operations. Television markets are the metropolitan areas and so far there has been no indication that smaller communities can even support television stations. It is well known to the Commission that television costs are increasing. At the same time, the advertising revenue which supports television operations has apparently reached a plateau. National non-network advertising revenue, the largest single revenue source, was nearly 2% less in 1967 than in the previous year. Local advertising, which amounts to less than half of national in amount, increased only 1% during the same period. Broadcasting, Jan. 29, 1968, p. 40. These facts warn that we should carefully examine the probable economic consequences before undertaking to make any changes which might affect the ability of television stations to survive or compete.

The conventional wisdom of economic analysis and antitrust policy favors growth of enterprises through internal expansion, rather than through merger. Brown Shoe Co. v. United States, 370 US 294, 345, footnote 72 (1962). However, as a practical matter, there is no such possibility for television stations. The technical parameters of operation limit the range of reception, and these are fixed, as is the geographical location. Therefore, each station has a limited local market within which it can attract only a share of the audience determined in large part by the number of other stations assigned to that market by the Commission. The amount of advertising that any station can accept is likewise limited by the amount of time available. The Television Code of the National Association of Broadcasters establishes limits for the amount of commercial time any station may carry, and the Commission favors compliance with the Code. So television stations do not have the possibility of growth through internal expansion that is open to most other businesses.

In the television market, vertical integration means the expansion into program production. Most, if not all, television stations now engage in this activity to some extent; but the cost of program production constitutes an economic barrier to extensive activity of this kind by any enterprise without very large capital resources. The real problem is where the resources to engage in program production are to be secured.

Conglomerate merger with a large company outside the broadcasting field is not foreclosed by any FCC rules or precedents. But the nature of the opposition to the attempted merger by which ABC sought to strengthen its competitive position will certainly deter, and probably prevent, other potential merger partners from exposing themselves to similar attacks. Big business is notoriously, and rightly, reluctant to invite such attack, and small business would be small help in financing television program production.

Thus, as a practical matter, the only method of expansion (beyond the normal growth of the market itself) available to television stations is a kind of horizontal expansion by acquisition of or merger with stations in other local markets. This does not necessarily imply that there should be no check or limits on such expansion by television broadcasters. It does imply that limits on television expansion must be analyzed and examined within a different frame of reference than the one applied to ordinary unregulated markets.

Existing FCC rules do impose a very specific and rigid limit on the number of broadcasting licenses any licensee can hold. A single licensee can hold no more than 7 television licenses of which no more than 5 can be VHF, and no two of the licensed stations held by one licensee can be in the same market or have overlapping service areas. Thus each market is assured of as many separate television voices as there are television stations in that market under present rules. These rules have been in effect since 1954 so we have had an opportunity to observe what has happened under them. In fact, this proceeding was instituted because of Commission concern with what appeared to be a tendency toward increasing concentration in television station ownership in the top 50 markets in the period from 1956 to 1964. However, as comments in this proceeding have pointed out, the data cited in the Commission Notice were misleading because they purported to show concentration in the top 50 markets by statistics which included among "multiple owners" all licensees with one station in the top 50 markets and an interest in any other television station in any other market, whether it was in the top 50 markets or in some smaller market. Thus, the data on which the Commission originally acted analyzed the situation in the top 50 markets on the basis of statistics which related in part to those markets and in part to other markets. This is clearly an erroneous mode of analysis.

In any event, the objectives we are seeking in our concern with broadcasting economics are diversity and competition -- the number of separate voices speaking in each community or market. In this proceeding, for purposes of analysis and convenience, we have grouped the top 50 markets and consider them together. In this frame of reference our primary concern must be with numbers, rather than with ratios or percentages, and as we are dealing with relatively small numbers the ratios are likely to be misleading.

Based on the best available data I can obtain, which is in part from material filed in this proceeding and in part from FCC records, the following are the changes in television station ownership that have taken place in the top 50 markets since 1956.

Top 50 Television Markets: Changes in Ownership Interests 1956-1968

		1956		1968
(A)	Total number of authorized television stations has increased from	151	to	264
(B)	Number of VHF television stations has increased from	130		158
(C)	Total number of separate television station owners has increased from	104		163
(D)	Number of separate VHF station owners has increased slightly from	88		91
(E)	Total number of owners of single stations in the top 50 markets has increased from	78		125
(F)	Number of owners of single VHF stations in the top 50 markets has decreased very slightly from	65		63
(G)	Total number of multiple station owners has increased from	26		38
(H)	Number of multiple VHF station owners has increased slightly from	23		28

(I) The category "multiple station owners" includes all licensees owning 2 or more stations in the top 50 markets and is not by itself a measure of concentration.

In sum, during the last twelve years under the present rules, both the number of television stations and the number of station owners has increased substantially in the top 50 markets. The same development has taken place in all national broadcasting markets as a group, and in the field of radio as well as television. Without going into detail, from 1956 to 1968 the number of authorized television stations in the United States increased from under 600 to more than 1,000 (including VHF, UHF, commercial and educational stations), the number of AM stations increased from less than 3,000 to more than 4,200, and the number of FM stations increased from under 600 to approximately 2,400 (including educational stations).

The term "concentration," in economic or legal discourse, means the market share held by a limited number of the firms in any given market. While a variety of measures are used to indicate concentration, the most commonly used measure is the market share of the leading four firms in a market. Ratios based on other relatively small numbers are not uncommon, and some quite sophisticated methods of calculating concentration in a market have been suggested. See Michael O. Finkelstein and Richard M. Friedberg, The Application of an Entropy Theory of Concentration to the Clayton Act, 76 Yale L. J. 677 (March 1967). However, the term loses all significant meaning when it is used to refer to numbers and ratios of the size involved in the top 50 market analysis with which we are now concerned. By any generally accepted test, there has been no increase in concentration of television station ownership in the top 50 markets up to the present time. On the other hand, without attempting to impose some arbitrary mathematical test, it is self-evident from the figures cited above that in the top 50 markets there has been a very substantial increase in the numbers of television stations and in the numbers of separate enterprises -- in short, in the number of separate voices in the markets under examination here.

The point within the broadcasting field at which there is economic concentration is television network operation. There are only three national television networks. But it is as clear as anything can be in this uncertain field that there are only three television networks because there is inadequate advertising revenue, programming, and audience demand to provide economic support to more than three networks, if that many. It is a cliche in the television industry that this is still a two-and-a-half network economy. Current events are giving us an unfortunate demonstration of the truth of that cliche.

The most realistic hope for increasing the number of television networks and the number of substantial national program sources is to encourage the growth of more strong enterprises engaged in television station operation. The present multiple ownership rules are far more likely to do that than the proposed new rule.

Some of the difficulties in this field are suggested by the action of the President in asking and of the Congress in voting to establish the Corporation for Public Broadcasting, to provide another source of programs that will be socially and culturally beneficial to the country, even if not economically profitable. It would be inconsistent for the government to impose new and more stringent limitations on the development of private enterprise in television while at the same time establishing a corporation to use government funds for the purpose of providing programs which private enterprise is unable to provide economically, in part because of such limitations imposed by the government.

There is a maxim taught in medical schools that is relevant here. An axiom of medical practice is "Primum non nocere" -- first, and above all, do no harm. If you cannot help the patient, at least do not administer medication or treatment that will hurt him. It seems to me that this principle should be equally applicable in the field of regulatory action. Before we impose new rules we should be reasonably sure that they will improve the situation, or at least not make it any worse. With respect to achieving competition and diversity in television programming, the proposed rule appears likely to make matters worse rather than better.

As the data set out above demonstrate, there is no evidence of increasing concentration in television station ownership in the top 50 markets. On the contrary, there have been growing numbers of both stations and owners during the last twelve years under the present rules. We do know that there is concentration in television network operation and in the number of national television program sources. This is due in large part to the very large and increasing cost of television program production and distribution which precludes any but large and financially strong enterprises from engaging in such an undertaking. Accordingly, if we are to have any hope of developing new sources of television programming in the private sector we must permit the development of financially strong enterprises in the television field.

The proposed rule would impose no handicap on the present networks, or other large multiple owners, as they would not be divested of their present station holdings. The proposed rule would prevent any new enterprise from acquiring as many stations as the networks now have and it would break up multiple holdings in the event that any licensee undertook to sell or transfer his licenses. This would, obviously, affect only the financially weak among the present multiple owners. The large and financially strong will not be forced or tempted to sell their holdings; the financially weak may do so. Thus the proposed rule would tend to perpetuate the present network oligopoly and protect the present multiple owners against new or increased competition, while preventing or discouraging the growth and expansion of smaller enterprises in the television field and the entry of strong new enterprises. Thus it appears to me that the proposed rule is likely to do significant harm to the cause of diversity and competition in the field of television broadcasting without countervailing benefits. The present rules on multiple ownership were developed in a series of proceedings extending over a number of years and involving full consideration of all the arguments now before us. These rules have been effective in preventing concentration of station ownership and there is no showing of a need to make the present rules more stringent. Accordingly, I conclude that the proposed rule is unwarranted and unwise, and vote against adoption of the proposed rule and for termination of the present proceeding.

Appendix B

SELECTED STATION DATA FOR EACH MARKET BY TYPE OF OWNER: 1956 AND 1966

1965 MARKET RANK AND ITEMS — GROUP-OWNED STATIONS: 1966 — SINGLE-OWNER STATIONS: 1966

1. New York, N.Y.	CBS	NBC	Metro-media	ABC	RKO	Tribune	New Jersey
	Group-owned						*Single-owner*
a. Call Letters	WCBS	WNBC	WNEW	WABC	WOR	WPIX	WNJU
b. Channel No.	2	4	5	7	9	11	47
c. Network Affiliation(s)	C	N	Ind.	A	Ind.	Ind.	Ind.
d. No. of TV Homes#	5,947	6,118	6,285	6,161	6,263	6,524	-
e. Net Weekly Circulation#	5,375	5,252	4,673	4,877	4,003	4,140	-
f. Average Daily Circulation#	4,002	3,852	2,659	3,246	1,591	2,093	-
g. No. of Ownerships	1	1	1	1	2	1	1

2. Los Angeles, Calif.	CBS	NBC	Gene Autry	ABC	RKO	Metro-media	Chris-Craft	Spanish Internatl.	Coast
	Group-owned								*Single-owner*
a. Call Letters	KNXT	KNBC	KTLA	KABC	KHJ	KTTV	KCOP	KMEX	KPOL
b. Channel No.	2	4	5	7	9	11	13	34	22
c. Network Affiliation(s)	C	N	Ind.	A	Ind.	Ind.	Ind.	Ind.	Ind.
d. No. of TV Homes#	3,429	3,459	3,475	3,459	3,475	3,475	3,397	-	-
e. Net Weekly Circulation#	2,954	2,988	2,339	2,849	2,110	2,168	2,060	-	-
f. Average Daily Circulation#	2,047	1,891	902	1,711	805	908	769	-	-
g. No. of Ownerships	2	1	2	1	2	2	4	1	3

3. Chicago, Ill.	CBS	NBC	ABC	Tribune	Balaban	Weigel
	Group-owned					*Single-owner*
a. Call Letters	WBBM	WMAQ	WBKB	WGN	WFLD	WCIU
b. Channel No.	2	5	7	9	32	26
c. Network Affiliation(s)	C	N	A	Ind.	Ind.	Ind.
d. No. of TV Homes#	2,560	2,565	2,535	2,598	-	1,774
e. Net Weekly Circulation#	2,348	2,344	2,298	2,158	-	118
f. Average Daily Circulation#	1,795	1,707	1,510	1,267	-	25
g. No. of Ownerships	2	1	1	1	1	1

4. Philadelphia, Pa.	Westing-house	Triangle	CBS	Kaiser	Phila.	WIBF	Jersey Cape
	Group-owned				*Single-owner*		
a. Call Letters	KYW	WFIL	WCAU	WKBS	WPHL	WIBF	WCMC
b. Channel No.	3	6	10	48	17	29	40
c. Network Affiliation(s)	N	A	C	Ind.	Ind.	Ind.	Ind.
d. No. of TV Homes#	2,301	2,605	2,363	-	-	-	-
e. Net Weekly Circulation#	2,070	2,092	2,042	-	-	-	-
f. Average Daily Circulation#	1,632	1,530	1,568	-	-	-	-
g. No. of Ownerships	4	1	2	1	2	1	1

5. Boston, Mass.	Westing-house	RKO	WHDH	New Boston
	Group-owned		*Single-owner*	
a. Call Letters	WBZ	WNAC	WHDH	WIHS
b. Channel No.	4	7	5	38
c. Network Affiliation(s)	N	A	C	Ind.
d. No. of TV Homes#	2,000	1,939	2,127	-
e. Net Weekly Circulation#	1,674	1,624	1,675	-
f. Average Daily Circulation#	1,253	1,083	1,199	-
g. No. of Ownerships	1	1	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956						SINGLE-OWNER STATIONS: 1956
1. New York, N.Y.	CBS	NBC	Metro-media	ABC	RKO	Tribune	Atlantic
a. Call Letters	WCBS	WRCA	WABD	WABC	WOR	WPIX	WATV
b. Channel No.	2	4	5	7	9	11	13
c. Network Affiliation(s)	C	N	Ind.	A	Ind.	Ind.	Ind.
d. No. of Sets#	4,535	4,535	4,358	4,150	4,535	4,700	4,724
g. No. of Ownerships	1	1	1	1	2	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956					SINGLE-OWNER STATIONS: 1956	
2. Los Angeles, Calif.	CBS	NBC	ABC	RKO	Loew's	Paramount	Copley Press
a. Call Letters	KNXT	KRCA	KABC	KHJ	KTTV	KTLA	KCOP
b. Channel No.	2	4	7	9	11	5	13
c. Network Affiliation(s)	C	N	A	Ind.	Ind.	Ind.	Ind.
d. No. of Sets#	2,234	2,508	1,966	2,621	2,621	2,308	2,621
g. No. of Ownerships	2	1	1	2	1	1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			
3. Chicago, Ill.	CBS	NBC	ABC	Tribune
a. Call Letters	WBBM	WNBQ	WBKB	WGN
b. Channel No.	2	5	7	9
c. Network Affiliation(s)	C	N	A	Ind.
d. No. of Sets#	2,357	2,287	2,357	2,398
g. No. of Ownerships	2	1	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956		
4. Philadelphia, Pa.	NBC	Triangle	Steinman	WCAU	WPFH Bcstg.	WGLV
a. Call Letters	WRCV	WFIL	WLEV	WCAU	WPFH	WGLV
b. Channel No.	3	6	51	10	12	57
c. Network Affiliation(s)	N	A	N	C	Ind.	A
d. No. of Sets#	2,088	2,235	2,088	2,095	3,051	95
g. No. of Ownerships	3	1	1	1	2	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	
5. Boston, Mass.	Westing-house	RKO
a. Call Letters	WBZ	WNAC
b. Channel No.	4	7
c. Network Affiliation(s)	N	A/C
d. No. of Sets#	1,420	1,420
g. No. of Ownerships	1	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966					SINGLE-OWNER STATIONS: 1966		
6. Detroit, Mich.	Storer	ABC	Kaiser			Evening News		
a. Call Letters	WJBK	WXYZ	WKBD			WWJ		
b. Channel No.	2	7	50			4		
c. Network Affiliation(s)	C	A	Ind.			N		
d. No. of TV Homes#	1,790	1,749	1,188			1,766		
e. Net Weekly Circulation#	1,483	1,479	188			1,520		
f. Average Daily Circulation#	1,083	1,035	72			1,136		
g. No. of Ownerships	1	1	1			1		
7. San Francisco/Concord, Calif.	Cox	Westing-house	ABC			Chronicle Publ.	S. H. Patterson	Jerry Bassett
a. Call Letters	KTVU	KPIX	KGO			KRON	KSAN	KCPT
b. Channel No.	2	5	7			4	32	42
c. Network Affiliation(s)	Ind.	C	A			N	Ind.	Ind.
d. No. of TV Homes#	1,699	1,600	1,591			1,602	-	-
e. Net Weekly Circulation#	1,176	1,294	1,225			1,297	-	-
f. Average Daily Circulation#	541	924	783			890	-	-
g. No. of Ownerships	2	2	1			1	1	1
8. Cleveland, Ohio	NBC	Scripps-Howard	Storer			Radio Enterprises		
a. Call Letters	WKYC	WEWS	WJW			WICA		
b. Channel No.	3	5	8			15		
c. Network Affiliation(s)	N	A	C			Ind.		
d. No. of TV Homes#	1,430	1,455	1,435			-		
e. Net Weekly Circulation#	1,238	1,243	1,224			-		
f. Average Daily Circulation#	978	975	940			-		
g. No. of Ownerships	3	1	2			1		
9. Pittsburgh, Pa.	Westing-house	Hearst	Cox					
a. Call Letters	KDKA	WTAE	WIIC					
b. Channel No.	2	4	11					
c. Network Affiliation(s)	C	A	N					
d. No. of TV Homes#	1,529	1,366	1,279					
e. Net Weekly Circulation#	1,168	1,119	892					
f. Average Daily Circulation#	922	821	588					
g. No. of Ownerships	2	2	2					
10. Washington, D.C.	NBC	Metro-media	Evening Star	Washing-ton Post	United	Capital		
a. Call Letters	WRC	WTTG	WMAL	WTOP	WOOK	WDCA		
b. Channel No.	4	5	7	9	14	20		
c. Network Affiliation(s)	N	Ind.	A	C	Ind.	Ind.		
d. No. of TV Homes#	1,615	1,737	1,572	1,561	251	-		
e. Net Weekly Circulation#	983	997	931	942	22	-		
f. Average Daily Circulation#	632	512	548	624	8	-		
g. No. of Ownerships	1	1	1	2	1	1		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956
6. Detroit, Mich.	Storer	ABC		Evening News
a. Call Letters	WJBK	WXYZ		WWJ
b. Channel No.	2	7		4
c. Network Affiliation(s)	C	A		N
d. No. of Sets#	1,700	1,568		1,620
g. No. of Ownerships	1	1		1
7. San Francisco, Calif.	Chronicle Publ.	Westing-house	ABC	S. H. Patterson
a. Call Letters	KRON	KPIX	KGO	KSAN
b. Channel No.	4	5	7	32
c. Network Affiliation(s)	N	C	A	Ind.
d. No. of Sets#	1,207	1,078	1,207	250
g. No. of Ownerships	1	2	1	1
8. Cleveland, Ohio	Westing-house	Scripps-Howard	Storer	
a. Call Letters	KYW	WEWS	WJW	
b. Channel No.	3	5	8	
c. Network Affiliation(s)	N	A	C	
d. No. of Sets#	1,200	1,200	1,160	
g. No. of Ownerships	2	1	2	
9. Pittsburgh, Pa.	Westing-house	Community		
a. Call Letters	KDKA	WENS		
b. Channel No.	2	16		
c. Network Affiliation(s)	A/C/N	A/C/N		
d. No. of Sets#	1,200	435		
g. No. of Ownerships	2	2		
10. Washington, D.C.	NBC	Metro-media	Washing-ton Post	Evening Star
a. Call Letters	WRC	WTTG	WTOP	WMAL
b. Channel No.	4	5	9	7
c. Network Affiliation(s)	N	Ind.	C	A
d. No. of Sets#	754	700	644	620
g. No. of Ownerships	1	1	2	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966		
11. Baltimore, Md.	A.S. Abell	Hearst	Westinghouse			
a. Call Letters	WMAR	WBAL	WJZ			
b. Channel No.	2	11	13			
c. Network Affiliation(s)	C	N	A			
d. No. of TV Homes#	1,842	1,581	1,684			
e. Net Weekly Circulation#	818	753	784			
f. Average Daily Circulation#	553	492	500			
g. No. of Ownerships	1	1	2			
12. St. Louis, Mo.	Newhouse	CBS		Pulitzer Publ.	220 TV	
a. Call Letters	KTVI	KMOX		KSD	KPLR	
b. Channel No.	2	4		5	11	
c. Network Affiliation(s)	A	C		N	Ind.	
d. No. of TV Homes#	889	892		892	861	
e. Net Weekly Circulation#	790	798		811	548	
f. Average Daily Circulation#	541	627		621	254	
g. No. of Ownerships	2	2		1	1	
13. Hartford/New Haven, Conn.	Triangle	RKO	Balaban	Broadcast Plaza	WATR	
a. Call Letters	WNHC	WHCT	WHNB	WTIC	WATR	
b. Channel No.	8	18	30	3	20	
c. Network Affiliation(s)	A	Ind.	N	C	A	
d. No. of TV Homes#	1,241	267	648	1,525	-	
e. Net Weekly Circulation#	702	23	289	800	-	
f. Average Daily Circulation#	442	5	182	588	-	
g. No. of Ownerships	2	4	3	1	1	
14. Providence, R.I.	Steinman	Outlet	Capital Cities			
a. Call Letters	WGAL	WJAR	WPRO			
b. Channel No.	6	10	12			
c. Network Affiliation(s)	A	N	C			
d. No. of TV Homes#	773	1,744	1,711			
e. Net Weekly Circulation#	417	776	732			
f. Average Daily Circulation#	234	431	399			
g. No. of Ownerships	2	1	2			
15. Dallas/Ft. Worth, Texas	WKY TV			Times-Herald	Carter Publ.	A.H. Belo
a. Call Letters	KTVT			KRLD	WBAP	WFAA
b. Channel No.	11			4	5	8
c. Network Affiliation(s)	Ind.			C	N	A
d. No. of TV Homes#	896			868	869	896
e. Net Weekly Circulation#	598			768	708	756
f. Average Daily Circulation#	322			581	465	507
g. No. of Ownerships	3			2	1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956		
11. Baltimore, Md.	Hearst		A. S. Abell	WAAM	
a. Call Letters	WBAL		WMAR	WAAM	
b. Channel No.	11		2	13	
c. Network Affiliation(s)	N		C	A	
d. No. of Sets#	703		697	703	
g. No. of Ownerships	1		1	1	
12. St. Louis, Mo.	Newhouse		Pulitzer Publ.	Signal Hill Bcstg.	
a. Call Letters	KWK		KSD	KTVI	
b. Channel No.	4		5	36	
c. Network Affiliation(s)	C/A		N	A	
d. No. of Sets#	850		960	414	
g. No. of Ownerships	1		1	1	
13. Hartford/New Haven, Conn.	Triangle	CBS	Julian Gross	Bridgeport Bcstg.	WATR
a. Call Letters	WNHC	WHCT	WNBC	WICC	WATR
b. Channel No.	8	18	30	43	53
c. Network Affiliation(s)	A/C	C	N	A	A
d. No. of Sets#	949	352	374	72	336
g. No. of Ownerships	2	2	1	1	1
14. Providence, R.I.			Outlet	Cherry & Webb	
a. Call Letters			WJAR	WPRO	
b. Channel No.			10	12	
c. Network Affiliation(s)			A/N	C	
d. No. of Sets#			1,404	1,404	
g. No. of Ownerships			1	1	
15. Dallas/Ft. Worth, Texas	Texas St. Network		Times-Herald	Carter Publ.	A.H. Belo
a. Call Letters	KFJZ		KRLD	WBAP	WFAA
b. Channel No.	11		4	5	8
c. Network Affiliation(s)	Ind.		C	A/N	A/N
d. No. of Sets#	541		566	590	564
g. No. of Ownerships	1		1	1	2

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966	
16. Cincinnati, Ohio	Avco	Scripps-Howard	Taft			
a. Call Letters	WLWT	WCPO	WKRC			
b. Channel No.	5	9	12			
c. Network Affiliation(s)	N	C	A			
d. No. of TV Homes#	1,010	962	1,004			
e. Net Weekly Circulation#	712	690	720			
f. Average Daily Circulation#	502	477	485			
g. No. of Ownerships	1	1	1			
17. Minneapolis/St. Paul, Minn.	Cowles/ Ridder	Hubbard	Chris-Craft		20th Century-Fox	
a. Call Letters	WCCO	KSTP	WTCN		KMSP	
b. Channel No.	4	5	11		9	
c. Network Affiliation(s)	C	N	Ind.		A	
d. No. of TV Homes#	808	801	756		777	
e. Net Weekly Circulation#	679	669	475		617	
f. Average Daily Circulation#	524	481	311		385	
g. No. of Ownerships	2/1**	1	4		5	
18. Indianapolis, Ind.	Sarkes Tarzian	Time-Life	Corinthian	Avco		
a. Call Letters	WTTV	WFBM	WISH	WLWI		
b. Channel No.	4	6	8	13		
c. Network Affiliation(s)	Ind.	N	C	A		
d. No. of TV Homes#	819	852	779	821		
e. Net Weekly Circulation#	477	678	635	641		
f. Average Daily Circulation#	232	482	472	439		
g. No. of Ownerships	1	2	2	1		
19. Atlanta, Ga.	Cox	Storer			WIBC	
a. Call Letters	WSB	WAGA			WAII	
b. Channel No.	2	5			11	
c. Network Affiliation(s)	N	C			A	
d. No. of TV Homes#	798	804			762	
e. Net Weekly Circulation#	615	609			547	
f. Average Daily Circulation#	472	449			348	
g. No. of Ownerships	1	1			4	
20. Miami, Fla.	Wometco				Sunbeam	L.B. Wilson
a. Call Letters	WTVJ				WCKT	WLBW
b. Channel No.	4				7	10
c. Network Affiliation(s)	C				N	A
d. No. of TV Homes#	656				656	656
e. Net Weekly Circulation#	611				580	554
f. Average Daily Circulation#	485				406	320
g. No. of Ownerships	1				2	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956				SINGLE-OWNER STATIONS: 1956	
16. Cincinnati, Ohio	Avco	Scripps-Howard	Taft			
a. Call Letters	WLWT	WCPO	WKRC			
b. Channel No.	5	9	12			
c. Network Affiliation(s)	N	A	C			
d. No. of Sets#	775	851	775			
g. No. of Ownerships	1	1	1			
17. Minneapolis/St. Paul, Minn.	Cowles/Ridder	Hubbard	Loew's/Community	Bitner		
a. Call Letters	WCCO	KSTP	KMGM	WTCN		
b. Channel No.	4	5	9	11		
c. Network Affiliation(s)	C	N	Ind.	A		
d. No. of Sets#	615	689	632	615		
g. No. of Ownerships	2/1**	1	2/2**	2		
18. Indianapolis, Ind.	Bitner	Universal Bcstg.			Sarkes Tarzian	
a. Call Letters	WFBM	WISH			WTTV	
b. Channel No.	6	8			4	
c. Network Affiliation(s)	N	C			A/N	
d. No. of Sets#	702	660			668	
g. No. of Ownerships	1	1			1	
19. Atlanta, Ga.	Cox	Storer	Avco			
a. Call Letters	WSB	WAGA	WLWA			
b. Channel No.	2	5	11			
c. Network Affiliation(s)	N	C	A			
d. No. of Sets#	571	522	556			
g. No. of Ownerships	1	1	2			
20. Miami, Fla.	Cox	Storer			Wometco	Gerico
a. Call Letters	WCKT	WGBS			WTVJ	WITV
b. Channel No.	7	23			4	17
c. Network Affiliation(s)	N	Ind.			A/C	A
d. No. of Sets#	376	279			388	376
g. No. of Ownerships	1	2			1	1

\# In thousands.

** This represents the number of ownerships for the interests held by each of the present majority owners.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966	
21. Seattle/Tacoma, Wash.	Fisher's Blend	King	Bonneville Internatl.	Tribune Publ.	J. Elroy McCaw
a. Call Letters	KOMO	KING	KIRO	KTNT	KTVW
b. Channel No.	4	5	7	11	13
c. Network Affiliation(s)	A	N	C	Ind.	Ind.
d. No. of TV Homes#	659	658	617	602	493
e. Net Weekly Circulation#	607	606	553	329	77
f. Average Daily Circulation#	452	462	380	142	17
g. No. of Ownerships	2	2	2	1	2
22. Buffalo, N.Y.	Taft	Capital Cities		WBEN	
a. Call Letters	WGR	WKBW		WBEN	
b. Channel No.	2	7		4	
c. Network Affiliation(s)	N	A		C	
d. No. of TV Homes#	663	739		931	
e. Net Weekly Circulation#	521	561		600	
f. Average Daily Circulation#	384	408		476	
g. No. of Ownerships	2	2		1	
23. Milwaukee, Wisc.	Storer	Hearst	WKY TV	Journal	
a. Call Letters	WITI	WISN	WVTV	WTMJ	
b. Channel No.	6	12	18	4	
c. Network Affiliation(s)	A	C	Ind.	N	
d. No. of TV Homes#	753	664	450	842	
e. Net Weekly Circulation#	562	552	113	584	
f. Average Daily Circulation#	398	382	33	426	
g. No. of Ownerships	2	2	5	1	
24. Kansas City, Mo.	Taft	Meredith	Metromedia		
a. Call Letters	WDAF	KCMO	KMBC		
b. Channel No.	4	5	9		
c. Network Affiliation(s)	N	C	A		
d. No. of TV Homes#	685	677	690		
e. Net Weekly Circulation#	583	572	581		
f. Average Daily Circulation#	406	416	398		
g. No. of Ownerships	4	2	3		
25. Houston, Texas	Hobby	Corinthian		Houston Cons.	
a. Call Letters	KPRC	KHOU		KTRK	
b. Channel No.	2	11		13	
c. Network Affiliation(s)	N	C		A	
d. No. of TV Homes#	622	601		621	
e. Net Weekly Circulation#	555	552		560	
f. Average Daily Circulation#	400	409		414	
g. No. of Ownerships	2	2		1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956	
21. Seattle/Tacoma, Wash.	Gamble	J. Elroy McCaw	King	Tribune Publ.
a. Call Letters	KOMO	KTVW	KING	KTNT
b. Channel No.	4	13	5	11
c. Network Affiliation(s)	N	Ind.	A	C
d. No. of Sets#	531	525	531	538
g. No. of Ownerships	1	2	2	1
22. Buffalo, N.Y.	Trans-continental	NBC	WBEN	
a. Call Letters	WGR	WBUF	WBEN	
b. Channel No.	2	17	4	
c. Network Affiliation(s)	A	N	C	
d. No. of Sets#	558	184	558	
g. No. of Ownerships	1	2	1	
23. Milwaukee, Wisc.	Hearst	CBS	Journal	Independent
a. Call Letters	WISN	WXIX	WTMJ	WITI
b. Channel No.	12	19	4	6
c. Network Affiliation(s)	A	C	N	Ind.
d. No. of Sets#	783	307	781	700
g. No. of Ownerships	2	2	1	1
24. Kansas City, Mo.	Meredith		Kansas City Star	KMBC
a. Call Letters	KCMO		WDAF	KMBC
b. Channel No.	5		4	9
c. Network Affiliation(s)	C		N	A
d. No. of Sets#	590		611	550
g. No. of Ownerships	2		1	2
25. Houston, Texas	Corinthian		Hobby	Houston Cons.
a. Call Letters	KGUL		KPRC	KTRK
b. Channel No.	11		2	13
c. Network Affiliation(s)	C		N	A
d. No. of Sets#	500		492	492
g. No. of Ownerships	2		2	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
26. Toledo, Ohio	Cosmos	Storer		D. H. Overmyer
a. Call Letters	WTOL	WSPD		WDHO
b. Channel No.	11	13		24
c. Network Affiliation(s)	C	A		Ind.
d. No. of TV Homes#	1,764	619		-
e. Net Weekly Circulation#	550	415		-
f. Average Daily Circulation#	356	282		-
g. No. of Ownerships	2	1		1
27. Sacramento/Stockton, Calif.	Corin-thian	McClatchy		Kelly
a. Call Letters	KXTV	KOVR		KCRA
b. Channel No.	10	13		3
c. Network Affiliation(s)	C	A		N
d. No. of TV Homes#	708	706		882
e. Net Weekly Circulation#	483	484		536
f. Average Daily Circulation#	330	330		372
g. No. of Ownerships	2	4		2
28. Dayton, Ohio	Avco	Cox	Springfield	
a. Call Letters	WLWD	WHIO	WKEF	
b. Channel No.	2	7	22	
c. Network Affiliation(s)	A/N	C	Ind.	
d. No. of TV Homes #	916	976	-	
e. Net Weekly Circulation#	466	534	-	
f. Average Daily Circulation#	321	377	-	
g. No. of Ownerships	1	1	2	
29. Charlotte, N.C.	Jefferson Standard	Cox	Bahakel	
a. Call Letters	WBTV	WSOC	WCCB	
b. Channel No.	3	9	36	
c. Network Affiliation(s)	C	A/N	Ind.	
d. No. of TV Homes#	802	747	-	
e. Net Weekly Circulation#	505	408	-	
f. Average Daily Circulation#	382	278	-	
g. No. of Ownerships	1	2	4	
30. Columbus, Ohio	Avco	Taft		WBNS
a. Call Letters	WLWC	WTVN		WBNS
b. Channel No.	4	6		10
c. Network Affiliation(s)	N	A		C
d. No. of TV Homes#	675	626		724
e. Net Weekly Circulation#	484	484		501
f. Average Daily Circulation#	332	347		369
g. No. of Ownerships	1	2		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
26. Toledo, Ohio	Storer	
a. Call Letters	WSPD	
b. Channel No.	13	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	406	
g. No. of Ownerships	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956		
27. Sacramento/Stockton, Calif.	Gamble	KCRA	Sacramento Tlcstrs.	Capital City
a. Call Letters	KOVR	KCRA	KBET	KCCC
b. Channel No.	13	3	10	40
c. Network Affiliation(s)	Ind.	N	C	A
d. No. of Sets#	1,132	1,132	1,132	1,132
g. No. of Ownerships	1	1	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	
28. Dayton, Ohio	Avco	Cox
a. Call Letters	WLWD	WHIO
b. Channel No.	2	7
c. Network Affiliation(s)	A/N	C
d. No. of Sets#	348	637
g. No. of Ownerships	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956
29. Charlotte, N.C.	Jefferson Standard
a. Call Letters	WBTV
b. Channel No.	3
c. Network Affiliation(s)	A/C/N
d. No. of Sets#	528
g. No. of Ownerships	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956
30. Columbus, Ohio	Avco	Taft	WBNS
a. Call Letters	WLWC	WTVN	WBNS
b. Channel No.	4	6	10
c. Network Affiliation(s)	N	A	C
d. No. of Sets#	480	438	539
g. No. of Ownerships	1	2	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966		
31. Wheeling, W.Va./ Steubenville, Ohio	Rust Craft			WTRF		
a. Call Letters	WSTV			WTRF		
b. Channel No.	9			7		
c. Network Affiliation(s)	A/C			N		
d. No. of TV Homes#	501			1,157		
e. Net Weekly Circulation#	495			319		
f. Average Daily Circulation#	274			189		
g. No. of Ownerships	2			2		
32. Tampa/St. Petersburg, Fla.	WKY TV			Tampa Tribune	WLCY	[illegible] Levinson
a. Call Letters	WTVT			WFLA	WLCY	WSUN
b. Channel No.	13			8	10	38
c. Network Affiliation(s)	C			N	A	A
d. No. of TV Homes#	517			560	-	395
e. Net Weekly Circulation#	460			479	-	262
f. Average Daily Circulation#	367			390	-	149
g. No. of Ownerships	2			1	1	2
33. Harrisburg/Lancaster/ Lebanon/York, Pa.	Steinman	Triangle	Newhouse	WHP	Susquehanna	
a. Call Letters	WGAL	WLYH	WTPA	WHP	WSBA	
b. Channel No.	8	15	27	21	43	
c. Network Affiliation(s)	N	C	A	C	C	
d. No. of TV Homes#	799	333	449	375	89	
e. Net Weekly Circulation#	473	55	178	171	44	
f. Average Daily Circulation#	308	26	116	109	25	
g. No. of Ownerships	1	2	1	1	1	
34. Memphis, Tenn.	Cowles	Scripps-Howard	RKO			
a. Call Letters	WREC	WMCT	WHBQ			
b. Channel No.	3	5	13			
c. Network Affiliation(s)	C	N	A			
d. No. of TV Homes#	550	577	538			
e. Net Weekly Circulation#	461	469	429			
f. Average Daily Circulation#	362	335	289			
g. No. of Ownerships	2	1	2			
35. Syracuse, N.Y.	Newhouse*	Newhouse+	Meredith	Channel 9		
a. Call Letters	WSYR	WSYE	WHEN	WNYS		
b. Channel No.	3	18	5	9		
c. Network Affiliation(s)	N	N	C	A		
d. No. of TV Homes#	685*	+	605	643		
e. Net Weekly Circulation#	467*	+	425	389		
f. Average Daily Circulation#	350*	+	313	252		
g. No. of Ownerships	1	1	1	1		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956			
31. Wheeling, W. Va./ Steubenville, Ohio				Tri-City Bcstg.	WSTV		
a. Call Letters				WTRF	WSTV		
b. Channel No.				7	9		
c. Network Affiliation(s)				A/N	A/C		
d. No. of Sets#				307	1,045		
g. No. of Ownerships				1	1		
32. Tampa/St. Petersburg, Fla.	WKY TV			Tampa Tribune	City of St. Petersburg		
a. Call Letters	WTVT			WFLA	WSUN		
b. Channel No.	13			8	38		
c. Network Affiliation(s)	C			N	A		
d. No. of Sets#	330			350	216		
g. No. of Ownerships	1			1	1		
33. Harrisburg/Lancaster Lebanon/York, Pa.	Steinman	Newhouse		Rossmoyne	Susquehanna	Helm Coal	WHP
a. Call Letters	WGAL	WTPA		WCMB	WSBA	WNOW	WHP
b. Channel No.	8	71		27	43	49	55
c. Network Affiliation(s)	C/N	A		Ind.	A	Ind.	C
d. No. of Sets#	917	200		200	116	117	117
g. No. of Ownerships	1	1		1	1	1	1
34. Memphis, Tenn.	Scripps-Howard	RKO		WREC			
a. Call Letters	WMCT	WHBQ		WREC			
b. Channel No.	5	13		3			
c. Network Affiliation(s)	N	A		C			
d. No. of Sets#	469	469		460			
g. No. of Ownerships	1	2		1			
35. Syracuse, N.Y.	Newhouse	Meredith	Scranton				
a. Call Letters	WSYR	WHEN	WTVE				
b. Channel No.	3	8	24				
c. Network Affiliation(s)	N	A/C	A/N				
d. No. of Sets#	380	380	35				
g. No. of Ownerships	1	1	1				

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966
36. Portland, Ore.	Fisher's Blend	Newhouse	King	Chris-Craft	
a. Call Letters	KATU	KOIN	KGW	KPTV	
b. Channel No.	2	6	8	12	
c. Network Affiliation(s)	A	C	N	Ind.	
d. No. of TV Homes#	543	559	506	529	
e. Net Weekly Circulation#	407	462	418	338	
f. Average Daily Circulation#	259	338	301	165	
g. No. of Ownerships	1	1	1	4	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
37. Albany/Schenectady/Troy, N.Y.	General Electric	Capital Cities*	Capital Cities+	Van Curler
a. Call Letters	WRGB	WTEN	WCDC	WAST
b. Channel No.	6	10	19	13
c. Network Affiliation(s)	N	C	C	A
d. No. of TV Homes#	666	599*	+	532
e. Net Weekly Circulation#	461	404*	+	358
f. Average Daily Circulation#	358	299*	+	249
g. No. of Ownerships	1	2	2	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
38. Grand Rapids/Kalamazoo, Mich.	Fetzer	Time-Life	W. Michigan Telecasters
a. Call Letters	WKZO	WOOD	WZZM
b. Channel No.	3	8	13
c. Network Affiliation(s)	C	N	A
d. No. of TV Homes#	635	605	402
e. Net Weekly Circulation#	450	435	269
f. Average Daily Circulation#	322	315	170
g. No. of Ownerships	1	3	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
39. Birmingham/Tuscaloosa, Ala.	Taft	Newhouse	Southern	Chapman
a. Call Letters	WBRC	WAPI	WBMG	WCFT
b. Channel No.	6	13	42	33
c. Network Affiliation(s)	A	C/N	Ind.	N
d. No. of TV Homes#	593	525	-	-
e. Net Weekly Circulation#	447	412	-	-
f. Average Daily Circulation#	369	320	-	-
g. No. of Ownerships	3	3	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966
40. Denver, Colo.	Tribune	Metro-politan	Time-Life	Mullins	
a. Call Letters	KWGN	KOA	KLZ	KBTV	
b. Channel No.	2	4	7	9	
c. Network Affiliation(s)	Ind.	N	C	A	
d. No. of TV Homes#	457	549	538	485	
e. Net Weekly Circulation#	303	436	423	426	
f. Average Daily Circulation#	135	311	331	303	
g. No. of Ownerships	5	2	2	4	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956	
36. Portland, Ore.	Newhouse	Storer	Oregon	
a. Call Letters	KOIN	KPTV	KLOR	
b. Channel No.	6	27	12	
c. Network Affiliation(s)	C	N	A	
d. No. of Sets#	358	294	358	
g. No. of Ownerships	1	2	1	
37. Albany/Schenectady/ Troy, N.Y.	Capital Cities*	Capital Cities +	General Electric	Van Curler
a. Call Letters	WCDA	WCDB	WRGB	WTRI
b. Channel No.	41	29	6	35
c. Network Affiliation(s)	C	C	N	A
d. No. of Sets#	180*	+	493	175
g. No. of Ownerships	2	1	1	2
38. Grand Rapids/ Kalamazoo, Mich.	Fetzer	Bitner		
a. Call Letters	WKZO	WOOD		
b. Channel No.	3	8		
c. Network Affiliation(s)	A/C	A/N		
d. No. of Sets#	633	568		
g. No. of Ownerships	1	2		
39. Birmingham/Tuscaloosa, Ala.	Storer	Newhouse		
a. Call Letters	WBRC	WABT		
b. Channel No.	6	13		
c. Network Affiliation(s)	C	A/N		
d. No. of Sets#	366	370		
g. No. of Ownerships	2	3		
40. Denver, Colo.	J. Elroy McCaw	Time-Life	Metro-politan	Mullins
a. Call Letters	KTVR	KLZ	KOA	KBTV
b. Channel No.	2	7	4	9
c. Network Affiliation(s)	Ind.	C	N	A
d. No. of Sets#	382	410	395	383
g. No. of Ownerships	2	2	1	3

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966	
41. Johnstown/Altoona, Pa.	Triangle			WJAC	Rivoli Realty
a. Call Letters	WFBG			WJAC	WARD
b. Channel No.	10			6	19
c. Network Affiliation(s)	A/C			N	C
d. No. of TV Homes#	405			1,196	-
e. Net Weekly Circulation#	221			434	-
f. Average Daily Circulation#	162			280	-
g. No. of Ownerships	2			1	1
42. Nashville, Tenn.	Murch-ison	General Electric		WSM	
a. Call Letters	WLAC	WSIX		WSM	
b. Channel No.	5	8		4	
c. Network Affiliation(s)	C	A		N	
d. No. of TV Homes#	552	545		553	
e. Net Weekly Circulation#	431	372		423	
f. Average Daily Circulation#	338	240		324	
g. No. of Ownerships	2	4		1	
43. New Orleans, La.	Royal Street	Screen Gems		Loyola Univ.	
a. Call Letters	WDSU	WVUE		WWL	
b. Channel No.	6	12		4	
c. Network Affiliation(s)	N	A		C	
d. No. of TV Homes#	502	446		488	
e. Net Weekly Circulation#	423	342		428	
f. Average Daily Circulation#	331	228		340	
g. No. of Ownerships	1	2		1	
44. Greenville/Spartanburg, S.C./Asheville, N.C.	South-eastern	Wometco	Thoms	Spartan	Wilton Hall
a. Call Letters	WFBC	WLOS	WISE	WSPA	WAIM
b. Channel No.	4	13	62	7	40
c. Network Affiliation(s)	N	A	N	C	A/C
d. No. of TV Homes#	613	790	-	648	-
e. Net Weekly Circulation#	397	427	-	372	-
f. Average Daily Circulation#	282	267	-	229	-
g. No. of Ownerships	1	3	1	1	1
45. Charleston/Huntington, W.Va.	Capital Cities	Rollins Tlcstg.	Reeves	Reynard Osborne	
a. Call Letters	WSAZ	WCHS	WHTN	WRLO	
b. Channel No.	3	8	13	30	
c. Network Affiliation(s)	N	C	A	Ind.	
d. No. of TV Homes#	507	502	513	-	
e. Net Weekly Circulation#	410	359	363	-	
f. Average Daily Circulation#	340	261	261	-	
g. No. of Ownerships	3	2	3	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956				
41. Johnstown/Altoona, Pa.	Triangle	WJAC	Rivoli Realty			
a. Call Letters	WFBG	WJAC	WARD			
b. Channel No.	10	6	56			
c. Network Affiliation(s)	A/C/N	A/N	A/C			
d. No. of Sets#	449	1,029	449			
g. No. of Ownerships	2	1	1			
42. Nashville, Tenn.	Life & Cas. Ins.	WSM	WSIX			
a. Call Letters	WLAC	WSM	WSIX			
b. Channel No.	5	4	8			
c. Network Affiliation(s)	C	N	A			
d. No. of Sets#	303	276	380			
g. No. of Ownerships	1	1	1			
43. New Orleans, La.	Royal Street	Supreme Bcstg.				
a. Call Letters	WDSU	WJMR				
b. Channel No.	6	20				
c. Network Affiliation(s)	A/C/N	A/C				
d. No. of Sets#	410	151				
g. No. of Ownerships	1	1				
44. Greenville/Spartanburg, S.C./Asheville, N.C.		South-eastern	Spartan	Skyway Bcstg.	Wilton Hall	Thoms
a. Call Letters		WFBC	WSPA	WLOS	WAIM	WISE
b. Channel No.		4	7	13	40	62
c. Network Affiliation(s)		N	C	A	Ind.	N/C
d. No. of Sets#		330	287	342	127	38
g. No. of Ownerships		1	1	1	1	1
45. Charleston/Huntington, W.Va.	Cowles	WSAZ	WCHS			
a. Call Letters	WHTN	WSAZ	WCHS			
b. Channel No.	13	3	8			
c. Network Affiliation(s)	A	N	C			
d. No. of Sets#	360	586	540			
g. No. of Ownerships	2	1	1			

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966		
46. Saginaw/Bay City/Flint, Mich.			Gerity	WJRT	Lake Huron
a. Call Letters			WNEM	WJRT	WKNX
b. Channel No.			5	12	25
c. Network Affiliation(s)			N	A	C
d. No. of TV Homes#			378	567	124
e. Net Weekly Circulation#			306	408	69
f. Average Daily Circulation#			218	284	43
g. No. of Ownerships			1	2	1
47. Lansing, Mich.			Gross Tlcstg.	TV Corp. of Mich.	
a. Call Letters			WJIM	WILX	
b. Channel No.			6	10	
c. Network Affiliation(s)			C	N	
d. No. of TV Homes#			849	531	
e. Net Weekly Circulation#			404	262	
f. Average Daily Circulation#			254	143	
g. No. of Ownerships			1	1	
48. Louisville, Ky.	George Norton		WHAS	Kentuckiana	
a. Call Letters	WAVE		WHAS	WLKY	
b. Channel No.	3		11	32	
c. Network Affiliation(s)	N		C	A	
d. No. of TV Homes#	507		426	252	
e. Net Weekly Circulation#	396		341	146	
f. Average Daily Circulation#	320		271	81	
g. No. of Ownerships	1		1	1	
49. Greensboro/Winston-Salem/High Point, N.C.	Norfolk-Portsmouth	Southern	Triangle Bcstg.		
a. Call Letters	WFMY	WGHP	WSJS		
b. Channel No.	2	8	12		
c. Network Affiliation(s)	C	A	N		
d. No. of TV Homes#	631	699	597		
e. Net Weekly Circulation#	376	392	356		
f. Average Daily Circulation#	252	232	232		
g. No. of Ownerships	2	1	1		
50. Raleigh/Durham, N.C.	Capital Cities		Capitol Bcstg.		
a. Call Letters	WTVD		WRAL		
b. Channel No.	11		5		
c. Network Affiliation(s)	C/N		A		
d. No. of TV Homes#	511		610		
e. Net Weekly Circulation#	329		364		
f. Average Daily Circulation#	238		229		
g. No. of Ownerships	2		1		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
46. Saginaw/Bay City/Flint, Mich.		Gerity	Lake Huron
a. Call Letters		WNEM	WKNX
b. Channel No.		5	57
c. Network Affiliation(s)		A/N	A/C
d. No. of Sets#		313	160
g. No. of Ownerships		1	1
47. Lansing, Mich.		Gross Tlsctg.	
a. Call Letters		WJIM	
b. Channel No.		6	
c. Network Affiliation(s)		450	
d. No. of Sets#		A/C/N	
g. No. of Ownerships		1	
48. Louisville, Ky.	George Norton	WHAS	
a. Call Letters	WAVE	WHAS	
b. Channel No.	3	11	
c. Network Affiliation(s)	A/N	C	
d. No. of Sets#	500	500	
g. No. of Ownerships	1	1	
49. Greensboro/Winston-Salem/High Point, N.C.	Jefferson Standard	Triangle Bcstg.	Southern
a. Call Letters	WFMY	WSJS	WTOB
b. Channel No.	2	12	26
c. Network Affiliation(s)	A/C	N	A
d. No. of Sets#	454	586	131
g. No. of Ownerships	1	1	1
50. Raleigh/Durham, N.C.	Great Lakes	Durham Bcstg.	Fayetteville Bcstrs.
a. Call Letters	WNAO	WTVD	WFLB
b. Channel No.	28	11	18
c. Network Affiliation(s)	A/C/N	A/N	A/C/N
d. No. of Sets#	140	283	39
g. No. of Ownerships	1	1	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966	
51. Oklahoma City, Okla.	WKY TV	Kerr-McGee	Bass	Griffin-Leake	KLPR	
a. Call Letters	WKY	KOCO	KFDO	KWTV	KLPR	
b. Channel No.	4	5	8	9	14	
c. Network Affiliation(s)	N	A	Ind.	C	Ind.	
d. No. of TV Homes#	466	407	21	438	-	
e. Net Weekly Circulation#	355	331	4	360	-	
f. Average Daily Circulation#	281	215	2	274	-	
g. No. of Ownerships	1	3	2	1	1	
52. Salinas/Monterey/Santa Cruz/San Jose, Calif.	Central Cal. Comm.*	Central Cal. Comm.+			Standard	
a. Call Letters	KSBW	KSBY			KNTV	
b. Channel No.	8	6			11	
c. Network Affiliation(s)	C/N	C/N			A	
d. No. of TV Homes#	259*	+			1,278	
e. Net Weekly Circulation#	187*	+			357	
f. Average Daily Circulation#	130*	+			181	
g. No. of Ownerships	2	2			1	
53. Manchester, N.H.	United					
a. Call Letters	WMUR					
b. Channel No.	9					
c. Network Affiliation(s)	A					
d. No. of TV Homes#	1,441					
e. Net Weekly Circulation#	349					
f. Average Daily Circulation#	136					
g. No. of Ownerships	2					
54. San Diego, Calif.	Lindsay-Schaub	Time-Life			San Diego Tlcstrs.	
a. Call Letters	KFMB	KOGO			KAAR	
b. Channel No.	8	10			39	
c. Network Affiliation(s)	C	N			Ind.	
d. No. of TV Homes#	413	469			-	
e. Net Weekly Circulation#	342	346			-	
f. Average Daily Circulation#	258	254			-	
g. No. of Ownerships	6	4			1	
55. Norfolk, Va.	Norfolk-Portsmouth				Tidewater Teleradio	Peninsula Bcstg.
a. Call Letters	WTAR				WAVY	WVEC
b. Channel No.	3				10	13
c. Network Affiliation(s)	C				N	A
d. No. of TV Homes#	404				392	319
e. Net Weekly Circulation#	338				315	271
f. Average Daily Circulation#	277				230	191
g. No. of Ownerships	1				1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956		
51. Oklahoma City, Okla.	WKY TV	Griffin-Leake	Streets Electronics		
a. Call Letters	WKY	KWTV	KGEO		
b. Channel No.	4	9	5		
c. Network Affiliation(s)	N	C	A		
d. No. of Sets#	388	388	265		
g. No. of Ownerships	1	1	1		
52. Salinas/Monterey/Santa Cruz/San Jose, Calif.	Central Cal. Comm.	Central Cal. Comm.	Standard		
a. Call Letters	KVEC	KSBW	KNTV		
b. Channel No.	6	8	11		
c. Network Affiliation(s)	A/C	A/C/N	Ind.		
d. No. of Sets#	50	350	613		
g. No. of Ownerships	2	2	1		
53. Manchester, N.H.			Radio Voice of N.H....		
a. Call Letters			WMUR		
b. Channel No.			9		
c. Network Affiliation(s)			A/C		
d. No. of Sets#			1,128		
g. No. of Ownerships			1		
54. San Diego, Calif.			Wrather-Alvarez	Fox Wells	
a. Call Letters			KFMB	KFSD	
b. Channel No.			8	10	
c. Network Affiliation(s)			C	N	
d. No. of Sets#			450	407	
g. No. of Ownerships			3	2	
55. Norfolk, Va.			Norfolk-Portsmouth	Peninsula Bcstg.	Timbrite
a. Call Letters			WTAR	WVEC	WTOV
b. Channel No.			3	15	27
c. Network Affiliation(s)			A/C	N	Ind.
d. No. of Sets#			418	185	150
g. No. of Ownerships			1	1	1

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966							SINGLE-OWNER STATIONS: 1966	
56. Wichita, Kansas	Kansas St. Network*	Kansas St. Network +	Kansas St. Network+	Kansas St. Network +	Cowles	KAKE*	KAKE+		
a. Call Letters	KARD	KCKT	KOMC	KGLD	KTVH	KAKE	KUPK		
b. Channel No.	3	2	8	11	12	10	13		
c. Network Affiliation(s)	N	N	N	N	C	A	A		
d. No. of TV Homes#	399*	+	+	+	295	332*	+		
e. Net Weekly Circulation#	332*	+	+	+	241	268*	+		
f. Average Daily Circulation#	247*	+	+	+	182	188*	+		
g. No. of Ownerships	1	2	2	2	2	1	1		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
57. San Antonio, Texas	Avco	Harte-Hanks	Spanish Internatl.	Mission Tlcstg.
a. Call Letters	WOAI	KENS	KWEX	KONO
b. Channel No.	4	5	41	12
c. Network Affiliation(s)	N	C	Ind.	A
d. No. of TV Homes#	413	417	-	408
e. Net Weekly Circulation#	318	320	-	315
f. Average Daily Circulation#	222	235	-	231
g. No. of Ownerships	2	4	2	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		
58. Tulsa, Okla.	Kerr-McGee	Corinthian	Griffin-Leake
a. Call Letters	KVOO	KOTV	KTUL
b. Channel No.	2	6	8
c. Network Affiliation(s)	N	C	A
d. No. of TV Homes#	423	423	386
e. Net Weekly Circulation#	311	316	289
f. Average Daily Circulation#	221	243	203
g. No. of Ownerships	1	3	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
59. Portland, Maine	Maine Bcstg.	Community	Guy Gannett
a. Call Letters	WCSH	WMTW	WGAN
b. Channel No.	6	8	13
c. Network Affiliation(s)	N	A	C
d. No. of TV Homes#	319	476	298
e. Net Weekly Circulation#	206	314	201
f. Average Daily Circulation#	143	190	150
g. No. of Ownerships	1	2	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966	
60. Omaha, Neb.	Meredith	May	Herald
a. Call Letters	WOW	KMTV	KETV
b. Channel No.	6	3	7
c. Network Affiliation(s)	C	N	A
d. No. of TV Homes#	374	368	387
e. Net Weekly Circulation#	297	314	309
f. Average Daily Circulation#	214	228	218
g. No. of Ownerships	2	1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956		
56. Wichita, Kansas	Cowles			Central Kansas	Kansas St. Network	KAKE
a. Call Letters	KTVH			KCKT	KARD	KAKE
b. Channel No.	12			2	3	10
c. Network Affiliation(s)	C			N	N	A
d. No. of Sets#	251			187	265	265
g. No. of Ownerships	2			1	1	1
57. San Antonio, Texas				Southland Industries	Express Publ.	KCOR
a. Call Letters				WOAI	KENS	KCOR
b. Channel No.				4	5	41
c. Network Affiliation(s)				N	C	Ind.
d. No. of Sets#				340	337	70
g. No. of Ownerships				1	3	1
58. Tulsa, Okla.	Kerr-McGee	Corinthian	Griffin-Leake			
a. Call Letters	KVOO	KOTV	KTVX			
b. Channel No.	2	6	8			
c. Network Affiliation(s)	N	C	A			
d. No. of Sets#	319	317	198			
g. No. of Ownerships	1	3	1			
59. Portland, Maine	Community			Maine Bcstg.	Guy Gannett	
a. Call Letters	WMTW			WCSH	WGAN	
b. Channel No.	8			6	13	
c. Network Affiliation(s)	A/C			N	A/C	
d. No. of Sets#	250			190	185	
g. No. of Ownerships	1			1	1	
60. Omaha, Neb.	Palmer	Meredith				
a. Call Letters	KMTV	WOW				
b. Channel No.	3	6				
c. Network Affiliation(s)	A/N	C				
d. No. of Sets#	412	382				
g. No. of Ownerships	1	2				

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966		
61. Roanoke/Lynchburg, Va.	Evening Star			Times World	Shenandoah Life	Roanoke
a. Call Letters	WLVA			WDBJ	WSLS	WRFT
b. Channel No.	13			7	10	27
c. Network Affiliation(s)	A			C	N	A
d. No. of TV Homes#	282			574	496	-
e. Net Weekly Circulation#	138			307	288	-
f. Average Daily Circulation#	77			226	199	-
g. No. of Ownerships	2			1	1	1
62. Phoenix, Ariz.	Meredith	Gene Autry		Arizona	KTAR	
a. Call Letters	KPHO	KOOL		KTVK	KTAR	
b. Channel No.	5	10		3	12	
c. Network Affiliation(s)	Ind.	C		A	N	
d. No. of TV Homes#	352	337		341	337	
e. Net Weekly Circulation#	283	306		307	305	
f. Average Daily Circulation#	162	231		203	212	
g. No. of Ownerships	3	1		1	2	
63. Salt Lake City/Ogden/Provo, Utah	Glasmann	Screen Gems	Bonneville Internatl.			
a. Call Letters	KUTV	KCPX	KSL			
b. Channel No.	2	4	5			
c. Network Affiliation(s)	N	A	C			
d. No. of TV Homes#	379	411	384			
e. Net Weekly Circulation#	293	298	297			
f. Average Daily Circulation#	202	222	220			
g. No. of Ownerships	2	3	1			
64. Green Bay, Wisc.	George Norton	Post		Norbertine Fathers		
a. Call Letters	WFRV	WLUK		WBAY		
b. Channel No.	5	11		2		
c. Network Affiliation(s)	N	A		C		
d. No. of TV Homes#	425	406		399		
e. Net Weekly Circulation#	293	279		297		
f. Average Daily Circulation#	204	191		230		
g. No. of Ownerships	2	3		1		
65. Richmond, Va.	Park			Petersburg	Richmond	
a. Call Letters	WTVR			WXEX	WRVA	
b. Channel No.	6			8	12	
c. Network Affiliation(s)	C			A	N	
d. No. of TV Homes#	469			439	357	
e. Net Weekly Circulation#	294			261	265	
f. Average Daily Circulation#	225			166	175	
g. No. of Ownerships	2			1	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956		
61. Roanoke/Lynchburg, Va.				Times World	Shenandoah Life	Lynchburg
a. Call Letters				WDBJ	WSLS	WLVA
b. Channel No.				7	10	13
c. Network Affiliation(s)				C	A/N	A
d. No. of Sets#				376	479	309
g. No. of Ownerships				1	1	1
62. Phoenix, Ariz.	Meredith	Gene Autry		Arizona	KTAR	
a. Call Letters	KPHO	KOOL		KTVK	KTAR	
b. Channel No.	5	10		3	12	
c. Network Affiliation(s)	Ind.	C		A	N	
d. No. of Sets#	150	175		150	149	
g. No. of Ownerships	3	1		1	2	
63. Salt Lake City/Ogden/Provo, Utah	Glasmann	Time-Life	Bonneville Internatl.			
a. Call Letters	KUTV	KTVT	KSL			
b. Channel No.	2	4	5			
c. Network Affiliation(s)	A	N	C			
d. No. of Sets#	205	210	210			
g. No. of Ownerships	2	2	1			
64. Green Bay, Wisc.				Norbertine Fathers	Valley Tlcstg.	M & M Bcstg.
a. Call Letters				WBAY	WFRV	WMBV
b. Channel No.				2	5	11
c. Network Affiliation(s)				C	A/C	N
d. No. of Sets#				247	235	221
g. No. of Ownerships				1	1	1
65. Richmond, Va.				Havens & Martin	Petersburg	Richmond
a. Call Letters				WTVR	WXEX	WRVA
b. Channel No.				6	8	12
c. Network Affiliation(s)				A	N	C
d. No. of Sets#				503	419	200
g. No. of Ownerships				1	1	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966		
66. Quad City (Davenport, Ia./ Rock Island/Moline, Ill.)	Palmer		Rock Island	Moline	
a. Call Letters	WOC		WHBF	WQAD	
b. Channel No.	6		4	8	
c. Network Affiliation(s)	N		C	A	
d. No. of TV Homes#	405		411	372	
e. Net Weekly Circulation#	294		280	250	
f. Average Daily Circulation#	218		215	165	
g. No. of Ownerships	1		1	1	
67. Orlando/Daytona Beach, Fla.	Cowles	Outlet	Mid-Florida		
a. Call Letters	WESH	WDBO	WFTV		
b. Channel No.	2	6	9		
c. Network Affiliation(s)	N	C	A		
d. No. of TV Homes#	393	354	369		
e. Net Weekly Circulation#	277	285	291		
f. Average Daily Circulation#	193	210	184		
g. No. of Ownerships	3	3	1		
68. Rochester, N.Y.	Rust Craft	Gannett	Channel 13		
a. Call Letters	WROC	WHEC	WOKR		
b. Channel No.	8	10	13		
c. Network Affilation(s)	N	C	A		
d. No. of TV Homes#	386	386	386		
e. Net Weekly Circulation#	286	271	269		
f. Average Daily Circulation#	213	197	181		
g. No. of Ownerships	4	1	1		
69. Shreveport, La.			KTBS	KCMC	KSLA
a. Call Letters			KTBS	KTAL	KSLA
b. Channel No.			3	6	12
c. Network Affiliation(s)			A	N	C
d. No. of TV Homes#			386	373	365
e. Net Weekly Circulation#			281	274	265
f. Average Daily Circulation#			193	193	206
g. No. of Ownerships			1	1	2
70. Wilkes-Barre/Scranton, Pa.	Taft		Scranton Bcstg.	WBRE	
a. Call Letters	WNEP		WDAU	WBRE	
b. Channel No.	16		22	28	
c. Network Affiliation(s)	A		C	N	
d. No. of TV Homes#	432		494	419	
e. Net Weekly Circulation#	274		265	276	
f. Average Daily Circulation#	195		189	205	
g. No. of Ownerships	3		3	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956		
66. Quad City (Davenport, Ia./ Rock Island/Moline, Ill.)	Palmer		Rock Island		
a. Call Letters	WOC		WHBF		
b. Channel No.	6		4		
c. Network Affiliation(s)	N		A/C		
d. No. of Sets#	318		318		
g. No. of Ownerships	1		1		
67. Orlando/Daytona Beach, Fla.	Perry		Orlando Bcstg.		
a. Call letters	WESH		WDBO		
b. Channel No.	2		6		
c. Network Affiliation(s)	Ind.		A/C/N		
d. No. of Sets#	174		174		
g. No. of Ownerships	1		1		
68. Rochester, N.Y.	Trans-continent	Gannett	Veterans Bcstg.		
a. Call Letters	WROC	WHEC	WVET		
b. Channel No.	5	10	10		
c. Network Affiliation(s)	A/N	C/A	A/C		
d. No. of Sets#	365	327	327		
g. No. of Ownerships	2	1	1		
69. Shreveport, La.			KTBS	KCMC	Shreveport
a. Call Letters			KTBS	KCMC	KSLA
b. Channel No.			3	6	12
c. Network Affiliation(s)			A/N	A/C	A/C
d. No. of Sets#			250	100	166
g. No. of Ownerships			1	1	1
70. Wilkes-Barre/Scranton, Pa.	Scranton		Scranton Bcstg.	WBRE	Wyoming Valley
a. Call Letters	WARM		WGBI	WBRE	WILK
b. Channel No.	16		22	28	34
c. Network Affiliation(s)	A		C	N	A
d. No. of Sets#	250		310	317	316
g. No. of Ownerships	1		1	1	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966
71. Little Rock, Ark.	Mullins	Griffin-Leake			Clay
a. Call Letters	KARK	KATV			KTHV
b. Channel No.	4	7			11
c. Network Affiliation(s)	N	A			C
d. No. of TV Homes#	355	322			332
e. Net Weekly Circulation#	268	229			256
f. Average Daily Circulation#	205	149			194
g. No. of Ownerships	2	1			1
72. Jacksonville, Fla.	Washington Post	Wometco	Rust Craft		
a. Call Letters	WJXT	WFGA	WJKS		
b. Channel No.	4	12	17		
c. Network Affiliation(s)	C	N	A		
d. No. of TV Homes#	356	278	-		
e. Net Weekly Circulation#	266	224	-		
f. Average Daily Circulation#	220	167	-		
g. No. of Ownerships	2	1	1		
73. Champaign/Decatur/Springfield/Danville, Ill.	Lindsay Schaub	Balaban*	Balaban+	Balaban+	LIN Bcstg.
a. Call Letters	WCIA	WICS	WCHU	WICD	WTVP
b. Channel No.	3	20	15	24	17
c. Network Affiliation(s)	C	N	N	N	A
d. No. of TV Homes#	415	315*	+	+	218
e. Net Weekly Circulation#	262	206*	+	+	154
f. Average Daily Circulation#	208	148*	+	+	106
g. No. of Ownerships	1	1	1	2	4
74. Cedar Rapids/Waterloo, Iowa	WMT TV	Black Hawk			Cedar Rapids
a. Call Letters	WMT	KWWL			KCRG
b. Channel No.	2	7			9
c. Network Affiliation(s)	C	N			A
d. No. of TV Homes#	384	296			318
e. Net Weekly Circulation#	262	201			227
f. Average Daily Circulation#	207	122			145
g. No. of Ownerships	1	1			2
75. Mobile, Ala./Pensacola, Fla.	Rollins	Royal Street			WKRG
a. Call Letters	WEAR	WALA			WKRG
b. Channel No.	3	10			5
c. Network Affiliation(s)	A	N			C
d. No. of TV Homes#	303	329			351
e. Net Weekly Circulation#	232	229			261
f. Average Daily Circulation#	163	154			202
g. No. of Ownerships	2	2			2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956		
71. Little Rock, Ark.	Griffin-Leake	Clay	Ark Radio & Equip.		
a. Call Letters	KATV	KTHV	KARK		
b. Channel No.	7	11	4		
c. Network Affiliation(s)	A	C	N		
d. No. of Sets#	160	160	160		
g. No. of Ownerships	1	1	1		
72. Jacksonville, Fla.	Washington Post	Perry			
a. Call Letters	WMBR	WJHP			
b. Channel No.	4	36			
c. Network Affiliation(s)	A/C	A/N			
d. No. of Sets#	250	99			
g. No. of Ownerships	2	1			
73. Champaign/Decatur/Springfield/Danville, Ill.	Balaban	Gannett	Lindsay Schaub	Prairie	
a. Call Letters	WICS	WDAN	WCIA	WTVP	
b. Channel No.	20	24	3	17	
c. Network Affiliation(s)	A/N	A	N/C	A	
d. No. of Sets#	105	50	330	190	
g. No. of Ownerships	1	1	1	1	
74. Cedar Rapids/Waterloo, Iowa			WMT TV	Black Hawk	Cedar Rapids
a. Call Letters			WMT	KWWL	KCRG
b. Channel No.			2	7	9
c. Network Affiliation(s)			C	N	A
d. No. of Sets#			220	325	326
g. No. of Ownerships			1	1	2
75. Mobile, Ala./Pensacola, Fla.			Gulfport Bcstg.	WKRG	Pape
a. Call Letters			WEAR	WKRG	WALA
b. Channel No.			3	5	10
c. Network Affiliation(s)			A/C	C	A/N
d. No. of Sets#			152	167	155
g. No. of Ownerships			1	1	1

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966	
76. Des Moines, Iowa	Cowles	Palmer			Iowa State Univ.	
a. Call Letters	KRNT	WHO			WOI	
b. Channel No.	8	13			5	
c. Network Affiliation(s)	C	N			A	
d. No. of TV Homes#	316	301			340	
e. Net Weekly Circulation#	234	234			251	
f. Average Daily Circulation#	181	168			164	
g. No. of Ownerships	1	1			1	
77. Spokane, Wash.	King	Morgan Murphy			KHQ	
a. Call Letters	KREM	KXLY			KHQ	
b. Channel No.	2	4			6	
c. Network Affiliation(s)	A	C			N	
d. No. of TV Homes#	331	344			331	
e. Net Weekly Circulation#	241	248			248	
f. Average Daily Circulation#	171	188			188	
g. No. of Ownerships	2	3			1	
78. Springfield/Holyoke, Mass.	Spring-field	Spring-field*	Spring-field+	New-house		
a. Call Letters	WJZB	WWLP	WRLP	WHYN		
b. Channel No.	14	22	32	40		
c. Network Affiliation(s)	N	N	N	A		
d. No. of TV Homes#	-	502*	+	445		
e. Net Weekly Circulation#	-	243*	+	196		
f. Average Daily Circulation#	-	162*	+	128		
g. No. of Ownerships	2	1	1	2		
79. Jackson, Miss.	Murchison	Lanford				
a. Call Letters	WLBT	WJTV				
b. Channel No.	3	12				
c. Network Affiliation(s)	A/N	C				
d. No. of TV Homes#	341	317				
e. Net Weekly Circulation#	242	210				
f. Average Daily Circulation#	188	157				
g. No. of Ownerships	1	2				
80. Knoxville, Tenn.	South-eastern				Peoples	South Central
a. Call Letters	WBIR				WATE	WTVK
b. Channel No.	10				6	26
c. Network Affiliation(s)	C				N	A
d. No. of TV Homes#	385				340	132
e. Net Weekly Circulation#	239				234	52
f. Average Daily Circulation#	180				190	25
g. No. of Ownerships	3				2	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956		
76. Des Moines, Iowa	Cowles	Palmer	Iowa State Univ.		
a. Call Letters	KRNT	WHO	WOI		
b. Channel No.	8	13	5		
c. Network Affiliation(s)	C	N	A		
d. No. of Sets#	294	294	300		
g. No. of Ownerships	1	1	1		
77. Spokane, Wash.			Louis Wasmer	KXLY	KHQ
a. Call Letters			KREM	KXLY	KHQ
b. Channel No.			2	4	6
c. Network Affiliation(s)			A	C	N
d. No. of Sets#			188	188	188
g. No. of Ownerships			1	2	1
78. Springfield/Holyoke, Mass.			Spring-field	Hampden Hampshire	
a. Call Letters			WWLP	WHYN	
b. Channel No.			22	55	
c. Network Affiliation(s)			A/N	C	
d. No. of Sets#			240	225	
g. No. of Ownerships			1	2	
79. Jackson, Miss.	Lanford		Murchison		
a. Call Letters	WJTV		WLBT		
b. Channel No.	12		3		
c. Network Affiliation(s)	A/C		N		
d. No. of Sets#	156		156		
g. No. of Ownerships	2		1		
80. Knoxville, Tenn.	Life & Cas. Ins.	Taft	South Central		
a. Call Letters	WATE	WBIR	WTVK		
b. Channel No.	6	10	26		
c. Network Affiliation(s)	A/N	C	A		
d. No. of Sets#	176	176	162		
g. No. of Ownerships	1	1	2		

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
81. Madison, Wisc.	Morgan Murphy	Wisconsin Valley	Midcontinent	
a. Call Letters	WISC	WMTV	WKOW	
b. Channel No.	3	15	27	
c. Network Affiliation(s)	C	N	A	
d. No. of TV Homes#	475	206	176	
e. Net Weekly Circulation#	233	122	114	
f. Average Daily Circulation#	155	78	72	
g. No. of Ownerships	1	4	2	
82. Binghamton, N.Y.	Triangle	Gannett		WBJA TV
a. Call Letters	WNBF	WINR		WBJA
b. Channel No.	12	40		34
c. Network Affiliation(s)	C	N		A
d. No. of TV Homes#	481	183		145
e. Net Weekly Circulation#	231	86		75
f. Average Daily Circulation#	170	54		43
g. No. of Ownerships	2	2		1
83. Columbia, S.C.	Cosmos	Bahakel		Palmetto
a. Call Letters	WIS	WOLO		WNOK
b. Channel No.	10	25		19
c. Network Affiliation(s)	N	A		C
d. No. of TV Homes#	379	82		82
e. Net Weekly Circulation#	226	58		65
f. Average Daily Circulation#	164	30		43
g. No. of Ownerships	1	2		1
84. Columbus, Ga.	Martin Theatres			Columbus Bcstg.
a. Call Letters	WTVM			WRBL
b. Channel No.	9			3
c. Network Affiliation(s)	A/N			C/N
d. No. of TV Homes#	388			324
e. Net Weekly Circulation#	223			194
f. Average Daily Circulation#	146			133
g. No. of Ownerships	1			1
85. Baton Rouge, La.	Manship			Guaranty Bcstg.
a. Call Letters	WBRZ			WAFB
b. Channel No.	2			9
c. Network Affiliation(s)	A/N			A/C
d. No. of TV Homes #	393			304
e. Net Weekly Circulation#	222			164
f. Average Daily Circulation#	156			111
g. No. of Ownerships	1			2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
81. Madison, Wisc.	Morgan Murphy	Monona Bcstg.	Bartell
a. Call Letters	WISC	WKOW	WMTV
b. Channel No.	3	27	33
c. Network Affiliation(s)	C	A	N
d. No. of Sets#	309	130	132
g. No. of Ownerships	1	1	1
82. Binghamton, N.Y.	Triangle		
a. Call Letters	WNBF		
b. Channel No.	12		
c. Network Affiliation(s)	A/C/N		
d. No. of Sets#	458		
g. No. of Ownerships	2		
83. Columbia, S.C.		Cosmos	Palmetto
a. Call Letters		WIS	WNOK
b. Channel No.		10	67
c. Network Affiliation(s)		A/N	C
d. No. of Sets#		221	200
g. No. of Ownerships		1	1
84. Columbus, Ga.	Martin Theatres	Columbus Bcstg.	
a. Call Letters	WDAK	WRBL	
b. Channel No.	28	4	
c. Network Affiliation(s)	N	A/C	
d. No. of Sets#	114	193	
g. No. of Ownerships	1	1	
85. Baton Rouge, La.	Royal Street	Manship	
a. Call Letters	WAFB	WBRZ	
b. Channel No.	28	2	
c. Network Affiliation(s)	C	A/N	
d. No. of Sets#	104	175	
g. No. of Ownerships	1	1	

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
86. West Palm Beach, Fla.	Scripps-Howard	Beacom	Garden
a. Call Letters	WPTV	WTVX	WEAT
b. Channel No.	5	34	12
c. Network Affiliation(s)	N	C	A
d. No. of TV Homes#	643	-	529
e. Net Weekly Circulation#	222	-	159
f. Average Daily Circulation#	132	-	76
g. No. of Ownerships	3	1	4

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966	
87. Cape Girardeau, Mo./Paducah, Ky./Harrisburg, Ill.	Turner-Farrar*	Turner-Farrar+	Paducah Newspapers	Hirsch Bcstg.
a. Call Letters	WSIL	KPOB	WPSD	KFVS
b. Channel No.	3	15	6	12
c. Network Affiliation(s)	A	A	N	C
d. No. of TV Homes#	280*	+	315	296
e. Net Weekly Circulation#	155*	+	210	221
f. Average Daily Circulation#	86*	+	152	180
g. No. of Ownerships	1	1	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		
88. Evansville, Ind.	Polaris	George Norton	Gilmore
a. Call Letters	WTVW	WFIE	WEHT
b. Channel No.	7	14	25
c. Network Affiliation(s)	A	N	C
d. No. of TV Homes#	326	200	171
e. Net Weekly Circulation#	219	132	125
f. Average Daily Circulation#	157	95	91
g. No. of Ownerships	2	2	3

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
89. Greenville/Washington/New Bern, N.C.	Park	Thoms	North Carolina
a. Call Letters	WNCT	WNBE	WITN
b. Channel No.	9	12	7
c. Network Affiliation(s)	C	A	N
d. No. of TV Homes#	313	142	369
e. Net Weekly Circulation#	209	84	219
f. Average Daily Circulation#	160	51	151
g. No. of Ownerships	2	1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			
90. Sioux Falls, S.D.	Midcontinent*	Midcontinent+	Midcontinent+	Barnes
a. Call Letters	KELO	KDLO	KPLO	KSOO
b. Channel No.	11	3	6	13
c. Network Affiliation(s)	A/C	A/C	A/C	A/N
d. No. of TV Homes#	284*	+	+	149
e. Net Weekly Circulation#	218*	+	+	97
f. Average Daily Circulation#	176*	+	+	64
g. No. of Ownerships	1	1	1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956	
86. West Palm Beach, Fla.	RKO		Buck & Granik	
a. Call Letters	WEAT		WPTV	
b. Channel No.	12		5	
c. Network Affiliation(s)	A/C		C/N	
d. No. of Sets#	90		98	
g. No. of Ownerships	2		1	
87. Cape Girardeau, Mo./Paducah, Ky./Harrisburg, Ill.			Hirsch Bcstg.	Turner-Farrar
a. Call Letters			KFVS	WSIL
b. Channel No.			12	22
c. Network Affiliation(s)			C/N	A/N
d. No. of Sets#			162	34
g. No. of Ownerships			1	1
88. Evansville, Ind.	George Norton		Evansville	WEHT
a. Call Letters	WFIE		WTVW	WEHT
b. Channel No.	62		7	50
c. Network Affiliation(s)	N		A	C
d. No. of Sets#	140		175	150
g. No. of Ownerships	2		1	1
89. Greenville/Washington/New Bern, N.C.			North Carolina	Carolina Bcstg.
a. Call letters			WITN	WNCT
b. Channel No.			7	9
c. Network Affiliation(s)			N	A/C
d. No. of Sets#			165	177
g. No. of Ownerships			2	1
90. Sioux Falls, S.D.	Midcontinent*	Midcontinent+		
a. Call Letters	KELO	KDLO		
b. Channel No.	11	3		
c. Network Affiliation(s)	A/C/N	A/C/N		
d. No. of Sets#	186*	+		
g. No. of Ownerships	1	1		

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966						SINGLE-OWNER STATIONS: 1966		
91. Fresno, Calif.	McClatchy	Triangle	Carl McConnell				Golden and Fawns		
a. Call Letters	KMJ	KFRE	KJEO				KAIL		
b. Channel No.	24	30	47				53		
c. Network Affiliation(s)	N	C	A				Ind.		
d. No. of TV Homes#	295	295	295				-		
e. Net Weekly Circulation#	216	212	207				-		
f. Average Daily Circulation#	165	156	139				-		
g. No. of Ownerships	1	2	3				1		
92. Chattanooga, Tenn.	Rust Craft	Martin Theatres	Park						
a. Call Letters	WRCB	WTVC	WDEF						
b. Channel No.	3	9	12						
c. Network Affiliation(s)	N	A	C						
d. No. of TV Homes#	310	297	256						
e. Net Weekly Circulation#	206	195	178						
f. Average Daily Circulation#	157	135	127						
g. No. of Ownerships	3	2	2						
93. Lincoln/Hastings/ Kearney, Nebr.	Bi-States*	Bi-States+	Bi-States+	Bi-States+	Fetzer*	Fetzer+	Nebraska		
a. Call Letters	KHOL	KHTL	KHPL	KHQL	KOLN	KGIN	KHAS		
b. Channel No.	13	4	6	8	10	11	5		
c. Network Affiliation(s)	A	A	A	A	C	C	N		
d. No. of TV Homes#	188*	+	+	+	265*	+	151		
e. Net Weekly Circulation#	140*	+	+	+	201*	+	94		
f. Average Daily Circulation#	92*	+	+	+	162*	+	63		
g. No. of Ownerships	1	1	1	1	2	1	1		
94. Rockford, Ill.	Gannett	Balaban					Rock River		
a. Call Letters	WREX	WTVO					WCEE		
b. Channel No.	13	39					23		
c. Network Affiliation(s)	A/C	N					C		
d. No. of TV Homes#	285	169					-		
e. Net Weekly Circulation#	195	117					-		
f. Average Daily Circulation#	144	88					-		
g. No. of Ownerships	2	1					1		
95. Youngstown, Ohio							Vindicator Printing	WKBN Bcstg.	WYTV
a. Call Letters							WFMJ	WKBN	WYTV
b. Channel No.							21	27	33
c. Network Affiliation(s)							N	C	A
d. No. of TV Homes#							404	422	318
e. Net Weekly Circulation#							194	189	182
f. Average Daily Circulation#							136	137	116
g. No. of Ownerships							2	1	3

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956			
91. Fresno, Calif.				Cal. Inland Bcstg.	McClatchy	UHF Tlcstg.	O'Neill Bcstg.
a. Call Letters				KFRE	KMJ	KVVG	KJEO
b. Channel No.				12	24	27	47
c. Network Affiliation(s)				C	N	Ind.	A
d. No. of Sets#				253	170	171	170
g. No. of Ownerships				1	1	2	1
92. Chattanooga, Tenn.				Mountain City TV	WROM	WDEF	
a. Call Letters				WRGP	WROM	WDEF	
b. Channel No.				3	9	12	
c. Network Affiliation(s)				A/N	Ind.	A/C	
d. No. of Sets#				211	174	211	
g. No. of Ownerships				1	1	1	
93. Lincoln/Hastings/Kearney, Nebr.	Bi-States*	Bi-States+	Fetzer	Nebraska			
a. Call Letters	KHOL	KHPL	KOLN	KHAS			
b. Channel No.	13	6	10	5			
c. Network Affiliation(s)	A/C	A/C	A/C	N			
d. No. of Sets#	120*	+	157	81			
g. No. of Ownerships	1	1	2	1			
94. Rockford, Ill.	Balaban			Greater Rockford			
a. Call Letters	WTVO			WREX			
b. Channel No.	39			13			
c. Network Affiliation(s)	N			A/C			
d. No. of Sets#	175			278			
g. No. of Ownerships	1			1			
95. Youngstown, Ohio				Vindicator Printing	WKBN Bcstg.		
a. Call Letters				WFMJ	WKBN		
b. Channel No.				21	27		
c. Network Affiliation(s)				N	C/A		
d. No. of Sets#				203	203		
g. No. of Ownerships				2	1		

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966	
96. Augusta, Ga.	Fuqua	Rust Craft			
a. Call Letters	WJBF	WRDW			
b. Channel No.	6	12			
c. Network Affiliation(s)	A/N	C			
d. No. of TV Homes#	335	265			
e. Net Weekly Circulation#	192	149			
f. Average Daily Circulation#	138	99			
g. No. of Ownerships	1	4			
97. South Bend/Elkhart, Ind.	Truth Publ.			Michiana Tlcstg.	South Bend Tribune
a. Call Letters	WSJV			WNDU	WSBT
b. Channel No.	28			16	22
c. Network Affiliation(s)	A			N	C
d. No. of TV Homes#	250			283	276
e. Net Weekly Circulation#	179			183	188
f. Average Daily Circulation#	124			125	153
g. No. of Ownerships	1			1	1
98. Peoria, Ill.	Kerr-McGee*	Kerr-McGee+	Lindsay-Schaub	Mid-America Media	
a. Call Letters	WEEK	WEEQ	WMBD	WIRL	
b. Channel No.	25	35	31	19	
c. Network Affiliation(s)	N	N	C	A	
d. No. of TV Homes#	299*	+	316	311	
e. Net Weekly Circulation#	185*	+	180	175	
f. Average Daily Circulation#	135*	+	133	116	
g. No. of Ownerships	1	1	2	4	
99. Fort Wayne, Ind.	Corinthian	Sarkes Tarzian	Truth Publ.		
a. Call Letters	WANE	WPTA	WKJG		
b. Channel No.	15	21	33		
c. Network Affiliation(s)	C	A	N		
d. No. of TV Homes#	295	280	280		
e. Net Weekly Circulation#	182	174	181		
f. Average Daily Circulation#	139	120	124		
g. No. of Ownerships	3	1	2		
100. Albuquerque, N.M.	Hubbard	Steinman		New Mexico	
a. Call Letters	KOB	KOAT		KGGM	
b. Channel No.	4	7		13	
c. Network Affiliation(s)	N	A		C	
d. No. of TV Homes#	208	208		208	
e. Net Weekly Circulation#	179	176		174	
f. Average Daily Circulation#	135	128		130	
g. No. of Ownerships	3	3		1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956		
96. Augusta, Ga.	Martin Theatres	Radio Augusta		
a. Call Letters	WJBF	WRDW		
b. Channel No.	6	12		
c. Network Affiliation(s)	N/A	C		
d. No. of Sets#	213	182		
g. No. of Ownerships	1	2		
97. South Bend/Elkhart, Ind.		Michiana Tlcstg.	Truth Publ.	South Bend Tribune
a. Call Letters		WNDU	WSJV	WSBT
b. Channel No.		16	28	34
c. Network Affiliation(s)		N	A	C
d. No. of Sets#		177	216	182
g. No. of Ownerships		1	1	1
98. Peoria, Ill.	Kerr-McGee	WBLN	Hilltop Bcstg.	
a. Call Letters	WEEK	WBLN	WTVH	
b. Channel No.	43	15	19	
c. Network Affiliation(s)	N	A	A/C	
d. No. of Sets#	172	55	184	
g. No. of Ownerships	1	2	2	
99. Fort Wayne, Ind.	Universal Bcstg.	Northeast Indiana		
a. Call Letters	WINT	WKJG		
b. Channel No.	15	33		
c. Network Affiliation(s)	A/C	N		
d. No. of Sets#	140	164		
g. No. of Ownerships	2	1		
100. Albuquerque, N.M.	Time-Life	Alvarado	New Mexico	
a. Call Letters	KOB	KOAT	KGGM	
b. Channel No.	4	7	13	
c. Network Affiliation(s)	N	A	C	
d. No. of Sets#	82	88	82	
g. No. of Ownerships	1	1	1	

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966	
101. Bristol, Va./Johnson City, Tenn.	Park	Appalachian	
a. Call Letters	WJHL	WCYB	
b. Channel No.	11	5	
c. Network Affiliation(s)	A/C	A/N	
d. No. of TV Homes#	239	323	
e. Net Weekly Circulation#	142	178	
f. Average Daily Circulation#	110	128	
g. No. of Ownerships	3	1	
102. Beaumont/Port Arthur, Texas	Cannan/ Hobby	Texas Gold Coast	TV Broad-casters
a. Call Letters	KFDM	KPAC	KBMT
b. Channel No.	6	4	12
c. Network Affiliation(s)	C	N	A
d. No. of TV Homes#	202	210	168
e. Net Weekly Circulation#	172	167	123
f. Average Daily Circulation#	135	114	67
g. No. of Ownerships	1/2**	2	2
103. Erie, Pa.	Southern	Dispatch	Jet Bcstg.
a. Call Letters	WSEE	WICU	WJET
b. Channel No.	35	12	24
c. Network Affiliation(s)	A/C	N	Ind.
d. No. of TV Homes#	153	300	-
e. Net Weekly Circulation#	79	162	-
f. Average Daily Circulation#	58	127	-
g. No. of Ownerships	1	1	1
104. Burlington, Vt./ Plattsburgh, N.Y.	Rollins Tlcstg.	Mt. Mans-field TV	
a. Call Letters	WPTZ	WCAX	
b. Channel No.	5	3	
c. Network Affiliation(s)	A/N	C	
d. No. of TV Homes#	182	232	
e. Net Weekly Circulation#	109	158	
f. Average Daily Circulation#	76	131	
g. No. of Ownerships	2	1	
105. Lafayette, La.	Texas Bcstg.	Acadian	
a. Call Letters	KLFY	KATC	
b. Channel No.	10	3	
c. Network Affiliation(s)	C	A	
d. No. of TV Homes#	241	230	
e. Net Weekly Circulation#	156	156	
f. Average Daily Circulation#	120	104	
g. No. of Ownerships	2	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
101. Bristol, Va./Johnson City, Tenn.		Appalachian	WJHL
a. Call Letters		WCYB	WJHL
b. Channel No.		5	11
c. Network Affiliation(s)		A/N	A/C
d. No. of Sets#		191	191
g. No. of Ownerships		1	1
102. Beaumont/Port Arthur, Texas	Cannan		
a. Call Letters	KFDM		
b. Channel No.	6		
c. Network Affiliation(s)	A/C		
d. No. of Sets#	115		
g. No. of Ownerships	1		
103. Erie, Pa.	Southern	Dispatch	
a. Call Letters	WSEE	WICU	
b. Channel No.	35	12	
c. Network Affiliation(s)	A/C	A/N	
d. No. of Sets#	85	223	
g. No. of Ownerships	1	1	
104. Burlington, Vt./Plattsburgh, N.Y.		Mt. Mansfield TV	Rollins Tlcstg.
a. Call Letters		WCAX	WPTZ
b. Channel No.		3	5
c. Network Affiliation(s)		C	A/N
d. No. of Sets#		151	150
g. No. of Ownerships		1	2
105. Lafayette, La.		Camelia Bcstg.	
a. Call Letters		KLFY	
b. Channel No.		10	
c. Network Affiliation(s)		C	
d. No. of Sets#		75	
g. No. of Ownerships		1	

In thousands.
** This represents the number of ownerships for the interests held by each of the present majority owners.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966

106. Springfield, Mo.	Lester Cox (group-owned)	Independent Bcstg. (single-owner)
a. Call Letters	KYTV	KTTS
b. Channel No.	3	10
c. Network Affiliation(s)	A/N	A/C
d. No. of TV Homes#	241	151
e. Net Weekly Circulation#	155	112
f. Average Daily Circulation#	121	87
g. No. of Ownerships	1	1

107. Duluth, Minn./Superior, Wisc.	Tribune (group-owned)	Ridder (group-owned)	WMT TV (group-owned)
a. Call Letters	KDAL	WDSM	WDIO
b. Channel No.	3	6	10
c. Network Affiliation(s)	A/C	A/N	A
d. No. of TV Homes#	180	169	-
e. Net Weekly Circulation#	154	145	-
f. Average Daily Circulation#	134	122	-
g. No. of Ownerships	2	1	1

108. Austin/Rochester, Minn./ Mason City, Iowa	Lee (group-owned)	Black Hawk (group-owned)	Southern Minn. (single-owner)
a. Call Letters	KGLO	KMMT	KROC
b. Channel No.	3	6	10
c. Network Affiliation(s)	C	A	N
d. No. of TV Homes#	193	204	295
e. Net Weekly Circulation#	107	112	153
f. Average Daily Circulation#	75	66	100
g. No. of Ownerships	1	2	2

109. Terre Haute, Ind.	Illiana Tlcstg. (single-owner)	Wabash Valley (single-owner)
a. Call Letters	WTWO	WTHI
b. Channel No.	2	10
c. Network Affiliation(s)	N	A/C
d. No. of TV Homes#	-	254
e. Net Weekly Circulation#	-	152
f. Average Daily Circulation#	-	119
g. No. of Ownerships	1	1

110. Joplin, Mo./Pittsburg, Kansas	Lester Cox (group-owned)	Gilmore (group-owned)
a. Call Letters	KOAM	KODE
b. Channel No.	7	12
c. Network Affiliation(s)	A/N	A/C
d. No. of TV Homes#	192	173
e. Net Weekly Circulation#	150	123
f. Average Daily Circulation#	122	93
g. No. of Ownerships	1	3

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
106. Springfield, Mo.	Lester Cox	Independent Bcstg.	
a. Call Letters	KYTV	KTTS	
b. Channel No.	3	10	
c. Network Affiliation(s)	A/N	C	
d. No. of Sets#	110	111	
g. No. of Ownerships	1	1	
107. Duluth, Minn./Superior, Wisc.	Ridder	Red River Bcstg.	
a. Call Letters	WDSM	KDAL	
b. Channel No.	6	3	
c. Network Affiliation(s)	N	A/C	
d. No. of Sets#	128	125	
g. No. of Ownerships	1	1	
108. Austin/Rochester, Minn./Mason City, Iowa	Lee	Minn. Iowa	Southern Minn.
a. Call Letters	KGLO	KMMT	KROC
b. Channel No.	3	6	10
c. Network Affiliation(s)	C	A	N
d. No. of Sets#	102	115	110
g. No. of Ownerships	1	1	1
109. Terre Haute, Ind.		Wabash Valley	
a. Call Letters		WTHI	
b. Channel No.		10	
c. Network Affiliation(s)		A/C/N	
d. No. of Sets#		252	
g. No. of Ownerships		1	
110. Joplin, Mo./Pittsburg, Kansas	Lester Cox	Air Time	
a. Call Letters	KOAM	KODE	
b. Channel No.	7	12	
c. Network Affiliation(s)	A/N	C	
d. No. of Sets#	142	116	
g. No. of Ownerships	1	1	

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966							SINGLE-OWNER STATIONS: 1966		
	Comm. Honolulu*	Comm. Honolulu+	Comm. Honolulu+	Western Telestns*	Western Telestns+	Glas-mann*	Glas-mann+	J. S. Young Assoc.	Maui Publ.	Hawaiian Paradise
111. Hawaii										
a. Call Letters	KHON	KAII	KHAW	KHVH	KHVO	KGMB	KPUA	KMAU	KMVI	KIKU
b. Channel No.	2	7	11	4	13	9	9	3	12	13
c. Network Affiliation(s)	N	N	N	A	A	C	C	C	A	Ind.
d. No. of TV Homes#	153*	+	+	153*	+	153*	+	-	-	130
e. Net Weekly Circulation#	144*	+	+	150*	+	142*	+	-	-	73
f. Average Daily Circulation#	86*	+	+	120*	+	96*	+	-	-	28
g. No. of Ownerships	3	2	2	4	2	4	4	2	1	1

112. Albany, Ga.	Herald Publ.
a. Call Letters	WALB
b. Channel No.	10
c. Network Affiliation(s)	A/N
d. No. of TV Homes#	233
e. Net Weekly Circulation#	149
f. Average Daily Circulation#	109
g. No. of Ownerships	1

113. Montgomery, Ala.	Cosmos	Gay-Bell	Bahakel
a. Call Letters	WSFA	WCOV	WKAB
b. Channel No.	12	20	32
c. Network Affiliation(s)	N	C	A
d. No. of TV Homes#	252	101	75
e. Net Weekly Circulation#	148	58	47
f. Average Daily Circulation#	117	42	26
g. No. of Ownerships	3	2	4

114. Florence, S.C.	Jefferson Standard
a. Call Letters	WBTW
b. Channel No.	13
c. Network Affiliation(s)	C/N
d. No. of TV Homes#	195
e. Net Weekly Circulation#	147
f. Average Daily Circulation#	114
g. No. of Ownerships	1

115. Utica, N.Y.	Paul Harron
a. Call Letters	WKTV
b. Channel No.	2
c. Network Affiliation(s)	A/N
d. No. of TV Homes#	220
e. Net Weekly Circulation#	147
f. Average Daily Circulation#	105
g. No. of Ownerships	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956				SINGLE-OWNER STATIONS: 1956	
111. Hawaii	J. Elroy McCaw	Hawaiian Bcstg.*	Hawaiian Bcstg.+	Hawaiian Bcstg.+	TV Corp. of America	Maui Publ.
a. Call Letters	KONA	KGMB	KMAU	KHBC	KULA	KMVI
b. Channel No.	2	9	3	9	4	12
c. Network Affiliation(s)	N	C	C	C	A	N
d. No. of Sets#	125	-	-	-	125	-
g. No. of Ownerships	2	1	1	1	2	1
112. Albany, Ga.					Herald Publ.	
a. Call Letters					WALB	
b. Channel No.					10	
c. Network Affiliation(s)					A/N	
d. No. of Sets#					51	
g. No. of Ownerships					1	
113. Montgomery, Ala.	WKY TV				WCOV	
a. Call Letters	WSFA				WCOV	
b. Channel No.	12				20	
c. Network Affiliation(s)	A/N				C	
d. No. of Sets#	147				81	
g. No. of Ownerships	2				1	
114. Florence, S.C.	Jefferson Standard					
a. Call Letters	WBTW					
b. Channel No.	8					
c. Network Affiliation(s)	A/C/N					
d. No. of Sets#	144					
g. No. of Ownerships	1					
115. Utica, N.Y.					Copper City	
a. Call Letters					WKTV	
b. Channel No.					13	
c. Network Affiliation(s)					A/C/N	
d. No. of Sets#					212	
g. No. of Ownerships					1	

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966	
116. Waco/Temple, Texas	Texas Bcstg.*	Texas Bcstg.+			Bell Publ	
a. Call Letters	KWTX	KBTX			KCEN	
b. Channel No.	10	3			6	
c. Network Affiliation(s)	A/C	A/C			N	
d. No. of TV Homes#	238*	+			220	
e. Net Weekly Circulation#	146*	+			133	
f. Average Daily Circulation#	111*	+			99	
g. No. of Ownerships	1	1			1	
117. Sioux City, Iowa	Wisconsin Valley				KTIV	
a. Call Letters	KVTV				KTIV	
b. Channel No.	9				4	
c. Network Affiliation(s)	A/C				A/N	
d. No. of TV Homes#	197				221	
e. Net Weekly Circulation#	130				145	
f. Average Daily Circulation#	99				114	
g. No. of Ownerships	3				2	
118. Tallahassee, Fla./ Thomasville, Ga.					John Phipps	
a. Call Letters					WCTV	
b. Channel No.					6	
c. Network Affiliation(s)					C	
d. No. of TV Homes#					240	
e. Net Weekly Circulation#					145	
f. Average Daily Circulation#					108	
g. No. of Ownerships					1	
119. Charleston, S.C.	Reeves				First Charleston	WCSC
a. Call Letters	WUSN				WCIV	WCSC
b. Channel No.	2				4	5
c. Network Affiliation(s)	A				N	C
d. No. of TV Homes#	229				180	218
e. Net Weekly Circulation#	144				120	145
f. Average Daily Circulation#	95				80	113
g. No. of Ownerships	2				1	1
120. Cadillac/Traverse City, Mich.	Midwestern*	Midwestern+	Fetzer*	Fetzer+		
a. Call Letters	WPBN	WTOM	WWTV	WWUP		
b. Channel No.	7	4	9	10		
c. Network Affiliation(s)	A/N	A/N	A/C	A/C		
d. No. of TV Homes#	130*	+	239*	+		
e. Net Weekly Circulation#	91*	+	141*	+		
f. Average Daily Circulation#	65*	+	104*	+		
g. No. of Ownerships	1	1	2	1		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956		
116. Waco/Temple, Texas	Texas Bcstg.	Bell Publ.		
a. Call Letters	KWTX	KCEN		
b. Channel No.	10	6		
c. Network Affiliation(s)	A/C	N		
d. No. of Sets#	140	158		
g. No. of Ownerships	1	1		
117. Sioux City, Iowa	Cowles	KTIV		
a. Call Letters	KVTV	KTIV		
b. Channel No.	9	4		
c. Network Affiliation(s)	A/C	A/N		
d. No. of Sets#	183	204		
g. No. of Ownerships	1	1		
118. Tallahassee, Fla./ Thomasville, Ga.		John Phipps		
a. Call Letters		WCTV		
b. Channel No.		6		
c. Network Affiliation(s)		A/C/N		
d. No. of Sets#		87		
g. No. of Ownerships		1		
119. Charleston, S.C.		Southern Bcstg.	WCSC	
a. Call Letters		WUSN	WCSC	
b. Channel No.		2	5	
c. Network Affiliation(s)		A/N	A/C	
d. No. of Sets#		245	136	
g. No. of Ownerships		1	1	
120. Cadillac/Traverse City, Mich.		Midwest-ern	Spartan Bcstg.	Washtenau Bcstg.
a. Call Letters		WPBN	WWTV	WPAG
b. Channel No.		7	13	20
c. Network Affiliation(s)		N	A/C	Ind.
d. No. of Sets#		62	388	22
g. No. of Ownerships		1	1	1

\# In thousands.
* Parent station; includes circulation data for satellite.
\+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966
121. Amarillo, Texas	Garvey-Stauffer	John Walton	Bass*	Bass+	
a. Call Letters	KGNC	KVII	KFDA	KFDW	
b. Channel No.	4	7	10	12	
c. Network Affiliation(s)	N	A	C	C	
d. No. of TV Homes#	145	149	150*	+	
e. Net Weekly Circulation#	127	128	140*	+	
f. Average Daily Circulation#	98	83	115*	+	
g. No. of Ownerships	3	3	2	5	
122. Austin, Texas	Texas Bcstg.				Southwest Republic
a. Call Letters	KTBC				KHFI
b. Channel No.	2				42
c. Network Affiliation(s)	A/C/N				Ind.
d. No. of TV Homes#	200				81
e. Net Weekly Circulation#	140				19
f. Average Daily Circulation#	108				12
g. No. of Ownerships	1				1
123. Monroe, La./El Dorado, Ark.	Fuqua				Noe Enterprises
a. Call Letters	KTVE				KNOE
b. Channel No.	10				8
c. Network Affiliation(s)	A/N				A/C
d. No. of TV Homes#	193				225
e. Net Weekly Circulation#	134				139
f. Average Daily Circulation#	94				107
g. No. of Ownerships	3				1
124. Wichita Falls, Texas/Lawton, Okla.	Cannan	Paul Harron	Drewry		
a. Call Letters	KFDX	KAUZ	KSWO		
b. Channel No.	3	6	7		
c. Network Affiliation(s)	N	C	A		
d. No. of TV Homes#	190	180	177		
e. Net Weekly Circulation#	139	137	128		
f. Average Daily Circulation#	105	105	88		
g. No. of Ownerships	1	3	1		
125. LaCrosse, Wisc.	Lee				
a. Call Letters	WKBT				
b. Channel No.	8				
c. Network Affiliation(s)	A/C/N				
d. No. of TV Homes#	268				
e. Net Weekly Circulation#	135				
f. Average Daily Circulation#	98				
g. No. of Ownerships	1				

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956	
121. Amarillo, Texas	Bass		Globe News	
a. Call Letters	KFDA		KGNC	
b. Channel No.	10		4	
c. Network Affiliation(s)	A/C		N	
d. No. of Sets#	89		90	
g. No. of Ownerships	2		2	
122. Austin, Texas	Texas Bcstg.			
a. Call Letters	KTBC			
b. Channel No.	7			
c. Network Affiliation(s)	A/C/N			
d. No. of Sets#	163			
g. No. of Ownerships	1			
123. Monroe, La./El Dorado, Ark.			Noe Enterprises	South Arkansas
a. Call Letters			KNOE	KRBB
b. Channel No.			8	10
c. Network Affiliation(s)			A/C/N	A/N
d. No. of Sets#			306	49
g. No. of Ownerships			1	1
124. Wichita Falls, Texas/ Lawton, Okla.	Cannan	Drewry	Lee Optical	
a. Call Letters	KFDX	KSWO	KSYD	
b. Channel No.	3	7	6	
c. Network Affiliation(s)	N	A	C	
d. No. of Sets#	124	82	113	
g. No. of Ownerships	1	1	2	
125. LaCrosse, Wisc.	Lee			
a. Call Letters	WKBT			
b. Channel No.	8			
c. Network Affiliation(s)	A/C/N			
d. No. of Sets#	130			
g. No. of Ownerships	1			

In thousands.
* Parent station; includes circulation data for satellite.
\+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
126. Hannibal, Mo./Quincy, Ill.	Lee	Lindsay-Schaub	
a. Call Letters	KHQA	WGEM	
b. Channel No.	7	10	
c. Network Affiliation(s)	A/C	A/N	
d. No. of TV Homes#	191	196	
e. Net Weekly Circulation#	134	134	
f. Average Daily Circulation#	106	101	
g. No. of Ownerships	1	1	
127. St. Joseph, Mo.			Panax
a. Call Letters			KFEQ
b. Channel No.			2
c. Network Affiliation(s)			A/C
d. No. of TV Homes#			332
e. Net Weekly Circulation#			131
f. Average Daily Circulation#			70
g. No. of Ownerships			4
128. Bluefield, W.Va.			Daily Telegraph
a. Call Letters			WHIS
b. Channel No.			6
c. Network Affiliation(s)			N
d. No. of TV Homes#			250
e. Net Weekly Circulation#			130
f. Average Daily Circulation#			90
g. No. of Ownerships			1
129. Chico/Redding, Calif.	Redwood		Golden Empire
a. Call Letters	KRCR		KHSL
b. Channel No.	7		12
c. Network Affiliation(s)	A/N		C
d. No. of TV Homes#	122		359
e. Net Weekly Circulation#	82		130
f. Average Daily Circulation#	61		85
g. No. of Ownerships	2		1
130. Fargo, N.D.	Jamestown	Polaris	WDAY
a. Call Letters	KXJB	KTHI	WDAY
b. Channel No.	4	11	6
c. Network Affiliation(s)	C	A	N
d. No. of TV Homes#	159	153	159
e. Net Weekly Circulation#	125	111	128
f. Average Daily Circulation#	88	76	97
g. No. of Ownerships	1	2	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
126. Hannibal, Mo./Quincy, Ill.	Lee	Quincy Bcstg.	
a. Call Letters	KHQA	WGEM	
b. Channel No.	7	10	
c. Network Affiliation(s)	C	N/C	
d. No. of Sets#	175	150	
g. No. of Ownerships	1	1	
127. St. Joseph, Mo.		Midland Bcstg.	
a. Call Letters		KFEQ	
b. Channel No.		2	
c. Network Affiliation(s)		A/C	
d. No. of Sets#		167	
g. No. of Ownerships		2	
128. Bluefield, W.VA.		Daily Telegraph	
a. Call Letters		WHIS	
b. Channel No.		6	
c. Network Affiliation(s)		N	
d. No. of Sets#		174	
g. No. of Ownerships		1	
129. Chico/Redding, Calif.		Carl McConnell	Golden Empire
a. Call Letters		KVIP	KHSL
b. Channel No.		7	12
c. Network Affiliation(s)		N	A/C
d. No. of Sets#		55	71
g. No. of Ownerships		1	1
130. Fargo, N.D.	Jamestown	Barnes, Hetland, Reineke	Community
a. Call Letters	KXJB	WDAY	KNOX
b. Channel No.	4	6	10
c. Network Affiliation(s)	C	A/N	N
d. No. of Sets#	125	90	37
g. No. of Ownerships	1	1	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
131. Topeka, Kansas	Garvey-Stauffer			
a. Call Letters	WIBW			
b. Channel No.	13			
c. Network Affiliation(s)	C			
d. No. of TV Homes#	174			
e. Net Weekly Circulation#	126			
f. Average Daily Circulation#	96			
g. No. of Ownerships	2			
132. Dothan, Ala.				WTVY
a. Call Letters				WTVY
b. Channel No.				4
c. Network Affiliation(s)				A/C
d. No. of TV Homes#				245
e. Net Weekly Circulation#				125
f. Average Daily Circulation#				84
g. No. of Ownerships				1
133. Columbia/Jefferson City, Mo.	Jefferson*	Jefferson+		Univ. of Missouri
a. Call Letters	KRCG	KMOS		KOMU
b. Channel No.	13	6		8
c. Network Affiliation(s)	A/C	A/C		A/N
d. No. of TV Homes#	170*	+		142
e. Net Weekly Circulation#	123*	+		113
f. Average Daily Circulation#	95*	+		83
g. No. of Ownerships	1	3		1
134. Tucson, Ariz.	Steinman	Gilmore	Gene Autry	
a. Call Letters	KVOA	KGUN	KOLD	
b. Channel No.	4	9	13	
c. Network Affiliation(s)	N	A	C	
d. No. of TV Homes#	160	152	148	
e. Net Weekly Circulation#	123	120	118	
f. Average Daily Circulation#	94	83	86	
g. No. of Ownerships	4	5	1	
135. El Paso, Texas	Trigg-Vaughn	John Walton		Tri-State Bcstg.
a. Call Letters	KROD	KELP		KTSM
b. Channel No.	4	13		9
c. Network Affiliation(s)	C	A		N
d. No. of TV Homes#	127	125		127
e. Net Weekly Circulation#	120	108		122
f. Average Daily Circulation#	97	68		96
g. No. of Ownerships	2	3		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
131. Topeka, Kansas		Topeka Bcstg.
a. Call Letters		WIBW
b. Channel No.		13
c. Network Affiliation(s)		A/C
d. No. of Sets#		586
g. No. of Ownerships		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
132. Dothan, Ala.		WTVY
a. Call Letters		WTVY
b. Channel No.		9
c. Network Affiliation(s)		A/C
d. No. of Sets#		38
g. No. of Ownerships		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956		
133. Columbia/Jefferson City, Mo.		Milton Himlein	Univ. of Missouri	Jefferson
a. Call Letters		KDRO	KOMU	KRCG
b. Channel No.		6	8	13
c. Network Affiliation(s)		Ind.	A/N	C
d. No. of Sets#		60	101	103
g. No. of Ownerships		1	1	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
134. Tuscon, Ariz.	Gene Autry	Arizona Bcstg.	Tuscon
a. Call Letters	KOPO	KVOA	[illegible]
b. Channel No.	13	4	9
c. Network Affiliation(s)	C	A/N	Ind.
d. No. of Sets#	54	59	68
g. No. of Ownerships	1	2	1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
135. El Paso, Texas		Roderick Bcstg.	Tri-State Bcstg.
a. Call Letters		KROD	KTSM
b. Channel No.		4	9
c. Network Affiliation(s)		C	N
d. No. of Sets#		100	88
g. No. of Ownerships		1	1

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966	
136. Wausau, Wisc.	Wisconsin Valley	Midcontinent		
a. Call Letters	WSAU	WAOW		
b. Channel No.	7	9		
c. Network Affiliation(s)	A/C/N	A		
d. No. of TV Homes#	184	-		
e. Net Weekly Circulation#	121	-		
f. Average Daily Circulation#	94	-		
g. No. of Ownerships	1	1		
137. Santa Barbara, Calif.			KEY	Central Coast
a. Call Letters			KEYT	KCOY
b. Channel No.			3	12
c. Network Affiliation(s)			A	N
d. No. of TV Homes#			185	61
e. Net Weekly Circulation#			120	44
f. Average Daily Circulation#			69	27
g. No. of Ownerships			2	1
138. Wilmington, N.C.	Park		Cape Fear	
a. Call Letters	WECT		WWAY	
b. Channel No.	6		3	
c. Network Affiliation(s)	N		A	
d. No. of TV Homes#	185		171	
e. Net Weekly Circulation#	119		88	
f. Average Daily Circulation#	75		59	
g. No. of Ownerships	2		1	
139. Colorado Springs/Pueblo, Colo.	Metropolitan	Garvey-Stauffer	Pikes Peak Bcstg.	
a. Call Letters	KOAA	KKTV	KRDO	
b. Channel No.	5	11	13	
c. Network Affiliation(s)	N	C	A	
d. No. of TV Homes#	133	133	129	
e. Net Weekly Circulation#	109	119	119	
f. Average Daily Circulation#	81	94	90	
g. No. of Ownerships	3	2	2	
140. Lubbock, Texas	Grayson		Bryant Radio & TV	
a. Call Letters	KLBK		KCBD	
b. Channel No.	13		11	
c. Network Affiliation(s)	A/C		N	
d. No. of TV Homes#	139		154	
e. Net Weekly Circulation#	117		119	
f. Average Daily Circulation#	96		96	
g. No. of Ownerships	3		1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
136. Wausau, Wisc.	Wisconsin Valley	
a. Call Letters	WSAU	
b. Channel No.	7	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	99	
g. No. of Ownerships	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
137. Santa Barbara, Calif.		Santa Barbara Bcstg.
a. Call Letters		KEYT
b. Channel No.		3
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		228
g. No. of Ownerships		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
138. Wilmington, N.C.		WMFD
a. Call Letters		WMFD
b. Channel No.		6
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		77
g. No. of Ownerships		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956		
139. Colorado Springs/Pueblo, Colo.		Star Bcstg.	TV Colo.	Pikes Peak Bcstg.
a. Call Letters		KCSJ	KKTV	KRDO
b. Channel No.		5	11	13
c. Network Affiliation(s)		N	A/C	N
d. No. of Sets#		55	69	44
g. No. of Ownerships		2	1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
140. Lubbock, Texas	Texas Tlcstg.	Bryant Radio & TV
a. Call Letters	KDUB	KCBD
b. Channel No.	13	11
c. Network Affiliation(s)	C	A/N
d. No. of Sets#	131	134
g. No. of Ownerships	1	1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966					SINGLE-OWNER STATIONS: 1966		
141. Corpus Christi, Texas						South Texas	Gulf Coast	KSIX
a. Call Letters						KIII	KRIS	KZTV
b. Channel No.						3	6	10
c. Network Affiliation(s)						A	N	C
d. No. of TV Homes#						128	132	127
e. Net Weekly Circulation#						107	112	111
f. Average Daily Circulation#						74	84	89
g. No. of Ownerships						4	1	1
142. Lexington, Ky.	Gay-Bell	Taft						
a. Call Letters	WLEX	WKYT						
b. Channel No.	18	27						
c. Network Affiliation(s)	C/N	A/C						
d. No. of TV Homes#	182	176						
e. Net Weekly Circulation#	112	112						
f. Average Daily Circulation#	85	82						
g. No. of Ownerships	1	3						
143. Savannah, Ga.						WSAV	Savannah Bcstg.	
a. Call Letters						WSAV	WTOC	
b. Channel No.						3	11	
c. Network Affiliation(s)						A/N	A/C	
d. No. of TV Homes#						154	146	
e. Net Weekly Circulation#						111	101	
f. Average Daily Circulation#						85	75	
g. No. of Ownerships						1	1	
144. Yakima, Wash.	Cascade*	Cascade+	Cascade+	Columbia Empire*	Columbia Empire+			
a. Call Letters	KIMA	KLEW	KEPR	KNDO	KNDU			
b. Channel No.	29	3	19	23	25			
c. Network Affiliation(s)	A/C	A/C	A/C	N	N			
d. No. of TV Homes#	141*	+	+	102*	+			
e. Net Weekly Circulation#	109*	+	+	79*	+			
f. Average Daily Circulation#	86*	+	+	58*	+			
g. No. of Ownerships	2	2	2	2	1			
145. Macon, Ga.	South-eastern							
a. Call Letters	WMAZ							
b. Channel No.	13							
c. Network Affiliation(s)	A/C/N							
d. No. of TV Homes#	145							
e. Net Weekly Circulation#	109							
f. Average Daily Circulation#	91							
g. No. of Ownerships	2							

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956			SINGLE-OWNER STATIONS: 1956	
141. Corpus Christi, Texas				Gulf Coast	Coastal Bend
a. Call Letters				KRIS	KVDO
b. Channel No.				6	22
c. Network Affiliation(s)				N	A/C
d. No. of Sets#				80	59
g. No. of Ownerships				1	1
142. Lexington, Ky.				Gay-Bell	
a. Call Letters				WLEX	
b. Channel No.				18	
c. Network Affiliation(s)				A/C/N	
d. No. of Sets#				72	
g. No. of Ownerships				1	
143. Savannah, Ga.				WSAV	Savannah Bcstg.
a. Call Letters				WSAV	WTOC
b. Channel No.				3	11
c. Network Affiliation(s)				A/N	A/C
d. No. of Sets#				151	151
g. No. of Ownerships				1	1
144. Yakima, Wash.	Cascade*	Cascade+	Cascade+		
a. Call Letters	KIMA	KLEW	KEPR		
b. Channel No.	29	3	19		
c. Network Affiliation(s)	A/C/N	A/C/N	A/C/N		
d. No. of Sets#	83*	+	+		
g. No. of Ownerships	1	1	1		
145. Macon, Ga.				South-eastern	
a. Call Letters				WMAZ	
b. Channel No.				13	
c. Network Affiliation(s)				A/C/N	
d. No. of Sets#				106	
g. No. of Ownerships				1	

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
146. Bakersfield, Calif.	Time-Life	Harriscope		Kern County
a. Call Letters	KERO	KBAK		KLYD
b. Channel No.	23	29		17
c. Network Affiliation(s)	N	C		A
d. No. of TV Homes#	155	269		128
e. Net Weekly Circulation#	106	108		76
f. Average Daily Circulation#	71	69		51
g. No. of Ownerships	3	4		2
147. Odessa/Midland, Texas	Drewry	Trigg-Vaughn	John Walton	
a. Call Letters	KMID	KOSA	KVKM	
b. Channel No.	2	7	9	
c. Network Affiliation(s)	N	C	A	
d. No. of TV Homes#	128	131	125	
e. Net Weekly Circulation#	108	105	91	
f. Average Daily Circulation#	79	82	51	
g. No. of Ownerships	1	2	1	
148. Alexandria, Minn.	Barnes*	Barnes+		
a. Call Letters	KCMT	KNMT		
b. Channel No.	7	12		
c. Network Affiliation(s)	N	N		
d. No. of TV Homes#	173*	+		
e. Net Weekly Circulation#	104*	+		
f. Average Daily Circulation#	80*	+		
g. No. of Ownerships	1	1		
149. Abilene/Sweetwater, Texas	Bass*	Bass+	Grayson	
a. Call Letters	KRBC	KACB	KPAR	
b. Channel No.	9	3	12	
c. Network Affiliation(s)	A/N	A/N	A/C	
d. No. of TV Homes#	117*	+	86	
e. Net Weekly Circulation#	101*	+	61	
f. Average Daily Circulation#	83*	+	44	
g. No. of Ownerships	2	1	3	
150. Eugene, Oregon	Eugene			Liberty
a. Call Letters	KVAL			KEZI
b. Channel No.	13			9
c. Network Affiliation(s)	N			A
d. No. of TV Homes#	154			157
e. Net Weekly Circulation#	69			101
f. Average Daily Circulation#	50			67
g. No. of Ownerships	1			1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956
146. Bakersfield, Calif.	Chronicle Publ.		Kern County
a. Call Letters	KBAK		KERO
b. Channel No.	29		10
c. Network Affiliation(s)	A/C		N
d. No. of Sets#	110		155
g. No. of Ownerships	1		1
147. Odessa/Midland, Texas	Drewry		Trigg-Vaughn
a. Call Letters	KMID		KOSA
b. Channel No.	2		7
c. Network Affiliation(s)	A/N		C
d. No. of Sets#	78		79
g. No. of Ownerships	1		1
148. Alexandria, Minn.			
a. Call Letters			
b. Channel No.			
c. Network Affiliation(s)			
d. No. of Sets#			
g. No. of Ownerships			
149. Abilene/Sweetwater, Texas	Bass	Texas Tlcstg.	
a. Call Letters	KRBC	KPAR	
b. Channel No.	9	12	
c. Network Affiliation(s)	N	Ind.	
d. No. of Sets#	56	642	
g. No. of Ownerships	2	1	
150. Eugene, Oregon	Eugene		
a. Call Letters	KVAL		
b. Channel No.	13		
c. Network Affiliation(s)	A/N		
d. No. of Sets#	77		
g. No. of Ownerships	1		

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966
151. Cheyenne, Wyo.	Frontier*	Frontier+	Frontier+		
a. Call Letters	KFBC	KTVS	KSTF		
b. Channel No.	5	3	10		
c. Network Affiliation(s)	A/C/N	A/C/N	A/C/N		
d. No. of TV Homes#	149*	+	+		
e. Net Weekly Circulation#	99*	+	+		
f. Average Daily Circulation#	71*	+	+		
g. No. of Ownerships	1	1	1		
152. Bismarck, N.D.	Meyer*	Meyer+	Meyer+	James-town	
a. Call Letters	KFYR	KUMV	KMOT	KXMB	
b. Channel No.	5	8	10	12	
c. Network Affiliation(s)	A/N	A/N	A/N	A/C	
d. No. of TV Homes#	120*	+	+	44	
e. Net Weekly Circulation#	96*	+	+	28	
f. Average Daily Circulation#	79*	+	+	20	
g. No. of Ownerships	1	1	1	1	
153. Tyler, Texas	Buford-Pengra				
a. Call Letters	KLTV				
b. Channel No.	7				
c. Network Affiliation(s)	A/N				
d. No. of TV Homes#	141				
e. Net Weekly Circulation#	93				
f. Average Daily Circulation#	64				
g. No. of Ownerships	1				
154. Mankato, Minn.	Lee				
a. Call Letters	KEYC				
b. Channel No.	12				
c. Network Affiliation(s)	C				
d. No. of TV Homes#	161				
e. Net Weekly Circulation#	91				
f. Average Daily Circulation#	61				
g. No. of Ownerships	1				
155. Panama City, Fla.	Herald Publ.				
a. Call Letters	WJHG				
b. Channel No.	7				
c. Network Affiliation(s)	A/N				
d. No. of TV Homes#	154				
e. Net Weekly Circulation#	89				
f. Average Daily Circulation#	56				
g. No. of Ownerships	3				

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956
151. Cheyenne, Wyo.	Frontier*	Frontier+	
a. Call Letters	KFBC	KSTF	
b. Channel No.	5	10	
c. Network Affiliation(s)	A/C/N	A/C/N	
d. No. of Sets#	46*	+	
g. No. of Ownerships	1	1	
152. Bismarck, N.D.	James-town		Meyer
a. Call Letters	KBMB		KFYR
b. Channel No.	12		5
c. Network Affiliation(s)	Ind.		A/N
d. No. of Sets#	23		32
g. No. of Ownerships	1		1
153. Tyler, Texas			Buford-Pengra
a. Call Letters			KLTV
b. Channel No.			7
c. Network Affiliation(s)			A/C/N
d. No. of Sets#			109
g. No. of Ownerships			1
154. Mankato, Minn.			
a. Call Letters			
b. Channel No.			
c. Network Affiliation(s)			
d. No. of Sets#			
g. No. of Ownerships			
155. Panama City, Fla.			J. D. Manly
a. Call Letters			WJDM
b. Channel No.			7
c. Network Affiliation(s)			A/C/N
d. No. of Sets#			31
g. No. of Ownerships			1

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966	
156. Oak Hill, W. Va.			Robert Thomas Jr.	
a. Call Letters			WOAY	
b. Channel No.			4	
c. Network Affiliation(s)			C	
d. No. of TV Homes#			242	
e. Net Weekly Circulation#			88	
f. Average Daily Circulation#			58	
g. No. of Ownerships			1	
157. Bangor, Maine	Maine	Community	Down East TV	
a. Call Letters	WLBZ	WABI	WEMT	
b. Channel No.	2	5	7	
c. Network Affiliation(s)	N	C	Ind.	
d. No. of TV Homes#	144	163	-	
e. Net Weekly Circulation#	88	88	-	
f. Average Daily Circulation#	68	69	-	
g. No. of Ownerships	2	1	1	
158. Las Vegas, Nevada	Donald W. Reynolds		Las Vegas	TV Co. of America
a. Call Letters	KORK		KLAS	KSHO
b. Channel No.	3		8	13
c. Network Affiliation(s)	N		C	A
d. No. of TV Homes#	100		84	83
e. Net Weekly Circulation#	88		80	76
f. Average Daily Circulation#	71		64	43
g. No. of Ownerships	1		2	4
159. Meridian, Miss.	Rosenbaum			
a. Call Letters	WTOK			
b. Channel No.	11			
c. Network Affiliation(s)	A/C			
d. No. of TV Homes#	154			
e. Net Weekly Circulation#	87			
f. Average Daily Circulation#	66			
g. No. of Ownerships	1			
160. Huntsville, Ala.			North Alabama	Rocket City TV
a. Call Letters			WHNT	WAAY
b. Channel No.			19	31
c. Network Affiliation(s)			C	A
d. No. of TV Homes#			129	124
e. Net Weekly Circulation#			86	65
f. Average Daily Circulation#			63	40
g. No. of Ownerships			1	2

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956	
156. Oak Hill, W. Va.		Robert Thomas Jr.	
a. Call Letters		WOAY	
b. Channel No.		4	
c. Network Affiliation(s)		A	
d. No. of Sets#		96	
g. No. of Ownerships		1	
157. Bangor, Maine	Community	Murray Carpenter	
a. Call Letters	WABI	WTWO	
b. Channel No.	5	2	
c. Network Affiliation(s)	A	C	
d. No. of Sets#	96	96	
g. No. of Ownerships	1	1	
158. Las Vegas, Nevada	Donald W. Reynolds	Las Vegas	TV Co. of America
a. Call Letters	KLRJ	KLAS	KSHO
b. Channel No.	2	8	13
c. Network Affiliation(s)	A/N	C	Ind.
d. No. of Sets#	31	35	27
g. No. of Ownerships	1	1	1
159. Meridian, Miss.		Rosenbaum	
a. Call Letters		WTOK	
b. Channel No.		11	
c. Network Affiliation(s)		A/C/N	
d. No. of Sets#		83	
g. No. of Ownerships		1	
160. Huntsville, Ala.			
a. Call Letters			
b. Channel No.			
c. Network Affiliation(s)			
d. No. of Sets#			
g. No. of Ownerships			

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
161. Eau Claire, Wisc.	Post			
a. Call Letters	WEAU			
b. Channel No.	13			
c. Network Affiliation(s)	N			
d. No. of TV Homes#	155			
e. Net Weekly Circulation#	85			
f. Average Daily Circulation#	59			
g. No. of Ownerships	2			
162. Boise, Idaho	Bonneville Internatl.	KTVB*	KTVB+	
a. Call Letters	KBOI	KTVB	KTVR	
b. Channel No.	2	7	13	
c. Network Affiliation(s)	A/C	A/N	A/N	
d. No. of TV Homes#	112	112*	+	
e. Net Weekly Circulation#	83	84*	+	
f. Average Daily Circulation#	69	65*	+	
g. No. of Ownerships	1	1	1	
163. Lower Rio Grande Valley (Harlingen/Weslaco, Texas)	Manship			Harbenito
a. Call Letters	KRGV			KGBT
b. Channel No.	5			4
c. Network Affiliation(s)	A/N			A/C
d. No. of TV Homes#	85			85
e. Net Weekly Circulation#	83			83
f. Average Daily Circulation#	71			72
g. No. of Ownerships	5			1
164. Ottumwa, Iowa	Post			
a. Call Letters	KTVO			
b. Channel No.	3			
c. Network Affiliation(s)	A/C/N			
d. No. of TV Homes#	142			
e. Net Weekly Circulation#	83			
f. Average Daily Circulation#	56			
g. No. of Ownerships	2			
165. Biloxi, Miss.				WLOX
a. Call Letters				WLOX
b. Channel No.				13
c. Network Affiliation(s)				A
d. No. of TV Homes#				129
e. Net Weekly Circulation#				77
f. Average Daily Circulation#				41
g. No. of Ownerships				1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
161. Eau Claire, Wisc.	Morgan Murphy	
a. Call Letters	WEAU	
b. Channel No.	13	
c. Network Affiliation(s)	A/N	
d. No. of Sets#	70	
g. No. of Ownerships	1	
162. Boise, Idaho	Bonneville Internatl.	KTVB
a. Call Letters	KBOI	KIDO
b. Channel No.	2	7
c. Network Affiliation(s)	C	A/N
d. No. of Sets#	67	85
g. No. of Ownerships	1	1
163. Lower Rio Grande Valley (Harlingen/Weslaco, Texas)	Texas Bcstg.	Harbenito
a. Call Letters	KRGV	KGBT
b. Channel No.	5	4
c. Network Affiliation(s)	N	A/C
d. No. of Sets#	84	63
g. No. of Ownerships	1	1
164. Ottumwa, Iowa		KBIZ
a. Call Letters		KTVO
b. Channel No.		3
c. Network Affiliation(s)		N/C
d. No. of Sets#		223
g. No. of Ownerships		1
165. Biloxi, Miss.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		

In thousands.
* Parent station; includes circulation data for satellite.
\+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
166. Lake Charles, La.		Calcasieu
a. Call Letters		KPLC
b. Channel No.		7
c. Network Affiliation(s)		N
d. No. of TV Homes#		141
e. Net Weekly Circulation#		73
f. Average Daily Circulation#		48
g. No. of Ownerships		2
167. Ada, Okla.		Eastern Oklahoma
a. Call Letters		KTEN
b. Channel No.		10
c. Network Affiliation(s)		A
d. No. of TV Homes#		143
e. Net Weekly Circulation#		70
f. Average Daily Circulation#		44
g. No. of Ownerships		1
168. Harrisonburg, Va.	Gilmore	
a. Call Letters	WSVA	
b. Channel No.	3	
c. Network Affiliation(s)	A/C/N	
d. No. of TV Homes#	182	
e. Net Weekly Circulation#	69	
f. Average Daily Circulation#	46	
g. No. of Ownerships	4	
169. Fort Smith, Ark.	Donald W. Reynolds	
a. Call Letters	KFSA	
b. Channel No.	5	
c. Network Affiliation(s)	A/C/N	
d. No. of TV Homes#	115	
e. Net Weekly Circulation#	69	
f. Average Daily Circulation#	54	
g. No. of Ownerships	4	
170. Alexandria, La.	Lanford	
a. Call Letters	KALB	
b. Channel No.	5	
c. Network Affiliation(s)	N	
d. No. of TV Homes#	119	
e. Net Weekly Circulation#	69	
f. Average Daily Circulation#	51	
g. No. of Ownerships	2	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
166. Lake Charles, La.	Lanford	KTAG Associates
a. Call Letters	KPLC	KTAG
b. Channel No.	7	25
c. Network Affiliation(s)	A/N	C
d. No. of Sets#	103	69
g. No. of Ownerships	1	1
167. Ada, Okla.		Eastern Oklahoma
a. Call Letters		KTEN
b. Channel No.		10
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		93
g. No. of Ownerships		1
168. Harrisonburg, Va.	Transcon-tinent	
a. Call Letters	WSVA	
b. Channel No.	3	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	143	
g. No. of Ownerships	2	
169. Fort Smith, Ark.	Donald W. Reynolds	
a. Call Letters	KFSA	
b. Channel No.	22	
c. Network Affiliation(s)	A/N	
d. No. of Sets#	41	
g. No. of Ownerships	1	
170. Alexandria, La.	Lanford	
a. Call Letters	KALB	
b. Channel No.	5	
c. Network Affiliation(s)	N	
d. No. of Sets#	133	
g. No. of Ownerships	2	

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
171. Bowling Green, Ky.		Argus
a. Call Letters		WLTV
b. Channel No.		13
c. Network Affiliation(s)		Ind.
d. No. of TV Homes#		206
e. Net Weekly Circulation#		68
f. Average Daily Circulation#		23
g. No. of Ownerships		1
172. Columbus, Miss.		Columbus
a. Call Letters		WCBI
b. Channel No.		4
c. Network Affiliation(s)		A/C
d. No. of TV Homes#		137
e. Net Weekly Circulation#		68
f. Average Daily Circulation#		50
g. No. of Ownerships		1
173. Watertown/Carthage, N.Y.		Brockway
a. Call Letters		WWNY
b. Channel No.		7
c. Network Affiliation(s)		A/C
d. No. of TV Homes#		99
e. Net Weekly Circulation#		66
f. Average Daily Circulation#		57
g. No. of Ownerships		1
174. Hattiesburg/Laurel, Miss.	Rosenbaum	
a. Call Letters	WDAM	
b. Channel No.	7	
c. Network Affiliation(s)	A/N	
d. No. of TV Homes#	95	
e. Net Weekly Circulation#	65	
f. Average Daily Circulation#	48	
g. No. of Ownerships	4	
175. Clarksburg/Fairmont, W. Va.	Beacom	Northern W. Virginia
a. Call Letters	WDTV	WBOY
b. Channel No.	5	12
c. Network Affiliation(s)	A	C/N
d. No. of TV Homes#	167	107
e. Net Weekly Circulation#	58	65
f. Average Daily Circulation#	29	45
g. No. of Ownerships	2	3

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
171. Bowling Green, Ky.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
172. Columbus, Miss.		Columbus
a. Call Letters		WCBI
b. Channel No.		4
c. Network Affiliation(s)		C
d. No. of Sets#		45
g. No. of Ownerships		1
173. Watertown/Carthage, N.Y.		Brockway
a. Call Letters		WCNY
b. Channel No.		7
c. Network Affiliation(s)		A/C
d. No. of Sets#		85
g. No. of Ownerships		1
174. Hattiesburg/Laurel, Miss.	Royal Street	
a. Call Letters	WDAM	
b. Channel No.	9	
c. Network Affiliation(s)	A/N	
d. No. of Sets#	55	
g. No. of Ownerships	1	
175. Clarksburg/Fairmont, W. Va.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
176. Billings Mont.	Garry-Owen	Crain-Snyder	
a. Call Letters	KOOK	KULR	
b. Channel No.	2	8	
c. Network Affiliation(s)	A/C	N	
d. No. of TV Homes#	78	67	
e. Net Weekly Circulation#	63	53	
f. Average Daily Circulation#	52	38	
g. No. of Ownerships	1	2	
177. Reno, Nevada	Donald W. Reynolds		Circle L
a. Call Letters	KOLO		KCRL
b. Channel No.	8		4
c. Network Affiliation(s)	A/C		N
d. No. of TV Homes#	71		57
e. Net Weekly Circulation#	61		46
f. Average Daily Circulation#	47		38
g. No. of Ownerships	1		1
178. Ardmore, Okla.	Texas Bcstg.		
a. Call Letters	KXII		
b. Channel No.	12		
c. Network Affiliation(s)	N		
d. No. of TV Homes#	120		
e. Net Weekly Circulation#	61		
f. Average Daily Circulation#	40		
g. No. of Ownerships	2		
179. Bellingham, Wash.	Wometco		
a. Call Letters	KVOS		
b. Channel No.	12		
c. Network Affiliation(s)	C		
d. No. of TV Homes#	114		
e. Net Weekly Circulation#	61		
f. Average Daily Circulation#	35		
g. No. of Ownerships	2		
180. Idaho Falls/Pocatello, Idaho	Bonneville Internatl.		Eastern Idaho
a. Call Letters	KID		KIFI
b. Channel No.	3		8
c. Network Affiliation(s)	A/C		N
d. No. of TV Homes#	75		67
e. Net Weekly Circulation#	60		52
f. Average Daily Circulation#	51		40
g. No. of Ownerships	1		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
		Garry-Owen
176. Billings, Mont.		
a. Call Letters		KOOK
b. Channel No.		2
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		29
g. No. of Ownerships		1
	Donald W. Reynolds	
177. Reno, Nevada		
a. Call Letters	KOLO	
b. Channel No.	8	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	54	
g. No. of Ownerships	1	
		John F. Easley
178. Ardmore, Okla.		
a. Call Letters		KVSO
b. Channel No.		12
c. Network Affiliation(s)		N
d. No. of Sets#		50
g. No. of Ownerships		1
179. Bellingham, Wash.		KVOS
a. Call Letters		KVOS
b. Channel No.		12
c. Network Affiliation(s)		C
d. No. of Sets#		256
g. No. of Ownerships		1
	Bonneville Internatl.	
180. Idaho Falls/Pocatello, Idaho		
a. Call Letters	KID	
b. Channel No.	3	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	54	
g. No. of Ownerships	1	

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966				SINGLE-OWNER STATIONS: 1966	
181. Marquette, Mich.	Post					
a. Call Letters	WLUC					
b. Channel No.	6					
c. Network Affiliation(s)	C					
d. No. of TV Homes#	82					
e. Net Weekly Circulation#	58					
f. Average Daily Circulation#	48					
g. No. of Ownerships	2					
182. Visalia, Calif.					Sierra Bcstg.	
a. Call Letters.					KICU	
b. Channel No.					43	
c. Network Affiliation(s)					Ind.	
d. No. of TV Homes#					216	
e. Net Weekly Circulation#					55	
f. Average Daily Circulation#					13	
g. No. of Ownerships					1	
183. Lima, Ohio					WLOK	
a. Call Letters					WIMA	
b. Channel No.					35	
c. Network Affiliation(s)					A/N	
d. No. of TV Homes#					125	
e. Net Weekly Circulation#					54	
f. Average Daily Circulation#					35	
g. No. of Ownerships					2	
184. Roswell, New Mexico					John Barnett	Taylor Bcstg.
a. Call Letters					KSWS	KBIM
b. Channel No.					8	10
c. Network Affiliation(s)					A/N	C
d. No. of TV Homes#					76	-
e. Net Weekly Circulation#					54	-
f. Average Daily Circulation#					40	-
g. No. of Ownerships					1	1
185. Rapid City, S. D.	Duhamel*	Duhamel+	Heart of Black Hills*	Heart of Black Hills+		
a. Call Letters	KOTA	KDUH	KRSD	KDSJ		
b. Channel No.	3	4	7	5		
c. Network Affiliation(s)	A/C	A/C	N	N		
d. No. of TV Homes#	66*	+	53*	+		
e. Net Weekly Circulation#	54*	+	26*	+		
f. Average Daily Circulation#	47*	+	12*	+		
g. No. of Ownerships	1	1	1	1		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
	Wisconsin Valley	
181. Marquette, Mich.		
a. Call Letters	WDMJ	
b. Channel No.	6	
c. Network Affiliation(s)	C	
d. No. of Sets#	50	
g. No. of Ownerships	1	
182. Visalia, Calif.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
183. Lima, Ohio		WLOK
a. Call Letters		WIMA
b. Channel No.		35
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		70
g. No. of Ownerships		2
		John Barnett
184. Roswell, New Mexico		
a. Call Letters		KSWS
b. Channel No.		8
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		71
g. No. of Ownerships		1
185. Rapid City, S. D.		Duhamel
a. Call Letters		KOTA
b. Channel No.		3
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		18
g. No. of Ownerships		1

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
186. Great Falls, Mont.	Crain-Snyder	Harriscope	
a. Call Letters	KRTV	KFBB	
b. Channel No.	3	5	
c. Network Affiliation(s)	N	A/C	
d. No. of TV Homes#	74	60	
e. Net Weekly Circulation#	52	47	
f. Average Daily Circulation#	40	37	
g. No. of Ownerships	1	3	
187. Jackson, Tenn.			Dixie Bcstg.
a. Call Letters			WDXI
b. Channel No.			7
c. Network Affiliation(s)			A/C
d. No. of TV Homes#			103
e. Net Weekly Circulation#			52
f. Average Daily Circulation#			35
g. No. of Ownerships			1
188. Casper, Wyo.	Harriscope		
a. Call Letters	KTWO		
b. Channel No.	2		
c. Network Affiliation(s)	A/C/N		
d. No. of TV Homes#	76		
e. Net Weekly Circulation#	51		
f. Average Daily Circulation#	41		
g. No. of Ownerships	1		
189. Eureka, Calif.	Carl McConnell		Calif. Oregon Radio
a. Call Letters	KVIQ		KIEM
b. Channel No.	6		3
c. Network Affiliation(s)	A/N		C
d. No. of TV Homes#	60		60
e. Net Weekly Circulation#	48		50
f. Average Daily Circulation#	37		44
g. No. of Ownerships	3		2
190. Butte, Montana	Garry-Owen		
a. Call Letters	KXLF		
b. Channel No.	4		
c. Network Affiliation(s)	A/C/N		
d. No. of TV Homes#	65		
e. Net Weekly Circulation#	48		
f. Average Daily Circulation#	39		
g. No. of Ownerships	2		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
186. Great Falls, Mont.		Wilkins Bcstg.
a. Call Letters		KFBB
b. Channel No.		5
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		30
g. No. of Ownerships		1
187. Jackson, Tenn.		Dixie Bcstg.
a. Call Letters		WDXI
b. Channel No.		7
c. Network Affiliation(s)		C
d. No. of Sets#		102
g. No. of Ownerships		1
188. Casper, Wyo.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
189. Eureka, Calif.	Redwood	
a. Call Letters	KIEM	
b. Channel No.	3	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	35	
g. No. of Ownerships	1	
190. Butte, Montana		Television Montana
a. Call Letters		KXLF
b. Channel No.		4
c. Network Affiliation(s)		A/N
d. No. of Sets#		45
g. No. of Ownerships		1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966		SINGLE-OWNER STATIONS: 1966
191. Medford, Oregon	Redwood		Radio Medford
a. Call Letters	KTVM		KMED
b. Channel No.	5		10
c. Network Affiliation(s)	A/C		A/N
d. No. of TV Homes#	79		58
e. Net Weekly Circulation#	44		35
f. Average Daily Circulation#	36		26
g. No. of Ownerships	1		1
192. Hays, Kansas	KAYS*	KAYS+	
a. Call Letters	KAYS	KLOE	
b. Channel No.	7	10	
c. Network Affiliation(s)	A/C	A/C	
d. No. of TV Homes#	70*	+	
e. Net Weekly Circulation#	43*	+	
f. Average Daily Circulation#	33*	+	
g. No. of Ownerships	1	4	
193. Aberdeen, S. D.	Jamestown		
a. Call Letters	KXAB		
b. Channel No.	9		
c. Network Affiliation(s)	A/N		
d. No. of TV Homes#	70		
e. Net Weekly Circulation#	43		
f. Average Daily Circulation#	27		
g. No. of Ownerships	1		
194. Greenwood, Miss.	Rahakel		
a. Call Letters	WABG		
b. Channel No.	6		
c. Network Affiliation(s)	C		
d. No. of TV Homes#	87		
e. Net Weekly Circulation#	42		
f. Average Daily Circulation#	29		
g. No. of Ownerships	1		
195. Salisbury, Md.	A. S. Abell		
a. Call Letters	WBOC		
b. Channel No.	16		
c. Network Affiliation(s)	A/C/N		
d. No. of TV Homes#	65		
e. Net Weekly Circulation#	42		
f. Average Daily Circulation#	34		
g. No. of Ownerships	2		

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
191. Medford, Oregon	Redwood	
a. Call Letters	KBES	
b. Channel No.	5	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	40	
g. No. of Ownerships	1	
192. Hays, Kansas		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
193. Aberdeen, S. D.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
194. Greenwood, Miss.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
195. Salisbury, Md.		Peninsula Bcstg.
a. Call Letters		WBOC
b. Channel No.		16
c. Network Affiliation(s)		A/C
d. No. of Sets#		57
g. No. of Ownerships		1

In thousands.
* Parent station; includes circulation data for satellite.
+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
196. Jonesboro, Ark.		George T. Hernreich
a. Call Letters		KAIT
b. Channel No.		8
c. Network Affiliation(s)		A
d. No. of TV Homes#		111
e. Net Weekly Circulation#		41
f. Average Daily Circulation#		21
g. No. of Ownerships		1
197. Tupelo, Miss.		WTWV
a. Call Letters		WTWV
b. Channel No.		9
c. Network Affiliation(s)		Ind.
d. No. of TV Homes#		97
e. Net Weekly Circulation#		40
f. Average Daily Circulation#		25
g. No. of Ownerships		1
198. Minot, N. D.		KXMC
a. Call Letters		KXMC
b. Channel No.		13
c. Network Affiliation(s)		A/C
d. No. of TV Homes#		52
e. Net Weekly Circulation#		40
f. Average Daily Circulation#		33
g. No. of Ownerships		2
199. Decatur, Ala.		Tennessee Valley
a. Call Letters		WMSL
b. Channel No.		23
c. Network Affiliation(s)		N
d. No. of TV Homes#		112
e. Net Weekly Circulation#		39
f. Average Daily Circulation#		21
g. No. of Ownerships		1
200. Akron, Ohio		Summit Radio
a. Call Letters		WAKR
b. Channel No.		49
c. Network Affiliation(s)		A
d. No. of TV Homes#		214
e. Net Weekly Circulation#		38
f. Average Daily Circulation#		13
g. No. of Ownerships		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
196. Jonesboro, Ark.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
197. Tupelo, Miss.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
198. Minot, N. D.	James-town	
a. Call Letters	KCJB	
b. Channel No.	13	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	-	
g. No. of Ownerships	1	
199. Decatur, Ala.		Tennessee Valley
a. Call Letters		WMSL
b. Channel No.		23
c. Network Affiliation(s)		C
d. No. of Sets#		34
g. No. of Ownerships		1
200. Akron, Ohio	Summit Radio	
a. Call Letters	WAKR	
b. Channel No.	49	
c. Network Affiliation(s)	A	
d. No. of Sets#	140	
g. No. of Ownerships	1	

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966			SINGLE-OWNER STATIONS: 1966
201. Ensign, Kansas				Southwest Kansas
a. Call Letters				KTVC
b. Channel No.				6
c. Network Affiliation(s)				C
d. No. of TV Homes#				50
e. Net Weekly Circulation#				36
f. Average Daily Circulation#				27
g. No. of Ownerships				1
202. Grand Junction/Montrose, Colo.	Rex Howell*	Rex Howell+	Rex Howell+	
a. Call Letters	KREX	KREZ	KREY	
b. Channel No.	5	6	10	
c. Network Affiliation(s)	A/C/N	A/C/N	A/C/N	
d. No. of TV Homes#	35*	+	+	
e. Net Weekly Circulation#	35*	+	+	
f. Average Daily Circulation#	22*	+	+	
g. No. of Ownerships	1	2	1	
203. Fort Dodge, Iowa				Northwest
a. Call Letters				KQTV
b. Channel No.				21
c. Network Affiliation(s)				N
d. No. of TV Homes#				52
e. Net Weekly Circulation#				34
f. Average Daily Circulation#				23
g. No. of Ownerships				1
204. Lufkin, Texas	Buford-Pengra			
a. Call Letters	KTRE			
b. Channel No.	9			
c. Network Affiliation(s)	A/C/N			
d. No. of TV Homes#	71			
e. Net Weekly Circulation#	33			
f. Average Daily Circulation#	25			
g. No. of Ownerships	2			
205. Fort Myers, Fla.				Ft. Myers Bcstg.
a. Call Letters				WINK
b. Channel No.				11
c. Network Affiliation(s)				C
d. No. of TV Homes#				46
e. Net Weekly Circulation#				33
f. Average Daily Circulation#				25
g. No. of Ownerships				1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956		SINGLE-OWNER STATIONS: 1956
201. Ensign, Kansas			
a. Call Letters			
b. Channel No.			
c. Network Affiliation(s)			
d. No. of Sets#			
g. No. of Ownerships			
202. Grand Junction/Montrose, Colo.	Rex Howell*	Rex Howell+	
a. Call Letters	KREX	KFXJ	
b. Channel No.	5	10	
c. Network Affiliation(s)	A/C/N	A/C/N	
d. No. of Sets#	18*	+	
g. No. of Ownerships	1	1	
203. Fort Dodge, Iowa			Northwest
a. Call Letters			KQTV
b. Channel No.			21
c. Network Affiliation(s)			N
d. No. of Sets#			47
g. No. of Ownerships			1
204. Lufkin, Texas	Clay		
a. Call Letters	KTRE		
b. Channel No.	9		
c. Network Affiliation(s)	Ind.		
d. No. of Sets#	55		
g. No. of Ownerships	1		
205. Fort Myers, Fla.			Ft. Myers Bcstg.
a. Call Letters			WINK
b. Channel No.			11
c. Network Affiliation(s)			A/C
d. No. of Sets#			40
g. No. of Ownerships			1

In thousands.
* Parent station; includes circulation data for satellite.
\+ Satellite station; circulation data included with parent station.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
206. Missoula, Mont.		KMSO
a. Call Letters		KGVO
b. Channel No.		13
c. Network Affiliation(s)		A/C/N
d. No. of TV Homes#		55
e. Net Weekly Circulation#		32
f. Average Daily Circulation#		22
g. No. of Ownerships		2
207. Twin Falls, Idaho	Glasmann	
a. Call Letters	KMVT	
b. Channel No.	11	
c. Network Affiliation(s)	A/C/N	
d. No. of TV Homes#	35	
e. Net Weekly Circulation#	30	
f. Average Daily Circulation#	25	
g. No. of Ownerships	2	
208. San Angelo, Texas	Harte-Hanks	
a. Call Letters	KCTV	
b. Channel No.	8	
c. Network Affiliation(s)	A/C	
d. No. of TV Homes#	36	
e. Net Weekly Circulation#	28	
f. Average Daily Circulation#	24	
g. No. of Ownerships	3	
209. Zanesville, Ohio	Zanesville Publ.	
a. Call Letters	WHIZ	
b. Channel No.	18	
c. Network Affiliation(s)	A/N	
d. No. of TV Homes#	56	
e. Net Weekly Circulation#	27	
f. Average Daily Circulation#	19	
g. No. of Ownerships	1	
210. Presque Isle, Maine	Community	
a. Call Letters	WAGM	
b. Channel No.	8	
c. Network Affiliation(s)	A/C	
d. No. of TV Homes#	26	
e. Net Weekly Circulation#	25	
f. Average Daily Circulation#	22	
g. No. of Ownerships	2	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
206. Missoula, Mont.		Mosby's
a. Call Letters		KMSO
b. Channel No.		13
c. Network Affiliation(s)		A/C
d. No. of Sets#		30
g. No. of Ownerships		1
207. Twin Falls, Idaho	Glasmann	
a. Call Letters	KLIX	
b. Channel No.	11	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	20	
g. No. of Ownerships	2	
208. San Angelo, Texas		Westex
a. Call Letters		KTXL
b. Channel No.		8
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		45
g. No. of Ownerships		1
209. Zanesville, Ohio	Zanesville Publ.	
a. Call Letters	WHIZ	
b. Channel No.	18	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	50	
g. No. of Ownerships	1	
210. Presque Isle, Maine		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966	
211. Mitchell, S. D.		Mitchell Bcstg.	
a. Call Letters		KORN	
b. Channel No.		5	
c. Network Affiliation(s)		N	
d. No. of TV Homes#		47	
e. Net Weekly Circulation#		25	
f. Average Daily Circulation#		16	
g. No. of Ownerships		1	
212. Yuma, Ariz./El Centro, Calif.		Bruce Merrill	Desert Tlcstg.
a. Call Letters		KIVA	KBLU
b. Channel No.		11	13
c. Network Affiliation(s)		A/N	C
d. No. of TV Homes#		33	15
e. Net Weekly Circulation#		24	13
f. Average Daily Circulation#		18	10
g. No. of Ownerships		4	1
213. Parkersburg, W. Va.	Zanesville Publ.		
a. Call Letters	WTAP		
b. Channel No.	15		
c. Network Affiliation(s)	A/N		
d. No. of TV Homes#	44		
e. Net Weekly Circulation#	24		
f. Average Daily Circulation#	13		
g. No. of Ownerships	2		
214. Florence, Ala.		TV Muscle Shoals	
a. Call Letters		WOWL	
b. Channel No.		15	
c. Network Affiliation(s)		N	
d. No. of TV Homes#		39	
e. Net Weekly Circulation#		24	
f. Average Daily Circulation#		17	
g. No. of Ownerships#		1	
215. North Platte, Nebr.		North Platte	
a. Call Letters		KNOP	
b. Channel No.		2	
c. Network Affiliation(s)		N	
d. No. of TV Homes#		31	
e. Net Weekly Circulation#		21	
f. Average Daily Circulation#		17	
g. No. of Ownerships		1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
211. Mitchell, S. D.		
a. Call letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
212. Yuma, Ariz./El Centro, Calif.		Valley Tlcstg.
a. Call Letters		KIVA
b. Channel No.		11
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		28
g. No. of Ownerships		1
213. Parkersburg, W. Va.	Zanesville Publ.	
a. Call Letters	WTAP	
b. Channel No.	15	
c. Network Affiliation(s)	A/C/N	
d. No. of Sets#	41	
g. No. of Ownerships	2	
214. Florence, Ala.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
215. North Platte, Nebr.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
216. Lafayette, Ind.	Sarkes Tarzian	
a. Call Letters	WFAM	
b. Channel No.	18	
c. Network Affiliation(s)	C	
d. No. of TV Homes#	74	
e. Net Weekly Circulation#	21	
f. Average Daily Circulation#	11	
g. No. of Ownerships	3	
217. Klamath Falls, Oregon	Redwood	
a. Call Letters	KOTI	
b. Channel No.	2	
c. Network Affiliation(s)	A/C	
d. No. of TV Homes#	29	
e. Net Weekly Circulation#	21	
f. Average Daily Circulation#	17	
g. No. of Ownerships	2	
218. Dickinson, N. D.		Dickinson Radio
a. Call Letters		KDIX
b. Channel No.		2
c. Network Affiliation(s)		A/C
d. No. of TV Homes#		32
e. Net Weekly Circulation#		20
f. Average Daily Circulation#		16
g. No. of Ownerships		1
219. Roseburg, Oregon	Eugene/ Redwood	
a. Call Letters	KPIC	
b. Channel No.	4	
c. Network Affiliation(s)	N	
d. No. of TV Homes#	36	
e. Net Weekly Circulation#	20	
f. Average Daily Circulation#	17	
g. No. of Ownerships	1/1**	
220. Coos Bay, Oregon	Eugene	
a. Call Letters	KCBY	
b. Channel No.	11	
c. Network Affiliation(s)	N	
d. No. of TV Homes#	39	
e. Net Weekly Circulation#	19	
f. Average Daily Circulation#	15	
g. No. of Ownerships	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
216. Lafayette, Ind.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
217. Klamath Falls, Oregon	Redwood	
a. Call Letters	KOTI	
b. Channel No.	2	
c. Network Affiliation(s)	C	
d. No. of Sets#	10	
g. No. of Ownerships	2	
218. Dickinson, N. D.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
219. Eugene, Oregon	Eugene/ Redwood	
a. Call Letters	KPIC	
b. Channel No.	4	
c. Network Affiliation(s)	N	
d. No. of Sets#	12	
g. No. of Ownerships	1/1**	
220. Coos Bay, Oregon		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		

In thousands.
** This represents the number of ownerships for the interests held by each of the present majority owners.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
221. Big Spring, Texas	Grayson	
a. Call Letters	KWAB	
b. Channel No.	4	
c. Network Affiliation(s)	A/C	
d. No. of TV Homes#	26	
e. Net Weekly Circulation#	19	
f. Average Daily Circulation#	15	
g. No. of Ownerships	3	
222. Pembina, N. D.	Polaris	
a. Call Letters	KCND	
b. Channel No.	12	
c. Network Affiliation(s)	A	
d. No. of TV Homes#	27	
e. Net Weekly Circulation#	18	
f. Average Daily Circulation#	14	
g. No. of Ownerships	2	
223. Marion, Ind.		Geneco Bcstg.
a. Call Letters		WTAF
b. Channel No.		31
c. Network Affiliation(s)		Ind.
d. No. of TV Homes#		55
e. Net Weekly Circulation#		17
f. Average Daily Circulation#		9
g. No. of Ownerships		2
224. Muncie, Ind.		Tri-City Radio
a. Call Letters		WLBC
b. Channel No.		49
c. Network Affiliation(s)		A/N
d. No. of TV Homes#		53
e. Net Weekly Circulation#		16
f. Average Daily Circulation#		6
g. No. of Ownerships		1
225. Laredo, Texas	Donald W. Reynolds	
a. Call Letters	KGNS	
b. Channel No.	8	
c. Network Affiliation(s)	A/C/N	
d. No. of TV Homes#	15	
e. Net Weekly Circulation#	14	
f. Average Daily Circulation#	13	
g. No. of Ownerships	2	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
221. Big Spring, Texas		Big Spring
a. Call Letters		KBST
b. Channel No.		4
c. Network Affiliation(s)		C
d. No. of Sets#		63
g. No. of Ownerships		1
222. Pembina, N. D.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
223. Marion, Ind.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
224. Muncie, Ind.		Tri-City Radio
a. Call Letters		WLBC
b. Channel No.		49
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		106
g. No. of Ownerships		1
225. Laredo, Texas		Vidicon Industries
a. Call Letters		KHAD
b. Channel No.		8
c. Network Affiliation(s)		A/C/N
d. No. of Sets#		15
g. No. of Ownerships		1

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966	SINGLE-OWNER STATIONS: 1966
226. Riverton, Wyoming		Chief Washakie
a. Call Letters		KWRB
b. Channel No.		10
c. Network Affiliation(s)		A/C
d. No. of TV Homes#		15
e. Net Weekly Circulation#		13
f. Average Daily Circulation#		9
g. No. of Ownerships		1
227. Selma, Ala.		Selma
a. Call Letters		WSLA
b. Channel No.		8
c. Network Affiliation(s)		A
d. No. of TV Homes#		16
e. Net Weekly Circulation#		11
f. Average Daily Circulation#		4
g. No. of Ownerships		1
228. Carlsbad, New Mexico		Voice of the Caverns
a. Call Letters		KAVE
b. Channel No.		6
c. Network Affiliation(s)		C
d. No. of TV Homes#		14
e. Net Weekly Circulation#		10
f. Average Daily Circulation#		6
g. No. of Ownerships		4
229. Helena, Mont.		Capital City
a Call Letters		KBLL
b. Channel No.		12
c. Network Affiliation(s)		A/C/N
d. No. of TV Homes#		9
e. Net Weekly Circulation#		8
f. Average Daily Circulation#		7
g. No. of Ownerships		3
230. Glendive, Mont.		Glendive Bcstg.
a. Call Letters		KXGN
b. Channel No.		5
c. Network Affiliation(s)		C
d. No. of TV Homes#		7
e. Net Weekly Circulation#		6
f. Average Daily Circulation#		5
g. No. of Ownerships		1

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956	SINGLE-OWNER STATIONS: 1956
226. Riverton, Wyoming		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
227. Selma, Ala.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
228. Carlsbad, New Mexico		Voice of the Caverns
a. Call Letters		KAVE
b. Channel No.		6
c. Network Affiliation(s)		C
d. No. of Sets#		30
g. No. of Ownerships		1
229. Helena, Mont.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		
230. Glendive, Mont.		
a. Call Letters		
b. Channel No.		
c. Network Affiliation(s)		
d. No. of Sets#		
g. No. of Ownerships		

In thousands.

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1966					SINGLE-OWNER STATIONS: 1966
Alaska	Midnight Sun	Midnight Sun	Midnight Sun	Northern	Northern	
a. Call Letters	KENI	KFAR	KINY	KTVA	KTVF	
b. Channel No.	2	2	8	11	11	
c. Network Affiliation(s)	A/N	A/N	A/C/N	C	C	
d. No. of TV Homes#	-	-	-	-	-	
e. Net Weekly Circulation#	-	-	-	-	-	
f. Average Daily Circulation#	-	-	-	-	-	
g. No. of Ownerships	2	1	2	1	1	

1965 MARKET RANK AND ITEMS	GROUP-OWNED STATIONS: 1956					SINGLE-OWNER STATIONS: 1956
Alaska	Midnight Sun	Midnight Sun	Northern	Northern	Northern	
a. Call Letters	KENI	KFAR	KINY	KTVA	KTVF	
b. Channel No.	2	2	8	11	11	
c. Network Affiliation(s)	A/N	A/N	C	C	C	
d. No. of Sets#	-	-	-	-	-	
g. No. of Ownerships	2	1	1	1	1	

Note: The information in the Factbook (indicated below) was updated by means of the weekly Television Digest reports through June 23, 1966. Thus, type-of-owner classifications are as of the end of June 1966; the viewing data are as of March 1965; and the network affiliations have been corrected in some cases, but are essentially as of January 1, 1966.

In thousands.

Sources: Television Digest, Inc., Television Factbook, Nos. 24 and 36; Standard Rate and Data Service, Inc., Spot Television Rates and Data.

Appendix C

SPECIAL ANALYSIS OF TV STATION SALES PRICES: TECHNICAL NOTES

Television station sales prices are among the least accessible economic data, since the FCC has rarely released series compiled on a comparable basis. One series did appear in *Economic Study of Standard Broadcasting,* where inflated capital values — as reflected in sales prices — were cited in warning of the dangers of: (a) an overexpanded postwar market in AM radio; and (b) adverse pressures on program balance and diversity. An earlier and better known example is the series of AM radio station prices the Commission transmitted annually to Congressman Wigglesworth for inclusion in House documents during the 1930's. While these data reflected the interest during those years in the magnitude of the franchise value exacted by licensees at time of sale, there was no attempt to interpret the sales price data reported.

Despite the difficulties involved, as full a series of TV station sales prices as possible was prepared covering the period 1949-1965, in order to enable us to determine the relative contributions of several possible explanatory factors, including — but not limited to — type of ownership.

All major station sales for which information was published in *Television Factbook* (No. 35) for the period 1949-1965 were examined. For purposes of comparability, it was necessary to eliminate all sales which involved more than one TV station plus one radio station. For the remaining transactions, the following data were secured from published sources: (a) number of TV homes (or TV sets) in the market; (b) number of months held by the respective owners; (c) network affiliation (if any); (d) type of ownership (group or nongroup) of seller and buyer at the time of sale. The sales transactions for which it was not possible to secure complete data were also omitted from the analysis, due to the stringent demands of the statistical procedures involved in the regression analyses to be performed.

Sales were grouped as follows:

VHF A = Sales of VHF stations: a 100% ownership transfer; all cash and noncash elements (e.g., assumption of liabilities) combined to secure a total price.

VHF B = Sales of VHF stations: a less than 100% interest (but more than 50%) transferred; a price (including all cash and non-cash elements) was calculated to reflect a 100% ownership transfer price.

VHF C = Sales of VHF stations: an AM and/or FM station included in the sale and only a combined price for the package was available, but the TV portion of the package was presumed to account for the bulk of the combined price.

In addition to sales price, a second dependent variable was studied: namely, the number of months a station was held before being sold.

The independent variables used in the regression analyses, selected on the basis of availability as well as industry concepts, are described below.

TV Homes and Net Weekly Circulation: Number of TV homes in the market (or the number of TV sets for the earlier years) provides an index of total potential audience and is of importance to advertisers. Although net weekly circulation or average daily circulation figures are a better measure of the actual (as opposed to potential) audience, the nonavailability of these data for the earlier dates would have reduced the size of the sample substantially. Therefore, the emphasis was placed on TV homes as the major measure of size. However, regression analyses using net weekly circulation in place of TV homes were run, and the results are presented in Appendix Exhibits C-7, C-8 and C-9.[1]

Age of Station: This variable was selected on the assumption that older stations are more likely to have choice advertising and network affiliations, and to have established a distinctive "image" and otherwise built up a loyal audience.

Network Affiliation: It was assumed that the strength of a network, or its economic value to the affiliate, should be scaled as follows: major network (primary tie with CBS or NBC) = 4; major/minor (primary tie with a

[1]Note that there were insufficient data to present an exhibit for Type B sales based on net weekly circulation figures.

major network and ABC or Dumont) = 3; minor (primary tie with ABC or Dumont) = 2; independent (nonaffiliated) = 1. The scales selected were reflective — in our opinion — of the relative economic value of the network tie throughout much of the period covered. More recently, however, the competitive positions of the networks appear to have become more nearly equalized, and independents are showing strength in many markets.

Type of Channel: Because UHF stations were sold under duress during most of the period and had little, if any, economic value in most markets until recently, it seemed prudent to run tests for VHF sales only.

Type of Ownership: Group-owned and single-owner stations were differentiated, scaling them as 2 and 1, respectively. Further distinctions were then made between: (a) single-owner sales to group owners; (b) single-owner sales to other single owners; (c) group-owner sales to other group owners; and (d) group-owner sales to a single owner. These appeared to be the most pertinent distinctions best able to test the hypothesis that type of ownership had a significant influence on sales prices.

With the above factors to explain variations in TV station sales prices, the main task was to see whether groupness figured significantly when full account was taken of the other factors.

Were other crucial factors omitted which might have an important influence on the value of TV stations? For example, FCC-imposed constraints (power, antenna heights, number of stations in the market) and industry ingenuity (as reflected in program popularity, original cost of assets) both undoubtedly affect competitive position, income-earning capabilities and sales prices. Aside from limitations imposed by the unavailability of detailed data for many of these measures, however, the main task was not to develop a full explanation for the level of TV station sales prices but rather to determine the relative importance — if any — of groupness in explaining these prices. And, for this, only the more relevant control factors need be included.

The computer program used to generate the regression statistics has several features which are designed to facilitate model building. One allows the user to build the model by adding successive terms to the prediction equation with complete statistics presented at each step. Thus, the user may first examine the equation, $y = a + b_1x_1$; then $y = a + b_1x_1 + b_2x_2$; etc. For each of the variables not yet entered into the equation, the program computes the partial correlation with the dependent variable, partialling out those variables already in the equation. Thus, the program computes and reports the contribution to R^2 produced by entering the respective variables into the equation at each step. For each of the variables in the equation, the program computes a similar partial correlation, partialling out all the other variables in the equation and reports this and the reduction to R^2 which accompanies the elimination of that variable from the equation as the next step. Because the program allows variables to be added or deleted from the equation in progress, the user has an opportunity to examine all possible alternative solutions.

The user may specify the order that the variables are to appear in the equation or he may let the computer choose the order. If the computer does the ordering, variables are entered in the order of the largest contribution to R^2 at each of the successive steps. Thus, the user may note the relative importance of the predictor variables. This mode of analysis yields the best prediction equation if the number of variables allowed to enter is small in comparison to the total number possible.

A summary of the step-by-step computer-process regression analyses is presented in Appendix Exhibits C-1 through C-9 in the following format.

$R^2 = 0.4212$ Constant $= -1032.3283$

Variables	Regression Coefficients	Standardized Regression Coefficients
TV Homes	3.7098	0.5604

(a) R^2 represents the portion of the sales price variations explained by the variables included in the analysis.

(b) The constant represents the *a* value in the equation $y = a + b_1x_1 + b_2x_2 \ldots.$

(c) Although the regression coefficients represent the b values in the equation, it is the *standardized* regression coefficients which describe the *relative* importance of the independent variables. It should be noted particularly that, in each instance, the independent variables are listed in the descending order of the value of the standardized regression coefficients.

Appendix Exhibit C-1

SALES PRICE REGRESSION ANALYSES: ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample--Average Sales Price = $2,710,500		
R^2 = 0.4212	Constant = -1,032.3283	
No. of TV Homes	3.7098	0.5604
Age of Station	12.5956	0.1595
Network Affiliation	442.6682	0.1443
Type of Seller	320.7540	0.0484
Single-Owner Station Sales--Average Sales Price = $2,261,500		
R^2 = 0.3888	Constant = -1, 590.5871	
No. of TV Homes	2.8736	0.4749
Age of Station	16.8411	0.2410
Network Affiliation	331.7009	0.1307
Type of Buyer	696.9801	0.1126
Group-Owned Station Sales--Average Sales Price = $3,295,500		
R^2 = 0.4453	Constant = -1,231.1710	
No. of TV Homes	4.4579	0.6378
Network Affiliation	536.8320	0.1499
Age of Station	5.6844	0.0616
Type of Buyer	429.3617	0.0414

Appendix Exhibit C-2

SALES PRICE REGRESSION ANALYSES: TOP 50 MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample--Average Sales Price = $4,879,500		
R^2 = 0.3435	Constant = -1,705.7604	
No. of TV Homes	3.0731	0.4913
Network Affiliation	1,080.0636	0.2918
Type of Seller	995.5662	0.1146
Age of Station	4.6273	0.0492
Single-Owner Station Sales--Average Sales Price = $4,073,000		
R^2 = 0.4221	Constant = -4,288.2704	
No. of TV Homes	1.6000	0.2947
Age of Station	26.3649	0.2889
Type of Buyer	2,328.0561	0.2785
Network Affiliation	762.3855	0.2486
Group-Owned Station Sales--Average Sales Price = $5,793,000		
R^2 = 0.3513	Constant = -3,989.4663	
No. of TV Homes	3.7160	0.5436
Network Affiliation	1,066.2965	0.2571
Type of Buyer	2,426.5002	0.1478
Age of Station	-5.7590	-0.0572

Appendix Exhibit C-3

SALES PRICE REGRESSION ANALYSES: TOP 100 MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample--Average Sales Price = $3,833,500		
R^2 = 0.3669	Constant = -662.1933	
No. of TV Homes	2.9949	0.4691
Age of Station	16.3104	0.1936
Network Affiliation	521.5431	0.1643
Type of Seller	303.8216	0.0400
Single-Owner Stations Sales--Average Sales Price = $3,275,500		
R^2 = 0.3826	Constant = -2,473.8951	
No. of TV Homes	1.8772	0.3311
Age of Station	25.0944	0.3149
Type of Buyer	1,321.5787	0.1702
Network Affiliation	443.8099	0.1655
Group-Owned Station Sales--Average Sales Price = $4,033,500		
R^2 = 0.3848	Constant = -814.0717	
No. of TV Homes	3.9110	0.5710
Network Affiliation	490.9818	0.1356
Age of Station	7.7483	0.0856
Type of Buyer	528.8563	0.0463

Appendix Exhibit C-4

SALES PRICE REGRESSION ANALYSES--TYPE A: ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample Type A Sales--Average Sales Price = $2,710,000		
R^2 = 0.5820	Constant = -870.0957	
No. of TV Homes	3.3282	0.6571
Age of Station	11.2077	0.1643
Type of Seller	768.4656	0.1305
Network Affiliation	155.8537	0.0608
Single-Owner Station Type A Sales--Average Sales Price = $2,152,000		
R^2 = 0.5616	Constant = -2,442.5287	
No. of TV Homes	3.1856	0.6460
Type of Buyer	1,310.5410	0.2101
Age of Station	9.5567	0.1346
Network Affiliation	227.0429	0.1034
Group-Owned Station Type A Sales--Average Sales Price = $3,525,500		
R^2 = 0.6123	Constant = -199.8112	
No. of TV Homes	3.2346	0.6543
Age of Station	12.4846	0.1736
Type of Buyer	646.3812	0.0769
Network Affiliation	-12.2606	-0.0040

Appendix Exhibit C-5

SALES PRICE REGRESSION ANALYSES--TYPE B: ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample Type B Sales--Average Sales Price = $2,662,000		
R^2 = 0.3465	Constant = -4,152.6489	
No. of TV Homes	3.0886	0.5017
Network Affiliation	1,010.1273	0.2798
Type of Seller	1,681.2164	0.2294
Age of Station	9.6155	0.0912
Single-Owner Station Type B Sales--Average Sales Price = $1,715,500		
R^2 = 0.3996	Constant = -306.8153	
No. of TV Homes	1.9421	0.5372
Network Affiliation	1,105.4222	0.4885
Type of Buyer	-1,337.8331	-0.2992
Age of Station	12.0230	0.1776
Group-Owned Station Type B Sales--Average Sales Price = $3,694,000		

INSUFFICIENT SAMPLE

Appendix Exhibit C-6

SALES PRICE REGRESSION ANALYSES--TYPE C: ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample Type C Sales--Average Sales Price = $2,736,500		
R^2 = 0.4919	Constant = -250.3017	
No. of TV Homes	5.6094	0.5874
Age of Station	16.2302	0.2090
Type of Seller	-476.0788	-0.0706
Network Affiliation	185.7948	0.0543
Single-Owner Station Type C Sales--Average Sales Price = $2,606,500		
R^2 = 0.6130	Constant = -2,825.0692	
No. of TV Homes	8.5540	0.6617
Age of Station	14.2764	0.2045
Type of Buyer	1,188.4175	0.1679
Network Affiliation	122.1988	0.0409
Group-Owned Station Type C Sales--Average Sales Price = $2,907,500		
R^2 = 0.4729	Constant = -1,251.9591	
No. of TV Homes	4.6597	0.5666
Age of Station	12.1592	0.1315
Network Affiliation	512.1253	0.1131
Type of Buyer	30.9663	0.0032

Appendix Exhibit C-7

SALES PRICE REGRESSION ANALYSES:[a] ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample--Average Sales Price = $3,526,000		
R^2 = 0.4553	Constant = 339.9202	
Net Weekly Circulation	7.5414	0.7245
Network Affiliation	426.1396	0.1240
Age of Station	-2.3875	-0.0246
Type of Seller	119.1463	0.0163
Single-Owner Station Sales--Average Sales Price = $3,284,500		
R^2 = 0.4846	Constant = -957.6210	
Net Weekly Circulation	7.8175	0.7053
Network Affiliation	443.0793	0.1375
Type of Buyer	757.6623	0.1039
Age of Station	-2.4259	-0.0290
Group-Owned Station Sales--Average Sales Price = $3,710,000		
R^2 = 0.4442	Constant = 1,105.1572	
Net Weekly Circulation	7.2627	0.7187
Network Affiliation	337.5802	0.0944
Age of Station	-3.1787	-0.0294
Type of Buyer	-63.4523	-0.0055

[a] Net weekly circulation used as independent variable in place of number of TV homes.

Appendix Exhibit C-8

SALES PRICE REGRESSION ANALYSES[a/]--TYPE A: ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample Type A Sales--Average Sales Price = $3,316,500		
R^2 = 0.6864	Constant = -289.5460	
Net Weekly Circulation	5.0483	0.7389
Age of Station	9.4040	0.1256
Type of Seller	421.3093	0.0645
Network Affiliation	-32.9666	-0.0120
Single-Owner Station Type A Sales--Average Sales Price = $2,877,000		
R^2 = 0.8183	Constant = -1,127.5610	
Net Weekly Circulation	6.6795	0.8890
Type of Buyer	900.4220	0.1021
Network Affiliation	118.4421	0.0428
Age of Station	0.4526	0.0057
Group-Owned Station Type A Sales--Average Sales Price = $3,646,500		
R^2 = 0.6182	Constant = -1,608.1890	
Net Weekly Circulation	3.0949	0.4990
Age of Station	26.3848	0.3563
Type of Buyer	950.3487	0.1151
Network Affiliation	-52.2774	-0.0189

a/ Net weekly circulation used as independent variable in place of number of TV homes.

Appendix Exhibit C-9

SALES PRICE REGRESSION ANALYSES[a]--TYPE C: ALL MARKETS

Variables	Regression Coefficients	Standardized Regression Coefficients
Total Sample Type C Sales--Average Sales Price = $3,553,000		
R^2 = 0.8006	Constant = -1,271.0222	
Net Weekly Circulation	21.9427	0.9065
Age of Station	10.5541	0.0879
Network Affiliation	-272.1245	-0.0654
Type of Seller	431.3476	0.0618
Single-Owner Station Type C Sales--Average Sales Price = $4,598,000		
R^2 = 0.7581	Constant = -3,830.5879	
Net Weekly Circulation	22.4175	0.8676
Type of Buyer	1,808.5945	0.1582
Network Affiliation	-331.0094	-0.0772
Age of Station	7.2469	0.0550
Group-Owned Station Type C Sales--Average Sales Price = $2,624,000		
R^2 = 0.8723	Constant = -334.4755	
Net Weekly Circulation	19.4919	0.8217
Age of Station	18.9708	0.1920
Network Affiliation	-169.7224	-0.0449
Type of Buyer	-473.1915	-0.0375

a/ Net weekly circulation used as independent variable in place of number of TV homes.

Appendix D

FIELD SURVEY COMPARING ROLE OF GROUP-OWNED AND SINGLE-OWNER STATIONS IN THE NEWS, PUBLIC AFFAIRS AND EDITORIAL AREAS

INTERVIEW GUIDE

Station and Group Policies and Objectives

1. What are the basic policies and objectives of the station as to image, type of audience, share of market, types of programs, profit objectives, capital investment, etc.?
2. To what extent are these originated by the station manager? By group headquarters for group-owned stations? By Board of Directors for single-owner stations?
3. Are the station's policies in writing?
4. On such policy questions as change in type of audience sought, what would be the process of change involved? Unilateral decision by station manager subject only to budget limits? Advice from group? Suggested by group? Controlled by group?
5. Changes in budget or profit objectives or capital expenditure. What influence does station manager have? Who has final say? Get specific examples, especially capital budget decisions having relatively long pay-back.

Management Structure and Personnel

1. Frequency, channels and substance of contacts with group headquarters during past month.
2. How often are visits made to stations by group headquarters personnel?

Programming and Program Sources

1. Is the station manager trying to program for a particular audience, or create a particular image for the station? If so, what is it? Who originated the policy? When? By what means does station manager measure station's success in creating desired image or attracting desired audience?
2. *Group-Owned Stations:* In the preceding 30 days, what advice, suggestions or directives have been issued by group headquarters with respect to programs (e.g., take, not take, changes)? What was nature of group headquarters communication?
3. *Single-Owner Stations:* Is the station at a competitive disadvantage in terms of audience because a group-owned competitor can get programs through its group headquarters which are unavailable to this station? Give examples.
4. *Group-Owned Stations:* Does station have competitive advantage in attracting audience by virtue of programs provided by group headquarters?
5. *Nonaffiliates Only*
   a. *Single-Owner Stations:* How and to what extent are you under a competitive disadvantage because of nonaffiliation with a network or a group?
   b. *Group-Owned Stations:* How and to what extent are you under a competitive disadvantage because of nonaffiliation? Does the fact that you are group-owned give you any advantage over a nongroup-owned station?

News

1. *Station Managers Only:* In the last 30 days, how many conversations have you held with the program director or news director relative to news programs? What were the subjects of conversation? How many suggestions were made as to items to be included or excluded, slant or angle to be taken?
2. *News Directors Only:* Same question on conversations with the station manager, sales manager and program director.
3. What are the outside pressures to include or exclude news items? How are they handled?
   a. Local
   b. State or Federal
   c. Business and Advertisers
   d. Network
   e. Other

Cultural and Other Special Interest Programs

1. What are the processes and channels for deciding to handle, or not to handle, cultural or other special interest programs? Who has the final say? To what extent are there local pressures for more cultural and other special interest programs? How are they handled? Get specifics.
2. If there is *no* ETV station in market, does the station manager think that the presence of one would have any effect on the cultural and other special interest programs which he carries?
3. *Single-Owner Stations:* To what extent do directors have an interest in particular types of cultural or special interest programs? Do they urge more programs of this type on the station manager? Does he accept or refuse?

Sales Activities

1. *Single-Owner Stations:* Because this is a singly-owned station, do you have any sales advantages over a group-owned competitor? Any disadvantages? Specify types of sales.
2. *Group-Owned Stations:* What types of sales help do you receive from group headquarters? How often?
3. *Group Headquarters:* What kind of sales help is offered to the stations? How often? Who conducts negotiations with agents and/or with network?

Pricing and Rates

1. To what extent can the card rates be obtained without shading? Without special deals or favors? Was the same thing true of the rates in effect two years ago? What kind of special deals are still provided? To what types of advertisers?
2. To what extent are major competitors able to obtain their card rates without shading or special deals? Was this true two years ago? Ask specifically about any single-station owner.
3. When a program has a lower-than-expected audience and hence a higher-than-expected CPM, what action is taken by the station? If the advertiser complains?
4. How often are rates reviewed? On what basis is a decision reached to increase rates? Is the station a price leader or a price follower relative to competitive stations? Which station, if any (characteristics), is the price leader in this market?
5. How and to what extent are price increases resisted by national spot and and local spot advertisers? Do spots drop? Shift?
6. *Single-Owner Stations:* Do your group-owned competitors appear to have any advantages (disadvantages) over you on a CPM basis for equivalent or similar time?

7. *Group-Owned Stations:* What help does group headquarters provide on pricing? Are there general price policies which must be followed? How much communication is there on prices? Are shadings and deals discouraged, encouraged, left to local management?

Budgets, Costs and Profit Standards

1. *Group-Owned Stations:* Is there a detailed operating budget for the station? Who prepares? Who approves? What inputs to the budget does group headquarters make? Detailed major headings? Profit result only?
2. What is the process for modifying the budget? Who gets involved in decisions to modify?
3. Have there been any recent incidents when the budget was exceeded by more than 10% due to higher costs, or profits reduced due to lower-than-expected revenues? What happened?
4. *Single-Owner Stations:* What constraints are imposed *by* Board of Directors? Similar question *to* Board, Finance or Executive Committee.

Salaries, Wages and Expenses

1. Are the salaries for station manager and key personnel on a par with, higher or lower than the salaries of other group or single-station competitors? Why?
2. Same question with respect to wages and fringe benefits of other employees.
3. *Single-Owner Stations:* Does the station manager believe that because he runs a single station he may have some salary, wage or fringe advantage over a group-owned competitor? Vice versa?
4. *Group-Owned Stations:* Does the station manager believe that because he runs a group station he has an advantage over single-owner stations in attracting competent staff? Vice versa? Why?
5. *Single-Owner Stations:* Does the station manager believe that because he runs a single station he is at a disadvantage in attracting competent staff? Vice versa? Why?

FIELD INTERVIEW SUMMARY

A. Number of stations interviewed: 35

B. Distribution of stations:

1. Market Rank:	No. of Stations
1- 10	9
11- 20	10
21- 30	5
31- 40	5
41- 50	3
51-100	3
Total	35

2. Form of Ownership:	No. of Stations
Group-Owned	25
Single-Owner	8
Network	2
Total	35

3. Network Affiliation:	No. of Stations
Affiliates	28
Independents	7
Total	35

4. UHF vs. VHF:	No. of Stations
VHF	33
UHF	2
Total	35

UNITED RESEARCH
INCORPORATED
1730 CAMBRIDGE ST., CAMBRIDGE, MASSACHUSETTS 02138 / TELEPHONE (AC 617) 868-7010

Dear Sir:

Our organization is conducting a comprehensive research study on behalf of the Council for Television Development to examine the implications of the proposed FCC rule limiting ownership in major markets. We are using questionnaire and interviewing techniques and examining sources such as previous studies, FCC reports and other public and private documents.

The enclosed questionnaire requests information which can be obtained only from those with direct knowledge and experience in television broadcasting. We must have your cooperation if we are to develop an accurate and realistic picture of the relationships between form of ownership and the dynamics of the industry. We assure you that all material which you provide will be treated as confidential and used only in combination with other responses to determine industry patterns. Where precise data are not available, we would appreciate your best estimate.

Please complete the enclosed questionnaire and return it within one week. Thank you for your cooperation.

Sincerely yours,

Leon V. Hirsch

Leon V. Hirsch
Vice-President

SURVEY OF TELEVISION INDUSTRY OPERATIONS a/

A. GENERAL INFORMATION

1. Please report the number of employees by department as of December 31, 1965.

Department	No. of Employees
Administration	....
Sales	....
News	....
Programming	....
Engineering	....
Other (please specify)	....
....	....
Total No. of Employees	....

2. With which unions, if any, does your station have collective bargaining agreements? If none, please check here. ....

Name of Union	No. of Employees Covered	Type of Employees
....	....	....
....	....	....
....	....	....
....	....	....
....	....	....

3. Give the following information for managers and department heads.

	Number of Years			Number of Organization Affiliations		
	In Community	At Station	In Broadcasting	Community	Professional	Social
Station Manager	....	....	....	....	....	....
Sales Manager	....	....	....	....	....	....
Program Director	....	....	....	....	....	....
News Director	....	....	....	....	....	....
Public Affairs Director	....	....	....	....	....	....
Chief Engineer	....	....	....	....	....	....
Controller	....	....	....	....	....	....
Other (please specify)	....	....	....	....	....	....
....	....	....	....	....	....	....

4. Please submit an organization chart of your station.

B. NATURE AND SOURCES OF PROGRAMS

5. Report distribution of broadcast time by sources of programs for 1965.

Source	% of Total Time
Network	....
Produced by:	
Groups	....
Station	....
Acquired by station from:	
Other Stations	....
Independent Producers	....
Other (please specify)	....
....	....
	100%

a/ sent to single-owner stations

6. Please report total hours of nonnetwork programming and nonnetwork news programming (i.e., regular daily news broadcasts) for 1960 and 1965.

	No. of Hours			
	Total Nonnetwork*		Nonnetwork News Only	
	1960**	1965	1960**	1965
a. Sign-on (at .... A.M.) to 7:00 P.M.	....	....	....	....
b. 7:00 P.M. to 11:00 P.M.	....	....	....	....
c. 11:00 P.M. to sign-off (at .... P.M./A.M.)	....	....	....	....
Total No. of Hours	....	....	....	....

*Including news.

**If 1960 figures are not available, please report data for year closest to 1960, and indicate the year for which information is given. ....

7. Estimate the percentage of total broadcast time devoted to news broadcasts (i.e., news reports and commentaries). ....%

8. Indicate the amount of news broadcast time devoted to coverage of local events. ....%

9. Give the percentage of total broadcast time devoted to public affairs programming (i.e., panel interviews, civic events coverage, issue discussions, documentaries — but excluding news). ....%

10. Indicate the degree of dependence upon each of the following as news sources (i.e., news reports and commentaries).

	Very Great	Great	Moderate	Little	Very Little	None
National Wire Services	....	....	....	....	....	....
Local News Service or Bureau	....	....	....	....	....	....
Station Reportorial Staff	....	....	....	....	....	....
Staff of Affiliated Newspaper	....	....	....	....	....	....
Group's News Organization	....	....	....	....	....	....
Network News Organization	....	....	....	....	....	....
Press Releases:	....	....	....	....	....	....
Local or State Government	....	....	....	....	....	....
National Government	....	....	....	....	....	....
Local Private Groups	....	....	....	....	....	....
National Private Groups	....	....	....	....	....	....
Other (please specify)	....	....	....	....	....	....
....	....	....	....	....	....	....

11. Does your station carry editorials? Yes........... No...........

If "yes," list the subject matter, length of time, and check the source of editorials which your station broadcast during the January — March 1966 period.

Subject	Time in minutes	No. of Times per Week	Source Headquarters	Local
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....

12. **Indicate the degree of influence each of the following exerts on the station's editorial position.**

	Very Great	Great	Moderate	Little	Very Little	None
Owner	....	....	....	....	....	....
Board of Directors	....	....	....	....	....	....
Station Manager	....	....	....	....	....	....
Program Director	....	....	....	....	....	....
News Director	....	....	....	....	....	....
Editorial Writer(s)	....	....	....	....	....	....
Local Interest Groups	....	....	....	....	....	....
Position Taken by Other Media	....	....	....	....	....	....
Other (please specify)	....	....	....	....	....	....
....	....	....	....	....	....	....

13. **Please indicate the methods and sources used in trying to determine the kinds of news and public affairs programming your community wants and how often you refer to these sources.**

....

....

C. FINANCIAL DATA

14. **Please indicate the cost and revenue of nonnetwork programs broadcast during the January — March 1966 period.**

Nonnetwork Programs	Total Hours of Broadcast Time	Total Cost*	Total Time Sales
Produced by:			
Groups	....	$........	$...............
Station	....	....	....
Acquired by Station from:			
Groups	....	....	....
Independent Producers	....	....	....
Other (please specify)			
....	....	....	....
....	....	....	....
Total	....	$........	$...............

**Purchase price, rental price, or production cost (net of commissions).*

15. **Indicate sales of programs produced by your station during the January — March 1966 period.**

Amount of Sales $......................

No. of Hours of Program ....

16. **Estimate the dollar value of the support your station has given to educational television. If details not available please report total amounts.**

	During 1965	Since Inception of ETV
Financial	$........	$........
Equipment	....	....
Technical Advice	....	....
Facility Use	....	....
Other (please specify)	....	....
....	....	....
Total	$........	$........

Name .... Title .... Station ....

Mail to:

United Research Incorporated
1730 Cambridge Street
Cambridge, Massachusetts 02138

SURVEY OF TELEVISION INDUSTRY OPERATIONS a/

A. GENERAL INFORMATION

1. Please report the number of employees by department as of December 31, 1965.

Department	No. of Employees
Administration	....
Sales	....
News	....
Programming	....
Engineering	....
Other (please specify)	....
....	....
Total No. of Employees	....

2. With which unions, if any, does your station have collective bargaining agreements? If none, please check here. ....

Name of Union	No. of Employees Covered	Type of Employees
....	....	....
....	....	....
....	....	....
....	....	....
....	....	....

3. Indicate who is responsible for setting labor policy.

a. Group Headquarters .... b. Station Management .... c. Both ....

4. Give the following information for managers and department heads.

	Number of Years			Number of Organization Affiliations		
	In Community	At Station	In Broadcasting	Community	Professional	Social
Station Manager	....	....	....	....	....	....
Sales Manager	....	....	....	....	....	....
Program Director	....	....	....	....	....	....
News Director	....	....	....	....	....	....
Public Affairs Director	....	....	....	....	....	....
Chief Engineer	....	....	....	....	....	....
Controller	....	....	....	....	....	....
Other (please specify)	....	....	....	....	....	....
....	....	....	....	....	....	....

5. Please submit an organization chart of your station.

B. NATURE AND SOURCES OF PROGRAMS

6. Report distribution of broadcast time by sources of programs for 1965.

Source	% of Total Time
Network	....
Produced by:	
Group Headquarters	....
Station	....
Acquired by station from:	
Group Headquarters	....
Independent Producers	....
Other (please specify)	....
....	....
	100%

a/ sent to group-owned stations

7. Please report total hours of nonnetwork programming and nonnetwork news programming (i.e., regular daily news broadcasts) for 1960 and 1965.

	No. of Hours			
	Total Nonnetwork*		Nonnetwork News Only	
	1960**	1965	1960**	1965
a. Sign-on (at .... A.M.) to 7:00 P.M.	......	......	......	......
b. 7:00 P.M. to 11:00 P.M.	......	......	......	......
c. 11:00 P.M. to sign-off (at .... P.M./A.M.)	......	......	......	......
Total No. of Hours	......	......	......	......

*Including news.

**If 1960 figures are not available, please report data for year closest to 1960, and indicate the year for which information is given. ....

8. Estimate the percentage of total broadcast time devoted to news broadcasts (i.e., news reports and commentaries). ....%

9. Indicate the amount of news broadcast time devoted to coverage of local events. ....%

10. Give the percentage of total broadcast time devoted to public affairs programming (i.e., panel interviews, civic events coverage, issue discussions, documentaries — but excluding news). ....%

11. For the period January-March 1966, list the nonnetwork programs broadcast on a regularly scheduled basis (i.e., at least once a week). Attach a separate sheet if necessary. If required by headquarters, please circle title.

Title	Sources (please check) Produced by: Group	Station	Acquired thru: Group	Station	Type of Program*	Length Program in minutes	No. of Times per Week	Rating
......	......	......	......	......	......	......	......	......
......	......	......	......	......	......	......	......	......
......	......	......	......	......	......	......	......	......
......	......	......	......	......	......	......	......	......
......	......	......	......	......	......	......	......	......
......	......	......	......	......	......	......	......	......

*i.e., entertainment, public affairs, sports, news, etc.

12. Have you turned down any programs offered by headquarters during the January-March 1966 period? Yes .... No .... If "yes," list them below. Attach a separate sheet if necessary.

Title	Type of Programs	Program Length in minutes	Reason
......	......	......	......
......	......	......	......
......	......	......	......
......	......	......	......
......	......	......	......
......	......	......	......

13. **Does your station carry editorials? Yes .... No ....**

If "yes," list the subject matter, length of time, and check the source of editorials which your station broadcast during the January — March 1966 period.

Subject	Time in minutes	No. of Times per Week	Source Headquarters	Local
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....
....	....	....	....	....

14. **Indicate the degree of influence each of the following exerts on the station's editorial position.**

	Very Great	Great	Moderate	Little	Very Little	None
Owner	....	....	....	....	....	....
Board of Directors	....	....	....	....	....	....
Headquarters	....	....	....	....	....	....
Station Manager	....	....	....	....	....	....
Program Director	....	....	....	....	....	....
News Director	....	....	....	....	....	....
Editorial Writer(s)	....	....	....	....	....	....
Local Interest Groups	....	....	....	....	....	....
Position Taken by Other Media	....	....	....	....	....	....
Other (please specify)	....	....	....	....	....	....
....	....	....	....	....	....	....

15. **Indicate the degree of dependence upon each of the following as news sources (i.e., news reports and commentaries).**

	Very Great	Great	Moderate	Little	Very Little	None
National Wire Services	....	....	....	....	....	....
Local News Service or Bureau	....	....	....	....	....	....
Station Reportorial Staff	....	....	....	....	....	....
Staff of Affiliated Newspaper	....	....	....	....	....	....
Group's News Organization	....	....	....	....	....	....
Network News Organization	....	....	....	....	....	....
Press Releases:	....	....	....	....	....	....
Local or State Government	....	....	....	....	....	....
National Government	....	....	....	....	....	....
Local Private Groups	....	....	....	....	....	....
National Private Groups	....	....	....	....	....	....
Other (please specify)	....	....	....	....	....	....
....	....	....	....	....	....	....

16. Please indicate the methods and sources used in trying to determine the kinds of news and public affairs programming your community wants and how often you refer to these sources.

....

....

C. FINANCIAL DATA

17. Please indicate the cost and revenue of nonnetwork programs broadcast during the January — March 1966 period.

Nonnetwork Programs	Total Hours of Broadcast Time	Total Cost*	Total Time Sales
Produced by:			
Group Headquarters	....	$........	$ ....
Station	....	....	....
Acquired by Station from:			
Group Headquarters	....	....	....
Independent Producers	....	....	....
Other (please specify)			
....	....	....	....
....	....	....	....
Total	....	$........	$.............

**Purchase price, rental price, or production cost (net of commissions).*

18. Indicate sales of programs produced by your station during the January — March 1966 period.

Sales to:	Amount of Sales	No. of Hours of Program Time
Other stations in your group	$...............	....
Stations not in your group	....	....

19. Estimate the dollar value of the support your station has given to educational television. If details not available please report total amounts.

	During 1965	Since Inception of ETV
Financial	$.........	$ ....
Equipment	....	....
Technical Advice	....	....
Facility Use	....	....
Other (please specify)	....	....
....	....	....
Total	$.........	$..................

Name .... Title .... Station ....

Mail to:

United Research Incorporated
1730 Cambridge Street
Cambridge, Massachusetts 02138

SUMMARY OF QUESTIONNAIRE RESPONSES

A. Number of stations responding: 81

B. Distribution of stations:

1. Market Rank:	No. of Stations
1- 10	17
11- 20	11
21- 30	14
31- 40	8
41- 50	6
51-100	13
101 and Over	12
Total	81

2. Form of Ownership:	No. of Stations
Group-Owned	59
Single-Owner	16
Network	6
Total	81

3. Network Affiliation:	No. of Stations
Affiliates	68
Independents	13
Total	81

4. UHF vs. VHF:	No. of Stations
VHF	77
UHF	4
Total	81

STATIONS INTERVIEWED

Market	1965 Market Rank	Station Call Letters	Owner [a]	Affiliation
Los Angeles, Calif.	2	KCOP	Chris-Craft	Independent
Chicago, Ill.	3	WGN	Tribune	Independent
Boston, Mass.	5	WNAC	RKO General	ABC
San Francisco, Calif.	7	KTVU	Cox	Independent
San Francisco, Calif.	7	KGO	ABC	ABC
Washington, D.C.	10	WTOP	Washington Post	CBS
Washington, D.C.	10	WRC	NBC	NBC
Washington, D.C.	10	WMAL	Evening Star Bcstg.	ABC
Washington, D.C.	10	WTTG	Metromedia	Independent
Baltimore, Md.	11	WBAL	Hearst	NBC
Dallas/Ft. Worth, Texas	15	KTVT	WKY TV	Independent
Dallas/Ft. Worth, Texas	15	WBAP	Single Owner	NBC
Dallas/Ft. Worth, Texas	15	WFAA	Single Owner	ABC
Dallas/Ft. Worth, Texas	15	KRLD	Single Owner	CBS
Minneapolis/St. Paul, Minn.	17	WTCN	Chris-Craft	Independent
Minneapolis/St. Paul, Minn.	17	KSTP	Hubbard	NBC
Atlanta, Ga.	19	WSB	Cox	NBC
Miami, Fla.	20	WLBW	Single Owner	ABC
Miami, Fla.	20	WTVJ	Wometco	CBS
Seattle/Tacoma, Wash.	21	KIRO	Bonneville International	CBS
Seattle/Tacoma, Wash.	21	KTNT	Single Owner	Independent
Sacramento/Stockton, Calif.	27	KXTV	Corinthian	CBS
Columbus, Ohio	30	WBNS	Single Owner	CBS
Columbus, Ohio	30	WTVN	Taft	ABC
Tampa/St. Petersburg, Fla.	32	WTVT	WKY TV	CBS
Harrisburg/Lancaster Lebanon/York, Pa.	33	WHP(UHF)	Single Owner	CBS
Memphis, Tenn.	34	WHBQ	RKO General	ABC
Memphis, Tenn.	34	WREC	Cowles	CBS
Portland, Oregon	36	KGW	King	NBC
New Orleans, La.	43	WDSU	Royal Street	NBC
Greenville/Spartanburg, S.C./ Asheville, N.C.	44	WFBC	Southeastern	NBC
Greensboro/Winston-Salem/High Point, N.C.	49	WFMY	Norfolk-Portsmouth	CBS
Wilkes-Barre/Scranton, Pa.	70	WNEP(UHF)	Taft	ABC
Mobile, Ala./Pensacola, Fla.	75	WALA	Royal Street	NBC
Greenville/Washington/ New Bern, N.C.	89	WITN	Single Owner	NBC

[a] Note that the owner indicated here reflects the status as of the date the field interview took place.

QUESTIONNAIRE RESPONDENTS

Market	1965 Market Rank	Station Call Letters	Owner [a]	Affiliation
New York, N.Y.	1	WCBS	CBS	CBS
New York, N.Y.	1	WOR	RKO General	Independent
New York, N.Y.	1	WPIX	Tribune	Independent
Los Angeles, Calif.	2	KNXT	CBS	CBS
Los Angeles, Calif.	2	KCOP	Chris-Craft	Independent
Los Angeles, Calif.	2	KHJ	RKO General	Independent
Chicago, Ill.	3	WBBM	CBS	CBS
Chicago, Ill.	3	WGN	Tribune	Independent
Philadelphia, Pa.	4	WCAU	CBS	CBS
Boston, Mass.	5	WNAC	RKO General	ABC
Detroit, Mich.	6	WJBK	Storer	CBS
Detroit, Mich.	6	WWJ	Single Owner	NBC
Cleveland, Ohio	8	WJW	Storer	CBS
Cleveland, Ohio	8	WKYC	NBC	NBC
Cleveland, Ohio	8	WEWS	Stripps-Howard	ABC
Pittsburgh, Pa.	9	WIIC	Cox	NBC
Washington, D.C.	10	WMAL	Evening Star	ABC
St. Louis, Mo.	12	KMOX	CBS	CBS
St. Louis, Mo.	12	KTVI	Newhouse	ABC
Dallas/Ft. Worth, Texas	15	KTVT	WKY TV	Independent
Cincinnati, Ohio	16	WLW-T	Avco	NBC
Minneapolis/St. Paul, Minn.	17	WTCN	Chris-Craft	Independent
Indianapolis, Ind.	18	WTTV	Sarkes/Tarzian	Independent
Indianopolis, Ind.	18	WFBM	Time-Life	NBC
Atlanta, Ga.	19	WAGA	Storer	CBS
Atlanta, Ga.	19	WSB	Cox	NBC
Seattle/Tacoma, Wash.	21	KIRO	Bonneville International	CBS
Buffalo, N.Y.	22	WGR	Taft	NBC
Buffalo, N.Y.	22	WKBW	Capital Cities	ABC
Milwaukee, Wisc.	23	WUHF(UHF)	Single Owner	Independent
Milwaukee, Wisc.	23	WITI	Storer	ABC
Kansas City, Mo.	24	KMBC	Metromedia	ABC
Kansas City, Mo.	24	KCMO	Meredith	CBS
Houston, Texas	25	KPRC	Hobby	NBC
Houston, Texas	25	KHOU	Corinthian	CBS
Toledo, Ohio	26	WSPD	Storer	ABC
Sacramento/Stockton, Calif.	27	KXTV	Corinthian	CBS
Dayton, Ohio	28	WHIO	Cox	CBS
Dayton, Ohio	28	WLW-D	Avco	NBC, ABC
Charlotte, N.C.	29	WBTV	Jefferson Standard	CBS
Columbus, Ohio	30	WLW-C	Avco	NBC

(continued on p. 304)

[a] Note that the owner indicated here reflects the status as of the date the field interview took place.

Market	1965 Market Rank	Station Call Letters	Owner [a]	Affiliation
Columbus, Ohio	30	WTVN	Taft	ABC
Wheeling, W. Va./Steubenville, Ohio	31	WTRF	Single Owner	NBC
Tampa/St. Petersburg, Fla.	32	WTVT	WKY TV	CBS
Memphis, Tenn.	34	WHBQ	RKO General	ABC
Memphis, Tenn.	34	WREC	Cowles	CBS
Albany/Schenectady/Troy, N.Y.	37	WRGB	Single Owner	NBC
Grand Rapids/Kalamazoo, Mich.	38	WOOD	Time-Life	NBC
Grand Rapids/Kalamazoo, Mich.	38	WZZM	Single Owner	ABC
Birmingham, Ala.	39	WBRC	Taft	CBS, ABC
Denver, Col.	40	KLZ	Time-Life	CBS
Denver, Col.	40	KWGN	Tribune	Independent
Nashville, Tenn.	42	WSIX	Single Owner	ABC
New Orleans, La.	43	WDSU	Royal Street	NBC
Greensboro/Winston Salem/ High Point, N.C.	49	WFMY	Norfolk-Portsmouth	CBS
Oklahoma City, Okla.	51	WKY	WKY TV	NBC
San Diego, Calif.	54	KOGO	Time-Life	NBC
Wichita/Salina, Kans.	56	KARD	Kansas State Network	NBC
Wichita/Salina, Kans.	56	KSLN(UHF)	Single Owner	ABC
San Antonio, Texas	57	KONO	Single Owner	ABC
Omaha, Nebr.	60	WOW	Meredith	CBS
Roanoke/Lynchburg, Va.	61	WLVA	Single Owner	ABC
Roanoke/Lynchburg, Va.	61	WDBJ	Single Owner	CBS
Phoenix, Ariz.	62	KPHO	Meredith	Independent
Rochester, N.Y.	68	WROC	Rust Craft	NBC
Jacksonville, Fla.	72	WJXT	Washington Post	CBS
Fresno/Hanford, Calif.	91	KSJV(UHF)	Single Owner	Independent
Lincoln/Hastings, Nebr.	93	KOLN	Fetzer	CBS
Augusta, Ga.	96	WJBF	Fugua	NBC, ABC
Charleston, S.C.	119	WCSC	Single Owner	CBS
Hannibal, Mo./Quincy, Ill.	126	KHQA	Lee	CBS, ABC
Wausau, Wisc.	136	WSAU	Wisconsin Valley	CBS, ABC, NB
Santa Barbara/Santa Maria, Calif.	137	KEY-T	Key TV	ABC
Santa Barbara/Santa Maria, Calif.	137	KCOY	Single Owner	ABC
Bakersfield, Calif.	146	KERO(UHF)	Time-Life	NBC
Odessa/Midland, Texas	147	KOSA	Trigg-Vaughan	CBS
Boise, Idaho	162	KBOI	Single Owner	CBS
Bowling Green, Ky.	171	WLTV	Single Owner	Independent
Bellingham, Wash.	179	KVOS	Wometco	CBS

[a] Note that the owner indicated here reflects the status as of the date the questionnaire was completed.