

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

In re: 2022 Quadrennial Regulatory Review –
Review of the Commission’s Broadcast
Ownership Rules and Other Rules Adopted
Pursuant to Section 202 of the
Telecommunications Act of 1996

MB Docket No. 22-459

**COMMENT OF THE ARCHIVAL PRODUCERS ALLIANCE, THE FUTURE FILM
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MEDIA, TELECOM, AND INTERNET COUNCIL (MMTC), PUBLIC KNOWLEDGE,
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Summary:

This comment urges the Commission to retain the current local media-ownership rules. As described in depth below, these rules safeguard localism in broadcast media, which is critically important for our nation’s democratic health. Media consolidation reduces both the quantity and quality of local news programming, while simultaneously limiting viewpoint diversity by decreasing market competition. New media options do not provide adequate substitutes for the local broadcast ecosystem, particularly in rural communities. Moreover, there is no empirical evidence that loosening the local media-ownership rules would meaningfully enhance localism or diversity. Thus, any change to these rules risks irreparable harm to local broadcast system and the civic purpose it serves. At a minimum, before the Commission takes any action to raise the local broadcast ownership caps, it should commission empirical research on the current state of local broadcast media, especially local news coverage, viewpoint diversity, and competition, and evaluate the effects of recent media consolidations.

I. Background and Interests of Commenters

We appreciate the opportunity to submit comments on the Commission’s 2022 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996. Undersigned commenters represent a wide variety of experts and stakeholders in the local media environment, including independent film professionals, former broadcasters, academics, and public interest nonprofits. Specifically, undersigned commenters include:

- **The Archival Producers Alliance (APA)** promotes the value, use, protection, and preservation of authentic archival materials. Founded in 2023, the APA represents over 550 archival producers - and counting - from across the US and internationally. APA uses their unique collective knowledge to influence policy and affect change within the industry through the creation of best practices around the use of generative AI in nonfiction media, developing methods for Local TV News Preservation and through supporting the visibility of Archival Producers within the field.
- **The Future Film Coalition (FFC)** is a national alliance representing independent film professionals and organizations with a mission to ensure that U.S. independent filmmaking flourishes alongside the broader entertainment industry by championing field-wide efforts securing visibility, resources, and public policy protections that will fortify the independent film ecosystem and ensure audiences benefit from a diverse and thriving cultural landscape for generations to come.
- **The Media and Democracy Project** is a non-partisan, grassroots civic membership organization fighting for more informative and pro-democracy media operating in the public interest.
- **The Multicultural Media, Telecom and Internet Council (MMTC)** is a non-partisan, national nonprofit organization dedicated to promoting and preserving equal opportunity and civil rights in the mass media, telecom and broadband industries, and closing the digital divide. MMTC is generally recognized as the nation's leading advocate for minority advancement in communications.
- **Public Knowledge** is a nonprofit organization that promotes media policies that serve the public interest. Founded in 2001, Public Knowledge works to ensure that communications law and policy serve the public. The organization's work includes issues including media ownership, broadband access, and policies affecting news and information ecosystems. Public Knowledge's interest in this proceeding arises from its mission to preserve access to diverse sources of local news and information. Media consolidation poses direct risks to the availability of local journalism, the diversity of viewpoints represented in broadcast programming, and the competitiveness of local media markets. Broadcast media remain a primary information source for millions of Americans, and policies that permit excessive consolidation undermine the local accountability and responsiveness that the Communications Act was designed to protect.
- **Patricia Aufderheide** is University Professor in the School of Communication at American University in Washington, DC.
- **J. Israel Balderas** is a First Amendment attorney and Assistant Professor of Journalism at Elon University. A former television news anchor/reporter in several local markets, as well as a newscast producer at Fox News Channel, he now focuses on media law, press freedom, and broadcast regulation. Affiliation is listed solely for identification and does not imply institutional endorsement.

- **Victor Pickard** is the C. Edwin Baker Professor of Media Policy and Political Economy at the University of Pennsylvania's Annenberg School for Communication, where he co-directs the Media, Inequality & Change Center.
- **Christopher Terry** is an Associate Professor and Cowles Fellow of Journalism, Law and Policy in the Hubbard School of Journalism and Mass Communication at the University of Minnesota. He spent more than 15 years as a producer in commercial radio, and his research agenda includes regulatory and legal analysis of media ownership, internet policy and political advertising. He served as a Thrust Four Research Fellow for the Center for Quantum Networks in 2023 and participated in a broadband access study on tribal lands in conjunction with Minnesota's Center for Transportation Studies in 2024. His media ownership research has been cited by the FCC and in filings with the U.S. Supreme Court. In 2025, Terry completed a service term on the FCC's Communication Equity Diversity Council where he worked on policy solutions for rural broadband deployment.

II. Legal Framework: Section 202(h), the Administrative Procedure Act, *Loper Bright*, and *Zimmer*

A. The APA, *Loper Bright*, and the Commission's Burden

At the outset, we wish to emphasize the burden that the Commission bears in this proceeding. When conducting proceedings pursuant to Section 202(h), the Commission must engage in “reasoned decisionmaking.” *Allentown Mack Sales & Serv., Inc. v. NLRB*, 522 U.S. 359, 374 (1998). That requires a “logical and rational” process by which the Commission reaches its conclusion, including a robust “consideration of the relevant factors.” *Michigan v. EPA*, 576 U.S. 743, 750 (2015); *accord Ohio v. EPA*, 603 U.S. 279, 292 (2024) (explaining that an agency must “offer[] a satisfactory explanation for its action, including a rational connection between the facts found and the choice made” (quotation marks and alteration omitted)). Although the Administrative Procedure Act imposes “no general obligation on agencies to conduct or commission their own empirical or statistical studies,” *FCC v. Prometheus Radio Project*, 592 U.S. 414, 427 (2021), the Commission cannot render a “decision that runs counter to the evidence before the agency,” including empirical evidence presented in comments. *Motor Vehicle Mfrs. Ass’n of the United States, Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983). This arbitrary-and-capricious standard applies equally to regulatory and deregulatory actions. *See id.* at 44.

Moreover, unlike in past proceedings, the Commission will receive no deference on questions of law. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369 (2024). Accordingly, in any judicial review of this rulemaking, a court will “independently interpret the statute”—including the meaning of the public interest under Section 202(h)—“and effectuate the will of Congress,” as well as “ensuring the agency has engaged in reasoned decisionmaking” within the statutory bounds. *Id.* at 395 (quotation marks omitted). Thus, to survive judicial review, it is essential that

any action by the Commission to alter the local broadcast media rules be based on a thorough explanation of how the Commission has understood its traditional public-interest standards and how the evidence of record bears on those factors.

The Commission has long explained that three factors—localism, competition, and viewpoint diversity—are principally relevant to its evaluation of how media ownership rules affect the public interest. *See Prometheus*, 592 U.S. at 418 (collecting sources). Those factors are therefore “an important aspect of the problem” that the Commission cannot ignore. *Ohio*, 603 U.S. at 293 (quoting *State Farm*, 463 U.S. at 43). That is particularly true because the Commission emphasized those factors under the public interest standard long before Congress recodified the Communications Act in the Telecommunications Act of 1996, including by enacting Section 202(h). *See Lorillard v. Pons*, 434 U.S. 575, 580 (1975); *see also Loper Bright*, 603 U.S. at 386 (noting that a contemporaneous agency interpretation of a statute is due “respect”). Congress was undoubtedly aware of the Commission’s longstanding consideration of those factors and expected it to consider them when evaluating the ongoing need for its media ownership rules.

Accordingly, the Commission should maintain its approach of considering all three traditional factors in tandem. For the reasons that follow, each of those factors favors maintaining the current local media ownership rules. Localism, viewpoint diversity, and competition all promote intelligent, informed democratic self-governance in the United States. And because the Commission’s local media-ownership rules promote those three values, and no legitimate empirical evidence exists that economies of scale improve localism or diversity, the rules are manifestly in the public interest for a democratic society.

B. Section 202(h) Does Not Compel Deregulation

Some parties have suggested that Section 202(h) requires the Commission to move only in a deregulatory direction in this and future Quadrennial Reviews. That reading is not compelled by the statutory text. Properly understood, Section 202(h) permits the Commission to retain existing ownership limits and, where the record justifies it, strengthen those safeguards to protect competition, localism, and viewpoint diversity.¹

¹ *See In re 2018 Quadrennial Regul. Rev.-Rev. of the Comm’n’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of the Telecomms. Act of 1996*, Report and Order, 38 FCC Rcd. 12782, 12790–91 para. 12–17 (2023) (explaining that “necessary in the public interest” is a “plain public interest” standard under which “necessary” means “convenient,” “useful,” or “helpful,” and that Section 202(h) creates no “presumption in favor of repealing or modifying the ownership rules,” but instead gives the Commission discretion “to make [the rules] more or less stringent”); *Prometheus Radio Project v. FCC* (“*Prometheus I*”), 373 F.3d 372, 395 (3d Cir. 2004) (“no matter what the Commission decides to do to any particular rule—retain, repeal, or modify (whether to make more or less stringent)—it must do so in the public interest and support its decision with a reasoned analysis”). *See also In re 2022 Quadrennial Regul. Rev.-Rev. of the Comm’n’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of the Telecomms. Act of 1996*, Notice of Proposed Rulemaking, FCC 25-64 para. 12 (rel. Sep. 30, 2025) (reaffirming that Section 202(h) creates no deregulatory presumption and that the Commission has discretion to make its ownership rules “more or less stringent”).

1. The text of Section 202(h) does not create a “loosen-only” obligation.

Section 202(h) directs the Commission to “determine whether any of such rules are necessary in the public interest as the result of competition” and to “repeal or modify any regulation it determines to be no longer in the public interest.” Nothing in that language distinguishes between “tightening” and “loosening.” “Modify” is, in ordinary usage, a bi-directional term: it encompasses making a rule more stringent or less stringent, so long as the resulting framework serves the public interest in light of current competitive conditions. *See, e.g., MCI Telecommunications Corp. v. Am. Tel. & Tel. Co.*, 512 U.S. 218 (1994) (explaining that “‘to modify’ means to change moderately or in minor fashion,” but not specifying in any particular direction).

A contrary reading leads to untenable results. If “modify” meant only “relax,” the Commission would be barred from closing loopholes or addressing new forms of consolidation that emerge between quadrennial reviews. But Congress clearly intended the Commission to address newly arising market circumstances through each quadrennial review. It would also turn a finding that a rule is “necessary” into a one-way lock. If that’s the case, then the Commission could not refine that rule even when experience shows it is under-inclusive or easily circumvented. Neither the text nor the structure of Section 202(h) suggests Congress meant to immobilize the agency in a market where ownership structures and technologies are changing quickly.²

2. *Prometheus* and prior Commission practice reject a deregulatory presumption.

In line with the plain statutory text, the Commission has interpreted Section 202(h) for more than two decades as a mechanism to prevent its ownership rules from “remaining in place simply through inertia,” not as a standing order to dismantle them.³ The Supreme Court in *FCC v. Prometheus Radio Project* embraced that understanding, recognizing that the statute requires the agency to reassess whether its rules continue to serve competition, localism, and viewpoint diversity, but leaving the ultimate calibration to the Commission’s expert judgment. *See* 592 U.S. at 419 (“Section 202(h) establishes an iterative process that requires the FCC to keep pace with industry developments and to regularly reassess how its rules function in the marketplace.”).

Consistent with that reading, the Commission has long rejected the idea that Section 202(h) creates a presumption in favor of repeal or relaxation and has instead recognized its discretion to make its ownership rules “more or less stringent” as the public interest requires.⁴ The Commission should reaffirm that approach in this proceeding.

² *See Prometheus I* at 395 (“...no matter what the Commission decides to do to any particular rule—retain, repeal, or modify (whether to make more or less stringent)—it must do so in the public interest and support its decision with a reasoned analysis.”).

³ *FCC v. Prometheus Radio Project*, 592 U.S. 414, 419 (2021).

⁴ *See In re 2018 Quadrennial Regul. Rev.-Rev. of the Comm’n’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of the Telecomms. Act of 1996*, Report and Order, 38 FCC Rcd. 12782, 12790–91 para. 16–

3. *Zimmer* should not be read as a broad deregulatory command.

Zimmer Radio of Mid-Missouri v. FCC, 145 F.4th 828 (8th Cir. 2025), does not suggest a different interpretation of the public interest standard or require the Commission to take a different approach here. *Zimmer* principally held that before the Commission modifies or repeals a rule under Section 202(h), it must find that the rule as written is no longer in the public interest. *Id.* at 859. It therefore held that the Commission could not permissibly change Note 11 to the Top-Four prohibition after concluding that Note 11 was still in the public interest. *See id.* at 860. In other words, a finding that the current rule was *not* in the public interest was a necessary predicate to trigger the Commission’s authority to repeal or modify the rule. *See id.* That aspect of *Zimmer*, if anything, counsels against loosening the local ownership rules here, because to do so, the Commission would have to find that the current rules are not in the public interest—and, as we have explained, they manifestly are.

Zimmer also suggested that Section 202(h) does not permit the Commission to “tighten” a regulation as part of its quadrennial review. This discussion appears to be dictum, as it was unnecessary to the bottom-line holding in *Zimmer*, and therefore not binding even in the Eighth Circuit. In any event, the Commission should respectfully decline to adopt the reading articulated in this portion of the *Zimmer* opinion, which the court itself noted conflicted with the Third Circuit’s earlier (and correct) interpretation of the statute. *See id.* at 861-62 (disagreeing with *Prometheus I*, 373 F.3d at 394-95). For the reasons set forth above, the Third Circuit’s interpretation adheres to the statutory text and therefore binds the Commission.

4. After *Loper Bright*, courts must adopt the best reading of Section 202(h), not the most deregulatory one.

Loper Bright clarified that courts will no longer defer to an agency’s interpretation of an ambiguous statute. But it did not instruct courts to choose the interpretation that most constrains agency authority. Rather, it requires courts to exercise independent judgment and “effectuate the will of Congress” as expressed in the statutory text. 603 U.S. at 395. In that framework, there is no basis for elevating *Zimmer*’s most aggressive language into a nationwide rule that Section 202(h) is a “loosen-only” provision.

The better reading – textually, structurally, and in light of the Communications Act as a whole – is the one the Commission has applied historically and that the Third Circuit approved in *Prometheus I*: Section 202(h) requires periodic reconsideration of ownership rules against current

17 (reaffirming that Section 202(h) creates no presumption in favor of repealing or modifying the ownership rules and that the Commission may make those rules more or less stringent as the public interest requires); *In re 2022 Quadrennial Regul. Rev.- Rev. of the Comm’n’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of the Telecomms Act of 1996*, Notice of Proposed Rulemaking, MB Docket No. 22-459, FCC 25-64 ¶ 5 (2025) (summarizing that understanding).

competitive conditions. It authorizes the Commission to repeal, relax, or strengthen those rules so that they continue to advance competition, localism, and diversity.

5. The Commission should not treat Section 202(h) as a deregulatory straightjacket in this proceeding.

Even if this Commission ultimately decides in this Quadrennial Review to relax particular limits as a matter of policy, it should not say, or imply, that Section 202(h) forces that outcome. Doing so would, 1) misread the statute, 2) give unnecessary legal weight to the most deregulatory reading of *Zimmer*; and 3) invite future courts to treat deregulation as mandatory, even in a very different record. Instead, the Commission should reaffirm that Section 202(h) does not embody a deregulatory presumption.

The Commission should also make clear that it retains full power, in this and future Quadrennial Reviews, to maintain or strengthen local and national ownership safeguards under Section 202(h) and its general authority in Sections 303 and 309(a) when the evidence shows that consolidation threatens the local news ecosystem on which democratic self-governance depends. That approach gives this Commission all the discretion it needs to adopt whatever policy choices it prefers in this docket, while preserving an accurate reading of Section 202(h) and a robust foundation for judicial review in the future.

III. The Importance of Localism for Democracy

As noted, the Commission has a longstanding commitment to localism in carrying out its statutory authorities. That commitment has been validated by the Supreme Court, *NBC v. United States*, 319 U.S. 190, 203 (1943), and consistently reiterated by the Commission across a variety of proceedings, *see, e.g., In re 2002 Biennial Regul. Rev.-Rev. of the Comm’n’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of the Telecomms. Act of 1996*, 18 FCC Rcd. 13620, 13644 (2003) (“The Commission decided long ago that local station licensees have a responsibility to air programming that is suited to the tastes and needs of their community [T]he airing of local news and public affairs programming by local television stations can serve as a useful measure of a station’s effectiveness in serving the needs of its community.” (citations omitted)); *In re Priority Application Rev. for Broad. Stations that Provide Local Journalism or Other Locally Originated Programming*, 39 FCC Rcd. 468, 490 (2024) (statement of Comm’r Carr) (recognizing the FCC’s “long-standing and statutorily-grounded commitment to localism”).

As we explain below, the local media-ownership rules play a critical role in upholding the value of localism in broadcast media. Media consolidation in local media markets adversely affects the quantity and quality of local news programming available to local communities. In turn, that adversely affects those communities’ ability to participate in public discourse and the political sphere more broadly.

A. Localism and the Importance of Local News for Democratic Self-Governance

Under the United States' federal structure, many important government functions are carried out at the local and state level. The Constitution reserves powers to the states, *see, e.g.*, U.S. Const. amend. X, which historically have devolved to local governments substantial responsibilities across many policy domains. *See, e.g., Brown v. Bd. of Educ.*, 347 U.S. 483, 493 (1954) (“Today, education is perhaps the most important function of state and local governments.”); *Vill. of Belle Terre v. Boraas*, 416 U.S. 1, 13 (1974) (Marshall, J., dissenting) (“[Z]oning . . . may indeed be the most essential function performed by local government, for it is one of the primary means by which we protect that sometimes difficult to define concept of quality of life.”); *United Haulers Ass’n, Inc. v. Oneida-Herkimer Solid Waste Mgmt. Auth.*, 550 U.S. 330, 344 (2007) (recognizing “local government’s vital role in waste management”). As a result, state and local governments are key parts of the democratic experiment. Policy decisions made at the state and local level, such as education curricula, urban planning, health and safety regulations, sanitation, and public safety, have tremendous impacts on Americans’ daily lives.

That devolution of policy responsibility is neither an accident nor a surprise: “The Framers recognized that the most effective democracy occurs at local levels of government, where people with firsthand knowledge of local problems have more ready access to public officials responsible for dealing with them.” *Garcia v. San Antonio Metro. Transit Auth.*, 469 U.S. 528, 575, n.18 (1985) (Powell, J., dissenting) (citing *The Federalist* No. 17, p. 107 (J. Cooke ed. 1961) (A. Hamilton)). Local government can provide greater opportunities for civic engagement than higher levels of government, as citizens do not need to travel as far to participate—whether by voting, making their voice heard in legislative hearings, running for office, or attending a protest.

Local life can impact democracy even beyond policymaking and voting. Knowledge of and participation in community events such as “community concerts, civic meetings, local sports events, and other programs of local consumer and social interest”⁵ can foster social connection between individuals who would not otherwise meet, guarding against loneliness and isolation. Such knowledge and participation can also deepen a sense of commitment to a local community and open individuals’ eyes to new ways of living, building empathy and willingness to serve others. The ability of individuals to participate in their local community thus serves as a safeguard against antidemocratic governance.

In part because of these dynamics, local media have historically played an important role in ensuring an informed electorate. In the early days of the American project, Alexis De Tocqueville described the press as “the power which impels the circulation of political life through all the districts of that vast territory. Its eye is constantly open to detect the secret springs of

⁵ *NBC*, 319 U.S. at 203.

political designs, and to summon the leaders of all parties to the bar of public opinion.”⁶ Because no one can be everywhere at once, local media help citizens learn about the actions and decisions of local entities, including their representative governments.

A robust body of research supports the conclusion that citizens who live in areas with less local news coverage are less engaged, less informed, and less able to participate in the political process. Although members of the House of Representatives operate in part at the national level, local broadcast media have traditionally played a crucial role in reporting on and evaluating what representatives have accomplished for their local district. Voters exposed to less local news coverage are “less able to evaluate their member of Congress, less likely to express opinions about the House candidates in their districts, and less likely to vote,”⁷ suggesting that the accountability of representatives to their constituents decreases as broadcast media becomes less local. Local media coverage has “a mobilizing effect on voters that was comparable to that of expensive campaigns” in state supreme court elections;⁸ local news consumption is a “positive predictor[] of local voting;⁹ and exposure to local television news benefits voters’ knowledge of governors, senators, and non-incumbent candidates for those seats.”¹⁰

Cities and towns with fewer reporters and therefore less local news coverage see fewer people challenging incumbent mayors:

[S]taffing declines are significantly associated with reductions in the number of candidates for mayoral races and increases in victory margins in these races. The data also show suggestive evidence of a positive association between newsroom staffing levels and voter turnout. These findings support our hypotheses that newspaper decline negatively affects citizen engagement and political competition at the local level.¹¹

As one of the authors of the study said by means of explaining the findings, “‘If there’s nobody reporting on or providing information about candidates, about legislation, about how

⁶ Alexis De Tocqueville, *Democracy in America*, Vol. 1 (Henry Reeve, Esq. trans.) (1835), <https://www.gutenberg.org/files/815/815-h/815-h.htm>.

⁷ Danny Hayes & Jennifer L. Lawless, *As Local News Goes, So Goes Citizen Engagement: Media, Knowledge, and Participation in US House Elections*, J. of Pol’s., 448 (2015), https://drive.google.com/file/d/15EoDDiyIAHrCFDWUGpwmUiX90ZPCqE-U/view?usp=drive_link.

⁸ David Hughes, *Does Local Journalism Stimulate Voter Participation in State Supreme Court Elections?*, 8 J.L. & Cts. 95, 119 (2020).

⁹ Min et al., *Voting in Local and National Elections: The Role of Local and National News Consumption and News Media Preference*, Atl. J. of Comm’n, 168 (2022).

¹⁰ Daniel J. Moskowitz, *Local News, Information, and the Nationalization of U.S. Elections*, Am. Pol. Sci. Rev., 121 (2021).

¹¹ Meghan E. Rubado & Jay T. Jennings, *Political Consequences of the Endangered Local Watchdog: Newspaper Decline and Mayoral Elections in the United States*, Urb. Aff. Rev., 1348 (2019).

money is being spent, or the budgeting process, how will people know that they require a quality challenger to unseat an ineffective mayor? ... They don't know the mayor is ineffective!'"¹²

Some so-called "local" media markets can actually serve large areas comprising dozens of municipalities, meaning they cannot provide regular local coverage to all residents living in their markets. Researchers have found that such large-circulation outlets include quantitatively and substantively less political reporting on Congressional representatives than small-circulation outlets that only cover a single Congressional district.¹³ Residents of in-state media markets (e.g., Indiana residents in the Fort Wayne media market) demonstrate more knowledge of their governor and senators than residents who live out of state of their media market (e.g., Ohio residents in the Fort Wayne media market).¹⁴ This lack of access to news reflecting individuals' own polity affects many Americans living on or near the borders of states,¹⁵ particularly in rural areas. These studies point to a need for local communities to have access to broadcast news that is meant for them, which reflects the lives of their residents, and which discusses the issues on which they are responsible for voting, if they are to be able to participate robustly in community life and democracy.

There is also evidence that local news outlets are less likely to miss or ignore key local issues than larger outlets covering broader areas. For example, the *North Shore Leader*, a small newspaper in Long Island, broke the story that then-candidate George Santos was illegally using campaign funds and obfuscating their source prior to his election to the House of Representatives in November 2022.¹⁶ Larger media outlets, such as the *New York Times*, did not run a story on his campaign financing and fraudulent self-representations until more than a month after the election,¹⁷ even though the *New York Times* purports to cover news for the entire New York City metropolitan region, including Long Island (in addition to national and international news). Local media outlets may be more likely to spend time vetting local candidates for office than media sources with expansive areas to cover.

In addition to providing political news, local broadcast media saves lives. During natural disasters and other emergencies, television and radio stations often continue to operate even when

¹² Sarah Holder, *When Local Newsrooms Shrink, Fewer Candidates Run for Mayor*, Bloomberg, Apr. 11, 2019, <https://www.bloomberg.com/news/articles/2019-04-11/as-local-newspapers-shrink-so-do-voters-choices>.

¹³ Hayes & Lawless, *supra* note 6, at 453; see also Patrick Balles, Ulrich Matter & Alois Stutzer, *Television Market Size and Political Accountability in the US House of Representatives*, IZA Inst. of Lab. Econ., 4 (2022), <https://docs.iza.org/dp15277.pdf> ("A citizen who lives in a TV market that only covers between 1 to 4 different districts is about 2.5 to 3 percentage points more likely to know basic facts about his or her representative than a citizen served by a market with between 5 and 9 relevant representatives.").

¹⁴ Moskovitz, *supra* note 10, at 126.

¹⁵ *Id.* at 119.

¹⁶ *Small, Local Paper Uncovered and Reported George Santos Scandal Before November Election*, PBS News Hour, Jan. 9, 2023, <https://www.pbs.org/newshour/show/small-local-paper-uncovered-and-reported-george-santos-scandal-before-november-election>.

¹⁷ Alyce McFadden, *A Timeline of the Rise and Fall of George Santos*, N.Y. Times, Apr. 25, 2025, <https://www.nytimes.com/2025/04/25/nyregion/george-santos-timeline.html>.

other ways of alerting the public to danger are unavailable.¹⁸ Particularly in rural areas, broadcast radio stations may be the only way to communicate with far-flung communities and put them in contact with emergency first responders.¹⁹ Environmental threats, such as tornadoes and wildfires, can have microlocal effects, endangering lives in specific neighborhoods or along particular streets, highlighting the importance of local news that everyone can access, regardless of whether they have power, internet, or cell phone access.

B. Media Consolidation Harms Localism

Consolidation of broadcast stations adversely affects the quantity and quality of local news coverage, thereby weakening local democracy.²⁰ Consolidation changes the incentives to produce news towards a focus on national news that can be produced cheaply and distributed widely.

A leading study on the effects of consolidation of local news providers explains these dynamics well:

Consolidation changes the incentives of news providers, shifting coverage toward the topics that can be distributed in multiple markets rather than those—such as local politics—that are market-specific. Consolidation among conglomerate owners is also correlated with changes in editorial decisions, where the newly consolidated outlets are more likely to produce the content that favors the political and financial interests of their owners (Bailard 2016; Gilens and Hertzman 2000). These content changes influence viewers’ available information about local elections and elected officials, along with the ideological slant of news to which they are exposed. As existing research (DellaVigna and Kaplan 2007; Snyder and Stromberg 2010) has shown, both dimensions of content are consequential for the accountability and preference aggregation functions of elections.

Gregory J. Martin & Joshua McCrain, *Local News and National Politics*, 113 Am. Pol. Sci. Rev. 372, 373 (2019). In other words, consolidation can collapse several media markets into one another, which distorts incentives to create market-specific news coverage that would otherwise exist. *Id.* at 373.

¹⁸ FEMA, Integrated Public Alert & Warning System (IPAWS), <https://www.fema.gov/emergency-managers/practitioners/integrated-public-alert-warning-system/broadcasters-wireless>.

¹⁹ All. Rural Pub. Media, Pillars, <https://ruralpublic.org/pillars/emergency-alerts/>.

²⁰ Here and infra, we answer the Commissions questions on whether looser or eliminated local radio ownership rules would lead to less radio programming, as well as whether consolidation changes the amount of investment in local station operations. See *In re 2022 Quadrennial Regul. Rev.-Rev. Comm’n’s Broad. Ownership Rules & Other Rules Adopted Pursuant to Section 202 of The Telecomms. Act of 1996*, FCC 25-64, 9 para. 21, 12 para. 28 (2025), <https://docs.fcc.gov/public/attachments/FCC-25-64A1.pdf>

The only evidence that the FCC has released itself on whether economies of scale improve localism found that the answer is no.²¹ Agency staff wrote that, “given a fixed cost of producing news content, multi-station owners can spread those fixed costs over more stations by distributing the same content across many localities. This content will be non-local for most localities.”²² As signatory Professor Christopher Terry wrote, this study “empirically demonstrated local ownership of television stations added significant content to local television news broadcasts.”²³

Social science research supports the FCC’s conclusion. Following the consolidation of media ownership through acquisition by Sinclair and other conglomerates, “local TV news becomes significantly more homogeneous” across stations with common ownership, and “references to local companies decrease significantly relative to national economic coverage, consistent with a shift away from local business news.”²⁴ That is, broadcast news stories focused on local businesses, events, and politics are replaced with stories which may be important to people across the United States, but which is not a substitute for high-quality reporting about occurrences most immediately in particular communities. Consolidated broadcast stations are less likely to invest in the expensive work of sending journalists to small towns spread across their markets; following consolidations of TV stations by Sinclair, one study “document[s] significant reductions in news coverage of local firms, consistent with reductions in budgets for local news and substitution of centralized content for local content.”²⁵ Instead, consolidated stations are more likely to receive and recycle stories produced at higher corporate levels.

Studies on the consolidation of other local news outlets (e.g., newspapers) show similar detrimental results for local news reporting and political participation. Stories are shared across outlets with common owners, and these stories are “significantly less local—and discursively more national” than stories produced by and for a single outlet.²⁶ Less populous areas outside of the outlet’s publication city also see less reporting coverage.²⁷ Similarly, private equity companies are less likely to invest in local news coverage than locally owned media outlets. When they purchase

²¹ Here and in what follows, we answer the following request for comment from the Commission on whether consolidation has increased the amount of content created outside of a region, created public interest benefits or harms, or reduced local news and other local content. *See In re 2022 Quadrennial Regu. Rev.-Rev.*, at 12 para. 30.

²² Peter J. Alexander & Keith Brown, *Do Local Owners Deliver More Localism? Some Evidence from Local Broadcast News*, FCC, 2 (2004), <https://transition.fcc.gov/ownership/materials/already-released/doownersdeliver070004.pdf>.

²³ Christopher Terry, Stephen Schmitz & Eliezer (Lee) Joseph Silberberg, *The Score Is 4-0: FCC Media Ownership Policy, Prometheus Radio Project, and Judicial Review*, 73 Fed. Comm’n L. J. 124 (2020) http://www.fclj.org/wp-content/uploads/2021/01/73.1.2_Prometheus-Radio-4-0-FINAL-Proof.pdf.

²⁴ Travis Dyer, Mark Lang & Jun Oh, *Media Conglomeration, Local News, and Capital Market Consequences*, 71 Mgmt. Sci., 6603 (2024); *see also* Martin & McCrain, *Local News and National Politics*, 113 Am. Pol. Sci. Rev. at 381, [local-news-and-national-politics.pdf](#).

²⁵ Dyer, Lang & Oh, *supra* note 24, at 6619.

²⁶ Benjamin LeBrun, Kaitlyn Todd & Andrew Piper, *Buying the News: A Quantitative Study of the Effects of Corporate Acquisition on Local News*, 26(4) New Media & Soc’y, 2191 (2024).

²⁷ *Id.* at 2206.

local outlets, the number of votes in local and state house elections decreases,²⁸ as does the competitiveness of elections; competitive elections, in which voters have options, are a sign of a healthy democracy.²⁹ The effects of such consolidation “may be felt especially strongly for papers at a smaller scale, and which were previously supplying a high degree of local news content.”³⁰ This finding indicates that consolidating hyper local outlets, serving very small areas which are less likely to be covered by other sources of local news, may have the most detrimental effects for local and state-level political participation.

Consolidation can hollow out not only daily news reporting capacity, but also the broader ecosystem of locally relevant public-interest programming, including independently produced documentaries and community-based nonfiction series that stations rely on to inform audiences, contextualize local issues, and meet public affairs obligations. When ownership concentration narrows commissioning and carriage decisions, it may reduce the diversity of locally responsive programming available to communities, even when total hours of “news” appear unchanged.³¹

Eliminating or weakening the local media-ownership rules will therefore harm the Commission’s goal of promoting localism. An environment with fewer locally owned stations and more consolidated broadcast media will see less engaged, less informed, and less active citizens participating in their communities. Conversely, less consolidated local news environment has positive effects for voters’ participation in community and political life, which is clearly in the public interest.

IV. How Viewpoint Diversity and Competition Affect Democracy

The Commission has long recognized the essential public interest benefits of a vibrant environment of viewpoint diversity and a competitive market among broadcast outlets. The FCC is required to examine broadcast ownership by Section 202(h) of the Telecommunications Act of 1996. That section provides:

The Commission shall review its rules adopted pursuant to this section and all of its ownership rules biennially as part of its regulatory reform review under section 11 of the Communications Act of 1934 and shall determine whether any of such rules are necessary

²⁸ Michael Erwins, Arpit Gupta, & Sabrina T. Howell, *Local Journalism Under Private Equity Ownership*, Nat’l Bureau of Econ. Rsch., 19–20 (2023).

²⁹ *Id.* at 21.

³⁰ *Id.* at 33–34.

³¹ For example, see David Crider, *A Public Sphere in Decline: The State of Localism in Talk Radio*, 56(2) J. Broad. & Elec. Media, 225, 228 (2012) (“Radio consolidation has centralized effective media channels, and as Habermas (1998) expected, there has been a pressure toward selection of topics on the supply side. In the case of radio station programming, this pressure is often of a financial nature. Radio companies seeking cheaper programming have turned to syndicated national shows.”)

in the public interest as the result of competition. The Commission shall repeal or modify any regulation it determines to be no longer in the public interest.

“Localism, along with competition and diversity, is a longstanding core Commission broadcast policy objective, which together forms the cornerstone of broadcasting.” and as the Supreme Court recently recognized, “[t]he FCC has long explained that the ownership rules seek to promote competition, localism, and viewpoint diversity by ensuring that a small number of entities do not dominate a particular media market.” *Prometheus*, 592 U.S. at 418.

Viewpoint Diversity Promotes Democracy

The United States has a long and proud history of commitment to viewpoint diversity in the media. From the Founding generation to the present, our nation has recognized that having a multiplicity of independent, vibrant press outlets encourages deeper engagement with the democratic process and creates a more informed electorate.

The nation’s history of encouraging viewpoint diversity in media outlets dates back to the Founding. In Federalist No. 10, James Madison acknowledged that factions in national politics were inevitable due to the wide diversity of interests in society and posited that communication among different interest groups was essential for the nation to ultimately find common ground.³² The Founders understood that a well-informed citizenry was critical to producing and maintaining a successful government.³³ The establishment of the Postal Service was a vital step to realizing that vision of a well-informed public. The United States Post Office was founded in 1775,³⁴ and understanding the importance of the circulation of news, special concessionary rates were implemented for newspapers and similar periodicals.³⁵ By 1783 there were 43 newspapers in print in the United States and by 1814 that number exploded to 346.³⁶ In 1788, George Washington wrote:

I entertain a[] high idea of the utility of periodical Publications: insomuch that I could heartily desire, copies of . . . Magazines, as well as common Gazettes, might spread through every city, town and village in America. I consider such easy vehicles of knowledge, more happily calculated than any other, to preserve the liberty, stimulate the industry and meliorate the morals of an enlightened and free People.

³² Michael Auerback, *Analysis: Federalist No. 10*, EBSCO Knowledge Advantage, (2022), <https://www.ebsco.com/research-starters/communication-and-mass-media/analysis-federalist-no-10#full-article>.

³³ *Newspapers – Key to Successful Government*, Newspaper Publishers, Smithsonian Nat’l Postal Museum, <https://postalmuseum.si.edu/exhibition/america%E2%80%99s-mailing-industry-industry-segments/newspaper-publishers>.

³⁴ About, Postal History, <https://about.usps.com/who/profile/history/>.

³⁵ *Newspapers – Key to Successful Government*, *supra* note 33.

³⁶ *Id.*

George Washington to Mathew Carey, June 25, 1788, in John C. Fitzpatrick, ed., *The Writings of George Washington*, Volume 30 (Washington, D.C.: Government Printing Office, 1939), 7-8. Similarly, the Jacksonian Era saw a massive expansion of newspapers nationwide. Political engagement was increasing nationwide and the government continued to value the spread of news. With printing and papermaking technology advancing, nearly every town and city had a local paper. Towns and cities large enough to host multiple newspapers often found them competing with diverse points of view to expand their circulation and draw new advertisers.³⁷

In 1845 it cost only one cent to mail newspapers within 100 miles, and a half cent more to mail further than that. Small town presses caught a break in 1851 when Congress established free postage for distribution within the county of publication, a preference that lasted until the mid 20th century. By 1900, there were about 12,000 community newspapers. Rural Free Delivery service began as an experiment in 1896, but quickly found its way to towns across the country. As it did, the audience for big city and local newspapers expanded.

Newspapers – Key to Successful Government, *supra* note 33.

Because of the difficulty of quantifying viewpoint diversity, diversity in broadcast ownership has long served as an imperfect, but necessary proxy for diversity of opinion.³⁸ And while the nation has long embraced localism, regional and geographic diversity, and viewpoint diversity as guiding principles in communications policy, translating those principles into results has often been challenging. For example, there remains relatively low minority ownership of broadcast outlets³⁹ This disproportionately low level of minority ownership, when compared to the nation’s population, has come at a cost to viewpoint diversity. Studies have established that minority-owned stations “tend to have more minorities in news and public affairs staff positions than white-owned stations.”⁴⁰ Additionally, research has found that “news teams are significantly more diverse at stations with minorities in leadership positions.”⁴¹ Diverse ownership and staff (across many dimensions) promote viewpoint diversity, because studies show that reporters subconsciously tend to engage in coverage for a relatively tight group of people: 1) their editors, 2) other journalists, 3) their sources, and 4) their close friends and families.⁴² “This instinctive

³⁷ *Id.*

³⁸ James G. Robinson, *The Audience in the Mind’s Eye: How Journalists Imagine Their Readers*, Colum. Journalism Rev., (June 26, 2019), https://www.cjr.org/tow_center_reports/how-journalists-imagine-their-readers.php.

³⁹ Geroge Winslow, *FCC: Women Have Majority Stakes in 10% of Commercial Stations*, TVTECH, (2025), <https://www.tvtechnology.com/news/fcc-women-have-majority-stakes-in-10-percent-of-commercial-stations>.

⁴⁰ Christine Bachen et al., *Diversity of Programming in the Broadcast Spectrum: Is there a Link Between Owner Race or Ethnicity and News and Public Affairs Programming?*, Santa Clara U., (1999), www.fcc.gov/opportunity/meb_study/content_ownership_study.pdf.

⁴¹ Robert J. Richardson, *Local TV Newsroom Diversity: Race and Gender of Newscasters and Their Managers*, J. of Broad. & Elec. Media, (Sep. 14, 2022), <https://www.tandfonline.com/doi/full/10.1080/08838151.2022.2121834?scroll=top&needAccess=true>.

⁴² James G. Robinson, *The Audience in the Mind’s Eye: How Journalists Imagine Their Readers*, Colum. Journalism Rev., (June 26, 2019), https://www.cjr.org/tow_center_reports/how-journalists-imagine-their-readers.php.

bias toward ‘known readers threaten[s] to exclude other, less familiar reader segments, inherently impacting the choices journalists [make] while selecting, reporting and crafting stories.’⁴³ When ownership and staff at media outlets are uniform, they are less likely to be attentive to concerns outside their own areas of familiarity, and so broadcast stations will be fail to reflect the necessary local and regional viewpoint diversity that the FCC aspires to promote.⁴⁴

The trend of decreased viewpoint diversity throughout the broadcast space has far-reaching consequences for democratic engagement for the communities left without diverse coverage.⁴⁵ Research has revealed that voters living in areas with less coverage of their U.S. House representatives are less likely to be able to recall their representative’s name, describe the member of Congress, or accurately rate the representative’s performance.⁴⁶ On the other side of the coin, members of Congress who get less coverage by their local press “work less for their constituencies: they are less likely to stand witness before congressional hearings, to serve on constituency-oriented committees (perhaps), and to vote against the party line.”⁴⁷ Additionally, research has long revealed that robust local journalism buttresses democracy in a wide range of ways, including pushing higher voter turnout, countering polarizing narratives, exposing corruption, and leading to people feeling a strong sense of community.⁴⁸

While some argue that the rise in internet and social media news sources represent increased viewpoint diversity, those sources do not substitute for the important democracy-fostering effects of local broadcast media. Misinformation and propaganda campaigns, including those targeting rural and minority communities run rampant online, making the responsible, accountable check provided by locally owned broadcast media more important than ever. Indeed, in an internet media environment characterized by sophisticated geo-targeting and micro-targeting

⁴³ *Id.*

⁴⁴ Similarly, newsrooms that lack viewpoint diversity show some blind spots that disproportionately impact low-income communities. For example, a Pew study reveals that most Americans who have ever spoken to a local journalist tend to have higher incomes. While 26% of those with incomes of \$75,000 or more have spoken with a local journalist, only 20% of those earning between \$30,000 and \$74,999 and 17% of those making less than \$30,000 have. Elizabeth Grieco, *It’s More Common for White, Older, More-educated Americans to Have Spoken With Local Journalists*, Pew Rsch. Ctr. (May 10, 2019), <https://www.pewresearch.org/short-reads/2019/05/10/its-more-common-for-white-older-more-educated-americans-to-have-spoken-with-local-journalists/>.

⁴⁵ “Our results indicate that the consolidation of the industry substantially raised the average number of multimarket contacts, which induced newspaper companies to differentiate their slant more. As a consequence, the diversity of political viewpoints decreased both within companies and at the local market level, leading to reductions in readership. The findings suggest that increasing concentration of media ownership may have negative implications for democratic processes.” Marcel Garz & Jonna Rckardsson, *Media Competition, Multimarket Contact, and Viewpoint Diversity*, Jönköping Int’l Bus. Sch., CEnSE, and MMTC (Jan. 2024), <https://marcelgarz.com/wp-content/uploads/Competition-and-Diversity-Jan-2024.pdf>.

⁴⁶ James M. Snyder Jr. & David Strömberg, *Press Coverage and Political Accountability*, 18 J. of Pol. Econ., No. 2 (Apr. 2010), <https://www.journals.uchicago.edu/doi/pdf/10.1086/652903>.

⁴⁷ *Id.*

⁴⁸ Teresa Gorman, *New Research Explores Connection Between Democracy and Local News*, Democracy Fund (Oct. 15, 2024), <https://democracyfund.org/idea/new-research-explores-connection-between-democracy-and-local-news/>.

systems,⁴⁹ as well as targeted ads, campaigning, and misinformation to be delivered to users in a given location,⁵⁰ it is even more essential for local broadcast outlets to play their role of informing the local public. Checking, verifying, and challenging such content is just as important to democratic self-governance as monitoring and challenging actions by state and local government officials. Yet with fewer competing stations and more centralized, must-run news segments, the ability of local broadcast news to continue to provide this “accountability check” will erode without diverse local coverage.

The U.S. has a long and proud history of supporting a strong and viewpoint diverse news and media ecosystem. As viewpoint diversity has decreased throughout broadcasting, people have lost access to vital programming to keep them informed and actively participating in the democratic system. This has predictably affected lower-income individuals at a disproportionate rate,⁵¹ but our political process as a whole suffers when viewpoint diversity falls by the wayside. Congressional representatives growing farther from their districts, failing to work for their constituents, and becoming less likely to reach across the aisle is the exact scenario that the Founding generation feared.⁵²

*Consolidation Harms Viewpoint Diversity and Competition*⁵³

Ownership consolidation of local stations fundamentally decreases competition and reduces viewpoint diversity by limiting the points of view being represented in a location and by pricing out competitors. Broadcast consolidation both increases national coverage at the cost of local coverage and incentivizes greater uniformity of coverage in consolidated stations. Specifically, ownership consolidation leads stations to shift coverage to national stories,⁵⁴

⁴⁹ A NATO case study identified geo-targeting being potentially deployed to undermine trust in democratic institutions during the 2019 Indonesian Presidential elections. Nora Biteniece & Kristina Zina-Joy Van Sant, *The Use of Geo-Targeting During Elections*, NATO (2019), https://stratcomcoe.org/pdfjs/?file=/publications/download/5december_geolocation_edited.pdf?zoom=page-fit.

⁵⁰ *Id.*

⁵¹ “‘This is a crisis for our democracy and our society,’ said Penelope Muse Abernathy, visiting professor at Medill and the principal author of the report. ‘Invariably, the economically struggling, traditionally underserved communities that need local journalism the most are the very places where it is most difficult to sustain print or digital news organizations.’” Erin Karter, *As Newspapers Close, Struggling Communities Are Hit Hardest by the Decline in Local Journalism*, Northwestern Now (June 29, 2022), <https://news.northwestern.edu/stories/2022/06/newspapers-close-decline-in-local-journalism>.

⁵² “As recognized by James Madison in Federalist #55, there is no “precise solution” to the question of how big an assembly ought to be . . . Madison did propose an amendment to the Constitution in 1789 that would have established a minimum size for the House. That amendment would have established a minimum size based on an initial ratio of one member for every 30,000,” *How big should the House be? Expanding the House of Representatives, explained.*, Protect Democracy (Jan. 24, 2025), <https://protectdemocracy.org/work/expanding-the-house-of-representatives-explained/>.

⁵³ In this subsection, we answer the Commissions questions on whether broadcast television stations are spurred by competing local stations to produce benefits for consumers, as well as whether and how non-broadcast sources affect broadcast television stations’ ability to produce benefits for consumers. *In re 2022 Quadrennial Regul. Rev.-Rev.*, 11 para. 27.

⁵⁴ “Media consolidation can produce cost efficiencies in the production of news, but these efficiencies are not neutral with respect to the content of news coverage. Consolidation changes the incentives of news providers, shifting

substitute uniform content across multiple stations to reduce production costs,⁵⁵ and shrink the spectrum of ideologically motivated station owners in a heavily consolidated region.⁵⁶ Each of these leads to less variation in broadcast content and ultimately to the broadcast audience's being exposed to fewer viewpoints. Such results diminish the public's engagement with the political process and increase political polarization. Finally, large-scale broadcast consolidation opens up the broadcast space to coercion from regulatory authorities and other parties.

Research into local broadcast consolidation finds that the consolidation process results in representation of fewer diverse points of view for both financial and ideological reasons.⁵⁷ After local stations are purchased by larger national broadcast groups, uniform coverage of national issues tends to increase, regardless of whether local viewers express a preference for more uniform coverage.⁵⁸ Consolidation fundamentally changes the incentives of local broadcast stations because national broadcast groups are financially motivated to shift coverage throughout their network towards topics that can be distributed in multiple markets rather than local issues.⁵⁹ Trending national coverage tends to easily fill this gap, drawing viewers and streamlining coverage.⁶⁰

In addition to a focus on national matters, consolidation, even regional consolidation, tends to lead to uniformity in coverage throughout stations in a broadcast group because such programming can be packaged and distributed in multiple markets throughout a region rather than requiring resources for hyper-specific local programming that cannot be distributed to multiple audiences.⁶¹ This type of uniform content is not necessarily made up of national coverage, it may be regional, but ultimately the uniformity eats into the viewpoint diversity available to viewers. Consolidation can lead to covering news in metro areas only, with the consequence that people in rural areas or counties without large cities do not see their viewpoints or interests reflected in the news. Smaller audiences tend to get overlooked because, in the broadcast market no less than other markets, businesses look to capture the largest market share. "The cost efficiencies of consolidating news production appear to be large enough to make up for net losses in viewership it induces even though consumers on average appear to prefer the more local-focused (pre-Sinclair) mix of coverage to the more national-focused (post-Sinclair) mix, Sinclair management still opted to reduce local heterogeneity in coverage across its stations by substituting centrally-produced,

coverage towards topics that can be distributed in multiple markets rather than those - such as local politics - that are market-specific." *Local News and National Politics*, Martin & McCrain (2018) at 5.

⁵⁵ *Id.* at 4.

⁵⁶ *Id.* at n.23.

⁵⁷ Here and *infra*, we answer the Commissions questions on whether broadcast television stations are spurred by competing local stations to produce benefits for consumers, as well as whether and how non-broadcast sources affect broadcast television stations' ability to produce benefits for consumers. *In re 2022 Quadrennial Regul. Rev.-Rev.*, 11 para. 27.

⁵⁸ *Local News and National Politics*, Martin & McCrain (2018).

⁵⁹ *Id.*

⁶⁰ *Id.*

⁶¹ *Id.*

nationally focused segments for locally-produced content.” *Local News and National Politics*, Martin & McCrain (2018) at 22–24.

Studies have also established that as broadcast markets consolidate, “the relative diversity of the local news content diminishes.”⁶² Market competition forces broadcasters to showcase different points of view to differentiate themselves from their competitors.⁶³ A longitudinal study on newspapers found that “newspapers with a similar profile (elite/popular) are less diverse than newspapers with dissimilar profiles; and (3) newspapers owned by the same media group (concentration of media ownership) are more alike than independently owned newspapers.”⁶⁴ A study established that “television stations in markets with a larger number of stations were not more likely to enter the local news business, probably due to internal financial constraints. However, once they were in, those stations produced more local news programming than their counterparts in smaller markets. This suggests that competition from competing local news providers created some incentives for the provision of local news programming.”⁶⁵

On the other hand, consolidation of media outlets also inherently limits the ability of smaller groups with diverse views across the spectrum to launch and maintain their own stations. Smaller outlets have trouble competing against other larger outlets in the market. Studies have shown that the news coverage format of larger organizations, a broad but less in-depth style of coverage, attracts a larger share of consumer attention relative to the narrower and more in-depth coverage of smaller niche news coverage.⁶⁶ While the shift in emphasis to national stories may make economic sense for a consolidated chain of media outlets, that shift inevitably means that local stories directly affecting the lives of local audiences will go unreported.

Competition and Viewpoint Diversity Decreases Political Polarization

⁶² Peter J. Alexander & Brendan M. Cunningham, *Diversity in Broadcast Television: An Empirical Study of Local News in the United States*, Int’l J. of Media Mgmt. (2004), https://www.researchgate.net/publication/228969100_Diversity_in_Broadcast_Television_An_Empirical_Study_of_Local_News/link/57c024a308ae2f5eb32eb296/download?_tp=eyJjb250ZXh0Ijp7ImZpcnN0UGFnZSI6InB1YmxpY2F0aW9uIiwicGFnZSI6InB1YmxpY2F0aW9uIn19.

⁶³ “This study shows that informational and cultural pro-grams respond to competition by differentiating.” Sora Park, *Competition’s Effects on Programming Diversity of Different Program Types*, Int’l J. on Media Mgmt. (June 2005), https://www.researchgate.net/publication/247507379_Competition's_Effects_on_Programming_Diversity_of_Different_Program_Types.

⁶⁴ Kathleen Beckers et al., *Are Newspapers’ News Stories Becoming More Alike? Media Content Diversity in Belgium, 1983–2013*, Journalism, 20(12), 1665–1683, <https://doi-org.proxy.library.georgetown.edu/10.1177/1464884917706860>. (Original work published 2019)

⁶⁵ Philip M. Napoli & Michael Zhaoxu Yan, *Media Ownership Regulations and Local News Programming on Broadcast Television: An Empirical Analysis*, 51(1) J. of Broad. & Elec. Media (Mar. 2007).

⁶⁶ Tim Meyer, et al., *Competing for Attention on Digital Platforms: The Case of News Outlets*, Strategic Mgmt. J., (Apr. 4, 2024).

Additionally, competition serves to decrease mass polarization.⁶⁷ Varied media and viewpoint diversity modulate partisan reactions, creating a more civil environment conducive to bipartisanship.

We also find that access to more information about the quality of election administration via local news moderates partisan reactions to in-party candidate wins and losses. Access to information on the local conduct of elections can reduce the tendency to respond to election outcomes based on wins and losses for the in-party.

Murat Abus, Kexin Bai, Johanna Dunaway, *Local news, partisanship, and perceptions about election administration*, Electoral Studies, Volume 97, 2025. Studies have shown that voters in in-state media markets (who thereby have access to more reporting on their representatives) are more likely to split their down-ballot tickets from their presidential vote than voters in out-of-state media markets (who have less local political coverage, and are therefore more likely to vote for the party of their choice for president down-ballot).⁶⁸ Consolidation chokes off the information pipeline, channeling identical or highly similar content into regional and local programming and leading voters to more polarized reactions.

Consolidation Reduces Viewpoint Diversity by Throttling Local News Ecosystems

Consolidation of broadcast stations into larger broadcast ownership groups inherently decreases competition and reduces diversity of the content being featured on the consolidated stations. Purchasing smaller broadcast groups leads directly to fewer local journalists,⁶⁹ decreased incentives to devote resources to new or local content, and ultimately viewers having fewer viewpoints to choose from, alienating them from the consolidated options. This all comes at a time when trust in local news is increasing.⁷⁰ The “vast majority of U.S. adults (85%) say local news outlets are at least somewhat important to the well-being of their local community. This includes 44% who say local journalism is extremely or very important to their community.”⁷¹ At the same

⁶⁷ In short, losing a newspaper makes people switch into national news, which means less exposure to local races and more partisan voting. Joshua P. Darr, *Does Local News Reduce Polarization?*, Carnegie Corp. of N.Y., <https://www.carnegie.org/our-work/article/does-local-news-reduce-polarization/>; “Current trends towards national consolidation in TV ownership have worrying implications for the performance of local governments and for mass polarization.” *Local News and National Politics*, Martin & McCrain (2018) at 24.

⁶⁸ Moskowitz, *supra* note 10, at 123.

⁶⁹ Consolidation also reduces employment opportunities for local journalists, phasing out existing jobs. “As media firms use their stations to simply duplicate content, whether in the same market or in another market, the opportunities for local journalism decrease. That is an inescapable certainty because the news selection process is a zero-sum game. If one story is in, then another is out. Duplication is based on economies of scale, not on the public information needs of citizens.” Kressin Powers, *From Local Stations to Nationwide Conglomerates: The High Cost of TV Mega-Merger*, at 32 (Dec. 2025).

⁷⁰ Elisa Shearer et al., *Americans’ Changing Relationship With Local News*, Pew Rsch. Ctr. (May 7, 2024), <https://www.pewresearch.org/journalism/2024/05/07/americans-changing-relationship-with-local-news/>.

⁷¹ *Id.*

time, approximately 69% of U.S. adults say that local journalists in their area are mostly in touch with their community, a 6% increase from 2018.⁷²

In addition, the independent film and documentary sector plays a critical, and often overlooked, role in sustaining viewpoint diversity within local broadcast and public affairs programming. As reflected in FCC comments submitted in July 2025 (Regarding MB Docket No. 17-318 Re: National Television Multiple Ownership Rule) by the Future Film Coalition, the Documentary Producers Alliance, the International Documentary Association, and other public-interest media organizations, independent filmmakers function as a decentralized civic infrastructure which further supply local stations with regional reporting, long-form investigations, and community-rooted storytelling that commercial news operations increasingly lack the capacity or incentive to produce. These independently produced works expand the range of voices and experiences represented on local airwaves, particularly for rural communities, communities of color, and regions already facing severe local news deficits. Policies that accelerate broadcast consolidation without corresponding safeguards risk severing this relationship, diminishing the availability of independent regionally-produced content, and further eroding the diversity of opinion that the Communications Act and longstanding FCC precedent identify as core to the media in the public interest.

Existing Consolidation Has Already Shown Negative Implications for Democracy and Viewpoint Diversity

Finally, the current levels of local ownership consolidation already open up the field to potential improper pressure and coercion, whether intentional or perceived. For example, recent comments by Chair Carr about Jimmy Kimmel, may have factored into Sinclair and Nexstar temporarily dropping Kimmel's show from the air in every one of the markets where it had an ABC affiliate.⁷³ Neither company took into consideration the culture or social mores of those local communities – they pre-empted the Kimmel show everywhere from Dothan, Alabama to Washington, DC.

Consolidation also increases the risk that media outlets will become vulnerable to improper pressure and coercion, whether intentional or perceived. For example, recent comments by Chair Carr about late-night host Jimmy Kimmel may have factored into the decision by Sinclair and Nexstar to temporarily drop Kimmel's show from the air.⁷⁴ Further consolidation would make broadcasters even more susceptible to perceived or actual pressure from the government. By contrast, in a truly diverse and independent media environment, broadcasters as a whole are likely to be more resilient; and even if some broadcasters pull their punches in

⁷² *Id.*

⁷³ David Folkenflik, *Jimmy Kimmel's Suspension Shows Power of FCC's Brendan Carr*, NPR (Sep. 19, 2025), <https://www.npr.org/2025/09/19/nx-s1-5546764/fcc-brendan-carr-kimmel-trump-free-speech>.

⁷⁴ *Id.*

response to governmental overreaching, there will remain other outlets that do not do so. But as media ownership becomes more consolidated, it also becomes easier for the government to dampen coverage that it does not like, leaving fewer outlets open for dissenting viewpoints. That result is fundamentally antithetical to the public interest and to the values that the Commission has traditionally sought to promote.

V. Non-Broadcast Media Do Not Provide Adequate Substitutes For A Vibrant Local Broadcast Ecosystem⁷⁵

Broadcasters are licensed and legally required to serve their local communities, a mandate that proves essential given the deepening crisis in local news and the failure of new media to serve as an adequate substitute. This section first details the continued reliance of the American public, particularly certain demographic groups, on broadcast media for essential information. Second, it highlights the critically low local news environment across the country, and particularly in rural and tribal areas facing the dual challenge of news scarcity and inadequate broadband access. Finally, it demonstrates how new media have failed to fill the growing void in comprehensive local journalism, showing why a robust broadcast system is needed.

Americans Still Rely on Broadcast Media For Local News and Information

Many Americans use and rely on broadcast media for essential news and information. Broadcast television continues to be a primary source for news, with a majority (64%) of Americans reporting they get news from television at least sometimes, including 32% who say they *often* get news from television, a figure that has remained relatively steady.⁷⁶ Furthermore, consumer viewership of live television remains high at 72%.⁷⁷ While radio use has declined, 54% of Americans report listening to live radio at least three times a week,⁷⁸ and 44% report getting news often or sometimes from radio—almost 20 percentage points higher than the number that get news from newspapers and printed sources.⁷⁹ The reliance on broadcast media is particularly pronounced for certain demographic groups; for example, 69% of people with a high school degree or less often or sometimes get their news from television, compared to 58% of college-educated individuals.⁸⁰ For radio, roughly 37% of middle aged audiences and 36% of audiences over 50

⁷⁵ This section responds to the Commissions' questions on whether broadcast television and radio continue to serve the public, and whether non-broadcast audio and video entities provide local programming. *See In re 2022 Quadrennial Regul. Rev.-Rev.*, 8 para.16, 10–11 para. 25, 12 para. 28, <https://docs.fcc.gov/public/attachments/FCC-25-64A1.pdf>

⁷⁶ Jacob Liedke & Luxuan Wang, *When Americans Say They Get News From TV, What Do They Mean?*, Pew Rsch. Ctr. (Nov. 20, 2025); Pew Rsch. Ctr., *News Platform Fact Sheet* (Sep. 25, 2025), <https://www.pewresearch.org/journalism/fact-sheet/news-platform-fact-sheet/>.

⁷⁷ *US Media Consumption Report*, Attest, at 3 (2025), https://www.askattest.com/wp-content/uploads/2025/07/US-Media-consumption-report-2025_digital-v2.pdf

⁷⁸ *Id.*

⁷⁹ Pew Rsch. Ctr., *When Americans Say They Get News from TV, What Do They Mean?*; Pew Rsch. Ctr., *News Platform Fact Sheet* (Sep. 25, 2025).

⁸⁰ *Id.*

years old listen to the radio daily, as compared to only 15% of those under 30.⁸¹ This continued reliance underscores the value of broadcast television and radio, which are mandated to provide free, 100% coverage and local content, filling an essential public service role that alternative platforms do not match.

Weak Local News Environment

The need for a strong local broadcast ecosystem is amplified by the already weak local news environment across the country. A significant portion of the American public—some 50 million Americans—have limited to no access to local news.⁸² As of 2025, the number of “news desert” counties rose to 213, and another 1,524 counties have only one remaining news source.⁸³ This leaves many communities with insufficient local news options. Until recently, public broadcasting, including nearly 300 public radio stations and over 100 public television stations, has been crucial in informing listeners about local issues—with their signals reaching into 82% of news desert counties and 90% of single-source counties (when repeaters are included).⁸⁴ In nine counties, a public broadcasting station is the sole source of local news.⁸⁵ But with the ending of federal funding for public media, it is far from clear that public media can continue to play that role, especially in areas that are otherwise underserved by local news outlets. The ongoing lack of local news options means that any further consolidation of broadcast ownership will only exacerbate the existing information deficits, leaving many communities more vulnerable.

The Widening Information Divide in Rural America

Rural areas in the United States are disproportionately affected by the decline in local journalism, leading to a widening information divide. As of 2025, a stark pattern persists where almost 80% of all designated news deserts—counties with limited or no local news coverage—were located in areas the U.S. Department of Agriculture (USDA) classifies as predominantly rural.⁸⁶ The growth of digital-only news outlets is not mitigating this issue, as these new sources tend to be established in and serve urban populations. Fewer than 10% of these digital-only news outlets are situated in USDA-designated rural counties.⁸⁷ Furthermore, the demographic profiles of counties supporting digital sites are nearly the opposite of news deserts: the former are typically more affluent, with lower rates of poverty and higher rates of educational attainment.⁸⁸ Financial

⁸¹ *US Media Consumption Report*, at 13–14 (2025).

⁸² Medill Local News Initiative at NW U., *News Deserts Hit New High and 50 Million Have Limited Access to Local News, Study Finds* (Oct. 2025), <https://www.medill.northwestern.edu/news/2025/news-deserts-hit-new-high-and-50-million-have-limited-access-to-local-news-study-finds.html>

⁸³ Medill Local News Initiative at NW U., *The State of Local News 2025* (Oct. 2025), <https://localnewsinitiative.northwestern.edu/projects/state-of-local-news/2025/report/#local-news-landscape>.

⁸⁴ *Id.*

⁸⁵ *Id.*

⁸⁶ *Id.*

⁸⁷ *Id.*

⁸⁸ *Id.*

support aimed at bolstering local journalism largely bypasses these struggling rural areas; over the past five years, 95% of journalism grants and 98% of grant dollars were distributed to organizations located in urban areas.⁸⁹

This growing disparity is exacerbated and, in part, explained by the underdeveloped technological infrastructure in rural communities. For residents of the 212 news desert counties, fewer than half, on average, have access to the fastest speeds of terrestrial internet connectivity, according to the latest data from the Commission.⁹⁰ In 20% of these counties, fewer than 10% of residents can access the internet at these high speeds.⁹¹ More broadly, 29% of residents in rural areas lack home broadband internet, a figure nearly double the 16% of suburban residents without it.⁹² This infrastructural barrier is compounded by the financial cost of access, with home internet prices ranging from \$20 to \$300 per month, averaging around \$65 per month.⁹³ This cost makes broadband access prohibitive for many low-income households, as only 54% of individuals with an annual income of less than \$30,000 have broadband, compared to 75% of those making between \$30,000 and \$69,999.⁹⁴ These dual disparities—the lack of a local news source and limited internet connectivity—place rural residents on the edge of a significant and expanding information divide.⁹⁵

The recent reduction in funding for public radio is poised to deepen this information gap further, especially in rural areas that rely heavily on this service. Studies have indicated that radio stations with a greater dependence on federal funding are often those “located in poorer, more rural areas.”⁹⁶ For example, among the 24 counties with stations that receive more than 40% of their funding from federal sources, half are classified as very rural.⁹⁷ These stations now face a significant “dual challenge: A large percentage of their funding has vanished, and they cannot make up the deficit through audience or local business donations, as stations in more urban areas might be able to do.”⁹⁸

⁸⁹ *Id.*

⁹⁰ *Id.*

⁹¹ *Id.*

⁹² Pew Rsch. Ctr., *Internet/Broadband Fact Sheet* (Nov. 20, 2025), <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>.

⁹³ Brean Horne, *How Much Does Internet Cost Per Month*, FORBES (Mar. 28, 2025), <https://www.forbes.com/home-improvement/internet/internet-cost-per-month/>

⁹⁴ Pew Rsch. Ctr., *Internet/Broadband Fact Sheet* (Nov. 20, 2025).

⁹⁵ Medill Local News Initiative at NW U., *The State of Local News 2025*, *supra* note 83. The digital divide is also present with regard to race: 81% of white adults report having broadband compared to 71% of Black adults and 68% of Hispanic adults. Pew Rsch. Ctr., *Internet/Broadband Fact Sheet*, *supra* note 94.

⁹⁶ Medill Local News Initiative at NW U., *The State of Local News 2025*, *supra* note 83.

⁹⁷ *Id.*

⁹⁸ *Id.*

The issue is particularly acute for tribal areas. Tribal areas lag almost 20 percentage points behind nationwide averages in broadband internet access.⁹⁹ One tribal radio station, KSUT, serves the entire Four Corners area, from the Southern Ute reservation outside of Durango, to Navajo Nation and Jicarilla Apache in New Mexico.¹⁰⁰ “KSUT airs public radio and television programs and broadcasts bilingually in English and Yup’ik, which many elder residents speak as a first, or only, language.”¹⁰¹ KSUT received 20% of its budget, or around \$330,000 annually, from the Corporation for Public Broadcasting, which is shuttering due to funding cuts.¹⁰² KSUT, alongside many other radio stations are scrambling, and the stakes are dire. Radio remains one of the best forms of emergency communication for these regions. As one resident stated: “When you’re out on the rez and you have no internet and you’re trying to figure out ‘this flash flood, can I cross safely?’ The only way you can get that information is through your local community tribal-serving station.”¹⁰³

New Media Do Not Replace Local Journalism

The introduction of new media options has not provided an adequate replacement for comprehensive local journalism. Data suggests that new online outlets have not significantly added to local news diversity; instead, local news consumption on the web largely involves consuming less content from the same established media sources.¹⁰⁴ One study found that out of 1,074 identified online local news sources, only seventeen were genuinely new media outlets rather than online versions of print or broadcast media.¹⁰⁵ Furthermore, only a small fraction of the top markets have an unaffiliated internet news source that reaches a significant audience threshold.¹⁰⁶ While the number of independent digital-only sites has grown to 662 as of the 2024 State of Local News Report (a net increase of 81 from the prior year), this growth has not kept pace with the staggering loss of traditional newspapers.¹⁰⁷ Importantly, the original concern persists: many of

⁹⁹ Daniela Mejia, *American Indian and Alaska Natives in Tribal Areas Have Among Lowest Rates of High-Speed Internet Access*, America Counts, U.S. Census Bureau, <https://www.census.gov/library/stories/2024/06/broadband-access-tribal-areas.html>

¹⁰⁰ Ilana Newman, *Public Media Cuts Will Hurt Rural Americans*, The Daily Yonder (July 21, 2025), <https://dailyyonder.com/rescissionsactwillhurtruralamericans/2025/07/16/#:~:text=by%20Ilana%20Newman%2C%20The%20Daily,the%20only%20form%20of%20transportation.>

¹⁰¹ *Id.*

¹⁰² *Id.*

¹⁰³ *Id.*

¹⁰⁴ Matthew Hindman, *The Internet Trap: How the Digital Economy Builds Monopolies and Undermines Democracy*, Princeton U. Press 105 (2018).

¹⁰⁵ *Id.* at 115–16.

¹⁰⁶ *Id.* at 128 (“Only sixteen of our top one hundred markets have an unaffiliated internet news source that reaches our 1-percent audience threshold.”).

¹⁰⁷ Medill Local News Initiative at NW U., *The State of Local News 2022*, <https://localnewsinitiative.northwestern.edu/research/state-of-local-news/2022/report/>; Medill Local News Initiative at NW U., *The State of Local News 2024 Report*, <https://localnewsinitiative.northwestern.edu/projects/state-of-local-news/2024/report/>.

these digital sites are hyper-focused on single topics such as education or politics, failing to provide a broader slate of general local news, and most of them employ six or fewer full-time reporters.¹⁰⁸

Non-broadcast media also fail to substitute for broadcast's role in preserving and providing access to local civic memory. Independent filmmakers, journalists, educators, and historians rely on local broadcast archives and station partnerships to document community history and hold institutions accountable. As reflected in FCC comments submitted in July 2025 by the Archival Producers Alliance (Regarding MB Docket No. 17-318; Re: National Television Multiple Ownership Rule), consolidation can place fragile and often undigitized local news archives further out of reach, increasing the risk of neglect, loss, or prohibitively expensive access. These harms cannot be remedied by digital platforms, which lack both public-interest obligations and incentives to steward local historical assets.

VI. Recommended Course for Further Research

The Commission seeks comments on whether consolidation has produced verifiable public interest benefits. *See In re 2022 Quadrennial Regul. Rev.-Rev.*, p. 17, para. 30.¹⁰⁹ The Commission also seeks to understand the impact that new forms of media and the internet have had on broadcast radio and television.¹¹⁰ However, as it stands, the Commission lacks current, rigorous empirical data to support the proposition that economies of scale improve localism or viewpoint diversity, or to fully and accurately assess the impact of new media on the traditional local broadcast market. At a minimum, before the Commission takes any action that would loosen the current local broadcast ownership rules, the Commission should do the following:

1. Audit of Past Merger Commitments

Before considering any further deregulation, the Commission should conduct a comprehensive retrospective audit of existing consolidated media markets. This analysis should determine:

¹⁰⁸ *The State of Local News 2024 Report*, supra note 107 (Data showing the difficulty for many non-print outlets to overcome the staff deficit caused by losses in print news, reinforcing the issue of limited staff).

¹⁰⁹ *See In re 2022 Quadrennial Regul. Rev.-Rev.*, 17 para. 30 (“Are there metrics that suggest consolidation has resulted in more of better local news? Is there evidence that shows that prior actions by the Commission to loosen or eliminate ownership restrictions resulted in more or better local news, in a way that might help inform what might occur in the broadcast market?”).

¹¹⁰ *See e.g., id.* at 10 para. 14 (“Although this is not entirely a new phenomenon, and the broadcast radio industry has witnessed the arrival of new forms of media and technology in the past, does competition exist among the digital media platform field and the radio broadcasting industry? Do online audio and other media platforms compete directly with broadcast radio today?”); *id.* at 14, para. 4 (seeking comment on “whether the Local Television Ownership Rule is necessary in the public interest as a result of competition, notwithstanding substantial changes that have occurred in the video marketplace with changes in technology (including online video, and digital television broadcasting) and the challenges now facing the broadcast television industry.”).

- Whether any of the public interest “benefits” (e.g., improved local news quality, increased resources) promised by licensees during past ownership merger proceedings were ever realized.
- Whether the agency ever undertook systematic verification of these ex ante promises post-merger.

This accountability analysis is a necessary precondition for assessing the true impact of ownership consolidation.

2. Study on Media Substitutability and Localism

The Commission should initiate a new round of Media Ownership Working Group Studies to measure media substitutability, local news production, and impacts to content diversity of local news after mergers. This research program could include:

- A quantitative and qualitative analysis of local news production and its resource allocation pre- and post-merger.
- An empirical study on the effects of mergers on local content diversity across broadcast newscasts, including the range of viewpoints presented.

A study of this kind could be executed in less than four months with modest funding.

VII. Conclusion

Retaining the local media-ownership rules is essential to safeguarding the fundamental value of localism in broadcast media. Media consolidation is a direct threat to the public interest, demonstrably reducing both the quantity and quality of local news programming, while simultaneously limiting viewpoint diversity by decreasing market competition. This erosion directly undermines a community’s ability to engage in informed public discourse and participate effectively in the political sphere. The pattern of ownership consolidation prioritizes national coverage at the expense of local content and incentivizes harmful uniformity across stations. Crucially, new media options do not provide adequate or equitable substitutes for a vibrant local broadcast ecosystem. For all the reasons detailed in this comment, the Commission must maintain the existing local media-ownership rules. Absent compelling evidence that revision would meaningfully enhance localism or diversity—evidence that is currently lacking—any change to these rules risks irreparable harm to the local broadcast ecosystem and the vital civic function it serves.

Respectfully submitted,

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