

Diversity Policies in the Media Marketplace: A Review of Studies of Minority Ownership, Employment, and Content

DAM HEE KIM¹
University of Michigan, USA

Achieving diversity has long been a goal of U.S. communications policy. However, the diversity and minority preferences governing the Federal Communications Commission's broadcast ownership policies have been challenged on the basis of doubts concerning the assumed nexus of minority ownership, a diverse workforce, and content: the *triangle*. Acknowledging the lack of consensus regarding whether the triangle actually exists, this article reviews previous studies (the majority of which adopted quantitative methods) and suggests some support for the nexus. Building on prior scholarship, this article suggests that future studies can adopt qualitative methods to provide explanations for the nexus by investigating broadcast station stakeholders, content, and the audience, and systematically collect longitudinal, industry-wide datasets to establish causal inferences of ownership, employment, and content.

Keywords: media diversity, FCC, minority ownership, employment diversity, content diversity

Diversity has long been a central goal of U.S. communications policy (Horwitz, 2005; Napoli, 1999, 2011). The importance of diversity in communications policy rests on the metaphor of the open marketplace of ideas, whereby a media environment with diverse views available is desirable for a healthy democracy (Neuman, 2010).² In fact, it is a public right to receive a diversity of views and information over the airwaves. This right was reiterated by Justice Black when he emphasized "the widest possible dissemination of information from diverse and antagonistic sources" for the sake of public welfare in regard to the First Amendment (*Associated Press v. United States*, 1945). Accordingly, not only is promoting a diversity of views and information an important First Amendment value, it is also a paramount governmental objective. This objective can justify certain Federal Communications Commission

Dam Hee Kim: dheekim@umich.edu

Date submitted: 2013-08-31

¹ This project was initiated during the author's summer research at the Federal Communications Commission, which was made possible through the generous support of the Consortium on Media Policies Studies (COMPASS) fellows program. The author genuinely thanks Mark Lloyd for his guidance and Russ Neuman, S. Mo Jang, and Josh Pasek for their comments on earlier versions of this project.

² The marketplace of ideas metaphor was first used by Justice Holmes in the dissenting opinion in *Abrams v. United States* (1919) (although he did not coin the exact term); he argued for the need to have both agreeable and hateable ideas in the marketplace to reach the ultimate good for our society.

(FCC) policies designed and implemented to promote a diversity of views and information (*Metro Broadcasting v. FCC*, 1990).

In response to the reform movements of the late 1950s and 1960s, the FCC adopted minority-preference policies to support a diversity of views and information.³ These policies essentially promoted minority ownership of and employment in broadcast stations, in line with the public interest standard, which was adopted in the Communications Act of 1934. The FCC's minority preference policies were also in part triggered by societal realization of the serious underrepresentation of minorities in broadcast station ownership (Austin, 2011). Minority underrepresentation was thought to contribute to insufficient diversity of views and information, which was perceived as disadvantageous not only for minority audiences but also for general audiences (the public) (Hammond, 1991).

However, in the 1980s, the FCC's minority-preference policies started to be challenged in courts largely because of doubts concerning the assumed nexus of minority ownership, employment, and content: the *triangle*.⁴ These doubts had arisen because the FCC had designed and executed structural regulation governing broadcast ownership (Baker, 2007; Einstein, 2004) and employment, aiming to promote a diversity of views and information. The FCC's commitment to structural regulation was understandable considering that it could not directly regulate content because of the anticensorship constraints of the First Amendment. However, if there were no associations (let alone causal relations) among minority ownership, employment, and content, the policies governing broadcast ownership and employment might not be justified.

Indeed, concerns were subsequently raised regarding the assumed nexus of minority ownership, employment, and content. For example, in *Metro Broadcasting v. FCC* (1990) one of the most challenging arguments raised by Justice O'Connor in her dissenting opinion revolved around whether there was an association between minority owners and content geared toward or appreciated by minority audiences, because the FCC had not presented data conclusively demonstrating such a link.⁵ The doubts about the alleged association eventually led the FCC's minority-preference policies regarding employment in broadcast stations to be discarded in *Lutheran Church—Missouri Synod v. FCC* (1998) and *MD/DC/DE Broadcasters Associations et al., Petitioners v. FCC* (2001). The FCC Diversity Order, which promotes diversification of broadcast ownership and thus can be seen as another minority-preference policy, is still being challenged (FCC, 2014b; *Prometheus Radio Project v. FCC*, 2004, 2011). Arguments challenging the

³ Examples include the consideration of minority ownership and participation in management in comparative hearings (1973), a minority tax certificate program, and a distress-sale program (1978) (Austin, 2011).

⁴ The doubts concerning the triangle are situated within the larger debate over the constitutionality of the affirmative action policies, specifically with regard to the sometimes conflicting directives of the First and the Fourteenth Amendments (see Hammond, 1991; *Metro Broadcasting Inc. v. FCC*, 1990).

⁵ Another significant argument involved the use of racial classifications in policies. There had long been rhetorical battles within the FCC as well as between it and the courts regarding the presumed nexus between minority ownership and content diversity and whether it was a kind of ethnic stereotyping.

policy generally address the nexus of minority ownership, employment, and content: scholars and policymakers have reached no consensus about whether such a nexus exists (Hammond, 1998).

Thus, in an effort to assess the existing research regarding the triangle of minority ownership, employment, and content, this article reviews previous studies on the issue of media ownership that were either funded by the FCC or recognized by the courts. These studies include the 2010 Media Ownership Studies as a part of 2010 quadrennial media ownership proceedings, the Media Ownership 2006 Research Studies as a part of the FCC's comprehensive review of its broadcast ownership policies, 2003–2006 Additional Materials, the studies presented in the 2000 Policy Forum on Market Entry Barriers Faced by Small Minority and Women Owned Businesses in the Communications Industry, and the studies recognized in *Metro Broadcasting v. FCC* (1990). Of the 100 empirical studies identified, a total of 42 of studies relevant to the triangle were individually read and reviewed. By reviewing these studies, this study seeks (a) to tabulate the findings about the nexus of ownership, employment, and content; (b) to assess the general strengths and weaknesses of the studies; and (c) to offer suggestions for future analyses.

In the following sections, studies conducted on each side of the triangle are reviewed separately, and suggestions for future research are made. Then, further suggestions for future research on all three aspects of the triangle are discussed. This article seeks to contribute to the debates about the FCC's minority-preference policies and, more broadly, its diversity policies. It is hoped that this article successfully presents conclusions from empirical evidence accumulated so far and can usefully direct future research to further inform the FCC's policy design.

A Review of the Literature on the Triangle

Studies of the Nexus Between Minority Ownership and Employment

Since the 1980s, several studies, listed in Table 1 (Bachen, Hammond, Mason, & Craft, 1999; Fife, 1986; Honig, 1983; National Association of Broadcasters [NAB], 1986; Schement & Singleton, 1981; Turner, 2007), have repeatedly found a positive relationship between ownership and employment of minorities in radio and TV services. Methods employed by these studies include (a) a secondary analysis of broadcast-industry data collected by government agencies such as the FCC and the NTIA (National Telecommunications and Information Administration) and a research firm, BIA; (b) an analysis of surveys of minority-owned stations; and (c) a content analysis of the frequency of minorities in news staff positions, including reporters and anchors.

Minority-owned stations tended to have more minorities in news and public affairs staff positions than white-owned stations (e.g., Bachan et al., 1999). Even among stations broadcasting minority content, the difference in minority employment between minority-owned stations and white-owned stations was found to persist. Among all stations that geared their content toward Black audiences in 1980, Black-owned stations, compared to White-owned stations, tended to hire Blacks in top jobs (e.g., officials, managers, professionals, and salespersons) and as full-time employees at statistically significantly higher rates (Honig, 1983). Among all 64 radio stations that used Spanish as a primary language in 1980, compared to White-owned stations, Latino-owned stations tended to have a majority of

Latinos as managers at higher rates. Furthermore, Latinos employed at White-owned Spanish-language stations occupied less influential positions than White employees (Schement & Singleton, 1981). According to Fife (1986), even among stations in the same market containing substantial minority populations, minority appearances in various news staff positions in minority-owned stations tended to differ from minority staff appearances in White-owned stations. These differences were statistically significant in three of the four markets analyzed.

Regarding methods, the studies listed in Table 1 involved quantitative analyses. Statistically significant differences in minority employment were demonstrated between minority-owned stations and White-owned stations, with the exception of the Schement and Singleton (1981) study. These differences were, however, found mostly in the radio and TV services, since other services, such as newspapers or newer media, were not included in the analyses. Also, the studies listed in Table 1 adopted rather simple statistical tests, such as chi-square and *t*-tests, and even used descriptive statistics in the cases of Schement and Singleton (1981) and NAB (1986). Although a positive relationship may have existed between minority ownership and minority employment, it is not certain whether minority ownership of stations caused their high rates of minority employment. Some confounding factors not included in these analyses could have caused the difference in minority employment between minority-owned and White-owned stations.

For example, market characteristics (such as a ratio of minority population to the total population) may connect minority ownership and employment. For instance, minority-owned stations more frequently than White-owned stations are located in markets with large minority populations, which may explain minority-owned stations' higher minority employment rates. However, Fife (1986) showed that even among stations in the same market, minorities appeared in news staff positions in minority-owned stations at higher rates than in White-owned stations. Also, Honig (1983) and Schement and Singleton (1981) demonstrated the possibility of ruling out content, such as Black and Spanish-language programming, as a confounding factor. It appeared that even among radio stations that aired genres preferred by Black people or primarily using the Spanish language, minority-owned stations tended to hire minorities at higher rates than White-owned stations.

Regarding data, the studies (a) analyzed broadcast-industry data, (b) collected a survey data (Bachen et al., 1999), and (c) executed a content analysis (Fife, 1986). In the first set of studies, the broadcast-industry data were inconsistently collected and, thus, were of dubious reliability despite researchers' effort to cross-check. Regarding the third study, it was meaningful that Fife (1986) demonstrated that minority appearance in positions such as anchors and reporters during newscasts was related to minority ownership. However, the laboriousness of content analysis may have limited the Fife study (1986). It covered only four local markets, meaning that caution needs to be taken in generalizing the findings.

Overall, although the studies listed in Table 1 have repeatedly found a relationship between minority ownership and employment, they demonstrate scant explanation for what leads to the difference.

Table 1. The Nexus Between Minority Ownership and Employment.

Nexus	Author(s) (Year)	Data	Method	Service
(a) Analysis of Broadcast-Industry Data				
Yes	Honig (1983)	FCC Form 395 (Equal Employment Report); <i>Broadcasting Yearbook</i> (1980)	Quantitative analysis: statistical tests (chi-square)	Radio
Yes	NAB (1986)	NAB (1986)	Quantitative analysis: descriptive statistics	TV
Yes	Schement and Singleton (1981)	FCC license renewal files	Quantitative analysis: descriptive statistics	Radio
Yes	Turner (2007)	BIA Media Access Pro (2007); the FCC's CDBS (Consolidated Database System) Public Access	Quantitative analysis: statistical tests (<i>t</i> -test)	Radio
(b) Analysis of Surveys				
Yes	Bachen et al. (1999)	Broadcast-industry data from NTIA (1997); telephone interviews of news/public affairs programming directors by a survey firm (1998)	Quantitative Analysis: statistical tests (chi-square and <i>t</i> -test)	Radio, TV
(c) Content Analysis				
Yes	Fife (1986)	Census of Population Report (1980); literature reviews on populations in four sampled markets; newscasts of one minority-owned and one majority-owned station in each of four markets	Quantitative analysis: content analysis	TV

**Suggestions for Future Research on the Nexus
Between Minority Ownership and Employment**

To clarify the nexus between ownership and employment, it might be beneficial to consider the following three suggestions for future research. First, a reliable dataset can be established to include not only ownership and employment information but also some confounding factors that might explain the nexus.⁶ A reliable dataset would allow more statistically solid analyses. Furthermore, were such a dataset systematically collected every year, a longitudinal analysis could be carried out to demonstrate the causal direction of ownership and employment. This would clarify whether minority owners bring about a decision to hire more minority managers and staff or whether a confounding factor, such as a need for content tailored toward minority communities, leads to both minority ownership and employment.

⁶ Suggestions for future studies made in this article build on the prior scholarship and acknowledge insights provided in the existing literature. Suggestions are made to improve upon the weaknesses in previous studies, which seem difficult to avoid given limited resources (e.g., finances, time, and labor) available to researchers at the time of research.

To derive potential factors to be included in the dataset, it might be helpful to explore the reasons why minority-owned stations tended to hire more minorities. Research can be conducted to study the recruitment process of broadcast stations. Such studies could involve interviews with owners regarding their hiring preferences and practices. Also, interviews can be conducted with managers to investigate whether certain recruitment philosophies or criteria are derived from the owners, and organizational documents delineating such recruitment criteria can be examined. Additional interviews could be carried out with employees regarding their perception of why they were hired.

It would also be beneficial to include in the analysis differences in jobs within a station to better understand the nexus. For example, researchers can check whether the levels or ranks of jobs and their tasks, such as management and production (Schement & Singleton, 1981) or on-air jobs (Fife, 1986), are relevant.

***Studies of the Nexus
Between Minority Employment and Content***

The studies of the relationship between minority employment and content are listed in Table 2. Analyzing the FCC's 1980 broadcast-industry data, Honig (1983) found that radio stations airing Black radio programming tended to hire Black employees at higher proportions than radio stations without Black programming in the same market. Bachen et al. (1999) interviewed news and public affairs programming directors by telephone and found a nexus between ethnic composition of newsroom staffs and the programming diversity in both radio and TV services.

Table 2. The Nexus Between Minority Employment and Content.

Nexus	Author(s) (Year)	Data	Method	Service
Yes	Bachen et al. (1999)	Broadcast-industry data from NTIA (1997); telephone interviews of news/public affairs programming directors by a survey firm (1998)	Quantitative analysis: statistical tests (chi-square, <i>t</i> -test, stepwise multiple regression)	Radio, TV
Yes	Honig (1983)	FCC Form 395; Broadcasting Yearbook (1980)	Quantitative analysis: statistical tests (<i>t</i> -test)	Radio

Although positive relationships between minority employment and minority content were shown (Bachen et al., 1999; Honig, 1983), the causal direction remains unclear. Honig (1983) suggested two possibilities: First, minority employees were involved in the station's decision-making to air programming to serve minorities. Second, noting that certain minority communities were not being served, stations hired minorities to provide programming tailored toward those minorities. However, back in the 1980s, the FCC imposed Equal Employment Opportunity (EEO) requirements, and Honig (1983) put more weight on the first possibility, that minority employees hired through EEO requirements contributed to the production of programming serving minorities.

Bachen et al. (1999) conducted a regression analysis and showed that the ratio of minority staff in a station's news and public affairs team was statistically significantly related to programming diversity even when factors such as owner race, owner involvement, station revenue, and ownership structure were controlled for. Nevertheless, since Bachen et al. (1999) relied on survey data, they operationally defined programming diversity as owners' and managers' expressed intentions to serve minority communities. Though Bachen et al. (1999) demonstrated the nexus between ownership and programming diversity, there is still a possibility that what owners and managers intended to promote for minority communities failed to be realized in their content production. Despite their intentions, for instance, because of the "realities of broadcast economics," minority owners may find that producing content covering minority-specific issues, presenting minority talent, and reporting local community news demands many resources and thus becomes difficult to achieve (Fife, 1986, p. 104; Lin, Song, & Ball-Rokeach, 2010).

Suggestions for Future Research on the Nexus Between Minority Employment and Content

Both studies of the nexus between employment and content are dated. It would be beneficial to check the nexus using up-to-date data. To examine the causal direction between employment and content, it would be worthwhile to carry out the following two studies. First, it would be useful to examine minority managers' and employees' involvement in programming decision-making. This can include observations of staff meetings on planning and scheduling of programming, in-depth interviews with managers, programming producers, and other staff as well as analyses of internal documents.⁷ Triangulation of these methods will help researchers investigate whether minority staff, compared to nonminority staff, tend to be influential in programming decision-making in a way that promotes minority content. Since only a small number of stations can be covered, care needs to be taken in sampling stations so that the analysis could be generalizable beyond the markets of the examined stations. Second and more fundamentally, a longitudinal analysis can be conducted to determine the causal direction between employment and content. To run that analysis, employment information of each broadcast station needs to be systematically collected for more than one year, and more reliable ways to measure content need to be devised.

Studies of the Relationship Between Minority Ownership and Content

Since the 1980s, researchers have repeatedly found a positive relationship between minority ownership and content (Bachen et al., 1999; Congressional Research Service [CRS], 1988; Crawford, 2007; Fife, 1986; Ivy Planning Group, 2000; Jeter, 1981; Siegelman & Waldfogel, 2001; Spitzer, 1990; Turner, 2007; Waldfogel, 2011). Only a few studies failed to find it (Erb, 2011; Schement & Singleton, 1981; Stroup, 2007).

⁷ For example, Lin et al. (2010) conducted interviews with ethnic media publishers and editors about their perceptions of the needs of their immigrant audience and their coverage of news stories. Usher's (2014) ethnographic work at *The New York Times'* newsroom could also provide methodological guidance on this line of proposed research.

Listed in Table 3 are the four sets of studies that found a nexus between minority ownership and content targeted to minority communities. These studies used various methods: (a) an analysis of broadcast-industry data; (b) an analysis of surveys and interviews of broadcast owners and managers; (c) a content analysis; and (d) economic modeling. The first set of studies analyzed broadcast-industry data using statistical tests such as regression (Crawford, 2007; Siegelman & Waldfogel, 2001; Waldfogel, 2011) and *t*-tests (Turner, 2007) and demonstrated that minority-owned stations tended to air more programming whose formats were targeted to minorities than White-owned stations did. The programming formats these studies were primarily concerned with included Spanish language, urban, jazz, and religious (Siegelman & Waldfogel, 2001; Waldfogel, 2011). Although difficulties in deriving causal inferences were noted given the unavailability of systematically collected ownership data,⁸ Siegelman and Waldfogel (2001) demonstrated, using longitudinal evidence, that although the increase in minority-targeted programming was small with one additional minority-owned station in a market, it did exist.

The second set of studies in Table 3 showed a nexus between minority ownership and owners' intentions to promote content tailored to minority communities. These studies actually sought the views of owners and managers of broadcast stations by conducting surveys of broadcast station owners (Bachen et al., 1999; CRS, 1988) or in-depth interviews with minority owners (Fife, 1986; Ivy Planning Group, 2000). Minority owners demonstrated clear intentions to target content to the ethnicity of their audiences, were attentive to issues and events of greater importance to minority communities and women, and tended to air programming in languages other than English (Bachen et al., 1999). According to Ivy Planning Group (2000), minority owners were not only seeking profits but were also motivated to serve their communities and to contribute to viewpoint diversity by acting as the voices of communities "who had no voice" (p. 81). Fife (1986) showed that among the managers interviewed in four minority-owned TV stations, three minority staff members took programming approaches designed to serve their minority communities. Specifically, two stations in Texas and in Michigan aired local news and public affairs programming focused on their respective minority communities' events and personalities, and one station in Maine committed itself to cultural pluralism (Fife, 1986).

The third set of studies using content analysis showed how minority owners promoted content tailored to their minority communities. These content analyses specifically evaluated the appearance of minorities in news programming (Fife, 1986) and the political orientation of programming hosts (Turner, 2007) and examined their respective relationships with minority ownership. In minority-owned stations, minorities appeared in the local news items, in newsmaker positions, and in other roles more frequently than they did in White-owned stations in the same market (Fife, 1986). Turner (2007) also found a nexus between minority/female ownership and political orientation of programming hosts. Markets with both

⁸ Based on the correlational analyses, one cannot cast away the possible existence of a confounding factor related to both ownership and content. For example, in *Winter Park Communications, Inc. v. FCC* (1989), racial composition of potential audiences faced by each owner was suggested as a confounding factor. However, CRS (1988) demonstrated that minority owners tended to air content targeted to minority audiences at higher rates than White owners, even when White owners' rates of broadcasting for minority communities equaled their respective markets' ratios of minority population to the total population.

conservative and progressive hosts were more likely to have minority-owned stations than markets with only one or the other (Turner, 2007). In addition to the third set of studies reviewed in this article, other studies cited in *Metro Broadcasting v. FCC* (1990) found a nexus between minority ownership and news coverage. In Boston, owners of different races appeared to treat events dissimilarly (Johnson, 1987), and in Detroit, Black-owned stations covered racially significant issues more frequently than White-owned stations (Fife, 1979).

In the final study, Spitzer's (1990) economic modeling provided two possible and not mutually exclusive explanations for the positive relationship between minority ownership and programming. One explanation was that in producing programming targeted to their own groups, minority owners were willing to surrender some profits in service to the solidarity with these groups. The other explanation was that doing so brings cost advantages to minority owners: Minority owners would have an advantage in assessing their programming targeted to the communities they belong to thanks to their familiarity with cultural trends, social customs, and languages such as Spanish.

Table 3. The Nexus Between Minority Ownership and Content.

Nexus	Author(s) (Year)	Data	Method	Service
(a) Analysis of Broadcast-Industry Data				
Yes	Waldfoegel (2011)	Station-level data from Arbitron (2005, 2007); LongitudinalRadio_Long.dta from the FCC	Quantitative analysis: statistical tests (regression)	Radio
Yes	Crawford (2007)	Ownership data from Diwadi, Roberts, and Wise (2007); programming data from Nielson; Program schedule from TMS (Tribune Media Services); ratings from Nielson and Kagan Media Research; advertising minutes from TNS (Taylor Nielson Sofres) (two weeks of every year between 2003 and 2006)	Quantitative analysis: statistical tests (regression)	TV
Yes	Turner (2007)	Ownership data from BIA Media Access Pro (2007); the FCC's CDBS Public Access; radio talk show host information from program websites (2007)	Quantitative analysis: statistical tests (<i>t</i> -test)	Radio
Yes	Siegelman and Waldfoegel (2001)	Duncan's American Radio; listening data from Arbitron; minority ownership data from NTIA (all 1993, 1997)	Quantitative analysis: statistical tests (regression)	Radio

Yes	Jeter (1981)	Black-oriented stations data from Standard Rate and Data Service by Spot Radio; Black-owned stations data from the NAB, the NABOB (National Association of Black-owned Broadcasters), and Black Enterprise; broadcasting of programming data from the FCC's license renewal applications; playlists from a survey	Quantitative analysis: statistical tests (regression)	Radio
(b) Analysis of Surveys and Interviews of Owners and Managers				
Yes	Bachen et al. (1999)	Broadcast-industry data from NTIA (1997); market information from Duncan's American Radio (1996) and Broadcasting and Cable Yearbook (1997); telephone interviews of news/public affairs programming directors by a survey firm (1998)	Quantitative analysis: statistical tests (chi-square and t-test, stepwise multiple regression)	Radio, TV
Yes	Ivy Planning Group (2000)	Telephone interviews with 120 key persons representing small, minority- and women-owned businesses; 30 telephone interviews with key market participants by Ivy (2000)	Qualitative analysis: interpretation of interviews	Radio, TV, wireless
Yes	CRS (1988)	A survey of radio and TV stations by the FCC	Quantitative analysis: descriptive statistics	Radio, TV
Yes	Fife (1986)	Census of Population Report (1980); literature reviews on populations in four sampled markets; structured interviews at the minority-owned stations; newscasts of one minority-owned and one majority-owned station in each of the four markets	Qualitative analysis: interpretation of interviews	TV
(c) Content Analysis				
Yes	Turner (2007)	Ownership data from BIA Media Access Pro (1007); the FCC's CDBS Public Access; radio talk show host information from program websites (2007)	Quantitative analysis: statistical tests (<i>t</i> -test)	Radio
Yes	Fife (1986)	Census of Population Report (1980); literature reviews on populations in four sampled markets; newscasts of one minority-owned and one majority-owned station in four markets	Quantitative analysis: content analysis	TV
(d) Economic Modeling				
Yes	Spitzer (1990)	Review of theories and evidence of programming choices by profit-maximizing owners	Economic modeling, review of opinions in <i>Metro Broadcasting</i>	Radio, TV

Listed in Table 4 are a few studies that did not find a nexus between minority ownership and either having more local news minutes on a station (Erb, 2011) or being a news station (Stroup, 2007).⁹ These results possibly support such claims that there were no significant differences between stations owned by minorities and those that were not, and thus there is no need for policies to increase minority broadcast ownership. Nevertheless, it seems questionable whether having more news minutes or being a news station are meaningful differences between minority-owned stations and those that are not. To be specific, questions remain whether minority-owned stations are expected to air a greater quantity of news. Referring back to the rationale that minority-preference policies were adopted to support more diverse views and information, it would not be simply more news minutes but rather an increase in different perspectives in news that minority-owned stations offer. More thoughts and discussions are needed among scholars and policymakers regarding what kind of content difference our society needs and expects from different station owners. Other studies listed in Table 4, however, demonstrated opposing results that minority-owned stations indeed aired more local news (Crawford, 2007; Rennhoff & Wilbur, 2011; Turner & Cooper, 2007).

Regarding methods, the first set of studies in Table 3, using quantitatively solid methods, analyzed broadcast-industry data covering a large geographic area. However, because of the limitations inherent in the industry dataset, the analyses covered only one service, such as TV or radio, or covered two services separately. Focusing on differences in programming formats, the first set of studies successfully demonstrated that minority-owned stations tended to air more Spanish-language or Black, urban, ethnic, or jazz programming than White-owned stations did. Nevertheless, the studies did not examine the possible existence of other meaningful differences within each programming format (e.g., in news programming, whether more issues significant to minority communities received attention).

The possible differences within the news programming format between minority-owned stations and white-owned ones were examined in the third set of studies. Assuming that differences within the news programming could be answered by directly examining media content, these studies conducted content analyses. News programming aired on minority-owned stations showed minority appearances and covered items and events of greater interest to minorities more frequently than on White-owned stations. Nevertheless, these studies were not without limitations: Content analysis depended on individual coders' interpretations. Thus, studies adopting content analysis tended to be very narrow in scope (in both service and geographical areas covered).

The second set of studies, based on analyses of surveys and interviews of station owners and managers, demonstrated that minority owners tried to promote content targeted to their minority communities. Although some confounding factors might account for the differences in content between minority-owned stations and White-owned ones, this set of studies suggests that minority owners' intentions to promote content tailored to their communities could at least partly explain the differences

⁹ At first, minority ownership appeared to have a negative relationship respectively with local news minutes on a market level (Erb, 2011) and with being a news station (Stroup, 2007). However, these relationships were statistically significant only at a marginal level (Erb, 2011) or disappeared depending on how variables were operationalized (Stroup, 2007).

Table 4. The Nexus Between Minority Ownership and Content.

Nexus	Author(s) (Year)	Data	Method	Service
No	Erb (2011)	Data on ownership, market-level industry, and demographics by the FCC Media Bureau	Quantitative analysis: statistical tests (regression)	TV, news-paper, radio
No	Stroup (2007)	Arbitron markets (2002–2005)	Quantitative analysis: statistical tests (regression)	Radio
No	Schement and Singleton (1981)	FCC license renewal files	Quantitative analysis: descriptive statistics	Radio
No	Turner and Cooper (2007)	BIA Media Access Pro (2006, 2007); the FCC's CDBS Public Access; Minority Commercial Broadcast Ownership reports by the NTIA (1998, 2000)	Quantitative analysis: statistical tests (ANOVA, <i>t</i> -test, OLS, and Probit maximum likelihood models)	TV
Yes	Crawford (2007)	Ownership data from Diwadi, Roberts, and Wise (2007); programming data from Nielson; program schedules by TMS; ratings by Nielson and Kagan; advertising minutes by TNS (two weeks of every year between 2003 and 2006)	Quantitative analysis: statistical tests (regression)	TV
Yes	Rennhoff and Wilbur (2011)	Minority media ownership variable by the FCC (2007, 2009); TV ratings by Nielson Media Research Galaxy ProFile (2005–2010)	Quantitative analysis: statistical tests (correlations, regression)	TV, news-paper, radio

Suggestions for Future Research on the Nexus Between Minority Ownership and Content

To build on the existing studies and determine a possible nexus between minority ownership and content, it would be beneficial to execute three sets of studies, focusing on (a) owners/managers, (b) content, and (c) the audience. These exploratory studies could be cross-analyzed to establish a more comprehensive picture of the nexus.

Focusing on owners/managers, the first set of studies should build upon previous studies of owners' and managers' intentions to promote minority-tailored content. It can examine how individuals in different positions are involved in decisions about their target audiences, possibly under the assumption that philosophy flows vertically from owners to managers, producers, and staff. Data can be collected through surveys and interviews with the individuals, an analysis of internal documents, and observations of the decision-making process. This would allow researchers to examine how and to what extent minority

owners' intentions to promote minority-targeted content are realized, and whether the owners listen to their audiences.

The second set of studies on content, could build on the existing studies demonstrating differences within news programming. Specifically, content analyses can be conducted to examine news as well as other programming, such as entertainment or music. For example, within news programming, researchers can examine whether there is a nexus between minority ownership and news sources that minority-owned stations rely on for news production. Also, expanding beyond news programming, one might examine whether minorities appearing in entertainment shows frequently play professional roles.

In the third investigation, the focus should be on the audience. Studies can examine what audiences think they are receiving and consuming from minority-owned media and, specifically, whether they think the content provided by minority-owned media is tailored to their needs and wants. Furthermore, researchers can examine generally what media audiences follow and can closely question the reasons for audiences' uses of or preferences for certain media.¹⁰ One benefit of this audience-centered research is that it is not necessarily limited to a single medium; it can cover the multimedia environment in which audiences find themselves, as it relies on audience responses, supplementing the limitation of many studies reviewed in this article.

By looking into these aspects of (a) owners/managers, (b) content, and (c) audience, a more comprehensive picture can be obtained regarding the nexus between minority owners and content tailored to minority communities. Although some of the suggested methods (e.g., interpretations of interviews and content analysis) tend to be somewhat labor-intensive and narrow in scope,¹¹ the three sets of studies could allow researchers and policymakers a broader, more practical picture of ownership, content, and audience, as opposed to separate pictures of ownership and content with little consideration of audience.

Furthermore, the three sets of exploratory studies could complement and even improve analyses of hard industry data. To be specific, if certain factors emerge from the three sets of studies that appear to be critical in researching ownership and content, these factors could be included in the future construction of a large-scale dataset. Before including certain factors in a large dataset, it would be critical that a systematic measurement of the factors is devised. Analyses of such a dataset would then allow researchers to validate the findings from the three types of exploratory studies.

¹⁰ Some studies have demonstrated the nexus between the group status of audiences and their uses of or preferences for certain media content. Bendixen and Associates for New California Media (2005) showed that ethnic adults tended to prefer ethnic media to mainstream media. Also, Siegelman and Waldfogel (2001) and Waldfogel (2011) demonstrated that Blacks tended to listen to Black-targeted radio programming more than Whites, and Hispanics tended to tune into Spanish-language programming more than non-Hispanics. Nielson's (2011) report on TV trends also revealed similar findings; for example, African Americans preferred programs such as *Black Girls Rock!*, and Hispanics preferred programs including *Soy Tu Dueña*.

¹¹ It is thus critical that researchers carefully sample their subjects.

Conclusion and Suggestions for Future Research on the Triangle

This review of studies suggested some support for positive correlations of minority ownership, employment, and content targeted to minorities: *the triangle*. It appeared that minority ownership was positively related to the employment of a more diverse group, the employment of minority groups was positively related to the provision of diverse content, and minority-owned stations tried to air content tailored to minority communities more than White-owned stations. Since a review of prior scholarship demonstrated the existence of the triangle, at least some support is provided for the FCC's minority ownership preference and diversity policies.

To further support the FCC's policies or to illuminate different paths for policy development, it would be beneficial to conduct future research on the triangle that builds on the existing literature while accounting for its weaknesses. The following are suggestions for future research designed to improve upon the gaps in previous studies and to make a meaningful contributions to scholarly and policy-related discussions regarding the triangle.

The fundamental weakness of existing studies involves the limitations of the data used to measure minority ownership, employment, and content. With regard to how to measure the level of minority ownership and employment, there was little ambiguity. The racial identities of owners and employees were identified using broadcast-industry data. Nevertheless, these data were inconsistently collected every year and were therefore not appropriate for longitudinal analyses. These limitations prevented researchers from going beyond showing that associations of minority ownership, employment, and content existed and from explaining why certain relationships existed.

Regarding content, there was more flexibility in measurement. Some researchers examined news and public affairs programming minutes. Other researchers differently operationalized minority content as (a) programming formats for minorities, (b) owners' intentions to tailor content to their communities, and (c) minority appearance or issue coverage in news, depending on the data each researcher used. Studies focusing on programming formats for minorities relied on broadcast-industry data. However, these studies overlooked other meaningful differences within each programming format (e.g., in news programming, were more issues significant to minority communities covered?). Other studies focusing on owners' intentions to tailor content to their communities relied on survey data. In these studies, it was unclear whether their intentions were realized in the actual content and whether audiences appreciated it. Studies on minority appearance or issue coverage in news actually examined news content. However, the scope of content analyses tended to be limited by geographical areas, the number of outlets, and the kinds of media covered.

To examine the nexus of minority ownership, employment, and content, researchers and policymakers need to hold more discussions regarding how to define and measure each concept, especially content: what content we expect to see more with more active promotion of minority broadcast ownership and employment. For example, we may anticipate observing minority owners' intentions to promote political and cultural content tailored to their communities more than news and public affairs minutes.

Then, the question remains whether the owners' intentions are realized in content and whether audiences actually appreciate them.

The studies reviewed in this article (the majority of which involved quantitative analyses) provided some support for the positive associations of minority ownership, employment, and content. A few studies successfully showed that minority owners had intentions to hire a more diverse workforce and air more diverse programming content (e.g., Bachen et al., 1999; Fife, 1986; Ivy Planning Group, 2000). However, it may be difficult to generalize the findings, as the number of sampled stations was limited (e.g., Fife, 1986), or to conclude that minority ownership caused minority employment and content to increase, based on cross-sectional surveys (e.g., Bachen et al., 1999). Thus, building on the prior scholarship on the triangle, this article makes two suggestions: (a) Researchers can adopt qualitative methods to delve into the explanations behind the data revealing such associations (i.e., *why* such associations were found and whether there are confounding factors that can explain the associations), and (b) industry-wide datasets can be collected longitudinally to determine the causal relationships of minority ownership, employment, and content.

The first suggestion is to conduct qualitative studies to better understand the positive associations of minority ownership, employment, and content. The core question is whether minority ownership influences the employment of a more diverse workforce and the broadcasting of programming tailored to minority audiences' wants and needs. To answer this question, three sets of qualitative, exploratory studies can be conducted, focusing on (a) broadcast station stakeholders such as owners, managers, and employees, (b) content, and (c) audience. These studies can explore whether increased minority ownership and employment heightens the volume and quality of minority content. Specifically, research can be carried out to examine (a) whether minority broadcast station stakeholders actively seek out content for their communities or listen to the content needs of minority audiences by conducting observational studies, surveys, and interviews in the stations;¹² (b) whether minority-owned stations air more content tailored to minority communities by executing content analysis; and (c) whether audiences perceive content broadcasted by minority-owned stations as better tailored to their civic, political, or cultural needs. More fundamentally, researchers can conduct surveys and interviews of audiences to

¹² There might be concerns about who would fund the proposed research and, specifically, whether it would be appropriate for the FCC to provide the funding. Such concerns were at the core of the recent controversy around the FCC's proposed research involving qualitative interviews of media providers on the critical information needs of the American public. While the FCC considered supporting this research in 2013, entities such as the NAB opposed, arguing that the FCC "regulates some of the speakers to be analyzed" and thus is inappropriate as a sponsor (NAB, 2013, p. 3). The NAB also argued that there was no need for "government-sponsored researchers" to question journalists about "their news judgment and editorial decision-making" (p. 4). Finally, in February 2014, the FCC decided not to support the proposed research. Still, concerns around funding should not preclude research into the triangle and evidence-guided policymaking. Suggestions such as "institutional separation of data-gathering and analytical functions from policymaking functions" (Napoli, 2008, p. 6) could help to address the aforementioned concerns. Also, researchers pursuing the research on broadcast-station stakeholders need to be mindful of the proper incentives for the stakeholders.

investigate whether certain audiences feel that their significant content needs and wants are satisfied by existing broadcast stations. For example, if a certain population in the market has underserved needs and wants, the question of which broadcast stations can and will serve their needs and wants remains. This audience-centered approach¹³ creates a scenario in which researchers collectively consider more than two services in their analyses; this is especially valuable considering that today, audiences are surrounded by and make use of multiple media.¹⁴ Although most audiences make use of more than two media (e.g., radio, TV, newspapers, and the Internet), most studies have examined only one medium. A few studies considered two media but conducted separate analyses for each. Furthermore, it would be beneficial to include newer media such as cable television and the Internet in future analyses.¹⁵

These three sets of qualitative studies might inform researchers and policymakers in making possible causal inferences on the triangle and in understanding how broadcast-station stakeholders, content, and audiences interact in a market. One possibility is that the “needs of communities” (e.g., the needs of various minority groups, including languages, and news interests in minority-related topics) are identified as a confounding factor in the associations of the triangle (FCC, 1976, 1983, as cited in Bachen, Hammond, & Sandoval, 2007). The needs of communities may be essential in directing managers to make certain programming decisions or in attracting certain kinds of job applicants, further supporting Bachen et al. (1999). In other words, if the needs of communities effectively explain the triangle, they could potentially be added to create a rectangle of minority ownership, employment, content, and community needs. Also, other structural factors relevant in explaining the triangle can be added to the framework. For instance, relaxation of media ownership rules (e.g., the Telecommunications Act of 1996) can be a candidate; it may explain the decrease in minority-owned stations and content for certain minority communities in the context of media consolidation (Waldman, 2011) as well as subsequent impact of economies of scale and scope realized by large, consolidated chains.

The second suggestion is to assemble a reliable dataset for longitudinal analyses. Such a dataset would allow researchers to tell a comprehensive causal story about the nexus of ownership, employment, and content. Datasets can be industry-wide, covering multimedia, and can include minority ownership, employment, and content information along with potential confounding factors. For confounding factors, audience-related factors informed by the above-mentioned three sets of studies (e.g., the needs of

¹³ When discussing emergent diversity policy concerns, Napoli (2011) coined the term *user-focused diversity*, acknowledging that users today are more empowered than ever because of the interactive media environment and user-generated content.

¹⁴ Understanding how audiences make use of myriad media outlets would be especially relevant for today’s diversity-related policy discussions. For example, the ratio of media supply to demand drastically increased from 82:1 (in 1960) to 884:1 (in 2010), implying that audiences attended to only a small portion of what was available and that they might have consumed less information diversity (Neuman, Park, & Panek, 2012).

¹⁵ Significant research can most effectively and comprehensively be done by scholars in the communications field. Communications scholars have expertise in understanding and studying audiences, content, and broadcast-station personnel and the new multimedia environment.

communities) could be included. It would be beneficial to take audiences into account in these debates on the triangle because the audience, or the public, is the paramount interest to be served, after all.

Based on the suggestions made in this article, future research on the triangle can build on prior scholarship and yield empirical evidence that has been collected with multiple methods covering various aspects of the triangle. It is worth noting, however, that since the 2010 Media Ownership Studies, this body of literature on the triangle of minority ownership, employment, and content has not seen substantial additions. Although the FCC's 2014 report on ownership of commercial broadcasting stations disclosed data on broadcast ownership by gender, ethnicity, and race,¹⁶ it did not examine ownership's relationship with employment or content. And according to the 2014 quadrennial regulatory review, the FCC does have an ongoing study of Hispanic television investigating the impact of Hispanic ownership on Hispanic-oriented programming and Hispanic viewership along with digital multicasting's relationship with Hispanic programming. However, this study is yet to be released. It is hoped that research on the nexus of minority ownership, employment, and content continues; only then can empirical evidence provide comprehensive explanations for the triangle and illuminate diversity-related policy development.

References

- Abrams v. United States, 250 U.S. 616 (1919).
- Associated Press v. United States, 326 U.S. 1 (1945).
- Austin, C. (2011). Overwhelmed by big consolidation: Bringing back regulation to increase diversity in programming that serves minority audiences. *Federal Communications Law Journal*, 63(3), 733–763.
- Bachen, C., Hammond, A., Mason, L., & Craft S. (1999). *Diversity of programming in the broadcast spectrum: Is there a link between owner race or ethnicity and news and public affairs programming?* Retrieved from www.fcc.gov/opportunity/meb_study/content_ownership_study.pdf
- Bachen, C. M., Hammond, A. S. IV, & Sandoval, C. J. (2007). Serving the public interest: Broadcast news, public affairs programming, and the case for minority ownership. In P. M. Napoli (Ed.), *Media diversity and localism: Meaning and metrics* (pp. 269–306). Mahwah, NJ: Lawrence Erlbaum.
- Baker, C. E. (2007). *Media concentration and democracy*. New York, NY: Cambridge University Press.
- Bendixen and Associates for New California Media. (2005). *The ethnic media in America: The giant hidden in plain sight*. Retrieved from <http://www.npr.org/documents/2005/jul/ncmfreport.pdf>

¹⁶ In an effort to collect more reliable and accurate data on minority ownership, the FCC has established a "new, machine-readable Form-323" (FCC, 2014b, p. 112).

- Congressional Research Service. (1988). *Minority broadcast station ownership and broadcast programming: Is there a nexus?* Washington, DC: Library of Congress.
- Crawford, G. S. (2007). *Television station ownership structure and the quantity and quality of TV programming*. Retrieved from http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-07-3470A4.pdf
- Einstein, M. (2004). *Media diversity: Economics, ownership, and the FCC*. Mahwah, NJ: Lawrence Erlbaum.
- Erb, J. (2011). *Local information programming and the structure of television markets*. Retrieved from http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-308508A1.pdf
- FCC (Federal Communications Commission). (2014a). *Report on ownership of commercial broadcasting stations*. Retrieved from https://apps.fcc.gov/edocs_public/attachmatch/DA-14-924A1.pdf
- FCC (Federal Communications Commission). (2014b). *2014 Quadrennial Regulatory Review*. Retrieved from https://apps.fcc.gov/edocs_public/attachmatch/FCC-14-28A1.pdf
- Fife, M. D. (1979). *The impact of minority ownership on broadcast program content: A case study of WGPR-TV's local news content*. A Report Submitted to the National Association of Broadcasters.
- Fife, M. D. (1986). The impact of minority ownership on minority images in local TV news, in communications: A key to economic and political change. In O. H. Gandy, Jr. (Ed.), *Selected Proceedings from the 15th Annual Communications Conference. Communications: A Key to Economic and Political Change* (pp. 99–125). Washington, DC: Howard University.
- Hammond, A. S., IV. (1991). Diversity and equal protection in the marketplace: The Metro Broadcasting case in context. *Arkansas Law Review*, 44, 1063–1096.
- Hammond, A. S., IV. (1998). Measuring the nexus: The relationship between minority ownership and broadcast diversity after *Metro Broadcasting*. *Federal Communications Law Journal*, 51, 627–637.
- Honig, D. (1983). Relationships among EEO, program service, and minority ownership in broadcast regulation. In O. H. Gandy Jr., P. Espinosa, & J. A. Ordover (Eds.), *Proceedings from the Tenth Annual Telecommunications Policy Research Conference* (pp. 85–91). Norwood, NJ: ABLEX Publishing.
- Horwitz, R. B. (2005). On media concentration and the diversity question. In P. M. Napoli (Ed.), *Media diversity and localism: Meaning and metrics* (pp. 9–56). Mahwah, NJ: Lawrence Erlbaum.
- Ivy Planning Group. (2000). *Whose spectrum is it anyway? Historical study of market entry barriers, discrimination and changes in broadcast and wireless licensing*. Retrieved from http://transition.fcc.gov/opportunity/meb_study/historical_study.pdf

- Jeter, J. P. (1981). *A comparative analysis of the programming practices of Black-owned Black-oriented radio stations and White-owned Black-oriented radio stations* (Doctoral dissertation). Available from ProQuest Dissertations and Theses database (303194471).
- Johnson, K. A. (1987). *Media images of Boston's Black community*. Boston, MA: William Monroe Trotter Institute.
- Lin, W. Y., Song, H., & Ball-Rokeach, S. (2010). Localizing the global: Exploring the transnational ties that bind in new immigrant communities. *Journal of Communication, 60*(2), 205–229.
- Lutheran Church—Missouri Synod v. FCC, 141 F.3d 344 (D.C. Cir. 1998).
- MD/DC/DE Broadcasters Associations et al. Petitioners v. FCC, 236 F.3d 13 (D.C. Cir. 2001).
- Metro Broadcasting v. FCC, 497 U.S. 547 (1990).
- Napoli, P. (1999). Deconstructing the diversity principle. *Journal of Communication, 49*, 7–34.
- Napoli, P. M. (2008). Paradoxes of media policy analysis: Implications for public interest media regulation. *Administrative Law Review, 60*(4), 801–812.
- Napoli, P. M. (2011). Diminished, enduring, and emergent diversity policy concerns in an evolving media environment. *International Journal of Communication, 5*, 1182–1196.
- National Association of Broadcasters. (1986). *Minority broadcasting facts*.
- National Association of Broadcasters. (2013). *Comments to the FCC*. Retrieved from <https://www.nab.org/documents/filings/CINStudyDesignComments072313.pdf>
- Neuman, W. R. (2010). *Media, technology, and society: Theories of media evolution*. Ann Arbor, MI: University of Michigan Press.
- Neuman, W. R., Park, Y. J., & Panek, E. (2012). Tracking the flow of information into the home: An empirical assessment of the digital revolution in the U.S. from 1960–2005. *International Journal of Communication, 6*, 1022–1041.
- Nielson. (2011). *U.S. TV trends by race and ethnicity*. Retrieved from <http://www.nielson.com/content/dam/corporate/us/en/conference/Race%20and%20Ethnic%20TV%20White%20Paper%20REPORT.pdf>
- Prometheus Radio Project v. FCC, 373 F.3d 372 (3d Cir. 2004).
- Prometheus Radio Project v. FCC, 652 F.3d 431 (3d Cir. 2011).

- Rennhoff, A. D., & Wilbur, Kenneth C. (2011). *Local media ownership and media quality*. Retrieved from http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-308505A1.pdf
- Schement, J. R., & Singleton, L. A. (1981). The onus of minority ownership: FCC policy and Spanish-language radio. *Journal of Communication*, 31(2), 78–83.
- Siegelman, P., & Waldfogel, J. (2001). *Face and radio: Preference externalities, minority ownership, and the provision of programming to minorities*. Retrieved from www.fcc.gov/ownership/roundtable_docs/waldfogel-c.pdf
- Spitzer, M. L. (1990). Justifying minority preferences in broadcasting. *Southern California Law Review*, 64, 292–361.
- Stroup, C. (2007). News operations (Section III). Retrieved from http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-07-3470A5.pdf
- Turner, S. D. (2007). *Off the dial: Female and minority radio station ownership in the United States*. Retrieved from http://www.freepress.net/files/off_the_dial.pdf
- Turner, S. D., & Cooper, M. (2007). *Out of the picture 2007: Minority and female TV station ownership in the United States*. Retrieved from <http://www.freepress.net/files/otp2007.pdf>
- Usher, N. (2014). *Making news at The New York Times*. Ann Arbor, MI: University of Michigan Press.
- Waldfogel, J. (2011). *Station ownership structure and the provision of programming to minority audiences: Evidence from 2005–2009*. Retrieved from http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-307471A1.pdf
- Waldman, S. (2011). *The information needs of communities: The changing media landscape in a broadband age*. Retrieved from http://transition.fcc.gov/osp/inc-report/The_Information_Needs_of_Communities.pdf
- Winter Park Communications, Inc. v. FCC, 873 F.2d 347 (D.C. Cir. 1989).