

**STATEMENT OF
COMMISSIONER ROBERT M. McDOWELL**

RE: Promoting Diversification of Ownership in the Broadcasting Services, 2006 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, 2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, Cross-Ownership of Broadcast Stations and Newspapers, Rules and Policies Concerning Multiple Ownership of Radio Broadcast Stations in Local Markets, Definition of Radio Markets, Ways to Further Section 257 Mandate and To Build on Earlier Studies *Report and Order and Fourth Further Notice of Proposed Rulemaking*, MB Docket Nos. 07-294, 06-121, 04-228, and 02-277 and MM Docket No. 01-235, 01-317 and 00-244, FCC 09-33

Over the years, an array of groups from across the political spectrum have criticized the Commission’s systems and methodologies for collecting and maintaining broadcast ownership data. Debates over policy, and the important subsequent decisions that often emerge, should be firmly grounded not only in law but in solid facts as well. Rendering rules on an unsure factual foundation is akin to building a house on quicksand. Today, the FCC attempts to improve our fact-gathering as we pursue our obligation to improve our understanding of diversity of ownership in the traditional media marketplace. As the expert government agency, we should provide both policymakers and the public with station ownership statistics that are more precise and reliable.

I look forward to receiving comment on proposals to make our data more comprehensive as well, including recommended approaches to account for ownership of noncommercial stations, which have considerable variation in their licensees’ organizational structures.

What today’s action does not do, however, is change our existing broadcast attribution rules. To do so now, in the midst of such economic uncertainty, would be foolhardy. As I continue to advocate for a regulatory environment that is more attractive to private investment, I am interested in hearing from commenters as to whether the changes to Form 323 would impose any inadvertent negative effects.

In sum, although I do not entirely agree with every word in the item, I support this action and I look forward to reviewing the information that it will yield.