



AMERICANS FOR DEMOCRATIC ACTION

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November 30, 2014

Received & Inspected

DEC 8 2014

FCC Mail Room

Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 Office of the Secretary  
 445 12th Street, SW  
 Washington, DC 20554

Re: Renewal numbers:  
 KFVE: BRC DT - 20140930AFX  
 KHNL: BRC DT - 20141001CEM  
 KGMB: BRC DT - 20141001CDU

Americans for Democratic Action/Hawaii is writing to challenge the renewal of the licenses for TV stations KHNL (NBS), and KGMB (CBS) and KFVE.

Americans for Democratic Action (ADA), founded in 1947, is a national independent liberal political organization dedicated to promoting individual liberty and economic justice, working toward civil rights at home and human rights abroad, and for the promotion of the general welfare in a world of peace. As the local chapter of that organization, Americans for Democratic Action /Hawaii shares in this mission and seeks to implement it primarily on a local, Hawaii level. A major focus of our activity is providing testimony at the state legislature supporting or opposing bills that impact the wellbeing of the general public. As such, the availability of public information on issues is essential.

We depend heavily on the news media to keep our membership informed about issues, such that we have a basis for prioritizing issues on which to act. The consolidation of news media in Hawaii over the past several years has had a negative impact on our activities. Lacking diversity of outlooks and especially investigative reporting, much that happens reaches our attention only after it is too late to respond.

In 2009 Raycom Media was allowed to take over three television stations in Hawaii—outright ownership of both the NBC (KHNL) and CBS (KGMB) stations in addition to exerting total control over a third station, KFVE. Americans for Democratic Action Hawaii was one of the many organizations in the community served by these stations that supported the effort by Media Council Hawaii to stop the merged operations.

We believe that the immediate layoff of more than sixty staff and the closing of one newsroom seriously impacted the public's ability to understand and follow public issues. Raycom now produces, *Hawaii News Now*, which simultaneously presents the identical local newscast on both NBC and CBS channels and presents essentially the same newscast at different times on KFVE, which lacks its own news staff.

Although our state is very diverse ethnically and geographically, the resulting homogenization of information ignores the richness of Hawaii's culture. Local issues and events receive less coverage than would be the case with three competing TV stations, and the diversity of opinion arising from this ethnic diversity is nearly absent from the public airwaves. There is little investigative reporting as well. Raycom Media's domination of 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.

For example, Americans for Democratic Action/Hawaii is especially concerned with the poor coverage of issues before the State Legislature and County Councils and of election campaigns. For example, our organization is concerned about the welfare of low-income individuals. However, in the 2014 legislative session, TV news on these stations provided some coverage of the discussion on raising the minimum wage, but failed to cover the package of bills that would have cut taxes on the poorest people in our state. As a result, legislators were able to ignore these bills without substantial accountability to the community they represent.

Hawaii has the lowest or one of the lowest rates of voter turnout in the country. We believe this is in large part due to lack of information on political issues and the positions of candidates, both prior to and during election campaigns. With respect to coverage of political campaigns, one of our members participated in a local study on the TV coverage of campaigns and issues during the last weeks of the 2012 election cycle. With the exception of the Honolulu mayoral race, *Hawaii News Now* rarely mentioned races for the legislature or city and county offices. Even the reporting on the Honolulu mayoral race was devoted primarily to the emergency hospitalization of one of the candidates! Issues were rarely mentioned at all, let alone discussed in depth.

Further, the study found that paid political advertising on *Hawaii News Now* during newscasts equaled or surpassed political reporting, even when political reporting was defined as any mention of a political figure—local, state, national or international—whether or not they were currently running for election.

With respect to lack of investigative or in-depth reporting, this week's news included reports of the City of Honolulu evicting Micronesians from a park and the State of Hawaii being granted the right to refuse Medicaid to Micronesians, but without any background on why Micronesians are here in the first place and why they are poor. Such a lack in reporting raises inter-ethnic tensions, prevents the public from looking for alternative solutions, and only contributes to the woes of Micronesians.

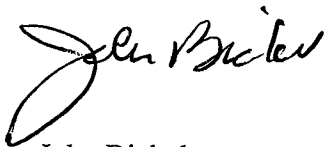
Other omissions by the Raycom's news include stories about the lawsuit against Calvin Say for not living in his district, alternatives to military jobs for Hawaii, and weak coverage of the constitutional amendments on the most recent ballot.

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*, as the State's only statewide daily newspaper, dominates print media. There is a lack of genuine competition. Although there are a few Internet based information sources, each of them reaches only a small portion of the general public and results in segmented understanding of public issues. The very concept of a public understanding and consideration of issues is undermined by the lack of in depth reporting and discussion of issues.

We believe that Raycom, while using the public airwaves, has failed in its responsibility to the public, as indicated above. For that reason, we ask the FCC to deny renewal of the licenses of KGMB, KHNL, and KFVE.

A handwritten signature in black ink, appearing to read "John Bickel". The signature is fluid and cursive, with a large initial "J" and "B".

John Bickel  
President, ADA Hawaii