



CHANGE the CHANNELS



TOOLKIT

Change the Channels Toolkit

The Federal Communications Commission has rules in place to protect local communities from media monopolies. These rules limit media consolidation in TV and radio markets so that companies cannot monopolize production of and access to local news and information broadcast via the public airwaves. The rules support healthy media markets by ensuring that broadcasters compete for local audiences and promote diverse and independent perspectives on issues facing local communities.

But there are loopholes. Even though companies may **own** only a limited number of TV stations in one area, many stations claim that as long as a company's name isn't on the broadcast license, it can control everything from news programming to office operations, without being considered an "owner." To make matters worse, stations argue that in many cases, they don't even have to tell anyone what they are doing. We call this **covert consolidation**, because it allows stations to skirt the FCC media ownership rules in a sneaky way.

In more than 80 communities across the country, covert consolidation deals have had an enormous impact on local news. In the worst cases, one television source for local news and information now stands in for two or three. Honolulu, Denver, Peoria, Syracuse and many more cities deal with the impacts of covert consolidation every day.

These covert consolidation deals take many forms, but the results are the same: Media companies pad their bottom line by sacrificing local independent journalism, competition and diversity, leaving viewers with less information about their communities and fewer journalists holding our public servants accountable.

Since covert consolidation has a uniquely local impact, it has to be addressed as both a local and a national issue. That's why you are so important to the fight against covert consolidation. You can take action using the ideas in this toolkit to fight for the news and information your community needs. You can:

Document the Problem *(See page 3)*

- Make a video.
- Inspect broadcasters' public files.

Mobilize your Community *(See page 8)*

- Gather signatures on our petition.
- Write a letter to the editor or an op-ed.
- Spread the word via social networks, listservs, blogs or newsletters.
- Host a meetup and help plan a local event.

Educate your Lawmakers *(See page 12)*

- Host in-district meetings with your representatives in Congress.
- Call and email your representatives in Congress.
- Contact state and local legislators.

Go the Distance *(See page 14)*

- Stay engaged with the movement.

Use this toolkit as a guide to help you fight covert consolidation and connect with other media reform activists. Together we can create better media. It's time to change the channels.

Thanks for all you do,

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Documenting Covert Consolidation

Video Documentation

We need local people to document and record what covert consolidation looks like on the ground. You can help us build our case by recording covert consolidation in your community.

STEP 1: PREPARE

Watch purportedly independent stations ahead of time and identify how consolidation influences what you are seeing. Are your stations sharing newscasts? Sharing scripts, reporters and video footage? Sharing other resources? You can see some examples in our video here: <http://www.changethechannels.org>

Once you identify what type of sharing is present, you will be better prepared to capture footage. For example, if stations are sharing newscasts, you may need to flip between channels while recording to show multiple channels airing the same thing at the same time. Or you may find that one station airs its evening newscast at 10 p.m. while the partner station airs essentially the same newscast at 11 p.m. If you're not sure, visit the interactive map at [ChangetheChannels.org](http://www.changethechannels.org) and find your community. Click on the dot over your community to read details on the type of covert consolidation found there.

Once you figure that out, gather materials for your video capture. You'll need a TV, a recording device and a remote control. The instructions below are for recording on one TV, but if you have access to two TV's side by side that is also useful.

You will be able to handle most of this from your home, but another option is to partner with a local campus or public access station that may have more resources and equipment.

STEP 2: CAPTURE

Now you're ready to capture one of the following types of footage.

1. Sharing newscasts: Stations share the exact same newscasts at the same time.

Flip the channels, and you'll see the same thing aired at the same time. Same anchors, same footage.

When you are ready to record a story, flip through the channels to reveal the same anchors and the same footage on different channels. It's best if you display the remote in the corner or side of the screen to show the names of the different channels. Also make sure you have a good view of the channels on screen to demonstrate the difference.

Tip: Watch the video at [ChangetheChannels.org](http://www.changethechannels.org) for an example.

2. Sharing reporters and video: Stations report on the same stories but have different anchors.

The scripts are basically the same and so are the reporters. You'll see pretty much the same video and graphics. They might air at different times.

If the stories air at the same time, use the instructions under #1 to record both stories on different stations. If they air at different times, capture both stories.

3. Sharing resources (local news sharing): Stations use the same video in different stories.

This is the most difficult to capture, since the same video may be used in different stories. It takes capturing a lot of footage and then comparing the video to see if the same camera angle is used. Once you find the footage, you can edit both stories. You may see this during stories about local court proceedings, police action or a local event.

STEP 3: SEND IN YOUR VIDEO

Now that you've captured an example of local covert consolidation on video, share it! Email us at channels@freepress.net to get further uploading instructions. In your email include the name of city and the stations involved.

We'll add the files to our site [ChangetheChannels.org](http://www.changethechannels.org).

Good luck and have fun!

Documentation Tips

Here are some things to remember:

- The more significant the news story you use to demonstrate the duplication, the more interesting it will be for viewers to watch.
- Make sure the sound is good quality and the volume isn't too loud or too quiet.
- Include the channel identification on the screen and the remote control if you are clicking back and forth.
- Use the same format used during uploads to YouTube. Here is some useful information: www.google.com/support/youtube/bin/answer.py?answer=55744
- If you are using miniDV or other tapes, you will need to convert them into a digital file to send to us.
- Edited videos should be no more than 90 seconds in length.

Inspect the Broadcasters' Public Files

All stations are required to maintain "public files" that include information about station ownership, educational and community affairs programming and public complaints. Certain types of covert consolidation agreements must be listed in the public files for the stations involved. You can inspect the files to collect the details of some covert consolidation agreements to help build the case against this practice.

STEP 1: PREPARE

Check the map on *ChangetheChannels.org* to determine what kind of agreement is in place in your community. The following agreement types should be listed in the public file: Local Marketing Agreement, Joint Operating Agreement, and Time Brokerage Agreement. These deals may also be listed as Shared Services Agreements.

Plan to visit all of the stations involved in covert consolidation. They may even share studios in the same building. Each station should maintain a separate public file. If the public files are merged, take note. That's a red flag.

Invite other local media reformers to join you, and consider letting Free Press know you're planning the trip; we may be able to connect you with other local activists.

STEP 2: WHAT TO EXPECT

Stations are required to show the public files to anyone who asks to see them. Simply show up during regular business hours and ask to see the public file. You don't need to explain why you want to see the file or mention your affiliation. For more information on visiting stations' public files, please consult the FCC guide **The Public and Broadcasting: How to the Get the Most Service from Your Local Station**. [http://transition.fcc.gov/mb/audio/decdoc/public_and_broadcasting.pdf]

Station staff will most likely be courteous and helpful. But if they're rude, unhelpful or unwilling to show you the file, take note.

Station staff will either take you directly to the files, or they may ask which files you're looking for and bring those files to you. They may leave you alone with the files, or they may stay with you as you inspect the files.

The public file will most likely consist of papers in file folders. However, if parts of the public file are on a computer database, the station must provide you with a computer terminal to examine them.

STEP 3: AT THE STATION

Ask to see the Local Marketing Agreement, Joint Operating Agreement, Time Brokerage Agreement or Shared Services Agreement.

Also ask to see the station's Issues/Programs Lists. These lists are filed quarterly and document which local issues the station covered and how it covered them. This information will usually be organized by issue in separate files, with examples of when and how the issues were covered on the air.

Tip: Stations sometimes list bizarre examples of how they serve the public interest. For example, an FCC report issued in June 2011 notes that one TV station claimed to serve local audiences by listing the following on-air announcement as a "program" providing significant treatment of a community issue: "America's Next Top Model Casting Call ... an open casting call for Cycle 14 of America's Next Top Model on July 11 from 2-4 p.m. at Seven Sushi Ultralounge, sponsored by Sunny's Hair and Wigs."

You can either ask to take pictures with a digital camera or request photocopies of all documents you're interested in. The station is required to make any photocopies that you request, either for free or for a "fair price." If you're asking for several copies, they may want to mail them to you. The station must pay postage to send the photocopies and must send them within seven days.

If you visit more than one station involved in the same covert consolidation deal, compare these lists to determine how much they overlap.

STEP 4: FOLLOW UP

After your visit, contribute your findings to the body of research we are collecting. Send what you found to channels@freepress.net. We may add information to the map at ChangetheChannels.org and use it to make our case against covert consolidation to the FCC.

Mobilize Your Community and Encourage Action

One of the most important things you can do to raise awareness and encourage others to take action is to share your understanding of covert consolidation. In this section you'll learn about ways to spread the word.

Action 1: Send a Letter to the Editor

Letters to the editor are among the most widely read sections of the newspaper. Many members of Congress scan these letters to gauge their constituents' interests and opinions. Draw attention to covert consolidation with a letter that communicates the local importance of the issue.

To find contact information for newspapers and other media, use the online database at www.congress.org/congressorg/dbq/media. Type in a zip code to get information for media outlets in that area.

TIP!

Specifications for letters vary, so learn about your local newspaper's guidelines ahead of time. For a sample letter to the editor, check the Resources section of the Change the Channels Toolkit.

Action 2: Use Facebook, Twitter and other Social Media

The Internet is a much more democratic communications medium than traditional media like newspapers and TV. Social networks and listservs offer opportunities for anybody to easily publish their ideas and provide forums for others to share, comment and respond. Consider linking to your community's entry on ChangetheChannels.org to give people an easy way to learn more and get involved. **Wondering which hashtags to use?** We use "#changethechannels" and "#bigmedia" when we post online about Change the Channels. "Covert Consolidation" makes a good tag for blog posts.

Action 3: Start a Local Media Reform Meetup

Meetups are a great way to engage others in the *ChangetheChannels.org* campaign. Invite a speaker, show a video or deliver a presentation as the party's centerpiece.

Prepare discussion questions and additional information. Think of a few questions to facilitate a conversation about covert consolidation. For example, you may want to ask people what problems they've noticed with local TV, and whether covert consolidation might be a cause. Download additional informational handouts and resources to give to guests at savethenews.org/changethechannels or order by calling 877-888-1533.

Be sure to identify next steps for the group. Pass around a sign-up sheet to collect contact information. Printed copies of the Change the Channels petition make great sign-up sheets; you can download them from the resources link above. Identify a follow-up action you'd be willing to organize, like collecting petition signatures at a neighborhood event, collecting video of what covert consolidation looks like in your town, organizing a visit to your consolidated stations to inspect their public files or meeting with your elected officials.

Encourage participants to visit the Change the Channels site (*ChangetheChannels.org*) and sign up to receive our e-activist alerts via email. You can also suggest that participants follow *SavetheNews.org* on Facebook and Twitter.

Follow up. Let us know how your meeting went and how we can support your next steps. Email channels@freepress.net to get in touch.

TIP!

You can find clips and short videos about covert consolidation at *ChangetheChannels.org*. Consider local professors, representatives of local independent media, politicians who have been outspoken about media reform or representatives from media reform groups as possible speakers.

Letter to the Editor Tips

Here's how you can increase the likelihood that your piece will be printed:

Check the specifications. Length and format requirements vary. Specifications are often featured on the editorial page or the opinion page on the newspaper's website, or you can call the paper to request guidelines. Find out the best way to send your letter. Read the letters published in your paper to get ideas on successful style, format, etc. Follow similar steps for newsletter columns.

Make it timely. Your letter could address how the media recently ignored or mishandled a critical issue, or you might wish to discuss a timely media policy issue. It is often effective to respond directly to a story recently published in the paper.

Make it local. Whatever you're writing about, relate it to local issues and discuss how it will affect your community. For instance, you could refer to your local legislator's position on an issue or refer to a local media outlet.

Inform. Stick to the facts and first-hand information.

Write with verve. Use humor and emotion where appropriate. Employ personal accounts. Choose clear, direct, and powerful language.

Keep it brief. Try to make just one point in your letter. State the point clearly in your topic paragraph. Most newspapers limit letters to the editor to 150–200 words, while op-eds are typically 700 words or less. and newsletter columns. Submissions that exceed wordcount limits will be edited or not printed.

Make it easy. When you submit your piece, include your full name, address, daytime phone number and email address. Without this information, your letter may not be printed.

Sample Letter to the Editor

We encourage you to write your own letter about your experience with covert consolidation in your community, but here is a model you can work from if you choose. Not all communities suffer the same effects of covert consolidation, so edit the letter to match facts on the ground.

Dear Editor,

I depend on local TV news to stay informed. That's why I was astonished to discover that two local broadcast TV stations are colluding to cut corners in local news rather than competing to provide the best scoops and stories to the community. STATION and STATION have merged newsrooms, laid off journalists and are airing the exact same news on both stations. This degree of consolidation should be illegal, but media companies are exploiting a loophole in the Federal Communications Commission's rules at the community's expense.

The airwaves belong to the public, and in exchange for using this resource, broadcasters agree to provide programming in the public interest. Airing duplicative news does not serve our community's news and information needs.

The FCC is currently reviewing its media ownership rules, and it has the power to stop media companies from cutting these sneaky deals. We need our legislators to advocate for diverse local news coverage. I urge Representative NAME to write to the FCC and demand an investigation of "covert consolidation."

Sincerely,
Your name
City/Town

How to "Lobby" Your Elected Officials on Covert Consolidation

The word "lobbyist" often conjures up images of high-priced lawyers in fancy suits. But the reality is that all of us can "lobby" our representatives in Congress.

One of the best ways to lobby is through a face-to-face "in-district" meeting. While in Washington, legislators are lobbied heavily by broadcast companies. So it's important for legislators to hear from you when they're back home.

Here's how you can get started.

An In-District Meeting with Your Representatives in Congress

STEP 1: PREPARE

Invite people. Assemble a small group to attend the meeting with you. Agree on one particular issue to address, such as urging your legislator to support the FCC's efforts to stop covert consolidation.

Make an appointment. The month-long August recess and other congressional breaks are often the best time to schedule appointments. Call the legislator's home district office (not the Washington, D.C. office) and ask for the name of the scheduler. Fax a written request for a meeting to the scheduler's attention. In your fax, be sure to include your name and contact information, note the issue you'd like to discuss and suggest a range of potential meeting times. Follow up with a call to the scheduler within a few hours of sending the fax.

Create talking points and bring materials. Agree on a few key talking points and write them down. Find out your legislator's record on the issue you will be addressing, and plan to address this during the meeting. Make copies of fact sheets that you can share with other attendees during the meeting. Find fact sheets on Change the Channels at: savethenews.org/changethechannels

Expect a brief meeting. Plan to have each participant in your group briefly make one important and unique point during the meeting. Leave time for the legislator or staffer to ask questions and respond to your request for action. Note that meetings with a legislator can be as short as 10–15 minutes, although meetings with legislative staff may be longer.

STEP 2: AT THE MEETING

Be polite, clear and concise. Tell the legislator how the issue affects you personally and provide facts and examples to support your argument. Don't be argumentative; keep the tone positive.

Ask for a specific action. For example: "Will you sign a letter or make a public statement calling on the FCC to investigate covert consolidation?" It's OK if the legislator or staffer needs to get back to you later with an answer.

STEP 3: FOLLOW UP

Document the meeting. Make certain that one person in your group takes notes so you can report back to others about what was said. It's also useful to bring a digital camera and to ask the legislator or staffer to pose for a picture with the members of your group.

Exchange contact information. Make sure that you get a business card from the person that you meet with. If you have a card, leave it behind.

Follow up. Send a thank-you note and watch for your legislator's action on the issue. If a commitment has been made to you, make note of whether there is follow-through.

Let us know how it went. We'd love to hear about your meeting. Email us at channels@savethenews.org. Share your success stories or tactics with others.

Go the Distance

Your actions in support of the Change the Channels campaign are part of a growing movement that is demanding better journalism and diverse media ownership, a world-class public media system and protection for the free and open Internet.

This movement is bringing together people everywhere who believe that reforming the media is the first step in transforming the world. We know that the media we have isn't the only option. We know that we can impact the policies that determine the quality of our media and the future of our planet.

Now that you've taken action and are excited about creating better media you can stay engaged with the movement of media reformers. Here are a few ways to stay engaged:

- **Join** the Free Press E-Activist Network at www.freepress.net to receive occasional emails regarding pressing media reform issues.
- **Sign up** at www.freepress.net to get breaking news and useful analysis via the Media Reform Daily newsletter.
- **Follow** the Free Press social networks on Facebook and Twitter. Distribute stickers and flyers in your community.
- **Attend** media reform events such as the National Conference for Media Reform, issue-specific hearings, summits and other events. Volunteer with us.
- **Learn** more about our lobbying arm, the Free Press Action Fund. The Action Fund relies on contributions from individuals to keep its work going. The Action Fund does not accept funds from government entities, political parties or businesses.

Contact Free Press at 877.888.1533, email channels@freepress.net or visit us on the web at www.freepress.net and ChangetheChannels.org if you're interested in pursuing any of these actions.