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

Received & Inspected

DEC 08 2014

FCC Mail Room

Re: Renewal numbers:

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

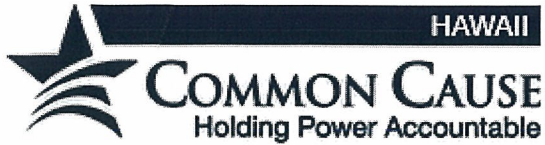
Dear Ms. Dortch and members of the FCC:

Common Cause Hawaii (CCHI) is writing to object to the license renewal for TV stations KHNL, KGMB, and KFVE, located in Honolulu, on grounds that these stations have failed to adequately serve the community. In exchange of their right to use the public airwaves, media has a civic responsibility to report on and raise awareness of pressing local issues. However, the consolidation of local news across the three stations has severely restricted competition between newsrooms, and has resulted in depleted news coverage of local events and issues.

Common Cause Hawaii (CCHI) is the State chapter of Common Cause, a national non-partisan organization founded in 1970 as a citizens' lobby. CCHI has been active in Hawaii since the mid-1970s and has 4,000 members and supporters, including persons on all islands. Both at the national and the local level, the organization focuses on increasing voter participation and civic participation in government, reducing the influence of money in politics, and advocating for openness and transparency in government. With these foci, it is essential that we and our membership have substantive and timely information on public issues.

CCHI was one of the organizations that objected in 2009 to the merger of two Raycom Media stations (KHNL and KGMB) and the broadcast of the same news on a third station, KFVE, which does not have any news staff of its own. We feared at that time that the merger would reduce news coverage in Hawaii, and indeed it has, with the immediate layoff of more than 60 staff and closing of one newsroom. Given that each independent news staff would have made its own decisions about what news to cover and how to cover it, the consolidation of news across three TV stations greatly decreases that variability—a variability that is essential to having thorough coverage and a comprehensive picture of events. Without it, there is a homogenization of the news that does not serve the public interest. A University of Delaware study (*Local TV & Shared Service Agreements: Examining News Content in Honolulu*, D. Yanovich, February 2011) documented that the number of local news stories dropped significantly after the merger of the three TV news programs. Stories on local issues dropped by 19%, while the time devoted to them dropped by 43%. While news stories related to government and politics increased from 11% to 16% of the total, the time spent on them dropped by 44%.

The weakness of news reporting also became evident in a study CCHI members participated in after the 2012 elections. The study found that the merged news program, *Hawaii News Now*, rarely, with one exception, addressed issues in the races for the State legislature or City/County Councils. The issue of whether to build a rail system on Oahu received coverage, but the



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enormous range of other issues facing the County and the State were largely ignored. Indeed, the amount of time spent on political advertising equaled or surpassed that spent on political reporting in the final weeks of the election period—even when *any* mention of *any* politician, local, national or international, and whether running for office or not, was included in the category of “political news,” as was the extensive coverage of the brief hospitalization of one of the candidates for Governor. Although we did not repeat the study, we believe that the same trends continued in the 2014 elections. In between, we saw little coverage of issues before the State legislature and county councils.

Hawaii chronically has one of the lowest voter participation rates in the nation. We believe that what has been termed “voter apathy” is in fact, lack of voter knowledge about the political decisions that impact our daily lives. We believe that our efforts to increase voter participation are hampered by the failure of these three stations to adequately report on political news.

Although some people now depend on local online blogs and electronic news from online news platforms such as Civil Beat, none of these sources has the extensive viewership that television has. And even if these other sources were adequate, we do not believe that it excuses these TV stations from their civic responsibility—which they are pledged to serve in recognition of their right to use the public airwaves.

For these reasons, we believe that KGMB, KHNL and KFVE are not adequately serving our communities and ask the FCC to deny renewal of their licenses. Hawaii needs a diverse and competitive news environment that focuses attention on local issues, which these stations have not delivered on.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carmille Lim".

Carmille Lim, Executive Director
Common Cause Hawaii

cc: Media Council Hawaii