

THE PROPAGANDA MODEL: CORPORATE AND POLITICAL COLLUSION IN  
THE CREATION OF AN OLIGOPOLISTIC MAINSTREAM U.S. MEDIA

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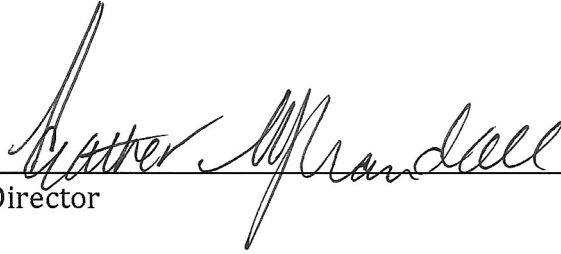
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By

Frank McCloy

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We the undersigned, certify that we read this thesis and approve it as adequate in scope and quality for the degree Master of Arts.



\_\_\_\_\_  
Thesis or Project Director



\_\_\_\_\_  
Faculty Mentor

\_\_\_\_\_  
Faculty Reader

Gonzaga  
University

MA Program in Communication and Leadership Studies

## ABSTRACT

The mass media in the United States have a wide breadth of power and influence over society. Yet, despite the crucial role the media play they are controlled by only six companies that are mega transcultural conglomerates. (Legislation has been passed, namely) The Telecommunications Act of 1996 has encouraged and enabled the rash of media consolidations that has led to the dense concentration of media ownership today. This thesis utilized the Propaganda Model as the theoretical foundation to examine the relationships between the elites of the corporate and political sectors integral to the creation of the current media landscape. A triangulation of methods, which include content analysis, a case study, and meta-synthesis methods, was used to gather data. The case study examined in this thesis was the merger of Comcast and NBC in 2011. As part of the case study, content analysis of coverage given to the merger in the *NY Times* was conducted to determine whether there was a pro- or anti-merger bias evident. Meta-synthesis methods were used to amalgamate the findings of the case study into a coherent assessment of corporate and political relations in approving the merger. This study's findings consist of significant political connections and lobbying dollars spent on the part of Comcast, a pro-merger bias in *NY Times* coverage, increased prices for consumers and reduced television content for viewers. The Propaganda Model was instrumental in conceptualizing the findings of this study by providing a framework of media filters and first-, second-, and third-level predictions about media behavior. The results suggest that collusion between corporate and political officials played a key role in the consolidation of Comcast and NBC, and that the public interest was impacted negatively.

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## **Chapter 1. INTRODUCTION**

### **Importance of the Study**

The oligopoly that controls the nation's news and information was established with help of governmental policy and corporate maneuvering for socio-economic reasons (Mosco, 2008). The result of which is a handful of media-owning companies whose primary source of revenue is advertising. In terms of the mainstream news media, this is a crucial consideration because messages that are supposedly unbiased, accurate views of the world are instead propagandist reinforcements of the corporate and political elite interests who have a stake in the messages put forth. Noam Chomsky (cited in Achbar, 1992) explains that the primary function of the mass media is to stimulate support of the special interests that exercise control of the government and private sectors. This thesis examines the collusive dealings between the corporate and political sectors by using the recent merger of Comcast and NBC as a case study.

The issue of corporate and political collusion in creating an oligopolistic corporate-controlled media is a critical topic for study because of its threat to a free democracy and a free press. It is important to address this issue because an oligopoly of corporate-owned media is narrowing the public's options for news, setting agendas that are convenient and profitable for political and corporate institutions salient, and marginalizing dissenting voices. Although it has been 16 years since the passage of the Telecommunications Act of 1996 a succinct analysis of its passage and the effects it has had on the media landscape is necessary in order to contextualize this thesis' case study. The effects most relevant to the case study are that of a densely consolidated media environment, corporate ownership's increased need to cut costs and rely on "official"

sources for information, and collusive dealings between the corporate and political sectors in creating an oligopolistic media state that serves elite interests at the expense of the public interest.

### **Statement of the Problem**

The mainstream news media have a ubiquitous presence in people's lives; however, with only six mega conglomerates dominating the vast majority of the U.S. media landscape, we as a citizenry are subject to the messages and interests of the controlling parties (Common Cause 2012). Considering the dense corporate control of the mainstream news media, which provide the public with information to make decisions in their lives, participate in politics, and have a clear, accurate view of the world it is important to study the issue of media consolidation because America is a land of democracy in which everyone supposedly has a voice. In a land where the majority rule, the majority is being ruled and dictated to by giant corporations fixated on maximizing profits for themselves and for their shareholders.

Potter (2008) explains, "Our automatic code has been programmed by the mass media and advertisers. When we are not consciously paying attention and carefully evaluating our media exposures, the mass media continually reinforce certain behavioral patterns of exposure until they become automatic habits" (p. 8). Because of this we often times fail to think critically about the media's influence.

The case study analyzed in this thesis is the recent merger of the Comcast Corporation and NBC. This merger is worthy of in-depth analysis because Comcast is the largest cable provider in the country, and NBC, as a broadcast television network, is one

of the largest producers of content. In essence, the same company is in control of the production and distribution of much of the nation's media content.

### **Definition of Terms**

- 1.) Mainstream (Mass) Media – For-profit commercial media outlets, owned and operated by corporations that are funded primarily by advertising revenue. Mass media consist of newspapers, magazines, radio, television, and Internet outlets.
- 2.) Oligopoly – A state of limited and concentrated competition, when a small handful of companies have control over a given market of audience or commodity.
- 3.) Public Voice / Public Interest – Terms to express the opinions, wants, and needs of ordinary citizens of the middle class or impoverished portions of society. The public is the audience of the mass media and often times have little to no say in political and corporate actions. The public is mutually exclusive from the elite or ruling classes.
- 4.) Telecommunications Act of 1996 (1996 Act) – Government legislation enacted to deregulate media ownership that resulted in a glut of mergers and media oligopoly.
- 5.) Anti-capitalism: a substitute for the propaganda model's fifth filter, anti-communism, to keep it relevant to current times and analysis of this thesis' case study. The newly termed filter suggests the media will reinforce the capitalist ideology and anything or any person deemed anti-capitalist is portrayed as an enemy.
- 6.) Official Sources: Government, business firm, and/or powerful institution officials that are relied heavily on by the mainstream media for information. These sources are deemed “official” because of their supposed prestige and rank within their respective fields.

**Organization of Remaining Chapters**

This study is comprised of five chapters. The following chapter reviews the literature on this study's theoretical framework: the propaganda model and political economy of communication, as well as literature on the Telecommunications Act of 1996. Chapter two also includes a synopsis of the cultural studies work that serves as the underlying philosophical assumptions for this study. As such, class struggle resulting from the corporate sector's control of the media, their ability to dictate meaning and perception for the public, and the media's continual reinforcement of capitalist ideology at the expense of the public interest are enduring considerations for delving into this thesis' case study. Chapter three explains the scope and methods utilized for data collection. In chapter four the results of the study are presented, and examined in light of the research questions posed. Chapter five covers the limitations of the study, recommendations for further research, and conclusions and summaries.



## **Chapter 2. LITERATURE REVIEW**

This chapter reviews the literature on Edward Herman and Noam Chomsky's propaganda model, as well as the political economy of communication. These theoretical concepts are useful to understand the issue of corporate and political collusion in creating an oligopolistic corporate-controlled media environment. The socio-economic implications of media consolidations and newsgathering practices are analyzed on a macro level. A micro-level analysis of media coverage of the Comcast/NBC merger, which serves as the case study for this thesis, is presented in Chapter 3.

This thesis argues that the public interest is at severe risk when media companies are funded and owned by giant corporations, and under the influence of official political news sources and associations.

### **Philosophical Assumptions**

The mass media, in one form or another, tend to be a focal point for a significant portion of most people's day. As independent citizens we consciously elect to purchase cable, Internet, and newspaper (print or online) subscriptions so that we can engage in whichever way we choose with the services the media provide. As a result, the mass media wield a considerable amount of power and influence on us as a society in terms of our decision-making, and our spending. They assist, though some may argue they direct, us in making meaning of signs and events, and determining our political affiliations amongst a host of other decisions. A study of media, politics, economics, corporations, and what their roles are in creating a dense concentration of ownership, which this study does to varying degrees, is ultimately rooted in cultural studies. The work of Stuart Hall, Roland Barthes, Michel Foucault, Karl Marx, and the Frankfurt School theorists play a

significant role in analyzing the issue of media ownership because of the power and class relationships involved, as well as the media's power to create meaning and influence society. Kyong Kim (as cited in Griffin, 2009), an author on semiotics, summed it up best in saying:

Information delivered by mass media is no longer information. It is a commodity saturated by fantasized themes. Mass audiences are nothing more than consumers of such commodities. One should not forget that, unlike nature, the media's reality is always political. The mass signification arising in response to signs pouring from the mass media is not a natural process. Rather it is an artificial effect calculated and induced by the mass media to achieve something else. (p. 330)

The most significant aspects of cultural studies that are explored in this thesis are that of the Marxist interpretation of society that deals with power relationships, private industry's take over of the media in successfully crafting messages to support the capitalist system, and the media's ability to make and change meaning amongst citizens in a society (Griffin, 2009, p. 336). The role of a democratic media in society should be one that is a voice of the people and for the people, as opposed to current mainstream media's role that is a voice of the dominate elite and for the dominate elites. Robert McChesney (2004) advocated for a free press because the media, he warns, are corporate entities that have benefited from political legislation and serve only to reinforce the capitalist system so as to protect their rights to, and encourage their ability to, profit monetarily (p. 11). Democratic media should serve the public interest by way of educating, informing, and empowering citizens free of corporate and/or political

influence and indoctrination to a capitalist only ideology.

Cultural studies provide a useful foundation for this thesis because much of what comprises cultural studies is involved with and/or is at stake when dealing with corporate and political collusion in creating an oligopoly of corporate-controlled media. The literature reviewed in this study is centered on the propaganda model (PM); however, adding support for the theory and the myriad socio-political influences and implications involved was the political economy of communication (PEC). Albeit to a lesser degree than the PM, literature on the PEC was reviewed as was scholarly literature concerning the Telecommunications Act of 1996 (1996 Act), the most significant piece of legislation to date regarding media ownership.

### **The Literature- Propaganda Model**

The theoretical foundation of this report is Edward Herman and Noam Chomsky's propaganda model (PM). In short, the model contends that mass media institutions are owned and controlled by large corporations whom have relationships in business and social circles with other corporations and political officials. These relationships result in self-censorship on the part of the media entities because they depend on advertising revenue and political support from their sponsors and cohorts. It is argued that the media are unable to detach themselves analytically from the dominant sectors because of these economic, political, and social relationships (Herman & Chomsky, 1988). Herman and Chomsky identified five filters through which news must pass before going public. The five filters, which are discussed in the following, shape media performance and are a result of the media's relationships with corporate and political institutions.

Florian Zollmann (2009) investigated professional ideology versus corporate-

media constraints by analyzing the issue through the view of the PM. In her critical assessment of the model she noted the importance of the model's five interacting and reinforcing news filters (ownership, advertising, sourcing, flak, anti-communism); however, Zollmann focused primarily on the third. Professionalism and objectivity on the part of a news reporter yield to the third filter of the model, which is news media's dependence on what are called "official sources". These sources are typically government officials and policy makers, or people of importance in a number of other powerful institutions, including even employees of the corporate ownership of the particular news outlet reporting. Chomsky (Herman & Chomsky, 1988) elaborated saying that journalists are not to blame because the filters occur naturally from an inverted pyramid chain-of-command structure. Reporters are merely doing their jobs and are unaware of the filters influencing their performance. Herman (1996) posited "professionalism has also internalized some of the commercial values that media owners hold most dear, like relying on inexpensive official sources as the credible news source" (p. 118).

In regards to American capitalism and democracy, Zollmann (2009) found opposition to the model because of its theoretical-absolute approach. Zollmann ceded to Simon Cottle (2000) and Daniel Hallin's (1989, 1994) assertions that journalistic ideology and indexing have merit in the discussion of problematic media behavior. In detailing indexing theory Zollmann found that it is similar to the PM in terms of media serving elite interests; however, she found that it is not as comprehensive as the model because of its lack of consideration of corporate elite interests. The basic premise of indexing is that media coverage of an issue will reflect the parameters of debate and discussion set by official political sources as opposed to the consideration of dissident

voices from outside the “official” spectrum. In terms of examining the role of corporate and political collusion it is understandable that indexing falls short when investigating the problem of said complicity in creating an oligopoly of mass media ownership.

Jeffery Klaehn (2002, 2003) took a systematic look at the overarching influences on the news media and identified the macrostructure of corporate ownership as having a direct effect on the style, perhaps even the substance, of content. Klaehn made the connection to Chomsky’s critical analysis of the macrostructural influence with the poignant terminology Chomsky uses such as “brainwashing”, “control”, and “manufacturing” in finding relevancy to social organization and ruling class interests. Critics of the model cite the extreme language the model utilizes as detrimental to its acceptance in scholarly debate (Mullen, 2009). However, many of those critics fail to recognize that Chomsky is an accomplished linguist, which makes him an authority on the use of the model’s language. Furthermore, considering the dire ramifications of past propaganda campaigns in Nazi Germany, and communist Russia, two oft cited examples of such by Herman and Chomsky, extreme language is both fitting and appropriate (Herman, 2000).

Using global institutions such as World Bank, World Trade Organization and transnational corporations as evidence of an increasingly powerful and influential globalized market, Klaehn (2009) found that the PM is validated in its assertions that corporate and political influences on news media serve to manufacture consent and subject ordinary citizens to dominant elite interests. Klaehn drew parallels between the model and Marxian ideology when discussing the model’s conception of social class in regards to corporate consolidation, monopoly ownership, and elite interests superseding

that of the public interest. Klaehn also argued for the model's applicability in conducting empirical research into the media's legitimization of power and powerlessness in regards to workers' rights and labor union issues. Furthermore, Klaehn mentioned Herman's (cited in Klaehn, 2008) assertion that the model's theory originates from the works of British economist Alfred Marshall who is widely credited for the economic model of industrial organization. In doing so, Klaehn noted the relationships Herman and Chomsky have highlighted between government, big business, and mass media.

Klaehn (2009) discussed the methodological techniques associated with the model. Although he criticized Herman and Chomsky for their negligence to produce a piece of literature addressing their methodology he did cite the model's versatility in applicability to a wide variety of issues as a strength. Klaehn referenced Herman and Chomsky's use of a case study approach to the paired example methodology, which they claim provides insight into how media prioritize similar events. A brief example given by Klaehn is the media representation of domestic and international events. Unfortunately, Klaehn failed to give a detailed example of such an instance. In fact, a limitation of Klaehn's methodological techniques section is his inability to provide a relevant example of media events in relation to the techniques discussed. The effort Klaehn demonstrated in this regard stopped at the mention of domestic versus international coverage and a bevy of suggested applications and analyses. One of the strengths of Klaehn's methodological techniques discussion, however, is his insistence that said techniques can and should be viewed quantitatively and qualitatively. Klaehn (2009) added further, "the range of topics the PM can theoretically be applied to is limited only by the creativity and

imagination of the researcher” (p. 54). Thus, it is clear that the model is not only versatile, but also relevant long after its creation.

Similarly, in regards to Klaehn’s work regarding the manufacture of consent by big business, Zollmann (2009) listed the monetary amounts the U.S. and U.K. governments spend on public relations, thus illustrating the link between political and corporate interests on the news media. In revisiting his own model, Herman (1996) presented statistical support for said link in claiming “a significant proportion of news originates in the PR industry. There are, by one conservative account, 20,000 more PR agents working to doctor the news today than there are journalists writing it” (p. 121). The link Zollmann identified suggests that political spending is used to create a politically approved image of government. The public relations firms, which are an extension of the mass media, then sell the image or information to news outlets. Thus, there is not just a monetary link between government, corporate, and mass media institutions – there is also a propaganda link. Zollmann added to this evidence of a propaganda link by detailing changes in the British press after the Second World War. She cited the dramatic increase of consolidated media ownership and cross ownership, in addition to a dwindling of circulation, as the catalysts for intense pressure to raise profits. Zollmann referenced Bob Franklin’s (1997) assertion, in his book *Newszak and News Media*, that the demands to increase profits victimized a significant number of employees who lost their jobs due to downsizing. In addition, Franklin contended that a decline in journalistic integrity was due to more lax newsgathering and reporting practices, which resulted in tabloidization. It can be argued that the most victimized subject in a post-war British society is the citizenship at large who is exposed to a subpar news media, loss of

jobs, and corporate constraints.

Zollmann (2009) used content analysis with the PM as a theoretical structure in her examination of ideology and corporate constraints. In using the model's five filters, chiefly the third, to wage her argument, Zollmann challenged what has been considered the very essence of journalism: professionalism and objectivity. Her findings concluded that the professionalism of journalism and its chief norm of objective reporting were the result of corporate and political integration. She referenced Richard Keeble's (2006) assertion that objectivity is a "myth" used to legitimize the mainstream media's promotion of elitist interests. The limitation of her analysis is the lack of tangible examples. Rather than offer concrete evidence Zollmann instead called on various scholars' work to draw connections to political economy of communication in order to substantiate her argument of market and corporate constraints limiting the scope of permissible debate in the media.

Indexing theory was only briefly described in Zollmann's text, but was examined and tested by Harp, Loke, and Bachmann (2010). The reason for its inclusion in this study is because it offers qualified support of the PM, at least in terms of political influence on the media and a scope of permissible content and debate in journalistic reporting. Harp et al. (2010) used the Iraq war as a case study to investigate the theory. Harp et al. (2010) argued the basic premise of indexing, which is that media coverage reflects the official range of debate as dictated by the powerful elite rather than dissident views from outside the traditional power sources. The study hypothesized that the media's coverage of dissent towards the war will be comprised mostly of official sources as opposed to civilian or journalist opinion. Examining whether or not indexing theory is



weakened by what Niven (2004) describes as a consensus breakdown, Harp et al. (2010) used data from a quantitative content analysis of all stories about the Iraq war published over a five-year span in the print edition of *Time* magazine starting in March 2003. In all, 406 stories were collected and the results confirmed the hypothesis that criticism of the war came primarily from official sources. With only 23% of the criticism coming from American or Iraqi civilians it was confirmed that the media focused mainly on the traditional power centers.

Harp et al. (2010) concluded that the study supports indexing theory because the majority of disagreement towards the war came from official sources. The authors asserted that the news media failed to question the administration's decisions and rationale for war. Rather than investigate, the news media relied on official sources, which served as a propagandist arm of the government.

Furthermore, Andrew Kennis (2009) evaluated the extent to which indexing and the PM are applicable to the case of the uprising in Ecuador in 2000. Kennis utilized a content analysis approach and detailed coding to compare official to unofficial sources in media coverage. The sources examined were six major daily newspapers in the U.S., *The New York Times*, *Washington Post*, *San Diego Union-Tribune*, *Los Angeles Times*, the *Houston Chronicle*, and the *Miami Herald* from January 1, 2000 through April 1, 2000. Kennis found support of both indexing and the PM, and he concluded that they work well together in explaining and predicting media coverage in print sources.

Citing concentrated media ownership as a detriment to a free democracy Pamela Taylor Jackson and James Ronald Stanfield (2004) called for the reinstatement of what they termed the 'public purpose' for broadcast licensing. Jackson and Stanfield explicated

the media's crucial role in democracy and then systematically showed how the PM's five filters were clearly visible in telecommunication policy and its ensuing results. A glaring fact is the change in the number of corporations that own the media, which Jackson and Stanfield cited as fifty in 1983, twenty in 1992, and down to just six as of 2004.

Referenced throughout the article are instances of FCC action that ran counter to citizen protest, the Ronald Reagan administration's systematic dismantling of FCC regulation, and repeated quotes of then FCC chairman Michael Powell speaking in glowing terms of the free market and trivializing the public interest standard as "about as empty a vessel as you can accord a regulatory agency" (p. 480).

While Jackson and Stanfield made mention of the political economy of communication in detailing the media's responsibility to democracy they did not delve into the corporate aspect of the PM and media ownership. Rather, they focused more on the political implications even when discussing the Fox effect and jingoism as a flak filter. In short, the Fox effect is named after Fox News, which is owned by one of the six mega-media conglomerates today, NewsCorp. The Fox effect served as a flak filter by characterizing any oppositional voices to the Iraq war as wrong, unpatriotic, and unworthy of attention. This resulted in other media outlets self-censoring themselves on war talk and marginalizing any views or opinions that were deemed oppositional to the war.

Similarly, the PM's third filter, sourcing, was used in a pro-war biased fashion. Jackson and Stanfield (2004) described the role of embedded reporters during the war as little more than public relations puppets of the military. The media were fed images, stories, and information from official military personnel on the battlefield in such a way

that glorified U.S. actions and mitigated understandings about the actual destruction of the war. Embedded reporters essentially painted a picture of war as one of noble cause on the part of America and just about denied any unjust and egregious violence (p. 478).

In light of the PM and, most notably, Herman and Chomsky's call for a free press and democracy Jackson and Stanfield (2004) pled for the reinstatement of the public interest requirement for all FCC licensing rulings. They feel that a public interest standard that is rooted in a democratic criterion is one of America's only hopes of restoring a democratic news media.

Revisiting the focus of Zollmann's (2009) work previously in terms of professionalism and corporate constraints, Colin Sparks (2007) revealed further support for the PM in his refinement of the model and examination of the appeal of newspapers to a mass audience. Sparks asserted (2007), "it is a condition of successful propaganda that media engage with their audience" (p. 76). Engagement, according to Sparks, does not entail a full assault of propaganda material. Rather, a broad scope of stories, many of which serve no propaganda purpose other than gathering a reading audience, are published to engage, attract, and indoctrinate an audience to the interests of the corporate ownership and sponsors.

Peter Thompson (2009) detailed the problem of professionalism and corporate constraints on reporters in his application of the PM to financial news reporting. In his study, he found that compressed news cycles, constantly changing complexities of financial trading, and a lack of sufficient qualifications on the part of reporters make it impossible for reporters to verify the facts they get from "official" financial sources. One senior bank trader interviewed for Thompson's study admitted to making up frames for

stories of financial events when he felt pestered by reporters looking for a story. Clearly, professionalism and corporate constraints make a reporter's job difficult, if not impossible, to do accurately and with integrity when "official" sources are relied on for the majority of news.

It should be evident by now that the PM is a useful tool in assessing media performance and behavior during times of peace. Des Freedman (2009), however, tested the model during moments of crisis to see if it is still applicable. Freedman analyzed the British tabloid the *Daily Mirror's* coverage of the lead up to the Iraq war in 2003. Firmly established was the fact that the PM does not rule out the possibility of oppositional opinions and views in media discourse. Herman is cited occasionally by Freedman in clarifying the model's stance of being an assessment of media behavior and not effects, which is to say that there is certainly room for different viewpoints, but that ultimately the aims and interests of the ruling elite will be reinforced. Freedman affirmed, "While resistance may be possible, the PM is predicated on the basis that there is a 'default' position of media consensus, elite power and audience passivity" (p. 61). Ultimately, however, Freedman did find that the PM is lacking in its ability to expose the limits of contemporary media, and thus calls for a system that "emphasizes both structure and agency, contradiction and action, consensus and conflict" (p. 71), much in the way of theorists Marx, Lukacs, and Gramsci propose.

Many critical of the PM claim it no longer holds relevancy in a more globalized and technologically driven society than the one in which Herman and Chomsky first developed the model. Andrew Mullen (2009) interviewed Herman and Chomsky to find out if they feel their model is still relevant and if there are any revisions they deem

worthy of inclusion if creating a PM now, 20 years after the original. The model's authors defended their first hypothesis that the media will serve elite interests steadfastly when there is elite consensus by rehashing a few of their original claims and drawing parallels to modern examples. One such example is that of the Vietnam and Iraq wars. The authors claimed that the elite stayed consistent with the administration line and excluded criticism of the war from their reporting.

Herman and Chomsky (cited in Mullen, 2009) defended their second hypothesis regarding the five filters on the media. They noted how government policy has allowed for and encouraged a great concentration of media ownership, which gives further credit to their first filter. They drew on political economy in detailing the model's next two filters in current times. They claimed that right-wing politics have forced public radio and television to rely more on advertising as a source of funding. Additionally, with more concentrated ownership there is now a greater focus on generating revenue and cutting expenses. As a result, all media entities rely more heavily on advertising to generate revenue and official sources to cut expenses. They continued to claim that flak is present more now than ever due to the Iraq war and an increase in right-wing media attacks by way of talk shows and blogs. They cited the Swift Boat Veterans of Truth as an example of right-wing media flak during the Bush vs. Kerry presidential election campaign of 2004. In regards to the anti-communism filter, Herman and Chomsky explained that communism is not nearly as threatening as it was when the model was first constructed, but the filter still holds considerable weight in assessing media performance. They submitted 'free market' as a replacement for 'anti-communism' considering its prominent ideological status as the basis for the new world order.

In terms of revisions, the authors asserted that the model only needs updating such as the fifth filter being renamed ‘free market’ and a greater emphasis on globalization. They stated the Internet age and new forms of media such as blogging and podcasting could make the model marginalized in its applicability but they haven’t seen proof of such, nor do they believe that they will. Their confidence in its prolonged relevancy and applicability is rooted in the economics involved with the Internet and any alternative media that may arise from it. In other words, advertising, sourcing, and critical analysis will remain vibrant, which is crucial to the model’s usefulness. The only threat they can foresee to the model’s relevancy is a reduction in class status and social hierarchy. According to Herman and Chomsky, this is only possible with a radical change in the political economy, which could be assisted by an uprising of alternative media forms revolting against FCC and congressional policies that further limit media concentration. Literature of PEC and the 1996 Act will be reviewed later in this chapter, but first, it is critical to review tangible examples of the model at work in the media.

Advancing the model’s flak filter and claim of a right-wing bias in the media, despite popular opinion of a liberal agenda, is Brian Goss’ (2009) examination of Accuracy in Media’s (AIM) bi-weekly “Reports”. Most keenly relevant to the discussion presented in this study is Goss’ assertion that, “news media is itself a profit-driven business and generally comfortable with the United States’ steering mechanism of oligopolist capitalism” (p. 455). As such, Goss demonstrated that AIM is anything but the fair, balanced, and accurate media watchdog group that it claims to be.

Analyzing 36 AIM “Reports” from January 2007 through July 2008 Goss focused his attention on four issues in particular; torture, climate change, globalization, and

Barack Obama. He pointed out AIM's use of dichotomizations - 'us vs. them or good vs. evil' - to garner support for their stance and generate flak for media outlets that report anything to the contrary. In his investigation, Goss provided support of Herman and Chomsky's contention that AIM is an established entity whose sole purpose is to provide flak to media outlets and persuade them to follow a right-wing foreign policy agenda. Goss used AIM's financial support, mainly from corporations, foundation grants, and subscribers, as well as AIM's discourse on the four issues examined as evidence of the watchdog's right-wing bias. The results of Goss' findings, in terms of AIM content, yielded more evidence of a right-wing bias. Examples of such are AIM's opposition to President Clinton's peace intervention in Yugoslavia, yet full support of President Bush's charge for war, a headline reading "Waterboarding Is Not Torture" (p. 463), the claim that detainees at Guantanamo Bay enjoy "hotel living conditions" (p. 463), and the regurgitation of right-wing talking points when discussing climate control and Barack Obama's Presidential campaign. In all, Goss' investigation provided further qualified support of the PM in terms of exposing a media entity as being influenced by the model's filters and promoting a right-wing bias to favor dominant elites and power centers.

Considering the case study that was examined in this thesis, Oliver Boyd-Barrett's (2004) investigation into the reporting of the *NY Times*' Judith Miller serves as a powerful tool to demonstrate the PM's relevance and applicability to the issue of corporate and political collusion in creating an oligopolistic mass media. Boyd-Barrett (2004) utilized the PM in his analysis of Miller; however, while lauding its usefulness and relevance in assessment of routine news operations he cited the model's shortcomings in instances of departure from the routine. As such, he proposed a sixth

filter that he termed ‘buying out’. The buying out filter is a drastic extension of the PM’s sourcing filter, and is one that Boyd-Barrett admitted to being indirect and circumstantial. The essence of the buying out filter is that of government agencies and authorities buying out individual journalists and/or media entities for the sole purpose of creating their own stories. In effect, these government agencies are using respected reporters or media outlets as personal public relations representatives to disseminate information they deem worthy for public consumption i.e. propaganda puppets. As reprehensible and unbelievable as this may sound Boyd-Barrett offered up a number of instances that serve as direct evidence of media penetration on the part of government agencies.

Examples of said penetration range from investigations of the CIA by the Senate and House in the mid-1970’s that discovered an excess of 400 journalists over a 25-year span were employed by the CIA, to the Reagan administration buying out journalists during a campaign in support of covert operations in Central America. Boyd-Barrett (2004) reported that the Senate and House-led investigations of the CIA in the 1970’s revealed that the CIA published hundreds of books, and owned dozens of newspapers and magazines worldwide in an attempt to undermine the Soviet Union and communism with information that, in many cases, was manufactured. Boyd-Barrett (2004) conducted his own investigation to support the PM’s fifth filter and his own proposed sixth filter. He detailed Judith Miller’s role in leading the charge for pro-war sentiment with her reporting during the lead up to the U.S. invasion of Iraq in 2003.

In listing the array of professional relationships Judith Miller had with government officials Boyd-Barrett firmly established Miller as being an embedded journalist. Despite mounting evidence that the information Miller was reporting was



incorrect, she continued to report the information she was receiving from her official sources, namely Ahmed Chalabi the head of the Iraqi National Congress. Even though Chalabi was a known convicted embezzler and was providing misleading information to Miller her stories appeared on the front page of the *NY Times*. Many of those stories have been credited for building support for the war. Interestingly, Miller never referenced Chalabi in her stories. Rather, she referenced an anonymous source for her information. Boyd-Barrett cited former assistant managing editor Leonard Downie Jr's defense of Miller that the paper is "inevitably the mouthpiece for whatever administration is in power" (p. 443). In the face of mounting criticism of information reported by Miller and other reporters at the *NY Times* executive editor Bill Keller defended their work; however, he apologized for any misinformation and blamed it on overzealous support of claims made by administration officials.

Ultimately, Boyd-Barrett (2004) made a strong case supporting all five filters of the PM as well as his proposed sixth filter as a critical tool to assess media behavior. An interesting point from Boyd-Barrett's analysis is that opposing views were expressed in *NY Times* articles to quell liberals who clamored of too strong of a pro-war stance on the part of the paper. He characterized the paper's behavior as such:

The inclusion of criticism on editorial pages would be necessary for the paper to maintain a credible claim to the provision of diversity of viewpoint and independent analysis, and thus satisfy the substantial population of liberally-minded readers among predominantly middle-class New York readership (the basis of its appeal to advertisers, see below), while at the same time arguably serving the interests of the administration in particular and those of the

establishment more generally through hegemonic framing of the war on the paper's news pages. (p. 445, 2004)

This is important to consider when discussing the results of *NY Times* articles relating to the Comcast/NBC merger, which serves as the case study of this thesis.

Previously in this study, Klaehn (2009) stated that the applicability of the PM is limited only to the creativity of the researcher. Matthew Alford (2009) tested that idea and proposed a Hollywood PM to account for film content supplied by the six biggest film studios. These studios, commonly referred to as 'the majors', are responsible for the majority of the world's movie business. Unsurprisingly, five of the six mega-media conglomerate owners also have a stake in 'the majors': Time Warner, GE, Disney, NewsCorp, and Viacom. Alford called upon Stuart Hall (cited in Procter, 2004) in decoding media texts for meanings and preferences. In conjunction with the use of the PM's filters, mainly the flak and anti-communism filters, Alford concluded that movies are subjected to the same corporate and political influences as the news media.

### **Political economy of communication**

While PEC is worthy of a broader and worldlier discussion on politics, society, and economics it serves as a useful tool in discussing the close relationship between government policy, big business, and corporate controlled media. Mosco (2008) conducted a thorough content analysis of media and communication scholarship, political science scholarship, and government documents to investigate media imperialism and the politics of it, and the social and economic impact of said imperialism. He focused on how no more than a select few nation states and their corporations dominate weaker states and their economies in terms of socioeconomics, military actions and relations, and media

coverage. He asserted that the domination resulted in underdevelopment and dependency of the weaker states on the ruling states. Mosco (2008) argued that a transcultural political economy is the result of corporate integration globally, and political and economic dominance. Transcultural and transnational are terms that Mosco (2008) and other scholars in the PEC field use interchangeably. Both are terms describing a state or object that is comprised of more than one culture or that is cross-cultural.

Communication technologies assist in the transnationalization of culture by creating global labor markets. Mosco (2006) asserted that as corporations become more globalized and consolidate the work force suffers because jobs are lost. Zollmann (2009) offered a pertinent example previously in her reference of Franklin (1997). In her article discussing professional ideology vs. corporate-media constraints, reviewed earlier in this study, she highlighted the post-second world war British press' need to cut jobs so they could increase profits due to an increasingly consolidated media. Franklin assessed transnationalism as having been largely to blame for the more dense media ownership conditions, which resulted in intense pressure to increase profits and, subsequently, a severe loss of jobs. Mosco spoke of just this predicament when he described that powerful governments support corporate globalization and consolidation because it allows them to wield greater influence and dominance throughout the underdeveloped world. Jobs in more powerful nation states are often outsourced to the weaker nation states, or jobs are cut altogether due to corporate consolidation.

Mosco (1999) used New York, arguably one of the most popular cities in the world, as an example of corporate control and power having become synonymous with a lower quality of life for many citizens. To support his contention Mosco pointed to the

disparities between upper- and middle-income groups and upper- and lower-income groups as being the largest gaps in the nation during the 1990's. The problem with corporate consolidation resulting in a loss of jobs in regards to this study is the issue of an all powerful and dominant corporate/political relationship that exerts gratuitous influence and muscle to stifle the public's voice and harm the public interest.

In regards to media, Mosco (2008), like Chomsky and Herman championed, discussed the need for a unified people to fight the threat of a unified, transnational media, which he feared is in the business of subjugating citizens. He asserted that new media technologies have the power to unify people, but believes technologies will eventually be dominated by capitalistic infrastructure and used against the people. Mosco spoke in much the same vein as Herman (1996) when, revisiting the PM, Herman claimed that communication technologies are only compounding the problem of corporate control because those in power are now able to shrink staff, reduce media entities, and globalize even further, faster. Herman warned that any democratizing power that new technologies hold will quickly be used by corporations for undemocratic ends. Mosco endorsed Robert McChesney's creation of Free Press. The Free Press, along with media reform and public interest groups, are essential in the fight to democratize the media and media technologies according to McChesney (2004). McChesney (2004) claimed that in order to do so there needs to be, "widespread, informed public-participation in media policymaking... A free press doesn't just happen; it has to be built and nurtured by a free people. The survival of our democracy depends on it" (p. 11).

Nina Huntemann (1999) added to this thinking in her report documenting the commercialization and concentration of the radio industry. She called for a media system

that works for the public interest and ensures equal access, and diversity. Huntemann examined corporate consolidation in radio by examining the issue through the perspective of feminist PEC. Micky Lee (2011) also championed for a feminist approach to PEC in order to promote diversity in spite of laws indifferent towards, if not encouraging of, oligopolies and the exploitation of minority men and women as “Third World subjects” (p. 84). Huntemann (1999) called upon Chomsky and Herman to detail the dangers of corporate ownership and political policy for consolidation in arguing that information is often censored for fear that it may challenge the status-quo, or threaten corporate ownership or advertisers.

Public media are equally susceptible to self-censorship, as they must answer to corporate underwriters and government funding. Huntemann (1999) explained the homogenization of broadcast content and ownership of radio since the Telecommunications Act of 1996. Minority ownership and content has diminished as white male ownership and content has increased, which Huntemann attributed to market forces demanding increased profits at the cost of the public interest. Huntemann cited an FCC commissioned study of advertising practices on minority owned and formatted stations. The study found that said stations attract roughly two-thirds less advertising revenue than do other stations due to advertisers being reluctant to purchase time because of antiquated notions of buying habits and economics. Huntemann used this study to contest the justification for market competition and corporate controlled media. Like Mosco (2008), Huntemann (1999) warned of jobs lost due to consolidations and a political and corporate domination of the media landscape.

John McMurtry (2002) characterized the effects of corporate consolidation and

globalization in a graver tone. Taking the side with protesters of corporate globalization McMurtry stated that corporate executives are bound to maximize returns to corporate stockholders because to do otherwise would be in violation of “legally binding corporate morality for its operations to take account of the life interests of employees, surrounding communities and environments, or even the future life of the world ahead of shareholders’ continuous maximization of money profit” (p. 202). Resistance by any society or government is “denounced through state finance and trade offices and global mass media as ‘non-competitive’, ‘protectionist’, ‘monopolist’, or ‘communist’” (p. 203).

In contrast to the information presented thus far W. Lance Bennett (2004) asserted that a transnational media regime is not a detriment to the public interest, or a free democracy or media. Rather, he argued that it is advantageous in that, “it widens the analysis beyond the conventional focus on media corporations and national regulatory politics” (p. 128). While initially making a compelling case in opposition of greater media concentration Bennett took a drastic turn in favor of right-wing economic policies that promote consolidation.

Bennett defended the transnational media regime by claiming that audiences flock to the “increasingly generic programming in both entertainment and public affairs... and simpler, more entertaining images of politics” (p. 126). Implicit in his description of a transnational media regime’s mass audience is a systematic ‘dumbing down’ of society that hunger for standardized content and shun the alternative he describes as “heavily regulated, highbrow public service television systems” (p. 126). The majority of his defense of the transnational media regime, however, is in line with increased media concentration, despite the fact that it comes at the proven risk of job loss and a

homogenizing corporate influence that has shown to reduce the amount of advertising revenue for those media entities that are still owned and operated by women or minorities.

Bennett's argument does not hold up against the evidence provided previously in this chapter that corporate/political dominance of the media, by way of oligopolistic concentration, results in powerful transnational nation states that effectively homogenize the cultures of weaker nation states and widen the already substantial gaps between powers and classes. In his study of political communication effects and how the economy conditions political learnings Fei Shen (2009) added further oppositional evidence to Bennett in concluding, "When voters' interest is taken care of by the government, they delegate their political rights to the elites" (p. 389). Shen's findings are relevant to refute Bennett's position of a transnational media regime and to further demonstrate the relevancy and applicability of the PM.

### **Telecommunication Act of 1996**

The Telecommunications Act of 1996, signed into law on February 8 of that same year by Democratic President Bill Clinton, was the first legislative step towards the dense concentration of media ownership that clogs our news and broadcast outlets today. While touching on issues such as indecent and obscene material, broadcast cable, radio, telecommunications equipment and manufacturing the act is most notable for its annulment of cross-market barriers. The act put into law that one television network could own and operate stations that reached up to 35% of the nation's TV viewing residences while abolishing the limit of radio stations that same company can own.

Of all the articles regarding the 1996 Act examined in preparation of this writing

only two provided universal support of it and its effects and implications. Unsurprisingly, the authors of the two supporting articles are Jim Robbins and Brian Roberts, former President and CEO of Cox Communications, and current chairman and CEO of Comcast Corporation, respectively. Robbins (2006) spoke glowingly of the 1996 Act by first listing service problems faced by customers prior to its passage, and how they became obsolete once companies began merging. He defended telecommunication companies' need to raise subscription fees for consumers so that they could cover costs associated with programming fees. He espoused cable operators' agreements with local governments to offer public, educational, and governmental programming for the public interest. Roberts (2006), too, began his praise of the 1996 Act by recounting the 'horrors' of a pre-1996 Act world in terms of cable and phone service. Quick to mention his role as chairman of the National Cable Television Association (NCTA), he boasted of his testimony endorsing "the great potential that cable had to introduce real competition"(p. 572). He continued to tout his role in lobbying the FCC for deregulation of ownership rules so that competition could flourish and cable could prosper as the leader onto a new telecommunications frontier ripe with broadband services, home telephony, and more content than one knows what to do with. Unfortunately for Robbins and Roberts, all of their claims of 1996 Act grandeur are refuted in scholarly works put forth in the remainder of this literature review.

Gene Kimmelman, Mark Cooper, and Magda Herrera (2006) disputed claims of competition following the 1996 Act. They noted "mergers that most recently eliminated the two largest competitors of the already consolidated Bell giants" (p. 512). Kimmelman et al. (2006) provided statistics on the hike in consumer prices of cable. Considering



consumers are forced to buy bundled cable service, as opposed to an ala carte method, Kimmelman et al. (2006) calculated that the cost of the average monthly cable bill has nearly doubled, which is almost four times the rate of inflation. By comparison, prices for regulated local phone service have increased at approximately the rate of inflation (p. 515). Kimmelman et al. (2006) concluded that the pricing shown here illustrates that fewer providers, by way of deregulation, not only consolidates the market but also equates to higher subscription fees for consumers.

Susan Ness (2006), FCC commissioner from 1994 through 2001, provided an interesting rebuttal of Robbins and Roberts in her discussion of the 1996 Act. Ness wrote an impartial account absolving the FCC of responsibility in the decline of discrete long distance service, which the FCC was commonly blamed for, but also declining to take credit for a robust period of increased profits, and technological breakthroughs such as Wi-Fi, mobile phones, and other such devices (p. 532). Ness effectively discredited Roberts' (2006) assertion that the 1996 Act was responsible for an influx of new communication technologies, which he used to build his case for even further deregulation. Further discrediting Roberts' claims, Ness lamented the unintentional effect of the 1996 Act that led to a drastic consolidation of radio, operatively gutting it of its localism. She warned that deregulation only works when accompanied by competition because otherwise the risk is far too great of having a deregulated monopoly provider (p. 533).

The public interest is often a prominent topic in discussions of media mergers and legislation, and the 1996 Act is no different. Angela Campbell (2006) argued that the public interest was much less a priority for regulators and corporate ownership than it

should have been considering the substantial amount of attention it receives from media watchdog groups and the public. While Campbell highlighted a number of negative effects on ownership and competition resulting from the 1996 Act, she focused on the public interest in terms of the transition from analog to digital and broadcasters' ability to circumvent the public interest requirement loosely imposed by the FCC. As of Campbell's writing, the FCC had failed to take any action regarding the transition and public interest despite Advisory Committee recommendations dating back to 1999.

Also focused on the public interest aspect of 1996 Act implications is Steven Barnett (2009), who took an innovative approach, even at the risk of doing so with a defeated tone. Barnett acquiesced to the notion that media consolidation is here to stay and there is little chance of turning back despite the drawbacks of concentration that he detailed and the ones mentioned in this review thus far. Rather than fight against the invincible opponents that are the tag team of the private and political sectors, Barnett called for finding a way to protect journalistic diversity and the public interest. He did so by examining legislation and the state of media affairs in Britain.

In short, Barnett (2009) asserted that a media entity that is commercially funded yet owned by the public is one that would serve the public's interest best while still allowing for corporate profitability. The point that Barnett made, and which is in line with Campbell's (2006) claims, is that the public interest has been pushed to the back of media discourse for too long and needs to be reinstated at the forefront of legislation. If dominant elites, that is to say corporate executives and government officials, are going to wield their power and influence to maximize their own profits in spite of protests rallying against corporate consolidation then the least that can be done is to maintain a

commitment to the public interest.

Aside from the effects and implications of the 1996 Act already stated in this review, John Allen Hendricks (1999) made an interesting point in his analysis of the Act's impact on the media. He noted that deregulation is rooted in the ideological grounds that government should have a minimal say in Americans' everyday lives. As such, deregulation puts the free marketplace in the position to regulate industries (p. 46). Hendricks' observation makes it clear how and why the PM, PEC, and cultural studies are relevant in their application to the issue of corporate and political collusion in creating an oligopolistic corporate-controlled media.

### **Rationale**

The propaganda model, with the help of the political economy of communication, is a strong and relevant theoretical framework to use for investigating the issue of media consolidation and the complicit relations between corporate and political sectors that enable and encourage it. The literature reviewed concerning the propaganda model was conclusive that it is applicable to a wide assortment of issues regarding the media as well as class relations and power. It is true that the model and its five filters are not all applicable in all cases; however, it is proven that the model is a critical tool to assess not just media behavior, but also the underlying issues of power, class struggle, and capitalism. In similar fashion, the political economy of communication is equally as useful to understand when investigating media consolidation because of the breadth of analysis it encapsulates of economies of scale, labor forces, class struggles, and the effects and implications of global consolidation resulting in the emergence of powerful transcultural nation states.

Considering the literature reviewed on the Telecommunications Act of 1996 that detailed the decline in media ownership and competition, spike in prices for consumers, loss of jobs, and decreased importance placed on the public interest by corporate and political officials, it is clear to see why the Comcast and NBC merger must be investigated using the Propaganda Model as the theoretical framework. Examined as the case study for this thesis, the Comcast and NBC merger is the most significant merger to date in terms of content, power, consumer reach, and money. The avoidance of the Propaganda Model, the political economy of communication, or any of the documented effects and implications that resulted from the 1996 Act would do an injustice to scholarly work in the field of media consolidation, and would further marginalize the public interest. The following research questions must be addressed in order to fully understand the issue of corporate and political collusion in creating an oligopolistic corporate-controlled media.

### **Research Questions**

RQ 1: In what ways, if any, did Comcast act in politically and/or economically collusive ways with political officials in attempts to gain FCC approval for their buyout of NBC?

RQ 2: How is the Propaganda Model applicable in the Comcast/NBC merger?

RQ 3: Does the Comcast and NBC merger exemplify the danger to the public interest posed by government policy creating an oligopolistic corporate-controlled media? If so, then how?

### **Chapter 3. SCOPE and METHODOLOGY**

#### **Scope of the Study**

Investigating government policy, corporate control of the media, and corporate-political interaction, which this study did, necessitated a broad scope of research. A case study of the most significant media merger today was conducted to provide a current example of the collusion involved with, and effects and implications of a media merger. This thesis used the Comcast and NBC merger as a case study, and as such a content analysis of *NY Times* articles concerning the merger was included. Articles were selected from November 1, 2009 till April 5, 2011 to analyze coverage given to the merger from when Comcast's intentions to buy NBC were first announced till shortly after the FCC approved the merger. A search was done of the *NY Times*' online archive database using the search term "Comcast merger" to gather articles that were based primarily on the merger. Articles found in the database but excluded from this study were stories that merely mentioned the merger in passing, or did not provide sufficient information, context, or analysis of the merger and its implications. In all, 34 articles were included for analysis in this study.

In terms of theoretical and empirical-study documents, a vast search of texts was conducted to include theoretical considerations and reconsiderations, tests of applicability in instances other than just corporate and government controlled media, and transcultural perspectives. The reason for such a broad focus is to not only glean a comprehensive understanding, but also to invariably test the reliability and validity of the hypotheses put forth in this study. The scope of contextual data is narrower. Statistics of mass media ownership were gathered for an understanding of the changes before and after the 1996

Act. Communication journal entries from FCC chairmen and women, and analysts, and board members of media owning corporations were gathered. Furthermore, the employment backgrounds and professional associations of some of the key members of Comcast's executives were investigated, as were the intense lobbying efforts and political contributions of Comcast. Additionally, documents concerning NBC's coverage of the 2012 Olympics, Comcast's subscription rate increases, and post-merger job losses at Comcast and NBC were included to illustrate evidence of the theoretical framework used in this thesis and to refute Comcast's defense of the merger as a move that will benefit the public. Statistics and monetary figures of merger activity were also included. In all, 67 documents were selected for use.

### **Research Method**

The data gathered for this study was collected through a triangulation of methods including a content analysis of *NY Times* articles, and a case study of the Comcast and NBC merger. This study then utilized a meta-synthesis method. True to Cronin's description of the meta-synthesis method, which is a non-statistical technique to integrate, assess, and interpret data from several qualitative research studies with the goal of transforming individual studies into new ideas and interpretations, this thesis combines the findings of several qualitative research studies to evaluate and integrate the data into a systematic conceptualization of corporate-controlled media (Cronin et al., 2008). These methods were chosen because each is critical to conduct a comprehensive investigation of the collusion between corporate and political elites that has lead to an oligopolistic corporate-controlled media state.

A search of Google ([www.google.com](http://www.google.com)), the FCC's website ([www.fcc.org](http://www.fcc.org)), and Comcast's website ([www.Comcast.com](http://www.Comcast.com)) was used to gather contextual data consisting of personal information regarding work experience and professional associations of members of Comcast's executive board, Olympic coverage, subscription rate increases, job losses, and statistical information concerning media ownership and consolidation. Search terms used for gathering contextual data included "Comcast layoffs after merger", "jobs lost due to Comcast NBC merger", "Comcast price increases", "conditions imposed on Comcast merger", as well as the names of various Comcast executives with their official title following their name in the search field. Additionally, a macro evaluation of the passage of the Telecommunications Act of 1996, and the parameters set forth within the Act, was conducted to illustrate the collusion at work in creating government legislation concerning media companies. Subsequently, a meta-synthesis method was used to demonstrate the pervasive detrimental effect of powerful elites working to consolidate the media.

### **Data Analysis**

The documents analyzed in this report were chosen to display the systematic pattern of government and corporate collusion in their dominance of the mass media and, in turn, the creation of an oligopoly of media ownership. At the root of the matter is the issue of corporate and political dealings. As a result, the initial search for data began with Herman and Chomsky's Propaganda Model. The model posits that mass media interact with political and corporate institutions in such a way, namely in social circles and business practices, that the media's ability to engage in institutional analysis is profoundly restricted by these relationships (Klaehn, 2002). The data collected for this

thesis regarding the Telecommunications Act of 1996 and the case study of the Comcast and NBC merger was analyzed through the lens of the Propaganda Model due to the inherent factors at play when media companies consolidate. The Propaganda Model was used as a method for data analysis by identifying parallels between the model's filters and *NY Times* coverage of the case study merger, and by identifying collusive relations between corporate and political officials. The model's first-, second-, and third-level predictions were also considered in analyzing the case study. The research on this topic seeks to address the issue of corporate ownership and U.S. government influence on the mass media.

### **Reliability and Validity**

The reliability of the research methods used in this study is moderately strong because of easily retrievable data that is available through academic search libraries and newspaper archives. The reliability of data on Comcast executives is not as strong because of the company's ever changing website and accessibility of information on their executive board members. A variety of search methods and terms had to be utilized to acquire strong and sufficient information on the professional backgrounds of board members.

The validity of data is strong due to the comprehensive scope and analysis of theoretical and empirical works, and the evidence shown to support the propaganda model. The case study examined in this thesis provides current and relevant support of the propaganda model, as do the plethora of other examples noted in chapter 2. Furthermore, the data collected from the case study of this thesis is valid as evidenced by the sources from which the information was attained and the professional and political



relationships presented. Hence, the data and analysis put forth in this study meets the internal, external, and statistical validity of qualitative research as stated by W. Lawrence Neuman (2006).

### **Ethical Considerations**

The systematic method of research and analysis obviates the need for much ethical consideration in terms of design due to the published professional and statistical data used in this study. A meta-synthesis of such a wide scope of study subjects necessitated ethical consideration in regards to conceptualizing a logically sound argument, which this study claims to have accomplished. Another ethical consideration is the purposeful avoidance of perceived slander of the politicians and corporate executives mentioned. It was with much deliberation that only the available facts were discussed in terms of various personnel, institutions, and policies, and that no unfounded claims or accusations were directed to any person or institution.

## **Chapter 4. THE STUDY**

### **Introduction**

This thesis examined the corporate and political collusion involved in the creation of the oligopolistic mass media landscape in the United States. Using the propaganda model as the primary theoretical framework for analysis, this study investigated the powers at work regarding the Comcast buyout of NBC. With this merger serving as a case study three particular areas were examined: Comcast's lobbying efforts and political connections, coverage of the proposed and finalized merger in the *NY Times*, and direct effects of the merger on the public. In order to gain a full understanding and appreciation of the case study it is important to first detail the Telecommunications Act of 1996 because of the collusive elements associated with its passage, and the crucial role it has played in media consolidation.

### **Telecommunications Act of 1996**

The Telecommunications Act of 1996 is the single most important piece of legislature concerning media consolidation. The Act was signed into law by then President Bill Clinton, a Democrat, and augmented by then President George W. Bush, a Republican. The reason bipartisan effort in enacting the Telecommunications Act of 1996 is important to consider is because the Act was a catalyst for the glut of mergers that have created dominant and transcultural mega conglomerates, which now constipate our media environment. The Act dealt with a broad scope of issues ranging from indecent and obscene broadcast content to telecommunication manufacturing; however, its most significant outcome was the nullification of cross-market barriers for media ownership. The Act granted authority to any one-television network to own and operate stations that

reached up to 35% of the nation's TV viewing residences and abolished the limit of radio stations that same company could own. This opened the floodgates to media mergers, consolidations and vertical integrations of some of the most dominant corporations in the telecommunication industry (Schudson, 2002, pp. 249-254). Immediately, "the networks' full or partial ownership stakes in the shows they broadcast rose by two thirds from 1995 to 1998- from 28% to 46%" (Goolsbee and Gwinn, 2007, p.7). In terms of the radio industry, Clear Channel was a big time player in acquiring radio stations across the country. In 1997 Clear Channel owned 196 stations but by 2005 that number skyrocketed to 1,183 (Chipty, 2007, p. 3). However, the biggest winners resulting from the Telecommunications Act were companies that were able to combine their product with a broad range of other communicative services. For example, Time Warner purchased Turner Broadcasting System in 1996 and merged with AOL in 2000. After a number of other acquisitions, Time Warner is now ranked as the second largest entertainment, and cable-provider conglomerate in the world ([www.freepress.net](http://www.freepress.net), 2011). The largest entertainment conglomerate, Disney, acquired the rights to Capital Cities / ABC Group in 1996 and renamed it simply ABC. A year later Disney purchased the rights of the Anaheim Angels, a Major League Baseball franchise. Disney was no longer just a film studio giant. They became the owners of several TV production outlets, a major broadcast network, radio stations, theme parks, retail stores and a professional baseball team among many other assets (Think and Ask, 2004, para. 4).

However, the FCC deemed that this was not enough for big business and on June 2, 2003, the commission voted to relax broadcast ownership limits even further than had been established by the 1996 Telecommunications Act. The FCC voted to increase a

network's broadcast service cap to 45%, much to the alarm of media watchdog and special interest groups, some politicians, and the American public. This allowed for cross-media ownership in the same market, meaning newspapers and radio and television broadcasters could work together as a single entity in the same market. "These new rules would permit one company in one city to own three television stations, eight radio stations, the daily newspaper and the cable system" (Scott, 2004, p. 646). In his essay, *The Politics and Policy of Media Ownership*, Scott (2004) goes on to succinctly and systematically detail the 2003 vote by the FCC, the subsequent fervor that it caused and the back-door compromise that undermined the opposing majority's wants and efforts.

In summary of such, the Republican administration of President George W. Bush had sought to quickly dismantle government controls in the media marketplace and, with Michael Powell as the Republican head of the FCC, it was in prime position to do so. Other factors leading to this decision were, as a result of the Telecommunications Act of 1996, the drastic decline in local radio programming due to the high concentration of radio ownership, and a number of highly esteemed journalists bellowing the degradation of quality of both American news media and public debate. Combine this with the onset of the Iraq war in 2003 and all systems were a go for the accelerated deregulation of media ownership. However, the FCC's ruling met with stiff resistance from the likes of Consumers Union, Center for Digital Democracy, Consumer Federation of America, Parents Television Council, the National Council of Churches and the National Rifle Association. Also joining in opposition were a Congressional majority, the 750, 000 notices of disapproval from the American public and the National Association of Broadcasters (though they did reverse their stance several times on a number of issues

involved with the ruling). The Congressional majority that opposed the ruling was a bipartisan effort that held highly publicized hearings across the country to raise awareness of the issue. In November of 2003, with the courts ready to rollback the FCC's decision, a closed-door compromise was reached between FCC supporter Senator Ted Stevens and White House counsel. This compromise, reached during the eleventh hour before said rollback was to have been declared, set forth the following parameters: a permanent broadcast cap set at 39%, the FCC's biennial review extended to quadrennial, any company violating the 39% limit has up to two years to sell stations as opposed to the previous six to twelve months and, lastly, the FCC's authority to grant waivers for the broadcast cap was not explicitly abolished.

In other words, this compromise flew in the face of an overwhelming majority, increased the broadcast ownership cap while decreasing enforcement of its rule and clouded knowledge as to who in fact was responsible for granting waivers to stations who could exceed the cap. Henceforth, the chart labeled Top Media Companies in the appendix exemplifies the resulting coagulation of media ownership as it stands presently. In short, there is an alarming trend of five of the big six media conglomerates, Time Warner, CBS, Disney, Comcast and News Corp, spanning the tops of the rankings for top newspaper, online news, TV network, cable news, local TV, magazine, and radio companies. Viacom, the sixth of the big media conglomerates, is not at the top of any of the charts presented in the appendix; however, it owns and operates a large portion of the stations and film companies that contribute to the content of other conglomerates. Additionally, while not in the top rankings of magazine and newspaper ownerships News Corp owns all of HarperCollins Publishing companies, four newspapers in the United

States, two newspapers in the United Kingdom and one newspapers in New Guinea, as well as the *Wall Street Journal* in the U.S. and editions for Europe and Asia. Not to be outdone, Time Warner owns all Time Life Book companies, Turner Broadcasting System and its CNN networks, Home Box Office (HBO), Warner Bros. Entertainment, Time Inc., and a host of other companies. Furthermore, Disney works in partnership with Hearst Corporation, the third ranked magazine company, and with GE in broadcast and cable television station investments (Columbia Journalism Review, 2011). The list of partnerships and ownerships can go on and on but this should suffice as adequate evidence of the congestion of cross-media ownership.

The following statistics serve as evidence of the cataclysmic decline in diversity of radio and television stations, and of newspaper owners and publications. Duwadi, Roberts and Wise (2007) found that during 2002 to 2005 the number of co-owned TV and radio stations grew by more than 20%. Furthermore, the number of radio stations nationwide increased moderately as the number of owners decreased by 5%. Subsequently, the percentage of locally owned stations dipped 3.7%. This is proof of a shifting towards an oligopoly ownership of radio, especially when considering the statistics mentioned previously regarding the drastic increase of control Clear Channel has on radio throughout the country. In the top ten U.S. radio markets Clear Channel owns five stations in New York City, eight in Los Angeles, seven in Chicago, seven in San Francisco, six in Dallas, six in Houston, six in Atlanta, six in Philadelphia, nine in Washington DC and five in Boston (ClearChannel.com, 2012). During this time the number of daily newspapers decreased slightly with locally owned papers decreasing 5%. The number of newspaper owners decreased about 8%. The numbers are strikingly

similar for the TV industry as they are for the radio and newspaper industries. During the same four-year span commercial and non-commercial stations saw a 1.4% increase while the number of commercial owners decreased by approximately 4%. The number of non-commercial public stations remained static. Duwadi et al. (2007) calculate that the overall decrease of ownership, after factoring in the relatively stable non-commercial sector, was about 2%. Despite these statistics the number of locally owned stations increased about 3%. The actual figures of said statistics appear in the chart below.

**Table 5: MASTER SUMMARY TABLE** (Duwadi et al., 2007)

	2002	2003	2004	2005
Television Stations	1,739	1,745	1,750	1,764
Unique Television Station Owners	491	492	479	480
Locally-Owned TV Stations	427	431	432	439
Minority-Owned TV Stations	20	16	17	17
Minority-Owned TV Stations Adjusted*	20	15	15	16
Female-Owned TV Stations	26	26	27	26
Female-Owned TV Stations Adjusted*	25	26	27	26
TV Stations with Same DMA Radio Cross Ownership	273	274	316	333
TV-Newspaper Same City Cross Ownership	30	30	30	30
Radio Stations	13,263	13,360	13,475	13,590
Unique Radio Station Owners	4,633	4,567	4,488	4,412
Locally-Owned Radio Stations	6,746	6,632	6,524	6,498
Minority-Owned Radio Stations	376	390	371	378
Minority-Owned Radio Stations Adjusted*	358	371	350	355
Female-Owned Radio Stations	404	377	387	376
Female-Owned Radio Stations Adjusted*	401	372	383	370
Radio-Newspaper Same City Cross Ownership	54	54	54	54
Radio Stations with Same DMA TV Cross Ownership	656	647	727	782
Newspapers	1,449	1,449	1,447	1,445
Newspaper Unique Owners	422	415	403	389
Locally-Owned Newspapers	469	467	458	444
Cable Systems	9,680	8,796	8,045	7,779
Cable Owners	3,583	3,431	3,307	3,291
Locally-Owned Cable Systems	2,699	2,406	2,538	2,485
Average Cable Penetration by DMA	58.0%	58.2%	56.4%	55.9%
Average DBS Penetration by DMA	20.5%	22.1%	24.6%	24.6%
Average Internet Penetration by DMA	N/A	50.4%	52.8%	54.3%
Average Broadband Penetration by DMA	12.2%	19.2%	25.3%	31.4%

The government's role in the creation of an oligopolistic media environment, regardless of the harm to the public interest, is clear by the legislation passed, and back-door compromises reached despite majority opposition.

## **The Results**

### **Lobbying and Political Connections**

A look into the political contributions of the Comcast Corporation in 2010 –plans to buyout NBC were first made public in November of 2009 – revealed that the company gave a total of \$3,493,454 to the election campaigns of politicians. That sum was divided \$2,116,692 to democrats and \$1,358,988 to republicans. Comcast affiliates gave an additional total of \$94,050 to political campaigns with \$53,250 going to democrats and \$40,800 to republicans. In terms of actual 'lobbying' dollars spent in 2010 the Comcast Corporation spent \$12,937,000 towards said efforts ([www.opensecrets.org](http://www.opensecrets.org), 2012).

On January 5, 2011 a letter (labeled Letter to FCC in the Appendix) from Congressmen Charles W. Dent and Michael Doyle was sent to FCC chairman Julius Genachowski and copied to FCC commissioners Michael J. Copps, Robert M. McDowell, Mignon Clyburn, and Meredith Attwell Baker (Intellectual Property Watch, 2011). The letter urged the FCC to expeditiously approve the Comcast and NBC merger citing "the joint venture will promote competition, investment, localism, diversity and innovation, and is in the public interest" (Intellectual Property Watch, 2011). The website on which this letter was found reported that the letter was signed by 97 members of the U.S. House of Representatives; however, the author of this thesis tallied the number himself and found that in all, including Dent and Doyle, there were 103 signatures on the letter and a typed listing of the names of 98 members of the U.S. House of



Representatives in support (Perhaps the miscalculation was merely a typing error on the part of the website's editors. For the sake of this study the number that will be used in discussion is 98 because many of the signatures are illegible and the typed listing provides an efficient and legible reference. All statistics included in this thesis have been rechecked and cross-referenced for accuracy). Not surprisingly, 91 of the members that signed the letter received financial support for their respective election campaigns from Comcast in 2010. The following statistics on political contributions were found on [opensecrets.org](http://opensecrets.org), the site of The Center for Responsive Politics, "the nations premiere research group tracking money in U.S. politics" (2012). The center is an independent, nonpartisan and non-profit organization.

A total of \$628,734 was contributed to the 91 signing members' campaigns, of which \$281,684 went to democrats and \$347,050 went to republicans. Of the seven members that did not receive financial support four were democrats – one of whom is a representative of Puerto Rico, and another is a representative of the Northern Mariana Islands - and three were republicans. Thus, Comcast averaged a contribution of \$6,401.90 per democrat and \$7,384.04 per republican. Furthermore, 18 of the members that signed the letter represent the commonwealth of Pennsylvania where Comcast is headquartered. All but one of the PA members received support from Comcast. The remaining 17 averaged \$11,985.29 of support from Comcast. Each of the six PA Democrats that signed the letter and received support got an average of \$17,641.66 while the 11 PA republicans averaged \$8,900 of financial support. In total, Comcast contributed \$203,750 to PA members, which is almost a third of the total amount they contributed to the 74 other signing members that received money. On average, PA democrats received almost three

times the amount of financial support than democrats in other states and PA republicans received a little over \$1,500 more than republicans in other states.

A look into the professional backgrounds of Comcast's corporate executives revealed strong relationships with many political officials. Comcast listed 36 corporate executives on their website (Comcast Corporate Executives, 2012). It was found that 10 executives have pronounced political affiliations, serve on the board of the NCTA, or had worked in a prominent position with a company previously that had collusive relations with political officials. A detailed list of the executives found with said affiliations is included in the Appendix and labeled Comcast Executives. The information was found by reading the executives' professional biographies as provided by Comcast and/or a simple Google search of the individual's name with "Comcast" following. Further research was conducted into the political affiliations of companies where Comcast executives found to have potential affiliations previously worked.

Some examples of collusive relationships and dealings with political figures, which supported RQ1, are Karen Dougherty Buchholz, Melissa Maxfield, Kyle McSarrow, and David Cohen's time served as appointees and/or employees of various politicians' campaigns and staffs. McSarrow, in particular, was a Republican nominee for Virginia's 8<sup>th</sup> Congressional District in 1992 and 1994. Another example found was that of Joseph McGinley who served as Vice President of investment firm Cerberus Capital Management from 2002-2005. During his time as Vice President, Cerberus was involved in scandals concerning the privatization of VA hospitals, mismanaging funds for various military corps, and was also a leading contributor to political campaigns for

Democratic Senator Joseph Lieberman, and Republican Congressman Jerry Lewis (Democratic Underground, 2012).

While not listed on Comcast's executive list it is important to note Comcast's hiring of Meredith Attwell Baker in their Washington, D.C. lobbying office (Comcast Press Release, 2011). Baker was one of the FCC commissioners that approved the merger of Comcast and NBC (Flint, 2011). She went a step further and co-authored a letter with commissioner Robert McDowell suggesting that too many conditions were placed on the merger and that she feared the conditions would stymie competition and innovation. (Baker and McDowell's letter, and a list of the merger's conditions are included in the appendix and labeled Baker Letter and Conditions, respectively) It was announced in May 2011, just four months after the merger was approved, that she would join Comcast as senior vice president for government affairs for NBC Universal. As part of an ethics pledge Baker signed for the Obama administration she is not permitted to lobby anyone at the FCC for two years after her departure, or lobby political appointees at the FCC for the remainder of the time that Obama is President. In addition, Baker can never lobby any executive branch agency concerning an agreement made between Comcast and the FCC on merger conditions. Baker can, however, lobby members of Congress immediately (Wyatt, 2011).

Thus, the findings represent distinct powerful and reciprocally influential and collusive relationships between Comcast corporate executives and political officials. These results support RQ1 in terms of politically and economically collusive ways in which the corporate and political sectors interact and reinforce one another's interests.

***N.Y. Times Coverage of Merger***

A search of the *NY Times* online archival database for articles concerned with the merger of Comcast and NBC turned up 34 relevant documents. They were coded by date, author, sources used, and overall support or opposition to the merger. Support and opposition were categorized as pro-merger, slightly pro-merger, neutral, slightly anti-merger, and anti-merger. Determinants for support and opposition variants were types of sources used, where in the article sources were used, bias of sources, degree to which the actions and motives of Comcast were promoted or discouraged. For example, an article categorized as pro-merger utilized primarily official sources throughout the article and/or to refute any oppositional voices while exalting Comcast. Conversely, an anti-merger article utilized sources other than just official sources, described potential risks to the public as a result of the merger, or called upon groups, politicians, or public to fight the merger's approval. A writer's bias was clear in articles categorized pro or anti-merger. The same determinants were used for slightly pro- and anti-merger articles, although the bias was more tacit than unequivocally expressed. Articles categorized as neutral did not exhibit any explicit bias, rather they expressed equal regard to both pro- and anti-merger sentiment and/or they primarily offered contextual information such as results of previous media mergers or managerial changes. It was found that the date of publication did not provide much useful information from which to infer predicted coverage patterns aside from two instances in which the authors reversed their anti-merger tone to assume a decidedly more pro-merger tone. The documents selected spanned eight writers and the anonymous editors of The Opinion Pages section. In all, three documents from The Opinion Pages were found to be relevant. Of the eight writers of the remaining

documents one is a financial columnist, one a legal profession and white-collar crime reporter, one is a media business reporter, one is a business reporter, and four are contributors to the Media Decoder column of the *NY Times*' Media and Advertising section. The *Times* (2012) describes the column in the following:

Media Decoder is an insider's guide to the media industry that tracks the transformation of the movie business, television, print, advertising, marketing and new media. It's a showcase for the extensive media coverage throughout The New York Times and a window on how the business of connecting with consumers is changing in the digital age. (Media Decoder, 2012)

### **Pro-Merger**

It was found that 20 of the 34 total articles were consistent with a pro-merger bias that served to support Comcast's efforts to buyout NBC. There were a total of 13 articles of pro-merger support and seven of slightly pro-merger support. Of the 20 total articles that were pro-merger, 13 were from contributors to the Media Decoder column.

Aside from two articles of anti-merger sentiment from The Opinion Pages, all of the articles used official sources from government, Comcast, NBC, or corporations that stood to benefit from the merger. Articles categorized as pro-merger used official sources much more regularly than did articles that were categorized as neutral or anti-merger. Interestingly, however, pro-merger articles also used non-official sources such as media watchdog and advocacy group representatives significantly more than did the neutral or anti-merger articles. Despite this finding, however, it was shown in pro-merger articles that dissenting voices were marginalized in the reporting and/or sandwiched in between official sources that espoused the benefits of the merger (Arango, 2009a, 2009b; Carter,

2010b; Sorkin, 2009a, 2009b; Sorkin, 2010a; Sorkin & Merced, 2009; Stelter, 2009b, 2009c, 2009e; Stelter, 2010e; Stelter, 2011; Stelter & Carter, 2010;). Thus, it could be argued that the reader would be left with the impression that the merger could or would be beneficial to the consumer and the media landscape. Adding to this impression were five articles that were categorized as ‘fluff’ pieces. Some of these articles focused solely on praising the accomplishments and careers of Comcast’s Brian Roberts (Stelter & Arango, 2009) and Stephen Burke (Stelter, 2009a), and GE’s Jeff Immelt (Editorial, 2009a), while others discussed how popular NBC comedic sitcom *30 Rock* creatively used the merger in the plot of an episode (Egner, 2009), and how popular late-night host Conan O’Brien jokingly praised Comcast as being his “new potential boss”, and which the author said of Comcast, “the future owner of NBC Universal” (Stelter, 2009f).

### **Anti-Merger**

The remaining articles were found to be either neutral (a total of five) or anti-merger (a total of nine). Only four articles offered immitigable support of anti-merger sentiment. The Opinion Pages provided two of those articles (Editorial, 2009b; Editorial, 2010). Although no official sources were referenced, the Opinion Pages’ articles did illustrate the concerns shared by media watchdog groups and politicians opposing the merger, and advocated for the FCC to impose conditions if the merger was approved. Media Decoder contributor Michael Ciepley (2010) provided another anti-merger article that highlighted the concerns of, and harm to minority groups in regards to the Comcast and NBC merger, and other major media mergers before it. The other article selected that offered immitigable support of anti-merger sentiment came from Media Decoder contributor Bill Carter (2010c) in which he used official sources in opposition to the

merger such as Independent VT Senator Bernie Sanders and anonymous NBC executives. Surprisingly, however, Carter (2010a) then wrote and published a pro-merger article the next day refuting all anti-merger arguments made by the sources he used in his previous article by then using official Comcast source Sena Fitzmaurice. In the corporate executive information included in the appendix Fitzmaurice is shown to have significant political affiliations.

In somewhat similar fashion, an article categorized as slightly anti-merger quoted Susan Crawford, the author of *The Big Squeeze: The Crisis in American Communications*, a book about media oligopolies and policies, as being in stark opposition to the lobbying efforts and financial contributions of Comcast in buying approval for their merger with NBC.

It's a big expensive example of machine politics. You hire all the lobbyists and lawyers in town; you hand out contributions to every politician you can think of; you buy the affections of every group that might complain about the merger, and you strike fear in the hearts of anyone who will need to do business with you in the future. It's about as subtle as a wet fish in the face. (Stelter & Arango, 2010)

However, a pro-merger article written in January of 2011 by Brian Stelter and Tim Arango, the two writers of the aforementioned article, and then assisted by Bill Carter for the January column, quoted Crawford again although this time in a less anti-merger fashion. The quote was utilized in regards to FCC imposed conditions on the merger that paint Comcast and the merger in a favorable light in terms of being pro-competition and innovation, "This is the latest intervention to provide daylight – just to open up enough

daylight to give this nascent online marketplace a chance to take off” (Stelter et, al. 2011).

There were four other articles categorized as anti-merger whose sentiments were mitigated by a general praising of Comcast as a whole (Sorkin, 2010b, 2010c), by a glut of sources that wished to not be identified because of their opposition (Stelter, 2010c), and by a deflection of attention onto a campaign promise of President Obama in which he “called for closer inspection of media mergers” to put an end to Bush-era media consolidation (Stelter, 2009d). It can be argued that the influence these mitigating factors had on the overall perceived sentiment was one that deflected attention off of Comcast and the danger to the public interest that major media consolidation pose, and instead onto extraneous issues and qualified opinion on the part of democratized media opponents hiding behind anonymity.

### **Neutral**

The articles categorized as neutral varied in focus from a detailing of the financial holdings and interests at stake in the proposed merger (2009a, 2009b, 2010a; Sorkin & Merced, 2009), changes in management at Comcast and NBC (Lattman, 2010), flak for Comcast over net neutrality issues (Stelter, 2010d), framing of political debate over the merger (Stelter, 2010a, 2010b), to a listing of previous mega-media consolidations (Protest, 2011). Protest’s article listing previous mergers detailed anti-trust fights concerning relatively recent mergers, all of which were opposed by the public and/or watchdog organizations. Despite strong opposition, each merger was approved and ultimately failed outright or failed to live up to lofty expectations.



In total, of the 34 articles selected for inclusion in this study 20 offered varying degrees of support for a pro-merger bias (58%), five offered a neutral stance (14%), and nine offered varying degrees of support for an anti-merger bias (26%). Now that Comcast's lobbying efforts and political contributions for merger support, and the *NY Times'* coverage of the merger have been examined, the effect on consumers in terms of cost must now be discussed.

### **Rate Hikes for Consumers**

A Google ([www.google.com](http://www.google.com)) search of "Comcast price increases" netted 14 articles that evidenced a greater-than-inflation increase in cable prices for consumers across much of Comcast's coverage area in the U.S. Comcast's service area includes 43 states and the District of Columbia (Comcast Special, 2012).

According to Dan Nephin (2012) Comcast will raise its cable services fees nationwide for consumers 3.8% on average, which is the second increase in the past year. Daniel Cohen (2011) reported that Comcast used to raise their fees 1.5% on average annually; however, that percentage has grown substantially thanks to the Telecommunications Act of 1996 stripping the FCC of their authority to review cable rates. Thus, the FCC was powerless to impose a condition on the Comcast and NBC merger concerning rates.

Consumer fears of having no alternate choices for cable service readily available, and out of control rate increases for Comcast's services were found reported in Atlanta, GA (Kass, 2012), Boston, MA and surrounding New England areas (Denison, 2012), California (Hart, Steve, 2012), Delaware (Comcast Forums, 2012), Illinois (Des Garennes, 2011), Minnesota (Chapman, 2011), New Jersey (Bode, 2011), New York

(Cohen, 2011), Oregon (Rogoway, 2012), Pennsylvania (Nepkin, 2012), and Washington (Oliver, 2012). James Haggerty (2012) reported on rate increases in the Scranton, PA area, a suburban area just north of Comcast's headquarters in Philadelphia. He found that before the 3.8% nationwide rate increase was announced Comcast instituted a local increase in August of 2011 "when local fees increased from 4.5 percent to 11 percent" (2012, para. 3). Haggerty (2012) cited Comcast spokesman Robert Grove who justified the increase by stating that despite Comcast's efforts to keep costs low for consumers higher programming costs and operating expenses necessitated the fee increase. Haggerty, like the articles from other cities and states referenced above, voiced concerns of Scranton residents that competition is not always readily available in suburban and mountain markets like theirs.

In his column, Mike Rogoway (2012) stated that competition from Verizon Fios TV is waning in Oregon and southwest Washington due to Comcast's increasing strength and presence in the area. As a result, Rogoway (2012) echoed Nepkin (2012) and Haggerty (2012) in reporting of a 3.8% rate increase for cable service, although he adds that "Comcast plans a substantially higher price hike for internet service, which hadn't had any rate hikes for several years until 2011", which coincidentally is when the Comcast and NBC merger was approved. Christine Des Garennes (2011) cited Comcast's buyout of the Insight cable franchise in East Central Illinois as a significant factor in the lack of alternate cable choices for consumers i.e. little to no competition.

Phillip Dampier (2012) added a touch of controversy to Comcast's rate increases in reporting on the Regulatory Recovery Fee the FCC allows companies to charge consumers. Telecommunication providers are legally allowed to pass the fee on to

consumers in order to recover costs associated with governmental programs. The controversy lies in the fact that Comcast had been paying this fee for decades when the fee was included in the set price for service. However, Comcast is now adding this fee as a surcharge to consumers' bills and pocketing the money. Dampier stressed that Comcast is only imposing this fee on their phone service; although it's possible the fee will be charged for other services. Like their phone service, Comcast used NBC's coverage of the 2012 Olympics as a way to try to force consumers to pay for something they either hadn't had to pay for in the past or to pay more than they had to previously.

### **NBC's 2012 Olympic Coverage**

NBC offered fans the chance to stream live action of the 2012 Olympics to their home computer, tablet or Smartphone. That is, however, if you had a cable package that included MSNBC and CNBC. The official NBC Olympics website states one can stream live action on a device "with a cable, satellite or Telco TV subscription that includes MSNBC and CNBC, you can access live streams of EVERY Olympic event at no additional charge" (NBC Olympics, 2012). It was not necessary to have Comcast cable service, but it was necessary to have a cable service package that included the two aforementioned NBC stations.

Heather Kelly (2012) reported that in many areas, depending upon the cable service provider, MSNBC and CNBC were not offered on basic cable. As a result, many consumers would need not only a cable subscription to watch live Olympic action but also a more expensive package. Cox Communications, the fifth largest multichannel video programming distributor in the U.S. according to the National Cable and Telecommunications Association (NCTA, 2012), stated on their website that "to view

NBC Olympics online, on wireless devices, and on Cox on DEMAND, customers must subscribe CNBC and MSNBC via Cox TV Essential Package or higher” (Cox Support, 2012). Said package is currently listed at \$64.29 a month (Cox Residential, 2012). The only other viable option was to watch edited and tape-delayed coverage on NBC and scattered on its other channels, or to watch uploaded clips to NBC’s website or YouTube.

According to a study by Harris Interactive (Kelly, 2012), 40% of people planned to watch the games on more than one device. It was not reported how many of those people had a cable package that included MSNBC and CNBC that enabled them to do so. Despite NBC Universal owning and operating 10 television networks (NBC, 2012), NBC opted for this coverage plan as opposed to the one that the United Kingdom’s public service broadcasting corporation, the BBC, utilized. In stark contrast to NBC’s coverage plan, the BBC offered free live viewing of the Olympics over two channels (BBC One and BBC Three) and 24 online streams (World TV PC, 2012). The BBC used their BBC Two channel for regular programming for those not interested in Olympic coverage. With cable rates soaring and once free network-broadcast content subjected to what equated to access fees for many, it is clear that the Comcast and NBC merger has had a significant impact on the consumer and public interest. A closer look into post-merger effects shows that the merger also negatively impacted Comcast and NBC Universal employees.

### **Job Losses**

After talking with Comcast’s Executive Vice President David Cohen shortly after the Comcast and NBC merger was approved Laura Goldman (2011) of [businessinsider.com](http://businessinsider.com) suggested that the city of Philadelphia would not stand to lose any jobs as a result of the merger. Cohen stated, “maybe, a few additional administrative

positions might be needed locally” (Goldman, 2011). Comcast’s Brian Roberts backed Cohen in saying “there will be no massive layoffs (Reagan, 2011). While Philadelphia was not found to have gained or lost jobs as a result of the merger the same cannot be said for employees elsewhere.

Due to the consolidation and out-of-state transfer of technical operations about 100 employees in the Denver, CO area were laid off in March of 2011 (Clark, 2011). It was also found that Comcast plans to close its call centers in California by November 30 2012, which will result in the layoffs of 1,000 people (Donohue, 2012a). Additionally, Comcast plans to cut a total of 368 jobs in Illinois, although the company is trying to mitigate the layoff news by claiming the cuts will provide 350 jobs for departments supporting business customers (Donohue, 2012b).

Later in her article Goldman named Jeff Zucker (former CEO of NBC), Keith Olbermann (former MSNBC anchor), and Angela Bromsted (programming executive) as being victims of post-merger job cutting. Additional victims of post-merger job cuts included “roughly two dozen ‘*Tonight Show*’ employees – nearly 10 percent of the staff” (Izzo, 2012). According to Dan Hart (2012) “*Tonight Show*” host Jay Leno and members of his show’s staff were forced to take pay cuts to accommodate a shrinking budget due to the merger. Although Leno was forced to take a nearly 20% pay cut he offered up to an additional 30% of his salary to help alleviate some of the financial burden lesser paid members of his staff would have to endure with a reduced salary (Jacobson, 2012).

### **Support for the Propaganda Model**

The results presented thus far are not stand-alone data. Rather, they provide tangible answers to the research questions proposed earlier in this thesis. A thorough and

systematic analysis of the data provides support for the propaganda model in light of this study's focus.

*RQ 1: In what ways, if any, did Comcast act in politically and/or economically collusive ways with political officials in attempts to gain FCC approval for their buyout of NBC?*

Despite what Comcast Vice President of Government Communications Sena Fitzmaurice said about Comcast's actions in gaining FCC approval of their merger with NBC that, "this is common, proper, and expected in a transaction of this type... at every step of the way, this process has been supervised by counsel to ensure faithful adherence to the rules, and that will continue", unscrupulous behavior was evident in the analysis of the case study of this thesis (Carter, 2010a). By contributing significantly greater funds to Pennsylvania members of the House of Representatives who signed a letter urging the FCC to swiftly approve the merger than it did to members from other states, whose favor was seemingly bought at discounted rates, Comcast indisputably demonstrated complicit behavior in 'buying' favor and support from political figures in the state in which the company is headquartered. It can only be inferred that by gaining such support from their home state Comcast sought to parlay the potential economic benefits on a local level that Pennsylvania members would surely proclaim as being a result of the merger into that of support and potential benefit on a national level.

Considering the media watchdog groups, minority (yet still sizable number) of political officials, numerous media and telecommunications companies and stations, and the public's opposition to the merger the Commission's approval can be chalked up to bribery and nepotism. True to Crawford's (Stelter & Arango, 2010) analysis that Comcast hired every lawyer and lobbyist possible, and bought the affections of groups with

political sway, it is this author's argument that Comcast marched forward to the corporate-political sphere with a cavalry of influential executives ripe with political and legal-counsel connections that ascertained approval of the merger long before the official announcement indicating such. It can be argued that, all things considered, approval was a foregone conclusion and the lengthy FCC review was merely political theater, especially when considering that one of the commissioners is now employed by Comcast, and the review, on a whole, received only one singular vote of disapproval.

Defense of this author's potentially controversial statement that the lengthy review process was arguably nothing more than political theater and that approval of the merger was a foregone conclusion can best be supported by the laughable justification by Assistant Attorney General Christine Varney's statement regarding FCC imposed conditions, "the conditions imposed will maintain an open and fair marketplace" (Hamill, 2011). In light of the congested media landscape prior to the Comcast and NBC merger it is indefensible to claim any conditions on the now largest merger ever approved will "maintain an open and fair marketplace" when such a market didn't exist prior to the merger. Consider FCC commissioner Michael Copps (Hamill, 2011), the lone voice of disapproval in the review process, and Senator Al Franken's (Stelter, 2010a) position that there is reason for concern when so few companies control so much of the media, and in the Comcast case one company controlling the production and distribution, that the result will be higher costs and limited choices for consumers.

As Proress (2011) illustrated in his article reviewing recent mergers that caused controversy in Washington, media consolidations since 1997 have been largely unsuccessful despite claims to the contrary by the companies involved in said

consolidations. Thus, it is this author's belief that with knowledge of recent media consolidations' lack of success the only course by which political approval could be won is through complicit relations between corporate and political elites in the form of bribery and nepotism. The hiring of former FCC commissioner Meredith Attwell Baker is evidence of this - although an explicit examination of her hiring is not conducted in this thesis - as is the hiring of Rebecca Arbogast. It is mentioned in the Appendix document detailing Comcast executives' political affiliations that Arbogast was the managing director at the financial services company, Stifel Nicolaus, that prepared an analysis of the merger for Comcast and NBC.

A strong argument inferred from the data is that political theater was the culprit in explaining the lengthy review process. This is so because a perceived thorough analysis of the merger resulting in a decision that the public interest and media environment stood to benefit from approval of the merger would silence opposition and suppress social upheaval. The lengthy review process is not unlike the 11<sup>th</sup> hour, back-door compromise reached between Senator Ted Stevens and the Bush administration in further deregulating the ownership caps and stripping the FCC of particular authorities that were originally set forth in the initial passage of the Telecommunications Act of 1996 (Scott, 2004). Silencing opposition and suppressing social upheaval is assisted by a media state that stands to benefit from the political ties from which it is bound.

*RQ 2: How is the propaganda model applicable in the Comcast/NBC merger?*

It was found that the propaganda model is applicable in all facets of the merger that have been analyzed for this study. In terms of the model's five filters all but the advertising filter were supported, albeit in a variety of fashions. For example, the



ownership filter was supported in terms of the dominant power that Comcast wields in the media industry. Because of their ownership structure, which dates back to 1969 when the company was branded the Comcast Corporation, the company has grown into the media giant it is today by purchasing a number of smaller cable operations since its inception, figuratively swallowing the competition, and, thus dictating media behavior towards, and coverage of, the company's actions (Comcast Timeline, 2012). The statistics of *NY Times* coverage of the merger analyzed previously offered moderate support of this thinking (58% pro-merger bias, 14% neutral stance, 26% anti-merger bias); however, it is more so the content of the articles that supported it.

It was found that 32 of the 34 articles (94%) analyzed used official sources, - which is significant support of the model's sourcing filter- 5 of the articles (14%) were 'fluff' pieces that glorified Comcast executives, the company itself or focused on the witty way in which a popular NBC sitcom was incorporating the new ownership into its comedy, and another article called upon NBC legends Johnny Carson, Jack Paar, and Milton Berle to create a feeling of nostalgia and reassurance that such prominence is on the precipice for the network now that a powerful and steady leader is in control. A leader, that last article emphasized, whose network employees have no fear of losing their jobs and are welcomed with open arms from then NBC chief executive, and longest-tenured senior manager at NBC, Jeff Zucker who proclaimed, "we welcome our friends from Philadelphia" (Stelter, 2009e). The same Jeff Zucker who was let go from his position when Comcast officially took the reigns. Comcast's Stephen Burke replaced Zucker (Rice, 2010).

The model's third filter, sourcing, was supported by the high percentage (94%) of

*NY Times* articles that relied on official sourcing. Additionally, the filter was supported by the political affiliations of Comcast's executive board detailed previously. The affiliations that were examined had a unique effect on media behavior in this thesis' case study. Unique in the sense that the executives' influence in Washington and on political officials, due to their connections, helped sway political favor Comcast's way, just as Comcast's influence as a media giant helped lure a number of political officials away from their governmental jobs and into corporate positions with the company. Seemingly, it is a cyclical process. Evidence of this illustrated thus far, and advanced in greater detail in the Comcast Executives document in the Appendix, has been the examples of Rebecca Arbogast, Karen Dougherty Buchholz, Sena Fitzmaurice, Joseph McGinley, Kyle McSlarrow, Melissa Maxfield, and most recently Meredith Attwell Baker.

The flak filter was also supported in the case study of this thesis due to the evidence provided regarding sourcing and ownership. The official corporate sources that Comcast made available to the press framed quite a rosy narrative of the new media environment, Comcast's active participation in the growth and promotion of diversity, innovation, and competition, and an efficient, yet thorough, symbiotic relationship between the corporate and political sectors in seeking to enhance and benefit the public interest. Evidence of flak, sourcing, and ownership given thus far has been aplenty.

Perhaps the most egregious example was that of financial news powerhouse Bloomberg L.P.'s reversal of opinion regarding the merger. Prior to FCC approval Bloomberg L.P. was a distinct opponent of the merger, even going as far to co-sign a letter with Media Access Project and Free Press to send to the FCC urging the Commission to reject the merger bid (Gustin, 2010). However, once the merger was

approved and the FCC placed a condition disallowing Comcast to favor their own content, which means they would have to allow competitors in their neighborhooding of channels, Bloomberg immediately reversed stand and praised the FCC's ruling. Bloomberg L.P. president Dan Doctoroff stated, "strong action taken to preserve independent news programming... ensuring that independent channels are treated fairly and consumers are protected" (Stelter, 2011). Granted, Bloomberg stood to benefit from its inclusion in Comcast's 'news neighborhood' of channels, but the condition itself was merely just for show as David Cohen said himself that neighborhooding and including such news and content giants like Bloomberg would only serve to benefit Comcast in the long run because it is what consumers want (Goldman, 2011). It can be argued that the condition and Bloomberg's reversal, praising the FCC, and thus Comcast as being a conduit of diversity, localism, and innovation, was an example of flak for the staunch opposition Bloomberg and its fellow co-signers exhibited. Furthermore, it is possible that the condition was nothing more than insurance for Comcast to protect themselves from any backlash from media watchdog groups accusing them of favoring their own content and excluding outside voices because, after all, to do otherwise would be in violation of FCC rules. Considering the FCC's indolence concerning any and all rule breakers and corporate-media miscreants perhaps Comcast could have selected a more effective insurance policy to act as the face of authority for independence and free media.

Other examples of flak include NBC programs (*30 Rock*, *the Tonight Show with Conan O'Brien*, and *the Jay Leno Show*) incorporating the merger into comedic plot lines. Doing so frames the merger as a light-hearted, comedic affair with little to no serious consequences. Diminishing serious debate and discussion of the issue makes it an

afterthought, or as Roland Barthes would say a mythic, natural occurrence (as cited in Griffin, 2009, pp. 323-324). Alternate inferences can be made; however, the data suggests this formulates a foregone conclusion.

The model's fifth filter, anti-communism or anti-capitalism for this study's purposes, was supported by the pro-merger bias of *NY Times* coverage, and official Comcast sources and press releases espousing the economic benefits the merger would enable. *NY Times* financial columnist Andrew Sorkin (2009a, 2009b, 2010a; Sorkin & Merced, 2009) wrote four articles of pro-merger support, each of which boasted of the financial holdings of Comcast and NBC, the clever business dealings of Comcast throughout the years especially in bidding for NBC, and the benefit the merger would have for stockholders. No mention was given in any of those articles to the potential harm to consumers the merger posed. One would be hard pressed to make a claim of power struggle in coverage of the merger when Comcast was the only power to make headlines and stand to benefit from the merger. The pro-merger bias perpetuates the hegemony and dominant elite status of corporate officials, namely Comcast and its executives, by marginalizing dissident voices, the public interest, and those of non-elite status.

The model was supported furthermore in regards to its first-, second-, and third-level predictions. The first-level prediction that media function in such a way that systematic propaganda is utilized to maintain and promote elite interests was proven in the amount of pro-merger biased *NY Times* coverage (58% of 34 articles) as opposed to the attention given to job losses (5 articles), rate hikes for consumers (14 articles), and Olympic coverage content issues (4 articles). The investigation for documents concerned with negative consequences as a result of the merger was conducted of any and all

newspaper and online news outlets deemed applicable from a Google search.

The model's second-level prediction that discussion and evaluation of media performance will reinforce the dominant ideology was supported throughout the *NY Times* coverage in terms of the fluff articles praising Comcast, discussion of financial holdings and benefits to stockholders, the numerous examples of NBC employees excitedly awaiting Comcast's arrival, and voices of opposition deciding to remain anonymous for fear of upsetting Comcast's dominant ideology. As was described previously, when unofficial sources were used as voices of opposition they were marginalized by an overwhelming number of official sources supporting the merger in the majority of articles.

Intellectual studies that logically prove valid opposition to the dominant ideology will be condemned is the model's third-level prediction. This prediction, too, was supported, although not as strongly as the first- and second-level predictions. This is so because to date there have not been any relevant and useful academic studies done on the Comcast and NBC merger. Support for this prediction came from the singular article found that detailed the failures of the most recent media mergers (Protess, 2011). While the article itself was not condemned to this author's knowledge, it supported the prediction because no other relevant articles were found to expound on its premise despite the logical and accurate argument presented.

*RQ 3: Does the Comcast and NBC merger exemplify the danger to the public interest posed by government policy creating an oligopolistic corporate-controlled media? If so, then how?*

The information provided regarding job losses, cable rate increases, and blocked

content of Olympic coverage exemplify the harm to the public interest that the Comcast and NBC merger has caused. There is a definitive cause-and-effect relationship between approval of the merger and said effects. It is typical for layoffs to ensue when any two companies merge; however, with this knowledge one can't help but wonder why the FCC would approve a merger of this magnitude while the U.S. was in the midst of one of the worst financial recessions in its history. Job losses came despite Comcast CEO Brian Roberts' claim that there would be no massive layoffs.

Price increases for consumers are another danger to the public interest because of the already strained finances of much of America due to the recession. Increases have been shown to exceed that of inflation and, considering job losses and blocked content, one can't help but ask themselves when does the term 'value' begin to lose its meaning? Network TV, which NBC is, has always been free for consumers with a television set and an antenna. However, since Comcast took control of the distribution portion of NBC's content, once free broadcasting assumed a fee of sorts for those wanting to watch coverage of the 2012 Olympics. A subscription to a cable package that is tiered high enough to include both CNBC and MSNBC as a prerequisite for what is supposed to be free network television content equates to an additional rate hike for consumers.

## **Discussion**

The case study analyzed in this thesis, that of the Comcast and NBC merger, strongly supported the Propaganda Model as this study's theoretical foundation. In doing so, the results from the case study also illustrated both the danger and ongoing threat to the public interest in the way of trivialized corporate and political integrity, a media state that continually reinforces elite interests, increased prices for and decreased access to

content for consumers, and job losses and salary cuts. Merging two of the largest media companies into a \$30 billion giant that controls production and distribution of content has set an unnerving precedent for the media environment as a whole. An already congested media landscape has now become even narrower and the potential for corporate and political indoctrination -i.e. propagandist functionality of the media- has grown exponentially. Once again considering the support for the propaganda model, the result of such exponential growth of potential for indoctrination and reinforcement of elite interests further widens the already substantial chasm between classes in the United States, and around the world when the breadth of influence, power, and control of transcultural corporations is taken into consideration.

It was posited previously in this study that the cultural studies works of Hall, Barthes, Foucault, Marx, and the Frankfurt School theorists are essential ruminations when examining media consolidations because of the power structures inherent in corporate and political sectors, and the interactions between those sectors' elites. Typically, a powerful company owns a media outlet, which then broadcasts a message often perceived by consumers as unbiased and authoritative. However, as the propaganda model contends, and has been supported in countless studies aside from just this one, media messages are not unbiased. Rather, they are finely crafted messages that support the interests of those in power in both the corporate and political sectors. The interests of political elites are reinforced because it has been shown that political officials play an instrumental role in creating legislation that enables media companies to maximize profits, more often than not at the direct expense of the public.

In the case study of this thesis it was demonstrated that Comcast had a full arsenal

of corporate executives with very significant and powerful affiliations with the political sector. These connections played an invaluable part in the approval of Comcast's merger with NBC because the merger faced considerable opposition from media watchdog groups, the public, dissenting political officials, and companies that would be negatively impacted by the union. Furthermore, in case political connections were not enough Comcast displayed a shocking amount of disregard for public perception and corporate integrity by throwing around a copious amount of money to buy the assuredness of political favor. The end result, at least as of this writing, of Comcast's vulgar display of power has been increased cable fees and blocked network content –that is of course unless one was willing and/or able to pay for a premium cable package that included NBC owned stations- for consumers, and a significant amount of layoffs across the country of people ranging in job responsibilities from customer service representatives to production staff for one of NBC's most highly esteemed shows.

The more congested the media landscape becomes the greater risk of harm there is to the public interest. As powerful corporations grow increasingly wealthier, powerful, influential, and politically affiliated the greater risk there is to the political economy on a global scale. The risk inherent with affluent transnational media corporations is the mass homogenization of content and, thus, propagandist reinforcement of corporate and political interests serving only the dominant elites and, in turn, harming and marginalizing non-elites. One would be grossly remiss of the tangible danger and malign effects to the public to simply abridge the issue examined in this study as a case of the rich getting richer while the poor get poorer.

Consideration must be given to those without the power and affluence to have a



meaningful voice in the corporate and political spheres because it is precisely those people who stand to lose in the battle of media giants. Without an awareness of the grave consequences involved with an increasingly concentrated media environment the public (i.e. non-elites) will continue to be systematically brainwashed by the propagandist arm of the government that is the mass media and will unknowingly acquiesce to the interests of the dominant elites. Allegiance to a particular political party is nugatory because of the bipartisan effort that enacted the necessary legislation that encouraged media consolidation. Thus, this study found that corporations work to maximize profits and political entities work to maximize and maintain their control of the public. As a result, the environment is auspicious for beneficial relationships and dubious dealings between corporate and political elites to achieve their respective goals with the help of each other and at the expense of the public.

Perhaps equally alarming as the inimical effects the role an oligopolistic mass media environment has on the public interest is the latent indoctrination of the public to think the media are free, unbiased purveyors of the world around them, effectively blinding non-elites to the underlying forces, powers, and motives in control of the unending propaganda machine that is a result of the dynamic between corporate and political sectors. In defense, Chomsky (Achbar, 1992) urged that the public make themselves aware of the forces in control, and maintain an independent mind. It is suggested here that the process starts by carefully analyzing one's media exposures and the motives behind the messages put forth by mass media outlets. By understanding, or at the very least being aware of, the power structures involved with the media, its ownership, and professional and political dealings one can more properly develop a sense

of media literacy, which, on a grand scale, can be instrumental in democratizing the U.S. mainstream media.

## Chapter 5. SUMMARIES AND CONCLUSIONS

### Limitations of the Study

This study analyzed media coverage of the Comcast and NBC merger by searching for and examining articles found only in the *NY Times*. While the *Times* is ranked the third top newspaper in the U.S. in terms of circulation behind only *The Wall Street Journal* and *USA Today* (Newspapers, 2012; Refdesk, 2012; Lulofs, 2012) it is possible that other newspapers, local and/or national, could have given more fair coverage to the merger. Additionally, for the purposes of this study, only articles that were published between November 1, 2009 and April 5, 2011 were examined. Therefore, it is possible that the *NY Times* offered more balanced coverage to the merger during the months that followed the cutoff date for this study's analysis. Because this study utilized qualitative research analysis it can be argued that analysis was limited by bias on the part of the researcher, and that another researcher may have found stronger anti-merger support using the same determinant variants.

Another limitation of the study is that it examined only newspaper coverage of the merger and online reports of post-merger effects as opposed to more comprehensive research that could have included radio and television coverage. Analysis of coverage patterns of different newspapers and/or media outlets such as the nightly television news or radio programs may have offered additional support for the propaganda model and the argument asserted in this thesis, or it may have proven the *NY Times* coverage to be the anomaly in terms of the merger.

### **Further Study Recommendations**

The study limitations posed in the preceding section necessitate a broader media scope of analysis. This would be beneficial in order to find more conclusive results of a macro analysis of the media, as opposed to merely the *NY Times*. While this study incorporated a multitude of other sources aside from the *NY Times*, they were primarily used to provide tangible effects of the merger and contextual data. In doing so, it is suggested that Maxwell McCombs and Donald Shaw's agenda setting theory is researched followed by an analysis using Elisabeth Noelle-Neumann's spiral of silence theory.

The results of this study suggest that an agenda is set by corporate and political officials to serve their own interests. As such, a thorough analysis of agenda setting theory is required to examine all the factors at play in setting the agenda. Furthermore, considering the disregard for the public interest and the public's protest of previous media mergers, including that of Comcast and NBC, and the Telecommunications Act of 1996, it is recommended that the spiral of silence theory be used to analyze effects on the public as a result of their marginalization by the media and government. Should results of the recommended further research prove to be in accordance with the results of this study it is then proposed that a more grand-scale study be conducted to investigate the tangible and testable aspects and attributes of the Illuminati. As Chomsky (Herman & Chomsky, 1988), Herman (1988, 2000), McMurtry (2002), Mosco (1999, 2006, 2008), and Robinson (2001) allude to, and at times explicitly state, a new world order is arguably inevitable due to the rise of transcultural corporations by way of corporate globalization, which is the result of media consolidation and propaganda.

### Conclusions

This study found that collusion was evident in the Comcast and NBC merger. Proof of collusion was Comcast's significant political connections, political lobbying and campaign contributions, and Comcast's influence on *NY Times* coverage of the merger. As was later shown, the merger was approved despite public opposition and the presupposed detrimental effects it had on the public interest. Given that it was shown in recent history (Protest, 2011), and is public knowledge, that previous mega media mergers have proved largely unsuccessful it is curious why the Comcast and NBC merger, the biggest on record, was approved during the worst financial crisis in almost a century and knowing the negative effects it would most likely have on the public. Considering Marxian ideology and the cultural studies works offered as philosophical assumptions for this study it is no surprise that the public interest was marginalized and wholly disregarded when the power structures inherent in media mergers (government and corporate entities) work together to perpetuate their power, wealth, influence, and voice through media ownership.

The Propaganda Model served as a valuable theoretical lens through which to study the issue of media consolidation and the collusive aspects involved. Although the advertising filter was not a point of focus for this study, and therefore not supported, the remaining four filters were validated, as were the model's first-, second-, and third-level predictions. In support of such, the Propaganda Model illustrated its strength in analyzing media behaviors and addressing the need for critical evaluation of the media. Because the Propaganda Model does not analyze media effects a meta-synthesis method was utilized, in light of the political economy of communication, to evidence the malign impact of this

thesis' case study. Chomsky (Achbar, 1992) urged that the first step to critically evaluate the media is for the public to make themselves aware of the forces in control, and to maintain an independent mind. Chomsky's urging is especially vital when considering Campbell, Fabos and Martin's assertion (2004) that, "advertising became the central economic support system for our mass-media industries... but an even more serious issue is the influence of advertising on our lives as democratic citizens" (p. 413). Furthermore, McChesney's (cited in Stossel, 1997) contention that dissenting voices are marginalized to the extent that, "US political culture does not permit any discussion of the fundamental weaknesses of capitalism... corporate media have encouraged the belief that even the consideration of alternatives was tantamount to a call for totalitarianism" (p. 99) makes Chomsky's advice even more pertinent. Awareness, however, is not enough. Media reform is necessary in order to circumvent the corporate and political powers in control of the mainstream media. The data of this study suggests that Barnett's (2009) recommendation of a publicly owned media entity funded by corporations, yet not subject to their direct influence, could be a worthwhile starting point for media reform.

As the media continue to consolidate and corporate ownership amasses greater power, money, and influence and control over the public and government officials, in effect creating a plutocracy, the public interest is increasingly marginalized and negatively impacted. A very real threat of corporate media globalization and transnationalization is global dominance by elites over the public by way of a propagandist media state. The manifestation of such a threat is arguably a new world order that endangers the public to subjugation to a global totalitarian state of corporate political rule.

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## Appendix

## Top Media Companies

## Top Newspaper Companies

<b>Rank</b>	<b>Company</b>	<b>Total Weekday Circulation</b>
1	Gannett	4,859,360
2	MediaNews Group	3,098,580
3	News Corporation	2,618,850
4	McClatchy Company	2,100,590
5	Advance Publications	1,448,610

[View All »](#)

## Top Online News Companies

<b>Rank</b>	<b>Company</b>	<b>Monthly Unique Visitors for All News Sites</b>
1	Yahoo	39,042,000
2	Time Warner	34,617,000
3	Comcast	29,438,000
4	Gannett	26,400,000
5	AOL	22,578,000

[View All »](#)

## Top Network TV Companies

<b>Rank</b>	<b>Company</b>	<b>Morning and Evening News Viewership</b>
1	Comcast	14,190,800
2	Walt Disney Company	12,606,700
3	CBS	8,840,100
4	Public Broadcasting Service	1,100,000

[View All »](#)

## Top Cable News Companies

<b>Rank</b>	<b>Company</b>	<b>Combined Cable News Viewership</b>
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1	News Corporation	1,910,000
2	Time Warner	1,040,000
3	Comcast	1,001,000
<a href="#">View All »</a>		

## Top Local TV Companies

Rank	Company	Combined Station Reach
1	News Corporation	25%
2	CBS	25%
3	Univision Communications	23%
4	Tribune Company	22%
5	Walt Disney Company	21%
<a href="#">View All »</a>		

## Top Magazine Companies

Rank	Company	Total Magazine Circulation
1	Time Warner	32,582,300
2	Hearst Corporation	30,037,000
3	Meredith Corporation	27,652,800
4	Advance Publications	18,668,300
5	Reader's Digest Association	14,456,500
<a href="#">View All »</a>		

## Top Radio Companies

Rank	Company	Total Radio Audience
1	CC Media Holdings Inc. (Clear Channel)	160,099,000
2	CBS	82,178,500
3	Cumulus Media Inc.	46,266,900
4	National Public Radio	27,200,000
5	Entercom	23,330,200

(www.stateofthemedias.org, 2012)

Letter to FCC

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**Congress of the United States**  
Washington, DC 20515

January 5, 2011

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: MB Docket No. 10-56

Dear Mr. Chairman:

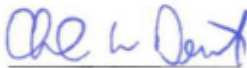
We are pleased to note that you have circulated to your colleagues an order on the Comcast-NBC Universal transaction. More than a year after Comcast and General Electric announced their intentions, and after nearly 11 months of detailed review, we understand that the draft order concludes that, based on all the filings, the joint venture will promote competition, investment, localism, diversity and innovation, and is in the public interest. Accordingly, we encourage you and your fellow Commissioners to complete your agency's review without further delay, and we hope this review would result in a bipartisan outcome.

No one can question the extensive and comprehensive examination this transaction has received. In addition to six Congressional hearings, the FCC's regulatory process has provided unprecedented opportunities for public participation. As the Commission itself has noted, the Comcast-NBCU transaction had the lengthiest formal pleading cycle that it has ever set for any similar transaction. Every stakeholder has had every opportunity to be heard.

Any further delay in your agency's review process, and any further efforts to laden the transaction with formal regulatory requirements, could undermine much needed jobs and investment.

We appreciate your prompt action to complete your agency's review

Sincerely,



Charles W. Dent  
Member of Congress



Michael Doyle  
Member of Congress

cc: Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker

<u>Joe Barton</u>	<u>Frank L. ...</u>
<u>Scott Sutter</u> KY-2	<u>Will R. ...</u>
<u>Al ...</u> IL-11	<u>... ..</u> CA-4
<u>Max Baer Mack</u>	<u>W. Mung ...</u>
<u>Ken ...</u> OH-5	<u>John ...</u> OK-1
<u>Mike ...</u> PA-08	<u>John ...</u>
<u>Eddie Bonnie Schwan</u>	<u>Crime Brown</u>
<u>Alan ...</u>	<u>Bill ...</u>
<u>... ..</u>	<u>Laura ...</u>

Tim Murphy

Bill Shust

Sgt. P.H.

Fred R. Lantz

Patricia Muel

John LeBardo NS-2

Jim G. Lantz

Leonard Lantz

John G. Thompson A-05

Tom Marino

AP Jell

Tim Holden

Chuck Fattet

Phu A. B. B.

Allyson J. Dunning

Joan Altmire

W. S. A.

Michael C. G.

Lynda A. VA-16

Steve Sule

Gary Harper

W.D. Roge

John S. 19

Ralph M. Hall

Ed Whiz

Charles F. Boaz

Carl Starny <sup>FL</sup>

Phil Perry

Sue Myrick

Arthur E.

Tim Murphy <sup>PA</sup>

Charles W. WA

Fate Olson <sup>TX</sup>

Doug Wadsworth <sup>OR</sup>

Mike Lenny <sup>DC 02</sup>

Don F. Kelly <sup>CA</sup>



Lou Bartlett

A. M.

Barbara

CM

Robert E. Anderson

Gusman

Alan L. Hastings

Arthur W. Bullock Jr.

E. Jones

Donald E. Tompkins

Steve Cohen

Larry Kindell

Ed Pitt

John Bann

Chris Smith

Rob Schae

John


John Lewis



The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
January 6, 2011


  
Member of Congress

Member of Congress



Member of Congress

Member of Congress



Member of Congress

*Kiana Cos. Seltman*  
Member of Congress

  
Member of Congress


Member of Congress

  
Member of Congress

W. L. L. L.  
Member of Congress


  
Member of Congress

  
Member of Congress

  
Member of Congress

  
Member of Congress

  
Member of Congress

  
Member of Congress

Member of Congress

  
Member of Congress

cc: Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Meredith Attwell Baker

Richard L. Hall  
Mike Ross

Joe Courtney

Steven Rothman

Lisa DeLaurio

Red Rauten

Loretta Sanchez

La La

Gregory W. Meeks

Hammond L. Berman

Karl Albert

Steve Chaffetz

Sam Johnson

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\_\_\_\_\_

Signed (97):

Charles W. Dent  
 Michael Doyle  
 Joe Barton  
 Fred Upton  
 Brett Guthrie  
 Mike Pompeo  
 Adam Kinzinger  
 Cory Gardner  
 Mary Bono Mack  
 Morgan Griffith  
 Robert E. Latta  
 John Sullivan  
 Michael G. Fitzpatrick  
 Adam Smith  
 Eddie Bernice Johnson  
 Corrine Brown  
 Albio Sires  
 Bill Cassidy  
 Donna M. Christian-Christensen  
 Laura Richardson  
 Tim Murphy  
 Tom Marino  
 Bill Shuster  
 Rodney Frelinghuysen  
 Joseph R. Pitts  
 Tim Holden  
 Todd Russell Platts  
 Chaka Fattah  
 Patrick Meehan  
 Robert Brady  
 Frank A. LoBiondo  
 Allyson Y. Schwartz  
 Jim Gerlach  
 Jason Altmire  
 Leonard Lance  
 Mark S. Critz  
 Glenn Thompson  
 Michael Burgess  
 Phil Gingrey  
 Steve Scalise  
 Sue Myrick  
 Gregg Harper  
 Marsha Blackburn  
 Mike Rogers (MI)  
 John Shimkus  
 Cathy McMorris Rodgers  
 Ralph M. Hall  
 Pete Olson  
 Ed Whitfield  
 Greg Walden

Charles Bass  
 Lee Terry  
 Cliff Stearns  
 Brian P. Bilbray  
 Lou Barletta  
 Gerald E. Connolly  
 Jim Himes  
 Steve Cohen  
 Pedro R. Pierluisi  
 Larry Kissell  
 Chris Murphy  
 Ed Perlmutter  
 Robert E. Andrews  
 John Barrow  
 G. K. Butterfield  
 Chris Smith  
 Alcee L. Hastings  
 Adam Schiff  
 Sanford D. Bishop, Jr.  
 Joseph Crowley  
 Edolphus Towns  
 John Lewis  
 Joe Baca  
 Dennis A. Cardoza  
 Jim Costa  
 Luis V. Gutierrez  
 Silvestre Reyes  
 Ileana Ros-Lehtinen  
 Michael E. Capuano  
 John B. Larson  
 Mario Diaz-Balart  
 Henry Cuellar  
 David Rivera  
 Steve Rothman  
 Gregorio Kilili Camacho Sablan  
 Heath Shuler  
 Richard E. Neal  
 Joe Courtney  
 Mike Ross  
 Rosa L. DeLauro  
 Ted Deutch  
 Loretta Sanchez  
 Sam Graves  
 Gregory W. Meeks  
 Howard L. Berman  
 Ken Calvert  
 Jason Chaffetz  
 Sam Johnson

**Comcast Executives**

Justin B. Smith – Vice President, Chief Transaction Compliance Officer and FCC Ombudsman: No political affiliation was found aside from Smith’s role as FCC Ombudsman. Comcast describes Smith’s responsibilities as Ombudsman as maintaining the company’s “compliance with governmental and third-party conditions and commitments arising out of the Comcast and NBCUniversal joint venture transaction” (Comcast Corporate Executives, 2012).

Joseph McGinley – Vice President, Corporate Development: No political affiliation was found aside from McGinley’s role with Cerberus Capital Management prior to joining Comcast. His role at Cerberus was Vice President in which he directed “all facets of acquisition strategy for several Cerberus-controlled companies” (Comcast Corporate Executives, 2012). Cerberus, of course, being not only “one of the world’s leading private investment firms”, as Comcast describes, but also a company that was found to be involved in a contracting scandal tied in with privatized VA hospitals during the Bush-Cheney administration, a scandal involving the mismanagement of funds for the U.S. Navy and Marine corps, as well as being a significant donor and fundraiser for several political campaigns including Democratic Senator Joseph Lieberman, and Republican Congressman Jerry Lewis ([www.democraticunderground.com](http://www.democraticunderground.com) 2012). Each scandal and fundraiser came during McGinley’s time as Vice president of Cerberus, 2002-2005 (LinkedIn Corporation, 2012).

Karen Dougherty Buchholz – Vice President, Administration: Buchholz is listed as a sales executive for Comcast-Spectacor from 1993 – 1997; however, there is no description of her role or responsibility from 1997 – 2000 during which time she was

appointed by PA Democratic Governor Edward G. Rendell to head a group that brought the Republican National Convention to Philadelphia. Buchholz was Special Assistant to then Republican State Treasurer Barbara Hafer during her gubernatorial campaign.

Buchholz began her political work in Washington D.C. as a Special Assistant to Republican Senator John Heinz (Comcast Corporate Executives, 2012).

Sena Fitzmaurice – Vice President, Government Communications: Fitzmaurice worked at Comcast from 1996-1997 as manager of public relations before leaving to work as a principal with the political lobbying firm Wexler & Walker. At Wexler & Wexler Fitzmaurice worked as a director creating strategic public affairs plans for clients Comcast and Nielsen Media Research (Comcast Corporate Executives, 2012).

Rebecca Arbogast – Vice President, Global Public Policy: Arbogast was the chief of the International Bureau Telecommunications Division at the FCC and served in the office of legal counsel of the U.S. Department of Justice (Comcast Corporate Executives, 2012). Prior to joining Comcast, Arbogast was the managing director at Stifel Nicolaus, “a financial services firm that prepared an analysis” of the Comcast and NBC merger (Stelter, 2009d). Arbogast was quoted in the article as being in full support of the merger and unable to understand why anyone, especially the government, would find the merger to be anti-competitive.

Melissa Maxfield – Senior Vice President, Federal Government Affairs: Maxfield fostered her political prowess in senior positions with the Senate and House PAC, and as a political liaison for the Democratic Senatorial Campaign Committee. In 1990 she worked for Democratic Senator Bill Nelson’s gubernatorial campaign, in 1992 she worked for Democratic Senator Bob Kerrey’s Presidential campaign, and his 1994 Senate

re-election campaign. She also worked as a top political staffer for Senator Tom Daschle from 1999-2003 and his re-election campaign from 1996-1998. Comcast (Comcast Corporate Executives, 2012) boasts of Maxfield's recognition as "among the 'Top Corporate Lobbyists in Washington'" in 2009 and 2010, and [opensecrets.org](http://opensecrets.org) (2012) also lists Maxfield as a heavily influential lobbyist in 2011.

Kyle McSillarow – President, Comcast NBC Universal: Before joining Comcast McSillarow was President and CEO of the National Cable and Telecommunications Association (NCTA), "where he was the cable industry's primary public policy advocate in Washington, D.C., and represented the industry's interests before Congress, The Federal Communications Commission, and the Administration" (Comcast Corporate Executives, 2012). From 2007-2010 McSillarow served on the President's National Security Telecommunications Advisory Committee. His professional background is also comprised of a stint as Deputy Secretary of the U.S. Department of Energy, National Chairman for former Republican Vice President Dan Quayle's campaign for Presidency from 1998-2000, Chief of Staff for late Republican U.S. Senator Paul Coverdell, and Deputy Chief of Staff and Chief Counsel for Republican Senate Majority Leaders Bob Dole and Trent Lott from 1995-1997. In addition, McSillarow was the Republican nominee for Virginia's 8<sup>th</sup> Congressional District in 1992 and 1994 (Comcast Corporate Executives, 2012).

David Cohen – Executive Vice President: Cohen served as Chief of Staff for Democratic Mayor Edward G. Rendell of Philadelphia from 1992-1997 (Comcast Corporate Executives, 2012).

Neil Smit – President and Chief Executive Officer, Comcast Cable and Executive Vice President, Comcast Corporation: Smit sits on the Board of Directors for the National Cable and Telecommunications Association, and C-SPAN (Comcast Corporate Executives, 2012), “a private, non-profit company created in 1979 by the cable television industry as a public service” (C-Span, 2012).

Brian L. Roberts – Chairman and Chief Executive Officer: Roberts serves on the Board of Directors for the National Cable and Telecommunications Association, where he also served as Chairman from 1995-1996 and 2005-2007. His professional biography on Comcast’s site proudly mentions that Roberts was Chairman of the NCTA when the Telecommunications Act of 1996 was passed into law. In Chapter 2 Roberts’ own account of lobbying for the Act’s passage was presented (Comcast Corporate Executives, 2012).

**Baker Letter**

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**JOINT CONCURRING STATEMENT OF COMMISSIONERS ROBERT M.  
MCDOWELL AND MEREDITH ATTWELL BAKER**

*Re: Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. For Consent to Assign Licenses and Transfer Control of Licensees, MB Docket No. 10-56, FCC 11-4*

Combining assets of Comcast Corporation (Comcast) and NBC-Universal, Inc. (NBCU) is a complex and significant transaction that has the potential to bring exciting benefits to consumers that outweigh potential harms.

However interesting and intricate the issues raised by the combination of Comcast and NBCU may be, as a matter of law, our role at the Commission is limited to ensuring that the transaction complies with all applicable statutory provisions, such as ensuring that the license transfers are in the public interest. Our analysis should only include a thorough examination of the potential benefits and harms of the transaction. Any proposed remedies should be narrow and transaction specific, tailored to address particular anti-competitive harms. License transfer approvals should not serve as vehicles to extract from petitioners far-reaching and non-merger specific policy concessions that are best left to broader rulemaking or legislative processes.

The Commission's approach to merger reviews has become excessively coercive and lengthy. This transaction is only the most recent example of several problematic FCC merger proceedings that have set a trend toward more lengthy and highly regulatory review processes that may discourage future transactions and job-creating investment.

In this instance, our review exceeded its limited statutory bounds. Many of the conditions in the Memorandum Opinion and Order (Order) and commitments outlined in separate letter agreements were agreed to by the parties. The resulting Order is a wide-ranging regulatory exercise notable for its "voluntary" conditions that are not merger specific. The same is true for the separate "voluntary" commitments outlined in Comcast's letter of agreement dated January 17, 2011. While many of these commitments may serve as laudable examples of good corporate citizenship, most are not even arguably related to the underlying transaction. In short, the Order goes too far.

More significantly, the Order has the potential to shape the future of entire industries, including the nascent online video market, on the basis of a record that is by necessity limited to facts pertaining only to the two parties. At a time of



innovation and experimentation that is both dynamic and disruptive, the Order fails to recognize that the contours of our collective video future are best shaped outside the Beltway.

To secure approval of the underlying transaction, we therefore concur. (Wright, 2011).

**Conditions**

- Ensuring Reasonable Access to Comcast-NBCU Programming for Multichannel Distribution. Building on successful requirements adopted in prior, similar transactions, the Commission is establishing for rival multichannel video programming distributors (MVPDs) an improved commercial arbitration process for resolving disputes about prices, terms, and conditions for licensing Comcast-NBCU's video programming. The Commission is also requiring Comcast-NBCU to make available through this process its cable channels in addition to broadcast and regional sports network programming.
- Protecting the Development of Online Competition. Recognizing the risks this transaction could present to the development of innovative online video distribution services, the Commission has adopted conditions designed to guarantee bona fide online distributors the ability to obtain Comcast-NBCU programming in appropriate circumstances. These conditions respond directly to the concerns voiced by participants in the proceeding—including consumer advocates, online video distributors (OVDs), and MVPDs—while respecting the legitimate business interests of the Applicants to protect the value of their content. Among other things, the Commission requires that Comcast and/or Comcast-NBCU:
  - Provides to all MVPDs, at fair market value and non-discriminatory prices, terms, and conditions, any affiliated content that Comcast makes available online to its own subscribers or to other MVPD subscribers.
  - Offers its video programming to legitimate OVDs on the same terms and conditions that would be available to an MVPD.
  - Makes comparable programming available on economically comparable prices, terms, and conditions to an OVD that has entered into an arrangement to distribute programming from one or more of Comcast-NBCU's peers.
  - Offers standalone broadband Internet access services at reasonable prices and of sufficient bandwidth so that customers can access online video services without the need to purchase a cable television subscription from Comcast.
  - Does not enter into agreements to unreasonably restrict online distribution of its own video programming or programming of other providers.
  - Does not disadvantage rival online video distribution through its broadband Internet access services and/or set-top boxes.
  - Does not exercise corporate control over or unreasonably withhold

- programming from Hulu.
- **Access to Comcast's Distribution Systems.** In light of the significant additional video programming Comcast will control after the merger with NBCU—programming that may compete with third-party programming Comcast currently carries or otherwise would carry on its MVPD service—the Commission requires that Comcast not discriminate in video programming distribution on the basis of affiliation or nonaffiliation with Comcast-NBCU. Moreover, if Comcast “neighborhoods” its news (including business news) channels, it must include all unaffiliated news (or business news) channels in that neighborhood. The Commission also adopts as a condition of the transaction Comcast's voluntary commitment to provide 10 new independent channels within eight years on its digital tier.
  - **Protecting Diversity, Localism, Broadcast and Other Public Interest Concerns.** The Commission is also imposing conditions and accepting voluntary commitments concerning a number of other public interest issues, including diversity, localism, and broadcasting, among others. For example, to protect the integrity of over-the-air broadcasting, network-affiliate relations, and fair and equitable retransmission consent negotiations with the joint venture, the Commission adopts a series of conditions that were independently negotiated between the Applicants and various network affiliates.
  - **The Applicants have also made a number of additional voluntary commitments, many of which the Commission has adopted as conditions to the transaction's approval. Most of these commitments are geared towards enhancing the public interest as a result of the joint venture. These commitments include:**
    - **Broadband Adoption and Deployment.** Comcast will make available to approximately 2.5 million low income households: (i) high-speed Internet access service for less than \$10 per month; (ii) personal computers, netbooks, or other computer equipment at a purchase price below \$150; and (iii) an array of digital literacy education opportunities. Comcast will also expand its existing broadband networks to reach approximately 400,000 additional homes, provide broadband Internet access service in six additional rural communities, and provide free video and high-speed Internet service to 600 new anchor institutions, such as schools and libraries, in underserved, low-income areas.
    - **Localism.** To further broadcast localism, Comcast-NBCU will maintain at least the current level of news and information programming on NBC's and Telemundo's owned-and-operated (“O&O”) broadcast stations, and in some cases expand news and other

- local content. NBC and Telemundo O&O stations also will provide thousands of additional hours of local news and information programming to their viewers, and some of its NBC stations will enter into cooperative arrangements with locally focused nonprofit news organizations. Additional free, on-demand local programming will be made available as well.
- **Children's Programming.** Comcast-NBCU will increase the availability of children's programming on its NBC and Telemundo broadcast stations, and add at least 1,500 more choices to Comcast's on-demand offerings for children. It will provide additional on-screen ratings information for original entertainment programming on the Comcast-NBCU broadcast and cable television channels and improved parental controls. Comcast-NBCU also will restrict interactive advertising aimed at children 12 years old and younger and provide public service announcements addressing children's issues.
  - **Programming Diversity.** Building on Comcast's voluntary commitments in this area, we require Comcast-NBCU to increase programming diversity by expanding its over-the-air programming to the Spanish language-speaking community, and by making NBCU's Spanish-language broadcast programming available via Comcast's on demand and online platforms. As noted above, Comcast also will add at least 10 new independent channels to its cable offerings.
  - **Public, Educational, and Governmental ("PEG") Programming.** Comcast will safeguard the continued accessibility and signal quality of PEG channels on its cable television systems and introduce new on demand and online platforms for PEG content. (Wright, 2011).