

PANEL DISCUSSION OF THE REPORT OF THE TECHNICAL COMMITTEE ON BROADCAST RATINGS

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I should like to clarify at the outset the interest of the Commission in broadcast ratings. We don't subscribe to any service. Our interest in this area is basically different from that of networks, stations, or agencies.

We are interested in the subject of ratings as it bears on our general responsibility to license and regulate stations in the public interest. In carrying out this mandate, we are required to keep ourselves informed on the structure and functioning of the broadcast industry. This is necessary both as the basis for formulating our own general policies and practices, and to provide Congress with expert information. Specifically in the matter of ratings, it was the Subcommittee on Communications of the Senate Interstate and Foreign Commerce Committee that initiated a public hearing on the subject in June 1958. Subsequently, the Special Subcommittee on Legislative Oversight of the House Committee on Interstate and Foreign Commerce, in March 1960, called on the American Statistical Association to undertake a technical evaluation of ratings. The Commission, as the expert government agency in the field of broadcasting, must be prepared, if called upon, to provide Congress with its independent views on this subject.

Aside from its responsibility to Congress, the Commission has an interest in ratings insofar as it bears on the output of the broadcasting industry. Let me make clear that the Commission does not censor individual programs. This is specifically excluded by the Communications Act. We are concerned with programming service in a more general way: The extent of program balance (for example, as between entertainment and other types of programs), the degree of diversity in program choices, and the forces that promote or hinder overall program improvement in the public interest.

Ratings obviously play an important role in the programming decisions of broadcast stations and networks. We know that, by and large, a high-cultural program does not regularly make the top 10 or 20 Nielsen or Arbitron. We don't blame the surveys for this result: It reflects a highly skewed distribution in public education, tastes, and TV usage. While I recognize that most of the time stations for economic reasons must serve the majority audience, they have an obligation also to serve minority tastes. If an Eisenhower interview, for example, reaches 7 and 1/2 million people, as compared with 25 million reached by each of

two alternative network programs, we don't have the same adverse reaction as the network programming the Eisenhower interview. There are few alternative single organs of communication which could attract 7 and 1/2 million people.

Currently, we are conducting an inquiry into the general area of program selection, particularly at the national level. This proceeding has been going on since October 1958, and we have had testimony from writers, program producers, networks, advertising agencies, talent, and other segments of the broadcasting industry. Various witnesses have referred to the role of ratings in the selection or rejection of network programs. In a further hearing, beginning January 23, 1962, we have specifically requested the networks to discuss in detail their use of rating information and the effect of such use on the ultimate composition of the network schedules.

In addition to our broad affirmative responsibility to improve programming service in the public interest, we also have a responsibility to root out abuses and undesirable practices reflecting unfavorably on the character of broadcast licensees. This is a responsibility which, in some aspects, we share with other governmental bodies. Currently, we are cooperating with the Federal Trade Commission which is inquiring into certain alleged abuses involving station claims as to rating results as well as to the objectivity of certain rating operations.

I hope that this brief statement clarifies our interest in broadcast ratings.

I am very happy that Congressman Harris undertook to enlist the support of the ASA in obtaining a technical evaluation of the rating services. This is a subject fraught with emotional reactions. Typically, the word "ratings" in governmental circles bring a negative response in a spectrum ranging from those who are not persuaded that ratings have any validity to those who are convinced that they are the devil's work and the source of all evils in broadcasting. A great value to me personally of the ASA report is that now I have an authoritative reference source that I can cite. This may not convince non-believers but at least it shifts the burden of proof. It helps greatly to be able to say that a group of recognized and uncommitted statistical experts satisfied themselves that the national rating services are, by and large, valid for the purposes for which they are normally used

^{1/} The views expressed are those of the author and not necessarily of the F.C.C.

The Report has another value. After disposing of irrelevant and uninformed criticisms, it brings into focus very real problems which exist in this area. Certainly I agree that considerably more research into methodology is required; that more needs to be known about the uses to which the data are put; and that considerably more information should be published as to the size of sample, the sampling error, extent of non-responses, and adjustments, if any, in the responses. We agree also that an area in which considerable improvement is needed is in local ratings, particularly in smaller markets. Most important, I feel, is the need for an Office of Methodological Research, properly staffed and properly financed.

I should like to underline some areas which are mentioned in the Report but not fully developed. There is considerable dissatisfaction in the radio industry with respect to ratings. As the Report indicates, the fractionalization of the audience resulting from the great number of radio stations and the difficulties of accurately portraying out-of-home listening have created very great technical problems in economically and effectively measuring the audience for a particular radio station. In addition, the intense competition among stations resulting from the great expansion in the number of stations has put a premium on being first in the market. I have heard from a number of stations that despite the technical shortcomings of the radio ratings (resulting from low ratings, small samples, multiple sets, and out-of-home listening) advertising agencies place great emphasis on such ratings in buying national spot time. The stations feel very strongly a need for improvement in radio ratings. Ardent, free-enterprise broadcasters, who resent the Commission's attempts to obtain more detailed data on programming in the public interest, have suggested that the Commission itself undertake ratings or at least establish standards of good survey practice.

We have concern in assuring ourselves that the ratings are "honestly" drawn and "honestly" used. But our basic concern is rather with research which will throw light on the uses of broadcasting to serve long-range citizen needs. As one recent publication in the field stated:

One of the discouraging aspects of present conditions in American broadcasting is that the industry is conducting almost no research into the long-range, fundamental influences of the media. In the twentieth century our missiles are guided, but our radio-television transmissions have no

comparable sense of direction. Large sums are being spent to measure audiences and to discover how best to sell products to them, but there is almost no careful study of the overall impact of the media on our society. Network executives have speculated publicly about the desirability of such an investigation, but so far it has had a very low priority. Of course the presuppositions and design of such a study would be of tremendous importance. A superficial job would be worse than none because it would be dangerously misleading.

The Commission has no funds for conducting such research. It is conceivable, however, that the Office of Methodological Research properly conceived and properly financed could play an important role in this connection.

Broadcast communications act on the individual as only one of many stimuli, their specific effects are not readily discernible, and may differ in influence substantially as between the long-run and the short-run, and as related to various demographic factors. I am hopeful that the broadcast industry in its professional capacity will some day launch a full-fledged, long-range, perhaps ASA-certified study on the effects of broadcast media. Meanwhile, however, the Office of Methodological Research when established might concern itself with this question: How can the regular continuing audience surveys be used to provide more detailed and reliable information on the selection of programs by various subgroups within the general population, consistent with continuing commercial patronage of the surveys? For example, can audience composition data by age, sex, income, occupation, and education be refined further to provide meaningful profiles of the viewing patterns of various identifiable groups in the community (viz. community leaders, etc.)?

I am sure that a number of other lines of inquiry will present themselves to an Office of Methodological Research. This office might well be part of a larger center for broadcasting research. I am heartened by the expressed interest of leaders in the broadcasting industry to take a more positive role in promoting and stimulating and financing research directed not only to the media's commercial effectiveness but its role in furthering the public interest. I recognize that substantial sums of money are involved but I am hopeful that the broadcast industry, including networks, stations, advertisers, and agencies will take a broad and realistic view of their long-term enlightened self-interest. It is not inconceivable that such research may help to improve the industry's output in the long run.