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

In the Matter of	)	
	)	
Broadcast Localism	)	MB Docket No. 04-233
	)	

To the Commission

STATEMENT OF FREDRICK HOLT, Ph.D
IN RESPONSE TO THE REPORT ON BROADCAST LOCALISM AND
NOTICE OF PROPOSED RULEMAKING

Fredrick Holt, Ph.D
Research Economist
ERS Group
Suite 810
2100 M Street, NW
Washington, DC 20037
202-328-1515 (x507)
rholt@ersgroup.com

May 8, 2008

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I. Summary and Background

Fredrick Holt, PhD. (a representative of ERS Group) respectfully submits this declaration in response to the Report on Broadcast Localism and Notice of Proposed Rulemaking ("Localism NPRM")[1], which seeks comment on certain changes to the Commission's rules and policies in an effort to promote both localism and diversity. The analyses contained within this document were requested by the Minority Media and Telecommunications Council ("MMTC").

I am a Research Economist at ERS Group in Washington, D.C. ERS Group is a consulting and research firm whose professionals work with individuals, government agencies, universities, corporations and other businesses to analyze employment decision-making processes. My primary fields of research are in the area of econometrics and employment discrimination. A detailed list of my credentials is provided in Appendix A of this declaration.

For this declaration I was requested to analyze data that speaks to the potential impact of reverting to the pre-1980s main studio rule on cluster owners classified as minority owned and ethnic programming.[2] Using data provided by MMTC, I evaluated two metrics that measure the burden associated with reverting to the pre-1980s main studio rule and how these two metrics vary across cluster owners. Using two separate statistical methodologies, I found that - on average - the burden imposed on minority owned and ethnic programming cluster owners was higher than the burden imposed on cluster owners not in either of these subsets and that the differences are statistically significant.

The remainder of this declaration is organized as follows. Section II reviews the data provided for the analyses. Section III lays out the key definitions used and questions addressed

[1] Broadcast Localism, Report and Notice of Proposed Rulemaking, MB Docket No. 04-233, 23 FCC Rcd 1324 (2007) ("Localism NPRM").

[2] Id. at 1343-44 ¶ 41.

in my analysis. Sections IV and V discuss methodology and results for a t-test analysis and regression analysis. I provide concluding comments in Section VI.

II. Data

The data provided to me contains information on the 458 cluster owners for the top 50 ranked radio markets in 2007. In particular – the data included the following information for each cluster:

Market Rank

Market Name

Market Size (population)

Cluster Owner

Number of Stations

Number of Stations in Largest COL in Market

Number of Other COLs

Number Studios Required

Minority Ownership Status.

The field "Number Studios Required" is interpreted as the number of different COLs (Community of License), each with at least one station owned by the cluster owner licensed to it (tracking the FCC's proposal to revert to its pre-1987 rule under which each station was required to have a main studio in its community of license). The field Minority Ownership status takes on three values. Non-minority owners who are not exclusively ethnic or multilingual programming specialists take a value of 1. Non-minority owners who are exclusively ethnic or multilingual

programmers take a value of 2. Minority owners (including Glades Media, West Palm Beach)[3] take a value of 3.

Two data related documents appear as appendices to this declaration. A printed version of the actual data table may be found in Appendix B. A copy of a "Database Assumptions" document – which was provided with the data – is found in Appendix C. This additional document provides further detail on the field definitions.

III. Analysis Questions

I chose to evaluate the potential impact of reverting to the pre-1980s main studio rule using two metrics. First, I calculated the ratio of Stations in Largest COL to Total Stations. This ratio is bounded by zero below and one above. The larger the calculated value for of this ratio – the less impacted clusters will be by the impacted rule change. Second, I calculate the ratio of Total Stations to Number of Studios Required (under the proposed rule). This ratio is bounded below by 1. The smaller the calculated value for this ratio – the less impacted clusters will be by the impacted rule change.

I contrasted the values for these metrics using three different partitions of the set of available clusters in the data.

1. Non-Minority[4] vs (Ethnic or Minority)
2. Non-Minority vs Ethnic Programming
3. Non-Minority vs Minority Owned

[3] The minority party for Glades Media, West Palm Beach has negative (50%) control. This cluster is considered minority owned for the purposes of these analyses.

[4] Non-Minority is defined as all clusters that are neither minority owned nor ethnic programming.

These alternate partitions allow me to separately measure the impact of the proposed rule change on minority owned and ethnic programming clusters and get at an overall effect on the two groups.

IV. T-Test Analysis

To measure the impact of the FCC's proposal on minority owned programming clusters, I used a t-test analysis. A t-test compares the average of a variable for one group against the average of that variable for a different group and determines if there is a statistically significant difference between the groups. If the probability of the difference in averages occurring by random chance is 5% or lower, then that result is considered statistically significant. This corresponds approximately to a 2.0 standard deviation threshold in absolute value.

As indicated above, I ran t-tests using two metrics of interest:

1. COL Ratio: Stations in Largest COL / Total Stations
2. Studio Ratio: Total Stations / # of Studios Required

For each metric of interest, I ran three separate t-tests – once for each of the above described partitions of the set of clusters based on minority ownership and or ethnic programming status. Therefore, there are a total of six t-tests.

t-test Result Summary

Proportion	Cluster Partition	Minority Ethnic Average Proportion	# Non-minority Non-Ethnic Proportion	Difference in Proportions
COL ratio	(Ethnic programming or minority owned) v. Non-minority	0.2243	0.3688	-0.1444
COL ratio	Ethnic programming v. Non-minority	0.2484	0.3688	-0.1203
COL ratio	Minority owned v. Non-minority	0.2106	0.3688	-0.1581
Studio ratio	(Ethnic programming or minority owned) v. Non-minority	1.2335	1.6260	-0.3925
Studio ratio	Ethnic programming v. Non-minority	1.2285	1.6260	-0.3976
Studio ratio	Minority owned v. Non-minority	1.2364	1.6260	-0.3896

The above table summarizes the results of the t-tests. A detailed version of these results can be found in Appendix D. With respect to the COL Ratio – the difference in the mean value between the different minority owner / ethnic programming clusters and the other clusters varies between -0.1581 and -0.1203. So – on average – minority owner / ethnic programming clusters have between a 12% and 16% smaller share of their total stations in the largest COL. With respect to the Studio Ratio - the difference in the mean value between the different minority owner / ethnic programming clusters and the other clusters are all right around -0.39. This means that – on average - minority owner / ethnic programming clusters have more than a third fewer stations per required studio. All of these differences are highly statistically significant and they all suggest that minority owner / ethnic programming clusters will be disproportionately impacted by the proposed reversion to the pre-1980s main studio rule.

V. Regressions

In order to examine the impact of the FCC's proposal in greater detail, I estimated a set of regression models.[5] The regression analysis allows me to control for variation in other factors when examining the relationship between the two metrics of interest and the three partitions of the clusters based on minority ownership / ethnic programming status.

As with the t-tests – six separate analyses are conducted. Three models are estimated with the COL Ratio as the dependent variable and three models are estimated with the Studio Ratio as the dependent variable. All six models include the population of the market as an independent variable.[6] Including this new control allows me to address the concern that the t-test results were merely driven by differences in the distribution of market size by different partitions of the clusters. Within each set of three models – one of the following three indicator variables is included as an independent variable:

1. Ethnic Programming or Minority Owned
2. Ethnic Programming
3. Minority Owned

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[5] It was necessary to estimate these regression models using Censored Regression techniques – instead of regular Ordinary Least Squares. This is because the dependent variables in both analyses are censored. In particular – the ratio Stations in Largest COL / Total Stations is censored from below at 0 and from above by 1 and the ratio Total Stations / # of Studios Required is bound from below by 1.

These censored regressions were estimated using "proc lifereg" in the statistical software package called SAS. See the SAS manual for a more detailed discussion of censored regression methods - Chapter 36, The LIFEREG Procedure, pp. 1761-1796, SAS Institute Inc., SAS/STAT® User's Guide, Version 8, Cary, NC: SAS Institute Inc., 1999.

[6] I also included a quadratic population term to account for possible non-linearities in the effect of population on the metrics.

The estimated coefficients associated with these indicators measure the marginal impact – other factors held constant of a cluster's minority ownership/ethnic programming status on the two metrics of interest.

Regression Result Summary

Dependent Variable	Minority-Ethnic Control	Minority-Ethnic Coefficient Estimate
COL ratio	Ethnic programming or minority owned	-0.3073
COL ratio	Ethnic programming	-0.2292
COL ratio	Minority owned	-0.3574
Studio ratio	Ethnic programming or minority owned	-1.2062
Studio ratio	Ethnic programming	-1.2561
Studio ratio	Minority owned	-1.1712

The above table summarizes the results of the regressions. A detailed version of these results can be found in Appendix D. With respect to the COL ratio – the estimated marginal impact of minority ownership / ethnic programming ranges from -0.229 to -0.357. That means that – holding market size constant – the share of minority owned and or ethnic programming stations in the largest COL is cluster is 22% to 36% lower than the corresponding share for clusters not part of either of these groups. These estimated effects are statistically significant (for the combined minority owner / ethnic programming group and for the minority owned group) or borderline significant (for the ethnic programming group. With respect to the Studio Ratio - the estimated marginal impact of minority ownership / ethnic programming ranges from -1.25 to -1.17. That means that – holding market size constant – minority owned / ethnic programming stations have around 1 and a quarter fewer stations per required studio. The estimated effects on

the minority owned/ ethnic programming controls are all strongly statistically significant. These regression results make clear that – even after controlling for market size - minority owned and ethnic programming clusters bear a disproportionate burden associated with the proposed reversion to the pre-1980s main studio rule.

VI. Conclusions

I was asked by MMTC to analyze the potential impact of the potential impact of reverting to the pre-1980s main studio rule on cluster owners classified as minority owned and ethnic programming. MMTC provided me data on the 458 clusters in the top 50 ratio markets. I then used t-test and regression methods to look at possible disparate impact of the proposed rule on minority owned and/or ethnic programming cluster.

I found evidence that the proposed reversion to the main studio rule of the early 1980s appears to be neither fair, efficient, nor equitable for minority owned and ethnic programming clusters. In particular – I found that minority owned and ethnic programming clusters have a smaller share of stations in the largest COL and fewer stations per studio required relative to the clusters not in these two categories. I found that these differences are relatively large, statistically significant, and that they hold up when one controls for market size. These calculations suggest that minority owned and ethnic programming clusters will face a much higher burden meeting the proposed reversion to the pre-1980s main studio rule.

Respectfully submitted,

Fredrick Holt
Research Economist
ERS Group
Suite 810
2100 M Street, NW
Washington, DC 20037
202-328-1515 (x507)
rholt@ersgroup.com

May 8, 2008

Appendix A

ERSGroup
A SOURCECORP COMPANY

Washington, DC
Suite 810
2100 M Street, NW
Washington DC 20037
(202) 328-1515
(202) 462-0594 FAX
http://www.ersgroup.com

FREDRICK M. HOLT

2100 M Street, NW, Suite 810 • Washington DC 20037 • (202) 328-1515
rholt@ersgroup.com

PROFESSIONAL EXPERIENCE:

ERS GROUP

• Research Economist (2002 - present)

Design and conduct statistical analyses of alleged employment discrimination and the valuation of economic losses with emphasis in the area of labor economics. Prepare expert testimony associated with these analyses. Implement systems to monitor employment practices.

BATES WHITE BALLENTINE, LLC

• Manager (2000-2002)

Develop and implement statistical models for the purpose of antitrust related damages estimation and financial services related fraud detection. Prepared expert testimony associated with these analyses.

KPMG, LLP

• Manager (1999-2000)

Design and construct models to examine a variety of lending decisions as they relate to race and gender and put in place monitoring systems associated with these decisions. Participated in large studies of the radio broadcast licensing process and veterinary labor market; each with a focus on race and gender issues. Assisted in the development, implementation, and processing of statistically valid surveys.

• Senior Consultant (1998-1999)

U.S. CENSUS BUREAU

• Economist (1997-1998)

Assisted in the development and implementation of the Medical Expenditure Panel Survey, a major survey of employer provided health insurance.

UNIVERSITY OF VIRGINIA

• Data Consultant (1994-1997)

Assisted faculty and students in manipulating and obtaining extracts from large data sets. Required knowledge of a wide ranging set of data sources and data processing and statistical analysis software packages.

• Instructor, University of Virginia (1992-1994)

Taught 'Introduction to Statistics' to classes of 50 to 100 students for the Department of Economics. Generated and presented lectures; wrote and graded homework assignments and exams exams.

• Teaching Assistant (1991-1993)

Taught discussion sessions for 'Principals in Economics', 'Graduate Statistics', and 'Graduate Econometrics'. Prepared lectures and homework assignments.

EDUCATION:

Ph.D., Economics, University of Virginia, 1997

M.A., Economics, University of Virginia, 1992

B.S., Industrial Management, Purdue University, 1990

HONORS AND AWARDS:

Green Fellowship, 1995-1997

IBM Shared University Research Grant, 1994-1996

Academic Enhancement Program Fellowship, 1990-1993

Academic Enhancement Program Summer Research Fellowship, 1991

SPECIALIZATION:

Econometrics, Labor Economics, Statistics.

PUBLICATIONS AND RESEARCH PAPERS:

Reply to "Comments on 'The Use of Attrition Rates for Economic Loss Calculations in Employment Discrimination Cases: A Hypothetical Case Study,'" (with Josefina V. Tranfa-Abboud and Paul White) Journal of Forensic Economics, Vol. XVIII, No. 1.

"The Use of Attrition Rates for Economic Loss Calculations in Employment Discrimination Cases: A Hypothetical Case Study," (with Josefina V. Tranfa-Abboud and Paul White) Journal of Forensic Economics, Vol. XVI, No. 2, Spring/Summer 2003 (Published September 2004).

"Survival Models of Community Tenure for the Seriously Mentally Ill: A Ten-Year Perspective," with Steve Stern and Elizabeth Merwin, Health Services and Outcomes Research, May 2002.

"The Length of Psychiatric Hospital Stays and Community Stays," with Steve Stern and Elizabeth Merwin, Virginia Economic Journal, November 2001.

Ph.D. Dissertation: Family Migration Decisions: A Dynamic Analysis, University of Virginia, May 1997.

"Alternative Statistical Methods to Deal with Psychiatric Episode Lengths," with Beth Merwin and Steven Stern, Nursing Research, November/December 1996.

"Industry and Occupational Characteristics of Early Retirement Provision," with Amy Crews, Catherine O'Connor, Benjamin Scafidi, and Steven Stern, University of Virginia Manuscript, February 1994.

PROFESSIONAL ASSOCIATIONS AND MEMBERSHIPS:

American Economic Association

National Association of Forensic Economists

Appendix B

MMTC 4/28/08	CLUSTER ANALYSIS	CLUSTER SPREADSHEET						
Market Rank 2007	Market Name	Market Pops 12+	Cluster Owner	# of Station	# of Stations in Largest COL in Ma	# of Other COL	# Studios Require	MO
1	New York, NY	15,344,600	CBS Radio	6	6	0	1	1
			Spanish Broadcasting System	2	1	1	2	3
			Univision	3	1	2	3	2
			Barnstable Bcstg Inc	5	0	4	4	1
			Cox Radio Inc	4	0	4	4	1
			Citadel/ABC	2	2	0	1	1
			Emmis	3	3	0	1	1
			Aloha Station Trust	2	0	2	2	1
			Greater Media	5	0	4	4	1
			Jarad Bcstg Co Inc	2	0	2	2	1
			Clear Channel	5	3	2	3	1
			Pamal Broadcasting	3	0	2	2	1
			Cumulus	4	0	4	4	1
			Inner City Bcstg	2	2	0	1	3
			Salem Comm Corp	2	1	1	2	1
			MultiCultural Radio	6	2	4	5	3
			ABC/Disney	2	2	0	1	1
			Hudson Westchester	2	0	1	1	1
2	Los Angeles, CA	10,902,400	Clear Channel	9	8	1	2	1
			CBS Radio	7	6	1	2	1
			Liberman Bcstg Inc	6	1	4	5	3
			Salem Comm Corp	4	1	3	4	1
			Spanish Bcstg System	2	1	1	2	3
			Univison	5	2	3	4	2
			Entravision Comm Co	3	0	3	3	1
			Mt Wilson FM Bcstrs	2	0	2	2	1
			Emmis	2	2	0	1	1
			Point Bcstg Co	2	0	2	2	1
			Citadel/ABC	2	2	0	1	1
			Lotus Comm Corp	3	1	2	3	2
			ABC/Disney	2	1	1	3	1
3	Chicago, IL	7,784,400	Crawford Bcstg Co	2	0	2	2	1
			Newsweb Radio Co	7	1	6	7	1
			CBS Radio	7	6	1	2	1
			Univision	5	1	4	5	2
			Clear Channel	7	5	2	3	1
			NextMedia/ Group	11	0	8	8	1
			Bonneville Intl	4	2	2	3	1
			Emmis	2	2	0	1	1
			Nelson Multimedia	4	0	3	3	1
			Porter County Bcstg	3	0	3	3	1
			Salem Comm Corp	2	2	0	1	1
			Citadel/ABC	2	2	0	1	1

			ABC/Disney	2	1	1	2	1
			Kovas Comm	3	0	3	3	1
			Polnet Comm Ltd	4	0	4	4	2
4	San Francisco, CA	5,969,400	Coast Radio Co	2	0	2	2	1
			Aloha Station Trust	3	0	2	2	1
			Maverick Media	5	0	4	4	1
			Redwood Empire	2	0	2	2	1
			Entercom	3	3	0	1	1
			CBS Radio	6	6	0	1	1
			Cumulus Media Prtnrs	5	2	2	3	1
			Clear Channel	7	5	1	2	1
			Sinclair Telecable	2	0	2	2	1
			Univision	6	1	4	5	2
			Wine Country Bcstg	2	0	2	2	1
			Empire Bcstg Corp	2	0	2	2	1
			Nextmedia Group	2	0	2	2	1
			Inner City Bcstg	3	0	2	2	3
			Citadel/ABC	2	2	0	1	1
			Multicultural Radio	4	2	2	3	3
			Baybridge Comm LLC	2	0	1	1	1
			Salem Comm Corp	2	1	1	2	1
5	Dallas, TX	4,973,000	Metro Bcstrs-TX Inc	2	0	2	2	1
			Clear Channel	6	3	3	4	1
			Cumulus Media Prtnrs	6	2	4	5	1
			Liberman Bcstg Inc	6	0	6	6	3
			Univision	5	0	4	4	2
			Radio One Inc	2	1	1	2	3
			Salem Comm Corp	2	0	2	2	1
			LKCM Radio Group	2	0	2	2	1
			Citadel/ABC	3	0	2	2	1
			CBS Radio	6	4	2	3	1
			ABC/Disney	2	0	2	2	1
			Service Bcstg Group	3	1	2	3	2
			Multicultural Radio	2	0	2	2	3
			Chatham Hill Found	2	0	2	2	2
			Mortenson Bcstg Co	5	1	4	5	2
			M&M Broadcasters	2	0	2	2	2
6	Houston, TX	4,639,000	Radio One Inc	3	2	1	2	3
			Cox Radio Inc	4	0	4	4	1
			Univision	7	2	5	6	2
			Clear Channel	8	8	0	1	1
			CBS Radio	4	3	1	2	1
			Cumulus Media Prtnrs	3	1	2	3	1
			Liberman Bcstg Inc	7	2	5	6	3
			Salem Comm Corp	2	1	1	2	1
			Multicultural Radio	2	1	1	2	3

			SIGA Bcstg Corp	2	0	2	2	3
7	Philadephia, PA	4,350,000	Beasley Bcst Group	4	3	1	2	1
			Greater Media	5	4	1	2	1
			CBS Radio	5	5	0	1	1
			Clear Channel	6	6	0	1	1
			Radio One Inc	2	0	2	2	3
			Salem Comm Corp	2	2	0	1	1
8	Atlanta, GA	4,267,500	CBS Radio	3	3	0	1	1
			Lincoln Financial Md	2	1	1	2	1
			Clear Channel	7	3	4	5	1
			Cox Radio Inc	5	2	3	4	1
			Radio One Inc	4	0	4	4	3
			Cumulus Media Prtnrs	2	1	1	2	1
			Citadel/ABC	2	0	2	2	1
			Davis Bcstg	2	0	2	2	3
			Salem Comm Corp	5	3	2	3	1
			Dickey Bcstg Co	3	1	2	3	1
			Beasley Bcst Group	2	1	1	2	1
			La Favorita Inc	3	0	3	3	3
			JW Bcstg Inc	2	0	2	2	1
			Gradick, Steven L.	2	0	1	1	1
			Word Christian Bcstg	3	0	3	3	1
			MultiCultural Radio	2	0	2	2	3
9	Washington, DC	4,210,000	Red Zebra Bcstg	3	0	3	3	1
			Radio One Inc	4	2	2	3	3
			CBS Radio	5	0	4	4	1
			Clear Channel	8	7	1	2	1
			Nassau Bcstg Ptrs LP	2	0	2	2	1
			Aloha Station Trust	2	0	1	1	1
			Bonneville Intl	6	2	4	5	1
			Salem Comm Corp	2	0	1	1	1
			Citadel/ABC	3	2	1	2	1
			MulitiCultural Radio	2	0	2	2	3
10	Boston, MA	3,874,600	Phoenix Media Comm	2	0	2	2	1
			Northeast Bcstg Co	4	0	3	3	1
			Greater Media	5	2	3	4	1
			Entercom	5	2	3	4	1
			CBS Radio	5	5	0	1	1
			Plymouth Rock Bcstg	2	0	1	1	1
			Nassau Bcstg Ptrs	2	0	2	2	1
			Westport Comms LP	2	0	2	2	1
			Clear Channel	3	1	2	3	1
			Salem Comm Corp	3	3	0	1	1
			Langer Bcstg Group	2	0	2	2	1
			Costa Eagle Bdcst	3	0	3	3	2

			J Sports Boston	2	0	2	2	1
			Absolute Bcstg LLC	2	0	2	2	1
			Principle Bcstg Ntwk	2	0	2	2	2
			MultiCultural Radio	2	0	2	2	3
11	Detroit, MI	3,866,500	Clear Channel	7	5	1	2	1
			Citadel/ABC	3	3	0	1	1
			Greater Media	3	2	1	2	1
			CBS Radio	6	6	0	1	1
			Radio One Inc	2	0	2	2	3
			Liggett Comm LLC	4	0	2	2	1
			Crawford Bcstg Co	2	0	2	2	1
			Birach Bcstg Corp	2	0	2	2	1
			Salem Comm Corp	2	2	0	1	1
12	Miami, FL	3,538,400	Spanish Bcstg System	2	0	2	2	3
			Cox Radio Inc	4	4	0	1	1
			Clear Channel	7	2	2	3	1
			Beasley Bcst Group	4	1	2	3	1
			Univision	4	3	1	2	2
			Lincoln Financial Md	3	1	2	3	1
			Rodriguez, J & V	2	1	1	2	3
			Salem Comm Corp	2	0	2	2	1
			Alliance Bcstg Netwk	2	0	2	2	2
			MultiCultural Radio	3	0	2	2	3
13	Puerto Rico	3,328,500	Spanish Bcstg System	11	2	8	9	3
			Roman Catholic Diocese	2	1	1	2	3
			Uno Radio Group	14	2	10	11	3
			Arzuaga, Jose J	2	0	2	2	3
			Newlife Bcstg Inc	2	0	2	2	3
			Univision	5	2	2	3	2
			Mejil, Luis	4	1	3	4	3
			Borinquen Bcstg Co	2	0	1	1	3
			Pan Caribbean Bcstg	2	0	2	2	3
			Internatl Bcstg Corp	8	2	6	7	3
			Blanco Pi, Wilfredo	2	1	1	2	3
			Media Power Gr Inc	3	0	3	3	3
			Calvry Evangel Missn	2	1	1	2	2
14	Seattle-Tacoma, WA	3,328,100	Sandusky Radio	5	2	3	4	1
			Clear Channel	5	2	3	4	1
			CBS Radio	5	4	1	2	1
			Bonneville Intl	3	2	1	2	1
			Bustos Media Entrprs	2	0	2	2	3
			Entercom	4	3	1	2	1
			Fisher Comm Inc	3	3	0	1	1
			Crista Ministries	3	0	2	2	1
			Salem Comm Corp	5	3	2	3	1

			Gottlieb, Alan M	2	0	2	2	1
			Suh, Jean	2	0	2	2	3
			KRIZ Bcstg Inc	3	0	2	2	3
			Seattle Streaming	2	0	2	2	2
15	Phoenix, AZ	3,173,200	Bonneville Intl	3	2	1	2	1
			Sandusky Radio	5	0	3	3	1
			CBS Radio	3	2	1	2	1
			Clear Channel	8	7	1	2	1
			Riviera Broadcast	2	0	2	2	1
			Univision	4	0	4	4	2
			Entravision	4	0	4	4	2
			Salem Comm Corp	2	1	1	2	1
			Communicom	2	1	1	2	1
16	Minneapolis, MN	2,683,000	Citadel/ABC	5	1	4	5	1
			Hubbard Bcstg Inc	4	0	3	3	1
			Clear Channel	7	4	3	4	1
			Hanten Bcstg Inc	2	0	2	2	1
			Borgen, Gregory	2	0	1	1	1
			Salem Comm Corp	3	1	2	3	1
			Davidson Media	2	0	2	2	2
17	San Diego, CA	2,515,100	Finest City Bcstg	3	0	1	1	1
			Lincoln Financial Md	4	3	1	2	1
			Clear Channel	7	5	2	3	1
			CBS Radio	2	2	0	1	1
			Midwest TV Inc	2	2	0	1	1
			Univision	2	2	0	1	2
			Astor Bcst Group	2	0	2	2	1
			Salem Comm Corp	2	1	1	2	1
18	Nassau-Suffolk, NY	2,359,300	Univision	2	0	2	2	2
			Cherry Creek Radio	4	0	4	4	1
			Barnstable Bcstg Inc	6	2	4	5	1
			Cox Radio Inc	3	0	3	3	1
			Jarad Bcstg Co Inc	3	0	3	3	1
19	Tampa, FL	2,350,000	CBS Radio	6	1	5	6	1
			Clear Channel	9	3	5	6	1
			Cox Radio Inc	6	1	4	5	1
			Salem Comm Corp	3	0	3	3	1
			ZGS Communications	2	1	1	1	3
			Mega Comm Holdings	2	0	2	2	2
			Wagenvoord	2	0	2	2	1
			Genesis Comm Inc	2	0	2	2	1
20	St. Louis, MO	2,308,400	Bonneville Intl	3	1	2	3	1
			Clear Channel	5	4	1	2	1

			Emmis	4	1	3	4	1
			Kaspar Bcstg Co	2	0	1	1	1
			Big League Bcstg	3	0	3	3	1
			Fidelity Bcstg	2	0	2	2	1
			Compu Traffic Inc	2	0	2	2	1
			Crawford Bcstg Co	2	2	0	1	1
			Birach Bcstg Corp	2	1	1	2	1
			Radio Prop Ventures	2	1	1	2	1
			Simmons Media	2	1	1	2	1
			Entertainment Media	2	1	1	2	1
			Radio One Inc	2	0	2	2	3
21	Baltimore, MD	2,255,100	Radio One Inc	4	3	1	2	3
			Clear Channel	3	3	0	1	1
			Peter & John Radio	2	2	0	1	1
			Hearst-Argyle	2	2	0	1	1
			CBS Radio	6	4	2	2	1
			Mangione, Nick	2	1	1	2	1
			Sajak Bcstg Corp	2	0	2	2	1
22	Denver, CO	2,244,300	Entravision Comm Co	3	0	3	3	2
			CBS Radio	2	1	1	2	1
			Clear Channel	9	5	3	4	1
			Salem Comm Corp	4	3	1	2	1
			Lincoln Financial Md	5	2	2	3	1
			Entercom	3	3	0	1	1
			Denver Radio Co	2	0	2	2	1
			Crawford Bcstg Co	4	2	2	3	1
23	Portland, OR	2,049,600	Entercom	7	4	3	4	1
			Salem Comm Corp	5	2	3	4	1
			Rose City Radio Corp	2	2	0	1	1
			CBS Radio	6	4	2	3	1
			Clear Channel	5	2	3	4	1
			Pamplin Comm Corp	2	0	2	2	1
			Coss, Donald D	2	0	2	2	1
			Bustos Media Entrprs	5	2	3	4	3
24	Pittsburgh, PA	1,986,600	Frisching, Saul	2	1	1	2	1
			CBS Radio	4	3	1	2	1
			Clear Channel	6	6	0	1	1
			Keymarket Licenses	7	2	5	6	1
			Washington Bcstg Co	2	0	2	2	1
			Butler Cnty Radio	2	0	2	2	1
			Renda Bcstg Corp	3	2	1	2	1
			Salem Comm Corp	2	2	0	1	1
			Broadcast Comm Inc	3	0	3	3	1
			Wall, Stanley L	2	0	2	2	1
			Sheridan Bcstg	3	0	3	3	3

			Iorio, Frank	2	0	2	2	1
25	Charlotte, NC	1,886,100	Radio One Inc	2	0	2	2	3
			CBS Radio	7	5	2	3	1
			Clear Channel	5	0	5	5	1
			Greater Media	3	2	1	2	1
			Davidson Media	3	0	3	3	2
			GHB Bcstg	5	1	4	5	1
			Our Three Sons Bcstg	2	0	2	2	1
			HRN Broadcasting	5	0	4	4	1
			Stanly Comms	2	0	2	2	1
			Norsan Cons & Mgmt	2	1	1	2	3
			Ford Bcstg Co Inc	2	0	2	2	1
			RejoyNetwork	2	0	2	2	1
26	Riverside, CA	1,828,500	Magic Bcstg LLC	2	0	2	2	2
			Clear Channel	6	2	3	4	1
			Anaheim Bcstg Corp	2	0	2	2	1
			All Pro Bcstg	2	0	2	2	3
			Lazer Bcstg Corp	3	0	3	3	3
27	Sacramento, CA	1,805,200	Clear Channel	4	2	2	3	1
			CBS Radio	6	4	2	3	1
			Nevada County Bcstrs	2	0	1	2	1
			Bustos Media Entrprs	3	0	3	3	3
			Entercom	6	4	2	3	1
			Entravision Comm Co	4	1	3	4	2
			Salem Comm Corp	4	2	2	3	1
			IHR Educ Bcstg	2	0	2	2	1
			MultiCultural Radio	2	0	1	1	3
28	Cleveland, OH	1,782,400	CBS Radio	4	4	0	1	1
			Radio One Inc	4	4	0	1	3
			Salem Comm Corp	3	3	0	1	1
			Aloha Station Trust	5	4	1	2	1
			Elyria-Lorain Bcstg	2	0	1	1	1
			Good Karma Bcstg	2	2	0	1	1
			Wilbur, Douglas	2	0	2	2	1
29	Cincinnati, OH	1,751,400	Clear Channel	8	7	1	2	1
			Bonneville Intl	4	2	2	3	1
			Cumulus Media Prtnrs	3	1	2	3	1
			First Bcstg Prtnrs	3	0	2	2	1
			Radio One Inc	3	1	2	3	3
			Vernon R Baldwin Inc	3	0	3	3	1
			RadSta WPAY/WPFB	2	0	1	1	1
			Christian Bcstg Sys	2	1	1	2	1
30	San Antonio, TX	1,626,500	New Braunfels Comm	2	0	1	1	1

			Clear Channel	6	5	1	2	1
			Univision	6	3	3	4	2
			Border Media Ptnrs	7	3	4	5	3
			Cox Radio Inc	7	3	4	5	1
			Barger, John	2	1	1	2	1
			Salem Comm Corp	2	1	1	2	1
31	Salt Lake City, UT	1,621,900	Millcreek Bcstg LLC	4	0	4	4	1
			Citadel Comm	8	4	3	4	1
			Clear Channel	6	3	3	4	1
			3 Point Media	2	0	2	2	1
			Simmons Media	7	1	6	7	1
			Capital Broadcasting	2	0	2	2	1
			Bonneville Intl	5	3	2	3	1
			Bustos Media Entrprs	2	0	2	2	3
			KSOP Inc	2	2	0	1	1
			United Bcstg	2	0	1	2	1
32	Kansas City, MO	1,592,800	Bott Radio Network	4	0	4	4	1
			Wilks Bcst Gp LLC	4	4	0	1	1
			Cumulus Media Prtnrs	5	0	5	5	1
			Entercom	8	4	4	5	1
			Carter Broadcast Grp	2	2	0	1	3
			Union Broadcasting	2	1	1	2	1
			Alpine Bcstg Corp	2	0	2	2	1
			Davidson Media	2	1	1	2	2
33	Las Vegas, NV	1,541,900	Lotus Comm Corp	4	4	0	1	2
			Entravision Comm Co	2	1	1	2	2
			Clear Channel	4	3	1	2	1
			CBS Radio	5	1	3	4	1
			Beasley Bcst Group	5	2	3	4	1
			Univision	3	1	2	3	2
			Summit Media Inc	2	0	2	2	1
			Riviera Broadcast	2	0	2	2	1
			Burken Bcstg	2	2	0	1	1
34	Orlando, FL	1,479,900	Cox Radio Inc	6	3	3	4	1
			Aloha Station Trust	7	2	4	5	1
			CBS Radio	3	1	2	3	1
			Salem Comm Corp	3	1	2	3	1
			Florida Bcstrs	2	0	2	2	3
			J & V Comm Inc	3	0	3	3	3
			Rama Comm Inc	3	0	2	2	3
35	San Jose, CA	1,465,400	Aloha Station Trust	2	1	1	2	1
			NextMedia Group	2	1	1	2	1
			Empire Bcstg Corp	2	1	1	2	1
			Cumulus Media Prtnrs	2	0	2	2	1

			Univision	5	1	4	5	2
36	Milwaukee, WI	1,431,300	Bliss Communications	4	0	2	2	1
			Milwaukee Radio LLC	3	2	1	2	1
			Clear Channel	6	4	2	3	3
			Saga Comm Inc	4	3	1	2	1
			Entercom	3	2	1	2	1
			Kettle Moraine Bcstg	2	0	1	1	1
			Good Karma Bcstg	2	0	2	2	1
37	Columbus, OH	1,427,000	Clear Channel	6	4	2	3	1
			Saga Comm Inc	4	1	3	4	1
			Wilks Bcst Gp LLC	3	1	2	3	1
			RadiOhio Inc.	2	2	0	1	1
			Radio One Inc	3	2	1	2	3
			N American Bcstg Co	3	2	1	2	1
			WCLT Radio Inc	2	0	2	2	1
			Runnymede Corp	2	0	2	2	1
			D.B Zwirn & Co LP	2	1	1	2	2
38	Middlesex, NJ	1,378,800	Greater Media	4	0	3	3	1
39	Providence, RI	1,376,500	Citadel Comm	8	4	4	5	1
			Clear Channel	4	3	1	2	1
			Judson Group	2	0	2	2	1
			Hall Communications	3	0	2	2	1
			Astro Tele-Comm	2	0	2	2	1
			Karam, Bob & James	2	0	1	1	2
40	Indianapolis, IN	1,350,900	Emmis	3	3	0	1	1
			Cumulus Media Prtnrs	3	0	3	3	1
			Clear Channel	3	3	0	1	1
			Radio One Inc	4	2	2	3	2
			Entercom	3	2	1	2	1
			Mid-Amer Radio Grp	2	0	2	2	1
			Continental Bcst Grp	2	1	1	2	1
41	Norfolk, VA	1,327,700	Clear Channel	3	1	2	3	1
			Max Media LLC	5	1	3	4	1
			Sinclair Telecable	5	2	3	4	1
			Entercom	4	2	2	3	1
			Saga Comm Inc	3	1	2	3	1
			WXGM Inc	2	0	1	1	1
			Red Zebra Bcstg	2	0	2	2	1
			ABC/Disney	2	0	1	1	1
			Willis Bcstg	3	0	2	2	3
			Birach Bcstg Corp	2	0	2	2	1
42	Austin, TX	1,309,500	Border Media Ptnrs/Encino Bcs	7	1	6	7	3

			Emmis	6	2	4	5	1
			Entercom	3	1	2	3	1
			Clear Channel	5	4	1	2	1
			Univision	2	0	2	2	2
			Simmons Media	2	0	2	2	1
43	Raleigh, NC	1,230,300	Clear Channel	4	0	4	4	1
			Curtis Media Group	11	6	4	5	1
			Radio One Inc	4	0	4	4	3
			Prieto Bcstg	2	0	2	2	3
			Rodriquez, Estuardo	3	0	3	3	3
			Davidson Media	2	0	2	2	2
44	Nashville, TN	1,182,900	Cumulus	5	1	4	5	1
			South Central Comm	2	1	1	2	1
			Salem Comm Corp	3	0	3	3	1
			Clear Channel	5	3	2	3	1
			Bay, Susan	2	0	1	1	1
			Cromwell Group	2	0	2	2	1
			Citadel Comm	2	1	1	2	1
			Grace Bcstg Services	2	0	2	2	1
			Davidson Media	2	2	0	1	2
			Lightning Bcstg LLC	2	0	2	2	1
			Barry, William	2	1	1	2	1
45	Greensboro, NC	1,154,400	Dick Bcstg Co Inc	2	0	2	2	1
			Entercom	6	4	2	3	1
			Davidson Cnty Bcstg	2	0	2	2	1
			Clear Channel	5	0	4	4	1
			GHB Bcstg	3	0	2	2	1
			Curtis Media Group	5	0	5	5	1
			Truth Bcstg	4	1	3	4	1
46	West Palm Beach, FL	1,116,400	Clear Channel	6	3	2	3	1
			Glades Media	2	1	1	2	3
			Beasley Bcst Group	2	0	1	1	1
			CBS Radio	5	2	3	4	1
			James Crystal LLC	3	1	2	3	1
			BGI Bcstg Inc	2	0	1	2	3
47	Jacksonville, FL	1,106,400	Clear Channel	6	3	3	4	1
			Renda Bcstg Corp	4	2	2	3	1
			Cox Radio Inc	6	4	2	3	1
			Tama Broadcasting	3	0	3	3	3
			Norsan Cons & Mgmt	4	0	4	4	3
			Phillips Bcstg LLC	2	0	1	1	1
			Chesapeake-Portsmouth	2	2	0	1	1
48	Oklahoma City, OK	1,091,300	Renda Bcstg Corp	4	4	0	1	1

			Tyler Media Corp	5	1	4	5	1
			Bott Radio Network	2	1	1	2	1
			Clear Channel	5	4	1	2	1
			Citadel Comm	5	3	2	3	1
			Perry Bcstg Co Inc	2	1	1	2	3
			One Ten Bcst Group	3	0	2	2	1
			Last Bastion Trust	2	0	2	2	1
49	Memphis, TN	1,072,800	Autry, Billy	2	0	1	1	1
			Entercom	6	4	2	3	1
			Covington Bcstg	2	0	1	1	1
			Sudbury Bcst Group	5	0	4	4	1
			Clear Channel	6	3	3	4	1
			Citadel Comm	4	1	3	4	1
			Flinn, Catherine J	8	2	5	6	1
50	Hartford, CT	1,049,200	Aloha Station Trust	5	1	4	5	1
			CBS Radio	4	3	1	2	1
			Buckley Bcstg Corp	3	2	1	2	1
			Marlin Bcstg LLC	2	1	1	2	1
			Gois Bcstg LLC	2	0	2	1	3

Appendix C

Assumptions and Definitions: MMTC Cluster Database

Market Rank 2007, Name and Market Pops 12+: These columns are derived from the Arbitron Inc. 2007 ranking of markets by Estimated Metro Population, Persons 12+. Total populations of all markets are less than the total in Market Pops 12+ column because the Nassau-Suffolk and Middlesex-Somerset-Union metros are embedded in the New York Metro and the San Jose Metro is embedded in the San Francisco Metro.

Cluster Owner: Data was derived from the BIA Radio Market Report (2008). Updates of ownership information were made for one transaction (Border Media Partners purchase of stations owned by Encino Broadcasting in Austin, TX) that closed after BIA's book went to press. This data excludes a cluster owner whose stations are licensed to communities in Canada (Detroit Market) and two cluster owners whose stations are located in to communities in Mexico (San Diego Market), since the FCC does not license these stations.

Number of Stations: Full power commercial AM and FM stations owned by the Cluster Owner in the market. Note that this study does not include full power noncommercial or LPFM stations. This study examines only clusters; it does not include companies that own only one station per market, since these stations, each with one main studio already, would not be affected by the FCC's proposed new rule (described below) affecting the number of main studios a company must have in each market.

Number of Stations in Largest COL (Community of License) in Market: Number of AM and FM stations, owned by the Cluster Owner in the market, that are licensed by the FCC to the largest city in the market (e.g., to Dallas in the Dallas-Ft. Worth Market; to San Juan in the Puerto Rico market).

Number of Other COLs: Number of communities, other than the largest COL in the market, in which the Cluster Owner has AM or FM stations in that market. For example, NextMedia has 11 stations in the Chicago market, none licensed to Chicago. Two stations each are licensed to Kenosha, Waukegan and Joliet, and the other five are each licensed to different suburban communities. Therefore NextMedia has eight "Other COLs."

 # Studios Required: Number of different COLs, each with at least one station owned by the Cluster Owner licensed to it (tracking the FCC's proposal to revert to its pre-1987 rule under which each station was required to have a main studio in its community of license). For example, under this proposed FCC rule, in Chicago, NextMedia would need eight studios, one for each of its Other COLs. CBS Radio, in Chicago, has seven stations, six of which are licensed to Chicago and one to Elmwood Park; thus, under the proposed rule, CBS Radio would require two studios.

MO (Minority Ownership Status): Nonminority owners that are not exclusively ethnic or multilingual programming specialists in the market are coded as 1. We are defining "ethnic or multilingual" to include urban (Black), Black gospel, Spanish, Portuguese, Korean, Chinese or Polish programming. Nonminority owners that are exclusively ethnic or multilingual programmers in that market are coded as 2. Minority owners (including one owner (Glades Media, West Palm Beach) in which the minority partner has negative (50%) control) are coded as 3. Programming specializations were drawn from the BIA Radio Market Report (2008). Ownership status by race (except where already known to MMTC) was drawn from the FCC Media Bureau's online Consolidated Database Service (CDBS), which contains every station's Annual Ownership Report (FCC Form 323).

Appendix D

Appendix D - t-test Analysis
Comparison of Average Community of License Ratio and Studio Ratio
Ethnic Programming / Minority Owned Clusters v. Non-minority, Non-ethnic Programming Clusters
Top 50 Ranked Markets in 2007

Proportion	Cluster Partition	# Minority-Ethnic Count	# Non-minority Non-Ethnic Count	Minority Ethnic Average Proportion	# Non-minority Non-Ethnic Proportion	Difference in Proportions	2-tailed Probability	# Standard Deviations	Statistical Significance
COL ratio	(Ethnic programming or minority owned) v. Non-minority	113	345	0.2243	0.3688	-0.1444	<.0001	-4.30	Yes
COL ratio	Ethnic programming v. Non-minority	41	345	0.2484	0.3688	-0.1203	0.0421	-2.04	Yes
COL ratio	Minority owned v. Non-minority	72	345	0.2106	0.3688	-0.1581	<.0001	-4.05	Yes
Studio ratio	(Ethnic programming or minority owned) v. Non-minority	113	345	1.2335	1.6260	-0.3925	<.0001	-5.59	Yes
Studio ratio	Ethnic programming v. Non-minority	41	345	1.2285	1.6260	-0.3976	0.0002	-3.97	Yes
Studio ratio	Minority owned v. Non-minority	72	345	1.2364	1.6260	-0.3896	<.0001	-5.12	Yes

COL Ratio = Stations in Largest COL / Total Stations
Studio Ratio = Total Stations / # of Studios Required

Appendix D - Censored Regression Analysis
Analysis of Community of License Ratio and Studio Ratio - Controlling for Market Population
Ethnic Programming / Minority Owned Clusters v. Non-minority, Non-ethnic Programming Clusters
Top 50 Ranked Markets in 2007

Dependent Variable	Minority-Ethnic Control	# Minority-Ethnic Count	# Non-minority Non-Ethnic Count	Minority-Ethnic Coefficient Estimate	Standard Error	2-tailed Probability	# Standard Deviations	Statistical Significance
COL ratio	Ethnic programming or minority owned	113	345	-0.3073	0.0772	<.0001	-3.98	Yes
COL ratio	Ethnic programming	41	345	-0.2292	0.1170	0.0502	-1.96	Borderline
COL ratio	Minority owned	72	345	-0.3574	0.0922	0.0001	-3.88	Yes
Studio ratio	Ethnic programming or minority owned	113	345	-1.2062	0.2320	<.0001	-5.20	Yes
Studio ratio	Ethnic programming	41	345	-1.2561	0.3632	0.0005	-3.46	Yes
Studio ratio	Minority owned	72	345	-1.1712	0.2754	<.0001	-4.25	Yes

COL Ratio = Stations in Largest COL / Total Stations
Studio Ratio = Total Stations / # of Studios Required