

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

In the Matter of)
The Future of Media and) GN Docket 10-25
Information Needs of)
Communities in the Digital)
Age)

COMMENTS OF THE ASSOCIATION OF INDEPENDENTS IN RADIO, INC.

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The Association of Independents in Radio, Inc. ("AIR") respectfully submits the following comments to the FCC as it considers the *Future of Media and Information Needs of Communities in the Digital Age*.

I Executive Summary and Recommendations

We believe that the following three goals should be inherent in any actions taken by the FCC as it considers the transition from Public Broadcasting to Public Media:

1. **Appeal to the higher idealism** of *all* Americans as investors in a new vision of Public Media, an enterprise that embodies the democratic principals of independence, truth, and inclusiveness, bringing benefit and engagement to all.
2. **Infuse public media** with a new entrepreneurial spirit;
3. **Introduce a bold new era of journalism** that gives a young generation of independent transplatform journalists the freedom and flexibility they need to lead us forward, borrowing from the old and inventing the new.

To achieve these goals, we recommend that policy changes made by the FCC support the following actions and principles:

1. **Expand funding for public media.** A key rationale must be to create and sustain the new, middle capacity” (see pg 5) – beyond the current, trickle down station-network infrastructure. This middle capacity represents the “connective tissue” between the traditional broadcast network and new publics – the nimble, entrepreneurial sector of the industry.
2. **Seek funds outside of Congressional appropriation,** perhaps including direct citizen contribution. Another, additional approach is to redirect CSG funds that remain unspent by stations to a “pool” designated for producers.
3. **Add, don’t subtract.** The expansion of the public media framework to be more inclusive should not take away from or weaken the existing network; it will be an additive process.

4. **Establish parity between television and radio independents** by creating or “earmarking” funds specifically dedicated to radio indies as funds are currently dedicated to television indies.
5. **Commit to the understanding that, regardless of the prospect of additional funding, the new alignment of public media will:**
 - re-position stations and independent producers to form hyper-local “pub-hubs,” reaching deep into communities not currently represented in public broadcasting, and provide new approaches to turning to citizens to engage as documentarians.
 - provide the means for the extensive constituency of independent producers and a new generation of social media entrepreneurs to directly benefit from the subsidies of public media;
 - Spur bold invention in areas of citizen/social engagement, technology, and approaches to story-telling and documentary.
6. **Ensure through the implementation of new policies and impact measurements that independent media producers** are recognized, codified, and fully supported as defining element of the new public media.

II. **Introduction to AIR**

AIR, the Association of Independents in Radio, is comprised of 760 producers and associates working independently, across 44 states and 10 countries; a constituency as large as NPR's A-rep/ member station network. The 67% of our members who self-identify as independent producers are not limited to radio, but are increasingly working across platforms. A third of our newest in-coming members say that "on-line" is their primary professional orientation, and increasing numbers of incorporating video, slide-show, API, and other media into their work.

All four major public broadcasting networks belong to AIR, as well. NPR, BBC, PRI, and PRI have, according to the terms of their membership, up to 15 individual staff each who are included

in our roster.

Independence can be defined in a variety of ways. It describes how one makes their income – self generated versus being on a payroll – or where one goes to work each day – to a home studio versus to the headquarter of an organization. Independent, particularly when speaking of journalism or politics, also connotes freedom from outside influence. While some or all of these elements apply to most of our members, what unifies our organization is a *spirit* of independence. This spirit recognizes the unique capacity of an individual, inspired producer who is given the freedom and flexibility, and the sustaining resources, to pursue their work.

As we consider/reconsider the future of public media and the future of journalism, we must imagine a new structure that will give shape and discipline to the new paradigm that is emerging. The old system has depended on the scarcity of the means of communications -- a finite number of broadcast outlets, little more than 200 gatekeepers who choose programming, and a finite number of hours each day to schedule programs. The old system is defined, too, by a well-organized and tightly controlled network of distribution outlets. The new system is driven by an abundance of media platforms, and an "anybody can play" attitude, and lacking any overarching or protective framework.

This new public media structure must recognize, support and tap inventive independent journalists working across media platforms and from many alternative walks of life. They are crucial to helping create new pathways from citizens in the far reaches of communities through to the powerful network of broadcast outlets and beyond. They are nimble, and can be risk-averse in ways that are sometimes difficult for large, established organizations. By their actions and practices, they give begin to help build out this framework of new public media journalism.

III. Lessons Learned: Public Media's first demonstration project, MQ2

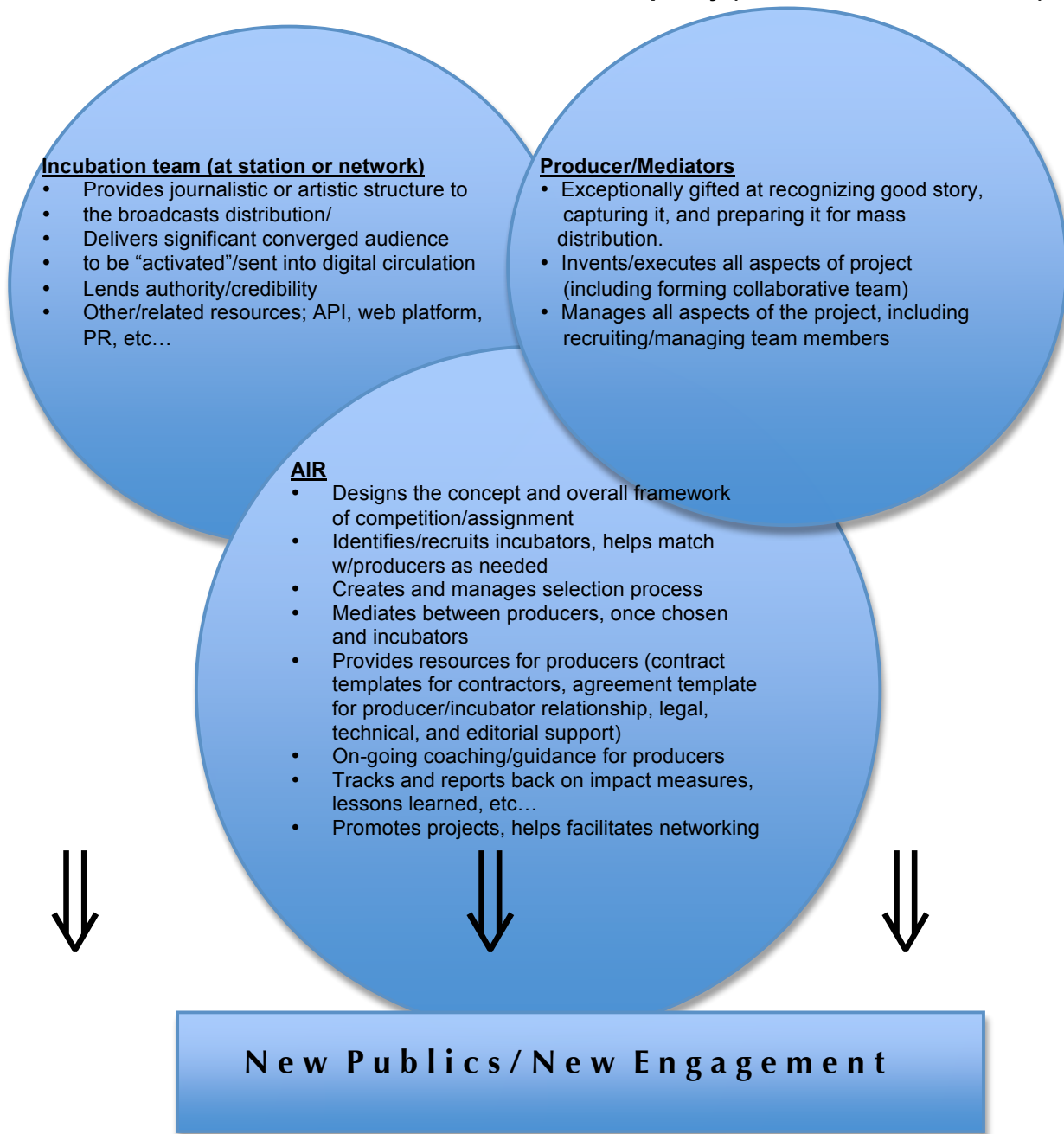
It is critical that the FCC, as it considers new policies to shape the future public media, understand that it is not digital technology that is driving change. Change occurs only when new

technologies – platforms, tools, and other innovations – are put into the *hands of individuals*. It is the crafts-people who are driving the change by inventing new formats and approaches borne of the technological evolution. In this regard, it's important to point out, too, that the technological forces that are destroying the old institutions, such as newspapers, are enabling individuals to do what only those institutions could once do.

In 2009, AIR launched Makers Quest 2.0, or MQ2, with funding from CPB. This pilot project was designed to experiment with this premise of the maker as driver of change. Indeed the assignment given to the 8 producers selected through competitive process was to “lead public *radio* to public *media*” by marrying traditional broadcast platforms with digital tools and technology. With 5 months and \$40,000 each, these producers each invented a distinctive and imaginative approach providing models for an industry eager for examples of what public media actually looked like, sounded liked.

Overall, MQ2 allowed us to put into practice the new, emergent “middle ground” of public media – a comprised of the producers, AIR, and the station and network incubators who, together, conspired to reach new publics and engage them using digital technology as participatory documentarians.

Elements of Public Media's New Creative Capacity (aka the "Middle Ground")



The best MQ2 projects are marked by 1) highly skilled, uniquely inventive principals of the projects, 2) integrated, cross-disciplinary collaborative teams who shared a high sense of purpose and a clear vision of the importance of their work, 3) demonstrated flexibility on both sides of the producer-incubator relationship, 4) themes and produced material that resonated strongly with the public either because of its timeliness and/or relevance to contemporary life and culture, 5) new and direct means to use media to tap deep into local communities and allow citizens to engage as documentarians of their own lives, and 6) ground-breaking technological innovation –

“hacking” together existing devices or freeware to achieve a different function.

MQ2 provides the FCC with some important lessons as it considers the future of media, and how to best expand this critical “middle ground.” Here are five that are pertinent:

- 1) **Demands of diversity.** Producers considered to be “diverse” – whether because of age, ethnic, socio-economic, or other factors – require more resources, time, and support to assimilate into the existing dominant public media culture (white, highly educated achievers). There are barriers in language, in skill-level, and/or in sheer confidence that must be calculated to give them their greatest shot at success.
- 2) **Public Media projects are collaborative.** Though it was not requisite, each MQ2 producer grantee assembled up to 15 member collaborative teams in order to quickly assimilate and adapt their approach to the multi-platform demand of the assignment. This has implications on funding and in the skills needed to manage a team.
- 3) **Scalability/budgets.** In the final analysis, \$40K was not enough for the MQ2 projects. Producers compromised their own fees to pay for necessary skills from the \$40K budgets they were given, or aggressively negotiated and bartered with contractor/collaborators. The producers estimated that the costs of the projects on their end alone, if accurately scaled, would have cost upwards of \$60-\$100K each.
- 4) **The cost to each station incubator** is scaled relative to their level of editorial or other involvement in the project. The costs we began to track relative to MQ2 were approximately \$10K for editorial staff per 5-month project and additional costs relative to promotion, web-support, overhead, etc...
- 5) **In managing producers, it’s important to strike the right balance between structure and discipline, and freedom to invent.** A quick time-line is wise; producers’ pilot phase should be 7 to 9 months, sufficient to push the creative envelope, but not overburden the producer.

IV. Looking to the past to see the future

The public broadcasting industry consistently fails to mainstream innovation. One of the most significant and difficult demonstration lessons of MQ2 has been the industry's inability to provide sustaining support for AIR or for any of the producers involved in the initiative. When the pilot funding from CPB ended, a number of the producers have worked – without compensation or financial support – to move their projects forward. There is strong promise, but the road is very difficult. Likewise AIR is in negotiations for the next round of MQ2 projects, investing considerable resources in the process but without funding from the system itself. This is not an indictment on any one institution or organization but is, rather, emblematic of the widespread failure of the system relative to innovation.

As the commission seeks a new vision for the future, it's important that it be placed the context of the present legacy. In this way, we can discover important lessons -- what can we “get right” this time? What different outcomes can we expect if we change certain factors or influences?

AIR was incorporated in 1988 by 10 independent producers reacting, in large part, to CPB's decision to cut the one and only pot of funding dedicated to producers. The Satellite Program Distribution Fund (SPDF) was created in the early to mid-80's to fill the largely unused capacity of what was at that time a new technology – the 24x7 satellite channels that interconnected public radio stations. The SPDF fueled dozens of start-up projects and gave some of today's best and brightest veteran producers their first start. Since it's inception, and particularly in the last two decades of public radio, the subsidized economy of the industry has been hard-wired to supporting the stations and networks. The approach to the economy of independent radio producers has relied on a trickle down approach. This approach has failed to sustain in a consistent way the independent sector of the industry. It has led to an inconsistent, ad-hoc system whereby resources to support this critical sector is left wholly to the discretion of the station and network staff and executives, most of whom – understandably – give priority to their own programs and producers.

The last 18 months of the economic downturn in the US has provided a timely lesson in how the trickle down theory does not work. Beginning in December 2008, we've witnessed the eliminations or severe reduction of acquisitions budgets. The primary vehicles for independent work – APM's *Weekend America*, NPR's *Day to Day* were canceled and the weekly showcase for independent work, *Hearing Voices* lost its principal CPB funding. The already fragile economy for independent producers has been all but erased. These cancellations were made by network executives focused – understandably – on the bottom line. There was all but no awareness on any of their parts their decisions would have on the independent sector – the creative culture – of our industry.

These events come at a time when public media is – perhaps more than any other time – in need of its most inventive, independent minded talent.

As we stand ready to invent a new future that is more democratic, more inclusive, and highly inventive relative to trans-platform public media, we ask, 'what's at stake?' What do we stand to gain if we can address the failure of the past economic model? What will we lose if we do not address this?

AIR believes the shift underway across public media is happening from the bottom up, and this is a key defining aspect that sets future apart from the past. In this construct, the bottom layer is comprised of citizens themselves, mobilized as documentarians of their own experience, and curators of their own information consumption. The next layer up are our AIR members and other multi-media producers, working close to the ground as skilled mediators of story, mediators between populace and powerful -- yet often inaccessible -- broadcast media outlets.

If we fail to address the flaws in the current economy of the industry, we will fail at seizing a tremendous opportunity to activate and sustain a new framework where producer-entrepreneurs act as the fiber between the public... the street...and the local station institutions—what Ellen Goodman refers to this as the “middle” or curated space between broadcast outlets, the skilled professional, and the engaged citizen who generates content, invents, and tells stories in their

own right. Once we recognize where our producers fit in to our future paradigm, we understand the need to shake up the historical construct of the subsidized economy; to extend its benefits to producers; to provide them with the resources and flexibility they need.

V. On Impact

*Excerpted from **Spreading the Zing: Reimagining Public Media Through the Makers Quest***

2.0 by Jessica Clark Director, Future of Public Media Project, Center for Social Media,

American University and Sue Schardt Executive Director, Association of Independents in Radio,

Inc.]

Public media projects are moving from familiar broadcast forms to multiplatform models that are often more open and participatory. In light of this, how can we best evaluate their impact? And what elements of impact are most salient in the public media context, in which mission is as central as sustainability or reach?

This paper sets out to examine these questions through the lens of a particular set of projects designed to demonstrate how “public radio” can be transformed into “public media.” The Public Radio Makers Quest 2.0 competition (MQ2), which was designed and administered by the Association of Independents in Radio (AIR), supported eight multiplatform, participatory radio projects led by independent and station-based producers. The MQ2 projects, funded by the Corporation for Public Broadcasting, launched simultaneously in April 2009, with support and “incubator” partnerships at NPR and local public radio outlets guaranteed through August 2009. Because of their shared structure and time frame, these eight MQ2 experiments serve as a unique test bed for assessing the strategies, techniques, and possible outcomes of public media 2.0 projects.

American University’s Center for Social Media (CSM) partnered with AIR to develop a survey tool designed to capture various outcomes of these projects. We recognized from the start that

there is not yet enough data available about use of digital media to show us solid trends or allow us to draw firm conclusions relative to public behavior. What follows is an analysis of survey data gathered from each project as well as related best practices and questions for public media 2.0 assessment. We also have made some recommendations for further developing a new methodology to gauge impact for public media.

CSM researchers are particularly interested in examining whether the MQ2 projects meet the criteria for “public media” laid out in their white paper *Public Media 2.0: Dynamic, Engaged Publics*. For CSM, public media projects’ function is to convene “publics”—groups of people using media in democratic societies for the purposes of learning, deliberation, and action around shared issues. Traditional broadcast metrics do not reliably capture such public engagement, so over the course of this research CSM and AIR worked to refine a suite of “elements of impact” to help us begin to determine if publics have formed around a particular public media project.

AIR is interested in identifying best practices (and lessons learned) for producers, stations, and distributors tasked with inventing new media forms. A further goal for AIR is to present concrete “change models” for traditional media organizations seeking to develop their own R & D initiatives. The analysis below examines the role that MQ2 plays as a model for developing infrastructure to support emerging public media production.

The evaluation model proposed in this paper examines impact of the MQ2 projects through several interlocking impact elements: reach, inclusion, engagement, influence, and an unfamiliar new term—“zing,” which marries an older set of production practices designed to move audiences intellectually or emotionally to the new capacity to involve, engage and collaborate with them directly in constructing public media projects.

VI. Recommendations on impact assessment

There is an opportunity to move beyond established standards of success that have defined public broadcasting productions of the past. These standards, such as listener loyalty, were

defined by the limitations of the broadcast technology. The profound evolution of media forms and approaches to craft as demonstrated by projects like MQ2 call for a new vision of who public media users are, what effect multiplatform work has on them, and whether they are being encouraged to learn, debate, and act as informed members of a democracy.

The new vision of public media 2.0 impact moves beyond loyalty or “holding” an individual in place and instead brings into focus individuals who are in motion: responding to the work of producers calling for participation, for example, by inviting them to leave their cars after listening to a broadcast feature in order to go out on their streets to take pictures; to then go online to Flickr and upload those pictures; to take the Flickr link and post it to Facebook or send it out via e-mail. Along the way, the goal is that public media users learn something—that they debate a contentious issue or join a related network—in other words, that they are moved to engage more profoundly in the issues and culture of the day. As a field, public media should provide citizens with the capacity to not only consume information, but also to seek more, to compare notes, to participate meaningfully in public life. And it should be judged primarily on this basis.

Current tools and approaches for assessing whether public media projects are engaging publics in this way are partial and fragmented. Based on the analysis that follows, we offer the following recommendations to the field:

- 1. A new methodology must be developed** for assessing multiplatform public media projects that combine television, radio, online and social media, mobile and other emerging platforms. This methodology should be distinguished from commercial impact assessment schemes in that it prioritizes assessment of public media’s core function—providing content, platforms, and trusted contexts that move users to act as engaged citizens.
- 2. This converged public media impact methodology should incorporate approaches associated with other forward-looking models for assessing impact**—such as the “triple bottom line” standards established for sustainable business—and rely on standards related to

social return on investment and the wider ecology of a given field.

3. **The impact of the public media must be measured not only through quantitative audience and participation metrics, but also through qualitative accounts** such as the role that projects play in the lives of users and communities—whether, for example, they influence public debates—or how decisions made by the creator(s) at the level of craft affect the final outcome of a project relative to impact.
4. **The development of a new public media impact methodology will have profound impact on the culture, language, and practices of the field.** It is therefore imperative that the process be inclusive and transparent, relying on a broad range of input from stakeholders that range from metrics professionals to industry leaders to independent producers to members of the public.
5. **A new entity should be identified or created** whose task is to standardize evaluation of the new elements of impact. It should not be assumed that such an entity will be centered at one organization, but might rather be a collaborative group, with each focusing on a different element of impact.

VII. Summary of AIR members' comments to the FCC

AIR recently conducted its annual membership survey and invited its 760 producers and associates to send responses to four questions relative to the FCC's *Future of Media in the Digital Age*. 37% of those who completed the survey answered one or more of these questions.

Following is a summary.

1. *How would you rate the quality of public media today? How does public media today compare to the past?*

AIR members expressed concern over the overdependence on corporate and individual sponsorship, and also expressed desire for a) convergence between public and community

radio/broadcasting, b) more diversity in programming, and c) integration of newer platforms and Web 2.0 to allow for the public's participation in the making of media.

Though it is of high quality, **public media is not reaching its potential** in the view of most of AIR members responding to our survey. There is room for growth, both in width and in depth. Because of the need to create room for underwriting, and due to the consolidated platforms, programming has become less innovative.

With specific regard to local journalism AIR members indicate that public media is leagues ahead of where it's ever been, but it is threatened due to diversification or disintermediation of platform: this is a critical vulnerability. Though streaming media and podcasts mean the audience is no longer geographically bound, these additional options should be expanding audience choice and **allowing for significantly more risk-taking in programming, yielding greater diversity.** There is an opportunity, in the new age of public media, to **push the envelope on the more cautious or conservative programming offered today.** Public Media in the digital age should, in the view of AIR membership, bring *more* options in programming...more in-depth, long-form programming that is driven and inspired by the story to be told rather than produced to appeal to an anticipated donor audience.

2. *Can you give us an example that illustrates the state of public media today?*

The limitations of bandwidth and the 24x7 shelf space of traditional broadcast platforms, combined with the increased dominance and consolidation of national programs have yielded large national audience. This has, however, come at the expense of local service, and of audience diversity (age, race, class and level of education). One of the more recent "success stories" in public radio, *This American Life* demonstrates how this one program brought in a new, younger generation of listeners. **We need a greater diversity of programming** to appeal to a broader, more diverse range of listeners.

The primary public radio outlets for independent work, as well as acquisition budgets around the country have been impacted by the recession. This has **affected the economy of the independent sector in a negative way**, with an already fragile situation becoming weaker still. Additionally, some communities have had their access to public access television completely eliminated due to the digital conversion, further reducing the options for citizens. There is striking contrast between these grass roots, or producer-driven enterprises and the mainstream public media outlets. In this light, **traditional public media may sound/seem eerily similar to commercial broadcasting**, which is of concern to some AIR members.

3. *What would like us to say to the FCC about the health of public media and what is needed for the future?*

Non-profit media is crucial for a healthy democracy, and government funding is absolutely necessary for the preservation of the integrity of the industry and ensuring net neutrality. Funding is needed to train both new and veteran journalist and media makers the skills to utilize new media platforms necessary the new citizen engagement which marks the new public media world. Increased funding would yield new jobs, new programming, and the diversity the industry and the audience seeks. Expanded funding could, for example, be used to produce more local programming through competitive grants.

Public media is at an unfair advantage with commercial media with respect to royalties for the use of music with both streaming and documentary production, **possibly necessitating modification of the DMCA**. The FCC should enable equal access to all forms of media. We must open up venues of funding and licensing for small public broadcasting endeavors in local markets and re-direct public media funding for digital and online productions in the interest of garnering younger, more diverse, and larger audiences who deserve to be part of the public media landscape of information. Overall outreach to broader, more diverse communities is needed. Public media can step in and provide necessary content for the democracy -- but it needs

the social contract around it to deliver adequate financial support, adequate training and equipment, and adequate bandwidth to all Americans.

4. *Do you have any suggestions about what might be done to assure that all Americans receive quality, verified, information on which to make decisions about their lives and government?*

The FCC should create initiatives for existing public media outlets and production houses to produce more multi-platform content (e.g., train low power FM stations and public access TV to utilize Web 2.0 or create an internet stream, etc.), **and allocate more spectrum space for non-commercial and educational radio and TV stations.** Also, as radio and television moves from terrestrial to digital, **investments should be made to ensure equal access to public programming at all income levels,** and universal access to broadband Internet access should be considered, as well.

We should move towards devising a method for **press accreditation for Internet producers and assure that shield laws are amended to apply to the workers in this new medium.**

If we want media that is thorough and accountable, the system has to be accessible and accountable, and intervention must be provided allowing groups underrepresented in the media to tell their stories and for others to hear or see these points of view.

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