

## Process of Challenging Television License Renewal.

All of the TV stations licensed to Hawai'i filed their license renewal applications with the FCC on Oct. 1, 2014. The applications should be available in the stations' online public files after that date. While someone will need to review them, they are unlikely to provide much useful information.

Petitions to deny are due January 2, 2015, but as a practical matter, the petition will need to be in final form by December 12 because of our attorney's academic schedule. While we will draft the petition, we will need signed (under penalty of perjury) declarations from residents of the stations' service area explaining how they would be harmed by the renewal of the licenses as well as supporting factual allegations. Thirty days after the petition is filed, the stations file oppositions, and then we have twenty days to respond. When the FCC acts on the petitions is anyone's guess. If the FCC has not yet acted on the KFVE transfer, that might provide some incentive to act more quickly than usual because generally a license that has expired will need to be renewed before it can be transferred.

## Substance of Petition to Deny

Describe your organization and its history, membership, importance in the community, need for information about public issues, and that it is in the area served by these stations and that license renewal will harm the community.

- In 2009 Raycom Media of Alabama engineered a takeover of 3 television stations in Hawaii. It is clear that Raycom has outright ownership of both the NBC (KHNL) and CBS (KGMB) stations and exerts total control over a third station, KFVE. **Note: if you or your organization supported the original complaint for emergency relief filed by Media Council Hawaii in 2009, indicate that here and add that as a result of FCC inaction, our fears about harm to our community have been realized!**
- The immediate result was the layoff of more than 60 staff and the closing of one newsroom. Raycom ended up with direct ownership of both NBC and CBS affiliates, and de facto ownership of KFVE. Raycom now produces, *Hawaii News Now* and simultaneously presents the same local newscast on both NBC and CBS channels and presents essentially the same newscast at different times on KFVE.
- The long range result is that our community has suffered a loss of diversity of opinion, less coverage of significant local issues, reduction of enterprise reporting and a general homogenization of information. These results have been documented by an independent University of Delaware study.
- Raycom Media now dominates the market, and this state of diminished competition, weakens the ability of minorities, women, and local interests to acquire station ownership or even to aspire to become media owners.

- Our community is small but ethnically diverse and this one size fits all approach does not address the full range of local issues, nor does it reflect the rich diversity of our community. Note: add data about your organizations membership and if possible a concrete example of issues ignored or skewed to a single perspective.
- Media Council Hawaii and Common Cause Hawaii and have documented that during the last (2012) election cycle, *Hawaii News Now* rarely covered races for the legislature or city and county election contests. We also perceive that Hawaii News Now follows the trend of substantially less reporting of the State legislature and city and country council activities.
- Further, it has been demonstrated that paid political advertising on *Hawaii News Now* during newscasts equal or surpasses actual political reporting.
- Given our concern about lack of robust news coverage of our community, and general lack of diverse editorial viewpoints, we are deeply troubled that the only mass circulation print media, the Honolulu Star Advertiser, and Hawaii News Now list each other as “media partners”. We would like the substance of this partnership to be made public to understand if it violates the rule against cross ownership.
- We live in a community where monopoly forces exert tremendous control over the free flow of information. Raycom media unfairly dominates the television broadcast market, and *The Honolulu Star Advertiser* dominates print media. There is a lack of genuine competition. There are a few Internet based information sources, but their combined audiences are very small compared to the power of Raycom.

For all these reasons, we ask the FCC to deny renewal of the licenses of KGMB, KHNL, and KFVE. A return to a, more diverse, competitive and locally focused media environment is sorely needed in this community. We believe that should these licenses be available, that there is a real possibility of local acquisition of ownership. At the very least it will encourage a more diverse media environment. Our community deserves nothing less.

Signature